

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

FILED 16 JUN '16 12:11 USDC-DRP

District of Oregon

United States of America)

v.)

Chad Cameron Camp)

Case No.)

'16-MJ-79)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 15, 2016 in the county of Multnomah in the District of Oregon, the defendant(s) violated:

Code Section

18 U.S.C. §§ 2244(b), 2246 (3); 49 U.S.C. § 46506

Offense Description

On or about June 15, 2016, within the special maritime and territorial jurisdiction of the United States, Chad Cameron Camp did knowingly engage in sexual contact with a minor female, without that person's permission, while on an aircraft.

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Complainant's signature

Travis R. Gluesenkamp, SA, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: June 16, 2016

Judge's signature

City and state: Portland, Oregon

Stacie F. Beckerman, U.S. Magistrate Judge

Printed name and title

purport to set forth all of the information that I have acquired during the course of this investigation.

APPLICABLE LAW

18 U.S. Code § 2244 - Abusive sexual contact(b); Abusive Sexual Contact (b) In

Other Circumstances.— Whoever, in the special maritime and territorial jurisdiction of the United States or in a Federal prison, or in any prison, institution, or facility in which persons are held in custody by direction of or pursuant to a contract or agreement with the head of any Federal department or agency, knowingly engages in sexual contact with another person without that other person's permission shall be fined under this title, imprisoned not more than two years, or both.

STATEMENT OF PROBABLE CAUSE

As a result of the investigation, I have become aware of the following information:

On 06/15/2016 at approximately 1740 CST, American Airlines flight 2267, Aircraft Identification Number N-981-AN, departed Dallas Ft. Worth Airport for Portland International Airport (PDX). The VICTIM, a female minor, age 13, was seated in seat 21A, the window seat. The VICTIM, who began her travel that day from San Antonio to Dallas, boarded the Dallas to Portland flight, as an unaccompanied minor, meaning she was traveling alone without a legal guardian. CHAD CAMERON CAMP, hereafter referred to as CAMP, was seated in 21B, the middle seat. The flight was not at capacity and there were several open seats on the aircraft, to include the aisle seat 21C to the right of CAMP.

The VICTIM was interviewed in the presence of her mother at the Port of Portland Police Department by SA Travis R. Gluesenkamp and Detective Cora J. Childers of the Port of Portland Police. The VICTIM stated shortly after CAMP took his assigned seat, an American Airlines

Flight Attendant advised CAMP he could change seats if he liked, to which he stated “no I’m fine.” The VICTIM stated the aisle seat was empty. The VICTIM observed CAMP begin to mumble and curse. CAMP allegedly stated the word “fuck” two times. The VICTIM could not make out what CAMP was saying and stated he was not making sense. The VICTIM put in her ear-bud headphones. After putting on her headphones, CAMP began speaking to the VICTIM and asking her where she was coming from and where she was going. CAMP asked the VICTIM if this was her first time traveling to Portland to which she stated she lived there. CAMP replied “me too.” CAMP asked the VICTIM if she was coming from San Antonio, to which the VICTIM replied “yes,” and CAMP replied “me too.” The VICTIM could see CAMP’s boarding pass and observed he was not traveling from San Antonio and was lying about where he began his travel. Camp asked if the VICTIM if she was born in San Antonio, to which the VICTIM replied “yes,” and CAMP replied “me too.”

The VICTIM stated CAMP began to lean against her so she began to lean towards the window to avoid physical contact. The VICTIM stated the armrest was down between them creating a barrier.

The VICTIM stated CAMP pulled a magazine from the seat back storage directly in front of him and began flipping the pages. Each time he turned the page he used his elbow to brush up against the victim’s shoulder and upper arm area. The VICTIM attempted to move away from CAMP’s physical contact, and each time she withdrew, he would laugh. After finishing with the magazine, CAMP leaned toward the VICTIM to place the magazine in the seat pocket in front of the victim. CAMP instead dropped the magazine on the VICTIM’s shoes.

The VICTIM was carrying her boarding pass and Unaccompanied Minor paperwork in a plastic sleeve that is worn on a lanyard around her neck. She had removed the lanyard and placed it in the seat pocket in front of her. CAMP reached over and grabbed the plastic sleeve out of the seat pocket in front of the VICTIM and began reading her boarding pass out loud. After he completed reading it, he lightly threw it back at the VICTIM and it landed at her feet.

CAMP attempted to look out the window by turning his head. He then stood up, leaned into the VICTIM's seat, and put his head up to the window. The VICTIM physically showed the interviewing agents her observations of CAMP's body posture. She described and showed how his face was approximately twelve inches from her face. CAMP returned to his seat and began softly nudging the victim with his elbow. The victim stated she was "frightened," and "didn't know what to do."

The VICTIM pulled her book from the seat pocket in front of her seat to read and distract herself from what was occurring. CAMP had headphones on at this time and was listening to music. He removed one of his headphones from his ear and attempted to hand it to the VICTIM. The VICTIM refused to take it, so CAMP attempted again by moving the headphone closer to the victim. The VICTIM again refused. CAMP then unplugged the headphones, removed them from his ears, and threw them in the VICTIM's lap where they remained until the end of the incident.

