

AO 91 (Rev. 5/85) Criminal Complaint

United States District Court

State and

DISTRICT OF

New Mexico

UNITED STATES OF AMERICA

V.

KEITH ANTHONY WRIGHT

Year of Birth: 1959

SSAN: XXX-XX-5160

FILED
At Albuquerque NM

JUL - 1 2009

MATTHEW J. DYKMAN
CLERK

CRIMINAL COMPLAINT

CASE NUMBER:

09-MJ-1853

(Name and Address of Defendant)

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 June 30, 2009 in Bernalillo county, in the state and _____ District of New Mexico defendant(s) did,

on an aircraft in the special aircraft jurisdiction of the United States, did assault or intimidate Renee L. Tate, a flight crew member or flight attendant of the aircraft, and did interfere with the performance of her duties as a flight attendant

in violation of Title 49 United States Code, Section(s) 46504

I further state that I am a Special Agent, FBI and that this complaint is based on the following
Official Title

facts: See attached Affidavit.

Continued on the attached sheet and made a part hereof:

YES

No



Signature of Complainant

ANTHONY J. COSTANZA
Special Agent,
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

July 1, 2009

Date

at

Albuquerque, New Mexico

City and State

U.S. Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA)
)
VS.)
)
KEITH ANTHONY WRIGHT)
Year of birth: 1959)
SSAN: XXX-XX-5160)

AFFIDAVIT

I, the undersigned, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been employed in that capacity for approximately one year. I am currently assigned to the Albuquerque Division and have primary investigative responsibilities in violent and other major crimes and federal violations. The information set forth in this affidavit has been derived from my own investigation or communicated to me by other sworn law enforcement officers or from other reliable sources.

2. On June 30, 2009, the Federal Bureau of Investigation initiated an investigation into the redirecting of U.S. Airways Flight 704, en route from Salt Lake City to Los Angeles International, to Albuquerque Sunport. The flight was diverted primarily due to a medical emergency onboard. However, a secondary reason for its redirection, was the erratic and dangerous behavior of a passenger onboard, who had been restrained by aircraft personnel and passengers.

3. While in Charlotte Douglas International Airport, Flight Service Supervisor Claudia Kearney observed Keith Anthony Wright dancing in the boarding area. She

1 considered this strange behavior because the area was crowded with people. She followed
2 Wright to the airport bar, where she stopped him to speak to him. Wright told her that he
3 had drunk one beer. However, she did not smell any alcohol on him, and, based on her
4 conversation with him, she determined that he was not drunk and that he was well enough
5 to travel. Kearney told Wright that he should not have any more alcohol, and she further
6 followed him onto the plane when he boarded and advised the head flight attendant that
7 Wright should not be served alcohol in flight.

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9 3. Onboard U.S. Airways Flight 704, en route from Salt Lake City to Los
10 Angeles International, Keith Wright, seated in 26E, completely removed his clothing and
11 tossed the clothing into the row in front of him. He further refused to secure his seatbelt
12 and was unresponsive to repeated attempts by Senior Flight Attendant Renee L. Tate to
13 communicate with him. Tate instructed Wright to dress himself and he did not respond.
14 She further attempted to cover Wright with a blanket, however, Wright threw the blanket
15 off. Tate then requested the assistance of some aircraft passengers to help her restrain
16 Wright, including Los Angeles Police Officer Brent Hirunpugdi and Deputy Stephanie
17 Sparks, of the Los Angeles Sheriff's Department. Wright punched and kicked Tate and
18 the passengers assisting her while they handcuffed him and secured him to his seat. One of
19 the passengers assisting Tate received severe bruising to his arm during this struggle. After
20 the plane landed in Albuquerque, Wright was taken into custody by Albuquerque Aviation
21 Police.

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23 4. In a subsequent interview with SAs of the FBI, Wright advised that he was
24 bipolar and that he had not taken his prescribed medication, Divalproex, that morning
25 before leaving New York. He stated that he recalled nothing of the flight nor of his reported
26 behavior.

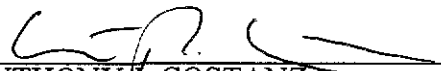
1 5. Based on the information set forth in this affidavit, your affiant submits that
2 there is probable cause to believe that on June 30, 2009, Keith Anthony Wright, date of
3 birth 1959, did, on an aircraft in the special aircraft jurisdiction of the United States, assault
4 or intimidate Renee L. Tate, a flight crew member or flight attendant of the aircraft, and did
5 interfere with the performance of her duties as a flight attendant in violation of Title 49,
6 United States code, Section 46504.

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8 I swear that this information is true and correct to the best of my knowledge.

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ANTHONY J. COSTANZA
Special Agent
Federal Bureau of Investigation
Albuquerque, New Mexico

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Subscribed and sworn to
before me, this 1st day of July, 2009.

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U.S. Magistrate Judge

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