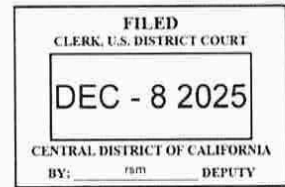


AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT
for the



Marlon William Bell
Petitioner

v.

Department of Homeland Security
Adelanto ICE Processing Center - West Warden ET al
Respondent
(name of warden or authorized person having custody of petitioner)

Case No. **5:25-CV-03378-MEMF-AGR**
(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

- (a) Your full name: Marlon William Bell
(b) Other names you have used: _____
- Place of confinement:
(a) Name of institution: Adelanto ICE Processing Center - West
(b) Address: 10250 Rancho Real
Adelanto CA 92301
(c) Your identification number: ~~XXXXXXXXXX~~
- Are you currently being held on orders by:
 Federal authorities State authorities Other - explain:
Department of Homeland Security
- Are you currently:
 A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you: _____
(b) Docket number of criminal case: _____
(c) Date of sentencing: _____
 Being held on an immigration charge
 Other (explain): _____

Decision or Action You Are Challenging

- What are you challenging in this petition:
 How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

- Pretrial detention
- Immigration detention
- Detainer
- The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- Disciplinary proceedings
- Other (explain): _____

6. Provide more information about the decision or action you are challenging:

- (a) Name and location of the agency or court: _____
- (b) Docket number, case number, or opinion number: _____
- (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): _____
- (d) Date of the decision or action: _____

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

- Yes No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court: _____
- (2) Date of filing: _____
- (3) Docket number, case number, or opinion number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal: _____

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

- Yes No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

- Yes No

If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: _____

11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

- Yes No

If "Yes," provide:

- (a) Date you were taken into immigration custody: Oct, 28th 2025
- (b) Date of the removal or reinstatement order: 2013
- (c) Did you file an appeal with the Board of Immigration Appeals?

- Yes No

PETITION FOR WRIT OF HABEAS CORPUS UNDER 28 U.S.C 2241

Grounds for your Challenge in This Petition

GROUND ONE: Fourth Amendment

Petitioner was Illegally Detained BY Department of Homeland Security 389 (1932). Courts have framed the obligation for an agency to follow its own regulation as deriving from 706 (2) (A) or other APA provisions. See eg., *Suncor Energy (U.S.A) Inc . V United States Env't Prot. Agency.*, 50 F. 4th 1339, 1352 (10th Cir. 2022)(holding that EPA action violated 706 (2) (A) because it ignored the agency's regulatory definition of facility) ; *Kidd v. Mayorkas* , 734 F. Supp. 3D 967 , 983-984 (C.D Cal. 2024) (ICE policy of warrant less " knock and talk " violated agency's regulation and thus 706 (2) (A). Agencies must adhere to internal procedures designed to provide protection to individuals. *Morton v Ruiz*, 415 U.S 199, 235 (1974) (where the right of individuals are affected , its is incumbent upon agencies to follow their own procedures. See also *Lopez*, 318 F. 3d at 247; *Beshir v. Holder*, 853 F. Supp . 2D 1, 11 (D.D.C 2011) (DHS Secretary's discretion to issues procedures rule pausing processing of adjustment of status application limited by regulation requiring adjudicate

Petitioner was illegally detained by ICE Agents on October 28th 2025 on my release date from BOP Terminal Island long beach without proper documentation.

GROUND TWO :FIFTH AMENDMENT

Petitioner due process was violated since 2015 and 2021 and 2023 I was detained and prosecute without seeing petitioner evident of legal documentation and status in my country Belize CA I was sent back to country where my life was in danger and I was illegal departed two times and the Government of Belize the DPP Office give petitioner documentation to show proof to the Department of Homeland Security that petitioner life is in danger but the DHS is ignoring the fact of my situation .ICE have withheld all my documentation and refuse to give petitioner a copy so that petitioner can legally challenge his case and proof his innocents.

On November 27th 2025 ICE was trying to deported petitioner without no due process . Petitioner Mother is a US Citizen and she is decease . Petitioner kids are all U.S Citizen all 6 children and petitioner wife is a U.S Citizen and has file a -I130 and been approve since 2000 .

Petitioner's continued detention violates Petitioner's rights to substantive due process through a deprivation of the core liberty interest in freedom from bodily restraint.

The Due Process Clause of the Fifth Amendment requires that the deprivation of the Petitioner's liberty be narrow tailored to serve a compelling.

The Due Process Clause of the Fifth Amendment required the Government to provide due process of law before it deprives someone of life liberty or property. Under judicial precedent the Clause promise more than fair process: It also provides heightened protection against government interference with certain fundamental rights and liberty interested. When a

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Grounds for Your Challenge in This Petition

- 13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: _____

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

(b) Did you present Ground One in all appeals that were available to you?

Yes No

GROUND TWO: _____

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

(b) Did you present Ground Two in all appeals that were available to you?

Yes No

GROUND THREE: _____

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

(b) Did you present Ground Three in all appeals that were available to you?

Yes No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 12-3-25

Martin Bill

Signature of Petitioner

Signature of Attorney or other authorized person, if any

October 23, 2025

Department of Homeland Security
ERO Los Angeles Field Office
300 N. Los Angeles St, Room #7621
Los Angeles, CA 90012

Re: Request for Stay of Deportation

To Field Office Director:

My name is Marlón William Bell (Reg. No. 10506-510) and I am scheduled to be released from the Federal Correctional Institution Terminal Island in San Pedro, California on October 28, 2025.

I am writing to your office to request a Stay of Deportation as I have been notified of my deportation status to the country of Belize upon my release from the Bureau of Prisons at FCI Terminal Island.

My request for a Stay of Deportation is only short term to allow me to make preparations for voluntary self-deportation as follows:

- 1) Purchase a one-way ticket on American Airlines to travel from Los Angeles International Airport (LAX) to Belize City, Belize within 24-48 hours of release
- 2) Pack my personal belongings and settle my affairs with my children who are American citizens for my self-deportation
- 3) My friend Errolyn Murray will help facilitate my deportation and is located at [REDACTED] Los Angeles CA 90025. Phone Number [REDACTED]

I am prepared to voluntarily self-deport in compliance with the DHS Voluntary Self-Deportation program and do not want to be a burden to the United States as I prepare to return home to my country of Belize.

Thank you for your consideration and assistance in this matter.

Respectfully,

Marlon Bell

Marlon William Bell
Reg. No. [REDACTED]
INS# A- [REDACTED]