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By: S. Cuellar, Deputy

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN DIEGO
11

12 **The People of the State of California,**

13 Plaintiff,

14 v.

15 **NEMA YASIN MOHAMED,**
16 **(DOB: 08/10/1992),**

17 Defendant.
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Case No. SCD286672 /AG No.: SD2018102244

SENTENCING MEMORANDUM

[Penal Code §1170(b); Cal. Rule of Court 4.437]

Date: July 13, 2021

Time: ~~8:15 a.m.~~ 1:30pm

Dept: D-1102

Judge: Hon. Laura W. Halgren

TABLE OF CONTENTS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	Page
I. PROCEDURAL BACKGROUND.....	3
<u>Plea Agreement</u>	4
II. SUMMARY OF FACTS.....	4
III. PEOPLE’S POSITION ON SENTENCING.....	12
IV. PROBATION INELIGIBILITY.....	12
V. CRITERIA AFFECTING IMPOSITION OF MANDATORY SUPERVISION..	12
A. <u>Criteria for Denial of Mandatory Supervision</u>	13
VI. CIRCUMSTANCES IN AGGRAVATION.....	14
A. <u>Factors Relating to the Crime</u>	14
B. <u>Factors Relating to the Defendant</u>	15
VII. CONCLUSION.....	16

1 TO DEFENDANT, NEMA YASIN MOHAMED AND HER ATTORNEY, PAMELA G.
2 LACHER, ESQ.; AND TO CESAR ESCURO, INTERIM CHIEF PROBATION OFFICER FOR
3 THE COUNTY OF SAN DIEGO:
4

5 The Plaintiff in this matter, The People of the State of California, by and through their
6 counsel, Rob Bonta, Attorney General of California, and his Deputy, Deputy Attorney General
7 Peter F. Murray, hereby respectfully submits to the Court this Sentencing Memorandum. The
8 People apologize in advance for the length of this brief but the extensive factual background of
9 Ms. MOHAMED's criminal activity required nothing less.

10 I. PROCEDURAL BACKGROUND

11 The Sentencing in this matter follows Ms. MOHAMED'S entry of a guilty plea at the pre-
12 Preliminary Examination Change of Plea Hearing on May 26, 2021.

13 A Felony Complaint was filed on June 17, 2020, charging Ms. MOHAMED with thirty-one
14 (31) felony counts alleging violations of Penal Code §530.5(a) – Identity Theft (4 counts), Penal
15 Code §459/462(a) – First Degree Residential Burglary (7 counts), Penal Code §368(e)(1) – Grand
16 Theft from Elder by Caretaker (5 counts), Penal Code §487(a) – Grand Theft (8 counts), Penal
17 Code §484g – Fraudulent Use of Access Card Information (6 counts), and 1 count of Penal Code
18 §530.5(c)(2) – Identifying Information Theft with Prior. A felony Arrest Warrant was issued by
19 the Honorable Michael T. Smyth, Judge of the San Diego Superior Court, on June 24, 2020
20 setting Bail at \$200,000.00.

21 Ms. MOHAMED was subsequently located in the State of Maryland serving time in
22 incarceration. Extradition proceedings were initiated and upon her release and waiver of formal
23 Extradition, Ms. MOHAMED was turned-over to agents of the California Department of Justice
24 and transported by them to the custody of the San Diego County Sheriff on December 14, 2020.
25 Ms. MOHAMED was arraigned in the San Diego Superior Court on December 23, 2020 and
26 remained in custody on the previously-set \$200,000.00 Bail.
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1 After several agreed-to continuances, Ms. MOHAMED entered into a plea agreement
2 which was accepted by the Honorable Laura W. Halgren, Judge of the Superior Court, on May
3 26, 2021. Sentencing was set for July 13, 2021.

4 Plea Agreement

5 This plea was entered after consultations between counsel for Ms. MOHAMED and the
6 Attorney General's office and several continuances of the original Felony Disposition hearing
7 date. The guilty pleas were to one count of Penal Code §368(e)(1) – Grand Theft from Elder by
8 Caretaker, one count of Penal Code §484g – Fraudulent Use of Access Card Information, one
9 count of Penal Code §487(a) – Grand Theft, and to one count of Penal Code §530.5(c)(2) –
10 Identifying Information Theft with Prior.

11 The terms of the agreement with the Attorney General's office in exchange for Ms.
12 MOHAMED's changes of plea were that the Attorney General would seek no more than 4 years
13 (4-year lid) in "local prison" and would agree to concurrent time with Ms. MOHAMED'S two
14 Probation Revocation cases. Beyond that, the specific Sentence would be left to the discretion of
15 the Court ("sentence to Court").

16 **II. SUMMARY OF FACTS**

17 **[Rule 4.437(c)(1)]**

18 In light of the fact that there were no evidentiary hearings in this matter prior to the plea
19 agreement, the following factual summary is derived primarily from the Arrest Warrant
20 Declaration sworn to, under penalty of perjury, by Special Agent (SA) Sonia Ramos, California
21 Department of Justice (Bureau of Gambling Control, Compliance and Enforcement Section), and
22 filed in this matter. Her Declaration is based on both her own investigation as well as the input of
23 multiple law enforcement agencies, including the California Department of Justice, Division of
24 Medi-Cal Fraud & Elder Abuse (DMFEA), the San Diego Sheriff's Department (SDSD), the San
25 Diego County District Attorney's Office (SDCDA), and the San Diego Police Department
26 (SDPD).

27 During the month of July 2018, the DMFEA received multiple referrals from the SDSD
28 regarding several residents from La Vida Del Mar who had money and checks stolen from their

1 rooms. La Vida Del Mar is an assisted living facility for the elderly. One resident identified an
2 employee by the name of Hayatt YASIN as a possible suspect. Through interviews of facility
3 personnel at La Vida Del Mar, SA Mark Michel, DMFEA, was able to conclude that Nema Yasin
4 MOHAMED had obtained employment using her sister's name, Hayatt YASIN, at La Vida Del
5 Mar. MOHAMED worked at this assisted living facility from May 16, 2018 to June 30, 2018.

6 SA Michel spoke with Hilary Ginter, the director of La Vida Del Mar. Ginter examined the
7 work schedules and realized the thefts began after MOHAMED was authorized to work alone on
8 one floor in the facility. The director advised that all of the fraudulent charges on one of the
9 resident's credit card were made on days that MOHAMED was on days off while working at the
10 facility. Ginter also noted that one of the purchases made with the resident's credit card was for a
11 wig and MOHAMED arrived for work shortly after the purchase wearing a new wig. Ginter
12 claimed to have followed MOHAMED on social media and stated she used the name "Nema
13 Yasin".

14 During the time that MOHAMED worked at La Vida Del Mar, Shirley Yoest, an 86 year-
15 old resident of La Vida Del Mar, filed a crime report with the SDSD after discovering she had
16 \$2,300.00 in cash stolen from her apartment. According to the report, Yoest had the money in a
17 white envelope under a pillow on her bed. Yoest believed the money had been stolen between
18 May 21, 2018 and May 22, 2018.

19 On June 11, 2018, Marilyn Herman, an 85 year-old resident of La Vida Del Mar, filed a
20 crime report with the SDSD regarding the theft of her CitiBank credit card between June 5, 2018
21 and June 6, 2018 from the facility. According to the crime report filed with the SDSD, Gregg
22 Herman (G. Herman), son of Marilyn Herman, takes care of his mother's finances. G. Herman
23 discovered that his mother's credit card had been stolen and multiple fraudulent charges were
24 made totaling around \$1,000.00. G. Herman gave Marilyn Herman's bank statement to the
25 reporting deputy showing multiple fraudulent charges which were made at various locations
26 which were not authorized. One of the purchases made was to a store that sells extensions and
27 wigs.
28

1 SA Joe Oliver, DMFEA, subsequently followed up with SD Salon regarding a fraudulent
2 purchase made with Herman's stolen credit card. SA Oliver confirmed that a fraudulent purchase
3 was made on June 7, 2018 in the amount of \$135.94 for hair products and a curling iron from this
4 store.

