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2 DISTRICT ATTORNEY  
3 SBN 162450  
4 County of Plumas  
5 520 Main St.  
6 Quincy, CA 95971  
7 (530) 283-6303  
8 GRAHAM ARCHER  
9 Assistant District Attorney  
10 SBN 262464

11 Attorneys for Plaintiff

12  
13 **RETURN COPY TO DA**

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

16 The People of the State of California

17 Plaintiff,

18 vs.

19 CASSANDRA BETH LAVLEY 07/12/1984

20 Defendant(s).

21 CASE No. F24-00 **156**

22 CRIMINAL COMPLAINT

23 FOR ARREST WARRANT

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

27 **COUNT I**

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

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

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.  
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9  
10 **COUNT II**

11 **PC503/504: Embezzlement By Public Or Private Officer - Felony (16-2-3 County**  
12 **Jail)**  
13

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.  
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1 COUNT III

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

4 On or between January 1, 2022 and November 21, 2023, Cassandra Beth Lavley  
5 serving as a director, officer and agent of a corporation, did willingly and with the intent  
6 to defraud, destroy, alter, mutilate and falsify a book, paper, writing and security  
7 belonging to the corporation and made and concurred in omitting to make any material  
8 entry in any book of accounts and other record or document kept by the corporation, in  
9 violation of CORPORATIONS CODE SECTION 2255(b).  
10  
11

12 **PROBABLE CAUSE STATEMENT**

13  
14 Further, attached and incorporated by reference is a statement of probable cause  
15 and related crime reports which the plaintiff believes establishes probable cause for the  
16 pretrial restraint of defendant CASSANDRA BETH LAVLEY, for the above-listed crimes.  
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18

19 An investigation has been conducted to determine if said defendant(s) did  
20 commit the stated crime(s). Reports of the investigation, attached hereto and  
21 incorporated by reference, show probable cause that defendant(s) did commit the  
22 crime(s).  
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1 On this April 10, 2024, in the County of Plumas, I certify and declare under  
2 penalty of perjury that the foregoing is true and correct.

3  
4 DAVID HOLLISTER  
District Attorney

5  
6  
7 By   
8 Graham Archer  
Assistant District Attorney

9  
10  
11 Pursuant to Penal Code section 1054.5(b), the People are hereby informally  
12 requesting that defendant(s) and his or her attorney provide to the People the discovery  
13 required by Penal Code section 1054.3. This is a continuing request pursuant to the  
14 provisions of Penal Code section 1054.7.  
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At the request of the District Attorney, I, upon review of the reports attached and incorporated herein by reference, find sufficient probable cause for a warrant of arrest to be issued pursuant to Penal Code section 813 or 1427 for the following defendant(s):

CASSANDRA BETH LAVLEY

Bail is set at: \$50,000

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

Dated: APR 11 2024

**Janet A. Hilde**

Judge of the Superior Court

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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  
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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.