IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

14 CR - 213-AS

# THE UNITED STATES OF AMERICA

-1/S-

REGINALD ROYAL, SR. (Counts 1-4), and JEANNETTE KNIGHTNER a/k/a Tiny Ball (Counts 1, 4) MAY 2014 GRAND JURY (Impaneled 5/9/2014)

INDICTMENT

Violations: Title 21, United States Code, Sections 841(a)(1), 846, and 860(a); Title 18, United States Code, Section 2 (4 Counts)

> RECEIVED AND FILED UNITED STATES DISTRICT COURT CLERIG WESTERN DISTRICT OF NEW YORK

> > DEC 5 - 2014

## COUNT 1

(Conspiracy)

The Grand Jury Charges That:

Between in or about June 2014, the exact date being unknown, and on or about June 18, 2014, in the Western District of New York, and elsewhere, the defendants, **REGINALD ROYAL, SR.** and **JEANNETTE KNIGHTNER a/k/a Tiny Ball**, did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to commit the following offenses, that is:

(a) to possess with intent to distribute, and to distribute, a mixture and substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and

(b) on and within 1,000 feet of the real property comprising the Baker Homes Public Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, to possess with intent to distribute, and to distribute, a mixture and substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

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

## COUNT 2

## (Possession with Intent to Distribute and Distribution of Heroin Within 1,000 Feet of Public Housing Property)

#### The Grand Jury Further Charges That:

On or about June 11, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Baker Homes Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **REGINALD ROYAL**, **SR.**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, a mixture and substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

#### COUNT 3

## (Possession with Intent to Distribute and Distribution of Heroin Within 1,000 Feet of Public Housing Property)

## The Grand Jury Further Charges That:

On or about June 16, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Baker Homes Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **REGINALD ROYAL**, **SR.**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, a mixture and substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

#### COUNT 4

## (Possession of Heroin with Intent to Distribute)

### The Grand Jury Further Charges That:

On or about June 18, 2014, in the Western District of New York, and elsewhere, the defendants, REGINALD ROYAL, SR. and JEANNETTE KNIGHTNER a/k/a Tiny Ball, did knowingly, intentionally and unlawfully possess with intent to distribute a mixture and substance containing heroin, a Schedule I controlled substance.

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All 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.

DATED: Buffalo, New York, December 5, 2014.

# WILLIAM J. HOCHUL, JR. United States Attorney

BY:

S/EDWARD H. WHITE Assistant United States Attorney United States Attorney's Office Western District of New York 138 Delaware Avenue Buffalo, New York 14202 716/843-5862 edward.h.white@usdoj.gov

A TRUE BILL:

# S/FOREPERSON