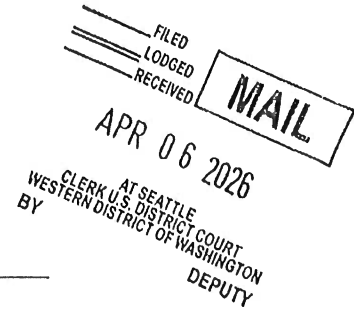


Mario-Gerard: Bernadel
A-
1623 East J. Street, Suite 5
Tacoma, WA 98421

A-



**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

MARIO GERARD BERNADEL

Petitioner

vs.

**PAMELA BONDI: U.S. ATTORNEY GENERAL,
BRUCE SCOTT: WARDEN
UNITED STATES OF AMERICA, ET AL,**

Respondents,

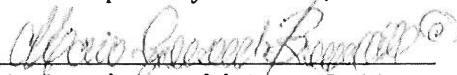
**MOTION FOR LEAVE SUPPLEMENTAL MOTION
FOR ADDITIONAL CLAIMS IN SUPPORT
OF WRIT OF HABEAS CORPUS**

COMES NOW, Mario-Gerard: Bernadel, *Pro-se* without representation of counsel, moves the Court for an order for leave to amend his writ of habeas corpus in accord to 28 USC § 2241 et seq. And Petitioner's original application for great writ of habeas corpus as supported by the motions, petitions, memoranda and papers in this action

This motion for leave is timely and proper as Petitioner has yet to receive a scheduling order and other papers from the Clerk, nor Court.

Petitioner humbly request for leave to amen his application for a writ of habeas corpus and to correct any disabilities resulting from his original filing, All matters remain *status quo ante*. Certified true and correct (28 U.S.C. § 1746).

Respectfully submitted,

By: 
Mario-Gerard: Bernadel: *Pro se* Petitioner

Mario-Gerard:Bernadel-Beneficiary
Trust/Account #: [REDACTED]
c/o. Florence Correctional Center
3250 N. Pinal Parkway Avenue
Florence, Arizona republic
Without U. S, Near [85132]

Mario-Gerard:Bernadel-Beneficiary
Trust/Account #: [REDACTED]
Northwest ICE Detention Center
c/o. 1623 E. J. Street, Suite 5
Tacoma, Washington state for the republic
Near [98421] Without U.S.

One supreme court for the united States
a superior court for the people, house of tens
in the original jurisdiction under God
held in Pima county, Arizona republic and
Pierce county, Washington republic
for

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT, FLORENCE, ARIZONA, AND
TACOMA, WASHINGTON

)
In the matter of:)
)
)
Mario Gerard Bernadel:)
Beneficiary, Affidavit In)
Support of Bond)
Counterclaim Proceedings)
_____) (Assigned)

Trust/Account No: A [REDACTED]

Pinal County)
) SS
)
State of Arizona)

BY SPECIAL AND PRIVATE RESTRICTED VISITATION
(Assigned)

AFFIDAVIT OF TRUTH IN SUPPORT OF BOND:
By: Mario-Gerard Bernadel: Beneficiary

**Affidavit/Memorandum of Law In Support of Bondand Writ of Habeas Corpus
No Oral Arguments Requested**

To; The Honorable Judges: Ms. Victoria Levin, Ms. Tammy Fitting, Ms. Irene C. Feldman and
Mr. Devin Garcia: Co-Fiduciary Trustees, Agent, Successors and/or Assigns.

