
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Edward S. Kiel, U.S.M.J.
 :
 v. : Mag. No. 23-15145
 :
 HASAN NASER HUSSAIN ALENEZI : **CRIMINAL COMPLAINT**

I, Robert DiRocco, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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 B

Continued on the attached page and made a part hereof.

s/ Robert DiRocco

Robert DiRocco, Special Agent
Federal Bureau of Investigation

SA DiRocco attested to this Complaint
by telephone pursuant to FRCP 4.1(b)(2)(A)
on June 21, 2023 in the District of New Jersey

s/Honorable Edward S. Kiel

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A
(Abusive Sexual Contact)

From on or about November 27, 2022 through on or about November 28, 2022, in the District of New Jersey and elsewhere, the defendant,

HASAN NASER HUSSAIN ALENEZI,

in the special aircraft jurisdiction of the United States, knowingly engaged in sexual contact, as defined in Title 18, United States Code, Section 2246(3), with another person (the Victim), without the Victim's permission.

In violation of Title 18, United States Code, Section 2244(b) and Title 49, United States Code, Section 46506.

ATTACHMENT B

I, Robert DiRocco, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about November 27, 2022, defendant Hasan Naser Hussain Alenezi (“Alenezi”) was a male passenger aboard United States flight 645 (the “Flight”), departing from Los Angeles, California at approximately 10:55 p.m. Pacific Standard Time, and arriving at Newark Liberty International Airport in Newark, New Jersey at approximately 7:45 a.m. Eastern Daylight Time, a flight commonly referred to as the “red eye,” given the timing.

2. A male passenger (“Passenger A”) was assigned to the middle seat in the same row as a female passenger (the “Victim”) who was seated in the window seat. However, upon boarding the aircraft, Alenezi sat in Passenger A’s seat, which was immediately adjacent to the Victim. Passenger A sat in Alenezi’s ticketed seat, which was in a different row. The Victim did not know Alenezi or Passenger A.

3. During the Flight, the Victim placed a blanket over her head in order to sleep. Some period of time later, the Victim awoke to find that Alenezi was tapping on her left leg. The Victim pushed Alenezi’s hand away, curled her legs and turned her body away from Alenezi, and tried to fall back asleep.

4. A short while later, the Victim was awoken again, this time to find that Alenezi had reached around the Victim’s curled legs and placed his hand on her groin on top of her clothing, without the Victim’s permission. Upon noticing Alenezi’s hand touching her groin, the Victim told Alenezi to stop, and that if he did not stop, she would report him to a flight attendant. The Victim repositioned her blanket to block her body from Alenezi.

5. At some point thereafter, the Victim felt Alenezi reach under the blanket and again touch her groin with his hand, without the Victim’s permission. Alenezi told the Victim, in sum and substance, “You know you want it,” at which point the Victim responded, “No I don’t.” The Victim, who was connected to the aircraft’s WiFi network, sent text messages to a close family

member about the incident, who instructed the Victim to report Alenezi's conduct to a flight attendant.

6. The Victim stood up from her seat and sought the assistance of a flight attendant ("Flight Attendant-1"). When the Victim told Flight Attendant-1 that Alenezi had touched her without her permission, Flight Attendant-1 relayed Alenezi's complaint to the lead flight attendant ("Flight Attendant-2"), who moved the Victim to a new seat in the Business Class section for the remainder of the flight.