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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION

UNITED STATES OF AMERICA,	:	CRIMINAL NO. 3:17-CR- <u>29</u> - CAP
v.	:	VIOLATION(S):
VERNON X. COOPER	:	21 U.S.C. § 846 i/c/w
a/k/a "BIG BOY",	:	21 U.S.C. § 841(a)(1)
CARL L. BROWN	:	21 U.S.C. § 841(b)(1)(B)(iii)
a/k/a "DREAD HEAD" and	:	21 U.S.C. § 841(b)(1)(C)
CRAIG TOWLER a/k/a "BRIAN"	:	21 U.S.C. § 841(b)(1)(D)
	:	21 U.S.C. § 841(b)(1)(E)
Defendants.	:	18 U.S.C. § 2
	:	18 U.S.C. § 924(c)

THE GRAND JURY CHARGES:

COUNT ONE
**(CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE CRACK COCAINE,
OXYCODONE, METHAMPHETAMINE AND MARIJUANA)**

That on or about January 1, 2016 to August 4, 2017, in the Athens Division of the Middle District of Georgia and elsewhere within the jurisdiction of this Court,

**VERNON X. COOPER a/k/a/ "BIG BOY", CARL L. BROWN a/k/a "DREAD HEAD",
and CRAIG TOWLER a/k/a "BRIAN",**

defendants herein, did unlawfully and willfully conspire with each other and with other persons, known and unknown to the Grand Jury, to knowingly, unlawfully and intentionally possess with intent to distribute Schedule II controlled substances, to-wit: a mixture containing a detectable amount of cocaine base also known as crack cocaine in an amount over 28 grams; a Schedule II controlled substance to-wit: mixture containing a detectable amount of methamphetamine; a Schedule II controlled substance to-wit: oxycodone; a Schedule I controlled substance to-wit: marijuana, all in violation of Title 21, United States Code, Section 846 in connection with Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(iii), (b)(1)(C), (b)(1)(D), and (b)(1)(E).

COUNT TWO
(DISTRIBUTION OF METHAMPHETAMINE AND OXYCODONE)

That on or about February 16, 2017, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

CARL L. BROWN a/k/a “DREAD HEAD”,

defendant herein, aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substances, to-wit: Oxydodone and a mixture containing a detectable amount of methamphetamine, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE
(DISTRIBUTION OF MARIJUANA)

That on or about May 19, 2016, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

CARL L. BROWN a/k/a “DREAD HEAD”,

defendant herein, aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule I controlled substance, to-wit: marijuana, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT FOUR
(DISTRIBUTION OF MARIJUANA)

That on or about June 1, 2016, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

CARL L. BROWN a/k/a “DREAD HEAD”,

defendant herein, aided and abetted by others, both known and unknown to the Grand Jury, did

unlawfully, knowingly, and intentionally distribute a Schedule I controlled substance, to-wit: Marijuana, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT FIVE
(DISTRIBUTION OF MARIJUANA)

That on or about June 10, 2016, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

**VERNON X. COOPER a/k/a “BIG BOY”
and CARL L. BROWN a/k/a “DREAD HEAD”,**

defendants herein, aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule I controlled substance, to-wit: a marijuana, in violation of Title 21 United States Code Sections 841(a)(1), 841(b)(1)(D) and Title 18 United States Code Section 2.

COUNT SIX
(POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME)

That on or about June 10, 2016, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

**VERNON X. COOPER a/k/a “BIG BOY”
and CARL L. BROWN a/k/a “DREAD HEAD”,**

defendants aided and abetted by each other and by others and, both known and unknown to the Grand Jury, did knowingly, and unlawfully possess a firearm, to-wit: one Hi-Point, model CF380, .380 caliber firearm, serial # P6110208, during and in relation to and in furtherance of a drug trafficking offense which is prosecutable in a court of the United States, to-wit: distribution of a controlled substance incorporated by reference in Count One and Count Five of this Indictment, all in violation of Title 18, United States Code, Sections 924(a)(1); 924(c), and Title 18, United

States Code ,Section 2.

COUNT SEVEN
(DISTRIBUTION OF METHAMPHETAMINE AND MARIJUANA)

That on or about February 7, 2017 in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

VERNON X. COOPER a/k/a “BIG BOY” and CRAIG TOWLER a/k/a “BRIAN”, defendants herein, aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute Schedule II controlled substances, to-wit: a mixture containing a detectable amount of methamphetamine; a schedule I controlled substance, to-wit: marijuana, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 841 (b)(1)(D), and Title 18, United States Code, Section 2.

COUNT EIGHT
(DISTRIBUTION OF METHAMPHETAMINE)

That on or about April 10, 2017, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

VERNON X. COOPER a/k/a “BIG BOY”
and CARL L. BROWN a/k/a “DREAD HEAD”, defendant herein, aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: a mixture containing a detectable amount of methamphetamine; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINE
(DISTRIBUTION OF COCAINE AND CRACK COCAINE)

That on or about May 22, 2017, in the Athens Division of the Middle District of Georgia,

and elsewhere within the jurisdiction of the Court,

**VERNON X. COOPER a/k/a "BIG BOY"
and CARL L. BROWN a/k/a "DREAD HEAD",**

defendants herein, aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: cocaine and a mixture containing a detectable amount of cocaine base also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TEN

(DISTRIBUTION OF CRACK COCAINE)

That on or about July 5, 2017, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

VERNON X. COOPER a/k/a "BIG BOY",

defendant herein, aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: a mixture containing a detectable amount of cocaine base also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT ELEVEN

**(POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING
OFFENSE)**

That on or about July 5, 2017, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of the Court,

VERNON X. COOPER a/k/a "BIG BOY",

defendant herein, aided and abetted by others, both known and unknown to the Grand Jury, did

knowingly, and unlawfully possess a firearms, to-wit: one Kel-Tec CNC Inc, model Sub 2000, 9mm caliber firearm, serial # FC588 and one DSA Inc., model ZM4,. 223 caliber rifle, serial #DSF009375, during and in relation to and in furtherance of a drug trafficking offense which is prosecutable in a court of the United States, to –wit: distribution of controlled substances incorporated by reference in Count One and Count Eleven of this Indictment, all in violation of Title 18, United States Code, Sections 924(a)(1), 924(c), and Title 18, United States Code, Section 2.

A TRUE BILL.

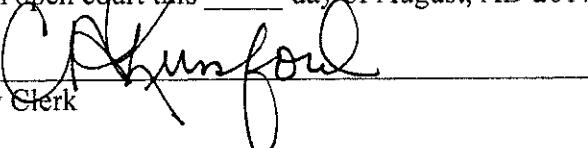
s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PRESENTED BY:

G.F. PETERMAN, III
UNITED STATES ATTORNEY


TAMARA A. JARRETT
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 10 day of August, AD 2017.


Deputy Clerk