5 On June 19, 2018, Ronald Turner, a 93 year-old resident of La Vida Del Mar, filed a crime
6 report with the SDSD after he was notified of two (2) fraudulent checks being drawn against his
7 bank account and made out to the order of "Genaro Diaz" for the sum of \$950.00. Turner
8 indicated the checks were stolen from inside his room at La Vida Del Mar. One of the checks
9 was later negotiated at an ATM and photo surveillance of the transaction was captured. Diaz was
10 subsequently interviewed by SA Oliver and he stated that he had lost his ATM card. However,
11 Diaz was able to identify the individual in the photo as the father of MOHAMED's son.

12 SA Michel spoke with Emily Tittle, who is a registered nurse at La Vida Del Mar. Tittle
13 stated she was working on June 28, 2018 along with MOHAMED. She had left her purse in the
14 medroom. MOHAMED was able to access the medroom on this day. While still at work Tittle
15 received a message from her bank stating that she was overdrawn and her overdraft protection
16 had been activated. She checked her account and saw two attempted charges for \$500.00 and one
17 completed charge for \$1200.00. She determined the \$1200.00 transaction was for Venmo. Tittle
18 stated she did not have a Venmo account nor was she familiar with it.

19 During the month of September 2018, SA Ramos was contacted by the Rincon Band of
20 Luiseño Indians Gaming Commission regarding a possible identity theft investigation. SA Ramos
21 was advised that a person named Nema Yasin MOHAMED had obtained employment at Harrah's
22 Resort Southern California (Harrah's) using the name Hayatt Mohamed YASIN (which SA
23 Ramos later determined to be MOHAMED's sister). Subsequent investigation confirmed that it
24 was in fact MOHAMED who was employed at Harrah's from July 13, 2018 through September
25 22, 2018.

26 MOHAMED's job duties included handling room and cabana reservations over the
27 telephone. During that time, a patron who made reservations with MOHAMED later contacted
28

1 Harrah's to notify them she had noticed unauthorized charges on the credit card she had given for
2 the reservations.

3 During the month of September 2018, Harrah's conducted an investigation in response to
4 the accusation of identity theft. During Harrah's investigative interview, MOHAMED claimed
5 that her name was Hayatt Mohamed YASIN and gave her date of birth as January 26, 1996. She
6 stated she had a sister named "Nema". MOHAMED was asked for her driver's license during the
7 interview but she stated she did not have it with her. Ultimately she refused to provide
8 identification to confirm her identity. An identification card belonging to an elderly woman by
9 the name of Gloria Ruffing was found in MOHAMED's vehicle. MOHAMED stated that her
10 sister was employed as a health care giver and the ID belonged to a lady that her sister used to
11 provide care for. As described below, Ruffing is a resident of La Vida Del Mar and reported the
12 theft of her wallet from her room during the same period that MOHAMED was working at La
13 Vida Del Mar.

14 SA Ramos later reviewed photographs and surveillance video taken of MOHAMED during
15 her investigative interview at Harrah's. SA Ramos was able to identify and confirm that the
16 person who was being interviewed was MOHAMED and not her sister, YASIN, as she claimed to
17 be.

