

IN THE SUPREME COURT OF THE STATE OF NEVADA

No. 84612

Electronically Filed
Oct 31 2022 02:26 PM
~~Elizabeth A. Brown~~
Clerk of Supreme Court

APRIL PARKS

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Appeal from Amended Judgment of Conviction
Eighth Judicial District Court, Clark County
The Honorable Tierra Jones, District Court Judge
District Court Case No. C-17-321808-1

**APPELLANT'S APPENDIX
VOLUME I**

James A. Oronoz, Esq.
Nevada Bar No. 6769
Oronoz & Ericsson LLC
9900 Covington Cross Drive, Suite 290
Las Vegas, Nevada 89144
Telephone: (702) 878-2889
Attorney for Appellant

INDEX

<u>Volume</u>	<u>Document</u>	<u>Page No.</u>
II	Amended Indictment (Exhibit 1), filed November 5, 2018	AA 0368
III	Amended Judgment of Conviction (Plea of Guilty-Alford) filed February 4, 2019 (Case No. C-17-321808-1)	AA 0576
III	Amended Judgment of Conviction (Plea of Guilty-Alford) filed February 4, 2019 (Case No. C-18-329886-2)	AA 0579
III	Answer to Post-Conviction Petition for Writ of Habeas Corpus, filed December 31, 2020	AA 0635
IV	Appellant's Opening Brief for Case No. 82876, filed with the Supreme Court on September 7, 2021	AA 0870
V	Appellant's Reply Brief for Case No. 82876, filed with the Supreme Court on November 23, 2021	AA 1001
V	Case Appeal Statement for Case No. C-17-321808-1, filed April 22, 2022	AA 1039
IV	Case Appeal Statement, filed May 4, 2021	AA 0858
IV	Certification of Copy by Steven D. Grierson, Clerk of the Eighth Judicial District Court, dated May 6, 2021	AA 0862
IV	Court Minutes for February 22, 2021 in Case No. A-19-807564-W	AA 0783
III	Court Minutes for January 30, 2019 in Case No. C-17-321808-1	AA 0571

<u>Volume</u>	<u>Document</u>	<u>Page No.</u>
III	Court Minutes for January 4, 2019 in Case No. C-17-321808-1	AA 0566
IV	Court Minutes for March 18, 2021 in Case No. A-19-807564-W	AA 0849
IV	Court Minutes for March 29, 2021 in Case No. A-19-807564-W	AA 0850
II	Court Minutes for November 5, 2018 in Case No. C-17-321808-1	AA 0390
II	Defendant April Park's Sentencing Memorandum, filed January 2, 2019	AA 0416
IV	District Court Civil Cover Sheet for Case No. A-19-808564-W, <i>April Parks v. Dwight Neven</i> as of May 6, 2021	AA 0863
IV	Eighth Judicial District Court Case Summary for Case No. A-19-807564-W, <i>April Parks v. Dwight Neven</i> as of May 6, 2021	AA 0864
V	Eighth Judicial District Court Case Summary for Case No. C-17-321808-1 as of April 22, 2022	AA 1041
V	Findings of Fact, Conclusions of Law, and Order Granting Petition For Writ of Habeas Corpus (Post-Conviction) on April 20, 2022 (filed April 21, 2022)	AA 1032
II	Grand Jury Indictments Returned in Open Court March 8, 2017 (from Grand Jury sessions held on March 7, 2017) for Case No. C-17-321808-1 , -2, -3, -4	AA 0350
II	Guilty Plea Agreement, filed November 5, 2018	AA 0375

<u>Volume</u>	<u>Document</u>	<u>Page No.</u>
II	Indictment for April Parks, Mark Simmons, Gary Neal Taylor and Noel Palmer Simpson, filed March 8, 2017	AA 0227
III	Judgement of Conviction (Plea of Guilty- Alford), filed January 10, 2019 for Case No. C-17-321808-1	AA 0568
V	Letter from Eighth Judicial District Court to Elizabeth Brown, Clerk of Supreme Court, filed June 13, 2022, re: Case No. 84612	AA 1080
V	Notice of Appeal for Case No. C-17-321808-1, filed April 22, 2022 (filed April 26, 2022 in the Supreme Court)	AA 1072
IV	Notice of Appeal, filed with the Supreme Court on May 4, 2021	AA 0868
V	Notice of Appearance For Respondent for Supreme Court Case No. 84612, filed May 11, 2022	AA 1077
V	Notice of Appearance of Counsel, filed June 13, 2022 by James A. Oronoz, Esq.	AA 1081
V	Notice of Entry of Findings of Fact, Conclusions of Law and Order for Case No. A-19-807564-W, filed April 22, 2022	AA 1074
IV	Notice of Entry of Order Denying Petition for Writ of Habeas Corpus, filed April 15, 2021	AA 0857
V	Notice of Entry of Order for Case No. A-19-807564-W, filed April 15, 2022	AA 1031
V	Order Affirming in Part, Reversing in Part and Remanding in Case No. 82876-COA, filed March 4, 2022	AA 1018

<u>Volume</u>	<u>Document</u>	<u>Page No.</u>
IV	Order Denying Petition for Writ of Habeas Corpus, filed April 12, 2021	AA 0851
V	Order for Limited Remand for Designation of Counsel In Supreme Court Case No. 84612, filed May 6, 2022	AA 1075
III	Petition for Writ of Habeas Corpus (Post-Conviction), filed December 27, 2019	AA 0585
IV	Recorder's Transcript of Hearing Re: Petition for Writ of Habeas Corpus, dated February 22, 2021 (filed April 22, 2021)	AA 0784
IV	Recorder's Transcript of Proceedings: Evidentiary Hearing, dated March 18, 2021 (filed April 13, 2021)	AA 0797
III	Recorder's Transcript of Sentencing from January 4, 2018 (filed December 26, 2019)	AA 0443
III	Recorder's Transcript Re: Clarification of Sentence from August 26, 2019 (filed August 1, 2022)	AA 0582
II	Recorder's Transcript Re: Sentencing, dated October 5, 2018 (filed August 10, 2020)	AA 0353
III	Recorder's Transcript re: Request: Clarification of Restitution from January 30, 2019 (filed August 2, 2022)	AA 0572
V	Remittitur in Supreme Court Case No. 82876, filed April 11, 2022	AA 1030
IV	Reply to State's Response to Supplement to Petition, filed January 25, 2021	AA 0776

<u>Volume</u>	<u>Document</u>	<u>Page No.</u>
I	Reporter's Transcript of Proceedings, Grand Jury Proceedings, Vol. 1, from December 6, 2016 (filed March 13, 2017)	AA 0001
I	Reporter's Transcript of Proceedings, Grand Jury Proceedings, Vol. 7-A, from February 21, 2017 (filed March 13, 2017)	AA 0181
V	Respondent's Answering Brief for Case No. 82876, filed with the Supreme Court on November 8, 2021	AA 0942
II	State's Sentencing Memorandum, filed December 28, 2018	AA 0392
III	Supplemental Petition for Writ of Habeas Corpus (Post-Conviction), filed September 30, 2019	AA 0598
V	Transcript of Proceedings – Status Check: Appellate Counsel, filed July 12, 2022	AA 1083

12:00 1
2
3
4
12:00 5
6
7
8
9
12:00 10
11
12
13
14
12:00 15
16
17
18
19
12:00 20
21
22
23
24
12:00 25

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.)
=====)

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

12:00 1 GRAND JURORS PRESENT ON DECEMBER 6, 2016

2

3 PAUL MORTALONI, Foreperson

4 MARY ANN GOTHARD, Secretary

12:00 5 SHERRY LAYNE, Assistant Secretary

6 DAVID BAX

7 ARTHUR BYRD

8 NORMA MARTIN

9 MELVINA MISSOURI-DONOVAN

12:00 10 KATHERINE MUNIZ

11 ADRIENNE ODOGHOUE

12 JOHN ORESCHAK

13 MARRENA POUNCY

14 MICHAEL TALKINGTON

12:00 15 DIANA WILSON

16 GERALDINE WOJNAROWSKI

17 LAWRENCE WONG

18

19 Also present at the request of the Grand Jury:

12:00 20 Jay P. Raman, Chief Deputy District Attorney

21 Daniel Westmeyer, Deputy Attorney General

22

23

24

25

12:00

1

INDEX OF WITNESSES

2

Examined

3

4

KAREN KELLY

16

12:00

5

JACLYN O'MALLEY

79

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

12:00

1

INDEX OF EXHIBITS

2

3

Grand Jury ExhibitsIdentified

4

1 - PROPOSED INDICTMENT

5

12:00

5

2 - INSTRUCTIONS

6

6

4 - CHART PREPARED BY JACLYN O'MALLEY

88

7

5 - PHOTOGRAPH

89

8

6 - PHOTOGRAPH

90

9

7 - PHOTOGRAPH

90

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

12:00 1 LAS VEGAS, NEVADA, DECEMBER 6, 2016

2 * * * * *

3

4 DANETTE L. ANTONACCI,

12:00 5 having been first duly sworn to faithfully
6 and accurately transcribe the following
7 proceedings to the best of her ability.

8

9 MR. RAMAN: Good afternoon. My name is Jay

01:06 10 P. Raman. I work for the Clark County District
11 Attorney's Office. With me is Dan Westmeyer, he works
12 for the Nevada Attorney General's Office. We're jointly
13 prosecuting this case, two offices and two deputies.

14 We're presenting to you a case against

01:06 15 April Parks, Mark Simmons and Gary Neil Taylor. This is
16 case number 16AGJ151A-C. This will not be the only
17 session you hear in this case. We have multiple
18 sessions already booked and plan to present witnesses
19 and evidence in this case. I want to read to you

01:07 20 definitions on these crimes. These are not garden
21 variety every day crimes that you as a Grand Jury
22 receives so it's particularly imperative that I read to
23 you the definitions so that you can be familiar when
24 eventually you are called to deliberate on these

01:07 25 charges. These instructions are marked as Grand jury

01:07 1 Exhibit 2. Should there be a need to include any
2 further instructions they will probably be marked as 2A,
3 but currently we only have 2.

4 The charges in this case and definitions
01:07 5 corresponding start with racketeering. NRS 207.360
6 defines what crimes are related to racketeering. They
7 mean: The commission of, or attempt to commit or
8 conspiracy to commit any of the following crimes:
9 Murder; manslaughter, except for vehicular manslaughter;

01:07 10 mayhem; battery which is punished as a felony;
11 kidnapping; sexual assault; arson; robbery, taking
12 property from another under circumstances not amounting
13 to robbery; extortion; statutory sexual seduction;
14 extortionate collection of a debt; forgery; any

01:08 15 violation of 199.280 punished as a felony; burglary;
16 grand larceny; bribery or asking or receiving a bribe as
17 punished as a felony; battery with intent to commit a
18 crime; assault with a deadly weapon, any violation of
19 certain drug statutes; receiving or transferring stolen

01:08 20 vehicle; any violation of 202.260, 202.275, 202.350
21 punished as a felony; any violation of subsection 2 or 3
22 of NRS 463.330 (sic) or 465; receiving, possessing or
23 withholding stolen goods valued at \$650 or more;

24 embezzlement of money or property valued at \$650 or
01:09 25 more; obtaining possession of money or property valued

01:09 1 at \$650 or more, or obtaining a signature by means of
2 false pretenses; perjury or subornation of perjury;
3 offering false evidence. And then there's various
4 statutes that are really not applicable to our
01:09 5 presentation.

6 NRS 207.370 is definition of a criminal
7 syndicate. A criminal syndicate means any combination
8 of persons, so structured that the organization will
9 continue its operation even if individual members enter
01:09 10 or leave the organization, which engages or has the
11 purpose of engaging in racketeering activities.

12 NRS 207.380 is enterprise defined.
13 "Enterprise" includes any natural person, sole
14 proprietorship, partnership, corporation, business trust
01:09 15 or other legal entity; 2. Any union, association or
16 other group of persons associated in fact although not a
17 legal entity. This terms includes illicit as well as
18 licit enterprises and governmental as well as other
19 entities.

01:10 20 207.390, racketeering activity defined.
21 "Racketeering activity" means engaging in at least two
22 crimes related to racketeering that have the same or
23 similar pattern, intents, results, accomplices, victims
24 or methods of commission, or are otherwise interrelated
01:10 25 by distinguishing characteristics and are not isolated

01:10 1 incidents, if at least one of the incidents occurred
2 after July 1, 1983, and the last of the incidents
3 occurred within five years after a prior commission of a
4 crime related to racketeering.

01:10 5 NRS 207.400 are the unlawful acts and
6 penalties related to racketeering. It is unlawful for a
7 person: Who has with criminal intent received any
8 proceeds derived, directly or indirectly, from
9 racketeering activity to use, invest, whether directly
01:10 10 or indirectly, any part of the proceeds, or the proceeds
11 derived from the investment or use thereof, in the
12 acquisition of: (1) Any title to or any right, interest
13 or equity in any real property; or (2) Any interest in
14 or the establishment or operation of any enterprise.

01:11 15 (b) Through racketeering activity to acquire or
16 maintain, directly or indirectly, any interest or
17 control of any enterprise. (c) Who is employed by or
18 associated with any enterprise to conduct or
19 participate, directly or indirectly, in (1) The affairs
01:11 20 of the enterprise through racketeering activity; or
21 racketeering activity through the affairs of the
22 enterprise. (d) Intentionally to organize, manage,
23 direct, supervise or finance a criminal syndicate.

24 (e) Knowingly to incite or induce others to engage in
01:11 25 violence or intimidation to promote or further the

01:11 1 criminal objectives of the criminal syndicate. (f) To
2 furnish advice, assistance or direction in the conduct,
3 financing or management of the affairs of the criminal
4 syndicate with the intent to promote or further the
01:11 5 criminal objectives of the syndicate. (g) Intentionally
6 to promote or further the criminal objectives of a
7 criminal syndicate by inducing the commission of an act
8 or the omission of an act by a public officer or
9 employee which violates his official duty. (h) To
01:12 10 transport property, to attempt to transport property or
11 to provide property of another person knowing that the
12 other person intends to use the property to further
13 racketeering activity. (i) Who knows that property
14 represents proceeds of, or is directly or indirectly
01:12 15 derived from, any unlawful activity to conduct or
16 attempt to conduct any transaction involving the
17 property: (1) With the intent to further racketeering
18 activity; or (2) With the knowledge that the transaction
19 conceals the location, source, ownership or control of
01:12 20 the property. (j) To conspire to violate any of the
21 provisions of this section. 2. A person who violates
22 this is guilty of a B felony. Punishments are there in
23 the statute.
24 Regarding the definition of theft. NRS
01:13 25 205.0832. Actions which constitute theft. If a person

01:13 1 commits theft, without lawful authority, the person is
2 knowingly: (a) Controls any property of another person
3 with the intent to deprive that person of the property.
4 (b) Converts, make an unauthorized transfer of an
01:13 5 interest in, or without authorization controls any
6 property of another person, or uses the services or
7 property of another person entrusted to him or her or
8 placed in his or her possession for a limited,
9 authorized period of determined or prescribed duration
01:13 10 or for a limited use. (c) Obtains real, personal or
11 intangible property or the services of another person by
12 a material misrepresentation with intent to deprive that
13 person of the property or services. As used in this
14 paragraph, "material misrepresentation" means the use of
01:13 15 any pretense, or the making of any promise,
16 representation or statement of present, past or future
17 fact which is fraudulent and which, when used or made,
18 is instrumental in causing the wrongful control or
19 transfer of property or services. The pretense may be
01:14 20 verbal or it may be a physical act. (d) Comes into
21 control of lost, mislaid or misdelivered property of
22 another person under circumstances providing means of
23 inquiry as to the true owner and appropriates that
24 property to his or her own use. (e) Controls property
01:14 25 of another person knowing or having reason to know that

01:14 1 the property was stolen.

2 And then there are several other theories
3 that are inapplicable to our case.

4 NRS 205.0831, value. "Value" means the
01:14 5 fair market value of the property or services at the
6 time of the theft. The value of a written instrument
7 which does not have readily ascertainable market value
8 is the greater of the face amount of the instrument less
9 the portion satisfied or the amount of economic loss to
01:14 10 the owner of the instrument resulting from the
11 deprivation of the instrument. The trier of fact shall
12 determine the value of all other property whose value is
13 not readily ascertainable, and may, in making that
14 determination, consider all relevant evidence, including
01:14 15 evidence of the value of the property to its owner.

16 NRS 205.0834 regarding determination of
17 amount involved in particular theft. The amount
18 involved in a theft shall be deemed to be the highest
19 value, by any reasonable standard, of the property or
01:15 20 services which are obtained. Amounts involved in thefts
21 committed pursuant to a scheme or continuing course of
22 conduct, whether from one or more persons, may be
23 aggregated in determining the grade of the offense.

24 NRS 205.0835 gives you the statutory
01:15 25 threshold for theft. It says: If the value of the

01:15 1 property or services of the theft is less than \$650, it
2 would be a misdemeanor. If the value of the property or
3 services involved in the theft is \$650 or more but less
4 than 3500, it would be a C felony. If the value of the
01:15 5 property or services involved in the theft is \$3500 or
6 more, it would be a B felony.

7 Regarding definition for exploitation of an
8 older or vulnerable person. NRS 200.5092 defines it as:
9 3. "Exploitation" means any act taken by a person who
01:16 10 has the trust and confidence of an older person or
11 vulnerable person or by use of power of attorney or
12 guardianship of an older person or vulnerable person to:
13 (a) Obtain control, through deception, intimidation or
14 undue influence, over the older person's or vulnerable
01:16 15 person's money, assets or property with the intention of
16 permanently deprive the older person or vulnerable
17 person of the ownership, use, benefit or possession of
18 his or her money, assets or property; or (b) Convert
19 money, assets or property of the older person or
01:16 20 vulnerable person with the intent to criminally deprive
21 them, the older person or vulnerable person, of the
22 ownership, use or benefit or possession of his or her
23 money, assets or property.

24 As used in this subsection, "undue
01:16 25 influence" means the improper use of power or trust in a

01:16 1 way that deprives a person of his or her own free will
2 and substitutes the objectives of another person. The
3 term does not include the normal influence that one
4 family member has over another member of your own
01:16 5 family.

6 "Older person" means a person who is 60
7 years of age or older.

8 "Vulnerable person" means a person who is
9 18 years of age or older who: (a) Suffers from a
01:17 10 condition of physical or mental incapacitation because
11 of a developmental disability, organic brain damage, or
12 mental illness; or (b) Has one or more physical or
13 mental limitations that restrict the ability of the
14 person to perform the normal activities of daily living.

01:17 15 NRS 200.5099 includes the penalties, but it
16 also provides the statutory thresholds. If the
17 exploitation involves an amount less than \$650, it is a
18 gross misdemeanor. If it is at least \$650 but less than
19 \$5,000, it is a B felony. And if it is more than \$5,000
01:17 20 it is also a B felony.

21 Offering false instrument for filing or
22 record. NRS 239.330. Offering false instrument for
23 filing or record. A person knowingly procures or offers
24 any false or forged instrument to be filed, registered
01:18 25 or recorded in any public office, which instrument, if

01:18 1 genuine, might be filed, registered or recorded in a
2 public office under any law of this State or of the
3 United States, would be guilty of a C felony.

4 Regarding perjury. NRS 199.145. Statement
01:18 5 made in declaration under penalty of perjury. A person
6 who, in a declaration made under penalty of perjury:

7 1. Makes a willful and false statement in a matter
8 material to the issue or point in question; or
9 2. Willfully makes an unqualified statement of that
01:18 10 which the person does not know to be true, or suborns
11 another to make such a declaration a statement of the
12 kind described in subsection 1 or 2, is guilty of
13 perjury or subornation of perjury, as the case may be,
14 which is a D felony.

01:19 15 That's it. Does anybody have any questions
16 about these statutes at this point? No?

17 Our first witness is going to be Karen
18 Kelly.

19 Just before we get started, I just wanted
01:19 20 to make sure, because this is quite a lengthy case, does
21 anyone believe they might have a conflict in this case?
22 Does anyone know of the parties listed in the
23 Indictment?

24 THE FOREPERSON: Please raise your right
01:20 25 hand.

01:20 1 You do solemnly swear the testimony you are
2 about to give upon the investigation now pending before
3 this Grand Jury shall be the truth, the whole truth, and
4 nothing but the truth, so help you God?

01:20 5 THE WITNESS: I do.

6 THE FOREPERSON: Thank you.

7 You are advised that you are here today to
8 give testimony in the investigation pertaining to the
9 offenses of racketeering, theft, exploitation of an
01:20 10 older person, offering false instrument for filing or
11 record, and perjury, involving April Parks, Mark Simmons
12 and Gary Taylor.

13 Do you understand this advisement?

14 THE WITNESS: I do.

01:20 15 THE FOREPERSON: Please state your first
16 and last name and spell both for the record.

17 THE WITNESS: My name is Karen Kelly.

18 K-A-R-E-N, K-E-L-L-Y.

19 MR. RAMAN: Okay. And just for the record,
01:20 20 I did poll the Grand Jury about any potential people who
21 think they might have conflicts and at this point there
22 was no response. I know it's quite a lengthy document.
23 Should you believe you know any of the parties in this
24 case please bring that to one of the prosecutors
01:21 25 attention should that be a matter.

01:21 1 KAREN KELLY,
2 having been first duly sworn by the Foreperson of the
3 Grand Jury to testify to the truth, the whole truth,
4 and nothing but the truth, testified as follows:

01:21 5
6 EXAMINATION

8 BY MR. RAMAN:

9 Q. Miss Kelly, what do you do for a living?

01:21 10 A. I'm currently the acting Clark County
11 Public Guardian.

12 Q. And how long have you been the acting Clark
13 County Public Guardian?

14 A. Since August 5th of 2016.

01:21 15 Q. And were you employed by the Clark County
16 Public Guardian's Office prior to August 5th?

17 A. Correct, I have been there since July of
18 2008.

01:21 19 Q. Prior to being the acting Public Guardian
20 what was your job title?

21 A. I was previously a supervisor within the
22 office and prior to that a case manager.

23 Q. What exactly is guardianship?

01:21 24 A. Guardianship is a court appointed process
25 where a person is deemed to be incompetent or incapable

01:21 1 of making their own decisions and a person is appointed
2 by the court to make those decisions for them. It could
3 either be decisions with regard to their person or
4 decisions regarding their estate or both person and
01:22 5 estate.

6 Q. Why would somebody need to have a
7 guardianship?

8 A. Quite often it's a medical reason, there's
9 been some kind of medical episode that has left someone
01:22 10 incapable of making decisions for themselves. Sometimes
11 it can be from birth with an intellectual disability or
12 later on with a cognitive disability, but sometimes it's
13 the result of an accident or something like that.

14 Q. Are there guardianships for children?

01:22 15 A. There are. Minors can be under
16 guardianship as well. The Public Guardian's Office
17 doesn't currently serve in that role, only for estates
18 for minors.

19 Q. What types of -- you said Public
01:22 20 Guardianship Office does not really deal with minors.
21 What types of adults do you as a guardian normally
22 service?

23 A. We become the guardian for adults over the
24 age of 18 who have a cognitive impairment as deemed that
01:23 25 way by a physician. So we have to have some kind of

01:23 1 medical documentation stating what the cognitive
2 disability is and we have clients that range like I said
3 from 18 all the way up to plus a hundred. The minors
4 that we have become the guardian for, we only handle
01:23 5 some money, so say they had some kind of payout or
6 something, we would handle just the financial side.

7 Q. Okay. Just to try to get an idea of what
8 might get somebody into a guardianship who was obviously
9 over the age of 18.

01:23 10 A. Yeah.

11 Q. Somebody who is not elderly who is over the
12 age of 18 and your office may be the guardian for, what
13 is a common ailment, physical or mental handicap of some
14 sort, that might get somebody into guardianship that
01:24 15 you've seen?

16 A. Intellectual disability or a traumatic
17 brain injury.

18 Q. And then regarding the elderly, is there
19 any prominent or common deficit that maybe gets somebody
01:24 20 that you've seen into guardianship?

21 A. Yeah. We often see dementia, Alzheimer's,
22 we'll sometimes get some Huntington's diagnoses,
23 strokes, some people after they've had a stroke will
24 have some problems with their impairment, those are
01:24 25 kinds of the major ones that we see.

01:24 1 Q. Are there, regarding being a guardian, is
2 there any qualifications to become a guardian over
3 another person?

01:24 4 A. The qualifications currently in the State
5 of Nevada is that you have to be an adult who hasn't
6 been deemed incompetent yourself, you can't have been
7 convicted of a felony, had a bankruptcy in the last
8 seven years, and the other one is -- I'm sorry, I'm
9 thinking about the difference between the families and
01:25 10 the privates. I think that's the main -- and to reside
11 in the State of Nevada without having to have someone
12 serve with you or have a resident agent appointed for
13 you.

01:25 14 Q. Would a person applying for guardianship be
15 approved if they had allegations of abuse or
16 exploitation against the person or even another
17 unrelated person?

18 A. No, they would not.

01:25 19 Q. Is there any additional -- so that's the
20 general requirement to be a guardian. Check those
21 boxes. You're not incompetent, you're an adult
22 yourself, you've had no bankruptcies in the last -- did
23 you say seven years?

24 A. Seven years, yes.

01:25 25 Q. And you don't have any kind of record of

01:25 1 abuse or exploitation?

2 A. Yeah, no felonies.

3 Q. No felonies.

4 A. Uh-huh.

01:25 5 Q. Is there any additional requirements for
6 something, a person who serves in the capacity known as
7 a private professional guardian?

8 A. Yeah, currently if you are the guardian for
9 three or more wards who you're not related to by blood,
01:26 10 there is a requirement to be certified through the
11 Center for Guardianship Certification and also more
12 recently the legislature passed some laws regarding
13 licensure and those are coming into play at this point.

14 Q. And regarding the term ward, is that a term
01:26 15 used for a person who has a guardianship or --

16 A. It is. Ward is someone who's had a
17 guardianship placed on them by the court.

18 Q. Okay. Is there any particular
19 qualifications to work for your office as a guardian,
01:26 20 the Public Guardian's Office?

21 A. Yes. To become a case agent with the Clark
22 County Public Guardian's Office we do require a
23 Bachelor's degree, in addition to seeking the
24 guardianship certification within one year of becoming a
01:26 25 case manager.

01:26 1 Q. So you mentioned the educational
2 requirement of having a Bachelor's degree regarding the
3 Public Guardian's Office. Is there any minimal
4 educational requirement for anybody who serves as a
01:27 5 guardian or a private professional guardian?

6 A. No, there's not.

7 Q. Not even a high school diploma?

8 A. It's nothing in the statutes.

9 Q. Okay. What kind of powers does having
01:27 10 guardianship over another human being give the guardian?

11 A. They're granted a lot of powers. If you're
12 granted guardianship of the person you're going to be
13 making decisions on where someone can reside based on
14 their level of care, making sure they attend all their
01:27 15 medical appointments, you're going to be making medical
16 decisions, making sure they're getting, if they need
17 surgery you're giving consent for medical procedures,
18 and if you're guardian over the estate you're handling
19 all their money, all their income will come to you, you
01:27 20 need to ensure their bills are being paid, you'll have
21 access to the bank accounts, you'll have access to all
22 their investments, any other assets in their name, real
23 property, anything like that, you're going to be
24 responsible for and have access to.

01:28 25 Q. Okay. You mentioned having guardianship

01:28 1 over one's estate. Are there various types of
2 guardianship?

3 A. There are. You can be the guardian of the
4 person only, so you only make the medical decisions.

01:28 5 You can be guardian of the estate only where you only
6 have the ability to make decisions over the finances.

7 You can be over both. There's also limited
8 guardianships that the court can impose if there's just

9 a real specific reason that somebody may just need a
01:28 10 guardianship for one small area of their life and there

11 is also temporary guardianships.

12 Q. When somebody has guardianship over the
13 person and the estate, is there a common term in your
14 profession that that's called, having both?

01:28 15 A. No. Usually we'll say guardianship of
16 person and estate and the letters of guardianship will
17 indicate both of them.

18 Q. Does a guardian have a fiduciary duty to
19 the ward or wards that they are appointed for?

01:29 20 A. Yes. If they're guardian, if they're
21 appointed guardian of the estate you do have a fiduciary
22 duty to manage the income of the ward, pay all the
23 bills, make sure that their estate is being managed
24 appropriately and for their benefit.

01:29 25 Q. And what exactly is fiduciary duty in

01:29 1 general?

2 A. The ability to receive income and manage
3 that income. So you apply to become the fiduciary of
4 somebody's pension, their social security, anything like
01:29 5 that. Another term often used is representative payee,
6 that's kind of similar to a fiduciary.

7 Q. Okay. When somebody takes over another
8 person's finances as their guardian, is there any
9 requirements that they account for all the property they
01:29 10 have or their income or anything like that?

11 A. There is. Once you're appointed as the
12 general guardian of someone's estate, the court requires
13 that you file an inventory of all their assets that
14 you're aware of at that time within 60 days of
01:30 15 appointment. So you'll file, if they have a home you'll
16 try to find out how much the home is worth, if there's
17 any encumbrances such as a mortgage, you want to look at
18 all their personal property, have that inventoried and
19 appraised and report that to the court. Bank accounts,
01:30 20 investments, anything that is an asset for this
21 particular person's estate needs to be reported in that
22 inventory if you're currently aware of it.

23 Q. What about property where maybe it's hard
24 to determine what the value is? For example, a person
01:30 25 who's going to be under guardianship has paintings in

01:30 1 the house that is hanging on the walls and they look
2 like they might be valuable, what do you do in a
3 circumstance like that?

4 A. We would actually hire a certified
01:31 5 appraiser to come in and review the property within the
6 home and to provide their expert opinion on how much
7 that property would be worth.

8 Q. If somebody is seeking guardianship, is
9 there any, so I mean you have people who may have a lot
01:31 10 of belongings and income and money in the bank, then you
11 have some people who really don't, they have a lot less,
12 is there any kind of revision as to reporting
13 requirements for size of estate?

14 A. There is. Currently within the State of
01:31 15 Nevada they kind of split it into two different
16 categories. A summary guardianship is a guardianship
17 where all of the assets at any given time are less than
18 \$10,000. If the estate's assets are less than \$10,000
19 the requirement for an annual accounting to the court is
01:32 20 waived so you don't have to annually account for what
21 you're doing within that guardianship. You are still
22 required at the termination of the guardianship to
23 provide an accounting for all the years you were
24 guardian. So say you were guardian for five years,
01:32 25 you'd still have to show what you did with that money

01:32 1 for five years, but you're not showing the court each
2 year what you've done with it. If the estate has more
3 than \$10,000 there is an annual accounting requirement
4 that must be filed within 60 days of your appointment,
01:32 5 of your appointment of general guardian each year.

6 Q. Now just to try to figure out whether this
7 would be a summary or not a summary. Let's say you have
8 a ward who does not own their own home, they rent,
9 vehicle is probably paid off but it's not worth much of
01:32 10 anything, they receive 2,000 a month from Social
11 Security or pension, so that equals an income of 24,000,
12 but it pretty much pays out their rent and medical
13 expenses, is that a summary or is that an annual
14 accounting?

01:33 15 A. That would be a summary accounting. If,
16 basically within that calendar month, if the money comes
17 in and then most of it goes out and your assets don't
18 exceed \$10,000 within that month, that would be
19 considered a summary accounting.

01:33 20 Q. Okay. So I as a ward could have 24,000
21 coming in every year but I'm still in a summary?

22 A. Correct.

23 Q. What court does a person apply for
24 guardianship in?

01:33 25 A. The District Court here in Clark County

01:33 1 located at the Family Court at the corner of Pecos and
2 Bonanza. It's 601 North Pecos.

3 Q. What kind of evidence do you need to
4 submit, like what is the process, I want to get
01:33 5 guardianship over my mom, what do I need to provide to
6 the court?

7 A. You'll provide a petition to the court that
8 also includes some medical documentation explaining to
9 the court what the cognitive impairment of the proposed
01:34 10 ward is. Within the petition you'll need to state the
11 name of the petitioner and show that they do meet the
12 criteria to become the guardian here in the State of
13 Nevada, the name of the proposed ward, where the
14 proposed ward is currently living, who's currently
01:34 15 taking care of the proposed ward. They usually want a
16 little bit of information of the circumstances leading
17 up to the guardianship and then they also want to make
18 sure that any family members within two degrees of
19 relation of the proposed ward have been noticed of this
01:34 20 petition, that you're trying to gain guardianship, and
21 that you have mailed them the appropriate documents and
22 let them know of any upcoming hearings.

23 Q. Let's explore that two degrees real quick.
24 So if I'm trying to seek guardianship on my mom, do I
01:34 25 have to notify my brother and sister that I intend to do

01:34 1 so?

2 A. You do. You have to notify the proposed
3 ward themselves. You'll have to notify any parents of
4 theirs that are still alive and any grandparents as
01:35 5 well. You'll have to notice any siblings and if they
6 have any children or grandchildren, all of those people
7 will need to be noticed. That's what is considered
8 within the two degrees of relation.

9 Q. Okay. So up to grandparents and down to
01:35 10 grandchildren?

11 A. Correct.

12 Q. Does it extend to cousins or nieces?

13 A. It does not. It doesn't mean you can't
14 notice them if that's the only family member, but
01:35 15 statutorily you only have to notice people within the
16 two degrees.

17 Q. Let's say it's not my mom but my neighbor
18 that I'm trying to seek guardianship for, do I have some
19 duty to try to figure out who their relations within two
01:35 20 degrees are?

21 A. You do. And you have to notify the court
22 of what actions you've taken to try and locate family,
23 whether it be talking to the proposed ward if they
24 remember, doing searches, hiring air search companies,
01:36 25 whatever it is you're doing, yes, you're going to have

01:36 1 to show them you're doing something to try and locate
2 those family members.

3 Q. The notice to the family members, does it
4 have to be done by any special mailing, like certified,
01:36 5 anything like that?

6 A. The initial notice of hearing for the
7 guardianship has to be certified return receipt mail, so
8 you get those little green cards back, that's how they
9 prefer that to be done, yes.

01:36 10 Q. Is there some kind of doctor certificate
11 with that usually if it's for, I guess in either
12 situation, a person or estate, right?

13 A. Yeah. There is a form called a certificate
14 of incapacity that the courts use and are available on
01:36 15 their websites that lists out the name of the doctor
16 completing it, what the cognitive disability is, what
17 level of care, you know, if someone's able to live
18 independently or not. It will also say if they're an
19 immediate risk of financial exploitation, if they need
01:36 20 immediate medical attention, and then finally it will
21 say in this doctor's opinion if this person needs
22 guardianship of just their person, their person and
23 estate, or just estate only. The court has accepted
24 written statements from doctors but generally the
01:37 25 certificate of incapacity is what's used to obtain

01:37 1 guardianship.

2 Q. Okay. Is the person's appearance
3 necessary? So again going back to the mom illustration.
4 Does my mom need to be in court if I'm seeking a
01:37 5 guardianship for her on the date that the judge is going
6 to hear about that guardianship?

7 A. Yes, the judge does require that a proposed
8 ward be present in court. However, there are
9 circumstances when that's not possible and so a doctor
01:37 10 can actually excuse the ward's presence at the hearing.
11 There is a little part of the certificate of incapacity
12 that indicates if the proposed ward would be able to
13 attend the hearing, it will also state if their
14 condition is such that they wouldn't even comprehend the
01:38 15 hearing, and there is a little box that says it would be
16 detrimental for that person to attend. Maybe there is a
17 medical condition, they're in the hospital at this time,
18 it's just not in their best interest, but a doctor has
19 to waive that, a person's appearance.

01:38 20 Q. Okay. What is the difference between the
21 public guardian and a private guardian?

22 A. The Public Guardian's Office, we are a
23 government agency. All of the case managers that work
24 within the office just receive a salary from Clark
01:38 25 County for our work. A private professional guardian

01:38 1 is, it's a for profit business and that's their job and
2 they live off of the fees that are generated. The Clark
3 County Public Guardian's Office does also generate fees
4 based on the work that's done, however if there are no
01:38 5 funds to pay then we don't retrieve any funds from those
6 estates. Any money we do receive goes straight back to
7 the Clark County General Fund.

8 Q. Is there a fee schedule for your office's
9 services to wards?

01:39 10 A. There is. The Clark County commissioners
11 set the fee schedule for our office and it's based on
12 the overhead of our office. They look at it year to
13 year, based on what the overhead was the previous year,
14 how many people we have within the office, and then
01:39 15 they'll set an hourly rate for all the people within our
16 office.

17 Q. What are those rates if you recall?

18 A. I actually have a list here. Can I just
19 look at those?

01:39 20 Q. Sure.

21 A. So actually the ones for fiscal year 2017
22 which we're currently in, the Public Guardian, which
23 would be myself at this point, the billing rate is \$235
24 an hour, and for a case manager it's \$95 per hour. What
01:39 25 I can tell you is within the office I very rarely bill

01:39 1 within a case, that's mainly the case management at the
2 \$95 per hour, and we do require that they do minute
3 billing. So if they only spend five minutes on a case
4 you only bill for five minutes. There is no block
01:40 5 billing within the office.

6 Q. Okay. So if the case manager charges \$95
7 per hour and the task takes five minutes, the \$95
8 represents one hour, you would divide it by whatever
9 that ratio is to come up with what the five minutes
01:40 10 cost?

11 A. Correct.

12 Q. And that is billed to the ward out of
13 whatever finances they have?

14 A. Yes. If they have the finances. If we're
01:40 15 doing an annual accounting to the court we would request
16 at that time for the court to review our fees, see if
17 they're appropriate, and if they approve the fees we can
18 then take the fees out of that estate, if the estate is
19 solvent and there are fees and funds to be able to pay
01:40 20 that. And then of course if there are no fees, I'm
21 sorry, if there's no funds available we don't take any
22 fees on those cases. They're generally like Medicaid
23 cases which makes up about 70 percent of our cases right
24 now.

01:40 25 Q. Why do we have a public guardian if there

01:41 1 are others who can do guardianship duties?

2 A. There is something in the statute that says
3 if there's over 100,000 people within the county that
4 there needs to be a public guardian, but often the
01:41 5 public guardian acts in a role where if there are no
6 family members or there's no appropriate family members,
7 say someone is being exploited by a family member or a
8 friend, and there's no one else who's willing or able to
9 serve, then we can step into that role for that person.

01:41 10 Q. What level of contact does a guardian have
11 with a ward that's been appointed to them? Is there a
12 frequency, is there an amount of, you know, face time?

13 A. Yes. We require, within the Public
14 Guardian's Office we require, if we're guardian of the
01:41 15 person, we must have face-to-face contact at least once
16 a month. If we're guardian of the estate only, we'll
17 have face-to-face contact quarterly. However throughout
18 the month we'll get phone calls from caregivers or
19 wherever someone's living, so you'll have other
01:42 20 contacts, but face to face for guardianship of the
21 person, it's one time per month.

22 Q. Is that in any kind of standards or
23 statutes?

24 A. Within the Nevada Guardianship, I'm sorry,
01:42 25 the National Guardianship Association standards there is

01:42 1 a standard of having one visit per month for
2 guardianship.

3 Q. And can you generally explain what the
4 National Guardianship standards are? Is that a set of
01:42 5 rules or guidelines?

6 A. It is a set of guidelines that guardians
7 across the country look to as standards of practice for
8 their guardianship businesses and it gives you some
9 ideas of the things you really should and shouldn't do
01:42 10 as a guardian.

11 Q. So if somebody is appointed as guardian for
12 a ward, how do they show the bank or the doctor or
13 whomever they need to deal with that you're this
14 person's guardian and you step into their shoes for the
01:43 15 purpose of paying their bills or getting medical testing
16 done or whatever the guardian needs to do, how do you
17 show that person that you have authority to do this?

18 A. The first thing we'll get once the
19 guardianship is approved is we'll get an order from the
01:43 20 court that appoints the guardian and it will indicate
21 what kind of guardianship, person and estate or
22 whichever, and then once we have an order then we'll
23 have letters of guardianship issued and those letters
24 are generally what we'll use with medical companies,
01:43 25 hospitals and things like that, but often the banks will

01:43 1 require orders giving specific instructions to close an
2 account or really delineating what we can and can't do
3 with regard to the finances.

4 Q. When somebody first becomes guardian over a
01:43 5 ward, is there anything done with their existing bank
6 accounts?

7 A. For the Public Guardian's Office we'll go
8 out and close that account. We want to make sure that
9 all the money is protected or into their account that's
01:44 10 then held within the Clark County Public Guardian's
11 Office bank account and even though it's its own
12 separate account for that person. I know for family
13 guardians and for private professional guardians there's
14 often, they'll keep maybe a bank account at the current
01:44 15 bank but maybe change it into their name, so it still
16 may be at Bank of America but it's a new account in the
17 name of the guardianship, and then sometimes there's
18 also a blocked account that's needed to be able for
19 money to go into that account and be safe and then it
01:44 20 pours over monthly into an account the guardian has
21 access to.

22 Q. So once that guardianship bank account has
23 been created, does the ward or person who really owns
24 that money, do they have access to that money anymore?

01:44 25 A. No, not once the guardianship account has

01:44 1 been established.

2 Q. So the guardian has complete control of the
3 money that comes in and sits in that account?

4 A. Yes, and they are responsible for what
01:45 5 happens to that money.

6 Q. Why is that required? Why does one have to
7 convert the existing bank account into a guardianship
8 account? Is there a reason for that or a benefit to
9 anybody?

01:45 10 A. It's somewhat of a protection for the
11 guardian. If they're the ones that are responsible for
12 the money they need to make sure nobody else has access
13 to it so that they can make sure the bills are going out
14 and that the ward receives the money that is part of
01:45 15 their budget for the month. So it's usually more of a
16 protection so we can report to the court exactly what's
17 happened to that money and nobody else has access to it.

18 Q. What exactly is a block account that you
19 mentioned?

01:45 20 A. The court with some family guardians or
21 private professional guardians will sometimes require
22 that a blocked account is set up and that often has a
23 portion of money in it, the income goes into that
24 account each month and the guardian has had a budget
01:46 25 approved by the judge of how much can come out each

01:46 1 month. So they looked and they looked at how much their
2 rent is, room and board, whatever they're looking at,
3 food, personal needs money, however much money they'll
4 need, and that money will come out of the blocked
01:46 5 account each month into an account that they can write
6 checks off of or access for cash, but the main money
7 that's in that blocked account is protected and safe and
8 nobody can access it without another court order.

9 Q. Is there a necessity for any kind of
01:46 10 bonding?

11 A. There is -- a bond can be ordered by a
12 judge. The bonds are often not used for family member
13 guardians, but a bond can be used for private
14 professionals if the court orders it and that bond would
01:46 15 then be a protection, if they used the money
16 inappropriately, the ward themselves or a family member
17 could make a claim against that bond.

18 Q. So a bond is kind of like insurance?

19 A. Somewhat, yes.

01:47 20 Q. Is there, we know that if you get
21 guardianship over somebody you have a significant amount
22 of power over medical decisions if you have a person
23 guardianship or financial decisions if you're over the
24 estate. Is there anything that, even if you have those
01:47 25 powers as the guardian, you still need to ask the court

01:47 1 to do before you do it?

2 A. There is quite a lot of things you'd have
3 to ask the court for. If you're guardian of the person,
4 if you want to move someone into a secured facility, so
01:47 5 say the doctors or someone is saying that they're a risk
6 to wander off, if you don't have a signed order from a
7 doctor explaining why, you'll have to go to court to get
8 permission to put somebody in a locked facility. For
9 some medical procedures such as sterilization, any kind
01:48 10 of research or experimental drugs or anything like that
11 that a doctor might suggest the ward would benefit from,
12 you need court permission for any of that on the
13 guardian of the person's side.

14 On the guardian of the estate side, when
01:48 15 you're managing their money, there is quite a lot of
16 things that you have to go to court to get additional
17 powers to do. So say the ward said to you they wanted
18 to change their will or who they're leaving their money
19 to, you have to go back to the court and let them know
01:48 20 that, you as the guardian can't just do that, you can't
21 just go in and say I'm changing the beneficiaries, I
22 want to change the will, I'm changing all the stuff from
23 their estate plan. You need court permission to do
24 that. In addition you need court permission to list a
01:48 25 real property for sale and once you get an offer you

01:48 1 need confirmation of the sale of that property. You
2 need permission to invest monies of the ward in kind of
3 high risk investments, in stocks and bonds and anything
4 like that. If it's just FDIC insured bank account you
01:49 5 don't need specific power for that. But any kind of
6 investment you need powers for that. You'll need powers
7 to change any power, uh, payable on death beneficiaries
8 on a bank account, you'll need special permission for
9 that. Gosh, there's quite a few different ones. Can I
01:49 10 just look at my information real quick?

11 Q. Yes. Can you sell a vehicle that belongs
12 to a ward?

13 A. You can if you have language in your
14 original order that gives you permission to sell
01:49 15 personal property, as long as you do the requirement of
16 putting it in the paper, the noticing requirement that
17 you're selling this person's property, you can do that
18 if you have initial language in your order that allows
19 you to sell personal property.

01:50 20 Q. Can you settle somebody's lawsuit?

21 A. No. If there is an outstanding lawsuit
22 you'll have to get permission if you want to initiate it
23 or if a settlement offer does come back you'll need to
24 get permission from the court to settle that lawsuit.

01:50 25 Q. Feel free to look at your list if there's

01:50 1 anything that we missed.

2 A. Oh. It also said if you wanted to act as a
3 trustee under any, if there's a trust out there, you'll
4 need court permission to do that.

01:50 5 Yeah, I think we got it all.

6 Q. Okay. So should a guardian do any of those
7 activities without court permission, that would be
8 wrong, that would be against either the NJ standards or
9 the statutes?

01:51 10 A. Correct.

11 Q. If it requires court permission it's
12 probably a statutory violation?

13 A. Yes.

14 Q. How many people, can somebody be guardian
01:51 15 for, I know you said that if you supervise three or more
16 wards you're now a private professional guardian, but is
17 there some limit to how many people a guardian can
18 supervise?

19 A. There is no actual number limit of how many
01:51 20 people you can supervise. You really have to gauge it
21 on how much care you can give to each case and know that
22 you can, you have the right amount of people to do it.
23 Currently at Public Guardian's Office we have about 400
24 cases, but we have about eight case managers that that's
01:51 25 spread throughout, and as long as they can do their

01:51 1 visits every month and you can adequately get to all the
2 tasks you need to within a month, then that, that's the
3 amount of people that you should have on your caseload,
4 but there is no specific number, no.

01:51 5 Q. Are you aware of how many people in Clark
6 County are under a guardianship generally?

7 A. I think the last numbers we had was at
8 least over 2300 I believe within the District Court. In
9 Clark County.

01:52 10 Q. Who is in charge of the guardianship court?

11 A. Currently Judge Cynthia Dianne Steel
12 provides over the guardianship.

13 Q. Is she a recent change in judicial officer?

14 A. Yeah, I think she's be there about a year
01:52 15 and a half now.

16 Q. And who was in charge of the guardianship
17 before that?

18 A. It was hearing master John Norheim.

19 Q. And given that he has the title of hearing
01:52 20 master, he's not a judge?

21 A. That's correct.

22 Q. So he was hired to do a specific job which
23 was to be in charge of guardianship court like a judge?

24 A. Yes.

01:52 25 Q. Given that he's not a judge, was there a

01:52 1 judge supervising him?

2 A. Yes, Judge Hoskins.

3 Q. Is that Charles Hoskins?

4 A. Yes.

01:52 5 Q. Does the court have any kind of set up to
6 monitor or investigate guardians to make sure they're
7 not stealing from their clients or abusing them?

8 A. There is a system. There's a guardianship
9 compliance officer. Within the last year and a half

01:53 10 they've added more compliance officers to the
11 guardianship and so we've seen a lot more compliance
12 letters come out and a lot more cases being brought back
13 into court for noncompliance than we ever had previously
14 when they only had one compliance officer.

01:53 15 Q. Okay. In your experience if, I'm trying to
16 understand the circumstances. You have a person who is
17 the ward.

18 A. Yes.

19 Q. And you have a person who is appointed as
01:53 20 the guardian. If that ward really has nobody else in
21 their life and they are maybe in a condition where
22 they're either not to believe or cannot communicate
23 well, is there anyone there for them that says hey, my
24 guardianship is doing something bad to me?

01:54 25 A. Not really. If they have an attorney that

01:54 1 is appointed for them, which really wasn't something
2 that was part of the every day part of guardianship
3 until recently, within the last year or so more
4 attorneys are being appointed for wards, before that it
01:54 5 may have been someone in the facility like a social
6 worker or someone like that they may have been able to
7 turn to, but they really, unless they were told they
8 could contact the compliance officer or they were able
9 to contact an attorney for themselves, there really
01:54 10 wasn't any mechanism for them to be able to tell someone
11 there was a problem.

12 Q. What happens if a ward just doesn't like
13 their guardian, they want somebody else to be their
14 guardian?

01:54 15 A. There's always the ability to ask the court
16 to change your guardian. The court would have the final
17 say. And if you, if the ward could show a significant
18 reason why they would need a different guardian and
19 maybe could find somebody else to be their guardian,
01:55 20 guardianships have changed hands and successive guardian
21 has been appointed when there's been some contention or
22 something like that, but it's ultimately up to the court
23 to replace a prior guardian and put a new guardian in.

24 Q. What happens if at some point in the
01:55 25 guardianship a ward says I don't want to be in a

01:55 1 guardianship anymore, I want to handle my own medical or
2 financial decisions?

3 A. It's up to the guardian to request an
4 additional competency evaluation. So if someone comes,
01:55 5 if you're visiting with their ward and they're saying
6 again that they believe that they're able to handle
7 their own affairs, if there has been a change in their
8 condition and they've improved, part of the standards
9 and ethically as the guardian you should be requesting
01:55 10 an updated competency eval to see if there's even any
11 reason for the guardianship to continue.

12 Q. Can a guardian restrict who visits and, you
13 know, meets with and even telephones a ward?

14 A. They can. They do have the ability to do
01:56 15 that. It should be used only in times when a certain
16 visitor could be a danger to the ward or it upsets them
17 or they've said I definitely don't want to visit with
18 this person, we can restrict that visit, that visitor.

19 Q. How would the guardian restrict access if
01:56 20 the ward lives in like a group home or a facility?

21 A. Generally we would let the group owner know
22 that there's a problem with a specific visitor so if
23 they came to the door they would say sorry, you can't
24 visit, please call the guardian's office to discuss any
01:56 25 concerns, and then if they refuse to leave they could

01:56 1 call the police in order to have them removed from the
2 premises.

3 Q. What happens to a guardianship when the
4 ward dies?

01:57 5 A. The guardianship is effectively terminated,
6 however you do have what's called a wrapping up period
7 that you can take care of those kind of affairs that are
8 going to take a little bit of time. You actually have
9 90 days after the death of a ward to wrap up the
01:57 10 guardianship and file the final accounting with the
11 court to show them how you managed those funds.

12 Q. Now if a ward has most of their money in a
13 trust or a house in a trust, does the guardian just by
14 virtually being the guardian over the ward have access
01:57 15 to the trust or maybe assets to the trust?

16 A. No, they'd have to be appointed as the
17 successor of that trust and they would have to either
18 have the court take jurisdiction of that trust and
19 appoint them as the successor trustee or they'd have to
01:57 20 go to probate court to get that done. At the Public
21 Guardian's Office we feel that's a conflict of interest
22 and we don't serve as a successor trustee for a trust
23 and as guardian, they're two very separate entities and
24 often can have competing views on how money should be
01:58 25 spent and what they're trying to do. So we always have

01:58 1 an independent third party appointed as successor
2 trustee if the ward, the person the ward had designated
3 to become the successor trustee either we can't find
4 them or they're unable or unwilling to serve.

01:58 5 Q. What's the difference between having a
6 guardianship and having a power of attorney?

7 A. Well, a power of attorney needs to have
8 been executed when the person was competent. So say ten
9 years ago somebody writes down and completes power of
01:58 10 attorney documents naming who they want to be their
11 power of attorney if they're ever in a situation where
12 they lose cognitive ability they can name them. If we
13 find power of attorney documents that names somebody
14 that were created when that person was competent, we'll
01:58 15 try and contact that person before we even start a
16 guardianship. If you have those documents and they're
17 appropriate documents, there really is no need for a
18 guardianship at that point. A guardianship is
19 instituted when the person is incompetent and hasn't put
01:59 20 anything together in an estate planning.

21 Q. Let's say I have my friend, you know, five
22 years ago gave me power of attorney just in case
23 something should happen to him that incapacitates him.
24 And five years down the road that event happens and
01:59 25 maybe it's, you know, a manifestation of schizophrenia

01:59 1 or something like that. I have power of attorney
2 paperwork for him. I could maybe go into a bank and
3 deal with his money, make sure his bills are getting
4 paid. But is it appropriate to still have the power of
01:59 5 attorney going on if he then, based upon acting on
6 voices or hallucinations that he's experiencing, goes in
7 and does crazy things with his money where if that
8 continues his financial condition is going to be poor?

9 A. And that's really going to be, you said a
02:00 10 case by case basis, if that person really feels that
11 they need some additional protections that the
12 guardianship could afford them, I have seen some power
13 of attorneys do that in certain situations if the bank
14 isn't complying maybe with the power of attorney and
02:00 15 they need to protect that money, sometimes that would
16 work, or in the example you've given, yes, I mean in
17 order to protect those funds from someone, that power of
18 attorney may go to the court and say my power of
19 attorney is just not sufficient at this time to really
02:00 20 protect those assets. And if they were named as power
21 of attorney, the guardianship court is going to give
22 them priority over somebody else if they've applied to
23 become the guardian.

24 Q. So the person that gives out the power of
02:00 25 attorney, they can rescind that power of attorney at any

02:00 1 time?

2 A. They can.

3 Q. Just because I have power of attorney over
4 my friend doesn't restrict his ability in any way to

02:00 5 conduct business?

6 A. Right. It can sometimes be concurrent, and
7 it often depends how the power of attorney is written.

8 There's different types of power of attorney that may
9 say limited things that you're able to do. It could be

02:01 10 a very broad power of attorney that says if two doctors
11 say I'm unable to manage my affairs, you take over
12 everything. It really depends on how that's written.

13 Q. Okay. So the guardianship gives way more
14 power than the power of attorney?

02:01 15 A. Often, yeah. It's often seen by hospitals
16 and the banks sometimes as having a little bit more
17 power in the sense that the court's overseeing it, the
18 court has ordered this, rather than someone just coming
19 in with some documents and saying please give me access
02:01 20 to this account now.

21 Q. Regarding end of life planning, if I have a
22 guardianship, can I withdraw them from life support if
23 they're on life support or initiate some kind of do not
24 resuscitate should the situation arise?

02:01 25 A. First thing we would do if the doctor was

02:01 1 recommending that is really look for the estate planning
2 documents to see what the person has put in writing when
3 they were competent. So if there are documents that say
4 I don't want any heroic measures, I don't want to be on
02:02 5 any kind of mechanical ventilation, I don't want feeding
6 tubes, then we're going to honor those 100 percent. If
7 we have no documents to go by but there's family
8 members, we're going to contact all the family members
9 to kind of talk about what would this person have
02:02 10 wanted, you know them better maybe than we do, what
11 would this person have wanted to happen. And if we can
12 all come to an agreement with the family then we can
13 move forward with the doctors. If we have no family,
14 we've got no indication of what this person would want,
02:02 15 we'll often go to the court to get the ability to
16 withdraw any kind of life support so that their rights
17 are being protected at all times.

18 Q. As the guardian can I decide to move a ward
19 pretty much anywhere I want? So the ward currently
02:02 20 lives in North Las Vegas, can I move them to a group
21 home in Boulder City?

22 A. You can. Cause there could be a number of
23 reasons for doing that, whether it's you need to find
24 somewhere that's within their budget, they need to move
02:03 25 to somewhere due to behaviors or something that's going

02:03 1 on with their current cognitive decline and there's a
2 facility that maybe helps with that particular diagnosis
3 better. If there's family as a guardian we try and keep
4 it close to family so visits can continue, if there's
02:03 5 friends, but ultimately yes, we do have the ability to
6 be able to move somebody.

7 Q. Can I move the ward out of state? Can I
8 move somebody to San Diego?

9 A. You'd need court permission to do that.
02:03 10 You'd have to inform the court so that they can look and
11 see if a guardianship needs to be transferred or if
12 you're going to remain as guardian. We have a couple of
13 clients out of state due to meeting very specific
14 traumatic brain injury clinics that we've been able to
02:03 15 move them out of state, but we've remained as the
16 guardian here in Nevada.

17 Q. What kind of responsibilities does the
18 guardian have to safeguard a ward's property?

19 A. They have ultimate responsibility and
02:04 20 they're accountable to the court to make decisions that
21 are in the best interest of that estate and make sure
22 they maximize the benefits that are available to the
23 ward.

24 Q. Is there any standards that go into putting
02:04 25 together the inventory? So you said within 60 days of

02:04 1 becoming a guardian you have to do an inventory which is
2 an accounting of all the property in one's house, the
3 house if it is property, vehicles, bank accounts,
4 income, things like this. Is there any standards for
02:04 5 that, how that's done?

6 A. The statutes do say if you can get
7 certified appraisers that's definitely preferable, but
8 if you're unable to do it within a short period of time,
9 say you didn't have any money to pay for an appraiser,
02:04 10 you can just list the items and state that it's pending
11 appraisal. If there is a certified appraiser used, any
12 item that's worth over \$100 needs to be listed
13 independently within that inventory. So if they've gone
14 into the house and there's a lot of jewelry and
02:05 15 paintings, anything over 100 needs to be specifically
16 itemized within that inventory.

17 Q. What about selling the ward's property,
18 does the guardian just have the ability to do that?

19 A. The court does require that you have
02:05 20 permission to do it unless it's something that's going
21 to spoil or anything like that, you can kind of get rid
22 of those things or if it's going to significantly
23 decrease in value before you get the opportunity to go
24 into court and get permission to do it. But as I said a
02:05 25 lot of guardians will put some kind of standard language

02:05 1 in their orders that allows them to sell personal
2 property, but the court still requires that you do the
3 noticing. You have to notice people and the family that
4 you're going to be selling items. At the Public
02:05 5 Guardian's Office we send out letters and notify them to
6 let us know if there's any items of sentimental value,
7 if there's any items, you know, heirlooms that are very
8 important to the family, let us know about those so we
9 can put those to the side along with the photos and
02:06 10 anything like that that we find in the house so that
11 they're preserved for any family members.

12 Q. So after permission is obtained to sell
13 property that isn't perishable, how does the selling
14 actually take place?

02:06 15 A. Generally through an auction. People will
16 contract with an auction company, take all the items
17 there, often including a car. I know some private
18 guardians have looked at estate sales, but there's risk
19 and benefits with that. Currently our office uses an
02:06 20 auction house and all the items are sent there. We have
21 used in the past companies like eBay to sell, you know,
22 if we want to sell certain pieces of jewelry we think
23 are worth a lot of money or that may have some value
24 outside of Nevada, there's some kind of link to other
02:06 25 parts of the country. Anything of significant value

02:07 1 you'd want to put a reserve on to make sure that you're
2 getting the best dollar amount for that estate.

3 Q. Is there any condition precedent, is there
4 any like catalyst as to why you would sell a ward's
02:07 5 property?

6 A. There could. Say for example the ward
7 needs to move to a higher level of care where they're
8 going to get 24 hour nursing care and you've talked with
9 the physician and there's really no chance of this
02:07 10 person being able to return to their home, there's
11 equity in the home that you may need to access to pay
12 for the cost of the care, so in order to sell the house
13 you have to clear out the home, sell that property and
14 that money can also be used for their cost of care.

02:07 15 Q. So is the house and the personal effects
16 ever maintained if the ward is in a facility and not
17 able to live there?

18 A. It's definitely a case by case basis. For
19 the most part the money is usually needed in order to
02:08 20 pay for cost of care I would say in probably 95 percent
21 of the cases. We do have some cases where someone is in
22 hospital but may be able to return home and does have
23 the funds in order to have 24 hour care in the home and
24 if we can do that we will do that. If we can show over
02:08 25 the long term planning for this case that there's a good

02:08 1 chance they'll be able to stay in there for a
2 significant amount of time in their own home, we'll do
3 it. But most of the time you're going to need to access
4 any equity in there. You don't want to be paying
02:08 5 mortgages and all the costs of the upkeep of a home when
6 there's, they need that money for their care, their
7 ongoing care.

8 Q. What about a home where the value is
9 underwater, so the debt obligation is more than the
02:08 10 value of the house or, you know, what is due and owing.
11 Do you keep the house or what do you do with the house
12 then?

13 A. In that situation we would go to court with
14 all the documentation showing the negative equity and we
02:09 15 would request permission to abandon that property and
16 then we would let the mortgage company know that the
17 estate has abandoned this property, they can no longer
18 afford to keep it up and no further monies will be spent
19 on it or sent to them. And then eventually it will go
02:09 20 into foreclosure.

21 Q. What can a guardian charge for their
22 services?

23 A. There is no specific dollar rate that a
24 guardian can charge. What the statutes and the
02:09 25 standards of practice say is, the word is

02:09 1 reasonableness. Is it reasonable what you're charging
2 this person for your services. Have you looked at
3 other, the services you're providing, have you looked at
4 other cheaper alternatives to providing that same
02:09 5 service or are you billing at a higher rate. Are you
6 providing services that can be provided by somebody
7 else. So are you billing a lot of money or a lot of
8 minutes for something that really shouldn't take that
9 long. The court is going to be hopefully looking at
02:10 10 those items and determining whether the billing is
11 reasonable or not.

12 Q. Okay. As far as hourly rates, are you
13 aware of what private professional guardians have been
14 known to charge here in Clark County?

02:10 15 A. Oh, possibly between 150 and \$175 an hour
16 is from my memory, but I'm not 100 percent sure about
17 that.

18 Q. Are they supposed to bill any kind of
19 minute increments or it's just I did some work for you,
02:10 20 it took less than an hour, I'm billing you for an hour?

21 A. The guardianship standards state that you
22 should be billing for the time you're actually spending
23 on a certain action. So there really should be block
24 billing. If something took you two minutes but you're
02:11 25 going to charge them for ten minutes, the reasonableness

02:11 1 part of this is that you're actually charging for the
2 work that was performed and the time actually expended.
3 Kind of looking at how much attention and skill level is
4 needed to do that particular action.

02:11 5 Q. As a part of that calculus, let's say,
6 because you mentioned that the guardian is supposed to
7 have face-to face-visitation with a ward once a month.

8 A. Uh-huh.

9 Q. That obviously probably involves driving to
02:11 10 wherever the ward is.

11 A. Correct.

12 Q. So let's say round trip, it's about an hour
13 of driving, does the guardian bill for that?

14 A. Yes, we do bill for the drive time and we
02:11 15 bill for the time we're at the facility talking to
16 everybody, reviewing charts, things like that. However,
17 if there are multiple people within the group home,
18 which often happens for our office, we'll have multiple
19 people and the case manager may be seeing three people
02:12 20 in one home, they're going to split that drive time
21 between the three people that they're seeing, we're not
22 going to bill each of them for the full drive time.

23 Q. Okay. So if there's a ward that lives in a
24 group home and no other ward supervised by that guardian
02:12 25 or in the same group home and it takes a half hour to

02:12 1 drive there, they're going to visit for let's say an
2 hour once a month and then a half hour to come back and
3 that guardian charges \$150 an hour, that's a 300-dollar
4 per month visit?

02:12 5 A. It could be. I would say most of our
6 visits maybe don't last that long. If you're going out
7 on a regular basis you're not going to be spending a lot
8 of time reviewing the whole charts. It's important to
9 know we're not there as a companion for the ward, we're
02:12 10 there to ensure their care is being taken care of. So
11 we're not going to sit there and just talk about
12 something that maybe happened in their past as a
13 companion, we're there to sit with them, make sure their
14 care is being taken care of, are they clean, is there
02:13 15 any wounds that are going on, is there problems in the
16 home with cleanliness. We're really looking to advocate
17 what's happening in the home, not providing
18 companionship. We can hire companies that will go out
19 and provide that companionship at a much lower rate than
02:13 20 we would provide.

21 Q. In your experience what is the rate for
22 someone providing companionship?

23 A. Through a number of different companies we
24 work with it could range from \$17 an hour to about \$22
02:13 25 an hour. Some of the companies will have two hour

02:13 1 minimums, some will have three hour minimums, but
2 generally within 17 to \$22 an hour.

3 Q. So a companionship assistant, their hourly
4 rate is vastly cheaper than a guardianship rate?

02:13 5 A. Absolutely.

6 Q. Is there standards that say the guardian is
7 not there to hold somebody's hand and listen to their
8 stories and bill them at normal guardianship rates?

9 A. Yes. You know within the standards that
02:14 10 you look at, you need to see if the service that you're
11 providing, can it be provided to somebody at a lower
12 rate. So the PCA or the personal care attendant
13 companionship services that this person needs to go on
14 an outing, maybe they like to go to dinner once a week
02:14 15 and they have the funds to be able to do that, as the
16 guardian, if you're looking at how the estate is going
17 to function, I'm going to hire a company to go and do
18 that rather than doing it myself, even at the case
19 management rate of \$95 an hour. It's a lot different.

02:14 20 Q. Okay. Does that pair with the fiduciary
21 duty responsibility to minimize expenses for the ward
22 and safeguard their estate?

23 A. Yes.

24 Q. What happens when the ward doesn't have
02:14 25 money to pay the guardian's bills or any other bills

02:14 1 they may encumber?

2 A. Often once we get to a point where there's
3 no funds we'll apply for governmental benefits, either
4 through Medicaid or Clark County Social Services. They
02:15 5 have different programs that allow someone to stay
6 within a group home, they'll kind of supplement the pay
7 to that group home to allow them to stay there. So
8 we'll apply for those benefits and of course for our
9 office we'll continue with the guardianship services
02:15 10 even if there are no funds available to pay for them.

11 MR. RAMAN: Ladies and gentlemen, we're at
12 2:15. If you'd like to take an afternoon break at this
13 time, 15 minutes might be appropriate. We're going to
14 take a break.

02:15 15 (Recess.)

16 BY MR. RAMAN:

17 Q. Regarding that hourly fee, you came up with
18 a couple different hourly fees. You mentioned that the
19 Public Guardian's Office case managers charge \$95 for
02:30 20 guardianship services.

21 A. Yes.

22 Q. You mentioned that the Public Guardian
23 herself might charge, was it \$230 an hour?

24 A. Two thirty-five currently.

02:30 25 Q. Two thirty-five. And you mentioned that

02:30 1 you've heard of private professional guardians, or are
2 aware of private professional guardians charging between
3 \$150 an hour and \$175 an hour. Is there any rhyme or
4 reason as to why these numbers are what they are? You
02:30 5 say that a guardian by definition is somebody who steps
6 in for somebody when they're incapacitated in one way or
7 the other and handles their either finances or medical
8 decisions, guardian of the person or guardian of the
9 estate. Why does that cost \$150 an hour to do what the
02:31 10 person could have done for free if they were of sound
11 body and mind?

12 A. I can tell you from the Public Guardian's
13 perspective, like I said our costs are just calculated
14 based on the overhead for our office. I'm not
02:31 15 100 percent sure how a private professional guardian
16 would set their rates. They could look at the extensive
17 record keeping that should be taking place. I mean,
18 cause the billing realistically for a couple of bills
19 that you may get for someone shouldn't be taking that
02:31 20 much of your time. It's managing their day-to-day
21 affairs, applying for any benefits that they're entitled
22 to, knowing what benefits are out there for them. But
23 really the proper management of investments, selling
24 property, there's somewhat of a wide variety of
02:32 25 information that you'll need to have as a guardian as

02:32 1 you can have people from all walks of life and who have
2 all kinds of different backgrounds and all types of
3 different assets and medical conditions that need to be
4 managed.

02:32 5 Q. Part of that fiduciary duty that you
6 explain, so the duty to maintain and preserve the
7 finances of an individual under guardianship, for tasks
8 such as receiving reoccurring checks, so for example a
9 person is placed under guardianship and they monthly
02:32 10 receive a check from the Social Security Administration
11 for \$1500, normally somebody would take a check and they
12 would take it down to a bank and deposit it. Obviously
13 you also explained that the guardian virtually in all
14 cases would shut down the ward's personal accounts and
02:33 15 create new accounts in the name of the guardianship;
16 correct?

17 A. Correct.

18 Q. So is there any kind of duty or
19 responsibility to minimize cost on the ward by not
02:33 20 taking said check, going down to the bank, filling out
21 deposit slip, depositing it, and then coming back and
22 billing the ward for all the travel time and actual bank
23 time, such as direct deposit?

24 A. Yes. You need to put as many things as you
02:33 25 can on a direct deposit, reoccurring, any pensions, any

02:33 1 of their income would be in the best interest of that
2 estate. Often the most cost comes right at the
3 beginning of a guardianship when you're setting
4 everything up, having to contact all the different
02:33 5 areas, get all the paperwork in. Once a guardianship is
6 kind of just ticking along there's not going to be as
7 much billing to it, not nearly as much as there is in
8 the first few months.

9 Q. Similar circumstance, let's say that the
02:34 10 person under guardianship is still in their own home and
11 they have medical assistance to attend to their needs
12 and they have a dog, should a guardian go out and charge
13 full guardian rate, \$150 an hour, to purchase dog food
14 and deliver it to the house?

02:34 15 A. No. They have 24-hour caregivers in the
16 home. The caregivers can be provided with funds to be
17 able to go and purchase those items. They're already
18 being paid to be there. If it's a situation where
19 medically maybe the person can't leave their home, there
02:34 20 are companies that will actually do that kind of
21 shopping for you. You just have to give them the
22 information and they can go. But generally with the PCA
23 companies, even if the caregiver in the house can't do
24 it, they have staff at the main office who will take
02:34 25 care of those types of tasks.

02:34 1 Q. What happens when a guardian decides they
2 need an attorney to help represent them in the family
3 court?

4 A. The statute does allow for a guardian to
02:35 5 have an attorney and their fees are paid from the estate
6 of the ward.

7 Q. So if my guardian decides for whatever
8 reason I would like an attorney to represent me, an
9 attorney cost a lot more than a guardian rate; correct?

02:35 10 A. That is correct.

11 Q. Maybe several hundred dollars per hour
12 more?

13 A. Oh definitely. I've seen anywhere from 300
14 to \$450 an hour.

02:35 15 Q. Okay. So if my guardian decides for
16 whatever reason at the annual accounting or the
17 inception of the guardianship that they want an attorney
18 there, that cost is being passed onto the ward?

19 A. Yes.

02:35 20 Q. And that's 100 percent okay in the statute?

21 A. It is.

22 Q. Is there any duty to discover whether a
23 ward has a will of any kind?

24 A. Yes. There is a requirement, if you are
02:36 25 aware of any type of will that lists, has a nomination

02:36 1 of guardian or lists any information for estate
2 planning, you need to inform the court as that person
3 listed in that will as a nominated guardian would have
4 preference over nearly everybody else in becoming the
02:36 5 ward's guardian.

6 Q. Is it okay for a guardian to bill for
7 services not rendered? So for example, like you said
8 there are often circumstances where multiple wards
9 supervised by a guardian live in the same group home.
02:36 10 It takes a half hour to visit and a half hour travel
11 time, total one hour, and then maybe ten minutes are
12 spent with each ward because you said it's really just
13 checking on their charting, making sure their situation
14 is being taken care of from a medical and financial
02:37 15 standpoint; correct?

16 A. Yes.

17 Q. Let's say that entire visit is done in an
18 hour, so you have an hour of travel and an hour of
19 visitation across the five wards, should all five wards
02:37 20 be billed two hours?

21 A. They should not be. The time should be
22 split between, the travel time between all of the wards
23 and individually how much time was spent on each ward's
24 case at that home should be billed to that ward, so not
02:37 25 billing two hours to every single person.

02:37 1 Q. So if each and every ward was billed two
2 hours in that case, they would have been billed five
3 times as much as they should have been?

4 A. Correct.

02:37 5 Q. Does the guardian have to take care of the
6 ward's taxes?

7 A. Yes, if you're the guardian of the estate
8 you're responsible for filing those taxes.

9 Q. And how commonly does a guardian become
02:37 10 guardian? How does let's say a private professional
11 guardian, how do they become aware that somebody might
12 need guardianship and they become the guardian; how does
13 that process work?

14 A. My understanding is they receive referrals,
02:38 15 like our office receives referrals from the community.
16 I'm aware of some private professional guardians having
17 some kind of contract or understanding with certain
18 companies, be it a hospital or a facility in the
19 community, that they will refer to them to try to get
02:38 20 them out of the hospital faster if they're in need of a
21 guardian, possibly faster than the Public Guardian's
22 Office can move and become the guardian for that person.
23 So the hospital will pay that private professional
24 guardian to move that process along.

02:38 25 Q. So is there a reason from the hospital's

02:38 1 standpoint in your experience that they would want
2 somebody to have a guardian?

3 A. Yes. If the person is not able to make
4 their own medical decisions and they've been deemed that
02:38 5 way by a physician at the hospital, all the hospital is
6 aware when they come in that they're unable to make
7 their decisions, they're not able to give consent to an
8 effective discharge plan, so often somebody could be
9 sitting in the hospital and not able to leave because
02:39 10 they can't consent to an appropriate discharge.

11 Q. So does that scenario exist if the person
12 in the hospital has willing and able family members but
13 there's no guardianship in place?

14 A. Generally if there's willing and able
02:39 15 family members, they're able to work with the facilities
16 and the family members in order to make those informed
17 decisions to get someone into a facility. Often the
18 hospital will advise them that they can apply for
19 guardianship and it may help in the future, but I know
02:39 20 they will work with them if there's family members
21 there.

22 Q. Okay. So if a hospital is unable to find a
23 willing and able family member to handle that
24 responsibility, they may call somebody who is a private
02:39 25 professional guardian and say hey, I have this patient

02:39 1 here, I believe they need guardianship, they have
2 doctors on staff who will sign that physician's
3 certificate and all of a sudden a petition is filed in
4 family court that this person needs somebody to take
02:40 5 over either their person or their estate or both?

6 A. That's correct.

7 Q. Okay. So that's initiated by the hospital
8 who is taking care of the patient?

9 A. Yes, often. I've also seen it from some
02:40 10 group homes, if they're having problems with benefits
11 that they're not able to access, I've seen it from
12 certain hospice agencies, and like I said some of the
13 skilled nursing facilities in the valley also have those
14 types of contracts.

02:41 15 Q. Is there any time difference, either
16 historically or currently, between how quickly the
17 Public Guardian's Office can step in and apply for
18 guardianship versus a private professional guardian?

19 A. Yes. The Public Guardian's Office often
02:41 20 does take longer than a private professional guardian.
21 If we're at a caseload limit and we don't have the
22 ability to just go and hire a new case manager to fill
23 the backlog of the referrals, a private professional
24 will have a lot more ability to do that, so yes it has
02:41 25 been historically and currently seen that a private

02:41 1 professional can often move a little bit faster on a
2 case than our office might be able to.

3 Q. Is there currently a wait list for getting,
4 if someone gives a referral to the Public Guardian's,
02:41 5 office currently, is there some kind of wait time?

6 A. Yes. As of our figures last month we had
7 about 340 people still pending a guardianship in Clark
8 County through the Public Guardian's Office.

9 Q. What does that amount to waiting time wise?

02:42 10 A. It depends. We try and prioritize the
11 cases based on the need of the proposed ward. So say we
12 get a referral and the person is in the community
13 currently at risk medically or being exploited, we're
14 going to place that case higher than another, a case of
02:42 15 someone who maybe is in a group home who is in a safe
16 environment who may just need some medical decisions in
17 the future. So it depends on the case. Some cases can
18 wait months, some we can get out in a few weeks. It
19 just really depends on how we prioritize that case when
02:42 20 it comes in and the danger to the proposed ward at that
21 time.

22 Q. Are you aware of any similar backlogs with
23 private professional guardian companies or are they able
24 to jump in and do things?

02:42 25 A. Not that I'm aware of. The real difference

02:43 1 is if they get a referral that they don't want to take,
2 they just refuse to accept that case. We don't have
3 that ability at the Public Guardian's Office. We must
4 accept the referrals and work them as we can as a
02:43 5 government agency.

6 Q. Is there any tendency, you're saying that
7 the private professional guardians have the ability to
8 refuse because they are for profit companies?

9 A. Correct.

02:43 10 Q. Is it common that the private professional
11 guardians will take cases where a ward or a proposed
12 ward has no assets, no money coming in?

13 A. From my understanding if they do take those
14 types of cases their cost may be paid by a third party
02:43 15 such as a hospital or a facility in order to be able to
16 get the person on Medicaid for example. That's
17 something that our office, it's not a priority for us if
18 the hospital is just wanting Medicaid so they can get
19 paid, that's not a priority. So some cases that need
02:43 20 Medicaid may be referred to a private agency in order to
21 get the Medicaid and then all their costs are paid by
22 the hospital.

23 Q. Do you ever take cases and step in to be
24 the guardian when the referral comes from Elder
02:44 25 Protective Services?

02:44 1 A. Yes.

2 Q. And regarding the accounting, you mentioned
3 in cases where a ward's estate exceeds \$10,000 it would
4 require an annual accounting. Is there a time frame for
02:44 5 when that would be due?

6 A. It all depends on the anniversary date. So
7 for example, if you're appointed as the general guardian
8 as of January 1st say of this year, of 2016, your
9 accounting is due six months after that anniversary, I'm
02:44 10 sorry, two months after your anniversary day of the next
11 year. So my accounting would be due between
12 January 1st, 2017 and March 1st, 2017, so 60 days after
13 your anniversary date every year.

14 Q. When hearing master Norheim was in charge
02:44 15 of the guardianship court, were those kind of deadlines
16 and reporting requirements being enforced?

17 A. Not to my knowledge, no. I know internally
18 for the Public Guardian's Office we have our own checks
19 and balances in place in order to make sure statutorily
02:45 20 we met requirements, but it's our understanding that the
21 compliance officer was not able to track that
22 information at that time.

23 Q. Was there a high percentage of out of
24 compliance cases?

02:45 25 A. Yes. From information that I received from

02:45 1 the court it was a huge percentage, I mean over
2 75 percent is my understanding of these cases at least
3 were out of compliance.

4 Q. Were there many people on the rolls as far
02:45 5 as the court docket of being in guardianship that were
6 long passed away?

7 A. Yes. From my recollection when Judge
8 Dianne Steel took over there was probably about 8,000
9 cases on the docket and currently I think last count was
02:46 10 somewhere around 2900. They've been able to close out a
11 whole stack of cases that really didn't need to be on
12 the docket any further.

13 Q. So the rough math of that is maybe there
14 were about 5,000 phantom guardianships on the books?

02:46 15 A. Yes, either the person had passed away and
16 no accounting had been done, the person moved out of
17 state, they can no longer contact the guardian or the
18 proposed ward, and our office has actually received
19 cases from the court saying can you please look into
02:46 20 where this person is and we're kind of helping the court
21 work through that as well.

22 Q. Is there any relation to your job with a
23 ward and eventually when somebody dies their estate
24 might go in probate?

02:46 25 A. Yes, that does happen.

02:46 1 Q. Do you have any involvement in that
2 process?

3 A. The only involvement we have is if there's
4 absolutely no family and the estate meets certain
02:46 5 criteria we'll refer it to the Public Administrator's
6 Office. If there is family we'll let them know they
7 need to provide us with letters of administration or
8 some kind of order from the probate court telling us
9 what to do with any leftover estate funds.

02:47 10 Q. Okay. And is the Public Administrator also
11 a county employee?

12 A. Yes. I believe it's an elected position
13 but he does work for the county.

14 MR. RAMAN: Okay. Those are the questions
02:47 15 that I have. If any grand jurors have questions, please
16 feel free to ask.

17 BY THE FOREPERSON:

18 Q. If I were to become a public guardian for
19 Clark County, I assume that you're going to conduct some
02:47 20 sort of public background investigation on myself?

21 A. If you're going to apply to be a public
22 guardian, it's actually through the county so you'd have
23 to be hired as a county employee and we do FBI
24 background checks for Clark County. If you're wanting
02:47 25 to become a private professional guardian, the only

02:47 1 requirement is through the Center for Guardianship
2 Certification, whatever background check they do as part
3 of the certification.

4 Q. But it's not necessarily a FBI background
02:48 5 investigation?

6 A. Not to my knowledge.

7 Q. Thank you.

8 BY A JUROR:

9 Q. Am I to understand the executor, if there
02:48 10 is an executor, would handle the administration of the
11 estate at that, not the guardian?

12 A. Correct. If there is a will and it lists
13 an executor, as the guardian, once the estate has been
14 all wrapped up, we would contact them and they would
02:48 15 either give us letters of administration or some type of
16 order and we'd turn over the information to them to do
17 the probate.

18 Q. And are you aware if guardian bank accounts
19 are set up, do they have any type of creditor protection
02:48 20 by statute?

21 A. That I'm not aware of.

22 Q. Okay.

23 BY A JUROR:

24 Q. Is it legal and/or ethical for a person who
02:48 25 is a guardian to also serve as a companion providing

02:48 1 they charge the companion rate?

2 A. That I'm not aware of. I would think
3 ethically as long as the rate is in line with what
4 others would charge, I think the court would be okay
02:49 5 with that, but there is nothing specifically in the
6 statutes. What our standards of practice say is we need
7 to avoid conflict of interest at all costs. We need to
8 be showing that we're doing what's in the best interest
9 and if keeping everything separate is the way to do
02:49 10 that. There is an ability to do that if you are going
11 to charge that rate to let the court know ahead of time
12 and get court blessing on that to do that type of work.

13 BY A JUROR:

14 Q. What department of the government is
02:49 15 responsible for investigating abuse of people that are
16 in guardianship?

17 A. Some of the, if they're over 60, sometimes
18 the complaints will go to Elder Protective Services. In
19 the last year and a half the courts have set up a
02:49 20 compliance, guardianship compliance line where people
21 can make complaints to for guardianship, but that is
22 only in the last year and a half. Before that the
23 police would receive complaints and look into them as
24 they could.

25

02:50 1 BY A JUROR:

2 Q. You just said the elderly -- what was it?

3 A. Elder Protective Services.

4 Q. They won't help you if you do not have

02:50 5 guardianship.

6 A. Okay.

7 Q. I found that out the hard way. All these
8 rules that you have been stating, is that just for your
9 department? Because I know guardians out there who have

02:50 10 spent thousands of dollars off of people and they can
11 get away with it because they are the guardian.

12 A. The statutes that I discussed are Nevada
13 statutes that all guardians should be adhering to and
14 the court should be looking at that.

02:50 15 Q. So they can, someone like me, call a
16 compliance officer and ask them to check on someone?

17 A. Yeah, there is a guardianship compliance
18 telephone number now through the Family Court. There's
19 a person who is there all the time. We actually get
02:51 20 calls from their office to try and assist some people
21 and in some cases they'll reach out to the police if
22 they need to or if needed they can try and get, tell the
23 person to get something, a petition on in front of the
24 judge so that they can, the judge can look at it.

25

02:51 1 BY A JUROR:

2 Q. You need a doctor's note to declare a
3 person incompetent?

4 A. Yes.

02:51 5 Q. You don't need a judge's decision to
6 declare that person incompetent?

7 A. It's technically the judge's decision. The
8 back-up documentation or the certificate of incapacity
9 is what's giving the information to the judge of the
02:51 10 cognitive deficit that this person might have. So even
11 though it's a certificate of incapacity it's actually
12 that judge's ruling that makes them incompetent, yes.

13 BY A JUROR:

14 Q. And one last thing. Did you, did I hear
02:51 15 you correctly that if that power of attorney is in
16 place, your office would be loath to establish
17 guardianship?

18 A. If we are aware of a power of attorney
19 that's not being investigated for exploitation or
02:52 20 anything like that, if we come across the power of
21 attorney, the court even requires that they have
22 priority over someone else. This is a written document
23 that someone has put into place as estate planning and
24 we'd be looking to them to step in first. With the
02:52 25 backlog we have we're always looking for people that

02:52 1 want to assume that responsibility so for our office
2 100 percent, yes.

3 MR. RAMAN: I have a few follow-ups.

4 THE WITNESS: Okay.

02:52 5 BY MR. RAMAN:

6 Q. Regarding private professional guardians,
7 were there changes in the law passed that require
8 certification and licensing in 2015?

9 A. Yes.

02:52 10 Q. And have those come into effect yet?

11 A. Not yet. I know the last deadline was back
12 in July but I know of two local private professional
13 guardians that were going through the licensing process
14 that have not yet been licensed cause they're still, the
02:53 15 department is still figuring out how to do that.

16 Q. So is it fair to say that even in present
17 day there is no, I guess soon to be but up until that
18 happens there has been no licensing requirement of
19 private professional guardians, people who supervise
02:53 20 three or more wards?

21 A. That's correct.

22 Q. Is it ethical to have the guardian or the
23 guardianship company do mental testing on the ward?

24 A. No.

02:53 25 Q. Like them or their employees?

02:53 1 A. No. I can tell you from the Public
2 Guardian's perspective, we'll go out and we'll try and
3 gain history from the client, we call it a guardianship
4 assessment, but we're trying to get information.

02:53 5 Sometimes that will give us an indication that someone
6 has short term or long term memory deficits and we'll
7 inform the court of that, but we're not doing many
8 mental assessments or anything like that. That's done
9 by physicians or some kind of medical professional.

02:54 10 Q. The medical affidavit that accompanies
11 one's application to have somebody placed under
12 guardianship, is there a requirement in the statute that
13 the person being the signatory to that, the medical
14 person be actually an MD or a DO or an actual doctor?

02:54 15 A. No. I can tell you from the Public
16 Guardian's perspective, we always require an MD or a DO
17 to sign that. The court had previously in some
18 situations I know under hearing master Norheim had
19 accepted physician assistants, could have even accepted
02:54 20 a nurse practitioner I believe at some point. We would
21 never submit anything, we always require an MD or a DO,
22 but the statute says it could be a number of different
23 people who submit that information.

24 MR. RAMAN: Okay. Does anybody else have
02:55 25 any follow-up questions?

02:55 1 THE FOREPERSON: By law, these proceedings
2 are secret and you are prohibited from disclosing to
3 anyone anything that has transpired before us, including
4 evidence and statements presented to the Grand Jury, any
02:55 5 event occurring or statement made in the presence of the
6 Grand Jury, and information obtained by the Grand Jury.

7 Failure to comply with this admonition is a
8 gross misdemeanor punishable up to 364 days in the Clark
9 County Detention Center and a \$2,000 fine. In addition,
02:55 10 you may be held in contempt of court punishable by an
11 additional \$500 fine and 25 days in the Clark County
12 Detention Center.

13 Do you understand this admonition?

14 THE WITNESS: Yes.

02:55 15 THE FOREPERSON: Thank you. You're
16 excused.

17 THE WITNESS: Thank you.

18 MR. WESTMEYER: State's next witness is
19 Jaclyn O'Malley.

02:56 20 THE FOREPERSON: Please raise your right
21 hand.

22 You do solemnly swear the testimony you are
23 about to give upon the investigation now pending before
24 this Grand Jury shall be the truth, the whole truth, and
02:56 25 nothing but the truth, so help you God?

02:56 1 THE WITNESS: Yes.

2 THE FOREPERSON: Thank you.

3 You are advised that you are here today to

4 give testimony in the investigation pertaining to the

02:56 5 offenses of racketeering, theft, exploitation of an

6 older person, offering false instrument for filing or

7 record, and perjury, involving an April Parks, Mark

8 Simmons and Gary Taylor.

9 Do you understand this advisement?

02:56 10 THE WITNESS: I do.

11 THE FOREPERSON: Please state your first

12 and last name and spell both for the record.

13 THE WITNESS: Jaclyn O'Malley.

14 J-A-C-L-Y-N, O'M-A-L-L-E-Y.

02:56 15 JACLYN O'MALLEY,

16 having been first duly sworn by the Foreperson of the

17 Grand Jury to testify to the truth, the whole truth,

18 and nothing but the truth, testified as follows:

19

02:56 20 EXAMINATION

21

22 BY MR. WESTMEYER:

23 Q. Good afternoon, Miss O'Malley.

24 A. Hello.

02:57 25 Q. Thank you for joining us today.

02:57 1 Would you tell us how you're currently
2 employed?

3 A. I'm a criminal investigator at the Nevada
4 Attorney General's Office.

02:57 5 Q. How long have you held that position?

6 A. Almost four years.

7 Q. What are your duties as a criminal
8 investigator?

9 A. I am assigned to investigate and research
02:57 10 fraud matters and prepare cases for prosecution.

11 Q. What kind of background and training do you
12 have as a criminal investigator?

13 A. I have obtained trainings through our POST,
14 Police Officer, Peace Officers Standards and Training.

02:57 15 I've attended investigative trainings to do with
16 complicated fraudulent investigations and a lot of
17 on-the-job learning if that counts.

18 Q. Okay. And you said you went through POST.
19 Does that mean you're a sworn peace officer?

02:57 20 A. Yes, I'm a category 1 sworn peace officer.

21 Q. You mentioned you investigate fraud matters
22 is that correct?

23 A. Yes.

24 Q. How does a typical fraud case begin? How
02:58 25 do you get involved in a fraud case?

02:58 1 A. Typically our office receives a complaint
2 from the community or a victim. Typically it's in a
3 written complaint form and our supervisors look at the
4 complaints and then make the decision who should
02:58 5 investigate the complaint.

6 Q. And then at that point that's, that will be
7 assigned to you specifically and then --

8 A. So it could be assigned to me so I would
9 receive the original complaint form, I would review it,
02:58 10 contact the reporting party and conduct my investigation
11 from there.

12 Q. Okay. Now in your role as a criminal
13 investigator in the fraud unit in the Attorney General's
14 Office, were you assigned to investigate a case against
02:58 15 April Parks?

16 A. I was.

17 Q. Would you tell us how that got started and
18 what steps you took?

19 A. Sure. Probably around April 2015 I was
02:59 20 assigned to investigate a series of complaints our
21 office received against April Parks alleging misconduct
22 in her guardianship cases.

23 Q. When you say -- let me ask you this way.
24 About how many of these complaints did you receive?

02:59 25 A. Throughout the months I received several,

02:59 1 but at the initial point in time I received probably
2 around four or five.

3 Q. Okay. And what did you do after you
4 reviewed those complaints that came in?

02:59 5 A. One of the first things I did was to review
6 all of the court filings in the matters from the
7 beginning petitions that were filed to the end to get an
8 idea of what was going on in these situations. Another
9 thing I did was to research the State's guardianship
02:59 10 laws which is Chapter 159 so I could know what the
11 guardian's responsibility was under the law. Another
12 thing I did was to do the background investigation on
13 April Parks, her business and her associates. During my
14 investigation I reached out to the Las Vegas
03:00 15 Metropolitan Police Department to see if they received
16 similar complaints.

17 Q. What type of response did you get from Las
18 Vegas Metro?

19 A. I learned that they did, they had some of
03:00 20 the same ones, and in approximately June 2015 both
21 offices agreed to jointly investigate the matter.

22 Q. Okay. So you were working with officers
23 from Las Vegas Metro as well?

24 A. Yes.

03:00 25 Q. After sort of teaming up with Metro, what

03:00 1 steps did you take in your investigation from that
2 point?

3 A. We obtained through Grand Jury subpoenas
4 bank records for a lot of April Parks' wards. We
03:00 5 conducted interviews with group homeowners, facility
6 administrators of assisted living centers, we did
7 interviews with third party care providers that April
8 Parks used to perform third party care giving services
9 for the wards. We began to look at a great percentage
03:01 10 of April Parks' guardianship cases across the board
11 because in the initial complaints we received it was
12 obvious that despite April Parks' training and
13 experience and the use of attorneys that she was not
14 compliant with the law in filing statutory financial
03:01 15 legal documents with the court.

16 Q. Let me ask you about that just for a
17 minute. You said in light of her experience. Were you
18 able to discover what Miss Parks' experience was?

19 A. I was.

03:01 20 Q. And would you tell us what you found out?

21 A. Sure. Throughout my investigation which
22 consisted of reviewing evidence that we found at her
23 business and historical records that I found, we learned
24 that April Parks is a highly experienced, highly trained
03:02 25 professional guardian who markets herself as such.

03:02 1 Q. When you say highly trained and highly
2 experienced, what do you mean?

3 A. Highly trained in that she has been a
4 professional guardian for approximately 12 years, she's
03:02 5 been appointed guardian in hundreds of cases here in
6 Clark County to include being a probate administrator as
7 well. She is both a certified registered guardian and a
8 nationally certified guardian.

9 Q. Can you tell us a little bit about those.
03:02 10 What does that mean and what is the distinction between
11 the two?

12 A. So the NRS requires professional guardians
13 to be licensed as a nationally certified guardian and in
14 doing that April Parks had to take tests and receive a
03:03 15 passing score where the results of her tests basically
16 are evidence from the certification agency that she's
17 vetted, that she is experienced, that she knows the
18 laws, that she knows how to conduct guardianships, that
19 she knows the ethics and standards of policy and
03:03 20 practice and how to be a guardian.

21 Q. And I think you said there was a second,
22 the national group as well; is that right?

23 A. Yeah. So that is the national
24 certification. The certification, they changed the
03:03 25 names of it, so for all purposes April Parks has always

03:03 1 held that title and that credential of being someone who
2 took tests from the certification agency and was
3 considered somebody who was vetted, as being someone who
4 knew the rules and knew what to do and had the training
03:03 5 to do it.

6 Q. Okay. So that covers kind of her training.
7 You mentioned also she was experienced. Can you give us
8 a little bit of detail on what you were able to discover
9 in terms of Miss Parks' experience as a private
03:04 10 guardian?

11 A. Throughout the investigation some of the
12 evidence that we seized from her business showed that
13 she had represented in some undated resumes that she had
14 worked at nursing homes around the age of 20, that she
03:04 15 was the office manager and Medicaid eligibilities
16 specialist for a nursing home in Boulder City. I
17 obtained state employment records that showed that
18 between 2007 and 2010 she was employed at two different
19 law firms in Las Vegas where she provided guardianship
03:04 20 services for the law firms' clients. I learned that in
21 2011 April Parks went off on her own with her own office
22 and operated her business of A Private Professional
23 Guardian, LLC.

24 Q. When you say she went off on her own in
03:05 25 2011, that implies that there was somewhere else she

03:05 1 was. Do you know where she was working prior to that?

2 A. April Parks prior to that worked at the law
3 firm of Lee Drizin.

4 Q. Do you know what type of work she was doing
03:05 5 there?

6 A. She was working as a guardian for the law
7 firm that provided guardianship services for the legal
8 clients.

9 Q. You're saying in 2011 she formed her own
03:05 10 business; is that correct?

11 A. She opened her own business off-site. She
12 had always been operating the business while employed at
13 the law firms. If that makes sense. I know it's a
14 little complicated.

03:05 15 Q. But beginning in 2011, I think you gave us
16 the name, would you tell us that one more time, the name
17 of the guardianship business that she had?

18 A. A Private Professional Guardian, LLC.

19 Q. I think you also mentioned seizing some
03:06 20 documents from Miss Parks' office. Would you tell us
21 about how that came to be?

22 A. On September 21, 2015, myself and officers
23 of Las Vegas Metropolitan Police Department executed
24 search warrants at April Parks' business in Henderson
03:06 25 and also her home in Boulder City. We also with her

03:06 1 consent searched some storage units where she held
2 property that belonged to wards and some older case
3 files.

4 Q. Okay. Now we'll get into the details of
03:06 5 some of these documents a little bit later. Probably
6 next week as well. But you did have a chance to review
7 all of these documents that you seized not only from
8 Miss Parks but also you said you reviewed the court
9 documents as well; is that right?

03:07 10 A. Yes, I did.

11 Q. In addition to the documents seized from
12 Miss Parks as well as those you were able to obtain from
13 the court, were there any other significant documents
14 that you reviewed as part of your investigation?

03:07 15 A. We reviewed extensive financial records. I
16 reviewed extensive medical records that pertained to
17 medical services that most of her wards received through
18 an insurance benefit where a nurse practitioner once a
19 week visited the wards and once a month a doctor
03:07 20 examined the wards. I also obtained and reviewed
21 documents related to the third party caregiver services
22 that she conducted business with where these caregivers
23 would provide services at a cost of \$20 an hour to
24 perform companionship or take the wards out on events.

03:08 25 Q. All of these documents you reviewed, how

03:08 1 many pages would you say of all this stuff did you have
2 to go through?

3 A. Thousands and thousands if not more.

4 Q. Now after reviewing all these documents,
03:08 5 did you form an opinion about how Miss Parks and her
6 employees were running the business.

7 A. I did. Throughout the investigation I
8 learned that April Parks and A Private Professional
9 Guardian operated as a criminal enterprise where through
03:08 10 the use of filing false documents with the court she was
11 able to conceal a criminal enterprise, racketeering,
12 where she fraudulently billed her wards for services
13 that she rendered. She was able to do this in different
14 manners of billing.

03:08 15 Q. Let me ask you about that. So it sounds
16 like after you reviewed all of these thousands of pages
17 of documents you were able to group discreet instances
18 or groups of instances if you will into different types
19 of malfeasance; is that correct?

03:09 20 A. Yes.

21 Q. I'm going to approach with what's been
22 marked as Exhibit Number 4 and we'll put this up in just
23 a second. But do you recognize Exhibit Number 4?

24 A. I do.

03:09 25 Q. How do you recognize Exhibit Number 4?

03:09 1 A. This is a chart that I prepared related to
2 the different schemes identified in this investigation.

3 Q. Okay. And give us just a second, we're
4 going to put 4 up so everybody can see.

03:10 5 Now you've got a paper copy in front of you
6 there. Are you able to see the kind of big screen over
7 here? It might be a bit of a reach for you. That's
8 okay, you can go off the paper one if it helps.

9 So could you tell us, what are we looking
03:10 10 at here? So first of all, on the top line it says A
11 Private Professional Guardian, LLC. Is that the
12 business we're talking about here?

13 A. Yes, it is.

14 Q. And I'm going to walk up to the screen so
03:10 15 that the members of the Grand Jury know what I'm talking
16 about. Who is this picture of in the middle?

17 A. This is April Parks.

18 Q. And is that why her name is underneath it?

19 A. Yes, it is.

03:10 20 Q. I thought so.

21 Who are these other two folks?

22 A. The gentleman -- did you want to point or
23 do you want me to?

24 Q. Actually before we get to there. This is
03:10 25 Exhibit Number 5. Is this kind of a closeup of

03:10 1 Miss Parks?

2 A. Yes, it's her DMV photo.

3 Q. Okay. And that's a fair and accurate
4 depiction of Miss Parks?

03:11 5 A. It is.

6 Q. Now on the chart there is a gentleman to
7 our left, Miss Parks right. Can you identify that
8 person please?

9 A. Gary Neil Taylor.

03:11 10 Q. Sorry?

11 A. Sorry. That is Mark Simmons.

12 Q. That is the left? Okay.

13 And then I'm showing you Exhibit Number 7.
14 Is that a closeup picture of Mr. Simmons?

03:11 15 A. It is.

16 Q. Again is this a fair and accurate picture
17 of Mr. Simmons?

18 A. Yes, it is.

19 Q. And there is a third person, and I'm going
03:11 20 to adjust the screen so that the members of the Grand
21 Jury can see. And on your paper it should also be on
22 the far right side of the paper at the top. Who is that
23 person?

24 A. That is Gary Neil Taylor.

03:11 25 Q. And showing you Exhibit Number 6. Is this

03:11 1 a closeup of Mr. Taylor?

2 A. It is.

3 Q. And again is this a fair and accurate
4 picture of Mr. Taylor?

03:12 5 A. It is.

6 Q. Who are Mark Simmons and Gary Taylor?

7 A. Mark Simmons is April Parks' assistant and
8 office manager. He held a management position at her
9 company. Mark Simmons was also a certified, a

03:12 10 nationally certified guardian. Mark Simmons I learned
11 through reviewing the evidence and interviews of
12 witnesses was April Parks' right hand man and air
13 traffic controller where most of the contact with the
14 business related to referrals and day-to-day decision
03:12 15 making, banking, billing, that was what Mark Simmons did
16 for April Parks, that was his area.

17 Q. Okay. And I think you said that he was
18 trained and certified as a private guardian as well; is
19 that right?

03:12 20 A. Yes, he is. He has the same credentials
21 and titles that April Parks does as a nationally
22 certified guardian.

23 Q. Is he also medically trained at all?

24 A. Mark Simmons has said that he is a
03:13 25 qualified dementia care specialist.

03:13 1 Q. When you say he said that, what do you
2 mean?

3 A. My research of this title led me to the
4 website of the Alzheimer's Foundation that basically
03:13 5 described this as a training program where you could
6 purchase a series of DVDs and ultimately obtain a
7 certificate. There was another category where it was a
8 certified dementia care specialist that seemed to have
9 some more scrutiny toward dementia care I suppose.

03:14 10 Q. And is that the certification that Mark
11 Simmons has?

12 A. No. He said that he's a qualified dementia
13 care specialist.

14 Q. Okay. Whom did he say that to?

03:14 15 A. He lists that on his resume that I located
16 in the evidence. This is information that April Parks
17 has marketed for her own company. I've reviewed many
18 things that Mark Simmons has written in documents where
19 he signed his name and signature with these credentials
03:14 20 as a dementia care specialist.

21 Q. Okay. Like I said we'll get deeper into
22 those a little later but I just want to kind of get a
23 background.

24 So now this other person here, Mr. Taylor,
03:14 25 and he's pictured right here on the screen, was he also

03:14 1 an employee of April Parks?

2 A. Yes, he was.

3 Q. What sort of work did he do for A Private
4 Professional Guardian, LLC?

03:15 5 A. Gary Taylor performed a series of errands
6 for April Parks where he was paid \$20 an hour up until
7 approximately July 2014 where he was given a salary of
8 \$3200 a month. His main duties --

9 Q. Sorry, I want to stop you there for just a
03:15 10 second. I want to hear about the rest. But how do you
11 know his salary and what his payments were?

12 A. Part of my investigation was obtaining and
13 reviewing financial documents including bank records and
14 payroll records that related to April Parks' business
03:15 15 where I had obtained and reviewed Mr. Taylor's
16 paychecks.

17 Q. Okay. And were you also able to review the
18 timekeeping software from A Private Professional
19 Guardian, LLC?

03:15 20 A. I was.

21 Q. Is that also where you obtained some of
22 this information about salary? Or was that not part --

23 A. Not so much with that timekeeping. April
24 Parks used a payroll service where we reviewed the
03:16 25 records and could calculate that \$20 times -- okay, I

03:16 1 get what you're saying. Yes. I'm sorry. Yes.

2 Q. That's all right.

3 A. The timekeeping software, yes, it would
4 show that on a certain day or in a certain month that
03:16 5 Gary Taylor or any other employee worked a specific
6 amount of hours. Prior to this system there was
7 handwritten time sheets that I also obtained and
8 reviewed.

9 Q. Okay. Now at the top of this document of
03:16 10 Exhibit 4 it says multiple billing fraud schemes and
11 thefts. Now when you put this together, did you put
12 that up there because that's what you believe Miss Parks
13 and her business had done?

14 A. Yes.

03:16 15 Q. Was it as simple as becoming a private
16 guardian and then moving funds from the account of the
17 ward to the business account or is there more to it?

18 A. Well, what the investigation discovered
19 that the billing schemes were related to fraudulently
03:17 20 billing her wards. Do you want me to talk about the
21 ways?

22 Q. Well, I just want to -- so in terms of a
23 general overview, it wasn't as simple as now that I've
24 got control over your finances, you've got \$10,000 in
03:17 25 your account, now I'm just going to move all of that to

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

03:24 1 when she fraudulently obtained the guardianship.

2 Q. How long was Miss Parks and A Private
3 Professional Guardian, LLC the guardian for Mr. Burns?

4 A. April Parks is Mr. Burns' guardian for 26
03:24 5 days.

6 Q. And that \$32,000 that Mr. Burns had, how
7 much of that was left at the conclusion of the
8 guardianship? And again if looking at the report would
9 refresh your memory on that, please feel free to do so.

03:25 10 A. I apologize.

11 Q. That's all right. Take your time.

12 A. Can I tell you what I know she spent it on?
13 I can't seem to find what was left over.

14 Q. Sure. However you can answer the question,
03:25 15 sure.

16 A. So April Parks paid herself \$8164 in
17 guardianship fees. She paid her attorney \$9819.08.

18 Additional fees that April Parks spent Mr. Burns' money
19 on included \$4150 to remove him from his home and place

03:26 20 him in a group home. Using \$613 to pay a handyman

21 service that was run by April Parks' former spouse and

22 using \$270 for lawn care. I do know that at the

23 conclusion of the guardianship several thousand dollars

24 was returned to the power of attorney after Mr. Burns

03:26 25 died.

03:26 1 Q. You mentioned that Miss Parks paid her
2 attorney. In your review of bank records, as well as
3 the records of the business, were you able to determine
4 what legal work the attorney was doing to earn that
03:27 5 \$9000?

6 A. My review of the records is that this
7 particular attorney charged a flat fee of \$5000. That
8 included filing temporary petitions for guardianship,
9 filing orders of temporary guardianship and so on and so
03:27 10 forth. Part of her fees also included the filing of a
11 final accounting.

12 Q. And I think the next sort of box over is,
13 the name at the top, it says Mary Woods. Is this
14 another one of Miss Parks' guardians? Or excuse me, her
03:27 15 wards.

16 A. Her wards, yes.

17 Q. How did Miss Parks and her guardianship
18 business become involved with Miss Woods?

19 A. April Parks received a referral that Mary
03:27 20 Woods needed a guardian. Mary Woods lived in Pahrump.

21 Q. Okay. And do you know who referred her
22 with potential guardianship?

23 A. I'm looking at my report. I do know at the
24 time that she received the referral that Mary Woods was
03:28 25 a patient at Seven Hills Behavioral Center.

03:28 1 Q. Okay. Did Miss Parks ultimately file a
2 petition for guardianship for Miss Woods?

3 A. She did.

4 Q. Was she granted that guardianship?

03:28 5 A. She was.

6 Q. And what can you tell us about that
7 guardianship?

8 A. This was another guardianship that did not
9 last very long as Mary Woods died not too long after the
03:29 10 guardianship started.

11 Q. Okay. And after Miss Woods died, what
12 happened to, or I should say what, what assets did her
13 estate have?

14 A. Mary Woods had little assets. What I do
03:29 15 know in this investigation is that Mary Woods for a long
16 time had been paying premiums for a life insurance
17 policy. The life insurance policy had beneficiaries who
18 were her long time caregivers in Pahrump, that was a
19 married couple, and she lived on their back lot in a
03:29 20 trailer that the couple purchased for her. I learned in
21 my investigation that Mary Woods had gone through the
22 trouble to handwrite her own estate planning documents
23 where she wrote her own will. She wrote extensive
24 instructions on what needed to be done to care for her
03:30 25 cats and to take care of what little property she did

03:30 1 have and that she wanted John and Sally Denton to
2 receive the benefits of her life insurance policy once
3 she passed.

4 Q. Do you know based on your review whether
03:30 5 the Dentons did receive the proceeds from the life
6 insurance policy?

7 A. They did not receive the proceeds of the
8 insurance policy.

9 Q. Why not?

03:30 10 A. Shortly after April Parks obtained
11 guardianship of Mary Woods she submitted a request to
12 the insurance company to change the beneficiary. In my
13 investigation you need to ask court permission to do
14 things of that nature. In my review of the court record
03:30 15 no such request was ever made to the court in any kind
16 of filing or petition. Subsequently the insurance
17 company, Foresters International, they ultimately
18 changed the beneficiary at April Parks direction from
19 the Dentons back to the estate of Mary Woods. In my
03:31 20 investigation I learned that April Parks took the
21 25,000-dollar insurance benefit and used it to pay
22 herself and to pay her attorney.

23 Q. Do you recall the amounts that she paid
24 herself and her attorney? And again if reviewing your
03:31 25 report would refresh your recollection please feel free

03:31 1 to do so.

2 A. April Parks paid herself \$7864.40. April
3 Parks paid her attorney \$9196.70.

4 Q. When you seized some of the documents from
03:32 5 Miss Parks' office as part of the search warrant, was
6 there anything of significance relating to Miss Woods'
7 account that you found?

8 A. The documents that we found were these
9 handwritten estate planning documents that I described
03:32 10 earlier.

11 Q. Did anyone from A Private Professional
12 Guardian have any notes relating to Miss Woods?

13 A. That may be another person.

14 Q. Okay. Do you recall writing in your report
03:33 15 about reviewing a bank document with a post-it note
16 attached to it regarding Miss Woods?

17 If you don't that's fine.

18 A. There's been so many of this -- let me --
19 I'll just review this report really quick. I apologize.

03:33 20 I do. I have found it in the report.

21 April Parks never submitted an annual, or an annual
22 final accounting for Miss Woods. We did find an invoice
23 that was dated January 31, 2013. There was an entry
24 dated August 13, 2011 that stated "go through papers
03:34 25 found at home."

03:34 1 Q. Okay. That's fine. We can get into the
2 details later. I just wanted to give sort of a broad
3 overview.

4 The next name on your chart in Exhibit 4 is
03:34 5 Audrey Weber. Is Audrey Weber another one of the wards
6 of Miss Parks?

7 A. You know what, I just found what you're
8 looking for if you want me to go back. I apologize. In
9 the Woods case.

03:34 10 Q. If there's something relevant that you want
11 to talk about then yeah. Did you find --

12 A. I did. I'm sorry.

13 So in the documents that we seized was a
14 copy of a Nevada State Bank account statement for an
03:35 15 account that belonged to Woods and attached to the front
16 of the statement was a post-it note with the words
17 "knows no money but has this policy." And the money, it
18 was a dollar sign, so "knows no \$ but has this policy."
19 And no was underlined.

03:35 20 Q. And that was attached you said to a bank
21 statement?

22 A. It was for Mary Woods.

23 Q. Was there anything about a policy on that
24 bank statement?

03:35 25 A. On the statement itself was a debit of

03:35 1 \$48.75 for the insurance policy that was held with
2 Foresters and an arrow was written next to it.

3 Q. Okay. Now I started to ask you about the
4 next box in your chart on the top row with the name of
03:35 5 Audrey Weber. Again is that another one of the wards
6 that Miss Parks and her business were associated with?

7 A. Yes.

8 Q. What can you tell us about the guardianship
9 of Audrey Weber?

03:36 10 A. Audrey Weber was an elderly woman who was
11 on a ventilator which was how that was keeping her
12 alive. April Parks received a referral from the medical
13 facility where she was living. Audrey Weber had assets
14 that were more than \$7000 in a patient trust account
03:36 15 that was held at the medical facility. This
16 investigation learned that April Parks and Mark Simmons
17 billed Audrey Weber for daily visits. In the evidence
18 we located a bank statement where handwriting was on
19 there where it seemed to be calculating how many hours
03:37 20 billed at \$120 an hour it would take to basically eat up
21 the remaining money left in Miss Weber's account which
22 was over \$3800.

23 Q. Okay. And do you know how long the
24 guardianship of Miss Weber lasted?

03:37 25 A. I'm looking in my report for the specifics.

03:37 1 Q. Okay. While you're looking for that, can
2 you tell us was it an extended guardianship or was it
3 was it long, was it short, was it a day, a week, a
4 month, a year? Ballpark guess if you will.

03:38 5 A. April Parks was Audrey Weber's guardian for
6 36 days.

7 Q. The next name in your chart is Ruth
8 Braslow. I have the same question. Was Ruth Braslow a
9 ward of A Private Professional Guardian, LLC?

03:39 10 A. Yes, she was.

11 Q. Tell us based on your review of the records
12 how Miss Braslow became a ward of Miss Parks?

13 A. April Parks received a referral from the
14 medical facility where Ruth Braslow was a patient.

03:39 15 Q. And was guardianship granted?

16 A. Guardianship was granted and upon review of
17 April Parks' petition for guardianship, April Parks
18 misrepresented information related to contacting one of
19 Miss Braslow's son who under the law is required to
03:39 20 receive notice that Miss Parks is seeking guardianship
21 of his relative.

22 Q. What else did you discover about the
23 guardianship of Ruth Braslow?

24 A. In reviewing her accounting we learned that
03:39 25 April Parks had hired a professional estate sale company

03:40 1 and the estate sale lasted three days. April Parks
2 billed Ruth Braslow ten hours during those three days
3 related to performing activities for the estate sale.
4 Through interviews and reviewing of records we learned
03:40 5 that April Parks was not at the estate sale for ten
6 hours on those three days.

7 Q. Okay. Does that estate sale account for
8 the \$13,180.67 that's listed under Ruth Braslow?

9 A. Yes.

03:40 10 Q. I'm going to approach again and sort of
11 move the screen here. The next name is I believe
12 William Flewellen is the next ward we have listed up
13 here.

14 A. Uh-huh.

03:40 15 Q. What can you tell us about the guardianship
16 of William Flewellen?

17 A. On June 6, 2012 April Parks was appointed
18 Mr. Flewellen's guardian. Two days later Mr. Flewellen
19 died.

03:41 20 Q. And there's a number up there, \$4807.61.
21 Can you tell us what that number represents?

22 A. That is the money that Mr. Flewellen had in
23 his bank account at the time April Parks was guardian
24 and it was the money that April Parks withdrew from his
03:41 25 bank account after he had died. My review of the

03:41 1 guardianship laws tells me that she did not have the
2 authority to do that because the gentleman had died.

3 Q. So I asked you before about whether it was
4 a simple matter of becoming a guardian, taking the money
03:41 5 from one account putting it into another account. Is
6 that what happened with Mr. Flewellen or was it more
7 complicated? In other words, was there billing for
8 estate sales, that sort of thing like we've seen with
9 some of these other wards, or how did she account for
03:42 10 this \$4800?

11 A. Well, she fraudulently took authority over
12 it after the gentleman died and then used it to pay
13 herself and services rendered.

14 Q. Okay. So according to the records you
03:42 15 reviewed, the services that she rendered to
16 Mr. Flewellen occurred after the death of Mr. Flewellen;
17 is that right?

18 A. It's both. Guardians are given some time
19 to as they say wind up the affairs of the ward. So it
03:42 20 included both activities done prior to, during and after
21 the ward, excuse me, after the ward died.

22 Q. Okay. Now did Miss Parks pay herself the
23 full amount the \$4800 from Mr. Flewellen's estate?

24 A. She did.

03:43 25 Q. So at the time that she did this winding

03:43 1 down of the guardianship after his passing, there was no
2 money left in his account; is that right?

3 A. Yes, all of the money that the gentleman
4 had went to fees.

03:43 5 Q. When you say fees, were all of those for A
6 Private Professional Guardian, LLC, or was it like we've
7 seen in some of the others where some goes to the
8 company, some goes to the attorney and some goes to
9 other services?

03:43 10 A. I'm looking at my report here.

11 Q. Okay.

12 A. \$3800 was used in fees that Parks paid
13 herself.

14 Q. Okay. I'm going to move onto the next one
03:44 15 before we run out of time. So the sort of last one
16 along the top here says Barbara Neely. Who is Barbara
17 Neely?

18 A. Barbara Neely is a ward who challenged her
19 guardianship and ultimately was freed from April Parks'
03:44 20 guardianship.

21 Q. There's a number listed under there of
22 \$895. What does that represent?

23 A. That represents the additional money that
24 April Parks stole from Barbara Neely's estate when she
03:45 25 submitted a receipt to the court that stated her

03:45 1 guardianship fees were a full and final amount and I
2 compared bank records that showed one month prior to her
3 filing this receipt stating that she took over \$5000 in
4 fees, she'd actually already paid herself in excess of
03:45 5 \$6000 which made her taking an extra \$895 from Barbara
6 Neely while not telling the court and without having any
7 reason for doing it.

8 Q. So again I'm going to approach and try to
9 make it a bit easier for the members of the Grand Jury
03:45 10 to see. So we've got this sort of second row of boxes
11 belong the individual names. Wards. Now these ones
12 have a number of victims listed underneath as well as
13 amounts. Can you tell us, the first one is, it says
14 Social Security scam and filing false accountings. What
03:46 15 is that in reference to?

16 A. In this investigation I learned that April
17 Parks routinely filed Social Security applications to
18 become the representative payee for her wards. We
19 learned that the writing of this application, completing
03:46 20 of this application took between 10 or 15 minutes.
21 Sometimes April Parks billed to travel to the Social
22 Security office to have an interview with Social
23 Security representatives. In this particular scheme,
24 April Parks billed six victims a total of two hours each
03:46 25 to be at the Social Security office for an interview.

03:46 1 Her billing represents that she was at this government
2 office for 12 hours on that day where she billed six
3 victims a total of \$1344.

4 Q. Okay. The next one says bank deposit flat
03:47 5 fee scam with 130 victims. Can you tell us what that
6 represents?

7 A. I learned in this investigation that at
8 least once a month Mark Simmons deposited income checks
9 that the wards received at local banks. I determined
03:47 10 that the banks most often used was Bank of America or
11 Wells Fargo. I determined that these banks were within
12 minutes of April Parks' Henderson office. I learned in
13 this investigation that Mark Simmons would complete a
14 deposit slip that had the ward's name and account number
03:47 15 on it with the amount of the check and that he would
16 take these slips with the checks, he would travel to the
17 bank and then make a deposit. Mark Simmons would bill
18 each person 30 minutes for performing this task. A
19 review of the bank records showed that this task took
03:48 20 less than 30 minutes. Usually Mark Simmons would make
21 deposits for multiple wards, sometimes up to 20. At a
22 certain point in time Mark Simmons increased his hourly
23 professional rate so for this bank scheme wards were
24 being billed between 60 and \$75 for this half hour
03:48 25 service. When we looked at the billing, Mark Simmons

03:48 1 for these bank trips represented that it took him
2 sometimes ten hours to complete this deposit of checks
3 of the wards' income.

4 Q. Okay. The next one you have listed there
03:48 5 is Taylor court paperwork scam with 109 victims. Again
6 can you tell us what you mean by that?

7 A. Sure. One of the errands that April Parks
8 and Mark Simmons directed Gary Neil Taylor to perform
9 was to physically drive to the courthouse, wait in line
03:49 10 and have court clerks file court documents. In my
11 investigation I learned that for several years April
12 Parks and Mark Simmons had an e-filing account for the
13 court where they could e-file the same court documents
14 in minutes from their office. When Mr. Taylor would
03:49 15 perform this task he would most often be filing
16 paperwork for multiple wards. He would then bill these
17 wards excessively and multiple bill them where he would
18 represent to drive to court, to wait in line to file the
19 paperwork, it took him between 90 minutes and two hours
03:50 20 each to do this task. Similar to the bank scheme, when
21 you look at the billing, the employee would represent
22 that it took him 12, just as an example, 12 hours to be
23 at court to file paperwork on behalf of a small group of
24 wards.

03:50 25 Q. And to the best of your knowledge is the

03:50 1 family court open for 12 hours?

2 A. It is not.

3 Q. The next you have listed there is Taylor

4 mortuary/toilet paper scam. Could you enlighten us

03:50 5 please?

6 A. Yes. My review of April Parks' records

7 showed that on Halloween 2013 Gary Taylor visited a

8 local mortuary where he went to pick up the cremated

9 remains of four wards along with their death

03:50 10 certificates. He overbilled them and multiple billed

11 them representing this task took him several hours. In

12 the same day he billed nine wards who lived at the same

13 assisted living facility in Boulder City approximately

14 \$90 each to drop off toiletries. For all of the hours

03:51 15 that he worked that day he lbuild \$1405.20.

16 Q. Okay. So that number that is listed there,

17 that's all the work that he claimed to have done in one

18 day; is that right?

19 A. Yes.

03:51 20 Q. I'm going to come up again and adjust the

21 viewer.

22 I think this is the last one in this row.

23 It says Christmas gift scam. Can you tell us about that

24 please?

03:51 25 A. Yes. The Christmas gift scam was on

03:51 1 December 18, 2013 where Mark Simmons billed 48 wards \$30
2 each to drop them off a Christmas gift. When I reviewed
3 the billings I learned that there were visits made to
4 these wards the day before the Christmas gift drop off
03:52 5 and the day after the Christmas gift drop off. A large
6 majority of the wards also received a visit earlier in
7 the month as well. I determined this to be a scam
8 because it was an unnecessary billing to bill the wards
9 \$30 to receive a Christmas gift from their guardian.

03:52 10 Q. Okay. Now moving down a row. There's two
11 boxes on the next row. The first one is multiple
12 billing fraud scheme and filing false accountings. What
13 can you tell us about that and what you meant by that?

14 A. Okay. In the cases of 27 guardianships, we
03:52 15 learned that one of April Parks and Mark Simmons billing
16 schemes were to multiple bill wards. What this means is
17 that one service is performed that benefits multiple
18 wards but all the wards are billed for the entire
19 duration of the service. For example, if nine wards
03:53 20 lived at one group home and April Parks or an employee
21 went to visit them and the visit took an hour, each ward
22 was billed an hour. It didn't mean that she spent an
23 hour with each ward but that each ward would get billed
24 an hour. That's multiple billing.

03:53 25 Q. So they do an hour's worth of work total

03:53 1 and each ward would get billed so it looks like they did
2 nine hours worth of work. Is that an example?

3 A. Right.

4 Q. The next box you have there is provision of
03:53 5 unnecessary service fraud. Can you tell us what you're
6 referring to with that?

7 A. Yes. So in my review of 12 guardianship
8 cases, my review of the billings showed that April Parks
9 billed these wards for unnecessary services. As the
03:54 10 guardian, it is not the role of the guardian to provide
11 companionship services and what I noticed in the
12 billings were that additional visits were made to these
13 wards past one a month just to ensure their well-being
14 and that these visits were mostly done to provide

03:54 15 companionship to these wards. At the same time that
16 these additional visits were done by the guardian, in
17 these cases I learned that third party caregiver
18 services were being utilized sometimes on the same day
19 as April Parks' visits or visits made by her staff. I

03:55 20 also learned that these visits were being made on the
21 same day that nurse practitioners would be visiting the
22 wards to examine their health. I learned that the
23 facilities where the wards lived were 24 hours and that
24 they received around the clock care and eyes were

03:55 25 constantly on the wards to ensure that they were doing

03:55 1 well. There were also services performed where they
2 could have been done for free by staff of the group home
3 or assisted living center, the wards could have done
4 them themselves or that it was just completely
03:55 5 unnecessary. And the only benefit was to April Parks,
6 Mark Simmons and her company where it did not benefit
7 the ward.

8 Q. Okay. Now taking all these together, we
9 talked about quite a few things on Exhibit Number 4, but
03:55 10 when you looked at all of these sort of from a big
11 picture perspective, is that why on the next box down it
12 says racketeering?

13 A. Yes.

14 Q. And can you tell us why you came to that
03:56 15 conclusion?

16 A. What I learned from the investigation and
17 reviewing all sorts of records and interviews with
18 witnesses is that this business that April Parks owned,
19 that Marks Simmons was a manager of, operated purely to
03:56 20 fraudulently bill the wards in any way they could
21 through the multiple billing and the billing for
22 unnecessary services and then when opportunities arose
23 such as the cases I described with Dorothy Trumbich and
24 Baxter Burns and Mary Woods and Audrey Weber, the
03:56 25 fraudulently billed services were services that were

03:57 1 done but they were unnecessary where the ultimate
2 beneficiary was not the elderly person but April Parks
3 and her staff who were able to bill professional rates
4 for these services where it did not benefit the ward.

03:57 5 MR. WESTMEYER: Okay. Now like I said
6 we're going to go into detail on some of these schemes
7 in greater detail at another time. We're out of time
8 for today. But I wanted to have you explain sort of the
9 overall big picture perspective of the investigation
03:57 10 that you've completed thus far. So with that in mind I
11 have no additional questions for you today. Like I said
12 we'll get more into the specifics on each of these items
13 at a future date. So with that understanding do any of
14 the members of the Grand Jury have any questions for
03:57 15 Miss O'Malley at this point?

16 BY A JUROR:

17 Q. Just a point of clarification. On the,
18 let's see, the first name, Trumbich, you have a figure
19 of 167,000 as the bottom line for the scheme but you
03:58 20 indicated that 50,000 of that was actually turned back.
21 So is the bottom line actually 167 or the bottom line
22 more like 117?

23 A. The theft occurred once April Parks
24 fraudulently took authority over Dorothy Trumbich's
03:58 25 assets and at that time it was \$167,204.49. So the

03:58 1 theft was completed once she took authority over those
2 assets.

3 BY A JUROR:

4 Q. Did she use the same attorney throughout,
03:58 5 you know, because she paid an attorney, was it the same
6 attorney at all times?

7 A. In the cases that I mentioned earlier she
8 did use the same attorney.

9 BY A JUROR:

03:58 10 Q. What kind of services did he provide that
11 warranted \$9000?

12 A. You're talking about the attorneys?

13 Q. Yes.

14 A. So the big fee was their flat fee to even
03:59 15 take on the case which included the initial filings of
16 the guardianship petitions and the flat fee only took
17 the legal work so far. So if there was an extraordinary
18 reason to do more work, then the attorney would bill in
19 addition to that \$5000.

03:59 20 Q. Yeah. You did say 5000. Okay.

21 BY A JUROR:

22 Q. Did you find in your investigation that she
23 actually, that April Parks benefited from the attorney's
24 fee?

03:59 25 A. So April Parks paid these attorneys from

03:59 1 the accounts of the wards so April Parks would receive
2 no financial benefit from using ward funds to pay the
3 attorney.

4 BY A JUROR:

04:00 5 Q. I'm curious about the extinguishing of the
6 power of attorney in force through guardianship. So
7 i.e., if I am the power of attorney and then I find out
8 that somehow I'm no longer empowered, wouldn't typically
9 such power of attorney take court action? I mean did
04:00 10 you experience that?

11 A. Yes. What I learned in this investigation
12 is that in these petitions for guardianship, you know
13 the reason why it's so important to give proper notice
14 to these people is that they are able to challenge the
04:00 15 petition. So if April Parks knows that there is a power
16 of attorney and she does not notice them of her hearing,
17 they're unaware this is even happening. There is
18 specific language written in the petition that says by
19 appointing the guardian that the court suspends all
04:01 20 powers of attorney authority. So being appointed
21 guardian supersedes any existing power of attorney is
22 what I learned in the investigation.

23 BY A JUROR:

24 Q. Isn't it that once a person has power of
04:01 25 attorney, when the person dies doesn't the power of

04:01 1 attorney also stop at that moment?

2 A. I know in the guardianship that once a
3 person dies the guardianship of the person ends.

4 However, April Parks was guardian over the person and
04:01 5 the estate in most of these guardianship cases as still
6 having the authority over the ward's finances. The
7 guardians under the law are given a few months to wind
8 up the affairs that are kind of already in progress so
9 they would still have some authority related to the
04:02 10 estate.

11 BY A JUROR:

12 Q. The attorney that she was working with, was
13 that also her previous employer?

14 A. The attorney that I mentioned in the
04:02 15 specific cases was the same attorney. This attorney was
16 an employee at two of the law firms that April Parks
17 herself was employed with. So this particular attorney
18 was a colleague that April Parks used when they worked
19 at the same law firm and when April Parks went off on
04:02 20 her own April Parks then used the same attorney for some
21 of these cases.

22 THE FOREPERSON: Diana, did you have a
23 question?

24 BY A JUROR:

04:02 25 Q. I had basically the same question. But to

04:02 1 add to that. She didn't get any sort of, you know,
2 didn't see anything like she got some kind of money for
3 referring this attorney all this work? She didn't get
4 some kind of compensation for that? Cause he got a lot
04:03 5 of money.

6 A. Right. What I learned in this
7 investigation is that one of the reasons why April Parks
8 became such a prolific guardian here in Southern Nevada
9 was that there was a very consistent referral process.
04:03 10 The senior care industry here in Clark County is very
11 small and tight knit so everybody is referring business
12 to everybody and at some point a referral you made today
13 you'll get a payback at some point maybe later. So part
14 of the work that April Parks is getting sometimes
04:03 15 originated from these attorneys also. So kind of, do
16 you understand, so it benefited everybody to refer
17 business to everybody.

18 BY A JUROR:

19 Q. Is the firm still in operation currently?

04:04 20 A. This particular attorney closed her
21 business in 2014. However, April Parks has used
22 multiple attorneys throughout the years that are at
23 approximately three different firms and those firms are
24 still open and practicing.

04:04 25 Q. Is April Parks' business still in

04:04 1 operation?

2 A. Oh, April Parks, no, I'm sorry. At the end
3 of December of 2015 April Parks shut down her business.
4 She had previously resigned as guardian in several cases
04:04 5 where she did not have a replacement and the Public
6 Guardian's Office who in emergency appointed the
7 guardian of her wards. April Parks is no longer in the
8 state. According to a court record that I viewed it was
9 an affidavit that Miss Parks filed that said she --

04:05 10 MR. WESTMEYER: I'd like to cut you off
11 there. I don't know that that part is going to be
12 relevant for this hearing so.

13 THE FOREPERSON: If there are no further
14 questions. Diana.

04:05 15 BY A JUROR:

16 Q. Yeah. If you want -- these attorneys are
17 charging 5000. Is that a normal fee? \$5,000 to file
18 this paper work. Is that normal?

19 A. In my investigation related to this elder
04:05 20 law issue and guardianship, it was common to see these
21 attorneys bill these flat fees like that and then
22 continue to bill beyond that.

23 BY A JUROR:

24 Q. There's no limitation that they can, if
04:05 25 they know what they're doing can they get in trouble

04:05 1 too? They've got to know something about that.

2 A. In these situations April Parks is the
3 client so April Parks is the one who is in charge of the
4 ward's money and decides how it will be spent and why it
04:05 5 will be spent. So the decision is ultimately up to
6 April Parks. And it should be noted that April Parks
7 can also file these same legal documents and petitions
8 herself and most often did.

9 THE FOREPERSON: By law, these proceedings
04:06 10 are secret and you are prohibited from disclosing to
11 anyone anything that has transpired before us, including
12 evidence and statements presented to the Grand Jury, any
13 event occurring or statement made in the presence of the
14 Grand Jury, and information obtained by the Grand Jury.

04:06 15 Failure to comply with this admonition is a
16 gross misdemeanor punishable up to 364 days in the Clark
17 County Detention Center and a \$2,000 fine. In addition,
18 you may be held in contempt of court punishable by an
19 additional \$500 fine and 25 days in the Clark County
04:06 20 Detention Center.

21 Do you understand this admonition?

22 THE WITNESS: I do.

23 THE FOREPERSON: Thank you. You're
24 excused.

04:06 25 MR. WESTMEYER: Ladies and gentlemen, we

04:06 1 have no additional witnesses or evidence to present
2 today. I want to thank the members of the Grand Jury
3 for bearing with us. We've gone a couple minutes over.
4 We'll be back next week with additional evidence to
04:07 5 present. So with that I think we'll call it a day.

6 (Proceedings adjourned, to reconvene on
7 Tuesday, December 13, 2016.)

8 --oo0oo--
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

REPORTER'S CERTIFICATE

STATE OF NEVADA)
 : Ss
COUNTY OF CLARK)

I, Danette L. Antonacci, C.C.R. 222, do
hereby certify that I took down in Shorthand (Stenotype)
all of the proceedings had in the before-entitled matter
at the time and place indicated and thereafter said
shorthand notes were transcribed at and under my
direction and supervision and that the foregoing
transcript constitutes a full, true, and accurate record
of the proceedings had.

Dated at Las Vegas, Nevada,
December 11, 2016.

/s/ Danette L. Antonacci

Danette L. Antonacci, C.C.R. 222

04:07

1

AFFIRMATION

2

Pursuant to NRS 239B.030

3

4

The undersigned does hereby affirm that the
preceding TRANSCRIPT filed in GRAND JURY CASE NUMBER
16AGJ151A-C:

04:07

5

6

7

8

X Does not contain the social security number of any
person,

9

04:07

10

-OR-

11

___ Contains the social security number of a person as
required by:

12

13

A. A specific state or federal law, to-
wit: NRS 656.250.

14

15

-OR-

04:07

16

B. For the administration of a public program
or for an application for a federal or
state grant.

17

18

/s/ Danette L. Antonacci

19

Signature

12-11-16

Date

04:07

20

21

Danette L. Antonacci
Print Name

22

23

Official Court Reporter
Title

24

25

<p>BY A JUROR: [17] 72/7 72/22 73/12 73/24 74/24 75/12 117/15 118/2 118/8 118/20 119/3 119/22 120/10 120/23 121/17 122/14 122/22</p> <p>BY MR. RAMAN: [3] 16/6 58/15 76/4</p> <p>BY MR. WESTMEYER: [1] 79/20</p> <p>BY THE FOREPERSON: [1] 71/16</p> <p>MR. RAMAN: [6] 5/7 15/18 58/10 71/13 76/2 77/23</p> <p>MR. WESTMEYER: [4] 78/17 117/4 122/9 123/24</p> <p>THE FOREPERSON: [12] 14/23 15/5 15/14 77/25 78/14 78/19 79/1 79/10 120/21 122/12 123/8 123/22</p> <p>THE WITNESS: [10] 15/4 15/13 15/16 76/3 78/13 78/16 78/25 79/9 79/12 123/21</p>	<p>\$100 [1] 50/12 \$12,000 [1] 97/2 \$12,764 [1] 96/18 \$120 [1] 105/20 \$13,180.67 [1] 107/8 \$1344 [1] 111/3 \$1405.20 [1] 113/15 \$150 [4] 56/3 59/3 59/9 61/13 \$1500 [1] 60/11 \$167,204.49 [2] 96/8 117/25 \$17 [1] 56/24 \$175 [2] 54/15 59/3 \$2,000 [2] 78/9 123/17 \$20 [4] 87/23 93/6 93/25 97/15 \$21,000 [1] 97/7 \$22 [2] 56/24 57/2 \$230 [1] 58/23 \$235 [1] 30/23 \$270 [1] 99/22 \$30 [2] 114/1 114/9 \$32,000 [1] 99/6 \$32,006.72 [1] 98/25 \$3200 [1] 93/8 \$3500 [1] 12/5 \$3800 [2] 105/22 109/12 \$4150 [1] 99/19 \$450 [1] 62/14 \$48.75 [1] 105/1 \$4800 [2] 108/10 108/23</p>	<p>\$4807.61 [1] 107/20 \$5,000 [3] 13/19 13/19 122/17 \$50,000 [1] 97/17 \$500 [2] 78/11 123/19 \$5000 [3] 100/7 110/3 118/19 \$600 [1] 97/13 \$6000 [1] 110/5 \$613 [1] 99/20 \$650 [7] 6/23 6/24 7/1 12/1 12/3 13/17 13/18 \$7000 [1] 105/14 \$75 [1] 111/24 \$7864.40 [1] 103/2 \$8164 [1] 99/16 \$895 [2] 109/22 110/5 \$90 [1] 113/14 \$9000 [2] 100/5 118/11 \$9196.70 [1] 103/3 \$95 [6] 30/24 31/2 31/6 31/7 57/19 58/19 \$9819.08 [1] 99/17</p> <hr/> <p>—</p> <hr/> <p>--oo0oo [1] 124/8 -OR [2] 126/10 126/14</p> <hr/> <p>/</p> <hr/> <p>/s [2] 125/17 126/18</p>
<p>\$</p> <p>\$10,000 [6] 24/18 24/18 25/3 25/18 69/3 94/24 \$10,589.40 [1] 96/19</p>		

1	2	222 [3] 1/25 125/6 125/18
100 [1] 50/15	2,000 [1] 25/10	2300 [1] 40/8
100 percent [5] 48/6 54/16 59/15 62/20 76/2	20 [2] 85/14 111/21	239.330 [1] 13/22
100,000 [1] 32/3	200.5092 [1] 12/8	239B.030 [1] 126/2
109 [1] 112/5	200.5099 [1] 13/15	24 [3] 52/8 52/23 115/23
11 [1] 125/15	2007 [1] 85/18	24,000 [2] 25/11 25/20
117 [1] 117/22	2008 [1] 16/18	24-hour [1] 61/15
12 [6] 84/4 111/2 112/22 112/22 113/1 115/7	2010 [1] 85/18	25 [2] 78/11 123/19
12-11-16 [1] 126/18	2011 [5] 85/21 85/25 86/9 86/15 103/24	25,000-dollar [1] 102/21
13 [2] 103/24 124/7	2012 [1] 107/17	26 [1] 99/4
130 [1] 111/5	2013 [3] 103/23 113/7 114/1	27 [1] 114/14
15 [2] 58/13 110/20	2014 [2] 93/7 121/21	2900 [1] 70/10
150 [1] 54/15	2015 [5] 76/8 81/19 82/20 86/22 122/3	2:15 [1] 58/12
159 [1] 82/10	2016 [7] 1/14 2/1 5/1 16/14 69/8 124/7 125/15	2A [1] 6/2
16 [1] 126/18	2017 [3] 30/21 69/12 69/12	3
167 [1] 117/21	202.260 [1] 6/20	30 [2] 111/18 111/20
167,000 [2] 97/19 117/19	202.275 [1] 6/20	300 [1] 62/13
167,204.49 [1] 97/4	202.350 [1] 6/20	300-dollar [1] 56/3
16AGJ151A-C [3] 1/7 5/16 126/5	205.0831 [1] 11/4	31 [1] 103/23
17 [1] 57/2	205.0832 [1] 9/25	340 [1] 67/7
18 [6] 13/9 17/24 18/3 18/9 18/12 114/1	205.0834 [1] 11/16	3500 [1] 12/4
1983 [1] 8/2	205.0835 [1] 11/24	36 [1] 106/6
199.145 [1] 14/4	207.360 [1] 6/5	364 [2] 78/8 123/16
199.280 [1] 6/15	207.370 [1] 7/6	4
1:06 [1] 1/15	207.380 [1] 7/12	400 [1] 39/23
1build [1] 113/15	207.390 [1] 7/20	463.330 [1] 6/22
1st [3] 69/8 69/12 69/12	207.400 [1] 8/5	465 [1] 6/22
	21 [1] 86/22	48 [1] 114/1
		5
		5,000 [1] 70/14

5	29/12 31/19 32/8 34/18 42/6 42/8 42/10 43/6 47/9 49/6 49/14 52/10 52/17 52/22 53/1 57/15 61/17 65/3 65/7 65/9 65/12 65/14 65/15 65/23 66/11 67/2 67/23 68/15 69/21 70/10 83/18 85/8 87/12 88/11 88/13 88/17 89/6 93/17 100/3 117/3 119/14	accounting [18] 24/19 24/23 25/3 25/14 25/15 25/19 31/15 44/10 50/2 62/16 69/2 69/4 69/9 69/11 70/16 100/11 103/22 106/24
50,000 [2] 97/20 117/20		accountings [2] 110/14 114/12
5000 [2] 118/20 122/17		accounts [8] 21/21 23/19 34/6 50/3 60/14 60/15 72/18 119/1
5th [2] 16/14 16/16		accurate [4] 90/3 90/16 91/3 125/12
6		accurately [1] 5/6
60 [7] 13/6 23/14 25/4 49/25 69/12 73/17 111/24	about [53]	acquire [1] 8/15
601 [1] 26/2	absolutely [2] 57/5 71/4	acquisition [1] 8/12
656.250 [1] 126/13	abuse [3] 19/15 20/1 73/15	across [4] 33/7 63/19 75/20 83/10
7	abusing [1] 41/7	act [5] 9/7 9/8 10/20 12/9 39/2
70 percent [1] 31/23	accept [2] 68/2 68/4	acting [4] 16/10 16/12 16/19 46/5
75 percent [1] 70/2	accepted [3] 28/23 77/19 77/19	action [3] 54/23 55/4 119/9
8	access [15] 21/21 21/21 21/24 34/21 34/24 35/12 35/17 36/6 36/8 43/19 44/14 47/19 52/11 53/3 66/11	actions [2] 9/25 27/22
8,000 [1] 70/8	accident [1] 17/13	active [1] 96/23
9	accompanies [1] 77/10	actively [2] 96/3 98/8
90 [2] 44/9 112/19	accomplices [1] 7/23	activities [5] 7/11 13/14 39/7 107/3 108/20
95 percent [1] 52/20	according [2] 108/14 122/8	activity [9] 7/20 7/21 8/9 8/15 8/20 8/21 9/13 9/15 9/18
A	account [44]	
abandon [1] 53/15	accountable [1] 49/20	
abandoned [1] 53/17		
ability [16] 5/7 13/13 22/6 23/2 42/15 43/14 45/12 47/4 48/15 49/5 50/18 66/22 66/24 68/3 68/7 73/10		
able [42] 28/17		

A	administrators [1]	58/12 79/23
acts [2] 8/5 32/5	83/6	again [13] 29/3
actual [3] 39/19	admonition [4]	43/6 90/16 91/3
60/22 77/14	78/7 78/13 123/15	95/10 97/22 99/8
actually [20]	123/21	102/24 105/5
24/4 29/10 30/18	ADRIENNE [1] 2/11	107/10 110/8
30/21 44/8 51/14	adult [2] 19/5	112/5 113/20
54/22 55/1 55/2	19/21	against [6] 5/14
61/20 70/18 71/22	adults [2] 17/21	19/16 36/17 39/8
74/19 75/11 77/14	17/23	81/14 81/21
89/24 110/4	advice [1] 9/2	age [6] 13/7 13/9
117/20 117/21	advise [1] 65/18	17/24 18/9 18/12
118/23	advised [2] 15/7	85/14
add [1] 121/1	79/3	agencies [1]
added [1] 41/10	advisement [2]	66/12
addition [6]	15/13 79/9	agency [5] 29/23
20/23 37/24 78/9	advocate [1]	68/5 68/20 84/16
87/11 118/19	56/16	85/2
123/17	affairs [9] 8/19	agent [2] 19/12
additional [16]	8/21 9/3 43/7	20/21
19/19 20/5 37/16	44/7 47/11 59/21	aggregated [1]
43/4 46/11 78/11	108/19 120/8	11/23
97/10 97/11 99/18	affidavit [2]	ago [2] 45/9
109/23 115/12	77/10 122/9	45/22
115/16 117/11	affirm [1] 126/4	agreed [1] 82/21
123/19 124/1	AFFIRMATION [1]	agreement [1]
124/4	126/1	48/12
adequately [1]	afford [2] 46/12	ahead [1] 73/11
40/1	53/18	ailment [1] 18/13
adhering [1]	after [26] 8/2	air [2] 27/24
74/13	8/3 18/23 44/9	91/12
adjourned [1]	51/12 69/9 69/10	alive [2] 27/4
124/6	69/12 82/3 82/25	105/12
adjust [2] 90/20	88/4 88/16 96/21	all [71]
113/20	97/5 97/20 99/24	allegations [1]
administration [5]	101/9 101/11	19/15
60/10 71/7 72/10	102/10 107/25	alleging [1]
72/15 126/15	108/12 108/16	81/21
administrator [2]	108/20 108/21	allow [3] 58/5
71/10 84/6	109/1 114/5	58/7 62/4
Administrator's	afternoon [3] 5/9	allows [2] 38/18
[1] 71/5		

A		
allows... [1] 51/1	25/3 25/13 31/15 62/16 69/4 103/21 103/21	apologize [3] 99/10 103/19 104/8
Almost [1] 80/6	annually [1] 24/20	appearance [2] 29/2 29/19
along [5] 51/9 61/6 64/24 109/16 113/9	another [29] 6/12 9/11 10/2 10/6 10/7 10/11 10/22 10/25 13/2 13/4 14/11 19/3 19/16 21/10 23/5 23/7 36/8 67/14 82/8 82/11 92/7 97/24 100/14 101/8 103/13 104/5 105/5 108/5 117/7	applicable [1] 7/4
already [6] 5/18 61/17 96/2 98/7 110/4 120/8	answer [1] 99/14	application [4] 77/11 110/19 110/20 126/15
also [43]	Antonacci [7] 1/25 5/4 125/6 125/17 125/18 126/18 126/21	applications [1] 110/17
alternatives [1] 54/4	any [120]	applied [1] 46/22
although [1] 7/16	anybody [4] 14/15 21/4 35/9 77/24	apply [7] 23/3 25/23 58/3 58/8 65/18 66/17 71/21
always [7] 42/15 44/25 75/25 77/16 77/21 84/25 86/12	anymore [2] 34/24 43/1	applying [2] 19/14 59/21
Alzheimer's [2] 18/21 92/4	anyone [6] 14/21 14/22 41/23 78/3 103/11 123/11	appoint [1] 44/19
am [3] 72/9 80/9 119/7	anything [24] 21/23 23/4 23/10 23/20 25/10 28/5 34/5 36/24 37/10 38/3 39/1 45/20 50/15 50/21 51/10 51/25 75/20 77/8 77/21 78/3 103/6 104/23 121/2 123/11	appointed [19] 16/24 17/1 19/12 22/19 22/21 23/11 32/11 33/11 41/19 42/1 42/4 42/21 44/16 45/1 69/7 84/5 107/17 119/20 122/6
America [2] 34/16 111/10		appointing [1] 119/19
amount [18] 11/8 11/9 11/17 11/17 13/17 32/12 36/21 39/22 40/3 52/2 53/2 67/9 94/6 96/12 96/23 108/23 110/1 111/15		appointment [3] 23/15 25/4 25/5
amounting [1] 6/12		appointments [1] 21/15
amounts [3] 11/20 102/23 110/13		appoints [1] 33/20
and/or [1] 72/24		appraisal [1] 50/11
ANN [1] 2/4		appraised [1] 23/19
anniversary [4] 69/6 69/9 69/10 69/13	anywhere [2] 48/19 62/13	appraiser [3] 24/5 50/9 50/11
annual [8] 24/19		

A		
appraisers [1] 50/7	37/3 42/15 71/16 74/16 81/23 83/16 88/15 96/22 102/13 105/3	76/1
approach [3] 88/21 107/10 110/8	asked [1] 108/3 asking [1] 6/16 assault [2] 6/11 6/18	attached [3] 103/16 104/15 104/20
appropriate [7] 26/21 31/17 32/6 45/17 46/4 58/13 65/10	assessment [1] 77/4 assessments [1] 77/8	attempt [3] 6/7 9/10 9/16 attend [4] 21/14 29/13 29/16 61/11
appropriately [1] 22/24	asset [1] 23/20 assets [22] 12/15 12/18 12/19 12/23 21/22 23/13 24/17 24/18 25/17 44/15 46/20 60/3 68/12 95/8 96/8 98/25 98/25 101/12 101/14 105/13 117/25 118/2	attendant [1] 57/12 attended [1] 80/15 attention [3] 15/25 28/20 55/3
appropriates [1] 10/23	assigned [5] 80/9 81/7 81/8 81/14 81/20	attorney [72] attorney's [2] 5/11 118/23 attorneys [10] 42/4 46/13 83/13 96/10 118/12 118/25 121/15 121/22 122/16 122/21
approve [1] 31/17 approved [3] 19/15 33/19 35/25	assist [1] 74/20 assistance [2] 9/2 61/11 assistant [3] 2/5 57/3 91/7 assistants [1] 77/19	auction [3] 51/15 51/16 51/20 Audrey [9] 104/5 104/5 105/5 105/9 105/10 105/13 105/17 106/5 116/24
approximately [9] 82/20 84/4 93/7 96/24 96/25 97/13 97/14 113/13 121/23	assisted [3] 83/6 113/13 116/3 associated [3] 7/16 8/18 105/6 associates [1] 82/13 association [2] 7/15 32/25 assume [2] 71/19	August [3] 16/14 16/16 103/24 August 13 [1] 103/24 August 5th [2] 16/14 16/16 authority [10] 10/1 33/17 95/8 108/2 108/11 117/24 118/1 119/20 120/6
APRIL [99] April 2015 [1] 81/19		
are [113] area [2] 22/10 91/16		
areas [1] 61/5 arise [1] 47/24 arose [1] 116/22 around [6] 70/10 81/19 82/2 85/14 97/17 115/24		
arrow [1] 105/2 arson [1] 6/11 ARTHUR [1] 2/7 as [140] ascertainable [2] 11/7 11/13 ask [11] 36/25		

A	67/22	105/20 120/25
authority... [1] 120/9	bad [1] 41/24	basis [3] 46/10
authorization [1] 10/5	balances [1] 69/19	52/18 56/7
authorized [1] 10/9	Ballpark [1] 106/4	battery [2] 6/10 6/17
available [4] 28/14 31/21 49/22 58/10	bank [38] 21/21 23/19 24/10 33/12 34/5 34/11 34/14 34/15 34/16 34/22 35/7 38/4 38/8 46/2 46/13 50/3 60/12 60/20 60/22 72/18 83/4 93/13 100/2 103/15 104/14 104/20 104/24 105/18 107/23 107/25 110/2 111/4 111/10 111/17 111/19 111/23 112/1 112/20	BAX [1] 2/6 Baxter [3] 97/23 98/4 116/24
avoid [1] 73/7		be [159]
aware [17] 23/14 23/22 40/5 54/13 59/2 62/25 64/11 64/16 65/6 67/22 67/25 72/18 72/21 73/2 75/18 98/10 98/13		bearing [1] 124/3
away [3] 70/6 70/15 74/11		became [2] 106/12 121/8
B		because [14] 13/10 14/20 47/3 55/6 63/12 65/9 68/8 74/9 74/11 83/11 94/12 108/2 114/8 118/5
Bachelor's [2] 20/23 21/2	banking [1] 91/15	become [16] 17/23 18/4 19/2 20/21 23/3 26/12 45/3 46/23 64/9 64/11 64/12 64/22 71/18 71/25 100/18 110/18
back [16] 28/8 29/3 30/6 37/19 38/23 41/12 56/2 60/21 75/8 76/11 97/17 101/19 102/19 104/8 117/20 124/4	bankruptcies [1] 19/22	becomes [1] 34/4
back-up [1] 75/8	bankruptcy [1] 19/7	becoming [5] 20/24 50/1 63/4 94/15 108/4
background [7] 71/20 71/24 72/2 72/4 80/11 82/12 92/23	banks [5] 33/25 47/16 111/9 111/10 111/11	been [37] 5/5 16/2 16/12 16/17 17/9 19/6 19/6 26/19 32/11 34/23 35/1 42/5 42/6 42/21 42/21 43/7 45/8 49/14 54/13 64/2 64/3 65/4 66/25 70/10 70/16 72/13 74/8 76/14 76/18 79/16 84/3 84/5 86/12 88/21
backgrounds [1] 60/2	Barbara [5] 109/16 109/16 109/18 109/24 110/5	
backlog [2] 66/23 75/25	based [11] 21/13 30/4 30/11 30/13 46/5 59/14 67/11 98/15 98/21 102/4 106/11	
backlogs [1]	basically [5] 25/16 84/15 92/4	

B	104/15	57/8 63/6 111/17
been... [3]	belongings [1]	112/16 112/17
101/16 103/18	24/10	114/8 114/16
116/2	belongs [1] 38/11	116/20 117/3
before [16] 14/19	beneath [1] 95/12	118/18 122/21
15/2 37/1 40/17	beneficiaries [3]	122/22
42/4 45/15 50/23	37/21 38/7 101/17	billed [23] 31/12
73/22 78/3 78/23	beneficiary [3]	63/20 63/24 64/1
89/24 108/3	102/12 102/18	64/2 88/12 95/4
109/15 114/4	117/2	105/17 105/20
123/11 125/8	benefit [11]	107/2 110/21
before-entitled	12/17 12/22 22/24	110/24 111/2
[1] 125/8	35/8 37/11 87/18	111/24 113/10
began [1] 83/9	102/21 116/5	113/12 114/1
begin [2] 80/24	116/6 117/4 119/2	114/18 114/22
98/2	benefited [2]	114/23 115/1
beginning [3]	118/23 121/16	115/9 116/25
61/3 82/7 86/15	benefits [9]	billing [28]
behalf [1] 112/23	49/22 51/19 58/3	30/23 31/3 31/5
Behavioral [1]	58/8 59/21 59/22	54/5 54/7 54/10
100/25	66/10 102/2	54/20 54/22 54/24
behaviors [1]	114/17	59/18 60/22 61/7
48/25	best [7] 5/7	63/25 88/14 91/15
being [29] 16/19	29/18 49/21 52/2	94/10 94/19 94/20
19/1 21/10 21/20	61/1 73/8 112/25	108/7 111/1
22/23 32/7 41/12	better [2] 48/10	111/25 112/21
42/4 44/14 48/17	49/3	114/8 114/12
52/10 56/10 56/14	between [15] 19/9	114/15 114/24
61/18 62/18 63/14	29/20 45/5 54/15	116/21 116/21
67/13 69/16 70/5	55/21 59/2 63/22	billings [3]
75/19 77/13 84/6	63/22 66/16 69/11	114/3 115/8
85/1 85/3 111/24	84/10 85/18	115/12
115/13 115/18	110/20 111/24	bills [8] 21/20
115/20 119/20	112/19	22/23 33/15 35/13
believe [10]	beyond [1] 122/22	46/3 57/25 57/25
14/21 15/23 40/8	big [4] 89/6	59/18
41/22 43/6 66/1	116/10 117/9	birth [1] 17/11
71/12 77/20 94/12	118/14	bit [9] 26/16
107/11	bill [19] 30/25	44/8 47/16 67/1
belong [1] 110/11	31/4 54/18 55/13	84/9 85/8 87/5
belonged [2] 87/2	55/14 55/15 55/22	89/7 110/9

B blessing [1] 73/12 block [3] 31/4 35/18 54/23 blocked [4] 34/18 35/22 36/4 36/7 blood [1] 20/9 board [2] 36/2 83/10 body [1] 59/11 Bonanza [1] 26/2 bond [5] 36/11 36/13 36/14 36/17 36/18 bonding [1] 36/10 bonds [2] 36/12 38/3 booked [1] 5/18 books [1] 70/14 both [11] 15/16 17/4 22/7 22/14 22/17 66/5 79/12 82/20 84/7 108/18 108/20 bottom [3] 117/19 117/21 117/21 Boulder [4] 48/21 85/16 86/25 113/13 box [6] 29/15 97/23 100/12 105/4 115/4 116/11 boxes [4] 19/21 95/11 110/10 114/11 brain [3] 13/11 18/17 49/14 Braslow [7] 106/8 106/8 106/12	106/14 106/23 107/2 107/8 Braslow's [1] 106/19 break [2] 58/12 58/14 breakdown [1] 96/11 bribe [1] 6/16 bribery [1] 6/16 bring [1] 15/24 broad [3] 47/10 97/22 104/2 brother [1] 26/25 brought [1] 41/12 budget [3] 35/15 35/24 48/24 burglary [1] 6/15 Burns [9] 97/23 98/4 98/7 98/23 98/24 99/3 99/6 99/24 116/24 Burns' [3] 98/13 99/4 99/18 business [28] 7/14 30/1 47/5 82/13 83/23 85/12 85/22 86/10 86/11 86/12 86/17 86/24 87/22 88/6 89/12 91/14 93/14 94/13 94/17 100/3 100/18 105/6 116/18 121/11 121/17 121/21 121/25 122/3 businesses [1] 33/8 BYRD [1] 2/7	C C.C.R [3] 1/25 125/6 125/18 C321808 [1] 1/7 calculate [1] 93/25 calculated [1] 59/13 calculating [1] 105/19 calculus [1] 55/5 calendar [1] 25/16 call [6] 43/24 44/1 65/24 74/15 77/3 124/5 called [5] 5/24 22/14 28/13 44/6 95/13 calls [2] 32/18 74/20 came [5] 43/23 58/17 82/4 86/21 116/14 can [115] can't [11] 19/6 27/13 34/2 37/20 37/20 43/23 45/3 61/19 61/23 65/10 99/13 cannot [1] 41/22 capacity [1] 20/6 car [1] 51/17 cards [1] 28/8 care [38] 21/14 26/15 28/17 39/21 44/7 52/7 52/8 52/12 52/14 52/20 52/23 53/6 53/7 56/10 56/10 56/14 56/14 57/12 61/25
--	---	---

<p>C</p> <p>care... [19] 63/14 64/5 66/8 83/7 83/8 91/25 92/8 92/9 92/13 92/20 96/3 97/11 97/12 98/8 99/22 101/24 101/25 115/24 121/10</p> <p>caregiver [4] 61/23 87/21 97/14 115/17</p> <p>caregivers [5] 32/18 61/15 61/16 87/22 101/18</p> <p>case [48]</p> <p>caseload [2] 40/3 66/21</p> <p>cases [34] 31/22 31/23 31/23 39/24 41/12 52/21 52/21 60/14 67/11 67/17 68/11 68/14 68/19 68/23 69/3 69/24 70/2 70/9 70/11 70/19 74/21 80/10 81/22 83/10 84/5 114/14 115/8 115/17 116/23 118/7 120/5 120/15 120/21 122/4</p> <p>cash [1] 36/6</p> <p>catalyst [1] 52/4</p> <p>categories [1] 24/16</p> <p>category [2] 80/20 92/7</p> <p>cats [1] 101/25</p> <p>cause [4] 48/22 59/18 76/14 121/4</p>	<p>caused [1] 96/5</p> <p>causing [1] 10/18</p> <p>center [8] 20/11 72/1 78/9 78/12 100/25 116/3 123/17 123/20</p> <p>centers [1] 83/6</p> <p>certain [11] 6/19 43/15 46/13 51/22 54/23 64/17 66/12 71/4 94/4 94/4 111/22</p> <p>certificate [9] 28/10 28/13 28/25 29/11 66/3 75/8 75/11 92/7 125/1</p> <p>certificates [1] 113/10</p> <p>certification [10] 20/11 20/24 72/2 72/3 76/8 84/16 84/24 84/24 85/2 92/10</p> <p>certified [14] 20/10 24/4 28/4 28/7 50/7 50/11 84/7 84/8 84/13 91/9 91/10 91/18 91/22 92/8</p> <p>certify [1] 125/7</p> <p>challenge [1] 119/14</p> <p>challenged [1] 109/18</p> <p>chance [3] 52/9 53/1 87/6</p> <p>change [9] 34/15 37/18 37/22 38/7 40/13 42/16 43/7 97/19 102/12</p> <p>changed [3] 42/20</p>	<p>84/24 102/18</p> <p>changes [1] 76/7</p> <p>changing [2] 37/21 37/22</p> <p>Chapter [1] 82/10</p> <p>characteristics [1] 7/25</p> <p>charge [15] 40/10 40/16 40/23 53/21 53/24 54/14 54/25 58/19 58/23 61/12 69/14 73/1 73/4 73/11 123/3</p> <p>charged [1] 100/7</p> <p>charges [4] 5/25 6/4 31/6 56/3</p> <p>charging [4] 54/1 55/1 59/2 122/17</p> <p>Charles [1] 41/3</p> <p>chart [6] 4/6 89/1 90/6 104/4 105/4 106/7</p> <p>charting [1] 63/13</p> <p>charts [2] 55/16 56/8</p> <p>cheaper [2] 54/4 57/4</p> <p>check [8] 19/20 60/10 60/11 60/20 72/2 74/16 97/17 111/15</p> <p>checking [1] 63/13</p> <p>checks [7] 36/6 60/8 69/18 71/24 111/8 111/16 112/2</p> <p>Chief [1] 2/20</p> <p>children [2] 17/14 27/6</p>
--	--	--

C		
Christmas [6] 113/23 113/25 114/2 114/4 114/5 114/9	34/8 49/4 70/10 closed [1] 121/20 closeup [3] 89/25 90/14 91/1 cognitive [8] 17/12 17/24 18/1 26/9 28/16 45/12 49/1 75/10	community [4] 64/15 64/19 67/12 81/2 companies [12] 27/24 33/24 51/21 56/18 56/23 56/25 61/20 61/23 64/18 67/23 68/8 97/14 companion [4] 56/9 56/13 72/25 73/1 companionship [9] 56/18 56/19 56/22 57/3 57/13 87/24 97/15 115/11 115/15 company [13] 51/16 53/16 57/17 76/23 91/9 92/17 97/10 97/24 102/12 102/17 106/25 109/8 116/6 compared [1] 110/2 compensation [1] 121/4 competency [2] 43/4 43/10 competent [3] 45/8 45/14 48/3 competing [1] 44/24 complaint [4] 81/1 81/3 81/5 81/9 complaints [9] 73/18 73/21 73/23 81/4 81/20 81/24 82/4 82/16 83/11 complete [3] 35/2
circumstance [2] 24/3 61/9	colleague [1] 120/18 collection [1] 6/14 combination [1] 7/7 come [13] 21/19 24/5 31/9 35/25 36/4 38/23 41/12 48/12 56/2 65/6 75/20 76/10 113/20 comes [7] 10/20 25/16 35/3 43/4 61/2 67/20 68/24 coming [5] 20/13 25/21 47/18 60/21 68/12 commission [4] 6/7 7/24 8/3 9/7 commissioners [1] 30/10 commit [3] 6/7 6/8 6/17 commits [1] 10/1 committed [1] 11/21 common [5] 18/13 18/19 22/13 68/10 122/20 commonly [1] 64/9 communicate [1] 41/22	
circumstances [6] 6/12 10/22 26/16 29/9 41/16 63/8		
City [4] 48/21 85/16 86/25 113/13		
claim [1] 36/17		
claimed [1] 113/17		
clarification [1] 117/17		
CLARK [26] 1/2 5/10 16/10 16/12 16/15 20/21 25/25 29/24 30/2 30/7 30/10 34/10 40/5 40/9 54/14 58/4 67/7 71/19 71/24 78/8 78/11 84/6 121/10 123/16 123/19 125/4		
clean [1] 56/14		
cleanliness [1] 56/16		
clear [1] 52/13		
clerks [1] 112/10		
client [2] 77/3 123/3		
clients [5] 18/2 41/7 49/13 85/20 86/8		
clinics [1] 49/14		
clock [1] 115/24		
close [4] 34/1		

C	60/3	contacting [1] 106/18
complete... [2] 111/13 112/2	conduct [9] 8/18 9/2 9/15 9/16	contacts [1] 32/20
completed [2] 117/10 118/1	11/22 47/5 71/19 81/10 84/18	contain [1] 126/8
completely [1] 116/4	conducted [3] 83/5 87/22 98/19	contained [1] 98/6
completes [1] 45/9	confidence [1] 12/10	Contains [1] 126/11
completing [2] 28/16 110/19	confirmation [1] 38/1	contempt [2] 78/10 123/18
compliance [12] 41/9 41/10 41/11 41/14 42/8 69/21 69/24 70/3 73/20 73/20 74/16 74/17	confirmed [1] 98/12	contention [1] 42/21
compliant [1] 83/14	conflict [3] 14/21 44/21 73/7	continue [6] 7/9 43/11 49/4 58/9 98/20 122/22
complicated [3] 80/16 86/14 108/7	conflicts [1] 15/21	continues [1] 46/8
comply [2] 78/7 123/15	consent [4] 21/17 65/7 65/10 87/1	continuing [1] 11/21
complying [1] 46/14	consider [1] 11/14	contract [2] 51/16 64/17
comprehend [1] 29/14	considered [3] 25/19 27/7 85/3	contracts [1] 66/14
conceal [1] 88/11	consisted [1] 83/22	control [8] 8/17 9/19 10/18 10/21 12/13 35/2 94/24 96/8
conceals [1] 9/19	consistent [1] 121/9	controller [1] 91/13
concerns [1] 43/25	conspiracy [1] 6/8	controls [3] 10/2 10/5 10/24
concluded [1] 97/16	conspire [1] 9/20	convert [2] 12/18 35/7
conclusion [3] 99/7 99/23 116/15	constantly [1] 115/25	Converts [1] 10/4
concurrent [1] 47/6	constitute [1] 9/25	convicted [1] 19/7
condition [7] 13/10 29/14 29/17 41/21 43/8 46/8 52/3	constitutes [1] 125/12	copy [2] 89/5 104/14
conditions [1]	contact [12] 32/10 32/15 32/17 42/8 42/9 45/15 48/8 61/4 70/17 72/14 81/10 91/13	corner [1] 26/1
		corporation [1]

<p>C</p> <p>corporation... [1] 7/14</p> <p>correct [20] 16/17 25/22 27/11 31/11 39/10 40/21 55/11 60/16 60/17 62/9 62/10 63/15 64/4 66/6 68/9 72/12 76/21 80/22 86/10 88/19</p> <p>correctly [1] 75/15</p> <p>corresponding [1] 6/5</p> <p>cost [11] 31/10 52/12 52/14 52/20 59/9 60/19 61/2 62/9 62/18 68/14 87/23</p> <p>costs [4] 53/5 59/13 68/21 73/7</p> <p>could [31] 17/2 25/20 36/17 42/8 42/17 42/19 43/16 43/25 46/2 46/12 47/9 48/22 52/6 56/5 56/24 59/10 59/16 65/8 73/24 77/19 77/22 81/8 82/10 89/9 92/5 93/25 112/13 113/4 116/2 116/3 116/20</p> <p>count [1] 70/9</p> <p>country [2] 33/7 51/25</p> <p>counts [1] 80/17</p> <p>county [31] 1/2 5/10 16/10 16/13 16/15 20/22 25/25</p>	<p>29/25 30/3 30/7 30/10 32/3 34/10 40/6 40/9 54/14 58/4 67/8 71/11 71/13 71/19 71/22 71/23 71/24 78/9 78/11 84/6 121/10 123/17 123/19 125/4</p> <p>couple [6] 49/12 58/18 59/18 101/19 101/20 124/3</p> <p>course [3] 11/21 31/20 58/8</p> <p>court [105]</p> <p>court's [1] 47/17</p> <p>courthouse [1] 112/9</p> <p>courts [2] 28/14 73/19</p> <p>cousins [1] 27/12</p> <p>covers [1] 85/6</p> <p>crazy [1] 46/7</p> <p>create [1] 60/15</p> <p>created [2] 34/23 45/14</p> <p>credential [1] 85/1</p> <p>credentials [2] 91/20 92/19</p> <p>creditor [1] 72/19</p> <p>cremated [1] 113/8</p> <p>crime [2] 6/18 8/4</p> <p>crimes [5] 5/20 5/21 6/6 6/8 7/22</p> <p>criminal [16] 7/6 7/7 8/7 8/23 9/1</p>	<p>9/1 9/3 9/5 9/6 9/7 80/3 80/7 80/12 81/12 88/9 88/11</p> <p>criminally [1] 12/20</p> <p>criteria [2] 26/12 71/5</p> <p>curious [1] 119/5</p> <p>current [2] 34/14 49/1</p> <p>currently [23] 6/3 16/10 17/17 19/4 20/8 23/22 24/14 26/14 26/14 30/22 39/23 40/11 48/19 51/19 58/24 66/16 66/25 67/3 67/5 67/13 70/9 80/1 121/19</p> <p>cut [1] 122/10</p> <p>Cynthia [1] 40/11</p> <p>D</p> <p>daily [3] 13/14 97/10 105/17</p> <p>damage [1] 13/11</p> <p>Dan [1] 5/11</p> <p>Danette [7] 1/25 5/4 125/6 125/17 125/18 126/18 126/21</p> <p>danger [2] 43/16 67/20</p> <p>Daniel [1] 2/21</p> <p>date [5] 29/5 69/6 69/13 117/13 126/19</p> <p>dated [3] 103/23 103/24 125/14</p> <p>DAVID [1] 2/6</p>
--	---	---

D	decide [1] 48/18	degree [2] 20/23
day [19] 5/21	decides [4] 62/1	21/2
42/2 59/20 59/20	62/7 62/15 123/4	degrees [5] 26/18
69/10 76/17 91/14	decision [5] 75/5	26/23 27/8 27/16
91/14 94/4 106/3	75/7 81/4 91/14	27/20
111/2 113/12	123/5	deliberate [1]
113/15 113/18	decisions [18]	5/24
114/4 114/5	17/1 17/2 17/3	delineating [1]
115/18 115/21	17/4 17/10 21/13	34/2
124/5	21/16 22/4 22/6	deliver [1] 61/14
day-to-day [2]	36/22 36/23 43/2	dementia [6]
59/20 91/14	49/20 59/8 65/4	18/21 91/25 92/8
days [15] 23/14	65/7 65/17 67/16	92/9 92/12 92/20
25/4 44/9 49/25	declaration [3]	Denton [1] 102/1
69/12 78/8 78/11	14/5 14/6 14/11	Dentons [2] 102/5
99/5 106/6 107/1	declare [2] 75/2	102/19
107/2 107/6	75/6	department [5]
107/18 123/16	decline [1] 49/1	73/14 74/9 76/15
123/19	decrease [1]	82/15 86/23
DC [1] 1/7	50/23	depends [6] 47/7
deadline [1]	deemed [5] 11/18	47/12 67/10 67/17
76/11	16/25 17/24 19/6	67/19 69/6
deadlines [1]	65/4	depiction [1]
69/15	deeper [1] 92/21	90/4
deadly [1] 6/18	Defendants [1]	deposit [8] 60/12
deal [3] 17/20	1/9	60/21 60/23 60/25
33/13 46/3	deficit [2] 18/19	111/4 111/14
death [5] 38/7	75/10	111/17 112/2
44/9 97/6 108/16	deficits [1] 77/6	deposited [1]
113/9	defined [2] 7/12	111/8
debit [1] 104/25	7/20	depositing [1]
debt [2] 6/14	defines [2] 6/6	60/21
53/9	12/8	deposits [1]
December [7] 1/14	definitely [4]	111/21
2/1 5/1 114/1	43/17 50/7 52/18	deprivation [1]
122/3 124/7	62/13	11/11
125/15	definition [4]	deprive [4] 10/3
December 18 [1]	7/6 9/24 12/7	10/12 12/16 12/20
114/1	59/5	deprives [1] 13/1
deception [1]	definitions [3]	deputies [1] 5/13
12/13	5/20 5/23 6/4	Deputy [2] 2/20

D	70/11 114/22	95/23 106/22
Deputy... [1]	121/1 121/2 121/3	discovered [1]
2/21	died [9] 96/20	94/18
derived [3] 8/8	99/25 101/9	discreet [2]
8/11 9/15	101/11 107/19	88/17 95/13
described [4]	107/25 108/2	discuss [1] 43/24
14/12 92/5 103/9	108/12 108/21	discussed [1]
116/23	Diego [1] 49/8	74/12
designated [1]	dies [4] 44/4	distinction [1]
45/2	70/23 119/25	84/10
despite [1] 83/12	120/3	distinguishing [1]
detail [3] 85/8	difference [5]	7/25
117/6 117/7	19/9 29/20 45/5	DISTRICT [5] 1/1
details [2] 87/4	66/15 67/25	2/20 5/10 25/25
104/2	different [17]	40/8
Detention [4]	24/15 38/9 42/18	divide [1] 31/8
78/9 78/12 123/17	47/8 56/23 57/19	DMV [1] 90/2
123/20	58/5 58/18 60/2	do [144]
determination [2]	60/3 61/4 77/22	docket [3] 70/5
11/14 11/16	85/18 88/13 88/18	70/9 70/12
determine [3]	89/2 121/23	doctor [10] 28/10
11/12 23/24 100/3	dinner [1] 57/14	28/15 29/9 29/18
determined [4]	diploma [1] 21/7	33/12 37/7 37/11
10/9 111/9 111/11	direct [3] 8/23	47/25 77/14 87/19
114/7	60/23 60/25	doctor's [2]
determining [2]	directed [1]	28/21 75/2
11/23 54/10	112/8	doctors [5] 28/24
detrimental [1]	direction [3] 9/2	37/5 47/10 48/13
29/16	102/18 125/11	66/2
developmental [1]	directly [5] 8/8	document [4]
13/11	8/9 8/16 8/19	15/22 75/22 94/9
diagnoses [1]	9/14	103/15
18/22	disability [6]	documentation [4]
diagnosis [1]	13/11 17/11 17/12	18/1 26/8 53/14
49/2	18/2 18/16 28/16	75/8
DIANA [3] 2/15	discharge [2]	documents [35]
120/22 122/14	65/8 65/10	26/21 45/10 45/13
Dianne [2] 40/11	disclosing [2]	45/16 45/17 47/19
70/8	78/2 123/10	48/2 48/3 48/7
did [62]	discover [5]	83/15 86/20 87/5
didn't [6] 50/9	62/22 83/18 85/8	87/7 87/9 87/11

D	70/16 77/8 94/13 101/24 108/20 113/17 115/14 115/16 116/2 116/3 117/1	60/6 60/18 62/22 DVDs [1] 92/6
documents... [20] 87/13 87/21 87/25 88/4 88/10 88/17 92/18 93/13 95/6 95/20 95/21 98/15 101/22 103/4 103/8 103/9 104/13 112/10 112/13 123/7	DONOVAN [1] 2/9 door [1] 43/23 Dorothy [6] 95/18 96/7 96/20 98/4 116/23 117/24 Dorothy's [1] 97/18	E
does [52] doesn't [6] 17/17 27/13 42/12 47/4 57/24 119/25	down [11] 27/9 45/9 45/24 60/12 60/14 60/20 109/1 114/10 116/11 122/3 125/7	e-file [1] 112/13 e-filing [1] 112/12
dog [2] 61/12 61/13	drive [6] 55/14 55/20 55/22 56/1 112/9 112/18	each [20] 25/1 25/5 35/24 35/25 36/5 39/21 55/22 63/12 63/23 64/1 110/24 111/18 112/20 113/14 114/2 114/21 114/23 114/23 115/1 117/12
doing [16] 24/21 27/24 27/25 28/1 31/15 41/24 48/23 57/18 73/8 77/7 84/14 86/4 100/4 110/7 115/25 122/25	driving [2] 55/9 55/13	earlier [3] 103/10 114/6 118/7
dollar [5] 52/2 53/23 56/3 102/21 104/18	Drizin [1] 86/3 drop [4] 113/14 114/2 114/4 114/5	earn [1] 100/4 easier [1] 110/9
dollars [3] 62/11 74/10 99/23	drug [1] 6/19 drugs [1] 37/10	eat [1] 105/20
don't [22] 19/25 24/11 24/20 25/17 30/5 31/21 37/6 38/5 42/25 43/17 44/22 48/4 48/4 48/5 53/4 56/6 66/21 68/1 68/2 75/5 103/17 122/11	due [6] 48/25 49/13 53/10 69/5 69/9 69/11	eBay [1] 51/21 economic [1] 11/9 educational [2] 21/1 21/4
done [21] 25/2 28/4 28/9 30/4 33/16 34/5 44/20 50/5 59/10 63/17	duly [3] 5/5 16/2 79/16 duration [2] 10/9 114/19 during [3] 82/13 107/2 108/20 duties [3] 32/1 80/7 93/8 duty [10] 9/9 22/18 22/22 22/25 27/19 57/21 60/5	effect [1] 76/10 effective [1] 65/8 effectively [1] 44/5 effects [1] 52/15 eight [1] 39/24 EIGHTH [1] 1/1 either [12] 17/3 28/11 39/8 41/22 44/17 45/3 58/3 59/7 66/5 66/15 70/15 72/15 elder [4] 68/24 73/18 74/3 122/19

E		
elderly [5]	18/11	engage [1] 8/24
18/18 74/2 105/10		engages [1] 7/10
117/2		engaging [2] 7/11
elected [1] 71/12		7/21
eligibilities [1]		enlighten [1]
85/15		113/4
else [13] 32/8		ensure [4] 21/20
35/12 35/17 41/20		56/10 115/13
42/13 42/19 46/22		115/25
54/7 63/4 75/22		enter [1] 7/9
77/24 85/25		enterprise [9]
106/22		7/12 7/13 8/14
embezzlement [1]		8/17 8/18 8/20
6/24		8/22 88/9 88/11
emergency [1]		enterprises [1]
122/6		7/18
employed [6] 8/17		entire [2] 63/17
16/15 80/2 85/18		114/18
86/12 120/17		entities [2] 7/19
employee [8] 9/9		44/23
71/11 71/23 93/1		entitled [2]
94/5 112/21		59/21 125/8
114/20 120/16		entity [2] 7/15
employees [2]		7/17
76/25 88/6		entrusted [1]
employer [1]		10/7
120/13		entry [1] 103/23
employment [1]		environment [1]
85/17		67/16
empowered [1]		episode [1] 17/9
119/8		equals [1] 25/11
enabled [1] 95/7		equity [4] 8/13
encumber [1] 58/1		52/11 53/4 53/14
encumbrances [1]		errands [2] 93/5
23/17		112/7
end [3] 47/21		establish [1]
82/7 122/2		75/16
ends [1] 120/3		established [1]
enforced [1]		35/1
69/16		establishment [1]
		8/14
		estate [59]
		estate's [1]
		24/18
		estates [2] 17/17
		30/6
		ethical [2] 72/24
		76/22
		ethically [2]
		43/9 73/3
		ethics [1] 84/19
		eval [1] 43/10
		evaluation [1]
		43/4
		even [18] 7/9
		19/16 21/7 29/14
		34/11 36/24 43/10
		43/13 45/15 57/18
		58/10 61/23 75/10
		75/21 76/16 77/19
		118/14 119/17
		event [3] 45/24
		78/5 123/13
		events [1] 87/24
		eventually [3]
		5/24 53/19 70/23
		ever [5] 41/13
		45/11 52/16 68/23
		102/15
		every [7] 5/21
		25/21 40/1 42/2
		63/25 64/1 69/13
		everybody [7]
		55/16 63/4 89/4
		121/11 121/12
		121/16 121/17
		everything [3]
		47/12 61/4 73/9
		evidence [15]
		5/19 7/3 11/14
		11/15 26/3 78/4
		83/22 84/16 85/12

E evidence... [6] 91/11 92/16 105/17 123/12 124/1 124/4 exactly [4] 16/23 22/25 35/16 35/18 EXAMINATION [2] 16/6 79/20 examine [1] 115/22 examined [2] 3/2 87/20 example [10] 23/24 46/16 52/6 60/8 63/7 68/16 69/7 112/22 114/19 115/2 exceed [1] 25/18 exceeds [1] 69/3 except [1] 6/9 excess [1] 110/4 excessively [1] 112/17 excuse [3] 29/10 100/14 108/21 excused [2] 78/16 123/24 executed [2] 45/8 86/23 executor [3] 72/9 72/10 72/13 Exhibit [10] 6/1 88/22 88/23 88/25 89/25 90/13 90/25 94/10 104/4 116/9 Exhibit 4 [2] 94/10 104/4 EXHIBITS [2] 4/1 4/3 exist [1] 65/11	existing [3] 34/5 35/7 119/21 expended [1] 55/2 expenses [2] 25/13 57/21 experience [8] 41/15 56/21 65/1 83/13 83/17 83/18 85/9 119/10 experienced [4] 83/24 84/2 84/17 85/7 experiencing [1] 46/6 experimental [1] 37/10 expert [1] 24/6 explain [3] 33/3 60/6 117/8 explained [1] 60/13 explaining [2] 26/8 37/7 exploitation [9] 12/7 12/9 13/17 15/9 19/16 20/1 28/19 75/19 79/5 exploited [2] 32/7 67/13 explore [1] 26/23 extend [1] 27/12 extended [1] 106/2 extensive [4] 59/16 87/15 87/16 101/23 extinguishing [1] 119/5 extortion [1] 6/13 extortionate [1]	6/14 extra [1] 110/5 extraordinary [1] 118/17 eyes [1] 115/24 F face [10] 11/8 32/12 32/15 32/15 32/17 32/17 32/20 32/20 55/7 55/7 face-to [1] 55/7 face-to-face [2] 32/15 32/17 face-visitation [1] 55/7 facilities [3] 65/15 66/13 115/23 facility [16] 37/4 37/8 42/5 43/20 49/2 52/16 55/15 64/18 65/17 68/15 83/5 97/8 105/13 105/15 106/14 113/13 fact [4] 7/16 10/17 11/11 96/2 Failure [2] 78/7 123/15 fair [5] 11/5 76/16 90/3 90/16 91/3 faithfully [1] 5/5 false [15] 7/2 7/3 13/21 13/22 13/24 14/7 15/10 79/6 88/10 95/6 95/6 98/6 98/21 110/14 114/12
--	--	---

F		
familiar [1]	5/23	96/9 96/12 96/13
families [1]	19/9	96/18 97/2 99/17
family [35]	13/4	99/18 100/10
13/5 26/1 26/18		109/4 109/5
27/14 27/22 28/2		109/12 110/1
28/3 32/6 32/6		110/4 122/21
32/7 34/12 35/20		felonies [2]
36/12 36/16 48/7		20/2
48/8 48/12 48/13		20/3
49/3 49/4 51/3		felony [12]
51/8 51/11 62/2		6/10
65/12 65/15 65/16		6/15 6/17 6/21
65/20 65/23 66/4		9/22 12/4 12/6
71/4 71/6 74/18		13/19 13/20 14/3
113/1		14/14 19/7
far [5]	54/12	few [6]
70/4 90/22 117/10		38/9 61/8
118/17		67/18 76/3 116/9
Fargo [1]	111/11	120/7
faster [3]	64/20	fiduciary [7]
64/21 67/1		22/18 22/21 22/25
FBI [2]	71/23	23/3 23/6 57/20
72/4		60/5
FDIC [1]	38/4	figure [3]
federal [2]		25/6
126/12 126/15		27/19 117/18
fee [10]	30/8	figures [1]
30/11 58/17 100/7		67/6
111/5 118/14		figuring [1]
118/14 118/16		76/15
118/24 122/17		file [10]
feeding [1]	48/5	23/13
feel [5]	38/25	23/15 44/10 101/1
44/21 71/16 99/9		112/10 112/13
102/25		112/18 112/23
feels [1]	46/10	122/17 123/7
fees [24]	30/2	filed [10]
30/3 31/16 31/17		13/24
31/18 31/19 31/20		14/1 25/4 66/3
31/22 58/18 62/5		82/7 95/24 98/5
		110/17 122/9
		126/4
		files [1]
		87/3
		filing [17]
		13/21
		13/23 15/10 64/8
		79/6 83/14 88/10
		95/6 100/8 100/9
		100/10 102/16
		110/3 110/14
		112/12 112/15
		114/12
		filings [2]
		82/6
		118/15
		fill [1]
		66/22
		filling [1]
		60/20
		final [5]
		42/16
		44/10 100/11
		103/22 110/1
		finally [1]
		28/20
		finance [1]
		8/23
		finances [9]
		22/6
		23/8 31/13 31/14
		34/3 59/7 60/7
		94/24 120/6
		financial [10]
		18/6 28/19 36/23
		43/2 46/8 63/14
		83/14 87/15 93/13
		119/2
		financing [1]
		9/3
		find [12]
		23/16
		42/19 45/3 45/13
		48/23 51/10 65/22
		99/13 103/22
		104/11 118/22
		119/7
		fine [6]
		78/9
		78/11 103/17
		104/1 123/17
		123/19
		firm [4]
		86/3
		86/7 120/19
		121/19
		firms [5]
		85/19
		86/13 120/16
		121/23 121/23
		firms' [1]
		85/20
		first [17]
		5/5
		14/17 15/15 16/2

F first... [13] 33/18 34/4 47/25 61/8 75/24 79/11 79/16 82/5 89/10 95/17 110/13 114/11 117/18 fiscal [1] 30/21 five [15] 8/3 24/24 25/1 31/3 31/4 31/7 31/9 45/21 45/24 58/24 58/25 63/19 63/19 64/2 82/2 flat [5] 100/7 111/4 118/14 118/16 122/21 Flewellen [7] 107/12 107/16 107/18 107/22 108/6 108/16 108/16 Flewellen's [2] 107/18 108/23 folks [1] 89/21 follow [2] 76/3 77/25 follow-up [1] 77/25 follow-ups [1] 76/3 following [2] 5/6 6/8 follows [2] 16/4 79/18 food [2] 36/3 61/13 force [1] 119/6 foreclosure [1] 53/20 foregoing [1]	125/11 Foreperson [3] 2/3 16/2 79/16 Foresters [2] 102/17 105/2 forged [1] 13/24 forgery [1] 6/14 form [4] 28/13 81/3 81/9 88/5 formed [1] 86/9 former [1] 99/21 forth [1] 100/10 forward [1] 48/13 found [9] 74/7 83/20 83/22 83/23 103/7 103/8 103/20 103/25 104/7 Foundation [1] 92/4 four [3] 80/6 82/2 113/9 frame [1] 69/4 fraud [8] 80/10 80/21 80/24 80/25 81/13 94/10 114/12 115/5 fraudulent [4] 10/17 80/16 96/4 96/7 fraudulently [8] 88/12 94/19 95/3 99/1 108/11 116/20 116/25 117/24 free [7] 13/1 38/25 59/10 71/16 99/9 102/25 116/2 freed [1] 109/19 frequency [1] 32/12	friend [3] 32/8 45/21 47/4 friends [1] 49/5 front [3] 74/23 89/5 104/15 full [5] 55/22 61/13 108/23 110/1 125/12 fully [1] 98/13 function [1] 57/17 Fund [1] 30/7 funds [14] 30/5 30/5 31/19 31/21 44/11 46/17 52/23 57/15 58/3 58/10 61/16 71/9 94/16 119/2 furnish [1] 9/2 further [9] 6/2 8/25 9/4 9/6 9/12 9/17 53/18 70/12 122/13 future [4] 10/16 65/19 67/17 117/13 <hr/> G gain [2] 26/20 77/3 garden [1] 5/20 GARY [11] 1/8 5/15 15/12 79/8 90/9 90/24 91/6 93/5 94/5 112/8 113/7 gauge [1] 39/20 gave [2] 45/22 86/15 general [9] 2/21 19/20 23/1 23/12
---	---	--

G		
general... [5] 25/5 30/7 69/7 94/23 95/11	47/13 67/4 giving [4] 21/17 34/1 75/9 83/8	2/19 4/3 5/21 5/25 6/16 15/3 15/20 16/3 71/15 78/4 78/6 78/6 78/24 79/17 83/3 89/15 90/20 110/9 117/14 123/12 123/14 123/14 124/2 126/4
General's [3] 5/12 80/4 81/13	GJ [1] 1/7 go [33] 34/7 34/19 37/7 37/16 37/19 37/21 44/20 46/2 46/18 48/7 48/15 49/24 50/23 53/13 53/19 56/18 57/13 57/14 57/17 61/12 61/17 61/22 66/22 70/24 73/18 77/2 88/2 89/8 95/16 97/5 103/24 104/8 117/6	grandchildren [2] 27/6 27/10 grandparents [2] 27/4 27/9 grant [1] 126/16 granted [6] 21/11 21/12 98/23 101/4 106/15 106/16 great [1] 83/9 greater [2] 11/8 117/7
generally [10] 28/24 31/22 33/3 33/24 40/6 43/21 51/15 57/2 61/22 65/14	God [2] 15/4 78/25 goes [7] 25/17 30/6 35/23 46/6 109/7 109/8 109/8 going [55] gone [3] 50/13 101/21 124/3 good [4] 5/9 52/25 79/23 96/9 goods [1] 6/23 Gosh [1] 38/9 got [10] 39/5 48/14 81/17 89/5 94/24 94/24 110/10 121/2 121/4 123/1 GOTHARD [1] 2/4 government [4] 29/23 68/5 73/14 111/1 governmental [2] 7/18 58/3 grade [1] 11/23 grand [25] 2/1	grandchildren [2] 27/6 27/10 grandparents [2] 27/4 27/9 grant [1] 126/16 granted [6] 21/11 21/12 98/23 101/4 106/15 106/16 great [1] 83/9 greater [2] 11/8 117/7 green [1] 28/8 gross [3] 13/18 78/8 123/16 group [19] 7/16 43/20 43/21 48/20 55/17 55/24 55/25 58/6 58/7 63/9 66/10 67/15 83/5 84/22 88/17 99/20 112/23 114/20 116/2 groups [1] 88/18 guardian [175] guardian's [29] 16/16 17/16 20/20 20/22 21/3 29/22 30/3 32/14 34/7 34/10 39/23 43/24 44/21 51/5 57/25 58/19 59/12 64/21 66/17 66/19 67/4
generate [1] 30/3 generated [1] 30/2 gentleman [5] 89/22 90/6 108/2 108/12 109/3 gentlemen [2] 58/11 123/25 genuine [1] 14/1 GERALDINE [1] 2/16 get [59] gets [1] 18/19 getting [6] 21/16 33/15 46/3 52/2 67/3 121/14 gift [6] 113/23 113/25 114/2 114/4 114/5 114/9 give [16] 15/2 15/8 21/10 39/21 46/21 47/19 61/21 65/7 72/15 77/5 78/23 79/4 85/7 89/3 104/2 119/13 given [7] 24/17 40/19 40/25 46/16 93/7 108/18 120/7 gives [6] 11/24 33/8 38/14 46/24		

G guardian's... [8] 67/8 68/3 69/18 77/2 77/16 82/11 95/21 122/6 guardians [24] 33/6 34/13 34/13 35/20 35/21 36/13 41/6 50/25 51/18 54/13 59/1 59/2 64/16 68/7 68/11 74/9 74/13 76/6 76/13 76/19 84/12 100/14 108/18 120/7 guardianship [165] guardianships [7] 17/14 22/8 22/11 42/20 70/14 84/18 114/14 guess [3] 28/11 76/17 106/4 guidelines [2] 33/5 33/6 guilty [3] 9/22 14/3 14/12	18/13 handle [6] 18/4 18/6 43/1 43/6 65/23 72/10 handles [1] 59/7 handling [1] 21/18 hands [1] 42/20 handwrite [1] 101/22 handwriting [1] 105/18 handwritten [2] 94/7 103/9 handyman [1] 99/20 hanging [1] 24/1 happen [3] 45/23 48/11 70/25 happened [5] 35/17 56/12 95/22 101/12 108/6 happening [2] 56/17 119/17 happens [9] 35/5 42/12 42/24 44/3 45/24 55/18 57/24 62/1 76/18 hard [2] 23/23 74/7 has [53] hasn't [2] 19/5 45/19 have [214] having [18] 5/5 10/25 16/2 19/11 21/2 21/9 21/25 22/14 33/1 45/5 45/6 47/16 61/4 64/16 66/10 79/16 110/6 120/6	he [35] 5/11 40/19 40/22 46/5 71/13 91/8 91/17 91/20 91/20 91/23 91/24 92/1 92/12 92/14 92/15 92/19 92/25 93/2 93/3 93/6 93/7 107/25 111/15 111/16 112/15 112/16 112/17 113/8 113/10 113/12 113/15 113/15 113/17 118/10 121/4 he's [5] 40/20 40/25 46/6 92/12 92/25 health [2] 97/11 115/22 hear [4] 5/17 29/6 75/14 93/10 heard [1] 59/1 hearing [10] 28/6 29/10 29/13 29/15 40/18 40/19 69/14 77/18 119/16 122/12 hearings [1] 26/22 heirlooms [1] 51/7 held [9] 34/10 78/10 80/5 85/1 87/1 91/8 105/1 105/15 123/18 Hello [1] 79/24 help [5] 15/4 62/2 65/19 74/4 78/25 helping [1] 70/20
--	---	--

H	112/19 112/22	honor [1] 48/6
helps [2] 49/2	113/11	hopefully [1]
89/8	hire [4] 24/4	54/9
Henderson [2]	56/18 57/17 66/22	Hoskins [2] 41/2
86/24 111/12	hired [3] 40/22	41/3
her [78]	71/23 106/25	hospice [2] 66/12
here [20] 15/7	hiring [1] 27/24	97/9
25/25 26/12 30/18	his [24] 9/9 10/8	hospital [15]
49/16 54/14 66/1	10/24 12/18 12/22	29/17 52/22 64/18
79/3 84/5 89/7	13/1 46/3 46/3	64/20 64/23 65/5
89/10 89/12 92/24	46/7 46/8 47/4	65/5 65/9 65/12
92/25 107/11	91/16 92/15 92/19	65/18 65/22 66/7
107/13 109/10	93/8 93/11 93/11	68/15 68/18 68/22
109/16 121/8	99/19 106/21	hospital's [1]
121/10	107/23 107/24	64/25
hereby [2] 125/7	109/1 109/2	hospitals [2]
126/4	111/22	33/25 47/15
heroic [1] 48/4	historical [1]	hour [44]
herself [15]	83/23	hour's [1] 114/25
58/23 83/25 96/9	historically [2]	hourly [6] 30/15
96/18 97/2 99/16	66/16 66/25	54/12 57/3 58/17
102/22 102/24	history [1] 77/3	58/18 111/22
103/2 108/13	hold [1] 57/7	hours [17] 63/20
108/22 109/13	home [37] 23/15	63/25 64/2 94/6
110/4 120/17	23/16 24/6 25/8	105/19 107/2
123/8	43/20 48/21 52/10	107/6 110/24
hey [2] 41/23	52/11 52/13 52/22	111/2 112/2
65/25	52/23 53/2 53/5	112/19 112/22
high [3] 21/7	53/8 55/17 55/20	113/1 113/11
38/3 69/23	55/24 55/25 56/16	113/14 115/2
higher [3] 52/7	56/17 58/6 58/7	115/23
54/5 67/14	61/10 61/16 61/19	house [14] 24/1
highest [1] 11/18	63/9 63/24 67/15	44/13 50/2 50/3
highly [5] 83/24	85/16 86/25 97/11	50/14 51/10 51/20
83/24 84/1 84/1	97/12 99/19 99/20	52/12 52/15 53/10
84/3	103/25 114/20	53/11 53/11 61/14
Hills [1] 100/25	116/2	61/23
him [12] 10/7	homeowners [1]	how [56]
41/1 45/23 45/23	83/5	however [9] 29/8
46/2 98/9 99/19	homes [2] 66/10	30/4 32/17 36/3
99/20 112/1	85/14	44/6 55/16 99/14

H	identify [1] 90/7	99/19 100/8
however... [2] 120/4 121/21	illicit [1] 7/17	100/10 108/20
huge [1] 70/1	illness [1] 13/12	118/15
huh [3] 20/4 55/8 107/14	illustration [1] 29/3	includes [4] 7/13 7/17 13/15 26/8
human [1] 21/10	immediate [2] 28/19 28/20	including [7] 11/14 51/17 78/3
hundred [2] 18/3 62/11	impairment [3] 17/24 18/24 26/9	93/13 96/1 98/7 123/11
hundreds [1] 84/5	imperative [1] 5/22	income [12] 21/19 22/22 23/2 23/3
Huntington's [1] 18/22	implies [1] 85/25	23/10 24/10 25/11
I	important [3] 51/8 56/8 119/13	35/23 50/4 61/1 111/8 112/3
I'd [1] 122/10	impose [1] 22/8	incompetent [7] 16/25 19/6 19/21
I'll [1] 103/19	improper [1] 12/25	45/19 75/3 75/6 75/12
I'm [42] 16/10 19/8 19/8 25/21 26/24 27/18 29/4 31/20 32/24 37/21 37/22 41/15 47/11 54/16 54/20 57/17 59/14 64/16 67/25 69/9 72/21 73/2 80/3 80/20 88/21 89/14 89/15 90/13 90/19 94/1 94/25 100/23 104/12 105/25 107/10 109/10 109/14 110/8 113/20 119/5 119/8 122/2	improved [1] 43/8	increased [1] 111/22
	inapplicable [1] 11/3	increments [1] 54/19
	inappropriately [1] 36/16	independent [1] 45/1
	incapable [2] 16/25 17/10	independently [2] 28/18 50/13
	incapacitated [1] 59/6	INDEX [2] 3/1 4/1
	incapacitates [1] 45/23	indicate [2] 22/17 33/20
	incapacitation [1] 13/10	indicated [2] 117/20 125/9
	incapacity [5] 28/14 28/25 29/11 75/8 75/11	indicates [1] 29/12
I've [6] 62/13 66/9 66/11 80/15 92/17 94/23	inception [1] 62/17	indication [2] 48/14 77/5
i.e [1] 119/7	incidents [3] 8/1 8/1 8/2	INDICTMENT [2] 4/4 14/23
idea [2] 18/7 82/8	incite [1] 8/24	indirectly [5] 8/8 8/10 8/16 8/19 9/14
ideas [1] 33/9	include [3] 6/1 13/3 84/6	individual [3]
identified [2] 4/3 89/2	included [5]	

I	11/11 13/21 13/22	interviews [6]
individual... [3]	13/24 13/25 15/10	83/5 83/7 91/11
7/9 60/7 110/11	79/6	98/18 107/4
individually [1]	instrumental [1]	116/17
63/23	10/18	intimidation [2]
induce [1] 8/24	insurance [11]	8/25 12/13
inducing [1] 9/7	36/18 87/18	inventoried [1]
industry [1]	101/16 101/17	23/18
121/10	102/2 102/6 102/8	inventory [6]
influence [3]	102/12 102/16	23/13 23/22 49/25
12/14 12/25 13/3	102/21 105/1	50/1 50/13 50/16
inform [3] 49/10	insured [1] 38/4	invest [2] 8/9
63/2 77/7	intangible [1]	38/2
information [16]	10/11	investigate [7]
26/16 38/10 59/25	intellectual [2]	41/6 80/9 80/21
61/22 63/1 69/22	17/11 18/16	81/5 81/14 81/20
69/25 72/16 75/9	intend [1] 26/25	82/21
77/4 77/23 78/6	intends [1] 9/12	investigated [1]
92/16 93/22	intent [7] 6/17	75/19
106/18 123/14	8/7 9/4 9/17 10/3	investigating [1]
informed [1]	10/12 12/20	73/15
65/16	intention [1]	investigation [34]
initial [5] 28/6	12/15	15/2 15/8 71/20
38/18 82/1 83/11	Intentionally [2]	72/5 78/23 79/4
118/15	8/22 9/5	81/10 82/12 82/14
initiate [2]	intents [1] 7/23	83/1 83/21 85/11
38/22 47/23	interest [10]	87/14 88/7 89/2
initiated [1]	8/12 8/13 8/16	93/12 94/18 98/12
66/7	10/5 29/18 44/21	101/15 101/21
injury [2] 18/17	49/21 61/1 73/7	102/13 102/20
49/14	73/8	105/16 110/16
inquiry [1] 10/23	internally [1]	111/7 111/13
instances [2]	69/17	112/11 116/16
88/17 88/18	International [1]	117/9 118/22
instituted [1]	102/17	119/11 119/22
45/19	interrelated [1]	121/7 122/19
instructions [5]	7/24	investigations [1]
4/5 5/25 6/2 34/1	interrupted [1]	80/16
101/24	98/20	investigative [1]
instrument [10]	interview [2]	80/15
11/6 11/8 11/10	110/22 110/25	investigator [4]

<p>I</p> <p>investigator... [4] 80/3 80/8 80/12 81/13</p> <p>investment [2] 8/11 38/6</p> <p>investments [4] 21/22 23/20 38/3 59/23</p> <p>invoice [1] 103/22</p> <p>involved [7] 11/17 11/18 11/20 12/3 12/5 80/25 100/18</p> <p>involvement [2] 71/1 71/3</p> <p>involves [2] 13/17 55/9</p> <p>involving [3] 9/16 15/11 79/7</p> <p>is [358]</p> <p>isn't [3] 46/14 51/13 119/24</p> <p>isolated [1] 7/25</p> <p>issue [2] 14/8 122/20</p> <p>issued [1] 33/23</p> <p>it [195]</p> <p>it's [52]</p> <p>item [1] 50/12</p> <p>itemized [1] 50/16</p> <p>items [9] 50/10 51/4 51/6 51/7 51/16 51/20 54/10 61/17 117/12</p> <p>its [3] 7/9 11/15 34/11</p> <p>itself [1] 104/25</p>	<p>J</p> <p>J-A-C-L-Y-N [1] 79/14</p> <p>JACLYN [4] 4/6 78/19 79/13 79/15</p> <p>January [3] 69/8 69/12 103/23</p> <p>January 1st [2] 69/8 69/12</p> <p>January 31 [1] 103/23</p> <p>Jay [2] 2/20 5/9</p> <p>jewelry [2] 50/14 51/22</p> <p>job [5] 16/20 30/1 40/22 70/22 80/17</p> <p>JOHN [3] 2/12 40/18 102/1</p> <p>joining [1] 79/25</p> <p>jointly [2] 5/12 82/21</p> <p>judge [14] 29/5 29/7 35/25 36/12 40/11 40/20 40/23 40/25 41/1 41/2 70/7 74/24 74/24 75/9</p> <p>judge's [3] 75/5 75/7 75/12</p> <p>judicial [2] 1/1 40/13</p> <p>July [4] 8/2 16/17 76/12 93/7</p> <p>July 1 [1] 8/2</p> <p>July 2014 [1] 93/7</p> <p>jump [1] 67/24</p> <p>June [2] 82/20 107/17</p> <p>June 2015 [1]</p>	<p>82/20</p> <p>June 6 [1] 107/17</p> <p>jurisdiction [1] 44/18</p> <p>jurors [2] 2/1 71/15</p> <p>jury [22] 2/19 4/3 5/21 5/25 15/3 15/20 16/3 78/4 78/6 78/6 78/24 79/17 83/3 89/15 90/21 110/9 117/14 123/12 123/14 123/14 124/2 126/4</p> <p>just [54]</p> <hr/> <p>K</p> <p>K-A-R-E-N [1] 15/18</p> <p>K-E-L-L-Y [1] 15/18</p> <p>Karen [3] 14/17 15/17 16/1</p> <p>KATHERINE [1] 2/10</p> <p>keep [4] 34/14 49/3 53/11 53/18</p> <p>keeping [3] 59/17 73/9 105/11</p> <p>Kelly [4] 14/18 15/17 16/1 16/9</p> <p>kidnapping [1] 6/11</p> <p>kind [52]</p> <p>kinds [2] 18/25 60/2</p> <p>knew [2] 85/4 85/4</p> <p>knit [1] 121/11</p> <p>know [57]</p>
--	---	---

K	76/7 78/1 82/11 83/14 85/19 85/20 86/2 86/6 86/13 106/19 120/7 120/16 120/19 122/20 123/9 126/12	97/20 99/7 99/13 105/21 109/2
knowing [3] 9/11 10/25 59/22		leftover [1] 71/9
knowingly [3] 8/24 10/2 13/23		legal [8] 7/15 7/17 72/24 83/15 86/7 100/4 118/17 123/7
knowledge [4] 9/18 69/17 72/6 112/25	lawful [1] 10/1	legislature [1] 20/12
known [2] 20/6 54/14	lawn [2] 97/12 99/22	lengthy [2] 14/20 15/22
knows [7] 9/13 84/17 84/18 84/19 104/17 104/18 119/15	LAWRENCE [1] 2/17 laws [4] 20/12 82/10 84/18 108/1	less [10] 11/8 12/1 12/3 13/17 13/18 24/11 24/17 24/18 54/20 111/20
L	lawsuit [3] 38/20 38/21 38/24	let [12] 26/22 37/19 43/21 51/6 51/8 53/16 71/6 73/11 81/23 83/16 88/15 103/18
Ladies [2] 58/11 123/25	LAYNE [1] 2/5	let's [11] 25/7 26/23 27/17 45/21 55/5 55/12 56/1 61/9 63/17 64/10 117/18
language [4] 38/13 38/18 50/25 119/18	leading [1] 26/16	letters [7] 22/16 33/23 33/23 41/12 51/5 71/7 72/15
larceny [1] 6/16	learned [24] 82/19 83/23 85/20 88/8 91/10 101/20 102/20 105/16 106/24 107/4 110/16 110/19 111/7 111/12 112/11 114/3 114/15 115/17 115/20 115/22 116/16 119/11 119/22 121/6	level [5] 21/14 28/17 32/10 52/7 55/3
large [1] 114/5	learning [1] 80/17	licensed [2] 76/14 84/13
Las [9] 1/13 5/1 48/20 82/14 82/17 82/23 85/19 86/23 125/14	least [7] 7/21 8/1 13/18 32/15 40/8 70/2 111/8	licensing [3] 76/8 76/13 76/18
last [18] 8/2 15/16 19/7 19/22 40/7 41/9 42/3 56/6 67/6 70/9 73/19 73/22 75/14 76/11 79/12 101/9 109/15 113/22	leave [4] 7/10 43/25 61/19 65/9	licensure [1] 20/13
lasted [2] 105/24 107/1	leaving [1] 37/18	licit [1] 7/18
later [7] 17/12 87/5 92/22 96/9 104/2 107/18 121/13	led [1] 92/3	life [11] 22/10 41/21 47/21 47/22
law [17] 14/2	Lee [1] 86/3 left [9] 17/9 90/7 90/12 97/5	

L life... [7] 47/23 48/16 60/1 101/16 101/17 102/2 102/5 light [1] 83/17 like [51] limit [3] 39/17 39/19 66/21 limitation [1] 122/24 limitations [1] 13/13 limited [4] 10/8 10/10 22/7 47/9 line [8] 73/3 73/20 89/10 112/9 112/18 117/19 117/21 117/21 link [1] 51/24 list [5] 30/18 37/24 38/25 50/10 67/3 listed [11] 14/22 50/12 63/3 95/17 107/8 107/12 109/21 110/12 112/4 113/3 113/16 listen [1] 57/7 lists [5] 28/15 62/25 63/1 72/12 92/15 little [15] 26/16 28/8 29/11 29/15 44/8 47/16 67/1 84/9 85/8 86/14 87/5 92/22 95/11 101/14 101/25 live [4] 28/17 30/2 52/17 63/9	lived [5] 100/20 101/19 113/12 114/20 115/23 lives [3] 43/20 48/20 55/23 living [9] 13/14 16/9 26/14 32/19 83/6 97/9 105/13 113/13 116/3 LLC [8] 85/23 86/18 89/11 93/4 93/19 99/3 106/9 109/6 loath [1] 75/16 local [3] 76/12 111/9 113/8 locate [2] 27/22 28/1 located [3] 26/1 92/15 105/18 location [1] 9/19 locked [1] 37/8 long [17] 16/12 38/15 39/25 52/25 54/9 56/6 70/6 73/3 77/6 80/5 99/2 101/9 101/9 101/15 101/18 105/23 106/3 longer [5] 53/17 66/20 70/17 119/8 122/7 look [18] 23/17 24/1 30/12 30/19 33/7 38/10 38/25 48/1 49/10 57/10 59/16 70/19 73/23 74/24 81/3 83/9 96/14 112/21 looked [7] 36/1 36/1 51/18 54/2	54/3 111/25 116/10 looking [15] 36/2 54/9 55/3 56/16 57/16 74/14 75/24 75/25 89/9 99/8 100/23 104/8 105/25 106/1 109/10 looks [1] 115/1 lose [1] 45/12 loss [1] 11/9 lost [1] 10/21 lot [20] 21/11 24/9 24/11 37/2 37/15 41/11 41/12 50/14 50/25 51/23 54/7 54/7 56/7 57/19 62/9 66/24 80/16 83/4 101/19 121/4 lower [2] 56/19 57/11 <hr/> M <hr/> made [12] 10/17 14/5 14/6 78/5 102/15 110/5 114/3 115/12 115/19 115/20 121/12 123/13 mail [1] 28/7 mailed [1] 26/21 mailing [1] 28/4 main [4] 19/10 36/6 61/24 93/8 mainly [1] 31/1 maintain [2] 8/16 60/6 maintained [1] 52/16
---	---	---

M	manners [1] 88/14	104/22 116/24
major [1] 18/25	manslaughter [2]	master [4] 40/18
majority [2] 96/9	6/9 6/9	40/20 69/14 77/18
114/6	many [13] 30/14	material [3]
make [27] 10/4	39/14 39/17 39/19	10/12 10/14 14/8
14/11 14/20 17/2	40/5 60/24 70/4	math [1] 70/13
22/4 22/6 22/23	77/7 81/24 88/1	matter [5] 14/7
26/17 34/8 35/12	92/17 103/18	15/25 82/21 108/4
35/13 36/17 41/6	105/19	125/8
46/3 49/20 49/21	March [1] 69/12	matters [3] 80/10
52/1 56/13 65/3	March 1st [1]	80/21 82/6
65/6 65/16 69/19	69/12	maximize [1]
73/21 81/4 110/9	MARK [25] 1/8	49/22
111/17 111/20	5/15 15/11 79/7	may [28] 10/19
makes [5] 14/7	90/11 91/6 91/7	10/20 11/13 11/22
14/9 31/23 75/12	91/9 91/10 91/15	14/13 18/12 22/9
86/13	91/24 92/10 92/18	24/9 34/16 42/5
making [10] 10/15	105/16 111/8	42/6 46/18 47/8
11/13 17/1 17/10	111/13 111/17	51/23 52/11 52/22
21/13 21/14 21/15	111/20 111/22	55/19 58/1 59/19
21/16 63/13 91/15	111/25 112/8	65/19 65/24 67/16
malfeasance [1]	112/12 114/1	68/14 68/20 78/10
88/19	114/15 116/6	96/14 103/13
man [1] 91/12	marked [3] 5/25	123/18
manage [4] 8/22	6/2 88/22	maybe [22] 18/19
22/22 23/2 47/11	market [2] 11/5	23/23 29/16 34/14
managed [3] 22/23	11/7	34/15 41/21 42/19
44/11 60/4	marketed [1]	44/15 45/25 46/2
management [5]	92/17	46/14 48/10 49/2
9/3 31/1 57/19	markets [1] 83/25	56/6 56/12 57/14
59/23 91/8	Marks [1] 116/19	61/19 62/11 63/11
manager [9] 16/22	MARRENA [1] 2/13	67/15 70/13
20/25 30/24 31/6	married [1]	121/13
55/19 66/22 85/15	101/19	mayhem [1] 6/10
91/8 116/19	MARTIN [1] 2/8	MD [3] 77/14
managers [3]	MARY [13] 2/4	77/16 77/21
29/23 39/24 58/19	100/13 100/19	me [18] 5/11
managing [2]	100/20 100/24	41/24 45/22 47/19
37/15 59/20	101/9 101/14	62/8 74/15 81/8
manifestation [1]	101/15 101/21	81/23 83/16 88/15
45/25	102/11 102/19	89/23 92/3 94/20

M	meeting [1] 49/13	minimal [1] 21/3
me... [5] 100/14	meets [2] 43/13	minimize [2]
103/18 104/8	71/4	57/21 60/19
108/1 108/21	MELVINA [1] 2/9	minimums [2] 57/1
mean [13] 6/7	member [7] 13/4	57/1
24/9 27/13 46/16	13/4 27/14 32/7	minors [4] 17/15
59/17 70/1 80/19	36/12 36/16 65/23	17/18 17/20 18/3
84/2 84/10 92/2	members [18] 7/9	minute [3] 31/2
112/6 114/22	26/18 28/2 28/3	54/19 83/17
119/9	32/6 32/6 48/8	minutes [16] 31/3
means [11] 7/1	48/8 51/11 65/12	31/4 31/7 31/9
7/7 7/21 10/14	65/15 65/16 65/20	54/8 54/24 54/25
10/22 11/4 12/9	89/15 90/20 110/9	58/13 63/11
12/25 13/6 13/8	117/14 124/2	110/20 111/12
114/16	memory [4] 54/16	111/18 111/20
meant [1] 114/13	77/6 96/15 99/9	112/14 112/19
measures [3] 48/4	mental [6] 13/10	124/3
96/4 98/9	13/12 13/13 18/13	misconduct [1]
mechanical [1]	76/23 77/8	81/21
48/5	mentioned [14]	misdelivered [1]
mechanism [1]	21/1 21/25 35/19	10/21
42/10	55/6 58/18 58/22	misdemeanor [4]
Medicaid [7]	58/25 69/2 80/21	12/2 13/18 78/8
31/22 58/4 68/16	85/7 86/19 100/1	123/16
68/18 68/20 68/21	118/7 120/14	mislaid [1] 10/21
85/15	met [1] 69/20	misrepresentation
medical [30] 17/8	methods [1] 7/24	[2] 10/12 10/14
17/9 18/1 21/15	Metro [3] 82/18	misrepresentations
21/15 21/17 22/4	82/23 82/25	[3] 95/7 96/1
25/12 26/8 28/20	Metropolitan [2]	96/5
29/17 33/15 33/24	82/15 86/23	misrepresented [1]
36/22 37/9 43/1	MICHAEL [1] 2/14	106/18
59/7 60/3 61/11	middle [1] 89/16	Miss [50]
63/14 65/4 67/16	might [14] 14/1	Miss Braslow [1]
77/9 77/10 77/13	14/21 15/21 18/8	106/12
87/16 87/17	18/14 24/2 37/11	Miss Braslow's [1]
105/12 105/15	58/13 58/23 64/11	106/19
106/14	67/2 70/24 75/10	Miss Kelly [1]
medically [3]	89/7	16/9
61/19 67/13 91/23	mind [2] 59/11	Miss O'Malley [2]
meet [1] 26/11	117/10	79/23 117/15

M	month [25] 25/10	91/13 111/10
Miss Parks [22]	25/16 25/18 32/16	112/15 120/5
87/8 87/12 88/5	32/18 32/21 33/1	123/8
90/1 90/4 90/7	35/15 35/24 36/1	mostly [1] 115/14
94/12 95/7 96/12	36/5 40/1 40/2	move [16] 37/4
97/1 98/10 98/25	55/7 56/2 56/4	48/13 48/18 48/20
99/2 100/1 100/17	67/6 87/19 93/8	48/24 49/6 49/7
101/1 104/6 105/6	94/4 106/4 110/2	49/8 49/15 52/7
106/12 106/20	111/8 114/7	64/22 64/24 67/1
108/22 122/9	115/13	94/25 107/11
Miss Parks' [7]	monthly [2] 34/20	109/14
83/18 85/9 86/20	60/9	moved [1] 70/16
97/24 98/16	months [10] 61/8	moving [2] 94/16
100/14 103/5	67/18 69/9 69/10	114/10
Miss Trumbich [5]	81/25 96/20 96/24	Mr [8] 98/7 98/13
95/20 95/22 96/1	96/25 97/20 120/7	98/23 98/24 99/3
96/4 96/6	more [34] 6/23	99/6 99/18 99/24
Miss Trumbich's	6/25 7/1 11/22	Mr. [15] 90/14
[2] 95/24 97/5	12/3 12/6 13/12	90/17 91/1 91/4
Miss Weber [1]	13/19 20/9 20/11	92/24 93/15 99/4
105/24	25/2 35/15 39/15	107/18 107/18
Miss Weber's [1]	41/10 41/11 41/12	107/22 108/6
105/21	42/3 47/13 47/16	108/16 108/16
Miss Woods [6]	53/9 62/9 62/12	108/23 112/14
100/18 101/2	66/24 76/20 86/16	Mr. Burns' [1]
101/11 103/12	88/3 92/9 94/17	99/4
103/16 103/22	97/7 105/14 108/6	Mr. Flewellen [5]
Miss Woods' [1]	117/12 117/22	107/18 107/22
103/6	118/18	108/6 108/16
missed [1] 39/1	MORTALONI [1] 2/3	108/16
MISSOURI [1] 2/9	mortgage [2]	Mr. Flewellen's
MISSOURI-DONOVAN	23/17 53/16	[2] 107/18
[1] 2/9	mortgages [1]	108/23
mom [5] 26/5	53/5	Mr. Simmons [2]
26/24 27/17 29/3	mortuary [2]	90/14 90/17
29/4	113/4 113/8	Mr. Taylor [4]
moment [1] 120/1	mortuary/toilet	91/1 91/4 92/24
money [59]	[1] 113/4	112/14
monies [2] 38/2	most [12] 25/17	Mr. Taylor's [1]
53/18	44/12 52/19 53/3	93/15
monitor [1] 41/6	56/5 61/2 87/17	Mrs. [1] 97/12

M	national [4] 32/25 33/4 84/22 84/23	104/14 121/8 125/3 125/14
Mrs. Trumbich [1] 97/12	nationally [4] 84/8 84/13 91/10 91/21	never [2] 77/21 103/21
much [18] 23/16 24/6 25/9 25/12 35/25 36/1 36/3 39/21 48/19 55/3 56/19 59/20 61/7 61/7 63/23 64/3 93/23 99/7	natural [1] 7/13 nature [1] 102/14 nearly [2] 61/7 63/4	new [4] 34/16 42/23 60/15 66/22
multiple [15] 5/17 55/17 55/18 63/8 94/10 111/21 112/16 112/17 113/10 114/11 114/16 114/17 114/24 116/21 121/22	necessarily [1] 72/4 necessary [1] 29/3 necessity [1] 36/9	next [19] 69/10 78/18 87/6 97/23 100/12 104/4 105/2 105/4 106/7 107/11 107/12 109/14 111/4 112/4 113/3 114/11 115/4 116/11 124/4
MUNIZ [1] 2/10	need [57]	nieces [1] 27/12
Murder [1] 6/9	needed [6] 34/18 52/19 55/4 74/22 100/20 101/24	nine [3] 113/12 114/19 115/2
must [3] 25/4 32/15 68/3	needs [13] 23/21 28/21 32/4 33/16 36/3 45/7 49/11 50/12 50/15 52/7 57/13 61/11 66/4	NJ [1] 39/8 no [64]
my [48]	Neely [4] 109/16 109/17 109/18 110/6	nobody [4] 35/12 35/17 36/8 41/20
myself [4] 30/23 57/18 71/20 86/22	Neely's [1] 109/24	nominated [1] 63/3
N	negative [1] 53/14	nomination [1] 62/25
name [25] 5/9 15/16 15/17 21/22 26/11 26/13 28/15 34/15 34/17 45/12 60/15 79/12 86/16 86/16 89/18 92/19 97/23 100/13 104/4 105/4 106/7 107/11 111/14 117/18 126/21	neighbor [1] 27/17	noncompliance [1] 41/13
named [1] 46/20	NEIL [5] 1/8 5/15 90/9 90/24 112/8	Norheim [3] 40/18 69/14 77/18
names [3] 45/13 84/25 110/11	NEVADA [18] 1/2 1/5 1/13 5/1 5/12 19/5 19/11 24/15 26/13 32/24 49/16 51/24 74/12 80/3	NORMA [1] 2/8 normal [5] 13/3 13/14 57/8 122/17 122/18
naming [1] 45/10		normally [2] 17/21 60/11
		North [2] 26/2 48/20
		not [92]
		note [3] 75/2 103/15 104/16

<p>N</p> <p>noted [1] 123/6</p> <p>notes [2] 103/12 125/10</p> <p>nothing [6] 15/4 16/4 21/8 73/5 78/25 79/18</p> <p>notice [9] 27/5 27/14 27/15 28/3 28/6 51/3 106/20 119/13 119/16</p> <p>noticed [3] 26/19 27/7 115/11</p> <p>noticing [2] 38/16 51/3</p> <p>notify [5] 26/25 27/2 27/3 27/21 51/5</p> <p>noting [1] 96/20</p> <p>now [27] 15/2 25/6 31/24 39/16 40/15 44/12 47/20 74/18 78/23 81/12 87/4 88/4 89/5 90/6 92/24 94/9 94/11 94/23 94/25 95/11 97/4 105/3 108/22 110/11 114/10 116/8 117/5</p> <p>NRS [16] 6/5 6/22 7/6 7/12 8/5 9/24 11/4 11/16 11/24 12/8 13/15 13/22 14/4 84/12 126/2 126/13</p> <p>number [23] 5/16 39/19 40/4 48/22 56/23 74/18 77/22 88/22 88/23 88/25 89/25 90/13 90/25</p>	<p>107/20 107/21 109/21 110/12 111/14 113/16 116/9 126/4 126/8 126/11</p> <p>Number 4 [4] 88/22 88/23 88/25 116/9</p> <p>Number 5 [1] 89/25</p> <p>Number 7 [1] 90/13</p> <p>numbers [2] 40/7 59/4</p> <p>nurse [3] 77/20 87/18 115/21</p> <p>nursing [5] 52/8 66/13 85/14 85/16 97/8</p> <p>O</p> <p>O'M [1] 79/14</p> <p>O'M-A-L-L-E-Y [1] 79/14</p> <p>O'MALLEY [6] 4/6 78/19 79/13 79/15 79/23 117/15</p> <p>objectives [4] 9/1 9/5 9/6 13/2</p> <p>obligation [1] 53/9</p> <p>obtain [5] 12/13 28/25 87/12 92/6 96/5</p> <p>obtained [15] 11/20 51/12 78/6 80/13 83/3 85/17 87/20 93/15 93/21 94/7 95/5 98/18 99/1 102/10 123/14</p>	<p>obtaining [3] 6/25 7/1 93/12</p> <p>Obtains [1] 10/10</p> <p>obvious [1] 83/12</p> <p>obviously [3] 18/8 55/9 60/12</p> <p>occurred [4] 8/1 8/3 108/16 117/23</p> <p>occurring [2] 78/5 123/13</p> <p>ODONOGHUE [1] 2/11</p> <p>off [15] 25/9 30/2 36/6 37/6 74/10 85/21 85/24 86/11 89/8 113/14 114/2 114/4 114/5 120/19 122/10</p> <p>off-site [1] 86/11</p> <p>offense [1] 11/23</p> <p>offenses [2] 15/9 79/5</p> <p>offer [2] 37/25 38/23</p> <p>offering [5] 7/3 13/21 13/22 15/10 79/6</p> <p>offers [1] 13/23</p> <p>office [66]</p> <p>office's [1] 30/8</p> <p>officer [10] 9/8 40/13 41/9 41/14 42/8 69/21 74/16 80/14 80/19 80/20</p> <p>officers [4] 41/10 80/14 82/22 86/22</p> <p>offices [2] 5/13 82/21</p> <p>official [2] 9/9</p>
--	---	--

O		
official... [1] 126/23	only [22] 5/16 6/3 17/17 18/4 22/4 22/4 22/5 22/5 27/14 27/15 28/23 31/3 31/4 32/16 41/14 43/15 71/3 71/25 73/22 87/7 116/5 118/16	38/14 81/9
often [26] 17/8 18/21 23/5 32/4 33/25 34/14 35/22 36/12 44/24 47/7 47/15 47/15 48/15 51/17 55/18 58/2 61/2 63/8 65/8 65/17 66/9 66/19 67/1 111/10 112/15 123/8	oo0oo [1] 124/8	originated [1] 121/15
Oh [4] 39/2 54/15 62/13 122/2	open [2] 113/1 121/24	other [23] 7/15 7/16 7/18 9/12 11/2 11/12 19/8 21/22 32/19 51/24 54/3 54/4 55/24 57/25 59/7 87/13 89/21 92/24 94/5 97/15 108/7 108/9 109/9
okay [72]	opened [1] 86/11	others [4] 8/24 32/1 73/4 109/7
older [13] 12/8 12/10 12/12 12/14 12/16 12/19 12/21 13/6 13/7 13/9 15/10 79/6 87/2	operated [3] 85/22 88/9 116/19	otherwise [1] 7/24
omission [1] 9/8	operating [1] 86/12	our [29] 7/4 11/3 14/17 29/25 30/11 30/12 30/15 31/16 31/23 51/19 55/18 56/5 58/8 59/13 59/14 64/15 67/2 67/6 68/17 69/18 69/20 70/18 73/6 76/1 80/13 81/1 81/3 81/20 90/7
omitting [1] 96/2	operation [4] 7/9 8/14 121/19 122/1	out [43]
on-the-job [1] 80/17	opinion [3] 24/6 28/21 88/5	outing [1] 57/14
once [22] 23/11 32/15 33/18 33/22 34/22 34/25 37/25 55/7 56/2 57/14 58/2 61/5 72/13 87/18 87/19 97/18 102/2 111/8 117/23 118/1 119/24 120/2	opportunities [1] 116/22	outside [1] 51/24
one [44]	opportunity [1] 50/23	outstanding [1] 38/21
one's [3] 22/1 50/2 77/11	order [17] 33/19 33/22 36/8 37/6 38/14 38/18 44/1 46/17 52/12 52/19 52/23 65/16 68/15 68/20 69/19 71/8 72/16	over [54]
ones [6] 18/25 30/21 35/11 38/9 82/20 110/11	ordered [2] 36/11 47/18	overall [1] 117/9
ongoing [1] 53/7	orders [4] 34/1 36/14 51/1 100/9	overbilled [1] 113/10
	ORESCHAK [1] 2/12	overhead [3] 30/12 30/13 59/14
	organic [1] 13/11	overseeing [1] 47/17
	organization [2] 7/8 7/10	overview [4] 94/23 95/11 97/23
	organize [1] 8/22	
	original [2]	

O	90/22 113/4 122/18	7/14
overview... [1] 104/3	papers [1] 103/24	parts [1] 51/25
owing [1] 53/10	paperwork [6] 46/2 61/5 112/5	party [8] 45/1 68/14 81/10 83/7
own [23] 10/24 13/1 13/4 17/1 25/8 25/8 34/11 43/1 43/7 53/2 61/10 65/4 69/18 85/21 85/21 85/24 86/9 86/11 92/17 97/12 101/22 101/23 120/20	112/16 112/19 112/23	83/8 87/21 97/14 115/17
owned [2] 97/12 116/18	paragraph [1] 10/14	passed [6] 20/12 62/18 70/6 70/15 76/7 102/3
owner [4] 10/23 11/10 11/15 43/21	parents [1] 27/3	passing [2] 84/15 109/1
ownership [3] 9/19 12/17 12/22	PARKS [106] Parks' [22] 83/4 83/10 83/12 83/18 85/9 86/20 86/24 91/7 91/12 93/14 97/24 98/16 98/21 99/21 100/14 103/5 106/17 109/19 111/12 113/6 115/19 121/25	past [4] 10/16 51/21 56/12 115/13
owns [1] 34/23	part [19] 8/10 29/11 35/14 42/2 42/2 43/8 52/19 55/1 55/5 60/5 72/2 87/14 93/12 93/22 95/4 100/10 103/5 121/13 122/11	patient [5] 65/25 66/8 100/25 105/14 106/14
P	participate [1] 8/19	pattern [1] 7/23
p.m [1] 1/15	particular [9] 11/17 20/18 23/21 49/2 55/4 100/7 110/23 120/17 121/20	PAUL [1] 2/3
pages [2] 88/1 88/16	particularly [1] 5/22	pay [19] 22/22 30/5 31/19 50/9 52/11 52/20 57/25 58/6 58/10 64/23 97/7 97/11 97/12 99/20 102/21 102/22 108/12 108/22 119/2
Pahrump [2] 100/20 101/18	parties [2] 14/22 15/23	payable [1] 38/7
paid [21] 21/20 25/9 46/4 61/18 62/5 68/14 68/19 68/21 93/6 96/18 96/19 99/16 99/17 100/1 102/23 103/2 103/3 109/12 110/4 118/5 118/25	partnership [1]	payback [1] 121/13
paintings [2] 23/25 50/15		paychecks [1] 93/16
pair [1] 57/20		payee [2] 23/5 110/18
paper [7] 38/16 89/5 89/8 90/21		paying [4] 33/15 53/4 97/9 101/16
		payments [1] 93/11
		payout [1] 18/5
		payroll [2] 93/14 93/24

P	112/15	15/8 79/4
pays [1] 25/12	performed [4]	petition [14]
PCA [2] 57/12	55/2 93/5 114/17	26/7 26/10 26/20
61/22	116/1	66/3 74/23 95/25
peace [3] 80/14	performing [2]	95/25 98/5 98/22
80/19 80/20	107/3 111/18	101/2 102/16
Pecos [2] 26/1	period [3] 10/9	106/17 119/15
26/2	44/6 50/8	119/18
penalties [2] 8/6	perishable [1]	petitioner [1]
13/15	51/13	26/11
penalty [2] 14/5	perjury [9] 7/2	petitions [5]
14/6	7/2 14/4 14/5	82/7 100/8 118/16
pending [4] 15/2	14/6 14/13 14/13	119/12 123/7
50/10 67/7 78/23	15/11 79/7	phantom [1] 70/14
pension [2] 23/4	permanently [1]	phone [1] 32/18
25/11	12/16	photo [1] 90/2
pensions [1]	permission [18]	PHOTOGRAPH [3]
60/25	37/8 37/12 37/23	4/7 4/8 4/9
people [32] 15/20	37/24 38/2 38/8	photos [1] 51/9
18/23 24/9 24/11	38/14 38/22 38/24	physical [4]
27/6 27/15 30/14	39/4 39/7 39/11	10/20 13/10 13/12
30/15 32/3 39/14	49/9 50/20 50/24	18/13
39/17 39/20 39/22	51/12 53/15	physically [1]
40/3 40/5 51/3	102/13	112/9
51/15 55/17 55/19	person [125]	physician [4]
55/19 55/21 60/1	person's [9]	17/25 52/9 65/5
67/7 70/4 73/15	12/14 12/15 23/8	77/19
73/20 74/10 74/20	23/21 29/2 29/19	physician's [1]
75/25 76/19 77/23	33/14 37/13 38/17	66/2
119/14	personal [9]	physicians [1]
per [7] 30/24	10/10 23/18 36/3	77/9
31/2 31/7 32/21	38/15 38/19 51/1	pick [1] 113/8
33/1 56/4 62/11	52/15 57/12 60/14	picture [6] 89/16
percent [8] 31/23	persons [3] 7/8	90/14 90/16 91/4
48/6 52/20 54/16	7/16 11/22	116/11 117/9
59/15 62/20 70/2	perspective [5]	pictured [1]
76/2	59/13 77/2 77/16	92/25
percentage [3]	116/11 117/9	pictures [1]
69/23 70/1 83/9	pertained [1]	95/12
perform [5] 13/14	87/16	pieces [1] 51/22
83/8 87/24 112/8	pertaining [2]	place [13] 51/14

P	poor [1] 46/8	practice [4] 33/7
place... [12]	portion [2] 11/9	53/25 73/6 84/20
59/17 65/13 67/14	35/23	practicing [1]
69/19 75/16 75/23	position [3]	121/24
96/2 96/4 98/7	71/12 80/5 91/8	practitioner [2]
98/9 99/19 125/9	possessing [1]	77/20 87/18
placed [4] 10/8	6/22	practitioners [1]
20/17 60/9 77/11	possession [4]	115/21
Plaintiff [1] 1/6	6/25 10/8 12/17	precedent [1]
plan [3] 5/18	12/22	52/3
37/23 65/8	possible [1] 29/9	preceding [1]
planning [8]	possibly [2]	126/4
45/20 47/21 48/1	54/15 64/21	prefer [1] 28/9
52/25 63/2 75/23	post [4] 80/13	preferable [1]
101/22 103/9	80/18 103/15	50/7
play [1] 20/13	104/16	preference [1]
please [16] 14/24	post-it [2]	63/4
15/15 15/24 43/24	103/15 104/16	premises [1] 44/2
47/19 70/19 71/15	potential [2]	premiums [1]
78/20 79/11 90/8	15/20 100/22	101/16
96/15 98/20 99/9	POUNCY [1] 2/13	prepare [1] 80/10
102/25 113/5	pours [1] 34/20	prepared [2] 4/6
113/24	power [42] 12/11	89/1
plus [1] 18/3	12/25 36/22 38/5	prescribed [1]
point [18] 14/8	38/7 45/6 45/7	10/9
14/16 15/21 20/13	45/9 45/11 45/13	presence [3]
30/23 42/24 45/18	45/22 46/1 46/4	29/10 78/5 123/13
58/2 77/20 81/6	46/12 46/14 46/17	present [8] 2/1
82/1 83/2 89/22	46/18 46/20 46/24	2/19 5/18 10/16
111/22 117/15	46/25 47/3 47/7	29/8 76/16 124/1
117/17 121/12	47/8 47/10 47/14	124/5
121/13	47/14 47/17 75/15	presentation [1]
police [6] 44/1	75/18 75/20 96/2	7/5
73/23 74/21 80/14	98/8 98/11 98/13	presented [2]
82/15 86/23	99/24 119/6 119/7	78/4 123/12
policy [10] 84/19	119/9 119/15	presenting [1]
101/17 101/17	119/21 119/24	5/14
102/2 102/6 102/8	119/25	preserve [1] 60/6
104/17 104/18	powers [7] 21/9	preserved [1]
104/23 105/1	21/11 36/25 37/17	51/11
poll [1] 15/20	38/6 38/6 119/20	pretense [2]

P		
pretense... [2] 10/15 10/19	proceeds [6] 8/8 8/10 8/10 9/14 102/5 102/7	5/13
pretenses [1] 7/2	process [7] 16/24 26/4 64/13 64/24	prosecution [1] 80/10
pretty [2] 25/12 48/19	71/2 76/13 121/9	prosecutors [1] 15/24
previous [2] 30/13 120/13	procures [1] 13/23	protect [3] 46/15 46/17 46/20
previously [4] 16/21 41/13 77/17 122/4	profession [1] 22/14	protected [3] 34/9 36/7 48/17
Print [1] 126/21	professional [43] professionals [1] 36/14	protection [4] 35/10 35/16 36/15 72/19
prior [10] 8/3 16/16 16/19 16/22 42/23 86/1 86/2 94/6 108/20 110/2	profit [2] 30/1 68/8	protections [1] 46/11
prioritize [2] 67/10 67/19	program [2] 92/5 126/15	Protective [3] 68/25 73/18 74/3
priority [4] 46/22 68/17 68/19 75/22	programs [1] 58/5 progress [1] 120/8	provide [12] 9/11 24/6 24/23 26/5 26/7 56/19 56/20 71/7 87/23 115/10 115/14 118/10
private [43] privates [1] 19/10	prohibited [2] 78/2 123/10 prolific [1] 121/8	provided [6] 54/6 57/11 61/16 85/19 86/7 97/15
probably [9] 6/2 25/9 39/12 52/20 55/9 70/8 81/19 82/1 87/5	prominent [1] 18/19	providers [1] 83/7
probate [6] 44/20 70/24 71/8 72/17 84/6 97/18	promise [1] 10/15 promote [3] 8/25 9/4 9/6	provides [2] 13/16 40/12
problem [2] 42/11 43/22	proper [2] 59/23 119/13	providing [8] 10/22 54/3 54/4 54/6 56/17 56/22 57/11 72/25
problems [3] 18/24 56/15 66/10	property [57] proposed [14] 4/4 26/9 26/13 26/14 26/15 26/19 27/2 27/23 29/7 29/12 67/11 67/20 68/11 70/18	provision [1] 115/4
procedures [2] 21/17 37/9	propriatorship [1] 7/14	provisions [1] 9/21
proceedings [7] 1/19 5/7 78/1 123/9 124/6 125/8 125/13	prosecuting [1]	public [44] punishable [4] 78/8 78/10 123/16 123/18
		punished [4] 6/10

P	quickly [1] 66/16	10/10 21/22 22/9
punished... [3] 6/15 6/17 6/21	quite [7] 14/20 15/22 17/8 37/2 37/15 38/9 116/9	26/23 37/25 38/10 67/25
Punishments [1] 9/22	R	realistically [1] 59/18
purchase [3] 61/13 61/17 92/6	racketeering [18] 6/5 6/6 7/11 7/20 7/21 7/22 8/4 8/6 8/9 8/15 8/20 8/21 9/13 9/17 15/9 79/5 88/11 116/12	really [27] 7/4 17/20 24/11 33/9 34/2 34/23 39/20 41/20 41/25 42/1 42/7 42/9 45/17 46/9 46/10 46/19 47/12 48/1 52/9 54/8 54/23 56/16 59/23 63/12 67/19 70/11 103/19
purchased [1] 101/20	raise [2] 14/24 78/20	reason [13] 10/25 17/8 22/9 35/8 42/18 43/11 59/4 62/8 62/16 64/25 110/7 118/18 119/13
purely [1] 116/19	Raman [2] 2/20 5/10	reasonable [3] 11/19 54/1 54/11
purpose [2] 7/11 33/15	ran [1] 97/1	reasonableness [2] 54/1 54/25
purposes [1] 84/25	range [2] 18/2 56/24	reasons [2] 48/23 121/7
pursuant [2] 11/21 126/2	rarely [1] 30/25	recall [4] 30/17 96/11 102/23 103/14
put [16] 37/8 42/23 45/19 48/2 50/25 51/9 52/1 60/24 75/23 88/22 89/4 94/11 94/11 95/25 96/3 98/8	rate [16] 30/15 30/23 53/23 54/5 56/19 56/21 57/4 57/4 57/12 57/19 61/13 62/9 73/1 73/3 73/11 111/23	receipt [3] 28/7 109/25 110/3
putting [3] 38/16 49/24 108/5	rates [5] 30/17 54/12 57/8 59/16 117/3	receive [16] 23/2 25/10 29/24 30/6 60/10 64/14 73/23 81/9 81/24 84/14 102/2 102/5 102/7 106/20 114/9 119/1
Q	rather [2] 47/18 57/18	received [16] 8/7 69/25 70/18 81/21
qualifications [3] 19/2 19/4 20/19	ratio [1] 31/9	
qualified [2] 91/25 92/12	reach [2] 74/21 89/7	
quarterly [1] 32/17	reached [1] 82/14	
question [5] 14/8 99/14 106/8 120/23 120/25	read [2] 5/19 5/22	
questions [7] 14/15 71/14 71/15 77/25 117/11 117/14 122/14	readily [2] 11/7 11/13	
quick [3] 26/23 38/10 103/19	real [8] 8/13	

R	refer [3] 64/19 71/5 121/16	103/6 103/12
received... [12] 81/25 82/1 82/15 83/11 87/17 100/19 100/24 105/12 106/13 111/9 114/6 115/24	reference [1] 110/15	relation [3] 26/19 27/8 70/22
receives [4] 5/22 35/14 64/15 81/1	referral [10] 67/4 67/12 68/1 68/24 100/19 100/24 105/12 106/13 121/9 121/12	relations [1] 27/19
receiving [4] 6/16 6/19 6/22 60/8	referrals [5] 64/14 64/15 66/23 68/4 91/14	relative [1] 106/21
recent [1] 40/13	referred [2] 68/20 100/21	relevant [3] 11/14 104/10 122/12
recently [2] 20/12 42/3	referring [3] 115/6 121/3 121/11	remain [1] 49/12
Recess [1] 58/15	refresh [3] 96/15 99/9 102/25	remained [1] 49/15
recognize [2] 88/23 88/25	refuse [3] 43/25 68/2 68/8	remaining [1] 105/21
recollection [2] 70/7 102/25	regard [2] 17/3 34/3	remains [1] 113/9
recommending [1] 48/1	regarding [15] 9/24 11/16 12/7 14/4 17/4 18/18 19/1 20/12 20/14 21/2 47/21 58/17 69/2 76/6 103/16	remember [1] 27/24
reconvene [1] 124/6	registered [3] 13/24 14/1 84/7	remove [1] 99/19
record [12] 13/22 13/23 15/11 15/16 15/19 19/25 59/17 79/7 79/12 102/14 122/8 125/12	regular [1] 56/7	removed [1] 44/1
recorded [2] 13/25 14/1	related [17] 6/6 7/22 8/4 8/6 20/9 87/21 89/1 91/14 93/14 94/19 95/5 98/17 98/18 106/18 107/3 120/9 122/19	rendered [5] 63/7 88/13 95/4 108/13 108/15
records [20] 83/4 83/23 85/17 87/15 87/16 93/13 93/14 93/25 95/19 98/17 100/2 100/3 100/6 106/11 107/4 108/14 110/2 111/19 113/6 116/17	relating [2]	rent [4] 25/8 25/12 36/2 97/8
		reoccurring [2] 60/8 60/25
		replace [1] 42/23
		replacement [1] 122/5
		report [11] 23/19 35/16 96/14 99/8 100/23 102/25 103/14 103/19 103/20 105/25 109/10
		reported [2] 1/25 23/21
		Reporter [1] 126/23
		REPORTER'S [2]

R		
REPORTER'S... [2]	38/15 38/16 62/24 72/1 76/18 77/12	resumes [1] 85/13
1/19 125/1		resuscitate [1] 47/24
reporting [3]	requirements [5] 20/5 23/9 24/13	retrieve [1] 30/5
24/12 69/16 81/10	69/16 69/20	return [3] 28/7
represent [6]	requires [5] 23/12 39/11 51/2	52/10 52/22
62/2 62/8 95/12	75/21 84/12	returned [1] 99/24
109/22 112/18	rescind [1] 46/25	review [19] 24/5
112/21	research [4] 37/10 80/9 82/9	31/16 81/9 82/5
representation [1]	92/3	87/6 93/17 95/19
10/16	reserve [1] 52/1	100/2 100/6 102/4
representations	reside [2] 19/10	102/14 103/19
[2] 98/6 98/22	21/13	106/11 106/16
representative [2]	resident [1]	107/25 111/19
23/5 110/18	19/12	113/6 115/7 115/8
representatives	resigned [1]	reviewed [15]
[1] 110/23	122/4	82/4 87/8 87/14
represented [2]	response [2]	87/15 87/16 87/20
85/13 112/1	15/22 82/17	87/25 88/16 92/17
representing [1]	responsibilities	93/15 93/24 94/8
113/11	[1] 49/17	98/16 108/15
represents [6]	responsibility [6]	114/2
9/14 31/8 107/21	49/19 57/21	reviewing [11]
109/23 111/1	60/19 65/24 76/1	55/16 56/8 83/22
111/6	82/11	88/4 91/11 93/13
request [6] 2/19	responsible [5]	102/24 103/15
31/15 43/3 53/15	21/24 35/4 35/11	106/24 107/4
102/11 102/15	64/8 73/15	116/17
requesting [1]	rest [2] 93/10	revision [1]
43/9	97/4	24/12
require [12]	restrict [5]	rhyme [1] 59/3
20/22 29/7 31/2	13/13 43/12 43/18	rid [1] 50/21
32/13 32/14 34/1	43/19 47/4	right [25] 8/12
35/21 50/19 69/4	result [1] 17/13	14/24 28/12 31/23
76/7 77/16 77/21	resulting [1]	39/22 47/6 61/2
required [4]	11/10	78/20 84/22 87/9
24/22 35/6 106/19	results [2] 7/23	90/7 90/22 91/12
126/11	84/15	91/19 92/25 94/2
requirement [12]	resume [1] 92/15	95/8 96/24 97/21
19/20 20/10 21/2		99/11 108/17
21/4 24/19 25/3		

