

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

CASE NUMBER: 8:09

RAED ABDUL-RAHMAN ALSAIF

8:09 MJ 1263 TBM

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 June 4, 2009, in Hillsborough County, in the Middle District of Florida, defendant did,

in attempting to board an aircraft intended for operation in air transportation, did have about his property a concealed dangerous weapon that would be accessible to him in flight,

in violation of Title 49, United States Code, Section 46505(b)(1). I further state that I am a Special Agent with the Transportation Security Administration and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

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



Signature of Complainant
Gregory J. Mertz


Sworn to before me and subscribed in my presence,

June 10, 2009

at

Tampa, Florida

THOMAS B. McCOUN
United States Magistrate Judge
Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

Gregory J. Mertz, affiant, being duly sworn, deposes and states:

I am a Special Agent with the Transportation Security Administration, Tampa, FL., and have been so assigned since September, 2002. Prior to that time, I served as a Special Agent with the U.S. Secret Service for 21 years. I have completed numerous training programs in law enforcement and criminal investigations, including: Criminal Investigator Training, U.S. Secret Service Special Agent Training, Criminal Psychological Profiling, and Hostage Management. In the course of my career in law enforcement, I have participated in numerous investigations of violations of federal law and have also supervised numerous special agents in the conduct of their own federal criminal investigations.

I base this affidavit upon my personal investigation and the investigation of other Transportation Security Administration Officers ("TSA") and the Tampa International Airport Police ("TIAPD"), Immigration and Customs Enforcement agents ("ICE"), hereinafter referred to as "agents". This affidavit does not contain all information known to agents in the course of this investigation.

On June 4, 2009 passenger RAED ABDUL-RAHMAN ALSAIF approached the boarding area for passenger screening at Tampa International Airport. ALSAIF was ticketed to travel on US Airways flight number 1077 from Tampa to Phoenix, Arizona and to a final destination of Portland, Oregon. ALSAIF submitted three bags to TSA officers for screening prior to entering the gate area at the airport to await his flight.

TSA Transportation Security Officer ("TSO") Jose Arroyo observed the bags as they passed through his x-ray screening machine. During the screening process, TSO Arroyo observed what appeared to be the image of a large butcher/chef's knife inside one of the bags. The bag was a black nylon "roll-aboard" style. TSO Arroyo notified his supervisor and initiated a full bag check per TSA protocol. Lead Transportation Security Officer ("LTSO") Mac Rodriguez took control of the bag from the x-ray machine and identified RAED ABDUL-RAHMAN ALSAIF as the person in possession of the bag. LTSO Rodriguez found the knife "artfully" concealed between the outside fabric and the expandable pull handles of the bag, in a readily accessible manner, but concealed from view without use of an x-ray machine. The knife, commonly known as a "Santoku", is a general-purpose kitchen knife originating in Japan. The knife's blade is seven and one-quarter inches long and has a flat edge that curves in an angle at the point. TSA personnel contacted officers of the TIAPD and alerted them to the situation.

TIA Police Officer Kirsner Garcon arrived at the screening area and took control of the bag and knife. Officer Garcon then came in contact with the passenger who had submitted the bag for screening, RAED ABDUL-RAHMAN ALSAIF. Officer Garcon placed the defendant under arrest for violation of state concealed weapon laws.

After his arrest, ALSAIF made a statement denying knowledge of the knife and stated that he had obtained the bag from a friend and had no knowledge of the knife in it. Investigating agents later made contact with that other named person, who indicated that the bag did not belong to him and that he had not provided either a bag or the knife in question to ALSAIF.

Based on his training, experience, observations, review of the evidence, and witness information, your affiant believes there is probable cause to charge the subject


RAED ABDUL-RAHMAN ALSAIF with attempting to board an aircraft intended for interstate air transportation with a concealed dangerous weapon that would be accessible to him in flight, in violation of 49 United States Code. Section 46505(b) (1).

Further your affiant sayeth naught.



Gregory J. Meitz

Sworn before me this
12 day of June, 2009



THOMAS B. McCOUN, III
United States Magistrate Judge