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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. James B. Clark III  
 :  
 v. : Mag. No. 19-30035  
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 CORNELIUS TILTON : **CRIMINAL COMPLAINT**

I, Yanelisa Reyes, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about November 30, 2019, in the District of New Jersey and elsewhere, the defendant, Cornelius Tilton,

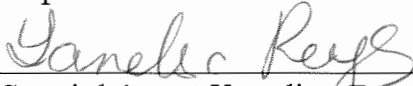
in the special aircraft jurisdiction of the United States, while on board and during a flight which originated in Tel Aviv, Israel, and landed at Newark Liberty International Airport, did knowingly engage in sexual contact, as defined in 18 U.S.C. 2246(3), with an adult male (the "Victim"), without the 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 Yanelisa Reyes  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
December 2, 2019 at Newark, New Jersey

THE HONORABLE JAMES B. CLARK III

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

**ATTACHMENT A**

I, Yanelisa Reyes, 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 November 30, 2019, the defendant Cornelius Tilton (the "defendant") was a male passenger aboard an overnight flight departing from Tel Aviv, Israel, and arriving at Newark, New Jersey, in the early morning.

2. During the flight, the defendant sat in a window seat next to a nineteen-year-old male passenger (the "Victim"). The Victim, a student at a theological seminary, was traveling with a group of students on a religious trip to Israel (the "Trip"). The defendant, a long-time pastor and the president of a religious college in Louisiana, accompanied the group on the Trip, serving as an unofficial guide and giving speeches.

3. In the course of the flight, the defendant placed his hand on the Victim's bare calf. The Victim was awake, and wearing shorts. The defendant continued to touch the Victim's thigh, and eventually began rubbing the Victim's genitals over the Victim's shorts. The Victim did not react, or look at the defendant, out of shock and fear. The defendant took the Victim's hand and placed it on the defendant's erect penis, on top of his clothing. The Victim got up to go to the bathroom, in hopes of ending the assault. The defendant also went to the bathroom. When the Victim and the defendant were back in their seats, the defendant continued to touch the bare skin of the Victim's lower back, underneath the Victim's clothing. The defendant moved his hand around to the front of the Victim's waistline, and attempted to place his hand down the Victim's pants, when the Victim blocked the defendant's hand with the Victim's elbow.

4. The Victim then got up from the seat and informed a flight attendant about the assault.