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SAN LUIS OBISPO SUPERIOR COURT

By: A. Lavery,
Deputy Clerk

DAN DOW
DISTRICT ATTORNEY
STATE BAR # 237986
COUNTY OF SAN LUIS OBISPO
COURTHOUSE ANNEX, 4TH FLOOR
SAN LUIS OBISPO, CA 93408
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☐ DV Case
☒ BOOKING REQ

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

vs.

FALLYN SIERRA ROLLINS

DOB: 06/16/1993
ID NO. D000466631
CII: A36753140

Defendant.

COURT CASE NO. 25F-00525

COMPLAINT

DA CASE NO. 079-708501

Appearance Date:

The District Attorney of San Luis Obispo County, California, hereby accuses the
above-named defendant of the following criminal offenses:

Count 1

On or between February 1, 2023 and April 30, 2023, in the County of San Luis Obispo,
State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a
Felony, was committed in that FALLYN SIERRA ROLLINS, while said defendant was an
agent, servant, and employee of the San Luis Obispo County Probation Peace Officers
Association, Inc., did unlawfully take from the San Luis Obispo County Probation Peace

1 Officers Association, Inc., money and personal property which aggregates to a value
2 exceeding Nine Hundred Fifty Dollars (\$950).

3 Count 2

4 On or between May 1, 2023 and June 30, 2023, in the County of San Luis Obispo, State of
5 California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony,
6 was committed in that FALLYN SIERRA ROLLINS, while said defendant was an agent,
7 servant, and employee of the San Luis Obispo County Probation Peace Officers
8 Association, Inc., did unlawfully take from the San Luis Obispo County Probation Peace
9 Officers Association, Inc., money and personal property which aggregates to a value
10 exceeding Nine Hundred Fifty Dollars (\$950).

11 Count 3

12 On or between July 1, 2023 and August 31, 2023, in the County of San Luis Obispo, State
13 of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony,
14 was committed in that FALLYN SIERRA ROLLINS, while said defendant was an agent,
15 servant, and employee of the San Luis Obispo County Probation Peace Officers
16 Association, Inc., did unlawfully take from the San Luis Obispo County Probation Peace
17 Officers Association, Inc., money and personal property which aggregates to a value
18 exceeding Nine Hundred Fifty Dollars (\$950).

19 Count 4

20 On or between September 1, 2023 and October 30, 2023, in the County of San Luis
21 Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of
22 PC487(a), a Felony, was committed in that FALLYN SIERRA ROLLINS, while said
23 defendant was an agent, servant, and employee of the San Luis Obispo County Probation
24 Peace Officers Association, Inc., did unlawfully take from the San Luis Obispo County
25 Probation Peace Officers Association, Inc., money and personal property which aggregates
26 to a value exceeding Nine Hundred Fifty Dollars (\$950).

Count 5

On or between November 1, 2023 and December 31, 2023, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony, was committed in that FALLYN SIERRA ROLLINS, while said defendant was an agent, servant, and employee of the San Luis Obispo County Probation Peace Officers Association, Inc., did unlawfully take from the San Luis Obispo County Probation Peace Officers Association, Inc., money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

Count 6

On or between January 1, 2024 and February 29, 2024, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony, was committed in that FALLYN SIERRA ROLLINS, while said defendant was an agent, servant, and employee of the San Luis Obispo County Probation Peace Officers Association, Inc., did unlawfully take from the San Luis Obispo County Probation Peace Officers Association, Inc., money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

Count 7

On or between March 1, 2024 and April 30, 2024, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony, was committed in that FALLYN SIERRA ROLLINS, while said defendant was an agent, servant, and employee of the San Luis Obispo County Probation Peace Officers Association, Inc., did unlawfully take from the San Luis Obispo County Probation Peace Officers Association, Inc., money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

Count 8

On or between May 1, 2024 and June 30, 2024, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony,

1 was committed in that FALLYN SIERRA ROLLINS, while said defendant was an agent,
2 servant, and employee of the San Luis Obispo County Probation Peace Officers
3 Association, Inc., did unlawfully take from the San Luis Obispo County Probation Peace
4 Officers Association, Inc., money and personal property which aggregates to a value
5 exceeding Nine Hundred Fifty Dollars (\$950).

