

IN THE SUPREME COURT OF THE STATE OF NEVADA

APRIL PARKS,

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

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Elizabeth A. Brown
Clerk of Supreme Court
Supreme Court Case No. 82876

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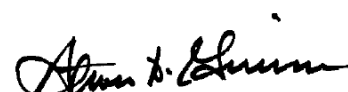
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CLERK OF THE COURT

NSF

PET
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DISTRICT COURT

CLARK COUNTY, NEVADA

In the Matter of the Guardianship)	CASE NO. G- 12 - 037414 - A
of the Person and Estate of:)	DEPT. NO. E
ELIZABETH INDIG)	
)	
)	Date of Hearing: 07/11/12
Adult Ward.)	Time of Hearing: 10:00 a.m.
)	

**PETITION FOR APPOINTMENT OF TEMPORARY
AND GENERAL GUARDIAN OF THE PERSON AND ESTATE**

COMES NOW, the Petitioner, APRIL L. PARKS, by and through her Attorney, NOEL PALMER SIMPSON, ESQ., of the PALMER LAW GROUP, PLLC, in accordance with Chapter 159 of the Nevada Revised Statutes, whose petition respectfully represents the following to this Honorable Court:

1. That Petitioner, APRIL L. PARKS, a Certified Guardian, would like to be appointed as Temporary and General Guardian of the Person and Estate of ELIZABETH INDIG, an Adult Ward.

2. That Petitioner's mailing address is 1022 Nevada Hwy., Ste. 110, Boulder City, Nevada, 89005.

3. That Petitioner's date of birth is [REDACTED] 1965.

4. That Petitioner has not been judicially determined to have committed abuse, neglect or exploitation of child, spouse, parent or other person. That Petitioner has never been

1 convicted of a felony, nor suspended for misconduct or disbarred from the practice of law, the
2 practice of accounting or any other profession which involves the management or sale of money,
3 investments, securities or real property and requires licensure in Nevada or any other state.

4 5. That Petitioner is competent and capable of acting as Guardian of the Person and
5 Estate of the Proposed Ward, and hereby consents to act in this capacity.

6 6. That the Proposed Ward, ELIZABETH INDIG, was born on [REDACTED] 1922, and is
7 Eighty Nine (89) years of age. She is a resident of the State of Nevada.

8 7. That the Proposed Ward is currently residing at Harmon Medical and Rehab
9 Hospital, 2170 E. Harmon Ave., Las Vegas, Nevada 89119, but is in need of placement in a
10 skilled nursing facility, due to her medical condition.

11 8. Petitioner is informed and believes, and in reliance thereon, alleges that the
12 Proposed Ward has been diagnosed with atrial fibrillation, pneumonia, macular degeneration,
13 Depression, and a left frontal subdural hematoma. The Proposed Ward is legally blind and
14 severely hard of hearing and is without hearing aids.

15 There has been a reported history of abuse and threats to do harm by her daughter, also
16 known as Elizabeth Indig. The Proposed Ward has told neighbors (Nelda and Monica) that her
17 daughter has hit, jabbed and poked her, causing pain and bruising in the sternum area and
18 threatened to cut her tongue out if she ever told anyone again. The attending Physician at UMC
19 stated to Nelda that the Proposed Ward's head injury seems to be consistent with a forceful fall
20 backward and that this injury is not consistent with a simple fall.

21 The evening the Proposed Ward was taken to the emergency room at UMC with a head
22 injury, her home was ransacked and approximately \$1,000.00 is missing. Although this incident
23 was never reported by the Proposed Wards daughter, Elder Protective Services is currently
24 conducting an investigation and has turned the matter over to Metro. The police report states that
25 there was no apparent forced entry into the Proposed Ward's home. In separate incidents, the
26 Proposed Ward claims her daughter has stolen approximately \$10,000.00 in cash and numerous
27 jewelry items from her in the past year, and sold her car on or about April 6, 2012, for
28 approximately \$1,700.00. When asked for the money, she reportedly became verbally abusive.

1 The Proposed Ward does not know which bank her accounts are with or how much
2 income she receives, as her daughter has taken control of all finances. At times the phone, power,
3 gas and water have been shut off due to non-payment.

4 9. In accordance with NRS 159.0523 and 159.0525, this Petition is accompanied by
5 a Physician's Affidavit from Dr. Gonsaures, dated June 6, 2012, attached hereto as **Exhibit**
6 **"3."** Dr. Gonsaures is a physician who is licensed to practice in Nevada and who states that the
7 Proposed Ward is unable to respond to a substantial and immediate risk of physical harm, is
8 likely to cause harm to either herself or others, and is at risk for financial loss and/or
9 exploitation. Additional documentation is provided to further explain the urgency of the
10 situation.

11 10. Without the appointment of a Temporary Guardian, the Proposed Ward will not
12 be able to continue with the care, supervision or continued assistance of others, and she will be
13 unable to satisfy the need for nourishment, personal or medical care, shelter, self-protection or
14 safety. Based upon her medical condition, there exists a reasonable probability that death, serious
15 bodily injury, or physical debilitation, will occur unless the Proposed Ward receives adequate
16 treatment and care. Further, without the authority of a Temporary Guardian to obtain financial
17 information on behalf of the Proposed Ward, and access any funds that she may have to pay for
18 her expenses, she is unable to apply for assistance from state and federal agencies if necessary, or
19 respond to an immediate risk of financial exploitation.

20 11. This Guardianship is not sought for the purpose of initiating litigation, nor is the
21 Proposed Ward a party to any pending criminal or civil litigation.

22 12. To the extent known, the Proposed Ward has assets and income as set forth on
23 Exhibit "1." Petitioner will file an Inventory of Guardianship assets within sixty (60) days of
24 their appointment as Guardians in accordance with NRS 159.085.

25 13. Petitioner affirms that she has actually notified, or in good faith has tried to notify,
26 those persons entitled to notice pursuant to NRS 159.047, or declares that notice to those persons
27 is not feasible under the circumstances. The names and last known addresses of the Proposed
28 Ward and relatives of the Proposed Ward are attached hereto as Exhibit "2".

AA 0629

1 14. The Petitioner requests that all existing powers of attorney, if any, executed by the
2 Proposed Ward be revoked, and that no bond be in effect.

3 15. To enable the Petitioner to carry out the function of General Guardian of the
4 Person and Estate of ELIZABETH INDIG, Petitioner requests that all the powers set forth in
5 NRS 159.077 through 159.305 be vested in the General Guardian.

6 16. That it is in the best interest of the Proposed Ward that APRIL L. PARKS be
7 appointed as Temporary and General Guardian of the Person and Estate of ELIZABETH INDIG.

8 17. An extension of the Temporary Guardianship is sought until such time as this
9 Court may hold a hearing on the General Guardianship. Said extension is required because the
10 Proposed Ward's medical and mental condition renders him unable to care for himself medically
11 or financially, until a General Guardian is appointed.

12 WHEREFORE, Petitioner prays for an Order of this Court as follows:

13 1. That the Court appoint APRIL L. PARKS, as Temporary Guardian of the Person
14 and Estate of ELIZABETH INDIG.

15 2. The Court order the Clerk of the Court to issue Letters of Temporary
16 Guardianship to APRIL L. PARKS, upon her taking the oath required by law, without bond, and
17 without proof of blocked accounts being required upon issuance.

18 3. That the Temporary Guardian of the Person and Estate of ELIZABETH INDIG
19 shall be authorized to secure medical assistance for the Proposed Ward, including treatment
20 and/or placement in appropriate surroundings to provide for that care.

21 4. That APRIL L. PARKS be appointed as Temporary and General Guardian of the
22 Person and Estate of ELIZABETH INDIG and authorized to obtain confidential medical and
23 financial information and secure the funds of the Proposed Ward, if any, wherever located. This
24 authority includes, but is not limited to, closing accounts in the Proposed Ward's name, opening
25 of a guardianship account, and placing said funds into a said accounts for the payment of the
26 expenses of the Proposed Ward.

27 5. That a one-time release of \$10,000.00 to the Temporary Guardian from the
28 Proposed Ward's financial accounts be authorized for the payment of the Proposed Ward's

1 expenses, whether said accounts or records reflect the name of the Proposed Ward individually,
2 or with one or more persons or trust. Any blocked accounts shall remain blocked account until
3 further Order of the Court. The financial institutions subject to this Court Order include, but are
4 not limited to, Bank of America, Wells Fargo, Nevada State Bank, Nevada Federal Credit Union,
5 Citibank, Clark County Credit Union, Silver State Credit Unit, Chase, or any other financial
6 institution or successor in interest thereto, authorized to do business in the United States.

7 6. That pursuant to NRS 159.105 and 183, the Temporary and General Guardian
8 shall be allowed reasonable compensation for her services as Temporary Guardian and shall be
9 allowed the necessary and reasonable expenses incurred in exercising her authority and
10 performing her duties as Temporary Guardian.

11 7. That the Temporary and General Guardian may hire an attorney to represent her
12 with said attorney allowed necessary compensation and reasonable expenses for services
13 rendered on behalf of the Temporary Guardian under NRS 159.105, 107, and 183.

14 8. That all existing powers of attorney executed by the Proposed Ward shall be
15 revoked.

16 9. That the Temporary and General Guardian shall have full access to any and all
17 medical records and information concerning the past and present condition and historical
18 treatment of the Proposed Ward, which are or may be lodged with any persons, family members
19 and friends, along with any and all medical providers, physicians, hospitals, care facilities and/or
20 institutions.

21 10. That the Temporary and General Guardian shall have full access to all historical
22 and current financial information for the Proposed Ward. Such information shall include, but not
23 be limited to, statements, cancelled checks, withdrawal authorizations and other information
24 from banks, financial institutions, brokerage or mutual fund firms, the United States Social
25 Security Administration and other persons and agencies which have engaged in transactions
26 concerning the financial affairs of the Proposed Ward, whether said accounts or records reflect
27 the name of the Proposed Ward individually, or with one or more persons or trust and shall
28 specifically include information as to the Proposed Ward's account(s) with Bank of America,

Wells Fargo, Nevada State Bank, Nevada Federal Credit Union, Citibank, Silver State Credit Unit, Clark County Credit Union, Chase, or any other institution, or successor in interest thereto.

11. That the Temporary and General Guardian shall be authorized to request and receive information from any other person or agency which is currently or has previously been involved in the Proposed Ward's welfare, including but not limited to caregivers, doctors (past and present) friends and family.

12. Petitioner requests authorization to use the assistance of the Henderson Police Department, Las Vegas Metropolitan Police Department, or any other law enforcement agency, fire department, ambulance service, and/or medical personnel, in securing the Proposed Ward, and her estate, and removing, or preventing access to same, by persons alleged to be exploiting the Proposed Ward, is such assistance is necessary.

13. An extension of the Temporary and General Guardianship is sought until such time as this Court may hold a hearing on the appointment of APRIL L. PARKS as General Guardian of the Person and Estate of ELIZABETH INDIG. Said extension is required because the Proposed Ward's medical condition renders her unable to care for herself medically or financially, until a General Guardian is appointed.

14. That in the unlikely event the instant Petition be denied, that the Court issue an Order to Shorten Time allowing the General Guardianship hearing to be held no later than ten days from the date of this Petition, on the Petition for General Guardianship.

15. For such other further relief as the Court may deem proper and just.

DATED this 12th day of June, 2012.

PALMER LAW GROUP, PLLC

By: /s/ Noel Palmer Simpson

NOEL PALMER SIMPSON, ESQ.

Nevada Bar No. 9642

2460 Professional Court, Suite #110

Las Vegas, NV 89128

Attorney for Petitioner

AA 0632

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EXHIBIT "1"
ASSETS AND/OR INCOME

ASSETS

The Proposed Ward's assets are unknown to Petitioner at this time

MONTHLY INCOME

The Proposed Ward's income is unknown to Petitioner at this time.

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EXHIBIT "2"
NAMES, ADDRESS, AND RELATIVES OF PROPOSED WARD
AND OTHER ENTITLED TO NOTICE

ELIZABETH INDIG
c/o Harmon Medical and Rehabilitation Hospital
2170 E. Harmon Ave.
Las Vegas NV 89119
Proposed Ward

April L. Parks
1022 Boulder Hwy. #101
Boulder City, Nevada 89005
Certified Guardian and Proposed Guardian

ELIZABETH INDIG
43 Pangloss Street
Henderson, Nevada 89002
Daughter of Proposed Ward

There are no other known relatives or persons entitled to Notice under pursuant to NRS 159.047

VERIFICATION

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

APRIL L. PARKS, being first duly sworn, under penalty of perjury, deposes and says:

I am the Petitioner in the above-entitled action; I have read the foregoing PETITION FOR APPOINTMENT OF GENERAL GUARDIAN OF THE PERSON AND ESTATE; and I know the contents thereof; the same is true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters I believe them to be true.



APRIL L. PARKS

SUBSCRIBED and SWORN to before
me this 7th day of June, 2012.



NOTARY PUBLIC in and for said
County and State

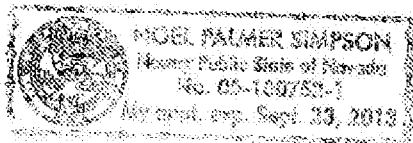


EXHIBIT “3”

AA 0636

**CERTIFICATE OF INCAPACITY AND REGARDING
THE NEED FOR GUARDIANSHIP**

In accordance with NRS 159.044(2)(f):

I, Pierre Gonsaves, (your name), am:

- ☒ A physician licensed to practice in the State of Nevada
☐ A physician employed by the Department of Veterans Affairs
☐ Employed by _____ (name of agency).
A governmental agency in the State of Nevada who conducts investigations.
☐ Employed by _____ (name of agency).
The title of my position is _____ and I qualify
to execute this Certificate for the following reasons:

It is my opinion that the adult patient, Elizabeth Indig, suffers from a
diagnosis of: Mammary Brain Injury

It is my opinion that this patient ☐ is or ☐ is not a danger to himself/herself or to others:

It is my opinion that (check all that apply):

- ☐ The patient is able to attend the guardianship Court hearing.
☒ The patient would not comprehend the reason for the Court hearing or be able to
contribute to the proceeding.
☐ Attending the Court hearing would be detrimental to the patient.

It is my opinion that this patient:

- ☐ is or ☒ is not capable of living independently;
☐ with or ☐ without assistance. If patient requires assistance, please explain:

(b)(6)/(b)(7)(C) Certificate of incapacity)

AA 0637

In accordance with NRS 159-052 (1)(a):

It is my opinion that this patient is unable to respond (check all that apply):

- ☒ To a substantial and immediate risk of physical harm
- ☒ To an immediate need for medical attention
- ☒ To a substantial and immediate risk of financial loss
- ☐ None of the above

It is my opinion that this patient:

- ☒ Is or has been subject to abuse, neglect or exploitation
- ☐ Has not been subject to abuse, neglect or exploitation

In accordance with NRS 159.044:

It is my opinion that this patient needs a guardian of:

- ☐ Person (only)
- ☐ Estate (only)
- ☒ Person and Estate

Dated this 6th day of June, 2008

(Physician's Signature)

P. Goncalves MD
License #13624
Ph 702-877-8600

(Printed Name)

(Physician's Signature of Incapacity)



Armory Health
1701 W. Charleston
Las Vegas, NV 89012
702.251.8000

INDIG, ELIZABETH
MR #: 137221-01
Curr Admit: 05/25/2012 DOB: 07/09/1922
Primary Phys: Medical Southwest

Capacity B
2/11/22/B

Location:	HARWIN KENAS 222B
Time at Location:	11:01
Assessor:	WCS
Name of Contact:	Arthur H.
Contact Phone #:	251-8000

Decision-Making Capacity Assessment

Patient Name:	ELIZABETH INDIG	Date:	6-4-2012
Insurance:	HPN	Sex:	Old
Address:	45 Pangles Street Anderson, NV 89002	Phone:	702- XXXXXX
DOB:	XXXXXX 922	Age:	89
SSN:	XXXXXXXXXX		

Ethnicity: ☒ White ☐ Black ☐ Native Am. ☐ Hispanic/Latino ☐ Asian Am. ☐ Other

Marital Status: ☒ Single ☐ Married ☐ Widowed ☐ Divorced/Separated ☐ Never Married

Does the patient have any current medical conditions? ☐ No ☒ Yes.

If yes, please describe:

ATRIAL FIB, UTI, PNEUMONIA, Hx of BACK & SPINE SURGERY,
HTN, MACULAR DEGENERATION, DEPRESSION, Hx of FALL w/
BILATERAL SUBARACHNOID & @ FRONTAL & SUBDURAL HEMATOMA.

Referral Background:

89 y.o. FM referred for a capacity evaluation &
assess pt's abilities to make independent & healthcare decisions.

PT RESIDES ALONE

to to which individual understands their condition, who is providing treatment, and the proposed treatment in
al terms. In addition, the degree to which the individual understands the risks and benefits of that treatment
and with receiving no treatment

L was disoriented. She could not discuss her medical
history in general terms. She could not discuss
risks/benefits of continuing/discontinuing of
medical treatment.

No. 73

62962800
FUNDAMENTAL

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AA 0639

SUPP 0464

1/08/2006 20:30

Relevant Factors (Describe)

Family History of Dementia ☐ No ☐ Yes *unk - pt could not respond*

Recent Significant Loss: ☐ No ☐ Yes *unk - pt could not respond*

Substance Abuse: ☒ No ☐ Yes *med record noted none*

History of Psychiatric Illness: ☐ No ☐ Yes *unk - Hx of depressive-neurotic in med rec.*

Lack of Social Support: ☒ No ☐ Yes *family present*

Drop in Financial Status: ☒ No ☐ Yes *none noted*

Psychological Turmoil: ☒ No ☐ Yes *none noted*

Suicide History in Family: ☐ No ☐ Yes *unk - pt could not respond*

History of Suicidal Ideations: ☐ No ☐ Yes *unk - pt could not respond*

Suicide Risk

☒ None

☐ LOW-Vague ideation; No clear plan/intent; No recent attempts

☐ MEDIUM-Frequent ideation; Non-lethal Plan; Vague intent; History of previous attempts

☐ HIGH-Intense ideation; Imminent action; Lethal Plan; Means available; Recent prior attempts

Homicidal Risk

☒ None

☐ LOW-Vague ideation; No clear plan/intent; No recent attempts

☐ MEDIUM-Frequent ideation; Non-lethal Plan; Vague intent; History of previous attempts

☐ HIGH-Intense ideation; Imminent action; Lethal Plan; Means available; Recent prior attempts

Mental Status

Impaired Reality Testing:

☐ Reality Oriented ☐ Delusions of Grandeur ☒ Confusion

☐ Auditory Hallucination ☐ Paranoid Delusions ☐ Suspiciousness

☐ Visual Hallucination ☐ Religious Delusions ☐ Evasiveness

☐ Command Hallucination ☐ Persecutory Delusions ☒ Memory Problems

☐ Tactile Hallucination ☐ Perceptual Disturbance ☐ Dementia

☐ Disassociative Episodes ☐ Obsessions ☐ Impulse Control

Alterations in Mood/Affect: ☒ None *none observed - affect bright*

☐ Dependent ☐ Anger ☐ Hopelessness ☐ Tired

☐ Sad ☐ Labile ☐ Guilt ☐ Worthlessness ☐ Withdrawn

☐ Mania ☐ Loss of Pleasure ☐ Libido Change ☐ Phobias

☐ Somatic Symptoms ☐ Other _____ Length of Symptoms _____

Weight	<input checked="" type="checkbox"/> Normal	<input type="checkbox"/> Very Thin	<input type="checkbox"/> Thin	<input type="checkbox"/> Heavy	<input type="checkbox"/> Obese
Height	<input checked="" type="checkbox"/> Normal	<input type="checkbox"/> Very Tall	<input type="checkbox"/> Tall	<input type="checkbox"/> Short	<input type="checkbox"/> Very Short
Hygiene	<input checked="" type="checkbox"/> Good	<input type="checkbox"/> Fair	<input type="checkbox"/> Poor	<input type="checkbox"/> Very Poor	
Dress	<input checked="" type="checkbox"/> Appropriate	<input type="checkbox"/> Inappropriate	<input type="checkbox"/> Inappropriate	<input type="checkbox"/> Inappropriate	<input type="checkbox"/> Inappropriate

No. 7330 - 8 2/4

AA 0640

FUNDAMENTAL
6296200

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SUPP 0465

PAGE 05/08

APPEND

Inter: ☒ Friendly ☐ Shy ☐ Withdrawn ☐ Hostile ☐ Capacity E

Mood: ☒ Calm ☐ Anxious ☐ Depressed ☐ Angry ☐ Guarded

Affect: ☒ Appropriate ☐ Inappropriate ☐ Flat ☐ Labile ☐ Euphoric

Speech: ☐ Normal ☐ Slow ☐ Fast/Rapid ☒ Soft Spoken ☐ Loud

Thought Processes: ☐ Logical ☐ Tangential ☐ Loose Assoc. ☐ Racing ☐ Pressured

Thought Content: ☐ Normal ☐ Delusional ☐ Obsessive ☐ Paranoid ☐ Grandiose

☐ Hallucinations ☐ Negativistic ☐ Normal ☒ Short Attention

☒ Distractible ☐ Hyper Vigilant ☐ Obsessive Detail *unable to assess fully*

Memory:	<input type="checkbox"/> Good	<input type="checkbox"/> Fair	<input type="checkbox"/> Poor	<input checked="" type="checkbox"/> Impaired	
Judgment:	<input type="checkbox"/> Good	<input type="checkbox"/> Fair	<input type="checkbox"/> Poor	<input checked="" type="checkbox"/> Impaired	<input type="checkbox"/> Impulsive
Insight:	<input type="checkbox"/> Good	<input type="checkbox"/> Fair	<input type="checkbox"/> Poor	<input checked="" type="checkbox"/> Impaired	

Orientation (Time, Place, Person, Circumstance): ☐ X 4 ☐ X 3 ☐ X 2 ☒ X 1 Deficits *Time, place, circumstance*

MMSE Score: *Seven Impairment*

Impairments on MMSE *orientation, mental control, general fund of information*

Activities of Daily Living (use for independent living referral questions)

IADL

	INDEPENDENT	NEED HELP
TELEPHONE USE Two weeks prior to admission, did you need help using the telephone (e.g., looking up numbers or dialing)?		<input checked="" type="checkbox"/>
SHOPPING FOR GROCERIES Two weeks prior to admission, did you need help with shopping for groceries?		<input checked="" type="checkbox"/>
TRANSPORTATION Two weeks prior to admission, did you need help getting to places that required a car or public transportation (e.g., going to the grocery store, church)?		<input checked="" type="checkbox"/>
MEAL PREPARATION Two weeks prior to admission, did you need help preparing your own meals?		<input checked="" type="checkbox"/>
HOUSEWORK Two weeks prior to admission, did you need help doing your housework?		<input checked="" type="checkbox"/>
TAKING MEDICATIONS Two weeks prior to admission, did you need help taking your medication (e.g., to take them at the correct time or to sort the pills)?		<input checked="" type="checkbox"/>
HANDLING FINANCES Two weeks prior to admission, did you need help with your finances (e.g., handling money, paying bills, or balancing the checkbook)?		<input checked="" type="checkbox"/>

Comments:

Bed mobility - MAY ASSIST, Transfers - MAX ASSIST

ADL's - NT

AA 0641

Summary

Based on the professional opinion of this assessor in light of the information available from the chart review and the clinical interview, the individual...

- ☐ has the capacity for independent decision-making capacity
☒ does not have the capacity for independent decision-making
☐ opinion deferred

Currently, pt presented w/ severe cognitive impairment. Within the scope and limitation of this evaluation this kind woman currently lacks the capacity for independent healthcare decisions.

Provisional Diagnostic Impressions:

Axis I Cognitive Disorder NOS

Axis II Dementia

Axis III See LIST PAGE ONE

See page one and facility medical record

- Axis IV
- | | | | |
|--|--|---|---------------------------------------|
| <input type="checkbox"/> primary support | <input checked="" type="checkbox"/> access/health care | <input type="checkbox"/> social environment | <input type="checkbox"/> occupational |
| <input type="checkbox"/> legal/crime | <input type="checkbox"/> educational | <input type="checkbox"/> domestic violence | <input type="checkbox"/> bartavement |
| <input type="checkbox"/> physical abuse | <input type="checkbox"/> housing | <input type="checkbox"/> economic | |
| <input type="checkbox"/> marital/family | | | |

Axis V Current GAF 30 Highest Past Year

Wk App PM

6-4-2012

Date

Document Received by:

Date

For additional consultation contact

Carl Williams, PhD, Senior Clinical Director
(702.351.8000)

Stacey Smiley, Manager of Care Coordination
(702.405.2219)

Jennifer Riedel, MSW, COO

AA 0642

6-4-2012

1 SPMSO

COMPLET : 500

FOIA b 7 - D

When recorded mail to:

Elizabeth Indig
43 Pongloss St.
Henderson, NV 89002



**REVOCATION OF POWER OF
ATTORNEY**

KNOW ALL PERSONS BY THESE PRESENTS:

That I, Elizabeth Indig, residing in Henderson, Nevada do hereby revoke that any and all

Powers of Attorney executed on an unknown date and recorded in Book No. unknown.

Instrument No. unknown at Clark County, State of NEVADA by which Elizabeth Indig

appointed Elizabeth Diana Indig Attorney-in-Fact for purpose in said Power of Attorney set

forth. Said Power of Attorney is hereby revoked, cancelled and annulled.

DATED

3-6-12

SIGNED

Elizabeth Indig

Elizabeth Indig

State of Nevada
County of CLARK

This instrument was acknowledged before me by Elizabeth Indig on 3-6-12

Christy A. Beckwith

NOTARY PUBLIC, in and for said State.



CHRISTY A. BECKWITH
Notary Public
State of Nevada
Appt. No. 94-3016-1
My Appt. Expires Feb. 22, 2014



Admission Date: 05/25/2012 22:42 (PT)

Patient Name: ELIZABETH INDIG

MRN: 3315218

Account Number: [REDACTED]

Location: HARMON MEDICAL AND
REHABILITATION CENTER / 222
B

June 4, 2012

RE: Elizabeth Indig [REDACTED]

Nelda Cook-POA (702) 566-1157 or (702) 336-6620

Monica Humphrey-Long time friend (702) 279-2017 or (702) 254-1632

Elizabeth is 89 y/o legally blind and extremely hard of hearing with the use of hearing aids that can not be located. I am reporting a concern of abuse concerning this patient Elizabeth Indig DOB [REDACTED] 922. I am concerned there is abuse by this patient's daughter, Elizabeth Indig. On May 16, 2012 this patient was with her daughter in the car at approximately 9:30 pm the patient and her daughter arrived at the patient's residence at 43 Pangloss St Henderson, NV 89002 and the patient's daughter parked the car in the driveway claiming that the garage door opener did not work. The patient's daughter told the patient she needed to use the restroom and she would be right back out to get her and to stay in the car. The patient waited in the car. (according to the patient's friends who drive the patient around, the patient would never get out of the car on her own at night because of the blindness and being unable to navigate her way to the door from the car that was parked in the steep driveway) According to Nelda, the patient told Nelda that she would be asking her daughter for the \$10,000 at dinner the evening of May 16, 2012, the patient's daughter stole from the patient last year. According to the POA, the patient has not had a history of losing consciousness; however, there has been a reported history of violence against the patient by her daughter. The patient reported to Nelda and Monica that her daughter has hit her, poked her, jabbed her causing pain and bruising in the sternum area and threatened to cut her tongue out if she ever told anyone again. LSW, Heather Duckworth, asked the patient if there has been a history of physical violence and threats to do harm by her daughter to the patient in the past and the patient reported yes. The patient's head injury seems to be consistent with a forceful fall backward and the doctor at UMC told Nelda that this injury is not consistent with a simple fall. I have asked the current doctor to corroborate this finding.

Nelda reports that the patient's daughter, Elizabeth sold the patient's car around April 6, 2012 for approx. \$1700 and when the patient asked her daughter for the money her daughter became verbally abusive toward the patient. In addition, again the patient asked for her money and her daughter shoved her fist into the patient's sternum causing bruising and lingering pain and giving her some cash, according to the patient. Not too long afterward, the patient called Nelda to ask her if she would drive her to the doctor office to pay for and pick up her hearing aids. Nelda reports she drove the patient to the doctor office and she had the \$700 in cash. She said the patient would typically ask Nelda to identify the bills she was pulling out of her wallet and to assist in counting the proper amount.

According to Monica and Nelda, the patient does not know what bank she banks with, how much money she gets per month or how much money she actually has, if any, as her daughter has taken complete control over everything as she has the same name as the patient. The patient has had various times that the phone, power, gas, and water were shut off due to non-payment. The concern is that the patient's daughter spends the patient's income at the casino that she reportedly goes to every week from Thursday to Sunday and that her daughter is using her income and assets to support her addiction. The long time friends have a concern that this accident is not a coincidence as it happened on a Wednesday and the patient's home was ransacked with no forced entry on the same evening after the patient was taken to the ER. The patient's daughter did not call to report this to the police when asked. Reports are that the patient had \$1000 in cash that she stashed in the home. According to Nelda, the patient reported that her jewelry has been stolen by the patient's daughter and was upset about all of the money and jewelry that has been taken by her own daughter recently and advised her friends she would be asking her daughter to pay her back.

I am attaching the patient's medical reports and summaries from the sending facilities and the H&P from our facility for your review of this case.

I am also requesting a new EPS investigator/social worker be assigned to this case for a fresh perspective.
Heather Duckworth, LSW

Signature: [REDACTED]

Signature:

[Handwritten Signature]

Date Signed:

6/4/12

Signed By:

Position:

Phone Number:

Pager Number:

Allscripts Generated (Scan)



Admission Date: 05/25/2012 22:42 (PT)
 Patient Name: ELIZABETH INDIG
 MRN: 3315218
 Account Number: [REDACTED]
 Location: HARMON MEDICAL AND
 REHABILITATION CENTER / 222
 B

Social Worker Text Note

Last Saved By: Heather Duckworth Last Saved On: 06/04/2012 09:16 (PT)
 Created By: Heather Duckworth Created On: 06/04/2012 09:16 (PT)

Patient Information

Patient Name: ELIZABETH INDIG MRN: 3315218
 Address: 43 PANGLOSS ST
 HENDERSON, NV 89002 SSN: [REDACTED]
 Home Phone: (702) [REDACTED] DOB: [REDACTED] 922 (age 39 years)
 Work Phone: Gender: Female
 Alternative Phone: Marital Status: Married

Admission Information

Admission Date: 05/25/2012 22:42 (PT) Account Number: C08800010182-P-3315218-20120525282144
 Readmit: No Service: CCG
 Patient Type: Elective Facility: HARMON MEDICAL AND REHABILITATION
 CENTER
 Primary Dx: Other and unspecified fall Location: HARMON MEDICAL AND REHABILITATION
 CENTER / 222 B
 Secondary Dx: Attending Physician: PIERRE J GONSALVES
 Final DRG: Admit Source:

Financial Information

Financial Class:
 Primary Plan Desc: SENIOR DIMENSIONS MA PD SO NV Primary Plan Number: MRLV6000

Social Worker Text Note

Social Worker Note:

Late Entry: 5/30/2012

LSW received a call from the patient's EPS worker Renee DeRosa. The worker reports she has "unsubstantiated the case". Ms. DeRosa reports she will come to the hospital to attempt to interview the patient today. Later, LSW met with concerned friends and POA, Nelda and Monica. The friends reported physical, financial, and emotional abuse of the patient by her daughter Elizabeth Indig. They report concerns over their EPS worker Renee DeRosa; however, met with her in my office to discuss their concerns. LSW felt that Ms. De Rosa was apathetic to the friends who reported abuse and acted inappropriately while conducting an interview with these individuals. LSW subsequently called Ms. DeRosa's supervisor Tammy to report this inappropriate behavior and interview.

6/4/2012: LSW did a full EPS report complete with the H&P and the DC summary from the send facilities and faxed it to the Division of Aging requesting another investigation to be done by another EPS worker. Heather Duckworth, LSW

Signature

Signature:

Date Signed:

6/4/12

Signed By:

Position:

Phone Number:

Pager Number:

Allscripts Generated (Scan)

EVENTS & ORDERS OF THE COURT

09/04/2014 | **Hearing for Account and Report** (1:30 PM) (Magistrate Norheim, Jon)
09/04/2014, 10/02/2014, 11/06/2014, 12/04/2014

Notice of Hearing of First Annual Accounting and Report of the Guardian

Minutes

09/04/2014 1:30 PM

- HEARING FOR ACCOUNT AND REPORT Also present: Elizabeth Indig, daughter of the ward; and Kristina Braverica, family friend of the ward. The Guardianship Commissioner was sitting under direction and in lieu of the Guardianship Judge. Elizabeth Indig (daughter of the ward) asserted her objection to the accounting, describing her concerns regarding the expenses listed, the handling of the ward's home and related expenses, and the sale of the personal property from the home. Ms. Indig requested that invoices be produced. Additionally, Ms. Indig expressed great concern regarding the management of the guardianship and issues regarding the ward's trust. Court noted that it had not been requested that the Court take jurisdiction over the trust. Court and participants engaged in discussion regarding the establishment and history of the guardianship and several of the issues raised by Ms. Indig; Court encouraged Ms. Indig to file a Petition to be appointed guardian and explained the process for her to seek the appointment. COMMISSIONER RECOMMENDED, as follows: 1. The Guardian shall provide a Supplement regarding the trust assets; 2. The Guardian shall provide the invoices/receipts as requested to Ms. Indig by 9/12/14; 3. Matter CONTINUED to 10/2/14 at 1:30 p.m. for further review of the Accounting and for Ms. Indig's Petition to be Appointed Guardian.

10/02/2014 1:30 PM

- HEARING FOR ACCOUNT AND REPORT Also present: Elizabeth Indig, daughter of the ward; Kristina Braverica, family friend of the ward; and Randy Hall, friend of the ward's daughter. The Guardianship Commissioner was sitting under direction and in lieu of the Guardianship Judge. Court and participants engaged in discussion regarding the care and placement of the ward;

Elizabeth's concerns regarding potentially seeking appointment to be General Guardian; possible resources where Elizabeth may seek free or discounted legal advice and/or services; Elizabeth's and Randy's allegations of misappropriation of the ward's estate and trust funds by the current guardian; identification of items that Elizabeth and Randy are specifically concerned about in the Guardian's Accounting; the history of the case; service; the ward's Medicaid eligibility; and the distinction between the ward's estate assets and trust assets. Upon inquiry from the Court, Court and participants were able to identify the following concerns still held by Elizabeth and Randy: A. Possible inaccuracies in the Accounting; B. If the ward's personal property was sold at less than fair market value; C. Guardianship Fees and Attorney Fees specified in the Accounting. Following further discussion, Court and participants identified documents that have already been provided and documents that shall be produced by each side prior to the next hearing. Court and participants engaged in discussion regarding setting the date for the next hearing. Court advised that another hearing master could hear the matter if the parties wished to expedite the case; the parties all agreed that their preference was to set the case one week further out and have this Commissioner continue to hear the matter. COMMISSIONER RECOMMENDED, as follows: 1. The Guardian shall provide the following for review: - copies of bank statements - Medicaid letter - Inventory of the household items and any sale receipts from the estate sale company - copies of cancelled checks - copies of cancelled medical bills - documentation of the health insurance premium - the attorney's itemized statement 2. Elizabeth Indig shall file a copy of the Trust and serve a copy on the Guardian; 3. Matter CONTINUED to 11/6/14 at 2:30 p.m.

11/06/2014 2:30 PM

- HEARING FOR ACCOUNT AND REPORT
Petitioner, April Parks, was present and represented by Ethan Kottler, Esq. (Bar #5693). Ward's daughter, Elizabeth Indig, was present. Ward's daughter's friends, Randy Hall and Kristina

Braverica, were also present and seated with Elizabeth Indig. The Guardianship Commissioner was sitting under direction and in lieu of the Guardianship Judge. The Court inquired about the requested documents from the last hearing. Ward's daughter reported that she submitted the Trust. The Court confirmed receipt and review of the Trust. Mr. Kottler informed the Court that the bank will produce the bank statements tomorrow. Upon Court inquiry, the parties confirmed that Ms. Simpson submitted the itemized list. Ms. Parks notified the Court that she submitted all of the requested documents to Mr. Drizin's office. Ward's daughter requested that the Court remove April Parks as the guardian and impose sanctions. The Court and Ward's daughter then discussed the possibility of her becoming the guardian. The Court and parties also discussed a Medicaid issue and an issue regarding the residence. COMMISSIONER RECOMMENDED: 1. Mr. Kottler shall provide the documents in his possession to Ward's daughter, Elizabeth Indig, as of Monday, November 10, 2014. Mr. Kottler shall provide the documents not already in his possession as he receives them. 2. Ward's daughter, Elizabeth Indig, shall provide a remedy recommendation regarding the statutory time violation allegations at the next hearing.

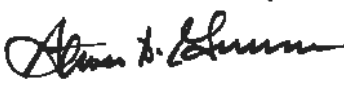
12/04/2014 3:00 PM

- HEARING FOR ACCOUNT AND REPORT Also present: Attorney Ethan Kottler, Bar #5693, representing April Parks; Kristina Braverica, family friend of the ward; and Randy Hall, friend of the ward's daughter. The Guardianship Commissioner was sitting under direction and in lieu of the Guardianship Judge. Upon inquiry from the Court, Attorney Kottler stated that all documents requested have been produced. Elizabeth Indig indicated that she believes some documents have not yet been provided and that she has not had sufficient time to review what she has been given. Attorney Kottler described the efforts made by his office to meet with Ms. Indig to go over the documents and answer any question she may have. Upon inquiry from the Court, Ms. Indig explained her reluctance to meet with Counsel. Attorney

Kottler requested the Court find Ms. Indig to be a vexatious litigant, as after several rejected attempts to meet and confer with her, she responded by filing a Motion for an Order to Show Cause; additionally, Attorney Kottler asserted that Ms. Indig has still not filed an objection to the Accounting. Court advised Ms. Indig that she is required to set forth her objections to the Accounting in writing, file it, and serve it on Counsel for the Guardian. Court and participants engaged in further discussion regarding setting the matter for Calendar Call; disclosure of witnesses and documents; the deadline for Ms. Indig to file and serve her Objection to the Accounting; and Ms. Indig's desire to have the ward returned home. Court reiterated that if Ms. Indig would like to appointed guardian of the ward, she must file a Petition for Appointment. COMMISSIONER RECOMMENDED, as follows: 1. Elizabeth Indig's Objection to the Accounting must be filed and served no later than 1/30/15; 2. Ms. Indig is to meet with Counsel for the Guardian to determine what documents Ms. Indig believes have still not been provided; 3. Matter is SET for CALENDAR CALL on 2/11/15 at 10:00 a.m. 4. The hearing on Ms. Indig's Motion for an Order to Show Cause shall be CONTINUED from 12/17/14 at 9:00 a.m. to 2/11/15 at 10:00 a.m. to be discussed at the same time as the Calendar Call; the Court shall not rule on the Motion until the Evidentiary Hearing.

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EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
03/13/2017 11:39:39 AM

CLERK OF THE COURT

THE STATE OF NEVADA,)	
)	
Plaintiff,)	
)	
vs.)	GJ No. 16AGJ151A-C
)	DC No. C321808
APRIL PARKS, MARK SIMMONS, GARY)	
NEIL TAYLOR,)	
)	
Defendants.)	
<hr/>		

Taken at Las Vegas, Nevada
Tuesday, December 6, 2016
1:06 p.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

VOLUME 1

Reported by: Danette L. Antonacci, C.C.R. No. 222

03:17 1 my account and then terminate my guardianship of you?
2 A. Okay, I see what you're saying. No, that's
3 not what April Parks did. April Parks fraudulently
4 billed wards for services rendered and when, the part
03:17 5 about the thefts, the thefts were obtained, related to
6 filing false documents with the court and false
7 misrepresentations that enabled Miss Parks to take
8 authority over a ward's assets when she had no right to
9 do so.

03:18 10 Q. Okay. And again I just want to get a sort
11 of general overview. Now all these little boxes that
12 are beneath these pictures, do these represent like we
13 talked about sort of the discreet schemes as you called
14 them?

03:18 15 A. Yes.

16 Q. So I want to go over some of these. So who
17 is the first one listed there?

18 A. Dorothy Trumbich.

19 Q. In your review of the guardianship records
03:18 20 of Miss Trumbich, as well as the documents from A
21 Private Professional Guardian's documents that you
22 seized, what happened with Miss Trumbich? So how did
23 the guardianship start and what did you discover?

