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IN THE SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED

SEP 25 2026

OFFICE OF THE CLERK

OLAMIDE OLATAYO BELLO,

Petitioner/Applicant,

v.

UNITED STATES OF AMERICA,

Respondent.

No. 26-5206

**MOTION FOR LEAVE TO FILE AND RENEWED APPLICATION FOR RELEASE
PENDING DISPOSITION OF PETITION FOR WRIT OF CERTIORARI, WITH
SUPPLEMENTAL APPENDIX**

To the Honorable Samuel A. Alito, Jr., Associate Justice of the Supreme Court of the United States and Circuit Justice for the Fifth Circuit:

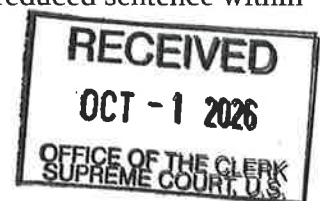
Applicant Olamide Olatayo Bello, proceeding pro se, respectfully seeks leave to file this renewed application for release pending disposition of the petition for a writ of certiorari in No. 26-5206. The application relies principally on 18 U.S.C. § 3143(b), and invokes Supreme Court Rules 22 and 23 to the extent applicable. Applicant also asks, in the alternative, that the application be referred to the Court.

This filing is based on a materially developed record after the earlier release requests: the district court denied Applicant's Pro Se Motion for Bail Release Pending Certiorari, Dkt. 988, in a one-page order entered September 14, 2026 (Dkt. 1009); Applicant's copy bears a handwritten notation that it was received September 21, 2026; the Supreme Court thereafter requested a response to the certiorari petition after the United States had waived response; and on September 23, 2026 the Solicitor General requested an extension through October 23, 2026. Applicant does not contend that the Court's response request predicts the disposition of the petition. It is offered only as an intervening procedural circumstance.

Applicant presently does not possess or have access to Dkt. 988. He therefore does not reconstruct its contents. Dkt. 1009 itself identifies Dkt. 988 as Applicant's motion for bail release pending certiorari and establishes that prior resort occurred. The renewed application instead grounds its substantial-question showing in the available trial, sentencing, appellate, and record-completeness materials.

I. QUESTIONS RELEVANT TO RELEASE

The release inquiry is not limited to whether Applicant can obtain reinstatement of a lost appeal. Applicant recognizes that reinstatement, by itself, is not one of the outcomes listed in § 3143(b)(1)(B). The relevant inquiry is whether the preserved or otherwise reviewable questions underlying meaningful appellate review are substantial and, if resolved in Applicant's favor, are capable of producing reversal, a new trial, a sentence not involving imprisonment, or a reduced sentence within the statutory framework.



Applicant therefore presents the following questions as substantial issues supporting release, while recognizing that the ultimate merits remain for the appropriate reviewing court and that not every asserted error necessarily produces reversal.

II. PROCEDURAL HISTORY AND PRIOR RESORT

Applicant was convicted after a four-day jury trial in January 2025. The trial transcripts identify Applicant as proceeding pro se with Phillip Linder as standby counsel. Applicant was sentenced on July 24, 2025. His first appellate proceeding, No. 25-40043, was dismissed on September 17, 2025 after noncompliance with an August 12 order. Applicant later represented that he was in federal custodial transit during the relevant period and did not receive the order, then repeatedly sought reinstatement and reconsideration.

The Fifth Circuit clerk declined to act on Applicant's October 2025 emergency release motion because No. 25-40043 had already been dismissed. The clerk later denied reinstatement, and reconsideration was denied on November 20, 2025. Those materials are included in the Appendix.

Separately, the Fifth Circuit's July 17, 2026 disposition in No. 25-40772 dismissed the appeal from the amended judgment as untimely, but retained jurisdiction and remanded for the district court to determine whether excusable neglect or good cause justified an extension under Federal Rule of Appellate Procedure 4(b)(4). That disposition illustrates that the notice and timing disputes have remained live and consequential rather than academic.

On September 14, 2026, the district court entered Dkt. 1009 denying Dkt. 988. The order does not state whether the denial rested on flight risk, danger, delay, substantiality, the likely-result requirement of § 3143(b)(1)(B), or another ground. Applicant does not contend that the absence of detailed findings alone establishes entitlement to release; he submits the order to establish prior resort and the posture existing when the district court acted.

III. INTERVENING SUPREME COURT DEVELOPMENT

The United States initially waived its right to respond to the petition unless requested by the Court. The Court thereafter requested a response. On September 23, 2026, the Solicitor General confirmed that request and sought additional time through October 23, 2026. Applicant does not characterize that request as a prediction of certiorari or merits relief. The narrower point is that this development occurred after the district court's September 14 denial and therefore was not before that court.

IV. GOVERNING RELEASE STANDARD

Section 3143(b)(1) makes detention after conviction the default and permits release only if the court finds, by clear and convincing evidence, that the defendant is not likely to flee or pose a danger, and also finds that the appeal or petition is not for delay and raises a substantial question of law or fact likely to result in one of the outcomes specified by § 3143(b)(1)(B). Applicant addresses each requirement directly and does not rely on the pendency of certiorari alone.

The Fifth Circuit's controlling formulation in *United States v. Valera-Elizondo*, 761 F.2d 1020, 1024-25 (5th Cir. 1985), does not require a district judge to predict that his own rulings will be reversed. It asks whether there is a substantial question and whether a favorable resolution of that question is likely to produce the qualifying relief. Applicant therefore presents the issues below by their concrete remedy: acquittal/reversal, new trial, or qualifying resentencing relief.

V. SUBSTANTIAL QUESTIONS CAPABLE OF PRODUCING REVERSAL, A NEW TRIAL, OR QUALIFYING SENTENCING RELIEF

A. Charging instrument, arraignment, plea, and notice under the Federal Rules of Criminal Procedure

The newly supplied Dkt. 393 sharpens this question. The form is titled “Waiver of Personal Appearance at Arraignment and Entry of Plea of Not Guilty,” but paragraph (1) states that Applicant had received a copy of a “Fifth Superseding Indictment.” The form further states that the waiver of appearance and tendered not-guilty plea concerned “this accusation.” Dkt. 393 was filed December 16, 2024. By contrast, the operative charging instrument in the supplied record is Dkt. 376, expressly titled “First Superseding Indictment,” filed December 11, 2024; and the final jury charge repeatedly identifies the First Superseding Indictment as the charging instrument tried. Applicant therefore presents the narrower Rule 10/Rule 43 and due-process question whether Dkt. 393 established a knowing waiver and plea directed to the actual First Superseding Indictment, and, if not, whether the mismatch prejudiced notice, preparation, or the validity of the proceedings. Applicant does not characterize the discrepancy as automatically jurisdictional or structural; the reviewing court should apply the governing preservation and harmless-error standards to the actual record.

The available record raises a question whether Applicant was arraigned and called upon to plead to the First Superseding Indictment on which the January 2025 trial proceeded, whether any waiver validly covered that charging instrument, and how the original indictment was disposed of. Applicant does not assert that every arraignment irregularity is jurisdictional or automatically reversible. The substantial question is whether the operative charging instrument was presented with the notice and plea procedures required by Rules 10 and 43, whether any waiver was knowing and valid, and whether any defect impaired preparation, self-representation, objections, or the ability to identify the charges actually being tried.

B. Pretrial-release revocation and the statutory initiation requirement

Applicant challenges the procedure by which pretrial release was revoked. Section 3148(b) provides that the attorney for the Government may initiate a revocation proceeding by filing a motion with the district court. Applicant contends that the initiating paper was instead filed by Pretrial Services. The issue should be resolved from Dkt. 122, the revocation hearing record, the Government's participation, and Dkt. 139. Applicant does not ask this Court to assume that any defect automatically voided the later conviction. The substantial question is whether the statutory initiation procedure was followed or validly cured, and, if not, what remedy follows where the resulting detention allegedly impaired trial preparation, discovery access, self-representation, and meaningful participation.

