UTAH LAW RELATED EDUCATION

Presents the

2026 Utah High School and Junior High School Mock Trial Competition Case

State v. Howell

Case No. 251110980

Based on: Minnesota State Bar Association 2021-2022 Mock Trial Case
State of Minnesota v. Taylor Blair

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2026 Utah High School and Junior High School Mock Trial Case

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Case Summary

(For informational purposes only; not to be used or referred to during trial)

> *Stacy is a bright-eyed, charming, funny 8-year-old who dreams of becoming an astronaut. Stacy's mother goes on a crowdfunding site to raise money to pay for Stacy's bone cancer treatment. Without such treatment, her mother states, Stacy will die.*
>
> *Tommy, a miner from West Virginia, was injured in a mining accident. He is unable to work and is in danger of losing his home. Tommy, his wife, and 3 children, aged 2, 4 and 7, are facing homelessness. Tommy and his wife had to pull the kids out of school and don't have enough income for other basic necessities.*

Both of these stories were placed on a popular crowdfunding website and each raised tens of thousands of dollars. The problem? Neither story is true. They are both 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, bank accounts, and credit cards.

Crowdfunding is a popular way for people to raise significant amounts of money from lots of small donations from donors who want to help. While a popular crowdfunding platform reports that less than .1% of sites the platform hosts have been fraudulent, crowdfunding raises over $50 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 until the creator (the person asking for assistance) gets greedy.

Communications fraud, charitable fraud, and similar schemes are a particular problem in Utah, because of the State's trusting and caring population, the possibility that fraudsters may attempt to use religion to manipulate their targets, and because Utah's relatively low crime rate may create a false sense of security. [1]

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 having been neglected or abandoned. The defendant in the case, Stevie Howell, raised funds through Defendant's website—Rescue Utah's Furry Friends (RUFF)—and through Neighbors Crowdfunding Neighbors ("NCN"), a fictional crowdfunding site. Howell also personally solicited donations. The issues confronting the parties are whether or not Howell's solicitations were genuine and whether Howell engaged in communications fraud, or the unlawful use of technology to defraud.

The witnesses for the prosecution are:

- WHISTLEBLOWER: ***Sloane Sanderson****, co-founded RUFF with Defendant Howell.*
- FINANCIAL CRIMES ANALYST: ***Quinn Prescott*** *is a peace officer employed by Lake County.*
- VICTIM: ***Robin McCallister*** *is a donor to RUFF who has accused Defendant of misleading donors regarding use of the funds being donated.*

The witnesses for the defense are:

- DEFENDANT: ***Stevie Howell*** *is the Defendant in this case, and who (with Sloane Sanderson), co-founded RUFF.*
- FORENSIC ACCOUNTANT: ***Adrian Donahue*** *is a former employee of NCN, and now is an expert witness on behalf of new business owners like Defendant Howell.*
- CONTRACTOR: ***Jesse Graves*** *was contracted by Defendant Howell concerning a new pool built for the dogs to exercise.*

Enjoy!
Case Editors & Utah Law Related Education

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[1] *See* Ciara Hulet, "Utah is already a popular target for scams, leaving older Utahns uniquely vulnerable," kuer.org, https://www.kuer.org/business-economy/2023-08-01/utah-is-already-a-popular-target-for-scams-leaving-older-utahns-uniquely-vulnerable (Aug. 1, 2023); "7 reasons Utah residents could be the biggest suckers for fraud," ksl.com, https://www.ksl.com/article/50517477/7-reasons-utah-residents-could-be-the-nations-biggest-suckers-for-fraud (Nov. 20, 2022)

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IN THE THIRD DISTRICT COURT
STATE OF UTAH

STATE OF UTAH, **Plaintiff,** **v.** **STEVIE HOWELL** 1298 Ranch Road Payson, UT 84651 DOB: 3/11/1990, **Defendant.**	**Screened by: Axel O. Awesome:** **Assigned to: TBA** **INFORMATION** Case No. 251110980 Judge A.B. Reinhold SUMMONS: TO BE ISSUED WARRANT/RELEASE: ORP

The Undersigned Officer, Quinn Prescott–Lake County Sheriff's Office, Agency Case TS 25-020, upon a written declaration states on information and belief that the defendant, STEVIE HOWELL, DOB 3/11/1990, committed the following offense(s):

COUNT I

Charge: Communications Fraud – Second Degree Felony
Utah Code § 76-6-525(2), 3(d), in that on or between July 1, 2023 and June 30, 2024, in Lake County, State of Utah, the Defendant STEVIE HOWELL, did devise a scheme or artifice to defraud another or to obtain from another money, property or anything of value; by means of false or fraudulent pretenses, representations, promises, or material omissions; and communicated directly or indirectly with any person by any means, for the purpose of executing or concealing the scheme or artifice; and the total value of the property, money, or thing to be obtained or sought to be obtained exceeded $5,000, specifically that Defendant made multiple communications in person and through the use of the mail, telephone, computer, or spoken and written communication to convince victims that Defendant was raising money to support or treat dogs, when in fact Defendant used the money for personal gain.

COUNT II

Charge: Communications Fraud – Class A Misdemeanor
Utah Code § 76-6-525(2), 3(b), in that on about December 29, 2023, in Lake County, State of Utah, the Defendant STEVIE HOWELL, did devise a scheme or artifice to defraud another or to obtain from another money, property or anything of value; by means of false or fraudulent pretenses, representations, promises, or material omissions; and communicated directly or indirectly with any person by any means or the repurpose of executing or concealing the scheme or artifice; and the total value of the property, money, or thing to be obtained or sought to be obtained exceeded $500 but was less than $5,000 specifically that on December 29, 2023, Defendant directly solicited Robin McAllister, for funds that were asserted by Defendant to be used for a networking trip to further the mission of supporting or treating dogs, but was intended, and actually became, a pleasure trip for Defendant.

COUNT III

Charge: Unlawful Use of Technology to Defraud – Second Degree Felony
Utah Code § 76-6-703.3(2), 3(d)(i) in that on or between July 1, 2023 and June 30 2024, in Lake County, State of Utah, the Defendant STEVIE HOWELL did use, or knowingly allowed another person to use a computer network, computer property, or computer system, program, or software to device or execute an artifice or scheme to defraud or obtain money, property, a service, or other thing of value by false pretense, promise, or representation, namely that the Defendant used computer websites, including the Rescuing Utah's Furry

Friends and Neighbors Crowdfunding Neighbors websites, to solicit and receive funds for the support or treatment of dogs, when the funds were actually used for Defendant's personal gain.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

1. I, Quinn Prescott, am a POST-certified peace officer employed by the Lake County Sheriff's Office. The information herein is based on my personal knowledge and information I gathered while talking with victims and other witnesses, including Sloane Sanderson, Robin McAllister, and other law enforcement officers from the Lake County Sheriff's Office.
2. Based on my investigation as to circumstances surrounding this matter, there is probable cause to believe that Defendant STEVIE HOWELL (DOB 3/11/1990) engaged in the offenses charged above.
3. Defendant created an organization, Rescuing Utah's Furry Friends ("RUFF"), that purported to lend support, boarding, medical care, and other assistance to dogs without permanent homes. In fact, the organization did not help dogs at all. The funds raised were used for Defendant's own personal financial enrichment and gain.
4. This scheme commenced on or about July 1, 2023 and continued through June 30, 2024. Defendant solicited donations through written and in-person oral communications, and through electronic mail, through communications on the computer websites for RUFF and Neighbors Crowdfunding Neighbors ("NCN"), and other communications sent by Defendant or in which Defendant knowingly allowed others to send.
5. As specifically relevant to Count II, on December 29 2023, the Defendant communicated with Robin McAllister, asking McAllister for $4,000 to partially fund a trip to New York City so that Defendant could network and solicit funds from companies that provided services to and for dogs. At the time, the Defendant did not have a present intent to use the funds as described, but rather to use the funds for personal purposes and financial enrichment. And in fact, Defendant used the funds for luxurious hotel stays, dinners, and personal recreational and entertainment activities.
6. The donations received from the solicitations in person, through written and oral communications, and through the computer websites were used to, among other things, purchase a GM G-150 Thunder vehicle, valued at approximately $99,000, and a swimming pool, valued at $123,500, which were not used for the care or support of animals.
7. At the time Defendant made these communications, Defendant knew that the funds would not be used for the support, boarding, medical care, or other

assistance to dogs, but would be used for Defendant's own personal financial enrichment and gain.

Therefore, Complainant requests that Defendant, subject to bail or conditions of release, be:

(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or

(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

/s/ 

Quinn Prescott

Being authorized to prosecute the offenses charged, I approve this complaint.

Date: November 23, 2025

PROSECUTING ATTORNEY'S SIGNATURE:

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IN THE THIRD DISTRICT COURT
STATE OF UTAH

STATE OF UTAH, **Plaintiff,** **v.** **STEVIE HOWELL** 1298 Ranch Road Payson, UT 84651 DOB: 3/11/1990, **Defendant.**	**RELEVANT LAW** Case No. 251110980 Judge A.B. Reinhold

The parties, through counsel, stipulate that the following statutes and case law, may be referenced in arguments during trial in this matter, in addition to the Stipulated Jury Instructions, Simplified Rules of Evidence, and the Rules of the Competition. No other law or statute may be relied upon.

Utah Code § 76-2-101. Requirements of criminal conduct and criminal responsibility.

(1)

(a) A person is not guilty of an offense unless the person's conduct is prohibited by law; and

(b)

(i) the person acts intentionally, knowingly, recklessly, with criminal negligence, or with a mental state otherwise specified in the statute defining the offense, as the definition of the offense requires….

Utah Code 76-2-103 Definitions.

A person engages in conduct:

(1) Intentionally, or with intent or willfully with respect to the nature of his conduct or to a result of his conduct, when it is his conscious objective or desire to engage in the conduct or cause the result.

(2) Knowingly, or with knowledge, with respect to his conduct or to circumstances surrounding his conduct when he is aware of the nature of his conduct or the existing circumstances. A person acts knowingly, or with knowledge, with respect to a result of his conduct when he is aware that his conduct is reasonably certain to cause the result.

(3) Recklessly with respect to circumstances surrounding his conduct or the result of his conduct when he is aware of but consciously disregards a substantial and unjustifiable risk that the circumstances exist or the result will occur. The risk must be of such a nature and degree that its disregard constitutes a gross deviation from the standard of care that an ordinary person would exercise under all the circumstances as viewed from the actor's standpoint.

…

Utah Code § 76-1-101.5. Definitions.

Unless otherwise provided, as used in this title:

(1) "Act" means a voluntary bodily movement and includes speech.

(2) "Actor" means a person whose criminal responsibility is in issue in a criminal action.

…

(5) "Conduct" means an act or omission.

…

(9) "Offense" means a violation of any penal statute of this state.

(10) "Omission" means a failure to act when there is a legal duty to act and the actor is capable of acting.

(11) "Person" means an individual, public or private corporation, government, partnership, or unincorporated association

…

(19) "Writing" or "written" includes any handwriting, typewriting, printing, electronic storage or transmission, or any other method of recording information or fixing information in a form capable of being preserved.

76-6-702. Definitions.

As used in this part:

(1) "Access" means to directly or indirectly use, attempt to use, instruct, communicate with, cause input to, cause output from, or otherwise make use of any resources of a computer, computer system, computer network, or any means of communication with any of them.

(2) "Authorization" means having the express or implied consent or permission of the owner, or of the person authorized by the owner to give consent or permission to access a computer, computer system, or computer network in a manner not exceeding the consent or permission.

(3) "Computer" means any electronic device or communication facility that stores, processes, transmits, or facilitates the transmission of data.

(4) "Computer network" means:

(a) the interconnection of communication or telecommunication lines between:

(i) computers; or

(ii) computers and remote terminals; or

(b) the interconnection by wireless technology between:

(i) computers; or

(ii) computers and remote terminals.

(5) "Computer property" includes electronic impulses, electronically produced data, information, financial instruments, software, or programs, in either machine or human readable form, any other tangible or intangible item relating to a computer, computer system, computer network, and copies of any of them.

(6) "Computer system" means a set of related, connected or unconnected, devices, software, or other related computer equipment.

