FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

AUG 26 2025

MITCHELL R. ELFERS
CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CRIMINAL NO. 25-3358 SMD
	)	
vs.	)	Count 1: 8 U.S.C. §§ 1324(a)(1)(A)(v) and (a)(2)(B)(ii): Conspiracy to Bring in Illegal Aliens for Financial Gain;
JALAL MAKLAD ADEEB and [redacted]	)	
	)	Count 2: 8 U.S.C. §§ 1324(a)(2)(B)(ii): Bringing Aliens to the United States for Financial Gain; 8 U.S.C. § 1324(a)(1)(A)(v)(II): Aiding and Abetting.
Defendants.	)	

INDICTMENT

The Grand Jury charges:

Count 1

On or about August 3, 2024, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **JALAL MAKLAD ADEEB** and [redacted] unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 8 U.S.C. § 1324(a)(2)(B)(ii), specifically, bringing aliens to the United States for financial gain.

In violation of 8 U.S.C. §§ 1324(a)(1)(A)(v) and (a)(2)(B)(ii).

Count 2

On or about August 3, 2024, in Doña Ana County, in the District of New Mexico, the defendants, **JALAL MAKLAD ADEEB** and [redacted] knowing and in reckless disregard of the fact that an alien, namely, R.H., had not received prior official authorization to come to, enter and reside in the United States, did bring

and attempt to bring to the United States said alien, for the purpose of commercial advantage and private financial gain.

In violation of 8 U.S.C. §§ 1324(a)(2)(B)(ii) and (a)(1)(A)(v)(II).

A TRUE BILL:

/S/

FOREPERSON OF THE GRAND JURY

Assistant United States Attorney