

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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**No. 84612**

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~~Elizabeth A. Brown~~  
Clerk of Supreme Court

**APRIL PARKS**

Appellant,

v.

**THE STATE OF NEVADA,**

Respondent.

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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

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**APPELLANT'S APPENDIX  
VOLUME II**

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18/20 22/22 27/21	<b>toileting</b> [1]	<b>true</b> [1] 31/12
<b>there</b> [43]	20/7	<b>truth</b> [6] 5/16
<b>there's</b> [7] 15/8	<b>toiletries</b> [2]	5/16 5/17 6/9 6/9
17/16 22/18 23/15	17/17 18/6	6/10
25/10 26/25 29/4	<b>toiletry</b> [2] 17/7	<b>trying</b> [1] 23/23
<b>thereafter</b> [1]	18/16	<b>Tuesday</b> [1] 1/14
31/9	<b>told</b> [6] 11/2	<b>two</b> [5] 7/6 15/10
<b>these</b> [10] 8/22	15/18 18/10 23/23	15/12 15/13 27/13
14/5 18/19 20/2	23/25 29/8	<b>type</b> [1] 10/11
21/7 23/13 23/19	<b>Tommy</b> [1] 29/13	<b>U</b>
23/21 25/5 28/24	<b>took</b> [4] 12/7	<b>under</b> [1] 31/10
<b>they</b> [12]	12/10 25/5 31/7	<b>undersigned</b> [1]
<b>they'd</b> [1] 17/11	<b>top</b> [1] 10/1	32/4
<b>thin</b> [1] 30/3	<b>total</b> [3] 15/9	<b>understand</b> [1]
<b>thing</b> [4] 13/1	15/10 15/11	6/1
14/4 28/11 28/21	<b>touch</b> [1] 22/19	<b>until</b> [1] 29/23
<b>things</b> [5] 12/14	<b>towards</b> [2] 6/20	<b>up</b> [12]
13/1 13/18 21/7	29/13	<b>upon</b> [2] 5/15
29/5	<b>town</b> [1] 7/18	28/24
<b>think</b> [6] 12/25	<b>track</b> [1] 11/25	<b>us</b> [14]
19/15 25/15 25/17	<b>tracking</b> [1]	<b>use</b> [1] 19/23
25/23 27/22	10/17	<b>usually</b> [1] 14/6
<b>Thirteen</b> [1] 27/8	<b>traffic</b> [1] 9/23	<b>utilizing</b> [1]
<b>this</b> [17]	<b>training</b> [3]	26/6
<b>those</b> [15]	10/11 10/13 11/17	<b>V</b>
<b>though</b> [3] 21/3	<b>transcribe</b> [1]	<b>varied</b> [1] 12/18
22/13 23/14	5/6	<b>Vegas</b> [4] 1/13
<b>through</b> [8] 7/21	<b>transcribed</b> [1]	5/1 20/22 31/14
9/19 9/25 11/23	31/10	<b>very</b> [1] 23/12
19/1 19/6 20/9	<b>transcript</b> [3]	

<b>V</b>	10/5 11/16 13/22 13/23 14/4 14/14 23/12 28/16 29/14	<b>WOJNAROWSKI [1]</b> 2/17
<b>visit [7]</b> 13/3 13/4 13/7 13/13 13/17 21/23 22/6	<b>well-being [2]</b> 13/22 13/23	<b>woman [1]</b> 9/4
<b>visited [1]</b> 22/8	<b>went [5]</b> 10/21 17/25 18/5 22/5 29/23	<b>WONG [1]</b> 2/18
<b>visits [7]</b> 8/18 10/5 13/1 14/2 14/6 14/23 30/1	<b>were [34]</b>	<b>Word [3]</b> 10/18 10/22 11/24
<b>VOLUME [1]</b> 1/21	<b>Westmeyer [1]</b> 2/22	<b>work [8]</b> 7/4 8/1 12/12 12/13 18/24 21/2 29/9 29/14
<b>W</b>	<b>what [37]</b>	<b>worked [3]</b> 7/3 8/10 9/11
<b>wait [1]</b> 26/20	<b>what's [5]</b> 8/21 26/3 26/9 28/4 28/4	<b>working [15]</b>
<b>Walmart [1]</b> 17/18	<b>whatever [5]</b> 15/2 17/17 17/18 18/6 29/1	<b>works [2]</b> 11/14 18/25
<b>want [8]</b> 6/16 8/20 8/21 14/3 16/5 17/15 24/18 29/15	<b>when [27]</b>	<b>worse [1]</b> 16/1
<b>wanted [1]</b> 29/5	<b>where [4]</b> 11/19 15/9 25/10 27/23	<b>worth [1]</b> 18/8
<b>ward [22]</b>	<b>whether [5]</b> 12/20 14/14 15/5 18/13 24/15	<b>would [76]</b>
<b>ward's [4]</b> 17/8 17/11 19/24 21/14	<b>which [2]</b> 27/6 28/23	<b>wouldn't [1]</b> 21/8
<b>wards [15]</b>	<b>while [8]</b> 11/9 11/11 16/12 19/12 19/16 19/17 20/13 29/10	<b>write [1]</b> 16/22
<b>wards' [1]</b> 8/19	<b>who [7]</b> 7/10 8/15 12/5 15/18 18/10 26/21 29/8	<b>written [1]</b> 16/23
<b>was [88]</b>	<b>whole [2]</b> 5/16 6/9	<b>wrong [1]</b> 21/6
<b>wasn't [7]</b> 15/15 15/16 15/17 16/2 21/24 29/21 29/22	<b>why [1]</b> 21/19	<b>wrote [1]</b> 16/25
<b>way [3]</b> 15/18 18/10 18/11	<b>wit [1]</b> 32/13	<b>Y</b>
<b>WAYNE [1]</b> 2/4	<b>within [2]</b> 14/10 20/10	<b>yeah [3]</b> 7/9 21/13 25/20
<b>we [23]</b>	<b>witness [1]</b> 5/11	<b>year [1]</b> 7/7
<b>we'd [2]</b> 10/8 10/9	<b>WITNESSES [1]</b> 3/1	<b>yes [14]</b>
<b>we'll [3]</b> 25/20 30/4 30/4		<b>you [140]</b>
<b>we're [2]</b> 25/14 27/5		<b>you're [3]</b> 15/10 21/5 23/8
<b>we've [1]</b> 19/8		<b>you've [2]</b> 19/14 25/22
<b>Weber [4]</b> 21/17 22/6 23/2 24/10		<b>your [14]</b>
<b>well [10]</b> 8/1		<b>yourself [3]</b> 19/4 21/6 21/9
		<b>Z</b>
		<b>zero [1]</b> 23/23

ORIGINAL

1 IND

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FILED IN OPEN COURT  
STEVEN D. GRIERSON  
CLERK OF THE COURT

MAR 08 2017

BY   
DULCE MARIE ROMEA, DEPUTY

DISTRICT COURT  
CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,

13 Plaintiff,

14 -vs-

15 APRIL PARKS #1571645  
16 MARK SIMMONS  
17 GARY NEAL TAYLOR  
18 NOEL PALMER SIMPSON

19 Defendant(s).

CASE NO: C-17-321808-1

DEPT NO: X

INDICTMENT

19 STATE OF NEVADA }  
20 COUNTY OF CLARK } ss.

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

C-17-321808-1

IND  
Indictment  
4830111



AA 0227

123

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

4 COUNT 1 - RACKETEERING

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

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

9 COUNT 2 - THEFT

10 Defendants APRIL PARKS and MARK SIMMONS did on or between May 3, 2012  
11 and July 11, 2012 willfully, knowingly, feloniously, and without lawful authority, use the  
12 services or property of another person entrusted to them, or placed in their possession for a  
13 limited, authorized period of determined or prescribed duration or for a limited use, having a  
14 value of \$3,500.00 or more, belonging to AUDREY WEBER and/or the ESTATE OF  
15 AUDREY WEBER, in the following manner, to wit: through the use of a false billing scheme,  
16 thereby unlawfully converting money belonging to AUDREY WEBER and/or the ESTATE  
17 OF AUDREY WEBER in the amount of approximately \$3,819.60. Defendants are criminally  
18 liable under one or more of the following principles of criminal liability, to wit: (1) by directly  
19 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
20 the intent that this crime be committed, by providing counsel and/or encouragement and by  
21 entering into a course of conduct whereby APRIL PARKS acted as guardian for AUDREY  
22 WEBER and overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on  
23 behalf of A Private Professional Guardian, LLC that either did not benefit AUDREY WEBER  
24 or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson  
25 to do the same; and MARK SIMMONS documented the same ward visits, shopping trips,  
26 bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either  
27 did not benefit AUDREY WEBER or did not occur, and/or directed Angelica Sanchez and/or  
28 ///

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

3 COUNT 3 - THEFT

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

12 COUNT 4 - THEFT

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



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

10 COUNT 5 - THEFT

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

20 COUNT 6 - EXPLOITATION OF AN OLDER PERSON

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

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

16 COUNT 7 - THEFT

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

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

13 COUNT 8 - EXPLOITATION OF AN OLDER PERSON

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

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

9 COUNT 9 - THEFT

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

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

3 COUNT 10 - EXPLOITATION OF AN OLDER PERSON

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

25 COUNT 11 - THEFT

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

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

18 COUNT 12 - EXPLOITATION OF AN OLDER PERSON

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

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

12 COUNT 13 - THEFT

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

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

6 COUNT 14 - EXPLOITATION OF AN OLDER PERSON

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

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1 COUNT 15 - THEFT

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

23 COUNT 16 - EXPLOITATION OF AN OLDER PERSON

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

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

17 COUNT 17 - THEFT

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

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

11 COUNT 18 - EXPLOITATION OF AN OLDER PERSON

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

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

5 COUNT 19 - THEFT

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

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1 COUNT 20 - EXPLOITATION OF AN OLDER PERSON

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

23 COUNT 21 - THEFT

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

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

17 COUNT 22 - EXPLOITATION OF AN OLDER PERSON

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

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

11 COUNT 23 - THEFT

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

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

5 COUNT 24 - EXPLOITATION OF AN OLDER PERSON

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

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1 COUNT 25 - THEFT

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

23 COUNT 26 - EXPLOITATION OF AN OLDER PERSON

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

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

17 COUNT 27 - THEFT

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

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

11 COUNT 28 - EXPLOITATION OF AN OLDER PERSON

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

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

4 COUNT 29 - THEFT

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

25 COUNT 30 - EXPLOITATION OF AN OLDER PERSON

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

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

19 COUNT 31 - THEFT

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

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

13 COUNT 32 - EXPLOITATION OF AN OLDER PERSON

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

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

6 COUNT 33 - THEFT

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

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1 COUNT 34 - EXPLOITATION OF AN OLDER PERSON

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

23 COUNT 35 - THEFT

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



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

17 COUNT 36 - EXPLOITATION OF AN OLDER PERSON

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

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

11 COUNT 37 - THEFT

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

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

5 COUNT 38 - EXPLOITATION OF AN OLDER PERSON

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

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1 COUNT 39 - THEFT

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

23 COUNT 40 - EXPLOITATION OF AN OLDER PERSON

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

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

16 COUNT 41 - THEFT

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

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

10 COUNT 42 - EXPLOITATION OF AN OLDER PERSON

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

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

4 COUNT 43 - THEFT

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

26 COUNT 44 - EXPLOITATION OF AN OLDER PERSON

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

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

19 COUNT 45 - THEFT

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



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

12 COUNT 46 - EXPLOITATION OF AN OLDER PERSON

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

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

5 COUNT 47 - THEFT

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

26 COUNT 48 - EXPLOITATION OF AN OLDER PERSON

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

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

19 COUNT 49 - THEFT

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

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

13 COUNT 50 - EXPLOITATION OF AN OLDER PERSON

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

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

7 COUNT 51 - THEFT

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

1 COUNT 52 - EXPLOITATION OF AN OLDER PERSON

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

23 COUNT 53 - THEFT

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

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

17 COUNT 54 - EXPLOITATION OF AN OLDER PERSON

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

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

11 COUNT 55 - THEFT

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



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

5 COUNT 56 - EXPLOITATION OF A VULNERABLE PERSON

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

26 COUNT 57 - THEFT

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

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

20 COUNT 58 - EXPLOITATION OF AN OLDER PERSON

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

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

14 COUNT 59 - THEFT

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

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

8 COUNT 60 - EXPLOITATION OF AN OLDER PERSON

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

1 COUNT 61 - THEFT

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

23 COUNT 62 - EXPLOITATION OF AN OLDER PERSON

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

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

20 COUNT 63 - THEFT

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

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

17 COUNT 64 - EXPLOITATION OF AN OLDER PERSON

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

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

10 COUNT 65 - THEFT

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



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

4 COUNT 66 - EXPLOITATION OF AN OLDER PERSON

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

25 COUNT 67 - THEFT

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

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

19 COUNT 68 - EXPLOITATION OF AN OLDER PERSON

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

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

12 COUNT 69 - THEFT

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

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

6 COUNT 70 - EXPLOITATION OF AN OLDER PERSON

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

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28 ///

1 COUNT 71 - THEFT

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

22 COUNT 72 - EXPLOITATION OF AN OLDER PERSON

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

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

17 COUNT 73 - THEFT

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

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

13 COUNT 74 - EXPLOITATION OF A VULNERABLE PERSON

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

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

9 COUNT 75 - THEFT

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



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

6 COUNT 76 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

13 COUNT 77 - EXPLOITATION OF AN OLDER PERSON

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

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

5 COUNT 78 - THEFT

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

26 COUNT 79 - EXPLOITATION OF AN OLDER PERSON

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

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

21 COUNT 80 - THEFT

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

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

17 COUNT 81 - THEFT

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

1 COUNT 82 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

8 COUNT 83 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

16 COUNT 84 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

6 COUNT 85 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

13 COUNT 86 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 87 - PERJURY

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

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1    COUNT 88 - PERJURY

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

11   COUNT 89 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

18   COUNT 90 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

25   COUNT 91 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

4 COUNT 92 - PERJURY

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

11 COUNT 93 - PERJURY

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

21 COUNT 94 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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1 COUNT 95 - PERJURY

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

9 COUNT 96 - PERJURY

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

19 COUNT 97 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

26 COUNT 98 - PERJURY

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

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

6 COUNT 99 - PERJURY

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

16 COUNT 100 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

23 COUNT 101 - PERJURY

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

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

3 COUNT 102 - PERJURY

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

13 COUNT 103 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 104 - PERJURY

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

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1 COUNT 105 - PERJURY

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

11 COUNT 106 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

18 COUNT 107 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

25 COUNT 108 - PERJURY

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

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

4 COUNT 109 - PERJURY

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

14 COUNT 110 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

21 COUNT 111 - PERJURY

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

1 COUNT 112 - PERJURY

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

11 COUNT 113 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

18 COUNT 114 - PERJURY

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

26 COUNT 115 - PERJURY

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

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

8 COUNT 116 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

15 COUNT 117 - PERJURY

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

23 COUNT 118 - PERJURY

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

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

5 COUNT 119 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

12 COUNT 120 - PERJURY

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

20 COUNT 121 - PERJURY

21 Defendant MARK SIMMONS did on or about October 2, 2013, suborn APRIL PARKS  
22 to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private  
23 Professional Guardian, LLC to falsify records, of the amount and value of services provided  
24 in the guardianship case of DELMOND FOSTER G-10-035339-A, knowing that APRIL  
25 PARKS would knowingly offer for filing with the Clark County District Court, under penalty  
26 of perjury, a First Annual Accounting and Report of Guardian in the guardianship case of  
27 DELMOND FOSTER G-10-035339-A, which document claimed that APRIL PARKS was  
28



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

3 COUNT 122 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

10 COUNT 123 - PERJURY

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

18 COUNT 124 - PERJURY

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

1 COUNT 125 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

9 COUNT 126 - PERJURY

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

17 COUNT 127 - PERJURY

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

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1 COUNT 128 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

8 COUNT 129 - PERJURY

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

16 COUNT 130 - PERJURY

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

26 COUNT 131 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

5 COUNT 132 - PERJURY

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

14 COUNT 133 - PERJURY

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

25 COUNT 134 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

5 COUNT 135 - PERJURY

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

13 COUNT 136 - PERJURY

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

23 COUNT 137 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

3 COUNT 138 - PERJURY

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

11 COUNT 139 - PERJURY

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

21 COUNT 140 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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1 COUNT 141 - PERJURY

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

9 COUNT 142 - PERJURY

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

19 COUNT 143 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

26 COUNT 144 - PERJURY

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

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

6 COUNT 145 - PERJURY

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

16 COUNT 146 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

23 COUNT 147 - PERJURY

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



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

3 COUNT 148 - PERJURY

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

13 COUNT 149 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 150 - PERJURY

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

1 COUNT 151 - PERJURY

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

12 COUNT 152 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 153 - PERJURY

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

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1 COUNT 154 - PERJURY

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

11 COUNT 155 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

18 COUNT 156 - PERJURY

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

26 COUNT 157 - PERJURY

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

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

8 COUNT 158 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

15 COUNT 159 - PERJURY

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

22 COUNT 160 - PERJURY

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

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

4 COUNT 161 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

11 COUNT 162 - PERJURY

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

19 COUNT 163 - PERJURY

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

1 COUNT 164 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

8 COUNT 165 - PERJURY

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

17 COUNT 166 - PERJURY

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

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1 COUNT 167 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

9 COUNT 168 - PERJURY

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

16 COUNT 169 - PERJURY

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

26 COUNT 170 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

5 COUNT 171 - PERJURY

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

13 COUNT 172 - PERJURY

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

23 COUNT 173 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

3 COUNT 174 - PERJURY

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

11 COUNT 175 - PERJURY

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

22 COUNT 176 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

3 COUNT 177 - PERJURY

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

11 COUNT 178 - PERJURY

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

21 COUNT 179 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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1    COUNT 180 - PERJURY

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

9    COUNT 181 - PERJURY

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

19    COUNT 182 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

26    COUNT 183 - PERJURY

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

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

6 COUNT 184 - PERJURY

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

17 COUNT 185 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

25 COUNT 186 - PERJURY

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

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

5 COUNT 187 - PERJURY

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

15 COUNT 188 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

22 COUNT 189 - PERJURY

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

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

3 COUNT 190 - PERJURY

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

13 COUNT 191 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 192 - PERJURY

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

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1 COUNT 193 - PERJURY

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

11 COUNT 194 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

18 COUNT 195 - PERJURY

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

26 COUNT 196 - PERJURY

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

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

8 COUNT 197 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

15 COUNT 198 - PERJURY

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

23 COUNT 199 - PERJURY

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



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

5 COUNT 200 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

12 COUNT 201 - PERJURY

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

19 COUNT 202 - PERJURY

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

1    COUNT 203 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

8    COUNT 204 - PERJURY

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

16   COUNT 205 - PERJURY

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

26   COUNT 206 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

5 COUNT 207 - PERJURY

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

13 COUNT 208 - PERJURY

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

23 COUNT 209 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

3 COUNT 210 - PERJURY

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

10 COUNT 211 - PERJURY

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

20 COUNT 212 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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1 COUNT 213 - PERJURY

