
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
 :
 v. : HON. LOIS H. GOODMAN
 :
 DAYSHAWN BRIMFIELD : Mag. No. 21-5036 (LHG)

I, Silvana Sotillo, being duly sworn, state that 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 pages and made a part hereof.

s/ Silvana Sotillo
Silvana Sotillo, Special Agent
Federal Bureau of Investigation

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A) on December 15, 2021,
in the District of New Jersey

HONORABLE LOIS H. GOODMAN
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Bank Robbery)

On or about April 2, 2021, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

DAYSHAWN BRIMFIELD,

did, by force, violence, and intimidation, knowingly take from the person and presence of others, namely, employees of Bank 1, located in or around Hazlet, New Jersey, money belonging to, and in the care, custody, control, management, and possession of 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).

COUNT TWO

(Hobbs Act Robbery)

On or about April 20, 2021, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

DAYSHAWN BRIMFIELD,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce, by robbery, and committed or threatened physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a).

COUNT THREE
(Hobbs Act Robbery)

On or about April 22, 2021, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

DAYSHAWN BRIMFIELD,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce, by robbery, and committed or threatened physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

(Using and Carrying a Firearm During and in Relation to a Crime of Violence)

On or about April 22, 2021, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

DAYSHAWN BRIMFIELD,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, Hobbs Act robbery, as charged in Count Three of this criminal complaint, did knowingly use and carry a firearm, which was brandished.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FIVE

(Interstate Transportation of Stolen Property)

Between on or about April 20, 2021 and April 25, 2021, in Monmouth County and in Middlesex County, in the District of New Jersey, in Lancaster County, in the District of Nebraska, and elsewhere, the defendant,

DAYSHAWN BRIMFIELD,

did unlawfully transport in interstate commerce, a stolen motor vehicle, that is, a 1998 Honda Civic, Vehicle Identification Number 1HGEJ6220WL084799, from the State of New Jersey to the State of Nebraska, knowing the same to be stolen.

In violation of Title 18, United States Code, Section 2312.

ATTACHMENT B

I, Silvana Sotillo, am a Special Agent with the Federal Bureau of Investigation. 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 other items of evidence. Where statements of others are related herein, they are related in substance and in 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. Law enforcement has investigated a series of armed convenience store robberies, a bank robbery, and a car theft that occurred between in or around April 2, 2021 and in or around April 25, 2021. The investigation identified defendant Dayshawn Brimfield (“BRIMFIELD”) as the perpetrator of each of these robberies. As set forth below, BRIMFIELD took money from a bank and two convenience stores while threatening the use of or brandishing a handgun before fleeing to Nebraska in a stolen motor vehicle.

April 2, 2021 – Bank 1, Hazlet, New Jersey

2. On or about April 2, 2021, at approximately 2:20 p.m., a man later identified as defendant Dayshawn Brimfield (“BRIMFIELD”) entered Bank 1 in Hazlet, New Jersey, and handed a note to Victim 1, a teller at the bank. BRIMFIELD was wearing all black clothing and a mask over his face. BRIMFIELD told Victim 1 that he (BRIMFIELD) had something to tell Victim 1 and handed Victim 1 a note. The note stated that this was a robbery, that BRIMFIELD had a gun, threatened to kill Victim 1, and demanded untraceable money. Victim 1 handed \$500 to BRIMFIELD who then demanded more. Victim 1 then handed BRIMFIELD another \$250, which BRIMFIELD took before fleeing the bank on foot.

3. Law enforcement seized the note from the counter where Victim 1 had placed it. A law enforcement laboratory analyzed the note and recovered a latent palm print. Law enforcement entered the palm print into a government database that identified BRIMFIELD as a potential match. The laboratory compared the latent palm print to a known palm print of BRIMFIELD and positively identified the latent print as belonging to BRIMFIELD.

April 20, 2021 – Convenience Store 1, Aberdeen, New Jersey

4. On or about April 20, 2021, at approximately 3:00 a.m., BRIMFIELD entered Convenience Store 1 in Aberdeen, New Jersey, wearing black boots, black pants, and a black jacket. BRIMFIELD grabbed a soda bottle, and placed the soda on the counter. BRIMFIELD then walked around

the counter, showed a gun to Victim 2, a cashier employed by Convenience Store 1, and told Victim 2 to sit on the floor. BRIMFIELD then took cash from the cash registers and left the store. Victim 2 saw BRIMFIELD drive away in a green Honda Civic. BRIMFIELD took approximately \$450 from the registers.