24 A. In Miss Trumbich's case April Parks filed a
03:19 25 petition for guardianship where she put in the petition

03:19 1 several misrepresentations about Miss Trumbich including
2 omitting the fact that she already had in place a power
3 of attorney who was actively working to put care
4 measures in place for Miss Trumbich. The fraudulent
03:19 5 misrepresentations caused April Parks to obtain
6 guardianship over Miss Trumbich. At the time of this
7 fraudulent guardianship, Dorothy Trumbich had
8 \$167,204.49 in assets which April Parks took control of
9 and later spent a good majority on fees for herself and
03:19 10 for her attorneys.

11 Q. Do you recall what the breakdown was of the
12 amount of money that Miss Parks spent on her fees and
13 her attorney fees?

14 A. May I look at my report?

03:20 15 Q. If that would refresh your memory, please
16 do.

17 A. Yes.

18 April Parks paid herself \$12,764 in fees
19 while she paid her attorney \$10,589.40. It should be
03:20 20 worth noting that Dorothy Trumbich died three months
21 after the guardianship started.

22 Q. I was going to ask you that. So the total
23 amount of time that the guardianship was active was
24 approximately three months; is that right?

03:21 25 A. It was approximately three months, yes.

03:21 1 Q. You said in that time Miss Parks ran
2 \$12,000 you said in fees for herself?

3 A. She did.

4 Q. Now of that 167,204.49, where did the rest
03:21 5 of that go? Was there any left after Miss Trumbich's
6 death or --

7 A. Yes. So more than \$21,000 was used to pay
8 her rent at a skilled nursing facility where she was
9 living. Some of her money went toward paying a hospice
03:21 10 company for daily visits. Additional money was used to
11 pay for home health care. Additional money was used to
12 pay for lawn care. Mrs. Trumbich owned her own home.

13 And then she also spent approximately \$600 on these
14 third party caregiver companies that for approximately
03:22 15 \$20 an hour provided companionship or other services for
16 the ward. When the guardianship concluded April Parks
17 ultimately sent a check for around \$50,000 back to
18 Dorothy's estate once it went to probate court.

19 Q. Okay. So out of that 167,000 and change
03:22 20 there was about 50,000 left after these three months?

21 A. Right.

22 Q. Okay. And again just to get a broad
23 overview. The next box has the name Baxter Burns. Is
24 this another one of the wards that Miss Parks' company
03:22 25 had guardianship over?

03:22 1 A. Yes.

2 Q. How did that guardianship begin and what
3 can you tell us about it?

4 A. Baxter Burns was very similar to Dorothy
03:23 5 Trumbich. When April Parks filed her petition for
6 guardianship, it contained false representations
7 including that Mr. Burns did not already have in place a
8 power of attorney who was actively working to put care
9 measures in place for him.

03:23 10 Q. Do you know whether Miss Parks was aware of
11 that power of attorney?

12 A. I have confirmed through the investigation
13 that April Parks was fully aware of Mr. Burns' power of
14 attorney.

03:23 15 Q. Is that based on documents that you
16 reviewed from Miss Parks' office?

17 A. It is. It's also related to records I
18 obtained. It's also related to interviews that I
19 conducted.

03:23 20 Q. Okay. I interrupted you. Please continue.

21 A. Okay. So based upon April Parks' false
22 representations in her petition for guardianship, the
23 court granted guardianship for her over Mr. Burns. At
24 the time she took over as guardian Mr. Burns had

03:24 25 \$32,006.72 in assets. Miss Parks seized those assets

Jaclyn O'Malley

From: barb <barb@barnesmtncsupply.com>
Sent: Monday, July 27, 2015 7:24 AM
To: Jaclyn O'Malley
Subject: Fw: Baxter Burns

He loved. He gave.
We believe. We LIVE. John 3:16
Simple really.....

----- Original Message -----

From: mark@appgmv.com
To: barb@barnesmtncsupply.com
Cc: April Parks
Sent: Wednesday, April 25, 2012 12:05 PM
Subject: Baxter Burns

Hello Barbara,

Regarding the Bank of America account:

The starting balance was \$32,006.72
Expenses for Mr. Burns: \$27,609.11 (I believe the \$17,000.00 you were sighting was the Attorney fees and
guardianship fees listed only. The amount I am giving you is the TOTAL Expenses)
Leaving the amount of: \$4397.61
Income received: \$4,132.23
Total amount left: \$8529.84, which we sent to your attorney

I hope that clears everything up for you.

Have a nice day.

Mark A. Simmons, NCG, RFA
Qualified Dementia Care Specialist
A Private Professional Guardian
1022 Nevada Highway #110
Boulder City, NV 89005
702-629-6200
Fax: 483-4320

Confidentiality Note: This message is intended for use only by the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please contact the sender immediately and destroy the material in its entirety, whether electronic or hard copy. Thank you

Jaclyn O'Malley

From: barb <barb@barnesmtncsupply.com>
Sent: Monday, July 27, 2015 7:22 AM
To: Jaclyn O'Malley
Subject: Fw: Remainder of Baxter Burns Estate

He loved. He gave.
We believe. We LIVE. John 3:16
Simple really.....

----- Original Message -----

From: Aprillparks
To: barb
Sent: Monday, April 23, 2012 2:47 PM
Subject: Re: Remainder of Baxter Burns Estate

Barbara

We have given you everything that we were in possession of, with the exception of the guns.

I was out of town, and since the guns are only accessible by myself and you did not advise me prior to your visit but instead called the day of your visit I could hardly make myself available to you.

Our accusatory tone is not only unnecessary but unflattering. I don't want any of Mr Burns belonging nor have I ever.

The guns will only be exchanged at a local police station to you. This is how my office handles all gun transaction as I do not have the ability to insure that the persons receiving weapons are eligible to receive them according to Nevada state law.

April L. Parks, NCG

On Apr 23, 2012, at 12:42 PM, barb <barb@barnesmtncsupply.com> wrote:

Dear April,

I have tried to call on numerous occasions and you have not taken my calls. I was in town last week and you were out of town??? Anjelica and Mark both tried to help but to no avail. I did not get the correct keys for the vehicles. I had to call a lock smith to re ignition the Capric and Truck cost 291.00 for keys.

The court of Nevada stated as of March 14, all the necessary papers, documents and anything taken from the Ward should be returned to the Sucessor Trustee. Well, to this date I do not have except titles and house keys, nothing that was in the desk of Baxter Burns.

My attorney is going to take time this week to settle all this with you and Noelle. I want the guns asap. They are to be delivered to my attorney. There is no reason for me to

meet you or wait on you to have them for me. They are not yours. You are i think in contempt right now for holding onto the remainder of Baxter's belongings.

I want the KEYS (all of them), the DEED to the house, insurance policies, social security stuff, HIS WALLET, and every thing that was taken out of the roll desk by Angelica and your staff. Witnessed by all the neighbors. There is no need for you to pcess anything that is Baxter's. He has a Trust and everything is taken care of in that trust.

I am not sure why I received a check for \$8,800. or so when we were expecting \$17,000. according to Court Documents. She will get to the bottom of that as well.

Angelica tried to help and stated that i had everything that was taken out of the house. Well if that was true I wouldnt be writing you or demanding the guns keys etc.

I will be back on May 24-or 25 and I expect everything to be at the attorneys office.

Barbara Petty

>>
>>
>
>

I will be back on May 24-29th and want the guns
He loved. He gave.
We believe. We LIVE. John 3:16
Simple really.....

APRIL PARKS DISCOVERY REVIEW

<u>WARDS AFFECTED BY SCAMS (DOUBLE BILLING, UNNECESSARY SERVICES, HOUSE CHECKS, DOUBLE BILLED COURT VISITS, SHOPPING, BANK DEPOSIT, ESTATE SALE, OTHER)</u>	<u>AMOUNT TAKEN LISTED IN JUDGMENT OF CONVICTION</u>	<u>AMOUNT TAKEN DOCUMENTED IN OFFICER'S REPORTS</u>	<u>AMOUNT TAKEN THAT WAS VERIFIED BY DOCUMENTATION IN DISCOVERY</u>	<u>AMOUNTS TAKEN LISTED IN DISCOVERY or Parks Ex Parte Motion on Bail 3-8-17 (300+ page police report attached).</u>
Clyde Bowman	3,820.14	3,820.14	3,447.24	3,820.14 listed on officer's report p. 1198. Overbilled ward visits documented on p. 5632 at 3,447.24. Unable to confirm shopping trip and court visit overbilled amounts.
Delmond Foster	5,134.40	2,264.40	2,487.00	2,264.40 listed on officer's report p. 1197. Overbilled ward visits documented on p. 3955 at 2,487.00. Unable to confirm shopping trip amounts.
Delores Smith	6,346.30	6,166.30	3118.50	6,166.30 listed on officer's report p. 1199. Overbilled ward visits documented on p. 5632 at 264.00 and 2,854.50 on p. 6749. Unable to confirm shopping trip and court visit overbilled amounts.
Harold Lockwood	4,528.00	4,528.00	3,568.50	4,528.00 listed on officer's report p. 1200-1201. Overbilled ward visits documented on p. 6749 at 3,568.50. Unable to confirm shopping trip and court visit overbilled amounts.

APRIL PARKS DISCOVERY REVIEW

James Poya	6,032.50	6,032.50	4,374.30	6,032.50 listed on officer's report p. 1196. Overbilled ward visits documented on p. 3955 at 4,374.30. Unable to confirm shopping trip and court visit overbilled amounts.
Janice Mitchell	4,766.37	4,766.37	4,013.82	4,766.37 listed on officer's report p. 1198. Overbilled ward visits documented on p. 4754 at 4,013.82. Unable to confirm shopping trip and court visit overbilled amounts.
Juanita Graham	5,766.75	5,766.75	3,410.88	5,766.75 listed on officer's report p. 1199. Overbilled ward visits documented on p. 5632 at 3,410.88. Unable to confirm court visit overbilled amounts.
Marlene Homer	11,582.40	3,632.70	4,822.80	3,632.70 listed on officer's report p. 1200. Overbilled ward visits documented on p. 6749 at 4,822.80. Unable to confirm shopping trip and court visit overbilled amounts.
Mary Vitek	2,705.39	2,705.39	1,460.10	2,705.39 listed on officer's report p. 1198. Overbilled ward visits documented on p. 4754 at 1,460.10. Unable to confirm shopping trip and court visit overbilled amounts.
Norbert Wilkening	4,533.20	4,533.20	3,289.20	4,533.20 listed on officer's report p. 1201. Overbilled ward visits documented on p. 6749 at 3,289.20. Unable to confirm

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				shopping trip and court visit overbilled amounts.
Dorothy Trumbich	167,204.49	Ward not found on officer's report.	167,204.49-50,000.00=117,204.49	50,000 was returned.
Adolfo Gonzales	1,413.60	167,204.49-50,000.00=117,204.49	1,353.60	1,413.60 listed on officer's report p. 1201. Overbilled ward visits documented on p. 6749 at 1,353.60.
Carolyn Rickenbaugh	3,804.49	1,413.60	1,580.10	3,804.39 listed on officer's report p. 1197. Overbilled ward visits documented on p. 3955 at 1,580.10. Unable to confirm court visit overbilled amounts.
Gloria Schneringer	2,830.50	2,830.50	2,830.50	2,830.50 listed on officer's report p. 1198. Overbilled ward visits documented on p. 4754 at 2,830.50.
Kenneth Edwards	2,622.62	2,622.62	1,308.72	2,622.62 listed on officer's report p. 1198. Overbilled ward visits documented on p. 4754 at 1,308.72. Unable to confirm court visit overbilled amounts.
Roy Franklin	5,806.97	5,806.97	3,698.04	5,806.97 listed on officer's report p. 1199. Overbilled ward visits documented on p. 5632 at 3,698.04. Unable to confirm shopping trip and court visit overbilled amounts.
Marilyn Scholl	6,262.48	6,262.48	3,786.72	6,262.48 listed on officer's report p. 1197-1198. Overbilled ward visits documented on p. 4754 at

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				3,786.72. Unable to confirm court visit overbilled amounts.
Marie Long	10,708.45	3,952.95	4,727.10	3,952.95 listed on officer's report p. 1200. Overbilled ward visits documented on p. 6749 at 4,727.10. Unable to confirm shopping trip and court visit overbilled amounts.
Rennie North	2,074.80	1,441.80	1,286.40	1,441.80 listed on officer's report p. 1200. Overbilled ward visits documented on p. 6749 at 1,286.40. Unable to confirm court visit overbilled amounts.
Patricia Smoak	5,563.60	5,563.60	4,765.92	5,563.60 listed on officer's report p. 1197. Overbilled ward visits documented on p. 4754 at 4,765.92. Unable to confirm shopping trip and court visit overbilled amounts.
Rudy North	2,016.30	1,449.30	1,477.80	1,449.30 listed on officer's report p. 1200. Overbilled ward visits documented on p. 6749 at 1,477.80. Unable to confirm court visit overbilled amounts.
Ruth Braslow	13,180.67	13,209.60 on p. 1196	4,854.30	12,879.60 p. 11920 or 13,209.60 on p. 1196 listed on officer's reports. Overbilled ward visits listed on p. 3955 at 4,854.30. Unable to confirm shopping trip and court visit overbilled amounts.
Walter Wright	4,183.08	4,183.08	3,659.28	4,183.08 listed on officer's report p. 1199. Overbilled ward visits documented on p. 5632 at 3,659.28. Unable to confirm

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				shopping trip and court visit overbilled amounts.
William Brady	9,470.80	3,068.80	5,214.30	3,068.80 listed on officer's report p. 1197. Overbilled ward visits documented on p. 3955 at 5,214.30. Unable to confirm shopping trip and court visit overbilled amounts.
William Flewellen	4,807.61	4,807.61	4,807.61	4,807.61 listed on officer's report p. 11197.
Yoshiko Kindaichi	3,699.28	3,699.28	1,754.28	3,699.28 listed on officer's report p. 1199. Overbilled ward visits documented on p. 5632 at 1,754.28. Unable to confirm shopping trip and court visit overbilled amounts.
Norman Weinstock	15,068.18	Ward not found on officer's report.	15,068.18	
Maria Cooper	6,920.00	Ward not found on officer's report.	6,920.00	
Kenneth Cristopherson	4,290.00	Ward not found on officer's report.	4,290.00	
Joseph Massa	5,396.40	Ward not found on officer's report.	5,396.40	
Blanca Ginorio	2,497.20	Ward not found on officer's report.	Ward had 2,645.00 in bank.	

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		Ward had 2,645.00 in bank.		
Daniel Currie	8,149.70	Ward not found on officer's report.	8,149.70	P. 1161 shows he had an IRA for 47,000. No other info was found in documents.
Rita Lampa	4,311.20	Ward not found on officer's report.	4,311.20	
Barbara Neely	895.00	4,311.20	895.00	895.00 listed on officer's report
Audrey Weber	3,819.60 (200 over what officer's report said) should be 3,619.60	3,619.60	3,619.60	3,619.60 listed on officer's report p. 10445. The judgment of conviction shows 200.00 more money taken than the officer's report.
Baxter Burns	32,006.72	32,006.72		32,006.72 listed on officer's report p. 11520. \$8,529.84 was returned.
Linda Phillips	3,445.26	3,445.26	1,833.60	3,445.26 listed on officer's report p. 1201. Overbilled ward visits documented on p. 6749 at 1,833.60. Unable to confirm shopping trip and court visit overbilled amounts.
Mary Woods (John and Sally Denton)	25,278.57	25,278.57	25,278.57	
SSA SCAM	1,344.00	1,344.00	1,344.00	
BANK DEPOSIT SCAM	67,775.70	67,775.70	67,775.70	
TAYLOR COURT SCAM	74,229.90	74,229.90	74,229.90	

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TAYLOR MORTUARY/TOILET PAPER SCAM	1,405.20	1,405.20	1,405.20	
HOLIDAY GIFT SCAM 2013	1,507.50	1,507.50	1,507.50	
	<u>TOTAL AMOUNT RESTITUTION PER JOC</u>	<u>ACTUAL AMOUNT TAKEN DOCUMENTED IN OFFICER'S REPORTS</u>	<u>ACTUAL AMOUNT TAKEN DOCUMENTED IN DISCOVERY</u>	
	\$554,397.71	\$465,663.00	\$436,816.02	

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This investigation identified that the court was unaware of the double-billing activity in which PARKS and SIMMONS were engaged. When the court approved each of PARKS petitions for payment or approval of her fees, the hearing master and presiding judge relied solely on the representations that PARKS made in her petitions. Both the guardianship judge and the guardianship hearing master sitting in lieu of the judge stated clearly that had they known PARKS was billing multiple wards for the exact same time and activity they would never have approved the petitions for fees submitted by PARKS to the court. The Hearing Master stated that he relied solely on the information provided to the court by PARKS when she requested payment or confirmation of her fees. As such, since PARKS failed to tell the court that she was billing multiple wards for the same time and activity, the court was unaware that when PARKS represented in her petitions that she or her staff spent time for the benefit of one specific ward, in actual fact, the ward received benefit of only a portion of the time claimed.

PARKS, as the court appointed guardian for the 25 wards documented in this report, all of whom were vulnerable and/or elderly persons who lacked the capacity to manage their own affairs or monitor and/or approve of PARKS activities and billing, exploited her position as guardian and converted funds belonging to each ward for her own benefit through the use of a false billing scheme; namely by double-billing these wards for activities that were billed to multiple wards at the same time. This exploitation constitutes a violation of NRS 200.5099 (3) (b), a Category B felony.

SIMMONS, as the manager of APPG, exercised direction, authority and control over the employees of APPG and, along with PAKS, directed that those employees double-bill their activities for each ward, knowing that this documented activity would be used to justify and hide the exploitation of PARKS wards.

In addition to exploiting her wards, PARKS and SIMMONS embezzled funds that had been entrusted to PARKS to pay for the needs of the wards by knowingly and without lawful authority, converting ward funds to herself fees that were not earned, contrary to NRS 205.0832 (b), a category B or C felony.

PARKS transferred the funds for these double-billed activities from each individual wards bank account to her business account, held in the name of A Private Professional Guardian, LLC. From this account, PARKS utilized the funds she misappropriated to pay business expenses, salaries for her staff, and to enrich herself and her family members, several of whom were employed in her business.

1. Between 10/04/2013 and 11/04/2015, through the use of her guardianship over **James Poya**, an elderly person born 06/25/1948, **April Parks** and **Mark Simmons** converted **\$6,032.50**, belonging to Poya with the intention of permanently depriving Poya of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
2. Between 10/04/2013 and 11/04/2015, through the use of her guardianship over **James Poya**, an elderly person born 06/25/1948, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$6,032.50** belonging to Poya and entrusted to Parks for a limited use, namely to manage for the benefit of Poya, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
3. Between 04/16/2013 and 11/03/2015, through the use of her guardianship over **Ruth Braslow**, an elderly person born 07/10/1925, **April Parks** and **Mark Simmons** converted **\$13,209.60²¹**, belonging to Braslow with the intention of permanently depriving Braslow of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (c) a category B felony.
4. Between 04/16/2013 and 11/03/2015, through the use of her guardianship over **Ruth Braslow**, an elderly person born 07/10/1925, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$13,209.60** belonging to Braslow and entrusted to Parks for a limited use, namely to manage for the benefit of Braslow, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.

²¹ This figure includes all the fraudulent fees documented in the accompanying Braslow report.

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5. Between 11/03/2014 and 11/03/2015, through the use of her guardianship over **Carolyn Rickenbaugh**, an elderly person born 12/28/1942, **April Parks** and **Mark Simmons** converted **\$3,804.39**, belonging to Rickenbaugh with the intention of permanently depriving Rickenbaugh of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
6. Between 11/03/2014 and 11/03/2015, through the use of her guardianship over **Carolyn Rickenbaugh**, an elderly person born 12/28/1942, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$3,804.39**, belonging to Rickenbaugh and entrusted to Parks for a limited use, namely to manage for the benefit of Rickenbaugh, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
7. Between 04/04/2013 and 11/04/2015, through the use of her guardianship over **Delmond Foster**, an elderly person born 08/11/1930, **April Parks** and **Mark Simmons** converted **\$2,264.40²²**, belonging to Foster with the intention of permanently depriving Foster of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
8. Between 04/04/2013 and 11/04/2015, through the use of her guardianship over **Delmond Foster**, an elderly person born 08/11/1930, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$2,264.40**, belonging to Foster and entrusted to Parks for a limited use, namely to manage for the benefit of Foster, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.
9. Between 04/02/2013 and 11/04/2015, through the use of her guardianship over **William Brady**, an elderly person born 08/16/1928, **April Parks** and **Mark Simmons** converted **\$3,068.80²³**, belonging to Brady with the intention of permanently depriving Brady of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (c) a category B felony.
10. Between 04/02/2013 and 11/04/2015, through the use of her guardianship over **William Brady**, an elderly person born 08/16/1928, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$3,068.80**, belonging to Brady and entrusted to Parks for a limited use, namely to manage for the benefit of Brady, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.
11. Between 04/04/2013 and 09/03/2015, through the use of her guardianship over **Patricia Smoak**, an elderly person born 01/29/1931, **April Parks** and **Mark Simmons** converted **\$5,563.60**, belonging to Smoak with the intention of permanently depriving Smoak of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (c) a category B felony.
12. Between 04/04/2013 and 09/03/2015, through the use of her guardianship over **Patricia Smoak**, an elderly person born 01/29/1931, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$5,563.60**, belonging to Smoak and entrusted to Parks for a limited use, namely to manage for the benefit of Smoak, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
13. Between 10/24/2013 and 09/03/2015, through the use of her guardianship over **Marilyn Scholl**, an elderly person born 12/15/1934, **April Parks** and **Mark Simmons** converted **\$6,262.48**, belonging to Scholl with the intention of permanently depriving Scholl of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
14. Between 10/24/2013 and 09/03/2015, through the use of her guardianship over **Marilyn Scholl**, an elderly person born 12/15/1934, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted

²² This figure includes \$1,260.00 for double billed ward visits (reduced due to some dates counted as unnecessary services) + shopping, court and banking

²³ This figure includes \$2,506.10 for double billed ward visits (reduced due to some dates counted as unnecessary services) + shopping, court and banking

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\$6,262.48, belonging to Scholl and entrusted to Parks for a limited use, namely to manage for the benefit of Scholl, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.

15. Between 01/05/2015 and 09/03/2015, through the use of her guardianship over **Kenneth Edwards**, an elderly person born 12/04/1944, **April Parks** and **Mark Simmons** converted **\$2,622.62**, belonging to Edwards with the intention of permanently depriving Edwards of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
16. Between 01/05/2015 and 09/03/2015, through the use of her guardianship over **Kenneth Edwards**, an elderly person born 12/04/1944, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$2,622.62**, belonging to Edwards and entrusted to Parks for a limited use, namely to manage for the benefit of Edwards, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.
17. Between 09/05/2013 and 09/17/2015, through the use of her guardianship over **Gloria Schneringer**, an elderly person born 08/18/1931, **April Parks** and **Mark Simmons** converted **\$2,830.50**, belonging to Schneringer with the intention of permanently depriving Schneringer of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
18. Between 09/05/2013 and 09/17/2015, through the use of her guardianship over **Gloria Schneringer**, an elderly person born 08/18/1931, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$2,830.50**, belonging to Schneringer and entrusted to Parks for a limited use, namely to manage for the benefit of Schneringer, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.
19. Between 04/04/2013 and 09/03/2015, through the use of her guardianship over **Janice Mitchell**, an elderly person born 12/08/1937, **April Parks** and **Mark Simmons** converted **\$4,766.37**, belonging to Mitchell with the intention of permanently depriving Mitchell of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
20. Between 04/04/2013 and 09/03/2015, through the use of her guardianship over **Janice Mitchell**, an elderly person born 12/08/1937, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$4,766.37**, belonging to Mitchell and entrusted to Parks for a limited use, namely to manage for the benefit of Mitchell, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
21. Between 12/3/2013 and 12/08/2014, through the use of her guardianship over **Mary Vitek**, an elderly person born 01/21/1932, **April Parks** and **Mark Simmons** converted **\$2,705.39**, belonging to Vitek with the intention of permanently depriving Vitek of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
22. Between 12/3/2013 and 12/08/2014, through the use of her guardianship over **Mary Vitek**, an elderly person born 01/21/1932, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$2,705.39**, belonging to Vitek and entrusted to Parks for a limited use, namely to manage for the benefit of Vitek, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.
23. Between 07/05/2013 and 02/03/2015, through the use of her guardianship over **Clyde Bowman**, an elderly person born 11/08/1921, **April Parks** and **Mark Simmons** converted **\$3,820.14**, belonging to Bowman with the intention of permanently depriving Bowman of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
24. Between 07/05/2013 and 02/03/2015, through the use of her guardianship over **Clyde Bowman**, an elderly person born 11/08/1921, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$3,820.14**, belonging to Bowman and entrusted to Parks for a limited use, namely to manage for the benefit of Bowman, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.

25. Between 07/05/2013 and 07/03/2015, through the use of her guardianship over **Roy Franklin**, an elderly person born 06/27/1925, **April Parks** and **Mark Simmons** converted **\$5,806.97**, belonging to Franklin with the intention of permanently depriving Franklin of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
26. Between 07/05/2013 and 07/03/2015, through the use of her guardianship over **Roy Franklin**, an elderly person born 06/27/1925, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$5,806.97**, belonging to Franklin and entrusted to Parks for a limited use, namely to manage for the benefit of Franklin, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
27. Between 12/03/2013 and 11/04/2015, through the use of her guardianship over **Juanita Graham**, an elderly person born 06/09/1929, **April Parks** and **Mark Simmons** converted **\$5,766.75**, belonging to Graham with the intention of permanently depriving Graham of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
28. Between 12/03/2013 and 11/04/2015, through the use of her guardianship over **Juanita Graham**, an elderly person born 06/09/1929, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$5,766.75**, belonging to Graham and entrusted to Parks for a limited use, namely to manage for the benefit of Graham, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
29. Between 07/03/2014 and 05/04/2015, through the use of her guardianship over **Yoshiko Kindaichi**, an elderly person born 01/03/1935, **April Parks** and **Mark Simmons** converted **\$3,699.28**, belonging to Kindaichi with the intention of permanently depriving Kindaichi of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
30. Between 07/03/2014 and 05/04/2015, through the use of her guardianship over **Yoshiko Kindaichi**, an elderly person born 01/03/1935, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$3,699.28**, belonging to Kindaichi and entrusted to Parks for a limited use, namely to manage for the benefit of Kindaichi, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
31. Between 07/04/2013 and 06/05/2015, through the use of her guardianship over **Walter Wright**, an elderly person born 10/30/1934, **April Parks** and **Mark Simmons** converted **\$4,183.08**, belonging to Wright with the intention of permanently depriving Wright of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
32. Between 07/04/2013 and 06/05/2015, through the use of her guardianship over **Walter Wright**, an elderly person born 10/30/1934, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$4,183.08**, belonging to Wright and entrusted to Parks for a limited use, namely to manage for the benefit of Wright, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
33. Between 03/05/2014 and 06/04/2015, through the use of her guardianship over **Dolores Smith**, an elderly person born 11/30/1932, **April Parks** and **Mark Simmons** converted **\$6,166.30**, belonging to Smith with the intention of permanently depriving Smith of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
34. Between 03/05/2014 and 06/04/2015, through the use of her guardianship over **Dolores Smith**, an elderly person born 11/30/1932, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$6,166.30**, belonging to Smith and entrusted to Parks for a limited use, namely to manage for the benefit of Smith, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.

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35. Between 08/03/2012 and 12/17/2015, through the use of her guardianship over **Marlene Homer**, an elderly person born 06/06/1939, **April Parks** and **Mark Simmons** converted **\$3,632.70²⁴**, belonging to Homer with the intention of permanently depriving Homer of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
36. Between 08/03/2012 and 12/17/2015, through the use of her guardianship over **Marlene Homer**, an elderly person born 06/06/1939, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$3,632.70**, belonging to Homer and entrusted to Parks for a limited use, namely to manage for the benefit of Homer, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
37. Between 08/03/2012 and 03/04/2015, through the use of her guardianship over **Marie Long**, an elderly person born 08/17/1919, **April Parks** and **Mark Simmons** converted **\$3,952.95²⁵**, belonging to Long with the intention of permanently depriving Long of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
38. Between 08/03/2012 and 03/04/2015, through the use of her guardianship over **Marie Long**, an elderly person born 08/17/1919, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$3,952.95**, belonging to Long and entrusted to Parks for a limited use, namely to manage for the benefit of Long, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
39. Between 09/19/2013 and 07/03/2014, through the use of her guardianship over **Rudy North**, an elderly person born 07/29/1936, **April Parks** and **Mark Simmons** converted **\$1,449.30²⁶**, belonging to Rudy North with the intention of permanently depriving Rudy North of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
40. Between 09/19/2013 and 07/03/2014, through the use of her guardianship over **Rudy North**, an elderly person born 07/29/1936, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$1,449.30²⁷**, belonging to Rudy North and entrusted to Parks for a limited use, namely to manage for the benefit of Rudy North, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.
41. Between 10/04/2013 and 05/05/2014, through the use of her guardianship over **Rennie North**, an elderly person born 12/03/1938, **April Parks** and **Mark Simmons** converted **\$1,441.80²⁸**, belonging to Rennie North with the intention of permanently depriving Rennie North of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099(3) (b) a category B felony.
42. Between 10/04/2013 and 05/05/2014, through the use of her guardianship over **Rennie North**, an elderly person born 12/03/1938, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$1,441.80²⁹**, belonging to Rennie North and entrusted to Parks for a limited use, namely to manage for the benefit of Rennie North, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.
43. Between 09/03/2013 and 08/03/2015, through the use of her guardianship over **Harold Lockwood**, an elderly person born 10/07/1927, **April Parks** and **Mark Simmons** converted **\$4,528.00**, belonging to Lockwood with the

²⁴ This figure includes \$2,556.30 for double billed ward visits (reduced due to some dates counted as unnecessary services) + shopping, court and banking

²⁵ This figure includes \$2,406.60 for double billed ward visits (reduced due to some dates counted as unnecessary services) + shopping, court and banking

²⁶ Parks received less fees than she submitted to the court. This figure constitutes only those fees she was actually paid

²⁷ Parks received less fees than she submitted to the court. This figure constitutes only those fees she was actually paid

²⁸ Parks received less fees than she submitted to the court. This figure constitutes only those fees she was actually paid

²⁹ Parks received less fees than she submitted to the court. This figure constitutes only those fees she was actually paid

intention of permanently depriving Lockwood of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.

44. Between 09/03/2013 and 08/03/2015, through the use of her guardianship over **Harold Lockwood**, an elderly person born 10/07/1927, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$4,528.00**, belonging to Lockwood and entrusted to Parks for a limited use, namely to manage for the benefit of Lockwood, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
45. Between 05/24/2013 and 01/05/2015, through the use of her guardianship over **Norbert Wilkening**, an elderly person born 01/09/1932, **April Parks** and **Mark Simmons** converted **\$4,533.20**, belonging to Wilkening with the intention of permanently depriving Wilkening of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
46. Between 05/24/2013 and 01/05/2015, through the use of her guardianship over **Norbert Wilkening**, an elderly person born 01/09/1932, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$4,533.20**, belonging to Wilkening and entrusted to Parks for a limited use, namely to manage for the benefit of Wilkening, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category B felony.
47. Between 06/05/2013 and 11/04/2013, through the use of her guardianship over **Adolfo Gonzalez**, an elderly person born 03/09/1941, **April Parks** and **Mark Simmons** converted **\$1,413.60**, belonging to Gonzalez with the intention of permanently depriving Gonzalez of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
48. Between 06/05/2013 and 11/04/2013, through the use of her guardianship over **Adolfo Gonzalez**, an elderly person born 03/09/1941, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$1,413.60**, belonging to Gonzalez and entrusted to Parks for a limited use, namely to manage for the benefit of Gonzalez, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.
49. Between 08/06/2013 and 08/03/2015, through the use of her guardianship over **Linda Phillips**, a vulnerable person, **April Parks** and **Mark Simmons** converted **\$3,445.26**, belonging to Phillips with the intention of permanently depriving Phillips of the ownership, use, benefit or possession of said funds contrary to NRS 200.5099 (3) (b) a category B felony.
50. Between 08/06/2013 and 08/03/2015, through the use of her guardianship over **Linda Phillips**, a vulnerable person, **April Parks** and **Mark Simmons**, without lawful authority, knowingly converted **\$3,445.26**, belonging to Phillips and entrusted to Parks for a limited use, namely to manage for the benefit of Phillips, contrary to NRS 205.0832 (b) Actions which constitute Theft, a category C felony.

In addition to using this scheme to exploit her wards, PARKS also filed 65 Annual Accountings and Petitions for Fees with the District Court between 07/22/2013 and 05/03/2016, each of which contained false representations; namely that the service hours PARKS claimed to have spent on each ward for ward visits, shopping and court visits were dedicated entirely to each ward, when in fact, the time was actually split between multiple wards at the same time, with each ward receiving benefit of only a portion of the time taken for the activity. The court, unaware that PARKS was misrepresenting the actual time she dedicated to each ward approved her petitions believing that her claims for fees were true. Each of these filing constitutes a violation of **NRS 239.330 Offering false instrument for filing or record**.

In addition, 57 of these petitions were filed along with a notarized declaration made by PARKS that she attested to the validity of the content of each petition under penalty of perjury. The purpose of each of these petitions was to obtain court approval either to pay herself fees that PARKS claimed were due, or to obtain court approval of fees that PARKS had already paid to herself. Making false and misleading statements in the petitions and accompanying exhibits

CONTINUATION

Event #: 150819-2043

as to the amount of those fees and the time taken to provide each service is material to the issue in question with each petition. As such, PARKS violated NRS 199.145, a category D felony.

51. On 12/18/2014, in the guardianship case of **James Poya** G-11-036043-A, **April Parks** made a willful and false statement, in a declaration made under penalty of perjury, namely the filing of a ***First Annual Accounting and Report of Guardian***, in a matter material to the issue in question, namely that she was owed fees for services rendered that were not, in fact rendered to the extent and duration claimed. This declaration constitutes a violation of NRS 199.145, a category D felony.
52. That **Mark Simmons** suborned April Parks to commit Perjury, contrary to NRS 199.145, a category D felony, in the filing of a ***First Annual Accounting and Report of Guardian*** on 12/18/2014, in the guardianship case of **James Poya** G-11-036043-A, when Simmons instructed staff of A Private Professional Guardian, LLC to falsify records of the amount and value of services they provided to wards of Parks, knowing that Parks would knowingly use that information to make a willful and false statement in a declaration made under penalty of perjury.
53. On 12/18/2014, in the guardianship case of **James Poya** G-11-036043-A, **April Parks** knowingly offered a false instrument to be filed, registered or recorded in a public office, namely the Clark County District Court, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of this state, namely Nevada Revised Statutes (NRS) 159.105 and 159.177, contrary to NRS 239.330 a category C felony. Said false instrument consisted of a ***First Annual Accounting and Report of Guardian*** that contained false statements about the duration of services provided to Poya and the value of the fees owed for those services.
54. On 07/30/2015, in the guardianship case of **James Poya** G-11-036043-A, **April Parks** made a willful and false statement, in a declaration made under penalty of perjury, namely the filing of a ***Second Annual Accounting and Report of Guardian***, in a matter material to the issue in question, namely that she was owed fees for services rendered that were not, in fact rendered to the extent and duration claimed. This declaration constitutes a violation of NRS 199.145, a category D felony.
55. That **Mark Simmons** suborned April Parks to commit Perjury, contrary to NRS 199.145, a category D felony, in the filing of a ***Second Annual Accounting and Report of Guardian*** on 07/30/2015, in the guardianship case of **James Poya** G-11-036043-A, when Simmons instructed staff of A Private Professional Guardian, LLC to falsify records of the amount and value of services they provided to wards of Parks, knowing that Parks would knowingly use that information to make a willful and false statement in a declaration made under penalty of perjury.
56. On 07/30/2015, in the guardianship case of **James Poya** G-11-036043-A, **April Parks** knowingly offered a false instrument to be filed, registered or recorded in a public office, namely the Clark County District Court, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of this state, namely Nevada Revised Statutes (NRS) 159.105 and 159.177, contrary to NRS 239.330 a category C felony. Said false instrument consisted of a ***Second Annual Accounting and Report of Guardian*** that contained false statements about the duration of services provided to Poya and the value of the fees owed for those services.
57. On 03/25/2016, in the guardianship case of **James Poya** G-11-036043-A, **April Parks** made a willful and false statement, in a declaration made under penalty of perjury, namely the filing of a ***Petition to Terminate Guardianship and Approve Final Accounting***, in a matter material to the issue in question, namely that she was owed fees for services rendered that were not, in fact rendered to the extent and duration claimed. This declaration constitutes a violation of NRS 199.145, a category D felony.
58. That **Mark Simmons** suborned April Parks to commit Perjury, contrary to NRS 199.145, a category D felony, in the filing of a ***Petition to Terminate Guardianship and Approve Final Accounting*** on 03/25/2016, in the guardianship case of **James Poya** G-11-036043-A, when Simmons instructed staff of A Private Professional Guardian, LLC to falsify records of the amount and value of services they provided to wards of Parks, knowing that Parks would knowingly use that information to make a willful and false statement in a declaration made under penalty of perjury.

Guardian, LLC to falsify records of the amount and value of services they provided to wards of Parks, knowing that Parks would knowingly use that information to make a willful and false statement in a declaration made under penalty of perjury.

59. On 03/25/2016, in the guardianship case of **James Poya** G-11-036043-A, **April Parks** knowingly offered a false instrument to be filed, registered or recorded in a public office, namely the Clark County District Court, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of this state, namely Nevada Revised Statutes (NRS) 159.105 and 159.177, contrary to NRS 239.330 a category C felony. Said false instrument consisted of a ***Petition to Terminate Guardianship and Approve Final Accounting*** that contained false statements about the duration of services provided to Poya and the value of the fees owed for those services.
60. On 06/18/2014, in the guardianship case of **Ruth Braslow** G-13-038228-A, **April Parks** made a willful and false statement, in a declaration made under penalty of perjury, namely the filing of a ***First Annual Accounting and Report of Guardian***, in a matter material to the issue in question, namely that she was owed fees for services rendered that were not, in fact rendered to the extent and duration claimed. This declaration constitutes a violation of NRS 199.145, a category D felony.
61. That **Mark Simmons** suborned April Parks to commit Perjury, contrary to NRS 199.145, a category D felony, in the filing of a ***First Annual Accounting and Report of Guardian*** on 06/18/2014, in the guardianship case of **Ruth Braslow** G-13-038228-A, when Simmons instructed staff of A Private Professional Guardian, LLC to falsify records of the amount and value of services they provided to wards of Parks, knowing that Parks would knowingly use that information to make a willful and false statement in a declaration made under penalty of perjury.
62. On 06/18/2014, in the guardianship case of **Ruth Braslow** G-13-038228-A, **April Parks** knowingly offered a false instrument to be filed, registered or recorded in a public office, namely the Clark County District Court, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of this state, namely Nevada Revised Statutes (NRS) 159.105 and 159.177, contrary to NRS 239.330 a category C felony. Said false instrument consisted of a ***First Annual Accounting and Report of Guardian*** that contained false statements about the duration of services provided to Braslow and the value of the fees owed for those services.
63. On 05/04/2015, in the guardianship case of **Ruth Braslow** G-13-038228-A, **April Parks** made a willful and false statement, in a declaration made under penalty of perjury, namely the filing of a ***Second Annual Accounting and Report of Guardian***, in a matter material to the issue in question, namely that she was owed fees for services rendered that were not, in fact rendered to the extent and duration claimed. This declaration constitutes a violation of NRS 199.145, a category D felony.
64. That **Mark Simmons** suborned April Parks to commit Perjury, contrary to NRS 199.145, a category D felony, in the filing of a ***Second Annual Accounting and Report of Guardian*** on 05/04/2015, in the guardianship case of **Ruth Braslow** G-13-038228-A, when Simmons instructed staff of A Private Professional Guardian, LLC to falsify records of the amount and value of services they provided to wards of Parks, knowing that Parks would knowingly use that information to make a willful and false statement in a declaration made under penalty of perjury.
65. On 05/04/2015, in the guardianship case of **Ruth Braslow** G-13-038228-A, **April Parks** knowingly offered a false instrument to be filed, registered or recorded in a public office, namely the Clark County District Court, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of this state, namely Nevada Revised Statutes (NRS) 159.105 and 159.177, contrary to NRS 239.330 a category C felony. Said false instrument consisted of a ***Second Annual Accounting and Report of Guardian*** that contained false statements about the duration of services provided to Braslow and the value of the fees owed for those services.

