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

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UNITED STATES OF AMERICA : Honorable Cathy L. Waldor  
: :  
v. : Mag. No. 14-7271  
: :  
KARAN SEECHURN : **CRIMINAL COMPLAINT**

I, Michael Alerassool, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about December 23, 2014, in the District of New Jersey and elsewhere, defendant KARAN SEECHURN:

in the special maritime jurisdiction of the United States, while on board and during a cruise which originated in Bayonne, New Jersey and disembarked in Bayonne, New Jersey, did knowingly engage in sexual contact with an adult female (the "Victim"), to wit, the intentional touching, directly and through the clothing, of the genitalia, without the Victim's permission, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of another person, when the Victim was incapable of appraising the nature of the conduct and was physically incapable of declining participation in, or communicating unwillingness to engage in, said sexual act.

In violation of Title 18, United States Code, Section 2244(a)(2).

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

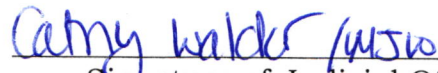
continued on the attached page and made a part hereof.

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Michael Alerassool, Special Agent  
Federal Bureau of Investigation  
(Agent Alerassool attested to this Affidavit  
by telephone pursuant to FRCP 4.1(b)(2)(A))

Sworn to before me and subscribed in my presence,  
December 28, 2014 in the District of New Jersey

THE HONORABLE CATHY L. WALDOR  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

## ATTACHMENT A

I, Michael Alerassool, am a Special Agent with the Federal Bureau of Investigation. 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 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 December 23, 2014, defendant KARAN SEECHURN was a male employee, on board a cruise ship, which embarked from Bayonne, New Jersey, traveled to the Bahamas, and disembarked in Bayonne, New Jersey on December 27, 2014.

2. Defendant KARAN SEECHURN was employed by the cruise line and was responsible for re-stocking the minibars located in passengers' rooms. In order to conduct this duty, he was provided with a key that provided access to passengers' rooms. On or about December 23, 2014, KARAN SEECHURN used this key to access passengers' rooms when he was not authorized or permitted to do so.

3. On or about December 23, 2014, a female passenger (the "Victim") was sleeping in her room aboard the cruise ship. While the Victim was asleep, defendant KARAN SEECHURN entered the Victim's room without her knowledge and permission. The Victim awoke to find one of defendant KARAN SEECHURN's hands touching her genitalia, she pushed him off her and she tried to leave the room, but he pulled her back and threatened to burn down the cruise ship if she told anyone.