

UNITED STATES OF AMERICA	:	Honorable Mark Falk
	:	
v.	:	Mag. No. 16-3661
	:	
GANESH PARKAR	:	CRIMINAL COMPLAINT


Signature of Judicial Officer

ATTACHMENT A

On or about December 21, 2016, in the District of New Jersey and elsewhere, defendant,

GANESH PARKAR,

in the special aircraft jurisdiction of the United States, did knowingly and intentionally engage in sexual contact, within the meaning of Title 18, United States Code, Section 2246(3), with another person without such other person's permission.

In violation of Title 18, United States Code, Section 2244(b), and Section 2, and Title 49, United States Code, Section 46506.

ATTACHMENT B

I, Sean Lynch, a Special Agent with the Federal Bureau of Investigation ("FBI"), having conducted an investigation and having spoken with other individuals, have knowledge of the following facts. All statements included herein are related in substance and in 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. All times set forth herein are approximate. 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.

1. On or about December 21, 2016, defendant Ganesh Parkar ("Parkar") was a male passenger aboard Air India Flight AI191 (the "Flight"), which had departed from Chhatrapathi Shivaji International Airport in Mumbai, India at approximately 1:30 a.m. Indian Standard Time. After traveling overnight, the Flight was scheduled to arrive at Newark Liberty International Airport on December 21, 2016 at approximately 7:15 a.m. Eastern Daylight Time.

2. Defendant Parkar's ticketed seat was in the Business Class section. However, prior to take-off, defendant Parkar went to the Economy Class section of the Flight and sat in an available seat in the center row near a female passenger ("Victim"). The remaining seats in the center row next to the Victim were empty. Soon after take-off, defendant Parkar moved to the seat immediately adjacent to the Victim.

3. The Victim did not know the defendant, and engaged in only limited conversation with the defendant during the Flight.

4. At some point during the Flight, the Victim fell asleep. Some period of time later, and while the aircraft was still in flight flying towards the United States, the Victim awoke to find that a blanket that she placed over her body had been removed. The Victim repositioned her blanket to cover her body and fell back asleep.

5. A short while later, the Victim woke up again, this time to find the blanket once again pulled down, and defendant Parkar's right hand inside of her shirt and on her left breast.

6. Upon noticing defendant Parkar's hand touching her breast, the Victim shouted, in sum and substance, "what the hell are you doing?" The Victim then got up out of her seat and informed the Flight crew of the incident. Defendant Parkar got up and followed the Victim. The Flight crew instructed

defendant Parkar to move back to the Business Class section seat to which he had originally been assigned.

7. After defendant Parkar returned to his assigned seat, defendant Parker made repeated requests to the Flight crew to be permitted to speak with the Victim, which requests were refused. Additionally, during the remainder of the Flight, defendant Parkar wrote two short notes to the Victim in which he, in sum and substance, apologized for a "moment's stupidity" and stated, "I acknowledged I was stupid."