Spencer Luxury Care

Ward Visits

Name	Billed Person Time	Billed Person Cost	Actual Person Time	Actual Person Cost	Fraud Loss per person
Clyde Bowman	35.5	\$4,260.00	6.773	\$812.76	\$3,447.24
Roy Franklin	38	\$4,560.00	7.183	\$861.96	\$3,698.04
Juanita Graham	35.58	\$4,269.60	7.156	\$858.72	\$3,410.88
Yoshiko Kindaichi	18	\$2,160.00	3.381	\$405.72	\$1,754.28
Martha Ornelas	32.25	\$3,870.00	5.986	\$718.32	\$3,151.68
Walter Wright	37.58	\$4,509.60	7.086	\$850.32	\$3,659.28
Robert Smith	6	\$720.00	0.978	\$117.36	\$602.64
Linda Fisher	5	\$600.00	1.01	\$121.20	\$478.80
Edward Atherton	8.58	\$1,029.60	2.03	\$243.60	\$786.00
Charles Maddera	8.75	\$1,050.00	2.11	\$253.20	\$796.80
Rex Lyons	6.83	\$819.60	1.8	\$216.00	\$603.60
Dolores Smith	2.75	\$330.00	0.55	\$66.00	\$264.00
Larry Coble	15.25	\$1,830.00	2.951	\$354.12	\$1,475.88
Total daily time	250.07	\$30,008.40	48.994	\$5,879.28	\$24,129.12
Billed daily cost	\$30,008.40				
Actual time	51.33				
Actual cost	\$6,159.60				
Total Fraud Loss	\$23,848.80				
Time/ward					

Joyful Senior Care

Ward Visits

Name	Actual Person Cost	Fraud Loss per person
James Poya	\$1,715.70	\$4,374.30
Ruth Braslow	\$1,805.70	\$4,854.30
Carolyn Rickenbaugh	\$589.50	\$1,580.10
Delmond Foster	\$873.00	\$2,487.00
William Brady	\$1,805.70	\$5,214.30
Total daily time	\$6,789.60	\$18,510.00
Billed daily cost		
Actual time		
Actual cost		
Total Fraud Loss		
Time/ward		

SUPP 0500

Spencer Luxury Care

Ward Visits

Name	Billed Person Time	Billed Person Cost	Actual Person Time	Actual Person Cost	Fraud Loss per person
Clyde Bowman	35.5	\$4,260.00	6.773	\$812.76	\$3,447.24
Roy Franklin	38	\$4,560.00	7.183	\$861.96	\$3,698.04
Juanita Graham	35.58	\$4,269.60	7.156	\$858.72	\$3,410.88
Yoshiko Kindaichi	18	\$2,160.00	3.381	\$405.72	\$1,754.28
Martha Ornelas	32.25	\$3,870.00	5.986	\$718.32	\$3,151.68
Walter Wright	37.58	\$4,509.60	7.086	\$850.32	\$3,659.28
Robert Smith	6	\$720.00	0.978	\$117.36	\$602.64
Linda Fisher	5	\$600.00	1.01	\$121.20	\$478.80
Edward Atherton	8.58	\$1,029.60	2.03	\$243.60	\$786.00
Charles Maddera	8.75	\$1,050.00	2.11	\$253.20	\$796.80
Rex Lyons	6.83	\$819.60	1.8	\$216.00	\$603.60
Dolores Smith	2.75	\$330.00	0.55	\$66.00	\$264.00
Larry Coble	15.25	\$1,830.00	2.951	\$354.12	\$1,475.88
Total daily time	250.07	\$30,008.40	48.994	\$5,879.28	\$24,129.12
Billed daily cost	\$30,008.40				
Actual time	51.33				
Actual cost	\$6,159.60				
Total Fraud Loss	\$23,848.80				
Time/ward					

Lakeview Terrace

Ward Visits

Name	Fraud Loss per person
Marlene Homer	\$4,822.80
Marie Long	\$4,727.10
Rudy North	\$1,477.80
Rennie North	\$1,286.40
Frank Papapietro	\$1,092.30
Harold Lockwood	\$3,568.50
Norbert Wilkening	\$3,289.20
Adolfo Gonzalez	\$1,353.60
Delores Smith	\$2,854.50
Linda Phillips	\$1,833.60
Barbara Neely	\$597.00
Total daily time	\$24,472.20
Billed daily cost	
Actual time	
Actual cost	
Total Fraud Loss	
Time/ward	

SUPP 0502

Joyful Senior Care Haven II

Ward Visits

Name	Billed Person Time	Billed Person Cost	Actual Person Time	Actual Person Cost	Fraud Loss per person
Cecilia Cass	28.42	\$3,410.40	5.464	\$655.68	\$2,754.72
Kenneth Edwards	13.75	\$1,650.00	2.844	\$341.28	\$1,308.72
Janice Mitchell	44.67	\$5,360.40	11.2215	\$1,346.58	\$4,013.82
Gloria Schneringer	34	\$4,080.00	10.4125	\$1,249.50	\$2,830.50
Marilyn Scholl	37.67	\$4,520.40	6.114	\$733.68	\$3,786.72
Patricia Smoak	54.75	\$6,570.00	15.034	\$1,804.08	\$4,765.92
Mary Vitek	15.25	\$1,830.00	3.0825	\$369.90	\$1,460.10
Roy Cass	4.25	\$510.00	0.59	\$70.80	\$439.20
Total daily time	232.76	\$27,931.20	54.7625	\$6,571.50	\$21,359.70
Billed daily cost	\$27,931.20				
Actual time	55.92				
Actual cost	\$6,710.40				
Total Fraud Loss	\$21,220.80				
Time/ward					

SUPP 0503

Spencer Luxury Care

Ward Visits

Name	Billed Person Time	Billed Person Cost	Actual Person Time	Actual Person Cost	Fraud Loss per person
Clyde Bowman	35.5	\$4,260.00	6.773	\$812.76	\$3,447.24
Roy Franklin	38	\$4,560.00	7.183	\$861.96	\$3,698.04
Juanita Graham	35.58	\$4,269.60	7.156	\$858.72	\$3,410.88
Yoshiko Kindaichi	18	\$2,160.00	3.381	\$405.72	\$1,754.28
Martha Ornelas	32.25	\$3,870.00	5.986	\$718.32	\$3,151.68
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Linda Fisher	5	\$600.00	1.01	\$121.20	\$478.80
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Charles Maddera	8.75	\$1,050.00	2.11	\$253.20	\$796.80
Rex Lyons	6.83	\$819.60	1.8	\$216.00	\$603.60
Dolores Smith	2.75	\$330.00	0.55	\$66.00	\$264.00
Larry Coble	15.25	\$1,830.00	2.951	\$354.12	\$1,475.88
Total daily time	250.07	\$30,008.40	48.994	\$5,879.28	\$24,129.12
Billed daily cost	\$30,008.40				
Actual time	51.33				
Actual cost	\$6,159.60				
Total Fraud Loss	\$23,848.80				
Time/ward					

OFFICER'S REPORT

Event #: 150819-2043Theft & Filing False Document – Audrey Weber Guardianship

SUBJECT

DIVISION
REPORTING:HSDDIVISION OF
OCCURRENCE:HSDDATE & TIME
OCCURRED:02/07/2012LOCATION OF
OCCURRENCE:Within Jurisdiction of Clark County, NVVICTIM:

DOB

Audrey Joan WEBER

[REDACTED]

62

Home Address

Harmon Medical & Rehabilitation Hospital
2710 E. Harmon Ave
Las Vegas, NV 89119SYNOPSIS:

On February 7, 2012, April Parks (PARKS) filed or caused to be filed with the Clark County District Court a *Petition for Appointment of Guardian*. The subject of this petition was Audrey Weber (WEBER), an elderly female born [REDACTED] 1926. On March 7, 2012, PARKS was appointed as the guardian of WEBER.

PARKS and her employee Mark Simmons (SIMMONS) violated NRS 239.330 Offering false instrument for filing or record, a category C felony, in that on June 18, 2013, PARKS filed a *Petition to Terminate Guardianship and Approve Final Accounting* with the District Court that contained false statements made by SIMMONS and that PARKS knew to be false, including:

- PARKS and SIMMONS claimed to have performed over 62 hours of guardianship services for WEBER;
- PARKS and SIMMONS claimed to have earned fees in the amount of \$7,543.80 performing the function as guardian of WEBER

PARKS also violated NRS 205.0832 (b) Actions which constitute Theft, a category B felony, in that she converted property belonging to the estate of Audrey WEBER, namely \$3,619.60, with the intent to deprive the estate of Audrey WEBER of said property.

Seized from PARKS storage facility during the service of search warrants as part of this investigation was a file folder containing documents pertaining to WEBER. These documents included:

- Two Invoices documenting the activities performed by PARKS and her staff for WEBER between March 1, 2012, and April 28, 2012. These Invoices showed that PARKS' staff worked 16.34 for which PARKS charged

Date and Time of Report: 10/12/2016 08.00Officer: Jaclyn O'MalleyP#: 089

Approved By: _____

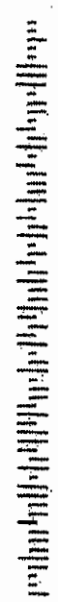
Officer: Colin HaynesP#: 6160

SIGNATURE: _____

April Parks #1210454
F.M. W.C.C.
4330 Smiley Rd.
L.V. Mo. 89115

Anthony Goldstein, Esq.
2421 Tech Center Ct #100
Las Vegas, Mo 89128

123 LINDEN 89128



Hester
50242016
REGISTERED \$000.45
ZIP 89101
CITY 280751

1-21-17

Dear Anthony,

I arrived at Smiley on the 15th and would like for you to get the paperwork started for a sentence modification.

I think you said something about a change of attorneys, I can't remember exactly, I was was still in shock.

In any case, could you please get that going.

Thank you for all of your help and I look forward to hearing from you.

Sincerely,
April Parker

Law Offices of Anthony M. Goldstein

Ms. April Parks (NDOC #121045)
Florence McClure Women's Correctional Center
4370 Smiley Road
Las Vegas, Nevada 89115-1808

Sent Via First Class Mail

Dear April:

I received your letter, which was postmarked on January 24th, 2019. In the letter, you asked about filing a motion to modify the sentence that Judge Jones imposed. In this letter, I'd like to clarify what we talked about when I visited you after the sentencing hearing.

During that visit, I told you that in my opinion, the only potentially legitimate option so far as trying to obtain relief from your sentence is via a Petition for Writ of Habeas Corpus (Post-Conviction). I enclosed a copy of NRS 34.720-730 for your reference. These sections address the timelines and procedures for filing this type of petition.

So far as counsel for the petition, you would have to file a motion with the Court to request post-conviction counsel. In that petition, you would assert any matters whatsoever, including any issues at the actual sentencing hearing and also any gripes that you may have about my representation of you throughout the case. From day 1 and up to and including when I visited you after sentencing, you expressed your satisfaction with my efforts. However, as I told you during said visit, though I believe that I did effective work as your attorney, defendants commonly typically include a claim of ineffective assistance of counsel against their attorney.

Please review the enclosed statutes and then feel free to write with any additional questions.

Very truly yours,

Anthony M. Goldstein

Anthony M. Goldstein, Esq.



June 8, 2018
Via Electronic Mail

Office of Appointed Counsel, Clark County
c/o Anthony M. Goldstein, Esq.

Re: State v. Parks

Dear Mr. Goldstein:

This letter confirms that Clark County's Office of Appointed Counsel ("OAC") has engaged Anthem Forensics LLC ("Anthem") to provide consulting and expert witness services relative to the captioned matter. This correspondence constitutes a description of the engagement arrangement between OAC and Anthem. If OAC agrees to the arrangement as set forth below, please sign this letter in the space provided and return a signed copy to Anthem.

8/02
ANTHONY
GOLDSTEIN
Anthem's ability to perform its analyses is dependent upon access to all financial and accounting related data. OAC may request that the results of the engagement be documented in a written report. If such a report is issued, Anthem will update the report for events or circumstances that occur subsequent to its issuance only if specifically requested to do so and will be compensated in the same manner as set forth in this engagement letter. If, for any reason, Anthem is unable to complete its analyses, OAC and Anthem will jointly determine the need for any type of report on the results of the engagement. → H/O R ANTHONY GOLDSTEIN

↑
Anthem will communicate to OAC, as soon as reasonably possible, any conflicts of interest that it may become aware of and any significant reservations concerning the scope or benefits of the engagement. Anthem has performed an internal search for potential client conflicts and has not become aware of any such conflicts.

7 & ANTHONY GOLDSTEIN
OAC acknowledges that at this time Anthem may not have received sufficient information to be considered conflicted by any party in the captioned matter. In such a situation, should Anthem be approached by a different party to this matter ("other party") regarding potential retention in the captioned matter, Anthem may consider being retained by that other party if all of the following are true: 1) the retaining party referenced herein has not yet executed this engagement letter and returned it to Anthem, 2) the party responsible for paying Anthem's fees as articulated in this engagement letter has not yet provided the initial retainer, and 3) Anthem has not yet been provided with information that might conflict it from retention by the other party. If Anthem deems all three of these criteria to be true, and if Anthem decides to move ahead with retention by the other party, Anthem will take reasonable measures to inform the parties to this engagement letter that the proposal contained herein is being rescinded. It bears noting that this provision of the engagement letter is intended to prevent Anthem from being intentionally or unintentionally precluded from matters in which it might otherwise be involved.

Any information, work papers, or conclusions developed, as well as any communications or documents, will not be divulged to other persons without your prior approval. Please note that it is not Anthem's practice to retain superseded work papers or data files that have been updated. If OAC wishes us to maintain either of these types of superseded data, please indicate such specific request(s) in writing when returning a copy of this engagement letter.

s/or ANTHONY GOLDSTEIN
During the course of this engagement, various parties may provide Anthem with data or documents in both electronic and hardcopy format (collectively, "documents"). Unless alternative arrangements are made timely in writing, OAC agrees that Anthem will make those documents available for appropriate retrieval up to six months after Anthem's last billed time entry in this matter. OAC also permits Anthem to convert unretrieved documents into an electronic medium (and destroy any hardcopy from which such electronic medium was converted) upon the passage of six months after Anthem's last billed time entry in this matter. Unless alternative arrangements are made timely in writing, OAC agrees that Anthem may destroy all unretrieved documents no less than seven years after Anthem's last billed time entry in this matter. The parties to this letter acknowledge that documents provided to Anthem pursuant to the terms of this paragraph will not impair Anthem's independence in this engagement.

APPROVAL
Anthem understands that OAC will be responsible for all costs associated with Anthem's analyses, including the payment of the initial ~~retainer~~ fee discussed below. As such, a representative's signature on this document indicates OAC's acceptance of this obligation.

APPROVAL
Anthem requires a ~~retainer~~ of \$5,000 relative to this engagement. ~~The \$5,000 retainer will be held by Anthem and applied to ongoing invoices associated with this engagement. If the retainer balance decreases, or is expected to decrease, to zero at any time during the engagement, Anthem may request that additional retainer funds be immediately submitted by OAC.~~ *APPROVED ANTHONY GOLDSTEIN*

APPROVE

Please note that the ~~retainer balance~~ will be estimated periodically and will take into consideration both billed and unbilled fees. ~~If the retainer balance exceeds the final billing in this matter, Anthem will refund the difference. The retainer is not an estimate of the total cost of the engagement. The retainer will not earn interest while held by Anthem.~~

Anthem's fees for this work will be at its regular hourly rates for the individuals involved, plus out-of-pocket expenses. Should this engagement continue beyond six (6) months or the end of the calendar year, there may be an increase in rates as a result of Anthem's review of its hourly rates. Currently, Anthem's regular hourly rates are categorized as follows:

Joseph L. Leauanae	\$330
Jennifer A. Allen	\$220
Professional Staff	\$65 – \$130

APPROVE
Both OAC and Anthem acknowledge that the payment of Anthem's fees will not be contingent upon the results of Anthem's analyses. Fees for services will be applied to the retainer balance as work progresses and expenses are incurred. As indicated earlier, Anthem understands that OAC will be responsible for all costs associated with Anthem's analyses.

APPROVE
If the ~~retainer balance~~ decreases to zero, and we cannot reasonably reach an agreement as to the replenishment of the ~~retainer balance~~, Anthem, at its sole discretion, may either stop all work until the ~~retainer balance~~ is replenished and any outstanding invoices have been brought current, or withdraw from this engagement. OAC acknowledges and agrees that Anthem is not required to continue working in the event of OAC's failure to pay on a reasonably timely basis for services rendered as required by this agreement. OAC further acknowledges and agrees that in the event Anthem stops working or withdraws from this engagement as a result of OAC's failure to pay on a reasonably timely basis, Anthem shall not be liable to any party for any damages that may occur as a result of Anthem's cessation of services.

APPROVE
In recognition of the relative risks and benefits of this agreement to both OAC and Anthem, we have discussed and agreed upon the fair allocation of risk between us. As such, OAC agrees, to the fullest extent permitted by law, to limit Anthem's liability to OAC for any and all claims, losses, costs, and damages of any nature whatsoever, such that Anthem's total aggregate liability shall not exceed Anthem's total fees for services rendered under this agreement. OAC intends and agrees that this limitation apply to any and all liability or cause of action against Anthem, however alleged or arising, unless otherwise prohibited by law.

It is understood between the parties to this agreement that Anthem may terminate this engagement for good cause. By countersigning this letter at the spaces indicated below, OAC agrees to be bound by the terms of this letter.

We appreciate this opportunity to be of service. If OAC agrees with the foregoing terms, please sign this letter where indicated and return it to Anthem.

Sincerely,



Joseph L. Leauanae, CPA, CITP, CFF, CFE, ABV, ASA
Anthem Forensics LLC

Accepted:

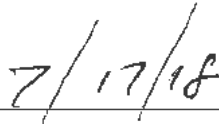
This letter correctly sets forth the understanding of Clark County's Office of Appointed Counsel.



Signature - Clark County's Office of Appointed Counsel



Printed Name



Date

EXPERT WITNESS REQUEST

Office of Appointed Counsel

Attorney Anthony M. Goldstein, Esq. Date June 27, 2018

Phone No. (702) 796-1114 Fax No./E-Mail 796-1115 / amg@amglegal.com

Defendant Name April Parks

Case Number C-17-321808-1 and C-18-329886-2 Charges _____

Dept Number 10

Expert Name Joe Leauanae / Anthem Forensics Tax ID No. _____

Field of Expertise Forensic Accounting/Monetary Forensics

Hourly Rate \$ See attached Hours Requested See Attached Total \$ See Attached

Please include a synopsis of the charges, a rendition of the facts, and the theory of the case vis a vis the requested expert. Also please attach a copy of the expert's curriculum vitae.

- Herein, the State charges Defendant in two separate cases with over 200 felonies relating to alleged fraudulent conduct while operating a business as a private guardian.
- The State provided me with approximately 15,000 pages of discovery and there are dozens of named victims.
- In order to properly defend the case, I need to analyze and possibly reconstruct the financial records from defendant's business. Due to the sheer number of charges, the complexity of the charges and the massive amount of discovery, I would like the assistance of a forensic accountant.

OAC APPROVAL

To be completed by OAC

OAC has reviewed this request and has: ☒ approved a total amount of \$ 5000.00 which includes all expenses incurred during the representation; ☐ not approved this request for expert.

Reviewed by [Signature]Date 7/27/18

<u>CONVICTED FRAUD DEFENDANTS</u>	<u>STATE CONVICTED</u>	<u>SENTENCE</u>	<u>AMOUNT STOLEN</u>	<u>TYPE OF FRAUD</u>	<u>NOTES</u>
April Parks	Nevada	192 to 480 months	\$554,397.71	Guardianship fraud	Guardianship fraud.
Helen Natko	Nevada	60 months probation	\$200,000.00	Guardianship fraud	Found guilty of exploitation of an elderly person. She was appointed guardian over the person. She got 5 years probation and a 10,000 fine.
Sherilyn N. Jones	Michigan	40 to 240 months	\$300,000.00	Guardianship fraud	Former public guardian with 50 clients that lost 300k.
Sharon Moore	New Mexico	240 months	\$11 million	Guardianship fraud	Guardianship fraud scheme with two co-defendants.
Sheila Jones	Nevada	24 to 60 months	\$549,172.67	Real Estate fraud	1 victim, real estate theft/fraud
Robert Seabrook	Nevada	28 to 72 months	\$548,739.02	Business fraud	Accused of theft from Gilmore Construction, LLC.
Ariell Dix of Chandler, Arizona and Nneka Gibney of Sparks, Nevada	Nevada	36 months and 24 months	\$362,000.00	Medicaid fraud	Medicaid fraud through Lifetime Assistance LLC, a behavioral health outpatient treatment company co-owned by Dix and Gibney. The two women were sentenced for Medicaid fraud involving inadequate records and then were ordered to pay restitution to Nevada Medicaid.
Derrick and Cynthia Phelps	Nevada	70 months and 48 months	\$31 million	Mortgage fraud scheme	Mortgage fraud scheme that caused over \$30 million in losses to federally insured financial institutions. They pleaded guilty to one count of conspiracy to commit bank fraud, mail fraud and wire fraud and seven counts of bank fraud.
Trixa Belloso	Nevada	14 months	\$2 million	Tax fraud	Former tax preparer also must pay \$2 million restitution to the IRS. She owned and operated a tax preparation business that filed 500 false tax returns.

Gregory Olson	Nevada	48 months	\$1.5 million	Wire fraud/tax fraud	Former church treasurer sentenced for wire fraud and tax fraud.
Lawrence R. Valentine	Nevada	42 to 120 months	\$103,000.00	Investor fraud	Took victim's money and promised to invest the funds. He put the money in his own bank account. He was ordered to pay \$103,000.00 in restitution.
Javier Montano	Nevada	120 months	\$1.2 million	SSA/VA fraud	Former bank manager stole from government programs SSA and VA. Pleaded guilty and will be sentenced in December 2020.
Josiah Ntekume	Nevada	65 months	\$200,000.00	Tax fraud	Filed fake tax returns for nearly 200 people. Was also sentenced to pay restitution of \$221,599.00.
Erik Badgett	Nevada	24 to 80 months	\$72,563.00	Medicaid fraud	Was also ordered to pay \$84,583.00 in restitution.
Ann Armstrong	Nevada	57 months	\$600,000.00	Student loan fraud	Took out fraudulent student loans for family members. Ordered to pay restitution of \$662,081.00.
Joseph Bricker	Nevada	60 months probation	\$75,000.00	Workers comp fraud	Filed false workers comp claim. Ordered to pay \$75,000 in restitution to workers comp insurance carrier.
Kenneth Gibson	Nevada	48 months	\$3.5 million	Consumer fraud/identity theft	Created 8000 false Paypal accounts. Ordered to pay \$1 million in restitution.
Elias Herbert "Bert" Hafen	Connecticut	30 months	\$1.6 million	Investor fraud	Financial advisor at Morgan Stanley. Had 11 clients transfer money into his bank account and spent the money he was supposed to invest. Created false investment statements. The firm paid victims back for their losses.
David Oancea	Nevada	60 months probation	\$3.5 million	Identity theft	Identity theft. Ordered to pay \$550,000 in restitution.
Gareth Long	Nevada	70 months	\$11 million	Identity theft	Ordered to pay \$11.2 million in restitution.

APRIL PARKS

Kelvin Atkinson	Nevada	27 months	\$195,000.00	Embezzled campaign contributions	Embezzled \$195,000 in campaign contributions. He was fined \$250,000.
Michael White	Nevada	14 months	\$1 million	Insurance fraud	He was ordered to pay back \$100,000.
Darin French	Nevada	150 months	\$1.5 million	Consumer fraud	Ordered to pay \$1.5 million in restitution.
Tony Ahn	Nevada	57 months	\$863,895.00	Consumer fraud	Stole free play points from thousands of casino customers. Ordered to pay \$863,895.00 in restitution.
Frederick Williams	Nevada	87 months	\$300,000.00	Fraud	Ordered to pay \$297,000.00 in restitution.
Doretha Scott	Nevada	12 to 36 months	\$160,561.43	Medicaid fraud	Ordered to pay \$160,561.43 in restitution.
Karen Chapon	Nevada	24 to 72 months	\$200,000.00	Insurance and mortgage fraud	Ordered to pay \$13,000.00 in restitution.
Nelson M. Mukuna	Nevada	14 months	\$175,000.00	Health care fraud	Ordered to pay \$3.7 million in restitution.
William Waller	Nevada	78 months	\$1,459,535.70	Tax fraud	CPA lost his license and was ordered to pay \$1,459,535.70 in restitution.
Lorraine Riddiough	Nevada	36 months	\$4 million	Health care fraud	Health care fraud scheme targeting the elderly. Ordered to pay \$4 million in restitution.

Descriptive Statistics

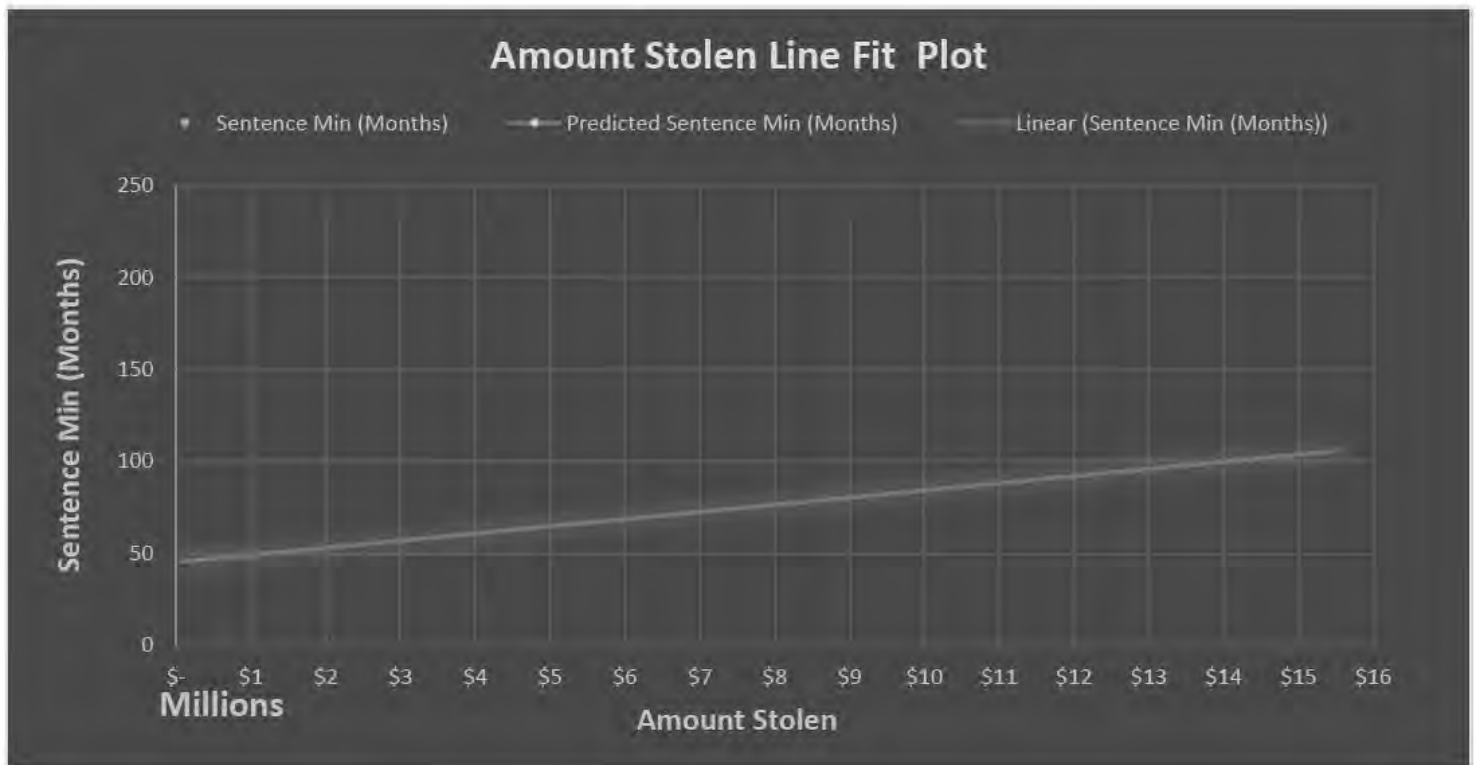
Given the sample of 31 sentenced cases in Nevada, Michigan, New Mexico, and Connecticut for fraud, the average amount stolen is \$2,553,692.48 with median of \$600,000.00 and standard deviation of \$4,391,882.71. The minimum amount stolen is \$72,563.00 and maximum of \$15,500,000.00 with the total of \$79,164,466.82. The average minimum sentencing is 55.06 months and maximum average sentence of 70.74 months.

Regression

Regression analysis was performed to determine the amount stolen against minimum months sentenced indicated statistically significant p-value of 0.0396. The regression formula is as follows:

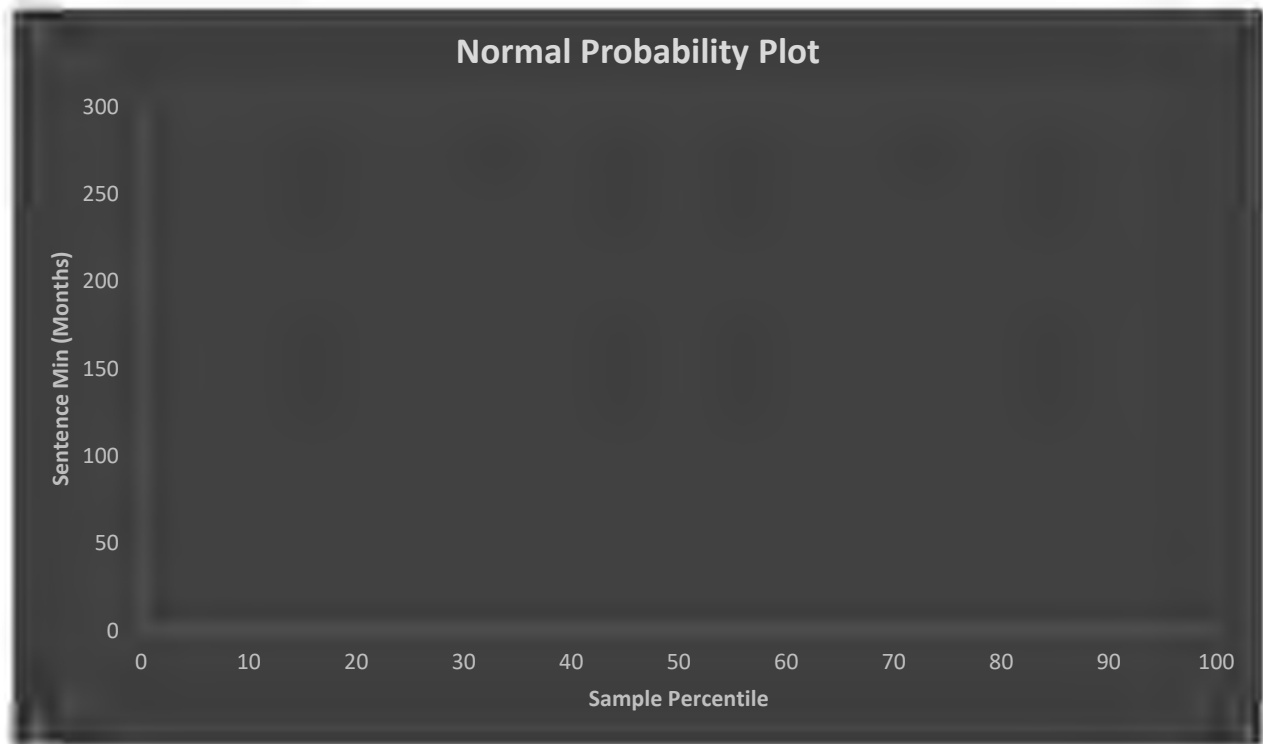
$$\text{Minimum Sentence (Months)} = 45.1012 + 0.0000039 \text{ Amount Stolen}$$

For every \$1,000,000 stolen, the sentencing increases by 3.9 months.



Analysis

Given the regression analysis for sample provided is statistically significant with p-value below 0.05, it is predicted that the minimum sentence for \$554,397.71 stolen is 48 months. Results show the average for minimum sentence is 56 months and 47 months standard deviation. In any distribution, about 95% of values are within 2 standard deviations of the mean, which in this case is 150 months. See Normal Probability Plot.



Output

<i>Sentence Min (Months)</i>	
Mean	55.06452
Standard Error	8.282503
Median	48
Mode	24
Standard Deviation	46.11503
Sample Variance	2126.596
Kurtosis	8.270588
Skewness	2.551144
Range	228
Minimum	12
Maximum	240
Sum	1707
Count	31
Confidence Level(95.0%)	16.91513

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SUMMARY
OUTPUT

<i>Regression Statistics</i>	
Multiple R	0.371570777
R Square	0.138064842
Adjusted R Square	0.10834294
Standard Error	43.54531052
Observations	31

ANOVA

	<i>df</i>	<i>SS</i>	<i>MS</i>	<i>F</i>
Regression	1	8808.242992	8808.242992	4.645222311
Residual	29	54989.62798	1896.194068	
Total	30	63797.87097		

	<i>Coefficients</i>	<i>Standard Error</i>	<i>t Stat</i>	<i>P-value</i>
Intercept	45.10124658	9.084998244	4.96436492	2.80075E-05
Amount Stolen	3.90E-06	1.81021E-06	2.155277781	0.039576138



1 **ANS**
2 AARON D. FORD
3 Attorney General
4 MICHAEL J. BONGARD (Bar No. 007997)
5 Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 1539 Avenue F, Suite 2
9 Ely, NV 89301
10 (775)289-1632 (phone)
11 (775)289-1653 (fax)
12 MBongard@ag.nv.gov
13 Attorneys for Respondents

8 **DISTRICT COURT**
9 **CLARK COUNTY NEVADA**

10 APRIL PARKS,)	Case No.: A-19-807564-W
)	Department X
11 Petitioner,)	
)	
12 vs.)	(Criminal Case No. C-17-321808-1)
)	
13 DWIGHT NEVEN, WARDEN, AND, THE)	
14 STATE OF NEVADA,)	
)	
15 Respondents.)	

16 **ANSWER TO POST-CONVICTION PETITION FOR WRIT OF**
17 **HABEAS CORPUS**

18 Respondents, by and through counsel, Aaron D. Ford, Attorney General of The State of Nevada,
19 and Michael J. Bongard, Senior Deputy Attorney General, hereby submit their answer to Petitioner
20 April Parks' (Parks) Petition for Writ of Habeas Corpus (Post-conviction). Respondents base this
21 answer upon the pleadings, the legal authorities, and the pleadings on file in this case and the criminal
22 case.

23 **PROCEDUAL HISTORY**

24 **I. Trial Court Proceedings, Eighth Judicial District Court**

25 In March of 2017, a Clark County grand jury returned an indictment against Parks for 270
26 counts including racketeering, theft (Category 'B' and 'C' felonies), offering false instrument for filing
27 or record, and perjury. Exhibit #1.¹

28 ¹ Exhibits 1 and 2 are attached to this answer.

1 Pursuant to a guilty plea agreement filed in November of 2018, Parks entered an *Alford*² plea to
2 2 counts of exploitation of an older/vulnerable person, 2 counts of theft, and 1 count of perjury in this
3 case, with the sentence to run concurrent to the sentence in C329886. App 1.³ Parks rejected a
4 stipulated sentence of 8-20 years, leaving the parties free to argue for any lawful sentence. *Id.* at 2.

5 The parties submitted sentencing memorandums prior to the January 4 sentencing hearing. *Id.* at
6 33 and 55. The Court imposed an aggregated sentence of 16-40 years in this case and a concurrent 6 to
7 15-year sentence in C329886. *Id.* at 82. The Court ordered restitution of \$559,205.32, reduced to
8 \$554,397.71 in the amended judgment of conviction filed on February 4, 2019. Exhibit #2.

9 **II. Appellate Proceedings**

10 Parks did not file a notice of appeal. However, in Ground Three of the supplemental petition,
11 Parks alleges that trial counsel failed to file a notice of appeal.

12 **III. State Habeas Corpus Proceedings, Eighth Judicial District Court**

13 Through counsel, Parks filed her original state habeas corpus petition on December 27, 2019.

14 On September 30, 2020, Parks filed her supplemental state habeas corpus petition (SPWHC). In
15 that pleading, Parks raises the following claims (all claims previously raised in the original petition):

- 16 • Ground One: Trial counsel advised Parks to reject a more favorable plea deal and Parks
17 subsequently received a much harsher sentence;
- 18 • Ground Two: Parks' trial counsel was ineffective when trial counsel failed to challenge
19 errors during sentencing and/or was otherwise ineffective in conjunction with the
20 sentence proceeding;
- 21 • Ground Three: Parks was deprived of her right to a direct appeal.

22 SPWHC.

23 The matter is currently set for a hearing before the Court on February 8, 2021. Based upon the
24 arguments and law presented in this answer, Parks' claims are either meritless or procedurally
25 defaulted.

26 ///

27 ² *North Carolina v. Alford*, 400 U.S. 25 (1970).

28 ³ Exhibits in Petitioner's appendix are referenced by their Bates stamp page at the bottom right.
(APP___).

1 **ARGUMENT AND LAW**

2 **I. Applicable Law**

3 Nevada law governs state habeas corpus proceedings. *McConnell v. State*, 212 P.3d 307, 309
4 (Nev. 2009).

5 By statute, habeas corpus proceedings permit a person to challenge that his conviction or
6 sentence violate the Constitution of the United States or the Constitution or laws of Nevada. NRS
7 34.724(1). To the extent they do not conflict with habeas corpus statutes, the Nevada Rules of Civil
8 Procedure apply to habeas corpus proceedings. NRS 34.780. Appointment of counsel in habeas corpus
9 proceedings lies with the discretion of the court. NRS 34.750. A court determines the propriety and
10 necessity of discovery or an evidentiary hearing. NRS 34.770.

11 A court may dismiss a petition if the petition is untimely, contains claims that could have been
12 litigated in previous proceedings, or if the petitioner unduly delays in filing a petition. NRS 34.800,
13 NRS 34.810, NRS 34.726.

14 **II. Parks' First Claim**

15 **A. Parks' First Claim**

16 Parks alleges ineffective assistance of trial counsel because counsel advised her to reject a more
17 favorable plea deal. SPWHC at 5. Parks rejected a stipulated sentence in the plea agreement and
18 subsequently received a longer prison sentence after both sides were free to argue for a lawful sentence.

19 **B. The Relevant Law**

20 In 2012, the United States Supreme Court decided *Lafler v. Cooper*, 566 U.S. 156 (2012) and
21 *Missouri v. Frye*, 566 U.S. 134 (2012).

22 In *Frye*, the Court held “that, as a general rule, defense counsel has the duty to communicate
23 formal offers from the prosecution to accept a plea on terms and conditions that may be favorable to the
24 accused.” 566 U.S. at 145. Allowing an offer to expire “without advising the defendant or allowing him
25 to consider it,” constituted deficient conduct on the part of defense counsel. *Frye*, 566 U.S. at 145.

26 In *Lafler v. Cooper*, the Court held that trial counsel’s advice, to reject a plea offer amounted to
27 ineffective assistance. 566 U.S. at 163. The Court found deficient the advice consisted of the attorney
28 advising the rejection of a plea offer which included a charge of assault with intent to murder, advising

Cooper of the fact that “the prosecution would be unable to establish intent to murder [the victim] because she had been shot below the waist.” *Id.* at 161. The Sixth Circuit found that counsel’s performance was deficient because counsel advised Cooper of “an incorrect legal rule.” *Id.* at 162 (citation to appellate decision omitted).

Prior to the holdings in *Lafler* and *Frye*, the United States Supreme Court held that the two-part test in *Strickland v. Washington*⁴ applies to plea bargaining. *Hill v. Lockhart*, 474 U.S. 52, 58 (1985). The Court found the deficient conduct prong remains unchanged. *Id.* at 58-59. A petitioner demonstrates prejudice by showing that “counsel’s constitutionally ineffective performance affected the outcome of the plea process.” *Id.* at 59. In *Lafler*, the Court found that in the case of a rejected offer, the petitioner must show the offer would have been accepted by petitioner and the court, and the results (convictions or sentence) would have been “less severe” than the results imposed by the judgment and sentence. 566 U.S. at 164.