…

(19) "Software" or "program" means a series of instructions or statements in a form acceptable to a computer, relating to the operations of the computer, or permitting the functioning of a computer system in a manner designed to provide results including system control programs, application programs, or copies of any of them.

Utah Code § 76-6-525 Communications Fraud

(1)

….

(b) Terms defined in Section 76-1-101.5 apply to this section.

(2) An actor commits communications fraud if the actor has devised any scheme or artifice to defraud another or to obtain from another money, property, or other thing of value by means of false or fraudulent pretenses, representations, promises, or material omissions, and who communicates directly or indirectly with any person by any means for the purpose of executing or concealing the scheme or artifice.

(3) A violation of Subsection (2) is:

(a) a class B misdemeanor when the value of the property, money, or thing obtained or sought to be obtained is less than $500;

(b) a class A misdemeanor when the value of the property, money, or thing obtained or sought to be obtained is or exceeds $500 but is less than $1,500;

(c) a third degree felony when the value of the property, money, or thing obtained or sought to be obtained is or exceeds $1,500 but is less than $5,000;

(d) a second degree felony when the value of the property, money, or thing obtained or sought to be obtained is or exceeds $5,000….

(4) The determination of the degree of an offense under Subsection (2) is measured by the total value of all property, money, or things obtained or sought to be obtained by the scheme or artifice described in Subsection (2) …..

(5)

(a) Reliance on the part of any person is not a necessary element of the offense described in Subsection (2).

(b) An intent on the part of the actor of any offense described in Subsection (2) to permanently deprive any person of property, money, or thing of value is not a necessary element of the offense.

(c) Each separate communication made for the purpose of executing or concealing a scheme or artifice described in Subsection (2) is a separate act and offense of communication fraud.

(6)

(a) To communicate as described in Subsection (2) means to:

(i) bestow, convey, make known, recount, or impart;

(ii) give by way of information;

(iii) talk over; or

(iv) transmit information.

(b) Means of communication include use of the mail, telephone, telegraph, radio, television, newspaper, computer, and spoken and written communication.

(7) An actor may not be convicted under this section unless the pretenses, representations, promises, or material omissions made or omitted were made or omitted intentionally, knowingly, or with a reckless disregard for the truth.

Utah Code § 76-6-703.3 Unlawful Use of Technology to Defraud

(1)

…

(b) Terms defined in Sections 76-1-101.5 and 76-6-702 apply to this section.

(2) An actor commits unlawful use of technology to defraud if the actor uses or knowingly allows another person to use a computer, computer network, computer property, or computer system, program, or software to devise or execute any artifice or scheme to defraud or to obtain money, property, a service, or other thing of value by a false pretense, promise, or representation.

(3) A violation of Subsection (2) is:

(a) a class B misdemeanor if the value of the money, property, service, or thing obtained or sought to be obtained is less than $500;

(b) a class A misdemeanor if the value of the money, property, service, or thing obtained or sought to be obtained is or exceeds $500 but is less than $1,500;

(c) a third degree felony if the value of the money, property, service, or thing obtained or sought to be obtained is or exceeds $1,500 but is less than $5,000; or

(d) a second degree felony if:

(i) the value of the money, property, service, or thing obtained or sought to be obtained is or exceeds $5,000; …

(4)

…

(b) This section does not affect, limit, or apply to any activity or conduct that is protected by the constitution or laws of this state, or by the constitution or laws of the United States.

…

Case Law[1]

State v. Norris,[2] 2007 UT 6, ¶ 19, 152 P.3d 293, 297 (Communications fraud statute is constitutional under a First Amendment challenge because the statute criminalizes speech that is "both knowingly false and part of a scheme to defraud …. However, speech that is knowingly false but that is neither defamatory, fraudulent, nor otherwise harmful to the interests of society may well be protected by the Constitution from state prohibitions" and not covered by the communications fraud statute).

State v. Tebbs, 786 P.2d 775, 779 (Utah Ct. App. 1990) (The prosecution has the burden of proof on every element of communications fraud offense, including to prove that the "pretenses, representations, promises, or material omissions made or omitted were made or omitted intentionally, knowingly, or with a reckless disregard for the truth").

State v. Kent, 945 P.2d 145, 148 (Utah Ct. App. 1997) ("With respect to computer crimes, the Legislature clearly made a determination that because computer crimes are difficult to police and have a greater potential for ruinous consequences, the use of a computer to commit a crime to defraud should be punished more severely than other offenses involving fraud; namely, the offenses of forgery, insurance fraud, and communications fraud. [C]omputer crimes involve the type of fraud that is easy to commit and difficult to detect.").

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[2] Some of these cases are actual decisions; others are based on real cases dealing with fraud or communications fraud but may have been altered from their original disputes for purposes of this mock trial case.

[1] A case citation has three main parts. The first lists the names of the parties. The second lists the volume, reporter, first page of the case, and, if a specific reference is being noted, the page on which the specific reference, called a "pincite," is located. The third lists the court (unless it's obvious) and the year the decision was issued. If only a state is listed, then the case comes from the state's highest court. Cases are published in "reporters." These are a series of books that publish written judicial opinions from select courts. U.S. Supreme Court cases are published in (among others) the U.S. Reports, which is abbreviated "U.S." Cases from Utah state courts are published in the Pacific Reporter, which is abbreviated "P." The Pacific Reporter has multiple "series" – Second and Third– because the publisher of the reporters have decided that they don't want more than 999 volumes in each reporter. So decisions reported in the second series are abbreviated "P.2d," and from the third "P.3d."

In 1999, Utah adopted a "public domain" citation format, so that people aren't reliant on reporters published by private-third party businesses to find Utah case law. The citation format starts with the year of publication, then either "UT" for the Utah Supreme Court, or "UT App" for the Utah Court of Appeals, and then a sequential numbering system. (For example, *State v. Norris* was the sixth case released for decision by the Utah Supreme Court in 2007.) The pincite is not a page number, but a reference to numbered paragraphs within the opinion. Utah courts usually require that cases include both the "public domain" and "regional reporter" citations, though in oral argument the parties often just use the public domain citation if the case was released after 1999.

State v. Bradshaw, 2006 UT 87, ¶¶ 12-15, 152 P.3d 288, 291-92 (The terms "scheme or artifice" in the communication fraud statute mean "the overall design to defraud one or many by means of a common plan or technique, completed by calculation or planning. A single scheme can include a series of separate but similar fraudulent acts, as long as the separate acts are linked by a common, continuing criminal design. A scheme cannot be executed on impulse, but a single scheme may incorporate both an incompletely formulated plan and later deceptions whose evolution may be traced to a primordial fraudulent plan." Furthermore, a defendant who falsely represented himself as an owner of a mortgage company, asked for a $400-$600 mortgage refinancing fee, from eleven victims over the course of three months, but kept all the money for himself and absconded, showed that the defendant had devised a "scheme or artifice" and supported the jury's verdict of communications fraud.)

State v. Graham, 2013 UT App 109, 302 P.3d 824. In *Graham*, an investor went into business with a construction company to get rights to and gather reclaimed wood from an old mine for resale. The construction company billed the investor over $50,000 for asbestos removal. Overall, the investor paid the construction company over $870,000, but no reclaimed materials were ever sold and the investor never received any money back. On a charge for communications fraud related to the asbestos invoices, the Court of Appeals affirmed the trial court's decision that there was insufficient evidence for the charge. The State's only evidence was that (1) the construction company didn't have a license to remove asbestos and (2) asbestos removal was conducted by a third-party subcontractor and argued that the invoices were fraudulent because the construction company "played no role at all in the removal of asbestos." The State failed to present any evidence that the defendant was not the entity that paid for the asbestos removal, and if defendant had paid, it was "clearly" permissible that the defendant could seek reimbursement. The fact that the invoice did not specifically mention that another entity removed the asbestos was not relevant to determine whether the invoices were fraudulent.

State v. Hawkins, 2016 UT App 9, 366 P.3d 887. *Hawkins* is a case about a multi-level fraud to entice buyers to purchase undeveloped lots, finance the construction of houses on the lots, and then split the profits if the houses were sold. But different parties in the scheme made different misrepresentations to potential investors, knowing the promised financing did not exist, misrepresenting the construction company's ability to get building permits and actually build the houses, and misrepresenting returns on an investment.

Hawkins, an employee of one of the companies in on the scheme, was convicted of two counts of communications fraud for statements made to an investor. He appealed.

Part of his appeal challenged the trial court's definition of what it means to "devise a scheme" under the communications fraud statute. The Court of Appeals concluded

that there was no harmful error in the trial court's instruction, and clarified that to prove that the defendant "devised" a "scheme or artifice to defraud," the prosecution to prove that the defendant "form[ed], plan[ed], or invent[ed" the scheme. *Id.* at ¶ 36, 366 P.3d at 893.

The Court of Appeals also included that sufficient evidence supported the guilty verdict. It noted that, much of the evidence of how Hawkins devised the scheme was circumstantial, and that "jury verdicts decided on the basis of 'remove or speculative possibilities of guilt' are invalid, However, it recognized that "circumstantial evidence alone may be sufficient to establish guilt," and that fraud, "from its nature … is difficult to prove by direct evidence, and it seldom that it can be so provided." *id.* at ¶ 42, 366 P.3d at 894. The following evidence supported the verdict that Hawkins devised a scheme: (a) the utilities were "not a problem," (even though they had not been installed, and their installation was contingent on funding that hadn't been received), (b) that Hawkins had "millions of dollars" in a private trust to assure the investor of access to additional capital, even though no such funds existed, (c) that the businesses had a (non-existent) insurance policy that would "cover any loss should the home they built sell for less than promise", (d) that Hawkins' company would treat the investor to a cruise after the investor signed on, even though Hawkins used the investor's own funds to pay for the cruise, and (e) Hawkins required the investor to sign a "risk disclosure statement" about the risk of loss of an investment *after* the investor had already invested. Because Hawkins had a "role in every stage of the scheme," the jury could conclude that "he not only acted to execute someone else's scheme, but that he also had a hand in devising it." The facts supported the guilty verdict. *Id.* ¶¶ 44-45, 266 P.3d at 895.

State v. Craver, 942 P.2d 1110, 1111-14 (Utah 1997) (Convictions for fraud may be based on promises to perform an act in the future if the defendant does not intend to perform at the time the promise is made. However, "more than mere nonperformance is required to prove the defendant's intent not to perform his promise, and proof of nonperformance alone is not sufficient in criminal prosecutions based on false promises." Evidence supporting proof of present intent not to perform a future promise may include the rapidity with which commercial transactions went bad, a pattern of unfulfilled promises, the rapidity with which the defendant moved on to a new contract without finishing his promise on the first, and other circumstances surrounding the promises and their execution).

State v. Bruce, 262 P.3d 960, 962 (Utah 1953) ("A promise to take action in the future may be made in good faith, but plans go awry, unexpected or uncontrollable events intervene, or a bona fide change of mind occurs, any one of which would negate the existence of an intent to defraud at the time the promise was made, thus eliminating an element essential to constitute the crime.")

State v. Jonas, 633 P.2d 544, 159-60 (Utah Ct. App. 1996) ("An actionable fraud [does] not result from a mere failure to perform promises made. Otherwise, any

breach of contract would amount to fraud. Some evidence (beyond the mere failure to perform) must support a finding that the promise was made with a present intent not to perform.")

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IN THE THIRD DISTRICT COURT
STATE OF UTAH

STATE OF UTAH, **Plaintiff,** **v.** **STEVIE HOWELL** 1298 Ranch Road Payson, UT 84651 DOB: 3/11/1990, **Defendant.**	**STIPULATIONS** Case No. 251110980 Judge A.B. Reinhold

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

1. All of the transactions between Rescue Utah's Furry Friends ("RUFF") and/or Stevie Howell and others described in the Witness Statements and exhibits occurred in Lake County, Utah.

2. All witness declarations are authentic and were signed, under oath, by the witness on the date indicated on the declaration. Further, every witness has had an opportunity to review the witness statement prior to trial, for completeness

and accuracy. All witnesses indicated that their statements were accurate and complete and made no changes.

