

NOV 05 2018

BY, _____
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10 DISTRICT COURT
CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,
13 Plaintiff,
14 -vs-
15 APRIL PARKS,
#1571645
16 Defendant.
17

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

AMENDED
INDICTMENT

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

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

26 COUNT 1 - EXPLOITATION OF AN OLDER/VULNERABLE PERSON

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

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

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

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

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

3 COUNT 2 - EXPLOITATION OF AN OLDER PERSON

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

11 Said older persons are as follows:

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

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

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

8 COUNT 3 - THEFT

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

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

TOTAL: \$69,032.32

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

COUNT 4 - THEFT

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

Said older persons are as follows:

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

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

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

17 COUNT 5 - PERJURY

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

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

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Clark County District Attorney
Nevada Bar #001565

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