

**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

WILLIAM LONNIE JENKINS
_____ /

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:

From 2012 through 2016, the Defendant, while living in Old Town, Florida with his mother, assisted his mother selling marijuana, cocaine, "crack," heroin, Dilaudid (hydromorphone) and other prescription pills from the residence. In January 2017, co-conspirator Jermaine Curtis, after his release from the Florida Department of Corrections, moved into the house with the Defendant and jointly sold narcotics, including heroin and Dilaudid.

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

Filed 04/09/18 USDC Fln1 PN0245



In February 2017, J.B. bought heroin and fentanyl at the Defendant's Old Town residence. A passerby discovered J.B. dead in the front seat of his truck on February 12, 2017. The medical examiner, in the autopsy findings, determined the probable cause of death to be "mixed drug intoxication due to opiates and fentanyl analogs."

As the supply of prescription drugs became more scarce, the Defendant and Curtis, began selling Dilaudid and heroin. The Dilaudid pills sold for varying 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 approximately \$30,000.00 worth of narcotics during the length of the conspiracy with Curtis and he was paid \$5,000.00 from that amount. The Defendant admitted selling approximately 9 ounces (252 grams) of heroin and an unknown amount of Dilaudid pills. The Defendant also worked with Curtis as an enforcer to collect debts and rob others of their narcotics.

During March of 2017, the Defendant entered the home of J.T. while armed with a .25 caliber pistol. The Defendant told law enforcement he went to this location to collect an overdue drug debt and to steal pills. The Defendant held the occupants at gunpoint, fired the pistol two times, ransacked the house, and took

U.S. currency. In July of 2017, the Defendant participated in the robbery of guests at the Cadillac Motel in Gilchrist County, Florida.

Law enforcement officers arrested the Defendant on July 12, 2017 for the motel robbery. The Defendant admitted the robbery and told law enforcement where they could find the pistol. Law enforcement officers recovered the .38 special pistol used in the robbery.

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

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

(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.



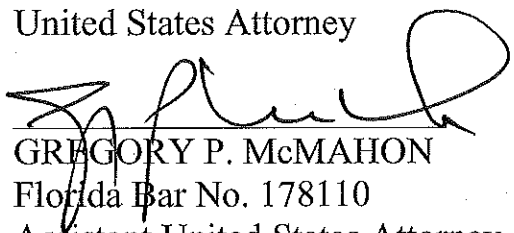
DARREN J. JOHNSON
Attorney for Defendant

April
March 9, 2018
Date

William Lonnie Jenkins
WILLIAM LONNIE JENKINS
Defendant

April
March 9, 2018
Date

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Date