The ultimate decision to accept or reject an offer remains with the defendant. *See, Wainwright v. Sykes*, 433 U.S. 72, 93 n.1 (1977) (Burger, C.J., concurring).

C. Parks’ Ground One Claim Fails to Allege Deficient Conduct on the Part of Trial Counsel

1.) The facts

The plea agreement in this case required a concurrent sentence between this case (C321808) and the sentence in C329886. The plea agreement also contained the statement “I reject a stipulated aggregate sentence of eight (8) to twenty (20) years concurrent to each other in this case and Case No. C329886, and understand the State may argue for more than the stipulated sentence.” Plea Agreement (filed November 5, 2018).

During the plea canvass, the Court specifically asked Parks if she rejected the stipulated sentence of eight to twenty years. APP 17-18. Parks stated that she did. *Id.* The Court also made sure Parks understood the fact that sentencing, including whether individual counts ran consecutive or concurrent to each other, was in the discretion of the Court. *Id.* at 22. The Court also ensured that Parks understood that “no one can promise you probation, leniency or any special treatment.” *Id.*

⁴ 466 U.S. 668 (1984).

1 Parks never advised the court during the plea canvass or in the plea agreement that the rejection
2 of the stipulated sentence was based solely on the advice of counsel. To the contrary, both the canvass
3 and plea agreement reflect that the rejection of the stipulated sentence was Parks' decision.

4 The sentencing memorandum provides the reasons why Parks rejected the stipulated sentence—
5 Parks thought an 8-20 year sentence too harsh. APP 55. That pleading argues that given; 1.) Parks and
6 her co-defendants committed no physical abuse, or negligent treatment (*id.* at 57-58), 2.) Parks was
7 never sanctioned by any court for perjury or perpetrating fraud in court filings (*id.* at 63), 3.) Parks' co-
8 defendant conducted most of the billing of wards (*id.* at 65-67), 4.) Parks herself protected wards from
9 exploitation (*id.* at 67-68), and 5.) Prior to her arrest in this case, Parks had never been jailed or
10 imprisoned, and disputes whether she (as opposed to co-defendants) committed all the crimes alleged in
11 the indictment. *Id.* at 74. Parks' memorandum concluded the recommendation in the Pre-Sentence
12 Investigation report (PSI) of 64-226 months (and the almost certainly higher request from the State)
13 "wrongfully punishes Parks for the actions of others." *Id.* at 73.

14 While Parks' reply to this answer may argue that Parks' counsel submitted the sentencing
15 memorandum, Parks' statements at sentencing reflect that counsel and Parks were of one mind
16 regarding the argument presented in the sentencing memorandum. At sentencing, it was Parks, not her
17 attorney who stated to the Court "so much of what was done was mischaracterized." *Id.* at 117. She
18 further stated, "I believe that the pre-sentencing memo that my attorney Mr. Goldstein filed speaks well
19 to what did happen." *Id.* at 118. Parks added, "Things could have been done better, or differently, but at
20 no time was anything done with any intent to harm." *Id.* Parks emphasized that they never physically
21 neglected or harmed anyone. *Id.* at 119.

22 At Parks' sentencing, the Court rejected the arguments of Parks and her counsel, as well as the
23 recommendation in the PSI and imposed an aggregated term of 16-40 years. *Id.* at 211-13.

24 **2.) Parks failed to meet her burden under *Strickland***

25 In order to demonstrate that her trial counsel was ineffective, Parks must demonstrate (1) that
26 counsel gave her constitutionally deficient advice; and (2) that she suffered prejudice as a result of
27 following the advice. *Lafler*, 566 U.S. at 164. In *Lafler*, the advice of counsel was deficient, because
28 nothing in the law stated that the State could not prove intent to murder based upon where the victim

1 was shot. *Id.* As discussed below, the record in this case presents no evidence of deficient conduct by
2 counsel.

3 **a.) Parks does not present any evidence of deficient advice by counsel**

4 By failing to plead the content of the rejected advice, Parks does not explain how the given
5 advice (if advice was given) was constitutionally deficient. *See Lafler*, 566 U.S. at 161.

6 In the present case, Parks’ petition alleges counsel advised her to reject a more favorable plea
7 deal. In the petition, Parks fails to state what advice counsel gave her (if counsel gave her any advice)
8 that caused her to reject the plea, as opposed to rejecting the stipulated sentence on her own accord. The
9 comments made by Parks at sentencing reflect that Parks failed to understand the seriousness of her
10 actions. A person not understanding the seriousness of her actions certainly would not believe that her
11 actions warranted a minimum prison term of 8 years. Parks clearly sought less than 8 years in prison (if
12 not probation). However, even if Parks’ attorney gave her advice to reject the stipulated sentence, the
13 advice is not constitutionally deficient if the advice was reasonable.

14 Whether to accept or reject a plea deal is ultimately the decision of the defendant, not counsel.
15 *Wainwright v. Sykes*, *supra*. Parks must prove that counsel’s advice was deficient, not merely wrong.
16 This Court’s scrutiny of trial counsel’s actions “must be highly deferential.” *Strickland*, 466 U.S. at
17 689. Because it is “all too easy” for a court to Monday morning quarterback the actions of counsel,
18 *Strickland* requires this Court’s assessment of counsel’s conduct to evaluate counsel’s conduct at the
19 time it was made.

20 **b.) Parks presents no evidence of constitutionally deficient advice**

21 Assuming Parks’ counsel gave advice, the question this Court must ask is not, “Was counsel’s
22 advice wrong?” Rather, the question is “Did counsel’s advice in this matter fall outside the range of
23 competence demanded of attorneys in criminal cases?” *Id.* at 687. There is a difference between
24 “wrong,” but not deficient advice and constitutionally deficient advice. “Wrong” advice is only wrong
25 in hindsight and can still be the product of sound strategy and reasonable given the circumstances.
26 Reasonable advice based upon a strategic decision is virtually unchallengeable under *Strickland*, even if
27 the advice is “wrong” in hindsight. *Id.* at 689. On the other hand, “constitutionally deficient” advice is
28 wrong no matter the outcome of the proceedings (and unreasonable). In this case, the decision to reject

1 the stipulation could be reasonable and the product of sound strategy, even though Parks received a
2 sentence higher than the rejected stipulation. Had Parks received the sentence recommended in the PSI,
3 Parks would not be presenting Ground One to the Court for consideration.

4 The sentencing memorandum presented reasonable, strategic reasons supporting a request for a
5 lower sentence than the stipulated 8 year minimum. The recommendation in the PSI reflected that these
6 arguments were not unreasonable. If counsel actually counseled Parks' to reject the stipulation, the
7 PSI's recommendation of a lower sentence supports a finding that counsel's advice was reasonable, not
8 constitutionally deficient.

9 In this case, the record reveals that Parks rejected a stipulated sentence. Parks' sentencing
10 memorandum (and statements to the Court) suggest that Parks sought a more lenient sentence of her
11 own accord, rather than rejecting the advice of counsel. In the sentencing memorandum, counsel
12 reasonably argued that several factors (including Parks' absence of a record) merited a lower sentence
13 than the stipulated sentence of 8-20 years. Parks' statements to the Court reflected her belief that her
14 actions may not have been wrong. However, if the actions were wrong, they did not merit a severe
15 prison sentence.

16 **c.) Parks does not satisfy the deficient conduct prong of *Strickland***

17 If Parks rejected the stipulated sentence on her own, the analysis is over. The Court must find
18 that counsel was not ineffective. If Parks relied on counsel's advice when rejecting the stipulation,
19 evidence in the record demonstrates that counsel's advice was strategic, not constitutionally deficient,
20 only wrong in hindsight. It is reasonable to argue for a lower sentence for a defendant given the fact
21 that this was Parks' first felony conviction. The fact that the PSI in this case recommended lower
22 minimum and maximum terms of imprisonment than the stipulated sentence demonstrates that seeking
23 a sentence lower than the rejected stipulated sentence was a reasonable decision.

24 The pleadings and record in this case contain no facts supporting a claim counsel gave
25 constitutionally deficient advice. The record reflects reasonable arguments for a lower sentence. The
26 PSI's recommendation affirms that rejecting the stipulation and seeking a lower sentence was a
27 reasonable strategic decision. The record does not support Parks' claim that counsel performed
28 deficiently (assuming counsel gave Parks advice to reject the stipulated sentence).

1 **D. Prejudice**

2 Parks’ petition assumes prejudice. Just because Parks received a higher sentence than the
3 stipulation does not evidence prejudice under *Strickland*. In order to demonstrate prejudice (assuming
4 deficient conduct on the part of counsel), Parks must show that the Court would have imposed the
5 stipulated sentence had Parks agreed to recommend a stipulated sentence. *Lafler*, 566 U.S. at 168 (there
6 is no federal right that a judge must accept or abide by a plea).

7 **E. Conclusion**

8 Parks has not alleged how counsel was deficient. There is a significant difference between
9 “wrong,” advice that was based on strategy and advice that is “constitutionally deficient: The latter
10 violates the defendant’s rights under the constitution. The former happens daily in criminal cases across
11 the country. Conflating the two would hold trial counsel to a requirement of performing perfectly in
12 every case. *Strickland* (and our constitution) requires competence, not perfection.

13 Failing to establish deficient conduct under *Strickland*, Respondents request the Court find that
14 Parks failed to satisfy her burden of establishing trial counsel was ineffective for allegedly giving
15 defective advice, and further find that Ground One is meritless.

16 **III. Ground Two**

17 In Ground Two of the supplemental petition, Parks alleges that trial counsel performed
18 ineffectively at her sentencing hearing. SPWHC at 9. Parks alleges: 1.) counsel failed to object to
19 improper arguments and present accurate information to rebut the State’s arguments (*id.* at 10), 2.)
20 failure to object to lack of notice about victim speakers (*id.* at 17), 3.) failure to object to the ordered
21 restitution (SPWHC at 24); 4.) failure to challenge the reasonableness of the sentence/the sentence
22 constituted cruel and unusual punishment. *Id.* at 28. These claims are procedurally defaulted under the
23 current state of Nevada law.

24 **A. Ground Two is Procedurally Defaulted Pursuant to NRS 34.810(1)**

25 **1.) NRS 34.810(1)**

26 Nevada law governs the procedure in state habeas proceedings. One of the habeas corpus
27 statutes, NRS 34.810(1)(a), limits the scope of claims in cases where the conviction is based upon a
28 plea, to those claims that allege “the *plea* was involuntarily or unknowingly entered” or “that the plea

1 was entered without effective assistance of counsel.”

2 **2.) *Gonzales v. State***

3 The Nevada Court of Appeals recently addressed the scope of claims that can be raised in a state
4 habeas petition challenging a judgment and sentence pursuant to a guilty plea. *Gonzales v. State*, 2020
5 WL 5889017 (NVCA, Order of Affirmance, October 1, 2020).⁵

6 The Court of Appeal in *Gonzales* held “both the plain language of the statute and the legislative
7 and statutory history of NRS 34.810(1)(a) demonstrate that the scope of claims that may be raised in a
8 postconviction petition challenging a conviction entered as a result of a guilty plea are limited to claims
9 that challenge the validity of the guilty plea.” *Id.* at *5. The Court of Appeals further held the claims
10 could be raised directly (the plea was not knowing intelligent or voluntary) or as a claim counsel was
11 ineffective during the plea process. *Id.*

12 The Court of Appeals in *Gonzales* found NRS 34.810(1)(a) barred Gonzales’ claims challenging
13 counsel’s effectiveness at the sentencing hearing because the claims did not address the plea, or
14 counsel’s ineffectiveness during the plea. *Id.* at *6.

15 **3.) Parks’ Ground Two claim is procedurally barred**

16 Because Parks’ Ground Two claim does not challenge the voluntariness of the plea, or the
17 effectiveness of counsel at the change of plea, Respondents request the Court apply *Gonzales* and find
18 that Ground Two is defaulted.

19 **IV. Ground Three**

20 In Ground Three of the supplemental petition, Parks alleges that counsel failed to file an appeal.
21 SPWHC at 33. Parks alleges that she specifically requested counsel file a notice of appeal. *Id.* at 34.

22 However, in the exhibits submitted by Parks, she submits a letter requesting counsel “get the
23 paperwork started for a sentence modification.” App 507. Parks’ counsel responded to Parks’ letter,
24 stating that the best option for obtaining a sentence modification was by filing a state habeas corpus
25 petition, and requesting appointment of counsel through the court. *Id.* at 508-09. Both letters reference
26 an in-person discussion that took place after sentencing.

27 ///

28 ⁵ Nev. Adv. Op. 60

1 **A. Out of Time Appeals**

2 The Nevada Rules of Appellate Procedure (NRAP) address how to file an untimely appeal from
3 a judgment of conviction. NRAP 4(c)(1).

4 **B. How to Construe the Letters Exchanged Between Counsel and Parks**

5 Based upon the exhibits provided with the supplemental petition, a genuine issue of material
6 fact exists. That issue is: Whether Parks and counsel agreed that counsel should file a direct appeal, or
7 whether Parks would file a habeas corpus petition after their in-person meeting that took place after
8 sentencing. A plain reading of the letters exchanged between Parks and trial counsel reflect that Parks
9 and trial counsel discussed and agreed upon a strategy of how to proceed to obtain reconsideration of
10 Parks' sentence. However, Parks appears to have forgotten exactly what was stated and how to proceed.
11 App 507. Counsel's response appears to reiterate what counsel and Parks previously agreed upon. Id. at
12 508-09.

13 Parks' letter cannot be construed upon as a request for an appeal. Parks clearly did not ask for an
14 appeal. While the supplemental petition states that the letter should be construed as a request to file a
15 notice of appeal, the more reasonable construction of the letter is Parks asking counsel to inform her
16 how to proceed based upon her inability to remember what was discussed. Counsel's response clearly
17 reflected that after discussing the matter, counsel and Parks agreed that she would file a state habeas
18 petition challenging counsel's effectiveness during the sentencing proceeding. A person without
19 knowledge or experience in criminal law would more likely use the term "appeal" to request an appeal
20 as opposed to the phrase "sentence modification."

21 **C. An Evidentiary Hearing May Be Necessary**

22 Respondents concede that on Ground Three an evidentiary hearing could be necessary for this
23 Court to issue findings pursuant to NRAP 4(c)(1)(B). See, Nika v. State, 124 Nev. 1272, 1300-01, 198
24 P.3d 839, 858 (2008) (an evidentiary hearing is warranted when a petition "asserts specific factual
25 allegations that are not belied or repelled by the record and that, if true, would entitle [] relief"). Only
26 after hearing from the parties regarding the in-person meeting will this Court be able to determine the
27 merit of this claim. Without evidence of the nature of the discussions, and what specific challenges
28 were contemplated, the Court may be unable to determine whether an appeal, or a state habeas petition

1 was the agreed upon course of conduct.

2 **CONCLUSION**

3 For the reasons stated herein, Respondents request the Court deny Grounds One and Two of
4 Parks' supplemental habeas corpus petition. In order to determine whether Ground Three of the petition
5 warrants relief in the form of an untimely appeal, this Court should conduct an evidentiary hearing to
6 determine the content of the discussions between Parks and trial counsel during the meeting that took
7 place after Parks' sentencing hearing.

8 RESPECTFULLY SUBMITTED this 31st day of December 2020.

9 AARON D. FORD
10 Attorney General

11 By: /s/ Michael J. Bongard
12 Michael J. Bongard
13 Senior Deputy Attorney General
14 Nevada Bar No. 007997
15 mbongard@ag.nv.gov
16 Post-Conviction Division
17 1539 Avenue F, Suite 2
18 Ely, Nevada 89301
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AFFIRMATION
Pursuant to NRS 239B.030

The undersigned does hereby affirm that this pleading filed in the Eighth Judicial District Court does not contain the social security number of any person.

DATED this 31st day of December 2020.

AARON D. FORD
Attorney General

By: /s/ Michael J. Bongard
Michael J. Bongard
Senior Deputy Attorney General
Nevada Bar No. 007997
mbongard@ag.nv.gov
Post-Conviction Division
1539 Avenue F, Suite 2
Ely, Nevada 89301

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing *Answer to Post-Conviction Petition for*
3 *Writ of Habeas Corpus* with the Clerk of the Court by using the electronic filing system on the 31st day
4 of December 2020.

5 The following participants in this case are registered electronic filing system users and will be
6 served electronically:

7 Jamie J. Resch
8 RESCH LAW, PLLC
9 2620 Regatta Dr., Suite 102
Las Vegas, Nevada, 89128
Jresch@convictionsolutions.com

10 /s/ M. Landreth
11 An Employee of the office of the Attorney General
12
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14
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23
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27
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Exhibit 1

Indictment

ORIGINAL

1 IND

2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565

5 JAY P. RAMAN
6 Chief Deputy District Attorney

7 Nevada Bar #010193

8 ADAM P. LAXALT

9 Nevada Attorney General

10 Nevada Bar #012426

11 DANIEL E. WESTMEYER

12 Senior Deputy Attorney General

13 Nevada Bar #010273

14 200 Lewis Avenue

15 Las Vegas, Nevada 89155-2212

16 (702) 671-2500

17 Attorney for Plaintiff

FILED IN OPEN COURT

STEVEN D. GRIERSON

CLERK OF THE COURT

MAR 08 2017

BY: 
DULCE MARIE ROMEA, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,

13 Plaintiff,

CASE NO: C-17-321808-1

14 -vs-

DEPT NO: X

15 APRIL PARKS #1571645

16 MARK SIMMONS

17 GARY NEAL TAYLOR

18 NOEL PALMER SIMPSON

Defendant(s).

INDICTMENT

19 STATE OF NEVADA }

20 COUNTY OF CLARK }

ss.

21 The Defendant(s) above named, APRIL PARKS, MARK SIMMONS, GARY NEAL
22 TAYLOR, and NOEL PALMER SIMPSON, are accused by the Clark County Grand Jury of
23 the crimes of RACKETEERING (Category B Felony - NRS 207.400 - NOC 53190); THEFT
24 (Category B Felony - NRS 205.0832, 205.0835.4 - NOC 55991); EXPLOITATION OF AN
25 OLDER PERSON (Category B Felony - NRS 200.5092, 200.5099 - NOC 50304);
26 EXPLOITATION OF AN OLDER PERSON/VULNERABLE PERSON (Category B Felony
27 - NRS 200.5092, 200.5099 - NOC 55984); THEFT (Category C Felony - NRS 205.0832,
28 205.0835.3 - NOC 55989); OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

C-17-321808-1

IND
Indictment
4830111



AA 0710

123

1 (Category C Felony - NRS 239.330 - NOC 52399) and PERJURY (Category D Felony - NRS
2 199.120 - NOC 52971), committed at and within the County of Clark, State of Nevada, on or
3 between December 21, 2011 and July 6, 2016, as follows:

4 COUNT 1 - RACKETEERING

5 Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR, did on
6 or between December 21, 2011 and July 6, 2016, then and there, within Clark County, Nevada,
7 knowingly, willfully and feloniously, while employed by or associated with an enterprise,
8 conduct or participate either directly or indirectly, in racketeering activity through the affairs
9 of said enterprise, and/or in the affairs of the enterprise through racketeering activity, did
10 engage in said acts, to wit: by Defendants working for A Private Professional Guardian, LLC
11 using their position to steal funds belonging to elderly and disabled persons over whom they
12 had guardianship authority, through the use of a series of fraudulent billing practices, said
13 activity constituting Racketeering contrary to NRS 207.400 (1)(c)(2). Defendants APRIL
14 PARKS and MARK SIMMONS also intentionally organized, managed, directed, and
15 supervised a criminal syndicate as defined in NRS 207.370, namely A Private Professional
16 Guardian, LLC, a business that was formed on May 23, 2011, that had at various times between
17 3 and 7 employees and continued to engage in or had the purpose of engaging in racketeering
18 activity even when individual members entered or left the organization, all contrary to NRS
19 207.400 (1)(d). Defendants APRIL PARKS and MARK SIMMONS also conspired to violate
20 the provisions of the racketeering statutes, contrary to NRS 207.400 (1)(j). The Defendants
21 engaged in racketeering activity by committing numerous crimes involving taking property
22 from another under circumstances not amounting to robbery, perjury or subornation of perjury,
23 and offering false evidence. Through this racketeering activity, APRIL PARKS and MARK
24 SIMMONS stole approximately \$559,205.32 from 150 victims, as further alleged in Counts
25 2-270 and incorporated by reference as though fully set forth herein; Defendants are criminally
26 liable under one or more of the following principles of criminal liability, to wit: (1) by directly
27 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
28 the intent that this crime be committed, by providing counsel and/or encouragement and by

1 entering into a course of conduct whereby APRIL PARKS and MARK SIMMONS operated
2 A Private Professional Guardian, LLC, and worked as guardians and fiduciaries and engaged
3 in various billing schemes to illegally obtain money from elderly and vulnerable people under
4 guardianship, as well as non-guardianship assets, as alleged in Counts 2 through 270, and
5 whereby GARY NEAL TAYLOR acted as agent of said entity and/or obtained monies from a
6 bank account in the name of said entity by engaging in said exploitative billing schemes and
7 conspiring to over bill for house checks, court trips, and/or other unnecessary services; and/or
8 (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

9 COUNT 2 - THEFT

10 Defendants APRIL PARKS and MARK SIMMONS did on or between May 3, 2012
11 and July 11, 2012 willfully, knowingly, feloniously, and without lawful authority, use the
12 services or property of another person entrusted to them, or placed in their possession for a
13 limited, authorized period of determined or prescribed duration or for a limited use, having a
14 value of \$3,500.00 or more, belonging to AUDREY WEBER and/or the ESTATE OF
15 AUDREY WEBER, in the following manner, to wit: through the use of a false billing scheme,
16 thereby unlawfully converting money belonging to AUDREY WEBER and/or the ESTATE
17 OF AUDREY WEBER in the amount of approximately \$3,819.60. Defendants are criminally
18 liable under one or more of the following principles of criminal liability, to wit: (1) by directly
19 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
20 the intent that this crime be committed, by providing counsel and/or encouragement and by
21 entering into a course of conduct whereby APRIL PARKS acted as guardian for AUDREY
22 WEBER and overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on
23 behalf of A Private Professional Guardian, LLC that either did not benefit AUDREY WEBER
24 or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson
25 to do the same; and MARK SIMMONS documented the same ward visits, shopping trips,
26 bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either
27 did not benefit AUDREY WEBER or did not occur, and/or directed Angelica Sanchez and/or

28 ///

1 Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to
2 commit this crime, with the intent that the crime be committed.

3 COUNT 3 - THEFT

4 Defendant APRIL PARKS did on or about July 10, 2012 willfully, knowingly,
5 feloniously, and without lawful authority, convert, make an unauthorized transfer of an interest
6 in, or without authorization control property, having a value of \$3,500.00, or more, belonging
7 to WILLIAM FLEWELLEN and/or the ESTATE OF WILLIAM FLEWELLEN, in the
8 following manner, to wit: by misrepresenting that guardianship papers presented to Bank of
9 America authorized her to control said property, knowing this to be false, with the intent to
10 deprive WILLIAM FLEWELLEN and/or the ESTATE OF WILLIAM FLEWELLEN, of
11 control of his property, said property having a value of approximately \$4,807.61.

12 COUNT 4 - THEFT

13 Defendants APRIL PARKS and NOEL PALMER SIMPSON did on between August
14 22, 2011 and May 15, 2012 willfully, knowingly, feloniously, and without lawful authority,
15 obtain lawful money of the United States in the amount of \$3,500.00 or more, belonging to
16 JOHN DENTON and/or SALLY DENTON, by a material misrepresentation with intent to
17 deprive those persons of the property, in the following manner, to wit: by APRIL PARKS
18 exceeding her authority as guardian of MARY WOODS changing MARY WOODS' life
19 insurance beneficiary from JOHN DENTON and/or SALLY DENTON to herself, without
20 court permission; and by NOEL PALMER SIMPSON filing a Petition to Set Aside Estate
21 Without Administration in the Clark County District Court, containing false statements in the
22 probate case of MARY WOODS, and unlawfully changing MARY WOODS' life insurance
23 beneficiary from JOHN DENTON and/or SALLY DENTON to the ESTATE OF MARY
24 WOODS, thereby depriving JOHN DENTON and/or SALLY DENTON of \$25,278.57, from
25 which NOEL PALMER SIMPSON was paid \$9,196.70. Defendants are criminally liable
26 under one or more of the following principles of criminal liability, to wit: (1) by directly
27 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
28 the intent that this crime be committed, by providing counsel and/or encouragement and by

1 entering into a course of conduct whereby by APRIL PARKS exceeded her authority as
2 guardian of MARY WOODS and changed MARY WOODS' life insurance beneficiary from
3 JOHN DENTON and/or SALLY DENTON to herself, without court permission; and whereby
4 NOEL PALMER SIMPSON filed a Petition to Set Aside Estate Without Administration in the
5 Clark County District Court, containing false statements in the probate case of MARY
6 WOODS P-12-074144-E, and unlawfully changing MARY WOODS' life insurance
7 beneficiary from JOHN DENTON and/or SALLY DENTON to the ESTATE OF MARY
8 WOODS; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
9 crime be committed.

10 COUNT 5 - THEFT

11 Defendant APRIL PARKS did on or about December 29, 2011 willfully, knowingly,
12 feloniously, and without lawful authority, convert, make an unauthorized transfer of an interest
13 in, or without authorization control property, having a value of \$3,500.00, or more, belonging
14 to BAXTER BURNS and/or the ESTATE OF BAXTER BURNS and/or THE BURNS
15 FAMILY TRUST, in the following manner, to wit: by misrepresenting that guardianship
16 papers presented to Bank of America authorized her to control said property which allowed
17 her to unlawfully control trust assets, knowing this to be false, with the intent to deprive
18 BAXTER BURNS and/or the ESTATE OF BAXTER BURNS and/or THE BURNS FAMILY
19 TRUST, of his property, said property having a value of approximately \$32,006.72.

20 COUNT 6 - EXPLOITATION OF AN OLDER PERSON

21 Defendants APRIL PARKS and MARK SIMMONS did on or between December 3,
22 2012 and November 4, 2013 willfully, unlawfully and feloniously exploit an older person
23 having been born in 1922, to wit: DOROTHY TRUMBICH and/or THE DOROTHY A.
24 TRUMBICH REVOKABLE TRUST, by use of a guardianship converting DOROTHY
25 TRUMBICH's money, assets or property, Defendants intending to permanently deprive
26 DOROTHY TRUMBICH of the ownership, use, benefit or possession of his money, assets or
27 property having an value of more than \$5,000.00, by working in their role as guardian and
28 fiduciary, overbilling for visits, shopping trips, court filings, banking visits, and/or by

1 unlawfully controlling trust assets, thereby exploiting DOROTHY TRUMBICH in the amount
2 of approximately \$167,204.49. Defendants are criminally liable under one or more of the
3 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
4 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
5 committed, by providing counsel and/or encouragement and by entering into a course of
6 conduct whereby APRIL PARKS acted as guardian for DOROTHY TRUMBICH and
7 overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A
8 Private Professional Guardian, LLC that either did not benefit DOROTHY TRUMBICH or
9 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
10 do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank
11 deposits, and/or by unlawfully controlling assets from THE DOROTHY A. TRUMBICH
12 REVOKABLE TRUST and/or other tasks on behalf of A Private Professional Guardian, LLC
13 that either did not benefit DOROTHY TRUMBICH or did not occur, and/or directed Angelica
14 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a
15 conspiracy to commit this crime, with the intent that the crime be committed.

16 COUNT 7 - THEFT

17 Defendants APRIL PARKS and MARK SIMMONS did on or between January 4, 2013
18 and November 4, 2013 willfully, knowingly, feloniously, and without lawful authority, use the
19 services or property of another person entrusted to them, or placed in their possession for a
20 limited, authorized period of determined or prescribed duration or for a limited use, having a
21 value of \$3,500.00 or more, belonging to DOROTHY TRUMBICH and/or the ESTATE OF
22 DOROTHY TRUMBICH and/or THE DOROTHY A. TRUMBICH REVOKABLE TRUST,
23 in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling
24 for visits, shopping trips, court filings, banking visits. and/or by unlawfully controlling trust
25 assets, thereby unlawfully converting money belonging to DOROTHY TRUMBICH and/or
26 THE DOROTHY A. TRUMBICH REVOKABLE TRUST in the amount of approximately
27 \$167,204.49. Defendants are criminally liable under one or more of the following principles
28 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or

1 abetting in the commission of this crime, with the intent that this crime be committed, by
2 providing counsel and/or encouragement and by entering into a course of conduct whereby
3 APRIL PARKS acted as guardian for DOROTHY TRUMBICH and overcharged for ward
4 visits, shopping trips, bank deposits, and/or unlawfully control the assets of THE DOROTHY
5 A. TRUMBICH REVOKABLE TRUST and/or other tasks on behalf of A Private Professional
6 Guardian, LLC that either did not benefit DOROTHY TRUMBICH or did not occur, and/or
7 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and
8 MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or
9 other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
10 DOROTHY TRUMBICH or did not occur, and/or directed Angelica Sanchez and/or Heidi
11 Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this
12 crime, with the intent that the crime be committed.

13 COUNT 8 - EXPLOITATION OF AN OLDER PERSON

14 Defendants APRIL PARKS and MARK SIMMONS did on or between April 16, 2013
15 and November 3, 2015 willfully, unlawfully and feloniously exploit an older person having
16 been born in 1925, to wit: RUTH BRASLOW, by Defendants, having the trust or confidence
17 of RUTH BRASLOW or by use of a power of attorney or guardianship, obtain control, through
18 deception, intimidation or undue influence, over RUTH BRASLOW's money, assets or
19 property and/or by converting RUTH BRASLOW's money, assets or property, Defendants
20 intending to permanently deprive RUTH BRASLOW of the ownership, use, benefit or
21 possession of her money, assets or property having an value of more than \$5,000.00, by
22 working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court
23 filings, banking visits, and fraudulent fees thereby exploiting RUTH BRASLOW in the
24 amount of approximately \$13,180.67. Defendants are criminally liable under one or more of
25 the following principles of criminal liability, to wit: (1) by directly committing this crime;
26 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
27 be committed, by providing counsel and/or encouragement and by entering into a course of
28 conduct whereby APRIL PARKS acted as guardian for RUTH BRASLOW and overcharged

1 for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
2 Professional Guardian, LLC that either did not benefit RUTH BRASLOW or did not occur,
3 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
4 and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits,
5 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
6 RUTH BRASLOW or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
7 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
8 with the intent that the crime be committed.

9 COUNT 9 - THEFT

10 Defendants APRIL PARKS and MARK SIMMONS did on or between April 16, 2013
11 and November 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
12 services or property of another person entrusted to them, or placed in their possession for a
13 limited, authorized period of determined or prescribed duration or for a limited use, having a
14 value of \$3,500.00 or more, belonging to RUTH BRASLOW and/or the ESTATE OF RUTH
15 BRASLOW, in the following manner, to wit: by working in their role as guardian and
16 fiduciary, overbilling for visits, shopping trips, court filings, banking visits, and fraudulent
17 fees thereby unlawfully converting money belonging to RUTH BRASLOW in the amount of
18 approximately \$13,180.67. Defendants are criminally liable under one or more of the
19 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
20 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
21 committed, by providing counsel and/or encouragement and by entering into a course of
22 conduct whereby APRIL PARKS acted as guardian for RUTH BRASLOW and overcharged
23 for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
24 Professional Guardian, LLC that either did not benefit RUTH BRASLOW or did not occur,
25 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
26 and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits,
27 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
28 RUTH BRASLOW or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer

1 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
2 with the intent that the crime be committed.

3 COUNT 10 - EXPLOITATION OF AN OLDER PERSON

4 Defendants APRIL PARKS and MARK SIMMONS did on or between October 4, 2013
5 and November 4, 2015 willfully, unlawfully and feloniously exploit an older person having
6 been born in 1948, to wit: JAMES POYA, by use of a guardianship, obtain control over
7 JAMES POYA's money, assets or property and/or by converting JAMES POYA's money,
8 assets or property, Defendants intending to permanently deprive JAMES POYA of the
9 ownership, use, benefit or possession of his money, assets or property having an value of more
10 than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits,
11 shopping trips, court filings, and banking visits thereby exploiting JAMES POYA in the
12 amount of approximately \$6,032.50. Defendants are criminally liable under one or more of the
13 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
14 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
15 committed, by providing counsel and/or encouragement and by entering into a course of
16 conduct whereby APRIL PARKS acted as guardian for JAMES POYA and overcharged for
17 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
18 Professional Guardian, LLC that either did not benefit JAMES POYA or did not occur, and/or
19 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and
20 MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or
21 other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
22 JAMES POYA or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or
23 Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the
24 intent that the crime be committed.

25 COUNT 11 - THEFT

26 Defendants APRIL PARKS and MARK SIMMONS did on or between October 4, 2013
27 and November 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
28 services or property of another person entrusted to them, or placed in their possession for a

1 limited, authorized period of determined or prescribed duration or for a limited use, having a
2 value of \$3,500.00 or more, belonging to JAMES POYA and/or the ESTATE OF JAMES
3 POYA, in the following manner, to wit: by working in their role as guardian and fiduciary,
4 overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully
5 converting money belonging to JAMES POYA in the amount of approximately \$6,032.50.
6 Defendants are criminally liable under one or more of the following principles of criminal
7 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
8 commission of this crime, with the intent that this crime be committed, by providing counsel
9 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
10 as guardian for JAMES POYA and overcharged for ward visits, shopping trips, bank deposits,
11 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
12 JAMES POYA or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or
13 Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits,
14 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
15 LLC that either did not benefit JAMES POYA or did not occur, and/or directed Angelica
16 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a
17 conspiracy to commit this crime, with the intent that the crime be committed.

18 COUNT 12 - EXPLOITATION OF AN OLDER PERSON

19 Defendants APRIL PARKS and MARK SIMMONS did on or between November 3,
20 2014 and November 3, 2015 willfully, unlawfully and feloniously exploit an older person
21 having been born in 1942, to wit: CAROLYN RICKENBAUGH, by use of a guardianship
22 converting CAROLYN RICKENBAUGH's money, assets or property, Defendants intending
23 to permanently deprive CAROLYN RICKENBAUGH of the ownership, use, benefit or
24 possession of her money, assets or property having an value of more than \$650.00, by working
25 in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and
26 banking visits thereby exploiting CAROLYN RICKENBAUGH in the amount of
27 approximately \$3,804.39. Defendants are criminally liable under one or more of the following
28 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by

1 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
2 by providing counsel and/or encouragement and by entering into a course of conduct whereby
3 APRIL PARKS acted as guardian for CAROLYN RICKENBAUGH and overcharged for
4 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
5 Professional Guardian, LLC that either did not benefit CAROLYN RICKENBAUGH or did
6 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do
7 the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank
8 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
9 not benefit CAROLYN RICKENBAUGH or did not occur, and/or directed Angelica Sanchez
10 and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy
11 to commit this crime, with the intent that the crime be committed.

12 COUNT 13 - THEFT

13 Defendants APRIL PARKS and MARK SIMMONS did on or between November 3,
14 2014 and November 3, 2015 willfully, knowingly, feloniously, and without lawful authority,
15 use the services or property of another person entrusted to them, or placed in their possession
16 for a limited, authorized period of determined or prescribed duration or for a limited use,
17 having a value of \$3,500.00 or more, belonging to CAROLYN RICKENBAUGH and/or the
18 ESTATE OF CAROLYN RICKENBAUGH, in the following manner, to wit: by working in
19 their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and
20 banking visits thereby unlawfully converting money belonging to CAROLYN
21 RICKENBAUGH in the amount of approximately \$3,804.39. Defendants are criminally liable
22 under one or more of the following principles of criminal liability, to wit: (1) by directly
23 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
24 the intent that this crime be committed, by providing counsel and/or encouragement and by
25 entering into a course of conduct whereby APRIL PARKS acted as guardian for CAROLYN
26 RICKENBAUGH and overcharged for ward visits, shopping trips, bank deposits, and/or other
27 tasks on behalf of A Private Professional Guardian, LLC that either did not benefit CAROLYN
28 RICKENBAUGH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer

1 and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits,
2 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
3 LLC that either did not benefit CAROLYN RICKENBAUGH or did not occur, and/or directed
4 Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant
5 to a conspiracy to commit this crime, with the intent that the crime be committed.

6 COUNT 14 - EXPLOITATION OF AN OLDER PERSON

7 Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013
8 and November 4, 2015 willfully, unlawfully and feloniously exploit an older person having
9 been born in 1930, to wit: DELMOND FOSTER, by use of a guardianship converting
10 DELMOND FOSTER's money, assets or property, Defendants intending to permanently
11 deprive DELMOND FOSTER of the ownership, use, benefit or possession of his money,
12 assets or property having an value of more than \$5,000.00, by working in their role as guardian
13 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
14 exploiting DELMOND FOSTER in the amount of approximately \$5,134.40. Defendants are
15 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
16 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
17 crime, with the intent that this crime be committed, by providing counsel and/or
18 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
19 guardian for DELMOND FOSTER and overcharged for ward visits, shopping trips, bank
20 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
21 not benefit DELMOND FOSTER or did not occur, and/or directed Angelica Sanchez and/or
22 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
23 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
24 Professional Guardian, LLC that either did not benefit DELMOND FOSTER or did not occur,
25 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
26 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
27 committed.

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1 COUNT 15 - THEFT

2 Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013
3 and November 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
4 services or property of another person entrusted to them, or placed in their possession for a
5 limited, authorized period of determined or prescribed duration or for a limited use, having a
6 value of \$3,500.00 or more, belonging to DELMOND FOSTER and/or the ESTATE OF
7 DELMOND FOSTER, in the following manner, to wit: by working in their role as guardian
8 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
9 unlawfully converting money belonging to DELMOND FOSTER in the amount of
10 approximately \$5,134.40. Defendants are criminally liable under one or more of the following
11 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
12 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
13 by providing counsel and/or encouragement and by entering into a course of conduct whereby
14 APRIL PARKS acted as guardian for DELMOND FOSTER and overcharged for ward visits,
15 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
16 LLC that either did not benefit DELMOND FOSTER or did not occur, and/or directed
17 Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK
18 SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other
19 tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
20 DELMOND FOSTER or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
21 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
22 with the intent that the crime be committed.

23 COUNT 16 - EXPLOITATION OF AN OLDER PERSON

24 Defendants APRIL PARKS and MARK SIMMONS did on or between April 2, 2013
25 and November 4, 2015 willfully, unlawfully and feloniously exploit an older person having
26 been born in 1928, to wit: WILLIAM BRADY, by use of a guardianship converting
27 WILLIAM BRADY's money, assets or property, Defendants intending to permanently
28 deprive WILLIAM BRADY of the ownership, use, benefit or possession of his money, assets

1 or property having an value of more than \$5,000.00, by working in their role as guardian and
2 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
3 exploiting WILLIAM BRADY in the amount of approximately \$9,470.80. Defendants are
4 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
5 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
6 crime, with the intent that this crime be committed, by providing counsel and/or
7 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
8 guardian for WILLIAM BRADY and overcharged for ward visits, shopping trips, bank
9 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
10 not benefit WILLIAM BRADY or did not occur, and/or directed Angelica Sanchez and/or
11 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
12 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
13 Professional Guardian, LLC that either did not benefit WILLIAM BRADY or did not occur,
14 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
15 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
16 committed.

17 COUNT 17 - THEFT

18 Defendants APRIL PARKS and MARK SIMMONS did on or between April 2, 2013
19 and November 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
20 services or property of another person entrusted to them, or placed in their possession for a
21 limited, authorized period of determined or prescribed duration or for a limited use, having a
22 value of \$3,500.00 or more, belonging to WILLIAM BRADY and/or the ESTATE OF
23 WILLIAM BRADY, in the following manner, to wit: by working in their role as guardian and
24 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
25 unlawfully converting money belonging to WILLIAM BRADY in the amount of
26 approximately \$9,470.80. Defendants are criminally liable under one or more of the following
27 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
28 aiding or abetting in the commission of this crime, with the intent that this crime be committed,

1 by providing counsel and/or encouragement and by entering into a course of conduct whereby
2 APRIL PARKS acted as guardian for WILLIAM BRADY and overcharged for ward visits,
3 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
4 LLC that either did not benefit WILLIAM BRADY or did not occur, and/or directed Angelica
5 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
6 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
7 of A Private Professional Guardian, LLC that either did not benefit WILLIAM BRADY or did
8 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do
9 the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
10 crime be committed.

