
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. : Mag. No. 19-7522

MARIO GALLI III and :
JASON VELLA :

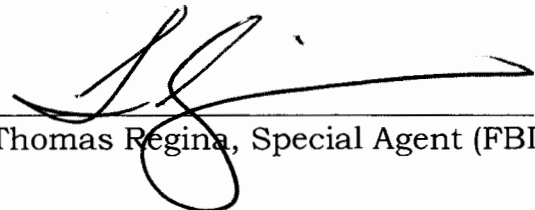
I, Thomas Regina, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation (FBI), and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.


Thomas Regina, Special Agent (FBI)

Sworn to before me and subscribed in my presence, on this 9 day of December, 2019, in Newark, New Jersey.


HONORABLE CATHY L. WALDOR
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Possession With Intent to Distribute Cocaine)

On or about September 19, 2019, in Ocean County, in the District of New Jersey, and elsewhere, the defendants,

MARIO GALLI III and
JASON VELLA,

did knowingly and intentionally possess with intent to distribute 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 841(b)(1)(C).

COUNT TWO

(Possession of a Firearm by a Convicted Felon)

On or about September 19, 2019, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

MARIO GALLI III,

knowing he had previously been convicted in a court of the United States of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm and ammunition, namely, a FEG 9mm Model #PGK-9HP, Serial #B89098 gun, which was loaded with twelve rounds of ammunition.

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

COUNT THREE

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

On or about September 19, 2019, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

MARIO GALLI III,

in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely possession with intent to distribute cocaine, as set forth in Count One, did knowingly possess a firearm and ammunition, namely, a FEG 9mm Model #PGK-9HP, Serial #B89098 gun, which was loaded with twelve rounds of ammunition.

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

ATTACHMENT B

I, Thomas Regina, Special Agent of FBI, with regard to the present matter of Jason Vella and Mario Galli III, I am fully familiar with the facts and circumstances set forth herein, based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence gathered. 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.

Probable Cause

1. On or about August 9, 2016, defendant MARIO GALLI III ("GALLI") was convicted in U.S. District Court for the District of New Jersey, of conspiracy to distribute 500 grams or more of cocaine, in violation of 21, United States Code Section 846, a crime punishable by imprisonment for a term exceeding one year.

2. On or about September 19, 2019, supported by probable cause regarding the drug activity of JASON VELLA ("VELLA"), a court authorized search warrant, issued by Honorable Guy P. Ryan, was executed at the VELLA residence in Toms River, New Jersey (the "Vella Residence"). At the time of the execution of the warrant, defendant MARIO GALLI III was present at the VELLA residence. Among the items seized were a ziplock bag containing approximately 150 grams of powder. A sample was field tested and tested positive for cocaine. In addition to the aforementioned alleged cocaine, among the other items seized are the following:

- a digital scale;
- small plastic bags with white powder;
- container with baking soda
- numerous clear glassine envelopes; and
- \$2295 in U.S. Currency.

3. Based upon further investigation, a search warrant was issued by the Honorable Guy P. Ryan, on or about September 19, 2019, for MARIO GALLI III's residence (the "Galli Residence") in Toms River, New Jersey.

4. As a result of the search at the Galli Residence, among the items seized in the kitchen were the following:

- a digital scale;
- a money counter;
- several bags with white rock powder;
- two Cuisinart (ph) grinders with power residue;
- numerous empty clear glassine baggies;
- Foodsaver pressurized sealing machine; and
- a FEG 9mm Model #PGK-9HP, Serial #B89098 gun, which was loaded with twelve rounds of ammunition.

5. Based on my knowledge of and experience with firearms and ammunition, I have reason to believe that the FEG 9mm Model #PGK-9HP, Serial #B89098 gun, which was loaded with twelve rounds of ammunition, referenced above, is in fact a firearm that was manufactured outside the State of New Jersey, and that this firearm therefore traveled in interstate commerce prior to September 19, 2019.