KNOW ALL MEN BY THESE PRESENTS, that I, Mario-Gerard:Bernadel, the Undersigned, hereinafter "Affiant/Beneficiary," Authorized Representative Sui Juris of the Ens Legis Trust via: BERNADEL, MARIO-G; aver/declare and states the following, facts are true, correct, complete, certain and not meant to mislead to the best of my recollection and belief, having first hand knowledge of the facts, that I am over the age of majority, and if called upon to testify, will certify to each of their veracity; and that:

Identity/Declaration of Status

1. The undisputed fact that, Affiant is in fact an Aboriginal Indigineous American National, born upon the land of know as Columbus of the Americas" in the year of 1958 as recognized by the League of Nations (1922) redesignated as the United Nations, and the Amexem Treaty/ Moorish Treaty,signed by Abraham Lincoln; and See: **Exhibit "A"**

2. Affiant has established his status as certified by the following, including but not limited to:

The Secretary of State of New York, record # [REDACTED], dated 10/7/2024
The Secretary of State of Indiana, record # [REDACTED], dated 9/27/2024
The Secretary of state of Nevada, record # [REDACTED], dated 10/17/2024
The Secretary of State of Iowa, record # [REDACTED], dated 10/20/2024
The Secretary of State of Washington, docket # [REDACTED], dated 07/12/2007
Secretary of State of Arizona by and through the Pima County Recorder, docket # [REDACTED] dated 07-06-2007; and

**Court Cases
Perfected Administrative Claims**

3. U. S. District Court of Arizona Case No. [REDACTED]
U.S. District Court of Arizona Case No. [REDACTED]
U.S. District Court of Arkansas Case No. [REDACTED]
Immigration Court, Immigration and Customs, (ICE") A-[REDACTED] and others:
4. The subject of these proceedings involve the Beneficiary's personal private property, the Ens Legis Trust, Corporate Legal Fiction-Colorable, Corporate Body Politic, a United States Citizen under the color of law, until proven otherwise; and

**Citizenship
Real Party In Interest**

5. Said legal fiction is in-fact an American citizen, (See: Buck Act of 1941, as amended) United States citizen, having noticed and served upon the public multiple times inclusive of the following: See: Attached Documents: as amended,

Recorded in the Pima County Recorder, Tucson, Arizona dated [REDACTED] Docket No. [REDACTED] Sequence [REDACTED]

Recorded in the Secretary of State Washington State, dated [REDACTED] Document No. 2007-[REDACTED]

Recorded in the Maricopa County Recorder, Arizona, dated September 2011, File No. [REDACTED]

Birth Certificate recorded with Vigo County Recorder, State of Indiana, Document No. [REDACTED], dated [REDACTED]

Flight Risk

6. The Affiant/Beneficiary does not pose a flight risk, as Affiant/Beneficiary was in-fact detained in the custody of the Federal Bureau of Prisons-Halfway House in Flagstaff, Arizona for four (4 months) from July 14, 2024 til November 14, 2024 and never obscured of evaded; and
7. That Affiant/Beneficiary is in-fact a private (person) human being, he handles his business privately, not publicly and declares that his business is to be conducted strictly in private, in Judge's chambers to better serve all parties involve and preserve anonymity; and
8. The matters discussed will most likely involve national security concerns as related to The Bank Secrecy Act, Trading with the Enemy Act and other special restricted business and trade secrets, and must be sealed and protected; and

Danger to the Community

9. Affiant Beneficiary is an esteemed member of the community and does not pose a danger to the community, in-fact Affiant/Beneficiary has meaningful relationship in the community that involve the following, including but not limited to:

being a soccer coach in the community to grade school students/to college players and others,
being an empolyer of several companies,(over 7) tradesmen and others,
a provider of multiple jobs in the community to low income earners and others,
a provider of housing to low income earners and others,
a provider of many bank associated loan programs for low income earners and others,
assists in providint governmental services and goverment programs working with governmental agencies/entities, for low earners, etc..

