

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	No. _____
)	
Plaintiff,)	COUNT ONE: (Conspiracy)
)	21 U.S.C. §§ 841(a)(1),
v.)	841(b)(1)(A)(viii), 846
)	NMT Life Imprisonment
PETER J. LOMBARDO,)	NLT Ten Years Imprisonment
[DOB: 09/██/1965],)	NMT \$10,000,000 Fine
)	NLT 5 Years Supervised Release
DANNY SANCHEZ,)	Class A Felony
[DOB: 05/██/1982],)	
)	COUNTS TWO-FIVE, EIGHT-TEN
TONY P. CASTRO,)	(Distribution of Methamphetamine)
[DOB: 08/██/1977], and)	21 U.S.C. §§ 841(a)(1),
)	841(b)(1)(C) [18 USC § 2 in COUNTS
CARL E. EDMUNDS,)	THREE, EIGHT and NINE]
[DOB: 02/██/1982],)	NMT 20 Years Imprisonment
)	NMT \$1,000,000 Fine
)	NLT 3 Years Supervised Release
Defendants.)	Class C Felony
)	
)	COUNT SIX: (Firearms)
)	18 U.S.C. § 924(c)(1)(A)(i)
)	NLT Five Years Imprisonment (consec.)
)	NMT \$250,00 Fine
)	NMT 3 Years Supervised Release
)	Class C Felony
)	
)	COUNT SEVEN: (Firearms)
)	18 U.S.C. §§ 922(g)(1) and 924(a)(2)
)	NMT Ten Years
)	NMT \$250,000 Fine
)	NMT 3 Years Supervised Release
)	Class C Felony

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about January 1, 2011, and July 5, 2011, in Jackson and Benton Counties, in the Western District of Missouri, PETER J. LOMBARDO, DANNY SANCHEZ, TONY P. CASTRO and CARL E. EDMUNDS, defendants herein, did knowingly and unlawfully conspire, confederate, and agree with each other and with others unknown to the Grand Jury, to distribute five-hundred (500) grams and more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) 841(b)(1)(A)(viii), and 846.

Overt Acts

Counts Two through Ten of this Indictment are fully incorporated herein as overt acts committed in furtherance of the conspiracy charged in Count One.

COUNT TWO

On or about April 14, 2011, in Jackson County, in the Western District of Missouri, PETER J. LOMBARDO, defendant herein, did knowingly and intentionally distribute some amount of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

On or about April 21, 2011, in Jackson County, in the Western District of Missouri, PETER J. LOMBARDO and TONY P. CASTRO, defendants herein, aiding and abetting each other, did knowingly and intentionally distribute some amount of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in

violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18 United States Code, Section 2.

COUNT FOUR

On or about May 5, 2011, in Jackson County, in the Western District of Missouri, PETER J. LOMBARDO, defendant herein, did knowingly and intentionally distribute some amount of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

On or about May 11, 2011, in Benton County, in the Western District of Missouri, PETER J. LOMBARDO, defendant herein, did knowingly and intentionally possess, with intent to distribute, some amount of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

On or about May 11, 2011, in Benton County, in the Western District of Missouri, PETER J. LOMBARDO, defendant herein, did, during and in relation to the drug-trafficking offenses alleged in Counts One and Five of this Indictment, carry firearms, to wit: a Charter Arms, .38 caliber revolver, Serial Number 1010513, and a Kel-Tec 9mm semi-automatic pistol, Serial Number AFG74, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SEVEN

On or about May 11, 2011, in Benton County, in the Western District of Missouri, PETER J. LOMBARDO, defendant herein, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce firearms, to wit: a Charter Arms, .38 caliber revolver, Serial Number 1010513, and a Kel-Tec 9mm semi-automatic pistol, Serial Number AFG 74, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT EIGHT

On or about May 19, 2011, in Jackson County, in the Western District of Missouri, DANNY SANCHEZ and **TONY P. CASTRO**, defendants herein, aiding and abetting each other, did knowingly and intentionally distribute some amount of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2..

COUNT NINE

On or about June 8, 2011, in Jackson County, in the Western District of Missouri, DANNY SANCHEZ, **TONY P. CASTRO**, and CARL E. EDMUNDS, defendants herein, aiding and abetting each other, did knowingly and intentionally distribute some amount of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, united States Code, Section 2.

COUNT TEN

On or about July 5, 2011, in Jackson County, in the Western District of Missouri, DANNY SANCHEZ, defendant herein, did knowingly and intentionally distribute some amount of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

A TRUE BILL:

/s/ Lawrence E. Johnson
FOREPERSON OF THE GRAND JURY

/s/ Charles E. Ambrose, Jr.
Charles E. Ambrose, Jr.
Assistant United States Attorney

Dated: 7/13/11
Kansas City, Missouri