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DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

APRIL PARKS #1571645
MARK SIMMONS
GARY NEAL TAYLOR
NOEL PALMER SIMPSON

Defendant(s).

CASE NO: C-17-321808-1

DEPT NO: X

INDICTMENT

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

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

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

COUNT 1 - RACKETEERING

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

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

COUNT 2 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between May 3, 2012 and July 11, 2012 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to AUDREY WEBER and/or the ESTATE OF AUDREY WEBER, in the following manner, to wit: through the use of a false billing scheme, thereby unlawfully converting money belonging to AUDREY WEBER and/or the ESTATE OF AUDREY WEBER in the amount of approximately \$3,819.60. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for AUDREY WEBER 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 AUDREY WEBER or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private

Professional Guardian, LLC that either did not benefit AUDREY WEBER or did not occur, and/or directed Angelica Sanchez and/or ///

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

COUNT 3 - THEFT

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

COUNT 4 - THEFT

Defendants APRIL PARKS and NOEL PALMER SIMPSON did on between August 22, 2011 and May 15, 2012 willfully, knowingly, feloniously, and without lawful authority, obtain lawful money of the United States in the amount of \$3,500.00 or more, belonging to JOHN DENTON and/or SALLY DENTON, by a material misrepresentation with intent to deprive those persons of the property, in the following manner, to wit: by APRIL PARKS exceeding her authority as guardian of MARY WOODS changing MARY WOODS' life insurance beneficiary from JOHN DENTON and/or SALLY DENTON to herself, without court permission; and by NOEL PALMER SIMPSON filing a Petition to Set Aside Estate Without Administration in the Clark County District Court, containing false statements in the probate case of MARY WOODS, and unlawfully changing MARY WOODS' life insurance beneficiary from JOHN DENTON and/or SALLY DENTON to the ESTATE OF MARY WOODS, thereby depriving JOHN DENTON and/or SALLY DENTON of \$25,278.57, from

which NOEL PALMER SIMPSON was paid \$9,196.70. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby by APRIL PARKS exceeded her authority as guardian of MARY WOODS and changed MARY WOODS' life insurance beneficiary from JOHN DENTON and/or SALLY DENTON to herself, without court permission; and whereby NOEL PALMER SIMPSON filed a Petition to Set Aside Estate Without Administration in the Clark County District Court, containing false statements in the probate case of MARY WOODS P-12-074144-E, and unlawfully changing MARY WOODS' life insurance beneficiary from JOHN DENTON and/or SALLY DENTON to the ESTATE OF MARY WOODS; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 5 - THEFT

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

COUNT 6 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between December 3, 2012 and November 4, 2013 willfully, unlawfully and feloniously exploit an older person having been born in 1922, to wit: DOROTHY TRUMBICH and/or THE DOROTHY A.

TRUMBICH REVOKABLE TRUST, by use of a guardianship converting DOROTHY TRUMBICH's money, assets or property, Defendants intending to permanently deprive DOROTHY TRUMBICH of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, banking visits, and/or by unlawfully controlling trust assets, thereby exploiting DOROTHY TRUMBICH in the amount of approximately \$167,204.49. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for DOROTHY TRUMBICH 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 DOROTHY TRUMBICH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or by unlawfully controlling assets from THE DOROTHY A. TRUMBICH REVOKABLE TRUST and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit DOROTHY TRUMBICH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 7 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between January 4, 2013 and November 4, 2013 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to DOROTHY TRUMBICH and/or the ESTATE OF DOROTHY TRUMBICH and/or THE DOROTHY A. TRUMBICH

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

COUNT 8 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between April 16, 2013 and November 3, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1925, to wit: RUTH BRASLOW, by Defendants, having the trust or confidence of RUTH BRASLOW or by use of a power of attorney or guardianship, obtain control, through deception, intimidation or undue influence, over RUTH BRASLOW's money, assets or property and/or by converting RUTH BRASLOW's money, assets or property, Defendants intending to permanently deprive RUTH BRASLOW of the ownership, use, benefit or possession of her money, assets or property having an value of more than

\$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, banking visits, and fraudulent fees thereby exploiting RUTH BRASLOW in the amount of approximately \$13,180.67. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for RUTH BRASLOW 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 RUTH BRASLOW or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit RUTH BRASLOW or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 9 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between April 16, 2013 and November 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to RUTH BRASLOW and/or the ESTATE OF RUTH BRASLOW, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, banking visits, and fraudulent fees thereby unlawfully converting money belonging to RUTH BRASLOW in the amount of approximately \$13,180.67. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of

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

COUNT 10 - EXPLOITATION OF AN OLDER PERSON

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

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

COUNT 11 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between October 4, 2013 and November 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to JAMES POYA and/or the ESTATE OF JAMES POYA, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to JAMES POYA in the amount of approximately \$6,032.50. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for JAMES POYA 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 JAMES POYA or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit JAMES POYA or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 12 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between November 3, 2014 and November 3, 2015 willfully, unlawfully and feloniously exploit an older person

having been born in 1942, to wit: CAROLYN RICKENBAUGH, by use of a guardianship converting CAROLYN RICKENBAUGH's money, assets or property, Defendants intending to permanently deprive CAROLYN RICKENBAUGH of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting CAROLYN RICKENBAUGH in the amount of approximately \$3,804.39. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for CAROLYN RICKENBAUGH 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 CAROLYN RICKENBAUGH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit CAROLYN RICKENBAUGH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 13 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between November 3, 2014 and November 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to CAROLYN RICKENBAUGH and/or the ESTATE OF CAROLYN RICKENBAUGH, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to CAROLYN

