

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of MarylandUnited States of America
v.
MELVIN ESCOBAR RODRIGUEZ

Case No. 1:26-mj-01115-CJC

FILED
LODGED
ENTERED
RECEIVED
MAY 07 2026
AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

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 March 14, 2026 in the county of Wicomico in the
 District of Maryland, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 U.S.C. § 1326(a)	Reentry of Removed Alien

This criminal complaint is based on these facts:

Please see Affidavit of Carly Adams, a Deportation Officer with U.S. Immigration and Customs Enforcement ("ICE"), which is attached hereto and incorporated herein by reference.

☒ Continued on the attached sheet.Carly Adams

Complainant's signature

Deportation Officer Carly Adams, ICE

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/07/2026City and state: Baltimore, MarylandChelsea J. Crawford

Judge's signature

Hon. Chelsea J. Crawford, U.S. Magistrate Judge

Printed name and title



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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

MELVIN ESCOBAR RODRIGUEZ

CRIMINAL NO. 1:26-mj-01115-CJC

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Carly Adams, being duly sworn, depose and state 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 and other violations of the Immigration and Nationality Act ("INA").

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, which includes the defendant's criminal history record; and from reports of other law 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.

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4. This Affidavit is submitted in support of a criminal complaint and arrest warrant for Melvin Escobar Rodriguez ("**ESCOBAR RODRIGUEZ**") charging him with one count of Reentry of Removed Alien in violation of 8 U.S.C. § 1326(a).

PROBABLE CAUSE

5. **ESCOBAR RODRIGUEZ** is a citizen and national of Honduras, and is not a native, citizen, or national of the United States.

6. On or about December 31, 2000, **ESCOBAR RODRIGUEZ** illegally entered the United States by crossing over the Rio Grande River near Brownsville, Texas, without inspection, admission, or parole by an Immigration Officer.¹ On January 2, 2001, **ESCOBAR RODRIGUEZ** was apprehended by United States Customs and Border Protection ("CBP") agents south of the CBP checkpoint in Sarita, Texas. Due to the fact that there was no camp space available at the Port Isabel Service Processing Center, a designated immigration official issued and served **ESCOBAR RODRIGUEZ** with a Notice to Appear (Form I-862) for an immigration hearing scheduled for June 18, 2001, at 9:00 a.m., at 201 East Jackson Street in Harlingen, Texas. On June 18, 2001, after **ESCOBAR RODRIGUEZ** failed to appear at his immigration hearing, Immigration Judge Howard Achtsam ordered **ESCOBAR RODRIGUEZ** to be removed from the United States in absentia. On July 6, 2001, E.M. Trominski, the District Director of the United States Immigration and Naturalization Service ("INS"), issued a Warrant of Removal/Deportation (Form I-205) for **ESCOBAR RODRIGUEZ** to be removed from the United States.

7. On October 1, 2006, **ESCOBAR RODRIGUEZ** was arrested by State Troopers with the Maryland Department of State Police and charged with the following controlled substances offenses: one count of conspiracy and manufacturing, distributing, or dispensing a

¹ This information was obtained from the Record of Deportable/Inadmissible Alien (Form I-213) documenting **ESCOBAR RODRIGUEZ**'s statements to Border Patrol Agent Toribio Martinez on January 2, 2001.

LNE
TCP USAO #2026R00216

controlled substance, in violation of the common law of Maryland and Maryland Criminal Code § 5-602(1), graded as a felony; one count of conspiracy and possession with intent to distribute a controlled substance, in violation of the common law of Maryland and Maryland Criminal Code § 5-602(2), graded as a felony; and two counts of possessing a controlled substance, in violation of Maryland Criminal Code § 5-601(a)(1), graded as a misdemeanor. On April 5, 2007, Immigration Enforcement Agent ("IEA") Joe Abbott encountered **ESCOBAR RODRIGUEZ** at the Wicomico County Detention Center located in Salisbury, Maryland, where **ESCOBAR RODRIGUEZ** informed IEA Agent Abbott that he was a citizen and national of Honduras and did not possess any documentation allowing him to enter or remain in the United States. On August 9, 2007, the aforementioned criminal charges were nolle prosequi in the Circuit Court for Wicomico County. **ESCOBAR RODRIGUEZ** was subsequently transported to San Antonio, Texas, and was removed from the United States to Honduras via ICE Air Operations on September 26, 2007.

8. On or about October 15, 2007, **ESCOBAR RODRIGUEZ** illegally reentered the United States near Port Isabel, Texas, without inspection, admission, or parole by an Immigration Officer.² On April 18, 2008, **ESCOBAR RODRIGUEZ** was arrested by State Troopers with the Delaware State Police and charged with the following criminal offenses: one count of forgery in the second degree, in violation of Del. Code Ann. tit. 11, § 861(b)(2)(c), graded as a class G felony; one count of criminal impersonation, in violation of Del. Code Ann. tit. 11, § 907, graded as a class A misdemeanor; one count of driving without a license, in violation of Del. Code Ann. tit. 21, § 4177; one count of failure to possess a registration card, in violation of Del. Code Ann. tit. 21, § 2108; one count of speeding, in violation of Del. Code Ann. tit. 21, § 4169(4); and one count of driving a vehicle while under the influence of alcohol ("DUI"), in violation of Del. Code Ann.

² This information was obtained from **ESCOBAR-RODRIGUEZ's** signed sworn statement to ICE Deportation Officer David Savina on May 1, 2008.

LNE
TCP USAO #2026R00216

tit. 21, § 4177(a)(1). On April 21, 2008, ICE Enforcement and Removal Operations (“ERO”) officers encountered **ESCOBAR RODRIGUEZ** at the Sussex Correctional Institution in Georgetown, Delaware. On April 22, 2008, fingerprint impressions were obtained from **ESCOBAR RODRIGUEZ** and were later confirmed to be a positive match to the fingerprint impressions taken from **ESCOBAR RODRIGUEZ** when he was previously arrested on January 2, 2001, for unlawfully entering the United States. On April 24, 2008, **ESCOBAR RODRIGUEZ** was convicted of the aforementioned criminal offenses in the Sussex County Court of Common Pleas and sentenced to the following: thirty days of imprisonment, which was suspended to six months of probation, for the charge of criminal impersonation; sixty days of imprisonment, which was suspended to one year of unsupervised probation, for the charge of DUI; and ordered to pay a fine for the charge of driving without a license. On May 1, 2008, ICE Deportation Officer David Savina issued and served **ESCOBAR RODRIGUEZ** with a Notice of Intent/Decision to Reinstate a Prior Removal Order (Form I-871) for violating Section 241(a)(5) of the INA for the second time, which **ESCOBAR RODRIGUEZ** did not contest. **ESCOBAR RODRIGUEZ** was subsequently transported to Harlingen, Texas, and was removed from the United States to Honduras via ICE Air Operations on June 11, 2008.

9. On or about September 21, 2008, **ESCOBAR RODRIGUEZ** illegally reentered the United States by swimming across the Rio Grande River near the CBP Port of Entry in Hidalgo, Texas, without inspection, admission, or parole by an Immigration Officer.³ On September 26, 2008, CBP agents encountered **ESCOBAR RODRIGUEZ** north of the CBP checkpoint near Falfurrias, Texas, where **ESCOBAR RODRIGUEZ** admitted to CBP agents that he was a citizen and national of Honduras and did not possess any documentation allowing him to enter or remain

³ This information was obtained from **ESCOBAR-RODRIGUEZ**’s signed sworn statement to Border Patrol Agent Santiago Chavez on September 3, 2009.

LNE
TCP USAO #2026R00216

in the United States. Border Patrol Agent Santiago Chavez later issued and served **ESCOBAR RODRIGUEZ** with a Notice of Intent/Decision to Reinstate a Prior Removal Order (Form I-871) for violating Section 241(a)(5) of the INA for the third time, which **ESCOBAR RODRIGUEZ** did not contest. **ESCOBAR RODRIGUEZ** was subsequently transported to San Antonio, Texas, and was removed from the United States to Honduras via ICE Air Operations on October 24, 2008.

