
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Mag. No. 24-16148
 :
 ROBERT FRANKLIN, : **FILED UNDER SEAL**
 a/k/a “Choppa” :

I, Laejon Brooks, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

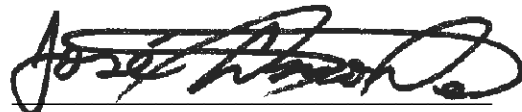
I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

Laejon Brooks, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Special Agent Brooks attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 10th day of June, 2024.



Honorable José R. Almonte
United States Magistrate Judge

ATTACHMENT A

**Count One
(Possession of Ammunition by a Convicted Felon)**

On or about March 19, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**ROBERT FRANKLIN,
a/k/a “Choppa,”**

knowing that he had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess 16 rounds of 9mm ammunition, and the ammunition was in and affecting interstate commerce.

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

Count Two
(Distribution and Possession with Intent to Distribute Cocaine)

On or about March 19, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

ROBERT FRANKLIN,
a/k/a “Choppa,”

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

Count Three
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about March 19, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant

ROBERT FRANKLIN,
a/k/a “Choppa,”

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, distribution and possession with intent to distribute cocaine, as charged in Count Two of this Criminal Complaint, did knowingly possess a firearm, namely, a 9mm privately manufactured firearm, loaded with 16 rounds of 9mm ammunition.

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

ATTACHMENT B

I, Laejon Brooks, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). 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, video footage, and photographs of the 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. Since in or around July 2023, law enforcement has been conducting an investigation into a drug trafficking organization (the “DTO”) that operates an open-air narcotics market in and around the area of South Orange Avenue and Isabella Avenue in Newark, New Jersey (“Isabella Avenue”). The investigation has shown that Robert Franklin (“FRANKLIN”) is a member of the DTO. Through various investigative techniques, including physical and fixed surveillance and the use of confidential sources, the investigation has shown that the DTO is affiliated with a neighborhood-based street gang known as the 793 Bloods, which is subset of the Bloods national street gang. The investigation has further revealed that members and associates of the DTO control the sale of fentanyl, heroin, and cocaine base in and around Isabella Avenue, working together to sell drugs and protect the area from rival drug dealers and rival neighborhood street gangs, including through the possession of firearms.

2. On or about March 19, 2024, in the vicinity of Isabella Avenue, law enforcement observed FRANKLIN engage in a suspected hand-to-hand drug transaction with a buyer. Law enforcement observed FRANKLIN removing suspected drugs from a pill bottle and handing the drugs to an unknown woman in exchange for cash. Minutes later, law enforcement observed FRANKLIN remove a suspected firearm from his waistband and hand it to an individual known to law enforcement (“Individual-1”). Soon thereafter, law enforcement observed Individual-1 hand the suspected firearm back to FRANKLIN. Based on these observations, law enforcement approached and searched FRANKLIN. During the search, law enforcement seized a black in color privately-manufactured firearm, equipped with a high-capacity magazine (the “Firearm”), loaded with 16 rounds of 9mm ammunition (the “Ammunition,” and collectively with the Firearm, the “Firearm and Ammunition”). During the search of FRANKLIN, law enforcement also seized a pill bottle containing approximately 9 plastic jugs containing suspected cocaine base.

3. The Ammunition was manufactured outside the State of New Jersey and thus necessarily traveled in and affected interstate or foreign commerce prior to FRANKLIN’s possession on or about March 19, 2024.

4. On or about December 9, 2015, FRANKLIN was convicted of Robbery in the Superior Court of New Jersey, Essex County, in violation of N.J.S.A. 2C:15-1, a crime punishable by a term of imprisonment exceeding one year, for which FRANKLIN was sentenced to a term of imprisonment of five years.