

NOV 05 2018

BY, \_\_\_\_\_  
TERI BERKSHIRE, DEPUTY

1 **AIND**  
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3 Clark County District Attorney  
4 Nevada Bar #001565  
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17 Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,  
13 Plaintiff,

14 -vs-

15 GARY NEAL TAYLOR

17 Defendant.

CASE NO. C-17-321808-3

DEPT NO. X

AMENDED  
INDICTMENT

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

20 The Defendant(s) above named, GARY NEAL TAYLOR, is accused by the Clark  
21 County Grand Jury of the crime of **EXPLOITATION OF AN OLDER/VULNERABLE**  
22 **PERSON (Category B Felony - NRS 200.5092, 200.5099 - NOC 50304)**, committed at and  
23 within the County of Clark, State of Nevada, on or between May 2, 2015 and October 7, 2015,  
24 as follows: Defendant did willfully, unlawfully, and feloniously exploit persons over the age  
25 of 60, to wit: over 109 elderly persons under APRIL PARKS' guardianship, by converting  
26 said persons' money, assets, or property, with Defendant intending to permanently deprive  
27 said persons of the ownership, use, benefit, or possession of their money, assets, or property,  
28 having a value of more than \$5,000.00, in the amount of approximately \$74,229.90, by use of

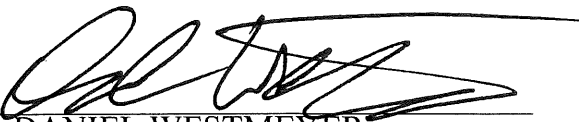
1 a scheme involving overbilling and/or multiple-billing while making court appearances and/or  
2 filing court paperwork for said persons. Defendant is criminally liable under one or more of  
3 the following principles of criminal liability, to wit: (1) by directly committing this crime;  
4 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime  
5 be committed, by providing counsel and/or encouragement and by entering into a course of  
6 conduct whereby APRIL PARKS acted as guardian and directed GARY NEAL TAYLOR to  
7 overcharge for making court appearances and/or filing court paperwork and/or other tasks on  
8 behalf of A Private Professional Guardian, LLC, that either did not benefit the victims or did  
9 not occur; and/or GARY NEAL TAYLOR made unnecessary court trips and multiple-billed  
10 said victims for making these court trips; and/or (3) pursuant to a conspiracy to commit this  
11 crime, with the intent that the crime be committed.

12 STEVEN B. WOLFSON  
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14 BY 

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