The available primary record now confirms the initiating event: Dkt. 139 states that on August 10, 2023, “Pretrial Services filed a Petition for Action on Conditions of Pretrial Release (Dkt. 122),” and that an Assistant United States Attorney appeared for the Government at the August 22 hearing. That sequence presents the statutory question under 18 U.S.C. § 3148(b), whose text provides that the attorney for the Government may initiate revocation by filing a motion. Applicant does not claim that this wording alone establishes automatic reversal; he preserves the question whether initiation by Pretrial Services satisfied the statute, whether later Government participation cured any defect, and what prejudice followed from detention. This sequence matters because 18 U.S.C. § 3148(b) assigns initiation of a revocation proceeding to “the attorney for the Government” by motion. The record therefore presents a statutory question whether a Pretrial Services petition satisfied that initiation requirement and, if not, whether the later appearance of an AUSA at the hearing cured or otherwise rendered harmless the initiation defect. The application treats this as a substantial statutory/due-process question, not as an automatic jurisdictional nullity.

C. Notice failures and due process

The notice issue extends beyond a technical deadline. Applicant contends that court notices and material filings were repeatedly affected by custodial transfers and nonreceipt, culminating in dismissal of No. 25-40043 after an August 12 order that Applicant says he never received while in federal transit. The record shows later attempts to respond, elect counsel, reinstate the appeal, and recall the mandate. The question is whether loss of a first appellate proceeding through court-created or custody-related nonreceipt, followed by denial of reinstatement, satisfied due process and the constitutional protections applicable to a first appeal as of right.

D. Court Interpreters Act and meaningful participation

The trial record shows that an interpreter was present on later trial days and that the reporter noted the interpreter had been sworn before proceedings. Applicant's claim therefore is not that no interpreter ever appeared. The substantial issue is proceeding-specific: whether interpretation was required but absent at material pretrial proceedings and sentencing; whether any waiver complied with 28 U.S.C. § 1827(f); whether the court adequately inquired into comprehension; and whether any deficiency affected self-representation, objections, testimony, allocution, sentencing participation, or preservation. The issue is reinforced by transcript passages that Applicant has challenged as indiscernible or incomplete.

E. Faretta, self-representation, standby counsel, and preparation

Applicant proceeded pro se at trial with standby counsel. The preserved issues include the adequacy and continuing validity of the Faretta waiver, the scope of standby counsel's role, whether standby counsel acted for Applicant on matters reserved to the pro se defendant, and whether detention, discovery access, law-library limitations, transcript access, and denied continuances impaired the ability to prepare. The issue should be analyzed by specific proceeding and specific act, not by a categorical proposition that standby counsel could never speak.

Faretta v. California, 422 U.S. 806 (1975), and McKaskle v. Wiggins, 465 U.S. 168, 177-79 (1984), supply the governing constitutional framework. McKaskle recognizes permissible standby assistance but protects the pro se defendant's actual control over the case and the jury's perception that the defendant is representing himself. The question here must therefore be tied to identified acts, objections, and proceedings rather than to standby counsel's mere presence.

F. Suppression rulings, excluded telephone evidence, and derivative use

Applicant preserved challenges relating to the January 2025 suppression rulings, an excluded Samsung telephone, derivative photographs or information, and the use of disputed device-related material at trial or in closing. The substantial question is whether evidence used against Applicant was independently admissible or instead derived from evidence the court had excluded, and whether the Government's presentation or argument exceeded the suppression ruling in a manner that affected the verdict.

G. Rule 16, Brady, Giglio, Napue, Rule 404(b), Rule 1006, and Rule 902 issues

The preserved record identifies disputes concerning the timing and completeness of discovery, electronic evidence, business and bank records, expert or summary materials, impeachment information, witness benefits or non-prosecution considerations, and underlying records for summaries and certifications. Applicant contends that detention and restricted access compounded those problems. Each claim ultimately depends on the specific material, timing, disclosure duty, preservation, and prejudice; the application relies on the collective existence of concrete disclosure disputes rather than a generalized accusation of misconduct.

