

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

12 JUL 12 PM 12:44
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:12-CR-2887 MAR
21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 853 (Forfeiture)

ANTHONY MADDOX,
BEVERLY GAMBLE,
ANTHONY FREEMAN,
ALEX CARRAHER,
AMANDA RIZZO,
DAVID ZIEGEL,
HEATHER JANES,
DANIAL CRONKITE,
NICHOLAS BAKER,
PAUL BEAUPRE,
ROBIN CROSSON-PALMER,
HEIDI CHAMBLEE,
KELLY JO TEFFNER,
MICHAEL CASTLES,
JILLIAN WHITMORE,
JOANN WHITMORE, and
RYAN LUTZ

SEALED

INDICTMENT

The Grand Jury charges:

COUNT ONE

From an unknown date through on or about the date of this Indictment, in the Middle District of Florida, and elsewhere, the defendants,

SEALED

**ANTHONY MADDOX,
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ANTHONY FREEMAN,
ALEX CARRAHER,
AMANDA RIZZO,
DAVID ZIEGEL,
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ROBIN CROSSON-PALMER,
HEIDI CHAMBLEE,
KELLY JO TEFFNER,
MICHAEL CASTLES,
JILLIAN WHITMORE,
JOANN WHITMORE, and
RYAN LUTZ**

did knowingly and willfully conspire with each other and with others, both known and unknown to the Grand Jury, to possess with intent to distribute and to distribute a quantity of a mixture and substance containing a detectable amount of Oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841 (b)(1)(C).

FORFEITURE

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 21, United States Code, Section 853.

2. From their engagement in any or all of the violations alleged in Count One punishable by imprisonment for more than one year, the defendants,

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DANIAL CRONKITE,
NICHOLAS BAKER,
PAUL BEAUPRE,
ROBIN CROSSON-PALMER,
HEIDI CHAMBLEE,
KELLY JO TEFFNER,
MICHAEL CASTLES,
JILLIAN WHITMORE,
JOANN WHITMORE, and
RYAN LUTZ**

**shall forfeit to the United States, pursuant to Title 21, United States Code,
Sections 853(a)(1) and (2), all of their right, title and interest in:**

- a. property constituting and derived from any proceeds
defendants obtained, directly or indirectly, as a result of
such violations; and,**
- b. property used and intended to be used in any manner or par
to commit or to facilitate the commission of such violations.**

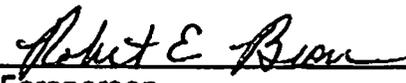
**3. If any of the property described above as being subject to forfeiture,
as a result of any act or omission of the defendants:**

- a. cannot be located upon the exercise of due diligence;**
- b. has been transferred, sold to or deposited with, a third
person;**
- 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 subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), up to the value of the forfeitable property.

A TRUE BILL


Foreperson

ROBERT E. O'NEILL
United States Attorney

By:


MARIA CHAPA LOPEZ
Assistant United States Attorney

By:


JOSEPH K. RUDDY
Assistant United States Attorney
Chief, Narcotics Section

No. 8:12-CR-

UNITED STATES DISTRICT COURT

Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

ANTHONY MADDOX
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JOANN WHITMORE, and
RYAN LUTZ

INDICTMENT

Violations: 21 U.S.C. §§ 846, 841(a)(1)

A true bill,


Foreperson

Filed in open court this 12th day

of July 2012.

Clerk

Bail \$ _____