

UNITED STATES DISTRICT COURT
for the
District of Massachusetts

United States of America
v.
ALEJANDRINA ELSA QUISPE RAMIREZ

Case No.
16-MJ-2049-MBB

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 July 11, 2016 in the county of Suffolk in the
District of Massachusetts, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Includes entries for 18 U.S.C. Section 473 and 18 U.S.C. Section 545.

This criminal complaint is based on these facts:

See Affidavit of Senior Special Agent Peter Gannon, United States Secret Service, attached hereto.

Continued on the attached sheet.

Complainant's signature (handwritten)

Peter Gannon, Senior Special Agent

Sworn to before me and signed in my presence.

Date: 07/12/2016

City and state: Boston, Massachusetts

Judge's signature (handwritten)
Hon. Marianne B. Bowler, USMJ
Printed name and title

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ **Category No.** II **Investigating Agency** U.S. Secret Service

City Boston

Related Case Information:

County Suffolk

Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Alejandrina Elsa Quispe Ramirez **Juvenile:** Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name _____

Address (City & State) _____

Birth date (Yr only): 1969 **SSN (last4#):** _____ **Sex** F **Race:** _____ **Nationality:** Peru

Defense Counsel if known: _____ **Address** _____

Bar Number _____

U.S. Attorney Information:

AUSA Lori J. Holik **Bar Number if applicable** _____

Interpreter: Yes No **List language and/or dialect:** Spanish

Victims: Yes No **If yes, are there multiple crime victims under 18 USC§3771(d)(2)** Yes No

Matter to be SEALED: Yes No

Warrant Requested **Regular Process** **In Custody**

Location Status:

Arrest Date _____

Already in Federal Custody as of _____ **in** _____

Already in State Custody at _____ **Serving Sentence** **Awaiting Trial**

On Pretrial Release: **Ordered by:** _____ **on** _____

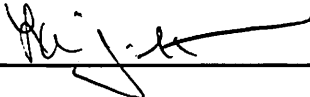
Charging Document: **Complaint** **Information** **Indictment**

Total # of Counts: **Petty** _____ **Misdemeanor** _____ **Felony** 2

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 12 July 2016

Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Alejandrina Elsa Quispe Ramirez

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 473</u>	<u>Dealing in Counterfeit Obligations or Securities</u>	<u>One</u>
Set 2	<u>18 USC 545</u>	<u>Smuggling Goods into the United States</u>	<u>Two</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Peter Gannon, having been duly sworn, depose and state as follows:

Introduction and Agent Background

1. I am a Senior Special Agent with the United States Secret Service (USSS), United States Department of Homeland Security, and have so been employed for approximately twenty one years. I am currently assigned to the Boston Field Office in Boston, Massachusetts. My responsibilities include the investigation of various criminal offenses, including the investigation of the manufacturing and distribution of counterfeit United States Federal Reserve notes and smuggling of such counterfeit into the United States.

2. I am currently participating in an investigation of violations of Title 18, United States Code, Section 473, dealing in counterfeit obligations or securities, and Title 18, United States Code, Section 545, smuggling goods into the United States. Based on the evidence discovered through the course of this investigation, there is probable cause to believe that on July 11, 2016, ALEJANDRINA ELSA QUISPE RAMIREZ (dob 1969) violated these statutes as set forth more fully below.

3. The information contained in this affidavit is based on my personal observations during the course of this investigation, on information conveyed to me by other law enforcement officials participating in this investigation, and on my review of records, documents, and other physical evidence obtained during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation but instead have set forth only the facts necessary to establish the requisite probable cause.

Background of Investigation

4. On or about July 2, 2016, the Peruvian National Police advised USSS that three individuals, ALEJANDRINA ELSA QUISPE RAMIREZ and her two sons, JOSE ARMANDO CARRERA QUISPE and JESUS ANGEL CARRERA QUISPE, would be traveling to the United States on July 11, 2016 carrying a large amount of counterfeit U.S. currency in their luggage, concealed within thread “cones.” The “cones” are actually spindles used for string or yarn for sewing machines or textile manufacturing machines. USSS has made recent seizures of counterfeit currency smuggled into the United States from Peru in similar spindles.

