

**TWENTIETH ADJUSTED INVOICE FOR DAMAGES CLAIM
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)
Attention: Paul van Dyk
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: April 1, 2019 A.D.

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

Greetings Risk Manager(s):

This is our INVOICE for the *Total Damages* 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 *Total Damages* for RICO Years 1-5 and RICO Years 11-14; 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	Total Damages: RICO Years 1-5: \$38,711,250. Total Damages: RICO Years 6-10: \$42,000,000. Total Damages: RICO Years 11-14: \$33,216,543.	
	Subtotal:	\$113,927,793. \$113,927,793.00 USD
2	9% simple interest APR as of 7/1/2018 (9% / 12 x \$113,927,793 x 9):	\$7,690,126.00 USD
	Subtotal:	\$121,617,919.00 USD
3	Accrued interest, non-seniors: FY 2010-2014 (87% of damaged taxpayers, 5 yrs. @ \$2.8M x 3):	
	\$8.4M x 0.87 x (1.09 ⁹ - 1): \$8,564,196. \$8.4M x 0.87 x (1.09 ⁸ - 1): \$7,253,647. \$8.4M x 0.87 x (1.09 ⁷ - 1): \$6,051,309. \$8.4M x 0.87 x (1.09 ⁶ - 1): \$4,948,247. \$8.4M x 0.87 x (1.09 ⁵ - 1): \$3,936,263.	
	Subtotal:	\$30,753,662. \$30,753,662.00 USD
4	Accrued interest, seniors: FY 2010-2014 (add 3X damages for elder abuse):	
	\$8.4M x 0.13 x (1.09 ⁹ - 1) x 3: \$3,839,122. \$8.4M x 0.13 x (1.09 ⁸ - 1) x 3: \$3,251,635. \$8.4M x 0.13 x (1.09 ⁷ - 1) x 3: \$2,712,656. \$8.4M x 0.13 x (1.09 ⁶ - 1) x 3: \$2,218,179. \$8.4M x 0.13 x (1.09 ⁵ - 1) x 3: \$1,764,532.	
	Subtotal:	\$13,786,124. \$13,786,124.00 USD

Item	Description	Total
5	Accrued interest, non-seniors: FY 2005-2009 (87% of damaged taxpayers, 5 yrs. @ \$2.58M x 3):	
	\$7.74M x .87 x (1.09 ¹⁴ - 1):	\$15,768,721.
	\$7.74M x .87 x (1.09 ¹³ - 1):	\$13,910,715.
	\$7.74M x .87 x (1.09 ¹² - 1):	\$12,206,122.
	\$7.74M x .87 x (1.09 ¹¹ - 1):	\$10,642,275.
	\$7.74M x .87 x (1.09 ¹⁰ - 1):	\$9,207,553.
	Subtotal:	\$61,735,386. \$61,735,386.00 USD
6	Accrued interest, seniors: FY 2005-2009 (add 3X damages for elder abuse):	
	\$7.74M x .13 x (1.09 ¹⁴ - 1) x 3:	\$7,068,737.
	\$7.74M x .13 x (1.09 ¹³ - 1) x 3:	\$6,235,837.
	\$7.74M x .13 x (1.09 ¹² - 1) x 3:	\$5,471,709.
	\$7.74M x .13 x (1.09 ¹¹ - 1) x 3:	\$4,770,675.
	\$7.74M x .13 x (1.09 ¹⁰ - 1) x 3:	\$4,127,523.
	Subtotal:	\$27,674,481. \$27,674,481.00 USD
7	Accrued interest, non-seniors: FY 2015-2018 (87% of damaged taxpayers, 4 yrs. @ \$2.768M x 3):	
	\$8.30M x .87 x (1.09 ⁴ - 1):	\$2,972,030.
	\$8.30M x .87 x (1.09 ³ - 1):	\$2,130,404.
	\$8.30M x .87 x (1.09 ² - 1):	\$1,358,270.
	\$8.30M x .87 x (1.09 ¹ - 1):	\$649,890.
	Subtotal:	\$7,110,594. \$7,110,594.00 USD
8	Accrued interest, seniors: FY 2015-2018 (add 3X damages for elder abuse):	
	\$8.30M x .13 x (1.09 ⁴ - 1) x 3:	\$1,332,289.
	\$8.30M x .13 x (1.09 ³ - 1) x 3:	\$955,008.
	\$8.30M x .13 x (1.09 ² - 1) x 3:	\$608,879.
	\$8.30M x .13 x (1.09 ¹ - 1) x 3:	\$291,330.
	Subtotal:	\$3,187,506. \$3,187,506.00 USD
	TOTAL AMOUNT DUE:	<u><u>\$265,865,672.00 USD</u></u>

Simple interest on the above *Total Damages* began accruing on July 1, 2018 A.D. at the rate of **nine percent (9%) per annum**, as expressly authorized by all applicable subsections of ORS 82.010. (See Items 1 and 2.)

Compound interest was computed for RICO Years 1 thru 5 (FY 2005-2009) on an average of \$2.58M per year for seniors and non-seniors. (See Items 5 and 6, and *Addendum*.)

Compound interest was computed for RICO Years 6 thru 10 (FY 2010-2014) on an average of \$2.80M per year for seniors and non-seniors. (See Items 3 and 4, and *Addendum*.)

Compound interest was computed for RICO Years 11 thru 14 (FY 2015-2018) on an average of \$2.768M per year for seniors and non-seniors. (See Items 7 and 8, and *Addendum*.)

Our terms are payment in full within 30 days of your receipt of this INVOICE.

Proper identification of all eligible payees remains subject to negotiation, mediation or other appropriate dispute resolution ("ADR") technique(s).

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)

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 ¹⁴	yearly @ 9% APR
2	June 30, 2006	1.09 ¹³	yearly @ 9% APR
3	June 30, 2007	1.09 ¹²	yearly @ 9% APR
4	June 30, 2008	1.09 ¹¹	yearly @ 9% APR
5	June 30, 2009	1.09 ¹⁰	yearly @ 9% APR
6	June 30, 2010	1.09 ⁹	yearly @ 9% APR
7	June 30, 2011	1.09 ⁸	yearly @ 9% APR
8	June 30, 2012	1.09 ⁷	yearly @ 9% APR
9	June 30, 2013	1.09 ⁶	yearly @ 9% APR
10	June 30, 2014	1.09 ⁵	yearly @ 9% APR
11	June 30, 2015	1.09 ⁴	yearly @ 9% APR
12	June 30, 2016	1.09 ³	yearly @ 9% APR
13	June 30, 2017	1.09 ²	yearly @ 9% APR
14	June 30, 2018	1.09 ¹	yearly @ 9% APR
	July 1, 2018		monthly @ 9% APR (see Item 2 <i>supra</i>)

**SUMMARIES OF PROPERTY TAX COLLECTIONS FOR 14 FISCAL YEARS
ENDING JUNE 30, 2005 THRU JUNE 30, 2018 (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
	Subtotal:	\$12,454,647.19	451,100.58	12,003,546.61

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) $\times 3 =$ **\$7.74M**
 $\$12,454,647 \times 0.889 = \$11,072,181$ (estimated overcharges)
 $\$11,072,181 / 4 = \$2,768,045$ per year (RICO Yrs 11-14) $\times 3 =$ **\$8.30M**

PROOF OF SERVICE

I, Paul Andrew Mitchell, *Sui Juris*, hereby certify, under penalty of perjury, under the laws of the **United States of America**, without the "United States" (Federal government), that I am at least 18 years of age, a Citizen of ONE OF the **United States of America**, and that I personally served the following document(s):

**TWENTIETH ADJUSTED INVOICE FOR DAMAGES CLAIM
AND LAWFUL DEMAND FOR PAYMENT IN FULL:
18 U.S.C. 1961(5), 1964(c);
ORS 82.010, ORS 124.100**

by placing one true and correct copy of said document(s) in first class United States Mail, with postage prepaid and properly addressed to the following:

Originals:

Courtesy Copies:

Risk Manager(s)

Attention: Paul van Dyk
Douglas County
1036 S.E. Douglas Avenue, Room 322
Roseburg 97470
Oregon, USA

Hostetter Law Group, LLP

Oregon State Bar No. 782477
P.O. Box 400
Enterprise 97828
Oregon, USA

Douglas County Board of Commissioners

Douglas County Courthouse
1036 S.E. Douglas Avenue, Room 216
Roseburg 97470
Oregon, USA

Law Offices of Julie D. Elkins

Oregon State Bar No. 860320
450 Country Club Road, Suite 250
Eugene 97401
Oregon, USA

Kenneth Kuhns & Co.

