



**ATTACHMENT A**

**Count One**

(Possession of Ammunition by a Convicted Felon)

On or about May 23, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**SHAMIR BLUNT,**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition in and affecting commerce, namely, at least four rounds of 9-millimeter ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**Count Two**

(Possession of Ammunition by a Convicted Felon)

On or about May 23, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**MARK FRANKLIN,**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition in and affecting commerce, namely, at least nine rounds of 9-millimeter ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

## **ATTACHMENT B**

I, David Scanlon, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives. 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, photographs, and videos of the evidence. Where statements of others are related herein, they are related in substance and 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. In the early morning hours of May 23, 2021, Shamir Blunt was standing on the sidewalk in front of a bodega on Newark Avenue in the Grove Street area of Jersey City, New Jersey. He was wearing a Yankees baseball cap, and his left hand appeared heavily bandaged from an apparent injury. Video cameras in the area captured Blunt before and during the events described below.

2. As Blunt stood on the sidewalk on Newark Avenue, Mark Franklin drove up in a black Chrysler 300 and parked across the street. Franklin rolled down his window and started speaking with Blunt, but the conversation quickly appeared to turn into an argument. Franklin then got out of his car to confront Blunt. Before he did, he grabbed a gun from the center console and put it in the pocket of his hooded sweatshirt.

3. Franklin then crossed the street and his argument with Blunt appeared to grow more heated. Eventually, Blunt walked a few steps to the bodega and opened the door. Franklin followed.

4. As Blunt was entering the bodega, Franklin punched him in the face several times as the fight spilled inside. The two struggled for approximately ten seconds when Franklin pulled the gun out of his hoodie and fired a shot. It is not clear whether the shot hit Blunt, but police later recovered a spent 9-millimeter shell casing from Franklin's gun inside the bodega. Franklin then quickly left and put the gun back inside his hoodie.

5. Blunt gathered himself for a moment inside the bodega. The wrap on his left hand had mostly unspooled and was hanging from his hand, and his Yankees baseball cap had fallen to the floor. Blunt then pulled his own gun and pursued Franklin.

6. By that time, Franklin was crossing Newark Avenue toward his parked car. Four bystanders walked by. Emerging from the bodega, Blunt ran at Franklin with his arm extended and shot Franklin twice from close range. Franklin immediately fell to the ground but was still conscious, and he pulled

his gun and returned fire. The bystanders scattered as the two men exchanged gun fire from across the street. Franklin crawled toward his car and continued to shoot at Blunt while seated in the street. Blunt fired back from behind parked cars.

7. Franklin and Blunt shot at each other over 15 times, and both men were hit. They eventually got in their cars, sped away, and went to Jersey City Medical Center where police later found each of their cars parked outside. Police also collected their clothing from the hospital, which matched the clothing they were wearing during the fight.

8. Police also later found at least nine 9-millimeter shell casings from Franklin's gun and at least four 9-millimeter shell casings from Blunt's gun. They also found several bullets lodged in parked cars and in windows of nearby businesses.

9. All of the recovered ammunition was manufactured outside the State of New Jersey, and thus necessarily traveled in interstate commerce prior to May 23, 2021.

10. On or about February 14, 2014, Blunt was convicted in Hudson County Superior Court of first-degree robbery, in violation of N.J.S.A. 2C:15-1, a crime punishable by imprisonment for a term exceeding one year.

11. On or about September 13, 2019, Franklin was convicted in Hudson County Superior Court of unlawful weapons possession, in violation of N.J.S.A. 2C:39-5B(1), a crime punishable by imprisonment for a term exceeding one year.