



2023-2024 Mock Trial Competition

State of Nevada
v.
Taylor Blair

Thank you

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State of Nevada
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Case Overview

Crowdfunding is a popular way for people to raise small amounts of money from lots of donors who want to help a charitable effort. While a popular crowdfunding platform reports that less than .1% of sites the platform hosts have been fraudulent, crowdfunding raises over \$13 billion annually, meaning millions of dollars are raised under false pretenses. Sometimes, scammers start out small and then target vulnerable donors (often the elderly) to try to get larger sums of money from them. It may even be that a fraudulent scheme starts out innocently to support a good cause but the creator (the person asking for assistance) gets greedy. Unfortunately, there have been many examples of fraud where the perpetrator comes up with a story intended to pull at your heartstrings and, more to the point, pull at your wallet.

This case involves many of the risk factors mentioned above. There is a good cause – helping to pay the costs of special needs dogs, often complicated by the pets being neglected or abandoned. The defendant in the case, Taylor Blair, raised funds through Nevada Nice Pet Rescue’s website and through UfundUs, a crowdfunding site. Blair also personally solicited donations.

Witnesses

The witnesses for the plaintiff are:

- **Ali Caldwell**, a forensic and financial crimes analyst for Rhyolite County who conducted examination of financial records of Nevada Nice Pet Rescue (“NNPR”).
- **Alex Knott**, co-founder of NNPR.
- **J.J. Buchanan**, a donor to NNPR who has accused Defendant of misleading donors regarding use of the funds being donated.

The witnesses for the defense are:

- **Taylor Blair**, defendant and co-founder of NNPR.
- **Jordan Carpenter**, a forensic accountant and former UfundUs employee retained to review investigation of Ali Caldwell and financial records of NNPR.
- **Skylar McMahon**, a Nevada Nice Pet Rescue (NNPR) Volunteer.

Exhibits

- Exhibit 1 – Ali Caldwell Resume
- Exhibit 2 – Ali Caldwell Investigation Report
- Exhibit 3 – Nevada Tax Exempt Organization Search
- Exhibit 4 – Nevada Secretary of State Articles of Incorporation
- Exhibit 5 – Wet Willy’s Pool Services, Inc. Residential Remodel/Construction Contract
- Exhibit 6 – Nevada Nice Pet Rescue (NNPR) Balance Sheet
- Exhibit 7 – Nevada Nice Pet Rescue (NNPR) Financial Statement
- Exhibit 8 – Nevada Nice Pet Rescue (NNPR) Dog Pool Comparison
- Exhibit 9 – Nevada Nice Pet Rescue (NNPR) Dog in Need Pictures
- Exhibit 10 – Nevada Nice Pet Rescue (NNPR) GMC Truck

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6 **IN THE TWELFTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
7 **IN AND FOR THE COUNTY OF RHYOLITE**
8

9 THE STATE OF NEVADA,

10 Plaintiff,

Case No. 23-CR-0036

11 v.

Dept. No. 1

12 TAYLOR BLAIR

13 Defendant.
14 _____ /

15 **INFORMATION**

16 CLARA G. BOW, District Attorney within and for the County of Rhyolite, State of Nevada,
17 in the name and by the authority of the State of Nevada, informs the above-entitled Court that the
18 defendant above-named, TAYLOR BLAIR, has committed the crime(s) of:

19 THEFT, a violation of NRS 205.0832(1)(c), in the following manner:

20 The Defendant, Taylor Blair, within the County of Rhyolite, State of Nevada, did knowingly
21 obtain real, personal or intangible property from J.J. Buchanan, or another person or persons, by a
22 material misrepresentation with intent to deprive J.J. Buchanan or another person or persons of the
23 property, namely, by soliciting and obtaining funds in an amount greater than \$25,000 but less than
24 \$100,000, a category B felony, through the UFundUs crowdfunding platform and through direct
solicitation for funds under the material misrepresentation that said funds would be expended for the

1 care of dogs with medical needs, when in fact said funds were not to be so expended, and that the
2 offense occurred beginning December 1, 2022, until May 1, 2023, all of which is contrary to the form
3 of the Statute in such case made and provided, and against the peace and dignity of the State of Nevada.

4
5 CLARA G. BOW,
6 District Attorney
Rhyolite County, Nevada

7 By: _____
8 George Beldam
9 Bar No. 17990
Deputy District Attorney

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14 TAYLOR BLAIR

15 Defendant.
_____ /

16 **STIPULATIONS**

17 The State and the Defendant have stipulated and agreed as follows:

18 1. All of the transactions between Nevada Nice Pet Rescue (“NNPR”) and/or Taylor Blair
19 and others described in the Witness Statements and exhibits occurred in Rhyolite County, Nevada.

20 2. None of the practices, procedures, and policies of UFundUs described by Jordan Carpenter
21 have changed in any relevant way since Jordan Carpenter left Carpenter’s employment at UFundUs.
22 Carpenter therefore has sufficient knowledge to describe the current practices, procedures, and
23 policies of UFundUs that are discussed in Carpenter’s affidavit.

24 3. Exhibit 1 is a true and accurate copy of the curriculum vitae of Ali Caldwell.

1 4. Exhibit 2 is a true and accurate copy of Ali Caldwell's investigation notes regarding
2 NNPR's revenues and expenses from July 1, 2022, through June 30, 2023.

3 5. Exhibit 3 is a true and accurate copy of the results of searches on the IRS's website for tax-
4 exempt organizations with the names "NV Nice Pet Rescue" and "Nevada Nice Pet Rescue."

5 6. Exhibit 4 is a true and accurate copy of the articles of incorporation for NNPR, signed and
6 filed by Taylor Blair with the Office of the Nevada Secretary of State. Exhibit 4 was submitted by
7 Taylor Blair to the Office of the Nevada Secretary of State.

8 7. Exhibit 5 is a true and accurate copy of a contract between Taylor Blair and Wet Willy's
9 Pool Services, Inc. The contract was signed by Taylor Blair and William Johnson, the owner of Wet
10 Willy's Pool Services, Inc.

11 8. Exhibit 6 is a true and accurate copy of the NNPR's balance sheet for fiscal years 2021-
12 2022 and 2022-2023, which was reviewed by Ali Caldwell. The amounts in the Current Year for
13 Current Assets, Fixed Assets, TOTAL ASSETS, Long-term Liabilities and TOTAL LIABILITIES
14 were edits to the amounts reflected in the accounting system of NNPR and such edits were made by
15 Taylor Blair to the Balance Sheet provided to Ali Caldwell by Taylor Blair.

16 9. Exhibit 7 is a true and accurate copy of a spreadsheet obtained by Ali Caldwell from NNPR
17 regarding NNPR's revenues and expenses from July 1, 2022, until June 30, 2023. Exhibit 7 is a
18 record of activity conducted in the regular course of NNPR's organization and fully satisfies the
19 requirements for admissibility of Rule 803(6) of the Nevada Mock Trial Rules of Evidence.

20 10. Exhibit 8 is a true and accurate copy of two photos. The top photo in the exhibit depicts
21 the same type of swimming pool as that located at the farm at which NNPR kept dogs in April 2022.
22 The bottom photo in the exhibit depicts the same type of swimming pool as that located at the farm
23 where NNPR kept dogs in April 2023, after the type of pool shown in the top photo was removed.
24 The pool of the type depicted in the bottom photo was installed at NNPR in April 2023.

1 The pools and accompanying structures depicted in Exhibit 8 are not the actual pools that
2 were installed at NNPR but are fair and accurate representations of the type of pools installed at
3 NNPR. Either party may offer Exhibit 8 without laying foundation, but Exhibit 8 is admissible for
4 demonstrative purposes only.

5 11. Exhibit 9 is a true and accurate copy of two photos of dogs posted on NNPR's website.
6 Exhibit 9 was posted on NNPR's website as part of the website depicting images of two dogs posted
7 in February or May 2023. The first was of a dog the site indicates was in need of funding for leg
8 surgery and the second was a dog the site indicates was rescued from Texas.

9 12. Exhibit 10 is a true and accurate copy of a photo of the type of GMC Sierra purchased by
10 Taylor Blair in February 2023. The vehicle depicted in Exhibit 10 is not the actual vehicle purchased
11 by Taylor Blair, but it is of the same type and color. Either party may offer Exhibit 10 without laying
12 foundation, but Exhibit 10 is admissible for demonstrative purposes only.

13 13. Silverton is a city located entirely within the confines of Rhyolite County.

14 Dated: October 2, 2023.

15
16 Counsel for the State of Nevada:

17 /s/ Josephine Clark
18 Deputy District Attorney

Counsel for the Defendant:

17 /s/ Alfred LaRue
18 Attorney at Law

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10 **IN THE TWELFTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
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16 Defendant.
17 _____/

18 **JURY INSTRUCTIONS**

19 **Presumption of Innocence**

This is a criminal case, and there are two basic rules you must keep in mind.

20 First, the Defendant is presumed innocent unless and until proven guilty beyond a reasonable doubt.
21 The Defendant is not required to present any evidence or prove his or her innocence.

22 Second, to convict, the State must prove beyond a reasonable doubt the crime was committed and the
23 Defendant is the person who committed the crime. In order to prove that the crime was committed,
the State must prove each element of the crime beyond a reasonable doubt.

24 **Proof Beyond a Reasonable Doubt**

A reasonable doubt is one based on reason. It is not mere possible doubt, but is such a doubt as would

1 govern or control a person in the more weighty affairs of life. If the minds of the jurors, after the
2 entire comparison and consideration of all the evidence, are in such a condition that they can say they
3 feel an abiding conviction of the truth of the charge, there is not a reasonable doubt. Doubt to be
reasonable must be actual, not mere possibility or speculation.

4 **Direct and Circumstantial Evidence**

5 There are two kinds of evidence: direct and circumstantial. Direct evidence is direct proof of a fact,
6 such as testimony of an eyewitness. Circumstantial evidence is indirect evidence, proof of a chain of
7 facts from which you could find that another fact exists, even though it has not been proved directly.
Such evidence may consist of any acts, declarations, or circumstances admitted in evidence tending
to prove the commission of a crime. You are entitled to consider both kinds of evidence. The law
permits you to give equal weight to both, but it is for you to decide how much weight to give to any
evidence.

8 **Credibility of a Witness**

9 To the jury alone belongs the duty of weighing the evidence and determining the credibility of the
10 witnesses. The degree of credit due a witness should be determined by his or her character, conduct,
11 manner upon the stand, fears, bias, impartiality, reasonableness or unreasonableness of the
statements he or she makes, and the strength or weakness of his or her recollections, viewed in the
light of all the other facts in evidence.