3. All exhibits are authentic, fair, and accurate, and no party may challenge the authenticity of any exhibit.

4. Throughout the materials, the pronoun "they" is properly used as a singular, third-person pronoun, regardless of the sex or gender of the person being referred to.[1]

5. Defendant Howell has waived their rights to a jury trial (Article I, Section 10 of the Utah Constitution). However, the parties' stipulated jury instructions may be used to argue legal points and may be used by the Court in fashioning its Findings of Fact and Conclusions of Law and in rendering a verdict in this case.

[1] *See, e.g.*, "They," *Merriam-Webster Dictionary Online*, https://www.merriam-webster.com/dictionary/they (last visited July 4, 2024) (recognizing that the "use of *they, their, them,* and *themselves* as pronouns of indefinite gender and indefinite number is well established in speech and writing, even in literary and formal contexts" and citing to examples from Shakespeare, Jane Austen, and George Bernard Shaw); "Pronouns," *Chicago Manual of Style Online*, https://www.chicagomanualofstyle.org/qanda/data/faq/topics/Pronouns/faq0031.html (last visited July 4, 2024) (recognizing that the use of "they" as a singular, third-person pronoun is an "established usage" that "has been around for a long time").

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IN THE THIRD DISTRICT COURT
STATE OF UTAH

STATE OF UTAH, **Plaintiff,** **v.** **STEVIE HOWELL** 1298 Ranch Road Payson, UT 84651 DOB: 3/11/1990, **Defendant.**	**JURY INSTRUCTIONS** Case No. 251110980 Judge A.B. Reinhold

The parties, through counsel, stipulate that the following instructions may be given to decide the case. In the event that the case is tried to the court instead of the jury, the parties agree that the Court may use these instructions to guide its Findings of Fact, Conclusions of Law, and verdict in the matter.

1. **Introduction.** The prosecution has filed a document-called an "Information"-that contains the charges against the defendant. The Information is not evidence of anything. It is only a method of accusing

a defendant of a crime. The defendant has entered a plea of not guilty and denies committing the crimes. Every crime has component parts called "elements." The prosecution must prove each element beyond a reasonable doubt. Until then, you must presume that the defendant is not guilty. The defendant does not have to prove anything. They do not have to testify, call witnesses, or present evidence.

2. **Burden of Proof.** The prosecution has the burden of proving the defendant guilty beyond a reasonable doubt. This is different from the burden of proof in civil cases, where it is only necessary to prove that a fact is more likely true than not true. In criminal cases, the prosecution's proof must be more powerful than that. It must be beyond a reasonable doubt. Proof beyond a reasonable doubt is proof that leaves you firmly convinced of the defendant's guilt. There are very few things in this world that we know with absolute certainty, and in criminal cases the law does not require proof that overcomes every possible doubt. If, based on your consideration of the evidence, you are firmly convinced that the defendant is guilty of the crime charged, you must find them guilty. If, on the other hand, you think there is a real possibility that they are not guilty, you must give them the benefit of the doubt and find them not guilty.
3. **Rule of lawyers.** The lawyers in this case will present evidence and try to persuade the fact-finder to decide the case in one way or another. The fact finder (either jury or, if a jury is waived, the judge) is the exclusive judge of all questions of fact. Do not be influenced by what the lawyers' opinions might be. The verdict should be based on the law given and on the evidence presented in court.
4. **Evidence.** The evidence in this case consists of the sworn testimony of the witnesses, regardless of who may have called them; all exhibits received in evidence, regardless of who may have presented them; and all facts which may have been admitted or stipulated. Statements and arguments of counsel are not evidence in this case. When the parties stipulate or agree as to the existence of a fact, the finder of fact may accept the stipulation and regard that fact as conclusively proved. Any evidence as to which an objection was sustained by the court, and any evidence ordered stricken by the court, must be entirely disregarded.
5. **Direct v. Circumstantial Evidence.** Though people use the terms "circumstantial evidence" and "direct evidence," the law does not treat one type of evidence as better than the other. Facts may be proved by direct or circumstantial evidence. Before the defendant can be found

guilty of any charge, there must be enough evidence–direct, circumstantial, or some of both–to convince you of the defendant's guilty beyond a reasonable doubt.

6. **Credibility of Witnesses.** Testimony in this case has been given under oath. The finder of fact must evaluate the believability of that testimony. The testimony of a witness may be believed in total or in part. One witness may be believed even against the testimony of many witnesses. If a witness has intentionally testified falsely about an important matter, the entire testimony of the witness may be disregarded, or only the intentionally false testimony may be disregarded. In evaluating the testimony of a witness, the following may be considered:
    a. Personal interest: Was the accuracy of the testimony affected one way or another by any personal interest the witness has in the case?
    b. Bias: Was the accuracy of the testimony affected by any bias or prejudice?
    c. Demeanor: The witness's appearance, conduct, or actions can result in more or less weight being given to the testimony.
    d. Consistency: Did the testimony tend to support or not support other believable evidence that is offered in the case?
    e. Knowledge: Did the witness have a good opportunity to know what the witness is testifying about?
    f. Memory: Does the witness's memory appear to be reliable?
    g. Reasonableness: Is the testimony of the witness reasonable in light of human experience?

    These considerations are not intended to limit how to evaluate testimony; however, a witness's religious belief is not relevant in evaluating his or her credibility.
7. **Defendant Testifying.** The defendant testified at trial. The previous instruction mentions some things to think about in weighing the credibility of witness' testimony. Consider those same things in weighing the defendant's testimony. A defendant's testimony should not be rejected merely because they are accused of a crime.
8. **Expert opinions.** Some witnesses, because of education or experience, are permitted to state opinions and the reasons for those opinions. Opinion testimony should be judged just like any other testimony. It may be accepted or rejected in whole or in part,

considering the witness's education and experience, the reasons given for the opinion, and all the other evidence in the case.

9. **Required Mental State.** A person cannot be found guilty of a criminal offense unless that person's conduct is prohibited by law, AND at the time the conduct occurred, the defendant demonstrated a particular mental state specified by law.

   "Conduct" can mean both an "act" or the failure to act when the law requires a person to act. An "act" is a voluntary movement of the body and it can include speech.

   As to the "mental state" requirement, the prosecution must prove that at the time the defendant acted or failed to act, they did so with a particular mental state. For each offense, the law defines what kind of mental state the defendant had to have, if any. For some crimes the defendant must have acted "intentionally" or "knowingly." For other crimes it is enough that the defendant acted "recklessly," with "criminal negligence," or with some other specified mental state.

10. **Inferring the Required Mental State. T**he law requires that the prosecutor prove beyond a reasonable doubt that the defendant acted with a particular mental state. Ordinarily, there is no way that a defendant's mental state can be proved directly, because no one can tell what another person is thinking. A defendant's mental state can be proved indirectly from the surrounding facts and circumstances. This includes things like what the defendant said, what the defendant did, and any other evidence that shows what was in the defendant's mind. A defendant's "mental state" is not the same as "motive." Motive is why a person does something. Motive is not an element of the crimes charged in this case. As a result, the prosecutor does not have ot prove why the defendant did what they did. However, a motive or lack of motive may help determine if the defendant did what they are charged with doing, or what the defendant's mental state was at the time.

11. **Consider only verdict.** In this portion of the case, the factfinder should only consider whether the defendant is guilty of the crimes charged and should not consider what publishment could result, or whether any particular crime is a lesser-included-offense of a more serious crime.

12. **Crimes charged.** The prosecution has charged the defendant with three crimes: Communications fraud, as a second-degree felony; Communications fraud, as a Class A misdemeanor, and unlawful use of technology to defraud. The fact-finder must review each charge

separately and decide whether the prosecution has met its burden to prove, beyond a reasonable doubt, that the defendant committed each crime. The elements that the prosecution must prove for each crime are described below.

13. **Communications fraud, second degree felony.** To convict the defendant of the crime of Communications Fraud, a second degree felony, the prosecution must prove the following elements beyond a reasonable doubt: (1) That the defendant devised a scheme or artifice to defraud the donors of RUFF or that they sought to obtain money, property, or anything of value from RUFF's donors; (2) That the defendant did so by means of false or fraudulent pretenses, representations, promises, or material omissions; (3) That the defendant communicated directly or indirectly with any of RUFF's donors by any means for the purpose of executing or concealing the scheme or artifice"; (4) that the defendant's pretenses, representations, promises, or material omissions made or omitted were made or omitted intentionally, knowingly, or with a reckless disregard for the truth; and (5) the value of the property, money, or thing obtained or sought to be obtained was or exceeded $5,000. If the prosecution has met every element of this claim with proof beyond a reasonable doubt, then the defendant should be found guilty. If the prosecution has not proved each and every element of the crime, then the defendant should be found not guilty.

14. **Communications fraud, class A misdemeanor.** To convict the defendant of the crime of Communications Fraud, a class A misdemeanor, the prosecution must prove the following elements beyond a reasonable doubt: (1) That, on or about December 29 2023, the defendant devised a scheme or artifice to defraud Robin McCallister of money, property, or anything of value; (2) That the defendant did so by means of false or fraudulent pretenses, representations, promises, or material omissions; (3) That the defendant communicated directly or indirectly with any Robin McCallister by any means for the purpose of executing or concealing the scheme or artifice"; (4) that the defendant's pretenses, representations, promises, or material omissions made or omitted were made or omitted intentionally, knowingly, or with a reckless disregard for the truth; and (5) the value of the property, money, or thing obtained or sought to be obtained exceeded $500 but was less than $5,000. If the prosecution has met every element of this claim with

proof beyond a reasonable doubt, then the defendant should be found guilty. If the prosecution has not proved each and every element of the crime, then the defendant should be found not guilty.

15. **Unlawful Use of Technology to Defraud.** To convict the defendant of the crime of Unlawful use of Technology to Defraud, a second degree felony, the prosecution must prove the following elements beyond a reasonable doubt: (1) That the defendant used, or knowingly allowed another person to use, a computer computer network, computer property, or computer system, program, or software; (2) That the technology was used to devise or execute an artifice or scheme to defraud RUFF's donors or obtain money, property, a service, or other thing of value from RUFF's donors; (3) That the defendant used false or fraudulent pretenses, representations, promises, or material omissions in the scheme or attempts to obtain money or property; (4) That the defendant's pretenses, representations, promises, or material omissions made or omitted were made or omitted intentionally, knowingly, or with a reckless disregard for the truth; and (5) the value of the property, money, or thing obtained or sought to be obtained was or exceeded $5,000. If the prosecution has met every element of this claim with proof beyond a reasonable doubt, then the defendant should be found guilty. If the prosecution has not proved each and every element of the crime, then the defendant should be found not guilty.

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Prosecution Witness Statements

Witness statement of Sloane Sanderson

My name is Sloane Sanderson, and until recently, I was the unofficial “vice president” of Rescue Utah Furry Friends (“RUFF”). I helped build that organization from the ground up. That is why I felt the need to blow the whistle on Stevie Howell.

I was born and raised in West Jordan, Utah. You could say we were 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 the University of Utah in 2015 and moved to California to make a name for myself. I have a BA in computer science and IT and figured it was the perfect place—Silicon Valley has all the newest tech companies. I took a job as a Project Manager for a start-up that focused on home security. Basically, I worked with a team to create new tech and then collaborated with clients to help get the tech up and running. I know that’s kind of like a dream job for every college graduate but I can’t lie, the startup business was a grind. I was putting in like 70-80 hours and it was brutal work. Iterations and iterations of the same product over and over again and spending all day on my computer. Not to mention the clients were so needy and incompetent. How many times do I have to explain how to install a software? I had no social life and I was getting depressed, despite the Bay Area’s boasts of perfect weather all year round. The long hours were getting to me and I felt like I was constantly snapping at my supervisors. They were idiots and didn’t understand the nitty-gritty details of what was actually going on. I think I snapped at them a few too many times because in 2017 I was asked to leave.

Without a job, there was no way I was going to afford Bay Area rent. I moved back to Utah and started doing some freelance IT jobs. Honestly, the money I was making wasn’t too bad. Contractors can make decent money if they get jobs consistently. I was doing a little bit of everything—installations, temp work, security upgrades, that kind of thing. Actually, I was doing security upgrades when I met Stevie Howell.