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

9 COUNT 214 - PERJURY

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

19 COUNT 215 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

26 COUNT 216 - PERJURY

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

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

6 COUNT 217 - PERJURY

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

16 COUNT 218 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

23 COUNT 219 - PERJURY

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

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

3 COUNT 220 - PERJURY

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

13 COUNT 221 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 222 - PERJURY

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

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1    COUNT 223 - PERJURY

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

11   COUNT 224 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

18   COUNT 225 - PERJURY

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

26   COUNT 226 - PERJURY

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



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

8 COUNT 227 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

15 COUNT 228 - PERJURY

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

23 COUNT 229 - PERJURY

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

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

5 COUNT 230 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

12 COUNT 231 - PERJURY

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

19 COUNT 232 - PERJURY

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

1 COUNT 233 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

8 COUNT 234 - PERJURY

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

16 COUNT 235 - PERJURY

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

26 COUNT 236 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

5 COUNT 237 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

13 COUNT 238 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 239 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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1 COUNT 240 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

9 COUNT 241 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

16 COUNT 242 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

23 COUNT 243 - PERJURY

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

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

3 COUNT 244 - PERJURY

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

13 COUNT 245 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 246 - PERJURY

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

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1 COUNT 247 - PERJURY

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

12 COUNT 248 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 249 - PERJURY

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

28 ///

1 COUNT 250 - PERJURY

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

12 COUNT 251 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

20 COUNT 252 - PERJURY

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

28 ///



1 COUNT 253 - PERJURY

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

12 COUNT 254 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

19 COUNT 255 - PERJURY

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

27 ///

28 ///

1 COUNT 256 - PERJURY

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

11 COUNT 257 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

18 COUNT 258 - PERJURY

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

26 COUNT 259 - PERJURY

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

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

8 COUNT 260 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

15 COUNT 261 - PERJURY

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

22 COUNT 262 - PERJURY

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

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

4 COUNT 263 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

11 COUNT 264 - PERJURY

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

19 COUNT 265 - PERJURY

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

1 COUNT 266 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

8 COUNT 267 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

16 COUNT 268 - PERJURY

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

24 COUNT 269 - PERJURY

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

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

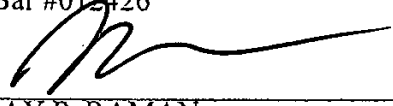
7 COUNT 270 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

15 DATED this 7<sup>th</sup> day of March, 2017.

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

22 BY

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

26 BY

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

29 ENDORSEMENT: A True Bill

30   
Foreperson, Clark County Grand Jury

1 Names of Witnesses and testifying before the Grand Jury:

2 BISHOP, TODD

3 EUGENIO, JOSEPHINE

4 FORD, DIANE

5 HAYNES, COLIN

6 KEILTY, EDWARD

7 KELLY, KAREN

8 KRAMER, HEIDI

9 LIEBO, JULIE

10 NORHEIM, JON

11 O'MALLEY, JACLYN

12 SANCHEZ, ANGELICA

13 WOODRUM, HOMA

14

15

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

17 Indictment:

18 CUSTODIAN OF RECORDS, CCDC

19 CUSTODIAN OF RECORDS, LVMPD COMMUNICATIONS

20 CUSTODIAN OF RECORDS, LVMPD RECORDS

21

22

23

24

25

26

27 16AGJ151A-D/mc-GJ  
28 LVMPD EV#1508192043  
(TK)

**GRAND JURY INDICTMENTS RETURNED IN OPEN COURT MARCH 8, 2017**  
(From Grand Jury sessions held on March 7, 2017)

**JUDGE JENNIFER TOGLIATTI**  
**FOREPERSON PAUL MORTALONI**

**CHIEF DEPUTY DISTRICT ATTORNEY JAY P. RAMAN (010193)**  
**SENIOR DEPUTY ATTORNEY GENERAL DANIEL WESTMEYER (010273)**  
**CHIEF DEPUTY DISTRICT ATTORNEY MICHAEL SCHWARTZER (010747)**

**CASE NO. C-17-321808-1, -2, -3, -4**  
**DEPT. NO. X**  
**CDDA JAY P. RAMAN (FDD)**  
**SDAG DANIEL WESTMEYER (AG)**

**Defendant(s):** **APRIL PARKS #1571645**  
**MARK SIMMONS**  
**GARY NEAL TAYLOR**  
**NOEL PALMER SIMPSON**

**Case No(s):** **16AGJ151A-D (RANDOMLY TRACKS TO ANY DEPARTMENT)**

**Charge(s):** *As to Defendant PARKS:*  
**(1) CT - RACKETEERING (Category B Felony - NRS 207.400 - NOC 53190);**  
**(33) CTS - THEFT (Category B Felony - NRS 205.0832, 205.0835.4 - NOC 55991);**  
**(19) CTS - EXPLOITATION OF AN OLDER PERSON (Category B Felony - NRS 200.5092, 200.5099 - NOC 50304);**  
**(18) CTS - EXPLOITATION OF AN OLDER PERSON/VULNERABLE PERSON (Category B Felony - NRS 200.5092, 200.5099 - NOC 55984);**  
**(9) CTS - THEFT (Category C Felony - NRS 205.0832, 205.0835.3 - NOC 55989);**  
**(74) CTS - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD (Category C Felony - NRS 239.330 - NOC 52399) and**  
**(58) CTS - PERJURY (Category D Felony - NRS 199.120 - NOC 52971)**

*As to Defendant SIMMONS:*  
**(1) CT - RACKETEERING (Category B Felony - NRS 207.400 - NOC 53190);**  
**(30) CTS - THEFT (Category B Felony - NRS 205.0832, 205.0835.4 - NOC 55991);**  
**(19) CTS - EXPLOITATION OF AN OLDER PERSON (Category B Felony - NRS 200.5092, 200.5099 - NOC 50304);**  
**(18) CTS - EXPLOITATION OF AN OLDER PERSON/VULNERABLE PERSON (Category B Felony - NRS 200.5092, 200.5099 - NOC 55984);**  
**(8) CTS - THEFT (Category C Felony - NRS 205.0832, 205.0835.3 - NOC 55989) and**  
**(58) CTS - PERJURY (Category D Felony - NRS 199.120 - NOC 52971)**

**CONTINUED ON NEXT PAGE...**



**As to Defendant TAYLOR:**

- (1) CT - RACKETEERING (Category B Felony - NRS 207.400 - NOC 53190);  
(2) CTS - THEFT (Category B Felony - NRS 205.0832, 205.0835.4 - NOC 55991);  
(1) CT - EXPLOITATION OF AN OLDER PERSON (Category B Felony - NRS 200.5092, 200.5099 - NOC 50304);  
(2) CTS - EXPLOITATION OF AN OLDER PERSON/VULNERABLE PERSON (Category B Felony - NRS 200.5092, 200.5099 - NOC 55984) and  
(1) CT - THEFT (Category C Felony - NRS 205.0832, 205.0835.3 - NOC 55989)

**As to Defendant SIMPSON:**

- (1) CT - THEFT (Category B Felony - NRS 205.0832, 205.0835.4 - NOC 55991) and  
(1) CT - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD (Category C Felony - NRS 239.330 - NOC 52399)

**Def. Counsel(s):** PARKS - KEITH BROWER, ESQ.  
SIMMONS - JULIAN GREGORY, ESQ.  
TAYLOR - UNKNOWN  
SIMPSON - WILLIAM B. TERRY, ESQ.

**WARRANTS (NO DATE):**

PARKS - No Bail  
SIMMONS - No Bail  
TAYLOR - 200K w/ src hrg  
SIMPSON - 7500 cash / 50K surety - 3.22 @ 8:30 DCID

**DEFTS ARE NOT IN CUSTODY**

**Exhibits:**

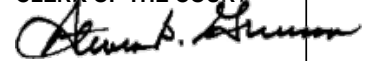
- |                                |                             |
|--------------------------------|-----------------------------|
| 1. Proposed Indictment         | 8. Affidavit                |
| 1a. Second Proposed Indictment | 9. Text Messages            |
| 2. Jury Instructions           | 10. Text Messages           |
| 2a. Jury Instructions          | 11. DVD                     |
| 3. DVD                         | 12. Wavier for A/U Tech     |
| 4. Organizational Chart        | 13. Photo                   |
| 5. Photo                       | 14. Spreadsheet             |
| 6. Photo                       | 15. Spreadsheet of Exhibits |
| 7. Photo                       | 16. NRS copies              |

**Exhibits 1 - 16 to be lodged with the Clerk of the Court.**

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**VS.**

[illegible]



RTRAN

DISTRICT COURT  
CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff,

vs.

APRIL PARKS,

Defendant.

CASE NO. C-17-321808-1  
DEPT. X

***BEFORE THE HONORABLE TIERRA JONES, DISTRICT COURT JUDGE***

***FRIDAY, OCTOBER 5, 2018  
RECORDER'S TRANSCRIPT RE:  
SENTENCING***

**APPEARANCES:**

For the State:

JAY RAMAN, Esq.  
Chief Deputy District Attorney

DANIEL WESTMEYER, Esq.  
Senior Deputy Attorney General

For the Defendant:

ANTHONY GOLDSTEIN, Esq.

RECORDED BY: VICTORIA BOYD, COURT RECORDER

1 Las Vegas, Nevada, Friday, November 5, 2018 at 9:25 a.m.

2  
3  
4 THE COURT: Ms. Parks is here in custody with Mr. Goldstein. Ms. Parks is  
5 also here on C329886-2. She's also present with Mr. Goldstein. So this is on for a  
6 status check on trial readiness. Where are we in regards to Ms. Parks?

7 MR. GOLDSTEIN: Your Honor, Anthony Goldstein for the defendant. She's  
8 here in custody. I submitted two guilty pleas to resolve both of her cases under the  
9 same global negotiation. They are contingent with Mr. Taylor and Mr. Simmons and  
10 Ms. Simpson. My understanding is all of them have signed their respective  
11 agreements and submitted them to the Court, Your Honor.

12 THE COURT: Okay.

13 Ms. Parks, is that your understanding?

14 THE DEFENDANT: It is.

15 THE COURT: So we're going to go on C321808. In regards to that case it's  
16 my understanding today that you're going to plead guilty pursuant to North Carolina  
17 v. Alford to two counts of exploitation of an older, vulnerable person, two counts of  
18 theft and one count of perjury in that case. Is that your understanding?

19 THE DEFENDANT: Yes, it is.

20 THE COURT: You are also agreeing to plead guilty pursuant to North  
21 Carolina v. Alford to one count of exploitation of an older, vulnerable person in case  
22 C329886.

23 THE DEFENDANT: Yes, Your Honor.

24 THE COURT: You agree to pay full restitution in the amount of \$559,205.32  
25 jointly and severally between yourself, Mark Simmons and Gary Neal Taylor. The

1 State and you will have the full right to argue for any legal sentence in this case.  
2 This case will run concurrent to C329886 and with the understanding that you  
3 rejected a stipulated aggregate sentence of 8-20 years concurrent to each other on  
4 this case and the other case and understand the State may argue for more than that  
5 stipulated sentence. Is that your understanding of the negotiations?  
6 THE DEFENDANT: Yes, Your Honor.  
7 THE COURT: Ma'am, what is your full name?  
8 THE DEFENDANT: April M. Parks.  
9 THE COURT: And how old are you?  
10 THE DEFENDANT: 53.  
11 THE COURT: How far did you go in school?  
12 THE DEFENDANT: Some college.  
13 THE COURT: Do you read, write and understand the English language?  
14 THE DEFENDANT: I do.  
15 THE COURT: Ma'am, are you currently under the influence of any drugs or  
16 medication, alcoholic beverages at this time?  
17 THE DEFENDANT: I'm sorry.  
18 THE COURT: Are you under the influence right now of any drugs, medication  
19 or alcoholic beverages?  
20 THE DEFENDANT: No, ma'am.  
21 THE COURT: Do you understand the proceedings that are happening here  
22 today?  
23 THE DEFENDANT: I do, Your Honor.  
24 THE COURT: Have you received a copy of the amended indictment in Case  
25 C321808 where you were charged with the two counts of exploitation of an older,

1 vulnerable person, two counts of theft and one count of perjury?

2 THE DEFENDANT: Yes, ma'am.

3 THE COURT: Have you also received a copy of the amended indictment in  
4 C329886 where you are charged with one count of exploitation of an older,  
5 vulnerable person?

6 THE DEFENDANT: Yes, ma'am.

7 THE COURT: Do you understand all of those charges?

8 THE DEFENDANT: I do, Your Honor.

9 THE COURT: Ma'am, have you had an opportunity to discuss this case with  
10 your lawyer?

11 THE DEFENDANT: Yes.

12 THE COURT: As to the charges set forth in both of those amended  
13 indictments how do you plead?

14 THE DEFENDANT: Guilty via Alford.

15 THE COURT: Okay. Guilty pursuant to Alford in C321808?

16 THE DEFENDANT: Guilty via Alford.

17 THE COURT: And guilty pursuant to Alford in C329886?

18 THE DEFENDANT: Yes, Your Honor.

19 THE COURT: Are you making these pleas freely and voluntarily?

20 THE DEFENDANT: Yes, Your Honor.

21 THE COURT: Has anyone forced you or threatened you or anyone closely  
22 associated with you to get you to enter either of these pleas?

23 THE DEFENDANT: No, ma'am.

24 THE COURT: Has anyone made you any promises other than what is  
25 contained in the guilty plea agreements to get you to enter either of these pleas?

1 THE DEFENDANT: No, ma'am.

2 THE COURT: I have two guilty plea agreements before me. Did you read  
3 these documents?

4 THE DEFENDANT: I did.

5 THE COURT: Did you have an opportunity to discuss them with your lawyer  
6 Mr. Goldstein?

7 THE DEFENDANT: Yes, ma'am.

8 THE COURT: Was he available to answer any questions you had?

9 THE DEFENDANT: He was.

10 THE COURT: And did you understand everything contained in both of these  
11 documents?

12 THE DEFENDANT: Yes, ma'am.

13 THE COURT: And did you have any questions for the Court?

14 THE DEFENDANT: I do not.

15 THE COURT: Did you understand the constitutional rights you're giving up by  
16 entering these pleas?

17 THE DEFENDANT: I do.

18 THE COURT: Did you understand the appellate rights you're giving up by  
19 entering these pleas?

20 THE DEFENDANT: Yes, ma'am.

21 THE COURT: And are you a United States citizen?

22 THE DEFENDANT: I am.

23 THE COURT: And, ma'am, after you went over all of these things with Mr.  
24 Goldstein did you sign the guilty plea agreement in case C321808 on page 7?

25 THE DEFENDANT: Yes, ma'am.

1 THE COURT: Is that your signature right there?

2 THE DEFENDANT: That looks like it, yes.

3 THE COURT: And in case C329886 did you go over that as well with Mr.

4 Goldstein?

5 THE DEFENDANT: Yes, ma'am.

6 THE COURT: And then did you sign page 6?

7 THE DEFENDANT: Yes, ma'am.

8 THE COURT: And I'm showing you page 6, is that your signature?

9 THE DEFENDANT: Yes, it is.

10 THE COURT: So in regards to Case C321808 did you understand the

11 maximum punishment for each count of exploitation of an older or vulnerable person

12 is 2-20 years in the Nevada Department of Corrections?

13 THE DEFENDANT: Yes, ma'am.

14 THE COURT: Do you understand the maximum fine is up to \$10,000 per

15 count?

16 THE DEFENDANT: Yes, ma'am, I do.

17 THE COURT: Do you understand in regards to two counts of theft that you're

18 pleading guilty to in that case the maximum punishment you face is 1-10 years on

19 each count?

20 THE DEFENDANT: I do.

21 THE COURT: And do you understand it's up to a \$10,000 fine on each

22 count?

23 THE DEFENDANT: I do.

24 THE COURT: And do you understand regardless of Count - - of perjury the

25 maximum punishment for perjury is 1-4 years in the Nevada Department of



1 Corrections and a fine of up to \$5000.

2 THE DEFENDANT: I understand that.

3 THE COURT: Do you understand on Case C329886 where you're pleading  
4 guilty to one count of exploitation of an older or vulnerable person the maximum  
5 punishment you face for that is 2-20 years in the Nevada Department of Corrections  
6 and a fine of up to \$10,000?

7 THE DEFENDANT: Yes, ma'am.

8 THE COURT: You understand that these are probationable offenses but no  
9 one can promise you probation, leniency or any special treatment as sentencing is  
10 strictly up to me?

11 THE DEFENDANT: Yes, ma'am.

12 THE COURT: No one can promise you whether or not these counts will run  
13 consecutive or concurrent to each other as that is a decision that will also be made  
14 by me?

15 THE DEFENDANT: Yes, ma'am.

16 THE COURT: Ma'am, since this is an Alford plea what facts - - I'm going to  
17 ask the State what facts they would have proven in Case C321808 had this matter  
18 have gone to trial?

19 MR. RAMAN: Judge, in that case C321808 had we had gone to trial the State  
20 would have proven beyond a reasonable doubt that Defendant Parks owned and  
21 operated a private professional guardian, LLC., and acted as a criminal enterprise  
22 wherein numerous criminal offenses were committed between 2011 and 2016 here  
23 in Clark County to include racketeering, exploitation of older or vulnerable person,  
24 theft, offering false instrument for filing a record and perjury. The evidence would  
25 show that Private Professional Guardian, LLC., was run with the goal of maximizing

1 profits at the expense of the people they were charged with caring for. Intentionally  
2 regarding the duty to the protected person as guardian and fiduciary and the duty of  
3 honesty to the Court. A prior professional guardian in the racketeering consisted of  
4 several unique schemes that were reflected in the fraudulent billings and Court  
5 petitions filed under penalty of perjury.

6 First scheme was a multiple billing fraud. Defendant Parks, her codefendant  
7 Simmons would instruct their staff when conducting ward visits particularly to group  
8 homes or residential facilities which has multiple elderly people with people under  
9 guardianship within their company to engage in multiple billing. This scheme netted  
10 the defendants \$100,262.25 in illegal proceeds victimizing 27 elderly and vulnerable  
11 people.

12 The next was a provision of the unnecessary services. Defendants Parks and  
13 Simmons intentionally inflated their billings to enrich themselves having staff provide  
14 unnecessary services billed at professional rates and to bill for services that could  
15 have been accomplished for free or by much less expensive means. That scheme  
16 netted the defendant \$60,593.78 in illegal proceeds victimizing 12 elderly and  
17 vulnerable people.

18 The next was the Christmas gift scam. The defendants Parks and Simmons  
19 intentionally profited from completely unnecessary unique scam where they  
20 purchased modest Christmas gifts such as popcorn, socks and other small presents.  
21 They then directed their staff to drive to these various protected persons' living  
22 facilities and drop off the small gifts. For the privilege of receiving the gifts which  
23 were never requested the protected persons were charged an hourly rate of over  
24 \$100 per hour. The scheme netted the defendants \$1507.50 in illegal proceeds  
25 victimizing 48 elderly and vulnerable people.

1       The next scam was the mortuary and toilet paper scam. One day in October  
2 of 2013 Parks' codefendant Gary Neil Taylor engaged in unique and multiple billing  
3 scam for his representations traveling to a local mortuary to pick up cremated  
4 remains of recently deceased clients and to drop off toilet paper to an assisted living  
5 facility wherein several protected persons lived. He billed more than \$1600 to these  
6 elderly and vulnerable persons. A few of whom had recently died. The scheme  
7 netted the defendants \$1405 in illegal proceeds victimizing 12 elderly, vulnerable  
8 and recently deceased people.

9       The next was the Court paperwork scam over a three year period where  
10 Private Professional Guardian, LLC., overcharged the protected persons by having  
11 codefendant Gary Neil Taylor take paperwork to the office of the family Court and  
12 stand in line to file documents. His billing rate for this service exceeded \$100 per  
13 hour. Private Professional Guardian, LLC., had Wiznet efilng account which  
14 allowed the defendant to file for free. This task could have been accomplished by  
15 much less costly manner through a legal runner service. However Parks liked to  
16 accomplish the task in the most expensive way possible to the detriment of the  
17 protected person's finances, a scheme netting the defendant \$74,229.90 in illegal  
18 proceeds victimizing 109 elderly and vulnerable people.

19       Then there was the bank deposit flat fee scam. Similar to the court paperwork  
20 scam Defendants Parks and Taylor overbilled a vast majority of their protected  
21 persons for simple tasks such as driving to the bank and depositing checks. In  
22 many instances the value of the deposit to the checks were considerably less than  
23 the fee being charged to make that deposit. This scheme netted the defendants  
24 \$67,775.00 in illegal proceeds victimizing nearly 130 elderly and vulnerable people.

25       Next was the social security scam and false accounting scam. Defendants

1 Parks and Simmons billed wards excessively when it came to preparing {inaudible}  
2 payee forms which normally take no longer than 15 minutes to fill. In addition clients  
3 were billed for office visits to government offices that either did not occur or were  
4 very brief. Scheme netted the defendants \$13044.00 in illegal proceeds victimizing  
5 six elderly and vulnerable people.

6 Then there was the Barbara Neely theft and exploitation. Defendant's Parks  
7 and Simmons billed \$5300.20 in full and final fees to guardianship services to  
8 Barbara Neely case. In truth they removed \$6196.00 from her guardianship  
9 account. Defendant Parks and Simmons thereby paid themselves an additional  
10 \$895 without explanation or justification. At no point did she inform the Court she  
11 took the additional funds netting them the additional \$895.90 and victimizing Ms.  
12 Neely who was elderly and vulnerable.

13 The next was the theft from the estate of William Qualen. Defendant Parks  
14 was granted guardianship two days before he died. Despite his death the defendant  
15 transferred the entire contents of his bank account, \$4800.61, into a guardianship  
16 account netting the defendant the net of those entire proceeds.

17 Then there is the Ruth Blaslo theft and exploitation scam. Defendants Parks  
18 and Simmons utilized various billing scams mentioned previously to exploit her. A  
19 few unique aspects of her exploitation include auction of contents of her homes. A  
20 service which a private company completely handled but in which Parks and  
21 Simmons billed for. Additionally Blaslo was excessively billed for home checks  
22 when her house was worth less than the amount owed thereby rendering no value  
23 to Ms. Blaslo. Scheme netted the defendant \$13,180.67 in illegal proceeds  
24 victimizing Ms. Blaslo who was an elderly person.

25 Then there was the Audrey Weber theft from the estate. Defendants Parks

1 and Simmons by the same means as discussed above. In this particular case Parks  
2 codefendant calculated how many fraudulent billings for services were needed to  
3 drain the account after death, and it was unique due to handwritten notes that were  
4 found on paperwork squares, the balance of the account divided by the hourly fee  
5 subtracting how much was needed to bill. In that scheme \$3800 was taken from Ms.  
6 Weber who was an elderly person.

7       Then there was Mary Woods. In this particular case defendant Parks and  
8 former codefendant Noel Palmer Simpson were involved in an illegal change of  
9 beneficiary without Court permission on a life insurance policy held by Mary Woods,  
10 who was a protected person under guardianship. Evidence would show that Ms.  
11 Parks and Simmons possessed a copy of Woods' handwritten will in which Woods  
12 specifically gave instructions for the distribution of her assets. Parks and Simmons  
13 disregarded Woods' will in order to obtain professional fees. Defendant Parks with  
14 her knowledge and help of Simpson changed the beneficiary from John and Sally  
15 Denton, who were friends of Ms. Woods, to the estate of Mary Woods. The  
16 insurance payout was never a guardianship asset and they did it without Court  
17 permission. Upon Ms. Mary Woods' death the \$25,000 life insurance policy issued  
18 a check to the estate which created unnecessary probate for the purpose of collecting  
19 payments which defendant Simpson illegally billed for. Scheme unlawfully diverted  
20 \$25,278.57 from their lawful recipients victimizing John and Sue Denton and  
21 disturbing the wishes of Mary Woods, an elderly person and her estate.

22       And there was the Baxter Burns fraudulently obtained guardianship and theft  
23 from his estate. Baxter Burns, in that particular case Ms. Parks became aware after  
24 a relative was a designated trustee of his trust Parks disregarded the existence of  
25 the relative trustee and ultimately lied to the Court in these facts which Parks to

1 obtain control of his trust and remove assets from the trust which was a non  
2 guardianship asset. Scheme netted the defendant \$32,006.72 in illegal proceeds  
3 victimizing Mr. Burns and his estate.

4 Then there was Dorothy Trumpett who was fraudulently obtained similar to  
5 Baxter Burns. Defendant Parks and Simmons knew of her estate plan and that a  
6 relative had care plans for Trumpett. Defendant Parks and Simmons held this  
7 information from the Court when applying for guardianship and converted her assets  
8 without authority. Scheme allowed the defendants to access and move \$167,204.49  
9 in illegal proceeds to pay herself and attorney excessive fees on the guardianship  
10 thereby victimizing Ms. Trumpett.

11 And then finally there are perjury and offering false instrument for filing or  
12 record scheme where Defendant Parks and Simmons filed petitions and  
13 accountings with the 8<sup>th</sup> Judicial Family Court specifically 73 false documents and  
14 117 statements of perjury in order to perpetrate a scheme of fraud to exploit elderly  
15 and vulnerable adults under guardianship.

16 THE COURT: Okay. And, State, in regards to case C329886, what facts  
17 would you have proven if this case had gone to trial.

18 MR. WESTMEYER: Your Honor, if this case had gone to trial the State would  
19 have proven beyond a reasonable doubt that the Defendant April Parks owned and  
20 operated Private Professional Gaurdian, LLC., in collaboration with her  
21 codefendants Noel Palmer Simpson and Mark Simmons. Parks obtained  
22 guardianship over Beverly Flarety, an elderly person with dementia at the request of  
23 her codefendant James Thomas Melton in July 2011. Ms. Parks failed to disclose to  
24 the Court that her codefendant Mr. Simmons provided the physician's statement,  
25 necessary for the guardianship, was an also an employee of a private professional

1 guardian. Parkes and her codefendants fraudulently filed guardianship with the  
2 family Court over the course of several months in order to obtain control of the  
3 protected person's estate. Parks fraudulently billed for guardianship services even  
4 after Flarety's death without notifying the Court. The services rendered to Flarety  
5 were solely for the purpose of enriching a private professional guardian and not for  
6 the benefit of the protected person, and this was done in the amount and theories  
7 specified in the amended indictment.

8 THE COURT: Okay. And, ma'am, you understand the Court is going to rely  
9 on those facts just stated in determining that there is a factual basis for this plea.  
10 You've made a determination that it is in your best interest to accept these plea  
11 negotiations and enter this formal guilty plea agreement. Is that correct?

12 THE DEFENDANT: Yes.

13 THE COURT: And one of the reasons you decided to do this is to avoid the  
14 possible harsher penalty if you were convicted of the original charges at trial?

15 THE DEFENDANT: Yes, ma'am.

16 THE COURT: Ma'am, do you have any questions you would like to ask me or  
17 your attorney Mr. Goldstein before I accept the plea in C321808?

18 THE DEFENDANT: No.

19 THE COURT: Do you have any questions you would like to ask me or Mr.  
20 Goldstein before I accept the plea in C329886?

21 THE DEFENDANT: No.

22 THE COURT: The Court finds defendant's plea is freely and voluntarily made.  
23 The defendant understands the nature of the offense, the consequences of her plea  
24 and accepts this plea of guilty.

25 Is this plea contingent on the other defendants?

1 MR. RAMAN: It is.

2 MR. GOLDSTEIN: That's not set forth explicitly in the GPAs but my  
3 understanding it is contingent though it's not - -

4 THE COURT: Is it contingent on their plea of guilty or contingent upon them  
5 going forward with sentencing.

6 MR. WESTMEYER: On their pleas of guilty.

7 THE COURT: This matter is going to refer to the Division of Probation for  
8 presentence investigation report. Is this the type of situation where we're going to  
9 need a special sentencing setting?

10 MR. RAMAN: It might be, Judge. There could be - -

11 THE COURT: Because I'm assuming you guys have numerous victim  
12 speakers so I don't want this done in the middle of the calendar and you guys have  
13 to wait or we have a calendar that runs until 2:00. I'll give you guys your own  
14 setting.

15 MR. RAMAN: A Friday would be appropriate.

16 THE COURT: Is everybody okay with that?

17 MR. GOLDSTEIN: Court's pleasure.

18 THE COURT: So we're going to go into January for sentencing. Do you guys  
19 want to do it on the 4<sup>th</sup>? Are you guys available on the 4<sup>th</sup>?

20 MR. WESTMEYER: I believe so.

21 MR. RAMAN: Yes, Judge.

22 MR. GOLDSTEIN: Yes, Your Honor.

23 THE COURT: Ms. Border.

24 MS. BORDER: Yes, Your Honor.

25 THE COURT: Let me just make sure that I'm here. We're going to set



1 sentencing on this on the 4<sup>th</sup> at 9 o'clock in the morning.

2 THE COURT: January 4<sup>th</sup> at 9:00 a.m.

3 Ms. Parks, you can have a seat.

4

5 (Proceedings concluded at 9:43 a.m.)

6

7

8 ATTEST: I do hereby certify that I have truly and correctly transcribed the  
9 audio/video proceedings in the above-entitled case to the best of my ability.

10

11

12

13 *Victoria W. Boyd*

07-31-2020

14

15 Victoria W. Boyd  
16 Court Recorder/Transcriber

Date

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● ORIGINAL ●

FILED IN OPEN COURT  
STEVEN D. GRIERSON  
CLERK OF THE COURT

NOV 05 2018

BY:   
TERI BERKSHIRE, DEPUTY

C-17-321808-1  
AIND  
Amended Indictment  
4794078



1 AIND  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 JAY P. RAMAN  
6 Chief Deputy District Attorney  
7 Nevada Bar #010193  
8 ADAM P. LAXALT  
9 Nevada Attorney General  
10 Nevada Bar #012426  
11 DANIEL E. WESTMEYER  
12 Senior Deputy Attorney General  
13 Nevada Bar #010273  
14 200 Lewis Avenue  
15 Las Vegas, NV 89155-2212  
16 (702) 671-2500  
17 Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,  
13 Plaintiff,

14 -vs-

15 APRIL PARKS,  
16 #1571645

17 Defendant.

CASE NO. C-17-321808-1

DEPT NO. X

AMENDED  
INDICTMENT

18 STATE OF NEVADA }  
19 COUNTY OF CLARK } ss:

20 The Defendant(s) above named, APRIL PARKS, is accused by the Clark County Grand  
21 Jury of the crime of **EXPLOITATION OF AN OLDER/VULNERABLE PERSON**  
22 **(Category B Felony - NRS 200.5092, 200.5099 - NOC 50304); THEFT (Category B Felony**  
23 **- NRS 205.0832, 205.0835.4 - NOC 55991) and PERJURY (Category D Felony - NRS**  
24 **199.120 - NOC 52971), committed at and within the County of Clark, State of Nevada, on or**  
25 **between December 21, 2011 and July 6, 2016, as follows:**

26 COUNT 1 - EXPLOITATION OF AN OLDER/VULNERABLE PERSON

27 Defendant did willfully, unlawfully, and feloniously exploit an older person by use of  
28 a guardianship converting the older person's money, assets, or property, Defendant intending

1 to permanently deprive the older person of the ownership, use, benefit, or possession of the  
2 older person's money, assets, or property having an value of more than \$5,000.00, while  
3 working in her role as guardian and fiduciary, by overbilling for visits, social security visits,  
4 shopping trips, court filings, and banking visits, and/or by billing for unnecessary services or  
5 services not performed, thereby exploiting older persons in the amount of approximately  
6 \$55,215.45. Said older persons are as follows:

<b>Name of Exploited Elder</b>	<b>Amount Exploited</b>
Clyde Bowman	\$3,820.14
Delmond Foster	\$5,134.40
Delores Smith	\$6,346.30
Harold Lockwood	\$4,528.00
James Poya	\$6,032.50
Janice Mitchell	\$4,766.37
Juanita Graham	\$5,766.75
Marlene Homer	\$11,582.40
Mary Vitek	\$2,705.39
Norbert Wilkening	\$4,533.20
	<b>TOTAL: \$55,215.45</b>

20 Defendant is criminally liable under one or more of the following principles of criminal  
21 liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
22 commission of this crime, with the intent that this crime be committed, by providing counsel  
23 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted  
24 as guardian for said older person and overcharged for ward visits, shopping trips, bank  
25 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did  
26 not benefit said older person or did not occur, and/or directed Angelica Sanchez and/or Heidi  
27 Kramer and/or Sue Pehrson and/or MARK SIMMONS and/or GARY NEAL TAYLOR to do  
28 //

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

3 COUNT 2 - EXPLOITATION OF AN OLDER PERSON

4 Defendant did willfully, unlawfully, and feloniously exploit an older person by use of  
5 a guardianship converting the older person's money, assets, or property, Defendant intending  
6 to permanently deprive the older person of the ownership, use, benefit, or possession of the  
7 older person's money, assets, or property having an value of more than \$5,000.00, by working  
8 in her role as guardian and fiduciary, overbilling for visits, social security visits, shopping  
9 trips, court filings, and banking visits, and/or by billing for unnecessary services or services  
10 not performed, thereby exploiting older persons in the amount of approximately \$208,292.00.  
11 Said older persons are as follows:

<b>Name of Exploited Elder</b>	<b>Amount Exploited</b>
Dorothy Trumbich	\$167,204.49
Adolfo Gonzalez	\$1,413.60
Carolyn Rickenbaugh	\$3,804.49
Gloria Schneringer	\$2,830.50
Kenneth Edwards	\$2,622.62
Roy Franklin	\$5,806.97
Marilyn Scholl	\$6,262.48
Marie Long	\$10,708.45
Rennie North	\$2,074.80
Patricia Smoak	\$5,563.60
	<b>TOTAL: \$208,292.00</b>

25  
26 Defendant is criminally liable under one or more of the following principles of criminal  
27 liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
28 commission of this crime, with the intent that this crime be committed, by providing counsel

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

8 COUNT 3 - THEFT

9 Defendant did willfully, knowingly, feloniously, and without lawful authority, use the  
10 services or property of another person entrusted to her, or placed in her possession for a limited,  
11 authorized period of determined or prescribed duration or for a limited use, having a value of  
12 \$3,500.00 or more, in the following manner, to-wit: by working in her role as guardian and  
13 fiduciary, overbilling for visits, social security visits, shopping trips, court filings, and banking  
14 visits, and/or by billing for unnecessary services or services not performed, thereby unlawfully  
15 converting money belonging to said older person in the amount of approximately \$69,032.32.  
16 Said older persons are as follows:

Name of Older Person	Amount Stolen
Rudy North	\$2,016.30
Ruth Braslow	\$13,180.67
Walter Wright	\$4,183.08
William Brady	\$9,470.80
William Flewellen	\$4,807.61
Yoshiko Kindaichi	\$3,699.28
Norman Weinstock	\$15,068.18
Maria Cooper	\$6,920.00
Kenneth Cristopherson	\$4,290.00
Joseph Massa	\$5,396.40

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	<b>TOTAL: \$69,032.32</b>
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Defendant is criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for said older person and overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit said older person or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson and/or MARK SIMMONS and/or GARY NEAL TAYLOR to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

**COUNT 4 - THEFT**

Defendant did willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to her, or placed in her possession for a limited, authorized period of determined or prescribed duration or for a limited use, having a value of \$3,500.00 or more, in the following manner, to-wit: by working in her role as guardian and fiduciary, overbilling for visits, social security visits, shopping trips, court filings, and banking visits, and/or by billing for unnecessary services or services not performed, thereby unlawfully converting money belonging to said older person in the amount of approximately \$85,210.86. Said older persons are as follows:

<b>Name of Older Person</b>	<b>Amount Stolen</b>
Blanca Ginorio	\$2,497.20
Daniel Currie	\$8,149.70
Rita Lamppa	\$4,311.20
Barbara Neely	\$895.00
Audrey Weber	\$3,819.60

1	Baxter Burns	\$32,006.72
2	Linda Phillips	\$3,445.26
3	William Flewellen	\$4,807.61
4	Mary Woods and/or John and Sally Den	\$25,278.57
5		<b>TOTAL: \$85,210.86</b>

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

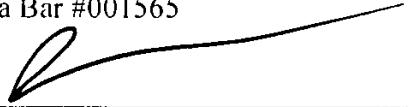
17 COUNT 5 - PERJURY

18 Defendant did willfully make a false statement in a declaration made under penalty of  
19 perjury, to-wit: by offering for filing with the Clark County District Court, under penalty of  
20 perjury, petitions for accounting and/or fees and/or related documents in the following  
21 guardianship cases: G-12-036900-A; G-11-036043-A; G-13-038228-A; G-14-040726-A; G-  
22 10-035162-A; G-10-035339-A; G-10-035078-A; G-13-038909-A; G-13-039636-A; G-09-  
23 034019-A; G-11-035593-A; G-12-037215-A; G-13-039449-A; G-13-039443-A; 06G029707;  
24 G-12-037404-A; G-13-039161-A; G-13-039448-A; G-11-036232-A; G-13-039145-A; G-14-  
25 039910-A; G-10-035166-A; G-14-041060-A; G-14-040243-A; G-12-038107-A; G-14-  
26 040310-A; G-12-037395-A; G-12-037438-A; G-13-039133-A; G-13-039132-A; G-12-  
27 037193-A; G-13-038438-A; G-13-038316-A; G-13-039454-A; G-08-032515-A; G-12-  
28 037226-A; and G-14-040873-A; which documents claimed that Defendant was owed fees for


1 services rendered that were not in fact rendered to the extent and duration claimed, which  
2 statements were material to the filings in question.