18 On October 4, 2018, SA Michel conducted an interview with Ruffing. Ruffing is a 94 year
19 old resident of La Vida Del Mar facility, who's ID was located in MOHAMED's vehicle at
20 Harrah's resort. She reported that her wallet containing credit cards and \$300.00 in cash was
21 stolen sometime after June 26, 2018. She claimed she last used one of her credit cards on June
22 26, 2018 and discovered on July 1, 2018 that her wallet was not in her purse. Ruffing claimed
23 that she hides her purse in a hidden drawer in her dresser when she is not using it. SA Joe Oliver
24 conducted follow up with Ruffing's family and obtained bank records showing six (6) fraudulent
25 charges on Ruffing's Chase credit card. The charges were conducted between June 29, 2018
26 through August 14, 2018 and amounted to approximately \$1923.34.

27 On January 11, 2019, SA Oliver received two (2) referrals from the SDCDA regarding
28 thefts from Wesley Palms Senior Living (Wesley Palms), an assisted living facility for the

1 elderly. SA Oliver later confirmed that MOHAMED was the employee working at Wesley Palms
2 and that she had used her sister's name, Hayatt YASIN, to obtain employment. It was believed
3 that MOHAMED may have been the suspect in the thefts. MOHAMED only worked at Wesley
4 Palms for approximately 7 or 8 days. During the time she worked there she disappeared from
5 work 2 or 3 times and could not be found.

6 According to the SDCDA reports, Sue Reeves, an 84 year-old resident of Wesley Palms,
7 had her credit card stolen from her room and estimated that \$5,000.00 in fraudulent charges were
8 made during the month of December 2018. The charges were made to several retail stores. It was
9 determined from bank records that Reeves Citibank credit card had twenty-one (21) unauthorized
10 charges ranging from \$6.50 to \$2,101.13 conducted on December 3, 2018 through December 6,
11 2018 for a total amount of \$9,883.53.

12 The SDCDA also referred a report that Elizabeth Flagg, a 95 year-old resident of Wesley
13 Palms, reported that she had her wallet, including \$30.00 in cash and two Charles Schwab debit
14 cards stolen. Flagg also reported there were unauthorized charges on her credit card totaling over
15 \$1,000.00 made to Nordstrom department store.

16 SA Oliver followed up with Macy's, located in Fashion Valley Mall, San Diego, regarding
17 two purchases made on the credit card of victim Sue Reeves on December 5, 2018. SA Oliver
18 was able to obtain copies of the receipt printouts of the two charges. Video surveillance of the
19 transactions were no longer available, however, video surveillance of three subjects that were
20 being monitored while in the store was still available. SA Oliver recognized the female in the
21 video as MOHAMED along with two dark-skinned males.

22 SA Oliver also obtained documentation of the fraudulent charges made with Reeves' and
23 Ruffing's credit cards at Neiman Marcus and Nordstrom, also in Fashion Valley Mall, on
24 December 5, 2018. Surveillance video was no longer available from both of these stores.

25 SA Oliver obtained video surveillance from Footlocker in Fashion Valley Mall. The video
26 included purchases MOHAMED made on December 4, 2018, December 5, 2018 and an
27 attempted purchase on December 6, 2018 and coincided with some of the fraudulent charges on
28

1 victim Reeves' credit card. MOHAMED was observed in the video with the same two males
2 which were observed in the video from Macy's on the same date.

3 CA DOJ Special Agents executed a search warrant at MOHAMED's listed residence.
4 Documents seized included a Harrah's Resort paystub in the name of Hayatt YASIN and a
5 Medicare card in the name of "Gloria Ruffing" which was located in MOHAMED's vehicle.

6 On this same day, SA Oliver and SA Ramos interviewed Hayatt YASIN. YASIN stated
7 that in the past year she has found various ID cards and credit cards in her sister MOHAMED's
8 vehicle. She indicated the credit cards and ID cards did not belong to MOHAMED and were
9 mostly of older ladies.

10 YASIN told us that MOHAMED had asked to use YASIN's ID in the past for the purpose
11 of obtaining a job with Uber and Lyft under YASIN's name. YASIN admitted that MOHAMED
12 was also working under her name at Harrah's Casino. She had asked MOHAMED to stop
13 working jobs under her name. YASIN stated that her father and her family told her to let
14 MOHAMED use her ID to get a job because they knew she would not be able to obtain a job
15 because of her criminal history.