**Perfected Claim Already Recorded in This Action,
under the legal Doctrine Rejudicata**

10. *Secretary of State for Indiana , Vigo County, record [REDACTED], dated 04/03/2023
Notice of Fault with Opportunity to Cure; and
*Secretary of State for Indiana , Vigo County, record [REDACTED] **-Default Notice**
*Secretary of State for Indiana , Vigo County, record # [REDACTED] dated 5/4/2023-
Stipulated Default Agreement-Summary Judgment; and See: Exhibit "B"

Renumeration of This Claim

11. Secretary of State for Indiana, Vigo County, record # [REDACTED], dated 6/5/2023

Fiduciary Trustess Working under Bond in This Action

The Honorable, Victoria Levin: Immigration Judge
The Honorable, Irene Feldmna: Immigration Judge
The Honoarble: Tammy Fitting Immigration Judge; and
Mr. Devin Garcia: DHS Prosecutor,
Mr. Jame Li: DHS Prosecutor; and
Agents, Successors and or Assigns:et al..

12. And lastly Affiant/Beneficairy has already bonded this action by regitering funds of lawful money of the United States into this action; and
13. For all the above stated reasons, Further Affiant/Beneficiary sayeth not. Submitted without prejudice and without recourse.
14. Certified True and Correct [28 USC 1746(1)]. All rights reserved.

By: Mario-Gerard Bernadel ©

Mario-Gerard Bernadel: Beneficiary
Special and Special- Restricted

Via: BERNADEL, MARIO-G. Ens legis Trust

Certificate of Service

A-

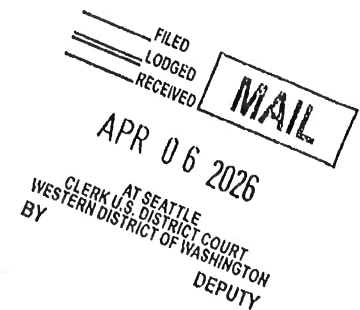
On this 2nd Day of April, 2026. I, Mario-Gerard Bernadel certify that I sent a true and correct copy of the documents and sundry papers to recipients by hand delivery into the Institution's mailbox in a pre-paid first class envelope in accord with the "Prison Mailbox Rule" [Houston v. Lack, 487 U.S. 266, (1988)].

Service to:

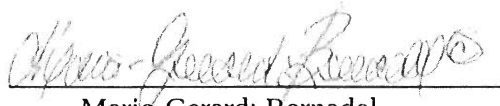
Clerk, United States District Court/Western District of Washington, at Seattle, 700 Stewart Street, Suite 2310, Seattle, Washington 98101

CONTAINING

1. This Certificate of Service
2. Supplemental Filing of Additional Claims
3. Memorandum of Law In Support of Writ of Habeas Corpus
4. Exhibits
5. Proof of Claim
6. Resjudicata
7. Other Documents of Record



Certified true and correct [28 USC 1746(1)]. All rights reserved.

By: 

Mario-Gerard: Bernadel

**Notice to Principal is Notice to Agent
Notice to Agent is Notice to Principal**

(Certificate of Service)
(Cover Page)

Name: Mario-Gerard: Bernadel:
Beneficiary of the Ens Legis Trust
1623 East J. Street, Suite 5
Tacoma, Washington State
Near [98421]

IN THE ORIGINAL JURISDICTION
UNITED STATES DISTRICT COURT
IN AND FOR THE WESTERN DISTRICT
FOR WASHINGTON AT SEATTLE

Mario-Gerard : BERNADEL,	)	IN THE MATTER OF TRUST ACCOUNT
	)	No. A # 
Beneficiary of the Ens Legis Trust	)	
Petitioner	)	MEMORANDUM OF LAW IN SUPPORT OF
	)	GREAT WRIT OF HABEAS CORPUS UNDER
vs.	)	IN THE ORIGINAL JURISDICTION
	)	28 USC 2241
UNITED STATES OF AMERICA ET AL.,	)	
PAM BONDI: Attorney General,	)	
Bruce Scott: Warden,	)	
Kristi Noem: DHS Secretary	)	
ICE Field Office Director,	)	
DOES, MOES AND ROES, 1-1000,	)	
Respondent	)	