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

6 BY

  
7 JAY P. RAMAN  
Chief Deputy District Attorney  
8 Nevada Bar #010193

9  
10 ADAM P. LAXALT  
Nevada Attorney General  
11 Nevada Bar #012426

  
13 DANIEL WESTMEYER  
14 Senior Deputy Attorney General  
15 Nevada Bar #010273  
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• **ORIGINAL** •

FILED IN OPEN COURT  
STEVEN D. GRIERSON  
CLERK OF THE COURT

NOV 05 2018

BY:   
TERI BERKSHIRE, DEPUTY

C-17-321808-1  
GPA  
Guilty Plea Agreement  
4794095



1 **GPA**

2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 JAY P. RAMAN  
6 Chief Deputy District Attorney  
7 Nevada Bar #010193  
8 ADAM P. LAXALT  
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16 (702) 671-2500  
17 Attorney for Plaintiff

10 DISTRICT COURT  
11 CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,  
13 Plaintiff,

14 -vs-

15 APRIL PARKS,  
16 #1571645

17 Defendant.

CASE NO: C-17-321808-1

DEPT NO: X

18 GUILTY PLEA AGREEMENT

19 I hereby agree to plead guilty, pursuant to North Carolina v. Alford, 400 U.S. 25 (1970),  
20 to: **2 COUNTS OF EXPLOITATION OF AN OLDER/VULNERABLE PERSON**  
21 **(Category B Felony - NRS 200.5092, 200.5099 - NOC 50304), 2 COUNTS OF THEFT**  
22 **(Category B Felony - NRS 205.0832, 205.0835.4 - NOC 55991), and 1 COUNT OF**  
23 **PERJURY (Category D Felony - NRS 199.120 - NOC 52971),** as more fully alleged in the  
24 charging document attached hereto as Exhibit "1".

25 I hereby also agree to plead guilty, pursuant to North Carolina v. Alford, 400 U.S. 25  
26 (1970), to: **1 COUNT OF EXPLOITATION OF AN OLDER/VULNERABLE PERSON**  
27 **(Category B Felony - NRS 200.5092, 200.5099 - NOC 50304),** in Case No. C329886.

28 //

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AA 0375

15

1 My decision to plead guilty by way of the Alford decision is based upon the plea  
2 agreement in this case which is as follows:

3 I agree to pay full restitution in an amount of \$559,205.32, jointly and severally between  
4 myself, Mark Simmons, and Gary Neil Taylor. The State and Defendant will retain full right  
5 to argue. The instant case shall run concurrent to Case No. C329886. I reject a stipulated  
6 aggregate sentence of eight (8) to twenty (20) years concurrent to each other on this case and  
7 Case No. C329886, and understand the State may argue for more than that stipulated sentence.

8 I agree to the forfeiture of any and all weapons or any interest in any weapons seized  
9 and/or impounded in connection with the instant case and/or any other case negotiated in  
10 whole or in part in conjunction with this plea agreement.

11 I understand and agree that, if I fail to interview with the Department of Parole and  
12 Probation (P&P), fail to appear at any subsequent hearings in this case, or an independent  
13 magistrate, by affidavit review, confirms probable cause against me for new criminal charges  
14 including reckless driving or DUI, but excluding minor traffic violations, the State will have  
15 the unqualified right to argue for any legal sentence and term of confinement allowable for the  
16 crime(s) to which I am pleading guilty, including the use of any prior convictions I may have  
17 to increase my sentence as an habitual criminal to five (5) to twenty (20) years, Life without  
18 the possibility of parole, Life with the possibility of parole after ten (10) years, or a definite  
19 twenty-five (25) year term with the possibility of parole after ten (10) years.

20 Otherwise I am entitled to receive the benefits of these negotiations as stated in this  
21 plea agreement.

#### 22 CONSEQUENCES OF THE PLEA

23 By pleading guilty pursuant to the Alford decision, it is my desire to avoid the  
24 possibility of being convicted of more offenses or of a greater offense if I were to proceed to  
25 trial on the original charge(s) and of also receiving a greater penalty. I understand that my  
26 decision to plead guilty by way of the Alford decision does not require me to admit guilt, but  
27 is based upon my belief that the State would present sufficient evidence at trial that a jury

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1 would return a verdict of guilty of a greater offense or of more offenses than that to which I  
2 am pleading guilty.

3 I understand that by pleading guilty I admit the facts which support all the elements of  
4 the offense(s) to which I now plead as set forth in Exhibit "1".

5 As to **Counts 1 and 2**, I understand that as a consequence of my plea of guilty by way  
6 of the Alford decision The Court must sentence me to imprisonment in the Nevada Department  
7 of Corrections for a minimum term of not less than two (2) years and a maximum term of not  
8 more than twenty (20) years. The minimum term of imprisonment may not exceed forty  
9 percent (40%) of the maximum term of imprisonment. I understand that I may also be fined  
10 up to \$10,000.00.

11 As to **Counts 3 and 4**, I understand that as a consequence of my plea of guilty by way  
12 of the Alford decision The Court must sentence me to imprisonment in the Nevada Department  
13 of Corrections for a minimum term of not less than one (1) year and a maximum term of not  
14 more than ten (10) years. The minimum term of imprisonment may not exceed forty percent  
15 (40%) of the maximum term of imprisonment. I understand that I may also be fined up to  
16 \$10,000.00.

17 As to **Count 5**, I understand that as a consequence of my plea of guilty by way of the  
18 Alford decision The Court must sentence me to imprisonment in the Nevada Department of  
19 Corrections for a minimum term of not less than one (1) year and a maximum term of not more  
20 than four (4) years. The minimum term of imprisonment may not exceed forty percent (40%)  
21 of the maximum term of imprisonment. I understand that I may also be fined up to \$5,000.00.

22 I understand that the law requires me to pay an Administrative Assessment Fee.

23 I understand that, if appropriate, I will be ordered to make restitution to the victim of  
24 the offense(s) to which I am pleading guilty and to the victim of any related offense which is  
25 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to  
26 reimburse the State of Nevada for any expenses related to my extradition, if any.

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1 I understand that I am eligible for probation for the offenses to which I am pleading  
2 guilty. I understand that, except as otherwise provided by statute, the question of whether I  
3 receive probation is in the discretion of the sentencing judge.

4 I understand that I must submit to blood and/or saliva tests under the Direction of the  
5 Division of Parole and Probation to determine genetic markers and/or secretor status.

6 I understand that if I am pleading guilty to charges of Burglary, Invasion of the Home,  
7 Possession of a Controlled Substance with Intent to Sell, Sale of a Controlled Substance, or  
8 Gaming Crimes, for which I have prior felony conviction(s), I will not be eligible for probation  
9 and may receive a higher sentencing range.

10 I understand that if more than one sentence of imprisonment is imposed and I am  
11 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order  
12 the sentences served concurrently or consecutively.

13 I understand that information regarding charges not filed, dismissed charges, or charges  
14 to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

15 I have not been promised or guaranteed any particular sentence by anyone. I know that  
16 my sentence is to be determined by the Court within the limits prescribed by statute.

17 I understand that if my attorney or the State of Nevada or both recommend any specific  
18 punishment to the Court, the Court is not obligated to accept the recommendation.

19 I understand that if the offense(s) to which I am pleading guilty was committed while I  
20 was incarcerated on another charge or while I was on probation or parole that I am not eligible  
21 for credit for time served toward the instant offense(s).

22 I understand that if I am not a United States citizen, any criminal conviction will likely  
23 result in serious negative immigration consequences including but not limited to:

- 24 1. The removal from the United States through deportation;
- 25 2. An inability to reenter the United States;
- 26 3. The inability to gain United States citizenship or legal residency;

27 //

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4. An inability to renew and/or retain any legal residency status; and/or
5. An indeterminate term of confinement, with the United States Federal Government based on my conviction and immigration status.

Regardless of what I have been told by any attorney, no one can promise me that this conviction will not result in negative immigration consequences and/or impact my ability to become a United States citizen and/or a legal resident.

I understand that P&P will prepare a report for the sentencing judge prior to sentencing. This report will include matters relevant to the issue of sentencing, including my criminal history. This report may contain hearsay information regarding my background and criminal history. My attorney and I will each have the opportunity to comment on the information contained in the report at the time of sentencing. Unless the District Attorney has specifically agreed otherwise, then the District Attorney may also comment on this report.

#### WAIVER OF RIGHTS

By entering my plea of guilty, I understand that I am waiving and forever giving up the following rights and privileges:

1. The constitutional privilege against self-incrimination, including the right to refuse to testify at trial, in which event the prosecution would not be allowed to comment to the jury about my refusal to testify.
2. The constitutional right to a speedy and public trial by an impartial jury, free of excessive pretrial publicity prejudicial to the defense, at which trial I would be entitled to the assistance of an attorney, either appointed or retained. At trial the State would bear the burden of proving beyond a reasonable doubt each element of the offense(s) charged.
3. The constitutional right to confront and cross-examine any witnesses who would testify against me.
4. The constitutional right to subpoena witnesses to testify on my behalf.
5. The constitutional right to testify in my own defense.
6. The right to appeal the conviction with the assistance of an attorney, either appointed or retained, unless specifically reserved in writing and agreed upon as provided in NRS 174.035(3). I understand this means I am unconditionally waiving my right to a direct appeal of this conviction, including any challenge based upon reasonable constitutional, jurisdictional or other grounds that challenge the legality of the proceedings as stated in NRS 177.015(4). However, I remain free to challenge my conviction through other post-conviction remedies including a habeas corpus petition pursuant to NRS Chapter 34.

VOLUNTARINESS OF PLEA

I have discussed the elements of all of the original charge(s) against me with my attorney and I understand the nature of the charge(s) against me.

I understand that the State would have to prove each element of the charge(s) against me at trial.

I have discussed with my attorney any possible defenses, defense strategies and circumstances which might be in my favor.

All of the foregoing elements, consequences, rights, and waiver of rights have been thoroughly explained to me by my attorney.

I believe that pleading guilty and accepting this plea bargain is in my best interest, and that a trial would be contrary to my best interest.

I am signing this agreement voluntarily, after consultation with my attorney, and I am not acting under duress or coercion or by virtue of any promises of leniency, except for those set forth in this agreement.

I am not now under the influence of any intoxicating liquor, a controlled substance or other drug which would in any manner impair my ability to comprehend or understand this agreement or the proceedings surrounding my entry of this plea.

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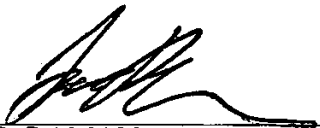
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1 My attorney has answered all my questions regarding this guilty plea agreement and its  
2 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

3 DATED this 5<sup>th</sup> day of November, 2018.

4  
5   
6 APRIL PARKS  
Defendant \

7 AGREED TO BY:

8   
9  
10 JAY P. RAMAN  
11 Chief Deputy District Attorney  
Nevada Bar #010193

12   
13 DANIEL WESTMEYER  
14 Senior Deputy Attorney General  
15 Nevada Bar #010273  
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1 CERTIFICATE OF COUNSEL:

2 I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court  
3 hereby certify that:

- 4 1. I have fully explained to the Defendant the allegations contained in the  
5 charge(s) to which Alford pleas are being entered.
- 6 2. I have advised the Defendant of the penalties for each charge and the restitution  
7 that the Defendant may be ordered to pay.
- 8 3. I have inquired of Defendant facts concerning Defendant's immigration status  
9 and explained to Defendant that if Defendant is not a United States citizen any  
10 criminal conviction will most likely result in serious negative immigration  
11 consequences including but not limited to:
- 12 a. The removal from the United States through deportation;
  - 13 b. An inability to reenter the United States;
  - 14 c. The inability to gain United States citizenship or legal residency;
  - 15 d. An inability to renew and/or retain any legal residency status; and/or
  - 16 e. An indeterminate term of confinement, by with United States Federal  
17 Government based on the conviction and immigration status.

18 Moreover, I have explained that regardless of what Defendant may have been  
19 told by any attorney, no one can promise Defendant that this conviction will not  
20 result in negative immigration consequences and/or impact Defendant's ability  
21 to become a United States citizen and/or legal resident.

- 22 4. All pleas of Alford offered by the Defendant pursuant to this agreement are  
23 consistent with the facts known to me and are made with my advice to the  
24 Defendant.
- 25 5. To the best of my knowledge and belief, the Defendant:
- 26 a. Is competent and understands the charges and the consequences of  
27 pleading Alford as provided in this agreement,
  - 28 b. Executed this agreement and will enter all Alford pleas pursuant hereto  
voluntarily, and
  - c. Was not under the influence of intoxicating liquor, a controlled  
substance or other drug at the time I consulted with the Defendant as  
certified in paragraphs 1 and 2 above.

Dated: This 5<sup>th</sup> day of November, 2018.

  
DEFENSE ATTY. NAME

16AGJ151A/mc/EAU



1 **AIND**

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

5 JAY P. RAMAN  
6 Chief Deputy District Attorney  
7 Nevada Bar #010193

8 ADAM P. LAXALT  
9 Nevada Attorney General  
10 Nevada Bar #012426

11 DANIEL E. WESTMEYER  
12 Senior Deputy Attorney General  
13 Nevada Bar #010273

14 200 Lewis Avenue  
15 Las Vegas, NV 89155-2212  
16 (702) 671-2500

17 Attorney for Plaintiff

10 DISTRICT COURT  
11 CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,

13 Plaintiff,

14 -vs-

15 APRIL PARKS,  
16 #1571645

17 Defendant.

CASE NO. C-17-321808-1

DEPT NO. X

AMENDED  
INDICTMENT

18 STATE OF NEVADA }  
19 COUNTY OF CLARK } ss:

20 The Defendant(s) above named, APRIL PARKS, is accused by the Clark County Grand  
21 Jury of the crime of **EXPLOITATION OF AN OLDER/VULNERABLE PERSON**  
22 **(Category B Felony - NRS 200.5092, 200.5099 - NOC 50304); THEFT (Category B Felony**  
23 **- NRS 205.0832, 205.0835.4 - NOC 55991) and PERJURY (Category D Felony - NRS**  
24 **199.120 - NOC 52971), committed at and within the County of Clark, State of Nevada, on or**  
25 **between December 21, 2011 and July 6, 2016, as follows:**

26 COUNT 1 - EXPLOITATION OF AN OLDER/VULNERABLE PERSON

27 Defendant did willfully, unlawfully, and feloniously exploit an older person by use of  
28 a guardianship converting the older person's money, assets, or property, Defendant intending

**EXHIBIT "1"**

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1 to permanently deprive the older person of the ownership, use, benefit, or possession of the  
2 older person's money, assets, or property having an value of more than \$5,000.00, while  
3 working in her role as guardian and fiduciary, by overbilling for visits, social security visits,  
4 shopping trips, court filings, and banking visits, and/or by billing for unnecessary services or  
5 services not performed, thereby exploiting older persons in the amount of approximately  
6 \$55,215.45. Said older persons are as follows:

7

Name of Exploited Elder	Amount Exploited
Clyde Bowman	\$3,820.14
Delmond Foster	\$5,134.40
Delores Smith	\$6,346.30
Harold Lockwood	\$4,528.00
James Poya	\$6,032.50
Janice Mitchell	\$4,766.37
Juanita Graham	\$5,766.75
Marlene Homer	\$11,582.40
Mary Vitek	\$2,705.39
Norbert Wilkening	\$4,533.20
	<b>TOTAL: \$55,215.45</b>

19

20 Defendant is criminally liable under one or more of the following principles of criminal  
21 liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
22 commission of this crime, with the intent that this crime be committed, by providing counsel  
23 and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted  
24 as guardian for said older person and overcharged for ward visits, shopping trips, bank  
25 deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did  
26 not benefit said older person or did not occur, and/or directed Angelica Sanchez and/or Heidi  
27 Kramer and/or Sue Pehrson and/or MARK SIMMONS and/or GARY NEAL TAYLOR to do  
28 //

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

**COUNT 2 - EXPLOITATION OF AN OLDER PERSON**

Defendant did willfully, unlawfully, and feloniously exploit an older person by use of a guardianship converting the older person's money, assets, or property, Defendant intending to permanently deprive the older person of the ownership, use, benefit, or possession of the older person's money, assets, or property having an value of more than \$5,000.00, by working in her role as guardian and fiduciary, overbilling for visits, social security visits, shopping trips, court filings, and banking visits, and/or by billing for unnecessary services or services not performed, thereby exploiting older persons in the amount of approximately \$208,292.00. Said older persons are as follows:

Name of Exploited Elder	Amount Exploited
Dorothy Trumbich	\$167,204.49
Adolfo Gonzalez	\$1,413.60
Carolyn Rickenbaugh	\$3,804.49
Gloria Schneringer	\$2,830.50
Kenneth Edwards	\$2,622.62
Roy Franklin	\$5,806.97
Marilyn Scholl	\$6,262.48
Marie Long	\$10,708.45
Rennie North	\$2,074.80
Patricia Smoak	\$5,563.60
	<b>TOTAL: \$208,292.00</b>

Defendant is criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel

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

8 COUNT 3 - THEFT

9 Defendant did willfully, knowingly, feloniously, and without lawful authority, use the  
10 services or property of another person entrusted to her, or placed in her possession for a limited,  
11 authorized period of determined or prescribed duration or for a limited use, having a value of  
12 \$3,500.00 or more, in the following manner, to-wit: by working in her role as guardian and  
13 fiduciary, overbilling for visits, social security visits, shopping trips, court filings, and banking  
14 visits, and/or by billing for unnecessary services or services not performed, thereby unlawfully  
15 converting money belonging to said older person in the amount of approximately \$69,032.32.  
16 Said older persons are as follows:

17

<b>Name of Older Person</b>	<b>Amount Stolen</b>
Rudy North	\$2,016.30
Ruth Braslow	\$13,180.67
Walter Wright	\$4,183.08
William Brady	\$9,470.80
William Flewellen	\$4,807.61
Yoshiko Kindaichi	\$3,699.28
Norman Weinstock	\$15,068.18
Maria Cooper	\$6,920.00
Kenneth Cristopherson	\$4,290.00
Joseph Massa	\$5,396.40

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	<b>TOTAL: \$69,032.32</b>
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Defendant is criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for said older person and overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit said older person or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson and/or MARK SIMMONS and/or GARY NEAL TAYLOR to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

**COUNT 4 - THEFT**

Defendant did willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to her, or placed in her possession for a limited, authorized period of determined or prescribed duration or for a limited use, having a value of \$3,500.00 or more, in the following manner, to-wit: by working in her role as guardian and fiduciary, overbilling for visits, social security visits, shopping trips, court filings, and banking visits, and/or by billing for unnecessary services or services not performed, thereby unlawfully converting money belonging to said older person in the amount of approximately \$85,210.86. Said older persons are as follows:

<b>Name of Older Person</b>	<b>Amount Stolen</b>
Blanca Ginorio	\$2,497.20
Daniel Currie	\$8,149.70
Rita Lamppa	\$4,311.20
Barbara Neely	\$895.00
Audrey Weber	\$3,819.60

1	Baxter Burns	\$32,006.72
2	Linda Phillips	\$3,445.26
3	William Flewellen	\$4,807.61
4	Mary Woods and/or John and Sally Den	\$25,278.57
5		<b>TOTAL: \$85,210.86</b>

6

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

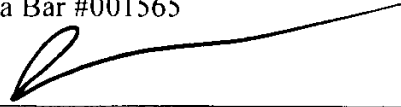
17 COUNT 5 - PERJURY

18 Defendant did willfully make a false statement in a declaration made under penalty of  
19 perjury, to-wit: by offering for filing with the Clark County District Court, under penalty of  
20 perjury, petitions for accounting and/or fees and/or related documents in the following  
21 guardianship cases: G-12-036900-A; G-11-036043-A; G-13-038228-A; G-14-040726-A; G-  
22 10-035162-A; G-10-035339-A; G-10-035078-A; G-13-038909-A; G-13-039636-A; G-09-  
23 034019-A; G-11-035593-A; G-12-037215-A; G-13-039449-A; G-13-039443-A; 06G029707;  
24 G-12-037404-A; G-13-039161-A; G-13-039448-A; G-11-036232-A; G-13-039145-A; G-14-  
25 039910-A; G-10-035166-A; G-14-041060-A; G-14-040243-A; G-12-038107-A; G-14-  
26 040310-A; G-12-037395-A; G-12-037438-A; G-13-039133-A; G-13-039132-A; G-12-  
27 037193-A; G-13-038438-A; G-13-038316-A; G-13-039454-A; G-08-032515-A; G-12-  
28 037226-A; and G-14-040873-A; which documents claimed that Defendant was owed fees for

1 services rendered that were not in fact rendered to the extent and duration claimed, which  
2 statements were material to the filings in question.

