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ENDORSED
Plumas Superior Court

APR 11 2024

DEBORAH NORRIE,
Clerk of the Court

By _____ M.Bastian _____
Deputy Clerk

RETURN COPY TO DA

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE PLUMAS

13 The People of the State of California

14 Plaintiff,

15 vs.

16 CASSANDRA BETH LAVLEY 07/12/1984

17 Defendant(s).

CASE No. F24-00 156

CRIMINAL COMPLAINT
FOR ARREST WARRANT

18 The District Attorney of Plumas County, California hereby accuses the above
19 named defendant(s) of the following criminal offenses occurring in the County of
20 Plumas, State of California.

COUNT I

21 **PC503/504: Embezzlement By Public Or Private Officer - Felony (16-2-3 County
22 Jail)**

23 On and between January 1, 2022 and November 21, 2023, Cassandra Beth
24 Lavley, while an employee at **Plumas County Sheriff's Employee's Association**, did
25

1 unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful
2 execution of her trust, property which she had in her possession and under her control
3 by virtue of her trust and did unlawfully secrete said property, to wit: from the **Plumas**
4 **County Sheriff's Employee's Association Main Account**, with a fraudulent intent to
5 appropriate it to such a use and purpose contrary to Penal Code section 487(a), said
6 property being of a value exceeding Nine Hundred Fifty Dollars (\$950), in violation of
7 PENAL CODE SECTIONS 503/504.

9

10 COUNT II

11 **PC503/504: Embezzlement By Public Or Private Officer - Felony (16-2-3 County**

12 Jail)

14 On and between January 1, 2022 and November 21, 2023, Cassandra Beth
15 Lavley, while an employee at **Plumas County Sheriff's Employee's Association**, did
16 unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful
17 execution of her trust, property which she had in her possession and under her control
18 by virtue of her trust and did unlawfully secrete said property, to wit: from the **Plumas**
19 **County Sheriff's Employee's Association Needy Children Account**, with a
20 fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code
21 section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars
22 (\$950), in violation of PENAL CODE SECTIONS 503/504.

COUNT III

2255(b): Fraudulent Alteration Of Books By A Corporate Officer - Felony (16-2-3
County Jail)

On or between January 1, 2022 and November 21, 2023, Cassandra Beth Lavley serving as a director, officer and agent of a corporation, did willingly and with the intent to defraud, destroy, alter, mutilate and falsify a book, paper, writing and security belonging to the corporation and made and concurred in omitting to make any material entry in any book of accounts and other record or document kept by the corporation, in violation of CORPORATIONS CODE SECTION 2255(b).

PROBABLE CAUSE STATEMENT

Further, attached and incorporated by reference is a statement of probable cause and related crime reports which the plaintiff believes establishes probable cause for the pretrial restraint of defendant CASSANDRA BETH LAVLEY, for the above-listed crimes.

An investigation has been conducted to determine if said defendant(s) did commit the stated crime(s). Reports of the investigation, attached hereto and incorporated by reference, show probable cause that defendant(s) did commit the crime(s).

On this April 10, 2024, in the County of Plumas, I certify and declare under penalty of perjury that the foregoing is true and correct.

DAVID HOLLISTER
District Attorney

By

Graham Archer
Assistant District Attorney

Pursuant to Penal Code section 1054.5(b), the People are hereby informally requesting that defendant(s) and his or her attorney provide to the People the discovery required by Penal Code section 1054.3. This is a continuing request pursuant to the provisions of Penal Code section 1054.7.

1 At the request of the District Attorney, I, upon review of the reports attached and
2 incorporated herein by reference, find sufficient probable cause for a warrant of arrest to
3 be issued pursuant to Penal Code section 813 or 1427 for the following defendant(s):
4 CASSANDRA BETH LAVLEY

5
6 Bail is set at: **\$50,000**

7
8 Upon motion by the Plaintiff the source of any proffered bail shall be examined by the
9 Court prior to the defendant's release on bail.

10
11 Dated: APR 11 2024

Janet A. Hilde

12 _____
13 Judge of the Superior Court

STATEMENT OF PROBABLE CAUSE

In December 2023, Plumas County Sheriff's Sergeant Jake Vickrey and Deputy Chandler Peay presented the District Attorney's office evidence of suspected misuse of Plumas County Sheriff's Employee's Association funds by **Cassandra Beth Lavley**.

6 At all times during the period of the offense conduct, Defendant **Cassandra Beth**
7 **Lavley** was employed as a dispatcher for the Plumas County Sheriff's Office and
8 served as Secretary/Treasurer of the Plumas County Sheriff's Employee's Association
9 (the "Association"). In this role **Cassandra Beth Lavley** was responsible for handling
10 the Association's finances and keeping the Association's financial records. During this
11 period of time, the Association maintained three bank accounts at Plumas Bank. Two
12 accounts were actively used: one for handling general expenses, the "Main Account,"
13 and the other for transactions related to the Association's holiday charitable activities,
14 the "Needy Children Account." The Main Account is funded by Association member
15 dues, and the Needy Children Account is funded primarily by community donations. The
16 Association has been incorporated as a Nonprofit Corporation in the State of California
17 since May 3, 2012. Deputy Peay is the President of the Association.

18 Both Peay and **Cassandra Beth Lavley** attended a conference on behalf of the
19 Association in Anaheim in November, 2023. Peay noticed **Cassandra Beth Lavley's**
20 expenses were far higher than his. Peay discovered **Cassandra Beth Lavley** had used
21 the Association's American Express card to purchase airfare, Disneyland tickets, and
22 "character breakfasts" for her family. None of those purchases were authorized by the
23 Association. **Cassandra Beth Lavley** used the Main Account to pay the American
24 Express bill for those charges months prior to the trip.