R		
right... [4]	39/15 43/17 46/9	110/13 111/4
109/2 113/18	49/25 50/24 59/13	113/23 116/12
115/3 121/6	60/20 63/7 63/12	119/18
rights [1] 48/16	66/12 74/2 80/18	scam [7] 110/14
risk [5] 28/19	83/17 84/21 87/8	111/5 112/5 113/4
37/5 38/3 51/18	91/17 91/24 92/1	113/23 113/25
67/13	92/12 92/21 97/1	114/7
road [1] 45/24	97/2 104/20 117/5	scenario [1]
robbery [2] 6/11	117/11 122/9	65/11
6/13	125/9	schedule [2] 30/8
role [5] 17/17	salary [4] 29/24	30/11
32/5 32/9 81/12	93/7 93/11 93/22	scheme [6] 11/21
115/10	sale [7] 37/25	110/23 111/23
rolls [1] 70/4	38/1 106/25 107/1	112/20 114/12
room [1] 36/2	107/3 107/5 107/7	117/19
rough [1] 70/13	sales [2] 51/18	schemes [6] 89/2
round [1] 55/12	108/8	94/10 94/19 95/13
routinely [1]	Sally [1] 102/1	114/16 117/6
110/17	same [21] 7/22	schizophrenia [1]
row [5] 105/4	54/4 55/25 63/9	45/25
110/10 113/22	82/20 91/20 106/8	school [1] 21/7
114/10 114/11	112/13 113/12	score [1] 84/15
rules [3] 33/5	113/12 115/15	screen [5] 89/6
74/8 85/4	115/18 115/21	89/14 90/20 92/25
ruling [1] 75/12	118/4 118/5 118/8	107/11
run [2] 99/21	120/15 120/19	scrutiny [1] 92/9
109/15	120/20 120/25	search [3] 27/24
running [1] 88/6	123/7	86/24 103/5
Ruth [6] 106/7	San [1] 49/8	searched [1] 87/1
106/8 106/14	satisfied [1]	searches [1]
106/23 107/2	11/9	27/24
107/8	say [49]	second [5] 84/21
	saying [8] 37/5	88/23 89/3 93/10
	43/5 47/19 68/6	110/10
	70/19 86/9 94/1	secret [2] 78/2
	95/2	123/10
S	says [16] 11/25	Secretary [2] 2/4
safe [3] 34/19	29/15 32/2 41/23	2/5
36/7 67/15	42/25 47/10 77/22	section [1] 9/21
safeguard [2]	89/10 94/10	secured [1] 37/4
49/18 57/22	100/13 109/16	security [10]
said [31] 17/19		
18/2 37/17 39/2		

S	59/23	100/25
security... [10]	send [1] 51/5	several [8] 11/2
23/4 25/11 60/10	senior [1] 121/10	62/11 81/25 96/1
110/14 110/17	sense [2] 47/17	99/23 112/11
110/22 110/23	86/13	113/11 122/4
110/25 126/8	sent [3] 51/20	sexual [2] 6/11
126/11	53/19 97/17	6/13
seduction [1]	sentimental [1]	shall [4] 11/11
6/13	51/6	11/18 15/3 78/24
see [16] 18/21	separate [3]	she [78]
18/25 31/16 43/10	34/12 44/23 73/9	she'd [1] 110/4
48/2 49/11 57/10	September [1]	she's [3] 40/14
82/15 89/4 89/6	86/22	84/4 84/16
90/21 95/2 110/10	September 21 [1]	sheets [1] 94/7
117/18 121/2	86/22	SHERRY [1] 2/5
122/20	series [3] 81/20	shoes [1] 33/14
seeing [2] 55/19	92/6 93/5	shopping [1]
55/21	serve [6] 17/17	61/21
seek [2] 26/24	19/12 32/9 44/22	short [3] 50/8
27/18	45/4 72/25	77/6 106/3
seeking [4] 20/23	serves [2] 20/6	shorthand [2]
24/8 29/4 106/20	21/4	125/7 125/10
seem [1] 99/13	service [9] 17/22	Shortly [1]
seemed [2] 92/8	54/5 57/10 93/24	102/10
105/19	99/21 111/25	should [27] 6/1
seen [11] 18/15	114/17 114/19	15/23 15/25 33/9
18/20 41/11 46/12	115/5	39/6 40/3 43/9
47/15 62/13 66/9	services [43]	43/15 44/24 45/23
66/11 66/25 108/8	session [1] 5/17	47/24 54/22 54/23
109/7	sessions [1] 5/18	59/17 61/12 63/19
seized [7] 85/12	set [9] 30/11	63/21 63/21 63/24
87/7 87/11 95/22	30/15 33/4 33/6	64/3 74/13 74/14
98/25 103/4	35/22 41/5 59/16	81/4 90/21 96/19
104/13	72/19 73/19	101/12 123/6
seizing [1] 86/19	setting [1] 61/3	shouldn't [3]
sell [10] 38/11	settle [2] 38/20	33/9 54/8 59/19
38/14 38/19 51/1	38/24	show [9] 24/25
51/12 51/21 51/22	settlement [1]	26/11 28/1 33/12
52/4 52/12 52/13	38/23	33/17 42/17 44/11
selling [5] 38/17	seven [4] 19/8	52/24 94/4
50/17 51/4 51/13	19/23 19/24	showed [6] 85/12

S		
showed... [5] 85/17 110/2 111/19 113/7 115/8	111/20 111/22 111/25 112/8 112/12 114/1 114/15 116/6 116/19	93/18 94/3
showing [5] 25/1 53/14 73/8 90/13 90/25	simple [3] 94/15 94/23 108/4	sole [1] 7/13
shut [2] 60/14 122/3	since [2] 16/14 16/17	solemnly [2] 15/1 78/22
siblings [1] 27/5	single [1] 63/25	solvent [1] 31/19
sic [1] 6/22	sister [1] 26/25	some [74]
side [5] 18/6 37/13 37/14 51/9 90/22	sit [2] 56/11 56/13	somebody [34] 17/6 18/8 18/11 18/14 18/19 22/9 22/12 23/7 24/8 33/11 34/4 36/21 37/8 39/14 42/13 42/19 45/9 45/13 46/22 49/6 49/8 54/6 57/11 59/5 59/6 60/11 64/11 65/2 65/8 65/24 66/4 70/23 77/11 85/3
sign [3] 66/2 77/17 104/18	site [1] 86/11	somebody's [3] 23/4 38/20 57/7
signatory [1] 77/13	sits [1] 35/3	somehow [1] 119/8
signature [3] 7/1 92/19 126/19	sitting [1] 65/9	someone [27] 17/9 19/11 20/16 21/13 32/7 37/4 37/5 42/5 42/6 42/10 43/4 46/17 47/18 52/21 56/22 58/5 59/19 65/17 67/4 67/15 74/15 74/16 75/22 75/23 77/5 85/1 85/3
signed [2] 37/6 92/19	situation [6] 28/12 45/11 47/24 53/13 61/18 63/13	someone's [3] 23/12 28/17 32/19
significance [1] 103/6	situations [4] 46/13 77/18 82/8 123/2	something [19] 17/13 18/6 20/6 28/1 32/2 41/24 42/1 42/22 45/23 46/1 48/25 50/20 54/8 54/24 56/12 68/17 74/23
significant [5] 36/21 42/17 51/25 53/2 87/13	six [3] 69/9 110/24 111/2	
significantly [1] 50/22	size [1] 24/13	
similar [7] 7/23 23/6 61/9 67/22 82/16 98/4 112/20	skill [1] 55/3	
SIMMONS [28] 1/8 5/15 15/11 79/8 90/11 90/14 90/17 91/6 91/7 91/9 91/10 91/15 91/24 92/11 92/18 105/16 111/8 111/13 111/17	skilled [2] 66/13 97/8	
	slip [2] 60/21 111/14	
	slips [1] 111/16	
	small [3] 22/10 112/23 121/11	
	so [168]	
	social [12] 23/4 25/10 42/5 58/4 60/10 110/14 110/17 110/21 110/22 110/25 126/8 126/11	
	software [2]	

S	specific [12] 22/9 34/1 38/5 40/4 40/22 43/22 49/13 53/23 94/5 119/18 120/15 126/12	start [3] 6/5 45/15 95/23
something... [2] 104/10 123/1	specifically [3] 50/15 73/5 81/7	started [5] 14/19 81/17 96/21 101/10 105/3
sometimes [15] 17/10 17/12 18/22 34/17 35/21 46/15 47/6 47/16 73/17 77/5 110/21 111/21 112/2 115/18 121/14	specifics [2] 105/25 117/12	state [22] 1/5 14/2 15/15 19/4 19/11 24/14 26/10 26/12 29/13 49/7 49/13 49/15 50/10 54/21 70/17 79/11 85/17 104/14 122/8 125/3 126/12 126/16
somewhat [3] 35/10 36/19 59/24	spell [2] 15/16 79/12	State's [2] 78/18 82/9
somewhere [4] 48/24 48/25 70/10 85/25	spend [1] 31/3	stated [2] 103/24 109/25
son [1] 106/19	spending [2] 54/22 56/7	statement [13] 10/16 14/4 14/7 14/9 14/11 78/5 104/14 104/16 104/21 104/24 104/25 105/18 123/13
soon [1] 76/17	spent [13] 44/25 53/18 63/12 63/23 74/10 96/9 96/12 97/13 99/12 99/18 114/22 123/4 123/5	statements [3] 28/24 78/4 123/12
sorry [11] 19/8 31/21 32/24 43/23 69/10 90/10 90/11 93/9 94/1 104/12 122/2	split [3] 24/15 55/20 63/22	States [1] 14/3
sort [15] 18/14 71/20 82/25 93/3 95/10 95/13 100/12 104/2 107/10 108/8 109/15 110/10 116/10 117/8 121/1	spoil [1] 50/21	stating [3] 18/1 74/8 110/3
sound [1] 59/10	spouse [1] 99/21	statute [7] 9/23 32/2 62/4 62/20 72/20 77/12 77/22
sounds [1] 88/15	spread [1] 39/25	statutes [11] 6/19 7/4 14/16 21/8 32/23 39/9 50/6 53/24 73/6 74/12 74/13
source [1] 9/19	Ss [1] 125/3	statutorily [2] 27/15 69/19
Southern [1] 121/8	stack [1] 70/11	statutory [5]
special [2] 28/4 38/8	staff [5] 61/24 66/2 115/19 116/2 117/3	
specialist [5] 85/16 91/25 92/8 92/13 92/20	standard [3] 11/19 33/1 50/25	
	standards [15] 32/22 32/25 33/4 33/7 39/8 43/8 49/24 50/4 53/25 54/21 57/6 57/9 73/6 80/14 84/19	
	standpoint [2] 63/15 65/1	

<p>S</p> <p>statutory... [5] 6/13 11/24 13/16 39/12 83/14</p> <p>stay [3] 53/1 58/5 58/7</p> <p>stealing [1] 41/7</p> <p>Steel [2] 40/11 70/8</p> <p>Stenotype [1] 125/7</p> <p>step [5] 32/9 33/14 66/17 68/23 75/24</p> <p>steps [3] 59/5 81/18 83/1</p> <p>sterilization [1] 37/9</p> <p>still [17] 24/21 24/25 25/21 27/4 34/15 36/25 46/4 51/2 61/10 67/7 76/14 76/15 120/5 120/9 121/19 121/24 121/25</p> <p>stocks [1] 38/3</p> <p>stole [1] 109/24</p> <p>stolen [3] 6/19 6/23 11/1</p> <p>stop [2] 93/9 120/1</p> <p>storage [1] 87/1</p> <p>stories [1] 57/8</p> <p>straight [1] 30/6</p> <p>stroke [1] 18/23</p> <p>strokes [1] 18/23</p> <p>structured [1] 7/8</p> <p>stuff [2] 37/22 88/1</p> <p>submit [3] 26/4</p>	<p>77/21 77/23</p> <p>submitted [3] 102/11 103/21 109/25</p> <p>subornation [2] 7/2 14/13</p> <p>suborns [1] 14/10</p> <p>subpoenas [1] 83/3</p> <p>subsection [3] 6/21 12/24 14/12</p> <p>Subsequently [1] 102/16</p> <p>substitutes [1] 13/2</p> <p>successive [1] 42/20</p> <p>successor [5] 44/17 44/19 44/22 45/1 45/3</p> <p>such [12] 14/11 23/17 29/14 37/9 60/8 60/23 68/15 83/25 102/15 116/23 119/9 121/8</p> <p>sudden [1] 66/3</p> <p>Suffers [1] 13/9</p> <p>sufficient [1] 46/19</p> <p>suggest [1] 37/11</p> <p>summary [7] 24/16 25/7 25/7 25/13 25/15 25/19 25/21</p> <p>supersedes [1] 119/21</p> <p>supervise [5] 8/23 39/15 39/18 39/20 76/19</p> <p>supervised [2] 55/24 63/9</p>	<p>supervising [1] 41/1</p> <p>supervision [1] 125/11</p> <p>supervisor [1] 16/21</p> <p>supervisors [1] 81/3</p> <p>supplement [1] 58/6</p> <p>support [3] 47/22 47/23 48/16</p> <p>suppose [1] 92/9</p> <p>supposed [2] 54/18 55/6</p> <p>sure [23] 14/20 21/14 21/16 22/23 26/18 30/20 34/8 35/12 35/13 41/6 46/3 49/21 52/1 54/16 56/13 59/15 63/13 69/19 81/19 83/21 99/14 99/15 112/7</p> <p>surgery [1] 21/17</p> <p>suspends [1] 119/19</p> <p>swear [2] 15/1 78/22</p> <p>sworn [5] 5/5 16/2 79/16 80/19 80/20</p> <p>syndicate [7] 7/7 7/7 8/23 9/1 9/4 9/5 9/7</p> <p>system [2] 41/8 94/6</p> <hr/> <p>T</p> <hr/> <p>take [31] 31/18 31/21 44/7 44/8</p>
---	---	--

T	90/9 90/24 91/1	terminated [1]
take... [27]	91/4 91/6 92/24	44/5
44/18 47/11 51/14	93/5 94/5 112/5	termination [1]
51/16 54/8 58/12	112/8 112/14	24/22
58/14 60/11 60/12	113/3 113/7	terms [3] 7/17
61/24 64/5 66/4	Taylor's [1]	85/9 94/22
66/20 68/1 68/11	93/15	testified [2]
68/13 68/23 83/1	teaming [1] 82/25	16/4 79/18
84/14 87/24 95/7	technically [1]	testify [2] 16/3
99/11 101/25	75/7	79/17
105/20 111/16	telephone [1]	testimony [4]
118/15 119/9	74/18	15/1 15/8 78/22
taken [6] 1/13	telephones [1]	79/4
12/9 27/22 56/10	43/13	testing [2] 33/15
56/14 63/14	tell [28] 30/25	76/23
takes [4] 23/7	42/10 59/12 74/22	tests [3] 84/14
31/7 55/25 63/10	77/1 77/15 80/1	84/15 85/2
taking [9] 6/11	81/17 83/20 84/9	than [25] 12/1
26/15 59/17 59/19	86/16 86/20 89/9	12/4 13/17 13/18
60/20 66/8 108/4	98/3 99/12 101/6	13/19 24/17 24/18
110/5 116/8	105/8 106/2	25/3 41/13 47/14
talk [4] 48/9	106/11 107/15	47/18 48/10 53/9
56/11 94/20	107/21 110/13	54/20 56/19 57/4
104/11	111/5 112/6	57/18 62/9 64/21
talked [3] 52/8	113/23 114/13	66/20 67/2 67/14
95/13 116/9	115/5 116/14	97/7 105/14
talking [5] 27/23	telling [2] 71/8	111/20
55/15 89/12 89/15	110/6	thank [8] 15/6
118/12	tells [1] 108/1	72/7 78/15 78/17
TALKINGTON [1]	temporary [3]	79/2 79/25 123/23
2/14	22/11 100/8 100/9	124/2
task [6] 31/7	ten [6] 45/8	that [699]
111/18 111/19	54/25 63/11 107/2	that's [49]
112/15 112/20	107/5 112/2	theft [14] 9/24
113/11	tendency [1] 68/6	9/25 10/1 11/6
tasks [3] 40/2	term [8] 13/3	11/17 11/18 11/25
60/7 61/25	20/14 20/14 22/13	12/1 12/3 12/5
taxes [2] 64/6	23/5 52/25 77/6	15/9 79/5 117/23
64/8	77/6	118/1
TAYLOR [17] 1/8	terminate [1]	thefts [4] 11/20
5/15 15/12 79/8	95/1	94/11 95/5 95/5

T	47/25 75/14 82/9	11/25
their [94]	82/12 108/8	thresholds [1]
theirs [1] 27/4	things [15] 33/9	13/16
them [59]	33/25 37/2 37/16	through [27] 8/15
themselves [5]	46/7 47/9 50/4	8/20 8/21 12/13
17/10 27/3 36/16	50/22 55/16 60/24	20/10 51/15 56/23
42/9 116/4	67/24 82/5 92/18	58/4 67/8 70/21
then [46]	102/14 116/9	71/22 72/1 74/18
theories [1] 11/2	think [16] 15/21	76/13 80/13 80/18
there [164]	19/10 39/5 40/7	83/3 87/17 88/2
there's [49]	40/14 51/22 70/9	88/9 91/11 98/12
thereafter [1]	73/2 73/4 84/21	101/21 103/24
125/9	86/15 86/19 91/17	107/4 116/21
thereof [1] 8/11	100/12 113/22	119/6
these [57]	124/5	throughout [8]
they [155]	thinking [1] 19/9	32/17 39/25 81/25
they'd [2] 44/16	third [8] 45/1	83/21 85/11 88/7
44/19	68/14 83/7 83/8	118/4 121/22
they'll [6] 30/15	87/21 90/19 97/14	thus [1] 117/10
34/14 36/3 53/1	115/17	ticking [1] 61/6
58/6 74/21	thirty [2] 58/24	tight [1] 121/11
they're [41]	58/25	time [57]
21/11 21/16 22/20	thirty-five [2]	timekeeping [3]
22/20 28/18 29/17	58/24 58/25	93/18 93/23 94/3
31/17 31/22 35/11	this [125]	times [5] 43/15
36/2 37/5 37/18	those [44]	48/17 64/3 93/25
41/6 41/22 43/5	though [2] 34/11	118/6
43/6 44/23 44/25	75/11	title [6] 8/12
45/4 45/11 45/16	thought [1] 89/20	16/20 40/19 85/1
47/23 49/20 51/11	thousand [1]	92/3 126/23
52/7 55/20 55/21	99/23	titles [1] 91/21
56/1 59/6 59/21	thousands [4]	today [7] 15/7
61/17 64/20 65/6	74/10 88/3 88/3	79/3 79/25 117/8
65/7 65/15 66/10	88/16	117/11 121/12
66/11 73/17 76/14	three [14] 20/9	124/2
119/17 122/25	39/15 55/19 55/21	together [4]
they've [9] 18/23	57/1 76/20 96/20	45/20 49/25 94/11
41/10 43/8 43/17	96/24 96/25 97/20	116/8
46/22 50/13 65/4	107/1 107/2 107/6	toilet [1] 113/4
70/10 123/1	121/23	toiletries [1]
thing [6] 33/18	threshold [1]	113/14

T	1/19 125/12 126/4	16/3 16/4 78/24
told [1] 42/7	transfer [2] 10/4	78/24 78/25 79/17
too [2] 101/9	10/19	79/17 79/18
123/1	transferred [1]	try [14] 18/7
took [21] 54/20	49/11	23/16 25/6 27/19
54/24 70/8 81/18	transferring [1]	27/22 28/1 45/15
85/2 96/8 98/24	6/19	49/3 64/19 67/10
102/20 108/11	transpired [2]	74/20 74/22 77/2
110/3 110/20	78/3 123/11	110/8
111/19 112/1	transport [2]	trying [6] 26/20
112/19 112/22	9/10 9/10	26/24 27/18 41/15
113/11 114/21	traumatic [2]	44/25 77/4
117/24 118/1	18/16 49/14	tubes [1] 48/6
118/16 125/7	travel [6] 60/22	Tuesday [2] 1/14
top [6] 89/10	63/10 63/18 63/22	124/7
90/22 94/9 100/13	110/21 111/16	turn [2] 42/7
105/4 109/16	trier [1] 11/11	72/16
total [5] 63/11	trip [1] 55/12	turned [1] 117/20
96/22 110/24	trips [1] 112/1	two [28] 5/13
111/3 114/25	trouble [2]	5/13 7/21 24/15
toward [2] 92/9	101/22 122/25	26/18 26/23 27/8
97/9	true [3] 10/23	27/16 27/19 44/23
track [1] 69/21	14/10 125/12	47/10 54/24 56/25
traffic [1] 91/13	Trumbich [12]	58/24 58/25 63/20
trailer [1]	95/18 95/20 95/22	63/25 64/1 69/10
101/20	96/1 96/4 96/6	76/12 84/11 85/18
trained [5] 83/24	96/7 96/20 97/12	89/21 107/18
84/1 84/3 91/18	98/5 116/23	110/24 112/19
91/23	117/18	114/10 120/16
training [6]	Trumbich's [3]	type [6] 62/25
80/11 80/14 83/12	95/24 97/5 117/24	72/15 72/19 73/12
85/4 85/6 92/5	trust [12] 7/14	82/17 86/4
trainings [2]	12/10 12/25 39/3	types [9] 17/19
80/13 80/15	44/13 44/13 44/15	17/21 22/1 47/8
transaction [2]	44/15 44/17 44/18	60/2 61/25 66/14
9/16 9/18	44/22 105/14	68/14 88/18
transcribe [1]	trustee [5] 39/3	typical [1] 80/24
5/6	44/19 44/22 45/2	typically [3]
transcribed [1]	45/3	81/1 81/2 119/8
125/10	truth [12] 15/3	
transcript [3]	15/3 15/4 16/3	

U	53/9	upkeep [1] 53/5
Uh-huh [3] 20/4	undue [2] 12/14	upon [5] 15/2
55/8 107/14	12/24	46/5 78/23 98/21
ultimate [2]	union [1] 7/15	106/16
49/19 117/1	unit [1] 81/13	ups [1] 76/3
ultimately [8]	United [1] 14/3	upsets [1] 43/16
42/22 49/5 92/6	units [1] 87/1	us [36] 51/6 51/8
97/17 101/1	unlawful [3] 8/5	68/17 71/7 71/8
102/17 109/19	8/6 9/15	72/15 77/5 78/3
123/5	unless [2] 42/7	79/25 80/1 81/17
unable [5] 45/4	50/20	83/20 84/9 85/7
47/11 50/8 65/6	unnecessary [6]	86/15 86/16 86/20
65/22	114/8 115/5 115/9	89/3 89/9 98/3
unauthorized [1]	116/5 116/22	101/6 105/8 106/2
10/4	117/1	106/11 107/15
unaware [1]	unqualified [1]	107/21 110/13
119/17	14/9	111/5 112/6 113/4
undated [1] 85/13	unrelated [1]	113/23 114/13
under [20] 6/12	19/17	115/5 116/14
10/22 14/2 14/5	until [3] 42/3	123/11 124/3
14/6 17/15 23/25	76/17 93/6	use [16] 8/9 8/11
39/3 40/6 60/7	unwilling [1]	9/12 10/10 10/14
60/9 61/10 77/11	45/4	10/24 12/11 12/17
77/18 82/11	up [37] 18/3	12/22 12/25 28/14
106/19 107/8	26/17 27/9 31/9	33/24 83/13 88/10
109/21 120/7	31/23 35/22 41/5	118/4 118/8
125/10	42/22 43/3 44/6	used [25] 10/13
underlined [1]	44/9 53/18 58/17	10/17 12/24 20/15
104/19	61/4 72/14 72/19	23/5 28/25 36/12
underneath [2]	73/19 75/8 76/17	36/13 36/15 43/15
89/18 110/12	77/25 78/8 82/25	50/11 51/21 52/14
undersigned [1]	88/22 89/4 89/14	83/8 93/24 97/7
126/4	93/6 94/12 105/20	97/10 97/11
understand [7]	107/12 107/20	102/21 108/12
15/13 41/16 72/9	108/19 111/21	109/12 111/10
78/13 79/9 121/16	113/8 113/20	120/18 120/20
123/21	120/8 123/5	121/21
understanding [6]	123/16	uses [2] 10/6
64/14 64/17 68/13	upcoming [1]	51/19
69/20 70/2 117/13	26/22	using [3] 99/20
underwater [1]	updated [1] 43/10	99/22 119/2

U	121/9 121/10	vulnerable [8]
usually [6] 22/15	vetted [2] 84/17	12/8 12/11 12/12
26/15 28/11 35/15	85/3	12/14 12/16 12/20
52/19 111/20	victim [1] 81/2	12/21 13/8
utilized [1]	victims [6] 7/23	W
115/18	110/12 110/24	wait [5] 67/3
V	111/3 111/5 112/5	67/5 67/18 112/9
valley [1] 66/13	viewed [1] 122/8	112/18
valuable [1] 24/2	viewer [1] 113/21	waiting [1] 67/9
value [19] 11/4	views [1] 44/24	waive [1] 29/19
11/4 11/5 11/6	violate [1] 9/20	waived [1] 24/20
11/7 11/12 11/12	violates [2] 9/9	walk [1] 89/14
11/15 11/19 11/25	9/21	walks [1] 60/1
12/2 12/4 23/24	violation [5]	walls [1] 24/1
50/23 51/6 51/23	6/15 6/18 6/20	wander [1] 37/6
51/25 53/8 53/10	6/21 39/12	want [39] 5/19
valued [3] 6/23	violence [1] 8/25	23/17 26/4 26/15
6/24 6/25	virtually [2]	26/17 34/8 37/4
variety [2] 5/21	44/14 60/13	37/22 38/22 42/13
59/24	visit [11] 33/1	42/25 43/1 43/17
various [2] 7/3	43/17 43/18 43/24	45/10 48/4 48/4
22/1	56/1 56/4 63/10	48/5 48/14 48/19
vastly [1] 57/4	63/17 114/6	51/22 52/1 53/4
Vegas [9] 1/13	114/21 114/21	62/17 65/1 68/1
5/1 48/20 82/14	visitation [2]	76/1 89/22 89/23
82/18 82/23 85/19	55/7 63/19	92/22 93/9 93/10
86/23 125/14	visited [2] 87/19	94/20 94/22 95/10
vehicle [3] 6/20	113/7	95/16 104/8
25/9 38/11	visiting [2] 43/5	104/10 122/16
vehicles [1] 50/3	115/21	124/2
vehicular [1] 6/9	visitor [3] 43/16	wanted [8] 14/19
ventilation [1]	43/18 43/22	37/17 39/2 48/10
48/5	visits [13] 40/1	48/11 102/1 104/2
ventilator [1]	43/12 49/4 56/6	117/8
105/11	97/10 105/17	wanting [2] 68/18
verbal [1] 10/20	114/3 115/12	71/24
versus [1] 66/18	115/14 115/16	ward [85]
very [9] 30/25	115/19 115/19	ward's [13] 29/10
44/23 47/10 49/13	115/20	49/18 50/17 52/4
51/7 98/4 101/9	voices [1] 46/6	60/14 63/5 63/23
	VOLUME [1] 1/21	

W	58/13 66/21 67/13	Westmeyer [2]
ward's... [6]	70/20 73/8 75/25	2/21 5/11
64/6 69/3 95/8	77/4 77/7 89/3	what [130]
111/14 120/6	89/12 117/6 117/7	what's [8] 28/25
123/4	we've [8] 41/11	35/16 44/6 45/5
wards [54]	48/14 49/14 49/15	56/17 73/8 75/9
wards' [1] 112/3	108/8 109/6	88/21
warrant [1] 103/5	110/10 124/3	whatever [8]
warranted [1]	weapon [1] 6/18	27/25 31/8 31/13
118/11	Weber [9] 104/5	33/16 36/2 62/7
warrants [1]	104/5 105/5 105/9	62/16 72/2
86/24	105/10 105/13	when [49]
was [167]	105/17 105/24	where [57]
wasn't [3] 42/1	116/24	wherever [2]
42/10 94/23	Weber's [2]	32/19 55/10
way [11] 13/1	105/21 106/5	whether [10] 8/9
17/25 18/3 47/4	website [1] 92/4	11/22 25/6 27/23
47/13 59/6 65/5	websites [1]	48/23 54/10 62/22
73/9 74/7 81/23	28/15	98/10 102/4 108/3
116/20	week [5] 57/14	which [25] 6/10
ways [1] 94/21	87/6 87/19 106/3	7/10 9/9 9/25
we [125]	124/4	10/17 10/17 11/7
we'd [2] 72/16	weeks [1] 67/18	11/20 13/25 14/10
75/24	well [23] 7/17	14/14 30/22 30/22
we'll [27] 18/22	7/18 17/16 27/5	31/23 40/22 42/1
22/15 32/16 32/18	41/23 45/7 70/21	50/1 55/18 82/10
33/18 33/19 33/22	82/23 84/7 84/22	83/21 96/8 105/11
33/24 34/7 45/14	87/6 87/9 87/12	105/21 110/5
48/15 53/2 55/18	91/18 94/18 94/22	118/15
58/3 58/8 58/9	95/20 100/2	whichever [1]
71/5 71/6 77/2	108/11 110/12	33/22
77/2 77/6 87/4	114/7 115/13	while [4] 86/12
88/22 92/21	116/1	96/19 106/1 110/6
117/12 124/4	well-being [1]	who [68]
124/5	115/13	who's [4] 20/16
we're [28] 5/12	Wells [1] 111/11	23/25 26/14 32/8
5/14 30/22 31/14	went [9] 80/18	whole [6] 15/3
32/14 32/16 48/6	85/21 85/24 97/9	16/3 56/8 70/11
48/8 55/15 55/21	97/18 109/4 113/8	78/24 79/17
56/9 56/9 56/11	114/21 120/19	Whom [1] 92/14
56/13 56/16 58/11	were [56]	whomever [1]

W	32/13 32/24 34/10	113/17 114/25
whomever... [1]	40/2 40/8 41/9	115/2 118/17
33/13	42/3 48/24 49/25	118/18 121/3
whose [1] 11/12	50/8 50/13 50/16	121/14 122/18
why [16] 17/6	55/17 57/2 57/9	worked [5] 85/14
31/25 35/6 35/6	58/6 111/11	86/2 94/5 113/15
37/7 42/18 52/4	without [6] 10/1	120/18
59/4 59/9 89/18	10/5 19/11 36/8	worker [1] 42/6
102/9 116/11	39/7 110/6	working [6] 82/22
116/14 119/13	witness [2] 14/17	86/1 86/6 96/3
121/7 123/4	78/18	98/8 120/12
wide [1] 59/24	witnesses [5] 3/1	works [1] 5/11
will [46]	5/18 91/12 116/18	worth [8] 23/16
willful [1] 14/7	124/1	24/7 25/9 50/12
Willfully [1]	WOJNAROWSKI [1]	51/23 96/20
14/9	2/16	114/25 115/2
William [2]	woman [1] 105/10	would [91]
107/12 107/16	won't [1] 74/4	wouldn't [2]
willing [4] 32/8	WONG [1] 2/17	29/14 119/8
65/12 65/14 65/23	Woods [20] 100/13	wounds [1] 56/15
WILSON [1] 2/15	100/18 100/20	wrap [1] 44/9
wind [2] 108/19	100/20 100/24	wrapped [1] 72/14
120/7	101/2 101/9	wrapping [1] 44/6
winding [1]	101/11 101/14	write [1] 36/5
108/25	101/15 101/21	writes [1] 45/9
wise [1] 67/9	102/11 102/19	writing [3] 48/2
wit [1] 126/13	103/12 103/16	103/14 110/19
withdraw [2]	103/22 104/9	written [9] 11/6
47/22 48/16	104/15 104/22	28/24 47/7 47/12
withdrew [1]	116/24	75/22 81/3 92/18
107/24	Woods' [1] 103/6	105/2 119/18
withholding [1]	word [1] 53/25	wrong [1] 39/8
6/23	words [2] 104/16	wrongful [1]
within [39] 8/3	108/7	10/18
16/21 20/24 23/14	work [27] 5/10	wrote [2] 101/23
24/5 24/14 24/21	20/19 29/23 29/25	101/23
25/4 25/16 25/18	30/4 46/16 54/19	
26/10 26/18 27/8	55/2 56/24 64/13	Y
27/15 27/19 29/24	65/15 65/20 68/4	yeah [13] 18/10
30/14 30/15 30/25	70/21 71/13 73/12	18/21 20/2 20/8
31/1 31/5 32/3	86/4 93/3 100/4	28/13 39/5 40/14

Y

19/22

yeah... [6] 47/15

74/17 84/23

104/11 118/20

122/16

year [17] 20/24

25/2 25/5 25/21

30/12 30/13 30/13

30/21 40/14 41/9

42/3 69/8 69/11

69/13 73/19 73/22

106/4

years [16] 8/3

13/7 13/9 19/8

19/23 19/24 24/23

24/24 25/1 45/9

45/22 45/24 80/6

84/4 112/11

121/22

yes [76]**yet** [3] 76/10

76/11 76/14

you [370]**you'd** [7] 24/25

37/2 49/9 49/10

52/1 58/12 71/22

you'll [17] 21/20

21/21 23/15 23/15

26/7 26/10 27/3

27/5 32/19 37/7

38/6 38/8 38/22

38/23 39/3 59/25

121/13

you're [60]**you've** [11] 18/15

18/20 19/22 25/2

27/22 46/16 52/8

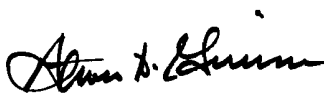
59/1 89/5 94/24

117/10

your [51]**yourself** [2] 19/6

12:00 1
2
3
4
12:00 5
6
7
8
9
12:00 10
11
12
13
14
12:00 15
16
17
18
19
12:00 20
21
22
23
24
12:00 25

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
03/13/2017 01:02:46 PM

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.)
=====)

Taken at Las Vegas, Nevada
Tuesday, February 21, 2017
1:20 p.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

VOLUME 7-A

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

12:00 1 GRAND JURORS PRESENT ON FEBRUARY 21, 2017

2

3 PAUL MORTALONI, Foreperson

4 WAYNE CLEVELAND, Deputy Foreperson

12:00 5 MARY ANN GOTHARD, Secretary

6 SHERRY LAYNE, Assistant Secretary

7 DAVID BAX

8 ARTHUR BYRD

9 ELLEN COOK

12:00 10 NORMA MARTIN

11 MELVINA MISSOURI-DONOVAN

12 ADRIENNE ODOGHOUE

13 JOHN ORESCHAK

14 BERTHA PENDLETON

12:00 15 MARRENA POUNCY

16 MICHAEL TALKINGTON

17 GERALDINE WOJNAROWSKI

18 LAWRENCE WONG

19

12:00 20 Also present at the request of the Grand Jury:

21 Jay P. Raman, Chief Deputy District Attorney

22 Daniel Westmeyer, Senior Deputy Attorney General

23

24

25

12:00

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

INDEX OF WITNESSESExamined

ANGELICA SANCHEZ

6

12:00	1	<u>INDEX OF EXHIBITS</u>	
	2		
	3	<u>Grand Jury Exhibits</u>	<u>Identified</u>
	4	3 - DIGITAL ARCHIVE	25
12:00	5	5 - PHOTOGRAPH	9
	6	6 - PHOTOGRAPH	29
	7	7 - PHOTOGRAPH	9
	8	AW 10 - BANK STATEMENT WITH HANDWRIITEN NOTES	23
	9	OR MAIN 18 - EMAILS RE: SOCIAL SECURITY BILLING	27
12:00	10	SSA 31 - PRINTOUT FROM SEM	26
	11		
	12		
	13		
	14		
	15		
	16		
	17		
	18		
	19		
	20		
	21		
	22		
	23		
	24		
	25		

12:00 1 LAS VEGAS, NEVADA, FEBRUARY 21, 2017

2 * * * * *

3

4 DANETTE L. ANTONACCI,

12:00 5 having been first duly sworn to faithfully

6 and accurately transcribe the following

7 proceedings to the best of her ability.

8

9 MR. WESTMEYER: Good afternoon ladies and

01:20 10 gentlemen. We are back on case 16AGJ151A-C. State's

11 next witness is Angelica Sanchez.

12 THE FOREPERSON: Please raise your right

13 hand.

14 You do solemnly swear the testimony you are

01:22 15 about to give upon the investigation now pending before

16 this Grand Jury shall be the truth, the whole truth, and

17 nothing but the truth, so help you God?

18 THE WITNESS: Yes.

19 THE FOREPERSON: Please be seated.

01:22 20 You are advised that you are here today to

21 give testimony in the investigation pertaining to the

22 offenses of racketeering, theft, exploitation of older

23 person, offering false instrument for filing or record,

24 and perjury, involving April Parks, Mark Simmons and

01:22 25 Gary Taylor.

01:22 1 Do you understand this advisement?

2 THE WITNESS: Yes.

3 THE FOREPERSON: Please state your first
4 and last name and spell both for the record.

01:22 5 THE WITNESS: Angelica Sanchez.

6 A-N-G-E-L-I-C-A, last name is S-A-N-C-H-E-Z.

7 ANGELICA SANCHEZ,

8 having been first duly sworn by the Foreperson of the
9 Grand Jury to testify to the truth, the whole truth,

01:22 10 and nothing but the truth, testified as follows:

11

12 EXAMINATION

13

14 BY MR. WESTMEYER:

01:22 15 Q. Good afternoon, Miss Sanchez. Can you lean
16 just a little bit closer to the mic. I want to make
17 sure everybody can hear you.

18 A. Sure.

19 Q. Thank you.

01:22 20 A. Is it okay if I slide it towards me?

21 Q. Sure.

22 A. How about there? Is that better? Can
23 everyone hear me?

24 Q. Miss Sanchez, are you familiar with a

01:23 25 company named A Private Professional Guardian?

01:23 1 A. Yes.

2 Q. How are you familiar with that company?

3 A. I worked for them.

4 Q. What time period did you work for them?

01:23 5 A. 2011, 2012 and I believe it was just the
6 first two months of 2013.

7 Q. Okay. So about a year and a half,
8 something like that?

9 A. Correct, yeah, roughly around there.

01:23 10 Q. Okay. Who else was employed by A Private
11 Professional Guardian?

12 A. When I first hired on it was April Parks,
13 Mark Simmons, myself and April's husband at the time was
14 assisting us, Devon, was assisting us with projects,
01:23 15 house checks.

16 Q. How did you come to know April?

17 A. I met April when I was working at an
18 assisted living facility here in town. I had just moved
19 here from Reno. I was running, I was the marketing
01:24 20 director for Aegis Assisted Living. I would have
21 luncheons once a month and I met April through one of
22 the luncheons. I had invited her to come in and take a
23 look at the community and we just became friends after
24 that.

01:24 25 Q. Okay. And at some point she hired you to

01:24 1 work for her company as well?

2 A. Correct. We both, I ended up becoming
3 employed with Lee Drizin's office and April was an
4 employee of his at the time and when she transitioned

01:24 5 out of Lee Drizin's office she brought me on to her,
6 when she opened up her own practice.

7 Q. Do you know when roughly that was?

8 A. I believe it was 2011.

9 Q. Okay. So you mentioned some of the
01:24 10 employees that worked there. Would you kind of break it
11 down for us what the duties were of each of the people
12 that was working at A Private Professional Guardian?

13 A. April was our legal guardian. Mark was an
14 office assistant or like an office manager.

01:25 15 Q. When you say Mark, who do you mean?

16 A. Mark Simmons. And I did, I assisted with
17 placement coordination into the group homes, assisted
18 livings, and then I did ward visits and managed a lot of
19 the wards' daily interactions.

01:25 20 Q. Okay. I want to ask you about those, but
21 before I do I want to show you what's previously been
22 marked as Exhibits 5 and 7. I'm going to put these up
23 on the Elmo so the members of the Grand Jury can see.

24 It's going to come up on the screen right here to your

01:25 25 left.

01:25 1 Is that April?

2 A. That is April.

3 Q. And for the record I'm showing you Grand

4 Jury Exhibit Number 5. This is the woman you know as

01:25 5 April Parks?

6 A. Correct.

7 Q. And showing you now Grand Jury Exhibit

8 Number 7. Do you recognize this man?

9 A. That's Mark Simmons.

01:26 10 Q. Okay. And he was one of the people that

11 also worked at A Private Professional Guardian?

12 A. Correct.

13 Q. Tell us more about what April's role was.

14 A. April would, when I initially started with

01:26 15 April she would do the interaction with the attorneys,

16 going to court, working with the families on the

17 beginning of a case if there were families involved.

18 She would give direction to Mark and I as to how we

19 would handle cases when they would come through or when

01:26 20 we would get appointed or when she would get appointed

21 as the guardian.

22 Q. What was Mark's role?

23 A. Mark was like air traffic control. Mark

24 was predominantly in the office. He handled majority of

01:26 25 the phone calls coming through. He would help maintain

01:26 1 files, he would manage the billing, he would stay on top
2 of the banking. He would give me direction when wards
3 needed items or if I needed to take them to a doctor's
4 appointment, so he would provide direction to me as
01:27 5 well, and then he would also do ward visits in addition
6 to myself and April.

7 Q. Okay.

8 A. And marketing. We'd go marketing,
9 sometimes we'd go marketing together to generate new
01:27 10 cases.

11 Q. Was there any type of training process when
12 you came on?

13 A. Not a formalized training, no, it was
14 direction given as I would progress working there.

01:27 15 Q. Okay. How was the billing conducted?

16 A. When I initially started our billing was
17 done by us tracking our time either in a notebook or,
18 you know, in a Word document and I would email that over
19 to Mark once a month and Mark would handle it from
01:27 20 there. I don't know what format he would put it in to
21 bill the client. But eventually we went from a notebook
22 and a Word document style to a system that allowed us to
23 enter in our billable time.

