

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

FILED

2019 APR -2 P 4:47

UNITED STATES OF AMERICA)
)
v.)
)
CHARLES BROOKS, JR.)

No. 3:19-CR- 51

JUDGES Varlan Poplin

U.S. DISTRICT COURT
EASTERN DIST. TENN.
DEPT. CLERK

INDICTMENT

COUNT ONE

The Grand Jury charges that from in or about March 2018 through on or about September 13, 2018, within the Eastern District of Tennessee, the defendant CHARLES BROOKS, JR., did combine, conspire, confederate and agree with another person to knowingly, intentionally, and without authority commit violations of Title 21, United States Code, Section 841(a)(1), that is to distribute and dispense, and cause to be distributed and dispensed, outside the scope of professional medical practice and not for a legitimate medical purpose, a quantity of pills and sublingual strips containing controlled substances, to include buprenorphine, also known as Suboxone, (Schedule III controlled substances), clonazepam, also known as Klonopin, and diazepam, (Schedule IV controlled substances), and pregabalin, also known as Lyrica, (Schedule V controlled substances).

[21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(c)]

COUNT TWO

The Grand Jury further charges that, on or about April 4, 2018, within the Eastern District of Tennessee, the defendant CHARLES BROOKS, JR., aided and abetted by another, in a matter involving a health care program under Title 18, United States Code, Section 24, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in

connection with the delivery of health care benefits, items and services; that is: he pre-signed a blank prescription, which he gave to another person who had no authority to prescribe controlled substances, and that person filled out the prescription for Suboxone, a Schedule III controlled substance, which was subsequently filled by a pharmacy.

[18 U.S.C. §§ 1035(a)(2) and 2]

A TRUFE RIT.I.

SIGNATURE REDACTED

FOREPERSON

APPROVED:

J. DOUGLAS OVERBEY
UNITED STATES ATTORNEY

By:



Anne-Marie Svolto
Assistant United States Attorney