16 YASIN also admitted that MOHAMED had obtained employment at an assisted living
17 facility under her name. In addition, YASIN admitted she took the LiveScan for MOHAMED for
18 the job at La Vida Del Mar. YASIN recalled picking up MOHAMED in Del Mar and her sister
19 was wearing scrubs and a name tag that read "Hayatt".

20 On July 2, 2019, SA Oliver and SA Ramos conducted an in-custody interview with Nema
21 MOHAMED at the Las Colinas Women's Detention and Reentry Facility. MOHAMED was in
22 custody as a result of violating her probation and was arrested for PC1203.2(a) - Probation
23 Violation. MOHAMED had previously been sentenced to five years probation after being
24 convicted of PC530.5(c)(3) - Felony Identity Theft (San Diego Court case # SCD272997) and
25 PC368(d) - Felony Financial Elder Abuse and PC484e(c) - Felony Fraudulent Use of Access Card
26 Information (San Diego Court case #SCD267998). During the interview, MOHAMED admitted
27 she worked for Harrah's Casino around August/September of 2018 under her sister, Hayatt
28 YASIN's, name. She admitted to using YASIN's name, date of birth and social security number

1 to apply for the job. MOHAMED also admitted that YASIN took the LiveScan for her. She said
2 she forced YASIN to do the LiveScan and admitted to threatening to fight YASIN if she did not
3 do it for her. MOHAMED stated the LiveScan was on Harrah's property and recalled driving
4 YASIN to take the LiveScan for her. She said her job at Harrah's required her to answer phone
5 calls and book cabanas. MOHAMED said patrons would call and give her their credit card
6 number, she admitted to writing the information down on "sticky notes".

7 MOHAMED also admitted she used Hayatt YASIN's name to obtain employment at
8 Wesley Palms and La Vida Del Mar assisted living facilities. Again, she said she threatened
9 YASIN if she did not do the LiveScan for her.

10 MOHAMED also admitted to stealing the ID belonging to Gloria RUFFING, along with
11 other people's IDs, credit cards and cash. She admitted to stealing between 10 and 20 credit cards
12 while she was working. She admitted to buying clothing, shoes, purses and electronics with the
13 stolen credit cards from retail stores including Nordstrom, Neiman Marcus, Footlocker, Best Buy
14 and the Apple store.

15 Subsequently, CA DOJ Special Agents executed a search warrant at MOHAMED's storage
16 unit. Multiple items were seized including a notebook containing several handwritten "Post It"
17 notes. The "Post It" notes and some of the pages within the notebook had personal identifying
18 information (PII) including names, addresses, phone numbers and credit card number
19 information.

20 SA Ramos believed the PII contained in the notebook belonged to individuals who had
21 called Harrah's Resort to make reservations. SA Oliver and SA Ramos were able to identify and
22 locate some of those subjects whose information was found in MOHAMED's storage locker for
23 an interview.

24 SA Ramos spoke with LaVida Octavia Nunez who confirmed that on September 10, 2018,
25 she made a telephone reservation for a cabana with Harrah's Resort. The reservation was
26 completed by an employee who identified herself as Hayatt YASIN. She stated that an
27 unauthorized credit card transaction for \$489.00 had been attempted at Best Buy on the same day
28 that she had called to make the reservation. She also received information that an unauthorized

1 account had been opened under her name and social security number with AT&T in December of
2 2018.

3 All the other subjects whose PII was found in MOHAMED's notebook and who were
4 interviewed, confirmed that they had either made a phone reservation to stay at Harrah's Resort
5 or rent a cabana during the month of September 2018. These individuals did not give anyone
6 permission to use their personal identifying information or credit card number.