H. Separate corporations, affiliated businesses, Government-contract work, and individualized attribution

The First Superseding Indictment itself distinguishes Applicant from the business organizations: it alleges that Bello “controlled and managed” Ajide Technology Corporation, Smooth Multi-Services Platform, Obello Solutions Corporation, Obello, Inc., Yembell, and DOBIT. It separately describes other defendants and their own business entities. That pleading structure supports Applicant’s contention that legal and factual attribution must remain individualized; control or management of an entity is not, without the required proof, identical to personal receipt, borrower status, personal ownership of every corporate asset, or personal responsibility for every transaction attributed to the entity.

A central issue is whether Applicant was improperly treated as interchangeable with separate legal entities. The charging and sentencing materials identify Ajide Technology Corporation, Smooth Multi-Services Platform, Obello Solutions Corporation, Obello Inc., Yembell, DOBIT, and other entities. Applicant contends that some were legally recognized businesses with independent operations and, in some instances, Government-contract activity. Corporate status does not immunize an individual from criminal responsibility for conduct committed through a corporation. But control is not identity; affiliation is not borrower status; and acting as an authorized representative does not automatically make every corporate loan, receipt, payment, account, debt, or loss the individual’s personal criminal conduct.

The substantial question is whether the Government and sentencing record supplied an individualized nexus - entity by entity, transaction by transaction, and dollar by dollar - between Applicant’s own conduct or properly attributable jointly undertaken conduct and the amounts treated as criminal proceeds, loss, restitution, or relevant conduct. Evidence that an entity was legally organized, operating, employing workers, filing taxes, serving customers, or performing Government contracts would not negate fraud if fraud were independently proven; it would, however, bear directly on any generalized theory that the entity itself was wholly fictitious or sham.

I. Single conspiracy versus multiple conspiracies; hub-and-spoke variance and spillover

Applicant preserved the contention that the proof showed independent spokes rather than one overarching conspiracy with a connecting rim. This issue bears on agreement, knowledge, intent, variance, severance, evidentiary spillover, and the need for a multiple-conspiracy instruction. The merits require participant-by-participant analysis of the alleged agreements, transactions, awareness of other participants, and proof of a common objective.

Kotteakos v. United States, 328 U.S. 750 (1946), remains the central Supreme Court authority distinguishing a single conspiracy from separate agreements linked only by a common hub. Fifth Circuit law asks whether the proof established the conspiracy charged and, if a variance occurred, whether substantial rights were prejudiced. See, e.g., *United States v. Morris*, 46 F.3d 410, 414-15 (5th Cir. 1995). The final jury charge should therefore be assessed against the actual proof and Applicant’s preserved objections, rather than treating “hub-and-spoke” terminology itself as dispositive.

J. Rule 29 sufficiency of the evidence

The trial record indexes motions for judgment of acquittal and renewed motions before closing argument. Applicant therefore identifies Rule 29 as a principal qualifying issue because a successful sufficiency challenge can result in acquittal rather than merely another proceeding. The inquiry should be count-specific: whether the evidence established the agreement, knowledge, intent, and participation

required for the wire-fraud-conspiracy count and the money-laundering-conspiracy count, including the nexus between alleged proceeds and the charged laundering agreement.

The transcript is direct preservation evidence: after the jury was excused on January 16, 2025, Applicant stated, “I reurge the Rule 29 motion for judgment of acquittal,” and the district court overruled it. The same proceeding records Applicant joining the objection to the charge and the court overruling the objection and denying the requested instructions. These are not merely post hoc characterizations; they are preserved trial rulings.

