

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM E. TOOMBS, JR.,
a/k/a Zorro,
a/k/a Big Z,
[DOB: 06/02/1958]

Defendant.

Case No. _____

**COUNTS ONE and TWO, and
SIX through EIGHT:**

*(Possession of Controlled Substances with
Intent to Distribute)*

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NMT: 20 Years Imprisonment

NMT: \$1,000,000 Fine

NLT: 3 Years Supervised Release

Class C Felony

COUNTS THREE and NINE:

*(Possession of Controlled Substances With
Intent to Distribute)*

21 U.S.C. §§ 841(a)(1) and (b)(1)(E)(i)

NMT: 10 Years Imprisonment

NMT: \$500,000 Fine

NLT: 3 Years Supervised Release

Class C Felony

COUNTS FOUR and TEN:

*(Possession of Controlled Substances With
Intent to Distribute)*

21 U.S.C. §§ 841(a)(1) and (b)(2)

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NLT: 3 Years Supervised Release

Class C Felony

COUNT FIVE:

(Felon in Possession of a Firearm)

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

\$100 Mandatory Special Assessment Each
Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Possession of Controlled Substances with Intent to Distribute)

On or about June 19, 2015, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TWO

(Possession of Controlled Substances with Intent to Distribute)

On or about June 19, 2015, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Oxycodone and Morphine, all Schedule II controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

(Possession of Controlled Substances with Intent to Distribute)

On or about June 19, 2015, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Hydrocodone and Codeine, all Schedule III controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(E)(i).

COUNT FOUR

(Possession of Controlled Substances with Intent to Distribute)

On or about June 19, 2015, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Alprazolam and Diazepam, all Schedule IV controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(2).

COUNT FIVE

(Felon in Possession of a Firearm)

On or about June 19, 2015, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Taurus, Model "The Judge," .45 Long Colt/410 gauge revolver, bearing Serial Number EX505413, which had been transported in interstate commerce, contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SIX

(Possession of Controlled Substances with Intent to Distribute)

On or about April 25, 2016, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute, a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SEVEN

(Possession of Controlled Substances with Intent to Distribute)

On or about May 4, 2016, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute, a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT EIGHT

(Possession of Controlled Substances with Intent to Distribute)

On or about May 4, 2016, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Oxycodone and Methadone, all Schedule II controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT NINE

(Possession of Controlled Substances with Intent to Distribute)

On or about May 4, 2016, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Hydrocodone, a Schedule III controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(E)(i).

COUNT TEN

(Possession of Controlled Substances with Intent to Distribute)

On or about May 4, 2016, in the Western District of Missouri, the defendant, WILLIAM E. TOOMBS, Jr., a/k/a Zorro, a/k/a Big Z, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Alprazolam, a Schedule IV

controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(2).

A TRUE BILL.

6/29/17
DATE

FOREPERSON OF THE GRAND JURY

/s/ William A. Alford III
William A. Alford, III
Assistant United States Attorney
Narcotics & Violent Crimes Unit
Western District of Missouri