

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA)
)
 v.)
)
ALAN FISCHER III,)
 also known as "AJ,")
)
 Defendant.)

Case No. 1:22-CR-00011 (RJL)

**DEFENDANT'S REPLY TO GOVERNMENT RESPONSE TO RELEASE ON BAIL
AND STAY OF TRANSFER**

Defendant, ALAN FISCHER III, also known as "AJ," by and through undersigned counsel, replies to the Government's response at ECF No. 40 for the above captioned case whereby the Government does not oppose Defendant's ECF No. 38 Motion for Release on Bail with Conditions; and otherwise supports the Defendant's ECF No. 37 Motion for Stay on any Transfer or for this Court to moot the action. Mr. Fischer thus requests this Court issue the proposed release orders submitted with ECF No. 38, and either issue the order or moot ECF No. 37. Mr. Fischer submits the following in support of his request:

Mr. Fischer appreciates the Government's ability, after being provided information from the Defendant, to admit a past mistake made on January 14, 2022 in its opposition to his release on bail. His motion at 1:22-CR-00011 (RJL) ECF No. 38 (with restricted exhibits at ECF No. 39 that the Government has seen), provides his argument as to why release is proper and just. The Government agrees he should be released with the conditions proposed in the order with ECF No. 38. While evidence and argument as to the crimes for which Mr. Fischer was indicted will proceed in pretrial and trial activity, he is not required to prove innocence of the indictment here. Under the Bail Reform Act of 1984, the parties now all agree he should be released from jail.

Through this reply, Mr. Fischer further expresses his faith in the justice system and for due process under the Bail Relief Act of 1984.

WHEREFORE, for the foregoing reasons, and all provided in his original motions, and any others this Court deems just and proper, Defendant through counsel, respectfully requests that this court issue the orders to release Mr. Fischer on bail and to stay any transfer of Mr. Fischer from Florida to Washington D.C. by the U.S. Marshals Service.

Dated March 4, 2022

Respectfully submitted,

/s/ Carolyn A. Stewart

Carolyn A. Stewart, D.D.C. Bar No. FL0098

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CERTIFICATE OF SERVICE

On this **4th** day of March 2022, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Carolyn A. Stewart
Carolyn A. Stewart
Defense Attorney