

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
AUG 12 PM 3:31
FILED

PT:AMC/IJ
F. #2013R01103

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

VINCENT LOMBARDO,
also known as "Big Vin," and
MELISSA HODGE LOMBARDO,
also known as "Pamela,"

Defendants.

----- X

THE GRAND JURY CHARGES:

INDICTMENT

CR 13 - 0477

Cr. No. (T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(d), 982, 1956(a)(1)(A)(i), 1956(h), 2
and 3551 et seq.; T. 21, U.S.C., § 853(p); T.
28, U.S.C., § 2461(c))

VITALIANO, J.

REYES, M.J

COUNT ONE
(Money Laundering Conspiracy)

1. In or about and between January 2011 and July 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VINCENT LOMBARDO, also known as "Big Vin," and MELISSA HODGE LOMBARDO, also known as "Pamela," together with others, did knowingly and intentionally conspire to conduct one or more financial transactions in and affecting interstate and foreign commerce, to wit: checks, deposits and transfers of funds, which transactions in fact involved the proceeds of specified unlawful activity, to wit: the use of one or more facilities in interstate or foreign commerce, to wit: the Internet, access devices and telephones, with intent to promote, manage, establish, carry on and facilitate the promotion,

management, establishment and carrying on of unlawful activity, to wit: a business enterprise involving prostitution in violation of the laws of the State of New York, in violation of Title 18, United States Code, Section 1952(a)(3), knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and with the intent to promote the carrying on of said specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNTS TWO THROUGH TWENTY-EIGHT
(Money Laundering)

2. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendants VINCENT LOMBARDO, also known as “Big Vin,” and MELISSA HODGE LOMBARDO, also known as “Pamela,” together with others, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and intentionally conduct financial transactions, to wit: transfers of funds, as set forth below, in and affecting interstate and foreign commerce, which transactions in fact involved the proceeds of specified unlawful activity, to wit: the use one or more facilities in interstate or foreign commerce, to wit: the Internet, access devices and telephones, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: a business enterprise involving prostitution in violation of the laws of the State of New York, in violation of Title 18, United States Code, Section 1952(a)(3), knowing that the property involved in such transactions represented the proceeds of some form of

unlawful activity, and with the intent to promote the carrying on of said specified unlawful activity:

COUNT	DATE	AMOUNT	DESCRIPTION
TWO	4/9/13	\$2,226.81	TD Bank Debit Card purchase – Business Asset Furniture
THREE	5/22/13	\$94.90	TD Bank Debit Card purchase – backpage.com
FOUR	5/23/13	\$179.10	TD Bank Debit Card purchase – backpage.com
FIVE	5/23/13	\$104.75	TD Bank Debit Card purchase – backpage.com
SIX	5/24/13	\$176.55	TD Bank Debit Card purchase – backpage.com
SEVEN	5/24/13	\$133.65	TD Bank Debit Card purchase – backpage.com
EIGHT	5/30/13	\$134.80	TD Bank Debit Card purchase – backpage.com
NINE	5/30/13	\$120.45	TD Bank Debit Card purchase – backpage.com
TEN	5/30/13	\$95.30	TD Bank Debit Card purchase – backpage.com
ELEVEN	5/30/13	\$87.60	TD Bank Debit Card purchase – backpage.com
TWELVE	6/5/13	\$145.05	TD Bank Debit Card purchase – backpage.com
THIRTEEN	6/5/13	\$115.05	TD Bank Debit Card purchase – backpage.com
FOURTEEN	6/5/13	\$108.20	TD Bank Debit Card purchase – backpage.com
FIFTEEN	6/5/13	\$93.70	TD Bank Debit Card purchase – backpage.com
SIXTEEN	6/14/13	\$100.65	TD Bank Debit Card purchase – backpage.com
SEVENTEEN	6/14/13	\$88.50	TD Bank Debit Card purchase – backpage.com
EIGHTEEN	6/14/13	\$81.45	TD Bank Debit Card purchase – backpage.com
NINETEEN	6/14/13	\$80.30	TD Bank Debit Card purchase – backpage.com
TWENTY	6/14/13	\$77.85	TD Bank Debit Card purchase – backpage.com
TWENTY-ONE	6/14/13	\$61.05	TD Bank Debit Card purchase – backpage.com
TWENTY-TWO	6/19/13	\$8.75	TD Bank Debit Card purchase – backpage.com

TWENTY - THREE	6/21/13	\$125.50	TD Bank Debit Card purchase – backpage.com
TWENTY-FOUR	6/21/13	85.55	TD Bank Debit Card purchase – backpage.com
TWENTY-FIVE	6/21/13	\$9.75	TD Bank Debit Card purchase – backpage.com
TWENTY-SIX	6/24/13	\$92.60	TD Bank Debit Card purchase – backpage.com
TWENTY-SEVEN	6/24/13	\$81.54	TD Bank Debit Card purchase – backpage.com
TWENTY-EIGHT	6/24/13	\$79.90	TD Bank Debit Card purchase – backpage.com

(Title 18, United States Code, Sections 1956(a)(1)(A)(i), 2 and 3551 et seq.)