5. On or about July 6, 2016, USSS confirmed that the three family members identified above were scheduled to travel on Cabo Airlines Flight #311, departing Lima Peru on July 11, 2016 with a stop in Panama City, Panama and a final destination of Logan International Airport in Boston, Massachusetts. The flight was scheduled to arrive in Boston at 6:08 p.m.

6. On or about July 6, 2016, U.S. State Department agents provided USSS with the U.S. Visa applications for ALEJANDRINA ELSA QUISPE RAMIREZ, JOSE ARMANDO CARRERA QUISPE, and JESUS ANGEL CARRERA QUISPE. All three claimed that the purpose of the visit was to go to Shriners Hospital located at 15 Blossom Street Boston, Massachusetts. I know Shriners Hospital for Children to be a hospital where juvenile burn victims receive free medical services. JESUS ANGEL CARRERA QUISPE is a seventeen year old juvenile. His visa photo shows that he is severely burned over his entire face.

7. On or about July 7, 2016, I contacted Shriners Hospital. I spoke with JESUS ANGEL CARRERA QUISPE’s case manager who confirmed that he had previously been a patient of

the hospital for various medical procedures over approximately the past eight years. The case manager further advised that he is not scheduled to return to the hospital for treatment until November or December 2016.

July 11, 2016

8. On July 11, 2016, following the arrival of Cabo Airlines Flight #311, U.S. Customs and Border Protection (CBP) inspected three pieces of luggage checked in the names of ALEJANDRINA ELSA QUISPE RAMIREZ and JOSE ARMANDO CARRERA QUISPE when they entered the United States. CBP confirmed the existence of spindles, as described in Paragraph 4 above, inside the three pieces of checked luggage. The spindles were wrapped in clothing. A USSS Agent present for the CBP inspection inserted a GPS monitoring tracker into each of the three pieces of luggage.

9. Law enforcement followed ALEJANDRINA ELSA QUISPE RAMIREZ and her two sons as they took a taxi cab from Logan to Somerville, MA, and observed ALEJANDRINA ELSA QUISPE RAMIREZ and her sons exit the taxi with the three pieces of luggage. They met a fourth individual and walked, with the luggage, approximately two blocks where the four entered a Mazda Sport Utility vehicle with Pennsylvania license plates (the Mazda) driven by another man. Based upon my training and experience, this is a method used to evade detection by law enforcement.

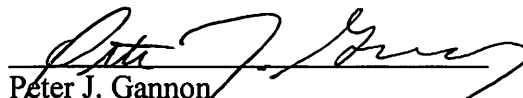
10. Shortly after ALEJANDRINA ELSA QUISPE RAMIREZ and her sons entered the Mazda, law enforcement agents observing the group believed that the surveillance had been compromised. The Mazda made an illegal U turn in the middle of the street. Agents stopped the vehicle and identified the occupants. The luggage was opened and the presence of the spindles described above was verified.

11. Approximately 140 total spindles were removed from the three checked luggage bags, each with approximately \$85,000 in counterfeit \$100 Federal Reserve Notes wrapped inside the spindle. In total, the three bags contained approximately \$1,212,200.00 in counterfeit \$100 Federal Reserve Notes.


CONCLUSION

12. Based on the foregoing, I submit there is probable cause to believe that on or about July 11, 2016, ALEJANDRINA ELSA QUISPE RAMIREZ did knowingly transfer, receive and deliver counterfeit \$100 Federal Reserve Notes with the intent that same be passed, published and used as true and genuine, in violation of Title 18, United States Code, Section 473, and willfully and knowingly imported and brought into the United States certain merchandise, to wit, counterfeit \$100 Federal Reserve Notes, contrary to law in violation of Title 18, United States Code, Section 545.

Sworn to under the pains and penalties of perjury.


Peter J. Gannon
Senior Special Agent, USSS

SUBSCRIBED AND SWORN TO BEFORE ME THIS 12th DAY OF
JULY, 2016.


HONORABLE MARIANNE B. BOWLER
UNITED STATES MAGISTRATE JUDGE

