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United States District CourtFor the Western District of Texas
Austin Division**FILED**

June 25, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: sec
DEPUTY

United States of America,

v.

Jamil Bahlouli§
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§

Case Number:

1:25-MJ-00683**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about **June 25, 2025**, in the county of **Travis** in the Western District of Texas, the defendant, **Jamil Bahlouli**, violated Title 8, United States Code section 1253(a)(1)(C).


This criminal complaint is based upon the following facts:

Title 8, United States Code, Section 1253(a)(1)(C) makes it a crime for: “Any alien against whom a final order of removal is outstanding by reason of being a member of any of the classes described in section 1227(a) of this title...[to] connive[] or conspire[], or take[] any other action, designed to prevent or hamper or with the purpose of preventing or hampering the alien’s departure pursuant to such [final order of removal].”

Jamil BAHLOULI is an Iranian citizen and an alien of the United States. He entered the United States illegally and was previously removed from the United States to Canada on or about October 14, 2021, pursuant to a final order of removal issued on or about October 19, 2020.

After being removed, BAHLOULI unlawfully and illegally re-entered the United States without having obtained permission from the Attorney General of the United States or the Secretary for Homeland Security to reapply for admission. He was found in the United States on or about December 15, 2023, and charged by Complaint with Illegal Re-Entry in violation of 8 U.S.C. § 1326 in the District of Montana. He then charged by Information with Illegal Entry in violation of 8 U.S.C. § 1325(a)(1) and was convicted of that offense on or about January 5, 2024. Defendant was sentenced to time served with no supervised release. The 2020 final order of removal was reinstated on or about December 15, 2023. Following his conviction and sentencing, BAHLOULI was released into the United States and scheduled to report in person to the Immigration and Customs Enforcement office in San Antonio, TX on or about **January 23, 2024**. BAHLOULI did not report as scheduled.

On or about **June 25, 2025**, a deportation officer located the defendant in Austin, Texas, which is in the Western District of Texas, and subsequent queries identified the defendant as a previously removed alien. Deportation officers located and attempted to arrest the defendant in order to effect his removal pursuant to the outstanding final order of removal. Deportation officers went to BAHLOULI’s residence, encountered him in the doorway of his residence, and attempted to arrest him. Defendant refused to be arrested and took an action designed to prevent or hamper his deportation and departure pursuant to the outstanding final order of removal by slamming the door on the deportation officers, remaining inside his residence, and refusing to exit his residence.



Signature of Complainant (S. Meade)
Deportation Officer
Immigration and Customs Enforcement

Submitted and sworn to electronically and signed by me
pursuant to Fed. R. Crim P. 4.1 and 4(d)

June 25, 2025

Date

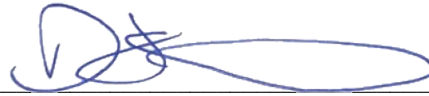
at

Austin, Texas

City and State

Dustin Howell
United States Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer