

**FOURTIETH 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: November 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
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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 40:	\$732,419.00 USD
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	<b>TOTAL AMOUNT DUE:</b>	<b>\$3,173,816.00 USD</b> =====

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.*

**All Rights Reserved** (cf. UCC 1-308)

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 <sup>16</sup>	yearly @ 9% APR
2	June 30, 2006	1.09 <sup>15</sup>	yearly @ 9% APR
3	June 30, 2007	1.09 <sup>14</sup>	yearly @ 9% APR
4	June 30, 2008	1.09 <sup>13</sup>	yearly @ 9% APR
5	June 30, 2009	1.09 <sup>12</sup>	yearly @ 9% APR
6	June 30, 2010	1.09 <sup>11</sup>	yearly @ 9% APR
7	June 30, 2011	1.09 <sup>10</sup>	yearly @ 9% APR
8	June 30, 2012	1.09 <sup>9</sup>	yearly @ 9% APR
9	June 30, 2013	1.09 <sup>8</sup>	yearly @ 9% APR
10	June 30, 2014	1.09 <sup>7</sup>	yearly @ 9% APR
11	June 30, 2015	1.09 <sup>6</sup>	yearly @ 9% APR
12	June 30, 2016	1.09 <sup>5</sup>	yearly @ 9% APR
13	June 30, 2017	1.09 <sup>4</sup>	yearly @ 9% APR
14	June 30, 2018	1.09 <sup>3</sup>	yearly @ 9% APR
15	June 30, 2019	1.09 <sup>2</sup>	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:	<b>\$14,514,903.93</b>	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:	<b>\$15,750,721.32</b>	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:	<b>\$15,507,567.04</b>	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)  $\times 3 = \mathbf{\$8.27M}$