Pierce County	)	
	) ss.	Declaration of Mario-Gerard: Bernadel
Washington State	)	

KNOW ALL MEN BY THESE PRESENTS, THAT, The Undersigned Mario-Gerard: Bernadel:
Lawful man, Third Party/Intervener, Real Party In-Interest, herein "Petitioner" states the following:

That Petitioner is being held against his will, refrained from his rights and liberties, and is
currently confined by order from Pamela Bondi: Attorney General:, for the United States at Tacoma's

Northwest Detention Center in Tacoma Washington. Republic, Bruce Scott: Warden, Holder of the key, et al..

Here, the Petitioner moves this Court to issue an order commanding his release the corpus of:
MARIO GERARD: BERNADEL

from the custody of Bureau of ICE, under the directives of Homeland Security, due to the fact that such custody violates his procedural due process rights and liberty interest, in violation of his protected and Constitutional guarantees; and the declaration of Human Rights.

FACTS

1. This Petitioner has been within the confines of the Northwest Detention Center, a Center operated in conjunction with the United States Bureau of Immigration and Customs Enforcement and GEO Group, for the ongoing period of from 11/14/2025 to current, And prior to this location Petitioner was unlawfully held at the Immigration Detention Center in Florence, Arizona from 11/04/2024 until transfer to Tacoma ICE; and
2. On the date of approximately **03/24/2025** the Petitioner entered the Northwest Detention Center and has not been released since that date. The current charges of deportation is :
a violation of Petitioner's right of liberty interest, not to mention the violations of the procedural rights of due process, and to other violations of Constitutional protections established under the Petitioner for a writ of habeas corpus, now under review and ripe for final adjudication
3. Petitioner has appealed before the BIA / Ninth Circuit and the case remains pending.
4. The Ninth Circuit has issued a Stay of Removal in the case # **25-7590**

JURISDICTION

The Jurisdiction of this Court is sought under 28 USC 2241 et seq including but not limited to the controlling laws under the Law Merchants codified under the Uniform Commercial

Codes, the Legal Maxims of Law, Silence by acquiescence and lawful equitable remedies deemed just lawful and proper; and

QUESTION PRESENTED

1. Is the Petitioner entitled to release from the Attorney General?
2. Is alternative relief in the form of Immediate release or other proper equitable remedies mandated by law that deemed reasonable and proper; and

RELIEF REQUESTED

That the Court Order the Petitioner to be released on supervised release pending all finality or that the court orders the Agency to hold a bond hearing(eventhough bond hearing is lawfully inadequate per the Constitutional violations in the original jurisdiction, where individual factors were not considered that would have permitted the release of the Petitioner pending the conclusion of his legal matters with ICE and the District Courts and the Ninth Circuit.

ARGUMENT

An alien should not be held in custody unless there are no facts or circumstances that would guarantee his return for hearings or to be deported. In general, an alien should not be detained or required to post bond unless it is found that he is a threat to the national security or a poor bail risk. Matter of Patel, 15 I & N Dec. 666 (BIA 1976). National Center for Immigrant Rights v INS, 743 F2d 1365 (9th Cir. 1984).

Furthermore, the Ninth Circuit has recently issued guidelines regarding the release of aliens and the jurisdiction of the Immigration Judge and BIA to grant bond in these cases. In particular, the Ninth Circuit, in an unpublished Order in Bromfield v Mukasey, 07-72319 made the distinction regarding persons due bond and those who are held under the authority of the Attorney General. The Ninth Circuit decided that Bromfield was due a bond hearing, and that, even though he was being held pending the Ninth Circuit's ruling on his Petition for Review, he was entitled to bond, and the BIA and IJ had authority to grant the bond.

