UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Honorable Joseph A. Dickson

v.

Mag. No. 14-6726 (JAD)

EUN JONG LEE

CRIMINAL COMPLAINT

I, Mary Anne Flippo, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about August 10, 2014, in the District of New Jersey and elsewhere, defendant EUN JONG LEE:

in the special aircraft jurisdiction of the United States, did knowingly and intentionally engage in sexual contact with an adult female (the "Victim"), to wit, the intentional touching, directly and through the clothing, of the breast, without the Victim's permission, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of another person,

in violation of Title 18, United States Code, Section 2244(b) and Title 49, United States Code, Section 46506.

I further state that I am a Special Agent with 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.

Mary Anne Rippo, Special Agent Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, August 11, 2014 at Newark, New Jersey

THE HONORABLE JOSEPH A. DICKSON UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

- I, Mary Anne Flippo, a Special Agent with the Federal Bureau of Investigation ("FBI"), having conducted an investigation and having spoken with other individuals, have knowledge of the following facts. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause. All statements included herein are in substance and in part:
- 1. On or about August 10, 2014, defendant EUN JONG LEE was a male passenger aboard United Flight 78 (the "Flight"), departing from Narita International Airport in Tokyo, Japan at approximately 5:30 p.m. Japan Standard Time and arriving at Newark Liberty International Airport approximately twelve hours later, at approximately 5:30 p.m. Eastern Daylight Time.
- 2. During the Flight, defendant EUN JONG LEE was seated next to a female passenger (the "Victim"). The Victim, who was traveling alone, did not know defendant EUN JONG LEE.
- 3. At some point during the Flight, the Victim fell asleep. Sometime thereafter, and while the aircraft was still in flight, the Victim awoke to find one of defendant EUN JONG LEE's hands located on top of her shirt and touching her breast through her clothing. Defendant EUN JONG LEE then touched the skin of the Victim's neck with his hand and attempted to place his hand down the front of the Victim's shirt.
- 4. The Victim subsequently asked defendant EUN JONG LEE, in sum and substance, to stop touching her. Defendant EUN JONG LEE then quickly got up from his seat and walked toward the restroom at the far end of the aircraft.
- 5. The Victim reported the incident to a flight crew member and provided a written statement to the flight crew member that described what had occurred.
- 6. Upon landing, and after initial questioning by Customs and Border Protection officials, defendant EUN JONG LEE consented, after receiving Miranda warnings, to an interview by the FBI. During the FBI interview, defendant EUN JONG LEE admitted to, among other things, touching the Victim in her breast region with his hand.