

**FILED**

September 24, 2020

AO 91 (Rev. 11/11) Criminal Complaint

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**UNITED STATES DISTRICT COURT**

BY:

klw

DEPUTY

for the

Western District of Texas

United States of America

v.

NAA-ASHELEY OLLENNU

Case No. A:20-mj-822 SH

\_\_\_\_\_  
*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 11, 2019 in the county of Travis in the  
Western District of Texas, the defendant(s) violated:*Code Section*

Title 21 USC §843 (a) (3)

*Offense Description*To acquire or obtain possession of a controlled substance by  
misrepresentation, fraud, forgery, deception, or subterfuge.

This criminal complaint is based on these facts:

Please see attachment.

☒ Continued on the attached sheet.\_\_\_\_\_  
*Complainant's signature*

Sean Morrow, Special Agent

\_\_\_\_\_  
*Printed name and title*

Sworn to telephonically and signed electronically this 24th day of September, 2020.

Date: September 24, 2020\_\_\_\_\_  
*Judge's signature*City and state: Austin, Texas

Susan Hightower, US Magistrate

\_\_\_\_\_  
*Printed name and title*

**AFFIDAVIT**

I, Sean Morrow, being duly sworn, depose and state the following:

**I. INTRODUCTION**

1. I am a Special Agent of the Drug Enforcement Administration (DEA). As such, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1).

2. I have been employed as a Special Agent for approximately eight and half years. I have received extensive training pertaining to narcotic investigations and the investigations of various crimes which arise from drug trafficking activities.

3. I have received specialized training on the subject of narcotics trafficking and money laundering from the DEA and have been personally involved in investigations concerning the possession, manufacture, distribution, and importation of controlled substances, as well as methods used to finance drug transactions.

4. I have participated in and conducted investigations of violations of various State and Federal criminal laws, including unlawful possession with intent to distribute controlled substances, distribution of controlled substances, use of a communication

facility to commit narcotic offenses, importation of controlled substances, conspiracy to import, possess and distribute controlled substances, and money laundering, all in violation of Title 21 and Title 18, United States Code. These investigations resulted in arrests of individuals who have imported, smuggled, received and distributed controlled substances, including cocaine, marijuana, heroin, methamphetamine and pharmaceutical controlled substances and the arrest of individuals who have laundered proceeds emanating from those illegal activities. Also, these investigations resulted in seizures of illegal drugs / controlled substances and proceeds from the distribution of those illegal drugs / controlled substances.

5. I have directed confidential informants and cooperating witnesses to successfully infiltrate various-sized narcotic enterprises via intelligence gathering, participation in consensual recordings and monitored purchases of controlled substances. I have executed search warrants for controlled substances and I have conducted surveillance in connection with numerous narcotic investigations.

6. I am familiar with the operations of illegal international drug trafficking organizations in various parts of the world, including Central America, Mexico, India, Texas, and throughout the world.

7. I am familiar with the ways in which narcotic traffickers conduct their business, including methods of importing and distributing narcotics, money laundering, the use of cellular telephones and the internet to facilitate their illegal acts, and the use of numerical codes and code words to conduct drug transactions. My training and experience as a Special Agent of the DEA, my conversations with other Special Agents/Task Force Officers of the DEA, and state and local investigators familiar with narcotics trafficking and money laundering

matters, form the basis of the opinions and conclusions set forth below, which I drew from the facts set forth herein.

## II. RELEVANT FACTS

8. Affiant submits the following “specific and articulable facts” showing that there is probable cause to believe that **Naa-Asheley OLLENNU** acquired or obtained possession of a controlled substance by misrepresentation, fraud, forgery, deception, or subterfuge in violation of Title 21, United States Code, Section §843 (a) (3), as set forth below.

9. On July 12, 2019, the San Antonio District Office (SADO) Diversion Group D-92 received a phone call from Rannon Ching, Pharmacist in Charge (PIC), concerning possible employee pilferage and diversion of controlled substances at Tarrytown Pharmacy, 2727 Exposition Boulevard, Suite 105, Austin, Texas 78703.

10. On July 25, 2019, the DEA SADO Group D92 Investigators conducted an accountability audit at Tarrytown Pharmacy which revealed a shortage of -12,600.00 dosage units of oxycodone 30mg tabs, -5,560.00 dosage units of hydrocodone 10/325mg tabs, and -5,315.00 dosage units of alprazolam 2mg tabs. During, and subsequent to, the accountability audit, Investigators obtained and reviewed controlled substance records, video surveillance, and inventory software login history from Tarrytown Pharmacy.

11. The inventory software login history identified **Naa-Asheley OLLENNU**, a former Certified Pharmacy Technician at Tarrytown Pharmacy, of placing controlled substances orders with Tarrytown Pharmacy’s supplier, using other pharmacists’ login pins. The other pharmacists, provided statements indicating they did not authorize, and had no knowledge of **Naa-Asheley OLLENNU** using their login pins. When the orders were subsequently received, **Naa-Asheley OLLENNU** would obtain the controlled substances, and again use the

pharmacists' login pin to manually adjust the quantities in the pharmacy inventory software, and subtract the amount **Naa-Asheley OLLENNU** obtained, all within seconds.

12. A review of the inventory software login history and the manual adjustments shows that, from June 7, 2018, through July 11, 2019, **Naa-Asheley OLLENNU** adjusted Tarrytown Pharmacy's inventory on 39 occasions; -12,100.00 dosage units of oxycodone 30mg tabs, a schedule II controlled substance, -5,000.00 dosage units of hydrocodone 10mg/325mg tabs, a schedule II controlled substance, -100.00 dosage units of methylphenidate ER 27mg tabs, a schedule II controlled substance, and -530 dosage units of alprazolam 2mg tabs, a schedule IV controlled substance.

13. Review of the video surveillance on July 11, 2019, at approximately 10:25AM, shows **Naa-Asheley OLLENNU** placing a manufacturer's bottle of medication in her jacket pocket. This prompted PIC Ching to confront **Naa-Asheley OLLENNU** and to her admitting to PIC Ching that she had obtained the missing controlled substances.

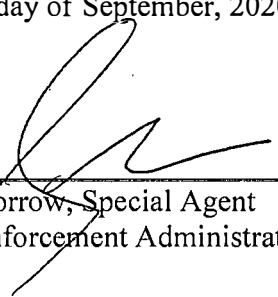
14. After a cursory reconciliation by PIC Ching on July 11, 2019, it was determined that the manufacturer's bottle **Naa-Asheley OLLENNU** placed in her jacket pocket contained 200 dosage units of oxycodone 30MG that had been previously ordered fraudulently by **Naa-Asheley OLLENNU**, and had been manually subtracted from the inventory by **Naa-Asheley OLLENNU** using another pharmacists login pin without their authorization or knowledge.

### III. CONCLUSION

15. Based on the information contained in this affidavit, I submit that there is probable cause to believe that from June 7, 2018, through July 11, 2019, in Austin, Texas, within the Western District of Texas, **Naa-Asheley OLLENNU** unlawfully, knowingly and intentionally acquired or obtained possession of a controlled substance by misrepresentation,

fraud, forgery, deception, or subterfuge, specifically, 17,200 dosage units of a schedule II controlled substances, and 530 dosage units of a schedule IV controlled substance, in violation of Title 21, United States Code, Section §843 (a) (3).

Sworn to telephonically and signed this 24th day of September, 2020.



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Sean Morrow, Special Agent  
Drug Enforcement Administration