

**THIRTY-FIFTH ADJUSTED INVOICE FOR MANAGEMENT FEE
AND LAWFUL DEMAND FOR PAYMENT IN FULL:
18 U.S.C. 1961(5), 1964(c);
ORS 82.010, ORS 124.100**

TO: Risk Manager(s)
Douglas County
1036 S.E. Douglas Avenue, Room 322
Roseburg 97470
Oregon, USA

FROM: People of Douglas County *ex rel.*
Paul Andrew Mitchell, B.A., M.S.,
Private Attorney General: 18 U.S.C. 1964, and
Agent of the United States: 31 U.S.C. 3729 *et seq.*

DATE: June 1, 2020 A.D.

SUBJECT: Douglas County Damages Claim (5/24/2017)

Greetings Risk Manager(s):

This is our INVOICE for the *Management Fee* for RICO Years 6-10 showing on our TRANSMITTAL: DOUGLAS COUNTY DAMAGES CLAIM dated May 24, 2017, as previously served upon your office via Priority U.S. Mail; plus the *Management Fees* for RICO Years 1-5 and RICO Years 11-15; plus adjustments for accrued interest and elder abuse penalties; and, our LAWFUL DEMAND FOR PAYMENT IN FULL:

| Item | Description (see details in <i>Addendum</i>) | Total |
|-------|--|------------------------------------|
| ----- | | ----- |
| 1 | Management Fees (RICO Years 1-15): | |
| | 1% x \$38,711,250 x (2/3): | \$258,075. |
| | 1% x \$42,000,000 x (2/3): | \$280,000. |
| | 1% x \$41,358,681 x (2/3): | \$275,724. |
| | | ----- |
| | Subtotal: | \$813,799. \$813,799.00 USD |
| 2 | financial abuse of vulnerable person, ORS 124.100(2) (a): | x 3.00 |
| 3 | Subtotal: | \$2,441,397.00 USD |
| 4 | 9% simple interest APR: 9% / 12 x \$2,441,397 x 35: | \$640,866.00 USD |
| | | ----- |
| | TOTAL AMOUNT DUE: | \$3,082,263.00 USD ===== |

Simple interest on the above TOTAL AMOUNT DUE began accruing on July 1, 2017 A.D. at the rate of **nine percent (9%) per annum**, as expressly authorized by all applicable subsections of ORS 82.010.

Our terms are payment in full upon receipt of this INVOICE.

Kindly remit the above TOTAL AMOUNT DUE to:

**Paul Andrew Mitchell
c/o Trustee
P.O. Box 3097
Winston 97496
Oregon, USA**

Thank you for your prompt and professional attention to this matter.

Sincerely yours,

/s/ Paul Andrew Mitchell

Paul Andrew Mitchell, B.A., M.S.
Private Attorney General, Civil RICO: 18 U.S.C. 1964;
Agent of the United States as *Qui Tam* Relator (4X),
Federal Civil False Claims Act: 31 U.S.C. 3729 *et seq.*

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Attachments:

Addendum
PROOF OF SERVICE

Addendum:

**Douglas County Damages Claim: Nomenclature
and Schedule of Interest Accruals by Fiscal Year**

| RICO Year | Fiscal Year Ending | Compound Exponent | Comment |
|--------------|--------------------|----------------------|------------------|
| 1 | June 30, 2005 | 1.09 ¹⁵ | yearly @ 9% APR |
| 2 | June 30, 2006 | 1.09 ¹⁴ | yearly @ 9% APR |
| 3 | June 30, 2007 | 1.09 ¹³ | yearly @ 9% APR |
| 4 | June 30, 2008 | 1.09 ¹² | yearly @ 9% APR |
| 5 | June 30, 2009 | 1.09 ¹¹ | yearly @ 9% APR |
| 6 | June 30, 2010 | 1.09 ¹⁰ | yearly @ 9% APR |
| 7 | June 30, 2011 | 1.09 ⁹ | yearly @ 9% APR |
| 8 | June 30, 2012 | 1.09 ⁸ | yearly @ 9% APR |
| 9 | June 30, 2013 | 1.09 ⁷ | yearly @ 9% APR |
| 10 | June 30, 2014 | 1.09 ⁶ | yearly @ 9% APR |
| 11 | June 30, 2015 | 1.09 ⁵ | yearly @ 9% APR |
| 12 | June 30, 2016 | 1.09 ⁴ | yearly @ 9% APR |
| 13 | June 30, 2017 | 1.09 ³ | yearly @ 9% APR |
| 14 | June 30, 2018 | 1.09 ² | yearly @ 9% APR |
| 15 | June 30, 2019 | 1.09 ¹ | yearly @ 9% APR |
| | July 1, 2019 | | monthly @ 9% APR |

**SUMMARIES OF PROPERTY TAX COLLECTIONS FOR 15 FISCAL YEARS
ENDING JUNE 30, 2005 THRU JUNE 30, 2019 (inclusive)**

| RICO Year | Fiscal Year | Personal Property Taxes Certified | Remaining Uncollected | Total Collected |
|--------------|----------------|--------------------------------------|--------------------------|--------------------|
| 1 | 2004-2005 | 2,598,226.85 | - 89,739.82 | = 2,508,487.03 |
| 2 | 2005-2006 | 2,645,065.94 | - 92,462.87 | = 2,552,602.07 |
| 3 | 2006-2007 | 2,910,004.49 | - 85,326.59 | = 2,824,677.90 |
| 4 | 2007-2008 | 3,120,859.92 | - 124,338.25 | = 2,996,521.67 |
| 5 | 2008-2009 | 3,240,746.73 | - 178,495.37 | = 3,062,251.36 |
| | Subtotal: | \$14,514,903.93 | 570,362.90 | 13,944,540.03 |
| 6 | 2009-2010 | 3,226,751.01 | - 228,426.12 | = 2,998,324.89 |
| 7 | 2010-2011 | 3,048,375.54 | - 223,678.54 | = 2,824,697.00 |
| 8 | 2011-2012 | 3,014,572.82 | - 204,801.00 | = 2,809,771.82 |
| 9 | 2012-2013 | 3,163,497.71 | - 234,958.57 | = 2,928,539.14 |
| 10 | 2013-2014 | 3,297,524.24 | - 201,226.48 | = 3,096,297.76 |
| | Subtotal: | \$15,750,721.32 | 1,093,090.71 | 14,657,630.61 |
| 11 | 2014-2015 | 3,391,196.14 | - 182,794.95 | = 3,208,401.19 |
| 12 | 2015-2016 | 2,900,390.01 | - 91,215.37 | = 2,809,174.64 |
| 13 | 2016-2017 | 3,034,749.15 | - 92,235.54 | = 2,942,513.61 |
| 14 | 2017-2018 | 3,128,311.89 | - 84,854.72 | = 3,043,457.17 |
| 15 | 2018-2019 | 3,052,919.85 | - 85,249.94 | = 2,967,669.91 |
| | Subtotal: | \$15,507,567.04 | 536,350.52 | 14,971,216.52 |

Ratio Methodology:

$\$14,000,000 / \$15,750,721 = \sim 0.889$ (RICO Years 6-10)
 $\$14,514,903 \times 0.889 = \$12,903,750$ (estimated overcharges)
 $\$12,903,750 / 5 = \$2,580,750$ per year (RICO Years 1-5) $\times 3 = \mathbf{\$7.74M}$
 $\$15,507,567 \times 0.889 = \$13,786,227$ (estimated overcharges)
 $\$13,786,227 / 5 = \$2,757,245$ per year (RICO Years 11-15) $\times 3 = \mathbf{\$8.27M}$

