

ATTACHMENT A

(Interference with Flight Crew Members and Attendants)

On or about February 9, 2025, in the District of New Jersey and elsewhere, the defendant,

LUIS VAQUERO,

while on an aircraft in the special jurisdiction of the United States traveling to Newark Liberty International Airport from Miami, Florida, did assault or intimidate flight attendants and crew members of that aircraft, thereby interfering with the performance of the duties of the flight attendants and crew members and lessening the ability of the flight attendants and crew members to perform those duties.

In violation of Title 49, United States Code, Section 46504.

ATTACHMENT B

I, Kyle Peabody, 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 other items of evidence. 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 statements of others are related herein, they are related in substance and part. 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 February 9, 2025, defendant Luis Vaquero (“Vaquero”) was a passenger aboard a commercial airlines flight (the “Flight”) departing from Miami, Florida and arriving at Newark Liberty International Airport in Newark, New Jersey.

2. During the Flight, Vaquero engaged in verbal altercations with other passengers and the flight crew, including making threats of physical violence against a disabled minor and mocking a group of Jewish passengers. One of the flight attendants (“Attendant-1”), who had observed Vaquero’s hostile and intimidating behavior, declined to serve Vaquero alcohol after the beverage service window closed. In response, Vaquero threatened Attendant-1, telling her, “You better watch out, shit’s gonna happen to you.” This caused Attendant-1 to remain in the rear portion of the cabin for the remainder of the flight, interfering with her ability to perform her duties, and requiring other flight attendants to adjust their responsibilities.

3. Vaquero’s verbal altercations and noncompliance continued throughout the remainder of the flight, causing the flight crew to request a law enforcement response at the gate upon arrival.

4. Upon arrival at Newark Liberty International Airport, the captain made an announcement over the aircraft’s public address (PA) system requesting passengers remain seated upon arrival at the gate as law enforcement would be removing a passenger first.

5. Shortly after this PA announcement, Vaquero disregarded crew member instructions, left his seat, approached the flight deck door and began banging on the door with his fists and yelling and cursing at the captain while the plane was taxiing to the gate. Upon arrival at the gate, the captain emerged from the flight deck, after which Vaquero approached the captain, screaming and threatening him until law enforcement boarded the plane and escorted Vaquero off the plane. While issuing these threats, Vaquero’s face was approximately six inches from the captain’s face.

6. Law enforcement lawfully obtained several videos of the incident. In one video, Vaquero bangs on the flight deck door, demanding the pilot's name and yelling, "I don't give a fuck!" Later in the video, Vaquero yells towards the flight deck, "I need the pilot to come outside!" He then tells a flight attendant, "I will really break your fuckin' jaw n***a!"

7. In another video, Vaquero yells, "I know they outside that door!" referring to law enforcement waiting to board the plane. Vaquero then yells, "I wanna see that fuckin' captain! Come outside you bitch ass n***a!" When the captain subsequently opens the flight deck door, Vaquero yells, "I got you on camera bitch!"