25 Peay looked into previous American Express charges made by **Cassandra Beth**
26 **Lavley** and found hotel charges at Planet Hollywood in Las Vegas in March, 2023.
27 Peay reviewed **Cassandra Beth Lavley's** social media postings and discovered she

1 posted about attending a Miranda Lambert concert at Planet Hollywood in Las Vegas in
2 March, 2023. Peay also discovered a hotel booking at the Silver Legacy in Reno
3 charged to the Association American Express by **Cassandra Beth Lavley** for
4 November, 2022. Peay reviewed a social media posting by **Cassandra Beth Lavley**
5 about attending a Jo Koy comedy show at the Reno Events Center Reno on the date
6 the booking was made. These events and expenses were not for Association purposes.

7 The board members of the Association confronted **Cassandra Beth Lavley**
8 about the charges on November 20, 2023. She claimed they were a mistake, and she
9 must have pulled the wrong card out of her wallet. **Cassandra Beth Lavley** agreed to
10 resign from the Association and agreed to pay back approximately \$2900. **Cassandra**
11 **Beth Lavley** wrote the Association a check for \$2,958.89 on November 21, 2023.

12 Peay investigated the finances of the Association further and discovered unusual
13 charges to both the Main Account and Needy Children Account during 2022 and 2023.
14 Prior to **Cassandra Beth Lavley** holding the position, Peay served as
15 Secretary/Treasurer for more than two years. When reviewing bank records for the
16 period **Cassandra Beth Lavley** was Secretary/Treasurer, Peay saw a high volume of
17 debit transactions to both accounts from Amazon and Costco and was unable to locate
18 documentation of the purchases. Peay contacted **Cassandra Beth Lavley** about the
19 receipts, who claimed she was told by their accounting firm she did not need to keep
20 receipts. Peay contacted a representative for the accounting firm who denied advising
21 **Cassandra Beth Lavley** to not keep receipts.

22 Peay confirmed all debit transactions between 2022 and 2023 were made with
23 the debit cards issued to **Cassandra Beth Lavley**. Peay reviewed the QuickBooks
24 records kept by **Cassandra Beth Lavley** and was unable to determine the items
25 purchased from those entries.

26 On November 21, 2023, **Cassandra Beth Lavley** was placed on administrative
27 leave from the Sheriff's Office. **Cassandra Beth Lavley** contacted Peay and indicated
28

1 she had items delivered to her house she claimed were for the Needy Children
2 program. Some of those items were dropped off at Peay's house, and others were
3 picked up from **Cassandra Beth Lavley** by employees of the Sheriff's Department. The
4 items were inconsistent with those the Association would purchase for the Needy
5 Children program and were consistent with items ordered for **Cassandra Beth Lavley**
6 and her children. For instance, the items included clothing for an adult woman, as well
7 as shoes, toys and clothing favored by & for children the ages of **Cassandra Beth**
8 **Lavley's** children. Further, they included expensive brand name items inconsistent with
9 those purchased for the Needy Children program.

10 In December, 2023, Peay presented the bank and accounting records to myself
11 and DA Investigator Shawn Adams. We obtained via search warrant the Amazon and
12 Costco purchase records made by **Cassandra Beth Lavley** with the Association debit
13 cards in 2022 and 2023. The records contained purchases made with the Association
14 cards under accounts bearing **Cassandra Beth Lavley's** e-mail addresses.

15 Peay and Sergeant Vickrey, with the assistance of other Sheriff's office
16 employees, reviewed the purchases to determine which might have been for legitimate
17 Association purposes and which were **Cassandra Beth Lavley** personal purchases.

18 Of the unauthorized charges identified, more than \$19,000 were made from
19 Amazon over the course of 2022 and 2023. They included clothing, electronics, home
20 décor, household supplies, beauty supplies, food, and dietary supplements. Peay and
21 Vickrey noted, based on the timing of purchases and nature of the items, there was no
22 legitimate basis for them to be bought for the Association.

23 Among those purchases were the following:

24 ASUS Chromebook Laptop - \$339.55
25 Hisense 50-inch Smart TV - \$327.74
26 Inofia Queen Mattress - \$428.99
27 Insignia 42-inch Smart TV - \$177.59

1 Faux Cow Hide Rug - \$51.47
2 Sun Bum SPF 50 Sunscreen - \$19.83
3 47" Console Sofa Table - \$96.51

4 None of these items are within the possession of the Association or were
5 provided to an Association event recipient.

6 **Cassandra Beth Lavley** primarily directed the unauthorized items to be shipped
7 her home address, and in some instances to her daughter's address in Chico.

8 Of the unauthorized charges, more than \$2,000 were made to Costco over the
9 course of 2022 and 2023. Those purchases included clothing, frozen fruit, beer, wine,
10 liquor, flowers, melatonin, and a rotisserie chicken.

11 Vickrey and Peay reviewed **Cassandra Beth Lavley** and **Cassandra Beth**
12 **Lavley's** family's social media postings and were able to identify a number of the items
13 purchased. Among the items, a TV, couch covers, barstools, side tables, and other
14 home decorations were identified in photographs of **Cassandra Beth Lavley's**
15 daughter's residence in Chico.

16 Peay discovered **Cassandra Beth Lavley** miscategorized purchases in
17 QuickBooks as being for stocking the Association's vending machine or the Needy
18 Children program in order to conceal her wrongdoing.

19 Based on the information obtained during this investigation, as summarized
20 above, your affiant believes **Cassandra Beth Lavley** has violated Penal Code Sections
21 503/504, Embezzlement, and Corporation Code Section 2255(b), Falsification of
22 Corporate Documents.

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