

AB:PC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(49 U.S.C. § 46504)

CHENASIA I. CAMPBELL,

Case No: 21-MJ-530

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Anthony Apath, being duly sworn, deposes and states that he is a U.S.

Customs and Border Protection Officer assigned to the Federal Bureau of Investigation Joint  
Terrorism Task Force, duly appointed according to law and acting as such.

Upon information and belief, on or about May 2, 2021, within the Eastern  
District of New York and elsewhere, while on an aircraft in the special aircraft jurisdiction of  
the United States, the defendant CHENASIA I. CAMPBELL, did knowingly and  
intentionally assault and intimidate a flight attendant of the aircraft, interfere with the  
performance of the duties of the flight attendant, and lessen the ability of the flight attendant  
to perform those duties.

(49 U.S.C. § 46504)

The source of your deponent's information and the grounds for his belief are  
as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts

1. I am a U.S. Customs and Border Protection Officer assigned to the Federal Bureau of Investigation Joint Terrorism Task Force and have been involved in the investigation of numerous cases involving the violations of federal law at airports. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and reports of other law enforcement officers involved in the investigation.

2. On or about May 2, 2021, the defendant arrived at Terminal 8 in John F. Kennedy International Airport (“JFK”) in Queens, New York aboard American Airlines flight AA1357 from Miami, Florida.

3. Prior to arriving at JFK, and approximately midway through the flight, the defendant left her seat, followed a flight attendant to a crew area of the plane, and began yelling at that flight attendant for not picking up her garbage. The flight attendant requested assistance from the Victim, who is also a flight attendant. The Victim attempted to separate the defendant from the flight attendant, at which point the defendant accused the Victim of pushing her. The defendant then struck the Victim with closed fists and pulled the Victim’s hair.

4. The defendant and Victim then became separated, and the defendant walked towards the lavatory in another part of the plane and began arguing with another passenger. The defendant then reapproached the Victim in the crew area of the plane and began yelling obscenities. The defendant stated to the Victim that the “cops aren’t going to do anything to me,” and then struck the Victim with closed fists, causing the two of them to

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necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

fall to the floor. At some point during the altercation, the defendant attempted to pull up or remove the Victim's dress.

5. The flight attendant crew requested that the captain land the plane, but that request was denied. An off-duty New York City Police Department officer aboard the flight intervened and placed the defendant in hand restraints for the remainder of the flight. The plane landed at JFK where the defendant was taken into custody.

6. The Victim sustained scrapes to the arm and cheek, bruises to the forehead and leg, swollen hands from defending herself, and a strained neck as a result of being pulled to the floor by the defendant. The Victim was evaluated by medical personnel at JFK and refused additional medical assistance. Due to her injuries, the Victim's ability to perform her duties for the remainder of the flight was lessened.

7. It is your deponent's understanding that the plane in question is a "civil aircraft of the United States," pursuant to Title 49, United States Code, Section 46501(2)(a), in that it is registered by American Airlines under Chapter 441 of Title 49. See 49 U.S.C. § 40102(a)(17). It is further your deponent's understanding that the plane was "in flight" as defined in Title 46, United States Code, Section 46501(1), during the events described herein.

WHEREFORE, your deponent respectfully requests that the defendant  
CHENASIA I. CAMPBELL be dealt with according to law.

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Anthony Apath  
Officer  
United States Department of Homeland Security  
Customs and Border Protection

Sworn to before me by reliable electronic means  
this 3rd day of May, 2021

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THE HONORABLE PEGGY KUO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK