


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

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

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9 STATE OF NEVADA, **SECOND AMENDED CRIMINAL**  
10 **COMPLAINT**  
11 vs. Plaintiff,  
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 a  
28 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, when the said defendant drove his truck to Walmart, staked out the  
3 location and the victim, kidnapped the victim, and the concealment of said crime  
4 recommencing at or near 1550 E. Newlands Drive, Fernley, Nevada, when the defendant  
5 returned to that location to return the victim's car to an unidentified location nearby, when he  
6 returned to Walmart to obtain his truck which he drove to the location to commit the  
7 kidnapping, and when he later moved the victim's car to another location and the intent to kill  
8 formed in Lyon County before he kidnapped Naomi Irion.

9 And/or that the said defendant did on or between March 12, 2022 and March 25,  
10 2022, within the County Lyon, State of Nevada, did willfully and unlawfully kidnap Naomi  
11 Irion from 1550 E. Newlands Drive, Fernley, Lyon County, Nevada, with the intent to commit  
12 murder and/or sexual assault, and during the perpetration of said crime of kidnapping did kill  
13 Naomi Irion by shooting her with a firearm.

14 **COUNT II**  
15 **KIDNAPPING IN THE FIRST DEGREE WITH THE USE OF A DEADLY WEAPON, in**  
16 **violation of NRS 200.310 and NRS 200.320 AND NRS 193.165,**  
17 **a CATEGORY A FELONY**

18 That on or about March 12, 2022, in Canal Township, Lyon County, State of Nevada,  
19 Defendant did willfully seize, confine, entice, decoy, abduct, conceal, kidnap or carry away a  
20 person by any means whatsoever with the intent to hold or detain, or who holds or detains,  
21 the person for ransom, or reward, or for the purpose of committing sexual assault, extortion,  
22 or robbery upon or from the person, or for the purpose of killing the person or inflicting  
23 substantial bodily harm upon the person, or to exact from relatives, friends, or any other  
24 person any money or valuable thing for the return or disposition of the kidnapped person, to  
25 wit: Defendant did abduct Naomi Irion and did hold or detain her and did carry her away to  
26 the location in northern Churchill County, Nevada, for the purpose of committing sexual  
27 assault and/or for the purpose of killing her, and the defendant did use a deadly weapon, to  
28 wit, a firearm, in the commission of the crime, all of which started at or near 1550 E.  
Newlands Drive, Fernley, Lyon County, Nevada, and continued into a rural area of Churchill

1 County, Nevada, where the defendant completed the killing of the victim and buried her, all  
2 as one continuous course of conduct beginning in Lyon County, Nevada.

3 **COUNT III**  
4 **SEXUAL ASSAULT, in violation of NRS 200.366(2)(B), a CATEGORY A FELONY**

5 That on or around the 12th day of March, 2022, in New River Township, Churchill  
6 County, State of Nevada, Defendant did willfully and unlawfully subject another person to  
7 sexual penetration against the person's will or under conditions in which the perpetrator  
8 knew or should have known that the victim is mentally or physically incapable of resisting or  
9 understanding the nature of the conduct, to-wit: Defendant did subject Naomi Irion to sexual  
10 penetration, namely anal penetration, against her will or under conditions in which the  
11 defendant knew or should have known that the victim was mentally or physically incapable  
12 of resisting, all of which occurred somewhere between 1550 E. Newlands Drive, Fernley,  
13 Lyon County, Nevada, and near a rural portion of northern Churchill County, Nevada, the  
14 preparatory acts of which to accomplish said crime commencing at or near 1550 E.  
15 Newlands Drive, Fernley, Nevada, where the Defendant kidnapped the victim with the intent  
16 to commit sexual assault, and/or the concealment of said crime recommencing at or near  
17 1550 E. Newlands Drive, Fernley, Nevada.

18 **COUNT IV**  
19 **ROBBERY WITH THE USE OF A DEADLY WEAPON, in violation of NRS 200.380, a**  
20 **CATEGORY B FELONY**

21 That on or about March 12, 2022, in Canal Township, Lyon County, State of Nevada,  
22 the Defendant did willfully, intentionally, and unlawfully take personal property from the  
23 person of another, or in the same person's presence, against his or her will, by means of  
24 force or violence or fear of injury, immediate or future, to his or her person or property, with  
25 the use of a deadly weapon, to wit, a firearm, in the manner following, to wit, the Defendant  
26 entered Naomi Irion's car and drove it away with her inside the car, against her will, all of  
27 which occurred beginning at or near 1550 E. Newlands Drive, Fernley, Nevada, and  
28 continuing to a rural area of Churchill County, Nevada, where the defendant disposed of  
certain of the property that was taken from the person or person's presence.



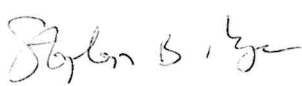
1 destroy, alter, erase, obliterate or conceal any book, paper, record, writing, instrument or  
2 thing, in the manner following, to wit: the Defendant did dispose of tires from his truck to  
3 conceal or destroy evidence of a felony and to protect or conceal his identity as the one  
4 responsible for the crimes; he did bury the body of Naomi Irion in an attempt to conceal or  
5 destroy evidence of the kidnapping, murder, and other crimes; that he did destroy or conceal  
6 Naomi Irion's cell phone, all of which occurred at various locations in Lyon, Churchill,  
7 Pershing, Humboldt and/or Eureka County. Venue is appropriate in Lyon County because  
8 the felony crimes for which the defendant concealed or destroyed evidence were committed  
9 in whole or in part in Lyon County, Nevada, and all part of a continuing course of conduct for  
10 crimes that commenced on March 12, 2022, in Lyon County, Nevada.

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

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

16 DATED this 19<sup>th</sup> day of July, 2022.

17  
18 STEPHEN B. RYE  
19 District Attorney

20   
21 By: \_\_\_\_\_  
22 Stephen B. Rye  
23 District Attorney  
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