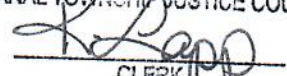


1 Case No. 22 CR 00150 3F
2 DA Case No. CR220402

FILED

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CANAL TOWNSHIP JUSTICE COURT


CLERK

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6 **IN THE JUSTICE COURT OF CANAL TOWNSHIP**
7 **IN AND FOR THE COUNTY OF LYON, STATE OF NEVADA**
8

9 STATE OF NEVADA,

AMENDED CRIMINAL COMPLAINT

10 Plaintiff,

11 vs.

12 TROY E. DRIVER,

13 Defendant.
14 _____ /

15 COMES NOW, Plaintiff, State of Nevada, by and through STEPHEN B. RYE, Lyon
16 County District Attorney, and hereby verifies and declares upon information and belief and
17 under penalty of perjury, that TROY E. DRIVER, the Defendant above-named, has
18 committed the following crime(s):

19 **COUNT I**
20 **FIRST DEGREE MURDER WITH THE USE OF A DEADLY WEAPON, in violation of NRS**
21 **200.010, NRS 200.030, NRS 200.030(1)(a), and NRS 193.165,**
22 **a CATEGORY A FELONY**

23 That on or between March 12, 2022 and March 25, 2022, in Canal Township, Lyon
24 County, and New River Township, Churchill County, State of Nevada, the Defendant did
25 willfully, unlawfully and feloniously kill a human being with malice aforethought, either
26 express or implied, with premeditation and deliberation, the unlawful killing committed in the
27 manner following, to-wit: the Defendant did kill NAOMI IRION with a deadly weapon, namely
28 a firearm, by shooting her, thereby inflicting mortal injuries upon the said victim, all of which
occurred at or near a rural portion of northern Churchill County, Nevada, the preparatory

1 acts of which to accomplish said crime commencing at or near 1550 E. Newlands Drive,
2 Fernley, Nevada, and/or the concealment of said crime recommencing at or near 1550 E.
3 Newlands Drive, Fernley, Nevada.

4 **COUNT II**
5 **KIDNAPPING IN THE FIRST DEGREE, in violation of NRS 200.310 and NRS 200.320,**
6 **a CATEGORY A FELONY**

7 That on or about March 12, 2022, in Canal Township, Lyon County, State of Nevada,
8 Defendant did willfully seize, confine, inveigle, entice, decoy, abduct, conceal, kidnap or
9 carry away a person by any means whatsoever with the intent to hold or detain, or who
10 holds or detains, the person for ransom, or reward, or for the purpose of committing sexual
11 assault, extortion, or robbery upon or from the person, or for the purpose of killing the
12 person or inflicting substantial bodily harm upon the person, or to exact from relatives,
13 friends, or any other person any money or valuable thing for the return or disposition of the
14 kidnapped person, to wit: Defendant did abduct Naomi Irion and did hold or detain her and
15 did carry her away to the location in northern Churchill County, Nevada, for the purpose of
16 committing sexual assault and/or for the purpose of killing her, all of which occurred at or
17 near 1550 E. Newlands Drive, Fernley, Lyon County, Nevada.

18 **COUNT III**
19 **ROBBERY, in violation of NRS 200.380, a CATEGORY B FELONY**

20 That on or about March 12, 2022, in Canal Township, Lyon County, State of Nevada,
21 the Defendant did willfully, intentionally, and unlawfully take personal property from the
22 person of another, or in the same person's presence, against his or her will, by means of
23 force or violence or fear of injury, immediate or future, to his or her person or property, in the
24 manner following, to wit, the Defendant entered NAOMI IRION's car and drove it away with
25 her inside the car, against her will, all of which occurred at or near 1550 E. Newlands Drive,
26 Fernley, Nevada.

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1 **COUNT IV**
2 **BURGLARY OF A MOTOR VEHICLE, in violation of NRS 205.060(1)(c),**
3 **a CATEGORY E FELONY**

4 That on or about March 12, 2022, in Canal Township, Lyon County, State of Nevada,
5 the Defendant, by day or night, did unlawfully enter or unlawfully remain in a motor vehicle,
6 or any part thereof, namely, a 1992 Mercury Sable owned and/or occupied by NAOMI
7 IRION, with the intent to commit grand or petit larceny, assault or battery on any person or
8 any felony, all of which occurred at or near 1550 E. Newlands Drive, Fernley, Nevada.

9 **COUNT V**
10 **DESTROYING EVIDENCE, in violation of NRS 199.220,**
11 **a GROSS MISDEMEANOR**

12 That on or between March 12, 2022 and March 25, 2022, in Canal Township, Lyon
13 County, State of Nevada, the Defendant, with the intent to conceal the commission of any
14 felony, or to protect or conceal the identity of any person committing the same, did willfully
15 destroy, alter, erase, obliterate or conceal any book, paper, record, writing, instrument or
16 thing, in the manner following, to wit: the Defendant did dispose of tires from his truck to
17 conceal or destroy evidence of a felony and to protect or conceal his identity as the one
18 responsible for the crimes; he did bury the body of NAOMI IRION in an attempt to conceal or
19 destroy evidence of the kidnapping, murder, and other crimes; that he did destroy or conceal
20 NAOMI IRION's cell phone, all of which occurred at various locations in Lyon, Churchill,
21 Pershing, Humboldt and/or Eureka County. Venue is appropriate in Lyon County because
22 the felony crimes for which the defendant concealed or destroyed evidence were committed
23 in whole or in part in Lyon County, Nevada.

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1 All of which is contrary to the form of statute in such cases made and provided and
2 against the peace and dignity of the State of Nevada. Complainant prays that a summons
3 and/or warrant be issued and that said Defendant be dealt with according to law.

4 I declare under penalty of perjury under the law of the State of Nevada that the
5 foregoing is true and correct.

6 DATED this 5th day of April, 2022.

7 STEPHEN B. RYE
8 District Attorney

9 

10 By: _____
11 Stephen B. Rye
12 District Attorney

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