K. Jury instructions, theory of defense, constructive amendment, and variance

The trial record expressly reflects objections to the charge. Applicant contends that requested or preserved instructions concerning conspiracy structure, intent, unanimity, money laundering, fraud, and theory of defense were omitted or inadequately given. The rebuilt merits presentation should compare the proposed instructions, rulings, final charge, indictment, and Government closing to determine whether the jury was permitted to convict on a theory materially broader than the grand jury charged or without adequate guidance on multiple conspiracies and individualized intent.

The final written charge instructed that each defendant and count must be considered separately, but the selected charge does not contain a separately titled multiple-conspiracies instruction. Whether the instructions, taken as a whole, adequately protected against conviction for an uncharged agreement must be evaluated together with the evidence, the requested instructions, and the preserved objection. Applicant does not characterize the omission as automatically reversible without that comparison. The written charge also states that each count and each defendant must be considered separately and individually and that the jury must give separate consideration to the evidence as to each defendant. Applicant relies on that instruction when arguing that corporate, co-defendant, and transaction evidence could not properly be treated as an undifferentiated whole.

L. Prosecutorial argument and use of disputed or excluded material

Applicant also preserves challenges to opening and closing argument, including alleged characterization of disputed corporate evidence, references to device or photographic material implicated by suppression rulings, burden-shifting, and statements allegedly unsupported by admitted evidence. The question is whether preserved prosecutorial statements, viewed in context of the charge and evidence, materially affected the verdict.

M. Rule 33 and newly discovered or newly accessible evidence

Applicant has pursued Rule 33 relief and related claims concerning evidence discovered or made accessible after trial. The legal standards differ depending on whether evidence was genuinely newly discovered, existed earlier but was withheld, or existed but was inaccessible because of detention or record deficiencies. Those distinctions should be maintained on merits review. The present release application relies on the fact that Rule 33 issues were preserved and are capable, if meritorious, of producing a new trial.

N. Sentencing notice, late loss information, restitution, and Rule 32

The sentencing transcript supplies a concrete notice issue. The Government announced two additional loss amounts that it described as previously unknown. Defense counsel immediately stated that he had learned of those amounts that morning and objected. The court then offered to hold restitution open for 90 days. This record supports substantial questions concerning notice, the opportunity to investigate and contest loss, Rule 32 findings, restitution procedure, and whether late information affected the sentence or restitution amount.

The transcript shows that the Government changed the asserted actual-loss/restitution amount at sentencing, identifying two amounts it said had been “previously unknown”; defense counsel responded that he had “just found out about those amounts this morning” and objected. The court offered to hold restitution open for 90 days. That record supplies a concrete notice-and-opportunity-to-contest issue rather than a generalized sentencing complaint.

O. Individualized relevant conduct, role, obstruction, sophisticated means, loss, and restitution

The original and amended judgments also warrant review. Both identify the convictions as Counts 1 and 2 of the First Superseding Indictment. The amended judgment states that the underlying indictment(s) were dismissed on the Government’s motion, while retaining the 293-month sentence. Applicant relies on those documents to define the operative conviction and to test whether later judgment alterations complied with the applicable criminal rules and notice requirements; he does not assume from the amendment alone that the conviction is void.

The sentencing record also raises whether the court made sufficiently particularized findings for relevant conduct and the enhancements attributed to Applicant. The corporate-separateness issue is especially important here: even if Applicant controlled or represented an entity, sentencing attribution still requires a factual basis connecting the particular conduct and loss to Applicant under the governing relevant-conduct principles. Applicant contests aggregation that treats all affiliated-entity activity as synonymous with his own conduct without the required individualized nexus.

P. Sentencing interpreter and allocution

Applicant separately challenges language access at sentencing. The issue is whether the statutory conditions requiring an interpreter were present, whether interpretation was provided or validly waived, and whether any deficiency impaired objections, comprehension of sentencing information, or allocution. This is distinct from the trial-day interpreter issue and should be reviewed on the sentencing record itself.

During allocution Applicant expressly stated, “I was expecting to get a interpreter today.” The transcript then contains repeated “Indiscernible” notations during his allocution. The question is whether, under 28 U.S.C. § 1827 and the circumstances actually presented to the court, an interpreter was required, validly waived, or necessary to protect meaningful allocution and sentencing participation.