10. On or about November 25, 2008, **ESCOBAR RODRIGUEZ** illegally reentered the United States near McAllen, Texas, without inspection, admission, or parole by an Immigration Officer.⁴ On December 11, 2008, **ESCOBAR RODRIGUEZ** was found in violation of his probation for his aforementioned criminal case in the Sussex County Court of Common Pleas. On September 3, 2009, the Dover ICE ERO Fugitive Operations Unit encountered **ESCOBAR RODRIGUEZ** during a vehicle stop near 117 Delaware Avenue, located in Salisbury, Maryland. **ESCOBAR RODRIGUEZ** informed ICE law enforcement officers that he was a citizen and national of Honduras and had previously been deported from the United States. **ESCOBAR RODRIGUEZ** was transported to the ICE field sub-office in Dover, Delaware, where ICE Officer Savina issued and served **ESCOBAR RODRIGUEZ** with a Notice of Intent/Decision to Reinstate a Prior Removal Order (Form I-871) for violating Section 241(a)(5) of the INA for the fourth time, which **ESCOBAR RODRIGUEZ** did not contest. **ESCOBAR RODRIGUEZ** was subsequently transported to the John F. Kennedy Airport in Queens, New York, and was removed from the United States to Honduras via ICE Air Operations on October 28, 2009.

11. On or about November 28, 2010, **ESCOBAR RODRIGUEZ** illegally reentered the United States by swimming across the Rio Grande River near Roma, Texas, without inspection,

⁴ This information was obtained from the Record of Deportable/Inadmissible Alien (Form I-213) and other ICE documentation associated with this particular enforcement event.

LNE
TCP USAO #2026R00216

admission, or parole by an Immigration Officer.⁵ On November 29, 2010, CBP agents encountered **ESCOBAR RODRIGUEZ** near Hebbronville, Texas. Upon learning that **ESCOBAR RODRIGUEZ** was a citizen and national of Honduras, with no legal right to enter or remain in the United States, CBP agents transported **ESCOBAR RODRIGUEZ** to the Hebbronville Border Patrol Station for immigration processing. On November 30, 2010, Border Patrol Agent Jorge Fuentes issued and served **ESCOBAR RODRIGUEZ** with a Notice of Intent/Decision to Reinstate a Prior Removal Order (Form I-871) for violating Section 241(a)(5) of the INA for the fifth time, which **ESCOBAR RODRIGUEZ** did not contest. **ESCOBAR RODRIGUEZ** was subsequently transported to San Antonio, Texas, and was removed from the United States to Honduras via ICE Air Operations on December 22, 2010.

12. On or about October 28, 2011, **ESCOBAR RODRIGUEZ** illegally reentered the United States by walking across the southern border at an unknown location in Texas without inspection, admission, or parole by an Immigration Officer.⁶ On October 29, 2011, State Troopers with the North Carolina State Highway Patrol encountered **ESCOBAR RODRIGUEZ** and eleven other illegal aliens while conducting a traffic stop on a white passenger van, bearing a temporary Texas license plate registration, in Durham County, North Carolina. Believing that the van may have been involved in a human smuggling crime, Trooper McClain contacted Special Agent Christopher Brant with Homeland Security Investigations ("HSI") who then responded to the scene of the traffic stop with other HSI agents. Once HSI agents had determined that all twelve individuals were unlawfully present in the United States, **ESCOBAR RODRIGUEZ** was

⁵ This information was obtained from **ESCOBAR-RODRIGUEZ**'s signed sworn statement to Border Patrol Agent Jorge Fuentes on November 30, 2010.

⁶ This information was obtained from **ESCOBAR-RODRIGUEZ**'s signed sworn statement to ICE Deportation Officer Koby Williams on November 30, 2011.

