

AO 91 (Rev. 5/85) Criminal Complaint

United States District Court

DISTRICT OF _____

UNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

RICHARD C. REID

CASE NUMBER: _____

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 22, 2001 in Suffolk county, in the _____ District of Massachusetts defendant(s) did, (Track Statutory Language of Offense)

in the special jurisdiction of the United States, by assaulting and intimidating flight crew members or flight attendants of an aircraft, interfere with the performance of the duties of the members and attendants and lessen the ability of the members and attendants to perform those duties.

in violation of Title 49 United States Code, Section(s) 46504
Special Agent,

I further state that I am a(n) Federal Bureau of Investigation Official Title and that this complaint is based on the following facts:

See attached Affidavit of Margaret G. Cronin

Continued on the attached sheet and made a part hereof: Yes No

Sworn to before me and subscribed in my presence,

Signature of Complainant
MARGARET G. CRONIN
Special Agent, Federal Bureau of Investigat.

December 23, 2001
Date

at _____
City and State

JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT OF MARGARET G. CRONIN

I, Margaret G. Cronin, being duly sworn, do depose and state that:

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed for 14 years. I am currently assigned to the Bank Robbery Task Force of the Boston Field Division of the FBI.

2. I am aware that Title 49, United States Code, Section 46504, makes it a crime for anyone on an aircraft in the special jurisdiction of the United States, to assault or intimidate a flight crew member or flight attendant of the aircraft, thereby interfering with the performance or duties of the member or attendant or lessening his or her ability to perform those duties. I am further aware that the special aircraft jurisdiction of the United States, as defined by Title 49 United States Code, Section 46501(2), applies to an aircraft outside the United States that has its next scheduled destination in the United States, if the aircraft next lands in the United States. It applies as well to an aircraft against which an individual commits an offense, if the aircraft lands in the United States with the individual still on the aircraft.

3. I submit this affidavit in support of a criminal complaint against RICHARD C. REID ("REID"), DOB 8/12/73, charging him with interference with flight attendants. The facts set

forth herein are based both on my own personal knowledge and on information related to me by other FBI Special Agents and other law enforcement personnel.

4. On December 22, 2001, American Airlines flight number AA63, with 183 passengers on board and a crew of about 14, departed Charles DeGaulle Airport in Paris, France, bound for Miami, Florida. While the aircraft was en route, the FBI was notified of an apparent disturbance involving an assault by a passenger, identified as RICHARD REID, upon a flight attendant. The FBI was further notified that as a consequence of the disturbance, the aircraft was being diverted from Miami, Florida to Boston, Massachusetts and would be landing at 12:53 P.M. E.S.T.

5. American Airlines flight number AA63 landed in Boston at 12:50 P.M.. I, fellow FBI Special Agent Charles Gianturco, and Massachusetts State Police troopers boarded the aircraft and were met by the captain. He related that during the flight, a flight attendant smelled what she thought was a match. After she determined that it was REID, the flight attendant confronted him, a struggle ensued, and a second flight attendant who came to her assistance was bitten on the thumb by REID. The captain related that REID was then subdued in some fashion.

6. The captain provided me with REID's passport, which the captain had confiscated after the altercation. It is a British

passport that indicates that it was issued on December 7, 2001 by the British embassy in Brussels, Belgium.

7. Following my conversation with the captain, FBI Special Agent Charles Gianturco and I took REID into custody. FBI Special Agents and Massachusetts State Police troopers then commenced interviews of the flight crew and passengers.

8. Among those interviewed was flight attendant Hermis Moutardier. She confirmed the captain's account of the assaultive and disruptive conduct by REID, while providing additional details. She related the following:

a. About one and a half hours into the flight, she smelled what she thought was a burnt match. While walking the cabin aisle trying to determine which passenger may have lit a match, a passenger pointed to REID. When she confronted him, he put a match into his mouth. She then went to alert the captain over the intercom system.

b. Upon returning to REID, he lit a match, and it appeared to Ms. Moutardier that he was attempting to set fire to the inner tongue of his sneaker. She then noticed a wire protruding from that sneaker. She grabbed at the sneaker and REID shoved her into the bulkhead. She made a second attempt to grab the shoe, and he pushed her to the floor. Ms. Moutardier then yelled for help and ran to get water.

c. At that point, a second flight attendant, Cristina

Jones, joined the struggle with REID. He bit Ms. Jones on the thumb and Ms. Moutardier threw water in his face.

d. Several passengers, hearing the commotion and the flight attendants' calls for help, came to their aid and managed to subdue REID. For the duration of the flight, they restrained him.

7. When I took REID into custody I observed that he is approximately six feet four inches tall and appears to weigh in excess of 200 pounds.

8. Based on the foregoing, I believe that probable cause exists to conclude that on December 22, 2001, RICHARD C. REID, in the special aircraft jurisdiction of the United States, by assaulting and intimidating flight attendants of an aircraft, did interfere with the performance of the duties of the attendants and lessen their ability to perform their duties.

MARGARET G. CRONIN
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me this twenty-third day of
December, 2001.

JUDITH G. DEIN
United States Magistrate Judge