Q. Incomplete record, FRAP 10(c), FRAP 10(e), and 28 U.S.C. § 753(b)

Applicant has repeatedly sought correction and completion of the record, identifying missing bench-conference material, transcript omissions, indiscernible passages, and sentencing-record concerns. The court reporter later informed Applicant that no audio recording of the sentencing proceeding existed because a live reporter was present. The substantial issue is not the absence of audio standing alone, but whether identified omissions or disputed passages prevent meaningful review of preserved claims and whether reconstruction, supplementation, or remand is required.

The court reporter later advised Applicant in writing that no sentencing audio recording existed because a live reporter was present. The absence of audio is not itself reversible error; its significance is that the transcript contains disputed “Indiscernible” passages and Applicant has identified specific omissions he says bear on preserved issues. The record question therefore concerns meaningful appellate review and reconstruction, not an abstract entitlement to audio.

R. Cumulative prejudice

Applicant does not use cumulative error as a substitute for proving individual error. He submits that where multiple preserved non-structural errors affected notice, self-representation, language access, evidentiary rulings, jury instructions, corporate attribution, and sentencing, the reviewing court must consider whether their combined effect undermined the fairness and reliability of the proceedings.

VI. PRESERVATION AND PREJUDICE: WHEN, WHERE, WHY, AND HOW

Applicant's showing is not limited to labels. The alleged prejudice arose at identifiable stages: pretrial, when revocation and detention allegedly restricted preparation and access; January 2025 pretrial proceedings, when suppression, charging, interpreter, and continuance issues were litigated; trial, when Applicant represented himself, challenged conspiracy structure, evidence, jury instructions, and sufficiency; sentencing, when disputed loss and restitution information changed and language-access and record issues persisted; and appellate proceedings, when notice and record-completeness disputes affected the ability to obtain merits review.

The asserted mechanism of prejudice is likewise concrete. Applicant contends that inadequate notice deprived him of opportunities to respond; detention impaired pro se preparation and discovery access; language-access deficiencies impaired comprehension and participation; alleged evidentiary and instruction errors affected what the jury could consider and the legal framework it applied; aggregation of separate corporate activity affected proof of criminal proceeds, loss, restitution, and relevant conduct; and record omissions impaired the reviewing court's ability to evaluate preserved claims. The merits court must determine whether each asserted error was preserved, the applicable standard of review, and whether the required prejudice or structural consequence is established.

VII. FLIGHT RISK, DANGER, AND PROPOSED CONDITIONS

Applicant does not rely on an inaccurate assertion that he has literally no prior dispositions. The Final Presentence Investigation Report calculated zero criminal-history points and Criminal History Category I; it also reported two 2012 traffic-related dispositions receiving zero points. Applicant recognizes that the PSI contains disputed obstruction-related and witness-interference allegations. Those allegations must be addressed rather than ignored.

Applicant proposes stringent conditions sufficient to address the statutory concerns, including home detention, GPS or other electronic monitoring, surrender of passports and travel documents, geographic restrictions, regular reporting, prohibition on contact with witnesses or codefendants except as authorized, restrictions on financial or business activity if deemed appropriate, third-party custodianship, and any additional condition the Court considers necessary. Applicant submits that the availability of enforceable conditions materially reduces the asserted risks while preserving the presumption of detention required by § 3143(b).

VIII. GOOD FAITH AND ABSENCE OF DELAY

The procedural history demonstrates persistent attempts to obtain appellate review rather than to postpone it. After dismissal of No. 25-40043, Applicant sought to respond out of time, requested counsel, moved to reinstate, sought reconsideration, pursued record correction, and filed the certiorari petition. The present application is submitted in good faith to preserve meaningful review while the petition remains pending and the Government prepares the response requested by the Court.

