

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

DYLAN IANNCCELLI

Crim. No.

18 U.S.C. § 371

18 U.S.C. § 922(g)(1)

INFORMATION

The defendant, having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE  
(Conspiracy)

Between on or about August 2, 2021 and on or about August 13, 2021, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

DYLAN IANNCCELLI,

knowingly and intentionally conspired and agreed with Jessy Hill, and others, to commit certain offenses, namely:

a. to engage in the business of dealing in firearms and in the course of such business to ship and transport firearms in interstate commerce, while not being federally-licensed dealers, importers, or manufacturers of firearms, contrary to Title 18, United States Code, Section 922(a)(1)(A); and

b. in connection with the acquisition of firearms from a licensed dealer of firearms, within the meaning of Chapter 44 of Title 18, United States Code, to knowingly make false and fictitious oral and written statements that were intended and likely to deceive the licensed dealer with respect to a fact material to the lawfulness of the sale of a firearm and ammunition under

Chapter 44 of Title 18, United States Code, contrary to Title 18, United States Code, Section 922(a)(6).

Overt Acts

In furtherance of this conspiracy and to effect its objects, the following overt act was committed in the District of New Jersey and elsewhere:

1. On or about August 13, 2021, defendant DYLAN IANNCCELLI and Jessy Hill drove a car containing approximately twelve firearms from Georgia to Mantua, New Jersey.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

(Unlawful Possession of a Firearm by a Previously Convicted Felon)

On or about August 13, 2021, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

DYLAN IANNCCELLI,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess the following firearms and ammunition, and the firearms and ammunition were in and affecting commerce:

1. SCCY model CPX1 pistol bearing obliterated serial number C024896;
2. SCCY model CPX1 pistol bearing serial number C195210;
3. SCCY model CPX1 pistol bearing serial number C195307;
4. SCCY model CPX2 pistol bearing serial number C198044;
5. SCCY model CPX2 pistol bearing serial number C198003;
6. SCCY model CPX2 pistol bearing serial number C197998;
7. SCCY model CPX2 pistol bearing serial number C197997;
8. SCCY model CPX2 pistol bearing serial number C198015;
9. SCCY model CPX2 pistol bearing serial number C198036;
10. SCCY model CPX2 pistol bearing serial number C198043;
11. Kel Tec model Pf-9 pistol bearing serial number RQQ60;
12. Taurus model 740 pistol bearing serial number SHU98931; and
13. Approximately 43 rounds of 9 mm ammunition.

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

## FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby re-alleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 371 and 922(g)(1), set forth in this Information, the defendant,

DYLAN IANNCCELLI,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of the offense, including, but not limited to:

1. SCCY model CPX1 pistol bearing obliterated serial number C024896;
2. SCCY model CPX1 pistol bearing serial number C195210;
3. SCCY model CPX1 pistol bearing serial number C195307;
4. SCCY model CPX2 pistol bearing serial number C198044;
5. SCCY model CPX2 pistol bearing serial number C198003;
6. SCCY model CPX2 pistol bearing serial number C197998;
7. SCCY model CPX2 pistol bearing serial number C197997;
8. SCCY model CPX2 pistol bearing serial number C198015;
9. SCCY model CPX2 pistol bearing serial number C198036;
10. SCCY model CPX2 pistol bearing serial number C198043;
11. Kel Tec model Pf-9 pistol bearing serial number RQQ60;
12. Taurus model 740 pistol bearing serial number SHU98931; and
13. Approximately 43 rounds of 9 mm ammunition.

## SUBSTITUTE ASSETS PROVISION

3. If any of the above forfeitable property, as a result of any act or omission or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;

- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above described forfeitable property.

Handwritten signature of Philip R. Sellinger in cursive, with the initials "b7A" written to the right of the signature.

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PHILIP R. SELLINGER  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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

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**DYLAN IANNCELLI**

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**INFORMATION FOR**

**18 U.S.C. § 371  
18 U.S.C. § 922(g)(1)**

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**PHILIP R. SELLINGER**

*U.S. ATTORNEY  
NEWARK, NEW JERSEY*

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**JEFFREY BENDER**

*ASSISTANT U.S. ATTORNEY  
CAMDEN, NEW JERSEY  
856-757-5121*

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