
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Mag. No. 25-8011
	:	
v.	:	Honorable Jessica S. Allen, U.S.M.J.
	:	
JAMES M. PEDONE	:	CRIMINAL COMPLAINT
	:	
	:	

I, Charles Blessing II, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Charles Blessing II

Charles Blessing II
Joint Terrorism Task Force Officer
Federal Bureau of Investigation

Joint Terrorism Task Force Officer Charles Blessing II attested to this Affidavit by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on February 4, 2025, in the District of New Jersey.

/s/ Jessica S. Allen

Honorable Jessica S. Allen
United States Magistrate Judge

ATTACHMENT A

(Aiming a Laser Pointer at an Aircraft)

On or about December 12, 2024, in Monmouth County, in the District of New Jersey and elsewhere, the defendant,

JAMES M. PEDONE,

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, Charles Blessing II, am a Joint Terrorism Task Force Officer with the Federal Bureau of Investigation. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including video surveillance. 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 the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. 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 12, 2024, two federal law enforcement agents (“Agent-1” and “Agent-2,” collectively “the Agents”) were operating an aircraft (“the Aircraft”) within the vicinity of in or near Colts Neck, New Jersey and within the special aircraft jurisdiction of the United States. At approximately 8:00 p.m. that day, while the Aircraft was flying over a group of residential homes at approximately 2,500 feet in altitude, the Agents observed from the cockpit of the Aircraft a green laser beam strike the bottom of the Aircraft. The Agents then began to turn the Aircraft around in an attempt to identify the origin of the green laser beam that had struck the bottom of the Aircraft.

2. Shortly thereafter, the Agents observed a second green laser beam again strike the bottom of the Aircraft. The Agents then visually identified a residential home in Colts Neck, New Jersey (the “Residence”) as being the source of the two green laser beam strikes on the bottom of the Aircraft.

3. Agent-1 then began utilizing camera equipment¹ onboard the Aircraft (“the Aircraft Camera”) to visually record the Residence. Shortly thereafter, the Aircraft was again struck by a green laser beam at the bottom of the Aircraft which the Agents observed to be emanating from the vicinity of the Residence, and which was visually captured and recorded by the Aircraft Camera. Further, Agent-2, while using the Aircraft Camera, observed an individual wearing dark-colored clothing standing in the vicinity of the Residence pointing a green laser at the Aircraft, with a second individual who was wearing light-colored clothing standing nearby. The Agents, utilizing data obtained from the Aircraft Camera, then notified air traffic controllers of the three green laser

¹ The Aircraft Camera utilizes a computer system that operates in conjunction with the Aircraft’s onboard global positioning system (“GPS”) and allows the user of the Aircraft Camera to identify the specific coordinates and address of a location identified below the Aircraft.

beam strikes on the Aircraft and informed air traffic controller personnel that the three green laser beam strikes originated from the vicinity of the Residence.

4. At approximately 8:30 pm that same day, two members of local law enforcement (the “Police”) arrived at the Residence. Upon arriving at the Residence, the Police observed, through a large unobstructed window adjacent to the front door of the Residence, an adult male, later identified as James M. Pedone (“PEDONE”) who was wearing dark-colored clothing, along with an adult female (“Individual-1”) who was wearing light-colored clothing. When PEDONE responded to the doorbell and opened the Residence’s front door, the Police identified themselves and notified PEDONE of a recent report of laser beams striking an aircraft that evening that originated from the vicinity of the Residence. PEDONE denied to the Police that either PEDONE or Individual-1 had pointed a laser at an aircraft that evening.

5. On or about December 19, 2024, federal law enforcement agents conducted a voluntary interview of PEDONE at a commercial establishment in or near Edison, New Jersey. During the interview, PEDONE relayed to agents the following information in substance and in part:

- a. In the evening hours of on or about December 12, 2024, PEDONE, who was on a deck area attached to the Residence, observed an aircraft that he thought was a drone² circling the vicinity of the Residence;
- b. PEDONE then pointed a green laser at the Aircraft “once or twice” on or about December 12, 2024, from the vicinity of the Residence; and
- c. After speaking to the Police on or about December 12, 2024, PEDONE disposed of the green laser pointer that he utilized to strike the Aircraft.

² A drone is an “aircraft” as defined by Title 49, United States Code, Section 46501.