

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

14 CR - 213-~~A~~S

MAY 2014 GRAND JURY
(Impaneled 5/9/2014)

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

REGINALD ROYAL, SR.
(Counts 1-4), and
JEANNETTE KNIGHTNER a/k/a Tiny Ball
(Counts 1, 4)

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

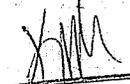
COUNT 1

(Conspiracy)

The Grand Jury Charges That:

ORIGINAL
RECEIVED AND FILED
UNITED STATES DISTRICT COURT CLERK
WESTERN DISTRICT OF NEW YORK

DEC 5 - 2014

BY: 

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.

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