IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR MANATEE COUNTY, FLORIDA

STATE OF FLORIDA	*	CLERK'S NUMBER:
	*	
VS.	*	MSO CASE NUMBER: 2026-002018
	*	
Cassandra Lee Kelley	*	S.A.O. NUMBER:

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

Before me, a **JUDGE** of the **CIRCUIT COURT**, in and for Manatee County, Florida, **DETECTIVE Randall Walker,** a duly sworn officer of the **MANATEE COUNTY SHERIFF'S OFFICE,** personally or by sworn attestment says that on or about the 5th of September 2024 in the aforesaid county, one Cassandra Lee Kelley, did unlawfully commit:

eWarrant # 105878

Count 1 – **Scheme to Defraud $50,000+**, contrary to Florida Statutes, section FSS 817.034(4)(A)(1) in such case made and provided and against the peace and dignity of the State of Florida.

To Wit;,

Cassandra Lee Kelley was the Parkwood Lakes Homeowner's Association Treasurer in 2024 and 2025 and resided in the community at 8601 29th Street East, Parrish, FL 34219, within Manatee County. On 01/23/26 a new HOA board was elected.

The previous board refused to give them (the new board) access to records and bank accounts. On 1/26/26 representatives of the new board met with the bank (Bank of America) to change bank accounts to the new board members. On 1/28/26 the new treasurer met with a Bank of America associate and that is when the new treasurer was informed that the accounts were almost depleted. The checking account would have had expected approximately $25,000 but the balance was only around $1,084. The savings account would be expected to be approximately $108,000 but the balance was only around $59. When the new HOA board started doing their own investigation, they discovered checks were being made to Cassandra Kelley's personal businesses and Zelle payments were being made to her husband and father. Her personal businesses are "C&D Dining" and "Lake Effect Investments". When looking back at the previous two years that Cassandra Lee Kelly was the HOA Treasurer and had control and custody over both Parkwood Lakes Homeowner's Association Bank of America checking and savings accounts. They estimated that approximately $160,000 has been taken from the Parkwood Lakes HOA accounts and used for Cassandra Lee Kelley's own personal interests. The new board then reported the incident to the Manatee County Sheriff's Office on 01/30/2026.

Your affiant reviewed the documents provided to the Manatee County Sheriff by the current HOA administration they filed the initial report. Upon reviewing the documents your affiant discovered Cassandra Lee Kelley uses the HOA's Bank of America Checking account to issue checks to herself and her businesses spanning from 01/07/2025 through 10/07/25 totaling $81,598.14. The vast majority of the checks were issued to "Lake Effect Investments" while there are (3) issued to C&D Dining and (1) to Cassandra Kelley".

Your affiant completed review all of the documents that were provided in the initial report. Your affiant called the current treasurer of Parkwood Lakes HOA and confirmed that the HOA never used Zelle what so ever. Additionally, she

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confirmed the HOA never paid any vendor in cash and there was no reason to withdrawal cash out of the account. The treasurer also confirmed that Cassandra Lee Kelley was the treasurer beginning 01/01/2024 through 12/31/25.

In review of the several hundred pages of documents it appears Cassandra Lee Kelley uses the HOA Bank of America checking and savings accounts to take funds from for her own personal use. There are occasions when she does make deposits repaying the HOA for money she took from them for personal use without their knowledge or consent.

Your affiant learned that Cassandra Lee Kelley owned a restaurant under the entity Name C& D Dining Ventures LLA located at 3200 Matecumbe Key Road, Punta Gorda, FL 33955 based of her FEI Number 85-2325972. This restaurant did business as Cass Cay Restaurant & Bar. Additionally, FEI number 46-5535681 lists her as the registered agent of Lake Effect Investments Inc. with a CT mailing address and the same Matecumbe Key Road address for her.

Your affiant confirmed a Default Final Judgement in excess of $64,000 was issued in the lawsuit of Plaintiff: Sysco Gulf Coast LLC vs C&D Dining Ventures LLC recorded in the Manatee County Clerk of Courts under case number 20240CC002864AX.(originally 2022CC002864) This Default Final Judgement was signed on 01/27/2024. There was a previous lawsuit (2018-CC-000527), Sysco (Plaintiff) vs. Lake Effect Investments Inc. DBA Cass Cay Restaurant where the final judgment signed on June 15, 2018 was recorded for the amount in excess of $4,000.

