

FILED

7/11/2024

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: CO
Deputy

Case No: 4:24-CR-00206

UNITED STATES OF AMERICA,

Plaintiff,

v.

**JACKIE NICHOLE HALL, (1), &
JOHN CHRISTOPHER RAMIREZ, (2),**

Defendants.

INDICTMENT

Count 1: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I) & (B)(i), Conspiracy to Transport Illegal Aliens

Count 2: 8 U.S.C. §§ 1324(a)(1)(A)(ii), (v)(II) & (B)(i), Aiding and Abetting the Transportation of Illegal Aliens for financial gain

Count 3: 18 U.S.C. §§ 111(a)(1), Assaulting, Resisting or Impeding Officer of the United States with Physical Contact

THE GRAND JURY CHARGES:

COUNT ONE

On or about July 7, 2024, in the Western District of Texas, Defendants,

**JACKIE NICHOLE HALL, (1),
and
JOHN CHRISTOPHER RAMIREZ, (2),**

did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit the following offense against the United States: to transport and move, and attempt to transport and move, within the United States, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law.

A violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and (B)(i).

COUNT TWO

On or about July 7, 2024, in the Western District of Texas, Defendants,

JACKIE NICHOLE HALL, (1),
and
JOHN CHRISTOPHER RAMIREZ, (2),

aiding and abetting one another, knowing and in reckless disregard of the fact that certain aliens had come to, entered, and remained in the United States in violation of law, and with the intent to further the aliens' unlawful presence in the United States, did transport and move, and attempted to transport and move said aliens within the United States for commercial advantage and private financial gain.

A violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), (v)(II) and (B)(i).

COUNT THREE

On or about July 7, 2024, in the Western District of Texas, Defendant,

JACKIE NICHOLE HALL, (1),


did forcibly assault, resist, oppose, impede, intimidate, and interfere with any person designated in 18 U.S.C. § 1114, to wit: Homeland Security Investigations Special Agent John Doe #1 who was engaged in official duties and caused physical contact by striking his hands.

A violation of Title 18, United States Code, Sections 111(a)(1).

A TRUE BILL.


FOREPERSON OF THE GRAND JURY

BY: JAIME ESPARZA
UNITED STATES ATTORNEY



KEVIN CAYTON
ASSISTANT UNITED STATES ATTORNEY