LNE
TCP USAO #2026R00216

transported to the Alamance County Detention Center in Burlington, North Carolina, where Agent Brant later issued and served **ESCOBAR RODRIGUEZ** with a Notice of Intent/Decision to Reinstate a Prior Removal Order (Form I-871) for violating Section 241(a)(5) of the INA for the sixth time, which **ESCOBAR RODRIGUEZ** did not contest. **ESCOBAR RODRIGUEZ** was subsequently transported to Atlanta, Georgia, and was removed from the United States to Honduras via ICE Air Operations on December 5, 2011.

13. At an unknown date and time before March 14, 2023, **ESCOBAR RODRIGUEZ** illegally reentered the United States at an unknown location without inspection, admission, or parole by an Immigration Officer. On March 14, 2023, the Salisbury ICE ERO Fugitive Operations Unit encountered **ESCOBAR RODRIGUEZ** during a surveillance of a separate target. On March 15, 2023, ICE Supervisory Deportation and Detention Officer David Graham issued a Warrant of Removal/Deportation (Form I-205) for **ESCOBAR RODRIGUEZ**. On March 21, 2023, the Salisbury ICE ERO Fugitive Operations Unit observed **ESCOBAR RODRIGUEZ** operating a 2008 Chevrolet van, bearing Maryland license plate registration number 5DJ8202, which was registered to **ESCOBAR RODRIGUEZ** and was previously seen by ICE Deportation Officer Christopher Twigg leaving **ESCOBAR RODRIGUEZ**'s last known address. Moments later, ICE Officer Twigg and ICE Officer Graham conducted a vehicle stop on the 2008 Chevrolet van and positively identified **ESCOBAR RODRIGUEZ**. ICE Officer Twigg later issued and served **ESCOBAR RODRIGUEZ** with a Notice of Intent/Decision to Reinstate a Prior Removal Order (Form I-871) for violating Section 241(a)(5) of the INA for the seventh time. **ESCOBAR RODRIGUEZ** was subsequently transported to Mesa, Arizona, and was removed from the United States to Honduras via ICE Air Operations on April 19, 2023.

LNE
TCP USAO #2026R00216

14. At an unknown date and time before March 14, 2026, **ESCOBAR RODRIGUEZ** illegally reentered the United States at an unknown location without inspection, admission, or parole by an Immigration Officer. On March 14, 2026, an ICE law enforcement officer observed **ESCOBAR RODRIGUEZ** driving a 2008 Nissan Titan LE, bearing Maryland registration plate number 3CR4215, at the McDonald's parking lot in Salisbury, Maryland.⁷ After submitting the aforementioned Maryland license plate registration through various law enforcement databases, ICE law enforcement officials discovered the 2008 Nissan Titan LE was registered to **ESCOBAR RODRIGUEZ** at 2306 Pine Way, Salisbury, Maryland 21804, which was the same address **ESCOBAR RODRIGUEZ** had previously provided to ICE Officer Twigg in a sworn statement on March 21, 2023. ICE law enforcement officials later conducted additional records checks of law enforcement databases which revealed that **ESCOBAR RODRIGUEZ** was also the registered owner of a 2011 Ford Econoline Cargo Van, bearing Maryland license plate registration number 4FL1878, at the same address of 2306 Pine Way, Salisbury, Maryland 21804, and **ESCOBAR RODRIGUEZ** possessed a Maryland driver's license (ID #MD10273034995) registered to the same aforementioned residence.

15. Following **ESCOBAR RODRIGUEZ**'s prior deportation, there is no record that **ESCOBAR RODRIGUEZ** 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

16. Pursuant to the facts set forth above, I submit that probable cause exists for the issuance of a criminal complaint and arrest warrant for **ESCOBAR RODRIGUEZ**, an alien who

⁷ This ICE officer knew **ESCOBAR RODRIGUEZ** because he was a target in another ICE officer's investigation.

LNE
TCP USAO #2026R00216

has previously been removed from the United States on seven prior occasions, and who knowingly entered, and was found in, the United States, without having obtained the express consent of the Attorney General of the United States, his successor, or 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 7th day of May 2026.

Chelsea J. Crawford

Honorable Chelsea J. Crawford
United States Magistrate Judge