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

6 BY

  
7 JAY P. RAMAN  
Chief Deputy District Attorney  
8 Nevada Bar #010193

9  
10 ADAM P. LAXALT  
Nevada Attorney General  
11 Nevada Bar #012426



13 DANIEL WESTMEYER  
14 Senior Deputy Attorney General  
15 Nevada Bar #010273  
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27 16AGJ151A/mc/EAU  
28 LVMPD EV#1508192043  
(TK)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**November 05, 2018**

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C-17-321808-1      State of Nevada  
                                 vs  
                                 April Parks

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**November 05, 2018      8:30 AM**

**Status Check: Trial  
Readiness**

**HEARD BY:** Jones, Tierra

**COURTROOM:** RJC Courtroom 14B

**COURT CLERK:** Teri Berkshire

**RECORDER:** Victoria Boyd

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Goldstein, Anthony M.	Attorney
	Parks, April	Defendant
	Raman, Jay	Attorney
	State of Nevada	Plaintiff
	Westmeyer, Daniel	Attorney

**JOURNAL ENTRIES**

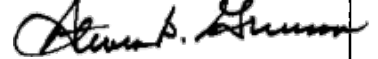
- Negotiations are as contained in the GUILTY PLEA AGREEMENT PURSUANT TO ALFORD DECISION FILED IN OPEN COURT. Court canvassed deft. on the AMENDED INDICTMENT FILED IN OPEN COURT, charging COUNT - 1 EXPLOITATION OF AN OLDER/VULNERABLE PERSON (F), COUNT - 2, EXPLOITATION OF AN OLDER/VULNERABLE PERSON (F), COUNT - 3 THEFT (F), COUNT - 4 THEFT (F), and COUNT - 5 PERJURY (F). Mr. Raman recited the facts. Deft. pled guilty pursuant to ALFORD DECISION. Court accepted plea and referred the matter to the Division of Parole and Probation for a presentencing report (PSI) and set for sentencing on the date given. FURTHER COURT ORDERED, trial date VACATED.

**CUSTODY**



01/04/19 9:00 A.M. SENTENCING

Clerk's Note: On 12-13-18, minutes amended to correct typographical error. /tb



1 **MEMO**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 JAY P. RAMAN  
6 Chief Deputy District Attorney  
7 Nevada Bar #010193  
8 ADAM P. LAXALT  
9 Nevada Attorney General  
10 Nevada Bar #012426  
11 DANIEL E. WESTMEYER  
12 Senior Deputy Attorney General  
13 Nevada Bar #010273  
14 Attorneys for Plaintiff

9 DISTRICT COURT  
10 CLARK COUNTY, NEVADA

11 THE STATE OF NEVADA, )  
12 Plaintiff, )

13 -vs- )

14 APRIL PARKS, )  
15 Defendant. )

CASE NO: C-17-321808-1

DEPT NO: X

17 **SENTENCING MEMORANDUM**

18 DATE OF HEARING: JANUARY 4, 2019  
19 TIME OF HEARING: 9:00 A.M.

20 COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, District Attorney,  
21 through JAY P. RAMAN, Chief Deputy District Attorney, and ADAM P. LAXALT, Nevada  
22 Attorney General, through DANIEL E. WESTMEYER, Senior Deputy Attorney General,  
23 hereby submits the attached Sentencing Memorandum.

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1 **POINTS AND AUTHORITIES**

2 **FACTUAL SUMMARY**

3 Defendants April Parks, Mark Simmons, and Gary Neal Taylor worked for A Private  
4 Professional Guardian, LLC, and ("APPG") and in the course of that enterprise committed  
5 numerous criminal numerous offenses constituting Racketeering, Exploitation of an Older or  
6 Vulnerable Person, Theft, Offering False Instrument for Filing or Record, and Perjury.  
7 Defendants April Parks and Mark Simmons worked as owner and office manager of a  
8 guardianship service, where through referrals from medical facilities and the court they would  
9 seek and obtain guardianship over elderly and vulnerable adults. Although there were  
10 legitimate guardianship activities happening at A Private Professional Guardian, LLC, Parks  
11 and Simmons engaged in a pattern of conduct which was illegal and exploitive to the  
12 vulnerable population. The evidence shows that A Private Professional Guardian, LLC was  
13 run as a criminal enterprise, with the goal of maximizing their profits at the expense of the  
14 people they were charged with caring for, intentionally disregarding the duty to the protected  
15 persons as a guardian and fiduciary, and the duty of honesty to the Court.

16 The Defendants engaged in a number of schemes designed to enrich themselves at the  
17 expense of the protected persons under their case. Defendants Parks and Simmons would  
18 instruct their staff that when conducting protected person visits, particularly to group-homes  
19 or residential facilities which housed multiple people under guardianship with their company,  
20 to multiple-bill. For example, if a caseworker visited a group-home which housed six protected  
21 persons, and the total trip took one hour of round trip travel, and one hour to visit – each of  
22 the six protected persons were billed for the entire two hour period individually, instead of  
23 pro-rating the travel and visit time. This scheme netted the Defendants \$120,062.25 in illegal  
24 proceeds, victimizing 27 elderly and vulnerable people.

25 Defendants Parks and Simmons intentionally inflated their billings to enrich themselves  
26 by having staff provide unnecessary services, and services which could have been  
27 accomplished by much less expensive means. Many of these examples are additionally  
28 shocking beyond their cost because Parks and Simmons billed flat fees for many of the

1 services, which therefore should not have been additionally charged. Some examples follow:  
2 On May 11, 2013, Defendant Parks billed Jacqueline Nosbisch a fee of \$90, related to her son  
3 asking Parks to pass along a happy mother's day message. On July 29, 2013, APPG billed the  
4 estate of Patricia Broadway fees of \$20.40 to receive a call reporting Broadway died, fees of  
5 \$24 to notify her sister of the death during a call, and fees of \$39.60 to notify her son of the  
6 death. On December 5, 2014, Parks and Simmons billed Kathy Godfrey a fee of \$56.10 for  
7 a phone call in which Parks explained that, due to a lack of funds, Godfrey had to find a  
8 cheaper hair stylist and would only receive \$75 allowance for a haircut, not the \$100 she  
9 requested - even though the price of the phone call was more than the extra \$25 she refused to  
10 give Godfrey. On May 14, 2014, Parks and Simmons billed Walter Wright a fee of \$75 to  
11 deposit a check for \$6.33; one week later, she billed him a fee of \$90 to drop off to his facility  
12 three bags of cough drops purchased at Target for \$12.99. On March 2, 2015, APPG billed  
13 James Hagen a fee of \$13.60 for a phone call in which he swore at Parks and threatened to  
14 "choke (her) to death." On April 20, 2015, Parks and Simmons billed Dorothy Lothman a fee  
15 of \$13.60 for a phone call Lothman made to request a cell phone; Parks told she her she did  
16 not have any money to buy one.

17 On a handful of occasions, deceased protected persons were billed for visits in verified  
18 accountings filed with the court under penalty of perjury. For example, Gerard Specksgoor  
19 died on March 6, 2013. He was billed \$150 for a visit that occurred on March 7, 2013 - the  
20 day after he died. The case worker's notes for the after-death visit stated that she spent 30  
21 minutes visiting with Specksgoor who "was not looking well;" she spent 15 minutes talking  
22 to staff about his condition, and it took her 30 minutes to travel to his facility for the visit. A  
23 few weeks later Specksgoor's estate was billed \$39.60 to "take wards clothes to be donated."

24 In addition to inflating their billings, Parks, Simmons, and their cohorts at A Private  
25 Professional Guardian performed "services" for their protected persons that were utterly  
26 unnecessary, and billed the protected persons for them. One example of unnecessary billings  
27 is Bernna Poe. On January 22, 2011, Parks billed her \$540 for 4.5 hours at a rate of \$120 to  
28 perform the following service at Parks's professional rate: "Travel to facility 25 min/Picked

1 up ward and took to lunch at Marie Calendars, went for a shampoo and cut at Fantastic Sams,  
2 went to McDonalds for a snack, went to 40 nails for a manicure, returned to facility.” On  
3 August 20, 2012, Poe was billed \$110.40 for a visit to a group home where 45 minutes was  
4 spent by Parks’s case manager “filing (her) nails.” Parks had previously used outside caregiver  
5 companies for similar services. These companies charge about \$20 per hour on average. In  
6 Poe’s case, she would have been billed around \$90 instead of \$540. In this scenario, Parks and  
7 Simmons profited \$450 by making the decision to have their case manager perform the service  
8 at their professional rates, instead of hiring a third-party to perform the task at a heavily  
9 reduced rate.

10 Around November 30, 2015, Parks and Simmons began filing notices with the court  
11 that Parks did not intend on becoming licensed in Nevada, and APPG was resigning from  
12 guardianship appointments. Parks did not have any replacement guardians for several of her  
13 protected persons. As a result, the court appointed the Clark County Public Guardian’s Office  
14 to be successor guardians to most of these protected persons. The court also appointed Legal  
15 Aid of Southern Nevada to represent some protected persons’ interests.

16 Parks’s statement in her filings seeking to resign her guardianship appointment because  
17 she did not intend to become licensed, seems to contrast with evidence in this case. According  
18 to text message exchanges with her employees in August 2015, Parks was preparing to  
19 increase APPG’s marketing in September 2015 to obtain more business. Months earlier she  
20 had secured a contract with a local hospital that agreed to have its medical staff and social  
21 workers at six local facilities refer patients to APPG. September 21, 2015 is the date search  
22 warrants were executed at Parks’s home and business.

23 Parks’s abrupt withdrawal caused delays and burdens in the Public Guardian’s Office  
24 regarding access to the accounts of protected persons, because APPG remained as the  
25 guardian/account holder. These delays caused routine bills, like nursing home rent, to go  
26 unpaid until the Public Guardian could access the protected persons’ funds through the  
27 issuance of court orders. Some higher functioning protected persons had no way of obtaining  
28 spending money, and faced eviction from their assisted living facilities.

1 The case managers and/or supervisors from the Public Guardian's Office could tell  
2 from their initial contacts with some of Parks's protected persons that their functioning was  
3 high. The Public Guardian's Office suspected these protected persons needed a less restrictive  
4 guardianship, or none at all. After the initial petitions contained information that these  
5 protected persons were diagnosed with dementia and unable to make any independent health  
6 or financial decisions, many were almost immediately evaluated again for their guardianship  
7 needs once the Public Guardian took over. As a result of the Public Guardian's involvement,  
8 several of APPG's former protected persons were found no longer to need guardianship, or  
9 needed only guardian of the estate and had their independence restored. In several of these  
10 cases, Parks had been guardian of their person and estate for five years or more when their  
11 civil rights were restored. However, at that point nearly all of their savings had been depleted  
12 by the payment of fees to Parks and Simmons.

13 Defendants Parks and Simmons intentionally profited from a completely unnecessary  
14 and unique scam, in which they purchased Christmas gifts such as popcorn, socks, and other  
15 small presents. They then had staff drive around to the various protected persons living  
16 facilities, and drop off the small gifts. For the privilege of receiving the gift, the protected  
17 persons were charged at the hourly rate of over \$100.00 per hour. This operation netted the  
18 Defendants \$1,507.50 in illegal proceeds, victimizing 48 elderly and vulnerable people.

19 On one single day in October 2013 Defendant Taylor engaged in a unique multiple-  
20 billing scam, at the behest of Parks and Simmons. For his representations of traveling to a  
21 local mortuary to pick up cremated remains and to drop off toilet paper to an assisted living  
22 facility where several protected persons lived, he billed more than \$1,600.00 to these elderly  
23 and vulnerable protected persons; a few had recently died. This scheme netted the Defendants  
24 \$1,405.20 in illegal proceeds, victimizing 12 elderly, vulnerable, and recently deceased  
25 people.

26 Over a three year period, APPG overcharged its protected persons by having Defendant  
27 Taylor take paperwork from the office to the Family Court and stand in line to file documents.  
28 In many cases, he would unnecessarily leave, and return later for certified copies. His billing

1 rate for this service exceeded \$100.00 per hour. While A Private Professional Guardian, LLC  
2 had a Wiznet E-filing account, Parks and Simmons elected to accomplish this task the most  
3 expensive way possible and to the detriment to their protected persons' finances. Additionally,  
4 this service could have been accomplished in a much less costly manner by a legal runner  
5 service, which was essentially the service Defendant Taylor was providing. This scheme  
6 netted the Defendants \$74,229.90 in illegal proceeds, victimizing 109 elderly and vulnerable  
7 people.

8 Similar to the court paperwork scheme, Defendants Parks and Taylor overbilled the  
9 vast majority of their wards for simple tasks such a driving to the bank and depositing checks.  
10 APPG's billing documentation shows a pattern of billing protected persons for thirty (30)  
11 minutes under the heading "Travel to Bank, Make Deposit." On some dates, as many as  
12 twenty-six (26) individuals were billed on the same day, for a total of thirteen (13) hours spent  
13 at the bank, making deposits. Most of the protected persons under APPG's care used banks  
14 which have a branch within five (5) minutes' travel time from APPG's office.

15 A review of the bank records indicates that the total amount of time between the deposit  
16 of the first check and the last check of the day was typically a matter of minutes, rather than  
17 hours. Parks and Simmons billed at their professional rates, either \$120 or \$150 per hour, for  
18 this service. Making these deposits in person was entirely unnecessary, because most of the  
19 protected persons' check could be submitted via direct deposit, thereby eliminating the need  
20 to make the trip to the bank in the first place. Indeed, Parks and Simmons had set up direct  
21 deposit for some of their protected persons, but chose to bill others instead. This scheme  
22 netted the Defendants \$67,775.70 in illegal proceeds, victimizing 130 elderly and vulnerable  
23 people.

24 Defendants Parks and Simmons billed protected persons excessively when it came to  
25 preparing representative payee forms, forms that should take no longer than 15 minutes to fill  
26 out. A representative payee is a person to whom social security benefits are paid in lieu of the  
27 actual beneficiary, usually a family member or friend, for those who are incapable of managing  
28 their income. The representative payee form is filled out and submitted to the Social Security

1 Administration, which then processes the form. Parks and Simmons billed multiple protected  
2 persons for travel time to the social security office, filling out and submitting the forms, and  
3 appointments at the office.

4 Parks's case management records indicate that she applied to be a representative payee  
5 for forty-four (44) protected persons, at times billing up to four hours to travel to the Social  
6 Security Administration office, and over four hours meeting with staff at that office. As a  
7 guardian, Parks was exempt from having to interview with social security staff, and could  
8 submit her applications by mail and drop off. Additionally, the office was approximately two  
9 (2) miles from APPG's office, which would not take four hours of travel time. This scheme  
10 netted the Defendants \$4,300.60 in illegal proceeds.

11 Defendants Parks and Simmons filed petitions and accountings with the Eighth Judicial  
12 District Family Court, specifically seventy-three (73) false documents and one-hundred  
13 seventeen (117) false statements made under penalty of perjury, in order to perpetrate a scheme  
14 of fraud to exploit elderly and vulnerable adults under guardianship. In each guardianship  
15 case, Parks and Simmons would file documents affirming the truth of all statements made in  
16 said documents, including the mandatory accountings. As noted extensively above, many of  
17 the accountings filed with the court contained statements that Parks and Simmons knew to be  
18 false.

19 Parks would frequently move protected persons from one facility to another, for reasons  
20 unrelated to the best interested of the protected person. For example, Parks moved a protected  
21 person out of the Lakeview Terrace facility, only because the administrator of that facility  
22 made a doctor's appointment for the protected person without Parks's knowledge or approval.  
23 Several other witnesses confirmed to state investigators that Parks acted as a bully who struck  
24 fear in the hearts of her clients, rather than as a compassionate caregiver.

25 Defendants Parks and Simmons had worked in guardianship for years prior to initiating  
26 the above-noted schemes. Parks became a Nationally Certified Guardian through the National  
27 Guardianship Association ("NGA") in 2006. The NGA is a nationally-recognized  
28 organization, comprised of guardians from across the country. The NGA sets standards the



standards for guardianship. The NGA Standards of Practice, first adopted in 2000 and revised in 2013, set forth guidelines for those who undertake guardianship. Defendant Parks was also the Secretary of the Nevada Guardianship Association (an affiliate of the NGA) from 2014 to 2015. As a member of the NGA and an officer of the Nevada Guardianship Association, Parks was intimately familiar with the standards applicable to guardianship.

