

1 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

2 BRANCH

3 The People of the State of California, )  
4 Plaintiff, )  
5 v. )  
6 YEHLEN DOROTHEA BROOKS )  
7 aka MARY BROOKS )  
8 Defendant(s). )

CT No. **CR-2016-14373**  
CASE  
ARREST WARRANT

9 THE PEOPLE OF THE STATE OF CALIFORNIA  
10 TO ANY PEACE OFFICER IN THIS STATE:

11 Complaint on oath having this day been made before me that the  
12 crime of:

- 13 COUNT 1: PC 487(a), GRAND THEFT, a Felony
- 14 COUNT 2: PC 487(a), GRAND THEFT, a Felony
- 15 COUNT 3: PC 487(a), GRAND THEFT, a Felony
- 16 COUNT 4: PC 487(a), GRAND THEFT, a Felony
- 17 COUNT 5: PC 487(a), GRAND THEFT, a Felony
- 18 COUNT 6: PC 487(a), GRAND THEFT, a Felony
- 19 COUNT 7: PC 487(a), GRAND THEFT, a Felony
- 20 COUNT 8: PC 487(a), GRAND THEFT, a Felony
- 21 COUNT 9: PC 487(a), GRAND THEFT, a Felony
- 22 COUNT 10: PC 487(a), GRAND THEFT, a Felony
- 23 COUNT 11: PC 487(a), GRAND THEFT, a Felony
- 24 COUNT 12: PC 487(a), GRAND THEFT, a Felony
- 25 COUNT 13: PC 487(a), GRAND THEFT, a Felony
- 26 COUNT 14: PC 487(a), GRAND THEFT, a Felony
- 27 COUNT 15: PC 470(b), FORGERY, a Felony
- 28 COUNT 16: PC 470(d), FORGERY, a Felony
- 29 COUNT 17: BP 6126(a), UNLICENSED PRACTICE OF LAW, a Misdemeanor
- 30 COUNT 18: BP 6126(a), UNLICENSED PRACTICE OF LAW, a Misdemeanor
- 31 COUNT 19: PC 528.5(a), ELECTRONIC IMPERSONATION, a Misdemeanor
- 32 COUNT 20: PC 528.5(a), ELECTRONIC IMPERSONATION, a Misdemeanor

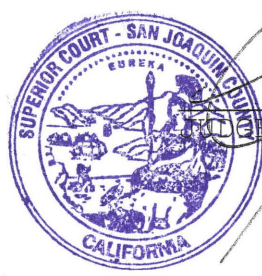
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SUPERIOR COURT - STOCKTON  
2016 OCT 26 PM 2:49  
ROSA JUNQUEIRO, CLERK  
BY KELLY LY  
DEPUTY

23 has/have been committed and accusing defendant thereof, YOU ARE  
24 THEREFORE COMMANDED forthwith to arrest the above-named defendant  
25 and bring him before the above court, or in case of my absence or  
26 inability to act, before the nearest or most accessible magistrate  
27 in this county.

1 Defendant is to (\$300,000.00) Bail  
be admitted to bail (\$ Penalty Assessment  
2 in the sum of ----- (\$300,000.00) Total Bail

3 DEFENDANT ( ) MAY OR (✓) MAY NOT BE RELEASED ON SIGNED PROMISE TO  
4 APPEAR (§§ 818/853.6 PC)

5 Witness my hand and the seal of said Court, this 26<sup>th</sup> day of  
6 October 2016



Judge's signature  
(Seal)  
JUDGE OF THE SUPERIOR COURT

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Handwritten initials

1 KAMALA D. HARRIS  
Attorney General of California  
2 JIM ROOT  
Senior Assistant Attorney General  
3 MAGGY KRELL  
Supervising Deputy Attorney General  
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8 *Attorneys for the People of the State of California*

FILED  
SUPERIOR COURT STOCKTON  
2016 OCT 26 PM 2:46  
ROSA JUNQUEIRO, CLERK  
BY KELLY LY  
DEPUTY

9  
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF SAN JOAQUIN  
12

13 THE PEOPLE OF THE STATE OF  
14 CALIFORNIA,

15 Plaintiff

16 V.

17 YEHLLEN DOROTHEA BROOKS  
18 aka MARY BROOKS,

19 DEFENDANT

Case No. *CR-2016-14373*

FELONY COMPLAINT

Date:  
Time:  
Dept:  
Judge:  
Trial Date:  
Action Filed:

20 The Attorney General of the State of California accuses the above-named defendant of the  
21 following offenses, which are connected to each other in their commission:

22 COUNT 1

23 On and between November 9, 2014, and January 25, 2016, in the County of San Joaquin  
24 County, the crime of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony,  
25 was committed by defendant MARY BROOKS, who did unlawfully take money and personal  
26 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit \$12,000, the property of  
27 victim Marcela Lopez.  
28

1 COUNT 2

2 On and between July 10, 2010, and November 8, 2014, in the County of San Joaquin, the  
3 crime of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was  
4 committed by defendant MARY BROOKS, who did unlawfully take money and personal  
5 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit \$11,628, the property of  
6 victim Citlalli Padilla.

7 COUNT 3

8 On or around October 28, 2012, in the County of San Joaquin, the crime of **GRAND**  
9 **THEFT**, a violation of PENAL CODE section 487(a), a Felony, was committed by defendant  
10 MARY BROOKS, who did unlawfully take money and personal property of a value exceeding  
11 Nine Hundred Fifty Dollars (\$950), to wit \$3,000, the property of victim Maribel Cornejo.

12 COUNT 4

13 On and between April 10, 2012, and January 27, 2014, in the County of San Joaquin, the  
14 crime of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was  
15 committed by defendant MARY BROOKS, who did unlawfully take money and personal  
16 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit \$7,880, the property of  
17 victim Erica Villasenor.

18 COUNT 5

19 On or around September 12, 2012, in the County of San Joaquin, the crime of **GRAND**  
20 **THEFT**, a violation of PENAL CODE section 487(a), a Felony, was committed by defendant  
21 MARY BROOKS, who did unlawfully take money and personal property of a value exceeding  
22 Nine Hundred Fifty Dollars (\$950), to wit \$6,000, the property of victim Elizabeth Dickinson.

23 COUNT 6

24 On and between September 27, 2012, and March 18, 2014, in the County of San Joaquin,  
25 the crime of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was  
26 committed by defendant MARY BROOKS, who did unlawfully take money and personal  
27 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit \$4,170, the property of  
28 victim Jane Martinez.

1 COUNT 7

2 On and between July 19, 2012, and August 16, 2013, in the County of San Joaquin, the  
3 crime of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was  
4 committed by defendant MARY BROOKS, who did unlawfully take money and personal  
5 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit \$8,140, the property of  
6 victim Sonjia Ramirez.

7 COUNT 8

8 On and between April of 2012, and June 17, 2013, in the County of San Joaquin, the crime  
9 of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was committed by  
10 defendant MARY BROOKS, who did unlawfully take money and personal property of a value  
11 exceeding Nine Hundred Fifty Dollars (\$950), to wit \$3,785, the property of victim Anabely  
12 Sheel.

13 COUNT 9

14 On and between April 16, 2008, and August 2014, in the County of San Joaquin, the crime  
15 of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was committed by  
16 defendant MARY BROOKS, who did unlawfully take money and personal property of a value  
17 exceeding Nine Hundred Fifty Dollars (\$950), to wit \$5,475, the property of victim Hilda Albor.

18 COUNT 10

19 On and about March 31, 2003, in the County of San Joaquin, the crime of **GRAND**  
20 **THEFT**, a violation of PENAL CODE section 487(a), a Felony, was committed by defendant  
21 MARY BROOKS, who did unlawfully take money and personal property of a value exceeding  
22 Nine Hundred Fifty Dollars (\$950), to wit \$8,000, the property of victim Jose Munoz.

23 COUNT 11

24 On and between May 6, 2013 and March 6, 2014, in the County of San Joaquin, the crime  
25 of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was committed by  
26 defendant MARY BROOKS, who did unlawfully take money and personal property of a value  
27 exceeding Nine Hundred Fifty Dollars (\$950), to wit \$7,775, the property of victim Jesus and  
28 Griselda Estrada.

1 COUNT 12

2 On and between August 13, 2013 and December 13, 2014, in the County of San Joaquin,  
3 the crime of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was  
4 committed by defendant MARY BROOKS, who did unlawfully take money and personal  
5 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit \$8,075, the property of  
6 victim Jorge Flores.

7 COUNT 13

8 On and between March 25, 2013 and June 30, 2014, in the County of San Joaquin, the  
9 crime of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was  
10 committed by defendant MARY BROOKS, who did unlawfully take money and personal  
11 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit \$4,675, the property of  
12 victim Stephany and Gabriel Lopez.

13 COUNT 14

14 On and between August 14, 2006, and May 2007, in the County of San Joaquin, the crime  
15 of **GRAND THEFT**, a violation of PENAL CODE section 487(a), a Felony, was committed by  
16 defendant MARY BROOKS, who did unlawfully take money and personal property of a value  
17 exceeding Nine Hundred Fifty Dollars (\$950), to wit \$16,500, the property of victim Caesar  
18 Trujillo Silva and Julia Villalobos.

19 COUNT 15

20 On or about September 30, 2014, in the County of San Joaquin, the crime of **FORGERY**, a  
21 violation of PENAL CODE section 470(b), a Felony, was committed by defendant MARY  
22 BROOKS, a person who, with the intent to defraud, counterfeited the seal or handwriting of  
23 another, to wit, the file stamp of the Department of Justice Executive Office of Immigration  
24 Review.

25 ///

26 ///

27 ///

28 ///

1 COUNT 16

2 On or about June 16, 2015, in the County of San Joaquin, the crime of **FORGERY**, a  
3 violation of PENAL CODE section 470(d), a Felony, was committed by defendant MARY  
4 BROOKS, a person who, with the intent to defraud, counterfeited or altered a cashier's check, to  
5 wit, a CHASE cashier's check made to "DEPARMENT OF HOMELAND SECURITY" [sic].

6 COUNT 17

7 On or about April 2015, in the County of San Joaquin, the crime of **UNLICENSED**  
8 **PRACTICE OF LAW**, a violation of BUSINESS and PROFESSIONS CODE section 6126(a), a  
9 Misdemeanor, was committed by defendant MARY BROOKS, a person who was not an active  
10 member of the State Bar of the State of California and who was not otherwise authorized pursuant  
11 to a statute or court rule, and who did unlawfully hold herself out as practicing and entitled to  
12 practice law to victim Marcela Lopez.

13 COUNT 18

14 On or about June 16, 2015, in the County of San Joaquin, the crime of **UNLICENSED**  
15 **PRACTICE OF LAW**, a violation of BUSINESS and PROFESSIONS CODE section 6126(a), a  
16 Misdemeanor, was committed by defendant MARY BROOKS, a person who was not an active  
17 member of the State Bar of the State of California and who was not otherwise authorized pursuant  
18 to a statute or court rule, and who did unlawfully hold herself out as practicing and entitled to  
19 practice law to victim Citlalli Padilla.

20 COUNT 19

21 On or about January 27, 2015, in the County of San Joaquin, the crime of **ELECTRONIC**  
22 **IMPERSONATION** a violation of PENAL CODE section 528.5(a), a Misdemeanor, was  
23 committed by defendant MARY BROOKS, a person who did unlawfully, knowingly, and without  
24 consent credibly impersonate another actual person by electronic means for purposes of  
25 defrauding another person, to wit, Mario and Jane Martinez.

26 COUNT 20

27 On or about January 30, 2015, in the County of San Joaquin, the crime of **ELECTRONIC**  
28 **IMPERSONATION** a violation of PENAL CODE section 528.5(a), a Misdemeanor, was

1 committed by defendant MARY BROOKS, a person who did unlawfully, knowingly, and without  
2 consent credibly impersonate another actual person by electronic means for purposes of  
3 defrauding another person, to wit, Stephany and Gabriel Martinez.

#### 4 **FIRST SPECIAL ALLEGATION**

##### 5 **Statute of Limitations – Discovery Within Four Years (Penal Code, §§ 801.5, 803(c))**

6 As detailed below, the victims alleged in this complaint, as well as law enforcement  
7 officials, discovered the crimes alleged within four years of the filing of this complaint. (Pen.  
8 Code, § 803, subd. (c).)

#### 9 **1. Background Facts**

10 Defendant Mary Brooks practiced federal immigration law out of various offices in San  
11 Joaquin County between the years relevant to this case of 2011 through 2015. During this time,  
12 Defendant would meet with a client for an initial consultation and either take a lump sum up front  
13 or allow the client to make payments. Inherent in this type of fraud was the fact that the process  
14 of immigration is a lengthy one, thus all of Defendant's clients could not have suspected they  
15 were being defrauded until a significant time period had elapsed.

16 Defendant would nominally communicate with clients often to assure their continued  
17 payment. In some cases, Defendant falsified documents in order to continue the ruse. Thus,  
18 clients had no way of learning that the Defendant was not performing as promised. In some  
19 cases, her clients first learned from immigration authorities that they never even had a case file  
20 open, because nothing had been submitted by Defendant.

#### 21 **2. Victim Discovery**

##### 22 *Count 2*

23 Between July 10, 2010, and November 8, 2014, Defendant took approximately \$11,628  
24 from Ms. Citlalli Padilla. Ms. Padilla did not discover her loss until March of 2015 after watching  
25 a news story about how Defendant had been disbarred. Ms. Padilla did not discover the fraud  
26 before then because she believed that Defendant was working on her case. Ms. Padilla had  
27 difficulty contacting Defendant, and when she did get ahold of her, Defendant gave excuses as to  
28 why nothing was done on the case, or would lie that the case was progressing. At one point,



1 Defendant produced a forged check to show Defendant had sent a form to Immigration  
2 authorities. November 8, 2014 was the last time Ms. Padilla gave Defendant money, a \$670  
3 money order for an application fee. The application was never sent to the Department of  
4 Homeland Security.

5 *Count 3*

6 On or around October 28, 2012, Defendant took approximately \$3,000 from Ms. Maribel  
7 Cornejo. Ms. Cornejo discovered her loss after watching a news story regarding Defendant in  
8 January of 2013. Defendant continuously ignored Ms. Cornejo and would put off meeting her.  
9 This victim determined early on that she had suffered a loss, but her loss in January 2013, is still  
10 within the statute of limitations and she could not have known any sooner.

11 *Count 4*

12 Between April 10, 2012, and January 27, 2014, Defendant took \$7,880 in installment  
13 payments from Ms. Erica Villasenor. Ms. Villasenor did not discover her loss until July of 2014  
14 when she went to another immigration attorney and learned from the attorney that Defendant had  
15 never filed any paperwork on Ms. Villasenor's behalf. Ms. Villasenor did not discover the fraud  
16 sooner because Defendant told Ms. Villasenor that the immigration judge was not available (a  
17 lie), that Defendant was ill, or that Defendant was in fact filing the correct paperwork. The last  
18 time Ms. Villasenor paid Defendant for services was January 27, 2014, for \$380 to process  
19 paperwork. Nothing was ever submitted to the Department of Homeland Security.

20 *Count 5*

21 On or around September 12, 2012, Defendant took \$6,000 from Ms. Emily Dickinson to  
22 handle her brother, Efron Tavizon's immigration case. Ms. Dickinson discovered her loss in June  
23 of 2014 when she showed up to Defendant's office and found out it was no longer there. Ms.  
24 Dickinson did not discover her loss earlier because when Ms. Dickinson requested updates,  
25 Defendant was nearly impossible to get ahold of. Ms. Dickinson's sister impersonated a new  
26 client in order to have a sustained phone conversation with Defendant's secretary, just to be hung  
27 up on when the secretary found out it was an existing client's case. Defendant remained elusive  
28

1 and gave no definitive reason why work had not been done on Efron's case. Ms. Dickinson  
2 realized she had been defrauded when she could no longer locate Defendant in June 2014.

3 *Count 6*

4 Between September 27, 2012, and March 18, 2014, Defendant took \$4,170 from Ms. Jane  
5 Martinez. Ms. Martinez discovered her loss on January 10, 2015, when she realized Defendant  
6 would not return her file or refund any money despite repeated promises by Defendant to do so.  
7 Ms. Martinez did not discover the fraud earlier because Defendant gave multiple excuses  
8 regarding her health, going as far as to impersonate her sister via email in an attempt to postpone  
9 delivering Ms. Martinez's file and refund. The last time Ms. Martinez paid Defendant for services  
10 was March 18, 2014, for \$670 for a filing fee. Nothing was ever filed with the Department of  
11 Homeland Security.

12 *Count 7*

13 Between July 19, 2012, and August 16, 2013, Defendant took \$8,140 from Ms. Sonjia  
14 Ramirez to handle immigration proceedings for her husband, Alvaro Jauregui. Ms. Ramirez  
15 discovered her loss in March of 2014 when they demanded their money back because they lost  
16 faith that Defendant was doing anything on their case. They subsequently met with a new  
17 attorney and discovered no paperwork had been submitted by Defendant. They did not discover  
18 their loss sooner because after hiring Defendant, like all her clients, they believed that Defendant  
19 was working on their case. They could not get ahold of Defendant, and when they did, Defendant  
20 would lie that paperwork was submitted and being processed. She would then find another reason  
21 for the victims to give more money.

22 *Count 8*

23 Between April of 2012, and June 17, 2013, Defendant took approximately \$3,785 from  
24 Anabely Sheel. Ms. Sheel discovered her loss in May of 2014 when, after confirming with the  
25 Department of Homeland Security that her paperwork was never submitted by Defendant. Ms.  
26 Sheel did not discover the fraud earlier because she believed her case was being processed by  
27 Defendant, but became suspicious when she could not get ahold of Defendant after repeated  
28 requests for an update on her case.

1            *Count 9*

2            Between April 16, 2008, and August 2014, Defendant took approximately \$5,475 from Ms.  
3 Hilda Albor. Ms. Albor discovered her loss in March of 2015 after viewing a television story on  
4 Defendant's disbarment. Ms. Albor did not discover the fraud sooner because Defendant was able  
5 to string Ms. Albor along with excuses or would completely ignore Ms. Albor. Defendant would  
6 often cancel meetings and fail to return phone calls. Like many of Defendant's clients, Ms. Albor  
7 is not a native English speaker and is unfamiliar with the immigration system. She, like so many  
8 others, simply trusted Defendant, an American attorney, to keep her promises. Ms. Albor's last  
9 payment to Defendant was in August of 2014.

10           *Count 10*

11           Between March 31, 2003 until May of 2007, Defendant took approximately \$8,000 from  
12 Mr. Jose Munoz. Mr. Munoz did not discover his loss until he saw a news story on April 19,  
13 2015. Mr. Munoz did not discover the fraud because, over many years, Defendant ignored Mr.  
14 Munoz and his wife, or gave various excuses as to why nothing was done on his case; she blamed  
15 her health, government shutdowns, and new immigration judges. At one point, she threatened that  
16 if he terminated her services, she would inform immigration she was no longer his attorney, and  
17 then immigration would come get Mr. Muñoz. Ultimately, Mr. Munoz's faith (and fear) in  
18 Defendant kept him from discovering his loss until April 19, 2015.

19           *Count 14*

20           On August 14, 2006, Defendant took \$16,500 from Caesar Silva and Julia Villalobos. The  
21 victims did not discover their loss until they saw a news story in April of 2015. They had not  
22 realized their loss until then because, after getting their work permits, Defendant refused or would  
23 not return phone calls. Defendant filed asylum packages that had no chance of success, and then  
24 filed a second set of applications incorrectly and to the wrong agency, and then abandoned her  
25 clients altogether. The victims maintained faith in Defendant despite these mishaps, often feeling  
26 sorry for Defendant because of her alleged health problems. This changed when the victims got a  
27 new attorney after seeing a news story on Univision in April of 2015, when they first suspected  
28 fraud.

1           **3. Law Enforcement Discovery**

2           Both the Attorney General's Office and the San Joaquin District Attorney's Office first  
3 learned of the complaints of one of the above victims in 2014, well within the statute of  
4 limitations.

5                                       **SECOND SPECIAL ALLEGATION**

6                                       **Denial of Probation (Penal Code section 1203.045)**

7           It is further alleged, that in the commission of the theft alleged in counts 1 through 14,  
8 defendant MARY BROOKS, with the intent to do so, took funds of a value exceeding  
9 \$100,000.00, within the meaning of Penal Code section 1203.045.

10                                       **FIRST ENHANCEMENT**

11                                       **Sentence Enhancement (Penal Code section 12022.6(a)(1))**

12           It is further alleged that in the commission of the offenses alleged in counts 1 through  
13 14, defendant MARY BROOKS, with the intent to do so and pursuant to a common scheme or  
14 plan, took funds and property of a value exceeding sixty-five thousand dollars (\$65,000), within  
15 the meaning of Penal Code section 12022.6(a)(1).

16                                       **SECOND ENHANCEMENT**

17                                       **Sentence Enhancement (Penal Code section 186.11(a)(3))**

18           It is further alleged that in the commission of the offenses alleged in counts 1 through  
19 14, defendant MARY BROOKS, committed two or more related felonies, a material element of  
20 which is fraud and embezzlement, which involve a pattern of related felony conduct, and the  
21 pattern of related felony conduct involves the taking of more than One Hundred Thousand  
22 Dollars (\$100,000), within the meaning of Penal Code section 186.11(a)(3). NOTICE: If found  
23 true, convictions imposed in this matter shall be served in State Prison pursuant to Penal Code  
24 Section 1170(h)(3)(D).

25           All of the foregoing is contrary to the form, force, and effect of the statute in such  
26 cases made and provided, and against the peace and dignity of the People of the State of  
27 California. Attached hereto and incorporated by reference is a declaration in support of arrest  
28

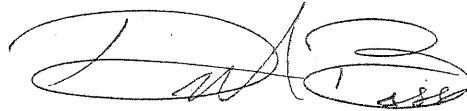
1 warrant and complaint with accompanying official reports, and documents of a law enforcement  
2 agency.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th  
4 day of October 2016, at Sacramento, California.

5 Dated: October 18, 2016

Respectfully Submitted,

6 KAMALA D. HARRIS  
7 Attorney General of California  
8 MAGGY KRELL  
9 Supervising Deputy Attorney General

10 

11 DAVID BASS  
12 Deputy Attorney General  
13 *Attorneys for the People of the State of*  
14 *California*

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CR-2016-14373

FILED  
SUPERIOR COURT-STOCKTON

**DECLARATION IN SUPPORT OF ARREST WARRANT**  
**STATEMENT OF PROBABLE CAUSE**

2016 OCT 26 PM 2:43

**AFFIDAVIT OF REYE EUGENE DIAZ**

ROSA JUNQUEIRO, CLERK

BY KELLY LY  
DEPUTY

**EXPERIENCE AND TRAINING OF AFFIANT**

That your affiant, Reye Diaz, has been employed by the Department of Justice since 1997.

I am currently a Special Agent Supervisor (SAS) and "investigative or law enforcement officer" of the State of California within the meaning of 830.1 of the California Penal Code who is empowered by law to conduct investigations and make arrests for offenses committed within the State of California.

From November 1999 until January of 2003, I was assigned to the California Department of Justice, Bureau of Narcotic Enforcement, San Francisco Regional Office. During this time, my primary assignment was to conduct narcotic investigations which routinely required me to work in an undercover capacity, conduct surveillance on suspects, develop and handle informants, as well as author and serve search warrants. During this time, I also served as case agent on mid level narcotic investigations and assisted with numerous high level narcotic investigations.

From February 2003 until November 2014, I was assigned to the California Department of Justice, Bureau of Gambling Control and Bureau of Investigation. During my time with both the Bureau of Gambling Control and Bureau of Investigation, I served as case agent on numerous investigations pertaining to the following crimes: Pimping, Human Trafficking, prostitution, violent loan sharks/extortion, murder for hire, corruption, embezzlement, grand theft, burglary, illegal lottery, counterfeiting, identity theft, forgery, fraud, embezzlement, and political corruption. I routinely worked with the Federal Bureau of Investigation, the United States Secret Service, the Internal Revenue Service, the Department of Homeland Security, and local law enforcement personnel on numerous major investigations. During these aforementioned investigations, I have conducted numerous hours of surveillance, routinely utilized sophisticated investigative equipment, conducted numerous interviews and interrogations, conducted numerous undercover operations, arrested hundreds of suspects, routinely worked with informants, written numerous search warrants, and have routinely testified in court.

I am cross designated as a task force agent with the United States Homeland Security and FBI, and have received the California Attorney General Peace Officer Award for my work as a criminal investigator. I am currently assigned to the California Attorney General's Financial Fraud Section and Special Crimes Unit where I am tasked by the California Attorney General's Office to combat human trafficking, sex trafficking related crimes, as well as conduct financial fraud investigations.

## CASE SUMMARY

As explained in detail below, this search and arrest warrant pertains to an immigration attorney by the name of Yehlen BROOKS who is suspected of offering and charging for legal services that were never performed.

## **BACKGROUND**

In August of 2015, your affiant was advised by the Office of the California Attorney General's (AG's) Special Crime's Unit, that the AG's Public Right's Unit received a complaint regarding an immigration attorney by the name of Yehlen BROOKS who formally owned and operated Immigration Legal Defense Corporation, located at 1256 W. Lathrop Rd., #303, Manteca, CA. BROOKS allegedly defrauded numerous individuals, most residing in San Joaquin County, out of thousands of dollars for legal work that was never actually conducted on their behalf. Until March of 2015, Yehlen BROOKS maintained a license to practice law in the State of Kansas. As BROOKS was practicing immigration law, she was permitted to represent California clients.

During the subsequent investigation into the matter, your affiant was able to verify that, as a result of BROOKS' fraudulent practices in San Joaquin County, the Supreme Court of the State of Kansas filed an Order of Disbarment against BROOKS on March 2, 2015. BROOKS was found to be in violation of State of Kansas Rules of Professional Conduct regarding competence, diligence, communication, fees, safekeeping property, termination of representation, bar admission and disciplinary matters, and misconduct.

In April of 2016, your affiant travelled to the State of Kansas and met with Stanton HAZLETT, Disciplinary Administrator, with the State of Kansas Office of Disciplinary Administrator. The purpose of this meeting was to go over the various complaints the State of Kansas Office of Disciplinary Administrator received regarding BROOKS. Your affiant subsequently learned that, as of May 2016, the State of Kansas maintained 68 claims against BROOKS that alleged BROOKS stole money from clients in the State of California. The vast majority of the complaints alleged that BROOKS received payment from immigration clients but never did any work on their behalf. Some instances occurred after she was disbarred.

Your affiant reviewed the Kansas files, including documentation reflecting payment to BROOKS from multiple victims. The State of Kansas Office of Disciplinary Administrator, as part of their investigation into the matter, also confirmed with the United States Department of Homeland Security whether any immigration documents were actually filed on behalf of the victims. HAZLETT stated that BROOKS consistently advised clients that she was filing paperwork on their behalf to the United States Department of Homeland Security, but nothing was actually being filed.

After traveling to the State of Kansas and meeting with the State of Kansas Office of Disciplinary Administrator, as well as reviewing all files the State of Kansas deemed appropriate to refund money as a result of BROOKS fraudulent activity, your affiant met with the following nine victims.

## INVESTIGATION

### 1. Marcela LOPEZ:

A review of the State of Kansas file revealed that both Rosario FLORES and Marcela LOPEZ, who are common law husband and wife, met BROOKS in November of 2014 in order to obtain legal status in the United States for FLORES. At the time, they had a young daughter who had cancer, and wanted to bring her to Mexico to meet her grandfather. BROOKS advised the victims in a letter dated, November 9, 2014, that FLORES was eligible to obtain lawful residence through a removal defense and could also possibly get LOPEZ a work permit through a humanitarian application free of charge. BROOKS charged FLORES \$7,000 for her services but would later advise in April of 2015 that there would be an additional charge of \$5,000 for LOPEZ (\$12,000 total). As noted, BROOKS was disbarred in the State of Kansas from practicing law on March 3, 2015 but was still offering legal services. Ultimately, in November of 2015, the victims suspected nothing was being done on their behalf. According to the file, by January of 2016, the victims believed BROOKS was stealing their money and BROOKS was also making unauthorized withdrawals from their account after they had already paid their fees. These unauthorized withdrawals, totaling \$1,750, were returned to the victims by the bank. Ultimately the victims met with another immigration attorney on January 28, 2016 and were advised that BROOKS had been disbarred.

On June 30, 2016, your affiant met with LOPEZ who advised that she paid BROOKS \$12,000 total for services, and confirmed the information from the Kansas file. LOPEZ stated that she and her husband went to BROOKS in November of 2014 so they could both get legal status in the United States. The main purpose for them obtaining legal status was they wanted to be able to take their baby daughter back to Mexico so LOPEZ' father could meet the child.

During the first meeting with BROOKS, FLORES and LOPEZ agreed to pay BROOKS a total of \$7,000 with a \$3,000 down payment. The rest of the money would be paid off in \$500.00 monthly installments. The first \$3,000 payment was given directly to BROOKS in cash soon after their first meeting.

In April of 2015, BROOKS advised LOPEZ that she could obtain a humanitarian visa for LOPEZ. As a result, LOPEZ agreed to pay BROOKS an additional flat fee of \$5,000 with a \$2,000 deposit and \$500 monthly payments. LOPEZ and FLORES gave BROOKS authorization to take \$500 a month out of their bank account. LOPEZ was not aware in April of 2015 that BROOKS was no longer allowed to practice law.

BROOKS led them to believe that she was working with the immigration authorities on their behalf. However, BROOKS kept cancelling their appointments. They would both travel to BROOKS' office only to find out BROOKS couldn't meet with them. LOPEZ told your affiant that BROOKS had given her many excuses as to why the appointments were being cancelled, such as being involved in vehicle accidents and BROOKS' father passing away. During the time they waited for their immigration matter to be resolved, LOPEZ stated that BROOKS also



advised her that she could help LOPEZ's father get some type of temporary visa that would allow LOPEZ's father to meet his granddaughter (LOPEZ' child).

In August of 2015, while they still waited for their immigration paperwork to be processed, and \$500 payments were still being taken out of their account, LOPEZ's baby daughter passed away from brain cancer. BROOKS agreed to meet with them this same month at a coffee shop and they advised her that their daughter died. BROOKS told them both that she was sorry for their loss and was going to come up with another plan that would involve FLORES' employer. As a result, FLORES gave BROOKS the business card of his boss so BROOKS could get in contact with him. After the meeting, FLORES told his employer to be expecting a call from BROOKS, as she was trying to help his family with their immigration issues. However, FLORES' employer never received a call from BROOKS.

FLORES' boss was concerned about FLORES and went out of his way to personally contact BROOKS to see what he could do to help out. The boss was able to get in touch with BROOKS and BROOKS told him that she needed some specific paperwork from him. The boss, in turn, advised BROOKS that this would be no issue but he also wanted to meet with BROOKS, along with his attorney, in person. After this, BROOKS never called the boss back and wouldn't return his multiple calls. Soon after, in approximately November of 2015, they suspected BROOKS was not telling them the truth and had defrauded them. BROOKS even made unauthorized withdrawals from their bank in January of 2016, after she was paid in full. In January of 2016, they met with another attorney, who told them that BROOKS was no longer allowed to practice law.

## **2. Marion Albert MARTINEZ-ARROYO:**

Your affiant reviewed a State of Kansas' claim and investigation file pertaining to Marion Albert MARTINEZ-ARROYO and Jane MARTINEZ. The State of Kansas refunded both victims \$4,170.00 as a result of being defrauded by BROOKS. According to the Kansas Disciplinary Administrator investigation file, BROOKS was hired by Jane MARTINEZ on September 27, 2012 to file an I-601 waiver form for the husband MARTINEZ-ARROYO. This application is filed for the purpose of convincing the government to waive inadmissible alien status due to hardship.

According to the Kansas investigation, BROOKS continually represented to the victims that she filed the I-601 form on their behalf. However, they were advised by the United States Citizen and Immigration Services on January 6, 2015 that this form was never filed. After the victims found out nothing was filed on their behalf, they demanded a refund of \$4,170 and BROOKS agreed to repay them. The Kansas investigation file also contained an email to MARTINEZ, dated January 27, 2015, from a Tyreen PERALTA, who claimed to be BROOKS' sister. In this email, PERALTA advised MARTINEZ that she was replying to BROOKS' clients as BROOKS was transferred to the Intensive Care Unit after an emergency surgery the night before. According to the email from PERALTA, BROOKS would be unable to attend to client requests until later the following week or when she was discharged from the hospital. According to the Kansas investigation file, BROOKS never paid the victims back and they never received

any services from BROOKS. According to the Kansas investigation file, the victims were forced to hire another attorney.

On May 20, 2016, your affiant met with Jane MARTINEZ who advised that she first made contact with BROOKS in September of 2012 for the purpose of hiring her to file an I-601 form for her husband, of Marion Albert MARTINEZ-ARROYO, as her husband was in the United States without legal permission and the I-601 form would help him get permission to remain in the United States without having to leave the country first. MARTINEZ stated that she knew going into the initial meeting with BROOKS that she and her husband wanted to file the I-601 waiver. BROOKS also advised them that her husband could not get deported while he was going through the process. MARTINEZ gave BROOKS \$100 for the initial consultation and made a \$3,500 VISA card payment to BROOKS soon after.

BROOKS advised MARTINEZ that the actual submission of the I-601 waiver shouldn't be done until March of the following year and, in the meantime, MARTINEZ should prepare for the process by writing a letter explaining why her husband should be allowed to stay in the United States so this letter could be submitted along with the I-601 form. BROOKS also instructed MARTINEZ to obtain letters from various references. BROOKS also told MARTINEZ that MARTINEZ would have to take an online psychological test but BROOKS would just take the test for her. MARTINEZ couldn't recall why BROOKS advised them that they needed to wait until March but was led to believe it was "some legal thing".

When March arrived, it was hard for MARTINEZ to get in touch with BROOKS. She either had other appointments or couldn't meet at a certain times. MARTINEZ was ultimately able to meet with BROOKS in April or May (2013) and provided BROOKS with the requested paperwork to submit along with the I-601 waiver form. MARTINEZ stated that she also met with BROOKS in June or July (2013) to provide her more paperwork to submit. According to MARTINEZ, during this meeting, BROOKS told her that she was getting ready to send all the paperwork out to Immigration and then ultimately told MARTINEZ that she sent all the paperwork out via Federal Express.

After some time went by, MARTINEZ placed numerous calls and emails to BROOKS to check on the status, and to also ask BROOKS if she had verified that the I-601 was received by the United States Citizenship and Immigration Services. MARTINEZ stated that she received an email from BROOKS that contained the Federal Express tracking number, showing that the I-601 form was received by the immigration authorities. MARTINEZ stated that after she received this tracking number from BROOKS, she was contacted by a BROOKS' employee who advised her that she needed to deposit another \$670.00 ASAP into an account belonging to BROOKS, as immigration officials were ready to process her husband's paperwork. MARTINEZ and her husband deposited the funds into an account belonging to BROOKS.

MARTINEZ requested that BROOKS provide her a copy of the "I-797" from Immigration, an approval notice that means an application had been accepted and processed. MARTINEZ told your affiant that even when she saw a story on the news that BROOKS was taking money from people without performing services, she still believed in her. Over the two-year process, BROOKS used countless excuses why things were not happening, from blaming it

on immigration authorities, to government shutdowns, to scheduling conflicts, and various medical conditions BROOKS suffered from.

Eventually, in early January of 2015, MARTINEZ and her husband, via the Freedom of Information Act, requested the status of the I-601 directly from Immigration. As a result, MARTINEZ and her husband received a letter from the United States Citizenship and Immigration Services that they maintained no records on Mario Alberto MARTINEZ-ARROYO. MARTINEZ also stated that she was able to determine that the tracking slip that was emailed to her by BROOKS was fraudulent, as she personally ran the tracking number on the Federal Express internet site and was able to determine that the real tracking slip was mailed on a different date and on behalf of a different client by the name of "S Lopez". As a result of all this information, MARTINEZ confronted BROOKS, via a telephone conversation and emails. On January 6, 2015, BROOKS sent an apology letter, blaming a former sub-contractor by the name of Tony CATRAL. MARTINEZ told your affiant that she had never heard of CATRAL and had no idea if this person even existed. All the aforementioned paperwork, including emails of MARTINEZ confronting BROOKS, the Freedom of Information Act request, letter from United States Citizenship and Immigration Services, and BROOKS apology letter, were reviewed by your affiant.

According to MARTINEZ, soon after they found out BROOKS did nothing for them, they demanded their money back and BROOKS agreed to pay them back on multiple occasions, but never did. According to MARTINEZ, she was even emailed one time by a person she never heard of (Tyreen PERALTA), advising that BROOKS was in the Intensive Care Unit. MARTINEZ told your affiant that she emailed BROOKS one time and advised her to bring her husband's file and the money they were owed, and they could both go their separate ways. However, although BROOKS agreed to pay her back, BROOKS would never meet with her.

On May 24, 2016, your affiant interviewed Tyreen PERALTA. As discussed above, MARTINEZ had received an email from an individual claiming to be PERALTA on January 27, 2015. PERALTA told your affiant that BROOKS was her sister. Your affiant showed PERALTA the January 27, 2015 email MARTINEZ allegedly received from PERALTA and asked her if she recalled sending this specific email to a Jane MARTINEZ on behalf of BROOKS. PERALTA told your affiant that she never sent an email to MARTINEZ on behalf of BROOKS and acknowledged this was a lie. It should be noted that PERALTA believed BROOKS was bi-polar, and referenced this as a possible reason BROOKS was not doing the work she was being paid to perform on behalf of her clients.

### **3. Efrén TAVIZON:**

Elizabeth DICKINSON paid BROOKS a total of \$7,500 so her brother, Efrén TAVIZON could obtain residency in the United States. According to the Kansas investigation file, BROOKS never did any work on the TAVIZON file, with the exception of obtaining criminal records.

On May 24, 2016, your affiant met with Elizabeth DICKINSON who told your affiant that she hired BROOKS. According to DICKINSON, she first went to BROOKS' Manteca office with her sister, Maria SHARP, in order to get a green card for their brother Efrén

TAVIZON. According to DICKINSON, she wrote a \$1,500 check to BROOKS the same day of the first visit. TAVIZON had been in the United States since he was eight years old but had never obtained legal status. Before their mother passed away, DICKINSON and her sister, Maria SHARP, promised their mother that they would help her son, TAVIZON, obtain legal status in the United States. DICKINSON told your affiant that this was really important to their mother. According to DICKINSON, because their brother had a criminal history, BROOKS advised them that they first needed to pay her \$1,500 to see what his criminal history looked like. BROOKS advised them both during the first meeting that it could take some time to get the criminal history records. DICKINSON told your affiant that she expressed concern to BROOKS that her brother could be taken out of the country while they were going through the process but BROOKS told them not to worry, as she would try and keep him in the country and could appeal the matter if they didn't win.

After this meeting, they waited over a year and never heard anything from BROOKS or her office. DICKINSON'S sister, Maria SHARP, continually asked DICKINSON what was going on and DICKINSON would just tell her sister that nobody had contacted her yet. As a result, SHARP proceeded to make telephone calls to BROOKS office and would leave multiple messages over several months. Ultimately, they were able to meet with BROOKS who showed them their brother's criminal record. At that time, BROOKS told them both that she could make sure he would get legal status. According to DICKINSON, during this second meeting with BROOKS, her sister, SHARP, expressed concern to BROOKS about hiring her, as it took BROOKS a long time to respond to SHARP's messages that she left with BROOKS. BROOKS told them that she had been very sick and had spent a long time in the hospital. She and SHARP felt this was a good explanation, and decided to move forward. BROOKS told them both during this meeting that she needed a check for \$6,000. DICKINSON then wrote and gave BROOKS the \$6,000 check during this same visit (September 12, 2012). BROOKS told them that she would contact them with things they needed to do. DICKINSON stated that BROOKS acted like it was a sure thing that their brother would get legal status.

According to DICKINSON, they waited another year and BROOKS never called them to give them an update on the case. Once again, Maria SHARP continually tried to get in contact with BROOKS but would get a number of excuses from BROOKS' secretary. Ultimately, the secretary told SHARP that she needed to get a birth certificate and letters from TAVIZON's friends and family. As a result, they worked hard to obtain letters from family and friends and sent them to BROOKS' office. However, as before, they never heard anything from BROOKS' office. According to DICKINSON, they finally got tired of BROOKS' excuses and really started to pressure BROOKS' office staff with telephone calls, as they wanted to meet with BROOKS. BROOKS cancelled three appointments at the last minute, causing DICKINSON to miss work.

Finally, she and SHARP just showed up to BROOKS' office and realized it was no longer open at the same location. According to DICKINSON, SHARP could never get in touch with anyone. SHARP requested their papers back from BROOKS' office but never received anything back. DICKINSON stated that they never talked to BROOKS again, as she just wouldn't answer them and it got to the point that the secretary wouldn't even answer their calls or get back to them anymore. DICKINSON stated that her sister, SHARP, even called BROOKS' office, from another phone, pretending to be a new client. According to

DICKINSON, the secretary was willing to talk to SHARP about the potential new case. However, once SHARP started asking about the TAVIZON case, the secretary hung up on her. According to DICKINSON, she, and her sister, ultimately realized that BROOKS stole their money and never intended to do the work for them.

