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6 Attorneys for the United States

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 TIANNA CHRISTINA CORDOVA and
13 ROBERT JAMES THORNBURG,

14 Defendants.

**SUPERSEDING
CRIMINAL INDICTMENT**

Case No.: 2:18-cr-00208-RFB-CWH

VIOLATIONS:

21 U.S.C. §§ 841(a)(1), (b)(1)(C) and 846 –
Conspiracy to Distribute a Controlled
Substance – Oxycodone and Amphetamine
(Adderall)

21 U.S.C. §§ 841(a)(1) and (b)(1)(C) –
Distribution of a Controlled Substance –
Oxycodone, Amphetamine (Adderall), and
Fentanyl

18 U.S.C. § 2 – Aiding and Abetting

18 U.S.C. § 924(c)(1)(A) – Possession of
a Firearm in Furtherance of a Drug
Trafficking Crime

18 U.S.C. §§ 922(g)(3) and 924(a)(2) –
Possession of a Firearm by a Prohibited
Person

21 U.S.C. § 843(b) – Illegal Use of
Communication Facility

23 THE GRAND JURY CHARGES THAT:

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Count One
(Conspiracy to Distribute a Controlled Substance – Oxycodone and Amphetamine (Adderall))

Beginning from a time unknown, and continuing to on or about June 21, 2018, in the State and Federal District of Nevada,

**TIANNA CHRISTINA CORDOVA and
ROBERT JAMES THORNBURG,**

defendants herein, knowingly and intentionally combined, conspired, confederated and agreed with each other, and with other persons known and unknown to the grand jury, to distribute a mixture and substance containing a detectable amount oxycodone and amphetamine (Adderall), Schedule II Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and 846.

Count Two
(Distribution of a Controlled Substance Resulting in Death – Fentanyl)

On or about March 14, 2017, in the State and Federal District of Nevada,

TIANNA CHRISTINA CORDOVA,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II Controlled Substance, the use of which resulted in the death of C.K., in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

Count Three
(Distribution of a Controlled Substance – Oxycodone)

On or about April 25, 2018, in the State and Federal District of Nevada,

TIANNA CHRISTINA CORDOVA,

1 defendant herein, did knowingly and intentionally distribute a mixture and
2 substance containing a detectable amount of oxycodone, a Schedule II Controlled
3 Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
4 (b)(1)(C).

5 Count Four
6 (Distribution of a Controlled Substance – Oxycodone)

7 On or about May 1, 2018, in the State and Federal District of Nevada,

8 **TIANNA CHRISTINA CORDOVA,**

9 defendant herein, did knowingly and intentionally distribute a mixture and
10 substance containing a detectable amount of oxycodone, a Schedule II Controlled
11 Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
12 (b)(1)(C).

13 Count Five
(Distribution of a Controlled Substance – Oxycodone and Amphetamine (Adderall))

14 On or about May 24, 2018, in the State and Federal District of Nevada,

15 **TIANNA CHRISTINA CORDOVA and**
16 **ROBERT JAMES THORNBURG,**

17 defendants herein, aiding and abetting one another, did knowingly and
18 intentionally distribute a mixture and substance containing a detectable amount of
19 oxycodone and amphetamine (Adderall), Schedule II controlled substances, in
20 violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title
21 18, United States Code, Section 2.

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Count Six
(Distribution of a Controlled Substance – Oxycodone)

On or about June 18, 2018, in the State and Federal District of Nevada,

**TIANNA CHRISTINA CORDOVA and
ROBERT JAMES THORNBURG,**

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

Count Seven
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

Beginning from a time unknown, and continuing to on or about June 21, 2018, in the State and Federal District of Nevada,

**TIANNA CHRISTINA CORDOVA and
ROBERT JAMES THORNBURG,**

the defendants herein, did knowingly possess a firearm, to wit: a Ruger, Model SP 101, .357 caliber revolver, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, Conspiracy to Distribute a Controlled Substance, as charged in Count One of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

Count Eight
(Possession of a Firearm by a Prohibited Person)

On or about June 21, 2018, in the State and Federal District of Nevada,

TIANNA CHRISTINA CORDOVA,

1 then being an unlawful user of a controlled substance as defined in Title 21, United
2 States Code, Section 802, did knowingly possess a firearm, to wit: a Ruger, Model
3 SP 101, .357 caliber revolver, said possession being in and affecting interstate
4 commerce and said firearm having been shipped and transported in interstate
5 commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and
6 924(a)(2).

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8 Count Nine

(Possession of a Firearm by a Prohibited Person)

9 On or about June 21, 2018, in the State and Federal District of Nevada,

10 **ROBERT JAMES THORNBURG,**

11 then being an unlawful user of a controlled substance as defined in Title 21, United
12 States Code, Section 802, did knowingly possess firearms, to wit: a Ruger, Model
13 SP 101, .357 caliber revolver; a Marlin Glenfield, Model 60, .22 caliber rifle; a
14 Browning Arms, .22 caliber rifle; and a Westernfield, Model M155A, .410 gauge
15 shotgun, said possession being in and affecting interstate commerce and said
16 firearm having been shipped and transported in interstate commerce, all in
17 violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

18 Count Ten

(Illegal Use of Communication Facility)

19 On or about July 3, 2018, in the State and Federal District of Nevada,

20 **TIANNA CHRISTINA CORDOVA,**

21 defendant herein, did knowingly and intentionally use any communication facility,
22 a telephone located at the Nevada Southern Detention Center, to communicate with
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1 J.L.P., who is not charged in this indictment, who was using a cellular telephone
 2 with an assigned number of (702) XXX-6351, in facilitating the commission of any
 3 act or acts constituting a felony under Title 21, United States Code, Sections
 4 841(a)(1), (b)(1)(C) and 846, that is, Conspiracy to Distribute Buprenorphine and
 5 Naloxone (Suboxone), a Schedule III controlled substance, in violation of Title 21,
 6 United States Code, Section 843(b).

7 **DATED:** this 21st day of August, 2018.

8 **A TRUE BILL:**

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 / s /
 FOREPERSON OF THE GRAND JURY

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13 DAYLE ELIESON
 United States Attorney

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BRANDON C. JAROCH
 Assistant United States Attorney

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