

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ORIGINAL FILED

AUG 18 2010

UNITED STATES OF AMERICA

Hon. Patty Shwartz

PATTY SHWARTZ
U.S. MAG. JUDGE

v.

Mag. No. 10-3183

JENNIFER STEPLIGHT

CRIMINAL COMPLAINT

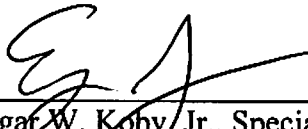
I, Edgar W. Koby, Jr., being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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 pages and made a part hereof.


Edgar W. Koby, Jr., Special Agent
Federal Bureau of Investigation

Sworn to before me, and
subscribed in my presence
on the ___ day of August, 2010
at Newark New Jersey


HONORABLE PATTY SHWARTZ
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

COUNT 1

From at least on or about December 28, 2009 through on or about July 6, 2010, in Union County in the District of New Jersey and elsewhere, defendant

JENNIFER STEPLIGHT

being an officer and employee of the United States and of any department or agency thereof, knowingly and willfully embezzled and wrongfully converted to her own use the money and property of another which came into her possession and under her control in the execution of such office and employment, and under color and claim of authority as such officer and employee, with the sum embezzled being \$1000.00 or less.

In violation of Title 18, United States Code, Section 654 and Section 2.

COUNT 2

From at least on or about December 28, 2009 through on or about July 6, 2010, in Union County in the District of New Jersey and elsewhere, defendant

JENNIFER STEPLIGHT

in a matter within the jurisdiction of the executive, legislative, and judicial branch of the government of the United States, knowingly and willfully made and used false writings and documents knowing that they contained materially false, fictitious, and fraudulent statements and entries.

In violation of Title 18, United States Code, Section 1001(a)(3) and Section 2.

ATTACHMENT B

I, Edgar W. Koby, Jr., am a Special Agent with Federal Bureau of Investigation ("FBI"). 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 items of evidence. Where statements of others are related herein, they are related in substance and part. 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 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. At all times relevant to this complaint, the Transportation Security Administration ("TSA") was a department or agency of the United States government. Among other responsibilities, TSA conducts security screening of airline passengers and the personal property of airline passengers at airports. These screenings take place at checkpoints located throughout an airport. For items that are lost at TSA checkpoints and other airport areas under TSA control, TSA secures those items at a "Lost and Found" facility where the property may be claimed by the owner. For Newark Liberty International Airport ("Newark Airport"), the TSA Lost and Found Department is located at a TSA facility located at or about 1085 Morris Avenue, Union, New Jersey 07083, in the District of New Jersey. Lost property from TSA areas at Newark Airport is transported to this facility and logged into a TSA computer database. Owners of lost property may present themselves at the facility, complete a form to claim the property, and then collect the property.

2. Defendant JENNIFER STEPLIGHT was employed by TSA as a Master Transportation Security Officer-Coordination Center Officer ("MTSO-CCO"), beginning on or about April 4, 2004 through and including July 6, 2010. At all times relevant to this complaint, defendant STEPLIGHT was employed at the TSA facility located at or about 1085 Morris Avenue, Union, NJ 07083. In her capacity as a MTSO-CCO, one of STEPLIGHT'S duties was to maintain records for the TSA Lost and Found Department for Newark Airport.

3. Based on information from a confidential source (the "CS"), law enforcement agents began an investigation into the theft of laptop computers from the TSA Lost and Found Facility described above. The CS told law enforcement agents, in substance and in part, that: in early 2010, the CS and co-conspirator #1 ("CC1") traveled to Liberty Hall Museum located at or about 1003 Morris Avenue, Union, New Jersey 07083. CC1 instructed the CS to go inside the museum and retrieve a laptop computer for him from a female he identified as his cousin. CC1 further told the CS that this person was his connection to get computers and other merchandise. The CS proceeded into the museum and met with a female who identified herself as "Jessica." The CS observed that "Jessica" was wearing a TSA uniform with Department of Homeland Security and TSA patches on the arms of her uniform. The CS approached "Jessica" and told her that CC1 had sent the CS to pick up CC1's bag. "Jessica" provided the CS with a laptop computer, which the CS subsequently gave to CC1.

4. The CS was subsequently shown a photo array that include a photograph of defendant STEPLIGHT. The CS identified the photograph of defendant STEPLIGHT as the person who identified herself as "Jessica" and who gave the CS the laptop computer.

5. On or about June 30 and July 1, 2010, defendant STEPLIGHT was interviewed by law enforcement agents and stated the following in substance and in part: from in or about December 2009 to in or about January 2010, defendant STEPLIGHT stated that she

removed four laptop computers from the TSA Facility. Defendant STEPLIGHT further explained that CC1 told her what names and information to use to fill out the claim forms associated with the laptop computers she stole. Defendant STEPLIGHT further explained that she gave two of the laptop computers to CC1 and the other two laptop computers to two individuals who CC1 arranged to have pick up the laptop computers. When interviewed by law enforcement agents, defendant STEPLIGHT had in her possession the two stolen laptop computers she had given personally to CC1—a Sony and a Toshiba—and she consensually provided both laptop computers to law enforcement agents.

6. On or about July 1, 2010, defendant STEPLIGHT submitted a written statement to law enforcement agents in which she admitted that she “took the laptops” and that she stole “4 laptops in total.”

7. On or about July 29, 2010, defendant STEPLIGHT was interviewed by law enforcement agents and stated the following in substance and in part:

a. Defendant STEPLIGHT explained that it was part of her responsibilities as an MTSO-CCO to handle unclaimed property at the TSA Lost and Found facility.

b. Defendant STEPLIGHT was shown two TSA Lost and Found claim forms, which she identified as forms she completed with false information to effectuate her theft of the laptop computers from the TSA facility. Defendant STEPLIGHT further explained that she removed the laptop computers listed on the forms and provided them to two different individuals at the direction of CC1. One of the claim reports listed the claimant’s address in Irvington, New Jersey and had a driver’s license number handwritten on it. Defendant STEPLIGHT acknowledged that she handwrote the driver’s license number, but could not recall if the individual who retrieved the laptop computer presented a driver’s license or if defendant STEPLIGHT made up the number. A check with the New Jersey Motor Vehicle Commission reported no record of the driver’s license number listed on the claim form.

c. Defendant STEPLIGHT was also shown a TSA Lost and Unclaimed Daily Inventory Record dated February 5, 2009 that contained a listing for a Sony laptop computer. Defendant STEPLIGHT admitted that she stole this laptop computer in early 2010 and falsely created the entry on the inventory record to conceal her theft. Defendant STEPLIGHT further admitted that the Sony laptop computer was one of the computers she turned over to law enforcement agents.

d. Defendant STEPLIGHT was also shown a printout from the TSA Lost and Found database that listed a Toshiba laptop computer. Defendant STEPLIGHT admitted that this listing was for the Toshiba laptop computer she stole and subsequently turned over to law enforcement agents.