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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. : Mag. No. 21-12167

SENENCA WILSON, :  
a/k/a "Seneca Wilson"

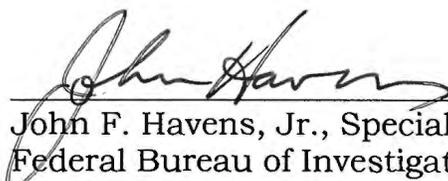
I, John F. Havens, Jr., being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**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:

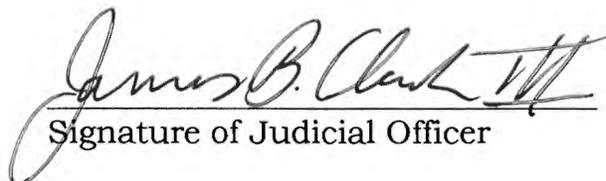
**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
John F. Havens, Jr., Special Agent  
Federal Bureau of Investigation

Attested to by telephone pursuant to  
Fed. R. Crim. P. 4.1(b)(2)(A) on April 13, 2021  
in the District of New Jersey

HONORABLE JAMES B. CLARK, III  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**  
(Bank Robbery)

On or about April 7, 2021, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

**SENENCA WILSON,**

did, by force, violence, and intimidation, knowingly take from the person and presence of another, namely, employees of Victim Bank-1 located in Rutherford, New Jersey, approximately \$2,300 in money belonging to, and in the care, custody, control, management, and possession of Victim Bank-1, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

## **ATTACHMENT B**

I, John F. Havens, Jr., am a Special Agent with the Federal Bureau of Investigation and 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 photographs of the 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. On or about April 7, 2021 at approximately 4:12 p.m., defendant Senenca Wilson entered Victim Bank-1 in Rutherford, New Jersey wearing a thin windbreaker over a dark t-shirt. The dark t-shirt had what appeared to be a white logo on the left breast area. Wilson was also wearing a dark New York Yankees baseball cap, sunglasses, a neck gaiter over his face, and a glove on his left hand.

2. Wilson handed the teller a note which, in substance and in part, demanded money with no straps on the bills. The teller then put approximately \$2,300 in United States currency into a white plastic bag that the Wilson had provided. Wilson then took the bag of cash and walked out of the bank.

3. Moments later, a doorbell video camera on a nearby residence recorded footage of Wilson running south down the sidewalk away from Victim Bank-1. Wilson's face can clearly be seen on the video. Although Wilson was not wearing a baseball cap, sunglasses, neck gaiter, or windbreaker in the video, he did appear to be wearing a dark t-shirt with a white logo on the left breast area. The Yankees baseball cap that Wilson wore during the robbery was found by law enforcement in a recycling bin near Victim Bank-1.

4. In the video, Wilson ran down the street and disappeared from view. A few seconds later, a car registered to Wilson can be seen driving away from the area.

5. Law enforcement obtained data, including a photograph, from a license plate reader near Victim Bank-1 showing that at approximately 3:57 p.m. on April 7, 2021—only 15 minutes before the robbery of Victim Bank-1—Wilson's car was driving in Rutherford, New Jersey, less than a mile from Victim Bank-1.