
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
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FERNANDO RAMIREZ : Mag. No. 12-3565


I, Michael B. Firing, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Criminal Enforcement Officer with the Department of Homeland Security, U.S. Customs and Border Protection, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Michael B. Firing, Criminal Enforcement Officer
Department of Homeland Security
U.S. Customs and Border Protection

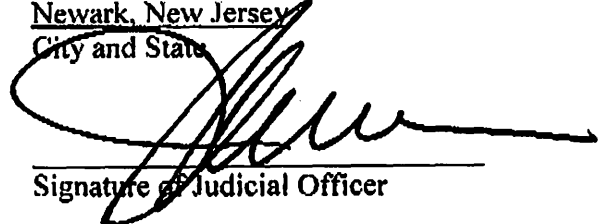
Sworn to before me and subscribed in my presence,

February 17, 2012
Date

at

Newark, New Jersey
City and State

Honorable Mark Falk
United States Magistrate Judge
Name and Title of Judicial Officer



Signature of Judicial Officer

ATTACHMENT A

On or about February 16, 2012, in Essex County, in the District of New Jersey, and elsewhere,
the defendant,

FERNANDO RAMIREZ,

did knowingly and in reckless disregard of the fact that an alien had not received prior official authorization to come to, enter, and reside in the United States, bring to and attempt to bring to the United States such alien, regardless of the official action which may later be taken with respect to such alien, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

ATTACHMENT B

I, Michael Firing, am a Criminal Enforcement Officer with the Department of Homeland Security, U.S. Customs and Border Protection. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about February 16, 2012, Continental Airlines Flight 1022 from the Republic of Panama arrived at Newark Liberty International Airport in Newark, New Jersey. Defendant FERNANDO RAMIREZ ("RAMIREZ") arrived in Newark on Flight 1022. Passengers L.M., N.L., and E.R. also arrived in Newark on Flight 1022.

2. Upon arriving in Newark, Defendant RAMIREZ, L.M., N.L., and E.R. were all referred for a secondary U.S. Customs and Border Protection ("CBP") examination. CBP records showed that RAMIREZ had booked the flights for L.M., N.L., and E.R. from the Republic of Panama to the United States. L.M., N.L., and E.R. are all citizens of the Dominican Republic and all three were traveling with fraudulent Spanish passports.

3. During the secondary examination, RAMIREZ was advised of his Miranda rights. RAMIREZ signed a waiver of rights form and agreed to be interviewed. During the interview, RAMIREZ admitted, in substance and in part, that he obtained and paid for the fraudulent Spanish passports for L.M., N.L., and E.R. in order to illegally bring them into the United States. RAMIREZ further stated, in substance and in part, that he was to be paid for his services in illegally bringing the individuals into the United States.

4. During the secondary examination, L.M. was advised of his Miranda rights. L.M. signed a waiver of rights form and agreed to be interviewed. During the interview, L.M. stated, in substance and in part, that RAMIREZ provided him with a fraudulent Spanish passport for L.M. to use to travel to the United States. L.M. also stated, in substance and in part, that he was going to work in RAMIREZ's supermarket for one year as payment for RAMIREZ illegally bringing him into the United States.

5. During the secondary examination, N.L. was advised of her Miranda rights. N.L. signed a waiver of rights form and agreed to be interviewed. During the interview, N.L. stated, in substance and in part, that RAMIREZ provided her with a fraudulent Spanish passport for N.L. to use to travel to the United States. N.L. also stated, in substance and in part, that she was to pay RAMIREZ between \$12,000 and \$15,000 as payment for RAMIREZ illegally bringing her into the United States.

6. During the secondary examination, E.R. was advised of her Miranda rights. E.R. signed a waiver of rights form and agreed to be interviewed. During the interview, E.R. stated, in substance and in part, that RAMIREZ provided her with a fraudulent Spanish passport for E.R. to use to travel to

the United States. E.R. also stated, in substance and in part, that she was going to work in RAMIREZ's supermarket as payment for RAMIREZ illegally bringing her into the United States.