

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America)

v.)

BRUCE WAYNE HIGGINS)

Case No.)

17-5509 (KMW))

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 15 and 16, 2016 in the county of Cape May in the District of New Jersey, the defendant(s) violated:

Code Section	Offense Description
18 U.S.C. Section 2113(a)	Count 1-- on December 15, 2016, the defendant robbed the TD Bank in Ocean City, New Jersey; and Count 2 -- on December 16, 2016, the defendant robbed the Wells Fargo Bank in Atlantic City, New Jersey. For further detail, see Attachment A.

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.

Signature of Joseph P. Furey, Special Agent, FBI

Sworn to before me and signed in my presence.

Date: 03/03/2017


Signature of Judge Karen M. Williams

City and state: Camden, New Jersey

Hon. Karen M. Williams, U.S. Magistrate Judge

CONTENTS APPROVED

UNITED STATES ATTORNEY

By: 
Assistant U.S. Attorney Diana Vondra Carrig
Date: March 3, 2017

ATTACHMENT A

COUNT 1

On or about December 15, 2016, at Ocean City, in the District of New Jersey, and elsewhere, the defendant,

BRUCE WAYNE HIGGINS, JR.,

knowingly, by force and violence, and by intimidation, did take from an employee and presence of an employee of the TD Bank, 101 East 9th Street, Ocean City, New Jersey, approximately \$500.00 belonging to, and in the care, custody, control, management, and possession of TD Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

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

COUNT 2

On or about December 16, 2016, at Atlantic City, in the District of New Jersey, and elsewhere, the defendant,

BRUCE WAYNE HIGGINS, JR.,

knowingly, by force and violence, and by intimidation, did take from an employee and presence of an employee of the Wells Fargo Bank, 1301 Atlantic Avenue, Atlantic City, New Jersey, approximately \$1,179.00 belonging to, and in the care, custody, control, management, and possession of Wells Fargo Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

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

ATTACHMENT B

I, Joseph P. Furey, Special Agent with the Federal Bureau of Investigation (“FBI”), have knowledge of the following facts based on my own investigation and upon conversations with other individuals involved in this investigation. I have not included in this Affidavit all of the facts known to me. Rather, I have included only those facts which I believe are necessary to establish probable cause. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part:

1. I have been employed as an FBI Special Agent for approximately twenty-nine years, and am currently assigned to the Atlantic City Resident Agency (“ACRA”) of the Newark Division, located in Northfield, New Jersey, where I investigate violent crimes, including bank robberies.
2. On Thursday December 15, 2016, the FBI and other law enforcement agencies conducted an investigation into the robbery of the TD Bank branch located at 101 East 9th Street, Ocean City, New Jersey, Cape May County, New Jersey (hereafter “TD Bank”).
3. Detectives and uniformed officers from the Ocean City Police Department (“OCPD”), investigators from the Cape May County Prosecutor's Office (“CMCPO”) and an agent from the FBI, ACRA, responded to the bank and conducted an initial investigation.
4. Investigators obtained the following information based on witness interviews and a review of security camera recordings from the date and time of the robbery:

At approximately 1:01 p.m., a white male robber later identified as the defendant BRUCE WAYNE HIGGINS (“HIGGINS”) entered the TD Bank and walked directly to the Customer Service Desk. Witnesses described the robber as a white male, approximately forty years old, bald, approximately 6’ tall and 225 pounds and wearing a green army type shirt/jacket. While at the Customer Service Desk, the robber appeared to write on a piece of paper,

believed to be the demand note. The robber walked directly to the teller's counter and presented a demand note to the victim teller, which read: "GUN IN Pocket, MONEY NOW or -BANG-." The teller complied with the demand and began to remove money from the top teller's drawer. The robber reached over the counter and took approximately \$500 from the teller and then fled the bank on foot. The bank's digital surveillance system was operational and recorded clear images of the robber in the bank.

5. Investigators reviewed the recording from the bank's surveillance system which showed the robber before the robbery, walking toward the TD Bank from the area of 9th Street and Bay Avenue. The robber appeared to have gotten out of a taxi cab.
6. The OCPD sent out a "be-on-the-lookout" ("BOLO") advisory to the local police agencies in an attempt to identify the robber. On December 15, 2016, a patrolman from the Atlantic City Police Department ("ACPD") called detectives from the OCPD after reviewing the "BOLO" at his department. The patrolman advised that on Wednesday, December 14, 2016 at approximately 9:00 p.m., he and another ACPD officer responded to a call involving an individual named BRUCE WAYNE HIGGINS at the Golden Nugget Hotel and Casino in Atlantic City ("Golden Nugget"). The patrolman believed HIGGINS was the individual pictured in the "BOLO" and explained that he was called to the Golden Nugget because HIGGINS refused to pay a limousine driver the fare due. After HIGGINS agreed to pay the fare in full, the officers left without issuing any criminal complaints. The officers observed HIGGINS with a large amount of currency and positively identified HIGGINS through HIGGINS' Virginia driver's license.
7. On December 15, 2016, an OCPD detective spoke with the driver of the limousine involved in the incident at the Golden Nugget with HIGGINS. The driver explained that HIGGINS called the company via the cellular phone number (571) 352-6722 on December 14, 2016, at approximately 3:00 p.m. and requested to be picked up at 313 North Gilmor Street in Baltimore, Maryland and driven to the Golden Nugget in Atlantic City, New

Jersey. According to the driver, HIGGINS had two adult female companions with him.