#### 4. Alvaro JAUREGUI and Sonia RAMIREZ:

Your affiant reviewed an investigation file pertaining to Alvaro JAUREGUI and Sonia RAMIREZ. According to the Kansas file, RAMIREZ retained BROOKS in July of 2012 to defend JAUREGUI from removal proceedings and to establish legal residency. Per the investigation file, at the time RAMIREZ hired BROOKS, the United States Immigration and Custom Enforcement (ICE) were searching for JAUREGUI, as he was in the country illegally. According to the file, RAMIREZ and JAUREGUI provided the State of Kansas proof that they paid BROOKS \$7,600. According to the file, BROOKS told the victims that she spoke to a Chief ICE official who advised that JAUREGUI's removal had been put on the "low priority" list. Nevertheless, JAUREGUI was detained by ICE shortly after they hired BROOKS. According to RAMIREZ, she subsequently spoke with the Chief ICE official (Fresno Region) who advised that ICE never put anyone on a low priority list and that he had never spoken to BROOKS. JAUREGUI was released on his own recognizance and granted a bond and removal hearing that was scheduled for September, 2013. RAMIREZ also claimed that she was told by the ICE official at the time of arrest that he believed BROOKS was giving them false hope and they should go find a legitimate attorney to represent them. When the victims confronted BROOKS with these statements, BROOKS told them that she was a legitimate attorney.

According to the file, between September of 2012 and September of 2013, there was very little contact between BROOKS and the victims. Calls were never returned and BROOKS emailed the victims once, advising that the victims' needed to quit listening to other people and permit her to do her job. According to the file, during the removal hearing for JAUREGUI (September of 2013), BROOKS appeared late, was not familiar with the case, and had done no work for the victims. The Special Master on the matter postponed the removal proceedings, which permitted JAUREGUI to pursue other avenues to stay in the United States. After the hearing, BROOKS ceased all contact with the victims.

On May 27, 2016, your affiant met with both RAMIREZ and JAUREGUI. The information stated by RAMIREZ and JAUREGUI was consistent with what they had described to Kansas authorities.

BROOKS advised them that they had to pay a \$7,500 fee up front and that BROOKS would talk to ICE in Fresno the next day. However, as it was late in the day when they met with BROOKS, and they didn't have the money with them, they had to go to the bank after they met with BROOKS and get a money order for \$7,500. While they were at the bank, BROOKS' office called RAMIREZ multiple times to make sure she was coming back to pay them with the check.

After payment, RAMIREZ waited for two weeks and never heard anything from BROOKS. As a result, they kept calling BROOKS' office to check on the status. Ultimately,

BROOKS told RAMIREZ over the telephone that she talked to ICE and that they put JAUREGUI's file on a low priority list, which would allow BROOKS time to proceed with the process of getting JAUREGUI legal status in the United States. BROOKS told RAMIREZ that she would have to wait for approximately one year until JAUREGUI would have to ultimately deal with charges of being in the country illegally. However, not even three weeks later, JAUREGUI was arrested by ICE in front of his family. ICE authorities also advised RAMIREZ that BROOKS never contacted them regarding JAUREGUI and that JAUREGUI's file was never placed on a low priority list.

According to RAMIREZ, BROOKS never filed any paperwork on their behalf and they were ultimately forced to hire another attorney by the name of Marien SORENSEN in May of 2014. RAMIREZ stated that it took SORENSEN less than a year to do everything and get her husband legal status in the United States. RAMIREZ later wrote BROOKS a letter advising they no longer wanted her representation and wanted a refund. BROOKS never responded.

#### **5. Erica VILLASENOR:**

According to the file, the State of Kansas refunded VILLASENOR \$7,500 as a result of BROOKS' "dishonest conduct". A review of the file, revealed copies of receipts showing proof of payment to BROOKS. According to the file, VILLASENOR retained BROOKS in April of 2012 to assist her with removal proceedings, after VILLASENOR had been detained by immigration officials. According to the file, BROOKS had also promised VILLASENOR residency. Per the investigation file, BROOKS took VILLASENOR's money and then "failed to perform any legal work". Per the investigation file, HAZLETT contacted attorney, Helen ZABEL, who assisted VILLASENOR with her case after BROOKS failed to perform any services. According to ZABEL, there was virtually no chance that VILLASENOR would be granted asylum, which BROOKS told VILLASENOR she could get for her.

On June 7, 2016, your affiant met with VILLASENOR who stated that she first met with BROOKS in April of 2012 at her office in Manteca, CA after she was detained by Immigration and Customs Enforcement (ICE), and released in Stockton, CA. ICE arrested VILLASENOR for being in the country illegally but released her and gave her a court hearing date. After she was released, VILLASENOR went to go see BROOKS approximately four days later. BROOKS told her that she could handle her case, which would be easy, and make court appearances on her behalf. BROOKS told VILLASENOR that the total fee for everything would be \$7,500 and that VILLASENOR would also get her a work permit. VILLASENOR gave BROOKS \$3,750 in cash this same day and setup a payment plan for \$300.00 a month. VILLASENOR stated that she would make these \$300.00 payments, in cash, to BROOKS' office or would deposit the money into BROOKS' Chase Bank account. Your affiant asked VILLASENOR, what exactly BROOKS told her that she could do for her and VILLASENOR stated that BROOKS advised her that her case would be simple because they could use a type of asylum that was based on a domestic violence clause. BROOKS told her that it would take approximately three months for her to get a work permit and that VILLASENOR would not get deported.

During the following year, after she hired BROOKS, BROOKS went to approximately four immigration hearings with VILLASENOR in Stockton, CA. According to VILLASENOR, BROOKS never did anything and, in hindsight, actually hurt her, as BROOKS cancelled one hearing, telling VILLASENOR that the judge was not available. VILLASENOR told your affiant that she subsequently went to another hearing with BROOKS and the judge asked BROOKS why she was cancelling her clients appointments and also told BROOKS if she was sick, her client should have someone else to make the court appearances. According to VILLASENOR, BROOKS didn't realize VILLASENOR understood what the judge was telling BROOKS, as VILLASENOR does speak some English. VILLASENOR told your affiant this is when she realized BROOKS was lying to her about the judge not being available for hearings. VILLASENOR stated that she wasn't really sure what BROOKS was doing for her and BROOKS would basically disappear after each court hearing, and VILLASENOR could never get in touch with her. VILLASENOR stated that she would leave messages for BROOKS but just got a lot of excuses, which included, BROOKS having medical issues with her hands. VILLASENOR believed that the only reason BROOKS was showing up to the court hearings was because VILLASENOR was still making her \$300 monthly payments to BROOKS. VILLASENOR stated that BROOKS' office was always willing to talk to her when she was making a payment but never when it was regarding the case.

VILLASENOR stated that BROOKS did show up for a hearing after she was paid the whole \$7,500 but still asked for more money. VILLASENOR told your affiant that four days after the last hearing on January 27, 2014, BROOKS had VILLASENOR fill out an application for a work permit and promised her that she would be able to get VILLASENOR the work permit within 30 days. BROOKS told her that she needed another \$380 to process the paperwork, so VILLASENOR went and got a money order for BROOKS. VILLASENOR didn't quite understand why it took close to two years for BROOKS to eventually get her to fill out this paperwork for the work permit. After VILLASENOR filled out the paperwork and paid BROOKS the \$380, she never heard from BROOKS. She continually called BROOKS' office and would show up to see what was going on with the work permit but was just told to wait.

VILLASENOR eventually took BROOKS to small claims court for the money BROOKS took from her and they ruled in VILLASENOR's favor. According to VILLASENOR, BROOKS never even showed up to court. VILLASENOR told your affiant that the whole ordeal was stressful, as BROOKS not only stole her money, but also wasted her time and gave her false hope.

#### **6. Maribel CORNEJO:**

According to the State of Kansas file, CORNEJO hired BROOKS on October 27, 2012 for \$7,500. BROOKS agreed to represent CORNEJO with "removal defense-asylum". CORNEJO paid BROOKS \$3,000 on October 28, 2012, and agreed to pay the rest of the fee in installments. After CORNEJO paid BROOKS the \$3,000, BROOKS avoided contact with her. As a result, CORNEJO ultimately asked for a refund but never received one. The file revealed a contract that stated BROOKS would not start representing CORNEJO until she received full payment. However, after paying the \$3,000 and asking for guidance, as well as attempting to bring the documents BROOKS requested, BROOKS would not call CORNEJO back.

On June 7, 2016, your affiant met with CORNEJO who stated she hired BROOKS in late October of 2012 for \$7,500 and paid her \$3,000 in cash so she could stay in the United States legally. According to CORNEJO, this first meeting took place at BROOKS' office in Manteca, CA. CORNEJO agreed to pay BROOKS \$500.00 a month starting in January (2013) until the \$7,500 was paid off. CORNEJO deposited the \$3,000 cash into BROOKS Chase bank account and showed your affiant the receipt for this. CORNEJO told your affiant that she was referred to BROOKS by friends who had used BROOKS approximately four years prior. According to CORNEJO, these friends advised her that BROOKS had helped them get permanent residency in the past.

CORNEJO told BROOKS that she needed asylum, as she was kidnapped in Mexico a month prior and ultimately released. According to CORNEJO, she maintained family members in Mexico that were kidnapped and were still being held. CORNEJO stated that BROOKS advised her that Mexico did not qualify for political asylum but BROOKS knew of another type of asylum. CORNEJO wasn't sure what type of asylum BROOKS was referring to but believed BROOKS.

As the contract contained in the Kansas file stated that BROOKS had no obligation to commence legal services until the whole \$7,500 was paid, your affiant asked CORNEJO if BROOKS agreed to do any work after she was paid the \$3,000. CORNEJO stated that BROOKS told her that she would start working on the case immediately and gave CORNEJO an appointment at the end of November (2012), so she could bring BROOKS a number of documents that BROOKS requested from her during their first meeting. However, after she paid BROOKS the \$3,000, BROOKS wouldn't return her phone calls and just avoided CORNEJO. CORNEJO left many messages for BROOKS and with BROOKS' office staff. CORNEJO spent a whole year trying to track BROOKS down and advised that BROOKS even switched offices during this time. CORNEJO ended up calling BROOKS' office in late 2013, acting like she was a new client that was interested in hiring BROOKS. CORNEJO was subsequently able to get an appointment with BROOKS. CORNEJO showed up with a friend and confronted BROOKS over the fact that she paid her \$3,000 and that BROOKS wouldn't call her back. BROOKS blamed the whole matter on her secretary, stating she never got the messages. BROOKS even told CORNEJO that if she started making payments to her again, she would keep working on the case.

CORNEJO wouldn't give BROOKS any more money, as she didn't think she could trust her anymore. In fact, CORNEJO stated that she asked BROOKS for the \$3,000 back and BROOKS advised her that CORNEJO probably owed BROOKS' money, as BROOKS worked on CORNEJO's file, further explaining to CORNEJO that she (BROOKS) charged by the hour. BROOKS further told her that she would look at the work she put into CORNEJO's file, and would refund CORNEJO back any money she might owe CORNEJO within 30 to 45 days. However, BROOKS further advised if she (BROOKS) was owed any money, she would send CORNEJO a bill. CORNEJO never received a refund from BROOKS.

CORNEJO told your affiant that BROOKS couldn't have done anything for her, as after she paid BROOKS the \$3,000, BROOKS wouldn't even meet with her to receive the documents



she was supposed to provide BROOKS. These documents included information BROOKS would have needed in order to file anything on her behalf.

### 7. Citalli PADILLA:

A review of the State of Kansas PADILLA file revealed that PADILLA and her husband, Emmanuel LOPEZ, retained BROOKS in July of 2010 so LOPEZ could file an I-130 for his wife PADILLA. An I-130 form is an application for a United States resident to sponsor another person for a green card. After the I-30 "relief" was obtained, BROOKS was supposed to file an I-601 form on behalf of PADILLA. This application is filed for the purpose of convincing the government to waive PADILLA's inadmissible alien status due to hardship.

On June 16, 2016, I interviewed Citalli PADILLA and Emanuel LOPEZ who told your affiant that they first went to BROOKS in 2009, at her downtown office in Stockton, CA. The purpose was for PADILLA's husband to petition for her to get a green card. During their first meeting, they gave BROOKS \$1,000 in cash and were given a receipt. They had both agreed to pay BROOKS a total of \$3,500 for her services but were also expected to pay for application and other fees to the immigration authorities. Everything appeared to be running smoothly at first, as BROOKS did in fact file an "I-130" for PADILLA in 2010, and, it was approved. According to PADILLA, after the I-130 was submitted on their behalf, BROOKS gave them a list of things they needed to do for an "I 601a waiver". However, BROOKS told them that it would be to PADILLA's benefit to wait until a new law took effect before submitting this waiver. LOPEZ told your affiant that it made sense, as they also needed to finish paying BROOKS off before BROOKS would submit the waiver on their behalf anyways. PADILLA stated that they didn't have all the money to pay her right away so BROOKS kept their application active until they were able to obtain more money. Both were also willing to wait a long time before submitting the "I 601a waiver" because BROOKS told them that that upcoming new law wouldn't require PADILLA to go to Mexico to submit the paperwork. Ultimately, they paid BROOKS off the total amount of \$3,500 in 2012 and BROOKS still needed to file the "I-601a waiver" on PADILLA's behalf.

According to PADILLA, while still going through the process, PADILLA had a physical altercation with a family member and an arrest warrant was subsequently issued for her arrest in Kern County (California). As a result, PADILLA became very concerned, as she was still in the country illegally. PADILLA immediately contacted BROOKS and met with her in person. BROOKS told her that she could help her out with the situation. However, BROOKS advised that she could no longer take payments and needed another \$8,500 paid upfront in order to help PADILLA with the criminal matter. BROOKS told PADILLA that out of the \$8,500, BROOKS would pay a criminal attorney by the name of Heath WELDING and also use some of the money to further represent PADILLA with her immigration matter, as there was a chance BROOKS would have to go to Mexico on PADILLA's behalf and would also have to file a "criminal exception" with the I 601a form.

PADILLA was able to come up with the money by borrowing from friends. She deposited the money into BROOKS' Chase Bank account. PADILLA also advised your affiant that WELDING was able to help her with her criminal case by getting her charges reduced to a

misdemeanor. However, PADILLA learned from WELDING that BROOKS only paid him \$750.00 to represent PADILLA with the criminal case. Your affiant confirmed this fact by reviewing a letter written by WELDING. PADILLA acknowledged that BROOKS never told her exactly how much money was going to WELDING, further telling me that they just trusted her and thought it would also go towards helping PADILLA get her green card. Your affiant asked PADILLA and LOPEZ if BROOKS ever did any other services for them with the extra \$7,750 BROOKS kept. PADILLA and LOPEZ both told your affiant that BROOKS never performed any other services for them.

In approximately November of 2014, they paid BROOKS with two money orders, totaling more than \$700.00, as BROOKS told them that they had to pay additional application fees required to pay for the I-601a. They went to BROOKS' office and gave her the required paperwork and money orders. According to PADILLA, BROOKS told them that they would be celebrating by next Thanksgiving (2015). The money orders they gave BROOKS were cashed within a couple of days. Afterwards, PADILLA continuously checked on the status of the paperwork but would never get a response from BROOKS. Ultimately, PADILLA received an email, dated February 24, 2015, from BROOKS stating that the I-601a paperwork was submitted. BROOKS also providing a certified mail receipt showing the documents were sent off on February 7, 2015. PADILLA subsequently went to the post office and showed them the tracking receipt she received from BROOKS in the email. The post office advised PADILLA that the tracking receipt was not valid. PADILLA also told your affiant that BROOKS later emailed her a copy of a \$670.00 cashier's check she claimed she sent to the Department of Homeland Security for the I-601a filing fee. LOPEZ showed your affiant copies of these documents and it is quite apparent to your affiant that these documents were manipulated.

PADILLA told your affiant, based on news stories she saw, she learned BROOKS was disbarred in March of 2015. Nevertheless, BROOKS told her that she was still going to complete the application even after she was disbarred. PADILLA told your affiant that she personally checked with the United States Customs and Immigration Services in May of 2015, and they advised her that BROOKS never sent them anything pertaining to the I 601a.

#### **8. Hilda Albor:**

During this investigation, your affiant reviewed the State of Kansas File on Hilda ALBOR, and also interviewed her in September of 2016. Your affiant was able to determine based on my review of documents and my interview, that Hilda ALBOR went to BROOKS to get legal status for herself and her son, Jose Carlos ALBOR. Hilda ALBOR's husband is currently a legal resident in the United States. Hilda paid BROOKS \$5,000 and services were performed for her son, but nothing was ever done for Hilda ALBOR. It was not until March of 2015, that Hilda ALBOR realized BROOKS never submitted anything to immigration authorities and no work was done on her behalf. Hilda ALBOR also advised that BROOKS took all her original paperwork and never gave it back.

#### **9. Anabelly SHEEL & Raul SHEEL:**

During this investigation, your affiant reviewed the State of Kansas File on Anabelly SHEEL, and also interviewed her and her husband, Raul SHEEL, in September of 2016. Raul and Anabelly SHEEL both went to BROOKS in February 2012 so Raul SHEEL could sponsor his wife Anabelly SHEEL. BROOKS initially submitted a petition on behalf of Anabelly SHEEL but never performed any other services, lying to them that she was working on the file. After full payment, it became very hard to get in contact with BROOKS.

Initially, the SHEEL's paid \$2,500 down with a cashier's check, kept a receipt, and agreed to pay \$150.00 a month until the total of \$5,000 was paid. Raul SHEEL told your affiant that they ended up paying BROOKS around \$5,800, as there were other fees they were required to pay in order to process their paperwork with Homeland Security, which included a psychological evaluation BROOKS told Anabelly SHEEL she had to do. However, Raul SHEEL told your affiant that BROOKS told them that she would just take the test for them. Anabelly stated that they ended up paying BROOKS off approximately one year after they hired her in 2013.

Anabelly SHEEL advised that BROOKS said that there would be no issue in getting the "I 601 a" on her behalf, and that when Anabelly SHEEL went to Guatemala, her country of origin, BROOKS would be able to get her a green card when Anabelly SHEEL got back to the United States. Anabelly SHEEL told your affiant that BROOKS told her that her case was easy and would only take approximately one year to complete. Raul SHEEL told your affiant that they even asked her what would they do if his wife was denied and she told them not to worry that she had never lost a case before. Anabelly SHEEL told your affiant that after BROOKS filed the first petition on their behalf, and they received the information back a couple of months later. BROOKS then told them that they now needed to start on the 601 waiver and instructed Anabelly SHEEL to get 13 letters written from people on her behalf, among other required documents. Anabelly SHEEL advised that she was able to gather the documents up for BROOKS in a rapid fashion and turned them over to her. After they turned this paperwork over to BROOKS in April of 2013, they waited months to hear back from BROOKS, further stating that the only time BROOKS office would call them, was to make sure the monthly payment would be on time that month. Anabelly SHEEL told your affiant that she would call to get status updates but BROOKS was never available and, the office staff never had any information, or updates, for her. Anabelly SHEEL stated that she was consistently told by the office that BROOKS was sick or in the hospital. After they finished with their payments a year later, they were still not getting any responses from BROOKS office in 2014. As a result, Anabelly SHEEL started to suspect something was wrong but her husband, Raul SHEEL, told her not to worry, as BROOKS told them it would take about a year and he still had confidence and trust in BROOKS.

Eventually, the SHEEL'S were able to get an appointment with BROOKS on May 5, 2014, at BROOKS' Manteca office. Anabelly SHEEL questioned BROOKS on the 601 waiver paperwork and BROOKS told them that she had sent it in already. Anabelly SHEEL asked BROOKS why she never received any copies of what was sent in and BROOKS told her that she could give them copies next week. Raul SHEEL questioned BROOKS as to why the paperwork wasn't in the office and BROOKS told him the paperwork was at her home. Raul SHEEL told your affiant that they ended up believing BROOKS but, just to be safe, went ahead and checked with United States Citizen and Immigration Services to verify receipt of the paperwork from BROOKS. They were subsequently advised by an "Immigration officer" that there was no file on Anabelly SHEEL and nothing had been filed on her behalf by BROOKS. Raul SHEEL told

me that he still wanted to trust BROOKS, so he went ahead and waited another week just in case the immigration authorities hadn't gotten the forms yet. After waiting, they were advised of the same thing, nothing had ever been received.