I met them sometime in late 2018 when I was contracted to do some updates to the gas station where they worked. It was a pretty extensive overhaul of the system—inventory tracking and external security, so I was staying at a hotel down in Emery for a few weeks while I worked. Stevie was an employee at the “Grab-n’-Go” gas station. They were personable and had a good work ethic. It was also clear Stevie really, really cared about animals. They had just adopted some dogs that had special needs from some tragic fire. They mentioned how their dream was to work with animals and they were just working at the gas station for some money. Stevie’s dog Eddie was often around the

store, but have you seen that dog? He is scary and I never wanted to be around him. Also, he shed a ton and made my allergies act up. Stevie and I became friends, though, and exchanged numbers before I went back up to West Jordan.

A few weeks later, Stevie called me, obviously very excited. Apparently their boss had spoken about the plight of the dogs on the news and now a lot of people wanted to donate, specifically to Stevie! It seemed like an incredible opportunity, especially because that was their dream. I also saw it as a great chance for me to get out of the freelance game. I helped Stevie organize the money they had gotten at the gas station, and we put it to good use building some kennels and space for the dogs on their farm. Stevie even started getting calls about adopting some dogs and surrendering others to them that might need help. It seemed like things could grow very quickly. But after about a couple months, it turns out I was wrong and things slowed down. People's attention spans move on fast if they find a different cause.

Stevie 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 could form a charity to address the needs of dogs with disabilities. Using donations, we would locate dogs in need of help, facilitate their transport and temporary care, and hopefully find their new "forever home." 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—we're all familiar with the Sarah McLachlan commercials—but there is a real problem in finding new homes for disabled animals. Think about it. They usually require time-intensive attention, and most are anxious because they were never trained properly. I won't lie, I saw the demand for this type of organization, and I knew it would help my future career if employers knew I helped save dogs. Everyone likes dogs! Well, I don't, but the important thing is that other people do.

Marketing came naturally once Stevie rescued those dogs in 2018. The local media went nuts over it. Stevie had TV interviews, and I pulled some strings for a presentation spot at the Rotary Club in Provo. Our RUFF website went online in February 2019. I think Stevie and I had sole access in the beginning. One of our supporters suggested the brilliant idea of going through Neighbors Crowdfunding Neighbors (NCN). It avoided having to register as a tax-exempt organization with the IRS. The NCN information and linked webpage went live in the late spring of 2019.

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

guess you could say I was responsible for teaching Stevie how to solicit bigger donations. I *had* worked at a startup, after all.

By summer 2020, we had everything up and running. We had a number of volunteers. I never took a salary for my work. I still did freelance IT and security work to pay my bills. I helped RUFF primarily with the organization strategy, and Stevie handled the finances. Stevie was responsible for paying bills and expenses, receipt of donations, and served as the primary contact for the donors themselves. I will admit we did not have precise job duties for each person in the organization. After all, we weren't a Fortune 500 company with hundreds of employees. We all helped where we could. Looking back, the right hand didn't know what the left hand was doing. Still, I believe only Stevie and I had moderator access to the RUFF and NCN websites, and I certainly had no interest in posting cutesy-wutsey pictures of dogs, so Stevie must have been the only one.

Stevie had a habit in the beginning of running big donations by me. Stevie said "I want to make sure their money is spent on something that matters," or something like that. I would estimate that in the fall and winter of 2023, Stevie asked me about three different donations before processing the receipts. One was a small donation that seemed to have some problem with the bank, and two of them were from Robin McCallister in the amounts of $1,000 and $5,000. Stevie wanted to make sure the donations were above board. I reviewed them, and Robin seemed genuine. At that time, I believed Stevie stopped telling me about big donations in January 2024; I assumed Stevie finally felt comfortable processing big payments.

At some point, Stevie decided to move the charity—and the dogs—closer to Utah Valley, to potential donors and dog adopters. They bought a little property and settled in Payson, which was close enough to people to be relevant, but still small town-y enough. It was perfect for fostering the dogs. Stevie called it "the farm." I never went there. At least never past the driveway. Don't get me wrong; I love rural towns. They have great coffee, local diners, available tee times, and everyone is incredibly nice. I just didn't want to risk my allergies visiting a literal dog farm.

By January 2021, Stevie began to take more leadership of the organization. I was concerned at first, because they didn't seem like they knew a ton about business. But after the first couple of months, I stopped reviewing the transactions and took a backseat role because Stevie had proved to not be *that* incompetent. That was fine by me. Then Robin McCallister called me out of the blue. I was not expecting a call from Robin. I also was not expecting to hear how much Robin had donated. Robin said Stevie met one-on-one to solicit a large donation. I do not remember seeing or hearing about any individual meetings. I did not think we were big enough yet to justify personalized meetings. Like I said, we weren't a Fortune 500 company, and we didn't exactly have Bill Gates on our donor rolls.

Robin also claimed we fraudulently used their donations. I could not believe it. Our organization was a well-oiled machine. I looked into recent expense reports. Most of them seemed fine. Gas expenses from here to there; standard operational stuff. I recognized some transactions from New York because I've had clients out there. I believed those were suspicious. I suppose a charity organization could justify dinner and a show if it led to donations, but I never heard about them, and Stevie never ran any donations made for the purpose of this New York City trip. Besides, why would an organization for dogs spend money to see "Lion King"!? Last time I checked, a lion is a cat! Additionally, I had no idea where Stevie came up with the money for this New York City trip. I pressed them, and they admitted to me that Robin had written them a check for $4,000 in December 2023 that they conveniently never mentioned to me.

I then saw the two big transactions in early 2024. The first was the $50,000 donation received in January and a $90,000 expenditure in February. That coincided with Stevie's new pickup truck. I remember Stevie driving it around and saying how "awesome" it was. I saw a picture of the truck in this case. People buy cars all the time. It didn't strike me as odd until I saw it on our balance sheet. I don't see how a big pickup truck, especially one that was almost $100k, would help the organization. It also seemed fraudulent because—I assume—Stevie told Robin we were going to spend the money on dogs.

