FILED 1 DAYLE ELIESON **United States Attorney** 2018 JUN 22 PM 12: 43 2 BRANDON JAROCH Assistant United States Attorney U.S. MAGISTRATE JUDGE 3 501 Las Vegas Blvd. South, Suite 1100 Las Vegas, Nevada 89101 4 PHONE: (702) 388-6336 FAX: (702) 388-6698 5 brandon.jaroch@usdoj.gov 6 Attorneys for the United States 7 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 8 -oOo-9 Magistrate No. UNITED STATES OF AMERICA, 18-mj-597 10 COMPLAINT Plaintiff, 11 21 U.S.C.  $\S\S$  841(a)(1) and (b)(1)(C) -12 Distribution of a Controlled Substance -TIANNA CORDOVA and Oxycodone and Amphetamine (Adderall) ROBERT THORNBURG, 13 18 U.S.C. § 2 – Aiding and Abetting Defendants. 14 15 16 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the 17 undersigned complainant, being duly sworn, deposes and states: 18 COUNT ONE (Distribution of a Controlled Substance – Oxycodone and Amphetamine (Adderall)) 19 On or about May 24, 2018, in the State and Federal District of Nevada, 20 TIANNA CORDOVA and 21 ROBERT THORNBURG, 22 defendants herein, aiding and abetting one another, did knowingly and intentionally 23 distribute a mixture and substance containing a detectable amount of oxycodone and

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amphetamine (Adderall), Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

## **FACTS**

On May 24, 2018, a DEA confidential source (CS) conducted a controlled purchase of ten 30mg Oxycodone pills, thirty 10mg Oxycodone pills, and five Adderall tablets from CORDOVA at her residence located at 1480 Paseo Verde Parkway, Apt. 2108, Henderson, NV. The CS and CORDOVA communicated via text message to arrange the transaction.

After the transaction, the CS was debriefed and provided the following information to agents. CORDOVA said she had thirty pills of 10mg Oxycodone for \$10.00 each, ten pills of 30mg Oxycodone pills for \$25.00 each, and five pills of Adderall for \$7.00 each which the CS agreed to purchase. CS stated CORDOVA took the pills from the island in the kitchen and put them in a prescription bottle. The CS stated that s/he saw a black handgun (possibly a 9mm) on the coffee table in the living room during the transaction. The CS stated that THORNBURG counted the \$600.00 that the CS provided for the drugs.

On June 20, 2018, a search warrant was authorized by the Honorable Carl W. Hoffman, United States Magistrate Judge, District of Nevada, for 1480 Paseo Verde Parkway, Apt 2108, in Henderson, NV. On June 21, 2018, the search warrant was executed and both CORDOVA and THORNBURG were present and arrested. Subsequent to the search of the premises, varied amounts of oxycodone, hydrocodone, alprazolam, four firearms, and an unknown amount of U.S. currency were seized.

Both CORDOVA and THORNBURG read and signed an acknowledgement and waiver of their *Miranda* warnings and agreed to speak to law enforcement. The following are brief summaries of their interviews:

- a) THORNBURG stated that he was aware of CORDOVA's drug trafficking activities and that he had participated in drug transactions with CORDOVA on more than one occasion. Most recently, THORNBURG stated that within approximately the past week he participated in a drug transaction with CORDOVA, who was buying an unspecific amount of suspected oxycodone tablets from an unknown person. THORNBURG stated that at some point CORDOVA realized the tablets were fake. CORDOVA and THORNBURG pursued the unknown party in their vehicle. THORNBURG stated that once the other vehicle stopped, a confrontation ensued and that both he (THORNBURG) and an occupant in the other vehicle drew firearms and pointed them at each other. No shots were fired and all parted ways.
- b) CORDOVA admitted that she has distributed various controlled substances.
  She further stated that she provided pills that thought were oxycodone when in fact they contained fentanyl that led to the overdoes death of another individual in 2017.

Based on the foregoing, your Affiant believes there is probable cause to believe that TIANNA CORDOVA and ROBERT THORNBURG, aided and abetted each other in the knowing and intentional distribution of oxycodone and amphetamine (Adderall), in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C). Drug Enforcement Administration SUBSCRIBED and SWORN to before me this 22nd day of June, 2018. HONORABLE CAR HOFFMAN UNITED STATES MAGISTRATE JUDGE