12 You should rely in the last analysis upon your own experience, good judgment, and common sense.

13 **Expert Testimony**

14 A witness who has special knowledge, skill, experience, training or education in a particular science,
profession, or occupation is an expert witness. An expert witness may give an opinion as to any matter
in which the witness is skilled.

15 You should consider such expert opinion and weigh the reasons, if any, given for it. You are not
16 bound, however, by such an opinion. Give it the weight to which you deem it entitled, whether that
be great or slight, and you may reject it, if in your judgment, the reasons given for it are unsound.
Such opinion evidence is entitled to neither more nor less consideration by you than any other
evidence.

18 **Theft—Elements**

19 The crime of THEFT BY MISREPRESENTATION consists of the following elements:

- 20 (1) The Defendant knowingly, and without lawful authority;
- (2) Obtains money or other property of another person;
- 21 (3) By a material misrepresentation;
- (4) With intent to deprive that person of the property.

22 A “material misrepresentation” means the use of any pretense, or the making of any promise,
23 representation or statement of present, past or future fact which is fraudulent and which, when used
or made, is instrumental in causing the wrongful control or transfer of property or services. The
pretense may be verbal or it may be a physical act.

1 In order to find the Defendant guilty in this case, you must also find beyond a reasonable doubt that
2 the crime occurred in Rhyolite county.

3 If you find that each of these elements has been proven beyond a reasonable doubt, the defendant is
4 guilty. If you find that any element has not been proved beyond a reasonable doubt, the defendant is
5 not guilty.
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Witness Statement of Ali Caldwell

My name is Ali Caldwell and I am currently employed as a Forensic and Financial Crimes Analyst for Rhyolite County.

I was born in Goldfield, Nevada. My interest in science and numbers began in high school, and I took all the math courses I could. I became fascinated with economics and the way money worked, from individuals to global movements.

I attended college at the University of Nevada, Reno, where I got my bachelor's degree in Criminal Justice in 2019. To be honest, my interest in forensic science and analysis was launched from watching CSI: Crime Scene Investigation while I was in college. I started to look into what it would take to become a crime scene analyst and realized I could merge my love for economics with my CSI dreams – I could become a forensic analyst. Aside from my degree in Criminal Justice, I received a minor in accounting.

I obtained an internship with the Washoe County Judicial Office right out of college. Most of this work was administrative but I did get to review some of the criminal case files. During my internship, I attended graduate school remotely and obtained a Master of Professional Science Degree from Arizona State University, concentrating in the areas of fraud management and economic crimes. After graduating from ASU in 2020, I obtained Certified Forensic Analyst status from the University of Nevada Las Vegas in 2021, with special training in government and forensic accounting. Since then, I have received several certifications and I am an active member of the American Academy of Forensic Sciences (AAFS), where I am a member of the Forensic Document Examination Consensus Body. I have published several articles about financial and forensic analysis in industry journals and blogs.

What I lack in years of experience I have more than made up in quantity: I have worked on hundreds of forensic cases. My career goals are simple: (1) to earn a place on the AAFS Standards Board, to work on improving and distributing accessible, high quality, science-based forensic

standards; (2) to serve the public by serving as an expert witness; (3) to become the head of the FBI Laboratory Services at Quantico.

I became involved with the Taylor Blair case in July of 2023 after receiving a call from my colleague Brad Dexter at the Nevada Attorney General's Office. The AG's Consumer Protection Department had received a complaint from an individual (who I later learned was J.J. Buchanan), who claimed that Blair and Nevada Nice Pet Rescue ("NNPR") ripped them off by claiming to rescue or help special-needs dogs. Turns out there were a lot of people, a lot of money and a lot of suspicious activity. Dexter contacted me to see if we could start a criminal investigation as the AG's Office was unable to do so at the time. I did a review of the information that the AG's office could share with me, discussed the matter with the Sheriff, and obtained authorization to conduct a full investigation of the Blair matter.

My team and I followed standard investigative protocol in reviewing this matter. We interviewed J.J. Buchanan, alleged victim; Alex Knott, volunteer with Nevada Nice Pet Rescue; a Customer Service Representative for UFundUs; and Taylor Blair. Based on the efforts of my team and the analyses we conducted, I submit the following:

1. We reviewed information obtained from both Taylor Blair and NNPR, including all of the organization's computers, and all Blair's digital devices. We had all the organization's and Blair's documents from February 1, 2021 through June 30, 2023. Our financial analysis focused on the 12-month period between July 1, 2022 and June 30, 2023. We also reviewed all of the bank records for NNPR and Taylor Blair.

2. Sometime in the fall or winter of 2020, Blair appears to have rescued and rehabilitated a deceased neighbor's ten dogs. Blair's efforts were covered in local media, and individuals sent Blair donations to assist with the dogs.

1 3. On or about February 2, 2021, Blair filed nonprofit incorporation documents with the
2 Nevada Secretary of State for “Nevada Nice Pet Rescue, Inc.” Investigation revealed that the
3 organization does not have tax-exempt charity status with the IRS. As a result, none of the donations
4 Nevada Nice Pet Rescue can be taken as tax deductions by alleged victims. It is outside of the scope
5 of this analysis to determine whether the alleged victims knew their donations were not tax-
6 deductible and our investigation did not look at any of the tax issues that may have been present.

7 4. Blair put up a website in February 2021 and added UFundUs in June. From July 11,
8 2021 through November 1, 2022, Blair’s UFundUs site obtained 113 donations, only one of which
9 (Buchanan, June 2022) was over \$500.

10 5. From November 1, 2022 through January 31, 2023, there appeared several donations in
11 excess of \$500, including alleged victim Buchanan’s donations of \$1,000 (November), \$5,000
12 (December) and \$25,000 (January). All the funds were deposited in NNPR’s organization checking
13 account.

14 6. As of June 30, 2023, there was \$4,873 in NNPR’s checking account, which was verified
15 by contacting the bank.

16 7. In March 2023, a donation of \$30,000 was received from a donor who requested not to
17 be identified and was unwilling to be interviewed.

18 8. Expenditures: From July 1, 2022 through June 30, 2023, we examined 53 expenditures.
19 The results of the investigation are in the Investigation Notes accompanying the Revenue and
20 Expenditure spreadsheet. Of these transactions, at least 13 appeared to be questionable relative to
21 operating a dog rescue organization, including but not limited to the following:

22 9. December 21, 2022: thank-you holiday dinner party for supporters of Nevada Nice Pet
23 Rescue at Upfront Steakhouse, \$440. Number of attendees: 2
24

1 10. February 2023: \$30,000 withdrawn from NNPR's checking account, allegedly for
2 company vehicle.

3 11. May 7 – 14, 2023: 2 \$150-package tickets to the Westminster Kennel Club Dog Show;
4 round-trip airfare for two to New York, total \$700; 7-day stay at Renaissance Hotel in New York,
5 \$2,173.50; meals for 7 days, \$1,243.74; 2 tickets to an off-broadway revival performance of the
6 musical "Cats," other daily necessities, \$400.

7 12. April 2023: swimming pool installation, \$34,250; purpose unclear (Blair alleges it was
8 for the dogs). We received the invoice that was submitted for the pool purchase and installation.

9 13. Absence of expected expenses: My review of the financial transactions of NNPR did
10 not locate payments for any liability or property insurance for the staff or premises. In addition,
11 based on the number of animals Blair and NNPR allegedly served, an overabundance of food and
12 dog care supplies were ordered. There also seems to be an implication on the UFundUs site of
13 greater staff-to-dog ratios than other documents support.

14 Last, we reviewed NNPR's Balance Sheet, which compares cash, assets, and debts between 2022-23
15 and the prior year, to determine if there were any irregularities. It appears that almost all of the numbers
16 in the 2022-2023 were "amended." Examination revealed that fonts were different, the alignment was
17 off on some numbers, and the document appeared smudged in some places, as if someone had used
18 paint or something to cover up the original numbers. In this age of computers, you don't normally see
19 these types of revisions. In addition, we noted that:

- 20 • Current Assets (cash) appear too high when compared to the cash in bank;
- 21 • Fixed Assets, such as major equipment and property (like the truck in February 2023 and a
22 swimming pool in April 2023) are questionably listed for NNPR;
- 23 • Long-Term Liabilities (debts, long-term loans) did not appear to match up with anything and
24 clearly the Total Liabilities number had been changed.

1 These “amendments” make it look like NNPR has more money than it does.

2
3 I am familiar with the following Exhibits:

- 4 • Exhibit 1
- 5 • Exhibit 2
- 6 • Exhibit 3
- 7 • Exhibit 4
- 8 • Exhibit 6
- 9 • Exhibit 7
- 10 • Exhibit 8

11 I declare under penalty of perjury that everything I have stated in this document is true and correct.

12 Dated October 1, 2023

13 /s/ Ali Caldwell

Witness Statement of Alex Knott

My name is Alex Knott, and until recently, I was the unofficial “vice president” of Nevada Nice Pet Rescue (“NNPR”). I helped build that organization from the ground up. That is why I felt the need to blow the whistle on Taylor Blair.

I was born and raised outside of Philadelphia in a no-fuss family. We never had pets. In fact, I’m allergic to dogs. And that’s fine by me. You have to feed them, water them, walk them, and they track in dirt. I can appreciate that other people like them—and are willing to put their money where their hearts are—but dogs aren’t for me.

I graduated from business school in New York and moved here to make a name for myself. Nevada hosts a large number of Fortune 500 companies. I took a job as an Operations Manager in the healthcare field. I collaborate with business leaders to build and implement strategic solutions that align with our overall management strategy to deliver excellent results across our portfolio of products. I work 60+ hours a week.

I found time, however, to help run a volunteer organization. Volunteering looks great on resumes. I met Taylor Blair in 2020 at the coffee shop where Taylor worked. Taylor was personable and had a good work ethic. It was also clear Taylor really, really cared about animals. When I heard about Taylor rescuing the dogs in November 2020, and saw the donation box on the counter at the Fast Trip coffee shop, I saw an opportunity to combine Taylor’s interests and my business experience.

Taylor wanted to cover the cost of care for the dogs and had difficulty placing them because of their special needs. I might not know dogs, but I know a target market when I see one. I suggested we form a charity to help dogs with disabilities. We would locate needy dogs, facilitate their transport and temporary care, and hopefully find their new “forever home,” using donated money. We tried to personalize it: we posted cute pictures and sent personal letters to our donors. It wasn’t a particularly novel idea to create an animal rescue center but it’s unusual to use disabled animals.

1 Marketing came naturally because of how the local media went nuts over Taylor's 2020 rescue.
2 Taylor had TV interviews, and I pulled some strings for a presentation spot at the Rotary Club in
3 Silverton. Our NNPR website went online in February 2021. I think Taylor and I had sole access in the
4 beginning. One of our supporters suggested the brilliant idea of going through UFundUs. It avoided
5 having to register as a tax-exempt organization with the IRS. The UFundUs information and linked
6 webpage went live in the late spring of 2021.

7 The early donations varied from \$50 – \$500. We had a lot of low level, first-time donors. It felt
8 great, but it's a maxim in running a charity: you will never keep a donor who only donates a little.
9 Someone who donates \$1,000 to an organization will have more interest than someone who simply
10 clicks "donate \$10" on a social media site. Taylor and I spoke about this. Taylor didn't know how to
11 build a brand or have a "strategic action plan." I guess you could say I was responsible for teaching
12 Taylor how to solicit bigger donations.

13 By summer 2022, we had everything up and running. We had a number of volunteers. I never
14 took a salary for my work. I helped primarily with the organization strategy, and Taylor handled the
15 finances. Taylor was responsible for paying bills and expenses, receipt of donations, and served as the
16 primary contact for the donors themselves. I will admit we did not have precise job duties for each
17 person in the organization. Looking back, the right hand didn't know what the left hand was doing.
18 Still, I believe only Taylor and I had moderator access to the NNPR and UFundUs websites, and I
19 certainly had no interest in posting cutesy pictures of dogs, so Taylor must have been the only one.

20 Taylor had a habit in the beginning to run big donations by me. Taylor said "I want to make
21 sure their money is spent on something that matters," or something like that. I would estimate that in
22 the fall and winter of 2022, Taylor asked me about three different donations before processing the
23 receipts. Two of them were from J.J. Buchanan totaling \$1,000 and \$5,000. Taylor wanted to make
24 sure the donations were above board. I reviewed them, and J.J. seemed genuine. Taylor stopped telling

1 me about big donations in late December 2022. At that point, I assumed Taylor finally felt comfortable
2 processing big payments.

3 I knew from the beginning that Taylor lived outside of Oromina, NV. It was perfect for fostering
4 the dogs. Taylor called it “the farm.” I never went there. At least never past the driveway.

5 By January 2023, Taylor began to take more leadership of the organization. I stopped reviewing
6 the transactions and took a backseat role. That was fine by me. Then J.J. Buchanan called me out of
7 the blue. I was surprised to hear how much J.J. had donated. J.J. said Taylor met one-on-one to solicit
8 a large donation. I do not remember seeing or hearing about any individual meetings, and I didn’t think
9 they were justified.

10 J.J. also claimed we fraudulently used the donations. I could not believe it. Our organization
11 was a well-oiled machine. I looked into recent expense reports. Most of them seemed fine. Gas
12 expenses from here to there; standard operational stuff. I recognized some transactions from New York
13 because I went to school out there. I believed those were suspicious. I suppose a charity organization
14 could justify dinner and a show if it led to donations, but I never heard about them, and Taylor never
15 ran any big donations past me. Besides, why would an organization for dogs spend money to see *Cats*!?

16 I then saw the two big transactions in early 2023. The first was the \$32,000 in donations
17 received in January and a \$30,000 expenditure in February. That coincided with Taylor’s new pickup
18 truck. I remember Taylor driving it around and saying how “awesome” it was. I don’t see how a big
19 pickup truck would help the organization. It also seemed fraudulent because—I assume—Taylor told
20 J.J. we were going to spend the money on dogs.

21 Then I saw the expenditure for a pool. I saw it on the revenues and expenses report and found
22 an invoice for it in our organization records. I was shocked. Taylor billed a \$34,000 pool directly to
23 NNPR? And it was conveniently installed in Taylor’s backyard?? The organization kept payment
24

1 records like this for basic expenditures, but still to this day I cannot imagine any legitimate purpose for
2 that pool.

3 I drove to the farm. From the road, maybe 100 yards away, I could see there was a glistening
4 new pool in the back. It was ridiculous. It was fenced in and might have had a cabana. I called Taylor
5 from my car and politely asked what was going on. Taylor said “you don’t get how this works. You
6 never understood. This is how the game works.” Sure, I never handled donors or drove the dogs around,
7 but I cannot imagine how a personal truck, personal flight, and personal pool totaling way over \$50,000
8 could be legitimate expenses!

9 As I drove away, I saw the dog kennels in my rear-view mirror. Taylor had mentioned the week
10 before that NNPR had about a dozen dogs waiting for foster homes. I did not see any dogs out back.
11 Come to think of it, I did not hear any dogs from the road either. To this day I don’t think Taylor had
12 any dogs there. Where was the money going then? That made me angry. It led me to take my
13 information to the Attorney General’s Office.

14 As the unofficial vice-president of the organization, I hope to take it over and legitimize it. We
15 had a solid plan and marketing strategy—I would know, I developed it—and I plan to expand it into
16 something grander than before. Maybe with all this good press I can run for local office one day. It’s a
17 dog-eat-dog world out there, and I felt that people should know what I saw.

18 I am familiar with the following Exhibits:

- 19 • Exhibit 4
- 20 • Exhibit 5
- 21 • Exhibit 6
- Exhibit 7
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22 I declare under penalty of perjury that everything I have stated in this document is true and correct.

23 Dated: October 1, 2023

/s/ Alex Knott

Witness Statement of J.J. Buchanan

My name is J.J. Buchanan. I am 74 years old and have lived in the same house I was born right here in Silverton. When I was young, my parents would not let me have a dog in their “nice house.” Once they had passed, I took in a Chihuahua from the pound. The dog’s name was Tuffy; Tuffy always looked prime for a fight, but he was a sweetie and was protective of me and my house. I have never been married.

As Tuff got older, he started to have health problems. I was living on a pension and started to sell some of the antiques around the house to pay for a veterinarian. Tuff passed when he was 11 in his own little bed one night in August 2021. I spent thousands of dollars on keeping this dear doggie alive and began to wonder what poor people did – did they just have to let their dogs suffer and die? I thought if I ever had the money, I would try to help poor people care for their dogs.

And then I came into some money and tried to find a way to help dogs. I told the pound that I wanted to care for an aging, even sick doggo. Now I have Sammy, another three-legged Chihuahua. Sammy likes to stay in the house all day, which is fine by me.

A few months later, somebody at the pound told me about the internets having a thing where people tried to get help for their sick doggo. I came upon a UFundUs page when I searched for ‘sick dogs.’ A group called Nevada Nice Pet Rescue was seeking funds to help a dog get dental surgery. They had matched up with a dog dentist in Las Vegas and were able to provide supplies and treatment but wanted \$500 to get the dog there and back, and pay for a hotel and gas and kenneling at the pet hospital. They had a photo of the poor dog named Toby with its teeth all mangled. I took a deep breath and sent the \$500 by computer pay. They sent me a photo of the dog after the surgery. I printed it out and taped it on my fridge. The person from the organization, Taylor Blair, sent me a nice thank you card. The return address was from Oromina here in Rhyolite County. My first donation was in June 2022.

1 So I kept looking at either the UFundUs or the NNPR website webpage. Taylor Blair lived in
2 Nevada, and was helping dogs all over the state. Some had extreme health needs and needed surgery,
3 others were in need of adoption because their owners could not care for them. Sometimes they delivered
4 food and paid for a dog's medication.

5 In November of 2022 I donated \$1,000 to help a dog named Sparky in Tonopah who needed
6 daily insulin shots – just like me! I still have the dog's photo right where I can see it. Sparky passed
7 and Blair forwarded a lovely thank you card from the owner, saying that I extended Sparky's life many
8 months. They sent me a nice photo of Sparky, which is on my fridge. It seems like there was a doggo
9 in distress every few days.

10 Then next month, December 2022, I helped finance a dog rescue operation in a hurricane zone.
11 Nevada Nice brought the dogs to Nevada. I donated \$5,000 to that worthy cause.

12 Just a few weeks later, in January 2023, Taylor Blair wanted to come to my house, right here
13 in Silverton. We visited and had coffee in the living room. Blair explained they had been basically
14 running the rescue operation all alone. Blair wanted to expand into a regular charitable organization.
15 Blair wanted to build some nice kennels on a farm to house the animals waiting for adoption. There
16 would even be a doggie pool for dogs with leg problems so they could help the dogs exercise.

17 Nevada Nice would find other caring folks, just like me, to help out. Blair said people would
18 be more trusting in contributing to an organization with a fancier website and photos. Blair asked if I
19 could find it in my heart to donate \$25,000. I told Blair I would have to think about it, as that would be
20 the last of my money. Blair quickly pointed out that with an actual organization, people could include
21 property and cash in a will. Blair said they would put a big photo of me in the lobby or office. It would
22 be framed with my name and a caption, "J.J. Buchanan: A dog's best friend." Well, I was hooked and
23 gave a check for \$25,000 to Blair, even though it drained out most of my available cash.

1 After that I was too sad to look at the website; I did not want to see doggos I could not help.
2 Finally, in February 2023, I went back to the Nevada Nice website and they had a gallery of dogs that
3 needed help and dogs that had been helped. If you clicked the dog's photo, you could read their story.
4 Well, what do you know – there's Sparky from Tonopah! I click the photo and they say his name is
5 Gus and he had leg surgery. No, Sparky kept his legs. I went to the fridge and got Sparky's photo –
6 same photo! Same coloring. Same background!

7 And imagine my surprise a few months later when I saw a picture of Toby, the dog I paid to get
8 his teeth fixed, but this time he was called Kirby and the website said he was rescued from Texas. I
9 reviewed Exhibit 9 and the top picture is of Sparky which the website called Gus and the bottom picture
10 is of Toby which the website called Kirby. I was very confused and began to feel a bit strange about
11 the whole thing.

12 Also on the website was a photo of a kennel on a farm. The farm was "near Oromina". What if
13 that was wrong too – or worse. A fake. So I drove out that way and with the help of a friendly Rhyolite
14 County deputy, I got directions and went to the farm. There was an outdoor kennel with some dogs
15 next to a nice, new metal pole building. I was too shy to drive in. I did see a big shiny new GMC truck,
16 I think it is a Sierra model. When Blair came to my house, Blair was driving an old Chevy truck. Now
17 this situation might prove me a fool, but I am not a complete fool. I watch TV! Those big 4-door GMCs
18 are fancy, expensive things that can cost more than my house is worth. Exhibit 10 looks like the big,
19 fancy GMC truck that I saw out at the farm.

20 And then I saw Taylor Blair, unloading groceries from the back and taking them into the house
21 – NOT the metal pole building! And I could see there was a new-looking swimming pool. I know
22 those don't come cheap. The bottom picture in Exhibit 8 is what the pool I saw looked like. I drove
23 back home mad as a hornet!

1 I called Blair, who said they could explain – the GMC was for the dogs! I did not believe Blair.
2 A new Chevy van would cost half of what a GMC cost. Finally, I said that I felt cheated out of all my
3 money and was going to do something about it. I was embarrassed so instead of calling the cops, I
4 started making phone calls and eventually I talked to a person that works for the State and that's
5 why I'm making my statement. Finally, someone is going to get to the bottom of this. I may decide to
6 bring a civil suit to recover the money Blair tricked me out of.

7 I am familiar with the following Exhibits:

- 8 • Exhibit 8
- Exhibit 9
- 9 • Exhibit 10

10 I declare under penalty of perjury that everything I have stated in this document is true and correct.

11 Dated October 1, 2023

/s/ J.J. Buchanan

Statement of Taylor Blair

My name is Taylor Blair and I am the defendant in these proceedings. I was born in 1999. I have a brother who is two years older than me and my sister who is three years younger. I grew up on a hog farm outside of Oromina. My mom and dad operated under a production contract with the SnugSnouts Pork Company. The company provided the hogs and the feed and my folks provided the farm and the labor. That labor included me and my siblings. Mom and Dad got paid based on the number of hogs that went on to the company's processing plants in the area.

It wasn't an easy life for my folks, especially when pork consumption decreased because of all these PETA people protesting conditions and talking about the environment. Eventually my parents lost the farm, split up, and moved apart. My dad took off to California, and my mom moved us to live with Grandma and Grandpa in Las Vegas.

Living on the farm had one advantage and that is all of the pets we had. I showed rabbits in 4H, but my real love was my dogs. I read books and got really good with training our dogs. When we moved into town, we could only keep one and I picked Sydney, an Australian Cattle Dog/German Shepherd cross. I had taught him to do tricks and things.

I did okay in school, but knew we didn't have the money to send me to college. I met with an army recruiter and she said with my skills at training my dog I could become what they call a Military Working Dog Handler. Well, as they say, "sign me up!" I wish I would have read the fine print. I graduated from Goodman High School in June of 2018 and it was off to Fort Leonard Wood in Missouri, where I did ten weeks of basic training and then seventeen weeks of advanced training at the Military Police school there. I made private first class and finally attained my dream assignment to attend the eleven-week basic military dog handler course at Lackland Air Force Base in San Antonio, Texas. I thought I knew how to train dogs, but I had no idea how much work and patience it takes. The

1 obedience work-up for basic patrol work was okay, but learning to train a dog to detect explosives was
2 a ton of work. I got through it and graduated.

3 After that I was deployed to Afghanistan. While in Afghanistan, I worked with Eddie, a two-
4 year old Dutch Shepherd/Belgian Malinois cross. It took a while for us to bond. We worked together
5 well and I opted to do two tours of duty of nine months each just to be with Eddie. That all changed on
6 February 22, 2020. While on patrol in a village near Bagram air base we were searching for improvised
7 explosive devices when we came under attack. Eddie and I were hit by Molotov cocktails. Eddie was
8 severely burned and lost his left eye. I got burned a bit smothering the flames. We got medevacked by
9 helicopter back to the base.

10 With his injuries, Eddie was no longer able to continue in service and the veterinarian was going
11 to put Eddie down. I wasn't going to allow that to happen, and I guess I lost it and threatened the doctor
12 and his staff that if they tried to put Eddie down, he was not the only one going home in a body bag. It
13 was a whole ordeal, but they agreed to treat Eddie and allowed me to adopt him. I was also facing a
14 court-martial and prison time for my threats. Luckily my mom contacted our congressman and he
15 stepped up and got me a deal and I received an "other than honorable discharge."

16 My "other than honorable discharge" from the Army made it so I would not get the education
17 benefits for which I had enlisted. So there I was, twenty years old, broke, no job or idea what I should
18 do next. I moved in with Mom and got a job as a cashier at the Fast Trip coffee shop just over the
19 county line on Highway 95, doing the overnight shift. Got a little scary at times, but the manager let
20 me keep Eddie with me behind the counter and even though he only had one eye, a look from it and
21 his growl would keep anyone from trying to pull something.

22 I saved up enough and started classes at Sagebrush Community College and was able to rent an
23 old farmhouse outside of Oromina. Heading home from work in the early morning of November 23,
24 2020, I saw a bunch of emergency flashers in the distance and as I got closer, I saw two fire trucks and

1 a sheriff's deputy's car in front of Old Man Jensen's place. It was on fire. I stopped to see if I could
2 help, as I had gotten to know Jensen pretty well from helping with his groceries and his ten dogs.
3 Luckily the EMTs were able to get Jensen out of the house quickly, but he had been in the house awhile
4 and nobody knew if he would recover. While I was there, one of the deputies I knew from the Fast Trip
5 asked if I would be willing to take Jensen's dogs in with me while they sorted out what was going to
6 be done with them if Jensen didn't make it. I agreed and we got all ten of them over to the farmhouse
7 I was renting. Couple days after Jensen's funeral, I got a call from Sheriff Griffith that the county's
8 animal control folks would come by to pick up Jensen's dogs and take them in to be put down unless I
9 could find a rescue shelter for them.

10 I called my veterinarian, and she made a house call to come check out the dogs. They were not
11 in the best of shape. One was blind, another was diagnosed as being diabetic needing insulin injections.
12 One of the dogs was burned in the fire and had a burn on her leg that was so bad the vet said it was
13 going to have to be amputated. The other six were mostly just old and tired. I went online and found a
14 few dog rescue places, but they were only willing to take the three healthy younger dogs.

15 There was just no way I was going to put down the other seven. Then again, I was going to
16 have a hard time paying the vet bills on the little I was making at the Fast Trip, what with rent on the
17 farmhouse and my tuition. My boss let me put a donation box with pictures of the dogs out when I was
18 working and was okay with my asking folks to put their change in to help with the bills for the dogs.

19 Soon after I put out the donation box, I spoke with one of the regulars at Fast Trip, Alex Knott,
20 about ways we might do more to get money to help care for Jensen's dogs. Alex was some kind of
21 administrator at a hospital or something like that.

22 Then one day a reporter from the local TV news showed up and asked to interview me and my
23 boss about my fundraising efforts. Fast Trip agreed to match the funds I raised. The day after the story
24 aired, Fast Trip got calls from folks wanting to donate; some wanted to adopt the dogs with health

1 conditions while others wanted us to take in dogs that they could no longer care for and couldn't find
2 a rescue place to take them in. When I heard this, I called Alex with the news and we agreed we needed
3 to take advantage of the good press and start up a bigger thing.

4 With the funds, I was able to install kennels for 20 dogs behind the farmhouse. My landlord
5 even helped put in some insulation and install windows donated by a local building supply store.

6 Alex finagled an invitation for us to speak at the Silverton City Rotary Club's lunch meeting
7 on February 1, 2021. I brought Eddie and Jensen's four remaining dogs (three got placed with good
8 folks with big hearts willing to take in a dog with challenges). I used Eddie to show what a dog with
9 physical impairments could still do and how loving and attentive the other four could be. Alex
10 mentioned in our presentation that we wanted to help other dogs with special needs. After the meeting,
11 the local General Motors dealer offered to help and suggested we use UFundUs to raise funds, while
12 one of the other Rotarians suggested we form a non-profit corporation to which donations could be
13 made.

14 Alex and I were thrilled that it looked like our dreams were about to come true. On the drive
15 home I called Alex while Alex was driving back to work and we decided on the name "Nevada Nice
16 Pet Rescue" or "NNPR" for short. When I got home, I completed the necessary documents on Nevada's
17 Secretary of State site to form the non-profit corporation and when Alex got to work, Alex logged into
18 GoMommy.com to get us a website and email addresses.

19 By the end of May 2021, we were ready to start raising funds with UFundUs. We initially
20 sought \$20,000 to build additional kennels and to feed and provide veterinary care for the dogs we
21 anticipated rescuing. Well, we exceeded our goal! We were contacted by people wanting to volunteer,
22 rescue operations across the state similarly struggling with placing dogs with disabilities, and requests
23 from older folks on fixed incomes who could not afford medical care for their pets. At Alex's
24 suggestion, we reopened fundraising for these requests, and would sometimes fund single surgeries

1 through a veterinarian we knew, or other times we would continuously pay the cost of pet medication
2 an owner could not afford.

3 NNPR was a lot of work and I could not have done it without Alex and other volunteers. We
4 had volunteers who helped with fundraising, with the website. Some would come out to the farm to
5 walk, feed, and water the dogs, and give them some personal attention. Other volunteers delivered dogs
6 to their new homes.

7 Sadly, some of our dogs would never be placed because their needs were so great, so we
8 continued caring for them for the rest of their lives. To thank the volunteers, NNPR hosted a volunteer
9 holiday dinner at Upfront Steakhouse in December 2022.

10 At the end of 2022, I quit my job at Fast Trip to devote my full time and energy to NNPR. I
11 started drawing a salary to replace what I was making at Fast Trip and have NNPR cover the rent on
12 the farm. I figured since so much of the farmhouse and the land was being used for NNPR operations,
13 this was reasonable and I got to live there for free as the caretaker.

14 In terms of the NNPR facilities, we started 2021 with kennel facilities for 20 dogs located in
15 the renovated granary that was funded by Fast Trip matching donations and contributions from a local
16 building material supplier. In the spring of 2022, we spent a couple thousand dollars to install an above
17 ground pool to be used by the dogs for exercise. It was very beneficial for dogs with mobility issues;
18 a volunteer could get into the pool with the dog and allow them to exercise. We obtained a donation of
19 flotation devices for the dogs from a flotation device manufacturer in the area.

20 In July 2022, we obtained a \$10,000 grant from Friends of Furry Friends to acquire and install
21 a metal pole building on vacant land next to the granary. This allowed us to increase our kennel capacity
22 to 45 dogs. We needed the capacity as we were taking in more dogs and some were going to have to
23 stay with us.

1 In December 2022, we received another grant of \$15,000 (this time from Doggy Delish Co.).
2 My old truck was on its last legs at that point so we used these funds to buy a new GMC Sierra 2500.
3 I had some GM credit card points I was able to use on a new car (GM bucks), and GM was also offering
4 0% financing for the balance. I thought \$62,000 was a lot of money, but with the grant money and GM
5 bucks and no interest on the financed balance, NNPR could swing it. I said yes, but asked for a little
6 time to sign up the paperwork while I sought out some additional donations. The GMC Sierra may look
7 a bit extravagant for the rescue, but it is great for carrying kennels. It also makes a better impression
8 when meeting with potential donors.

9 While NNPR was doing well, our costs were high. In an effort to raise more money to fund our
10 hospice program, Alex suggested I start tracking donor support and then reach out to repeat
11 contributors, especially for larger sums.

12 An example of this would be J.J. Buchanan. Buchanan first donated \$1,000 in the summer of
13 2022 to support a dental surgery for a dog who had had its teeth severely damaged in an accident. I
14 sent a personal thank you card to Buchanan and enclosed a photo of the dog with the repaired teeth.
15 Buchanan next provided ongoing funding to cover the cost of insulin for a diabetic dog either through
16 our online donation portal or UFundUs. They also supported our efforts to rescue dogs following a
17 hurricane in Florida. When our records showed it had been a while since Buchanan donated, I arranged
18 to visit Buchanan at home in an effort to move Buchanan to major donor status with funds not tied to
19 a specific appeal. During the visit in January 2023, Buchanan donated \$25,000.

20 When I got to my car and looked at the check, I realized it was payable to me and not NNPR. I
21 didn't want to go back inside and ask Buchanan to replace it, so I just put it into the NNPR bank
22 account. I believe this was in January 2023.

23 I was shocked to later learn that Buchanan claims we somehow stole the money. Buchanan's
24 donations were made voluntarily.

1 Look, I am no accountant, so I maybe didn't do the best job with the books and records of
2 NNPR, but I firmly believe we always did what was best for the dogs.

3 Sure, I get it that spending money on a trip to the Westminster Kennel Club show in May 2023
4 may look suspicious, but I was trying to get NNPR to the next level, and going to New York for that
5 show put me in touch with representatives from dog food companies and others who could support us
6 in our efforts to rescue dogs with disabilities. We may not have secured any immediate funds, but I
7 made contacts with potential donors. The only regret I have was going to see the play *Cats*, it was an
8 abomination. I just don't get what is so wonderful about a bunch of actors dressed up like cats singing
9 and dancing.

10 I also get that someone may question why we spent nearly \$35,000 on a therapy pool for the
11 dogs in April 2023 when we had a pool already. Again, I was positioning us to make the NNPR facilities
12 more inviting for larger donors who might come to see what we were doing before they made a more
13 substantial contribution. The new pool was so much more accommodating for socializing around the
14 pool while the dogs were exercising in it. We also had a volunteer and donor recognition pool party in
15 June 2023, which I had catered by Fast Trip.

16 I have seen, but do not fully understand Exhibit 2. I am familiar with Exhibits 3, 4 and 5. I
17 prepared Exhibit 6, including the corrections in it and Exhibit 7. I believe Exhibit 9 is a photograph of
18 the dog that J.J. Buchanan contributed funds to fix her teeth and the dog that Buchanan covered the
19 cost of the insulin for. Exhibits 8 and 10 look like photographs of the new therapy pool at NNPR and
20 the GMC Sierra truck NNPR purchased in January 2023.

21
22 I declare under penalty of perjury that everything I have stated in this document is true and correct.

23 Dated October 1, 2023

24 /s/ Taylor Blair

Statement of Jordan Carpenter

I am Jordan Carpenter. I'm 44 years old, and I live in Oakland, California, where I work as a forensic accountant. I work most often on a contract basis with various law enforcement agencies and private parties, such as companies, law firms, and private citizens to investigate possible instances of accounting fraud, theft, embezzlement, or tax anomalies. I used to work in the California Attorney General's Office as a forensic accountant and fraud investigator for the California Medicaid program, called Medi-Cal. Then I was employed as an internal fraud investigator for the corporation UFundUs, which is headquartered in the Silicon Valley, south of San Francisco.

I have two degrees: a bachelor's in business administration, from the University of Nevada, Las Vegas, and a master's in accounting from California Polytechnic State University-San Luis Obispo. I am also a licensed certified public accountant (CPA).

After school, I started my career in private practice as a staff accountant, working under a CPA at her small firm. After three years, I took the CPA Examination and became a licensed CPA myself. Following that, I was hired by the California Department of Justice in the Medi-Cal investigations department, where I worked for more than ten years.

Medi-Cal is a system for giving monetary and medical aid to patients who qualify for the program. My time in the Medi-Cal unit was spent auditing behavior of organizations, companies and individuals who applied for funding through the Medi-Cal system. I did a large variety of auditing to determine if there was evidence of Medi-Cal funding misuse or malfeasance. When appropriate, we would recommend cases for civil actions or criminal charges against wrongdoers who defrauded the Medi-Cal system. I have handled hundreds of these cases.

In 2016, I joined UFundUs, as an internal fraud investigator. UFundUs helps connect individuals in need of financial help with willing donors, through a website portal system. Users can create accounts with a profile picture and an about-page identifying the reason they seek donations;

1 they may send messages to other users on the platform. Donations can be open or anonymous. The
2 donations are provided using a special financial interface that partners with credit card and checking
3 account security apps. I am highly familiar with UFundUs's operations because I worked for them from
4 2016 to 2020.

5 Currently, I work in private practice as a consultant. I have been retained by the defense in this
6 case. They have paid me an agreed-upon sum of \$200 per hour of work on this case. To date, I have
7 billed 22 hours of work on this case. I am also charging an additional flat fee of \$5,000 to testify at trial
8 as a witness in this case, because I will have to fly to Nevada and stay at a hotel for several days.

9 10 **UFundUs Operations**

11 UFundUs does important work, and it is hard to put into words how many people have been
12 positively impacted by its services. People in need of medical treatment; people struggling with debt
13 such as an underwater home mortgage; victims of horrible crimes seeking help with funeral costs and
14 family support; and people needing to fund legal cases will ask UFundUs users for help. UFundUs has
15 also been used to help wounded, sick, mistreated, or un-housed animals. Pet-related donations
16 comprised between ten and twenty percent of all UFundUs donation pages during my time with the
17 company.

18 I am aware of instances of fraud at UFundUs before, with some involving large sums of money.
19 I am bound by a non-disclosure agreement with UFundUs that I signed after I left the company, so I
20 cannot tell you how much fraud I witnessed, but there have been some well publicized examples in the
21 news. In many obvious cases, UFundUs swiftly worked to shut down the account, ban the individual,
22 and do its best to return funds to the victims.

23 My time in the internal fraud unit at UFundUs involved less actual auditing and more user
24 activity analysis. What I mean by that is my team was mostly in charge of reviewing user accounts

1 (rather than bank accounts) on UFundUs's online system for allegations of fraud. I would review a
2 user's history on the website, including both their openly visible and their hidden user history, for
3 anomalies that indicated fraud. Most of my internal fraud reviews were done in response to an official
4 fraud or scammer report that any user on UFundUs can file when they believe a different user has
5 violated the terms of service of the website or committed a crime.

6 Since 2016, a typical fraud report looks like this: one user would view another user's donation
7 request page, where the requesting party must explain in however many words and pictures they want
8 as to why they are seeking donations. If the user reading the page believes the post is fraudulent, they
9 may click a reporting button that pulls up a menu of options for reporting the user. The reporting party
10 may describe in no detail or a lot of detail why they believe the page is fraudulent. A team of staff
11 would then screen those reports on a daily basis, and someone in my position would then receive the
12 reports that were determined to be in need of advanced review.

13 One important way I would review cases of possible fraud at UFundUs is by considering how
14 many different times a user has been reported for fraud. A more apparent case for fraud will typically
15 have dozens or even hundreds or thousands of fraud reports very quickly, sometimes in a single day,
16 simply due to the fact that news is viral on the internet, and the internet hive-mind likes to punish
17 anyone pretending to be in need of charity help.

18 Another way I would review cases for fraud is by checking the user's prior records. What kind
19 of aid are they requesting? How often do they request it? Are they asking for help with a dog shelter
20 on day one, and then asking for help to build a school on day thirty? Do their posted photos and other
21 materials appear consistent? You would be surprised how easily we could catch fraud. Sometimes users
22 would copy-paste a photograph from a years-old animal shelter into their brand-new rescue request.

23 When we detected a case we believed to be fraudulent, we then had to take two steps: shut down
24 the account, and take legal action against the user. This usually meant referring a report to the police.

1 It was not my role at UFundUs to obtain a user's finances with their bank accounts; that's something
2 only a law enforcement organization can receive, by means of a warrant or a subpoena.

4 **The Taylor Blair Case**

5 As I said above, I was retained as an expert witness by Taylor Blair's defense team, due to my
6 expertise in UFundUs cases. My role was specifically to review the accounting information obtained
7 by the prosecution and try to make a determination of whether there was evidence of malfeasance by
8 Taylor Blair through Blair's UFundUs applications or bank accounts. Thus, my work in this case was
9 spent reviewing the reports and paperwork compiled by Ali Caldwell rather than affidavits of other
10 witnesses in this case.

11 I will first note that I saw nothing indicating Taylor Blair falsified images or stories about
12 animals in need of help, as was typically the case in fraud cases I discovered at UFundUs. Blair was
13 also very consistently asking for help with pet-related donations.

14 Investigators need to remember that one of the questions is whether Taylor Blair actually lied
15 about these animals and whether they were in need of help. I found no evidence that Ali Caldwell
16 reviewed suggesting that any of these funding requests were faked. Worse, Ali Caldwell actually
17 uncovered evidence that many of these donations were real. Caldwell even notes that Blair's efforts
18 were even recognized in 2020 by local media.

19 Turning to the accounting issues specifically, I can summarize the problems with the State's
20 case like this: just because there is unexplained accounting history does not mean the behavior is fraud.
21 A very important thing to remember with alleged UFundUs fraud specifically is that most of these
22 people asking for help are *not* sophisticated business professionals. Often the requesting party on
23 UFundUs has no financial training whatsoever.

