# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

Hon. Joseph A. Dickson

UNITED STATES OF AMERICA :

v.	: Mag. No. 17-6694
JOEL ROBBINS and WANDA SOEL	: Criminal Complaint
I, John Havens, being duly sworn, state the following is true and correct to the best of my knowledge and belief:	
SEE AT	TACHMENT 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 AT	TACHMENT B
continued on the attached page and made a part hereof.	
	Special Agent John Havens Federal Bureau of Investigation
Sworn to before me and subscribed in my presence, December 4, 2017 in Essex County, New Jersey	
Honorable Joseph A. Dickson United States Magistrate Judge	Signature of Judicial Officer

## ATTACHMENT A

### COUNT ONE

# (Bank Robbery)

On or about December 3, 2017, in Bergen County, in the District of New Jersey and elsewhere, the defendants,

# JOEL ROBBINS and WANDA SOEL

did knowingly, by force and violence, or by intimidation, take from the person and presence of another, namely employees of TD Bank, located in or around Mahwah, New Jersey, approximately \$10,665 in United States currency 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, Sections 2113(a) and 2.

#### ATTACHMENT B

- I, John Havens, am a Special Agent with the 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. Since 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 December 3, 2017, at approximately 12:51 p.m., an individual later identified as defendant Joel Robbins ("ROBBINS") walked into a TD Bank at 373 Route 17 North in Mahwah, New Jersey (the "Bank"). According to video surveillance footage, ROBBINS was wearing gray pants, a black jacket, sunglasses, a dark skull cap, and light-colored latex gloves. As ROBBINS entered the Bank, he pulled a bandana over his face.
- 2. At the same time, defendant Wanda Soel ("SOEL") was waiting for ROBBINS in a Toyota Corolla (the "Corolla") outside the Bank.
- 3. Once inside the Bank, according to video surveillance footage, ROBBINS pulled a black handgun (later determined to be fake) from his waistband and pointed it at two bank tellers. According to the bank tellers, ROBBINS demanded money from them and warned them not to "make me have to kill you." The tellers complied and handed ROBBINS approximately \$10,665 in U.S. currency. ROBBINS took the money and walked out of the Bank, dropping several bills as he departed.
- 4. Once outside, ROBBINS got into the passenger seat of the Corolla, and SOEL sped away. Nearby law enforcement, which had received a report of the Bank robbery while it was in progress, chased the Corolla. Unable to elude law enforcement, SOEL drove into the parking lot of a nearby hotel, where she and ROBBINS tried to switch places so ROBBINS could drive. When SOEL got out of the Corolla, she tripped and fell, and ROBBINS drove away without her. Law enforcement arrested SOEL in the hotel parking lot.
- 5. ROBBINS raced out of the hotel parking lot but eventually hit a curb, blew a tire, and crashed. Law enforcement quickly caught up to the Corolla and arrested ROBBINS. Law enforcement recovered U.S. currency sticking out of ROBBINS's pants and other cash bills strewn inside the Corolla, along with a fake black handgun. Law enforcement also recovered sunglasses, a bandana, a dark knit cap, and latex gloves from the Corolla, resembling the items ROBBINS was seen wearing when he robbed the Bank. ROBBINS was wearing a black jacket when he was arrested.

- 6. In post-arrest statements to law enforcement, both ROBBINS and SOEL confessed to their roles in the bank robbery described above.
- 7. At all times relevant to this Complaint, the deposits of the Bank identified above were insured by the Federal Deposit Insurance Corporation.