

United States Court of Appeals
For the Eighth Circuit

No. 25-2159

United States of America

Plaintiff - Appellee

v.

Harshkumar Ramanlal Patel, also known as Dirty Harry, also known as Harry Patel, also known as Param Singh, also known as Haresh Rameshlal Patel, also known as Harshkumar Singh Patel

Defendant - Appellant

Appeal from United States District Court
for the District of Minnesota

Submitted: September 17, 2026
Filed: October 5, 2026
[Unpublished]

Before L.R. SMITH, GRUENDER, and SHEPHERD, Circuit Judges.

PER CURIAM.

Harshkumar Patel, who is proceeding pro se, appeals the judgment entered and sentence imposed by the district court¹ after a jury found him guilty of human smuggling offenses.

Upon careful review, we conclude that there was sufficient evidence to support the jury verdict. See United States v. Oliver, 90 F.4th 1222, 1224 (8th Cir. 2024) (standard of review). We also conclude that Patel’s arguments challenging the district court’s Guidelines calculations lack merit. The district court did not plainly err in applying an enhancement for creating a substantial risk of death. See United States v. Isler, 983 F.3d 335, 341 (8th Cir. 2020) (standard of review). Further, the district court did not err in applying an enhancement for the offense resulting in death. See United States v. Chambers, 133 F.4th 812, 817 (8th Cir. 2025); United States v. Flores-Flores, 356 F.3d 861, 862-63 (8th Cir. 2004).

As to his arguments that the charges in the indictment were duplicitous and multiplicitous, we conclude that Patel is not entitled to relief because he failed to preserve these issues for appeal. See United States v. Paul, 885 F.3d 1099, 1104 (8th Cir. 2018); United States v. Fry, 792 F.3d 884, 888-89 (8th Cir. 2015). Finally, we conclude that the arguments Patel presented in support of his contention that his convictions on two of the counts were “mutually inconsistent” do not provide a basis for relief. Accordingly, we affirm.

¹The Honorable John R. Tunheim, United States District Judge for the District of Minnesota.