The Ninth Circuit on July 25th, 2008 issued two decisions in cases that had been pending before it. Those precedent cases are Preito-Romero vs. A. Neil Clark, 07-35458 ____ F. 3d ____; and Casas-Castrillon vs. Lockyer, 07-56261, ____ F. 3d _____. These decisions deliberately discuss the interplay between the statutes governing detention of aliens and release of aliens. In particular, the Ninth Circuit issued precedents dealing with several inter-related issues: A. When bond hearing is required; B. The burden of the parties in bond hearings; C. When detention remains legally authorized.

In this case we have a person who is currently being held by the Immigration Services where the Bond is either nonexistent or where the Bond is too high to afford and is unreasonable given the circumstances that the Respondent will appear for all future hearings.

The Respondent has equities in the United States and those equities far outweigh any adversities. If the Respondent is released he will appear for all hearings and will appear if he is to be removed from the country.

The Respondent here moves the Judge to grant a bond review in this case and to release the Respondent upon conditions that is fair and just.

The release on bond or conditions will allow the Respondent to continue with his life, with his family, and to gain evidence to use in his hearing and to gain possible assistance of counsel or other adequate representative.

Petitioner is not held under 8 USC 1226 (c) according to the Ninth Circuit's decision on the matter. The Ninth Circuit cited that the Government's interpretation was incorrect where the Agency and the Government has repeatedly held that aliens are held under 8 USC 1226 (c) and ineligible for a grant of bond. The Ninth Circuit cited that an alien who has completed the administrative process is held under 8 USC 1226 (a). "which gives the Attorney General general discretionary authority to detain an alien 'pending a decision on whether the alien is to be removed from the United States.'"

The Court in Cases-Castrillon cited, "the Supreme Court similarly recognized in *Denmore v Kim*, 538 US. 510 (2003) that 1226 (c) was intended only to "govern [] detention of deportable criminal aliens *pending their removal proceedings*," which the Court emphasized typically "lasts roughly a month and a

half in the vast majority of cases in which it is invoked and about five months in the minority of cases in which the alien chooses to appeal' his removal order to the BIA. *Id.* at 527-528.

Importantly, the Ninth Circuit held that the conclusion of proceedings occurs upon the dismissal of the alien's appeal by the BIA.

Thus, under the explicit Ninth Circuit holding, the fact that the custody has changed from 1226 (c) to 1226 (a) means that the Agency no longer had mandatory detention of the alien, but has the authority to order release on bond or upon conditions.

Moreover, the Ninth Circuit explicitly rejected the Government's contention that the custody again shifts once the Circuit Court issues an order of stay of removal. The Ninth Circuit also rejected that the custody authority changes once the Circuit grants relief. "We therefore conclude that the mandatory, bureaucratic detention of aliens under 1226 (c) was intended to apply for only a limited time and ended in this case when the BIA affirmed..." *id.* See Prieto-Romero slip op. at 9295.

Directly contradicting the Agency's previous holdings, the Court cited, "Even though Casas' detention is permitted by statute because keeping him in custody could serve a legitimate immigration purpose, **Casas may nonetheless have the right to contest before a neutral decision maker whether the government's purported interest is *actually served* by detention in his case.** There is a difference between detention being authorized and being necessary to any particular person. We hold that the government may not detain a legal permanent resident such as Casas for a prolonged period without providing him a neutral forum in which to contest the necessity of his continued detention."

This decision by the Ninth Circuit completely establishes the right of aliens to an impartial hearing before a neutral decider who will take evidence on the issue and grant bond in the cases where it is amply demonstrated that bond is applicable. Moreover, this finding by the Ninth Circuit is directly in line with Matter of Patel, supra. This standard is the same for persons who are aliens without criminal histories as for those with such a history. According to the Ninth Circuit's decision in Prieto-Romero and Casas-Castrillon, both are entitled to impartial hearings before a neutral factfinder.

