

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

UNITED STATES OF AMERICA

v.

**SEALED
INDICTMENT**

**IVAN JERMAINE WIMS
JORDAN CHRISTOPHER WIMS
ALBERT DEVON KITCHEN
TICCO EARL WRIGHT
and
DANIELLE NICOLE DUNCAN**

1:16 CR7 MW/GRJ

THE GRAND JURY CHARGES:

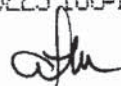
COUNT ONE

Between on or about June 1, 2013, and on or about December 28, 2015, in
the Northern District of Florida and elsewhere, the defendants,

**IVAN JERMAINE WIMS,
JORDAN CHRISTOPHER WIMS,
ALBERT DEVON KITCHEN,
TICCO EARL WRIGHT,
and
DANIELLE NICOLE DUNCAN,**

did knowingly and willfully combine, conspire, confederate, and agree together
and with other persons to distribute and possess with intent to distribute a
controlled substance, and this offense involved one kilogram or more of a mixture
and

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substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1).

Quantity of Controlled Substance Involved in the Conspiracy

With respect to defendants **IVAN JERMAINE WIMS, JORDAN CHRISTOPHER WIMS**, and **ALBERT DEVON KITCHEN**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is one kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i).

With respect to defendants **TICCO EARL WRIGHT** and **DANIEL NICOLE DUNCAN**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 100 grams or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(i).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about March 13, 2015, in the Northern District of Florida, the defendant,

IVAN JERMAINE WIMS,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

On or about March 20, 2015, in the Northern District of Florida, the defendant,

IVAN JERMAINE WIMS,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

On or about March 27, 2015, in the Northern District of Florida, the defendant,

IVAN JERMAINE WIMS,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

On or about April 10, 2015, in the Northern District of Florida, the defendant,

IVAN JERMAINE WIMS,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

On or about May 19, 2015, in the Northern District of Florida, the defendants,

**TICCO EARL WRIGHT
and
DANIELLE NICOLE DUNCAN,**

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about June 2, 2015, in the Northern District of Florida, the defendants,

**TICCO EARL WRIGHT
and**

DANIELLE NICOLE DUNCAN,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about June 9, 2015, in the Northern District of Florida, the defendant,

JORDAN CHRISTOPHER WIMS,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

On or about June 10, 2015, in the Northern District of Florida, the defendants,

**ALBERT DEVON KITCHEN
and
DANIELLE NICOLE DUNCAN,**

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code Section, 2.

COUNT TEN

On or about June 10, 2015, in the Northern District of Florida, the defendant,
DANIELLE NICOLE DUNCAN,
did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

On or about June 23, 2015, in the Northern District of Florida, the defendant,
JORDAN CHRISTOPHER WIMS,
did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

On or about June 25, 2015, in the Northern District of Florida, the
defendants,

TICCO EARL WRIGHT
and

DANIELLE NICOLE DUNCAN,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

On or about July 9, 2015, in the Northern District of Florida, the defendants,

**TICCO EARL WRIGHT
and
DANIELLE NICOLE DUNCAN,**

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about July 29, 2015, in the Northern District of Florida, the defendant,

JORDAN CHRISTOPHER WIMS,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

On or about August 25, 2015, in the Northern District of Florida, the defendants,

**TICCO EARL WRIGHT
and
DANIELLE NICOLE DUNCAN,**

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SIXTEEN

On or about August 26, 2015, in the Northern District of Florida, the defendants,

**ALBERT DEVON KITCHEN
and
DANIELLE NICOLE DUNCAN,**

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

On or about August 27, 2015, in the Northern District of Florida, the
defendant,

JORDAN CHRISTOPHER WIMS,

did knowingly and intentionally distribute a controlled substance, and this offense
involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(C).

