

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Michael A. Hammer
v. : Mag. No. 17-4097
VIJAKUMAR KRISHNAPPA : **CRIMINAL COMPLAINT**

I, Sean Lynch, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 23, 2017, in the District of New Jersey and elsewhere, the defendant, Vijakumar Krishnappa,

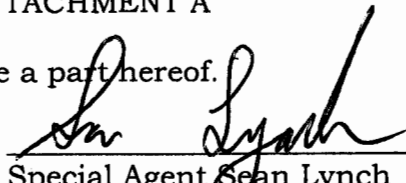
in the special aircraft jurisdiction of the United States, while on board and during a flight which originated in Seattle, Washington, and landed at Newark Liberty International Airport, did knowingly engage in sexual contact, as defined in 18 U.S.C. 2246(3), with a minor female (the "Victim"), to wit, the intentional touching, through the clothing, of the Victim's inner thigh and groin, 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:

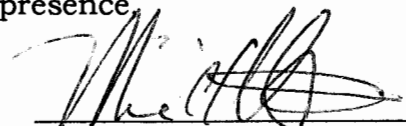
SEE ATTACHMENT A

continued on the attached pages and made a part hereof.


Special Agent Sean Lynch
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
July 24, 2017, at Newark, New Jersey

THE HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

I, Sean Lynch, 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 July 23, 2017, Defendant VIJAKUMAR KRISHNAPPA was a male passenger aboard United Airlines flight UA1695 (the "Flight"), departing from Seattle, Washington, and arriving at Newark Liberty International Airport at approximately 7:00 a.m.

2. During the flight, Defendant KRISHNAPPA was seated next to a minor female passenger (the "Victim"). Defendant KRISHNAPPA was unknown to the Victim, who was traveling alone.

3. Some time into the flight, the victim fell asleep. Defendant KRISHNAPPA placed his hand on the Victim's thigh, after which the Victim woke and Defendant KRISHNAPPA removed his hand.

4. The Victim subsequently fell asleep again. While she was sleeping, Defendant KRISHNAPPA put his hand on her groin and inner thigh, and began rubbing the Victim through her clothing. Defendant KRISHNAPPA also tried to put his other hand inside of the Victim's pants. The Victim was startled awake, and Defendant KRISHNAPPA pulled his hands away.

5. The Victim immediately reported Defendant KRISHNAPPA to a flight attendant and asked to be moved to another seat because Defendant KRISHNAPPA had touched her. The Victim was moved to another seat.