

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	
)	INFORMATION <i>11mj240 AJB</i>
Plaintiff,)	
)	(18 U.S.C. § 113(a)(4))
v.)	(49 U.S.C. § 46501(2)(C))
)	(49 U.S.C. § 46506(1))
ROBERT M. LEE,)	
)	
Defendant.)	

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1
(Assault)

On or about September 21, 2010, on an aircraft in the special aircraft jurisdiction in the United States, to wit: aboard a Gulfstream with tail number N461GT, which originated in Show Low, Arizona, and was bound for Rochester, Minnesota, in the District of Minnesota, the defendant ROBERT M. LEE did knowingly and intentionally assault by striking and wounding, M.L., an adult female, by forcibly grabbing and violently twisting her breast.

Specifically, the defendant was traveling as a passenger in his private airplane from Arizona to Minnesota, while under the care of M.L. (a paramedic and respiratory therapist) and M.D. (a registered nurse). The defendant was traveling to a hospital located in Rochester, Minnesota.

When M.L. assisted the defendant in returning to his seat, the defendant reached up with his left hand and grabbed the right breast of M.L. He forcibly and violently grabbed and twisted the nipple of M.L.'s right breast, causing M.L. substantial pain.

SCANNED
JUN 14 2011
U.S. DISTRICT COURT MPLS

FILED JUN 13 2011
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTERED _____
DEPUTY CLERK'S INITIALS _____

M.L. immediately pushed ROBERT M. LEE's hand away and stated, "You do not get to touch me like that. Do not do that again!"

ROBERT M. LEE responded, "I can do whatever I want. This is my airplane."


Shortly thereafter, the defendant reached across the aisle of the airplane and gestured to M.D. with his thumb and forefinger in a pinching motion, stating, "That's what I'm going to do to you."

When M.D. told ROBERT M. LEE that he was not allowed to touch medical crew in that manner, he responded, "On my airplane, I can do whatever I want." The defendant then told M.D. that she should be wearing a V-neck shirt so that he could slide his hand in her shirt more easily.

All in violation of Title 18, United States Code, Section 113(a)(4), and Title 49, United States Code, Sections 46501(2)(C) and 46506(1).

Dated: June 13, 2011

B. TODD JONES
United States Attorney


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Attorney Reg. No. 0329691