

UNITED STATES DISTRICT COURT

for the
District of Maryland

☒ FILED ☐ ENTERED
☐ LOGGED ☐ RECEIVED
 4:37 pm, Jun 23 2026
 AT BALTIMORE
 CLERK, U.S. DISTRICT COURT
 DISTRICT OF MARYLAND
 BY ☐ DG ☐ Deputy

United States of America
v.OSVALDO ALQUEJAY-CORDOVA,
a/k/a "OSWALDO ALQUEJAY-CORDOVA"

Case No. 1:26-mj-01567-DRM

Defendant(s)

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 May 16, 2026 in the county of Wicomico in the
 District of Maryland, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1326(a)

Reentry after removal

This criminal complaint is based on these facts:

See Attached Affidavit in Support of a Criminal Complaint.

☒ Continued on the attached sheet.

Carly Adams

Complainant's signature

Carly Adams, Deportation Officer (ICE)

Printed name and title

Attested to by the applicant in accordance with the requirements of
Fed R. Crim P. 4.1 by telephone.Date: June 23, 2026

Judge's signature

City and state: Baltimore, Maryland

Hon. Douglas R. Miller, U.S. Magistrate Judge

Printed name and title

KYH

✓
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 FOR THE DISTRICT OF MARYLAND**

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AT BALTIMORE
 CLERK, U.S. DISTRICT COURT
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UNITED STATES OF AMERICA

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CASE NO. 1:26-mj-01567-DRM

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OSVALDO ALQUEJAY-CORDOVA,

*

a/k/a "OSWALDO ALQUEJAY-
CORDOVA"

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Carly Adams, Deportation Officer with United States Immigration and Customs Enforcement, being duly sworn, deposes and states the following:

1. I am a Deportation Officer with United States Immigration and Customs Enforcement ("ICE") and have served in that capacity since December 28, 2025. I am authorized by law to interrogate, arrest, search, and seize aliens who are unlawfully present in the United States pursuant to Title 8, United States Code, Section 1357. Throughout my career, I have been involved in the investigation of numerous cases involving the illegal reentry of aliens into the United States.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the ICE investigative file, including the defendant's criminal history record; and from reports of other enforcement officers involved in the investigation.

3. Because I have submitted this Affidavit for the limited purpose of establishing probable cause, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause.

4. This Affidavit is submitted in support of a criminal complaint and arrest warrant for Osvaldo **ALQUEJAY**-Cordova, charging him with reentry after removal in violation of 8 U.S.C. § 1326(a).

PROBABLE CAUSE

5. **ALQUEJAY** is a citizen and national of Guatemala, and not a native, citizen or national of the United States.

6. At an unknown date and time before January 25, 2018, **ALQUEJAY** entered the United States at or near Roma, Texas, without inspection by an immigration officer. On January 26, 2018, an Immigration Judge in the state of Texas ordered **ALQUEJAY** be removed from the United States to Guatemala. On or about February 1, 2018, **ALQUEJAY** was removed from the United States via ICE Air from Valley International Airport to Guatemala.

7. On or about May 16, 2026, at approximately 6:30 a.m., ICE officers from the Salisbury, Maryland Fugitive Operations Unit were conducting targeted enforcement in the area of Carrollton Avenue in Salisbury. While stopped at a red light at the intersection of Route 13 and Naylor Mill Road, officers saw a white Kia Optima bearing Maryland registration 74419CL (the “Kia”) arrive at the light. Officers recognized the Kia, which is registered to **ALQUEJAY**, based on prior surveillance of **ALQUEJAY** at his known residence: 144 Francis Drive, Salisbury, Maryland. Based on that prior surveillance, officers also know **ALQUEJAY** was a Guatemalan national who had been previously removed from the United States. Notably, at the time the Kia approached the light, officers were not looking for **ALQUEJAY** or his car; the encounter was purely by chance.

8. As the Kia approached the red light, the car suddenly backed up and drove away, swerving into oncoming traffic. As noted, officers were not attempting to stop the vehicle at the

time, but after it pulled away, officers pursued and stopped the Kia. Officers conducted a field interview and identified the driver as **ALQUEJAY**. During the field interview, officers also established **ALQUEJAY**'s alienage and removability, and officers then took him into custody. During a search incident to arrest, officers further discovered a Maryland Driver's license confirming **ALQUEJAY**'s identity.

9. **ALQUEJAY** was fingerprinted. An ICE official with fingerprint analysis training compared the fingerprints taken in connection with the defendant's May 16, 2026, arrest with the fingerprints taken in connection with the defendant's January 25, 2018, removal and determined that both sets of fingerprints were made by the same individual.

10. There is no record that, following the prior deportation, the defendant ever obtained permission to reenter the United States from the Secretary for Homeland Security, the United States Attorney General, or any other authorized official.

CONCLUSION

11. Accordingly, pursuant to the facts set forth above, I submit that probable cause exists for the issuance of a criminal complaint and warrant for the arrest of Osvaldo **ALQUEJAY** -Cordova, an alien who previously had been removed, knowingly entered and was found in the United States without having obtained the express consent of the Attorney General of the United States or his successor, the Secretary for Homeland Security, to reapply for admission in the United States as required by law, in violation of 8 U.S.C. § 1326(a).

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Carly Adams

Carly Adams
Deportation Officer
U.S. Immigration and Customs Enforcement

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d) this 23rd day of June, 2026.

Douglas R. Miller

The Honorable Douglas R. Miller
United States Magistrate Judge

