

**THIRTY-NINTH 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: October 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:	\$813,799.00 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 39:	\$714,108.00 USD
	TOTAL AMOUNT DUE:	\$3,155,505.00 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 ¹⁶	yearly @ 9% APR
2	June 30, 2006	1.09 ¹⁵	yearly @ 9% APR
3	June 30, 2007	1.09 ¹⁴	yearly @ 9% APR
4	June 30, 2008	1.09 ¹³	yearly @ 9% APR
5	June 30, 2009	1.09 ¹²	yearly @ 9% APR
6	June 30, 2010	1.09 ¹¹	yearly @ 9% APR
7	June 30, 2011	1.09 ¹⁰	yearly @ 9% APR
8	June 30, 2012	1.09 ⁹	yearly @ 9% APR
9	June 30, 2013	1.09 ⁸	yearly @ 9% APR
10	June 30, 2014	1.09 ⁷	yearly @ 9% APR
11	June 30, 2015	1.09 ⁶	yearly @ 9% APR
12	June 30, 2016	1.09 ⁵	yearly @ 9% APR
13	June 30, 2017	1.09 ⁴	yearly @ 9% APR
14	June 30, 2018	1.09 ³	yearly @ 9% APR
15	June 30, 2019	1.09 ²	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) $\times 3 = \mathbf{\$8.27M}$