11 COUNT 18 - EXPLOITATION OF AN OLDER PERSON

12 Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013
13 and September 3, 2015 willfully, unlawfully and feloniously exploit an older person having
14 been born in 1931, to wit: PATRICIA SMOAK, by use of a guardianship converting
15 PATRICIA SMOAK's money, assets or property, Defendants intending to permanently
16 deprive PATRICIA SMOAK of the ownership, use, benefit or possession of her money, assets
17 or property having an value of more than \$5,000.00, by working in their role as guardian and
18 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
19 exploiting PATRICIA SMOAK in the amount of approximately \$5,563.60. Defendants are
20 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
21 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
22 crime, with the intent that this crime be committed, by providing counsel and/or
23 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
24 guardian for PATRICIA SMOAK and overcharged for ward visits, shopping trips, bank
25 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
26 not benefit PATRICIA SMOAK or did not occur, and/or directed Angelica Sanchez and/or
27 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
28 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private

1 Professional Guardian, LLC that either did not benefit PATRICIA SMOAK or did not occur,
2 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
3 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
4 committed.

5 COUNT 19 - THEFT

6 Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013
7 and September 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use
8 the services or property of another person entrusted to them, or placed in their possession for
9 a limited, authorized period of determined or prescribed duration or for a limited use, having
10 a value of \$3,500.00 or more, belonging to PATRICIA SMOAK and/or the ESTATE OF
11 PATRICIA SMOAK, in the following manner, to wit: by working in their role as guardian and
12 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
13 unlawfully converting money belonging to PATRICIA SMOAK in the amount of
14 approximately \$5,563.60. Defendants are criminally liable under one or more of the following
15 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
16 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
17 by providing counsel and/or encouragement and by entering into a course of conduct whereby
18 APRIL PARKS acted as guardian for PATRICIA SMOAK and overcharged for ward visits,
19 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
20 LLC that either did not benefit PATRICIA SMOAK or did not occur, and/or directed Angelica
21 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
22 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
23 of A Private Professional Guardian, LLC that either did not benefit PATRICIA SMOAK or
24 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
25 do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
26 crime be committed.

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1 COUNT 20 - EXPLOITATION OF AN OLDER PERSON

2 Defendants APRIL PARKS and MARK SIMMONS did on or between October 24,
3 2013 and September 3, 2015 willfully, unlawfully and feloniously exploit an older person
4 having been born in 1934, to wit: MARILYN SCHOLL, by use of a guardianship converting
5 MARILYN SCHOLL's money, assets or property, Defendants intending to permanently
6 deprive MARILYN SCHOLL of the ownership, use, benefit or possession of her money, assets
7 or property having an value of more than \$5,000.00, by working in their role as guardian and
8 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
9 exploiting MARILYN SCHOLL in the amount of approximately \$6,262.48. Defendants are
10 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
11 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
12 crime, with the intent that this crime be committed, by providing counsel and/or
13 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
14 guardian for MARILYN SCHOLL and overcharged for ward visits, shopping trips, bank
15 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
16 not benefit MARILYN SCHOLL or did not occur, and/or directed Angelica Sanchez and/or
17 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
18 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
19 Professional Guardian, LLC that either did not benefit MARILYN SCHOLL or did not occur,
20 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
21 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
22 committed.

23 COUNT 21 - THEFT

24 Defendants APRIL PARKS and MARK SIMMONS did on or between October 24,
25 2013 and September 3, 2015 willfully, knowingly, feloniously, and without lawful authority,
26 use the services or property of another person entrusted to them, or placed in their possession
27 for a limited, authorized period of determined or prescribed duration or for a limited use,
28 having a value of \$3,500.00 or more, belonging to MARILYN SCHOLL and/or the ESTATE

OF MARILYN SCHOLL, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to MARILYN SCHOLL in the amount of approximately \$6,262.48. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for MARILYN SCHOLL and overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit MARILYN SCHOLL or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit MARILYN SCHOLL or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 22 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between January 5, 2015 and September 3, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1944, to wit: KENNETH EDWARDS, by use of a guardianship converting KENNETH EDWARDS' money, assets or property, Defendants intending to permanently deprive KENNETH EDWARDS of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting KENNETH EDWARDS in the amount of approximately \$2,622.62. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or

1 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
2 guardian for KENNETH EDWARDS and overcharged for ward visits, shopping trips, bank
3 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
4 not benefit KENNETH EDWARDS or did not occur, and/or directed Angelica Sanchez and/or
5 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
6 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
7 Professional Guardian, LLC that either did not benefit KENNETH EDWARDS or did not
8 occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the
9 same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime
10 be committed.

11 COUNT 23 - THEFT

12 Defendants APRIL PARKS and MARK SIMMONS did on or between January 5, 2015
13 and September 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use
14 the services or property of another person entrusted to them, or placed in their possession for
15 a limited, authorized period of determined or prescribed duration or for a limited use, having
16 a value of \$650.00 or more, belonging to KENNETH EDWARDS and/or the ESTATE OF
17 KENNETH EDWARDS, in the following manner, to wit: by working in their role as guardian
18 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
19 unlawfully converting money belonging to KENNETH EDWARDS in the amount of
20 approximately \$2,622.62. Defendants are criminally liable under one or more of the following
21 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
22 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
23 by providing counsel and/or encouragement and by entering into a course of conduct whereby
24 APRIL PARKS acted as guardian for KENNETH EDWARDS and overcharged for ward
25 visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional
26 Guardian, LLC that either did not benefit KENNETH EDWARDS or did not occur, and/or
27 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and
28 MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or

1 other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
2 KENNETH EDWARDS or did not occur, and/or directed Angelica Sanchez and/or Heidi
3 Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this
4 crime, with the intent that the crime be committed.

5 COUNT 24 - EXPLOITATION OF AN OLDER PERSON

6 Defendants APRIL PARKS and MARK SIMMONS did on or between September 5,
7 2013 and September 17, 2015 willfully, unlawfully and feloniously exploit an older person
8 having been born in 1931, to wit: GLORIA SCHNERINGER, by use of a guardianship
9 converting GLORIA SCHNERINGER's money, assets or property, Defendants intending to
10 permanently deprive GLORIA SCHNERINGER of the ownership, use, benefit or possession
11 of her money, assets or property having an value of more than \$650.00, by working in their
12 role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking
13 visits thereby exploiting GLORIA SCHNERINGER in the amount of approximately
14 \$2,830.50. Defendants are criminally liable under one or more of the following principles of
15 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting
16 in the commission of this crime, with the intent that this crime be committed, by providing
17 counsel and/or encouragement and by entering into a course of conduct whereby APRIL
18 PARKS acted as guardian for GLORIA SCHNERINGER and overcharged for ward visits,
19 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
20 LLC that either did not benefit GLORIA SCHNERINGER or did not occur, and/or directed
21 Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK
22 SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other
23 tasks on behalf of A Private Professional Guardian, LLC that either did not benefit GLORIA
24 SCHNERINGER or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
25 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
26 with the intent that the crime be committed.

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1 COUNT 25 - THEFT

2 Defendants APRIL PARKS and MARK SIMMONS did on or between September 5,
3 2013 and September 17, 2015 willfully, knowingly, feloniously, and without lawful authority,
4 use the services or property of another person entrusted to them, or placed in their possession
5 for a limited, authorized period of determined or prescribed duration or for a limited use,
6 having a value of \$650.00 or more, belonging to GLORIA SCHNERINGER and/or the
7 ESTATE OF GLORIA SCHNERINGER, in the following manner, to wit: by working in their
8 role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking
9 visits thereby unlawfully converting money belonging to GLORIA SCHNERINGER in the
10 amount of approximately \$2,830.50. Defendants are criminally liable under one or more of
11 the following principles of criminal liability, to wit: (1) by directly committing this crime;
12 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
13 be committed, by providing counsel and/or encouragement and by entering into a course of
14 conduct whereby APRIL PARKS acted as guardian for GLORIA SCHNERINGER and
15 overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A
16 Private Professional Guardian, LLC that either did not benefit GLORIA SCHNERINGER or
17 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
18 do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank
19 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
20 not benefit GLORIA SCHNERINGER or did not occur, and/or directed Angelica Sanchez
21 and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy
22 to commit this crime, with the intent that the crime be committed.

23 COUNT 26 - EXPLOITATION OF AN OLDER PERSON

24 Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013
25 and September 3, 2015 willfully, unlawfully and feloniously exploit an older person having
26 been born in 1937, to wit: JANICE MITCHELL, by use of a guardianship converting JANICE
27 MITCHELL's money, assets or property, Defendants intending to permanently deprive
28 JANICE MITCHELL of the ownership, use, benefit or possession of her money, assets or

1 property having an value of more than \$650.00, by working in their role as guardian and
2 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
3 exploiting JANICE MITCHELL in the amount of approximately \$4,766.37. Defendants are
4 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
5 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
6 crime, with the intent that this crime be committed, by providing counsel and/or
7 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
8 guardian for JANICE MITCHELL and overcharged for ward visits, shopping trips, bank
9 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
10 not benefit JANICE MITCHELL or did not occur, and/or directed Angelica Sanchez and/or
11 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
12 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
13 Professional Guardian, LLC that either did not benefit JANICE MITCHELL or did not occur,
14 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
15 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
16 committed.

17 COUNT 27 - THEFT

18 Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013
19 and September 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use
20 the services or property of another person entrusted to them, or placed in their possession for
21 a limited, authorized period of determined or prescribed duration or for a limited use, having
22 a value of \$3,500.00 or more, belonging to JANICE MITCHELL and/or the ESTATE OF
23 JANICE MITCHELL, in the following manner, to wit: by working in their role as guardian
24 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
25 unlawfully converting money belonging to JANICE MITCHELL in the amount of
26 approximately \$4,766.37. Defendants are criminally liable under one or more of the following
27 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
28 aiding or abetting in the commission of this crime, with the intent that this crime be committed,

1 by providing counsel and/or encouragement and by entering into a course of conduct whereby
2 APRIL PARKS acted as guardian for JANICE MITCHELL and overcharged for ward visits,
3 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
4 LLC that either did not benefit JANICE MITCHELL or did not occur, and/or directed Angelica
5 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
6 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
7 of A Private Professional Guardian, LLC that either did not benefit JANICE MITCHELL or
8 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
9 do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
10 crime be committed.

11 COUNT 28 - EXPLOITATION OF AN OLDER PERSON

12 Defendants APRIL PARKS and MARK SIMMONS did on or between December 3,
13 2013 and December 8, 2014 willfully, unlawfully and feloniously exploit an older person
14 having been born in 1932, to wit: MARY VITEK, by use of a guardianship converting MARY
15 VITEK's money, assets or property, Defendants intending to permanently deprive MARY
16 VITEK of the ownership, use, benefit or possession of her money, assets or property having
17 an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling
18 for visits, shopping trips, court filings, and banking visits thereby exploiting MARY VITEK
19 in the amount of approximately \$2,705.39. Defendants are criminally liable under one or more
20 of the following principles of criminal liability, to wit: (1) by directly committing this crime;
21 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
22 be committed, by providing counsel and/or encouragement and by entering into a course of
23 conduct whereby APRIL PARKS acted as guardian for MARY VITEK and overcharged for
24 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
25 Professional Guardian, LLC that either did not benefit MARY VITEK or did not occur, and/or
26 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and
27 MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or
28 other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit

1 MARY VITEK or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
2 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
3 with the intent that the crime be committed.

4 COUNT 29 - THEFT

5 Defendants APRIL PARKS and MARK SIMMONS did on or between December 3,
6 2013 and December 8, 2014 willfully, knowingly, feloniously, and without lawful authority,
7 use the services or property of another person entrusted to them, or placed in their possession
8 for a limited, authorized period of determined or prescribed duration or for a limited use,
9 having a value of \$650.00 or more, belonging to MARY VITEK and/or the ESTATE OF
10 MARY VITEK, in the following manner, to wit: by working in their role as guardian and
11 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
12 unlawfully converting money belonging to MARY VITEK in the amount of approximately
13 \$2,705.39. Defendants are criminally liable under one or more of the following principles of
14 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting
15 in the commission of this crime, with the intent that this crime be committed, by providing
16 counsel and/or encouragement and by entering into a course of conduct whereby APRIL
17 PARKS acted as guardian for MARY VITEK and overcharged for ward visits, shopping trips,
18 bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either
19 did not benefit MARY VITEK or did not occur, and/or directed Angelica Sanchez and/or Heidi
20 Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same
21 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
22 Professional Guardian, LLC that either did not benefit MARY VITEK or did not occur, and/or
23 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3)
24 pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

25 COUNT 30 - EXPLOITATION OF AN OLDER PERSON

26 Defendants APRIL PARKS and MARK SIMMONS did on or between July 5, 2013
27 and February 3, 2015 willfully, unlawfully and feloniously exploit an older person having been
28 born in 1921, to wit: CLYDE BOWMAN, by use of a guardianship converting CLYDE

1 BOWMAN's money, assets or property, Defendants intending to permanently deprive
2 CLYDE BOWMAN of the ownership, use, benefit or possession of his money, assets or
3 property having an value of more than \$650.00, by working in their role as guardian and
4 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
5 exploiting CLYDE BOWMAN in the amount of approximately \$3,820.14. Defendants are
6 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
7 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
8 crime, with the intent that this crime be committed, by providing counsel and/or
9 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
10 guardian for CLYDE BOWMAN and overcharged for ward visits, shopping trips, bank
11 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
12 not benefit CLYDE BOWMAN or did not occur, and/or directed Angelica Sanchez and/or
13 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
14 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
15 Professional Guardian, LLC that either did not benefit CLYDE BOWMAN or did not occur,
16 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
17 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
18 committed.

19 COUNT 31 - THEFT

20 Defendants APRIL PARKS and MARK SIMMONS did on or between July 5, 2013
21 and February 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
22 services or property of another person entrusted to them, or placed in their possession for a
23 limited, authorized period of determined or prescribed duration or for a limited use, having a
24 value of \$3,500.00 or more, belonging to CLYDE BOWMAN and/or the ESTATE OF
25 CLYDE BOWMAN, in the following manner, to wit: by working in their role as guardian and
26 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
27 unlawfully converting money belonging to CLYDE BOWMAN in the amount of
28 approximately \$3,820.14. Defendants are criminally liable under one or more of the following

1 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
2 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
3 by providing counsel and/or encouragement and by entering into a course of conduct whereby
4 APRIL PARKS acted as guardian for CLYDE BOWMAN and overcharged for ward visits,
5 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
6 LLC that either did not benefit CLYDE BOWMAN or did not occur, and/or directed Angelica
7 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
8 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
9 of A Private Professional Guardian, LLC that either did not benefit CLYDE BOWMAN or did
10 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do
11 the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
12 crime be committed.

13 COUNT 32 - EXPLOITATION OF AN OLDER PERSON

14 Defendants APRIL PARKS and MARK SIMMONS did on or between July 5, 2013
15 and July 3, 2015 willfully, unlawfully and feloniously exploit an older person having been
16 born in 1925, to wit: ROY FRANKLIN, by use of a guardianship converting ROY
17 FRANKLIN's money, assets or property, Defendants intending to permanently deprive ROY
18 FRANKLIN of the ownership, use, benefit or possession of his money, assets or property
19 having an value of more than \$5,000.00, by working in their role as guardian and fiduciary,
20 overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting ROY
21 FRANKLIN in the amount of approximately \$5,806.97. Defendants are criminally liable
22 under one or more of the following principles of criminal liability, to wit: (1) by directly
23 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
24 the intent that this crime be committed, by providing counsel and/or encouragement and by
25 entering into a course of conduct whereby APRIL PARKS acted as guardian for ROY
26 FRANKLIN and overcharged for ward visits, shopping trips, bank deposits, and/or other tasks
27 on behalf of A Private Professional Guardian, LLC that either did not benefit ROY
28 FRANKLIN or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or

1 Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits,
2 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
3 LLC that either did not benefit ROY FRANKLIN or did not occur, and/or directed Angelica
4 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a
5 conspiracy to commit this crime, with the intent that the crime be committed.

6 COUNT 33 - THEFT

7 Defendants APRIL PARKS and MARK SIMMONS did on or between July 5, 2013
8 and July 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
9 services or property of another person entrusted to them, or placed in their possession for a
10 limited, authorized period of determined or prescribed duration or for a limited use, having a
11 value of \$3,500.00 or more, belonging to ROY FRANKLIN and/or the ESTATE OF ROY
12 FRANKLIN, in the following manner, to wit: by working in their role as guardian and
13 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
14 unlawfully converting money belonging to ROY FRANKLIN in the amount of approximately
15 \$5,806.97. Defendants are criminally liable under one or more of the following principles of
16 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting
17 in the commission of this crime, with the intent that this crime be committed, by providing
18 counsel and/or encouragement and by entering into a course of conduct whereby APRIL
19 PARKS acted as guardian for ROY FRANKLIN and overcharged for ward visits, shopping
20 trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that
21 either did not benefit ROY FRANKLIN or did not occur, and/or directed Angelica Sanchez
22 and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
23 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
24 of A Private Professional Guardian, LLC that either did not benefit ROY FRANKLIN or did
25 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do
26 the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
27 crime be committed.

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1 COUNT 34 - EXPLOITATION OF AN OLDER PERSON

2 Defendants APRIL PARKS and MARK SIMMONS did on or between December 3,
3 2013 and November 4, 2015 willfully, unlawfully and feloniously exploit an older person
4 having been born in 1929, to wit: JUANITA GRAHAM, by use of a guardianship converting
5 JUANITA GRAHAM's money, assets or property, Defendants intending to permanently
6 deprive JUANITA GRAHAM of the ownership, use, benefit or possession of her money,
7 assets or property having an value of more than \$5,000.00, by working in their role as guardian
8 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
9 exploiting JUANITA GRAHAM in the amount of approximately \$5,766.75. Defendants are
10 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
11 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
12 crime, with the intent that this crime be committed, by providing counsel and/or
13 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
14 guardian for JUANITA GRAHAM and overcharged for ward visits, shopping trips, bank
15 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
16 not benefit JUANITA GRAHAM or did not occur, and/or directed Angelica Sanchez and/or
17 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
18 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
19 Professional Guardian, LLC that either did not benefit JUANITA GRAHAM or did not occur,
20 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
21 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
22 committed.

23 COUNT 35 - THEFT

24 Defendants APRIL PARKS and MARK SIMMONS did on or between December 3,
25 2013 and November 4, 2015 willfully, knowingly, feloniously, and without lawful authority,
26 use the services or property of another person entrusted to them, or placed in their possession
27 for a limited, authorized period of determined or prescribed duration or for a limited use,
28 having a value of \$3,500.00 or more, belonging to JUANITA GRAHAM and/or the ESTATE

1 OF JUANITA GRAHAM, in the following manner, to wit: by working in their role as guardian
2 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
3 unlawfully converting money belonging to JUANITA GRAHAM in the amount of
4 approximately \$5,766.75. Defendants are criminally liable under one or more of the following
5 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
6 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
7 by providing counsel and/or encouragement and by entering into a course of conduct whereby
8 APRIL PARKS acted as guardian for JUANITA GRAHAM and overcharged for ward visits,
9 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
10 LLC that either did not benefit JUANITA GRAHAM or did not occur, and/or directed
11 Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK
12 SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other
13 tasks on behalf of A Private Professional Guardian, LLC that either did not benefit JUANITA
14 GRAHAM or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or
15 Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the
16 intent that the crime be committed.

17 COUNT 36 - EXPLOITATION OF AN OLDER PERSON

18 Defendants APRIL PARKS and MARK SIMMONS did on or between July 3, 2014
19 and May 4, 2015 willfully, unlawfully and feloniously exploit an older person having been
20 born in 1935, to wit: YOSHIKO KINDAICHI, by use of a guardianship converting
21 YOSHIKO KINDAICHI's money, assets or property, Defendants intending to permanently
22 deprive YOSHIKO KINDAICHI of the ownership, use, benefit or possession of her money,
23 assets or property having an value of more than \$650.00, by working in their role as guardian
24 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
25 exploiting YOSHIKO KINDAICHI in the amount of approximately \$3,699.28. Defendants
26 are criminally liable under one or more of the following principles of criminal liability, to wit:
27 (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of
28 this crime, with the intent that this crime be committed, by providing counsel and/or

1 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
2 guardian for YOSHIKO KINDAICHI and overcharged for ward visits, shopping trips, bank
3 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
4 not benefit YOSHIKO KINDAICHI or did not occur, and/or directed Angelica Sanchez and/or
5 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
6 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
7 Professional Guardian, LLC that either did not benefit YOSHIKO KINDAICHI or did not
8 occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the
9 same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime
10 be committed.

11 COUNT 37 - THEFT

12 Defendants APRIL PARKS and MARK SIMMONS did on or between July 3, 2014
13 and May 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
14 services or property of another person entrusted to them, or placed in their possession for a
15 limited, authorized period of determined or prescribed duration or for a limited use, having a
16 value of \$3,500.00 or more, belonging to YOSHIKO KINDAICHI and/or the ESTATE OF
17 YOSHIKO KINDAICHI, in the following manner, to wit: by working in their role as guardian
18 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
19 unlawfully converting money belonging to YOSHIKO KINDAICHI in the amount of
20 approximately \$3,699.28. Defendants are criminally liable under one or more of the following
21 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
22 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
23 by providing counsel and/or encouragement and by entering into a course of conduct whereby
24 APRIL PARKS acted as guardian for YOSHIKO KINDAICHI and overcharged for ward
25 visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional
26 Guardian, LLC that either did not benefit YOSHIKO KINDAICHI or did not occur, and/or
27 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and
28 MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or

1 other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
2 YOSHIKO KINDAICHI or did not occur, and/or directed Angelica Sanchez and/or Heidi
3 Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this
4 crime, with the intent that the crime be committed.

5 COUNT 38 - EXPLOITATION OF AN OLDER PERSON

6 Defendants APRIL PARKS and MARK SIMMONS did on or between July 4, 2013
7 and June 5, 2015 willfully, unlawfully and feloniously exploit an older person having been
8 born in 1934, to wit: WALTER WRIGHT, by use of a guardianship converting WALTER
9 WRIGHT's money, assets or property, Defendants intending to permanently deprive
10 WALTER WRIGHT of the ownership, use, benefit or possession of his money, assets or
11 property having an value of more than \$650.00, by working in their role as guardian and
12 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
13 exploiting WALTER WRIGHT in the amount of approximately \$4,183.08. Defendants are
14 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
15 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
16 crime, with the intent that this crime be committed, by providing counsel and/or
17 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
18 guardian for WALTER WRIGHT and overcharged for ward visits, shopping trips, bank
19 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
20 not benefit WALTER WRIGHT or did not occur, and/or directed Angelica Sanchez and/or
21 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
22 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
23 Professional Guardian, LLC that either did not benefit WALTER WRIGHT or did not occur,
24 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
25 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
26 committed.

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1 COUNT 39 - THEFT

2 Defendants APRIL PARKS and MARK SIMMONS did on or between July 4, 2013
3 and June 5, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
4 services or property of another person entrusted to them, or placed in their possession for a
5 limited, authorized period of determined or prescribed duration or for a limited use, having a
6 value of \$3,500.00 or more, belonging to WALTER WRIGHT and/or the ESTATE OF
7 WALTER WRIGHT, in the following manner, to wit: by working in their role as guardian and
8 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
9 unlawfully converting money belonging to WALTER WRIGHT in the amount of
10 approximately \$4,183.08. Defendants are criminally liable under one or more of the following
11 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
12 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
13 by providing counsel and/or encouragement and by entering into a course of conduct whereby
14 APRIL PARKS acted as guardian for WALTER WRIGHT and overcharged for ward visits,
15 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
16 LLC that either did not benefit WALTER WRIGHT or did not occur, and/or directed Angelica
17 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
18 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
19 of A Private Professional Guardian, LLC that either did not benefit WALTER WRIGHT or
20 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
21 do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
22 crime be committed.

23 COUNT 40 - EXPLOITATION OF AN OLDER PERSON

24 Defendants APRIL PARKS and MARK SIMMONS did on or between March 5, 2014
25 and June 4, 2015 willfully, unlawfully and feloniously exploit an older person having been
26 born in 1932, to wit: DELORES SMITH, by use of a guardianship converting DELORES
27 SMITH's money, assets or property, Defendants intending to permanently deprive DELORES
28 SMITH of the ownership, use, benefit or possession of her money, assets or property having

1 an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling
2 for visits, shopping trips, court filings, and banking visits thereby exploiting DELORES
3 SMITH in the amount of approximately \$6,166.30. Defendants are criminally liable under
4 one or more of the following principles of criminal liability, to wit: (1) by directly committing
5 this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that
6 this crime be committed, by providing counsel and/or encouragement and by entering into a
7 course of conduct whereby APRIL PARKS acted as guardian for DELORES SMITH and
8 overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A
9 Private Professional Guardian, LLC that either did not benefit DELORES SMITH or did not
10 occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the
11 same; and MARK SIMMONS documented the same ward visits, shopping trips, bank
12 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
13 not benefit DELORES SMITH or did not occur, and/or directed Angelica Sanchez and/or
14 Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to
15 commit this crime, with the intent that the crime be committed.

16 COUNT 41 - THEFT

17 Defendants APRIL PARKS and MARK SIMMONS did on or between March 5, 2014
18 and June 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
19 services or property of another person entrusted to them, or placed in their possession for a
20 limited, authorized period of determined or prescribed duration or for a limited use, having a
21 value of \$3,500.00 or more, belonging to DELORES SMITH and/or the ESTATE OF
22 DELORES SMITH, in the following manner, to wit: by working in their role as guardian and
23 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
24 unlawfully converting money belonging to DELORES SMITH in the amount of
25 approximately \$6,166.30. Defendants are criminally liable under one or more of the following
26 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
27 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
28 by providing counsel and/or encouragement and by entering into a course of conduct whereby

1 APRIL PARKS acted as guardian for DELORES SMITH and overcharged for ward visits,
2 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
3 LLC that either did not benefit DELORES SMITH or did not occur, and/or directed Angelica
4 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
5 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
6 of A Private Professional Guardian, LLC that either did not benefit DELORES SMITH or did
7 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do
8 the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
9 crime be committed.

10 COUNT 42 - EXPLOITATION OF AN OLDER PERSON

11 Defendants APRIL PARKS and MARK SIMMONS did on or between August 3, 2012
12 and December 17, 2015 willfully, unlawfully and feloniously exploit an older person having
13 been born in 1939, to wit: MARLENE HOMER, by use of a guardianship converting
14 MARLENE HOMER's money, assets or property, Defendants intending to permanently
15 deprive MARLENE HOMER of the ownership, use, benefit or possession of her money, assets
16 or property having an value of more than \$5,000.00, by working in their role as guardian and
17 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
18 exploiting MARLENE HOMER in the amount of approximately \$11,582.40. Defendants are
19 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
20 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
21 crime, with the intent that this crime be committed, by providing counsel and/or
22 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
23 guardian for MARLENE HOMER and overcharged for ward visits, shopping trips, bank
24 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
25 not benefit MARLENE HOMER or did not occur, and/or directed Angelica Sanchez and/or
26 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
27 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
28 Professional Guardian, LLC that either did not benefit MARLENE HOMER or did not occur,

1 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
2 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
3 committed.

4 COUNT 43 - THEFT

5 Defendants APRIL PARKS and MARK SIMMONS did on or between August 3, 2012
6 and December 17, 2015 willfully, knowingly, feloniously, and without lawful authority, use
7 the services or property of another person entrusted to them, or placed in their possession for
8 a limited, authorized period of determined or prescribed duration or for a limited use, having
9 a value of \$3,500.00 or more, belonging to MARLENE HOMER and/or the ESTATE OF
10 MARLENE HOMER, in the following manner, to wit: by working in their role as guardian
11 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
12 unlawfully converting money belonging to MARLENE HOMER in the amount of
13 approximately \$11,582.40 Defendants are criminally liable under one or more of the following
14 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
15 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
16 by providing counsel and/or encouragement and by entering into a course of conduct whereby
17 APRIL PARKS acted as guardian for MARLENE HOMER and overcharged for ward visits,
18 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
19 LLC that either did not benefit MARLENE HOMER or did not occur, and/or directed Angelica
20 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
21 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
22 of A Private Professional Guardian, LLC that either did not benefit MARLENE HOMER or
23 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
24 do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
25 crime be committed.

26 COUNT 44 - EXPLOITATION OF AN OLDER PERSON

27 Defendants APRIL PARKS and MARK SIMMONS did on or between August 3, 2012
28 and March 4, 2015 willfully, unlawfully and feloniously exploit an older person having been

1 born in 1919, to wit: MARIE LONG, by use of a guardianship converting MARIE LONG's
2 money, assets or property, Defendants intending to permanently deprive MARIE LONG of
3 the ownership, use, benefit or possession of her money, assets or property having an value of
4 more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits,
5 shopping trips, court filings, and banking visits thereby exploiting MARIE LONG in the
6 amount of approximately \$10,708.45. Defendants are criminally liable under one or more of
7 the following principles of criminal liability, to wit: (1) by directly committing this crime;
8 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
9 be committed, by providing counsel and/or encouragement and by entering into a course of
10 conduct whereby APRIL PARKS acted as guardian for MARIE LONG and overcharged for
11 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
12 Professional Guardian, LLC that either did not benefit MARIE LONG or did not occur, and/or
13 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and
14 MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or
15 other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
16 MARIE LONG or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
17 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
18 with the intent that the crime be committed.

19 COUNT 45 - THEFT

20 Defendants APRIL PARKS and MARK SIMMONS did on or between August 3, 2012
21 and March 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
22 services or property of another person entrusted to them, or placed in their possession for a
23 limited, authorized period of determined or prescribed duration or for a limited use, having a
24 value of \$3,500.00 or more, belonging to MARIE LONG and/or the ESTATE OF MARIE
25 LONG, in the following manner, to wit: by working in their role as guardian and fiduciary,
26 overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully
27 converting money belonging to MARIE LONG in the amount of approximately \$10,708.45.
28 Defendants are criminally liable under one or more of the following principles of criminal

1 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
2 commission of this crime, with the intent that this crime be committed, by providing counsel
3 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
4 as guardian for MARIE LONG and overcharged for ward visits, shopping trips, bank deposits,
5 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
6 MARIE LONG or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
7 and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits,
8 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
9 LLC that either did not benefit MARIE LONG or did not occur, and/or directed Angelica
10 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a
11 conspiracy to commit this crime, with the intent that the crime be committed.

12 COUNT 46 - EXPLOITATION OF AN OLDER PERSON

13 Defendants APRIL PARKS and MARK SIMMONS did on or between September 19,
14 2013 and July 3, 2014 willfully, unlawfully and feloniously exploit an older person having
15 been born in 1936, to wit: RUDY NORTH, by use of a guardianship converting RUDY
16 NORTH's money, assets or property, Defendants intending to permanently deprive RUDY
17 NORTH of the ownership, use, benefit or possession of his money, assets or property having
18 an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling
19 for visits, shopping trips, court filings, and banking visits thereby exploiting RUDY NORTH
20 in the amount of approximately \$1,449.30. Defendants are criminally liable under one or more
21 of the following principles of criminal liability, to wit: (1) by directly committing this crime;
22 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
23 be committed, by providing counsel and/or encouragement and by entering into a course of
24 conduct whereby APRIL PARKS acted as guardian for RUDY NORTH and overcharged for
25 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
26 Professional Guardian, LLC that either did not benefit RUDY NORTH or did not occur, and/or
27 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and
28 MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or

1 other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
2 RUDY NORTH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
3 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
4 with the intent that the crime be committed.

5 COUNT 47 - THEFT

6 Defendants APRIL PARKS and MARK SIMMONS did on or between September 19,
7 2013 and July 3, 2014 willfully, knowingly, feloniously, and without lawful authority, use the
8 services or property of another person entrusted to them, or placed in their possession for a
9 limited, authorized period of determined or prescribed duration or for a limited use, having a
10 value of \$650.00 or more, belonging to RUDY NORTH and/or the ESTATE OF RUDY
11 NORTH, in the following manner, to wit: by working in their role as guardian and fiduciary,
12 overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully
13 converting money belonging to RUDY NORTH in the amount of approximately \$1,449.30.
14 Defendants are criminally liable under one or more of the following principles of criminal
15 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
16 commission of this crime, with the intent that this crime be committed, by providing counsel
17 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
18 as guardian for RUDY NORTH and overcharged for ward visits, shopping trips, bank deposits,
19 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
20 RUDY NORTH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
21 and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits,
22 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
23 LLC that either did not benefit RUDY NORTH or did not occur, and/or directed Angelica
24 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a
25 conspiracy to commit this crime, with the intent that the crime be committed.

26 COUNT 48 - EXPLOITATION OF AN OLDER PERSON

27 Defendants APRIL PARKS and MARK SIMMONS did on or between October 4, 2013
28 and May 5, 2014 willfully, unlawfully and feloniously exploit an older person having been

1 born in 1938, to wit: RENNIE NORTH, by use of a guardianship converting RENNIE
2 NORTH's money, assets or property, Defendants intending to permanently deprive RENNIE
3 NORTH of the ownership, use, benefit or possession of her money, assets or property having
4 an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling
5 for visits, shopping trips, court filings, and banking visits thereby exploiting RENNIE NORTH
6 in the amount of approximately \$1,449.30. Defendants are criminally liable under one or more
7 of the following principles of criminal liability, to wit: (1) by directly committing this crime;
8 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
9 be committed, by providing counsel and/or encouragement and by entering into a course of
10 conduct whereby APRIL PARKS acted as guardian for RENNIE NORTH and overcharged
11 for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
12 Professional Guardian, LLC that either did not benefit RENNIE NORTH or did not occur,
13 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
14 and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits,
15 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
16 RENNIE NORTH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
17 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
18 with the intent that the crime be committed.

19 COUNT 49 - THEFT

20 Defendants APRIL PARKS and MARK SIMMONS did on or between October 4, 2013
21 and May 5, 2014 willfully, knowingly, feloniously, and without lawful authority, use the
22 services or property of another person entrusted to them, or placed in their possession for a
23 limited, authorized period of determined or prescribed duration or for a limited use, having a
24 value of \$650.00 or more, belonging to RENNIE NORTH and/or the ESTATE OF RENNIE
25 NORTH, in the following manner, to wit: by working in their role as guardian and fiduciary,
26 overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully
27 converting money belonging to RENNIE NORTH in the amount of approximately \$1,449.30.
28 Defendants are criminally liable under one or more of the following principles of criminal

1 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
2 commission of this crime, with the intent that this crime be committed, by providing counsel
3 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
4 as guardian for RENNIE NORTH and overcharged for ward visits, shopping trips, bank
5 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
6 not benefit RENNIE NORTH or did not occur, and/or directed Angelica Sanchez and/or Heidi
7 Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same
8 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
9 Professional Guardian, LLC that either did not benefit RENNIE NORTH or did not occur,
10 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
11 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
12 committed.

13 COUNT 50 - EXPLOITATION OF AN OLDER PERSON

14 Defendants APRIL PARKS and MARK SIMMONS did on or between September 3,
15 2013 and August 3, 2015 willfully, unlawfully and feloniously exploit an older person having
16 been born in 1927, to wit: HAROLD LOCKWOOD, by use of a guardianship converting
17 HAROLD LOCKWOOD's money, assets or property, Defendants intending to permanently
18 deprive HAROLD LOCKWOOD of the ownership, use, benefit or possession of his money,
19 assets or property having an value of more than \$650.00, by working in their role as guardian
20 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
21 exploiting HAROLD LOCKWOOD in the amount of approximately \$4,528.00. Defendants
22 are criminally liable under one or more of the following principles of criminal liability, to wit:
23 (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of
24 this crime, with the intent that this crime be committed, by providing counsel and/or
25 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
26 guardian for HAROLD LOCKWOOD and overcharged for ward visits, shopping trips, bank
27 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
28 not benefit HAROLD LOCKWOOD or did not occur, and/or directed Angelica Sanchez

1 and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
2 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
3 of A Private Professional Guardian, LLC that either did not benefit HAROLD LOCKWOOD
4 or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson
5 to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that
6 the crime be committed.

7 COUNT 51 - THEFT

8 Defendants APRIL PARKS and MARK SIMMONS did on or between September 3,
9 2013 and August 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use
10 the services or property of another person entrusted to them, or placed in their possession for
11 a limited, authorized period of determined or prescribed duration or for a limited use, having
12 a value of \$3,500.00 or more, belonging to HAROLD LOCKWOOD and/or the ESTATE OF
13 HAROLD LOCKWOOD, in the following manner, to wit: by working in their role as guardian
14 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
15 unlawfully converting money belonging to HAROLD LOCKWOOD in the amount of
16 approximately \$4,528.00. Defendants are criminally liable under one or more of the following
17 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
18 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
19 by providing counsel and/or encouragement and by entering into a course of conduct whereby
20 APRIL PARKS acted as guardian for HAROLD LOCKWOOD and overcharged for ward
21 visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional
22 Guardian, LLC that either did not benefit HAROLD LOCKWOOD or did not occur, and/or
23 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and
24 MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or
25 other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
26 HAROLD LOCKWOOD or did not occur, and/or directed Angelica Sanchez and/or Heidi
27 Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this
28 crime, with the intent that the crime be committed.

1 COUNT 52 - EXPLOITATION OF AN OLDER PERSON

2 Defendants APRIL PARKS and MARK SIMMONS did on or between May 24, 2013
3 and January 5, 2015 willfully, unlawfully and feloniously exploit an older person having been
4 born in 1932, to wit: NORBERT WILKENING, by use of a guardianship converting
5 NORBERT WILKENING's money, assets or property, Defendants intending to permanently
6 deprive NORBERT WILKENING of the ownership, use, benefit or possession of his money,
7 assets or property having an value of more than \$650.00, by working in their role as guardian
8 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
9 exploiting NORBERT WILKENING in the amount of approximately \$4,533.20. Defendants
10 are criminally liable under one or more of the following principles of criminal liability, to wit:
11 (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of
12 this crime, with the intent that this crime be committed, by providing counsel and/or
13 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
14 guardian for NORBERT WILKENING and overcharged for ward visits, shopping trips, bank
15 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
16 not benefit NORBERT WILKENING or did not occur, and/or directed Angelica Sanchez
17 and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
18 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
19 of A Private Professional Guardian, LLC that either did not benefit NORBERT WILKENING
20 or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson
21 to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that
22 the crime be committed.

23 COUNT 53 - THEFT

24 Defendants APRIL PARKS and MARK SIMMONS did on or between May 24, 2013
25 and January 5, 2015 willfully, knowingly, feloniously, and without lawful authority, use the
26 services or property of another person entrusted to them, or placed in their possession for a
27 limited, authorized period of determined or prescribed duration or for a limited use, having a
28 value of \$3,500.00 or more, belonging to NORBERT WILKENING and/or the ESTATE OF

1 NORBERT WILKENING, in the following manner, to wit: by working in their role as
2 guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits
3 thereby unlawfully converting money belonging to NORBERT WILKENING in the amount
4 of approximately \$4,533.20. Defendants are criminally liable under one or more of the
5 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
6 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
7 committed, by providing counsel and/or encouragement and by entering into a course of
8 conduct whereby APRIL PARKS acted as guardian for NORBERT WILKENING and
9 overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A
10 Private Professional Guardian, LLC that either did not benefit NORBERT WILKENING or
11 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
12 do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank
13 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
14 not benefit NORBERT WILKENING or did not occur, and/or directed Angelica Sanchez
15 and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy
16 to commit this crime, with the intent that the crime be committed.

17 COUNT 54 - EXPLOITATION OF AN OLDER PERSON

18 Defendants APRIL PARKS and MARK SIMMONS did on or between June 5, 2013
19 and November 4, 2013 willfully, unlawfully and feloniously exploit an older person having
20 been born in 1941, to wit: ADOLFO GONZALEZ, by use of a guardianship converting
21 ADOLFO GONZALEZ's money, assets or property, Defendants intending to permanently
22 deprive ADOLFO GONZALEZ of the ownership, use, benefit or possession of his money,
23 assets or property having an value of more than \$650.00, by working in their role as guardian
24 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
25 exploiting ADOLFO GONZALEZ in the amount of approximately \$1,413.60. Defendants are
26 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
27 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
28 crime, with the intent that this crime be committed, by providing counsel and/or

1 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
2 guardian for ADOLFO GONZALEZ and overcharged for ward visits, shopping trips, bank
3 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
4 not benefit ADOLFO GONZALEZ or did not occur, and/or directed Angelica Sanchez and/or
5 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
6 same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
7 Professional Guardian, LLC that either did not benefit ADOLFO GONZALEZ or did not
8 occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the
9 same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime
10 be committed.