RICKENBAUGH in the amount of approximately \$3,804.39. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for CAROLYN RICKENBAUGH 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 CAROLYN RICKENBAUGH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit CAROLYN RICKENBAUGH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 14 - EXPLOITATION OF AN OLDER PERSON

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

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COUNT 15 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013 and November 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to DELMOND FOSTER and/or the ESTATE OF DELMOND FOSTER, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to DELMOND FOSTER in the amount of approximately \$5,134.40. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for DELMOND FOSTER 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 DELMOND FOSTER or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did

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

COUNT 16 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between April 2, 2013 and November 4, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1928, to wit: WILLIAM BRADY, by use of a guardianship converting WILLIAM BRADY's money, assets or property, Defendants intending to permanently deprive WILLIAM BRADY of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting WILLIAM BRADY in the amount of approximately \$9,470.80. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for WILLIAM BRADY 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 WILLIAM BRADY or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit WILLIAM BRADY or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 17 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between April 2, 2013 and November 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use

the services or property of another person entrusted to them, or placed in their 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, belonging to WILLIAM BRADY and/or the ESTATE OF WILLIAM BRADY, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to WILLIAM BRADY in the amount of approximately \$9,470.80. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for WILLIAM BRADY 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 WILLIAM BRADY or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit WILLIAM BRADY or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 18 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013 and September 3, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1931, to wit: PATRICIA SMOAK, by use of a guardianship converting PATRICIA SMOAK's money, assets or property, Defendants intending to permanently deprive PATRICIA SMOAK of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting PATRICIA SMOAK in the amount of approximately \$5,563.60.

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

COUNT 19 - THEFT

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

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COUNT 20 - EXPLOITATION OF AN OLDER PERSON

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

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

COUNT 21 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between October 24, 2013 and September 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to MARILYN SCHOLL and/or the ESTATE OF MARILYN SCHOLL, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to MARILYN SCHOLL in the amount of approximately \$6,262.48. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for MARILYN SCHOLL and overcharged for ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit MARILYN SCHOLL or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit MARILYN SCHOLL or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 22 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between January 5, 2015 and September 3, 2015 willfully, unlawfully and feloniously exploit an older person

having been born in 1944, to wit: KENNETH EDWARDS, by use of a guardianship converting KENNETH EDWARDS' money, assets or property, Defendants intending to permanently deprive KENNETH EDWARDS of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting KENNETH EDWARDS in the amount of approximately \$2,622.62. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for KENNETH EDWARDS 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 KENNETH EDWARDS or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit KENNETH EDWARDS or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 23 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between January 5, 2015 and September 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their possession for a limited, authorized period of determined or prescribed duration or for a limited use, having a value of \$650.00 or more, belonging to KENNETH EDWARDS and/or the ESTATE OF KENNETH EDWARDS, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to KENNETH EDWARDS in

the amount of approximately \$2,622.62. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for KENNETH EDWARDS 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 KENNETH EDWARDS or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit KENNETH EDWARDS or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 24 - EXPLOITATION OF AN OLDER PERSON

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

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COUNT 25 - THEFT

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

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

COUNT 26 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013 and September 3, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1937, to wit: JANICE MITCHELL, by use of a guardianship converting JANICE MITCHELL's money, assets or property, Defendants intending to permanently deprive JANICE MITCHELL of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting JANICE MITCHELL in the amount of approximately \$4,766.37. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for JANICE MITCHELL 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 JANICE MITCHELL or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit JANICE MITCHELL or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 27 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between April 4, 2013 and September 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to JANICE MITCHELL and/or the ESTATE OF JANICE MITCHELL, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to JANICE MITCHELL in the amount of approximately \$4,766.37. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for JANICE MITCHELL 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 JANICE MITCHELL or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit JANICE MITCHELL or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 28 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between December 3, 2013 and December 8, 2014 willfully, unlawfully and feloniously exploit an older person having been born in 1932, to wit: MARY VITEK, by use of a guardianship converting MARY VITEK's money, assets or property, Defendants intending to permanently deprive MARY VITEK of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary,

overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting MARY VITEK in the amount of approximately \$2,705.39. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for MARY VITEK 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 MARY VITEK or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit MARY VITEK or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 29 - THEFT

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

COUNT 30 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between July 5, 2013 and February 3, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1921, to wit: CLYDE BOWMAN, by use of a guardianship converting CLYDE BOWMAN's money, assets or property, Defendants intending to permanently deprive CLYDE BOWMAN of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting CLYDE BOWMAN in the amount of approximately \$3,820.14. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for CLYDE BOWMAN 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 CLYDE BOWMAN or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit CLYDE BOWMAN or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;

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

COUNT 31 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between July 5, 2013 and February 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to CLYDE BOWMAN and/or the ESTATE OF CLYDE BOWMAN, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to CLYDE BOWMAN in the amount of approximately \$3,820.14. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for CLYDE BOWMAN 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 CLYDE BOWMAN or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit CLYDE BOWMAN or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 32 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between July 5, 2013 and July 3, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1925, to wit: ROY FRANKLIN, by use of a guardianship converting ROY

FRANKLIN's money, assets or property, Defendants intending to permanently deprive ROY FRANKLIN of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting ROY FRANKLIN in the amount of approximately \$5,806.97. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for ROY FRANKLIN 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 ROY FRANKLIN or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit ROY FRANKLIN or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 33 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between July 5, 2013 and July 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to ROY FRANKLIN and/or the ESTATE OF ROY FRANKLIN, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to ROY FRANKLIN in the amount of approximately \$5,806.97. Defendants are criminally liable under one or more of the

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

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COUNT 34 - EXPLOITATION OF AN OLDER PERSON

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

COUNT 35 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between December 3, 2013 and November 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to JUANITA GRAHAM and/or the ESTATE OF JUANITA GRAHAM, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to JUANITA GRAHAM in the amount of approximately \$5,766.75. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for JUANITA GRAHAM 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 JUANITA GRAHAM or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit JUANITA GRAHAM or did not occur, and/or directed Angelica Sanchez and/or

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

COUNT 36 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between July 3, 2014 and May 4, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1935, to wit: YOSHIKO KINDAICHI, by use of a guardianship converting YOSHIKO KINDAICHI's money, assets or property, Defendants intending to permanently deprive YOSHIKO KINDAICHI of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting YOSHIKO KINDAICHI in the amount of approximately \$3,699.28. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for YOSHIKO KINDAICHI 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 YOSHIKO KINDAICHI or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit YOSHIKO KINDAICHI or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 37 - THEFT

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

COUNT 38 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between July 4, 2013 and June 5, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1934, to wit: WALTER WRIGHT, by use of a guardianship converting WALTER WRIGHT's money, assets or property, Defendants intending to permanently deprive WALTER WRIGHT of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting WALTER WRIGHT in the amount of approximately \$4,183.08. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit:

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

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COUNT 39 - THEFT

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

COUNT 40 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between March 5, 2014 and June 4, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1932, to wit: DELORES SMITH, by use of a guardianship converting DELORES SMITH's money, assets or property, Defendants intending to permanently deprive DELORES SMITH of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting DELORES SMITH in the amount of approximately \$6,166.30. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for DELORES SMITH 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 DELORES SMITH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit DELORES SMITH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same;

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

COUNT 41 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between March 5, 2014 and June 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to DELORES SMITH and/or the ESTATE OF DELORES SMITH, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to DELORES SMITH in the amount of approximately \$6,166.30. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for DELORES SMITH 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 DELORES SMITH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit DELORES SMITH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 42 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between August 3, 2012 and December 17, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1939, to wit: MARLENE HOMER, by use of a guardianship converting

MARLENE HOMER's money, assets or property, Defendants intending to permanently deprive MARLENE HOMER of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting MARLENE HOMER in the amount of approximately \$11,582.40. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for MARLENE HOMER 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 MARLENE HOMER or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit MARLENE HOMER or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 43 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between August 3, 2012 and December 17, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to MARLENE HOMER and/or the ESTATE OF MARLENE HOMER, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to MARLENE HOMER in the amount of approximately \$11,582.40 Defendants are criminally liable under one or more

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

COUNT 44 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between August 3, 2012 and March 4, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1919, to wit: MARIE LONG, by use of a guardianship converting MARIE LONG's money, assets or property, Defendants intending to permanently deprive MARIE LONG of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting MARIE LONG in the amount of approximately \$10,708.45. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for MARIE LONG 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 MARIE LONG or did not occur, and/or directed Angelica Sanchez and/or Heidi

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

COUNT 45 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between August 3, 2012 and March 4, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to MARIE LONG and/or the ESTATE OF MARIE LONG, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to MARIE LONG in the amount of approximately \$10,708.45. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for MARIE LONG 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 MARIE LONG or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit MARIE LONG or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 46 - EXPLOITATION OF AN OLDER PERSON

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

COUNT 47 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between September 19, 2013 and July 3, 2014 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their possession for a limited, authorized period of determined or prescribed duration or for a limited use, having a value of \$650.00 or more, belonging to RUDY NORTH and/or the ESTATE OF RUDY NORTH, in the following manner, to wit: by working in their role as guardian and fiduciary,

overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to RUDY NORTH in the amount of approximately \$1,449.30. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for RUDY NORTH 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 RUDY NORTH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit RUDY NORTH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 48 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between October 4, 2013 and May 5, 2014 willfully, unlawfully and feloniously exploit an older person having been born in 1938, to wit: RENNIE NORTH, by use of a guardianship converting RENNIE NORTH's money, assets or property, Defendants intending to permanently deprive RENNIE NORTH of the ownership, use, benefit or possession of her money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting RENNIE NORTH in the amount of approximately \$1,449.30. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as

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

COUNT 49 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between October 4, 2013 and May 5, 2014 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their possession for a limited, authorized period of determined or prescribed duration or for a limited use, having a value of \$650.00 or more, belonging to RENNIE NORTH and/or the ESTATE OF RENNIE NORTH, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to RENNIE NORTH in the amount of approximately \$1,449.30. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for RENNIE NORTH 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 RENNIE NORTH or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not

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

COUNT 50 - EXPLOITATION OF AN OLDER PERSON

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

COUNT 51 - THEFT

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

the services or property of another person entrusted to them, or placed in their 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, belonging to HAROLD LOCKWOOD and/or the ESTATE OF HAROLD LOCKWOOD, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to HAROLD LOCKWOOD in the amount of approximately \$4,528.00. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for HAROLD LOCKWOOD 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 HAROLD LOCKWOOD or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit HAROLD LOCKWOOD or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 52 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between May 24, 2013 and January 5, 2015 willfully, unlawfully and feloniously exploit an older person having been born in 1932, to wit: NORBERT WILKENING, by use of a guardianship converting NORBERT WILKENING's money, assets or property, Defendants intending to permanently deprive NORBERT WILKENING of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting NORBERT WILKENING in the amount of approximately \$4,533.20. Defendants

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

COUNT 53 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between May 24, 2013 and January 5, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to NORBERT WILKENING and/or the ESTATE OF NORBERT WILKENING, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to NORBERT WILKENING in the amount of approximately \$4,533.20. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for NORBERT WILKENING 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 NORBERT WILKENING or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit NORBERT WILKENING or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 54 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between June 5, 2013 and November 4, 2013 willfully, unlawfully and feloniously exploit an older person having been born in 1941, to wit: ADOLFO GONZALEZ, by use of a guardianship converting ADOLFO GONZALEZ's money, assets or property, Defendants intending to permanently deprive ADOLFO GONZALEZ of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting ADOLFO GONZALEZ in the amount of approximately \$1,413.60. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for ADOLFO GONZALEZ 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 ADOLFO GONZALEZ or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit ADOLFO GONZALEZ or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson

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

COUNT 55 - THEFT

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

COUNT 56 - EXPLOITATION OF A VULNERABLE PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between August 6, 2013 and August 3, 2015 willfully, unlawfully and feloniously exploit a vulnerable person having, to wit: LINDA PHILLIPS, by use of a guardianship converting LINDA PHILLIPS's

money, assets or property, Defendants intending to permanently deprive LINDA PHILLIPS of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting LINDA PHILLIPS in the amount of approximately \$3,445.26. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for LINDA PHILLIPS 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 LINDA PHILLIPS or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit LINDA PHILLIPS or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 57 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between August 6, 2013 and August 3, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to LINDA PHILLIPS and/or the ESTATE OF LINDA PHILLIPS, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to LINDA PHILLIPS in the amount of approximately \$3,445.26. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or

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

COUNT 58 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between March 3, 2012 and November 30, 2015, willfully, unlawfully and feloniously exploit an older person having been born in 1941, to wit: NORMAN WEINSTOCK, by use of a guardianship converting NORMAN WEINSTOCK's money, assets or property, Defendants intending to permanently deprive NORMAN WEINSTOCK of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting NORMAN WEINSTOCK in the amount of approximately \$15,068.18. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for NORMAN WEINSTOCK 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 NORMAN WEINSTOCK or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK

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

COUNT 59 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between March 3, 2012 and November 30, 2015, willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to NORMAN WEINSTOCK and/or the ESTATE OF NORMAN WEINSTOCK, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to NORMAN WEINSTOCK in the amount of approximately \$15,068.18. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for NORMAN WEINSTOCK 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 NORMAN WEINSTOCK or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit NORMAN WEINSTOCK or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 60 - EXPLOITATION OF AN OLDER PERSON

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

COUNT 61 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between January 1, 2011 and December 31, 2015, willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to MARIA COOPER and/or the ESTATE OF MARIA COOPER, in the following manner, to wit: by working in their role as

guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to MARIA COOPER in the amount of approximately \$6,920.00. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for MARIA COOPER 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 MARIA COOPER or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit MARIA COOPER or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 62 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR did on or between July 5, 2013 and May 4, 2015, willfully, unlawfully and feloniously exploit an older person having been born in 1939, to wit: KENNETH CHRISTOPHERSON, by use of a guardianship converting KENNETH CHRISTOPHERSON's money, assets or property, Defendants intending to permanently deprive KENNETH CHRISTOPHERSON of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby exploiting KENNETH CHRISTOPHERSON in the amount of approximately \$4,290.00. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or

encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for KENNETH CHRISTOPHERSON and overcharged for ward visits, shopping trips, bank deposits, house checks, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit KENNETH CHRISTOPHERSON or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, house checks, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit KENNETH CHRISTOPHERSON or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and GARY NEAL TAYLOR conducted unnecessary services and/or overbilled for services on behalf of A Private Professional Guardian, LLC; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 63 - THEFT

Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR did on or between July 5, 2013, and May 4, 2015, willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to KENNETH CHRISTOPHERSON and/or the ESTATE OF KENNETH CHRISTOPHERSON, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to KENNETH CHRISTOPHERSON in the amount of approximately \$4,290.00. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for KENNETH CHRISTOPHERSON and overcharged for ward visits, shopping trips, bank deposits, house checks, and/or other tasks on behalf of A Private

Professional Guardian, LLC that either did not benefit KENNETH CHRISTOPHERSON or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, house checks, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit KENNETH CHRISTOPHERSON or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and GARY NEAL TAYLOR conducted unnecessary services and/or overbilled for services on behalf of A Private Professional Guardian, LLC; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 64 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between January 1, 2011 and December 31, 2015, willfully, unlawfully and feloniously exploit an older person having been born in 1918, to wit: JOSEPH MASSA, by use of a guardianship converting JOSEPH MASSA's money, assets or property, Defendants intending to permanently deprive JOSEPH MASSA of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby JOSEPH MASSA in the amount of approximately \$5,396.40. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for JOSEPH MASSA and overcharged for ward visits, shopping trips, casino trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit JOSEPH MASSA or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, casino trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit JOSEPH

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

COUNT 65 - THEFT

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

COUNT 66 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between July 1, 2014 and January 6, 2016, willfully, unlawfully and feloniously exploit an older person having

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

COUNT 67 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between July 1, 2014 and January 6, 2016, willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their possession for a limited, authorized period of determined or prescribed duration or for a limited use, having a value of \$650.00 or more, belonging to BLANCA GINORIO and/or the ESTATE OF BLANCA GINORIO, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to BLANCA GINORIO in the amount of

approximately \$2,497.20. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for BLANCA GINORIO 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 BLANCA GINORIO or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit BLANCA GINORIO or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 68 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or between December 31, 2009 and October 7, 2015, willfully, unlawfully and feloniously exploit an older person having been born in 1935, to wit: DANIEL CURRIE, by use of a guardianship converting DANIEL CURRIE's money, assets or property, Defendants intending to permanently deprive DANIEL CURRIE of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$5,000.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby DANIEL CURRIE in the amount of approximately \$8,149.70. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for DANIEL CURRIE 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 DANIEL CURRIE or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit DANIEL CURRIE or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 69 - THEFT

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

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

COUNT 70 - EXPLOITATION OF AN OLDER PERSON

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

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COUNT 71 - THEFT

Defendants APRIL PARKS and MARK SIMMONS did on or between March 1, 2013 and July 10, 2015, willfully, knowingly, feloniously, and without lawful authority, use the

services or property of another person entrusted to them, or placed in their 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, belonging to RITA LAMPPA and/or the ESTATE OF RITA LAMPPA, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits thereby unlawfully converting money belonging to RITA LAMPPA in the amount of approximately \$4,311.20. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for RITA LAMPPA 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 RITA LAMPPA or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, bank deposits, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit RITA LAMPPA or did not occur, and/or directed Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 72 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR did on or about October 31, 2013 willfully, unlawfully and feloniously exploit persons over the age of 60, to wit: CYPRIAN FRASER and/or DONALD GRAHAM and/or HANS SCHOLL and/or ADOLFO GONZALEZ and/or RUDY NORTH, RENNIE NORTH and/or HAROLD LOCKWOOD and/or MARLENE HOMER and/or MARIE LONG and/or MARY VITEK and/or NORBERT WILKENING and/or JACQUELINE NOSBICH, by use of a guardianship converting said victims' money, assets or property, Defendants intending to permanently deprive said victims of the ownership, use, benefit or possession of their money,

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

COUNT 73 - THEFT

Defendants APRIL PARKS, MARK SIMMONS, and GARY NEAL TAYLOR did on or about October 31, 2013 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their possession for a limited, authorized period of determined or prescribed duration or for a limited use, having a value of \$650.00 or more, belonging to CYPRIAN FRASER and/or DONALD GRAHAM and/or HANS SCHOLL and/or ADOLFO GONZALEZ and/or RUDY NORTH and/or RENNIE NORTH and/or HAROLD LOCKWOOD and/or MARLENE HOMER and/or MARIE LONG and/or MARY VITEK and/or NORBERT WILKENING and/or JACQUELINE NOSBICH and/or the estates of said victims, in the following manner, to wit: by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, dropping off toilet paper, and visiting mortuary, thereby unlawfully converting money belonging said victims in the amount of approximately \$1,405.20. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by

directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for the above-listed victims, and overcharged for ward visits, shopping trips, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit the victims or did not occur, and/or directed GARY NEAL TAYLOR to do the same; and MARK SIMMONS documented the same ward visits, shopping trips, and/or other tasks on behalf of A Private Professional Guardian, LLC that either did not benefit the victims or should have been provided by a greatly reduced cost; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

COUNT 74 - EXPLOITATION OF A VULNERABLE PERSON

Defendants APRIL PARKS and MARK SIMMONS did on or about February 20, 2015 willfully, unlawfully and feloniously exploit a vulnerable person having a mental illness, to wit: BARBARA NEELY, by use of a guardianship converting BARBARA NEELY's money, assets or property, Defendants intending to permanently deprive BARBARA NEELY of the ownership, use, benefit or possession of his money, assets or property having an value of more than \$650.00, by working in their role as guardian and fiduciary, overbilling for visits, shopping trips, court filings, and banking visits and/or by withdrawing funds from BARBARA NEELY's account in excess of the amount actually billed to BARBARA NEELY, thereby depriving BARBARA NEELY in the amount of approximately \$895.00. Defendants are criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and by entering into a course of conduct whereby APRIL PARKS acted as guardian for BARBARA NEELY, 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 BARBARA NEELY or did not occur, and/or withdrew excessive funds from the account of BARBARA NEELY, and/or

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

COUNT 75 - THEFT

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

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

COUNT 76 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 77 - EXPLOITATION OF AN OLDER PERSON

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

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

COUNT 78 - THEFT

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

COUNT 79 - EXPLOITATION OF AN OLDER PERSON

Defendants APRIL PARKS, MARK SIMMONS and GARY NEAL TAYLOR did on or between March 7, 2012 and October 7, 2015 willfully, unlawfully and feloniously exploit persons over the age of 60, to wit: over 109 elderly persons under APRIL PARKS'

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

COUNT 80 - THEFT

Defendants APRIL PARKS, MARK SIMMONS and GARY NEAL TAYLOR did on or between March 7, 2012 and October 7, 2015 willfully, knowingly, feloniously, and without lawful authority, use the services or property of another person entrusted to them, or placed in their 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, belonging to over 109 elderly persons under APRIL PARKS' guardianship, in the following manner, to wit: by use of a scheme involving overbilling and/or multiple-billing while making court appearances and/or filing court paperwork for said persons, thereby unlawfully converting money

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

COUNT 81 - THEFT

Defendant APRIL PARKS did on or between April 1, 2012 and August 27, 2013 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 \$650.00 or more, belonging to WILLIAM ARNOLD and/or DOUGLAS JOBSON and/or AUDREY WEBER, AVA MARTIN and/or DAKOTA JONES and/or PATRICIA BROADAWAY, in the following manner, to wit: by use of a false billing scheme involving applications to become a Social Security representative payee for each of the above-named individuals, thereby unlawfully converting money belonging to said persons in the amount of approximately \$1,344.00, and/or by directing Angelica Sanchez and/or Heidi Kramer and/or Sue Pehrson to do the same.

COUNT 82 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 83 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 84 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

COUNT 85 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 86 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 87 - PERJURY

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

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COUNT 88 - PERJURY

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

COUNT 89 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 90 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 91 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

COUNT 92 - PERJURY

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

COUNT 93 - PERJURY

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

COUNT 94 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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COUNT 95 - PERJURY

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

COUNT 96 - PERJURY

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

COUNT 97 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 98 - PERJURY

Defendant APRIL PARKS did on or about March 25, 2016, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting in the guardianship case of JAMES POYA G-11-036043-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 99 - PERJURY

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

COUNT 100 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 101 - PERJURY

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

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

COUNT 102 - PERJURY

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

COUNT 103 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 104 - PERJURY

Defendant APRIL PARKS did on or about May 4, 2015, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with

the Clark County District Court, under penalty of perjury, a Second Annual Accounting and Report of Guardian in the guardianship case of RUTH BRASLOW G-13-038228-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

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COUNT 105 - PERJURY

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

COUNT 106 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 107 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about May 27, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Supplement to Second Annual Accounting and Report of Guardian containing false statements in the guardianship

case of RUTH BRASLOW G-13-038228-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 108 - PERJURY

Defendant APRIL PARKS did on or about May 3, 2016, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a Petition to Approve Final Accounting in the guardianship case of RUTH BRASLOW G-13-038228-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 109 - PERJURY

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

COUNT 110 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 111 - PERJURY

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

COUNT 112 - PERJURY

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

COUNT 113 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 114 - PERJURY

Defendant APRIL PARKS did on or about August 4, 2015 willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with

the Clark County District Court, under penalty of perjury, a First Annual Accounting and Petition for Payment of Fees in the guardianship case of WILLIAM BRADY G-10-035162-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 115 - PERJURY

Defendant MARK SIMMONS did on or about August 4, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of WILLIAM BRADY G-10-035162-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and Petition for Payment of Fees in the guardianship case of WILLIAM BRADY G-10-035162-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 116 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 117 - PERJURY

Defendant APRIL PARKS did on or about March 15, 2016 willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting in the guardianship case of WILLIAM BRADY G-10-035162-A, which document claimed that Defendant was owed fees for

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

COUNT 118 - PERJURY

Defendant MARK SIMMONS did on or about March 15, 2016, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of William Brady G-10-035162-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting in the guardianship case of WILLIAM BRADY G-10-035162-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 119 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 120 - PERJURY

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

COUNT 121 - PERJURY

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

COUNT 122 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 123 - PERJURY

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

COUNT 124 - PERJURY

Defendant MARK SIMMONS did on or about January 9, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees

of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of DELMOND FOSTER G-10-035339-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Second and Final Account and Report of Guardian and/or Petition for Payment of Fees and for Termination of Guardianship in the guardianship case of DELMOND FOSTER G-10-035339-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 125 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 126 - PERJURY

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

COUNT 127 - PERJURY

Defendant MARK SIMMONS did on or about April 3, 2014, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services

provided in the guardianship case of PATRICIA SMOAK G-10-035078-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Second Annual Accounting and Report of Guardian in the guardianship case of PATRICIA SMOAK G-10-035078-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

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COUNT 128 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 129 - PERJURY

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

COUNT 130 - PERJURY

Defendant MARK SIMMONS did on or about April 6, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of PATRICIA SMOAK G-10-035078-A, knowing that

APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Third Annual Accounting and Report of Guardian in the guardianship case of PATRICIA SMOAK G-10-035078-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 131 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about April 6, 2015 willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Third Annual Accounting and Report of Guardian containing false statements in the guardianship case of PATRICIA SMOAK G-10-035078-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 132 - PERJURY

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

COUNT 133 - PERJURY

Defendant MARK SIMMONS did on or about March 8, 2016, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of PATRICIA SMOAK G-10-035078-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Fourth Annual Accounting of Co-Guardian and Final Account of

Former co-Guardian, April L. Parks, Manager of A Private Professional Guardian, LLC, in the guardianship case of PATRICIA SMOAK G-10-035078-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 134 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about March 8, 2016 willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Fourth Annual Accounting of Co-Guardian and Final Account of Former co-Guardian, April L. Parks, Manager of A Private Professional Guardian, LLC, containing false statements in the guardianship case of PATRICIA SMOAK G-10-035078-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 135 - PERJURY

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

COUNT 136 - PERJURY

Defendant MARK SIMMONS did on or about November 14, 2014, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of MARILYN SCHOLL G-13-038909-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of MARILYN SCHOLL G-13-038909-A, which document claimed

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

COUNT 137 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about November 14, 2014 willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of Guardian, containing false statements in the guardianship case of MARILYN SCHOLL G-13-038909-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 138 - PERJURY

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

COUNT 139 - PERJURY

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

COUNT 140 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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COUNT 141 - PERJURY

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

COUNT 142 - PERJURY

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

COUNT 143 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 144 - PERJURY

Defendant APRIL PARKS did on or about March 15, 2016, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of KENNETH EDWARDS G-13-039636-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 145 - PERJURY

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

COUNT 146 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about March 15, 2016, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed,

registered or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and Approve Final Accounting, containing false statements in the guardianship case of KENNETH EDWARDS G-13-039636-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 147 - PERJURY

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

COUNT 148 - PERJURY

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

COUNT 149 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about May 30, 2014, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Fourth Annual Accounting and Report of Guardian, containing false statements in the guardianship case of GLORIA

SCHNERINGER G-09-034019-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 150 - PERJURY

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

COUNT 151 - PERJURY

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

COUNT 152 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about March 23, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Fifth Annual Account and Report of Guardian, Notice of Death of Co-Guardian James N. Schneringer and/or Order for

Confirmation of Investing the wards Funds, containing false statements in the guardianship case of GLORIA SCHNERINGER G-09-034019-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 153 - PERJURY

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

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COUNT 154 - PERJURY

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

COUNT 155 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about March 6, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report of Guardian, containing false statements in the guardianship case of JANICE

MITCHELL G-11-035593-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 156 - PERJURY

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

COUNT 157 - PERJURY

Defendant MARK SIMMONS did on or about August 20, 2014, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of MARY VITEK G-12-037215-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of MARY VITEK G-12-037215-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 158 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 159 - PERJURY

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

COUNT 160 - PERJURY

Defendant MARK SIMMONS did on or about December 18, 2014, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of CECILIA CASS G-13-039449-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of CECILIA CASS G-13-039449-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 161 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 162 - PERJURY

Defendant APRIL PARKS did on or about June 3, 2014, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with

the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of ROY CASS G-13-039443-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 163 - PERJURY

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

COUNT 164 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 165 - PERJURY

Defendant APRIL PARKS did on or about May 8, 2015, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a Second and Final Account and Report of Guardian, Petition for Payment of Fees, For Termination of Guardianship and To Set Aside Estate without Administration, in the guardianship case of CLYDE BOWMAN

06G029707, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 166 - PERJURY

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

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COUNT 167 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 168 - PERJURY

Defendant APRIL PARKS did on or about July 22, 2013, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and

Report of Guardian, in the guardianship case of ROY FRANKLIN G-12-037404-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 169 - PERJURY

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

COUNT 170 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about July 22, 2013, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of Guardian, containing false statements in the guardianship case of ROY FRANKLIN G-12-037404-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 171 - PERJURY

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

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

COUNT 172 - PERJURY

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

COUNT 173 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

COUNT 174 - PERJURY

Defendant APRIL PARKS did on or about June 23, 2015, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a Third and Final Account and Report of Guardian, Petition for Payment of Fees and for Termination of Guardianship, in the guardianship case of ROY FRANKLIN G-12-037404-A, which document claimed that

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

COUNT 175 - PERJURY

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

COUNT 176 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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

COUNT 177 - PERJURY

Defendant APRIL PARKS did on or about March 3, 2015, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of JUANITA GRAHAM G-13-039161-A,

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

COUNT 178 - PERJURY

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

COUNT 179 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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COUNT 180 - PERJURY

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

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

COUNT 181 - PERJURY

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

COUNT 182 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 183 - PERJURY

Defendant APRIL PARKS did on or about November 22, 2015, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a First and Final Account and Report of Guardian and Petition for Payment of Fees and for Termination of Guardianship, in the guardianship case of YOSHIKO KINDAICHI G-13-039448-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 184 - PERJURY

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

COUNT 185 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 186 - PERJURY

Defendant APRIL PARKS did on or about August 21, 2014, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of WALTER WRIGHT G-11-036232-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 187 - PERJURY

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

COUNT 188 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 189 - PERJURY

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

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

COUNT 190 - PERJURY

Defendant MARK SIMMONS did on or about June 23, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A

Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of WALTER WRIGHT G-11-036232-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Second Annual Accounting and Report of Guardian, in the guardianship case of WALTER WRIGHT G-11-036232-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 191 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 192 - PERJURY

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

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COUNT 193 - PERJURY

Defendant MARK SIMMONS did on or about August 27, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of WALTER WRIGHT G-11-036232-A, knowing

that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of WALTER WRIGHT G-11-036232-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 194 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 195 - PERJURY

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

COUNT 196 - PERJURY

Defendant MARK SIMMONS did on or about March 3, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of MARTHA ORNELAS G-13-039145-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and Report of Guardian, in the

guardianship case of MARTHA ORNELAS G-13-039145-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 197 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 198 - PERJURY

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

COUNT 199 - PERJURY

Defendant MARK SIMMONS did on or about July 7, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of MARTHA ORNELAS G-13-039145-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of MARTHA ORNELAS G-13-039145-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in

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

COUNT 200 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 201 - PERJURY

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

COUNT 202 - PERJURY

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

COUNT 203 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 204 - PERJURY

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

COUNT 205 - PERJURY

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

COUNT 206 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about May 28, 2014, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Petition to Terminate

Guardianship and Approve Final Accounting, containing false statements in the guardianship case of LARRY COBLE G-10-035166-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 207 - PERJURY

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

COUNT 208 - PERJURY

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

COUNT 209 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

case

of

LINDA

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

COUNT 210 - PERJURY

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

COUNT 211 - PERJURY

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

COUNT 212 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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COUNT 213 - PERJURY

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

COUNT 214 - PERJURY

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

COUNT 215 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 216 - PERJURY

Defendant APRIL PARKS did on or about May 13, 2016, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of CHARLES MADDERA G-12-038107-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 217 - PERJURY

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

COUNT 218 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 219 - PERJURY

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

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

COUNT 220 - PERJURY

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

COUNT 221 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 222 - PERJURY

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

the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of REX LYONS G-14-040310-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

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COUNT 223 - PERJURY

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

COUNT 224 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 225 - PERJURY

Defendant APRIL PARKS did on or about August 13, 2014, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and

Report of Guardian, in the guardianship case of MARLENE HOMER G-12-037395-A, which document claimed that Defendant was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 226 - PERJURY

Defendant MARK SIMMONS did on or about August 13, 2014, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of MARLENE HOMER G-12-037395-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a First Annual Accounting and Report of Guardian, in the guardianship case of MARLENE HOMER G-12-037395-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 227 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 228 - PERJURY

Defendant APRIL PARKS did on or about February 20, 2016, willfully make a false statement in a declaration made under penalty of perjury, to wit: by offering for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of MARLENE HOMER G-12-037395-A, which document claimed that Defendant was owed fees for

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

COUNT 229 - PERJURY

Defendant MARK SIMMONS did on or about February 20, 2016, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of MARLENE HOMER G-12-037395-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Petition to Terminate Guardianship and Approve Final Accounting, in the guardianship case of MARLENE HOMER G-12-037395-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 230 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 231 - PERJURY

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

COUNT 232 - PERJURY

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

COUNT 233 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 234 - PERJURY

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

COUNT 235 - PERJURY

Defendant MARK SIMMONS did on or about September 29, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees

of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of MARIE LONG G-12-037438-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Second Annual Accounting and Report of Guardian, in the guardianship case of MARIE LONG G-12-037438-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 236 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about September 29, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Second Annual Accounting and Report of Guardian, containing false statements in the guardianship case of MARIE LONG G-12-037438-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 237 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 238 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about May 8, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: an Amended First Annual Accounting of Guardianship Estate of RUDY NORTH, containing false statements in the

guardianship case of RUDY NORTH G-13-039133-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 239 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

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COUNT 240 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 241 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 242 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 243 - PERJURY

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

COUNT 244 - PERJURY

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

COUNT 245 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about August 20, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed,

registered or recorded at Clark County District Court, to wit: a First Annual Accounting and Report of Guardian, containing false statements in the guardianship case of HAROLD LOCKWOOD G-12-037193-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 246 - PERJURY

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

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COUNT 247 - PERJURY

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

COUNT 248 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about December 20, 2014, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Petition of Guardian APRIL

PARKS to Withdraw and Petition for Approval of Fees and Costs, containing false statements in the guardianship case of NORBERT WILKENING G-13-038438-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 249 - PERJURY

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

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COUNT 250 - PERJURY

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

COUNT 251 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about October 30, 2013, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a First and Final Account and

Report of Guardian, Petition for Payment of Fees and For Termination of Guardianship, containing false statements in the guardianship case of ADOLFO GONZALEZ G-13-038316-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 252 - PERJURY

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

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COUNT 253 - PERJURY

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

COUNT 254 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about June 19, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a First Annual Account, Report

of Guardian and Petition for Confirmation of Sale of Personal Property, containing false statements in the guardianship case of DELORES SMITH G-13-039454-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 255 - PERJURY

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

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COUNT 256 - PERJURY

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

COUNT 257 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about March 25, 2016, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed,

registered or recorded at Clark County District Court, to wit: a Petition to Terminate Guardianship and Approve Final Accounting, containing false statements in the guardianship case of DELORES SMITH G-13-039454-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 258 - PERJURY

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

COUNT 259 - PERJURY

Defendant MARK SIMMONS did on or about July 31, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of LINDA PHILLIPS G-08-032515-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a First and Second Annual Accounting Combined and Report of Guardian, in the guardianship case of LINDA PHILLIPS G-08-032515-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 260 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about July 31, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a First and Second Annual Accounting Combined and Report of Guardian, containing false statements in the

guardianship case of LINDA PHILLIPS G-08-032515-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 261 - PERJURY

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

COUNT 262 - PERJURY

Defendant MARK SIMMONS did on or about November 14, 2014, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of LINDA PHILLIPS G-08-032515-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a Third Annual Accounting and Report of Guardian, in the guardianship case of LINDA PHILLIPS G-08-032515-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 263 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 264 - PERJURY

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

COUNT 265 - PERJURY

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

COUNT 266 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

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

COUNT 267 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about July 17, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a Response to Objection to

First Annual Accounting and Report of Guardian and Amended First Annual Account and Report of Guardian, containing false statements in the guardianship case of FRANK PAPAPIETRO G-12-037226-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

COUNT 268 - PERJURY

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

COUNT 269 - PERJURY

Defendant MARK SIMMONS did on or about January 30, 2015, suborn APRIL PARKS to commit perjury, to wit: by falsifying records and/or instructing other employees of A Private Professional Guardian, LLC to falsify records, of the amount and value of services provided in the guardianship case of BARBARA NEELY G-14-040873-A, knowing that APRIL PARKS would knowingly offer for filing with the Clark County District Court, under penalty of perjury, a First and Final Account and Report of Guardian, Petition for Payment of Fees and Termination of Guardianship, in the guardianship case of BARBARA NEELY G-14-040873-A, which document claimed that APRIL PARKS was owed fees for services rendered that were not in fact rendered to the extent and duration claimed, which statement was material to the filing in question.

COUNT 270 - OFFERING FALSE INSTRUMENT FOR FILING OR RECORD

Defendant APRIL PARKS did on or about January 30, 2015, willfully, unlawfully, knowingly and feloniously, procure or offer a false or forged instrument to be filed, registered or recorded at Clark County District Court, to wit: a First and Final Account and Report of Guardian, Petition for Payment of Fees and Termination of Guardianship,

containing false statements in the guardianship case of BARBARA NEELY G-14-040873-A, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada.

DATED this _____ day of March, 2017.

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
ADAM P. LAXALT
Nevada Attorney General
Nevada Bar #012426

BY

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

BY

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

ENDORSEMENT: A True Bill

Foreperson, Clark County Grand Jury

Names of Witnesses and testifying before the Grand Jury:

BISHOP, TODD

EUGENIO, JOSEPHINE

FORD, DIANE

HAYNES, COLIN

KEILTY, EDWARD

KELLY, KAREN

KRAMER, HEIDI

LIEBO, JULIE

NORHEIM, JON

O'MALLEY, JACLYN