5. Following the robbery, law enforcement reviewed security camera footage of the incident. During the robbery, security cameras captured the robber, later identified as BRIMFIELD, with what appeared to be a black, semi-automatic handgun in his hand. Law enforcement was able to identify BRIMFIELD from the uncovered portion of his face surrounding his eyes. BRIMFIELD was wearing a black jacket with a tag on the front left pocket consistent with the Carhartt brand. Additionally, security cameras in the shopping plaza captured an older-model green Honda Civic coupe park outside of Convenience Store 1 immediately prior to the robbery.

April 22, 2021 – Convenience Store 2, South Plainfield, New Jersey

6. On April 22, 2021, shortly before 10:00 p.m., BRIMFIELD entered Convenience Store 2 in South Plainfield, New Jersey. Victim 3, a cashier employed by Convenience Store 2, was preparing to close the store when BRIMFIELD walked behind the counter and pointed a handgun at Victim 3. BRIMFIELD ordered Victim 3 to give him Victim 3's wallet and cellular telephone. Victim 3 complied, and BRIMFIELD ordered Victim 3 to lay down on the ground. BRIMFIELD then took all of the money out of the cash registers. BRIMFIELD took a box that was used to store cash and Victim 3's wallet, left the store, and threw Victim 3's cellular telephone on the ground as he left. The wallet contained Victim 3's driver's license, social security card, and approximately \$450. BRIMFIELD took more than \$2,000 from Convenience Store 2.

7. Following the robbery, law enforcement reviewed security camera footage of the incident, which captured a man dressed in all dark clothing and wearing a mask, later identified as BRIMFIELD, approach Victim 3 behind the store counter. BRIMFIELD was wearing a black Carhartt jacket with light-colored stains on the right hand side. BRIMFIELD pointed what appeared to be a handgun at Victim 3, who got down on the ground. BRIMFIELD appeared to be holding a handgun and cellular telephone in his right hand as he took cash from the registers. BRIMFIELD then left the store and walked in the direction of a neighboring bank.

8. Law enforcement also reviewed security video footage from a bank immediately adjacent to Convenience Store 2 during the time of the robbery. Immediately before the robbery, BRIMFIELD was captured on video operating a green Honda Civic coupe with license plate number HS7601 (the "Honda") in the parking lot of the bank. BRIMFIELD parked the Honda in front of an ATM with a security camera for approximately three minutes. During that time,

BRIMFIELD's shoulders and head were visible. He was wearing a dark-colored hooded sweatshirt and a knit New England Patriots hat. He also wore a light-colored mask that covered his mouth and chin. Law enforcement was able to identify BRIMFIELD from the portions of his face that were visible, including his nose and eyes. BRIMFIELD moved around in the driver's seat and could be seen pulling the straps of what appeared to be overalls over his shoulders before moving the car out of camera range.

9. On April 19, 2021, the registered owner of the Honda had reported to law enforcement that the vehicle was stolen sometime between April 17, 2021 and April 18, 2021, in Elizabeth, New Jersey. The owner reported that she retained possession of all of the keys to the Honda.

April 25, 2021 – Recovery of the Honda in Lancaster County, Nebraska

10. On April 25, 2021, law enforcement arrested BRIMFIELD after a five-mile pursuit on Interstate 80 in Lancaster County, Nebraska. During the pursuit, BRIMFIELD attempted to flee from law enforcement in the Honda. Law enforcement arrested BRIMFIELD after he drove the Honda into a fence on the side of the highway.

11. On April 29, 2021, law enforcement executed a search warrant on the Honda. The steering column of the Honda was broken open and covered with facial masks. Law enforcement recovered a flat head screwdriver from the floor between the driver's seat and the door. The condition of the steering column and presence of the screwdriver are indicative of the operation of a stolen vehicle without the key. Law enforcement recovered the driver's license and social security card taken from Victim 3 by BRIMFIELD during the robbery of Convenience Store 2. Law enforcement also recovered a black Carhartt jacket with light-colored staining on the right-hand side, consistent with what BRIMFIELD wore during the robberies of Convenience Store 1 and Convenience Store 2, a knit New England Patriots hat consistent with the hat BRIMFIELD was wearing in the bank security video immediately prior to robbery of Convenience Store 2, overalls consistent with what BRIMFIELD wore during the robberies of Convenience Store 1 and Convenience Store 2, and one round of nine millimeter ammunition with a head stamp that read, "Luger Speer 9mm."

12. On May 4, 2021, law enforcement searched the location where BRIMFIELD crashed the Honda into a fence and recovered a nine millimeter, semiautomatic Taurus handgun from the ground within approximately ten feet of where BRIMFIELD had crashed. Upon further examination of the firearm, the exterior serial number had been obliterated and it was loaded with one round of ammunition in the chamber. The round of ammunition bore the head stamp "Luger Speer 9mm."