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FILED
2017 SEP 28 AM 11:42
U.S. DISTRICT COURT
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
CASSANDRA ALEXANDER,
Defendant.

CR No. 17 **CR00601-GW**
I N F O R M A T I O N
[18 U.S.C. § 666(a)(1)(A): Theft
From Organization Receiving
Federal Funds]

The Acting United States Attorney charges:

[18 U.S.C. § 666(a)(1)(A)]

1. The City of Glendale, California ("Glendale") was a local government located within Los Angeles County that received Federal assistance benefits in excess of \$10,000 for each of the years 2001 through 2017 under a Federal program.

2. At all times relevant to this Information, defendant CASSANDRA ALEXANDER ("ALEXANDER") was an agent of Glendale employed in the position of Claims and Litigation Support Supervisor at the Glendale City Attorney's Office.

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1 3. As part of her duties, defendant ALEXANDER was responsible
2 for assembling "Settlement Packets," which contained records
3 memorializing the settlement of claims brought against Glendale for
4 personal injury or property damage, including the documents showing
5 that an assistant City Attorney and the City Council had approved the
6 settlement and payment to the claimant. Defendant ALEXANDER was also
7 responsible for submitting the Settlement Packets to the City
8 Attorney's Office Finance Department for issuance of checks payable
9 to the claimants. The Settlement Packets included a "Request for
10 Demand" form, which authorized the Finance Department to issue the
11 check payable to the claimant in the approved amount. Defendant
12 ALEXANDER had authority to sign the Request for Demand form, without
13 limit as to the amount. Defendant ALEXANDER also had the authority
14 to take possession of the checks issued by the Finance Department,
15 for the purpose of providing the checks to claimants' attorneys.

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1 4. Beginning in or about July 2001, and continuing through on
2 or about March 2017, in Los Angeles County, within the Central
3 District of California, defendant ALEXANDER knowingly and willfully
4 embezzled, stole, and obtained by fraud approximately \$692,764.84 in
5 funds owned by, and under the care, custody, and control of Glendale.

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9 SANDRA R. BROWN
 Acting United States Attorney

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12 LAWRENCE S. MIDDLETON
 Assistant United States Attorney
13 Chief, Criminal Division

14 MACK E. JENKINS
 Assistant United States Attorney
15 Chief, Public Corruption & Civil
 Rights Section

16 PATRICIA A. DONAHUE
 Assistant United States Attorney
17 Public Corruption & Civil Rights
18 Section