

United States District Court

SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA
V.
BRANDON BEASLEY

CRIMINAL COMPLAINT

CASE NUMBER: 07-8170-AEV

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 27, 2007 in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant(s) (Track Statutory Language of Offense)

did knowingly and by force, violence, and intimidation, take from the person and presence of employees of the Washington Mutual Bank located at 9863 Lake Worth Road, Lake Worth, Florida, approximately \$104,629, belonging to, and in the care, custody, control of said bank, whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing said offense did put in jeopardy the lives of persons by the use of a firearm and did knowingly and unlawfully conspire with others to do the same; and did knowingly use or brandish a firearm during and in relation to said bank robbery,

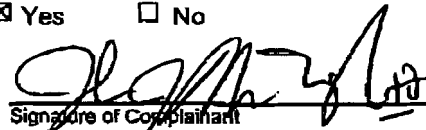
in violation of Title 18 United States Code, Section(s) 2113(a) and (d), 371, 924(c) and 2

I further state that I am a(n) Special Agent FBI and that this complaint is based on the following facts:

Please see attached Affidavit.

Continued on the attached sheet and made a part hereof:

Yes No




Signature of Complainant
John J. MacVeigh, IV, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

April 27, 2007
Date

at West Palm Beach, Florida
City and State

ANN E. VITUNAC
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

I, John J. MacVeigh, IV, being duly sworn, do state and attest as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since October 29, 1995. I am currently assigned to the Palm Beach County, Florida, resident agency of the FBI.
2. This affidavit is based on your affiant's personal investigation and on information from other law enforcement officers and witnesses. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not contain each and every detail about this investigation of which I am aware.
3. On 04-27-07 at approximately 10:13 A.M., the Washington Mutual Bank located at 9863 Lake Worth Road, Lake Worth in the Southern District of Florida reported an armed take over style bank robbery to the Palm Beach County Sheriff's Office (PBSO). The Washington Mutual Bank was determined to be insured with the Federal Deposit Insurance Corporation (FDIC).
4. The two armed robbers entered the bank through the front doors. The suspect (S1) approached the tellers and demanded to be let into the vault. The teller stated that S1 was dressed in an all black "Ninja" type costume. S1 pointed a small type semiautomatic assault rifle at the teller. The teller stated that S1 was a black male based on his manner of speech. S1 forced the teller to the vault and made the teller remove cash from the vault, which included the bank's bait bills with prerecorded serial numbers. The cash was put into a dark colored bag with hand straps that was carried by S1. The bank's video surveillance camera captured S1 entering the bank and removing cash from the vault area of the bank. It appeared that S1 had on dark

clothing.

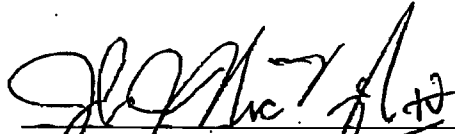
5. The other bank employees stated that one of the suspects (S2) entered the bank with S1, but stayed in the lobby area of the bank. S2 was carrying an assault type rifle. S2 ordered all the employees to get down on the ground. S2 was wearing all black clothing including a mask and dark colored gloves. S2 is seen in the bank's video surveillance camera holding the assault rifle in his right hand. S1 and S2 exited the bank. It was determined that approximately \$104,629.00 was stolen from the bank's vault.
6. A witness observed the suspects enter a blue Dodge Ram four door pickup type truck and flee the parking lot of the bank. The responding deputies located the truck in a nearby shopping center. Investigation revealed that the license plate was not registered to a Dodge Ram vehicle, but rather a BMW. A computer records search relating to the vehicle identification number of the Dodge Ram indicates that the Ram was previously reported stolen in Broward County, Florida.
7. Information was furnished to PBSO that the robbers had switched vehicles and were traveling south on Jog Road from Lake Worth Road in Palm Beach County, Florida. The responding deputies observed a four-door silver Hyundai bearing Florida license plate 896-HCD traveling south on Jog Road in the area LeChalet Blvd. The deputies observed two black males inside the vehicle. When PBSO deputies activated their emergency lights and siren to stop the Hyundai, the driver fled from the deputies. The Hyundai made an U-turn on Jog Road and attempted to travel north on Jog Road, when it collided with an unmovable object on the side of the road.

8. The deputies observed two black males exit the vehicle and run from the scene of the accident. One of the black males, who was later identified as BRANDON BEASLEY, date of birth, 06/21/1983, carried a dark colored bag and an assault rifle. The other black male, who was later identified as JOSHUA BEASLEY, date of birth, 05/06/1981, fled in a different direction.
9. The deputies attempted to stop JOSHUA BEASLEY twice with their marked PBSO vehicles. JOSHUA BEASLEY continued to run from the scene and was eventually stopped by the deputies after a foot chase. A deputy shot and killed JOSHUA BEASLEY after he resisted and began to fight with the deputy.
10. The deputies chased BRANDON BEASLEY on foot as he carried the black bag and assault rifle. When a deputy attempted to stop BEASLEY, BEASLEY turned toward the deputy with the assault rifle. The deputy fired at BEASLEY and struck him in the torso.
11. A search of the black bag revealed a black Tech-9 assault type rifle and a large amount of cash. The Washington Mutual Bank prerecorded bait bill list was compared to the cash discovered inside the black bag, All four prerecorded bait bills taken from the bank during the robbery were present in the black bag.
12. BRANDON BEASLEY was transported to the hospital with a gun shot wound. The doctors notified the agents that BEASLEY's injuries are not life threatening and he is conscious and coherent. BEASLEY provided a post-Miranda statement admitting his involvement in the Washington Mutual bank robbery along with another bank robbery which was committed on February 7, 2007, at another Washington Mutual

Bank in Broward County, Florida.

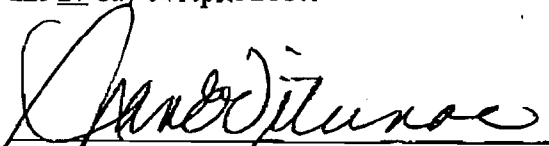
13. Based upon the above facts and investigation, your affiant believes that probable cause exists to charge BRANDON BEASLEY with armed bank robbery, conspiracy to commit armed bank robbery, and possession of a firearm during the commission of a federal crime of violence, in violation of 18 U.S.C. §§ 2113 (a) and (d), 371, 924(c) and 2.

FURTHER YOUR AFFIANT SAYETH NAUGHT



JOHN J. MACVEIGH, IV, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Sworn to and subscribed before me
this 27 day of April 2007.



ANN E. VITUNAC
UNITED STATES MAGISTRATE JUDGE