1 Now and then we will see cases like Taylor Blair's where the person has set up an official
2 nonprofit to help them track repeated donation requests and expenses for a cause, but these individuals
3 rarely have any background and training in running an advanced operation. This is important because
4 it becomes far easier for these individuals to accidentally commit accounting mistakes or manage funds
5 in ways that look suspicious to the police but are totally innocent in nature.

6 You will see this problem over and over again in Ali Caldwell's affidavit. For example,
7 Caldwell notes that none of the Nevada Nice Pet Rescue (NNPR) donations are tax deductible because
8 Blair failed to file for tax-exempt status with the IRS. But that is exactly the type of thing an amateur
9 person is less likely to know they should do. It is not evidence of financial malfeasance. The same
10 assumption is made where Caldwell notes Blair failed to purchase liability or property insurance for
11 staff or organization sites--again, another oversight a non-savvy amateur businessperson may commit
12 by accident.

13 Caldwell lists a number of times where Blair received small-sum donations and later withdrew
14 larger cash amounts from the organization's bank account. On or about February 6, 2023, for instance.
15 Blair takes out a check for \$30,000 from NNPR and deposits it in a personal account. It's unclear to
16 me why this is so suspicious. Again, less business-savvy users may not realize that they can run into
17 trouble by comingling nonprofit or business funds with their personal funds. Just because they share
18 their accounts between their organization and personal lives does not mean they are spending the money
19 on things unrelated to the purpose of the donation.

20 It's ultimately difficult to judge most of the expenditures the State takes issue with in Caldwell's
21 report. For instance, on November 22, 2022, it appears a dinner for only two attendees cost \$440, but
22 it's possible for a person to benefit their nonprofit by hosting a swanky dinner with an influential
23 individual. Business professionals sometimes spend thousands of dollars on dinners with wealthy
24 clients and donors they are trying to swoon. In another example, Taylor Blair appears to spend about

1 \$4,000 on a visit to New York City, but it's unclear for what purpose Blair made this visit or how it
2 may or may not have benefitted NNPR. In a particularly silly example, Caldwell criticizes Blair for
3 spending just \$34,000 on a swimming pool, even though Blair apparently specifically explained it was
4 for rescued dogs.

5 I will end with Caldwell's notation about "amended" numbers. This is not as uncommon as you
6 might imagine, particularly with amateur bookkeepers. It would constitute a rather significant red flag
7 in a company's books with professional, trained staff, but not someone who has little background in
8 accounting. Innocent people can easily make mistakes in their records, and when they notice the
9 mistake the only thing they can really do to stay above board is *fix* the mistake by amending the record.
10 It is certainly possible that Blair amended the records to hide malfeasance, but it isn't scientifically
11 reliable proof of fraud you can determine by reviewing the math of the records.

12 I am familiar with the following Exhibits and Witness Statements:

- 13 • Exhibit 2
- 14 • Exhibit 6
- 15 • Exhibit 7
- Witness Statement of Ali Caldwell

16 I declare under penalty of perjury that everything I have stated in this document is true and correct.

17 Dated: October 1, 2023

/s/ Jordan Carpenter

Witness Statement of Skylar McMahon

My name is Skylar McMahon, I was born on October 9th, 1974, in a small farming town. My dad was a farmer and I grew up working on the farm. We raised cows and grew corn and soybeans. Working on the farm I spent a lot of time behind the wheel, driving the pickup, combine, tractor, semi. You name it, I drove it. I loved driving. As I got older and started looking for outside work, some of the neighboring farms needed a hand hauling their crops so I started earning extra money that way. I didn't really start a business or anything, but hauling crops turned into other opportunities to haul this or that. The money was good, but I kept helping with the farm as well when there was nothing to haul.

Then back in 2013, things changed. A neighbor had sold one of their old combine headers and asked me to deliver it. I delivered it to the nearby farm, but it was pretty late by the time we got it unloaded and I started heading home. It was late, I was tired, and I probably shouldn't have been driving. I was headed down a dirt backroad trying to get some music going to help me stay awake and focus. I looked down at the radio for just a section, and when I looked up there was a black lab running across the road. I slammed on the breaks, but I still had the trailer attached and wasn't able to stop in time. I didn't mean to do it, but I knew I hit that dog. I stopped the truck and got out. The lab looked stunned, and probably had a broken leg, but was otherwise fine. I couldn't just leave him there, so I found the address on his collar, picked him up, and walked him the half mile home. I made sure to cover all the vet bills and did whatever I could to make it right.

I still have tremendous guilt over this incident, but I'm working through that. One of the things that helps my process is to give back time and money to animal-related causes, such as shelters and pet adoption programs.

After I had been working with the first shelter for a couple years they ended up closing down, and I adopted one of the last few pups they had. That started the trend of adopting one dog from each of the organizations I work with. Right now, I have four dogs adopted from various organizations I

1 have worked with. I haven't picked up a dog from Nevada Nice Pet Rescue yet, but I haven't really
2 been looking.

3 At previous shelters where I volunteered, I would often take the dogs for walks and to events
4 where people could see how great the dogs are, while still giving them some exercise. If I remember
5 right, I ran into Taylor Blair at one of those events in early spring of 2021. Taylor introduced himself
6 and told me more about Nevada Nice Pet Rescue. After that, I stopped my volunteer work with the
7 other organizations and just spent all my free time trying to help Taylor make Nevada Nice Pet Rescue
8 the best it could be.

9 Before we launched the website, Taylor would often ask me about this photo or that photo, what
10 I thought would be the best way to get people to care about the dogs. When we had a dog that really
11 needed some emergency help, Taylor and I would reach out to people we knew that wanted to help.
12 We would explain the dog's situation and what was needed to keep the dog going. I found it to be very
13 therapeutic and it was always nice when we managed to help the dog.

14 Every once in a while, there would be a dog that needed some medical care, and I would look
15 at the picture and hear the story and just need to take care of it myself. I still have a nice-sized farm,
16 but I don't have a ton of money, especially after I stopped hauling. What I do have, I try to make good
17 use of. Over 2022 and 2023, I probably paid around \$7,000 a year of my own money to help the dogs
18 through Nevada Nice Pet Rescue. I know that money went to help the dogs and I continue to believe
19 that was money well spent.

20 Taylor started to expand to reach out to more and more donors. I know Taylor was getting
21 frustrated on the smaller donations because we wanted to have a bigger impact. Taylor had been
22 rejected by a few major donors because we didn't look official enough. I guess they were looking for
23 more of a flashy website and pizzazz. There were a few times Taylor brought me along to meet the
24 donors. When it was a regular donor who would consistently give, we might take them out for coffee

1 or donuts at the dog park and just chat about the goals of the organization. Sometimes they would be
2 willing to increase their donations. I think that was money well spent in my opinion. Taylor was great
3 at helping donors see the bang for their buck. Taylor always made sure to send out thank you cards and
4 pictures of the dogs, which generally resulted in more donations.

5 If I remember correctly, it was just about Spring 2021 when Taylor let me and the other
6 volunteers know that we were going to start taking donations through UFundUs. I thought this was
7 great news, so did the other volunteers. I'm not sure how this affected the books; we didn't really touch
8 those. You don't really want volunteers handling the money and finances in a situation like that. A lot
9 of times if you're just a volunteer you don't really understand the finances and why you gotta spend
10 money on different things, and some of our volunteers are really good with dogs, but really bad with
11 numbers.

12 We started planning out our donor meetings a little better, and started to make plans to go to
13 restaurants and bigger events to talk to people about Nevada Nice Pet Rescue and what we were doing.
14 Again, it seemed like it was working, spending a little more money to show the donors that we
15 appreciate their donations made a difference. We were getting more dogs placed and cared for. Once
16 the website went live, I didn't do as much work with the dogs. I loved walking dogs and things like
17 that, but that wasn't where I was needed. I started taking information about dogs, the care that they
18 needed and what type of home was needed passing the information along to Taylor. Some dogs had
19 extreme health conditions and needed surgery, others were in need of adoption, and sometimes we just
20 made sure the dogs had food and medication.

21 Taylor had goals for Nevada Nice Pet Rescue and wanted to build some nice kennels on the
22 farm they lived on to house the animals waiting for adoption. I made it to the farm from time to time.
23 It was a nice farm, there were nice kennels and the dogs all looked super happy. I didn't spend a lot of
24 time with the dogs, but I guess there was probably one or two there each time I went.

1 There was also a pool at the farm; initially there was an above-ground pool that wasn't too nice,
2 and I wouldn't swim in it. I think the new, nicer pool went in around April of 2023. I can see how
3 someone might think it's excessive to let dogs swim in a fancy pool, but it's good for them. After the
4 pool went in I attended a "puppy pool party" or something like that. It gave some of the volunteers a
5 chance to see the place and a reward for all the hard work we had been doing. As for the pool, you
6 can't just have any pool for dogs, they can puncture the sides of some pools really easy, and the dogs
7 need to be able to get in and out. Some of the dogs have wheels, so it's important to have safe access.
8 So I don't think the pool was over the top.

9 I didn't really work on the website either, but I know there was a mix-up from time to time
10 regarding the photos that were posted onto the site. I think one of the volunteers was just kind of lazy
11 when taking down the stories and sending the information over to Taylor. I think he would just get any
12 photo of a dog and send it along to try to make the intake smoother. I admit, I did that once, and felt
13 really bad about it after. There was a dog that needed leg surgery and my heart just went out.
14 Unfortunately, I didn't have the funds myself at the time otherwise I would have covered it myself.
15 The owner wasn't able to get us a good picture of Gus before Taylor needed to get it up on the website
16 and I knew that dogs without pictures just don't get funded. I took this old picture of a dog named
17 Sparky and passed it along to Taylor, and the dog got funded. But I still feel bad about that.

18 I know Taylor, and how much Taylor cares about these dogs, finding them good homes, and
19 taking care of them. The only money Taylor spent was done to help these dogs. We've seen that taking
20 people out to nicer places and looking more "presentable" results in bigger donations and more dogs
21 taken care of.