11 **COUNT 55 - THEFT**

12 Defendants APRIL PARKS and MARK SIMMONS did on or between June 5, 2013
13 and November 4, 2013 willfully, knowingly, feloniously, and without lawful authority, use the
14 services or property of another person entrusted to them, or placed in their possession for a
15 limited, authorized period of determined or prescribed duration or for a limited use, having a
16 value of \$3,500.00 or more, belonging to ADOLFO GONZALEZ and/or the ESTATE OF
17 ADOLFO GONZALEZ, in the following manner, to wit: by working in their role as guardian
18 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
19 unlawfully converting money belonging to ADOLFO GONZALEZ in the amount of
20 approximately \$1,413.60. Defendants are criminally liable under one or more of the following
21 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
22 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
23 by providing counsel and/or encouragement and by entering into a course of conduct whereby
24 APRIL PARKS acted as guardian for ADOLFO GONZALEZ and overcharged for ward visits,
25 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
26 LLC that either did not benefit ADOLFO GONZALEZ or did not occur, and/or directed
27 Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK
28 SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other

1 tasks on behalf of A Private Professional Guardian, LLC that either did not benefit ADOLFO
2 GONZALEZ or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or
3 Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the
4 intent that the crime be committed.

5 COUNT 56 - EXPLOITATION OF A VULNERABLE PERSON

6 Defendants APRIL PARKS and MARK SIMMONS did on or between August 6, 2013
7 and August 3, 2015 willfully, unlawfully and feloniously exploit a vulnerable person having,
8 to wit: LINDA PHILLIPS, by use of a guardianship converting LINDA PHILLIPS's money,
9 assets or property, Defendants intending to permanently deprive LINDA PHILLIPS of the
10 ownership, use, benefit or possession of his money, assets or property having an value of more
11 than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits,
12 shopping trips, court filings, and banking visits thereby exploiting LINDA PHILLIPS in the
13 amount of approximately \$3,445.26. Defendants are criminally liable under one or more of
14 the following principles of criminal liability, to wit: (1) by directly committing this crime;
15 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
16 be committed, by providing counsel and/or encouragement and by entering into a course of
17 conduct whereby APRIL PARKS acted as guardian for LINDA PHILLIPS and overcharged
18 for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
19 Professional Guardian, LLC that either did not benefit LINDA PHILLIPS or did not occur,
20 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
21 and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits,
22 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
23 LINDA PHILLIPS or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
24 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
25 with the intent that the crime be committed.

26 COUNT 57 - THEFT

27 Defendants APRIL PARKS and MARK SIMMONS did on or between August 6, 2013
28 and August 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the

1 services or property of another person entrusted to them, or placed in their possession for a
2 limited, authorized period of determined or prescribed duration or for a limited use, having a
3 value of \$3,500.00 or more, belonging to LINDA PHILLIPS and/or the ESTATE OF LINDA
4 PHILLIPS, in the following manner, to wit: by working in their role as guardian and fiduciary,
5 overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully
6 converting money belonging to LINDA PHILLIPS in the amount of approximately \$3,445.26.
7 Defendants are criminally liable under one or more of the following principles of criminal
8 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
9 commission of this crime, with the intent that this crime be committed, by providing counsel
10 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
11 as guardian for LINDA PHILLIPS and overcharged for ward visits, shopping trips, bank
12 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
13 not benefit LINDA PHILLIPS or did not occur, and/or directed Angelica Sanchez and/or Heidi
14 Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same
15 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
16 Professional Guardian, LLC that either did not benefit LINDA PHILLIPS or did not occur,
17 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
18 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
19 committed.

20 COUNT 58 - EXPLOITATION OF AN OLDER PERSON

21 Defendants APRIL PARKS and MARK SIMMONS did on or between March 3, 2012
22 and November 30, 2015, willfully, unlawfully and feloniously exploit an older person having
23 been born in 1941, to wit: NORMAN WEINSTOCK, by use of a guardianship converting
24 NORMAN WEINSTOCK's money, assets or property, Defendants intending to permanently
25 deprive NORMAN WEINSTOCK of the ownership, use, benefit or possession of his money,
26 assets or property having an value of more than \$5,000.00, by working in their role as guardian
27 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
28 exploiting NORMAN WEINSTOCK in the amount of approximately \$15,068.18. Defendants

1 are criminally liable under one or more of the following principles of criminal liability, to wit:
2 (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of
3 this crime, with the intent that this crime be committed, by providing counsel and/or
4 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
5 guardian for NORMAN WEINSTOCK and overcharged for ward visits, shopping trips, bank
6 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
7 not benefit NORMAN WEINSTOCK or did not occur, and/or directed Angelica Sanchez
8 and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
9 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
10 of A Private Professional Guardian, LLC that either did not benefit NORMAN WEINSTOCK
11 or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson
12 to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that
13 the crime be committed.

14 COUNT 59 - THEFT

15 Defendants APRIL PARKS and MARK SIMMONS did on or between March 3, 2012
16 and November 30, 2015, willfully, knowingly, feloniously, and without lawful authority, use
17 the services or property of another person entrusted to them, or placed in their possession for
18 a limited, authorized period of determined or prescribed duration or for a limited use, having
19 a value of \$3,500.00 or more, belonging to NORMAN WEINSTOCK and/or the ESTATE OF
20 NORMAN WEINSTOCK, in the following manner, to wit: by working in their role as
21 guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits
22 thereby unlawfully converting money belonging to NORMAN WEINSTOCK in the amount
23 of approximately \$15,068.18. Defendants are criminally liable under one or more of the
24 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
25 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
26 committed, by providing counsel and/or encouragement and by entering into a course of
27 conduct whereby APRIL PARKS acted as guardian for NORMAN WEINSTOCK and
28 overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A

1 Private Professional Guardian, LLC that either did not benefit NORMAN WEINSTOCK or
2 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
3 do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank
4 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
5 not benefit NORMAN WEINSTOCK or did not occur, and/or directed Angelica Sanchez
6 and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy
7 to commit this crime, with the intent that the crime be committed.

8 COUNT 60 - EXPLOITATION OF AN OLDER PERSON

9 Defendants APRIL PARKS and MARK SIMMONS did on or between January 1, 2011
10 and December 31, 2015, willfully, unlawfully and feloniously exploit an older person having
11 been born in 1927, to wit: MARIA COOPER, by use of a guardianship converting MARIA
12 COOPER's money, assets or property, Defendants intending to permanently deprive MARIA
13 COOPER of the ownership, use, benefit or possession of her money, assets or property having
14 an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling
15 for visits, shopping trips, court filings, and banking visits thereby exploiting MARIA
16 COOPER in the amount of approximately \$6,920.00. Defendants are criminally liable under
17 one or more of the following principles of criminal liability, to wit: (1) by directly committing
18 this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that
19 this crime be committed, by providing counsel and/or encouragement and by entering into a
20 course of conduct whereby APRIL PARKS acted as guardian for MARIA COOPER and
21 overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A
22 Private Professional Guardian, LLC that either did not benefit MARIA COOPER or did not
23 occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the
24 same; and MARK SIMMONS documented the same ward visits, shopping trips, bank
25 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
26 not benefit MARIA COOPER or did not occur, and/or directed Angelica Sanchez and/or Heidi
27 Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this
28 crime, with the intent that the crime be committed.

1 COUNT 61 - THEFT

2 Defendants APRIL PARKS and MARK SIMMONS did on or between January 1, 2011
3 and December 31, 2015, willfully, knowingly, feloniously, and without lawful authority, use
4 the services or property of another person entrusted to them, or placed in their possession for
5 a limited, authorized period of determined or prescribed duration or for a limited use, having
6 a value of \$3,500.00 or more, belonging to MARIA COOPER and/or the ESTATE OF MARIA
7 COOPER, in the following manner, to wit: by working in their role as guardian and fiduciary,
8 overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully
9 converting money belonging to MARIA COOPER in the amount of approximately \$6,920.00.
10 Defendants are criminally liable under one or more of the following principles of criminal
11 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
12 commission of this crime, with the intent that this crime be committed, by providing counsel
13 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
14 as guardian for MARIA COOPER and overcharged for ward visits, shopping trips, bank
15 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
16 not benefit MARIA COOPER or did not occur, and/or directed Angelica Sanchez and/or Heidi
17 Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same
18 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
19 Professional Guardian, LLC that either did not benefit MARIA COOPER or did not occur,
20 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
21 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
22 committed.

23 COUNT 62 - EXPLOITATION OF AN OLDER PERSON

24 Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR did on
25 or between July 5, 2013 and May 4, 2015, willfully, unlawfully and feloniously exploit an
26 older person having been born in 1939, to wit: KENNETH CHRISTOPHERSON, by use of
27 a guardianship converting KENNETH CHRISTOPHERSON's money, assets or property,
28 Defendants intending to permanently deprive KENNETH CHRISTOPHERSON of the

1 ownership, use, benefit or possession of his money, assets or property having an value of more
2 than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits,
3 shopping trips, court filings, and banking visits thereby exploiting KENNETH
4 CHRISTOPHERSON in the amount of approximately \$4,290.00. Defendants are criminally
5 liable under one or more of the following principles of criminal liability, to wit: (1) by directly
6 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
7 the intent that this crime be committed, by providing counsel and/or encouragement and by
8 entering into a course of conduct whereby APRIL PARKS acted as guardian for KENNETH
9 CHRISTOPHERSON and overcharged for ward visits, shopping trips, bank deposits, house
10 checks, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
11 not benefit KENNETH CHRISTOPHERSON or did not occur, and/or directed Angelica
12 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
13 documented the same ward visits, shopping trips, bank deposits, house checks, and/or other
14 tasks on behalf of A Private Professional Guardian, LLC that either did not benefit KENNETH
15 CHRISTOPHERSON or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
16 and/or Sue Pehrson to do the same; and GARY NEAL TAYLOR conducted unnecessary
17 services and/or overbilled for services on behalf of A Private Professional Guardian, LLC;
18 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
19 committed.

20 COUNT 63 - THEFT

21 Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR did on
22 or between July 5, 2013, and May 4, 2015, willfully, knowingly, feloniously, and without
23 lawful authority, use the services or property of another person entrusted to them, or placed in
24 their possession for a limited, authorized period of determined or prescribed duration or for a
25 limited use, having a value of \$3,500.00 or more, belonging to KENNETH
26 CHRISTOPHERSON and/or the ESTATE OF KENNETH CHRISTOPHERSON, in the
27 following manner, to wit: by working in their role as guardian and fiduciary, overbilling for
28 visits, shopping trips, court filings, and banking visits thereby unlawfully converting money

1 belonging to KENNETH CHRISTOPHERSON in the amount of approximately \$4,290.00.
2 Defendants are criminally liable under one or more of the following principles of criminal
3 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
4 commission of this crime, with the intent that this crime be committed, by providing counsel
5 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
6 as guardian for KENNETH CHRISTOPHERSON and overcharged for ward visits, shopping
7 trips, bank deposits, house checks, and/or other tasks on behalf of A Private Professional
8 Guardian, LLC that either did not benefit KENNETH CHRISTOPHERSON or did not occur,
9 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
10 and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits,
11 house checks, and/or other tasks on behalf of A Private Professional Guardian, LLC that either
12 did not benefit KENNETH CHRISTOPHERSON or did not occur, and/or directed Angelica
13 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and GARY NEAL
14 TAYLOR conducted unnecessary services and/or overbilled for services on behalf of A
15 Private Professional Guardian, LLC; and/or (3) pursuant to a conspiracy to commit this crime,
16 with the intent that the crime be committed.

17 COUNT 64 - EXPLOITATION OF AN OLDER PERSON

18 Defendants APRIL PARKS and MARK SIMMONS did on or between January 1, 2011
19 and December 31, 2015, willfully, unlawfully and feloniously exploit an older person having
20 been born in 1918, to wit: JOSEPH MASSA, by use of a guardianship converting JOSEPH
21 MASSA's money, assets or property, Defendants intending to permanently deprive JOSEPH
22 MASSA of the ownership, use, benefit or possession of his money, assets or property having
23 an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling
24 for visits, shopping trips, court filings, and banking visits thereby JOSEPH MASSA in the
25 amount of approximately \$5,396.40. Defendants are criminally liable under one or more of
26 the following principles of criminal liability, to wit: (1) by directly committing this crime;
27 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
28 be committed, by providing counsel and/or encouragement and by entering into a course of

1 conduct whereby APRIL PARKS acted as guardian for JOSEPH MASSA and overcharged for
2 ward visits, shopping trips, casino trips, bank deposits, and/or other tasks on behalf of A
3 Private Professional Guardian, LLC that either did not benefit JOSEPH MASSA or did not
4 occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the
5 same; and MARK SIMMONS documented the same ward visits, shopping trips, casino trips,
6 bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either
7 did not benefit JOSEPH MASSA or did not occur, and/or directed Angelica Sanchez and/or
8 Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to
9 commit this crime, with the intent that the crime be committed.

10 COUNT 65 - THEFT

11 Defendants APRIL PARKS and MARK SIMMONS did on or between January 1, 2011
12 and December 31, 2015, willfully, knowingly, feloniously, and without lawful authority, use
13 the services or property of another person entrusted to them, or placed in their possession for
14 a limited, authorized period of determined or prescribed duration or for a limited use, having
15 a value of \$3,500.00 or more, belonging to JOSEPH MASSA and/or the ESTATE OF JOSEPH
16 MASSA, in the following manner, to wit: by working in their role as guardian and fiduciary,
17 overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully
18 converting money belonging to JOSEPH MASSA in the amount of approximately \$5,396.40.
19 Defendants are criminally liable under one or more of the following principles of criminal
20 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
21 commission of this crime, with the intent that this crime be committed, by providing counsel
22 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
23 as guardian for JOSEPH MASSA and overcharged for ward visits, shopping trips, casino trips,
24 bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either
25 did not benefit JOSEPH MASSA or did not occur, and/or directed Angelica Sanchez and/or
26 Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the
27 same ward visits, shopping trips, casino trips, bank deposits, and/or other tasks on behalf of A
28 Private Professional Guardian, LLC that either did not benefit JOSEPH MASSA or did not

1 occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the
2 same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime
3 be committed.

4 COUNT 66 - EXPLOITATION OF AN OLDER PERSON

5 Defendants APRIL PARKS and MARK SIMMONS did on or between July 1, 2014
6 and January 6, 2016, willfully, unlawfully and feloniously exploit an older person having been
7 born in 1920, to wit: BLANCA GINORIO, by use of a guardianship converting BLANCA
8 GINORIO's money, assets or property, Defendants intending to permanently deprive
9 BLANCA GINORIO of the ownership, use, benefit or possession of his money, assets or
10 property having an value of more than \$650.00, by working in their role as guardian and
11 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
12 BLANCA GINORIO in the amount of approximately \$2,497.20. Defendants are criminally
13 liable under one or more of the following principles of criminal liability, to wit: (1) by directly
14 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
15 the intent that this crime be committed, by providing counsel and/or encouragement and by
16 entering into a course of conduct whereby APRIL PARKS acted as guardian for BLANCA
17 GINORIO and overcharged for ward visits, shopping trips, bank deposits, and/or other tasks
18 on behalf of A Private Professional Guardian, LLC that either did not benefit BLANCA
19 GINORIO or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue
20 Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping
21 trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that
22 either did not benefit BLANCA GINORIO or did not occur, and/or directed Angelica Sanchez
23 and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy
24 to commit this crime, with the intent that the crime be committed.

25 COUNT 67 - THEFT

26 Defendants APRIL PARKS and MARK SIMMONS did on or between July 1, 2014
27 and January 6, 2016, willfully, knowingly, feloniously, and without lawful authority, use the
28 services or property of another person entrusted to them, or placed in their possession for a

1 limited, authorized period of determined or prescribed duration or for a limited use, having a
2 value of \$650.00 or more, belonging to BLANCA GINORIO and/or the ESTATE OF
3 BLANCA GINORIO, in the following manner, to wit: by working in their role as guardian
4 and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
5 unlawfully converting money belonging to BLANCA GINORIO in the amount of
6 approximately \$2,497.20. Defendants are criminally liable under one or more of the following
7 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
8 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
9 by providing counsel and/or encouragement and by entering into a course of conduct whereby
10 APRIL PARKS acted as guardian for BLANCA GINORIO and overcharged for ward visits,
11 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
12 LLC that either did not benefit BLANCA GINORIO or did not occur, and/or directed Angelica
13 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
14 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
15 of A Private Professional Guardian, LLC that either did not benefit BLANCA GINORIO or
16 did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
17 do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
18 crime be committed.

19 COUNT 68 - EXPLOITATION OF AN OLDER PERSON

20 Defendants APRIL PARKS and MARK SIMMONS did on or between December 31,
21 2009 and October 7, 2015, willfully, unlawfully and feloniously exploit an older person having
22 been born in 1935, to wit: DANIEL CURRIE, by use of a guardianship converting DANIEL
23 CURRIE's money, assets or property, Defendants intending to permanently deprive DANIEL
24 CURRIE of the ownership, use, benefit or possession of his money, assets or property having
25 an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling
26 for visits, shopping trips, court filings, and banking visits thereby DANIEL CURRIE in the
27 amount of approximately \$8,149.70. Defendants are criminally liable under one or more of
28 the following principles of criminal liability, to wit: (1) by directly committing this crime;

1 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
2 be committed, by providing counsel and/or encouragement and by entering into a course of
3 conduct whereby APRIL PARKS acted as guardian for DANIEL CURRIE and overcharged
4 for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
5 Professional Guardian, LLC that either did not benefit DANIEL CURRIE or did not occur,
6 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
7 and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits,
8 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
9 DANIEL CURRIE or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer
10 and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime,
11 with the intent that the crime be committed.

12 COUNT 69 - THEFT

13 Defendants APRIL PARKS and MARK SIMMONS did on or between December 31,
14 2009 and October 7, 2015, willfully, knowingly, feloniously, and without lawful authority, use
15 the services or property of another person entrusted to them, or placed in their possession for
16 a limited, authorized period of determined or prescribed duration or for a limited use, having
17 a value of \$3,500.00 or more, belonging to DANIEL CURRIE and/or the ESTATE OF
18 DANIEL CURRIE, in the following manner, to wit: by working in their role as guardian and
19 fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby
20 unlawfully converting money belonging to DANIEL CURRIE in the amount of approximately
21 \$8,149.70. Defendants are criminally liable under one or more of the following principles of
22 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting
23 in the commission of this crime, with the intent that this crime be committed, by providing
24 counsel and/or encouragement and by entering into a course of conduct whereby APRIL
25 PARKS acted as guardian for DANIEL CURRIE and overcharged for ward visits, shopping
26 trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that
27 either did not benefit DANIEL CURRIE or did not occur, and/or directed Angelica Sanchez
28 and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS

1 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
2 of A Private Professional Guardian, LLC that either did not benefit DANIEL CURRIE or did
3 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do
4 the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
5 crime be committed.

6 COUNT 70 - EXPLOITATION OF AN OLDER PERSON

7 Defendants APRIL PARKS and MARK SIMMONS did on or between March 1, 2013
8 and July 10, 2015, willfully, unlawfully and feloniously exploit an older person having been
9 born in 1926, to wit: RITA LAMPPA, by use of a guardianship converting RITA LAMPPA's
10 money, assets or property, Defendants intending to permanently deprive RITA LAMPPA of
11 the ownership, use, benefit or possession of his money, assets or property having an value of
12 more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits,
13 shopping trips, court filings, and banking visits thereby RITA LAMPPA in the amount of
14 approximately \$4,311.20. Defendants are criminally liable under one or more of the following
15 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
16 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
17 by providing counsel and/or encouragement and by entering into a course of conduct whereby
18 APRIL PARKS acted as guardian for RITA LAMPPA and overcharged for ward visits,
19 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
20 LLC that either did not benefit RITA LAMPPA or did not occur, and/or directed Angelica
21 Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
22 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf
23 of A Private Professional Guardian, LLC that either did not benefit RITA LAMPPA or did not
24 occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the
25 same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime
26 be committed.

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1 COUNT 71 - THEFT

2 Defendants APRIL PARKS and MARK SIMMONS did on or between March 1, 2013
3 and July 10, 2015, willfully, knowingly, feloniously, and without lawful authority, use the
4 services or property of another person entrusted to them, or placed in their possession for a
5 limited, authorized period of determined or prescribed duration or for a limited use, having a
6 value of \$3,500.00 or more, belonging to RITA LAMPPA and/or the ESTATE OF RITA
7 LAMPPA, in the following manner, to wit: by working in their role as guardian and fiduciary,
8 overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully
9 converting money belonging to RITA LAMPPA in the amount of approximately \$4,311.20.
10 Defendants are criminally liable under one or more of the following principles of criminal
11 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
12 commission of this crime, with the intent that this crime be committed, by providing counsel
13 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
14 as guardian for RITA LAMPPA and overcharged for ward visits, shopping trips, bank
15 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did
16 not benefit RITA LAMPPA or did not occur, and/or directed Angelica Sanchez and/or Heidi
17 Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same
18 ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private
19 Professional Guardian, LLC that either did not benefit RITA LAMPPA or did not occur, and/or
20 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3)
21 pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

22 COUNT 72 - EXPLOITATION OF AN OLDER PERSON

23 Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR did on
24 or about October 31, 2013 willfully, unlawfully and feloniously exploit persons over the age
25 of 60, to wit: CYPRIAN FRASER and/or DONALD GRAHAM and/or HANS SCHOLL
26 and/or ADOLFO GONZALEZ and/or RUDY NORTH, RENNIE NORTH and/or HAROLD
27 LOCKWOOD and/or MARLENE HOMER and/or MARIE LONG and/or MARY VITEK
28 and/or NORBERT WILKENING and/or JACQUELINE NOSBICH, by use of a guardianship

1 converting said victims' money, assets or property, Defendants intending to permanently
2 deprive said victims of the ownership, use, benefit or possession of their money, assets or
3 property having an value of more than \$650.00, by Defendants working in their role as
4 guardian and fiduciary, overbilling for visits, shopping trips, dropping off toilet paper, and
5 visiting mortuary, thereby depriving said victims in the amount of approximately \$1,405.20.
6 Defendants are criminally liable under one or more of the following principles of criminal
7 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
8 commission of this crime, with the intent that this crime be committed, by providing counsel
9 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
10 as guardian for the above-listed victims, and overcharged for ward visits, shopping trips,
11 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
12 the victims or did not occur, and/or directed GARY NEAL TAYLOR to do the same; and
13 MARK SIMMONS documented the same ward visits, shopping trips, and/or other tasks on
14 behalf of A Private Professional Guardian, LLC that either did not benefit the victims or should
15 have been provided by a greatly reduced cost; and/or (3) pursuant to a conspiracy to commit
16 this crime, with the intent that the crime be committed.

17 COUNT 73 - THEFT

18 Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR did on
19 or about October 31, 2013 willfully, knowingly, feloniously, and without lawful authority, use
20 the services or property of another person entrusted to them, or placed in their possession for
21 a limited, authorized period of determined or prescribed duration or for a limited use, having
22 a value of \$650.00 or more, belonging to CYPRIAN FRASER and/or DONALD GRAHAM
23 and/or HANS SCHOLL and/or ADOLFO GONZALEZ and/or RUDY NORTH and/or
24 RENNIE NORTH and/or HAROLD LOCKWOOD and/or MARLENE HOMER and/or
25 MARIE LONG and/or MARY VITEK and/or NORBERT WILKENING and/or
26 JACQUELINE NOSBICH and/or the estates of said victims, in the following manner, to wit:
27 by working in their role as guardian and fiduciary, overbilling for visits, shopping trips,
28 dropping off toilet paper, and visiting mortuary, thereby unlawfully converting money

1 belonging said victims in the amount of approximately \$1,405.20. Defendants are criminally
2 liable under one or more of the following principles of criminal liability, to wit: (1) by directly
3 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
4 the intent that this crime be committed, by providing counsel and/or encouragement and by
5 entering into a course of conduct whereby APRIL PARKS acted as guardian for the above-
6 listed victims, and overcharged for ward visits, shopping trips, and/or other tasks on behalf of
7 A Private Professional Guardian, LLC that either did not benefit the victims or did not occur,
8 and/or directed GARY NEAL TAYLOR to do the same; and MARK SIMMONS documented
9 the same ward visits, shopping trips, and/or other tasks on behalf of A Private Professional
10 Guardian, LLC that either did not benefit the victims or should have been provided by a greatly
11 reduced cost; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
12 crime be committed.

13 COUNT 74 - EXPLOITATION OF A VULNERABLE PERSON

14 Defendants APRIL PARKS and MARK SIMMONS did on or about February 20, 2015
15 willfully, unlawfully and feloniously exploit a vulnerable person having a mental illness, to
16 wit: BARBARA NEELY, by use of a guardianship converting BARBARA NEELY's money,
17 assets or property, Defendants intending to permanently deprive BARBARA NEELY of the
18 ownership, use, benefit or possession of his money, assets or property having an value of more
19 than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits,
20 shopping trips, court filings, and banking visits and/or by withdrawing funds from BARBARA
21 NEELY's account in excess of the amount actually billed to BARBARA NEELY, thereby
22 depriving BARBARA NEELY in the amount of approximately \$895.00. Defendants are
23 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
24 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
25 crime, with the intent that this crime be committed, by providing counsel and/or
26 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
27 guardian for BARBARA NEELY, and overcharged for ward visits, shopping trips, bank
28 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did

1 not benefit BARBARA NEELY or did not occur, and/or withdrew excessive funds from the
2 account of BARBARA NEELY, and/or directed Angelica Sanchez and/or Heidi Kramer
3 and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits,
4 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
5 LLC that either did not benefit BARBARA NEELY or did not occur, and/or withdrew
6 excessive funds from the account of BARBARA NEELY, and/or directed Angelica Sanchez
7 and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy
8 to commit this crime, with the intent that the crime be committed.

9 COUNT 75 - THEFT

10 Defendants APRIL PARKS and MARK SIMMONS did on or about February 20, 2015
11 willfully, knowingly, feloniously, and without lawful authority, use the services or property of
12 another person entrusted to them, or placed in their possession for a limited, authorized period
13 of determined or prescribed duration or for a limited use, having a value of \$650.00 or more,
14 belonging to BARBARA NEELY and/or the ESTATE OF BARBARA NEELY, in the
15 following manner, to wit: by working in their role as guardian and fiduciary, overbilling for
16 visits, shopping trips, court filings, and banking visits, and/or by withdrawing funds from
17 BARBARA NEELY's account in excess of the amount actually billed to BARBARA NEELY,
18 thereby unlawfully converting money belonging to BARBARA NEELY in the amount of
19 approximately \$895.00. Defendants are criminally liable under one or more of the following
20 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
21 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
22 by providing counsel and/or encouragement and by entering into a course of conduct whereby
23 APRIL PARKS acted as guardian for BARBARA NEELY, and overcharged for ward visits,
24 shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian,
25 LLC that either did not benefit BARBARA NEELY or did not occur, and/or withdrew
26 excessive funds from the account of BARBARA NEELY, and/or directed Angelica Sanchez
27 and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS
28 documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf

1 of A Private Professional Guardian, LLC that either did not benefit BARBARA NEELY or
2 did not occur, and/or withdrew excessive funds from the account of BARBARA NEELY,
3 and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;
4 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
5 committed.

6 **COUNT 76 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**

7 Defendant APRIL PARKS did on or about April 15, 2015, willfully, unlawfully,
8 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
9 or recorded at Clark County District Court, to wit: a receipt falsely representing that Defendant
10 had paid herself full and final guardianship fees related to BARBARA NEELY, which
11 instrument, if genuine, might be filed, registered or recorded in a public office under any law
12 of the State of Nevada.

13 **COUNT 77 - EXPLOITATION OF AN OLDER PERSON**

14 Defendants APRIL PARKS and MARK SIMMONS did on or between February 1,
15 2012 and October 7, 2015 willfully, unlawfully and feloniously exploit persons over the age
16 of 60, to wit: over 130 elderly persons under APRIL PARKS' guardianship, by converting
17 said persons' money, assets or property, with Defendants intending to permanently deprive
18 said persons of the ownership, use, benefit or possession of their money, assets or property,
19 having a value of more than \$5,000.00, in the amount of approximately \$67,775.70, by use of
20 a scheme involving overbilling and/or multiple-billing while making bank deposits for said
21 persons. Defendants are criminally liable under one or more of the following principles of
22 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting
23 in the commission of this crime, with the intent that this crime be committed, by providing
24 counsel and/or encouragement and by entering into a course of conduct whereby APRIL
25 PARKS acted as guardian for the above-listed victims, and overcharged for bank deposits
26 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
27 the victims or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or
28 Sue Pehrson to do the same; and MARK SIMMONS documented the same bank deposits

1 and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit
2 the victims or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or
3 Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the
4 intent that the crime be committed.

5 COUNT 78 - THEFT

6 Defendants APRIL PARKS and MARK SIMMONS did on or between February 1,
7 2012 and October 7, 2015 willfully, knowingly, feloniously, and without lawful authority, use
8 the services or property of another person entrusted to them, or placed in their possession for
9 a limited, authorized period of determined or prescribed duration or for a limited use, having
10 a value of \$3,500.00 or more, belonging to over 130 elderly persons under APRIL PARKS'
11 guardianship, in the following manner, to wit: by use of a scheme involving overbilling and/or
12 multiple-billing while making bank deposits for said persons, thereby unlawfully converting
13 money belonging to said persons in the amount of approximately \$67,775.70. Defendants are
14 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
15 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
16 crime, with the intent that this crime be committed, by providing counsel and/or
17 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
18 guardian for the above-listed victims, and overcharged for bank deposits and/or other tasks on
19 behalf of A Private Professional Guardian, LLC that either did not benefit the victims or did
20 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do
21 the same; and MARK SIMMONS documented the same bank deposits and/or other tasks on
22 behalf of A Private Professional Guardian, LLC that either did not benefit the victims or did
23 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do
24 the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
25 crime be committed.

26 COUNT 79 - EXPLOITATION OF AN OLDER PERSON

27 Defendants APRIL PARKS, MARK SIMMONS and GARY NEAL TAYLOR did on
28 or between March 7, 2012 and October 7, 2015 willfully, unlawfully and feloniously exploit

1 persons over the age of 60, to wit: over 109 elderly persons under APRIL PARKS'
2 guardianship, by converting said persons' money, assets or property, with Defendants
3 intending to permanently deprive said persons of the ownership, use, benefit or possession of
4 their money, assets or property, having a value of more than \$5,000.00, in the amount of
5 approximately \$74,229.90, by use of a scheme involving overbilling and/or multiple-billing
6 while making court appearances and/or filing court paperwork for said persons. Defendants
7 are criminally liable under one or more of the following principles of criminal liability, to wit:
8 (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of
9 this crime, with the intent that this crime be committed, by providing counsel and/or
10 encouragement and by entering into a course of conduct whereby APRIL PARKS acted as
11 guardian for the above-listed victims, and overcharged for making court appearances and/or
12 filing court paperwork and/or other tasks on behalf of A Private Professional Guardian, LLC
13 that either did not benefit the victims or did not occur, and/or directed Angelica Sanchez and/or
14 Heidi Kramer and/or Sue Pehrson and/or GARY NEAL TAYLOR to do the same; and MARK
15 SIMMONS documented the same court appearances and/or other tasks on behalf of A Private
16 Professional Guardian, LLC that either did not benefit the victims or did not occur, and/or
17 directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson and/or GARY NEAL
18 TAYLOR to do the same; and GARY NEAL TAYLOR made unnecessary court trips and
19 multiple-billed said victims for making these court trips; and/or (3) pursuant to a conspiracy
20 to commit this crime, with the intent that the crime be committed.

21 COUNT 80 - THEFT

22 Defendants APRIL PARKS, MARK SIMMONS and GARY NEAL TAYLOR did on
23 or between March 7, 2012 and October 7, 2015 willfully, knowingly, feloniously, and without
24 lawful authority, use the services or property of another person entrusted to them, or placed in
25 their possession for a limited, authorized period of determined or prescribed duration or for a
26 limited use, having a value of \$3,500.00 or more, belonging to over 109 elderly persons under
27 APRIL PARKS' guardianship, in the following manner, to wit: by use of a scheme involving
28 overbilling and/or multiple-billing while making court appearances and/or filing court

1 paperwork for said persons, thereby unlawfully converting money belonging to said persons
2 in the amount of approximately \$74,229.90. Defendants are criminally liable under one or
3 more of the following principles of criminal liability, to wit: (1) by directly committing this
4 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this
5 crime be committed, by providing counsel and/or encouragement and by entering into a course
6 of conduct whereby APRIL PARKS acted as guardian for the above-listed victims, and
7 overcharged for making court appearances and/or filing court paperwork and/or other tasks on
8 behalf of A Private Professional Guardian, LLC that either did not benefit the victims or did
9 not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson and/or
10 GARY NEAL TAYLOR to do the same; and MARK SIMMONS documented the same court
11 appearances and/or other tasks on behalf of A Private Professional Guardian, LLC that either
12 did not benefit the victims or did not occur, and/or directed Angelica Sanchez and/or Heidi
13 Kramer and/or Sue Pehrson and/or GARY NEAL TAYLOR to do the same; and GARY NEAL
14 TAYLOR made unnecessary court trips and multiple-billed said victims for making these
15 court trips; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
16 crime be committed.

17 COUNT 81 - THEFT

18 Defendant APRIL PARKS did on or between April 1, 2012 and August 27, 2013
19 willfully, knowingly, feloniously, and without lawful authority, use the services or property of
20 another person entrusted to her, or placed in her possession for a limited, authorized period of
21 determined or prescribed duration or for a limited use, having a value of \$650.00 or more,
22 belonging to WILLIAM ARNOLD and/or DOUGLAS JOBSON and/or AUDREY WEBER,
23 AVA MARTIN and/or DAKOTA JONES and/or PATRICIA BROADAWAY, in the
24 following manner, to wit: by use of a false billing scheme involving applications to become a
25 Social Security representative payee for each of the above-named individuals, thereby
26 unlawfully converting money belonging to said persons in the amount of approximately
27 \$1,344.00, and/or by directing Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to
28 do the same.

1 COUNT 82 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about December 21, 2011 willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a Petition for Appointment of Temporary
5 and General Guardian of the Person and Estate containing false statements in the case of
6 BAXTER BURNS G-11-036744-A, which instrument, if genuine, might be filed, registered
7 or recorded in a public office under any law of the State of Nevada.

8 COUNT 83 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

9 Defendant APRIL PARKS did on or about May 15, 2013 willfully, unlawfully,
10 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
11 or recorded at Clark County District Court, to wit: a First and Final Account and Report of
12 Guardian, Petition for Payment of Fees, Termination of Guardianship, and for Instructions
13 containing false statements in the case of WILLIAM ARNOLD G-11-036382-A, which
14 instrument, if genuine, might be filed, registered or recorded in a public office under any law
15 of the State of Nevada.

16 COUNT 84 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

17 Defendants APRIL PARKS and NOEL PALMER SIMPSON did on or about April 19,
18 2012 willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged
19 instrument to be filed, registered or recorded at Clark County District Court, to wit: a Petition
20 to Set Aside Estate without Administration in the probate case of MARY WOODS P-12-
21 074144-E, in which Petition Defendants claim that there is no record of a last will and
22 testament of MARY WOODS, knowing this to be false; which instrument, if genuine, might
23 be filed, registered, or recorded in a public office under any law of the State of Nevada.
24 Defendants are criminally liable under one or more of the following principles of criminal
25 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
26 commission of this crime, with the intent that this crime be committed, by providing counsel
27 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted
28 as guardian for MARY WOODS, and offered for filing a Petition to Set Aside Estate without

1 Administration in the probate case of MARY WOODS P-12-074144-E; and whereby NOEL
2 PALMER SIMPSON authored the same Petition to Set Aside Estate Without Administration
3 in the probate case of MARY WOODS P-12-074144-E, knowing that APRIL PARKS would
4 file said petition without having authority to do so; and/or (3) pursuant to a conspiracy to
5 commit this crime, with the intent that the crime be committed.

6 COUNT 85 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

7 Defendant APRIL PARKS did on or about June 15, 2013 willfully, unlawfully,
8 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
9 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
10 Approve Final Accounting containing false statements in the case of DOUGLAS JOBSON G-
11 12-036961-A, which instrument, if genuine, might be filed, registered or recorded in a public
12 office under any law of the State of Nevada.

13 COUNT 86 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

14 Defendant APRIL PARKS did on or about June 18, 2013 willfully, unlawfully,
15 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
16 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
17 Approve Final Accounting containing false statements in the case of AUDREY WEBER G-
18 12-036900-A, which instrument, if genuine, might be filed, registered or recorded in a public
19 office under any law of the State of Nevada.

20 COUNT 87 - PERJURY

21 Defendant APRIL PARKS did on or about June 18, 2013 willfully made a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
24 and Approve Final Accounting in the guardianship case of AUDREY WEBER G-12-036900-
25 A, which document claimed that Defendant was owed fees for services rendered that were not
26 in fact rendered to the extent and duration claimed, which statement was material to the filing
27 in question.

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1 COUNT 88 - PERJURY

2 Defendant MARK SIMMONS did on or about June 18, 2013, suborn APRIL PARKS
3 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
4 Professional Guardian, LLC to falsify records, of the amount and value of services provided
5 in the guardianship case of AUDREY WEBER G-12-036900-A, knowing that APRIL PARKS
6 would knowingly offer for filing with the Clark County District Court, under penalty of
7 perjury, a Petition to Terminate Guardianship and Approve Final Accounting in the
8 guardianship case of AUDREY WEBER G-12-036900-A, which document claimed that
9 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
10 and duration claimed, which statement was material to the filing in question.

11 COUNT 89 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

12 Defendant APRIL PARKS did on or about June 27, 2013 willfully, unlawfully,
13 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
14 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
15 Approve Final Accounting containing false statements in the case of AVA MARTIN G-11-
16 036663-A, which instrument, if genuine, might be filed, registered or recorded in a public
17 office under any law of the State of Nevada.

18 COUNT 90 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

19 Defendant APRIL PARKS did on or about June 28, 2013 willfully, unlawfully,
20 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
21 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
22 Approve Final Accounting containing false statements in the case of DAKOTA JONES G-12-
23 036960-A, which instrument, if genuine, might be filed, registered or recorded in a public
24 office under any law of the State of Nevada.

25 COUNT 91 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

26 Defendant APRIL PARKS did on or about October 8, 2013 willfully, unlawfully,
27 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
28 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and

1 Approve Final Accounting containing false statements in the case of PATRICIA
2 BROADAWAY G-12-036924-A, which instrument, if genuine, might be filed, registered or
3 recorded in a public office under any law of the State of Nevada.

4 COUNT 92 - PERJURY

5 Defendant APRIL PARKS did on or about December 18, 2014 willfully make a false
6 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
7 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
8 of Guardian in the guardianship case of JAMES POYA G-11-036043-A, which document
9 claimed that Defendant was owed fees for services rendered that were not in fact rendered to
10 the extent and duration claimed, which statement was material to the filing in question.

11 COUNT 93 - PERJURY

12 Defendant MARK SIMMONS did on or about December 18, 2014, suborn APRIL
13 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
14 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
15 provided in the guardianship case of JAMES POYA G-11-036043-A, knowing that APRIL
16 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
17 of perjury, a First Annual Accounting and Report of Guardian in the guardianship case of
18 JAMES POYA G-11-036043-A, which document claimed that APRIL PARKS was owed fees
19 for services rendered that were not in fact rendered to the extent and duration claimed, which
20 statement was material to the filing in question.

21 COUNT 94 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

22 Defendant APRIL PARKS did on or about December 18, 2014 willfully, unlawfully,
23 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
24 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
25 Guardian containing false statements in the guardianship case of JAMES POYA G-11-
26 036043-A, which instrument, if genuine, might be filed, registered or recorded in a public
27 office under any law of the State of Nevada.