COUNT TWENTY-NINE
(Felon in Possession of a Firearm)

3. In or about and between April 2013 and July 2013, both dates being approximate and inclusive, within the Southern District of Florida, the defendant VINCENT LOMBARDO, also known as “Big Vin,” having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: an AR-15 semi-automatic rifle, and ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

FIRST CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendants, VINCENT LOMBARDO, also known as “Big Vin,” and MELISSA HODGE LOMBARDO, also known as “Pamela,” that, upon their conviction on any of Counts One through Twenty-Eight,

the government will seek forfeiture in accordance with Title 18, United States Code, Section 982, of any property, real or personal, involved in such offenses or any property traceable to such property, including but not limited to the following:

- a. a forfeiture money judgment in an amount to be determined at trial;
- b. any and all interest in the real property and premises known as 4876 NW 25th Way, Boca Raton, Florida, described in the public records of Palm Beach County, Florida as Lot 116, of Glen Oaks-First Addition, according to the Plat thereof, as recorded in Plat Book 51, Pages 184-185, inclusive, and all proceeds traceable thereto;
- c. all funds on deposit or transferred to or through Wells Fargo Bank Account Nos. 8226750035 and 8226750043 held in the name of Aphrodite Productions, Ltd. and all proceeds traceable thereto;
- d. all funds on deposit or transferred to or through TD Bank Account No. 429046516 held in the name of Aphrodite Productions, Ltd. and all proceeds traceable thereto; and
- e. all funds on deposit or transferred to or through Wells Fargo Bank Account Nos. 804798811 and 25973973 held in the name of Vincent Lombardo and all proceeds traceable thereto.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

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

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853(p)).

SECOND CRIMINAL FORFEITURE ALLEGATION

6. The United States hereby gives notice to the defendant VINCENT LOMBARDO, also known as “Big Vin,” that, upon his conviction on Count Twenty-Nine, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922(g), including but not limited to the firearm and ammunition seized on or about July 17, 2013.

7. If any of the above-described forfeitable property, as a result of any act 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 party;
- 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

divided without difficulty;

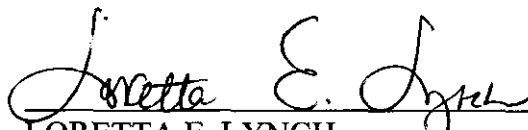
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON



LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

SIR:

PLEASE TAKE NOTICE that the within will be presented for settlement and signature to the Clerk of the United States District Court in his office at the U.S. Courthouse, 271 Cadman Plaza East, Brooklyn, New York, 11201 on the ___ day of _____, 20____, at 10:30 o'clock in the forenoon.

Brooklyn, New York

_____, 20_____

United States Attorney,
Attorney for _____

To:

Attorney for _____

SIR:

PLEASE TAKE NOTICE that the within is a true copy of _____ duly entered herein on the _____ day of _____, in the office of the Clerk of the Eastern District of New York,

Dated: Brooklyn, New York

_____, 20_____

United States Attorney,
Attorney for _____

To:

Attorney for _____

Criminal Action No.
2013R01103

**UNITED STATES DISTRICT COURT
Eastern District of New York**

UNITED STATES OF AMERICA

- against -

VINCENT LOMBARDO,
also known as "Big Vin,"

and

MELISSA HODGE LOMBARDO,
also known as "Pamela,"
Defendants.

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(d), 982, 1956(a)(1)(A)(i), 1956(h),
2 and 3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

LORETTA E. LYNCH

United States Attorney
Eastern District of New York
United States Courthouse
271 Cadman Plaza East
Brooklyn, New York 11201

Due Service of a copy of the within _____
_____ is hereby admitted.

Dated: _____, 20_____

Attorney for _____

Ilene Jaroslaw
Assistant U.S. Attorney (718) 254-6236

Anthony Capozzolo
Assistant U.S. Attorney (718) 254-6454

INFORMATION SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
CLERK
2013 AUG 12 PM 3:31
U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

1. Title of Case: United States v. Lombardo

2. Related Magistrate Docket Number(s): 13-626M

3. Arrest Date: 7/17/2013

CR 13 - 0477

4. Nature of offense(s): Felony
 Misdemeanor

5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules): None

VITALIANO, J.

6. Projected Length of Trial: Less than 6 weeks
More than 6 weeks

REYES, M.J

7. County in which crime was allegedly committed: Queens
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)

8. Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012.¹ Yes No


9. Has this indictment/information been ordered sealed? Yes No

10. Have arrest warrants been ordered? Yes No

11. Is there a capital count included in the indictment? Yes No

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By:


Ilene Jaroslaw/Anthony Capozzolo
Assistant U.S. Attorney
718-254-6236/6454

¹ Judge Brodie will not accept cases that were initiated before March 10, 2012.