22 I am familiar with the following Exhibits:

- 23 • Exhibit 8
- 24 • Exhibit 9

1 I declare under penalty of perjury that everything I have stated in this document is true and correct.

2 Dated: October 1, 2023

/s/ Skylar McMahon

EXHIBIT 1 (2 pages)

ALI CALDWELL FORENSIC & FINANCIAL CRIMES ANALYST

SKILLS

Microsoft Office Suite (Word, PowerPoint, Outlook, Excel, Access)
SPSS, Court View, Financial Crimes Platform (FPC)
Operations Image Browser (OIB), Hogan, NEWTON, Lexis Nexis, CLAIMS, DAT, ICMP, CACS, CStar, CCM

EXPERIENCE

10/2021 to Current

Senior Financial Crimes Analyst, Rhyolite County Fraud & Cybercrimes Unit, Silverton, Nevada

- Responsible for investigative research, root cause analysis and consulting regarding highly complex financial crimes transactions, policy violations and/or suspicious situations with low, moderate, and high risk.
- Conduct investigative research using appropriate investigative techniques to determine risk.
- Perform detailed analyses to detect patterns, trends, anomalies and schemes in transactions and relationships across multiple businesses/products.
- Review and analyze investigative findings and make recommendations based upon outcomes.
- Draft corrective action plans and assist in managing change to prevent/mitigate risk. Perform risk analysis and modeling as a precursor to building financial crimes strategies.
- Perform detailed analyses, maintain required documentation, and file Suspicious Activity Reports (SARs).

05/2021 to 10/2021

Financial Crimes Consultant 1 – Contractor, Forensic Labs, Inc., Las Vegas, NV

- Perform functions as instructed by the Head of Investigative Planning and Operations and Investigations Coordinator.
- Oversee and conduct forensic analyses of financial, computer, digital documents.
- Identify assets of suspects in order to freeze and seize such assets with a view to forfeiture.
- Interview suspects, witnesses, victims, and experts as required.
- Investigate reported incidents and deliver facts and assistance to law enforcement.
- Establish and maintain strong working relationships with appropriate industry groups and governmental agencies.

05/2019 to 08/2020

Internship, Washoe County Judicial Center, Reno, NV

- Worked with the Assignment Office – responsible for mailing out notices, organizing Judge's orders, and answering phones.
- Located and retrieved files for Court Mediator, Magistrate and Judges when needed.
- Observed court hearings, trials, and mediations. Created jury pamphlets for the Judges' use.

EDUCATION AND TRAINING

- Bachelor of Science: Criminal Justice, University of Nevada, 2019
- Professional Science Master's Degree, Forensic Science, with concentrations in fraud management or economic crime, Arizona State University, Tempe, Arizona, 2020
- Certified Forensic Analyst, University of Nevada, Las Vegas, with special training in government accounting, 2021
- Computer Forensics Certificate, Northeastern Illinois University, Chicago, Illinois

OTHER CERTIFICATIONS

- International Compliance Association Certificates
 - Certificate in Financial Crime Prevention
 - Certificate in Anti Money Laundering
 - Specialist Certificate in Anti-Corruption

PUBLICATIONS

- “Electronic Crime Scene Investigation: A Guide for Investigation Teams,” Crime Scene Investigators Monthly Journal, October 2021.
- “Crime Scene Units: A Look into the Future,” American Institute of Justice, May 2022.
- “Don’t Forget those Standards! Reflections on the AAFS Standards for Crime Scene Investigations,” AAFC Journal, June 2022.
- “Mobile Device Forensics: Beyond Texting,” American Institute of Justice, May 2023.

ACTIVITIES AND HONORS

- Association of Certified Fraud Examiners, Member
- American Academy of Forensic Sciences
 - Member, Forensic Document Examination Consensus Body
- American Correctional Association, Member
 - Participated in member debates
 - Organized professional speakers and internal events. Toured prisons
 - Networked with members and local professionals

EXHIBIT 2

Ali Caldwell Investigation Notes: NV Nice Revenues & Expenses July 1, 2022 – June 30, 2023	
L: Appears Legitimate	
Q: Questionable/Unable to verify - no documentation, explanation unsubstantiated	
	NOTES
Donations	Q: Jan 2023: alleged Victim's donation of \$25,000 included in Jan. March: another very large donation of \$30,000 - alleged victim unwilling to be interviewed.
Grants	L: \$10,000 from Friends of Furry Friends; \$15,000 from DoggyDelishCo
Other Income	L: T-shirt sales
In-kind Donations	L: People donating blankets, food, toys for dogs
EXPENSES	NOTES
Salaries & wages	L: Jan - Jun - suspect cited increased work, more hours
Insurance, benefits, fringe	L
Bank, PayPal & Credit Card Fees	L: UFundUs fees for credit card transactions; monthly bank fees
Communications	L
Consultants (veterinarian)	L
Equipment (over \$5,000)	L/Q: Aug, kennel upgrades; Feb, cash payment, recipient/vendor not identified; "dog pool"; looks suspicious.
Insurance	Q: no property or liability insurance
Marketing/Website & Social Media	L
Meals & Entertainment	L/Q: general lack of receipts; March-May alleged for Board, volunteer, and donor meetings, can't verify meetings, who is on Board of Directors
Mileage & Local Travel	Q: Feb-Jun, no mileage log or other documentation produced
Office Supplies & Software	L: laptop, accessories; monthly software subscription fees
Postage & Delivery	L
Printing & Reproduction	L: brochures, misc. printing
Professional Development & Conferences	L: Aug, Oct - organization purpose verified; Q: Westminster Kennel Club show - organization purpose not substantiated (no workshop attendance, etc.). April Prof. Dev. not verified
Project Supplies	L/QL monthly delivery from PetWise; bags of food, accessories piled up in storage
Property Costs	L: property use fees; utilities.
Travel	Q: hotel (2173.50), meals (1243.74), Other (400) very high (over federal rate), organization purpose unsubstantiated (no documentation of workshop attendance or other) - attendance at Westminster Kennel show, New York. Purposes of travel expense for April not verified.
Volunteer Recruitment/Retention	L/Q: volunteer appreciation dinner, Dec 21, 2022. 2 people in attendance, \$440

EXHIBIT 3

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EXHIBIT 4 (2 pages)



Thelma C. Ryan
Secretary of State
 202 North Carson Street Carson
 City, Nevada 89701-4201 (775)
 684-5708
 Website: www.nvsos.gov
www.nvsilverflume.gov

Filed in the Office of	Business Number
Thelma C.	E867-5309
Ryan	Filing Number
Secretary of State	20218675309
State Of Nevada	Filed On
	02/2/2021 11:09:56 AM
	Number of Pages
	4

Formation - Nonprofit Corporation

- ☒ NRS 82 - Articles of Incorporation Nonprofit ☐ NRS 81.010 - Formation of Nonprofit Cooperative Corporation With or Without Stock ☐ NRS 81.170-81.270 - Articles of Cooperative Association
- ☐ NRS 80 - Foreign Nonprofit Corporation ☐ NRS 81.410 - Articles of Incorporation Nonprofit Cooperative Corporation Without Stock

TYPE OR PRINT - USE DARK INK ONLY - DO NOT HIGHLIGHT

1. Name of Entity: (If foreign, name in home jurisdiction)	Nevada Nice Pet Rescue, Inc.
2. Registered Agent for Service of Process: (Check only one box)	<input type="checkbox"/> Commercial Registered Agent (name only below) <input type="checkbox"/> Noncommercial Registered Agent (name and address below) <input checked="" type="checkbox"/> Office or position with Entity (title and address below) President Name of Registered Agent OR Title of Office or Position with Entity 1267 Tony St. Oromina Nevada 89481 Street Address City Zip Code Mailing Address (If different from street address) City Zip Code
2a. Certificate of Acceptance of Appointment of Registered Agent:	I hereby accept appointment as Registered Agent for the above named Entity. If the registered agent is unable to sign the Articles of Incorporation, submit a separate signed Registered Agent Acceptance form. X Taylor Blair, President 02/2/2021 Authorized Signature of Registered Agent or On Behalf of Registered Agent Entity Date
3. Names and Addresses of the Board of Directors, Member, or Trustees (NRS 81.410 must not be less than three members, see instructions)	1) Taylor Blair Name 1267 Tony St. Oromina NV 89481 Address City State Zip Code 2) Name Address City State Zip Code 3) Name Address City State Zip Code 4) Name Address City State Zip Code 5) Jody Lykes Name Address City State Zip Code
4. Jurisdiction of Incorporation: (NRS 80 only)	4a. Jurisdiction of incorporation: 4b. I declare this entity is in good standing in the jurisdiction of its incorporation. <input type="checkbox"/>
5. Authorized Shares: (Number of shares corporation is authorized to issue, NRS 80 and NRS 81.010)	Number of common shares with Par value: 0 Par value: \$ 0 Number of preferred shares with Par value: 0 Par value: \$ 0 Number of shares with no par value: 0 If a Nonprofit Entity: <input type="checkbox"/> This is a nonprofit entity with authorized stock, as listed above. <input type="checkbox"/> This entity is a nonprofit, non-stock corporation.

This form must be accompanied by appropriate fees.

page 1 of 2



Thelma C. Ryan
Secretary of State
202 North Carson Street Carson
City, Nevada 89701-4201 (775)
684-5708
Website: www.nvsos.gov
www.nvsilverflume.gov