The VICTIM stated CAMP then reached over with his left hand and placed it on the VICTIM'S knee and slide it up to the VICTIM'S upper thigh. The VICTIM crossed her right leg over her left and leaned towards the window to break contact with CAMP. CAMP laughed at the VICTIM. The VICTIM stated she could sense "something was up" after the repeated touching and invasions to her personal space. She was frightened and felt trapped. A short time past and

the VICTIM returned to her seat with both feet on the ground. CAMP then placed his left hand on the VICTIM's upper thigh. The VICTIM asked "what are you doing?" and CAMP removed his hand and laughed. He immediately put his hand back on the VICTIM's thigh. The VICTIM physically removed his hand from her thigh and CAMP laughed. CAMP put his hand back on the VICTIM's thigh a third time.

An American Airlines Flight Attendant, hereafter referred to as FLIGHT ATTENDANT 1, was interviewed by Port of Portland Police Officer Harry Trimpler. FLIGHT ATTENDANT 1 was approaching row 21 as part of the complimentary snack service moments after CAMP had placed his hand on the VICTIM's thigh for the third time. FLIGHT ATTENDANT 1 observed CAMP's hand in the VICTIM's crotch area. FLIGHT ATTENDANT 1 stated based on her training and experience, CAMP's hand looked like it had been placed there and not ended up there as an accident. FLIGHT ATTENDANT 1 observed the VICTIM was leaned against the wall facing toward the window. FLIGHT ATTENDANT 1 stated to CAMP "no man, you need to move." CAMP turned and said something to the effect of "what?" FLIGHT ATTENDANT 1 observed the VICTIM turn towards her and she observed what she described as a single tear coming down the VICTIM's cheek. FLIGHT ATTENDANT 1 ordered CAMP to change seats to which he protested and stated he didn't do anything. FLIGHT ATTENDANT 1 moved CAMP to row 30 and moved the VICTIM to row 8. She immediately notified the Captain of the aircraft about what had occurred.

The CAPTAIN was interviewed by Port of Portland Police Officer Harry Trimpler. The CAPTAIN stated he was notified of the incident as the plane reached cruising altitude and estimated the plane had been in the air for 20 minutes.

The VICTIM had to go to the bathroom for the duration of the flight but was too frightened to get up due to possibly seeing CAMP on the plane. Upon landing, the VICTIM was removed from the aircraft along with a “witness,” later identified as WITNESS 1 (statement below). The VICTIM was moved to a different boarding gate away from gate C22 where the plane had arrived. The VICTIMs stepfather had been brought to gate C22 to meet the VICTIM as she exited the aircraft and assumed custody of the VICTIM upon her exiting the aircraft. CAMP was removed from the aircraft and seated in the immediate vicinity of gate C22. The VICTIM had to use the restroom, and the nearest restroom required a short walk past gate C22. She went to the restroom unaccompanied, but as soon as she could observe gate C22, she could see CAMP and returned to her stepfather frightened and crying. She was escorted to the restroom by her stepfather with the VICTIM shielded from CAMP’s line of sight.

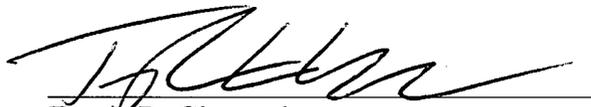
A WITNESS, hereafter referred to as WITNESS 1, was aboard the American Airlines flight 2267 from Dallas to Portland. While waiting to board the flight in Dallas, WITNESS 1 sat in a bar near the departure gate. Seated at the bar next to WITNESS 1 was CAMP. Both CAMP and WITNESS 1 were in the bar for approximately one hour. During that time, WITNESS 1 observed CAMP consume four mixed alcoholic drinks. CAMP made small talk with WITNESS 1 about basketball and living in Portland. WITNESS 1 stated CAMP did not display any visible signs of intoxication while at the bar. WITNESS 1 was not seated near CAMP, and did not observe the alleged sexual contact aboard the aircraft. WITNESS 1 learned of the incident after the VICTIM and CAMP had been moved to different seats.

Conclusion

Based on the aforementioned information, I have probable cause to support a criminal complaint for CHAD CAMERON CAMP for a violation of Title 18, U.S.C. Section 2244(b)

Abusive Sexual Contact (b) In Other Circumstances; an arrest warrant should be issued for his arrest by the United States District Court for the District of Oregon.

This affidavit, the accompanying criminal complaint, and the requested arrest warrant were reviewed by Assistant United States Attorney Tom Edmonds prior to being submitted to the court. AUSA Edmonds informed me that in his opinion, the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested warrant.



Travis R. Gluesenkamp
Special Agent, Federal Bureau of Investigation

Subscribed and sworn to before me this 16th day of June 2016.



The Honorable Stacie F. Beckerman
United States Magistrate Judge