COUNT EIGHTEEN

On or about September 23, 2015, in the Northern District of Florida, the
defendants,

**ALBERT DEVON KITCHEN
and
DANIELLE NICOLE DUNCAN,**

did knowingly and intentionally distribute a controlled substance, and this offense
involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT NINETEEN

On or about October 7, 2015, in the Northern District of Florida, the
defendant,

DANIELLE NICOLE DUNCAN,

did knowingly and intentionally distribute a controlled substance, and this offense involved methylenedioxyphenethylamine.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY

On or about October 15, 2015, in the Northern District of Florida, the defendant,

JORDAN CHRISTOPHER WIMS,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

On or about October 29, 2015, in the Northern District of Florida, the defendants,

**TICCO EARL WRIGHT
and
DANIELLE NICOLE DUNCAN,**

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

On or about October 29, 2015, in the Northern District of Florida, the defendant,

TICCO EARL WRIGHT,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy, as charged in Count One of this Indictment, did knowingly possess a firearm, to wit, a Glock .40 caliber pistol and a Bryco Arms 9 millimeter pistol.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TWENTY-THREE

On or about October 29, 2015, in the Northern District of Florida, the defendant,

TICCO EARL WRIGHT,

having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, that is:

1. On or about January 3, 2012, **TICCO EARL WRIGHT** was convicted in the State of Florida of Possession with Intent to Sell Marijuana;

2. For this crime, **TICCO EARL WRIGHT**, was subject to punishment by a term of imprisonment exceeding one year.

3. Thereafter, **TICCO EARL WRIGHT** did knowingly possess a firearm, to wit, a Glock .40 caliber pistol, a Bryco Arms 9 millimeter pistol, and ammunition, to wit, Federal, PMC Bronze, and Hornady.

4. These firearms and ammunition had previously been transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY-FOUR

On or about November 23, 2015, in the Northern District of Florida, the defendant,

JORDAN CHRISTOPHER WIMS,

did knowingly and intentionally possess with the intent to distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FIVE

On or about January 13, 2016, in the Northern District of Florida, the defendant,

DANIELLE NICOLE DUNCAN,

did knowingly and intentionally distribute a controlled substance, and this offense involved heroin.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

CONTROLLED SUBSTANCES FORFEITURE

The allegations contained in Counts One through Twenty-One and Twenty-Four through Twenty-Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

From their engagement in the violations alleged in Counts One through Twenty-One and Counts Twenty-Four through Twenty-Five of this Indictment, the defendants,

**IVAN JERMAINE WIMS,
JORDAN CHRISTOPHER WIMS,
ALBERT DEVON KITCHEN,
TICCO EARL WRIGHT,
and
DANIELLE NICOLE DUNCAN,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all of the defendants' right, title, and interest in:

A. Property constituting and derived from any proceeds the defendants obtained, directly or indirectly, as the result of such violations.

B. Property used and intended to be used in any manner or part to commit and to facilitate the commission of such violations.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendants:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

FIREARMS FORFEITURE

The allegations contained in Counts Twenty-Two and Twenty-Three of this Indictment are hereby realleged and incorporated by reference. Because the defendant,

TICCO EARL WRIGHT,


knowingly committed the violations set forth in Counts Twenty-Two and Twenty-Three of this Indictment, any and all interest that this defendant has in the firearms

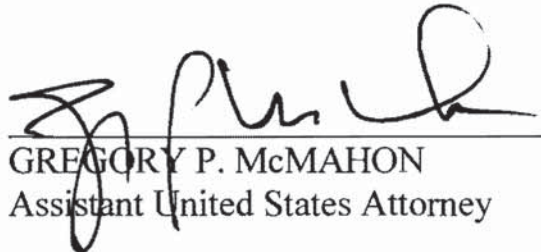
and ammunition involved in these violations is vested in the United States and hereby forfeited to the United States pursuant to Title 18, United States Code, Section 924(d)(1).

A TRUE BILL:

 
FOREPERSON

23 Feb 16
DATE


CHRISTOPHER P. CANOVA
Acting United States Attorney


GREGORY P. McMAHON
Assistant United States Attorney