

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America )

v. )

Michael Terry Noojin, )

Case No. )

23-MJ-6395-AOV )

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 August 24, 2023 in the county of Broward in the Southern District of Florida, the defendant(s) violated:

Code Section	Offense Description
18 U.S.C. section 2113(a)	Bank Robbery

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

Complainant's signature

Adam Pascoe, FBI Special Agent

Printed name and title

Sworn to and subscribed before me telephonically.

Date: Aug 27, 2023

Judge's signature

Alicia O. Valle, United States Magistrate Judge

City and state: Fort Lauderdale, Florida

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your Affiant, Adam Pascoe, being duly sworn, deposes and states as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), currently assigned to the Violent Crimes and Fugitive Task Force of the FBI’s Miami Division and have served in this capacity since 2019. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant and make arrests. I received training on the proper investigative techniques for these violations, including the use of surveillance techniques, and the application and execution of arrests and search warrants. I have conducted and assisted in fugitive and violent crime investigations and have executed search warrants that have led to seizures of evidence related to violent crime. Prior to working as an FBI Special Agent, I was a police officer in Norfolk, Virginia, from 2012 to 2019.

2. This affidavit is submitted in support of a criminal complaint charging MICHAEL TERRY NOOJIN (“NOOJIN”) with bank robbery, in violation of Title 18, United States Code, Section 2113(a).

3. I respectfully submit there is probable cause to believe that on August 24, 2023, NOOJIN did attempt to knowingly take, by intimidation, from the person and presence of an employee of Bank Of America, located at 851 State-Road 7 North, Hollywood Florida, United States currency belonging to, and in the care custody, control, management, and possession of Bank Of America, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

4. The statements contained in this affidavit are based on my personal knowledge, as well as information relayed to me by other law enforcement officials and bank security personnel involved in this investigation. I have not included in this affidavit each and every fact known to me. Rather, I have included only the facts that are sufficient to establish probable cause for the issuance of a criminal complaint against NOOJIN for the above-described criminal violation.

**PROBABLE CAUSE**

5. On August 24, 2023, at approximately 2:42 p.m., a white male, later identified as MICHAEL TERRY NOOJIN (NOOJIN), entered the teller line of the Bank of America, located at 851 State-Road 7 North, Hollywood Florida. Bank Of America is insured by the Federal Deposit Insurance Corporation (FDIC).

6. NOOJIN, wearing a yellow polo shirt with sail boats and birds printed all over, blue-jeans, white shoes, and sunglasses, waited his turn in the teller line. NOOJIN approached the bank teller counter where two bank tellers were assisting one customer and one bank teller at station three, who was finishing up a previous transaction. The bank teller at station three mentioned to NOOJIN she would be with him in a moment. NOOJIN stood there and waited. The bank teller greeted NOOJIN when she was ready, asking for his debit card. NOOJIN replied “I have a gun, put all the money in the bag” as he was stuffing a brown plastic shopping bag under the protective glass towards the bank teller. NOOJIN repeated “I’m not playing around, I have a gun, put the money in the bag.” The bank teller at station three did not see a gun and began to lock her money drawer. The other two bank tellers sitting next to station three overheard NOOJIN’s demand and began to lock their money drawers and close their station. The bank teller at station two activated the emergency alarm. All three bank tellers, being in fear of the situation, began to walk away from the counter. NOOJIN realizing what was happening, grabbed the bag from under

the protective glass and departed the bank out of the emergency bank exit, traveling in an unknown direction.

7. The attempted bank robbery was recorded on Bank of America's security cameras. This footage captured NOOJIN as he entered the teller line and interacted with the victim teller.

8. In the late afternoon on August 24, 2023, a tipster who lived in the city of Hallandale Beach, contacted the Hallandale Beach Police Department identifying NOOJIN as the bank robbery suspect at the Bank of America in Hollywood earlier that same day. The tipster saw photographs of the bank robbery suspect on news reports. The tipster saw NOOJIN wearing the same clothes that were in the news reports that day. The tipster told police the address of the halfway house in Hallandale Beach where NOOJIN was living and was currently located.

9. In the early evening of August 24, 2023, law enforcement met with NOOJIN at the halfway house where he was living to interview him. In an audio recorded non-custodial interview, NOOJIN confessed to trying to rob the Bank of America in Hollywood Florida earlier that day.

10. NOOJIN identified the clothes he wore during the bank robbery. NOOJIN said the yellow polo shirt he wore at the time of the bank robbery was in his closet. He pointed out the location of the other items he wore in bank robbery, including his sunglasses and his white shoes. He said the plastic bag he told the victim teller to fill with money was still in his back pants pocket. NOOJIN took the plastic bag out of his back pocket. When law enforcement met with NOOJIN, he was wearing the blue jeans he had worn at the bank robbery. Additionally, he had a bandage on his face during the interview, which is consistent with the bank security photographs of him at the bank. NOOJIN said he wore the bandage on his cheek for skin cancer he had on his face.

11. The picture below is from Bank of America Security Camera system capturing NOOJIN at the bank counter at the time of the robbery with a bandage on his face, yellow polo shirt, and sunglasses.



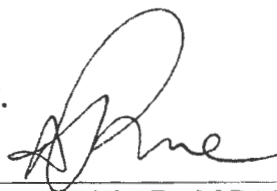
12. NOOJIN was shown two digital photographs taken of the bank robber from the Bank of America's surveillance system. NOOJIN immediately identified himself in the digital photographs.

13. NOOJIN explained his motive for conducting the bank robbery was that he was in desperate need for rent money. It was the last chance for him to obtain \$650.00 before he would be homeless.

**CONCLUSION**

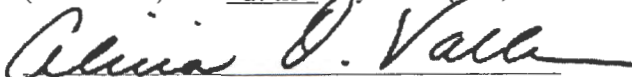
14. Based on my training and experience, and as further supported by the facts in this affidavit, I respectfully submit that probable cause exists to charge NOOJIN, with knowingly, by means of intimidation, attempting to take from the person and presence of an employee of a federally insured bank, United States currency belonging to, and in the care, custody, control, management, and possession of Bank of America, located at 851 State-Road 7 North, Hollywood Florida 33023, in violation of Title 18, United States Code, Sections 2113(a).

**FURTHER YOUR AFFIANT SAYETH NAUGHT.**



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SPECIAL AGENT ADAM PASCOE  
FEDERAL BUREAU OF INVESTIGATION

Subscribed and sworn before me telephonically  
(FaceTime) this 27th day of August, 2023.



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HONORABLE ALICIA O. VALLE  
UNITED STATES MAGISTRATE JUDGE