

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:25-Mj-02153-Louis

UNITED STATES OF AMERICA

v.

MALEAK EDDEN,

Defendant.

FILED BY OG D.C.

Jan 24, 2025

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - Miami

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

Respectfully submitted,

MICHAEL S. DAVIS  
ACTING UNITED STATES ATTORNEY

By: /s/TANNER P. STIEHL  
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AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

United States of America

v.

MALEAK EDDEN,

Case No. 1:25-mj-02153-Louis

Defendant.

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 the date(s) of January 21, 2025 in the county of Miami-Dade in the Southern District of Florida, the defendant(s) violated:

Code Section
8 U.S.C. § 1324(a)(1)(A)(iv)

Offense Description
Encouraging and Inducing an Alien to Enter the United States

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Complainant's signature

Jacob A. Amole, Special Agent HSI
Printed name and title

Sworn to before me and signed in my presence.

Date:

1/24/25

Judge's signature

City and state: Miami, Florida

Honorable Lauren F. Louis, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jacob A. Amole, being duly sworn, do hereby depose and state the following:

**INTRODUCTION**

1. I am employed as a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations, in Miami, Florida, and have been so employed since January 2023. I am currently assigned to the Human Smuggling Group, where I am responsible for investigating matters within the jurisdiction of the United States Department of Homeland Security, including violations of the immigration and customs laws of the United States. Prior to being employed with HSI, I served on active duty in the U.S. Navy for 11 years as a Cryptologic Technician supporting multiple National Security Agency missions both foreign and domestic and attained a bachelor's degree in Homeland Security. I have completed the Criminal Investigator Training Program and HSI Special Agent Training Program at the Federal Law Enforcement Training Center regarding the proper investigative techniques, including the application for and execution of search, arrest, and seizure warrants, for violations of federal laws including Title 8, United States Code, Sections 1324 and 1326.

2. The statements contained in this affidavit are based upon my own personal knowledge of this investigation, my previous training and experience, and based on information obtained in writing or orally from other people, including other law enforcement officials and other federal officials. Because this affidavit is being submitted in support of a criminal complaint, I have not included each and every fact known to law enforcement. I have set forth only the facts that I believe are necessary to establish probable cause.

3. I submit this affidavit in support of a criminal complaint against Maleak Joshua James EDDEN (“EDDEN”), because there is probable cause to believe EDDEN did knowingly encourage and induce aliens to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence is and will be in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

**FACTS IN SUPPORT OF PROBABLE CAUSE**

4. On or about January 21, 2025, at approximately 8:00 P.M., HSI was advised by Customs and Border Protection (“CBP”) Air and Marine Operations (“AMO”) of a SUSPECT VESSEL identified by AMO Aircraft heading westbound towards the United States approaching the 12 nautical mile line off the coast of Miami, Florida. Multiple individuals were visible on the deck of the SUSPECT VESSEL, from the aircraft.

5. Once in the United States Territorial Seas, CBP AMO Aircraft directed CBP AMO Miami Marine Unit (MMU) to a point of intercept at which time the CBP AMO agents approached the SUSPECT VESSEL. When the agents approached the SUSPECT VESSEL, they energized their lights and sirens, but EDDEN refused to stop. When warning shots were deployed, EDDEN refused to stop the SUSPECT VESSEL. It was only after agents shot one of the SUSPECT VESSEL’S engine, that EDDEN stopped. Agents were able to see that EDDEN was the one driving the vessel during the pursuit.

6. When the SUSPECT VESSEL was interdicted it was approximately two (2) nautical miles from the shoreline of Miami-Dade County, Florida, near Haulover Beach. The interdiction occurred on or about January 21, 2025, at approximately 8:20 P.M.

7. CBP AMO officers boarded the vessel, identified as 28-foot white cuddy cabin vessel bearing Florida registration number FL2074GX. CBP AMO officers encountered a total of

16 individuals aboard the vessel, to include the vessel operator, EDDEN, who was a Bahamian national. The remaining 15 occupants were from various countries. One individual appeared to be in respiratory distress and was medically evacuated for higher level medical care. The remaining 15 individuals were transferred to the United States Coast Guard (“USCG”) Cutter for further identification. The results of these checks and my research indicated that all 16 of the individuals did not have any proper immigration documentation or permission to enter the United States on or about January 21, 2025.


8. On or about January 24, 2025, at approximately 9:00 A.M., the USCG first brought EDDEN ashore at the USCG Base in Miami Beach, Florida, the first place in which EDDEN entered the Southern District of Florida. EDDEN was transferred to CBP custody for immigration processing, which includes the taking of biometrics to confirm the previous findings.

9. During a recorded, post-*Miranda* interview, EDDEN stated he accepted a job in which he was supposed to receive \$20,000 to drive a boat of people from the Bahamas to the United States. EDDEN was instructed to follow the GPS plot line to the United States, drop off the people on board the vessel in the United States then travel back to Bimini, Bahamas. EDDEN stated that when law enforcement approached the vessel, they activated their lights and sirens at which time he did not know what to do so he continued traveling until law enforcement shot out one of the engines on the vessel he was operating. EDDEN also stated that he was the only individual driving the vessel from Bimini, Bahamas to the United States.

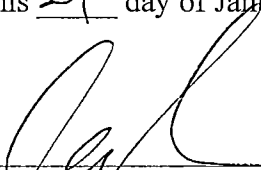
[REMAINDER INTENTIONALLY LEFT BLANK]

15. Based on the foregoing facts, your affiant respectfully submits that there is probable cause to believe that EDDEN encouraged and induced aliens to enter the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

**FURTHER AFFIANT SAYETH NAUGHT.**

  
\_\_\_\_\_  
JACOB A. AMOLE  
SPECIAL AGENT  
HOMELAND SECURITY INVESTIGATIONS

Sworn to before me and signed in my presence  
this 24 day of January, 2025.

  
\_\_\_\_\_  
HONORABLE LAUREN F. LOUIS  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF FLORIDA