

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF FLORIDA  
GAINESVILLE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**CASE NO: 1:17CR26-MW/GRJ**

**JERMAINE CARL CURTIS**  
\_\_\_\_\_ /

**FACTUAL BASIS FOR PLEA**

The Defendant admits that were this case to proceed to trial, the Government could prove the following facts beyond a reasonable doubt:

In January 2017, after his release from the Florida Department of Corrections, the Defendant moved to Old Town, Dixie County, Florida and into the house of co-conspirator William Lonnie Jenkins and jointly sold narcotics, including heroin and Dilaudid.

The Defendant and Jenkins bought pills from sources who had prescriptions for controlled substances. The Defendant and Jenkins began selling the controlled substances to approximately 25 people daily from the residence and sold narcotics to other users in Levy, Gilchrist and Dixie counties. The Defendant and Jenkins carried handguns during the sales to serve as protection for their operation.

As the supply of prescription drugs became scarcer, the Defendant and Jenkins began selling Dilaudid and heroin. The Dilaudid pills sold for varying

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**FILED IN OPEN COURT**  
Jm 5/16/2018  
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prices depending on the milligrams in the pill. Eight-milligram pills cost \$20.00. Heroin was packaged and sold in baggies for \$20.00.

The Defendant, in a custodial statement after *Miranda*, stated he sold narcotics during the length of the conspiracy with Jenkins. The Defendant admitted both he and his co-conspirator, Jenkins, sold over 100 grams of heroin and an unknown amount of Dilaudid pills. Jenkins acted as an enforcer for the Defendant. In March of 2017, co-conspirator Jenkins entered the home of J.T. while armed with a .25 caliber pistol. Jenkins, post *Miranda*, told law enforcement agents he went to this location to collect an overdue drug debt and to steal pills. The occupants were held at gunpoint; Jenkins fired the pistol two times, ransacked the house, and took U.S. currency.

The Defendant was armed with a handgun when he made two deliveries of Dilaudid to a confidential source, one on July 13, 2017, and one on July 16, 2017,

Police arrested the Defendant on July 18, 2017. In the car the Defendant was driving, law enforcement officers recovered 17 baggies of heroin with a weight of 4.3 grams and 43 and ½ prescription Dilaudid pills. The Defendant signed a consent to search his residence and agents seized two handguns (Walther PPK .380 and High Point C9), ammunition, 58.7 grams of heroin, 36.1 grams of marijuana, two digital scales and molds.

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Fingerprints of the Defendant were located and identified on the magazine of the Walther PPK.

After his arrest, the Defendant provided a recorded post-*Miranda* interview. He admitted the pistols were his, that he used the guns to protect himself and the drugs, that he sold controlled substances that included heroin and Dilaudid. The Defendant told the officers that he sold the drugs to pay his bills.

The Defendant has prior felony drug convictions: Possession of Cocaine in 2003, Possession of a Controlled Substance with the Intent to Sell in 2004, Possession of Cocaine with Intent to Sell and Possession of Marijuana with Intent to Sell in 2004, and Possession of Cocaine in 2016

**ELEMENTS**

Conspiracy to Distribute, and to Possess With Intent to Distribute, hydromorphone and 100 grams or more of heroin - 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(C), and 846

- (1) two or more people in some way agreed to try to accomplish a shared and unlawful plan to distribute and possess with the intent to distribute hydromorphone, and 100 grams or more of heroin;
- (2) the Defendant knew the unlawful purpose of the plan and willfully joined in it; and

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(3) the object of the unlawful plan was to possess with intent to distribute, and to distribute, hydromorphone and 100 grams or more of a mixture or substance containing heroin.

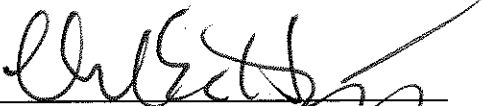
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

- 18 U.S.C. §924(c)(1)(A) (i)

(1) the Defendant committed the drug trafficking crime charged in Count One of the Indictment;

(2) the Defendant knowingly possessed the firearm, and

(3) the Defendant possessed the firearm in furtherance of the drug trafficking crime.


  
ANDERSON E. HATFIELD  
Attorney for Defendant

5/16/18  
Date

  
JERMAINE CARL CURTIS  
Defendant

5/16/18  
Date

CHRISTOPHER P. CANOVA  
United States Attorney

  
For: GREGORY P. McMAHON  
Florida Bar No. 178110  
Assistant United States Attorney  
Northern District of Florida  
401 SE 1<sup>st</sup> Avenue, Ste. 211  
Gainesville, FL 32601  
(352) 378-0996  
[Gregory.McMahon@usdoj.gov](mailto:Gregory.McMahon@usdoj.gov)

5/16/18  
Date