7 Finally, in January 2020, the SDPD conducted an investigation wherein MOHAMED is
8 alleged to have performed a hot prowl burglary of the residence of a patron for whom
9 MOHAMED had provided a Lyft ride. According to the SDPD reports, in the early morning
10 hours of January 07, 2020, victim Charles Burgess utilized the Lyft rideshare service. The victim
11 was highly intoxicated and invited the female driver into his residence. The victim passed-out
12 shortly thereafter but later awoke to discover property, electronics, credit cards and IDs in an
13 amount of over \$10,000.00 to be missing.

14 A review of the victim's RING surveillance camera captured a female entering and exiting
15 the residence multiple times carrying-away armfuls of property. Later that same day, numerous
16 unauthorized transactions utilizing multiple different credit cards belonging to the victim were
17 conducted at various retail establishments.

18 Some of the stolen electronics were tracked to a location where a vehicle was located and
19 which contained victim's property as well as some of his credit cards. The vehicle was
20 determined to belong to MOHAMED and contained her driver's license. MOHAMED was also
21 identified as the Lyft driver utilizing victim's screenshot of his driver. Additionally, MOHAMED
22 was identified through surveillance video footage as the person making unauthorized charges on
23 the victim's credit cards.

24 MOHAMED failed to appear at a scheduled San Diego County Probation appointment in
25 April, 2020 and at that time, her whereabouts were unknown.

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III. PEOPLE’S POSITION ON SENTENCING

The People’s position with respect to Ms. MOHAMED’s Sentence is that the Court should deny Probation and order a full 4-years in the custody of the San Diego County Sheriff ((local prison) with no Mandatory Supervision tail (no split time). Even at that, it is clear that Ms. MOHAMED will receive a discount on her Sentence compared to what she might have received if she were to have gone forward with this case. Her early acceptance of responsibility by entering her guilty pleas warrants that discount. It is suggested that the 4-year term be reached by imposing the upper term for the plea to Count 15 – Penal Code §368(e)(1): Grand Theft from Elder by Caretaker, and then imposing concurrent time for the remaining three pled-to Counts as well as for BOTH Probation Revocation cases. The basis of the People’s position is supported by the following.

IV. PROBATION INELIGIBILITY
[Rule 4.413; PC§1203(e)(4)]

Ms. MOHAMED is presumptively INELIGIBLE for Probation per Penal Code §1203(e)(4) given her felony conviction priors, which are before this Court for Revocation proceedings. (San Diego Superior Court case # SCD272997; San Diego Superior Court case #SCD267998). As such, this Court shall not grant Probation to Ms. MOHAMED unless this Court finds that Ms. MOHAMED represents an “unusual case[] in which the interests of justice would best be served if [she] is granted probation”. (Penal Code §1203(e)(4))

A. Factors that Might Overcome Presumptive Probation Ineligibility
[Rule 4.413(c)]

The People submit that none of the enumerated factors in Rule 4.413(c) are met and thus the Presumptive Probation Ineligibility cannot be overcome.

V. CRITERIA AFFECTING IMPOSITION OF MANDATORY SUPERVISION
[Rule 4.415; PC§1170(h)]

Ms. MOHAMED is statutorily eligible for Mandatory Supervision. (Penal Code §1170(h)(5)(A)) However, it is the People’s position that the “interests of justice” militate against any such period of Mandatory Supervision for Ms. MOHAMED.

1 A. Criteria for Denial of Mandatory Supervision

2 [Rule 4.415(b)]

3 (1) Ms. MOHAMED has over 365 days of custody credit (estimated actual
4 custodial days and PC4019 credits) as of this Sentencing date. Even if the Court
5 imposes the People's recommended 4-year term, any split will leave both little
6 custody exposure remaining while also leaving a relatively minimum period of
7 Mandatory Supervision.