Formation - Non-profit Corporation

Continued, Page 2

6. Benefit Corporation: (For NRS 81.010, optional. see instructions.)	By selecting "Yes" you are indicating that the corporation is organized as a benefit corporation pursuant to NRS Chapter 78B with a purpose of creating a general or specific public benefit. The purpose for which the benefit corporation is created must be disclosed in the below purpose field.		Yes <input type="checkbox"/>																
7. Purpose: (Required for NRS 80, NRS 81.010, NRS 81.170-81.270, 81.410, and any entity selecting Benefit Corporation. See instructions.)	Any purpose for which an organization may be exempt under Section 501(c)(3) of the Internal Revenue Code. Without limiting the foregoing, the primary purpose of this organization is to operate one or more FCC-licensed Low Power FM (LPFM) or FM noncommercial educational broadcast stations for educational and charitable purposes including literary, scientific and artistic advancement, lessening community and neighborhood tensions, eliminating prejudice and discrimination, and defending human and civil rights secured by law.																		
8. Member Property Rights: (NRS 81.010 see instructions)	The property rights and interest of each member are: <input type="checkbox"/> Equal OR <input type="checkbox"/> Unequal																		
9. Member Property Rights: (NRS 81.410 see instructions)	The voting power and the property rights and interest of each member are: <input type="checkbox"/> Equal OR <input type="checkbox"/> Unequal																		
10. Term: (NRS 81.010, 81.170-81.270, 81.410 may be perpetual)	The term of existence: (if existence is not perpetual)	<input type="text"/>	11. Equal Interest Rights: (NRS 81.170-81.270) The interest and right of each member therein is to be equal.																
12. Membership Fee: (NRS 81.170-81.270, must be completed)	The membership fee is \$ <input type="text"/> per member. Each member signing the articles has paid the fee and their interests and rights are equal.																		
13. Name, Address and Signature of: NRS 80 Name, title and signature making the statement. NRS 81.010 Name, address and signature of three or more of the original members, a majority of whom must be residents of this state. NRS 81.410 and 82 Name, address and signature of the Incorporator(s). NRS 81.170 Must be signed by the original associates or members.	<p>I declare, to the best of my knowledge under penalty of perjury, that the information contained herein is correct and acknowledge that pursuant to NRS 239.330, it is a category C felony to knowingly offer any false or forged instrument for filing in the Office of the Secretary of State.</p> <table border="0"><tr><td colspan="2"><input type="text" value="Taylor Blair"/></td><td colspan="2"><input type="text" value="United States"/></td></tr><tr><td colspan="2">Name</td><td colspan="2">Country</td></tr><tr><td><input type="text" value="1267 Tony St."/></td><td><input type="text" value="Oromina"/></td><td><input type="text" value="NV"/></td><td><input type="text" value="89481"/></td></tr><tr><td>Address</td><td>City</td><td>State</td><td>Zip/Postal Code</td></tr></table> <p>X <u>Taylor Blair</u> (attach additional page if necessary)</p>			<input type="text" value="Taylor Blair"/>		<input type="text" value="United States"/>		Name		Country		<input type="text" value="1267 Tony St."/>	<input type="text" value="Oromina"/>	<input type="text" value="NV"/>	<input type="text" value="89481"/>	Address	City	State	Zip/Postal Code
<input type="text" value="Taylor Blair"/>		<input type="text" value="United States"/>																	
Name		Country																	
<input type="text" value="1267 Tony St."/>	<input type="text" value="Oromina"/>	<input type="text" value="NV"/>	<input type="text" value="89481"/>																
Address	City	State	Zip/Postal Code																

AN INITIAL LIST OF OFFICERS MUST ACCOMPANY THIS FILING

Please include any required or optional information in space below:

(attach additional page(s) if necessary)

This form must be accompanied by appropriate fees.

page 2 of 2

EXHIBIT 5 (2 pages)

Wet Willy's Pool Services, Inc.

RESIDENTIAL REMODELING/CONSTRUCTION CONTRACT

Expected Start Date: April 10, 2023

YOUR NAME: TAYLOR BLAIR

YOUR MAILING ADDRESS: 1267 Tony Street
Oromina, NV 89481

JOB LOCATION, if different than your mailing address: N/A

YOU AND WET WILLY'S POOL SERVICES, INC. (BUILDER) AGREE AS FOLLOWS:

1. Builder agrees to perform the following work (attach dated plans and dated specifications, if any, to this Contract):

DEMOLISH EXISTING POOL STRUCTURE; BUILD NEW 24 FOOT DIAMETER x FOUR FOOT
HEIGHT POOL, COMPOSITE DECKING, STAIRS, RAILING, FREESTANDING CABANA WITH
ADULT BAR AS DISCUSSED W/ T. BLAIR.

INSTALL WATER PUMP, FILTRATION SYSTEM.

2. You agree to pay Builder \$ 34,250.00 for this work as follows:

DIRECT BILLED TO NV NICE PET RESCUE

The price for the work includes all labor, materials, building permits, and temporary power, You may not occupy or use any of the work done by the Builder until the Builder has been paid in full. All work is considered completed on the date a Certificate of Occupancy is issued. If you live in an area where a Certificate of Occupancy will not be issued, the Builder will determine when the work is complete.

3. The Builder agrees to start work on or before APRIL 10, 2023, and all work will be completed within 10 days. You agree that the Builder is not responsible for delays in completion of the

work due to weather, strikes, war, shortage, or delay in getting materials, shortage or delay in labor or subcontracting, any other problem with suppliers or subcontractors, government regulations, court actions or any other cause beyond the Builder's control.

You agree to pay for unexpected or unanticipated extra costs such as soil corrections, protection of the project from weather conditions and all other similar costs.

4. If you fail to pay the Builder any payments due under the terms of this Contract, the Builder may stop work without further notice. You will be liable to Builder for all payments and Builder costs due up to the time work is stopped, and for all losses sustained by the Builder on materials, machinery, equipment, or tools, overhead, profit, soft costs, and damages. The Builder will only restart work after you have paid all money due the Builder and the Builder is satisfied that you have the ability to pay for the remaining work.

If work has stopped for any reason, Builder may terminate this Contract and recover from you, payment for all work completed, and for all losses sustained by the Builder on all materials, machinery, equipment, or tools, overhead, soft costs, profit, and damages.

T.B. I (WE) AGREE
(All Buyers must initial)

5. This is a legal and binding contract. You represent to the Builder that all the information in this Contract is correct, and that you have read and understand this Contract.

T.B. I (WE) AGREE
(All Buyers must initial)

THIS IS A LEGALLY BINDING DOCUMENT. READ IT CAREFULLY AND UNDERSTAND IT BEFORE YOU SIGN IT. CONSULT YOUR ATTORNEY IF YOU HAVE ANY QUESTIONS.

Taylor Blair
(Buyer)

William S. Boyd
(Builder)
Builder License No. 676492

EXHIBIT 6

NV NICE PET RESCUE BALANCE SHEET

7/1/21 - 6/30/22 7/1/22 - 6/30/23



ASSET TYPE	PRIOR YEAR	CURRENT YEAR
Current assets	14,708	42,373
Fixed assets (Shed, kennel, truck (?))	4,000	35,500
Other assets (dog supplies)	0	800
Current liabilities (bills)	600	1,450
Long-term liabilities	0	2,500
TOTAL ASSETS	18,708	78,673
TOTAL LIABILITIES	 600	 3,950
BALANCE	18,108	74,723

EXHIBIT 7

NV NICE PET RESCUE

FINANCIAL REPORT 7/1/22 - 6/30/23

Revenue	Description	Jul.	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	Jun	Total
	Donations	\$3,000.00	\$4,000.00	\$4,000.00	\$5,000.00	\$8,000.00	\$15,000.00	\$32,000.00	\$6,650.00	\$35,000.00	\$9,500.00	\$12,000.00	\$15,000.00	\$149,150.00
	Grants	\$10,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$25,000.00
	Online Sales	\$75.00	\$75.00	\$50.00	\$100.00	\$100.00	\$300.00	\$50.00	\$100.00	\$100.00	\$125.00	\$100.00	\$50.00	\$1,225.00
	In-Kind Donations	\$575.00	\$200.00	\$67.00	\$125.00	\$300.00	\$789.00	\$112.00	\$85.00	\$24.00	\$67.00	\$48.00	\$19.00	\$2,411.00
													Total	\$177,786.00
Expenses														
	Salaries & Wages	\$500.00	\$500.00	\$500.00	\$500.00	\$500.00	\$500.00	\$2,000.00	\$2,000.00	\$2,000.00	\$2,000.00	\$2,000.00	\$2,000.00	\$15,000.00
	Insurance, benefits, fringe	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$3,600.00
	Bank, UFundUs & Credit Card Fees	\$312.00	\$312.00	\$311.00	\$313.00	\$313.00	\$349.00	\$312.00	\$313.00	\$313.00	\$314.00	\$313.00	\$312.00	\$3,787.00
	Consultants (e.g., veterinarian)	\$600.00	\$0.00	\$0.00	\$0.00	\$300.00	\$0.00	\$0.00	\$0.00	\$300.00	\$0.00	\$0.00	\$300.00	\$1,500.00
	Communications (phone, internet)	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$55.00	\$55.00	\$55.00	\$55.00	\$55.00	\$590.00
	Equipment (over \$5,000)	\$0.00	\$6,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$30,000.00		\$34,250.00			\$70,250.00
	Insurance, benefits, fringe													\$0.00
	Marketing/website/social media	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$45.00	\$540.00
	Meals & Entertainment	\$24.00	\$13.00	\$19.00	\$36.00	\$12.00	\$36.00	\$125.00	\$87.00	\$380.00	\$240.00	\$158.00	\$97.00	\$1,227.00
	Mileage & Local Travel	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$325.00	\$325.00	\$325.00	\$325.00	\$325.00	\$325.00	\$3,150.00
	Office Supplies & Software	\$20,174.00	\$145.00	\$145.00	\$145.00	\$145.00	\$145.00	\$145.00	\$145.00	\$145.00	\$4,145.00	\$145.00	\$145.00	\$25,769.00
	Postage & Delivery	\$20.00	\$20.00	\$60.00	\$85.00	\$40.00	\$45.00	\$40.00	\$27.00	\$27.00	\$19.00	\$20.00	\$20.00	\$423.00
	Printing & Reproduction	\$0.00	\$0.00	\$995.00	\$0.00	\$0.00	\$2,571.00	\$0.00	\$0.00	\$25.00	\$0.00	\$100.00	\$0.00	\$3,691.00
	Project Supplies	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$2,400.00
	Prof. Development & Conferences	\$0.00	\$50.00	\$0.00	\$50.00	\$0.00	\$0.00	\$0.00	\$300.00	\$0.00	\$2,000.00	\$0.00	\$0.00	\$2,400.00
	Property Costs	\$750.00	\$750.00	\$750.00	\$850.00	\$850.00	\$850.00	\$850.00	\$1,350.00	\$1,350.00	\$1,750.00	\$1,350.00	\$1,350.00	\$12,800.00
	Travel	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,500.00	\$5,517.00	\$0.00	\$9,017.00
	Volunteers Recruitment/Retention	\$100.00	\$0.00	\$0.00	\$0.00	\$0.00	\$440.00	\$0.00	\$0.00	\$2,100.00	\$0.00	\$0.00	\$0.00	\$2,640.00
Total Expense		\$5,013.00	\$8,480.00	\$3,470.00	\$2,669.00	\$2,850.00	\$5,626.00	\$4,362.00	\$35,247.00	\$7,665.00	\$49,243.00	\$10,268.00	\$5,249.00	\$140,502.00
Net Revenue		\$8,062.00	(\$4,405)	\$580.00	\$2,431.00	\$5,250.00	\$9,674.00	\$42,688.00	(\$28,497)	\$27,435.00	-\$9,618.00	1,472	\$9,801.00	\$34,873.00
Cash in Bank 6/30/22		\$7,208												
Cash in Bank 6/30/23		\$4,873												

EXHIBIT 8

Nevada Nice Pet Rescue – Pool Pictures



NNPR Pool - April 2022



**NNPR Pool – April
2023**

EXHIBIT 9



EXHIBIT 10