Raul SHEEL advised your affiant that he proceeded to call BROOKS' office to get the copies he was promised but nobody would help him. Anabelly SHEEL told me that one of the secretaries even hung up on her when she called wanting her papers back.

**OTHER VICTIMS:**

During the investigation into BROOKS, your affiant reviewed other investigation files in the State of Kansas pertaining to other victims your affiant has not yet interviewed. These files revealed the following:

**1. Jesus & Griselda ESTRADA:**

A review of this investigation file revealed that the victims signed contract a on May 6, 2013 to obtain residency for Griselda Estrada and paid BROOKS \$7,400. According to victims, they had trouble communicating with BROOKS who was too ill to go to court. As a result, the victims sent a letter to BROOKS on December 23, 2014 requesting their file back. The victims later learned on television that BROOKS had been disbarred. The State of Kansas was able to confirm with immigration authorities that BROOKS never sought any relief on behalf of Griselda ESTRADA.

**2. Jorge FLORES-CUEVAS & Ana MERCADO:**

According to the State of Kansas investigation, BROOKS was hired on August 13, 2013 to obtain work permits for both victims and signed a retainer for \$12,000. There is a question of BROOKS' preparation for asylum petitions for both claimants, as the victims were not subject to removal proceedings. However, immigration services verified even these asylum petitions were never filed on behalf of the clients.

**3. Jose MUNOZ:**

According to the State of Kansas investigation, MUNOZ retained BROOKS in 2003 to represent him due to the fact that he was deported in 1991. A review of the contract revealed that BROOKS would apply for asylum on behalf of the victim. The victim was able to show the State of Kansas that he paid BROOKS \$6,950.00 for her services. On April 28, 2015 MUNOZ filed a claim with the State of Kansas. The victim was able to provide an abundance of documentation showing a "pattern of Ms. BROOKS telling the claimant that various delays which had occurred were due to her medical conditions and the difficulty of the claimant's case." Correspondence provided to the State of Kansas showed that BROOKS assured MUNOZ that the proper documentation had been filed with immigration authorities on his behalf. The State of Kansas was able to determine in their investigation that BROOKS never filed anything on behalf

of MUNOZ and also appears to have provided the victim a doctored document to make it appear she did indeed file paperwork on behalf of MUNOZ. MUNOZ did not realize BROOKS did nothing on his behalf until he found out she was disbarred in 2015.

#### **4. Cesar SILVA and Julia VILLALOBOS:**

A review of the investigation file revealed that SILVA and VILLALOBOS are husband and wife. Both retained BROOKS in 2006 in order to obtain visas. Both were able to provide proof of payment in the amount of \$11,500. The investigation revealed that although BROOKS was hired in 2006 she didn't provide any action on their behalf until 2011 when she filed a request for amnesty for both of them. In confirming with the victims current attorney, filings for amnesty on behalf of the victims had no chance of success. In fact, the filing alerted the immigration authorities that both were in the country illegally and SILVA ended up getting arrested. BROOKS did help get SILVA out of detention and also filed applications for removal on behalf of both victims in 2012. However, she then abandoned the victims, as they could no longer get in touch with her. Both victims learned in 2015 that BROOKS was disbarred and hired another attorney.

#### **5. Stephany and Gabriel LOPEZ:**

This file revealed that both Stephany and Gabriel LOPEZ are husband and wife. They retained BROOKS on March 25, 2013 for the purpose of helping Stephany LOPEZ immigrate to the United States. Gabriel LOPEZ was already legally in the country. BROOKS was required to file two forms on behalf of the victim, an I-130 and an I-601 form. BROOKS only filed the I-130 form. According to the investigation, the claim is well documented. As in many of the other claims, BROOKS gave the victims a number of excuses as to why it was taking so long. In January of 2015 the victims requested that BROOKS finish their file and also requested proof. After this request, BROOKS declined to represent the victims any longer, stating that she was upset they no longer trusted her. BROOKS sent the victims a partially filled out I-601 and told them to finish things themselves. A review of this file revealed that the victim also received an email from a Tyreen PERALTA, indicating that BROOKS was in the hospital and PERALTA was assisting with her file. As referenced in your affiant's interview with PERALTA on May 24, 2016, regarding another BROOKS's victim by the name of Jane MARTINEZ, PERALTA acknowledged to me that she did not write an email on behalf of BROOKS. Thus, there is probable cause to believe that BROOKS once again posed as PERALTA in order to avoid Stephany LOPEZ.

#### **INTERVIEW WITH FORMER EMPLOYEE:**

During your affiant's investigation into the matter, I was able to talk to a former BROOKS employee who worked for BROOKS from 2005-2010 and managed many of the immigration files. According to this employee, BROOKS would come into the office to pick up client files that the employee prepared for her. BROOKS would take them home and, many times, no work was being done on the files. The employee told your affiant that BROOKS had a lot of clients and, as the files continually backed up, clients became irate. BROOKS would have her secretaries lie to the clients, by advising the clients that the files were being worked on and

paperwork was being filed on their behalf, According to the employee, BROOKS was even bringing phony post office tracking numbers from home and having her secretaries give them to the clients as proof their paperwork had been mailed out. The employee remembered approximately 20 instances of the phony tracking numbers. The employee told your affiant that even though files were not being worked on, BROOKS continually brought in new clients. The employee told your affiant that he/she quit in 2010, as he/she just couldn't take the constant lying anymore.

### CONCLUSION

There appears to be a consistent pattern of BROOKS taking payments from a victims, and doing very little or no work on behalf of the victim. Victims then have a hard time getting in touch with BROOKS, and BROOKS advises victims that she has filed paperwork on their behalf when she has not done so. This constitutes probable cause to believe that Brooks is engaging in grand theft in violation of Penal Code 487(a). During the investigation into BROOKS, your affiant also reviewed copies of two forged documents, in violation of California Penal Code 470, that were given to victims (clients) as a way to support her claim that documents were filed on their behalf with immigration authorities.

Based on the victims interviews, former employee interview, and disbarment files, BROOKS was taking money from the victims without performing services she was paid for. BROOKS' criminal intent is further evidenced by phony emails, doctored documents, and fake postal tracking numbers. There is an abundance of probable cause that BROOKS purposely took money from, at least, 14 cited clients in violation of California Penal Code 487(a) (Grand Theft). This investigation has revealed numerous other potential victims that have not been cited in this affidavit. There is probable cause to believe, besides the additional victims paid by the State of Kansas for being defrauded by BROOKS that are not cited in this affidavit, there are additional victims of BROOKS' that never submitted claims to the State of Kansas. In fact, during you affiant's investigation into this matter, I was advised on multiple occasions by victims I interviewed that there were other victims they were aware of that did not submit claims to the State of Kansas.

Based on my training and experience, I know that suspects, fraudsters, and con artists who fraudulently obtain money will often conduct additional fraudulent transactions that have not been uncovered. Based on my training and experience, I know that it is common for suspects and con artists who attempt to defraud others will have successfully defrauded others out of money in the past, and will often be engaged in separate fraud schemes at the same time. Based on my training and experience, your affiant also knows that con artists and thieves who steal large sums of money from their victims will most often not pay taxes on the money they have stolen, a felony in the State of California.

As cited in this affidavit, BROOKS on multiple occasions, would not give her victims their files back. Based on my training and experience, your affiant knows that suspects engaged in defrauding others out of money will often maintain records at their residence, such as address books containing the identities and contact information of other victims, client lists, as well as witnesses to the crime. This experience combined with the fact that BROOKS consistently maintained client files and no longer practices law, there is probable cause to believe BROOKS

would maintain additional victim files, information, at her place of residence that would provide additional evidence of Grand Theft. In fact, the former employee cited in this affidavit advised your affiant that BROOKS routinely took client files home with her.

There is also probable cause to believe that evidence supporting Grand Theft will be found in bank records belonging to Yehlen BROOKS, as a number of the victims cited were instructed to deposit payments into bank accounts belonging to BROOKS. Also, based on your affiant's training and experience, your affiant knows that fraudsters and con artists who utilize bank accounts often utilize them to maintain funds they obtained by their criminal actions.

Based on my training and experience, I know that suspects and con artists who are engaged in defrauding others out of money will often keep correspondence with their victims and co-conspirators in the form of text messages, e-mails, and letters at their place of residence on cellular phones, computers, laptops, external storage drives, and hard copies. Your affiant is also aware that individuals often maintain their computers, cellular phones, and digital storing devices for years. Your affiant is also aware that deleted files on computers can be recovered by computer forensic experts. Your affiant is aware that digital files or remnants of such files can be recovered months or even years after they have been downloaded onto a hard drive or other storage device, deleted or viewed via the Internet. Digital files downloaded to a storage device can be stored for years and remain on the storage device until it is overwritten by new data.

Your affiant has also been advised by computer forensic experts that deleted files, may reside in free space or slack space—that is, in space on the storage device that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a device's operating system may also keep a record of deleted data in a "swap" file and that files that have been viewed via the Internet are typically automatically downloaded into a temporary Internet directory or "cache." The browser often maintains a fixed amount of space devoted to these files, and the files are only overwritten as they are replaced with more recently viewed Internet pages or if a user takes steps to delete them.

Your affiant is also aware that searching for information stored in digital devices often requires that the device be accessed and searched using specialized programs or tools by a qualified expert in a controlled environment. This is often necessary to ensure the accuracy and completeness of such data, and to prevent the loss of the data either from accidental or intentional destruction. Data search processes are designed to recover even "hidden," erased, compressed, password protected, or encrypted files. Because digital evidence is vulnerable to inadvertent or intentional modification or destruction (both from external sources or from destructive code imbedded in the system as a "booby trap"), a controlled environment may be necessary to complete an accurate analysis.

As outlined in this affidavit and shown in Attachment #1, BROOKS doctored documents in order to make it appear she was submitting paperwork on behalf of her clients to the Department of Homeland Security.

Based on my training and experience, I know that individuals who are involved in doctoring and forging documents in furtherance of their crime, will keep evidence of their crimes

in their residence, commonly use cellular telephones, computers, laptop computers, flash drives, scanners, printers, digital cameras and graphic design software, image editing software programs, to help facilitate the scheme. These items are used to send images, store, scan, create, alter, modify, adjust and falsify documents, both original and counterfeit, to the needs of the individual and the accomplices.