Certified Public Accountants
570 Liberty Street S.E., Suite 210
Salem 97301-3594
Oregon, USA

[Please see USPS Publication #221 for "addressing" instructions.]

Dated: April 2, 2019 A.D.

Signed: /s/ Paul Andrew Mitchell

Printed: Paul Andrew Mitchell, B.A., M.S.;
Private Attorney General, 18 U.S.C. 1964(c)
(see Rotella v. Wood); and,
Agent of the United States as *Qui Tam* Relator: 31 U.S.C. 3730
(see U.S. ex rel. Madden v. General Dynamics Corp.)

PROOF OF SERVICE

I, Paul Andrew Mitchell, B.A., M.S., hereby certify, under penalty of perjury, under the laws of the **United States of America**, without the "**United States**" (Federal government), that I am at least 18 years of age, a Citizen of ONE OF the **United States of America**, and that I personally served the following document(s):

**TWENTIETH ADJUSTED INVOICE FOR DAMAGES CLAIM
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18 U.S.C. 1961(5), 1964(c);
ORS 82.010, ORS 124.100**

by placing one true and correct copy of said document(s) in first class United States Mail, with postage prepaid and properly addressed to the following:

**Chris Boice
Douglas County Board of Commissioners
Douglas County Courthouse, CH217
1036 S.E. Douglas Avenue
Roseburg 97470
Oregon, USA**

[Please see USPS Publication #221 for "addressing" instructions.]

Dated: April 2, 2019 A.D.

Signed: /s/ Paul Andrew Mitchell

Printed:

Paul Andrew Mitchell, B.A., M.S.;
Private Attorney General, 18 U.S.C. 1964(c)
(see Rotella v. Wood); and,
Agent of the United States as *Qui Tam* Relator: 31 U.S.C. 3730
(see U.S. ex rel. Madden v. General Dynamics Corp.)

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18 U.S.C. 1961(5), 1964(c);
ORS 82.010, ORS 124.100**

by placing one true and correct copy of said document(s) in first class United States Mail, with postage prepaid and properly addressed to the following:

**Tim Freeman
Douglas County Board of Commissioners
Douglas County Courthouse, CH217
1036 S.E. Douglas Avenue
Roseburg 97470
Oregon, USA**

[Please see USPS Publication #221 for "addressing" instructions.]

Dated: April 2, 2019 A.D.

Signed: /s/ Paul Andrew Mitchell

Printed: Paul Andrew Mitchell, B.A., M.S.;
Private Attorney General, 18 U.S.C. 1964(c)
(see Rotella v. Wood); and,
Agent of the United States as *Qui Tam* Relator: 31 U.S.C. 3730
(see U.S. ex rel. Madden v. General Dynamics Corp.)

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by placing one true and correct copy of said document(s) in first class United States Mail, with postage prepaid and properly addressed to the following:

**Michael Kurtz
Human Resources Department
Douglas County Courthouse, CH322
1036 S.E. Douglas Avenue
Roseburg 97470
Oregon, USA**

[Please see USPS Publication #221 for "addressing" instructions.]

Dated: April 2, 2019 A.D.

Signed: /s/ Paul Andrew Mitchell

Printed:

Paul Andrew Mitchell, B.A., M.S.;
Private Attorney General, 18 U.S.C. 1964(c)
(see Rotella v. Wood); and,
Agent of the United States as *Qui Tam* Relator: 31 U.S.C. 3730
(see U.S. ex rel. Madden v. General Dynamics Corp.)