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1 COUNT 95 - PERJURY

2 Defendant APRIL PARKS did on or about July 30, 2015 willfully make a false
3 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
4 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
5 Report of Guardian in the guardianship case of JAMES POYA G-11-036043-A, which
6 document claimed that Defendant was owed fees for services rendered that were not in fact
7 rendered to the extent and duration claimed, which statement was material to the filing in
8 question.

9 COUNT 96 - PERJURY

10 Defendant MARK SIMMONS did on or about July 30, 2015, suborn APRIL PARKS
11 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
12 Professional Guardian, LLC to falsify records, of the amount and value of services provided
13 in the guardianship case of JAMES POYA G-11-036043-A, knowing that APRIL PARKS
14 would knowingly offer for filing with the Clark County District Court, under penalty of
15 perjury, a Second Annual Accounting and Report of Guardian in the guardianship case of
16 JAMES POYA G-11-036043-A, which document claimed that APRIL PARKS was owed fees
17 for services rendered that were not in fact rendered to the extent and duration claimed, which
18 statement was material to the filing in question.

19 COUNT 97 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

20 Defendant APRIL PARKS did on or about July 30, 2015 willfully, unlawfully,
21 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
22 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
23 of Guardian containing false statements in the guardianship case of JAMES POYA G-11-
24 036043-A, which instrument, if genuine, might be filed, registered or recorded in a public
25 office under any law of the State of Nevada.

26 COUNT 98 - PERJURY

27 Defendant APRIL PARKS did on or about March 25, 2016, willfully make a false
28 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the

1 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
2 and Approve Final Accounting in the guardianship case of JAMES POYA G-11-036043-A,
3 which document claimed that Defendant was owed fees for services rendered that were not in
4 fact rendered to the extent and duration claimed, which statement was material to the filing in
5 question.

6 COUNT 99 - PERJURY

7 Defendant MARK SIMMONS did on or about March 25, 2015, suborn APRIL PARKS
8 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
9 Professional Guardian, LLC to falsify records, of the amount and value of services provided
10 in the guardianship case of JAMES POYA G-11-036043-A, knowing that APRIL PARKS
11 would knowingly offer for filing with the Clark County District Court, under penalty of
12 perjury, a Petition to Terminate Guardianship and Approve Final Accounting in the
13 guardianship case of JAMES POYA G-11-036043-A, which document claimed that APRIL
14 PARKS was owed fees for services rendered that were not in fact rendered to the extent and
15 duration claimed, which statement was material to the filing in question.

16 COUNT 100 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

17 Defendant APRIL PARKS did on or about March 25, 2016 willfully, unlawfully,
18 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
19 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
20 Approve Final Accounting containing false statements in the guardianship case of JAMES
21 POYA G-11-036043-A, which instrument, if genuine, might be filed, registered or recorded
22 in a public office under any law of the State of Nevada.

23 COUNT 101 - PERJURY

24 Defendant APRIL PARKS did on or about June 18, 2014, willfully make a false
25 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
26 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
27 of Guardian in the guardianship case of RUTH BRASLOW G-13-038228-A, which document

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1 claimed that Defendant was owed fees for services rendered that were not in fact rendered to
2 the extent and duration claimed, which statement was material to the filing in question.

3 COUNT 102 - PERJURY

4 Defendant MARK SIMMONS did on or about June 18, 2014, suborn APRIL PARKS
5 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
6 Professional Guardian, LLC to falsify records, of the amount and value of services provided
7 in the guardianship case of RUTH BRASLOW G-13-038228-A, knowing that APRIL PARKS
8 would knowingly offer for filing with the Clark County District Court, under penalty of
9 perjury, a First Annual Accounting and Report of Guardian in the guardianship case of RUTH
10 BRASLOW G-13-038228-A, which document claimed that APRIL PARKS was owed fees
11 for services rendered that were not in fact rendered to the extent and duration claimed, which
12 statement was material to the filing in question.

13 COUNT 103 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

14 Defendant APRIL PARKS did on or about June 18, 2014, willfully, unlawfully,
15 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
16 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
17 Guardian containing false statements in the guardianship case of RUTH BRASLOW G-13-
18 038228-A, which instrument, if genuine, might be filed, registered or recorded in a public
19 office under any law of the State of Nevada.

20 COUNT 104 - PERJURY

21 Defendant APRIL PARKS did on or about May 4, 2015, willfully make a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
24 Report of Guardian in the guardianship case of RUTH BRASLOW G-13-038228-A, which
25 document claimed that Defendant was owed fees for services rendered that were not in fact
26 rendered to the extent and duration claimed, which statement was material to the filing in
27 question.

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1 COUNT 105 - PERJURY

2 Defendant MARK SIMMONS did on or about May 4, 2015, suborn APRIL PARKS to
3 commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
4 Professional Guardian, LLC to falsify records, of the amount and value of services provided
5 in the guardianship case of RUTH BRASLOW G-13-038228-A, knowing that APRIL PARKS
6 would knowingly offer for filing with the Clark County District Court, under penalty of
7 perjury, a Second Annual Accounting and Report of Guardian in the guardianship case of
8 RUTH BRASLOW G-13-038228-A, which document claimed that APRIL PARKS was owed
9 fees for services rendered that were not in fact rendered to the extent and duration claimed,
10 which statement was material to the filing in question.

11 COUNT 106 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

12 Defendant APRIL PARKS did on or about May 4, 2015, willfully, unlawfully,
13 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
14 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
15 of Guardian containing false statements in the guardianship case of RUTH BRASLOW G-13-
16 038228-A, which instrument, if genuine, might be filed, registered or recorded in a public
17 office under any law of the State of Nevada.

18 COUNT 107 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

19 Defendant APRIL PARKS did on or about May 27, 2015, willfully, unlawfully,
20 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
21 or recorded at Clark County District Court, to wit: a Supplement to Second Annual
22 Accounting and Report of Guardian containing false statements in the guardianship case of
23 RUTH BRASLOW G-13-038228-A, which instrument, if genuine, might be filed, registered
24 or recorded in a public office under any law of the State of Nevada.

25 COUNT 108 - PERJURY

26 Defendant APRIL PARKS did on or about May 3, 2016, willfully make a false
27 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
28 Clark County District Court, under penalty of perjury, a Petition to Approve Final Accounting

1 in the guardianship case of RUTH BRASLOW G-13-038228-A, which document claimed that
2 Defendant was owed fees for services rendered that were not in fact rendered to the extent and
3 duration claimed, which statement was material to the filing in question.

4 COUNT 109 - PERJURY

5 Defendant MARK SIMMONS did on or about May 3, 2016, suborn APRIL PARKS to
6 commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
7 Professional Guardian, LLC to falsify records, of the amount and value of services provided
8 in the guardianship case of RUTH BRASLOW G-13-038228-A, knowing that APRIL PARKS
9 would knowingly offer for filing with the Clark County District Court, under penalty of
10 perjury, a Petition to Approve Final Accounting in the guardianship case of RUTH
11 BRASLOW G-13-038228-A, which document claimed that Defendant was owed fees for
12 services rendered that were not in fact rendered to the extent and duration claimed, which
13 statement was material to the filing in question.

14 COUNT 110 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

15 Defendant APRIL PARKS did on or about May 3, 2016 willfully, unlawfully,
16 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
17 or recorded at Clark County District Court, to wit: a Petition to Approve Final Accounting
18 containing false statements in the guardianship case of RUTH BRASLOW G-13-038228-A,
19 which instrument, if genuine, might be filed, registered or recorded in a public office under
20 any law of the State of Nevada.

21 COUNT 111 - PERJURY

22 Defendant APRIL PARKS did on or about March 15, 2016 willfully make a false
23 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
24 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
25 and Approve Final Accounting in the guardianship case of CAROLYN RICKENBAUGH G-
26 14-040726-A, which document claimed that Defendant was owed fees for services rendered
27 that were not in fact rendered to the extent and duration claimed, which statement was material
28 to the filing in question.

1 COUNT 112 - PERJURY

2 Defendant MARK SIMMONS did on or about March 15, 2016, suborn APRIL PARKS
3 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
4 Professional Guardian, LLC to falsify records, of the amount and value of services provided
5 in the guardianship case of CAROLYN RICKENBAUGH G-14-040726-A, knowing that
6 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
7 penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting in the
8 guardianship case of CAROLYN RICKENBAUGH G-14-040726-A, which document
9 claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered
10 to the extent and duration claimed, which statement was material to the filing in question.

11 COUNT 113 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

12 Defendant APRIL PARKS did on or about March 15, 2016 willfully, unlawfully,
13 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
14 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
15 Approve Final Accounting containing false statements in the guardianship case of CAROLYN
16 RICKENBAUGH G-14-040726-A, which instrument, if genuine, might be filed, registered or
17 recorded in a public office under any law of the State of Nevada.

18 COUNT 114 - PERJURY

19 Defendant APRIL PARKS did on or about August 4, 2015 willfully make a false
20 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
21 Clark County District Court, under penalty of perjury, a First Annual Accounting and Petition
22 for Payment of Fees in the guardianship case of WILLIAM BRADY G-10-035162-A, which
23 document claimed that Defendant was owed fees for services rendered that were not in fact
24 rendered to the extent and duration claimed, which statement was material to the filing in
25 question.

26 COUNT 115 - PERJURY

27 Defendant MARK SIMMONS did on or about August 4, 2015, suborn APRIL PARKS
28 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private

1 Professional Guardian, LLC to falsify records, of the amount and value of services provided
2 in the guardianship case of WILLIAM BRADY G-10-035162-A, knowing that APRIL
3 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
4 of perjury, a First Annual Accounting and Petition for Payment of Fees in the guardianship
5 case of WILLIAM BRADY G-10-035162-A, which document claimed that APRIL PARKS
6 was owed fees for services rendered that were not in fact rendered to the extent and duration
7 claimed, which statement was material to the filing in question.

8 COUNT 116 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

9 Defendant APRIL PARKS did on or about August 4, 2015 willfully, unlawfully,
10 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
11 or recorded at Clark County District Court, to wit: a First Annual Accounting and Petition for
12 Payment of Fees containing false statements in the guardianship case of WILLIAM BRADY
13 G-10-035162-A, which instrument, if genuine, might be filed, registered or recorded in a
14 public office under any law of the State of Nevada.

15 COUNT 117 - PERJURY

16 Defendant APRIL PARKS did on or about March 15, 2016 willfully make a false
17 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
18 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
19 and Approve Final Accounting in the guardianship case of WILLIAM BRADY G-10-035162-
20 A, which document claimed that Defendant was owed fees for services rendered that were not
21 in fact rendered to the extent and duration claimed, which statement was material to the filing
22 in question.

23 COUNT 118 - PERJURY

24 Defendant MARK SIMMONS did on or about March 15, 2016, suborn APRIL PARKS
25 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
26 Professional Guardian, LLC to falsify records, of the amount and value of services provided
27 in the guardianship case of William Brady G-10-035162-A, knowing that APRIL PARKS
28 would knowingly offer for filing with the Clark County District Court, under penalty of

1 perjury, a Petition to Terminate Guardianship and Approve Final Accounting in the
2 guardianship case of WILLIAM BRADY G-10-035162-A, which document claimed that
3 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
4 and duration claimed, which statement was material to the filing in question.

5 COUNT 119 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

6 Defendant APRIL PARKS did on or about March 15, 2016 willfully, unlawfully,
7 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
8 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
9 Approve Final Accounting containing false statements in the guardianship case of WILLIAM
10 BRADY G-10-035162-A, which instrument, if genuine, might be filed, registered or recorded
11 in a public office under any law of the State of Nevada.

12 COUNT 120 - PERJURY

13 Defendant APRIL PARKS did on or about October 2, 2013 willfully make a false
14 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
15 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
16 of Guardian in the guardianship case of DELMOND FOSTER G-10-035339-A, which
17 document claimed that Defendant was owed fees for services rendered that were not in fact
18 rendered to the extent and duration claimed, which statement was material to the filing in
19 question.

20 COUNT 121 - PERJURY

21 Defendant MARK SIMMONS did on or about October 2, 2013, suborn APRIL PARKS
22 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
23 Professional Guardian, LLC to falsify records, of the amount and value of services provided
24 in the guardianship case of DELMOND FOSTER G-10-035339-A, knowing that APRIL
25 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
26 of perjury, a First Annual Accounting and Report of Guardian in the guardianship case of
27 DELMOND FOSTER G-10-035339-A, which document claimed that APRIL PARKS was
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1 owed fees for services rendered that were not in fact rendered to the extent and duration
2 claimed, which statement was material to the filing in question.

3 COUNT 122 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

4 Defendant APRIL PARKS did on or about October 2, 2013 willfully, unlawfully,
5 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
6 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
7 Guardian containing false statements in the guardianship case of DELMOND FOSTER G-10-
8 035339-A, which instrument, if genuine, might be filed, registered or recorded in a public
9 office under any law of the State of Nevada.

10 COUNT 123 - PERJURY

11 Defendant APRIL PARKS did on or about January 9, 2015 willfully make a false
12 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
13 Clark County District Court, under penalty of perjury, a Second and Final Account and Report
14 of Guardian and/or Petition for Payment of Fees and for Termination of Guardianship in the
15 guardianship case of DELMOND FOSTER G-10-035339-A, which document claimed that
16 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
17 and duration claimed, which statement was material to the filing in question.

18 COUNT 124 - PERJURY

19 Defendant MARK SIMMONS did on or about January 9, 2015, suborn APRIL PARKS
20 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
21 Professional Guardian, LLC to falsify records, of the amount and value of services provided
22 in the guardianship case of DELMOND FOSTER G-10-035339-A, knowing that APRIL
23 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
24 of perjury, a Second and Final Account and Report of Guardian and/or Petition for Payment
25 of Fees and for Termination of Guardianship in the guardianship case of DELMOND FOSTER
26 G-10-035339-A, which document claimed that APRIL PARKS was owed fees for services
27 rendered that were not in fact rendered to the extent and duration claimed, which statement
28 was material to the filing in question.

1 COUNT 125 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about January 9, 2015 willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a Second and Final Account and Report of
5 Guardian and/or Petition for Payment of Fees and for Termination of Guardianship containing
6 false statements in the guardianship case of DELMOND FOSTER G-10-035339-A, which
7 instrument, if genuine, might be filed, registered or recorded in a public office under any law
8 of the State of Nevada.

9 COUNT 126 - PERJURY

10 Defendant APRIL PARKS did on or about April 3, 2014 willfully make a false
11 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
12 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
13 Report of Guardian in the guardianship case of PATRICIA SMOAK G-10-035078-A, which
14 document claimed that Defendant was owed fees for services rendered that were not in fact
15 rendered to the extent and duration claimed, which statement was material to the filing in
16 question.

17 COUNT 127 - PERJURY

18 Defendant MARK SIMMONS did on or about April 3, 2014, suborn APRIL PARKS
19 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
20 Professional Guardian, LLC to falsify records, of the amount and value of services provided
21 in the guardianship case of PATRICIA SMOAK G-10-035078-A, knowing that APRIL
22 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
23 of perjury, a Second Annual Accounting and Report of Guardian in the guardianship case of
24 PATRICIA SMOAK G-10-035078-A, which document claimed that APRIL PARKS was
25 owed fees for services rendered that were not in fact rendered to the extent and duration
26 claimed, which statement was material to the filing in question.

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1 COUNT 128 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about April 3, 2014 willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
5 of Guardian containing false statements in the guardianship case of PATRICIA SMOAK G-
6 10-035078-A, which instrument, if genuine, might be filed, registered or recorded in a public
7 office under any law of the State of Nevada.

8 COUNT 129 - PERJURY

9 Defendant APRIL PARKS did on or about April 6, 2015 willfully make a false
10 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
11 Clark County District Court, under penalty of perjury, a Third Annual Accounting and Report
12 of Guardian in the guardianship case of PATRICIA SMOAK G-10-035078-A, which
13 document claimed that Defendant was owed fees for services rendered that were not in fact
14 rendered to the extent and duration claimed, which statement was material to the filing in
15 question.

16 COUNT 130 - PERJURY

17 Defendant MARK SIMMONS did on or about April 6, 2015, suborn APRIL PARKS
18 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
19 Professional Guardian, LLC to falsify records, of the amount and value of services provided
20 in the guardianship case of PATRICIA SMOAK G-10-035078-A, knowing that APRIL
21 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
22 of perjury, a Third Annual Accounting and Report of Guardian in the guardianship case of
23 PATRICIA SMOAK G-10-035078-A, which document claimed that APRIL PARKS was
24 owed fees for services rendered that were not in fact rendered to the extent and duration
25 claimed, which statement was material to the filing in question.

26 COUNT 131 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

27 Defendant APRIL PARKS did on or about April 6, 2015 willfully, unlawfully,
28 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered

1 or recorded at Clark County District Court, to wit: a Third Annual Accounting and Report of
2 Guardian containing false statements in the guardianship case of PATRICIA SMOAK G-10-
3 035078-A, which instrument, if genuine, might be filed, registered or recorded in a public
4 office under any law of the State of Nevada.

5 COUNT 132 - PERJURY

6 Defendant APRIL PARKS did on or about March 8, 2016 willfully make a false
7 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
8 Clark County District Court, under penalty of perjury, a Fourth Annual Accounting of Co-
9 Guardian and Final Account of Former co-Guardian, April L. Parks, Manager of A Private
10 Professional Guardian, LLC, in the guardianship case of PATRICIA SMOAK G-10-035078-
11 A, which document claimed that Defendant was owed fees for services rendered that were not
12 in fact rendered to the extent and duration claimed, which statement was material to the filing
13 in question.

14 COUNT 133 - PERJURY

15 Defendant MARK SIMMONS did on or about March 8, 2016, suborn APRIL PARKS
16 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
17 Professional Guardian, LLC to falsify records, of the amount and value of services provided
18 in the guardianship case of PATRICIA SMOAK G-10-035078-A, knowing that APRIL
19 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
20 of perjury, a Fourth Annual Accounting of Co-Guardian and Final Account of Former co-
21 Guardian, April L. Parks, Manager of A Private Professional Guardian, LLC, in the
22 guardianship case of PATRICIA SMOAK G-10-035078-A, which document claimed that
23 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the
24 extent and duration claimed, which statement was material to the filing in question.

25 COUNT 134 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

26 Defendant APRIL PARKS did on or about March 8, 2016 willfully, unlawfully,
27 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
28 or recorded at Clark County District Court, to wit: a Fourth Annual Accounting of Co-

1 Guardian and Final Account of Former co-Guardian, April L. Parks, Manager of A Private
2 Professional Guardian, LLC, containing false statements in the guardianship case of
3 PATRICIA SMOAK G-10-035078-A, which instrument, if genuine, might be filed, registered
4 or recorded in a public office under any law of the State of Nevada.

5 COUNT 135 - PERJURY

6 Defendant APRIL PARKS did on or about November 14, 2014 willfully make a false
7 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
8 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
9 of Guardian, in the guardianship case of MARILYN SCHOLL G-13-038909-A, which
10 document claimed that Defendant was owed fees for services rendered that were not in fact
11 rendered to the extent and duration claimed, which statement was material to the filing in
12 question.

13 COUNT 136 - PERJURY

14 Defendant MARK SIMMONS did on or about November 14, 2014, suborn APRIL
15 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
16 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
17 provided in the guardianship case of MARILYN SCHOLL G-13-038909-A, knowing that
18 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
19 penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship
20 case of MARILYN SCHOLL G-13-038909-A, which document claimed that APRIL PARKS
21 was owed fees for services rendered that were not in fact rendered to the extent and duration
22 claimed, which statement was material to the filing in question.

23 COUNT 137 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

24 Defendant APRIL PARKS did on or about November 14, 2014 willfully, unlawfully,
25 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
26 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
27 Guardian, containing false statements in the guardianship case of MARILYN SCHOLL G-13-
28

1 038909-A, which instrument, if genuine, might be filed, registered or recorded in a public
2 office under any law of the State of Nevada.

3 COUNT 138 - PERJURY

4 Defendant APRIL PARKS did on or about August 31, 2015 willfully make a false
5 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
6 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
7 Report of Guardian, in the guardianship case of MARILYN SCHOLL G-13-038909-A, which
8 document claimed that Defendant was owed fees for services rendered that were not in fact
9 rendered to the extent and duration claimed, which statement was material to the filing in
10 question.

11 COUNT 139 - PERJURY

12 Defendant MARK SIMMONS did on or about August 31, 2015, suborn APRIL
13 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
14 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
15 provided in the guardianship case of MARILYN SCHOLL G-13-038909-A, knowing that
16 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
17 penalty of perjury, a Second Annual Accounting and Report of Guardian, in the guardianship
18 case of MARILYN SCHOLL G-13-038909-A, which document claimed that APRIL PARKS
19 was owed fees for services rendered that were not in fact rendered to the extent and duration
20 claimed, which statement was material to the filing in question.

21 COUNT 140 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

22 Defendant APRIL PARKS did on or about August 31, 2015 willfully, unlawfully,
23 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
24 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
25 of Guardian, containing false statements in the guardianship case of MARILYN SCHOLL G-
26 13-038909-A, which instrument, if genuine, might be filed, registered or recorded in a public
27 office under any law of the State of Nevada.

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1 COUNT 141 - PERJURY

2 Defendant APRIL PARKS did on or about January 21, 2015 willfully make a false
3 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
4 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
5 of Guardian, in the guardianship case of KENNETH EDWARDS G-13-039636-A, which
6 document claimed that Defendant was owed fees for services rendered that were not in fact
7 rendered to the extent and duration claimed, which statement was material to the filing in
8 question.

9 COUNT 142 - PERJURY

10 Defendant MARK SIMMONS did on or about January 21, 2015, suborn APRIL
11 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
12 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
13 provided in the guardianship case of KENNETH EDWARDS G-13-039636-A, knowing that
14 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
15 penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship
16 case of KENNETH EDWARDS G-13-039636-A, which document claimed that APRIL
17 PARKS was owed fees for services rendered that were not in fact rendered to the extent and
18 duration claimed, which statement was material to the filing in question.

19 COUNT 143 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

20 Defendant APRIL PARKS did on or about January 21, 2015, willfully, unlawfully,
21 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
22 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
23 Guardian, containing false statements in the guardianship case of KENNETH EDWARDS G-
24 13-039636-A, which instrument, if genuine, might be filed, registered or recorded in a public
25 office under any law of the State of Nevada.

26 COUNT 144 - PERJURY

27 Defendant APRIL PARKS did on or about March 15, 2016, willfully make a false
28 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the

1 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
2 and Approve Final Accounting, in the guardianship case of KENNETH EDWARDS G-13-
3 039636-A, which document claimed that Defendant was owed fees for services rendered that
4 were not in fact rendered to the extent and duration claimed, which statement was material to
5 the filing in question.

6 COUNT 145 - PERJURY

7 Defendant MARK SIMMONS did on or about March 15, 2016, suborn APRIL PARKS
8 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
9 Professional Guardian, LLC to falsify records, of the amount and value of services provided
10 in the guardianship case of KENNETH EDWARDS G-13-039636-A, knowing that APRIL
11 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
12 of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the
13 guardianship case of KENNETH EDWARDS G-13-039636-A, which document claimed that
14 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
15 and duration claimed, which statement was material to the filing in question.

16 COUNT 146 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

17 Defendant APRIL PARKS did on or about March 15, 2016, willfully, unlawfully,
18 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
19 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
20 Approve Final Accounting, containing false statements in the guardianship case of KENNETH
21 EDWARDS G-13-039636-A, which instrument, if genuine, might be filed, registered or
22 recorded in a public office under any law of the State of Nevada.

23 COUNT 147 - PERJURY

24 Defendant APRIL PARKS did on or about May 30, 2014, willfully make a false
25 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
26 Clark County District Court, under penalty of perjury, a Fourth Annual Accounting and Report
27 of Guardian, in the guardianship case of GLORIA SCHNERINGER G-09-034019-A, which
28 document claimed that Defendant was owed fees for services rendered that were not in fact

1 rendered to the extent and duration claimed, which statement was material to the filing in
2 question.

3 COUNT 148 - PERJURY

4 Defendant MARK SIMMONS did on or about May 30, 2014, suborn APRIL PARKS
5 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
6 Professional Guardian, LLC to falsify records, of the amount and value of services provided
7 in the guardianship case of GLORIA SCHNERINGER G-09-034019-A, knowing that APRIL
8 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
9 of perjury, a Fourth Annual Accounting and Report of Guardian, in the guardianship case of
10 GLORIA SCHNERINGER G-09-034019-A, which document claimed that APRIL PARKS
11 was owed fees for services rendered that were not in fact rendered to the extent and duration
12 claimed, which statement was material to the filing in question.

13 COUNT 149 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

14 Defendant APRIL PARKS did on or about May 30, 2014, willfully, unlawfully,
15 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
16 or recorded at Clark County District Court, to wit: a Fourth Annual Accounting and Report
17 of Guardian, containing false statements in the guardianship case of GLORIA
18 SCHNERINGER G-09-034019-A, which instrument, if genuine, might be filed, registered or
19 recorded in a public office under any law of the State of Nevada.

20 COUNT 150 - PERJURY

21 Defendant APRIL PARKS did on or about March 23, 2015, willfully make a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a Fifth Annual Account and Report of
24 Guardian, Notice of Death of Co-Guardian James N. Schneringer and/or Order for
25 Confirmation of Investing the wards Funds, in the guardianship case of GLORIA
26 SCHNERINGER G-09-034019-A, which document claimed that Defendant was owed fees
27 for services rendered that were not in fact rendered to the extent and duration claimed, which
28 statement was material to the filing in question.

1 COUNT 151 - PERJURY

2 Defendant MARK SIMMONS did on or about March 23, 2015, suborn APRIL PARKS
3 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
4 Professional Guardian, LLC to falsify records, of the amount and value of services provided
5 in the guardianship case of GLORIA SCHNERINGER G-09-034019-A, knowing that APRIL
6 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
7 of perjury, a Fifth Annual Account and Report of Guardian, Notice of Death of Co-Guardian
8 James N. Schneringer and/or Order for Confirmation of Investing the wards Funds, in the
9 guardianship case of GLORIA SCHNERINGER G-09-034019-A, which document claimed
10 that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the
11 extent and duration claimed, which statement was material to the filing in question.

12 COUNT 152 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

13 Defendant APRIL PARKS did on or about March 23, 2015, willfully, unlawfully,
14 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
15 or recorded at Clark County District Court, to wit: a Fifth Annual Account and Report of
16 Guardian, Notice of Death of Co-Guardian James N. Schneringer and/or Order for
17 Confirmation of Investing the wards Funds, containing false statements in the guardianship
18 case of GLORIA SCHNERINGER G-09-034019-A, which instrument, if genuine, might be
19 filed, registered or recorded in a public office under any law of the State of Nevada.

20 COUNT 153 - PERJURY

21 Defendant APRIL PARKS did on or about March 6, 2015, willfully make a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
24 Report of Guardian, in the guardianship case of JANICE MITCHELL G-11-035593-A, which
25 document claimed that Defendant was owed fees for services rendered that were not in fact
26 rendered to the extent and duration claimed, which statement was material to the filing in
27 question.

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1 COUNT 154 - PERJURY

2 Defendant MARK SIMMONS did on or about March 6, 2015, suborn APRIL PARKS
3 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
4 Professional Guardian, LLC to falsify records, of the amount and value of services provided
5 in the guardianship case of JANICE MITCHELL G-11-035593-A, knowing that APRIL
6 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
7 of perjury, a Second Annual Accounting and Report of Guardian, in the guardianship case of
8 Janice Mitchell G-11-035593-A, which document claimed that APRIL PARKS was owed fees
9 for services rendered that were not in fact rendered to the extent and duration claimed, which
10 statement was material to the filing in question.

11 COUNT 155 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

12 Defendant APRIL PARKS did on or about March 6, 2015, willfully, unlawfully,
13 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
14 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
15 of Guardian, containing false statements in the guardianship case of JANICE MITCHELL G-
16 11-035593-A, which instrument, if genuine, might be filed, registered or recorded in a public
17 office under any law of the State of Nevada.

18 COUNT 156 - PERJURY

19 Defendant APRIL PARKS did on or about August 20, 2014, willfully make a false
20 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
21 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
22 and Approve Final Accounting, in the guardianship case of MARY VITEK G-12-037215-A,
23 which document claimed that Defendant was owed fees for services rendered that were not in
24 fact rendered to the extent and duration claimed, which statement was material to the filing in
25 question.

26 COUNT 157 - PERJURY

27 Defendant MARK SIMMONS did on or about August 20, 2014, suborn APRIL
28 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees

1 of A Private Professional Guardian, LLC to falsify records, of the amount and value of services
2 provided in the guardianship case of MARY VITEK G-12-037215-A, knowing that APRIL
3 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
4 of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the
5 guardianship case of MARY VITEK G-12-037215-A, which document claimed that APRIL
6 PARKS was owed fees for services rendered that were not in fact rendered to the extent and
7 duration claimed, which statement was material to the filing in question.

8 COUNT 158 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

9 Defendant APRIL PARKS did on or about August 20, 2014, willfully, unlawfully,
10 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
11 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
12 Approve Final Accounting, containing false statements in the guardianship case of MARY
13 VITEK G-12-037215-A, which instrument, if genuine, might be filed, registered or recorded
14 in a public office under any law of the State of Nevada.

15 COUNT 159 - PERJURY

16 Defendant APRIL PARKS did on or about December 18, 2014, willfully make a false
17 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
18 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
19 of Guardian, in the guardianship case of CECILIA CASS G-13-039449-A, which document
20 claimed that Defendant was owed fees for services rendered that were not in fact rendered to
21 the extent and duration claimed, which statement was material to the filing in question.

22 COUNT 160 - PERJURY

23 Defendant MARK SIMMONS did on or about December 18, 2014, suborn APRIL
24 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
25 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
26 provided in the guardianship case of CECILIA CASS G-13-039449-A, knowing that APRIL
27 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
28 of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of

1 CECILIA CASS G-13-039449-A, which document claimed that APRIL PARKS was owed
2 fees for services rendered that were not in fact rendered to the extent and duration claimed,
3 which statement was material to the filing in question.

4 COUNT 161 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

5 Defendant APRIL PARKS did on or about December 18, 2014, willfully, unlawfully,
6 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
7 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
8 Guardian, containing false statements in the guardianship case of CECILIA CASS G-13-
9 039449-A, which instrument, if genuine, might be filed, registered or recorded in a public
10 office under any law of the State of Nevada.

11 COUNT 162 - PERJURY

12 Defendant APRIL PARKS did on or about June 3, 2014, willfully make a false
13 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
14 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
15 and Approve Final Accounting, in the guardianship case of ROY CASS G-13-039443-A,
16 which document claimed that Defendant was owed fees for services rendered that were not in
17 fact rendered to the extent and duration claimed, which statement was material to the filing in
18 question.

19 COUNT 163 - PERJURY

20 Defendant MARK SIMMONS did on or about June 3, 2014, suborn APRIL PARKS to
21 commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
22 Professional Guardian, LLC to falsify records, of the amount and value of services provided
23 in the guardianship case of Roy Cass G-13-039443-A, knowing that APRIL PARKS would
24 knowingly offer for filing with the Clark County District Court, under penalty of perjury, a
25 Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case
26 of ROY CASS G-13-039443-A, which document claimed that APRIL PARKS was owed fees
27 for services rendered that were not in fact rendered to the extent and duration claimed, which
28 statement was material to the filing in question.

1 COUNT 164 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about June 3, 2014, willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
5 Approve Final Accounting, containing false statements in the guardianship case of ROY CASS
6 G-13-039443-A, which instrument, if genuine, might be filed, registered or recorded in a
7 public office under any law of the State of Nevada.

8 COUNT 165 - PERJURY

9 Defendant APRIL PARKS did on or about May 8, 2015, willfully make a false
10 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
11 Clark County District Court, under penalty of perjury, a Second and Final Account and Report
12 of Guardian, Petition for Payment of Fees, For Termination of Guardianship and To Set Aside
13 Estate without Administration, in the guardianship case of CLYDE BOWMAN 06G029707,
14 which document claimed that Defendant was owed fees for services rendered that were not in
15 fact rendered to the extent and duration claimed, which statement was material to the filing in
16 question.

17 COUNT 166 - PERJURY

18 Defendant MARK SIMMONS did on or about May 8, 2015, suborn APRIL PARKS
19 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
20 Professional Guardian, LLC to falsify records, of the amount and value of services provided
21 in the guardianship case of Clyde Bowman 06G029707, knowing that APRIL PARKS would
22 knowingly offer for filing with the Clark County District Court, under penalty of perjury, a
23 Second and Final Account and Report of Guardian, Petition for Payment of Fees, For
24 Termination of Guardianship and To Set Aside Estate without Administration, in the
25 guardianship case of CLYDE BOWMAN 06G029707, which document claimed that APRIL
26 PARKS was owed fees for services rendered that were not in fact rendered to the extent and
27 duration claimed, which statement was material to the filing in question.

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1 COUNT 167 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about May 8, 2015, willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a Second and Final Account and Report of
5 Guardian, Petition for Payment of Fees, For Termination of Guardianship and To Set Aside
6 Estate without Administration, containing false statements in the guardianship case of CLYDE
7 BOWMAN 06G029707, which instrument, if genuine, might be filed, registered or recorded
8 in a public office under any law of the State of Nevada.

9 COUNT 168 - PERJURY

10 Defendant APRIL PARKS did on or about July 22, 2013, willfully make a false
11 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
12 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
13 of Guardian, in the guardianship case of ROY FRANKLIN G-12-037404-A, which document
14 claimed that Defendant was owed fees for services rendered that were not in fact rendered to
15 the extent and duration claimed, which statement was material to the filing in question.

16 COUNT 169 - PERJURY

17 Defendant MARK SIMMONS did on or about July 22, 2013, suborn APRIL PARKS
18 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
19 Professional Guardian, LLC to falsify records, of the amount and value of services provided
20 in the guardianship case of ROY FRANKLIN G-12-037404-A, knowing that APRIL PARKS
21 would knowingly offer for filing with the Clark County District Court, under penalty of
22 perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of ROY
23 FRANKLIN G-12-037404-A, which document claimed that APRIL PARKS was owed fees
24 for services rendered that were not in fact rendered to the extent and duration claimed, which
25 statement was material to the filing in question.

26 COUNT 170 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

27 Defendant APRIL PARKS did on or about July 22, 2013, willfully, unlawfully,
28 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered

1 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
2 Guardian, containing false statements in the guardianship case of ROY FRANKLIN G-12-
3 037404-A, which instrument, if genuine, might be filed, registered or recorded in a public
4 office under any law of the State of Nevada.

5 COUNT 171 - PERJURY

6 Defendant APRIL PARKS did on or about August 20, 2014, willfully make a false
7 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
8 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
9 Report of Guardian, in the guardianship case of ROY FRANKLIN G-12-037404-A, which
10 document claimed that Defendant was owed fees for services rendered that were not in fact
11 rendered to the extent and duration claimed, which statement was material to the filing in
12 question.

13 COUNT 172 - PERJURY

14 Defendant MARK SIMMONS did on or about August 20, 2014, suborn APRIL
15 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
16 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
17 provided in the guardianship case of ROY FRANKLIN G-12-037404-A, knowing that APRIL
18 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
19 of perjury, a Second Annual Accounting and Report of Guardian, in the guardianship case of
20 ROY FRANKLIN G-12-037404-A, which document claimed that APRIL PARKS was owed
21 fees for services rendered that were not in fact rendered to the extent and duration claimed,
22 which statement was material to the filing in question.

23 COUNT 173 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

24 Defendant APRIL PARKS did on or about August 20, 2014, willfully, unlawfully,
25 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
26 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
27 of Guardian, containing false statements in the guardianship case of ROY FRANKLIN G-12-

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1 037404-A, which instrument, if genuine, might be filed, registered or recorded in a public
2 office under any law of the State of Nevada.

3 COUNT 174 - PERJURY

4 Defendant APRIL PARKS did on or about June 23, 2015, willfully make a false
5 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
6 Clark County District Court, under penalty of perjury, a Third and Final Account and Report
7 of Guardian, Petition for Payment of Fees and for Termination of Guardianship, in the
8 guardianship case of ROY FRANKLIN G-12-037404-A, which document claimed that
9 Defendant was owed fees for services rendered that were not in fact rendered to the extent and
10 duration claimed, which statement was material to the filing in question.

11 COUNT 175 - PERJURY

12 Defendant MARK SIMMONS did on or about June 23, 2015, suborn APRIL PARKS
13 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
14 Professional Guardian, LLC to falsify records, of the amount and value of services provided
15 in the guardianship case of ROY FRANKLIN G-12-037404-A, knowing that APRIL PARKS
16 would knowingly offer for filing with the Clark County District Court, under penalty of
17 perjury, a Third and Final Account and Report of Guardian, Petition for Payment of Fees and
18 for Termination of Guardianship, in the guardianship case of ROY FRANKLIN G-12-037404-
19 A, which document claimed that APRIL PARKS was owed fees for services rendered that
20 were not in fact rendered to the extent and duration claimed, which statement was material to
21 the filing in question.

22 COUNT 176 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

23 Defendant APRIL PARKS did on or about June 23, 2015, willfully, unlawfully,
24 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
25 or recorded at Clark County District Court, to wit: a Third and Final Account and Report of
26 Guardian, Petition for Payment of Fees and for Termination of Guardianship, containing false
27 statements in the guardianship case of ROY FRANKLIN G-12-037404-A, which instrument,

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1 if genuine, might be filed, registered or recorded in a public office under any law of the State
2 of Nevada.

3 COUNT 177 - PERJURY

4 Defendant APRIL PARKS did on or about March 3, 2015, willfully make a false
5 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
6 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
7 of Guardian, in the guardianship case of JUANITA GRAHAM G-13-039161-A, which
8 document claimed that Defendant was owed fees for services rendered that were not in fact
9 rendered to the extent and duration claimed, which statement was material to the filing in
10 question.

11 COUNT 178 - PERJURY

12 Defendant MARK SIMMONS did on or about March 3, 2015, suborn APRIL PARKS
13 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
14 Professional Guardian, LLC to falsify records, of the amount and value of services provided
15 in the guardianship case of JUANITA GRAHAM G-13-039161-A, knowing that APRIL
16 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
17 of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of
18 JUANITA GRAHAM G-13-039161-A, which document claimed that APRIL PARKS was
19 owed fees for services rendered that were not in fact rendered to the extent and duration
20 claimed, which statement was material to the filing in question.

21 COUNT 179 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

22 Defendant APRIL PARKS did on or about March 3, 2015, willfully, unlawfully,
23 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
24 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
25 Guardian, containing false statements in the guardianship case of JUANITA GRAHAM G-13-
26 039161-A, which instrument, if genuine, might be filed, registered or recorded in a public
27 office under any law of the State of Nevada.

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1 COUNT 180 - PERJURY

2 Defendant APRIL PARKS did on or about November 11, 2015, willfully make a false
3 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
4 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
5 Report of Guardian, in the guardianship case of JUANITA GRAHAM G-13-039161-A, which
6 document claimed that Defendant was owed fees for services rendered that were not in fact
7 rendered to the extent and duration claimed, which statement was material to the filing in
8 question.

9 COUNT 181 - PERJURY

10 Defendant MARK SIMMONS did on or about November 11, 2015, suborn APRIL
11 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
12 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
13 provided in the guardianship case of JUANITA GRAHAM G-13-039161-A, knowing that
14 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
15 penalty of perjury, a Second Annual Accounting and Report of Guardian, in the guardianship
16 case of JUANITA GRAHAM G-13-039161-A, which document claimed that APRIL PARKS
17 was owed fees for services rendered that were not in fact rendered to the extent and duration
18 claimed, which statement was material to the filing in question.

19 COUNT 182 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

20 Defendant APRIL PARKS did on or about November 11, 2015, willfully, unlawfully,
21 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
22 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
23 of Guardian, containing false statements in the guardianship case of JUANITA GRAHAM G-
24 13-039161-A, which instrument, if genuine, might be filed, registered or recorded in a public
25 office under any law of the State of Nevada.

26 COUNT 183 - PERJURY

27 Defendant APRIL PARKS did on or about November 22, 2015, willfully make a false
28 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the

1 Clark County District Court, under penalty of perjury, a First and Final Account and Report
2 of Guardian and Petition for Payment of Fees and for Termination of Guardianship, in the
3 guardianship case of YOSHIKO KINDAICHI G-13-039448-A, which document claimed that
4 Defendant was owed fees for services rendered that were not in fact rendered to the extent and
5 duration claimed, which statement was material to the filing in question.

