

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Martin H. Daniell III, Special Agent with the Federal Bureau of Investigation, Department of Justice, being duly sworn, deposes and states under penalty of perjury the following is true to the best of my information, knowledge, and belief.

BACKGROUND OF AFFIANT:

1. Your affiant is a Special Agent with the Federal Bureau of Investigation (FBI) and has been so for over twenty-one years. Your affiant is currently assigned as the FBI Airport Liaison Agent at Denver International Airport (DEN) and investigates violations of federal law that occur at the airport, as well as crimes that occur in the Special Aircraft Jurisdiction of the United States and incidents involving the laser illumination of aircraft in flight.

STATEMENT OF FACTS:

2. On March 9, 2021, at approximately 5:00 p.m., your affiant was advised of a disturbance aboard Alaska Airlines Flight 1474 that occurred while the flight was in route from Seattle-Tacoma International Airport (SEA) to Denver, Colorado (DEN). Your affiant responded to Gate C-39 at Denver International Airport where he spoke to officers from the Denver Police Department, reviewed statements written by flight crew members and passenger witnesses. Your affiant also conducted follow-up interviews. This investigation revealed the following:
3. During the flight from Seattle to Denver, a female Alaska Airline flight attendant, herein identified by the initials C.E., noticed that twenty-four year old male passenger Landon Perry Grier was not wearing a face covering, as required by airline policy due to the COVID-19 pandemic. She approached Grier and asked him approximately eight to ten times to put his face covering on. Grier was seated next to the window and appeared to be attempting to sleep. Grier ignored

C.E. and then began to push and swat her hand away as she tried to gently tap his shoulder to get his attention. While doing this, he made contact with her right forearm approximately three times. He subsequently struck her arm two to three times in an attempt to aggressively dismiss her. During this incident, his strikes resulted in actual physical contact with flight attendant C.E. When interviewed, C.E. stated that Grier disrupted the entire safety of the aircraft by refusing to wear his face covering.

4. Later in the flight, two other Alaska Airlines female flight attendants, herein identified by the initials K.F. and K.K., responded to a flight attendant call button that had been pressed. A passenger reported to flight attendant K.K. that passenger Grier was urinating in his seat area and K.K. observed him doing this and told him to sit down. Flight attendant K.F. then observed passenger Grier seated in his seat with his penis out of his pants and she told him to put his penis back in his pants. He responded, "I have to pee." Several of the passengers seated around passenger Grier were then reseated and the Captain was called to notify him of what had happened. Flight attendant K.F. stated passenger Grier's actions delayed her preparation of the aircraft cabin for landing for approximately ten minutes, endangering the safety of the passengers. Flight attendant K.K. said she was unable to clean up the cabin because her attention was on passenger Grier instead of her assigned duties. Moreover, the flight experienced a mechanical issue that caused the flight crew to make an emergency landing at DIA.
5. Forty-eight year old male M.S. was the Pilot in Command (Captain) of Flight 1474. He advised he and the first officer had declared an emergency to air traffic control due to a maintenance issue onboard their aircraft and their landing briefing was interrupted by the call from K.F. who told him about passenger

Grier's behavior. He stated the passenger disruption occurred during a high work load environment while they were descending over the mountains in turbulent conditions. The disruption caused the pilot crew to divert attention from their emergency landing preparation.

6. Your affiant also spoke with a female passenger identified herein by the initials J.C. She said passenger Grier first got her attention when he swatted at the flight attendant when she asked him to put his mask on. She advised later he stood up, took out his penis, and began peeing which wet a paper bag she had with her.
7. After obtaining these statements, I also met with Grier. After being advised of his *Miranda* rights, he agreed to speak to your affiant without a lawyer present. During the subsequent conversation, passenger Grier advised he was returning from Alaska where he had been working in a gold mine. Prior to leaving Alaska, he had one beer and then had three to four beers and "a couple of shots" before boarding the plane in Seattle. He also took an over-the-counter pain reliever because he had body aches from working. He said he fell asleep on the plane and awoke to being yelled at by the flight attendants who told him he was peeing. He stated he had no recollection of hitting the flight attendant and didn't know if he was peeing.
8. The incident as described herein occurred while Alaska Airlines Flight 1474 was operating in the special aircraft jurisdiction of the United States.

CONCLUSION:

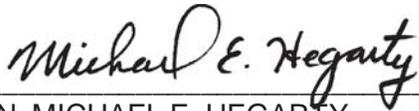
Based upon the above information, probable cause exists to believe Landon Perry Grier has violated Title 49, United States Code, Section 46504 - Interference with Flight Crew

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Members and Attendants. I declare under the penalty of perjury the foregoing information is true to the best of my knowledge.

s/Martin H. Daniell III
Special Agent
Federal Bureau of Investigation

Submitted, sworn to, and acknowledged by reliable electronic means on 10th day of March, 2021.



HON. MICHAEL E. HEGARTY
United States Magistrate Judge

Affidavit reviewed and submitted by Bradley W. Giles, Assistant United States Attorney.