## **ARGUMENT**

### **I. THE IMPACT ON THE VICTIMS OF PARKS'S ACTIONS MERITS THE MAXIMUM AMOUNT OF PUNISHMENT**

The Defendant's crimes have affected her victims in ways too numerous to count. Countless lives have been ruined by the Defendant, who enriched herself at the expense of those she was sworn to protect. The evidence in this case establishes that Defendants Parks and Simmons obtained \$559,205.32 by engaging in the fraudulent schemes outlined above. Many of the victims never needed guardianship in the first place. Examples are detailed below.

#### *Mary Woods*

Parks and Simmons, along with their attorney and co-defendant Simpson, were involved in the illegal change of beneficiary without court permission on a life insurance policy held by Mary Woods, a protected person under guardianship. Parks changed the beneficiary from John and Sally Denton, friends of Ms. Woods, to "the estate of Mary Woods." Upon Mary Woods's death, the \$25,000 life insurance policy issued a check to the estate, which created an unnecessary probate for the purpose of collecting payments. This scheme unlawfully diverted \$25,278.57 from the lawful recipients, victimizing John and Sue Denton, and disturbing the wishes of Mary woods, an elderly person, and her estate.

#### *Baxter Burns*

APPG gained guardianship of Baxter Burns on December 22, 2011. At the time Parks filed the guardianship petition, she was aware that Burns had previously executed a living trust document and nominated successor trustees, who were empowered to manage his affairs in the event of his incapacity. Parks was informed that the trustee was actively engaged in the

1 care of Burns during the weeks leading to the filing of the petition, and that the trustee had  
2 accessed funds belonging to Burns to care for his needs.

3 APPG made no effort to contact the trustee, despite having that person's contact  
4 information. Without authority of the court, Parks and Simmons removed assets from Burns'  
5 trust, which was a non-guardianship asset over which they had no authority. Parks then paid  
6 herself \$8,164 from the Burns estate, and paid her attorney and friend (and co-defendant)  
7 Simpson \$9,819.08 in legal fees from the Burns estate. This scheme netted the Defendants a  
8 total \$32,006.72 in illegal proceeds, victimizing Baxter Burns, and disturbing the wishes and  
9 estate planning of Baxter Burns, an elderly person. The guardianship lasted a total of twenty-  
10 six (26) days, as Burns passed away on January 16, 2012.

11 *Dorothy Trumbich*

12 Similar to the Baxter Burns case, Defendants Parks and Simmons knew of Dorothy  
13 Trumbich's estate plan, and hid the information from the court when applying for  
14 guardianship. The information known was that Trumbich had nominated her niece as the  
15 successor trustee as well as power of attorney, should she lose capacity. Parks and Simmons  
16 then converted the assets of Trumbich's trust (again, a non-guardianship asset) without court  
17 authority. This scheme allowed Parks to access and move \$167,204.49 in illegal proceeds, to  
18 pay herself and her attorney exorbitant fees on a guardianship, which likely never would have  
19 occurred in the absence of Defendants' meddling. This scheme victimized Dorothy Trumbich,  
20 disturbing the wishes and estate planning of Trumbich, an elderly person under APPG's care.

21 *Mary Litwin*

22 On August 24, 2010 Parks billed the estate of 89-year-old Mary Litwin \$240 to attend  
23 her funeral. Parks represented in her billing that she spent two hours at the funeral and billed  
24 a rate of \$120 an hour. By statute, guardianship over the person ends when a protected person  
25 dies. This obviously unnecessary billing only benefited Parks; the protected person was not  
26 even alive to benefit from the service. Parks and Simmons also routinely billed the estates of  
27 deceased protected persons between \$20 and \$50 to call relatives and inform them of the  
28

1 person's passing. The same fee was charged to learn via a phone call or fax that a protected  
2 persons had died at a facility.

3 *Barbara Neely*

4 Another tragic example is the Barbara Neely guardianship. In this case, Neely should  
5 have never been in a guardianship. Parks and Simmons delayed terminating the guardianship  
6 so they could bill fees to sell her home. Parks and Simmons also stole money beyond what  
7 they told the court was a full and final sum of guardianship fees. Parks was able to steal the  
8 money because as guardian, she had complete control over the woman's assets until she  
9 decided when to file with the court her signed order terminating her guardianship.

10 On September 23, 2014 Parks obtained temporary guardianship of Barbara Neely after  
11 receiving a referral through Boulder City Hospital. Her petition for general guardianship of  
12 Neely was filed on September 30, in which a hospital physician stated Neely suffered from a  
13 mental illness (schizophrenia) and required a guardian. The petition was approved on October  
14 24, 2014.

15 Investigators located a text message dated October 14, 2014 – 10 days prior to APPG's  
16 general appointment - from a case worker's telephone number to Parks's iPhone: "Can you  
17 see Barbara Neely anytime this week? She has questions on the guardianship and how she can  
18 get out of it." A text from Parks's phone replied: "I can and she can't." The reply from the  
19 case worker was: "Ok, I told her the only way would be for a doctor to make that decision. I  
20 didn't want to say too much. She had a lot of questions."

21 On January 30, 2015 Parks filed her first and final accounting in Neely's case. She also  
22 requested the guardianship be terminated because medical experts recently deemed Neely to  
23 be competent. A copy of the evaluation was sent directly to the court and was not filed in the  
24 case. Simmons billed Neely \$25.50 on January 8, 2015 for "Returned call to client RE: End  
25 of Guardianship," according to her accounting. On February 18, 2015 an order was filed  
26 terminating the guardianship that lasted less than four months. Prior to the request for  
27 termination, Parks employed an attorney, Lee Drizin, who also assisted to sell Neely's home.

28 //

1 His fees were \$12,943. On April 15, 2015 Parks filed a receipt with the court, stating she had  
2 received a total of \$5,300.20 that served as her full and final fees in the case.

3 Parks did not bill or write case notes to reference her visit to Neely on October 14, 2014  
4 to discuss Neely's concerns that she did not want to be in guardianship. Case notes reflect in  
5 the subsequent days, Neely requested her computer to be repaired. But once she learned of the  
6 repair costs she said they would cost more than the value of the computer. Neely also requested  
7 help in preparing for a job interview where she needed fingerprints, notarized documents and  
8 new clothes. On November 21, 2014 Parks wrote in her case notes that she arranged for a  
9 mental competency evaluation for Neely to occur on December 31, 2015. Her notes state  
10 "Client seems to be much clearer. Psych appointment has been scheduled to possibly terminate  
11 the guardianship." This was roughly one month after the case worker brought it to Parks's  
12 attention that Neely did not want to be in guardianship.

13 By February 20, 2015 Parks paid herself from Neely's guardianship account a total of  
14 \$6,196.10. However, Parks told the court roughly one month later that she received her full  
15 and final fees of \$5,300.20. Essentially, Parks and Simmons paid themselves an additional  
16 \$895.90 that was omitted in the filing to the court of Parks's receipt of full and final payment  
17 received. Parks at no point informed the court she took the additional funds, which  
18 demonstrates her theft of easily accessible funds by concealing her activities from the court.

19 *Marlene Homer and Marie Long*

20 In several cases, the protected persons requested the guardian's accountings of how  
21 their money was spent and for copies of their bank statements. In turn, some of these protected  
22 persons were billed hundreds of dollars to obtain their own financial guardianship accountings,  
23 which Parks is already required to provide to the court. The protected persons were, of course,  
24 billed for the service. Several protected persons told their case managers that they were  
25 seriously concerned about running out of money, and were fearful their savings would be  
26 drained and would have to move. Some asked to decrease Parks's monthly visit frequencies  
27 and facility outings in an effort to reduce guardianship fees. In some instances, co-guardians  
28

1 suggested to Parks specific cheaper alternatives in order to spare unnecessary guardianship  
2 fees.

3 For example, case notes reflect a visit on December 10, 2014, with Marlene Homer  
4 that Parks made because Homer was concerned she was going to be thrown out of the facility,  
5 where she lived with her elderly mother, Marie Long. Parks explained the women had enough  
6 money to stay at the Lakeview Terrace facility and indicated Homer was overreacting. When  
7 Parks told Homer she would purchase her new clothing and toiletry items, she recalled Homer  
8 saying "No I don't want anything and how can I get anything when I am broke." Parks told  
9 Homer she had the funds to buy the items and stay at the facility with her mother. Parks told  
10 her they would not be thrown out.

11 Sadly, such was not the case. On that same day that Parks discussed Homer's concerns  
12 about money, Homer's guardianship account balance was \$1,102.47. Her income was an  
13 annuity for \$466.15 per month, and Social Security benefits of \$908.40. Her rent at Lakeview  
14 was around \$2,600. On December 14, 2014, Parks gave notice to Lakeview Terrace,  
15 indicating that Homer and Long had a lack of funds to continue living there. The following  
16 day, the Lakeview Terrace administrator, Julie Liebo, filed complaints with Elder Protective  
17 Services on behalf of the women. Parks also on December 14, 2014, gave Liebo notice that  
18 the couple were moving due to a lack of funds. The family could not figure out how quickly  
19 their assets were drained.

20 The budget in the APPG file stated Homer was \$2,631 over-budget each month. While  
21 this budget did not include the \$466.15 annuity, Homer still could not afford to live at  
22 Lakeview Terrace. This evidence clearly demonstrates that Parks was aware that Homer could  
23 not afford to live at Lakeview Terrace when she promised Homer – who was concerned she  
24 could not afford to live there – that she indeed had the funds to afford the facility. Despite  
25 reassuring Homer she had enough money to live there, four days later Parks gave the facility  
26 notice to vacate because the women could not afford it.

27 Even though Homer was concerned about her lack of financial stability, Parks billed  
28 Homer \$113.90 for the visit on December 10, 2014. The following day, Parks's case worker

1 billed Homer \$120 for a "routine" visit. Again, Parks acknowledged that Homer was very  
2 concerned about being "broke" and being evicted from her home because of lack of funds. Yet  
3 Parks billed her for a visit in which she lied to Homer about her finances, and represented she  
4 was not thinking reasonably; Parks then billed her \$120 for an unnecessary visit the very next  
5 day. Homer and Long ultimately were removed from the facility and placed into another home.  
6 Homer later reported to her CareMore nurse practitioner of being sexually abused by a staff  
7 member at the new home, who was later arrested by LVMPD on the allegation. This incident  
8 caused Homer and Long to be moved again, to another facility.

9 *William Flewellen*

10 On June 6, 2012, Parks was appointed as Temporary Guardian of William Flewellen.  
11 At a hearing held in Family Court on June 13, 2012, this temporary guardianship was extended  
12 until July 13, 2012. After this temporary guardianship was extended, no further documents  
13 were filed in this guardianship case by Parks or Simmons. On June 8, 2012, Flewellen died.  
14 His death occurred two days after Parks was appointed as Flewellen's temporary guardian and  
15 five days *before* the hearing at which guardianship was extended for an additional month.  
16 Neither Parks nor Simmons appeared at this hearing, nor did they notify the court that  
17 Flewellen was already dead and hence there was no further need for guardianship.

18 On July 6, 2012, almost one month after the death of Flewellen, Parks and Simmons  
19 removed \$4,807.61 from a bank account belonging to Flewellen and deposited this money to  
20 a guardianship account she opened in her name as guardian of Flewellen. Four days later, on  
21 July 10, 2012, Parks took \$3,800.00 of this money and deposited it to her business account.  
22 The funds in Flewellen's personal account were not in the control of Parks at the time of  
23 Flewellen's death, and as such, Parks had no lawful authority to remove those funds from this  
24 account.

25 According to APPG case notes, by July 10, 2012, when Parks paid herself \$3,800.00,  
26 she had performed only 25 hours 36 minutes of service for Flewellen, billed at \$120.00 per  
27 hour for a total of \$3,082.00. Parks paid herself \$3,800.00 from the funds belonging to the  
28 estate of William Flewellen, which funds she had no legal right to control in the first place.

1 *Jerome and Beverley Flaherty*

2 Parks was also intimately involved in the guardianship and exploitation of Jerome and  
3 Beverley Flaherty. In that case, Parks was approached by James Thomas Melton to obtain  
4 guardianship over the Flaherty's, who had a sizeable estate. Even though Jerome Flaherty had  
5 died and Beverly Flaherty had estate planning documents in place, Parks nevertheless obtained  
6 guardianship over Beverly Flaherty, allowing Melton to use the Flahertys' funds for his own  
7 ends. Guardianship was granted in the Flaherty case based upon a mental health assessment  
8 conducted by Simmons, who failed to advise the court that he worked for APPG. The Flaherty  
9 case forms the basis of charges against Parks, Simmons, Melton, and Simpson in case C-18-  
10 329886-1/2/3/4.

11 *Ruth Braslow*

12 Parks and Simmons utilized various billing scams previously mentioned in order to  
13 exploit Ruth Braslow. A few unique aspects of Braslow's exploitation involved the auction of  
14 the contents of her home, a service which a private company completely handled and Parks  
15 billed for being present (and not needing to be present) or not being there whatsoever.  
16 Additionally, she was excessively billed for home checks, when her house was worth less than  
17 the amount owed – thereby rendering no value to the protected person. This scheme netted the  
18 Defendants \$13,180.67 in illegal proceeds, victimizing Braslow, an elderly person.

19 *Audrey Weber*

20 Another tragic example is the case of Audrey Weber. Weber was being kept alive on  
21 a ventilator and feeding tube. The physician's certificate attached with APPG's guardianship  
22 petition indicated that Weber was "completely supported by machines." She had no known  
23 family or friends, which was known to Simmons, who billed Weber hundreds of dollars to  
24 research that fact. When Parks obtained guardianship in 2012, Weber had around \$7,300 in  
25 her patient trust account at the medical and rehabilitation center, where her life was dependent  
26 on machines. The reason for guardianship was that the hospital was recommending Weber be  
27 removed from life support, which was a decision staff could not make themselves.

28 //

1       Despite Weber being on a ventilator and feeding tube where hospice workers, facility  
2 social workers, and nurses routinely checked on Weber and communicated their observations  
3 to APPG staff, Simmons billed Weber for daily visits. These visits were not necessary and  
4 were done only to benefit APPG through the charging of fees for services. Simmons also  
5 billed for visits that did not occur. The patient trust fund was also not mentioned on an  
6 inventory Parks filed with the court related to Weber's assets.

7       Evidence located in the Weber file revealed that someone had handwritten calculations  
8 on Weber's bank account summary, figuring out how many hours of services needed to be  
9 billed at \$120 to zero out her remaining trust account balance. Subsequent investigation  
10 revealed that Simmons made those handwritten calculations, and created false billings to drain  
11 the remainder of Weber's account. Those falsified billing entries included charging Weber's  
12 estate for a visit on Christmas Day 2012, to visit the mausoleum where Weber's remains were  
13 placed to throw dead flowers away. A similar visit was billed on New Year's Day 2013 in  
14 which Simmons billed for a case worker's traveling to the mausoleum again to clean dirt and  
15 dried flowers. The case worker refused to perform the activities, but Simmons billed Weber's  
16 estate anyway. This investigation concluded that Simmons stole \$3,619.60 from Weber's  
17 estate through fraudulent and false billings after she died following the removal of life support.

18       In total, Parks and Simmons victimized over one-hundred fifty (150) elderly  
19 individuals, only some of whom actually needed guardianship services.

20       Several protected persons under APPG's care were freed from guardianship after they  
21 independently obtained attorneys who filed petitions with the court to have them ultimately  
22 released after providing medical evidence they were mentally competent. For example, the  
23 following are some protected persons as to whom Parks obtained a written medical opinion  
24 that these people had dementia to obtain guardianship; these protected persons were later  
25 removed from guardianship after an new evaluation at their insistence found them to be  
26 competent: Rudy North; Barbara Neely; Georgann Cravedi; Norman Weinstock; Barbara  
27 Lasco; Joseph McCue; Jack King; Milly Kaplove; Herman Mesloh; Shanna Maclin; and  
28 Adolfo Gonzalez.



1 Obviously, the impact of these crimes on the victims is vast. The State submits that the  
2 appropriate sentence for a person who steals \$559,205.32 from elderly victims whom she is  
3 sworn to protect, all the while masquerading as a champion of the elderly, is the maximum  
4 sentence: ninety-six (96) to two-hundred forty (240) months for each count of Exploitation;  
5 forty-eight (48) to one-hundred twenty (120) months for each count of Theft; and nineteen  
6 (19) to forty-eight (48) months for the Perjury count, each to run consecutively to the other.

7 This Defendant was stealing extreme amounts of money without a second thought. If  
8 the penalty assigned to a criminal act is too lenient, it is not really a punishment, but rather  
9 just becomes the cost of doing business. There are plenty of criminals like Defendant, who  
10 believe that if someone can to steal \$559,205.32 and simply receive probation or a short prison  
11 term, that is a deal they are willing to take.

12 That cannot happen in circumstances such as this one. The appropriate penalty for these  
13 crimes, as noted above, is a penalty harsh enough to prohibit people from stealing this vast  
14 amount of money. Then, and only then, can there be deterrence both to the Defendant and to  
15 those who may find themselves similarly situated.

16 **II. THE IMPACT ON SOCIETY ALSO MERITS A SIGNIFICANT**  
17 **AMOUNT OF PUNISHMENT**

18 The actions of Parks and Simmons in this case have caused reverberations far beyond  
19 the impact on the victims. Unlike most criminal cases, this case demonstrates how even those  
20 that are not directly victimized by the Defendants can nevertheless feel the sting of their  
21 criminal behavior.

22 *Impact on the Legal Community*

23 One of the most visible repercussions of Parks and Simmons is the creation of the  
24 Nevada Supreme Court's Guardianship Commission. Although Parks and Simmons were not  
25 the only abusers in the guardianship court, the public outcry from their nefarious deeds was  
26 one factor in the development of the Guardianship Commission. That commission was made

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28 //

1 permanent by order of the Nevada Supreme Court on August 2, 2017.<sup>1</sup> This commission  
2 would not be necessary if Parks, Simmons, and other guardianship abusers would follow the  
3 rules and treat their protected persons like human beings, rather than cash cows.

4 To prevent the types of abuse committed by guardians such as Parks and Simmons, the  
5 Nevada Legislature devoted a large amount of its resources during the 2017 session to the  
6 prevention of elder abuse. The legislature created a Bill of Rights for persons under  
7 guardianship, including the automatic appointment of an attorney to any protected person who  
8 does not already have one. Guardians are no longer permitted to use guardianship assets for  
9 legal fees without the approval of the court, which is reviewing guardianship spending much  
10 more closely.

11 The fixes put in place by the Guardianship Commission, Nevada Legislature, and  
12 family courts in the State of Nevada were an attempt to fix the fleecing that Parks, Simmons,  
13 and their company perpetrated for many years. While it could be argued that some good came  
14 from what Parks did – fixing vulnerabilities in the legal system which enabled Parks to  
15 profiteer off of elderly and vulnerable people, it is misplaced. It would be the same as  
16 commending someone who committed a series of home invasions for showing everyone how  
17 ineffective their door locks were.

