
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	
	:	
TOMASZ ADAM ZIELINSKI	:	Mag. No. 08-4087 (CCC)

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 5, 2008, on an aircraft, with its next scheduled destination being Newark Liberty International Airport in the District of New Jersey, in the special aircraft jurisdiction of the United States, as that term is defined in Title 49, United States Code, Section 46501(2)(D)(i), defendant TOMASZ ADAM ZIELINSKI did:

knowingly and willfully commit a simple assault upon an individual who had attained the age of 16 years, contrary to Title 18, United States Code, Section 113(a)(5),

in violation of Title 49, United States Code, Section 46506(1).

I further state that I am a Special Agent for the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Yelena Reinstein, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
July 11, 2008 at Newark, New Jersey

HONORABLE CLAIRE C. CECCHI
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

I, Yelena Reinstein, a Special Agent of the Federal Bureau of Investigation, having conducted an investigation and having spoken with other individuals, have knowledge of the following facts:

1. On or about July 5, 2008, LOT Polish Airlines Flight 15 (hereinafter "Flight 15") departed from Warsaw, Poland, with its next scheduled destination being Newark Liberty International Airport in the District of New Jersey. Among the passengers traveling aboard Flight 15 was defendant TOMASZ ADAM ZIELINSKI, a citizen of Poland.
2. During the flight, defendant ZIELINSKI was seated next to a sixteen-year-old female passenger (hereinafter "Passenger 1").
3. Prior to the flight's arrival at Newark Liberty International Airport, defendant ZIELINSKI reached under a blanket that was covering Passenger 1's lap and torso, and he began touching her right thigh with his hand. Defendant ZIELINSKI proceeded to move his hand up along Passenger 1's lower abdomen toward her chest. Passenger 1 blocked defendant ZIELINSKI's hand from proceeding higher with her arm and then pushed the blanket downward. In response, defendant ZIELINSKI moved his hand down to Passenger 1's thigh and into the area of her crotch before attempting to unzip her pants. Passenger 1 responded by leaving her seat and seeking the assistance of members of the in-flight crew, who ultimately permitted her to change her seat for the duration of the flight.
4. Later in the flight, defendant ZIELINSKI approached Passenger 1 and stated, in substance and in part, that he was sorry, that he wanted her forgiveness, and that his name was "Tomas" (phonetic). The flight crew directed defendant ZIELINSKI to go back to his seat away from Passenger 1.
5. Flight 15 landed at Newark Liberty International Airport in the District of New Jersey at approximately 9:00 p.m. (EST) on July 5, 2008.
6. On or about July 9, 2008, FBI agents conducted a voluntary interview with defendant ZIELINSKI. During the interview, defendant ZIELINSKI stated, in substance and in part, that he had been a passenger on Flight 15 and that during that flight he intentionally used his hands to touch the body of a young woman seated next to him, in particular, on her inner thigh and lower abdomen, without her consent to do so.