IX. NO MATERIAL PREJUDICE TO THE GOVERNMENT FROM CONDITIONAL RELEASE

Conditional release would not vacate the conviction, decide the certiorari petition, resolve the merits, or prevent the Government from defending the judgment. The Government's litigation position would remain intact. Any legitimate concerns regarding appearance, contact, travel, witnesses, or financial activity can be addressed by tailored conditions. By contrast, continued incarceration during potentially dispositive review cannot later be restored to Applicant if the conviction or sentence is vacated. Applicant therefore submits that carefully conditioned release can preserve both the Government's interests and the effectiveness of judicial review.

X. REMEDIAL AUTHORITY, JUDICIAL ECONOMY, AND ALTERNATIVE RELIEF

Applicant further asks that the Court preserve the broadest lawful remedy if review is granted. Under 28 U.S.C. § 2106, an appellate court may affirm, modify, vacate, set aside, or reverse a judgment lawfully brought before it for review and may remand with appropriate directions. Applicant recognizes the jurisdictional boundary: the filing of a certiorari petition does not automatically place every district-court ruling, later appellate proceeding, or the underlying conviction independently before this Court.

Judicial economy therefore operates as a remedial consideration, not an independent source of jurisdiction. If a dispositive issue properly before the Court permits final relief on the existing record, unnecessary repetitive proceedings should be avoided. If further factfinding, record reconstruction, or Fifth Circuit consideration is required, the Court may instead vacate the judgment properly before it and remand with appropriate instructions. Applicant requests the broadest relief jurisdictionally available while expressly preserving narrower vacatur-and-remand relief.

The practical relationship between the lost appeal and the underlying criminal judgment matters to the release analysis. Applicant does not seek restoration of an appellate docket for its own sake. He seeks review of preserved questions capable, if resolved in his favor, of producing acquittal, a new trial, resentencing, or other qualifying relief. That connection supplies the required outcome nexus more directly than the procedural reinstatement question standing alone.

XI. MOTION FOR LEAVE

Applicant respectfully requests leave to file this renewed application and supplemental appendix because the September 14 district-court order, Applicant's subsequent receipt of that order, and the Court-requested Government response postdate or materially clarify the circumstances addressed by earlier release requests. The filing is not intended to relitigate unchanged matters; it presents the developed procedural posture and consolidates the substantial preserved issues relevant to § 3143(b).

XII. RELIEF REQUESTED

Applicant respectfully requests that the Circuit Justice or Court:

- grant leave to file this renewed application and supplemental appendix;
- grant release pending disposition of the petition for a writ of certiorari, subject to appropriate conditions under 18 U.S.C. § 3142(c);
- alternatively, refer the application to the Court and request such expedited response as the Court deems appropriate;
- if certiorari is granted, exercise the remedial authority available under 28 U.S.C. § 2106 to grant the broadest relief lawfully supported by the questions properly before the Court and the record, including vacatur, reversal, or remand with appropriate directions;
- where additional factual development or record settlement is necessary, direct appropriate completion, supplementation, reconstruction, or lower-court consideration; and

- grant such other relief as is just and proper.

Respectfully submitted,

/s/ Olamide Olatayo Bello

Olamide Olatayo Bello

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FCI Texarkana

P.O. Box 7000

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Dated: September 25, 2026

CERTIFICATE / DECLARATION OF SERVICE AND FILING

I, Olamide Olatayo Bello, Reg. No. 65100-510, Petitioner/Applicant pro se, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that on September 25, 2026, I caused a true and correct copy of the Motion for Leave to File and Renewed Application for Release Pending Disposition of Petition for Writ of Certiorari, with Supplemental Appendix, in No. 26-5206 to be transmitted by email to counsel of record for Respondent at:

D. John Sauer

Counsel of Record, Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
SUPREMECTBRIEFS@USDOJ.GOV
Telephone: 202-514-2217

I further declare that on September 25, 2026, I placed the filing in the institution internal mail system for mailing to the Clerk of the Supreme Court of the United States at:

Clerk of the Court

Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2026.

/s/ Olamide Olatayo Bello

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**Additional material
from this filing is
available in the
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