#### 18 *Impact on the State of Nevada*

19 It is also important to remember that Nevada is a major tourist and retiree destination.  
20 Much of Nevada's economy is predicated upon the State being a safe and enjoyable place, but  
21 recently-retired individuals will not relocate here if the reputation of the State includes rampant  
22 elder exploitation. There have already been several nationwide stories in the press about this  
23 case. For example, the New Yorker magazine featured a lengthy article about this case, first  
24  
25  
26

27 <sup>1</sup> An overview of the Guardianship Commission, as well as its report to the Supreme Court, is available  
28 at: [https://nvcourts.gov/AOC/Committees\\_and\\_Commissions/Guardianship/Overview/](https://nvcourts.gov/AOC/Committees_and_Commissions/Guardianship/Overview/) (last accessed  
December 24, 2018).

1 published in the October 2017 issue.<sup>2</sup> Similarly, the comedy/news program *Last Week Tonight*  
2 *with John Oliver* featured a main story about guardianship, focusing in particular on this case.<sup>3</sup>  
3 This case has also been reported extensively on major television news outlets such as the  
4 Associated Press, as well as local journalism outlets such the *Las Vegas Review-Journal*, the  
5 senior newspaper *The Vegas Voice*, and the *Las Vegas Sun*. Additionally, the No Equal  
6 Entertainment/INNOV8R production company has recently released a documentary  
7 chronicling the sad journey of Rudy and Rennie North at the hands of Parks and Simmons.

8 The actions of Parks and Simmons in this case have impacted others as well. As noted  
9 above, the Office of the Public Guardian undertook the administration of many of the protected  
10 persons under the care of APPG, when APPG closed its doors. The Public Guardian cannot  
11 absorb such a large influx of cases. These additional cases put significant burdens on that  
12 office, with the inevitable result that the care of all protected persons suffers. The Family  
13 Court has also had its reputation irrevocably damaged by the cavalier actions of Parks and  
14 Simmons.

#### 15 *Impact on Law Enforcement*

16 The impact on law enforcement also cannot be overstated. Since the investigation  
17 began in this case, state and local investigators have dedicated thousands of hours to this case.  
18 These investigators had to review the mountain of paperwork from court filings, internal  
19 reports, financial documents, and countless other data to prepare this case. Again, the  
20 diversion of these law enforcement resources necessarily causes other areas of law  
21 enforcement to suffer. This loss impacts us all.

22 //

23 //

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25 <sup>2</sup> The full article by reporter Rachel Aviv is available at:  
26 <https://www.newyorker.com/magazine/2017/10/09/how-the-elderly-lose-their-rights> (last accessed  
December 24, 2018).

27 <sup>3</sup> The story is available on YouTube at: <https://www.youtube.com/watch?v=nG2pEffLEJo> (last  
28 accessed December 24, 2018). Parks is first specifically mentioned at the 6:26 mark, although several  
of her former protected persons, and the struggles they went through, are mentioned much earlier.

1                   **III.    DEFENDANT’S SUBSEQUENT CONDUCT ALSO DEMONSTRATES**  
2   **THE NEED FOR PUNISHMENT**

3  
4           It would be bad enough if Parks’s conduct were limited to the facts noted above. Sadly,  
5 however, there is more to the story. On May 5, 2016 Parks filed a voluntary Chapter 13  
6 bankruptcy petition in the U.S. Bankruptcy Court Eastern District of Pennsylvania in case  
7 number 16-13247. In that document, Parks affirmed the following statement: “Over the last  
8 180 days before filing this petition, I have lived in this district longer than any other district.”  
9 A follow up to the petition was filed on June 2, 2016 that reiterated her assertion she had been  
10 a Pennsylvania resident longer than she had lived in Nevada the past six months. Parks listed  
11 her prior address of 663 Otono Drive in Boulder City and that she lived there “prior to  
12 12/31/2015.” The petition also included the following information: APPG is closed, with  
13 assets of \$25,000 in receivables, a bank account with a \$200 balance, and miscellaneous office  
14 furniture and equipment. Parks stated the company’s value as \$0, and she was claiming an  
15 exemption of \$12,575.

16           In the bankruptcy petition, Parks also stated that her gross income between January 1,  
17 2015 and December 31, 2015 was \$10,000 related to operating a business. She stated her gross  
18 income between January 1, 2014 and December 31, 2014 was \$40,000 from operating a  
19 business. However, a financial analysis done by Investigator Haynes revealed that Parks’s  
20 income from APPG was \$109,500 in 2014, and \$74,750 in 2015. Payroll records show that  
21 Parks earned \$4,300 in 2016 – which followed the closing of her business on December 31,  
22 2015, and several court orders approving her resignation as guardian.

23           Also in the bankruptcy petition, Parks affirmatively checked the “NO” box on her  
24 application that asked “within one year before you filed for bankruptcy, were you a party in  
25 any lawsuit, court action, or administrative proceeding?” A review of active civil cases in the  
26 Eighth Judicial District Court revealed that statement is false. Beyond the numerous active  
27 ongoing challenges in guardianship court, at the time that Parks filed this document on June  
28 2, 2016, she was facing a negligent death jury trial related to her deceased ward Waveney

1 Nedd. Nedd's son, Carlus Nedd, on November 17, 2014 filed a complaint and demand for  
2 jury trial. Parks also had an active civil lawsuit filed by her former co-guardian, Marilyn  
3 Berquist, alleging that Parks and her attorney unlawfully put a lien on her home, to ensure  
4 payment of fees that had not been court authorized pending Berquist's challenge to APPG's  
5 accounting of how she spent her mother's funds. On June 24, 2016, Parks filed a "Notice of  
6 Bankruptcy Stay" in the Nedd negligent death lawsuit – while omitting it as a lawsuit where  
7 she had been involved as a party during the last year.

8 Included as creditors in the bankruptcy petition was an IRS income tax claim of \$50,000  
9 that accrued between 2010 and present. Several former protected persons are included as  
10 creditors with unsecured claims for "overpayment of guardian fees" to Charles Maddera;  
11 Dorothy Lothman; Estate of Waveny Nedd; James Hagen; Jean Donth; Joseph McCue; Marie  
12 Long; Marlene Homer; Norman Weinstock; Reiko Palmer; Robert Smith; Rosclare Foster;  
13 Rudy and Rennie North; Ruth Braslow; William Brady; and William Vlick.

14 By August 12, 2016 the court dismissed Parks's voluntary bankruptcy petition after she  
15 filed a notice on August 5, 2016 to dismiss it. However, this action followed a creditor's  
16 meeting in which Parks revealed she had only lived in Pennsylvania for just over one month  
17 when she filed her bankruptcy petition, despite her claim in the document she lived there much  
18 longer.

19 As the above makes clear, Parks intentionally filed bankruptcy documents in May and  
20 June 2016 with false information about the salaries she earned from APPG, tenure of her  
21 Pennsylvania residency, and the existence of civil lawsuits filed against her. These actions  
22 demonstrate that Parks engages in an ongoing course and pattern of conduct of lying to the  
23 court through false filings of documents.

24 Parks's abrupt flight from Nevada had further repercussions as well. For example, in  
25 the guardianship case of Juanita Graham, Parks continually failed to appear in court or respond  
26 to calls and emails, ultimately ending in a court finding of contempt. The court based its  
27 contempt order on Parks's failure to file a notice of the death of the protected person, to comply  
28

1 with her fiduciary duties, and to maintain good contact with the court. In addition to fines and  
2 jail time, the court's contempt order also denied her request for guardianship fees.

3 Finally, while not technically a criminal act, Parks's failure to dispose of the cremated  
4 remains of those who had died under her care shows the utter disregard and contempt she holds  
5 for those whom she was sworn to protect. On May 5, 2017, the cremated remains of twenty-  
6 five (25) individuals were located in a storage unit formerly being used by Parks. Most had  
7 been in the unit for several years, and some for over a decade. No known efforts were made  
8 to return the remains to family or other interested parties. Instead, Parks locked them in dark  
9 room, robbing them of their dignity, even in death.

10 **IV. THESE CRIMES AGAINST THE PERSON MANDATE NO MITIGATION**  
11 **FOR THE DEFENDANT**  
12

13 This is a person crime, (NRS Title 200) and it was perpetrated on not only the elderly,  
14 but the most vulnerable of the elderly – people who need others to manage their affairs because  
15 they are no longer capable. The argument that this is a non-violent property crime should not  
16 negate the fact that the Defendant should be sentenced to three-hundred seven (307) to seven-  
17 hundred sixty-eight (768) months in prison. There are many important reasons why  
18 Defendant's criminal acts should not be treated like a trivial matter.

19 As stated in this memorandum, \$559,205.32 is an extremely large sum of money to  
20 steal. When looking at the punishment aspect of for thefts, clearly minimal thefts deserve less  
21 punishment than high-level thefts. The fact that the Felony Theft statute allows for punishment  
22 of up to four (4) to ten (10) years in prison, and that Exploitation allows for punishment of up  
23 to eight (8) to twenty (20) years in prison, per offense, is proof that the legislature intended for  
24 there to be harsher punishment for serious thefts and exploitation. Any counter-argument that  
25 the range was set-up to punish people who were multiple time convicts, is belied by the fact  
26 that we have a habitual criminal statute, NRS 207.010, in which much more harsh penalties  
27 apply for people with such records. If this Defendant does not deserve a harsh penalty under  
28 these statutes, who does?

1        Danger to the community is not limited to “violence,” and exists in financial cases. *See*  
2        *United States v. Burnett*, No. 99-00022-02-CR-W-HFS, 2012 U.S. Dist. LEXIS 74575, at \*3  
3        (W.D. Mo. Apr. 12, 2012), *United States v. Schnetzka*, 629 F. App’x 422, 423 (3d Cir. 2015)  
4        *United States v. Sattler*, No. 3:04-CR-063-L, 2005 U.S. Dist. LEXIS 20901, at \*5 (N.D. Tex.  
5        Sep. 23, 2005). A crime constituting 159-times the threshold category “B” Theft is not your  
6        typical “non-violent property crime” and it should be punished harshly by incarceration for a  
7        lengthy period of time.

8        The large amount of restitution that is required to be repaid should *not* be a factor in  
9        favor of probation. The restitution figure of \$559,205.32 is a large amount. Poorly made  
10       arguments often are presented to the court that we do not have a “debtor’s prison,” and the  
11       related argument of the inability of criminal defendants to repay restitution if stuck in prison.  
12       These arguments fail quickly – because restitution ordered as a result of crime *is not a debt*;  
13       the stealing of money *was not a loan*.

14       The reality of any scenario in which the Defendant is placed on probation and ordered  
15       to pay restitution is that Nevada’s restitution statutes are lacking in enforceability. The  
16       Department of Parole and Probation would have the Defendant fill out a form to determine  
17       how much of his monthly income can be spared for restitution – the numbers can be skewed  
18       to her benefit with minimal accountability. Should the Defendant miss payments, or a  
19       significant amount of restitution is unpaid, there is no relief in the way of a revocation of  
20       probation merely for nonpayment of restitution. Hence, simply ordering the Defendant to  
21       probation does not fulfil the goal of punishment for those who commit the crime, and does not  
22       make the victim whole. Even if the Defendant fully repaid restitution, there is still the fact that  
23       this conduct requires significant punishment regardless of repayment.

24       There is no reason to give this Defendant a punishment of less than the maximum  
25       sentence for her crimes.

26       //

27       //

28       //

1           V.     **THE DEFENDANT DESERVES NO FURTHER LENIENCY THAN THE**  
2                   **REDUCED NUMBER OF CHARGES TO WHICH SHE PLED**

3           The Defendant was facing over 200 felony charges in the original indictment; the plea  
4 she entered was to only six. The reasoning for doing so was that the conduct could be  
5 summarized within the amended charge, and the sentencing range for Exploitation, Theft, and  
6 Perjury allowed for a reasonable amount of prison time, given the scope of what the Defendant  
7 did and the fact she pled and chose not to fight the case. It should be sufficiently clear that all  
8 of the benefits have been bestowed on the Defendant by virtue of allowing her to plead to a  
9 reduced number of felonies, thereby limiting her exposure to a weightier sentence. While this  
10 court has discretion on the ultimate sentence of Defendant, the State contends that a  
11 compelling case has been made that sentencing her to less than the maximum sentence would  
12 be providing the Defendant more leniency than she deserves.

13           Parks and Simmons made a career not only of exploiting the elderly, but the court as  
14 well. They knew that the court was not in a position to scrutinize APPG's accountings,  
15 allowing Parks and Simmons to exploit the elders under their care by exploiting the court  
16 system. The Defendants made a mockery of the court system in order to line their own  
17 pockets.

18           It is also worth noting that Parks still has shown no remorse for any of her actions, and  
19 continues to portray herself as the victim in this case. Even after reviewing the mountain of  
20 evidence as noted above, Defendant's plea was only made pursuant to the *North Carolina v.*  
21 *Alford* 400 U.S. 25 (1970) decision. While Parks has acknowledged that the State could prove  
22 charges against her, she has refused thus far to admit her criminal culpability. Again, the fact  
23 that Parks has shown no remorse for her actions, after ruining the lives of countless victims  
24 and causing immeasurable strife in society, cries out for a severe punishment.

25                                   **CONCLUSION**

26           Defendant is an abuser and a thief.

27           Punishment for a total term of three-hundred seven (307) to seven-hundred sixty-eight  
28 (768) months in prison is a justified and reasonable sentence for an exploiter of the vulnerable




1 like Defendant April Parks. Large scale abuse and theft should not, and will not, be tolerated  
2 in the State of Nevada. Therefore, the State strongly recommends a maximum sentence and  
3 restitution ordered in the amount of \$559,205.32.

4 DATED this 28<sup>th</sup> day of December, 2018.

5 Respectfully submitted,  
6 STEVEN B. WOLFSON  
Clark County District Attorney  
7 Nevada Bar #001565  
ADAM P. LAXALT  
8 Nevada Attorney General  
Nevada Bar #012426

9  
10 BY

  
11 JAY P. RAMAN  
Chief Deputy District Attorney  
12 Nevada Bar #010193

13  
14 BY

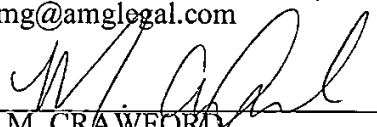
 10193 for  
15 DANIEL E. WESTMEYER  
Senior Deputy Attorney General  
16 Nevada Bar #010273

17  
18 CERTIFICATE OF ELECTRONIC TRANSMISSION

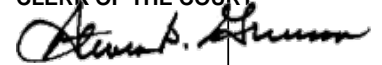
19 I hereby certify that service of the above and foregoing was made this 28<sup>th</sup> day of  
20 December, 2018, by electronic transmission to:

21 ANTHONY GOLDSTEIN, ESQ.  
22 amg@amglegal.com

23 BY

  
24 M. CRAWFORD  
Secretary for the District Attorney's Office  
25  
26  
27

28 16AGJ151/JPR/mc



**MEMO**

Anthony M. Goldstein, Esq. (Nevada Bar #7721)

**LAW OFFICES OF ANTHONY M. GOLDSTEIN**

2421 Tech Center Court

Suite 100

Las Vegas, Nevada 89128

Phone: (702) 796-1114

Fax: (702) 796-1115

**ATTORNEY FOR DEFENDANT**

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
Plaintiff,

vs.

APRIL PARKS,  
Defendant.

)  
) Case #: C-17-321808-1  
)  
) Dept. : X  
)  
)  
)  
)  
)  
)  
) Date of Hearing: 1/4/19  
)  
) Time of Hearing: 9:00am  
)

DEFENDANT APRIL PARKS'S SENTENCING MEMORANDUM

///

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///

1 Anthony M. Goldstein, Esq., court-appointed counsel for  
2 indigent Defendant APRIL PARKS, respectfully submits this  
3 Sentencing Memorandum in and for the sentencing hearing that is  
4 currently scheduled for January 4<sup>th</sup>, 2019.  
5  
6  
7

8 **LAW OFFICES OF ANTHONY M. GOLDSTEIN**

9  
10 Dated: January 2, 2019

By: /s/ Anthony M. Goldstein  
Anthony M. Goldstein, Esq.  
Nevada Bar #7721  
2421 Tech Center Court  
Suite 100  
Las Vegas, Nevada 89128  
Phone: (702) 796-1114  
Fax: (702) 796-1115  
**ATTORNEY FOR DEFENDANT**

1 **I. Introduction**

2  
3 Upon a cursory review of the Indictment and of the  
4 Declaration of Arrest/Warrant, immediate condemnation of April  
5 Parks seems both appropriate and easy. However, once one  
6 actually delves into the totality of the circumstances and  
7 investigate the allegations beyond a media-friendly superficial  
8 level, we arrive at an entirely different conclusion as to her  
9 true role in the malfeasance.

10 The State charged this case on the premise that April was a  
11 criminal mastermind who orchestrated an elaborate racket to  
12 *financially* exploit vulnerable members of the community. From  
13 the outset, please allow clarification of one matter: not one of  
14 the almost 300 charges that the State levied against April  
15 involves any sort of physical abuse - or even negligent  
16 treatment - towards any of the named victims. At no point did  
17 the State even accuse April, either personally or via her  
18 alleged criminal racket, of committing even one instance of  
19 physical abuse against any of the wards. Nor does the State  
20 allege that April deprived any ward of any service or medical  
21 treatment whatsoever.

23 The vast plurality of charges against April involve the  
24 allegation of exploitation. The Nevada Supreme Court defines  
25 "exploitation" as,

1 [A]ny act taken by a person who has the trust and  
2 confidence of an older person or any use of the power of  
3 attorney or guardianship of an older person to obtain  
4 control, through deception, intimidation or undue  
5 influence, over the older person's money, assets or  
6 property with the intention of permanently depriving the  
7 older person of the ownership, use, benefit or  
8 possession of his **money, assets or property**. As used in  
9 this subsection, "undue influence" does not include the  
10 normal influence that one member of a family has over  
11 another."

12 -Vallery v. State, 118 Nev. 357, 46 P.3d 66 (Nev., 2002),  
13 citing NRS 200.5092(2). *Emphasis Added.*

14 Accordingly, the "exploitation" referenced throughout this  
15 case is exclusively of the financial variety and the State must  
16 agree that none of the wards was physically abused - whether  
17 directly or negligently - at any point.

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A. The Premise of the State's Case

The State synopsized the nature of April's alleged misconduct in its, "Ex Parte Motion on Bail":

The evidence adduced at the grand jury showed that A Private Professional Guardian, LLC was ran as a criminal enterprise, with the goal of maximizing their profits at the expense of the people they were charged with caring for, intentionally disregarding the duty to the wards as a guardian, fiduciary, and duty of honesty to the Court.

*-State's "Ex Parte Motion on Bail", filed on March 8<sup>th</sup>, 2017, Page 2. Emphasis Added.*

The State's proactive bail motion - filed on the same date as the Indictment and prior to the Court's appointing counsel for April - claims that April's company had the goal of, "maximizing their [sic] profits". In a situation where the primary goal is to maximize profits, the first order of forensic accounting is to follow the money.