During this investigation, your affiant has determined that BROOKS currently resides at the address in Attachment #A, Manteca, CA (San Joaquin County). Your affiant was able to determine this fact through public records (Grant BROOKS currently owns this home), as well as, surveillance conducted on September 21, 2016, and October 18, 2016, by your affiant and other DOJ agents. During this surveillance on September 21, 2016, BROOKS was observed to be living at this residence and also in control of the residence. During the surveillance on October 18, 2016, the same vehicles associated to the residence were observed at the residence.



## SUMMARY OF LAW

### Penal Code § 487 – Grand Theft

A person has committed grand theft when she takes the money and personal property of a another, and the value exceeds \$950.

### Penal Code § 470 - Forgery

A person has committed forgery by either in false making or alteration of document without authority or uttering of such document with intent to defraud.

### Penal Code § 528.5(a) – Electronic Impersonation

A person has committed electronic impersonation when she knowingly and without consent credibly impersonates another actual person by electronic means for purposes of defrauding another person.

### Business and Professions Code § 6126(a) – Unlicensed Practice of Law

A person has committed the unlicensed practice of law when she is not an active member of the bar and not otherwise authorized to practice law and who does unlawfully hold herself out as practicing and entitled to practice law.

## SPECIAL MASTER PROVISION

The investigation has revealed that Mary Yehlen Brooks was a licensed Kansas State attorney practicing immigration law in California between 2000 until 2015. At least as far back as 2008, clients have complained or been caught in BROOKS unlawful and fraudulent scheme. She has retained an attorney and Grant Brooks, who she resides with, is also an attorney. I recognize that the requested property (records) at the locations listed to be searched could be commingled with material to which they or a third party may raise a claim of privilege. Should such claim arise, pursuant to Penal Code section 1524(d) through (f), I will seek further permission from the Court to appoint a special master or review claimed privileged documents in camera.

At the time of seizure, only those files that are listed in this warrant will be seized. This list of clients was composed by researching those clients that made some type of fraud claim against BROOKS in small claims court in San Joaquin county or with the State of Kansas Office of Disciplinary Administrator. It is anticipated that this list represents files not subject to privilege as they fall under the definition of Penal Code section 1524(c), stating that a warrant shall not be issued for attorneys client records *unless* the attorney is “reasonably suspected of engaging or having engaged in criminal activity related to the documentary evidence for which a warrant is requested.”

**SEALING ORDER:**

Due to the high exposure of this investigation, your affiant believes it is justified to seal portions of the affidavit and search warrant that list Brooks' residential address and personal identifiers.

Your affiant believes there is sufficient probable cause that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524.

**FOR THE FOLLOWING LOCATIONS:**

**SEE ATTACHMENT "A"**

**THE FOLLOWING PERSON:**



1. Yehlen BROOKS  
Further Described in Attachment "A"

**THE FOLLOWING VEHICLES:**

Any and all vehicles under the control of Yehlen BROOKS at the time of the search warrant is served, as evidenced by DMV registration information, possession of keys to the vehicle, actual use of the vehicle, witness statements or admissions.

**FOR THE FOLLOWING PROPERTY:**

1. **Known Clients Files pertaining to Yehlen BROOKS and/or immigration companies, businesses previously OR currently operated by Yehlen BROOKS, listed below (clients that have filed fraud claims with the State Bar of Kansas or the San Joaquin Small Claims Court- Bolded Names are victims in the criminal complaint to be filed on 10/27/2016) and related information, to include correspondence (to include emails & text messages), contracts, and any other business related activity pertaining to immigration services performed by Yehlen BROOKS:**

1. **Hilda Albor**
2. Oscar Ivan Ayala
3. Nancy Bellina
4. Juan Briseno-Ochoa
5. Gabriela Calderon
6. Martin Canada
7. Isidaro Castillo
8. Clarisa Concepcion
9. **Maribel Cornejo**
10. Rafael Corona
11. Graciella Cortes
12. Ricardo Cuevas
13. **Jesus/Griselda Estrada**
14. **Jorge Flores**
15. **Marcela Flores**
16. Juan Garcia-Ramirez
17. Miguel Hernandez-Islas
18. Sixta Hernandez-Ramos
19. **Alvaro Jauregui**
20. Oscar Roque Ladrillo
21. Salma Lal
22. **Felipe Lopez**
23. Gabriel Omar Lopez
24. **Rosario Lopez**
25. **Mario Martinez**
26. Juan Carlos Crus Mendoza
27. Martha L Montes
28. **Jose Munoz**
29. Ma Guadalupe Placenia
30. **Citlalli Padilla**
31. Jose Regaldo
32. Francisco Romo
33. Zaira Virdiana Razo
34. Guadalupe Rodriguez-Osario
35. Obed Osario Sanchez
36. **Raul/Anabelly Sheel**
37. **Efron Tavazon**
38. Lorenzo Torres-Herrera
39. Andrea Valencia
40. Francisco Daniel Villalobos Venegas
41. **Julia Villalobos**
42. **Erica Villasenor**

2. **Business and Financial Records**

All business and financial records relating to Immigration Legal Defense Corporation and/or any other immigration service entities owned, or operated, by Yehlen BROOKS.

Office operating manuals, manuals including descriptions of sales, intake manuals including methods and procedures for signing up new clients; sales scripts, directions and instructions on how to interact with clients, prospective clients, current clients including upset or irate clients, promotions manuals, flyers, mailers, radio and television media, notes documents and information supporting promotional claims of past success stories.

**3. Indicia of Forgery**

Any items commonly used to manufacture, alter, counterfeit, prepare and/or foster the forging/doctoring of documents related to immigration matters, to include pencils, pens, graphic design software, image editing software, stamps, stamping equipment, cutting devices, typewriters, computer systems, photographic and printing equipment, enlargers and reducers, film, cameras, digital image cameras, computer scanners, photocopy machines, laminators, specialized paper, processing computer software programs.

**4. Computer Equipment and other Electronic Devices**

Any Computer(s), Computer System(s) and all Electronic Data Storage Devices, which may contain the property to be seized pursuant to this warrant (items detailed in paragraphs 1 and 2 immediately above). Computer(s), Computer System(s) or Electronic Data Storage Devices include, but are not limited to: Computers, computer hard drives, external memory drives, portable USB memory devices (commonly referred to as thumb drives), palm pilots, electronic organizers, personal data assistants (PDA's), floppy disks, media cards, cellular telephones belonging to BROOKS, CD-ROM, whether found together or separately from one another, or as part of a computer network; and all hardware and equipment necessary to retrieve such data, whether found together or separately from one another, or as part of a computer network, including but not limited to: computer systems; computer hardware; including peripherals and cables; central processing units (CPUs); hard disk drives; floppy disk drives; tape drives; optical/CO-ROM drives; display screens; input device; printers; peripherals; floppy disks; magnetic tapes; removable storage media; optical/CO-ROM disks or cartridges; and all software necessary to retrieve such electronic data including but not limited to: operating systems, data bases, spreadsheets, word processing, graphics, accounting, communications programs; and all documentation or other material, whether printed or handwritten, describing the operation of any computer systems, computer hardware, software, or computer peripherals found at the premises, including instructions on how to access disks, files, or other material stored within same; including but not limited to computer manuals, printouts, passwords, file names lists, "read me" and "help" files.

**5. Communications Content**

Communications content, including email, subscriber information, text (SMS/MMS or app chats), notes, source and destination addresses, and time and date information, and connection logs, images and any other records pertaining to immigration files, financial records, that constitute evidence and instrumentalities of: (1) Use of false government identification, (2) Eavesdropping, or (3) Filing false documents with a government entity, including communications referring or relating to this investigation.

6. **Federal and State income tax returns**  
Federal and State income tax returns (2009-2015) pertaining to Yehlen BROOKS, including any supporting schedules, attachments, or work papers, such as 1099 Forms or W-2 forms.
7. **Calendars for years 2003-2016.**
8. **Savings account records including passbooks and bank statements.**
9. **Checking account records including bank statements, check register tapes, deposit slips, canceled checks, check stubs, and wire transfer documentation.**
10. **Employee Information**  
Lists of current and former employees of BROOKS to include lists, rosters, personnel files, job applications and resumes, and all identifying and contact information. Employee job descriptions and qualifications, hiring processes and practices, training documents, files, manuals including operations manuals, training manuals and documents such as for conducting client intake, documents dictating standard operating procedures for Immigration Defense Services or any other name by which BROOKS may have done business as an immigration attorney, hiring records including advertisement, requirements, testing/examinations, interview notes.
11. **Advertising Records, Documents, Recordings, Video, etc.**  
Documents, audio and video recordings, photographs, scripts, background and supporting documentation for advertising campaigns such as radio broadcasts, television "interview" style infomercials, print and internet based promotional events and activities used by BROOKS to promote her immigration law practice.

The above described property includes all of the items of evidence in whatever form and by whatever means that may have been created or stored, including records, whether stored on paper, on magnetic or digital media, or any other storage media, or any other form of "writing" as defined by Evidence Code section 250, together with indicia of use, ownership, possession, or control of such property.

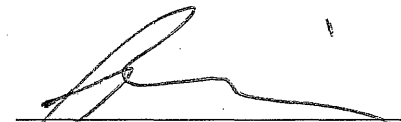
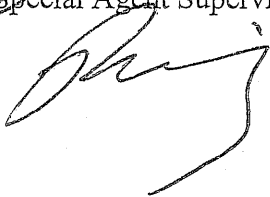

Investigating officers are authorized, at their discretion, to conduct an offsite search of the seized items for the property described. Investigating officers and those agents acting under the direction of the investigating officers are authorized to access all data on the cellular/computer/digital devices device to determine if the data contains the items as described above. If necessary, investigating officers are authorized to employ the use of outside experts, acting under the direction of the investigating officers, to access and preserve data on the cellular/computer/digital devices. Those items that are within the scope of this warrant may be copied and retained by investigative officers.

As required by California Penal Code Section 1546.1 (d); any information obtained through the execution of this warrant that is unrelated to the objective of the warrant shall be sealed and shall

not be subject further review, use, or disclosure absent an order from the Court. Early screening of all material will be conducted to establish whether or not such material is privileged under the attorney/client privilege. Those materials that have been screened will be turned into the court and subject to review at a hearing to be noticed once the search is complete.

If no evidence of criminal activity is discovered relating to the seized property and associated peripherals, the system will be returned promptly.

I declare under penalty of perjury, under the laws of the State of California, that foregoing facts are true and correct to the best of my knowledge and belief.

  
Special Agent Supervisor Reye Diaz 10/20/16  
 10/20/16  


Reviewed by David Bass via Email  
California Deputy Attorney General