8. During the evening hours on December 15, 2016, OCPD detectives received a phone call from a freelance casino host at the Golden Nugget. The host informed the detectives that he saw a photograph of the TD Bank robbery suspect which was posted on the OCPD's Facebook page on December 15, 2016. The host believed that the person in the picture was an individual he knew to be BRUCE WAYNE HIGGINS.
9. Subsequently on December 15, 2016, an agent from the FBI contacted the host, who said that he knew HIGGINS through his job as a host, and provided the following information:
 - a. On December 14, 2016, the host had received several phone calls and text messages from HIGGINS asking for the host to "comp" him a room at the Golden Nugget. The host explained that he did not immediately remember HIGGINS. During the calls, HIGGINS reminded the host they knew each other through a mutual friend that had previously gambled at the Golden Nugget. After his initial conversation with HIGGINS, the host contacted the mutual friend as a reference for HIGGINS. The friend told the host not to trust HIGGINS because of his past troubles.
 - b. As a result of that phone call, the host decided that he would "comp" HIGGINS a room at the Golden Nugget but required HIGGINS to put a \$1,000.00 cash deposit down with the hotel desk clerk upon his arrival. HIGGINS agreed with the arrangement.
 - c. HIGGINS later arrived to the Golden Nugget in the limousine accompanied by two females.
 - d. HIGGINS checked in to the hotel at the front desk and paid the required \$1,000.00 deposit in cash.

- e. Just after checking-in, the dispute about the limousine fare began. The host said that because of the commotion, security officers from the Golden Nugget were called and that they, in turn, called the ACPD.
- f. It appeared to the host that HIGGINS did not have enough cash to settle the disputed fare because he saw HIGGINS go back to the front desk, return his room key, and get back the cash he had left for the deposit. The host believed that is how HIGGINS paid the limousine driver.
- g. HIGGINS left the Golden Nugget on foot with the women. HIGGINS called and texted the host via HIGGINS' cellular phone number (571) 352-6722.

10. On December 15, 2016, I contacted the Bank Robbery Coordinator in the FBI's Baltimore Division to inquire if there were any similar unsolved robberies in Baltimore. The coordinator said he and the Baltimore Division's Violent Crimes Task force were investigating three robberies by a robber fitting the same physical description as HIGGINS:

- a. The December 10, 2016 robbery of Howard Bank, 821 West 36th Street, Baltimore, Maryland of \$660;
- b. The December 12, 2016 robbery of MOM's Organic Market, 711 West 40th Street, Baltimore, Maryland of \$299; and
- c. The December 13, 2016 robbery of Northwest Savings Bank, 1101 Maiden Choice Lane, Arbutus, Maryland of \$2,880.

11. On December 16, 2016, investigators went to the Econo Lodge, 3001 Pacific Avenue, Atlantic City, New Jersey in an effort to locate HIGGINS. The Econo Lodge's registry records indicated that HIGGINS had stayed there the nights of December 14 and 15, 2016 in rooms #228 and #208 respectively. HIGGINS was not at the motel.

12. While at the Econo Lodge, ACPD patrol officers were dispatched to the TD Bank, 15 North Pennsylvania Avenue, Atlantic City, New Jersey for a "hold-up" alarm. Officers responded to the TD Bank and immediately learned that a white male matching HIGGINS' description had walked into the bank. Bank personnel, who had previously received the OCPD "BOLO," recognized HIGGINS and activated their alarm which initiated the police response.
13. By the time officers arrived, HIGGINS had left the bank without speaking to anyone. The officers were told by witnesses that HIGGINS left the area of the bank in a taxi cab. A witness gave officers the cab number and the direction of the cabs' travel.
14. Another officer located the cab in the area of the Wells Fargo Bank, 1301 Atlantic Avenue, Atlantic City, New Jersey and found a woman sitting inside the cab, but not HIGGINS. While talking to the woman and attempting to locate HIGGINS, officers learned that the Wells Fargo Bank was being robbed. As HIGGINS exited the bank with approximately \$1,179 in cash in his hands, officers immediately arrested HIGGINS.
15. After telling officers that he was "sick" from his drug addiction, the officers transported HIGGINS to the AtlantiCare Hospital in Atlantic City for a medical evaluation. He was not admitted.
16. Investigators then responded to the Wells Fargo Bank and conducted witness interviews and reviewed the security camera recordings from robbery and learned the following:
 - a. At approximately 12:18 p.m., a white male, thereafter identified as HIGGINS, walked into the bank and presented the victim teller with a demand note which read: "Gun in Pocket, Money Now or Bang now."
 - b. The teller complied and gave HIGGINS approximately \$1,179 from the teller drawer. Included in that money was a security tracking device.

c. HIGGINS left the note on the counter and fled the bank on foot.

17. Investigators went to the AtlantiCare Hospital to interview HIGGINS. After being advised of his *Miranda* rights and waiving them, HIGGINS consented to a recorded interview. During the interview, HIGGINS admitted robbing the TD Bank in Ocean City on December 15, 2016 and the Wells Fargo Bank in Atlantic City on December 16, 2016. HIGGINS also admitted to committing the three robberies in Maryland described in paragraph 10 *infra*.

18. At the time of the two bank robberies charged in this Complaint, and at all times relevant to this affidavit, the deposits of the TD Bank and Wells Fargo Bank branches that HIGGINS robbed were insured by the Federal Deposit Insurance Corporation ("FDIC").