

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

**UNITED STATES OF AMERICA**

**v.**

**ROB LEE YOUNG  
and  
AMY COOPER**

**SUPERSEDING  
INDICTMENT  
5:09cr30/RS**

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**THE GRAND JURY CHARGES:**


**COUNT ONE**

That from on or about March 1, 2006, through on or about May 27, 2009, in the Northern District of Florida and elsewhere, the defendant,

**ROB LEE YOUNG,**

did knowingly and willfully combine, conspire, confederate and agree with other persons to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and that this offense involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii).

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



**COUNT TWO**

That on or about May 9, 2009, in the Northern District of Florida, the defendant,

**ROB LEE YOUNG,**

did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and that this offense involved a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

**COUNT THREE**

That on or about May 9, 2009, at approximately 11:37 a.m., in the Northern District of Florida, the defendant,

**ROB LEE YOUNG,**

did knowingly and intentionally use and cause to be used a communications facility, that is, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code Section 841(a)(1), that is, distribution and possession with intent to distribute a controlled substance, as charged in Count Two of this Superseding Indictment, in violation of Title 21, United States Code, Section 843(b).

**COUNT FOUR**

That on or about May 12, 2009, in the Northern District of Florida, the defendant,

**ROB LEE YOUNG,**

did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and

that this offense involved a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

**COUNT FIVE**

That on or about May 12, 2009, at approximately 1:01 p.m., in the Northern District of Florida, the defendant,

**ROB LEE YOUNG,**

did knowingly and intentionally use and cause to be used a communications facility, that is, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), that is, distribution and possession with intent to distribute a controlled substance, as charged in Count Four of this Superseding Indictment, in violation of Title 21, United States Code, Section 843(b).

**COUNT SIX**

That on or about May 27, 2009, at approximately 8:30 a.m., in the Northern District of Florida, the defendant,

**AMY COOPER,**

did knowingly and intentionally use and cause to be used a communications facility, that is, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), that is, distribution and possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 843(b).

**COUNT SEVEN**

That on or about May 27, 2009, in the Northern District of Florida, the defendant,

**ROB LEE YOUNG,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and that this offense involved a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

**CONTROLLED SUBSTANCE FORFEITURE**

The allegations contained in Counts One through Seven of this Superseding indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

From their engagement in the violations alleged in Counts One through Seven of this Superseding Indictment, each of which is punishable by imprisonment for more than one year, the defendants,

**ROB LEE YOUNG  
and  
AMY COOPER,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853(a)(1) and (2), all of their interests in:

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

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

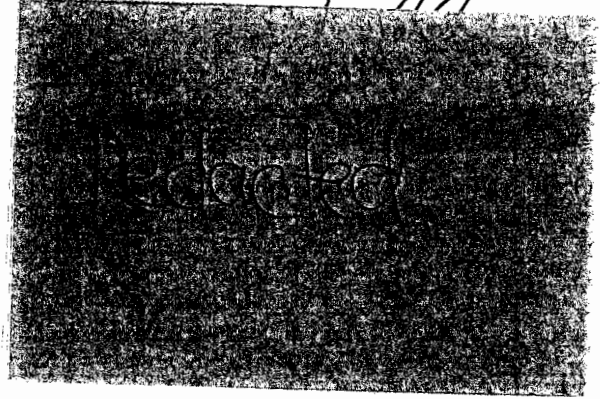
If any of the property subject to forfeiture as a result of any act or omission of the defendants:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third person;
- C. has been placed beyond the jurisdiction of this Court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property, which cannot be divided 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 said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL



*Thomas F. Kirwin*  
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THOMAS F. KIRWIN  
United States Attorney

*Joe*  
*[Signature]*  
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GAYLE E. LITTLETON  
Assistant United States Attorney