

**SUPPLEMENTAL REQUEST FOR EVIDENCE
OF ALL DOUGLAS COUNTY INSURANCE POLICIES:
FY 2009-2010 to FY 2014-2015**

TO: Douglas County Human Resources Department
Attention: Paul van Dyk,
Risk/Labor Relations Manager
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.

DATE: August 10, 2017 A.D.

SUBJECT: EVIDENCE OF CRIME INSURANCE, Issue Date: 12/15/2016

Greetings Risk Manager(s):

Thank you for your prompt reply to our Public Records Request for copies of Douglas County's liability insurance policies.

A review of your records should confirm that your timely and professional reply did not disclose copies of any CRIME INSURANCE policy(s), however.

Our investigation to date has also obtained a copy of the attached EVIDENCE OF CRIME INSURANCE issued on 12/15/2016 and expired on 7/1/2017. Please see, in particular, the paragraph which states:

... THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, **EXCLUSIONS** AND CONDITIONS OF SUCH POLICIES. [**emphasis** added]

As already explained in our NOTICE OF INSURANCE POLICY EXCLUSIONS, dated August 9, 2017, the People of Douglas County *ex rel.* have a specific need to confirm any and all such exclusions that are expressly stated or implied by all applicable Douglas County insurance policies covering Fiscal Years 2009-2010 to 2014-2015 inclusive.

Please supplement our prior Public Records Request with electronic or printed hard copies of all such other insurance policies for those Fiscal Years.

It is our understanding that Douglas County's insurance policies typically include a contract requirement to notify your insurance providers if and when a formal claim is lodged with your office.

Please accept this SUPPLEMENTAL REQUEST as notice of our intent to notify all such insurance providers of our outstanding DAMAGES CLAIM and Management Fee.

Thank you for your continuing professional consideration.

Sincerely yours,

/s/ Paul Andrew Mitchell

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

Courtesy Copy:

Board of Commissioners
Douglas County
1036 S.E. Douglas Avenue, Room 217
Roseburg 97470
Oregon, USA