Your affiant subpoenaed Bank of America, Zelle and Crews Bank and Trust. The fulfillment included (11) still images of Cassandra Kelley cashing/depositing checks issues off Parkwood Lakes HOA Bank of America account and a 1361 page PDF of her Crews Bank and Trust Checking accounts ending in both [redacted] and [redacted] The subpoena still images included Kelley both inside the branch and also at the bank's drive through window. The majority of the transactions for the (11) still images took place at Crews Bank and Trust-Sarasota: 15 S Palm Ave, Sarasota, FL 34236. There was one transaction shown as 8-25-25 Peachland which is reference to Crews Bank and Trust located at the Peachland Promenade located at 24163 Peachland Blvd, Port Charlotte, FL 33954.

The subpoena fulfillment has Copies of Florida Driver's license number K400-112-86-710-0 which belongs to Cassandra Lee Kelley and Connecticut Driver's License number 197604218 belonging to William Edward Kelley, both including pictures of Cassandra and William. These copies of driver's licenses is located on page 35/1361 on the Crews Bank and Trust subpoena fulfillment. On page 36/1361 the account holder information shows Account Holder Name: Lake Effect Investments, Inc. DBA Cass Cay Restaurant & Bar with SSN/TIN [redacted], mailing address of 3200 Matecumbe Key Lane, Punta Gorda, FL 33955 and phone number of 941-347-7148. The account was opened on 09/27/2016. The signers for the account are as follows: William E. Kelley, President of Lake Effect Investments, Inc., Cassandra L Kelley, Agent of Lake Effect Investments, Inc., Rosario C Kelley, Secretary of Lake Effect Investments, Inc., and George D. Repp III, Agent of Lake Effect Investments, Inc.
***There is a typed note on this page (36/1361) from Crews Bank and Trust which states: "Note that current authorized signers are Cassandra L Kelley & William E. Kelley".

The Bank of America subpoena fulfillment contained the certified records of Parkwood Lakes Homeowners Association. The business signature card for the checking account and savings account showed Cassandra L Kelley as a "Signer" on those accounts.

Despite all diligent efforts, Bank of America has not fulfilled the last outstanding subpoena requesting the video of the (21) cash withdrawals. Your affiant never received the (21) Branch withdrawals made from Parkwood Lakes HOA's Bank of America account in the Bank of America branch bank(s). These transactions occurred from 1/25/25 through 8/27/25 totaling $87,500. The retention period for video has long since expired and it is likely that after Bank of America providing the fulfillment (yet erroneously not including the actual video just documentation essentially a table of contents) the video was not preserved by them and therefore never responded to my additional request. The HOA has previously reported that they DO NOT operate in cash and NEVER take cash out of the account in this manner. The only person with the means, motive, and opportunity to do so was Cassandra L Kelley. Regardless of these cash transactions. There were (8) Zelle transactions made from the HOA account to Cassandra's husband and father over the time frame of 09/24/24 through 09/25/24 totaling $37,200. Lastly there were 29 checks written from the HOA account to Cassandra's Businesses and deposited into the bank account from 01/07/2025 through 10/07/025 totaling $81,548.14. The total amount of loss the Parkland Lakes HOA suffered as a direct result of Cassandra L. Kelley's ongoing scheme to defraud totals $206,698.14.

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$87,900 of that were the cash withdrawals previously discussed. Even without the cash withdrawals the amount of loss that is proven totals $118,798.14 well exceeding the First-Degree Felony level of Scheme to Defraud $50,000+.

Cassandra Lee Kelley did violate the above referenced statue when she used the Parkwood Lakes Homeowner's Association Bank of America Checking and Savings account for her own personal use starting on 09/05/2024 through 10/07/25. Cassandra Lee Kelley conducted on a systematic and ongoing course of conduct with the intent of defrauding Parkwood Lakes HOA by abusing her unique position of treasurer which provided her access to the accounts.

The Manatee County Sheriff's Office has incurred actual costs, as defined in F.S.S. 938.27 and 755.89 in the investigation and preparation for trial.

☐ Misdemeanor $100 or ☒ Felony (non-detailed) $200

☐ Because Defendant is required to register as a sexual offender under s.943.0435, he/she is not eligible for release on bail or surety bond until first appearance. His/her bond amount should therefore be listed as "to be set at first appearance." See Section 903.046(2)(m), Fla.Stat.

☐ Because Defendant is required to register as a sexual predator under s.775.21, he/she is not eligible for release on bail or surety bond until first appearance. His/her bond amount should therefore be listed as "to be set at first appearance." See Section 903.046(2)(m), Fla.Stat

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The defendant, Cassandra Lee Kelley , did commit the above described offenses contrary to Florida Statutes in such case made and provided and against the peace and dignity of the State of Florida.

Det. [signature] 11008014

AFFIANT Det. Randall Walker

Sworn to and subscribed before me this 5th day of August 2026

[signature] Moore 21

NOTARY PUBLIC, STATE OF FLORIDA (F.S.S.117.03)
LAW ENFORCEMENT OFFICER (F.S.S. 117.10)

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