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Filed **DEC 04 2017**  
ROSA JUNQUEIRO, CLERK  
GEORGETTE HUTCHINGS  
By \_\_\_\_\_  
DEPUTY

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 IN AND FOR THE COUNTY OF SAN JOAQUIN  
11 CRIMINAL DIVISION

13 **PEOPLE OF THE STATE OF**  
14 **CALIFORNIA,**

15 Plaintiff,

16 v.

17 **YEHLLEN DOROTHEA BROOKS,**

18 Defendant.

Case No. CR-2016-14373

**STIPULATED PLEA AGREEMENT**

Date: December 4, 2017  
Time: 8:30  
Dept: 8B  
Judge: The Honorable Ronald Northrup

20 In order to resolve the charges against her, Defendant BROOKS, represented by and  
21 through her attorney of record, Deputy Public Defender Adam Grace, agrees as follows:

22 1. Starting as early as 2003 and continuing until 2017, Defendant operated an  
23 immigration law practice in Stockton, California. Defendant used the law practice to defraud  
24 unsuspecting and vulnerable immigrant victims, who sought her out for help. Defendant  
25 promised the victims named in this case, as well as others, that she would represent them in  
26 immigration matters and protect them from deportation. Instead, Defendant collected fees from  
27 the victims ranging from \$3,000 to over \$16,000 and did little or no work on the victims' behalf.  
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1 The victims trusted the Defendant and in some instances, gave her their last dollar. Defendant  
 2 took advantage of that trust and even threatened victims that if they did not continue to pay her,  
 3 they would be deported. Meanwhile, victims who did pay her based on her assurances to the  
 4 contrary, were detained and deported. She also lied to victims about the status of their cases and  
 5 claimed to have filed court documents on their behalf, when in fact she had not. This prevented  
 6 victims from seeking alternative help or discovering that they had been scammed, thus enabling  
 7 Defendant to continue to perpetuate the fraud. In March 2015, Defendant was disbarred by the  
 8 Kansas State Bar where she had initially been licensed to practice law. Despite losing her license,  
 9 Defendant continued her fraudulent law practice, failing to disclose that she was no longer an  
 10 attorney, and collecting fees from additional victims for legal work she never intended to  
 11 perform. Specifically, Defendant made false promises and deceived the following victims in San  
 12 Joaquin County, during the time periods listed below, in order to fraudulently obtain money from  
 13 the victims in the amounts listed below:

COUNT	DATE	VICTIM	AMOUNT
1	November 9, 2014- January 25, 2016	Marcela Lopez	\$12,000
2	July 10 2010-November 8, 2014	Citlalli Padilla	\$11,628
3	October 28, 2012	Maribel Cornejo	\$3,000
4	April 10, 2012-January 27 2014	Erica Villasenor	\$7,880
5	September 12, 2012	Elizabeth Dickinson	\$6,000
6	September 27 2012-March 18 2014	Jane Martinez	\$4,170
7	July 19, 2012-August 16, 2013	Sonjia Ramirez	\$8,140
8	April 1, 2012-June 17, 2013	Anabely Sheel	\$3,785
9	April 16, 2018-August 31, 2014	Hilda Albor	\$5,475
10	March 31, 2003	Jose Munoz	\$8,000
11	May 6, 2013-March 6, 2014	Jesus and Griselda Estrada	\$7,775
12	August 13, 2013-December 13, 2014	Jorge Flores	\$8,075
13	March 25, 2013-June 30, 2014	Stephany and Gabriel Lopez	\$4,675
14	August 14, 2006-May 31, 2007	Caeser Trujillo Silva and Julia Villalobos	\$16,500
21	June 3, 2016-May 3, 2016	Oscar and Blanca Casteneda	\$9,000

1           2. Defendant will plead guilty to counts 1 through 14 and count 21 as filed in the  
2 complaint and listed above. This consists of 15 counts of felony grand theft.

