

1 DA Case ID No. 0190823
2 C DAVID EYSTER (SBN 113115) nc
3 District Attorney
4 Mendocino County
5 100 North State Street, Room G-10
6 PO Box 1000
7 Ukiah, CA 95482
8 (707) 463-4211

9 Attorneys for Plaintiffs

FILED

10/13/2023

KIM TURNER, CLERK OF THE COURT
SUPERIOR COURT OF CALIFORNIA,
COUNTY OF MENDOCINO

Lyly, Julie

DEPUTY CLERK

11 IN THE SUPERIOR COURT OF CALIFORNIA
12 IN AND FOR THE COUNTY OF MENDOCINO

13 THE PEOPLE OF THE STATE OF
14 CALIFORNIA,

15 Plaintiffs,

16 vs.

17 **PAULA JUNE KENNEDY,**
18 **CHAMISE CAMERON CUBBISON,**

19 Defendants.

COMPLAINT-CRIMINAL
FELONY

CASE NO.

23CR02523-A
23CR02523-B

20 **THE UNDERSIGNED, ON INFORMATION AND BELIEF, COMPLAINS AND SAYS,**
21 **THAT WITHIN THE COUNTY OF MENDOCINO, STATE OF CALIFORNIA**


22 **COUNT ONE**

23 On and between October 1, 2019 and August 31, 2022, in the County of Mendocino,
24 State of California, the crime of **MISAPPROPRIATION OF PUBLIC FUNDS** in violation of
25 Penal Code section 424(a), a FELONY, was committed in that Mendocino County's then-
26 Payroll Manager, **PAULA JUNE KENNEDY**, and defendant Kennedy's then-supervisor,
27 **CHAMISE CAMERON CUBBISON**, both being public employees charged with the receipt,
28 safekeeping, transfer, and distribution of taxpayer monies and funds, as a principal, aider and
abettor, and as participants in an uncharged criminal conspiracy, did knowingly, unlawfully,
and serially misappropriate public funds from the Mendocino County treasury in the amount

1 of \$68,106.59 (not including interest), said unlawful disbursements having been paid out to
2 defendant Kennedy was not authorized by the law or otherwise authorized by a majority of
3 the sitting Mendocino County Board of Supervisors in a public vote.

4 Complainant therefore prays that said defendant be dealt with according to law and
5 that warrants issue for the arrest of said defendants.

6 I declare under penalty of perjury that the foregoing is true and correct, executed on
7 this 13th day of October 2023 in Ukiah, County of Mendocino, State of California.

8
9 
10 C DAVID EYSTER
11 District Attorney

12 Pursuant to Penal Code Section 1054.3, the prosecuting attorney hereby requests
13 that the defendant and her attorney disclose the following:

14 “(a) The names and addresses of persons, other than the defendant, she intends to
15 call as witnesses at the trial, together with any relevant written or recorded statements of
16 those persons, or reports of the statements of those persons, including any reports of
17 statements of experts made in connection with the case, and including the results of
18 physical or mental examinations, scientific tests, experiments, or comparisons which the
19 defendant intends to offer in evidence at the trial.”

20 “(b) Any real evidence which the defendant intends to offer in evidence at the trial.”
21
22
23
24
25
26
27
28