24 Q. Do you remember what the name of that
01:28 25 system was?

01:28 1 A. No. I know it starts with an S.

2 Q. Okay. If I told you it was SEM, does that

3 sound correct?

4 A. That's correct, yes.

01:28 5 Q. Do you remember when it was that you moved

6 to the SEM system?

7 A. I don't recall when we officially made the

8 transition.

9 Q. But it was sometime while you were working

01:28 10 for --

11 A. It was while I was working for them,

12 correct.

13 Q. Okay. And in that system, can you tell us

14 just briefly how that system works and how it differs

01:28 15 from the previous billing system?

16 A. Well, with this billing system we had our

17 own passwords and log-ins. We did do a training with

18 the company to learn how to enter in our billable hours.

19 Mark and April structured it to where we would enter in

01:28 20 a line item and we could just put in the number of

21 minutes that an event occurred and then it would

22 calculate the amount that the ward would get billed.

23 And so we would just enter in our time through there

24 each month instead of sending it in a Word document or

01:29 25 giving Mark sheets of paper to track our time.

01:29 1 Q. What sorts of billing increments were you
2 instructed to put in the system?

3 A. So we billed in increments, at that time in
4 ten minute increments.

01:29 5 Q. Who instructed you to do that?

6 A. Mark and April both.

7 Q. And what if some activity took less than
8 ten minutes to do, what were you supposed to do?

9 A. We still billed at the ten minutes.

01:29 10 Q. And if something took say 11 minutes, did
11 it get billed up to 20 or did it get rounded down to
12 ten; how did that work?

13 A. I'm not sure how that would work.

14 Q. Okay. So you mentioned some of the things
01:30 15 that you had to do. Did you have an official title?

16 A. April referred to me as like a placement
17 coordinator. At times she would refer to me as a
18 marketing director for her. My roles varied. Sometimes
19 I was in the community marketing, building relationships
01:30 20 to generate more client leads whether that was with the
21 hospital or an attorney's office, and there were times
22 that I would be coordinating placement of the wards into
23 housing such as a group home or assisted living. I
24 didn't really have an official title, no.

01:30 25 Q. I think you mentioned some of your duties

01:30 1 included things like ward visits and that sort of thing.
2 Would you tell us about that?

3 A. Correct. So I would visit the wards,
4 initially the goal was for me to visit them monthly and
01:31 5 during that time I would --

6 Q. I'm sorry to interrupt. When you say the
7 goal was to visit them monthly --

8 A. Correct.

9 Q. -- how did you get that goal?

01:31 10 A. So April and Mark laid out that expectation
11 for me.

12 Q. So you were expected to, when you first
13 started, visit with each ward at least once a month?

14 A. Correct.

01:31 15 Q. I'm sorry, I interrupted you. Please
16 continue.

17 A. That's fine. During that ward visit, it
18 may be sorts of different things. Sometimes I would be
19 checking their closets, checking with the group

01:31 20 homeowners or the assisted living personnel to see how
21 the ward was adjusting, I would be lying eyes on the
22 ward themselves, checking on their physical well-being
23 and of course their social well-being.

24 Q. Okay.

01:31 25 A. At times I would shop for them, take them

01:31 1 to doctors' appointments.

2 Q. Let me ask you first about the ward visits.

3 I do want to talk about the shopping and the doctors'

4 appointments and that sort of thing as well but before

01:31 5 we get to that. When you would do one of these ward

6 visits, was it usually one on one with the ward or would

7 there been more than one ward you would see at the same

8 facility?

9 A. So there may have been multiple wards

01:32 10 within the same facility but I saw them individually.

11 And if they were in group settings I would sometimes

12 participate in the group setting and be able to pull one

13 away. And it also depended on their level of capacity

14 as well as to whether or not I pulled them away and

01:32 15 engaged them independently of the group.

16 Q. But there would be, it would be frequent,

17 would it not, that you would go to a particular facility

18 and there would be more than one ward that you would lay

19 eyes on?

01:32 20 A. Correct.

21 Q. When you did that, did you have

22 instructions on how you were supposed to bill for those

23 visits?

24 A. Yes, I received direction from Mark and

01:32 25 April on the billing and when I would see a ward, there

01:32 1 was multiple wards, I billed them all the same for my
2 travel time, whatever that was, they all got billed the
3 same travel time and then I would bill them for the
4 amount of minutes I was working with them individually,
01:33 5 whether it was the social aspect of talking to the ward
6 and seeing how they were doing or checking the
7 medications or interacting with the personnel.

8 Q. Okay. So let's say there's a particular
9 day where it takes you an hour total travel time and
01:33 10 you're at the facility for a total of one hour, so two
11 hours total. If you saw say five wards, would they each
12 be billed the two hours?

13 A. Correct, they would be billed the two
14 hours.

01:33 15 Q. So it wasn't broken up by --

16 A. It wasn't divided up, no.

17 Q. It wasn't divided up. Okay.

18 And again who told you to bill that way?

19 A. I received direction on my billing from
01:33 20 both Mark and April.

21 Q. Did Mark ever have any discussions with you
22 about how much you were billing?

23 A. Not in regards to the time or the duration.
24 He asked me to make sure that I billed everything that I
01:34 25 did. He would correct me on my billing because I am one

01:34 1 of the worse spellers possible and so if something in my
2 notes wasn't correct Mark would provide me direction as
3 to making sure I was paying better attention to my
4 notes, but that would be about it.

01:34 5 Q. Now I want to ask you about Golden Name
6 Solutions. Are you familiar with that?

7 A. Golden Age Solutions.

8 Q. Golden Age Solutions. I'm sorry.

9 A. Yes.

01:34 10 Q. What is that?

11 A. So Golden Age Solutions was the corporation
12 that I had established for myself while I was working
13 for April.

14 Q. So if something is billed out to Golden Age
01:34 15 Solutions, that just means you?

16 A. That just means me, correct, because April
17 did not have a formalized payroll system so I consulted
18 with an attorney as to how I should manage the pay and
19 that was the direction I was given was to deposit into
01:35 20 those accounts.

21 Q. So you got paid from Golden Age Solutions?

22 A. To myself. Right, April would write a
23 check. Initially the checks would be written by Mark to
24 me and then once I had become incorporated, then we
01:35 25 wrote the checks out to Golden Age Solutions.

01:35 1 Q. You mentioned shopping trips. Can you tell
2 us about those? What were those for and what would you
3 do?

4 A. So I would go shopping for the wards and I
01:35 5 would pick up their personal supply items, Depends,
6 shampoo, personal clothing, if they needed socks or
7 toiletry items, shoes. It would just depend on what the
8 ward's needs were at the time. Some of our group homes
9 in the assisted living facilities would send in forms.
01:36 10 We did create a form, a shopping list form that they
11 could check off what the ward's needs were, they'd get
12 those into Mark, Mark would then give them to me and I
13 would go out and shop and deliver the items that I
14 shopped for.

01:36 15 Q. Okay. So again I want to discuss sort of
16 an example. So if say there's five wards that need
17 toiletries or whatever it is, your job would be to go to
18 Sam's Club or Walmart, whatever it was, and shop for all
19 of those five wards; is that right?

01:36 20 A. That's correct.

21 Q. And again can you tell us how that was
22 billed to those wards?

23 A. It was billed in the manner that I would go
24 for the duration of the time. So for an example, if I
01:36 25 went to Sam's Club, I frequented Sam's Club quite a bit,

01:36 1 if I was there for an hour and I was shopping for
2 multiple wards, every ward would get the same amount of
3 time billed that I was there. So if I was there for an
4 hour, all of them would get that same hour billing.

01:37 5 Q. Okay. So if you went to Sam's Club to get
6 toiletries, whatever the ward needed, you were gone for
7 one hour for ten different wards, there would be ten
8 hours worth of billing?

9 A. Correct.

01:37 10 Q. And who told you to bill that way?

11 A. I was instructed to bill that way from Mark
12 and April.

13 Q. Do you know whether any of those facilities
14 would perform that same service?

01:37 15 A. I know some would. Some did not. But some
16 of the facilities would provide basic toiletry items for
17 the wards. Some of them did provide the Depends and the
18 gloves for private incontinent care.

19 Q. But these are the same items that you were
01:37 20 instructed to go out and purchase and then bill for your
21 time?

22 A. Correct.

23 Q. How are you employed right now?

24 A. So right now I work for a company that
01:38 25 works home care. I do client coordination for a home

01:38 1 care company so I help clients when they come through
2 the door explaining what their home care options would
3 be.

4 Q. Are you a certified guardian yourself right
01:38 5 now?

6 A. I am currently a certified guardian through
7 the end of this month.

8 Q. Now at the time period we've been
9 discussing when you were working for this company, A
01:38 10 Private Professional Guardian, were you at that time a
11 certified guardian?

12 A. I was not a certified guardian while I was
13 working for April.

14 Q. And is there anything that you've learned
01:38 15 since becoming a certified guardian that made you think
16 about what you were doing while you were, before that
17 while you were working for A Private Professional
18 Guardian?

19 A. Yes.

01:39 20 Q. Can you elaborate please?

21 A. Some of the direction that I received in
22 the capacities that I filled, in the roles such as the
23 care giving roles, may not have always been the best use
24 of my time or the ward's estate and some of those tasks
01:39 25 could have been done by a home care agency themselves at

01:39 1 a lower billable rate.

2 Q. Okay. What are these home care agencies?
3 What does that mean?

4 A. So a home care agency would provide, like a
01:39 5 personal care attendant, somebody to come in and help
6 with maybe light housekeeping, showering, bathing
7 toileting, escorts, you know, transportation to and from
8 a doctor's appointment. That is the primary role of
9 caregivers coming through. And a lot of those times
01:39 10 that was my role within the direction I received from
11 Mark and April.

12 Q. And do you know at what rate your services
13 were being billed while you were employed at A Private
14 Professional Guardian?

01:40 15 A. When I started with April I was expressed
16 that the rate was 135 an hour. What it increased to or
17 differed from there I don't know.

18 Q. But contrasting that with what you just
19 referenced, the personal care assistant, do you know
01:40 20 what the average market cost for someone like that is?

21 A. For a caregiver the average is going to be
22 in the Las Vegas market probably \$19 an hour to 25 an
23 hour.

24 Q. Okay. So significantly less than what your
01:40 25 services were being billed for?

01:40 1 A. Yes.

2 Q. And that was essentially the same work
3 though?

4 A. Yes.

01:40 5 Q. Okay. So now that you're a certified
6 guardian yourself, correct me if I'm wrong, but is it
7 safe to say you recognize that some of these things that
8 you were being asked to do at the time, you wouldn't do
9 as a guardian yourself?

01:41 10 A. Correct.

11 Q. And is that because it's not in the
12 interest of the ward?

13 A. Yeah, it's not in the interest of the
14 ward's estate to preserve those assets.

01:41 15 Q. I'd like to ask you about a couple of
16 specific wards and see if you remember them. Do you
17 remember a ward by the name of Audrey Weber?

18 A. I do.

19 Q. Okay. Is there a reason why that
01:41 20 particular ward sticks out?

21 A. Audrey's condition, she was nonresponsive.

22 Q. What does that mean, nonresponsive?

23 A. So when I would go and do like a ward visit
24 with her, she was not communicative, she wasn't able to
01:41 25 respond to me. If I were to say hi Audrey, how are you

01:41 1 doing today, there was no communication coming back to
2 me and she lived at a nursing home.

3 Q. Was she on some sort of life support?

4 A. I believe she was on a respirator.

01:42 5 Q. Okay. Do you know how often you went to
6 visit Audrey Weber?

7 A. I don't recall the number of times that I
8 visited her but I did see her, I did see her, the nurses
9 that were on Audrey's case at the nursing home.

01:42 10 Q. Would you say it was more than once a
11 month?

12 A. At times. I would have to see the billing
13 statement though. I don't recall because it was such a
14 long time ago. I don't remember the frequency of the
01:42 15 trips but I did see her. I don't remember how many
16 times or even how many times per month.

17 Q. Okay. Miss Sanchez, in front of you
18 there's a screen there and it's got a page pulled up and
19 you can kind of manipulate that, kind of like the touch
01:43 20 screen on your phone. On the page that's pulled up
21 there, for the members of the Grand Jury it should be
22 Exhibit 3 and then sub-exhibit AW 10. And for reference
23 the bates number is 10596. Do you see that page?

24 A. I do.

01:43 25 Q. Can you tell us what that is?

01:43 1 A. This appears to be a bank statement from
2 the guardianship account of Audrey Weber.
3 Q. And are there handwritten notes on there?
4 A. There are handwritten notes.
01:43 5 Q. Do you recognize the handwriting that's
6 depicted there?
7 A. It is Mark Simmons' handwriting.
8 Q. You're familiar with his handwriting?
9 A. I am familiar with his handwriting.
01:43 10 Q. Is that from working with him?
11 A. From working with him and his penmanship is
12 very well.
13 Q. Can you tell what these numbers represent?
14 A. It appears to me as though they are,
01:44 15 there's dates on the left hand side. On the right hand
16 side it looks like it is a balance ledger, deductions of
17 what might look like fees. Some additions and
18 subtractions.
19 Q. Okay. Do you recall seeing Mark make these
01:44 20 notes or fill it out or anything?
21 A. I do not recall him making these notes, no.
22 Q. Do you recall telling investigators that
23 Mark told you he was trying to figure out how to zero
24 out the account?
01:44 25 A. I told investigators that Mark had stated

01:44 1 to me that there was funds left over in Audrey's account
2 after she had passed and he asked me to bill delivery of
3 flowers to her gravesite because there were funds
4 remaining in her account.

01:45 5 Q. How did you feel about that?

6 A. I did what I was asked to do. In the
7 moment I had no reason to question if he would do it or
8 not. Looking back now sitting here it's a different
9 situation.

01:45 10 Q. After Audrey Weber had passed and after
11 Mark had asked you to put flowers on her grave, did you
12 in fact do that?

13 A. I did not perform those duties that I was
14 asked to bill, no.

01:45 15 Q. Do you know whether anyone performed that
16 duty at some point?

17 A. I am not aware if they did or did not.

18 Q. I want to switch gears for just a minute.

19 As part of your employment for A Private Professional

01:46 20 Guardian, did you ever have to deal with the Social
21 Security Administration?

22 A. My scope was filling out representative
23 payee forms, but that was it.

24 Q. How long did it take to fill out those

01:46 25 forms?

01:46 1 A. Maybe 15, 20 minutes. Not long.

2 Q. Less than an hour?

3 A. Yes.

4 Q. Okay. So if there was an SEM record that

01:46 5 showed you filling out these forms and it took an hour

6 for each form, would that be accurate to your knowledge?

7 A. No.

8 Q. Now again I'd like to draw your attention

9 to Exhibit 3 in front of you, the electronic archive

01:46 10 there. On the left side there's some bookmarks where

11 you can scroll up and down. If you actually scroll

12 down.

13 A. Oh, down.

14 Q. Yes. So we're in the ones that say AW and

01:46 15 I think there is one that should say SSA.

16 A. What was the last?

17 Q. I think it's below that one. Keep

18 scrolling down a bit.

19 A. Do I continue to scroll down?

01:47 20 Q. Yeah. We'll help you find it.

21 A. Thank you.

22 Q. It looks like you've got the page there.

23 And I think it's the first one. You should be able to

24 rotate that screen so the members of the Grand Jury can

01:47 25 see it a little bit better.

01:48 1 A. Thank you.

2 Q. There you go. Thank you.

3 Now do you recognize what's depicted here?

4 This is SSA Exhibit 31.

01:48 5 A. So this is a printout from the billing
6 system that we were utilizing.

7 Q. Okay. This is the SEM system?

8 A. Correct.

9 Q. What's depicted here?

01:48 10 A. It's showing the wards that were billed for
11 a meeting at Social Security.

12 Q. On what date?

13 A. The date was 5/31/2012. And they were
14 billed out an hour at 120 an hour by myself.

01:49 15 Q. Okay. Do you recall being at Social
16 Security for six hours on May 31, 2012?

17 A. No, I was not at Social Security.

18 Q. Okay. Have you ever had to meet for six
19 hours with Social Security for any reason?

01:49 20 A. It's a wait but never for that long.

21 Q. Do you recall who asked you to bill for
22 that?

23 A. The direction would have come from April to
24 Mark or Mark to myself.

01:49 25 Q. There's another exhibit I'd like to draw

01:49 1 your attention to.

2 A. Thank you.

3 MR. RAMAN: No problem.

4 BY MR. WESTMEYER:

01:50 5 Q. And for the record what we're looking at is
6 Exhibit 3. It's Main OR Exhibit 18. Which I believe
7 starts at bates number 549.

8 MR. RAMAN: Thirteen?

9 MR. WESTMEYER: Eighteen.

01:50 10 MR. RAMAN: Eighteen.

11 MR. WESTMEYER: There we go.

12 Q. Miss Sanchez, can you look through the
13 first two pages that are depicted there and let me know
14 if you recognize them.

01:51 15 A. This is an email from April to Mark asking
16 her to bill for her billable hours at Social Security
17 that she had meetings with.

18 Q. Okay. And can you scroll over to the
19 bottom right portion of that page?

01:51 20 A. This is my handwriting with those notes.
21 And then the bottom right hand corner? Somehow --

22 Q. I think you skipped ahead of it.

23 A. Technology is not on my side today. Where
24 did it go?

01:52 25 There it goes. Okay.

01:52 1 Q. There we go.

2 A. So the bottom right hand corner has my

3 check mark and my initials.

4 Q. What's that? What's beneath the check mark

01:52 5 and your initials?

6 A. The number 8 with a little hour sign so.

7 Q. What does that mean?

8 A. So what that meant was I was taking and

9 billing April's hours that I had been given that day to

01:52 10 bill by Mark.

11 Q. And same thing on the next page?

12 A. Yes. This is another email from April to

13 Mark asking her to bill her billable hours out. That is

14 my handwriting in the note section and it is my check

01:52 15 mark and my initials on the bottom right hand side.

16 Q. Is there a number below that as well?

17 A. There is, 10.5.

18 Q. And similar to the previous one, does that

19 indicate April was billing ten and a half hours?

01:53 20 A. That would make sense, that's correct, yes.

21 Q. And same thing on the next page?

22 A. Here we have another email from April to

23 Mark directing him to bill her billable hours which I

24 billed upon being given these. And another one.

01:53 25 Q. Okay. Was this before the SEM system was

01:53 1 installed or whatever, made available to you?

2 A. I don't recall what the date was that we
3 transitioned to the billing system.

4 Q. Okay. So with all that in mind, there's a
01:54 5 couple other things I kind of wanted to ask you about.

6 A. Sure.

7 Q. So you said when you first, you kind of
8 told us who was working there and what their roles were
9 when you first started. Did anybody else come to work
01:54 10 for A Private Professional Guardian while you were
11 employed there?

12 A. April's son would help us on occasion,
13 Tommy. And eventually as, towards the end when I was
14 leaving she brought on Neil Taylor to work as well.

01:54 15 Q. And I want to show you a picture of him.
16 I'm going to approach just like I did with the others.
17 I'm going to show you Grand Jury Exhibit Number 6. Is
18 this Mr. Taylor?

19 A. Yes, that is.

01:54 20 Q. Thank you. What was Mr. Taylor's role?

21 A. I wasn't clear on what his role was. I
22 wasn't informed that Mr. Taylor was even working for us
23 until I went to a facility and saw that he had signed in
24 on a sign-in log. And Mark had expressed to me that
01:55 25 Neil was going to be assisting with house checks and

01:55 1 ward visits.

2 MR. WESTMEYER: Okay. Ladies and
3 gentlemen, I, thin we need to take a break at this point
4 so we'll return in just a few minutes. We'll take five
01:55 5 minutes.

6 (Recess.)

7 --oo0oo--

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

REPORTER'S CERTIFICATE

STATE OF NEVADA)
 : ss
COUNTY OF CLARK)

I, Danette L. Antonacci, C.C.R. 222, do
hereby certify that I took down in Shorthand (Stenotype)
all of the proceedings had in the before-entitled matter
at the time and place indicated and thereafter said
shorthand notes were transcribed at and under my
direction and supervision and that the foregoing
transcript constitutes a full, true, and accurate record
of the proceedings had.

Dated at Las Vegas, Nevada,
February 27, 2017.

/s/ Danette L. Antonacci

Danette L. Antonacci, C.C.R. 222

01:55

1

AFFIRMATION

2

Pursuant to NRS 239B.030

3

4

The undersigned does hereby affirm that the
preceding TRANSCRIPT filed in GRAND JURY CASE NUMBER
16AGJ151A-C:

01:55

5

6

7

8

X Does not contain the social security number of any
person,

9

01:55

10

-OR-

11

___ Contains the social security number of a person as
required by:

12

13

A. A specific state or federal law, to-
wit: NRS 656.250.

14

-OR-

01:55

15

16

B. For the administration of a public program
or for an application for a federal or
state grant.

17

18

/s/ Danette L. Antonacci

19

Signature

2-27-16

Date

01:55

20

21

Danette L. Antonacci
Print Name

22

23

Official Court Reporter
Title

24

25

	20 [2] 12/11 25/1	5/6
BY MR. WESTMEYER:	2011 [2] 7/5 8/8	activity [1] 12/7
[2] 6/12 27/3	2012 [3] 7/5	actually [1]
MR. RAMAN: [3]	26/13 26/16	25/11
27/2 27/7 27/9	2013 [1] 7/6	addition [1] 10/5
MR. WESTMEYER:	2017 [4] 1/14 2/1	additions [1]
[4] 5/7 27/8	5/1 31/15	23/17
27/10 30/1	21 [3] 1/14 2/1	adjusting [1]
THE FOREPERSON:	5/1	13/21
[3] 5/11 5/18	222 [3] 1/25 31/6	administration [2]
6/2	31/18	24/21 32/15
THE WITNESS: [3]	239B.030 [1] 32/2	ADRIENNE [1] 2/12
5/17 6/1 6/4	25 [1] 20/22	advised [1] 5/20
	27 [1] 31/15	advisement [1]
\$		6/1
\$19 [1] 20/22	3	Aegis [1] 7/20
—	31 [2] 26/4 26/16	affirm [1] 32/4
--oo0oo [1] 30/7	5	AFFIRMATION [1]
-OR [2] 32/10	5/31/2012 [1]	32/1
32/14	26/13	after [4] 7/23
/	549 [1] 27/7	24/2 24/10 24/10
/s [2] 31/17	6	afternoon [2] 5/9
32/18	656.250 [1] 32/13	6/15
1	7	again [4] 15/18
10 [1] 22/22	7-A [1] 1/21	17/15 17/21 25/8
10.5 [1] 28/17	A	Age [6] 16/7 16/8
10596 [1] 22/23	A-N-G-E-L-I-C-A	16/11 16/14 16/21
11 [1] 12/10	[1] 6/6	16/25
120 [1] 26/14	ability [1] 5/7	agencies [1] 20/2
135 [1] 20/16	able [3] 14/12	agency [2] 19/25
15 [1] 25/1	21/24 25/23	20/4
16 [1] 32/18	about [16]	ago [1] 22/14
16AGJ151A-C [3]	account [4] 23/2	ahead [1] 27/22
1/7 5/10 32/5	23/24 24/1 24/4	air [1] 9/23
18 [1] 27/6	accounts [1]	all [6] 15/1 15/2
1:20 [1] 1/15	16/20	17/18 18/4 29/4
2	accurate [2] 25/6	31/8
2-27-16 [1] 32/18	31/12	allowed [1] 10/22
	accurately [1]	also [4] 2/20
		9/11 10/5 14/13
		always [1] 19/23

A	as [24]	B
am [4] 15/25 19/6 23/9 24/17 amount [3] 11/22 15/4 18/2 Angelica [3] 5/11 6/5 6/7 ANN [1] 2/5 another [4] 26/25 28/12 28/22 28/24 Antonacci [7] 1/25 5/4 31/6 31/17 31/18 32/18 32/21 any [5] 10/11 15/21 18/13 26/19 32/8 anybody [1] 29/9 anyone [1] 24/15 anything [2] 19/14 23/20 appears [2] 23/1 23/14 application [1] 32/15 appointed [2] 9/20 9/20 appointment [2] 10/4 20/8 appointments [2] 14/1 14/4 approach [1] 29/16 APRIL [32] April's [4] 7/13 9/13 28/9 29/12 archive [2] 4/4 25/9 are [16] around [1] 7/9 ARTHUR [1] 2/8	ask [5] 8/20 14/2 16/5 21/15 29/5 asked [7] 15/24 21/8 24/2 24/6 24/11 24/14 26/21 asking [2] 27/15 28/13 aspect [1] 15/5 assets [1] 21/14 assistant [3] 2/6 8/14 20/19 assisted [7] 7/18 7/20 8/16 8/17 12/23 13/20 17/9 assisting [3] 7/14 7/14 29/25 attendant [1] 20/5 attention [3] 16/3 25/8 27/1 attorney [3] 2/21 2/22 16/18 attorney's [1] 12/21 attorneys [1] 9/15 Audrey [5] 21/17 21/25 22/6 23/2 24/10 Audrey's [3] 21/21 22/9 24/1 available [1] 29/1 average [2] 20/20 20/21 AW [2] 22/22 25/14 aware [1] 24/17 away [2] 14/13 14/14	back [3] 5/10 22/1 24/8 balance [1] 23/16 bank [2] 4/8 23/1 banking [1] 10/2 basic [1] 18/16 bates [2] 22/23 27/7 bathing [1] 20/6 BAX [1] 2/7 be [23] became [1] 7/23 because [5] 15/25 16/16 21/11 22/13 24/3 become [1] 16/24 becoming [2] 8/2 19/15 been [9] 5/5 6/8 8/21 14/7 14/9 19/8 19/23 19/25 28/9 before [6] 5/15 8/21 14/4 19/16 28/25 31/8 before-entitled [1] 31/8 beginning [1] 9/17 being [7] 13/22 13/23 20/13 20/25 21/8 26/15 28/24 believe [4] 7/5 8/8 22/4 27/6 below [2] 25/17 28/16 beneath [1] 28/4 BERTHA [1] 2/14 best [2] 5/7 19/23

B	18/25 19/1 19/2 19/23 19/25 20/2 20/4 20/5 20/19	29/9
better [3] 6/22 16/3 25/25	caregiver [1] 20/21	coming [3] 9/25 20/9 22/1
bill [14]	caregivers [1] 20/9	communication [1] 22/1
billable [6] 10/23 11/18 20/1 27/16 28/13 28/23	case [4] 5/10 9/17 22/9 32/4	communicative [1] 21/24
billed [18]	cases [2] 9/19 10/10	community [2] 7/23 12/19
billing [18]	CERTIFICATE [1] 31/1	company [7] 6/25 7/2 8/1 11/18 18/24 19/1 19/9
bit [4] 6/16 17/25 25/18 25/25	certified [6] 19/4 19/6 19/11 19/12 19/15 21/5	condition [1] 21/21
bookmarks [1] 25/10	certify [1] 31/7	conducted [1] 10/15
both [4] 6/4 8/2 12/6 15/20	check [5] 16/23 17/11 28/3 28/4 28/14	constitutes [1] 31/12
bottom [4] 27/19 27/21 28/2 28/15	checking [4] 13/19 13/19 13/22 15/6	consulted [1] 16/17
break [2] 8/10 30/3	checks [4] 7/15 16/23 16/25 29/25	contain [1] 32/8
briefly [1] 11/14	Chief [1] 2/21	Contains [1] 32/11
broken [1] 15/15	CLARK [2] 1/2 31/4	continue [2] 13/16 25/19
brought [2] 8/5 29/14	clear [1] 29/21	contrasting [1] 20/18
building [1] 12/19	CLEVELAND [1] 2/4	control [1] 9/23
BYRD [1] 2/8	client [3] 10/21 12/20 18/25	COOK [1] 2/9
C	clients [1] 19/1	coordinating [1] 12/22
C.C.R [3] 1/25 31/6 31/18	closer [1] 6/16	coordination [2] 8/17 18/25
C321808 [1] 1/7	closets [1] 13/19	coordinator [1] 12/17
calculate [1] 11/22	clothing [1] 17/6	corner [2] 27/21 28/2
calls [1] 9/25	Club [4] 17/18 17/25 17/25 18/5	corporation [1] 16/11
came [1] 10/12	come [8] 7/16 7/22 8/24 9/19 19/1 20/5 26/23	correct [22]
can [15]		cost [1] 20/20
capacities [1] 19/22		
capacity [1] 14/13		
care [10] 18/18		

C	deposit [1] 16/19	29/2
could [3] 11/20 17/11 19/25	Deputy [3] 2/4 2/21 2/22	done [2] 10/17 19/25
COUNTY [2] 1/2 31/4	Devon [1] 7/14	DONOVAN [1] 2/11
couple [2] 21/15 29/5	did [32]	door [1] 19/2
course [1] 13/23	didn't [1] 12/24	down [8] 8/11 12/11 25/11 25/12 25/13 25/18 25/19 31/7
court [3] 1/1 9/16 32/23	differed [1] 20/17	draw [2] 25/8 26/25
create [1] 17/10	different [3] 13/18 18/7 24/8	Drizin's [2] 8/3 8/5
currently [1] 19/6	differs [1] 11/14	duly [2] 5/5 6/8
D	DIGITAL [1] 4/4	duration [2] 15/23 17/24
daily [1] 8/19	directing [1] 28/23	during [2] 13/5 13/17
Danette [7] 1/25 5/4 31/6 31/17 31/18 32/18 32/21	direction [12]	duties [3] 8/11 12/25 24/13
Daniel [1] 2/22	director [2] 7/20 12/18	duty [1] 24/16
date [4] 26/12 26/13 29/2 32/19	discuss [1] 17/15	E
Dated [1] 31/14	discussing [1] 19/9	each [5] 8/11 11/24 13/13 15/11 25/6
dates [1] 23/15	discussions [1] 15/21	Eighteen [2] 27/9 27/10
DAVID [1] 2/7	DISTRICT [2] 1/1 2/21	EIGHTH [1] 1/1
day [2] 15/9 28/9	divided [2] 15/16 15/17	either [1] 10/17
DC [1] 1/7	do [43]	elaborate [1] 19/20
deal [1] 24/20	doctor's [2] 10/3 20/8	electronic [1] 25/9
deductions [1] 23/16	doctors' [2] 14/1 14/3	ELLEN [1] 2/9
Defendants [1] 1/9	document [3] 10/18 10/22 11/24	Elmo [1] 8/23
deliver [1] 17/13	does [7] 11/2 20/3 21/22 28/7 28/18 32/4 32/8	else [2] 7/10 29/9
delivery [1] 24/2	doing [3] 15/6 19/16 22/1	email [4] 10/18 27/15 28/12 28/22
depend [1] 17/7	don't [8] 10/20 11/7 20/17 22/7 22/13 22/14 22/15	EMAILS [1] 4/9
depended [1] 14/13		
Depends [2] 17/5 18/17		
depicted [4] 23/6 26/3 26/9 27/13		

E	exhibit [10] 9/4 9/7 22/22 22/22 25/9 26/4 26/25 27/6 27/6 29/17	2/1 5/1 31/15
employed [5] 7/10 8/3 18/23 20/13 29/11	Exhibit 18 [1] 27/6	federal [2] 32/12 32/15
employee [1] 8/4	Exhibit 3 [3] 22/22 25/9 27/6	feel [1] 24/5
employees [1] 8/10	Exhibit 31 [1] 26/4	fees [1] 23/17
employment [1] 24/19	EXHIBITS [3] 4/1 4/3 8/22	few [1] 30/4
end [2] 19/7 29/13	expectation [1] 13/10	figure [1] 23/23
ended [1] 8/2	expected [1] 13/12	filed [1] 32/4
engaged [1] 14/15	explaining [1] 19/2	files [1] 10/1
enter [4] 10/23 11/18 11/19 11/23	exploitation [1] 5/22	filing [1] 5/23
entitled [1] 31/8	expressed [2] 20/15 29/24	fill [2] 23/20 24/24
escorts [1] 20/7	eyes [2] 13/21 14/19	filled [1] 19/22
essentially [1] 21/2	F	filling [2] 24/22 25/5
established [1] 16/12	facilities [3] 17/9 18/13 18/16	find [1] 25/20
estate [2] 19/24 21/14	facility [6] 7/18 14/8 14/10 14/17 15/10 29/23	fine [1] 13/17
even [2] 22/16 29/22	fact [1] 24/12	first [11]
event [1] 11/21	faithfully [1] 5/5	five [4] 15/11 17/16 17/19 30/4
eventually [2] 10/21 29/13	false [1] 5/23	flowers [2] 24/3 24/11
ever [3] 15/21 24/20 26/18	familiar [5] 6/24 7/2 16/6 23/8 23/9	following [1] 5/6
every [1] 18/2	families [2] 9/16 9/17	follows [1] 6/10
everybody [1] 6/17	February [4] 1/14	foregoing [1] 31/11
everyone [1] 6/23		Foreperson [3] 2/3 2/4 6/8
everything [1] 15/24		form [3] 17/10 17/10 25/6
EXAMINATION [1] 6/12		formalized [2] 10/13 16/17
Examined [1] 3/2		format [1] 10/20
example [2] 17/16 17/24		forms [4] 17/9 24/23 24/25 25/5
		frequency [1] 22/14
		frequent [1] 14/16
		frequented [1] 17/25

F friends [1] 7/23 front [2] 22/17 25/9 full [1] 31/12 funds [2] 24/1 24/3	got [4] 15/2 16/21 22/18 25/22 GOTHARD [1] 2/5 GRAND [12] grant [1] 32/16 grave [1] 24/11 gravesite [1] 24/3 group [7] 8/17 12/23 13/19 14/11 14/12 14/15 17/8 guardian [18] guardianship [1] 23/2	25/20 29/12 her [19] here [8] 5/20 7/18 7/19 8/24 24/8 26/3 26/9 28/22 hereby [2] 31/7 32/4 hi [1] 21/25 him [5] 23/10 23/11 23/21 28/23 29/15 hired [2] 7/12 7/25 his [5] 8/4 23/8 23/9 23/11 29/21 home [9] 12/23 18/25 18/25 19/2 19/25 20/2 20/4 22/2 22/9 homeowners [1] 13/20 homes [2] 8/17 17/8 hospital [1] 12/21 hour [14] hours [12] house [2] 7/15 29/25 housekeeping [1] 20/6 housing [1] 12/23 how [25] husband [1] 7/13
G GARY [2] 1/8 5/25 gears [1] 24/18 General [1] 2/22 generate [2] 10/9 12/20 gentlemen [2] 5/10 30/3 GERALDINE [1] 2/17 get [11] give [5] 5/15 5/21 9/18 10/2 17/12 given [4] 10/14 16/19 28/9 28/24 giving [2] 11/25 19/23 GJ [1] 1/7 gloves [1] 18/18 go [13] goal [3] 13/4 13/7 13/9 God [1] 5/17 goes [1] 27/25 going [7] 8/22 8/24 9/16 20/21 29/16 29/17 29/25 Golden [7] 16/5 16/7 16/8 16/11 16/14 16/21 16/25 gone [1] 18/6 Good [2] 5/9 6/15	H had [18] half [2] 7/7 28/19 hand [6] 5/13 23/15 23/15 27/21 28/2 28/15 handle [2] 9/19 10/19 handled [1] 9/24 HANDWRITTEN [1] 4/8 handwriting [6] 23/5 23/7 23/8 23/9 27/20 28/14 handwritten [2] 23/3 23/4 has [1] 28/2 have [14] having [2] 5/5 6/8 he [15] hear [2] 6/17 6/23 help [6] 5/17 9/25 19/1 20/5	I I'd [3] 21/15 25/8 26/25 I'm [9] 8/22 9/3 12/13 13/6 13/15

I I'm... [4] 16/8 21/6 29/16 29/17 Identified [1] 4/3 included [1] 13/1 incontinent [1] 18/18 incorporated [1] 16/24 increased [1] 20/16 increments [3] 12/1 12/3 12/4 independently [1] 14/15 INDEX [2] 3/1 4/1 indicate [1] 28/19 indicated [1] 31/9 individually [2] 14/10 15/4 informed [1] 29/22 initially [4] 9/14 10/16 13/4 16/23 initials [3] 28/3 28/5 28/15 ins [1] 11/17 installed [1] 29/1 instead [1] 11/24 instructed [4] 12/2 12/5 18/11 18/20 instructions [1] 14/22 instrument [1] 5/23	interacting [1] 15/7 interaction [1] 9/15 interactions [1] 8/19 interest [2] 21/12 21/13 interrupt [1] 13/6 interrupted [1] 13/15 investigation [2] 5/15 5/21 investigators [2] 23/22 23/25 invited [1] 7/22 involved [1] 9/17 involving [1] 5/24 is [39] it [56] it's [10] 8/24 21/11 21/13 22/18 24/8 25/17 25/23 26/10 26/20 27/6 item [1] 11/20 items [6] 10/3 17/5 17/7 17/13 18/16 18/19 J Jay [1] 2/21 job [1] 17/17 JOHN [1] 2/13 JUDICIAL [1] 1/1 JURORS [1] 2/1 Jury [11] just [14]	K Keep [1] 25/17 kind [5] 8/10 22/19 22/19 29/5 29/7 know [15] knowledge [1] 25/6 L ladies [2] 5/9 30/2 laid [1] 13/10 Las [4] 1/13 5/1 20/22 31/14 last [3] 6/4 6/6 25/16 law [1] 32/12 LAWRENCE [1] 2/18 lay [1] 14/18 LAYNE [1] 2/6 leads [1] 12/20 lean [1] 6/15 learn [1] 11/18 learned [1] 19/14 least [1] 13/13 leaving [1] 29/14 ledger [1] 23/16 Lee [2] 8/3 8/5 left [4] 8/25 23/15 24/1 25/10 legal [1] 8/13 less [3] 12/7 20/24 25/2 let [2] 14/2 27/13 let's [1] 15/8 level [1] 14/13 life [1] 22/3 light [1] 20/6 like [16]
---	--	---

L	manager [1] 8/14	MICHAEL [1] 2/16
line [1] 11/20	manipulate [1]	might [1] 23/17
list [1] 17/10	22/19	mind [1] 29/4
little [3] 6/16	manner [1] 17/23	minute [2] 12/4
25/25 28/6	many [2] 22/15	24/18
lived [1] 22/2	22/16	minutes [8] 11/21
living [5] 7/18	mark [40]	12/8 12/9 12/10
7/20 12/23 13/20	Mark's [1] 9/22	15/4 25/1 30/4
17/9	marked [1] 8/22	30/5
livings [1] 8/18	market [2] 20/20	Miss [4] 6/15
log [2] 11/17	20/22	6/24 22/17 27/12
29/24	marketing [6]	Miss Sanchez [4]
log-ins [1] 11/17	7/19 10/8 10/8	6/15 6/24 22/17
long [4] 22/14	10/9 12/18 12/19	27/12
24/24 25/1 26/20	MARRENA [1] 2/15	MISSOURI [1] 2/11
look [3] 7/23	MARTIN [1] 2/10	MISSOURI-DONOVAN
23/17 27/12	MARY [1] 2/5	[1] 2/11
looking [2] 24/8	matter [1] 31/8	moment [1] 24/7
27/5	may [4] 13/18	month [7] 7/21
looks [2] 23/16	14/9 19/23 26/16	10/19 11/24 13/13
25/22	maybe [2] 20/6	19/7 22/11 22/16
lot [2] 8/18 20/9	25/1	monthly [2] 13/4
lower [1] 20/1	me [24]	13/7
luncheons [2]	mean [4] 8/15	months [1] 7/6
7/21 7/22	20/3 21/22 28/7	more [5] 9/13
lying [1] 13/21	means [2] 16/15	12/20 14/7 14/18
	16/16	22/10
M	meant [1] 28/8	MORTALONI [1] 2/3
made [3] 11/7	medications [1]	moved [2] 7/18
19/15 29/1	15/7	11/5
Main [1] 27/6	meet [1] 26/18	Mr. [3] 29/18
maintain [1] 9/25	meeting [1] 26/11	29/20 29/22
majority [1] 9/24	meetings [1]	Mr. Taylor [2]
make [4] 6/16	27/17	29/18 29/22
15/24 23/19 28/20	MELVINA [1] 2/11	Mr. Taylor's [1]
making [2] 16/3	members [3] 8/23	29/20
23/21	22/21 25/24	much [1] 15/22
man [1] 9/8	mentioned [4] 8/9	multiple [3] 14/9
manage [2] 10/1	12/14 12/25 17/1	15/1 18/2
16/18	met [2] 7/17 7/21	my [17]
managed [1] 8/18	mic [1] 6/16	myself [6] 7/13