8 (2) Defendant is currently on Probation, ON TWO CASES, and has failed
9 demonstrably in her grants of Probation by continuing to commit similar felony
10 crimes of increasing severity. Any suggestion that she could benefit from Mandatory
11 Supervision ignores her clear history which evidences a disdain for the probationary
12 regime. Ms. MOHAMED's consistent history makes clear that Mandatory
13 Supervision would be a waste of time, energy and resources of both the Probation
14 Department as well as of the Court.

15 (3) Nothing in Ms. MOHAMED's history suggest that she could benefit from
16 either treatment or supervision. Rather, Ms. MOHAMED has shown herself to be
17 utterly unamenable to the services provided by the Probation Department for
18 treatment and/or supervision.

19 (4) Both the nature, seriousness, and circumstances of Ms. MOHAMED's current
20 case (31 counts against 10 victims, almost all of whom are aged and vulnerable) as
21 well as Ms. MOHAMED's past performance on supervision (utter failure),
22 substantially outweigh any hypothetical benefits of supervision in her case. To
23 release Ms. MOHAMED under a Mandatory Supervision grant would not promote
24 public safety but rather would represent a threat to it. And Ms. MOHAMED's past
25 probationary performance makes clear that any Supervision has no effect with respect
26 to her successful reentry into the community. Ms. MOHAMED continues to commit
27 crimes and victimize vulnerable citizens even when she IS being supervised.

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1 VI. CIRCUMSTANCES IN AGGRAVATION

2 [Rule 4.421]

3 Recognizing both the inherent discretion of the Court and the fact that the plea agreement
4 herein contemplates a “Sentence to the Court”, the People address the following factors in
5 aggravation to support their recommendation for a full 4-year term to be imposed.

6 A. Factors Relating to the Crime

7 (1) The facts make clear that Ms. MOHAMED’s actions throughout all of these
8 crimes were the height of callousness. In every instance, she took advantage of a
9 position of trust to victimize vulnerable victims. Most of the ten victims of course
10 were significantly-aged residents of elder living facilities. These are folks who rely
11 on persons in the position that Ms. MOHAMED had defrauded herself into. Their
12 sense of comfort and security are directly tied to the compassionate work of their
13 caregivers. Ms. MOHAMED turned that into a farce by blatantly stealing from them.
14 Perhaps the most glaring factual example of Ms. MOHAMED’s true intentions is the
15 fact that she “worked” at Wesley Palms Senior Living for barely a week and in that
16 short time was stealing from the elderly residents. Ms. MOHAMED wasn’t looking
17 for a job when she defrauded her way into these positions, she was looking for her
18 next score.

19 (3) As noted in the above paragraph, almost all of Ms. MOHAMED’s ten victims
20 were extremely vulnerable: aged and infirm, and, in the last incident, blindly drunk.

21 (4) Ms. MOHAMED was a criminal bully to her innocent sister in the way she
22 obtained her cooperation to defraud the various employers into hiring her. Ms.
23 MOHAMED threatened to physically assault her sister and in so doing made her
24 sister liable for criminal activity.

25 (7) Ms. MOHAMED pled to only 4 counts out of 31. She faced a maximum
26 exposure on just those 4 counts of 6 years. Her 4-year term could be obtained by
27 imposing the upper term on just one count of Penal Code §368. By running the other
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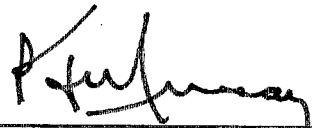
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VII. CONCLUSION

For all of the above-stated reasons along with the additional information/input that the Court may consider at the sentencing hearing on this matter, the People of the State of California respectfully request that the Court deny Probation to Ms. MOHAMED and commit her into the custody of the Sheriff for a full 4-year term (local prison) with no Mandatory Supervision tail.

Dated: July 8, 2021

Respectfully Submitted,
ROB BONTA
Attorney General of California



PETER F. MURRAY
Deputy Attorney General
Attorneys for Plaintiff
State of California

SD2018102244