3           3. Defendant agrees to pay full restitution to the 15 named victims (\$23,925  
4 outstanding), to reimburse the Kansas State Bar for all funds distributed through the Bar's trust  
5 fund program based on claims against Defendant (\$297,784) and to pay the California Rural  
6 Legal Assistance Foundation and U.C. Davis Immigration Law Clinic (\$50,000) for their  
7 continued efforts to assist the victims, for a total of \$371,709 to be distributed in the manner  
8 described on the attached restitution orders.

9           4. The People agree to dismiss all remaining counts and enhancements. This is a global  
10 settlement for all criminal conduct related to Defendant's law practice.

11           5. If approved by the Court, the Defendant will be sentenced to a term of 5 years as  
12 follows:

- 13           • Upper term of three years on count 1, with a consecutive term of 8 months on  
14 counts 2-4 with all remaining counts to be run concurrently.
- 15           • The 5-year term will be served locally in accordance with Penal Code section  
16 1170(h) and be split as a 3-year period of confinement followed by a 2-year period  
17 of community supervision.
- 18           • The parties stipulate, and the Court orders, that Defendant receives actual time  
19 credit pursuant to Penal Code section 2900.5 and good time/work time credit  
20 pursuant to Penal Code section 4019 credits for the time she served on electronic  
21 monitoring from the date the monitor was placed on her through date of  
22 sentencing.

23           6. Defendant agrees to turn over all client files to the State Bar of California or Attorney  
24 General's Office to be returned to clients. If clients cannot be located within 3 years of this order,  
25 files may be destroyed. The Attorney General will not retain these files for any purpose other  
26 than to return them to the clients.

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7. Defendant agrees, if asked, to debrief or participate in a recorded interview that could be used for informational purposes.

8. Defendant understands that if she willfully fails to make restitution payments, willfully fails to turn over client files, or otherwise willfully violates the terms of this agreement, she may be sentenced to an additional period of incarceration.

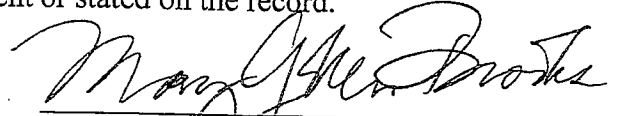
9. Defendant agrees and acknowledges that she waives any and all appellate rights in exchange for this plea agreement.

10. Defendant understands that she has a right to a preliminary hearing, and at such hearing she has the right to confront and cross-examine witnesses against her, subpoena and call witnesses in her defense and challenge the evidence against her. Defendant further understands that she has a right to trial by jury where she has the right to confront and cross-examine witnesses against her, subpoena and call witnesses in her defense and challenge the evidence against her. Defendant understands that by pleading guilty to the charges against her, she gives up and waives her right to a preliminary hearing and waives her right to a jury trial.


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1 11. Defendant has not been coerced or forced to plead guilty to these charges. Defendant  
2 acknowledges that she has had the opportunity to meet and confer with her lawyer, Deputy Public  
3 Defender Adam Grace, and discuss the evidence against her. She further agrees that any  
4 promises made are incorporated into this agreement or stated on the record.

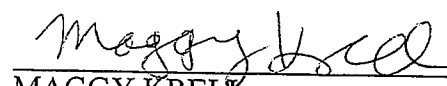
5  
6 Dated: December 4, 2017

  
DEFENDANT MARY YEHLEN BROOKS  
aka Yehlen Dorothea Brooks

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8  
9 Dated: December 4, 2017

  
ADAM GRACE  
Deputy Public Defender  
Attorney for Defendant

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11  
12 Dated: December 4, 2017

  
MAGGY KRELY  
Supervising Deputy Attorney General  
Attorney for the People of the State of  
California

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16 STIPULATION SO APPROVED. The above stipulation will be incorporated into the record, and  
17 its term made a part of, or considered by, any probationary order.

18  
19 Dated: December 4, 2017

**RON A. NORTHUP**  
\_\_\_\_\_  
JUDGE OF THE SUPERIOR COURT

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