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Judge Matthew F. Kennelly
Magistrate Judge Gabriel A. Fuentes
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

No.

v.

ADRIAN ANDRES ROMERO-SANCHEZ,
MIGUEL ALEJANDRO CASTILLO-
CEBALLOS, and
DAVID ANDRES HERMOSO-MAYOR

Violations: Title 21, United States
Code, Sections 841(a)(1) and 846;
and Title 18, United States Code,
Sections 371 and 922(a)(1)(A)

UNDER SEAL

COUNT ONE

The SPECIAL JUNE 2024 GRAND JURY charges:

On or about May 27, 2025, at Chicago, in the Northern District of Illinois,
Eastern Division,

ADRIAN ANDRES ROMERO-SANCHEZ, and
MIGUEL ALEJANDRO CASTILLO-CEBALLOS,

defendants herein, did conspire with each other, and with others known and unknown
to the Grand Jury, to knowingly and intentionally possess with intent to distribute
and distribute a controlled substance, namely, a mixture and substance containing a
detectable amount of ketamine, a Schedule III Controlled Substance, and
methylenedioxymethamphetamine (MDMA), a Schedule I Controlled Substance, in
violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

COUNT TWO

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about May 27, 2025, at Chicago, in the Northern District of Illinois,
Eastern Division,

ADRIAN ANDRES ROMERO-SANCHEZ, and
MIGUEL ALEJANDRO CASTILLO-CEBALLOS,

defendants herein, did knowingly and intentionally distribute a controlled substance,
namely, a mixture and substance containing a detectable amount of ketamine, a
Schedule III Controlled Substance, and methylenedioxymethamphetamine (MDMA),
a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. At all times material to this indictment:

a. Federal law required that a firearms dealer engaged in the business of dealing in firearms be licensed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”); and

b. ADRIAN ANDRES ROMERO-SANCHEZ, MIGUEL ALEJANDRO CASTILLO-CEBALLOS, and DAVID ANDRES HERMOSO-MAYOR did not possess ATF licenses to engage in the business of dealing in firearms;

2. Beginning on or about May 28, 2025, and continuing until the present, at Chicago, in the Northern District of Illinois, Eastern Division,

ADRIAN ANDRES ROMERO-SANCHEZ,
MIGUEL ALEJANDRO CASTILLO-CEBALLOS, and
DAVID ANDRES HERMOSO-MAYOR

defendants herein, did conspire with each other and others known and unknown to the grand jury to, without being a licensed dealer, willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

Overt Acts

3. In furtherance of and to accomplish the objectives of the conspiracy, defendants committed one or more overt acts in the Northern District of Illinois, which overt acts included but were not limited to the following:

a. On or about May 27, 2025, defendant ROMERO-SANCHEZ arranged for the sale of five firearms to Individual A in Chicago, Illinois, to take place on May 28, 2025;

b. On or about May 28, 2025, defendants CASTILLO-CEBALLOS and DAVID ANDRES HERMOSO-MAYOR sold five firearms, namely a Smith and Wesson model SD9VE 9mm semiautomatic pistol bearing serial number FCV3369; a Rugar model SFAR 7.62 caliber semiautomatic pistol bearing serial number 563-05889; a Glock model 42 .380 caliber semiautomatic pistol bearing serial number ADTM330; a HS Produkt model XD40 Sub-Compact .40 caliber semiautomatic rifle bearing serial number XD548960; and an Anderson Manufacturing model AM-15 multi-caliber semiautomatic rifle bearing serial number 21158133, to Individual A in Chicago, Illinois, for approximately \$5,500;

c. On or about June 4, 2025, defendants ROMERO-SANCHEZ, CASTILLO-CEBALLOS, and DAVID ANDRES HERMOSO-MAYOR sold five firearms, namely a Sarsilmaz model SAR 9 9mm semiautomatic pistol bearing serial number T1102-21BV33818; a Sun City Machinery model Stevens 320 12-gauge shotgun bearing serial number 157633L; a Smith and Wesson model T/C Arms Encore PH 308 caliber semiautomatic rifle bearing serial number MAE1945; a Palmetto State Armory model PA-15 multi-caliber semiautomatic rifle bearing serial number SCD738148; and a Diamondback Arms model DB-15 multi-caliber

semiautomatic rifle bearing serial number DB1506955 to an individual in Chicago, Illinois, for approximately \$5,600;

All in violation of Title 18, United States Code, Section 371.

COUNT FOUR

The SPECIAL JUNE 2024 GRAND JURY further charges:

Beginning on or about May 28, 2025, and continuing until the present, at Chicago, in the Northern District of Illinois, Eastern Division,

ADRIAN ANDRES ROMERO-SANCHEZ

defendant herein, not being a licensed importer, manufacturer, and dealer within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms;

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY