

DA# 2025-00404 Agency: DNSO

Officer: MELLO

ENDORSED  
FILED

JUL 11 2025

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF DEL NORTE

DISTRICT ATTORNEY  
County of Del Norte County  
450 H Street, Room 171  
Crescent City, CA 95531  
(707) 464-7210

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF DEL NORTE

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

vs.

COMPLAINT

WENDY DOREEN MALONE, dob (07/08/1965),  
KAITLIN SMITH, dob (01/23/1998),  
Defendants,

I, the undersigned, state, on information and belief, that defendants did, in Del Norte Judicial District, County of Del Norte, State of California, commit the following crimes:

**COUNT 1.**

**EMBEZZLEMENT BY EMPLOYEE in violation of section PC508, a felony.**

Between August 1, 2023 and April 1, 2025, the Defendant KAITLIN SMITH was a clerk or agent of a business and did fraudulently appropriate property, to wit: money, to her own use, such money coming into her control and care by virtue of her employment as a clerk or agent, and such amount fraudulently appropriated was greater than \$950.00.

**COUNT 2.**

**GRAND THEFT BY EMBEZZLEMENT in violation of section PC487(b)(3), a felony.**

Between August 1, 2023 and April 1, 2025, Defendants WENDY DOREEN MALONE AND KAITLIN SMITH while defendants were an agent, servant, and employee of Wen-Cor, did unlawfully take money, labor, and real and personal property from Wen-Cor which aggregates to a value of nine hundred fifty dollars (\$950) and more in any 12 consecutive month period.

**COUNT 3.**

**FRAUDULENT USE OF ACCESS CARD, in violation of Penal Code Section 484g, a felony**

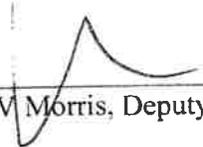
Between August 1, 2023 and April 1, 2025, Defendant KAITLIN SMITH with the intent to defraud did use, for the purpose of obtaining money, goods, services or anything of value, an access card that had been altered, obtained or retained in violation of Penal Code Section 484e, the value of the money, good, or services being in excess of \$950.00.

**COUNT 4.**

**GRAND THEFT BY EMBEZZLEMENT in violation of section PC504, a felony.**

On or about dates August 1, 2023 and April 1, 2025, Defendant WENDY MALONE was an officer, director, trustee, clerk, servant, or agent of an association, society, or corporation, specifically, Partner for Wen-Cor, and, who fraudulently appropriated to a use or purpose not in the due and lawful execution of that trust, property in her possession and/or under her control by virtue of that trust, and/or secreted it with a fraudulent intent to appropriate it. That property had a value exceeding nine hundred fifty dollars (\$950).

I so swear, under penalty of perjury, on July 14, 2025, at Crescent City, California, that the foregoing is true and correct on information and belief.

  
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Keith V Morris, Deputy District Attorney