

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

NOVEMBER 2008 GRAND JURY
(Empaneled 11/07/2008)

THE UNITED STATES OF AMERICA

-vs-

INDICTMENT

RONALD BLAIR

Violation:

Title 18, United States
Code, Section 875(c)
(Four Counts)

COUNT ONE

The Grand Jury Charges That:

AT APPROXIMATELY 4:38 A.M., on or about February 11, 2009, in the Western District of New York, the defendant, RONALD BLAIR, knowingly and willfully transmitted in interstate commerce from in and around Lancaster, New York, through the State of Connecticut and to the cell phone of the recipient, whose identity is known to the grand jury ("recipient"), which was also in and around Lancaster, New York, a threat to injure the recipient and another whose identity is also known to the grand jury ("another").

THAT IS TO SAY, at approximately 4:38 a.m., on or about February 11, 2009, the defendant sent the following text message from his cellular telephone (716-982-5717) to the recipient's cellular telephone, which text message was transmitted through a Verizon Wireless switch node in Windsor, Connecticut:

*I'm coming over with a 2 club
bros.want to know where
jimiggy lives.bottom line.fuck*

and which text message constituted and was a threat to injure the recipient and another.

ALL in violation of Section 875(c) of Title 18 of the United States Code.

COUNT TWO

The Grand Jury Further Charges That:

AT APPROXIMATELY 4:49 A.M., on or about February 11, 2009, in the Western District of New York, the defendant, RONALD BLAIR, knowingly and willfully transmitted in interstate commerce from in and around Lancaster, New York, through the State of Connecticut and to the cell phone of the recipient, whose identity is known to the grand jury ("recipient"), which was also in and around Lancaster, New York, a threat to injure the recipient and another whose identity is also known to the grand jury ("another").

THAT IS TO SAY, at approximately 4:49 a.m., on or about February 11, 2009, the defendant sent the following text message from his cellular telephone (716-982-5717) to the recipient's cellular telephone, which text message was transmitted through a Verizon Wireless switch node in Windsor, Connecticut:

Tell him to call a doctor.boy.

and which text message constituted and was a threat to injure the recipient and another.

ALL in violation of Section 875(c) of Title 18 of the United States Code.

COUNT THREE

The Grand Jury Further Charges That:

AT APPROXIMATELY 5:00 A.M., on or about February 11, 2009, in the Western District of New York, the defendant, RONALD BLAIR, knowingly and willfully transmitted in interstate commerce from in and around Lancaster, New York, through the State of Connecticut and to the cell phone of the recipient, whose identity is known to the grand jury ("recipient"), which was also in and around Lancaster, New York, a threat to injure the recipient and another whose identity is also known to the grand jury ("another").

THAT IS TO SAY, at approximately 5:00 a.m., on or about February 11, 2009, the defendant sent the following text message from his cellular telephone (716-982-5717) to the recipient's cellular telephone, which text message was transmitted through a Verizon Wireless switch node in Windsor, Connecticut:

Sorry to be you.fuck.

and which text message constituted and was a threat to injure the recipient and another.

ALL in violation of Section 875(c) of Title 18 of the United States Code.

COUNT FOUR

The Grand Jury Further Charges That:

AT APPROXIMATELY 3:35 P.M., on or about February 11, 2009, in the Western District of New York, the defendant, RONALD BLAIR, knowingly and willfully transmitted in interstate commerce from in and around Lancaster, New York, through the State of Connecticut and to the cell phone of the recipient, whose identity is known to the grand jury ("recipient"), which was also in and around Lancaster, New York, a threat to injure the recipient and another whose identity is also known to the grand jury ("another").

THAT IS TO SAY, at approximately 3:35 p.m., on or about February 11, 2009, the defendant sent the following text message from his cellular telephone (716-982-5717) to the recipient's cellular telephone, which text message was transmitted through a Verizon Wireless switch node in Windsor, Connecticut:

Info... fucker.....

and which text message constituted and was a threat to injure the recipient and another.

ALL in violation of Section 875(c) of Title 18 of the United States Code.

DATED: Buffalo, New York, February 17, 2009.

KATHLEEN M. MEHLTRETTER
Acting United States Attorney

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A TRUE BILL:

S/FOREPERSON
FOREPERSON