
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Joseph A. Dickson
: :
v. : Mag. No. 16-6582
: :
YOEL OBERLANDER : CRIMINAL COMPLAINT

I, Joshua Stenzel, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 29, 2016, in the District of New Jersey and elsewhere, the defendant, Yoel Oberlander,

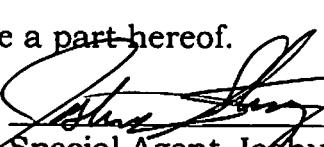
in the special aircraft jurisdiction of the United States, while on board and during a flight which originated in Tel Aviv, Israel, and landed at Newark Liberty International Airport, did knowingly engage in sexual contact, as defined in 18 U.S.C. 2246(3), with an adult female (the "Victim"), to wit, the intentional touching, directly and through the clothing, of the Victim's inner thigh and 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 pages and made a part hereof.


Special Agent Joshua Stenzel
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
June 16, 2016 at Newark, New Jersey

THE HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

I, Joshua Stenzel, a Special Agent with the Federal Bureau of Investigation, 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 May 29, 2016, Defendant YOEL OBERLANDER was a male passenger aboard El Al Airlines flight LY27 (the "Flight"), departing from Tel Aviv, Israel, at approximately 12:30 a.m., and arriving at Newark Liberty International Airport at approximately 5:45 a.m.

2. During the flight, Defendant OBERLANDER was seated in window seat next to a female passenger (the "Victim") who was seated in a middle seat. Defendant OBERLANDER was unknown to the Victim, who was flying with her mother, seated next to the Victim in an aisle seat.

3. Several hours into the Flight, after dinner was served and the cabin lights were dimmed, Defendant OBERLANDER placed his hand on the Victim's left thigh. The Victim changed positions, after which Defendant OBERLANDER removed his hand from the Victim's thigh. Shortly thereafter, Defendant OBERLANDER again placed his hand on the Victim's thigh. Again, the Victim shifted her position in her seat, causing defendant OBERLANDER to remove his hand.

4. Thereafter, while the aircraft was still in flight to the United States, the Victim, whose eyes were closed and was attempting to sleep, felt OBERLANDER's hand on her left breast, over her shirt. Not wanting to alert Defendant OBERLANDER that she was awake, Victim 1 shifted her position in her seat closer to her mother, after which Defendant OBERLANDER removed his hand from her breast.

5. Thereafter, Defendant OBERLANDER began rubbing the Victim's hand, at which point Victim put her hands in her sweatshirt pockets. Defendant OBERLANDER then moved his hand and again placed it on the Victim's left breast, over her clothing. At this point, the Victim turned completely away from Defendant OBERLANDER and crossed her arms and covered herself with a blanket. When the Victim's mother awoke, the Victim asked her mother to switch seats with her.

6. Before the Flight landed in Newark, Victim 1 reported to the flight crew what had occurred.