6 Count 9

7 On or between July 1, 2024 and August 30, 2024, in the County of San Luis Obispo, State
8 of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony,
9 was committed in that FALLYN SIERRA ROLLINS, while said defendant was an agent,
10 servant, and employee of the San Luis Obispo County Probation Peace Officers
11 Association, Inc., did unlawfully take from the San Luis Obispo County Probation Peace
12 Officers Association, Inc., money and personal property which aggregates to a value
13 exceeding Nine Hundred Fifty Dollars (\$950).

14 Enhancement

15 PC186.11(a)(3): Spec Alleg - Aggravated White Collar Crime

16 It is further alleged, pursuant to Penal Code section 186.11(a), that the offenses set forth in
17 Counts One through Nine are related felonies, a material element of which is fraud and
18 embezzlement, which involve a pattern of related felony conduct, and the pattern of related
19 felony conduct involves the taking of more than One Hundred Thousand Dollars
20 (\$100,000).

21
22 It is further alleged pursuant to Penal Code Section 1170(b)(2) that one or more of the
23 following factors in aggravation listed in California Rule of Court 4.421 may apply to the
24 defendant or to conduct of the defendant(s):

25 4.421(a)(3) The victim was particularly vulnerable.
26
27
28

1 4.421(a)(4) The defendant induced others to participate in the commission of the crime
2 and occupied a position of leadership and dominance of other participants in its
3 commission.

4 4.421(a)(6) The defendant threatened witnesses, unlawfully prevented and dissuaded
5 witnesses from testifying, suborned perjury, and in any other way illegally interfered with
6 the judicial process.

7 4.421(a)(7) The defendant is charged with other crimes for which consecutive
8 sentences can be imposed but for which concurrent sentences shall be imposed.

9 4.421(a)(8) The manner in which the crime was carried out indicates planning,
10 sophistication, and professionalism.

11 4.421(a)(9) The crime involved an attempted or actual taking or damage of great
12 monetary value.

13 4.421(a)(11) The defendant took advantage of a position of trust and confidence to
14 commit the offense.

1 All of which is contrary to the statute in such cases made and provided, and
2 against the peace and dignity of the People of the State of California.

3 I declare that an investigation has been conducted to determine if said
4 Defendant(s) did commit the stated crime, which reports are attached hereto and
5 incorporated herein by reference, and that the facts therein show probable cause that
6 the said Defendant(s) did commit the crime. Your declarant requests the issuance of a
7 Warrant of Arrest either if said Defendant(s) do not appear voluntarily in response to an
8 appearance letter, or if no appearance letter was issued.

9 **Discovery Request:** Pursuant to Penal Code Section 1054.5(b), the People are
10 hereby informally requesting that defense counsel provide discovery to the people as
11 required by Penal Code Section 1054.3.

12 On this day January 27, 2025, in the County of San Luis Obispo, I certify and
13 declare under penalty of perjury that the foregoing is true and correct.

14 Dated: January 27, 2025

15 DAN DOW
16 DISTRICT ATTORNEY

17 

18 By:
19 BEN G BLUMENTHAL
20 DEPUTY DISTRICT ATTORNEY

21
22 Upon review of the reports attached and incorporated herein by reference, I find sufficient
23 probable cause to warrant the defendant(s) continued detention.

24 Dated: _____
25 _____ Judge of the Superior Court

SUMMARY PAGE

Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC487(a)		Fallyn Sierra Rollins		
2	PC487(a)		Fallyn Sierra Rollins		
3	PC487(a)		Fallyn Sierra Rollins		
4	PC487(a)		Fallyn Sierra Rollins		
5	PC487(a)		Fallyn Sierra Rollins		
6	PC487(a)		Fallyn Sierra Rollins		
7	PC487(a)		Fallyn Sierra Rollins		
8	PC487(a)		Fallyn Sierra Rollins		
9	PC487(a)		Fallyn Sierra Rollins		
10	PC487(a)		Fallyn Sierra Rollins		
11	PC487(a)		Fallyn Sierra Rollins		
12	PC186.11(a)(3)				