Although this Petition is not within the *Zadvydas* mold, the *Zadvydas* opinion opened by noting the clear applicability of general due process standards: physical detention requires both a "special justification" that "outweighs the 'individual's constitutionally protected interest in avoiding physical restraint'" and "adequate procedural protections." 533 US, at 690, 150 L Ed 2d 653, 121 S Ct 2491 (quoting *Hendricks* at 356, 138 L Ed 2d 501, 117 S Ct 2072). Nowhere did the Court suggest that the "constitutionally protected liberty interest" in avoiding physical confinement, even for aliens already ordered removed, was conceptually different from the liberty interest of citizens considered in *Jackson*, *Salerno*, *Foucha*, and *Hendricks*. On the contrary, the Court cited those cases and expressly adopted their reasoning, even as applied to aliens whose right to remain in the United States had already been declared forfeited. *Zadvydas*, 533 U.S., at 690, 150 L Ed 2d 653, 121 S Ct 2491.

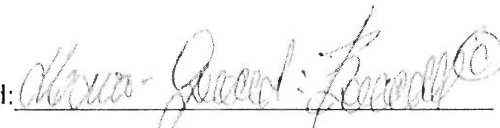
Thus, this Court's review must begin by positing commonly accepted substantive standards and proceeded to enquire into any "special justification" that might outweigh the aliens' powerful interest in avoiding physical confinement "under [individually ordered] release conditions that may not be violated." *Id.*, at 696, 150 L Ed 2d 653, 121 S Ct 2491. The Supreme Court found nothing to justify the Government's position. The statute was not narrowed to a particularly dangerous class of aliens, but rather affected "aliens ordered removed for many and various reasons, including tourist visa violations." *Id.*, at 691, 150 L Ed 2d 653, 121 S Ct 2491. The detention itself was not subject to "stringent time limitations," *Salerno*, 481 U.S., at 747, 95 L Ed 2d 697, 107 S Ct 2095, but was potentially indefinite or even permanent, *Zadvydas*, 533 U.S., at 691, 150 L Ed 2d 653, 121 S Ct 2491. Finally, although both *Zadvydas* and *Ma* appeared to be dangerous, this conclusion was undermined by defects in the procedures resulting in the finding of dangerousness. *Id.*, at 692, 150 L Ed 2d 653, 121 S Ct 2491. The upshot was such serious doubt about the constitutionality of the detention statute that the Supreme Court construed it as authorizing continuing detention only when an alien's removal was "reasonably foreseeable." *Id.*, at 699, 150 L Ed 2d 653, 121 S Ct 2491. In *Demore v Kim*, **538 U.S. 510; 123 S. Ct. 1708**; the Court stated, "While it is true that removal proceedings are unlikely to prove "indefinite and potentially

permanent," 533 US, at 696, 150 L Ed 2d 653, 121 S Ct 2491, they are not formally limited to any period, and often extend beyond the time suggested by the Court, that is, "an average time of 47 days" or, for aliens who exercise their right of appeal, "an average of four months." *Ante*, at 155 L Ed 2d, at 742; see also Case Hearing Report 12 (finding that the average time from receipt of charging documents by a detained alien to a final decision by the immigration judge was 54 days). However, in this case, the confinement has been for **850 days**. Thi is completely excessive and this Court has jurisdiction to order the Agency to release the Petitioner or to set a bond for the Petitioner's release or that the Petitioner be released on conditions.

Petitioner does assert the fact that he is not able to afford a large bond, but may be able to gain assistance from the community in gaining access to a low bond

For the reasons that go before, the Petitioner urges that the court issues orders that does substantial justice.

Dated: April 2, 2026

Signed: 
Mario-Gerard: Bernadel

VERIFICATION

I, Mario-Gerard: Bernadel, do hereby aver that the words above are the truth and the entire truth, that I will testify to those facts under penalty of perjury and I provide this information based upon personal belief that they are the facts of this matter, except where stated on personal belief. Submitted under the penalty of perjury of the laws of the United States.

Dated this 4/02/2026

By: 
Mario-Gerard: Bernadel