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AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Amanda Jawad
Special Agent: Kyle Dodge

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
PRABHU RAMAMOORTHY

Case: 2:18-mj-30003
Judge: Unassigned,
Filed: 01-03-2018 At 12:54 PM
USA V RAMAMOORTHY (CMP)(CMC)

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 January 3, 2018 in the county of Wayne and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 2241(a)	Aggravated Sexual Abuse

This criminal complaint is based on these facts:
See Attached Affidavit.

Continued on the attached sheet.



Complainant's signature

Kyle Dodge, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: January 3, 2018

City and state: Detroit, MI



R. STEVEN WHALEN, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Special Agent Kyle J. Dodge, swear and affirm as follows:

INTRODUCTION

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) for over twenty years, and am currently assigned to the Detroit Division of the FBI as a liaison to the Detroit Metropolitan Airport. I have participated in investigations of crimes aboard aircrafts for more than five years.

2. As a Special Agent of the FBI, I am authorized to investigate violations of the laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

3. The information set forth herein is based on my personal knowledge, as well as reports and information provided by other law enforcement officers. I have not set forth every fact resulting from the investigation; rather, I have set forth a summary of the investigation to date in order to establish that PRABHU RAMAMOORTHY did commit Aggravated Sexual Abuse aboard an aircraft traveling to Detroit Metropolitan Airport in Detroit, Michigan in violation of 18 U.S.C. § 2241(a).

DETAILS OF THE INVESTIGATION

4. On January 3, 2018, I received information that a twenty-two-year-old female (“Adult Victim 1” or “AV-1”) reported being sexually assaulted on an

airplane. AV-1 was traveling on a Spirit Airlines flight from Las Vegas, NV to Detroit, MI, which landed on the morning of January 3.

5. AV-1 reported that she was seated in a window seat next to a man, later identified as RAMAMOORTHY. She fell asleep leaning against the window. She woke up to a hand in her pants and noticed that her pants and shirt were unbuttoned. She stated that the man next to her was shoving his fingers in her vagina and vigorously moving them. When she fully woke up, the man stopped. AV-1 immediately reported the incident to a flight attendant.

6. Two flight attendants reported that AV-1 approached them and stated that a male passenger had sexually assaulted her. The flight attendants report that AV-1 appeared visibly upset and was crying.

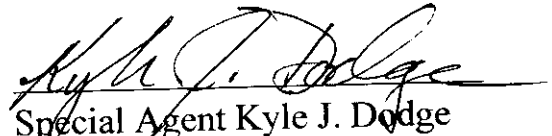
7. RAMAMOORTHY was taken into custody at the Wayne County Airport Authority. RAMAMOORTHY made a written statement stating that he was in "deep sleep," and that AV-1 fell asleep on his knees and he is "not sure where [he] kept the hand on her." He stated "through my knowledge I didn't [sic] anything to her."

8. RAMAMOORTHY was later interviewed by agent and gave an additional verbal statement. This time, he stated that he "might have" un-done AV-1's bra while playing with it, and that he had cupped her breast over her clothes. He

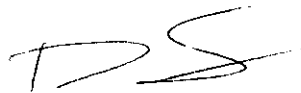
also indicated that he unzipped her pants part-way, and did put his finger into her pants. He stated that he tried to put his finger in her vagina but was not successful.

9. Based on my training and experience, there is probable cause to believe that RAMAMOORTHY violated 18 U.S.C. § 2241(a) by knowingly causing another person to engage in a sexual act by using force against that person.

10. This court has jurisdiction over this crime pursuant to 49 U.S.C. §§ 46501 and 46506, because the crime was committed on an aircraft in flight that had its next scheduled destination in Detroit, Michigan.


Special Agent Kyle J. Dodge
Federal Bureau of Investigation

Sworn to before me and subscribed
In my presence, this 3rd day of January, 2018.



R. STEVEN WHALEN
UNITED STATES MAGISTRATE JUDGE