6 COUNT 184 - PERJURY

7 Defendant MARK SIMMONS did on or about November 22, 2015, suborn APRIL
8 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
9 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
10 provided in the guardianship case of YOSHIKO KINDAICHI G-13-039448-A, knowing that
11 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
12 penalty of perjury, a First and Final Account and Report of Guardian and Petition for Payment
13 of Fees and for Termination of Guardianship, in the guardianship case of YOSHIKO
14 KINDAICHI G-13-039448-A, which document claimed that APRIL PARKS was owed fees
15 for services rendered that were not in fact rendered to the extent and duration claimed, which
16 statement was material to the filing in question.

17 COUNT 185 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

18 Defendant APRIL PARKS did on or about November 22, 2015, willfully, unlawfully,
19 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
20 or recorded at Clark County District Court, to wit: a First and Final Account and Report of
21 Guardian and Petition for Payment of Fees and for Termination of Guardianship, containing
22 false statements in the guardianship case of YOSHIKO KINDAICHI G-13-039448-A, which
23 instrument, if genuine, might be filed, registered or recorded in a public office under any law
24 of the State of Nevada.

25 COUNT 186 - PERJURY

26 Defendant APRIL PARKS did on or about August 21, 2014, willfully make a false
27 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
28 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report

1 of Guardian, in the guardianship case of WALTER WRIGHT G-11-036232-A, which
2 document claimed that Defendant was owed fees for services rendered that were not in fact
3 rendered to the extent and duration claimed, which statement was material to the filing in
4 question.

5 COUNT 187 - PERJURY

6 Defendant MARK SIMMONS did on or about August 21, 2014, suborn APRIL
7 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
8 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
9 provided in the guardianship case of WALTER WRIGHT G-11-036232-A, knowing that
10 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
11 penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship
12 case of WALTER WRIGHT G-11-036232-A, which document claimed that APRIL PARKS
13 was owed fees for services rendered that were not in fact rendered to the extent and duration
14 claimed, which statement was material to the filing in question.

15 COUNT 188 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

16 Defendant APRIL PARKS did on or about August 21, 2014, willfully, unlawfully,
17 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
18 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
19 Guardian, containing false statements in the guardianship case of WALTER WRIGHT G-11-
20 036232-A, which instrument, if genuine, might be filed, registered or recorded in a public
21 office under any law of the State of Nevada.

22 COUNT 189 - PERJURY

23 Defendant APRIL PARKS did on or about June 23, 2015, willfully make a false
24 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
25 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
26 Report of Guardian, in the guardianship case of WALTER WRIGHT G-11-036232-A, which
27 document claimed that Defendant was owed fees for services rendered that were not in fact

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1 rendered to the extent and duration claimed, which statement was material to the filing in
2 question.

3 COUNT 190 - PERJURY

4 Defendant MARK SIMMONS did on or about June 23, 2015, suborn APRIL PARKS
5 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
6 Professional Guardian, LLC to falsify records, of the amount and value of services provided
7 in the guardianship case of WALTER WRIGHT G-11-036232-A, knowing that APRIL
8 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
9 of perjury, a Second Annual Accounting and Report of Guardian, in the guardianship case of
10 WALTER WRIGHT G-11-036232-A, which document claimed that APRIL PARKS was
11 owed fees for services rendered that were not in fact rendered to the extent and duration
12 claimed, which statement was material to the filing in question.

13 COUNT 191 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

14 Defendant APRIL PARKS did on or about June 23, 2015, willfully, unlawfully,
15 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
16 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
17 of Guardian, containing false statements in the guardianship case of WALTER WRIGHT G-
18 11-036232-A, which instrument, if genuine, might be filed, registered or recorded in a public
19 office under any law of the State of Nevada.

20 COUNT 192 - PERJURY

21 Defendant APRIL PARKS did on or about August 27, 2015, willfully make a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
24 and Approve Final Accounting, in the guardianship case of WALTER WRIGHT G-11-
25 036232-A, which document claimed that Defendant was owed fees for services rendered that
26 were not in fact rendered to the extent and duration claimed, which statement was material to
27 the filing in question.

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1 COUNT 193 - PERJURY

2 Defendant MARK SIMMONS did on or about August 27, 2015, suborn APRIL
3 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
4 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
5 provided in the guardianship case of WALTER WRIGHT G-11-036232-A, knowing that
6 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
7 penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in
8 the guardianship case of WALTER WRIGHT G-11-036232-A, which document claimed that
9 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
10 and duration claimed, which statement was material to the filing in question.

11 COUNT 194 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

12 Defendant APRIL PARKS did on or about August 27, 2015, willfully, unlawfully,
13 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
14 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
15 Approve Final Accounting, containing false statements in the guardianship case of WALTER
16 WRIGHT G-11-036232-A, which instrument, if genuine, might be filed, registered or
17 recorded in a public office under any law of the State of Nevada.

18 COUNT 195 - PERJURY

19 Defendant APRIL PARKS did on or about March 3, 2015, willfully make a false
20 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
21 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
22 of Guardian, in the guardianship case of MARTHA ORNELAS G-13-039145-A, which
23 document claimed that Defendant was owed fees for services rendered that were not in fact
24 rendered to the extent and duration claimed, which statement was material to the filing in
25 question.

26 COUNT 196 - PERJURY

27 Defendant MARK SIMMONS did on or about March 3, 2015, suborn APRIL PARKS
28 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private

1 Professional Guardian, LLC to falsify records, of the amount and value of services provided
2 in the guardianship case of MARTHA ORNELAS G-13-039145-A, knowing that APRIL
3 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
4 of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of
5 MARTHA ORNELAS G-13-039145-A, which document claimed that APRIL PARKS was
6 owed fees for services rendered that were not in fact rendered to the extent and duration
7 claimed, which statement was material to the filing in question.

8 COUNT 197 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

9 Defendant APRIL PARKS did on or about March 3, 2015, willfully, unlawfully,
10 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
11 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
12 Guardian, containing false statements in the guardianship case of MARTHA ORNELAS G-
13 13-039145-A, which instrument, if genuine, might be filed, registered or recorded in a public
14 office under any law of the State of Nevada.

15 COUNT 198 - PERJURY

16 Defendant APRIL PARKS did on or about July 7, 2015, willfully make a false
17 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
18 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
19 and Approve Final Accounting, in the guardianship case of MARTHA ORNELAS G-13-
20 039145-A, which document claimed that Defendant was owed fees for services rendered that
21 were not in fact rendered to the extent and duration claimed, which statement was material to
22 the filing in question.

23 COUNT 199 - PERJURY

24 Defendant MARK SIMMONS did on or about July 7, 2015, suborn APRIL PARKS to
25 commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
26 Professional Guardian, LLC to falsify records, of the amount and value of services provided
27 in the guardianship case of MARTHA ORNELAS G-13-039145-A, knowing that APRIL
28 PARKS would knowingly offer for filing with the Clark County District Court, under penalty

1 of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the
2 guardianship case of MARTHA ORNELAS G-13-039145-A, which document claimed that
3 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
4 and duration claimed, which statement was material to the filing in question.

5 COUNT 200 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

6 Defendant APRIL PARKS did on or about July 7, 2015, willfully, unlawfully,
7 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
8 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
9 Approve Final Accounting, containing false statements in the guardianship case of MARTHA
10 ORNELAS G-13-039145-A, which instrument, if genuine, might be filed, registered or
11 recorded in a public office under any law of the State of Nevada.

12 COUNT 201 - PERJURY

13 Defendant APRIL PARKS did on or about March 31, 2015, willfully make a false
14 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
15 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
16 of Guardian, in the guardianship case of ROBERT SMITH G-14-039910-A, which document
17 claimed that Defendant was owed fees for services rendered that were not in fact rendered to
18 the extent and duration claimed, which statement was material to the filing in question.

19 COUNT 202 - PERJURY

20 Defendant MARK SIMMONS did on or about March 31, 2015, suborn APRIL PARKS
21 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
22 Professional Guardian, LLC to falsify records, of the amount and value of services provided
23 in the guardianship case of ROBERT SMITH G-14-039910-A, knowing that APRIL PARKS
24 would knowingly offer for filing with the Clark County District Court, under penalty of
25 perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of
26 ROBERT SMITH G-14-039910-A, which document claimed that APRIL PARKS was owed
27 fees for services rendered that were not in fact rendered to the extent and duration claimed,
28 which statement was material to the filing in question.

1 COUNT 203 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about March 31, 2015, willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
5 Guardian, containing false statements in the guardianship case of ROBERT SMITH G-14-
6 039910-A, which instrument, if genuine, might be filed, registered or recorded in a public
7 office under any law of the State of Nevada.

8 COUNT 204 - PERJURY

9 Defendant APRIL PARKS did on or about May 28, 2014, willfully make a false
10 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
11 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
12 and Approve Final Accounting, in the guardianship case of LARRY COBLE G-10-035166-
13 A, which document claimed that Defendant was owed fees for services rendered that were not
14 in fact rendered to the extent and duration claimed, which statement was material to the filing
15 in question.

16 COUNT 205 - PERJURY

17 Defendant MARK SIMMONS did on or about May 28, 2014, suborn APRIL PARKS
18 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
19 Professional Guardian, LLC to falsify records, of the amount and value of services provided
20 in the guardianship case of LARRY COBLE G-10-035166-A, knowing that APRIL PARKS
21 would knowingly offer for filing with the Clark County District Court, under penalty of
22 perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the
23 guardianship case of LARRY COBLE G-10-035166-A, which document claimed that APRIL
24 PARKS was owed fees for services rendered that were not in fact rendered to the extent and
25 duration claimed, which statement was material to the filing in question.

26 COUNT 206 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

27 Defendant APRIL PARKS did on or about May 28, 2014, willfully, unlawfully,
28 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered

1 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
2 Approve Final Accounting, containing false statements in the guardianship case of LARRY
3 COBLE G-10-035166-A, which instrument, if genuine, might be filed, registered or recorded
4 in a public office under any law of the State of Nevada.

5 COUNT 207 - PERJURY

6 Defendant APRIL PARKS did on or about March 15, 2016, willfully make a false
7 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
8 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
9 and Approve Final Accounting, in the guardianship case of LINDA FISHER G-14-041060-A,
10 which document claimed that Defendant was owed fees for services rendered that were not in
11 fact rendered to the extent and duration claimed, which statement was material to the filing in
12 question.

13 COUNT 208 - PERJURY

14 Defendant MARK SIMMONS did on or about March 15, 2016, suborn APRIL PARKS
15 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
16 Professional Guardian, LLC to falsify records, of the amount and value of services provided
17 in the guardianship case of LINDA FISHER G-14-041060-A, knowing that APRIL PARKS
18 would knowingly offer for filing with the Clark County District Court, under penalty of
19 perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the
20 guardianship case of LINDA FISHER G-14-041060-A, which document claimed that APRIL
21 PARKS was owed fees for services rendered that were not in fact rendered to the extent and
22 duration claimed, which statement was material to the filing in question.

23 COUNT 209 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

24 Defendant APRIL PARKS did on or about March 15, 2016, willfully, unlawfully,
25 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
26 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
27 Approve Final Accounting, containing false statements in the guardianship case of LINDA

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1 FISHER G-14-041060-A, which instrument, if genuine, might be filed, registered or recorded
2 in a public office under any law of the State of Nevada.

3 COUNT 210 - PERJURY

4 Defendant APRIL PARKS did on or about July 24, 2015, willfully make a false
5 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
6 Clark County District Court, under penalty of perjury, a First Annual Account, in the
7 guardianship case of EDWARD ATHERTON G-14-040243-A, which document claimed that
8 Defendant was owed fees for services rendered that were not in fact rendered to the extent and
9 duration claimed, which statement was material to the filing in question.

10 COUNT 211 - PERJURY

11 Defendant MARK SIMMONS did on or about July 24, 2015, suborn APRIL PARKS
12 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
13 Professional Guardian, LLC to falsify records, of the amount and value of services provided
14 in the guardianship case of EDWARD ATHERTON G-14-040243-A, knowing that APRIL
15 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
16 of perjury, a First Annual Account, in the guardianship case of EDWARD ATHERTON G-
17 14-040243-A, which document claimed that APRIL PARKS was owed fees for services
18 rendered that were not in fact rendered to the extent and duration claimed, which statement
19 was material to the filing in question.

20 COUNT 212 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

21 Defendant APRIL PARKS did on or about July 24, 2015, willfully, unlawfully,
22 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
23 or recorded at Clark County District Court, to wit: a First Annual Account, containing false
24 statements in the guardianship case of EDWARD ATHERTON G-14-040243-A, which
25 instrument, if genuine, might be filed, registered or recorded in a public office under any law
26 of the State of Nevada.

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1 COUNT 213 - PERJURY

2 Defendant APRIL PARKS did on or about February 20, 2016, willfully make a false
3 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
4 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
5 and Approve Final Accounting, in the guardianship case of EDWARD ATHERTON G-14-
6 040243-A, which document claimed that Defendant was owed fees for services rendered that
7 were not in fact rendered to the extent and duration claimed, which statement was material to
8 the filing in question.

9 COUNT 214 - PERJURY

10 Defendant MARK SIMMONS did on or about February 20, 2016, suborn APRIL
11 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
12 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
13 provided in the guardianship case of EDWARD ATHERTON G-14-040243-A, knowing that
14 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
15 penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in
16 the guardianship case of EDWARD ATHERTON G-14-040243-A, which document claimed
17 that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the
18 extent and duration claimed, which statement was material to the filing in question.

19 COUNT 215 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

20 Defendant APRIL PARKS did on or about February 20, 2016, willfully, unlawfully,
21 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
22 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
23 Approve Final Accounting, containing false statements in the guardianship case of EDWARD
24 ATHERTON G-14-040243-A, which instrument, if genuine, might be filed, registered or
25 recorded in a public office under any law of the State of Nevada.

26 COUNT 216 - PERJURY

27 Defendant APRIL PARKS did on or about May 13, 2016, willfully make a false
28 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the

1 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
2 and Approve Final Accounting, in the guardianship case of CHARLES MADDERA G-12-
3 038107-A, which document claimed that Defendant was owed fees for services rendered that
4 were not in fact rendered to the extent and duration claimed, which statement was material to
5 the filing in question.

6 COUNT 217 - PERJURY

7 Defendant MARK SIMMONS did on or about May 13, 2016, suborn APRIL PARKS
8 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
9 Professional Guardian, LLC to falsify records, of the amount and value of services provided
10 in the guardianship case of CHARLES MADDERA G-12-038107-A, knowing that APRIL
11 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
12 of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the
13 guardianship case of CHARLES MADDERA G-12-038107-A, which document claimed that
14 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
15 and duration claimed, which statement was material to the filing in question.

16 COUNT 218 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

17 Defendant APRIL PARKS did on or about May 13, 2016, willfully, unlawfully,
18 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
19 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
20 Approve Final Accounting, containing false statements in the guardianship case of CHARLES
21 MADDERA G-12-038107-A, which instrument, if genuine, might be filed, registered or
22 recorded in a public office under any law of the State of Nevada.

23 COUNT 219 - PERJURY

24 Defendant APRIL PARKS did on or about July 7, 2015, willfully make a false
25 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
26 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
27 of Guardian, in the guardianship case of REX LYONS G-14-040310-A, which document

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1 claimed that Defendant was owed fees for services rendered that were not in fact rendered to
2 the extent and duration claimed, which statement was material to the filing in question.

3 COUNT 220 - PERJURY

4 Defendant MARK SIMMONS did on or about July 7, 2015, suborn APRIL PARKS to
5 commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
6 Professional Guardian, LLC to falsify records, of the amount and value of services provided
7 in the guardianship case of REX LYONS G-14-040310-A, knowing that APRIL PARKS
8 would knowingly offer for filing with the Clark County District Court, under penalty of
9 perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of REX
10 LYONS G-14-040310-A, which document claimed that APRIL PARKS was owed fees for
11 services rendered that were not in fact rendered to the extent and duration claimed, which
12 statement was material to the filing in question.

13 COUNT 221 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

14 Defendant APRIL PARKS did on or about July 7, 2015, willfully, unlawfully,
15 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
16 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
17 Guardian, containing false statements in the guardianship case of REX LYONS G-14-040310-
18 A, which instrument, if genuine, might be filed, registered or recorded in a public office under
19 any law of the State of Nevada.

20 COUNT 222 - PERJURY

21 Defendant APRIL PARKS did on or about March 15, 2016, willfully make a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
24 and Approve Final Accounting, in the guardianship case of REX LYONS G-14-040310-A,
25 which document claimed that Defendant was owed fees for services rendered that were not in
26 fact rendered to the extent and duration claimed, which statement was material to the filing in
27 question.

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1 COUNT 223 - PERJURY

2 Defendant MARK SIMMONS did on or about March 15, 2016, suborn APRIL PARKS
3 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
4 Professional Guardian, LLC to falsify records, of the amount and value of services provided
5 in the guardianship case of REX LYONS G-14-040310-A, knowing that APRIL PARKS
6 would knowingly offer for filing with the Clark County District Court, under penalty of
7 perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the
8 guardianship case of REX LYONS G-14-040310-A, which document claimed that APRIL
9 PARKS was owed fees for services rendered that were not in fact rendered to the extent and
10 duration claimed, which statement was material to the filing in question.

11 COUNT 224 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

12 Defendant APRIL PARKS did on or about March 15, 2016, willfully, unlawfully,
13 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
14 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
15 Approve Final Accounting, containing false statements in the guardianship case of REX
16 LYONS G-14-040310-A, which instrument, if genuine, might be filed, registered or recorded
17 in a public office under any law of the State of Nevada.

18 COUNT 225 - PERJURY

19 Defendant APRIL PARKS did on or about August 13, 2014, willfully make a false
20 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
21 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
22 of Guardian, in the guardianship case of MARLENE HOMER G-12-037395-A, which
23 document claimed that Defendant was owed fees for services rendered that were not in fact
24 rendered to the extent and duration claimed, which statement was material to the filing in
25 question.

26 COUNT 226 - PERJURY

27 Defendant MARK SIMMONS did on or about August 13, 2014, suborn APRIL
28 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of

1 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
2 provided in the guardianship case of MARLENE HOMER G-12-037395-A, knowing that
3 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
4 penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship
5 case of MARLENE HOMER G-12-037395-A, which document claimed that APRIL PARKS
6 was owed fees for services rendered that were not in fact rendered to the extent and duration
7 claimed, which statement was material to the filing in question.

8 COUNT 227 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

9 Defendant APRIL PARKS did on or about August 13, 2014, willfully, unlawfully,
10 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
11 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
12 Guardian, containing false statements in the guardianship case of MARLENE HOMER G-12-
13 037395-A, which instrument, if genuine, might be filed, registered or recorded in a public
14 office under any law of the State of Nevada.

15 COUNT 228 - PERJURY

16 Defendant APRIL PARKS did on or about February 20, 2016, willfully make a false
17 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
18 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
19 and Approve Final Accounting, in the guardianship case of MARLENE HOMER G-12-
20 037395-A, which document claimed that Defendant was owed fees for services rendered that
21 were not in fact rendered to the extent and duration claimed, which statement was material to
22 the filing in question.

23 COUNT 229 - PERJURY

24 Defendant MARK SIMMONS did on or about February 20, 2016, suborn APRIL
25 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
26 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
27 provided in the guardianship case of MARLENE HOMER G-12-037395-A, knowing that
28 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under

1 penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in
2 the guardianship case of MARLENE HOMER G-12-037395-A, which document claimed that
3 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
4 and duration claimed, which statement was material to the filing in question.

5 COUNT 230 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

6 Defendant APRIL PARKS did on or about February 20, 2016, willfully, unlawfully,
7 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
8 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
9 Approve Final Accounting, containing false statements in the guardianship case of
10 MARLENE HOMER G-12-037395-A, which instrument, if genuine, might be filed, registered
11 or recorded in a public office under any law of the State of Nevada.

12 COUNT 231 - PERJURY

13 Defendant APRIL PARKS did on or about January 9, 2015, willfully make a false
14 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
15 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
16 of Guardian, in the guardianship case of MARIE LONG G-12-037438-A, which document
17 claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered
18 to the extent and duration claimed, which statement was material to the filing in question.

19 COUNT 232 - PERJURY

20 Defendant MARK SIMMONS did on or about January 9, 2015, suborn APRIL PARKS
21 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
22 Professional Guardian, LLC to falsify records, of the amount and value of services provided
23 in the guardianship case of MARIE LONG G-12-037438-A, knowing that APRIL PARKS
24 would knowingly offer for filing with the Clark County District Court, under penalty of
25 perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of
26 MARIE LONG G-12-037438-A, which document claimed that APRIL PARKS was owed fees
27 for services rendered that were not in fact rendered to the extent and duration claimed, which
28 statement was material to the filing in question.

1 COUNT 233 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about January 9, 2015, willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
5 Guardian, containing false statements in the guardianship case of MARIE LONG G-12-
6 037438-A, which instrument, if genuine, might be filed, registered or recorded in a public
7 office under any law of the State of Nevada.

8 COUNT 234 - PERJURY

9 Defendant APRIL PARKS did on or about September 29, 2015, willfully make a false
10 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
11 Clark County District Court, under penalty of perjury, a Second Annual Accounting and
12 Report of Guardian, in the guardianship case of MARIE LONG G-12-037438-A, which
13 document claimed that Defendant was owed fees for services rendered that were not in fact
14 rendered to the extent and duration claimed, which statement was material to the filing in
15 question.

16 COUNT 235 - PERJURY

17 Defendant MARK SIMMONS did on or about September 29, 2015, suborn APRIL
18 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
19 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
20 provided in the guardianship case of MARIE LONG G-12-037438-A, knowing that APRIL
21 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
22 of perjury, a Second Annual Accounting and Report of Guardian, in the guardianship case of
23 MARIE LONG G-12-037438-A, which document claimed that APRIL PARKS was owed fees
24 for services rendered that were not in fact rendered to the extent and duration claimed, which
25 statement was material to the filing in question.

26 COUNT 236 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

27 Defendant APRIL PARKS did on or about September 29, 2015, willfully, unlawfully,
28 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered

1 or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report
2 of Guardian, containing false statements in the guardianship case of MARIE LONG G-12-
3 037438-A, which instrument, if genuine, might be filed, registered or recorded in a public
4 office under any law of the State of Nevada.

5 COUNT 237 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

6 Defendant APRIL PARKS did on or about April 10, 2015, willfully, unlawfully,
7 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
8 or recorded at Clark County District Court, to wit: a First Annual Accounting, Report of
9 Guardian of Person and Estate of RUDY NORTH, and/or a Petition for Instructions and
10 Authority to Sell Coins, containing false statements in the guardianship case of RUDY
11 NORTH G-13-039133-A, which instrument, if genuine, might be filed, registered or recorded
12 in a public office under any law of the State of Nevada.

13 COUNT 238 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

14 Defendant APRIL PARKS did on or about May 8, 2015, willfully, unlawfully,
15 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
16 or recorded at Clark County District Court, to wit: an Amended First Annual Accounting of
17 Guardianship Estate of RUDY NORTH, containing false statements in the guardianship case
18 of RUDY NORTH G-13-039133-A, which instrument, if genuine, might be filed, registered
19 or recorded in a public office under any law of the State of Nevada.

20 COUNT 239 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

21 Defendant APRIL PARKS did on or about February 26, 2016, willfully, unlawfully,
22 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
23 or recorded at Clark County District Court, to wit: a Second and Final Accounting of
24 Guardianship Estate of RUDY NORTH, containing false statements in the guardianship case
25 of RUDY NORTH G-13-039133-A, which instrument, if genuine, might be filed, registered
26 or recorded in a public office under any law of the State of Nevada.

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1 COUNT 240 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about April 10, 2015, willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a First Annual Accounting, Report of
5 Guardian of Person and Estate of RENNIE NORTH, and/or Petition for Instructions and
6 Authority to Sell Coins, containing false statements in the guardianship case of RENNIE
7 NORTH G-13-039132-A, which instrument, if genuine, might be filed, registered or recorded
8 in a public office under any law of the State of Nevada.

9 COUNT 241 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

10 Defendant APRIL PARKS did on or about May 8, 2015, willfully, unlawfully,
11 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
12 or recorded at Clark County District Court, to wit: an Amended First Annual Accounting of
13 Guardianship Estate of RENNIE NORTH, containing false statements in the guardianship case
14 of RENNIE NORTH G-13-039132-A, which instrument, if genuine, might be filed, registered
15 or recorded in a public office under any law of the State of Nevada.

16 COUNT 242 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

17 Defendant APRIL PARKS did on or about February 26, 2016, willfully, unlawfully,
18 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
19 or recorded at Clark County District Court, to wit: a Second and Final Accounting of
20 Guardianship Estate of RENNIE NORTH, containing false statements in the guardianship case
21 of RENNIE NORTH G-13-039132-A, which instrument, if genuine, might be filed, registered
22 or recorded in a public office under any law of the State of Nevada.

23 COUNT 243 - PERJURY

24 Defendant APRIL PARKS did on or about August 20, 2015, willfully make a false
25 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
26 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
27 of Guardian, in the guardianship case of HAROLD LOCKWOOD G-12-037193-A, which
28 document claimed that Defendant was owed fees for services rendered that were not in fact

1 rendered to the extent and duration claimed, which statement was material to the filing in
2 question.

3 COUNT 244 - PERJURY

4 Defendant MARK SIMMONS did on or about August 20, 2015, suborn APRIL
5 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
6 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
7 provided in the guardianship case of HAROLD LOCKWOOD G-12-037193-A, knowing that
8 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
9 penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship
10 case of HAROLD LOCKWOOD G-12-037193-A, which document claimed that APRIL
11 PARKS was owed fees for services rendered that were not in fact rendered to the extent and
12 duration claimed, which statement was material to the filing in question.

13 COUNT 245 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

14 Defendant APRIL PARKS did on or about August 20, 2015, willfully, unlawfully,
15 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
16 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
17 Guardian, containing false statements in the guardianship case of HAROLD LOCKWOOD G-
18 12-037193-A, which instrument, if genuine, might be filed, registered or recorded in a public
19 office under any law of the State of Nevada.

20 COUNT 246 - PERJURY

21 Defendant APRIL PARKS did on or about December 20, 2014, willfully make a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a Petition of Guardian APRIL PARKS
24 to Withdraw and Petition for Approval of Fees and Costs, in the guardianship case of
25 NORBERT WILKENING G-13-038438-A, which document claimed that Defendant was
26 owed fees for services rendered that were not in fact rendered to the extent and duration
27 claimed, which statement was material to the filing in question.

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1 COUNT 247 - PERJURY

2 Defendant MARK SIMMONS did on or about December 20, 2014, suborn APRIL
3 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
4 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
5 provided in the guardianship case of NORBERT WILKENING G-13-038438-A, knowing that
6 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
7 penalty of perjury, a Petition of Guardian APRIL PARKS to Withdraw and Petition for
8 Approval of Fees and Costs, in the guardianship case of NORBERT WILKENING G-13-
9 038438-A, which document claimed that APRIL PARKS was owed fees for services rendered
10 that were not in fact rendered to the extent and duration claimed, which statement was material
11 to the filing in question.

12 COUNT 248 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

13 Defendant APRIL PARKS did on or about December 20, 2014, willfully, unlawfully,
14 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
15 or recorded at Clark County District Court, to wit: a Petition of Guardian APRIL PARKS to
16 Withdraw and Petition for Approval of Fees and Costs, containing false statements in the
17 guardianship case of NORBERT WILKENING G-13-038438-A, which instrument, if
18 genuine, might be filed, registered or recorded in a public office under any law of the State of
19 Nevada.

20 COUNT 249 - PERJURY

21 Defendant APRIL PARKS did on or about October 30, 2013, willfully make a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a First and Final Account and Report
24 of Guardian, Petition for Payment of Fees and For Termination of Guardianship, in the
25 guardianship case of ADOLFO GONZALEZ G-13-038316-A, which document claimed that
26 Defendant was owed fees for services rendered that were not in fact rendered to the extent and
27 duration claimed, which statement was material to the filing in question.

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1 COUNT 250 - PERJURY

2 Defendant MARK SIMMONS did on or about October 30, 2013, suborn APRIL
3 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
4 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
5 provided in the guardianship case of ADOLFO GONZALEZ G-13-038316-A, knowing that
6 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
7 penalty of perjury, a First and Final Account and Report of Guardian, Petition for Payment of
8 Fees and For Termination of Guardianship, in the guardianship case of ADOLFO
9 GONZALEZ G-13-038316-A, which document claimed that APRIL PARKS was owed fees
10 for services rendered that were not in fact rendered to the extent and duration claimed, which
11 statement was material to the filing in question.

12 COUNT 251 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

13 Defendant APRIL PARKS did on or about October 30, 2013, willfully, unlawfully,
14 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
15 or recorded at Clark County District Court, to wit: a First and Final Account and Report of
16 Guardian, Petition for Payment of Fees and For Termination of Guardianship, containing false
17 statements in the guardianship case of ADOLFO GONZALEZ G-13-038316-A, which
18 instrument, if genuine, might be filed, registered or recorded in a public office under any law
19 of the State of Nevada.

20 COUNT 252 - PERJURY

21 Defendant APRIL PARKS did on or about June 19, 2015, willfully make a false
22 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
23 Clark County District Court, under penalty of perjury, a First Annual Account, Report of
24 Guardian and Petition for Confirmation of Sale of Personal Property, in the guardianship case
25 of DELORES SMITH G-13-039454-A, which document claimed that Defendant was owed
26 fees for services rendered that were not in fact rendered to the extent and duration claimed,
27 which statement was material to the filing in question.

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1 COUNT 253 - PERJURY

2 Defendant MARK SIMMONS did on or about June 19, 2015, suborn APRIL PARKS
3 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
4 Professional Guardian, LLC to falsify records, of the amount and value of services provided
5 in the guardianship case of DELORES SMITH G-13-039454-A, knowing that APRIL PARKS
6 would knowingly offer for filing with the Clark County District Court, under penalty of
7 perjury, a First Annual Account, Report of Guardian and Petition for Confirmation of Sale of
8 Personal Property, in the guardianship case of DELORES SMITH G-13-039454-A, which
9 document claimed that APRIL PARKS was owed fees for services rendered that were not in
10 fact rendered to the extent and duration claimed, which statement was material to the filing in
11 question.

12 COUNT 254 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

13 Defendant APRIL PARKS did on or about June 19, 2015, willfully, unlawfully,
14 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
15 or recorded at Clark County District Court, to wit: a First Annual Account, Report of Guardian
16 and Petition for Confirmation of Sale of Personal Property, containing false statements in the
17 guardianship case of DELORES SMITH G-13-039454-A, which instrument, if genuine, might
18 be filed, registered or recorded in a public office under any law of the State of Nevada.

19 COUNT 255 - PERJURY

20 Defendant APRIL PARKS did on or about March 25, 2016, willfully make a false
21 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
22 Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship
23 and Approve Final Accounting, in the guardianship case of DELORES SMITH G-13-039454-
24 A, which document claimed that Defendant was owed fees for services rendered that were not
25 in fact rendered to the extent and duration claimed, which statement was material to the filing
26 in question.

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1 COUNT 256 - PERJURY

2 Defendant MARK SIMMONS did on or about March 25, 2016, suborn APRIL PARKS
3 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
4 Professional Guardian, LLC to falsify records, of the amount and value of services provided
5 in the guardianship case of DELORES SMITH G-13-039454-A, knowing that APRIL PARKS
6 would knowingly offer for filing with the Clark County District Court, under penalty of
7 perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the
8 guardianship case of DELORES SMITH G-13-039454-A, which document claimed that
9 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
10 and duration claimed, which statement was material to the filing in question.

11 COUNT 257 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

12 Defendant APRIL PARKS did on or about March 25, 2016, willfully, unlawfully,
13 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
14 or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and
15 Approve Final Accounting, containing false statements in the guardianship case of DELORES
16 SMITH G-13-039454-A, which instrument, if genuine, might be filed, registered or recorded
17 in a public office under any law of the State of Nevada.

18 COUNT 258 - PERJURY

19 Defendant APRIL PARKS did on or about July 31, 2015, willfully make a false
20 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
21 Clark County District Court, under penalty of perjury, a First and Second Annual Accounting
22 Combined and Report of Guardian, in the guardianship case of LINDA PHILLIPS G-08-
23 032515-A, which document claimed that Defendant was owed fees for services rendered that
24 were not in fact rendered to the extent and duration claimed, which statement was material to
25 the filing in question.

26 COUNT 259 - PERJURY

27 Defendant MARK SIMMONS did on or about July 31, 2015, suborn APRIL PARKS
28 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private

1 Professional Guardian, LLC to falsify records, of the amount and value of services provided
2 in the guardianship case of LINDA PHILLIPS G-08-032515-A, knowing that APRIL PARKS
3 would knowingly offer for filing with the Clark County District Court, under penalty of
4 perjury, a First and Second Annual Accounting Combined and Report of Guardian, in the
5 guardianship case of LINDA PHILLIPS G-08-032515-A, which document claimed that
6 APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent
7 and duration claimed, which statement was material to the filing in question.

8 COUNT 260 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

9 Defendant APRIL PARKS did on or about July 31, 2015, willfully, unlawfully,
10 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
11 or recorded at Clark County District Court, to wit: a First and Second Annual Accounting
12 Combined and Report of Guardian, containing false statements in the guardianship case of
13 LINDA PHILLIPS G-08-032515-A, which instrument, if genuine, might be filed, registered
14 or recorded in a public office under any law of the State of Nevada.

15 COUNT 261 - PERJURY

16 Defendant APRIL PARKS did on or about November 14, 2014, willfully make a false
17 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
18 Clark County District Court, under penalty of perjury, a Third Annual Accounting and Report
19 of Guardian, in the guardianship case of LINDA PHILLIPS G-08-032515-A, which document
20 claimed that Defendant was owed fees for services rendered that were not in fact rendered to
21 the extent and duration claimed, which statement was material to the filing in question.

22 COUNT 262 - PERJURY

23 Defendant MARK SIMMONS did on or about November 14, 2014, suborn APRIL
24 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
25 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
26 provided in the guardianship case of LINDA PHILLIPS G-08-032515-A, knowing that APRIL
27 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
28 of perjury, a Third Annual Accounting and Report of Guardian, in the guardianship case of

1 LINDA PHILLIPS G-08-032515-A, which document claimed that APRIL PARKS was owed
2 fees for services rendered that were not in fact rendered to the extent and duration claimed,
3 which statement was material to the filing in question.

4 COUNT 263 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

5 Defendant APRIL PARKS did on or about November 14, 2014, willfully, unlawfully,
6 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
7 or recorded at Clark County District Court, to wit: a Third Annual Accounting and Report of
8 Guardian, containing false statements in the guardianship case of LINDA PHILLIPS G-08-
9 032515-A, which instrument, if genuine, might be filed, registered or recorded in a public
10 office under any law of the State of Nevada.

11 COUNT 264 - PERJURY

12 Defendant APRIL PARKS did on or about July 14, 2014, willfully make a false
13 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
14 Clark County District Court, under penalty of perjury, a First Annual Accounting and Report
15 of Guardian, in the guardianship case of FRANK PAPAPIETRO G-12-037226-A, which
16 document claimed that Defendant was owed fees for services rendered that were not in fact
17 rendered to the extent and duration claimed, which statement was material to the filing in
18 question.

19 COUNT 265 - PERJURY

20 Defendant MARK SIMMONS did on or about July 14, 2014, suborn APRIL PARKS
21 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private
22 Professional Guardian, LLC to falsify records, of the amount and value of services provided
23 in the guardianship case of FRANK PAPAPIETRO G-12-037226-A, knowing that APRIL
24 PARKS would knowingly offer for filing with the Clark County District Court, under penalty
25 of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of
26 FRANK PAPAPIETRO G-12-037226-A, which document claimed that APRIL PARKS was
27 owed fees for services rendered that were not in fact rendered to the extent and duration
28 claimed, which statement was material to the filing in question.

1 COUNT 266 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

2 Defendant APRIL PARKS did on or about July 14, 2014, willfully, unlawfully,
3 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
4 or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of
5 Guardian, containing false statements in the guardianship case of FRANK PAPAPIETRO G-
6 12-037226-A, which instrument, if genuine, might be filed, registered or recorded in a public
7 office under any law of the State of Nevada.

8 COUNT 267 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

9 Defendant APRIL PARKS did on or about July 17, 2015, willfully, unlawfully,
10 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
11 or recorded at Clark County District Court, to wit: a Response to Objection to First Annual
12 Accounting and Report of Guardian and Amended First Annual Account and Report of
13 Guardian, containing false statements in the guardianship case of FRANK PAPAPIETRO G-
14 12-037226-A, which instrument, if genuine, might be filed, registered or recorded in a public
15 office under any law of the State of Nevada.

16 COUNT 268 - PERJURY

17 Defendant APRIL PARKS did on or about January 30, 2015, willfully make a false
18 statement in a declaration made under penalty of perjury, to wit: by offering for filing with the
19 Clark County District Court, under penalty of perjury, a First and Final Account and Report
20 of Guardian, Petition for Payment of Fees and Termination of Guardianship, in the
21 guardianship case of BARBARA NEELY G-14-040873-A, which document claimed that
22 Defendant was owed fees for services rendered that were not in fact rendered to the extent and
23 duration claimed, which statement was material to the filing in question.

24 COUNT 269 - PERJURY

25 Defendant MARK SIMMONS did on or about January 30, 2015, suborn APRIL
26 PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of
27 A Private Professional Guardian, LLC to falsify records, of the amount and value of services
28 provided in the guardianship case of BARBARA NEELY G-14-040873-A, knowing that

1 APRIL PARKS would knowingly offer for filing with the Clark County District Court, under
2 penalty of perjury, a First and Final Account and Report of Guardian, Petition for Payment of
3 Fees and Termination of Guardianship, in the guardianship case of BARBARA NEELY G-
4 14-040873-A, which document claimed that APRIL PARKS was owed fees for services
5 rendered that were not in fact rendered to the extent and duration claimed, which statement
6 was material to the filing in question.

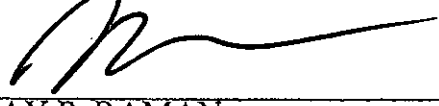
7 COUNT 270 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

8 Defendant APRIL PARKS did on or about January 30, 2015, willfully, unlawfully,
9 knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered
10 or recorded at Clark County District Court, to wit: a First and Final Account and Report of
11 Guardian, Petition for Payment of Fees and Termination of Guardianship, containing false
12 statements in the guardianship case of BARBARA NEELY G-14-040873-A, which
13 instrument, if genuine, might be filed, registered or recorded in a public office under any law
14 of the State of Nevada.

15 DATED this 7th day of March, 2017.

16 STEVEN B. WOLFSON
17 Clark County District Attorney
18 Nevada Bar #001565
19 ADAM P. LAXALT
20 Nevada Attorney General
21 Nevada Bar #012426

22 BY


23 JAY P. RAMAN
24 Chief Deputy District Attorney
25 Nevada Bar #010193

26 BY


27 DANIEL E. WESTMEYER
28 Senior Deputy Attorney General
Nevada Bar #010273

29 ENDORSEMENT: A True Bill


30 Foreperson, Clark County Grand Jury

Names of Witnesses and testifying before the Grand Jury:

BISHOP, TODD

EUGENIO, JOSEPHINE

FORD, DIANE

HAYNES, COLIN

KEILTY, EDWARD

KELLY, KAREN

KRAMER, HEIDI

LIEBO, JULIE

NORHEIM, JON

O'MALLEY, JACLYN

SANCHEZ, ANGELICA

WOODRUM, HOMA

Additional Witnesses known to the District Attorney or Attorney General at time of filing the
Indictment:

CUSTODIAN OF RECORDS, CCDC

CUSTODIAN OF RECORDS, LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS, LVMPD RECORDS

16AGJ151A-D/mc-GJ
LVMPD EV#1508192043
(TK)

IN THE SUPREME COURT OF THE STATE OF NEVADA

APRIL PARKS,

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

Supreme Court Case No. 82876

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically
with the Nevada Supreme Court on the 7th day of September, 2021.

Electronic Service of the foregoing document shall be made in accordance
with the Master Service List as follows:

Steven B. Wolfson, Clark County District Attorneys Office

Aaron Ford, Nevada Attorney General

Jamie J. Resch, Resch Law, PLLC d/b/a Conviction Solutions

By: 
Employee, Resch Law, PLLC d/b/a Conviction Solutions