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## 1. State of Nevada's Investigation Into April's Finances

Investigator Jaclyn O'Malley of the Nevada Attorney General's Office served as the State's primary investigator in this case. She personally spent approximately eighteen months working the case prior to the Grand Jury proceedings. *State's Return to Writ in companion case C-18-329886-2, Page 3, Lines 10-11).*

In the, "Declaration of Arrest/Warrant" that Investigator O'Malley prepared for the present case, she stated as follows:

PARKS gave consent to the search of storage facilities she rented located at 3290 E. Oleta Ave, Henderson, NV 89074 (units B017, B037, B070, B076, B077, B084, B085, C030, D055, D088 & D089). Numerous boxes of hard copy business and ward files were recovered and a forensic computer analysis was ultimately performed on seized computers, iPads and smart phones. All of this evidence – that included tens of thousands of documents in addition to thousands of computer files was thoroughly examined and reviewed for its relevancy to the investigation.

-Declaration of Arrest/Warrant, Officer Jaclyn O'Malley,  
Page 10.

So Investigator O'Malley and her team conducted a massive and thorough forensic investigation of tens of thousands of hard documents, thousands of digital files and analyzed all of April's personal and work computers, tablets and phones. The crew found no Ferraris, no mansions, no records of gambling, no evidence of substance abuse issues and no secret off-shore banks accounts.

1 In fact, at the time the State portrays April as a greedy,  
2 profiteering crime boss, April drove a 2009 Pontiac (*Declaration*  
3 *of Arrest/Warrant, Officer Jaclyn O'Malley, Page 2, Paragraph 5*)  
4 and rented a modest 1,374 square foot house in Boulder City for  
5 herself and her family.<sup>1</sup>

6 Unable to locate the proceeds of this alleged criminal  
7 racket, Investigator O'Malley offered the following solution to  
8 where the alleged riches went:  
9

10  
11 I learned through this investigation that not all of PARKS' wards had available income at any given  
12 time. This meant that while APPG staff may have documented a certain amount of fees in a month;  
13 they often did not collect the entire amount. This fact tends to support the motivation behind  
14 fraudulently billing wards as a matter of general policy in order to collect as much fees as possible.

15  
16 ***-Declaration of Arrest/Warrant, Officer Jaclyn O'Malley,***  
17 ***Page 12.***

18 So Investigator O'Malley apparently concluded that April  
19 was, "fraudulently billing" certain wards in order to make up  
20 for payments that she was not able to collect from other,  
21 indigent wards. Please note that even if Investigator O'Malley  
22 were correct, the defense is not claiming that April was some  
23 sort of Robin Hood. However, at worst, her motivation, as  
24 Officer O'Malley seemingly concluded, was merely to sustain her  
25 business and not to personally enrich herself.

///  
26

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<sup>1</sup> According to a leading real property valuation and sales website  
www.zillow.com, this current market value of this house is \$303,000.00.



1  
2 **2. April's Bankruptcy in Pennsylvania**

3  
4 After media coverage of her situation took its toll on  
5 April and her young children, she and her husband (co-defendant  
6 Gary Taylor) moved from Boulder City to her husband's native  
7 Pennsylvania. Shortly thereafter, they jointly filed for  
8 bankruptcy in the Eastern District of Pennsylvania. Regarding  
9 April and Gary's bankruptcy petition, the State argued to this  
10 Court as follows:

11  
12  
13 19 In May of 2016 Defendant Parks  
14 20 filed a Bankruptcy Petition in the Eastern District of Pennsylvania. The petition, which has  
15 21 since been voluntarily dismissed contained lies and misrepresentations about residency, income,  
16 22 and other important factors.

17  
18 *-State's "Ex Parte Motion on Bail", filed on March 8<sup>th</sup>,  
19 2017, Page 7. Emphasis Added.*

20  
21 11 U.S. Code § 704 sets forth the duties of the Trustee in  
22 a bankruptcy action. This statute mandates that,

23 (a) The trustee shall -

24 (4) investigate the financial affairs of the debtor

25 ///

///

///

1       So despite the State's brazen claims that April's petition  
2 included, "lies and misrepresentations about residency, income  
3 and other important factors", please note that neither the  
4 Federal Bankruptcy Court Trustee, the United States Attorney,  
5 nor the State of Pennsylvania ever sought court sanctions - let  
6 alone brought criminal charges - against April for perjury or  
7 perpetrating any type of fraud in her Petition.  
8

9  
10       Accordingly, assuming Officer O'Malley and the Federal  
11 Bankruptcy Trustee for the Eastern District of Pennsylvania did  
12 their jobs, there is simply no evidence that April profiteered  
13 from any of her allegedly illicit business practices. This  
14 contradicts the State's aforementioned audacious claims.

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1 **II. Background of April Parks and A Private Professional**  
2 **Guardianship, LLC**

3  
4 After working for several years under prominent  
5 guardianship attorneys in Clark County, April established, "A  
6 Private Professional Guardian, LLC" ("APPG") on May 23<sup>rd</sup>, 2011.  
7 As stated previously herein, Investigator O'Malley spent  
8 approximately eighteen months preparing the case against April  
9 and the co-defendants for the Grand Jury's consideration. Ms.  
10 O'Malley testified under oath as follows regarding the  
11 qualifications and professional reputation of PARKS:  
12  
13

14 21 A. Sure. Throughout my investigation which  
15 22 consisted of reviewing evidence that we found at her  
16 23 business and historical records that I found, we learned  
17 24 that April Parks is a highly experienced, highly trained  
18 25 professional guardian who markets herself as such.  
19  
20

21 ***-Reporter's Transcript of Proceedings, Testimony of Jaclyn***  
22 ***O'Malley, Volume 1, Page 84.***

23 ///

24 ///

25 ///

1       Aside from April, the only other licensed guardian at APPG  
2 was co-defendant Mark Simmons. According to Investigator  
3 O'Malley,

5 12       Defendant Simmons was a certified guardian, and in control of much of the operations  
6 13       of A Private Professional Guardian, LLC.

7       ***-State's, "Ex Parte Motion on Bail", filed on March 7<sup>th</sup>,  
8 2017, Page 9.***

9       During the Grand Jury proceedings, the State asked former  
10 APPG employees Heidi Kramer and Anjelica Sanchez about April and  
11 Mark's respective roles within APPG:

13  
14 24       Q.   So who was in charge of billing within the  
15 25       office?

16  
17 1       A.   From to the best of my knowledge it would  
18 2       be Mark.

19       ***-Testimony of Heidi Kramer, Reporter's Transcript of  
20 Proceedings, Volume 7-B, Pages 31-32.***

21       ///

22       ///

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13 Q. Tell us more about what April's role was.  
14 A. April would, when I initially started with  
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  
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  
25 the phone calls coming through. He would help maintain

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  
5 well, and then he would also do ward visits in addition  
6 to myself and April.

***-Testimony of Anjelica Sanchez, Reporter's Transcript of  
Proceedings, Volume 7-A, Pages 9-10.***

22 ///

23 ///

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1           Based on the combined testimony of Ms. Sanchez and Ms.  
2 Kramer, it appears that Mark Simmons primarily handled in-office  
3 matters such as billing at APPG (hence Ms. Sanchez labeled him,  
4 "Air Traffic Controller") and April was out in the field.

5           With all due respect to Investigator O'Malley, she  
6 misinterpreted significant portions of the evidence she  
7 collected and improperly repurposed it to cast April in an  
8 inaccurate and negative manner. A clear example is Investigator  
9 O'Malley's rendition of an event whereby April threatened to  
10 refer a care facility's staff member for prosecution:  
11

12  
13           Kahn recalled PARKS arriving to the facility on a Saturday where she stayed for four hours  
14 "*ordering staff around and threatening with intimidation.*" She said PARKS – in her presence – called  
15 the recently terminated employee who exploited McCann. Kahn said PARKS left the former employee  
16 a threatening voice mail indicating she had 20 minutes to call back to avoid prosecution. However,  
Kahn said PARKS lied about the time of the call so it would appear the employee did not call back in  
time.

17           ***-Declaration of Arrest/Warrant, Investigator Jaclyn***  
18           ***O'Malley, Page 34.***

19           The facts of this situation are not in dispute - this comes  
20 down to a simple matter of interpretation of those facts. April  
21 learned that a staff member of a facility which housed one of  
22 her wards was wrongfully exploiting said ward. Upon learning of  
23 the mistreatment, April stormed into the facility - on a  
24 Saturday - and telephonically reprimanded the staff member for  
25 the egregious conduct against her ward.

1 April also unequivocally threatened to notify prosecutors  
2 if the offending staff member or treatment facility executive  
3 failed to provide her with an adequate explanation of the  
4 situation. Despite Investigator O'Malley's apparently utilizing  
5 this event to portray April as a violent, aggressive person, it  
6 actually shows how passionate April was about protecting her  
7 wards. That was not April's being a mean-spirited bully as  
8 Investigator O'Malley conveyed - that was April's doing her job.  
9

10  
11 April was certainly the face of APPG and unfortunately,  
12 both the State and the media have vilified her accordingly.  
13 However, the above analysis of the corporate structure of APPG  
14 and the respective roles of the primary parties reveals that  
15 April was not even in charge of APPG's billing. Clearly, as  
16 Managing Member of the LLC, she failed in her duties to duly  
17 supervise the day-to-day billing practices of her many employees  
18 and especially APPG's billing guru: Mark Simmons.

19 ///

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1 A. The Search Warrant on APPG at April's Home

2  
3 On September 21<sup>st</sup>, 2015, LVMPD officers executed a search  
4 warrant at the residence of April Parks at 663 Otono Drive in  
5 Boulder City.<sup>2</sup> April immediately and fully cooperated with the  
6 executing officers:

7  
8 TH: Yeah in a second. We have a search warrant for your house.

9  
10 AP: Come on in.

11 ***-Transcript of Interview with Det. Todd Hendrix, Search  
Warrant, Page 1, Event #20150818-2043.a***

12  
13 After welcoming officers into her home, she then chose to  
14 participate in a lengthy interview with multiple LVMPD officers  
15 without her attorney, Keith Brower, Esq.'s, involvement:

16  
17 it. I run an honest business. And I probably should not even be talking to you because Keith's  
18 gonna lose his mind that I am.

19  
20 ***-Transcript of Interview with Det. Todd Hendrix, Search  
Warrant, Page 17, Event #20150818-2043.***

21 ///

22 ///

23  
24 <sup>2</sup> In addition, please note that approximately 30 minutes after LVMPD Officers  
arrived at April's residence, members of the local media arrived at the  
scene. Since obviously April was unaware of the imminent search, she could  
25 not have notified the media. This trend of someone other than April's  
inviting media to participate in the case has continued for years, including  
as recently as the hearing on November 5<sup>th</sup>, 2018, when the co-defendants  
entered their pleas herein.



1           So unlike the aforementioned Ms. Sanchez and Ms. Kramer,  
2 who each retained separate private attorneys to advise them  
3 prior to testifying at the Grand Jury, April chose to speak  
4 freely with officers on her own and at great length.

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1 **III. Letters of Support**

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Attached as Exhibit 1, please find letters of support  
from:

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1. Carly Parks (April's Daughter)

2. Cody Parks (April's Son)

3. Tommy Parks (April's Son)

4. Ilene Gordon (April's Mother)

5. Deborah Fenimore-Herdman (April's Friend)

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1 **CONCLUSION**

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3  
4 Upon researching and ultimately understanding the inner-  
5 workings of, "A Private Professional Guardian, LLC", one could  
6 arrive at many conclusions regarding April Parks and her role in  
7 the egregious misconduct alleged. Initially, she was the only  
8 licensed Guardian at APPG and therefore personally answerable -  
9 even liable - for the approximately 100 wards that were on  
10 APPG's roster at any given time.

11 In addition to her duties as a Guardian, she shouldered the  
12 burden of single-handedly running a complex, ever-expanding  
13 business and supervising staff members who traveled all over  
14 Clark County to serve APPG's wards. As the number of wards  
15 increased, so did APPG's staff and of course, April's resultant  
16 administrative responsibilities at APPG skyrocketed as well.  
17

18 Once Mark Simmons became a licensed Guardian, April  
19 delegated significant responsibilities to him. The most  
20 significant of these responsibilities - and that which the  
21 Indictment primarily charges the defendants - involves billing.  
22 According to former employees Anjelica Sanchez and Heidi Kramer,  
23 Simmons was in charge of supervising the billing process at  
24 APPG.

25 ///

1       Of course, as the founder, owner and Managing Member of  
2 APPG, April was certainly, "at the wheel" when the billing  
3 issues took place. They happened while she was in charge.  
4 However, to send her to prison for a minimum of 64 months that  
5 P&P recommends - let alone the higher bottom number that the  
6 State is certain to ask for at sentencing - wrongfully punishes  
7 April for the actions of others.

8  
9       April failed to duly supervise her underlings. April  
10 delegated critical responsibilities at APPG to certain people  
11 who took advantage of said failure to supervise. Even  
12 understanding that April entered her pleas herein pursuant to  
13 *Alford*, April perhaps either turned a blind eye to the  
14 malfeasance at APPG or possibly occasionally succumbed to the  
15 ease of defrauding the guardianship system. In doing so, April  
16 utterly failed her wards.

17       However, April did not, as the State alleges, operate a  
18 criminal enterprise with the intention of profiteering off the  
19 vulnerable members of our community. Financial issues aside, it  
20 is indisputable that April always ensured that the health,  
21 safety and welfare of her wards would never be in jeopardy under  
22 her watch.

23       ///

24       ///

1 April still vigorously disputes that she perpetrated all of  
2 the approximately 300 crimes with which the State charged her in  
3 both of her pending cases. Further, as the State will certainly  
4 point out at sentencing, technically she never even admitted  
5 that she committed the specific crimes for which the Court will  
6 sentence her on January 4<sup>th</sup>, 2019.

7  
8 However, prior to her incarceration in the present matter  
9 on April 4<sup>th</sup>, 2017, April had never spent one day in custody in  
10 her entire life. Now, after spending approximately 21 months in  
11 the Clark County Detention Center, she knows that she did wrong.  
12 She knows that she failed those whom she swore to protect.  
13 However, she also knows that when she was doing right, she truly  
14 helped countless destitute wards endure their struggle and/or  
15 end their lives with dignity and comfort.

16  
17 April will reserve a specific sentencing recommendation for  
18 the time of sentencing.

19 **LAW OFFICES OF ANTHONY M. GOLDSTEIN**

20  
21 Dated: January 2, 2019

By: /s/ Anthony M. Goldstein  
Anthony M. Goldstein, Esq.  
Nevada Bar #7721  
2421 Tech Center Court  
Suite 100  
Las Vegas, Nevada 89128  
Phone: (702) 796-1114  
Fax: (702) 796-1115  
**ATTORNEY FOR DEFENDANT**

## Exhibit 1

## ~The Strongest Woman I Know~

Hello, I'm Carly Parks, April Parks's daughter. I'm probably the second best person that knows her well. With the first being her parents of course. Anyway, my mother and I are basically best friends. I tell her everything which is nice because then there are no secrets between us. I've always been super close to my mom, and I think it's pretty safe to say that she's the best mom ever. My mom and I have been through a lot these past few years but our bond is still strong. My mother is no doubt my number one role model, she's strong, determined, brave, kind, caring and compassionate, I mean seriously that woman cries at everything! My whole life growing up with her she always taught me new things whether it was life lessons or how to keep a house clean and in order. I know my mom has always tried to be the best she could for us kids. She was definitely a fun mom but when we did something wrong she, of course, would discipline us by grounding us or taking our phones away. I truly believe my mother is 100% the best person ever. I remember when I was sick one time and throwing up, so she put me in the bathtub and gave me a bath, then once I got out she coozied me up on my bed and sang the song "I am a child of God" until I fell asleep. I also remember always watching QVC with her and we would sometimes call the number just to hear our voices on the air. My mom is definitely the light in my world, she's so funny and her smile or laugh could make anyone's day. My mother has raised three smart, kind, caring children and the thanks are all to her. I honestly don't know where I would be currently if that woman wasn't in my life. Most mothers and daughters aren't super close but my mom and I we defeat that stereotype we're closer than two peas in a pod. These past two years with my mom being in a detention center have been extremely difficult, with me just starting high school this year I have needed my mom more than anything or anyone. I also think that these are very important times for my mother to witness, A couple months ago I had my first high school dance and she wasn't there to see or help me get ready. I miss my mom more than anything and I love her so much, I just can't wait until I see her again.

Sincerely, Carly Parks

To whom this may concern,

April Parks is a great mother and person. She makes sure that everyone is taken care of before herself. She had run a successful business while balancing home life with her family. She is all about family and is considerate of those around her. Even in the circumstances she is in, she is not the person who the outside world had made her out to be. The youngest of the family needs her more in her life than anyone else as she grows up. This concludes that we miss her dearly, we want her back in our lives and our family so we can all move forward together.

If for any reason, please contact me at 702-538-2044.

Sincerely,  
Cody Parks



As April Parks oldest son I can say with confidence that she deserves parole/probation. She was always a good mother to her 3 children and raised us up to always do the right thing and make good choices. She was always there for her kids anytime we needed her she on numerous occasions has helped me out if bad situations including a very harmful relationship giving me a place to stay in her home well after being out of her house for years. She has helped me financially when I fell on hard times and couldn't pay a bill or my rent. She is also always given me advice or helped me talk out a problem I was having. My mother has never used any illicit substance and never had an alcohol problem. She has never been in trouble with the law. She is a kind caring and loving person and did not deserve any of what is happening. Her family and children miss her very much and just want her home. I love my mother very much and miss her. She has missed so many things while dealing with this including the marriage to my wife and I don't want her miss anymore. She is a great mom and is loved very much she did amazing with her children and I learned how to be an adult from her. Please allow her to be paroled/probation and come home to her family.

>

> Tommy J Parks

> Cell: (702) 578 0448

> Soar Transportation Group

> Professional Driver

Your Honor

My name is Ilene Gordon and I am writing to you about my daughter April Lynn Parks who is to be sentenced on January 4, 2019.

I am 83 years old and my husband is 79. We are the guardians of April's daughter 15 year old daughter Carly Parks. My husband suffered a stroke in October of this year and we would appreciate your consideration.

Her daughter truly needs her mother at this stage in her life. She truly pines for her.

Carly is a beautiful young lady and we have no problems with her. April has been a single mother in the past.

We feel that she would rehabilitate at a faster pace in our home in Saint George, Utah, probation or parole permitting. We are financially able to look after them until they strike out on their own.

April has had some medical problems since she has been incarcerated and we hope that we might be able to resolve these as well.

We will keep you in our prayers as we do our daughter. It is a difficult decision we know. We are not without feelings for the many who may have suffered.

Sincerely,

Ilene Gordon