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***United States District Court***  
***District of New Jersey***

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UNITED STATES OF AMERICA : Hon. Steven C. Mannion  
v. : Magistrate No. 16-6003  
STIVEN LOPEZ-BENDER : CRIMINAL COMPLAINT

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 November 11, 2015, in the District of New Jersey, and elsewhere, defendant STIVEN LOPEZ-BENDER did:

SEE ATTACHMENT A

I further state that I am a Joint Terrorism Task Force Officer of the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

  
Robert Medaglia  
Joint Terrorism Task Force Officer  
Federal Bureau of Investigation

Sworn to and subscribed in my presence,

1-6-16  
Date

At Newark, New Jersey  
City and State

Hon. Steven C. Mannion  
United States Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer

ATTACHMENT A

(Aiming a Laser Pointer at an Aircraft)

On or about November 11, 2015, in Union County, in the District of New Jersey and elsewhere, defendant

STIVEN LOPEZ-BENDER

did knowingly aim the beam of a laser pointer at an aircraft in the special aircraft jurisdiction of the United States as defined by Title 49, United States Code, Section 46501, in violation of Title 18, United States Code, Section 39A.

## ATTACHMENT B

I, Robert Medaglia, a Joint Terrorism Task Force Officer of the Federal Bureau of Investigation, am fully familiar with the facts set forth herein based on my investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning the investigation. All statements which I have attributed to others have been set forth in substance and in part.

1. At all times relevant to this Complaint:

- a. Individual 1 was a helicopter operator who worked on behalf of WABC-TV, Channel 7, New York, an affiliate of ABC, Inc. ("WABC").
- b. Individual 2 reported stories on behalf of WABC from the helicopter as a reporter/videographer. Individual 2 would advise Individual 1 about a location for a story, and Individual 1 would guide the helicopter to the appropriate location. Aviation news footage would then be developed for either "Live on Air Breaking News" or for footage for a later story.

2. On or about November 11, 2015, Individual 2 requested Individual 1 to fly the helicopter to a location in Elizabeth, New Jersey to cover a house fire story. At approximately 5:20 pm, while at an altitude of approximately 1000 feet facing south, a green laser strike was aimed at and struck the flight deck of the helicopter through the main windshield.

3. Individual 1 and Individual 2 subsequently observed defendant STIVEN LOPEZ-BENDER ("LOPEZ-BENDER") emerge from a sports utility vehicle ("SUV"), reach into the passenger side of the SUV, and then point a green-color laser at the helicopter, causing a second laser strike to the helicopter.

4. Individual 1 lowered the helicopter to approximately 500 feet in altitude. As defendant LOPEZ-BENDER walked towards an apartment building, defendant LOPEZ-BENDER turned and again pointed the green-color laser towards the helicopter before entering the apartment building, causing a third strike to the helicopter.

5. Individual 1 then circled the area at an altitude of approximately 800 feet. Within approximately 10 minutes, the helicopter was again lasered from a window in the apartment building into which defendant LOPEZ-BENDER had just entered.

6. Defendant LOPEZ-BENDER was interviewed by law enforcement on November 11, 2015. During the recorded interview, defendant LOPEZ-BENDER admitted that he pointed a green-color laser at the WABC helicopter several times that day between approximately 5:15 pm and 5:45 pm.

7. The helicopter was in the special aircraft jurisdiction of the United States.