Then I saw the expenditure for a pool. I saw it on the revenues and expenses report and found an invoice for it in our organization records. I was shocked. Stevie billed a $123,000 pool directly to the company! And it was conveniently installed in Stevie's backyard?? The organization kept payment records like this for basic expenditures, but still to this day I cannot imagine any legitimate purpose for that pool.

I drove to the farm. From the road, maybe 100 yards away, I could see there was a shiny new pool in the back. It was ridiculous. It was fenced in and might have had a cabana. I called Stevie from my car and politely asked what was going on. Stevie said, "You don't get how this works. You never understood. This is how the game works." Sure, I never handled donors or drove the dogs around, but I cannot imagine how a personal truck, personal flight, and personal pool totaling way over $200,000 could be legitimate expenses!

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

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

I am familiar with Exhibit 4, Exhibit 5, Exhibit 6, Exhibit 7, Exhibit 8, and Exhibit 10

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

DATED this ***2nd*** day of ***August***, 2025

/s/ Sloane Sanderson

Sloane Sanderson

Witness statement of Quinn Prescott

My name is Quinn Prescott and I am currently employed as a Forensic and Financial Crimes Analyst for Lake County, Utah.

I was born in Paris, TX, and had an uneventful childhood, though one filled with family picnics, T-Ball and then soccer games. My interest in science and numbers began to grow when I was 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 Utah State University (because they gave me a full ride) where I got my bachelor's degree in math in 2010. To be honest, my interest in forensic science and analysis was launched from watching CSI: Crime Scene Investigation while I was in college. Gil Grissom became my hero. So, 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 math from USU, I received a minor in both accounting and criminal justice.

I obtained an internship with the Cache County Judicial Office in 2010. Most of this work was administrative, but I did get to review some of the criminal case files. After a year of interning, I decided to advance myself and obtained a Master of Professional Science Degree from Boise State, concentrating in the areas of fraud management and economic crimes. Over the summer, I applied for and completed the basic training, and received my Law Enforcement Officer certification with Utah Peace Officer Standards & Training. After graduating from Boise State in 2013, I obtained Certified Forensic Analyst status from the University of Utah in 2015, with special training in government and forensic accounting. Since then, I have received several certifications (see my C.V.) and am an active member of the American Academy of Forensic Sciences (AAFS), where I am also 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 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, helping to improve and distribute accessible, high quality, science-based forensic standards; (2) to serve the public by serving as an expert witness; (3) become the head of the FBI Laboratory Services at Quantico.

I became involved with the Stevie Howell case in April 2025 after receiving a call from my colleague Kyle Conway at the Utah Attorney General's Office. The AG's Consumer Protection Department had received a complaint from an individual (who I later learned was Robin McCallister), who claimed that Stevie Howell and Rescue Utah's Furry

Friends (RUFF) defrauded them by claiming to rescue or help special needs dogs (I'm a parakeet person myself). It turns out there were a lot of people, a lot of money and a lot of suspicious activity. Conway contacted me to see if we could start a criminal investigation as the AG's Office was unable to do so at this 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 Howell matter.

The AG's office was able to obtain a release from the alleged victim, who provided me with the complaint they filed with the AG. After reviewing the complaint, I put together an investigative team, including a law enforcement liaison, technology specialists, someone knowledgeable about charitable scams and, of course, counsel from the County Attorney's office.

My standard protocol for conducting forensic analysis investigations, and what my team discovered pursuant to those protocols, is as follows:

Step 1: Conduct a preliminary assessment

The team conducted some initial review of the information we had: McCallister's statement, letters, and emails to McCallister, pictures, and other information and the RUFF website. This led us to:

I. Understand the context of the issue;
II. Identify individuals with relevant information;
III. Establish the availability of evidence; and
IV. Identify whether, if all the allegations were true, a crime could be identified.

Step 2: Preserve and collect evidence

The next step in a fraud investigation is to take steps to preserve any documentary evidence -- electronic and hard copy -- that might exist. The team's law enforcement liaison and attorney obtained warrants to seize and obtain:

I. RUFF Company's computer and network files;
II. Howell's personal computer, cellphone and tablet;
III. Documents stored on Howell's personal and organization hard drives;
IV. Emails and email archives from Howell, RUFF and employees;
V. Text messages or other communications stored on Howell's personal and organization cellphones; and
VI. Bank, credit card and RUFF records relating to Howell and RUFF.

The victim in this case, Robin McCallister, and a former volunteer with RUFF, Sloane Sanderson, voluntarily allowed us to review the documentary evidence they had in their possession.

Step 3: Analyze financial, organization, and electronic records

My team conducted a comprehensive analysis of the financial, business, and electronic records of RUFF and Howell. My approach to fraud investigations uses an analytic approach that combines rules-based analytics, algorithms based on machine learning, and data visualizations to identify fact patterns.

An important aspect to analysis is to look not only at the evidence before us, but to look for items that are not present – organization records, receipts and invoices, materials supplies and equipment needed to carry out a legitimate organization, insurance coverages and so forth. Lucky for us, 3 of the team members had dogs and two have used kennel services in the past, so we had some knowledge of the organization and how it should be run.

Step 4: Conduct interviews

We interviewed the fact witnesses after some of the financial, business, and electronic records have been analyzed, so our questions can be more focused. We interviewed the following persons:

I. Robin McCallister, alleged victim;
II. Sloane Sanderson, former consultant with Rescue Utah's Furry Friends;
III. Customer Service Representative for RUFF; and
IV. Stevie Howell.

We conducted one round of interviews after a short review of the financial records; we did not think it necessary to conduct further interviews after the full review of the financial records.

Step 5: Analysis

Our analysis is contained in the Investigation Notes for the RUFF Revenues and Expenses for 2023-2024. Categories of expenses were marked either:
L: appear legitimate AND/OR
Q: questionable – unable to verify because no documentation or explanation unsubstantiated

Based on the efforts of my team and the analyses we conducted, I submit the following:

I. We reviewed information from February 1, 2022 through June 30, 2024. Our financial analysis focused on the 12-month period between July 1, 2023 and June 30, 2024.
II. Sometime in the fall or winter of 2018, Howell appears to have rescued and rehabilitated a deceased neighbor's 10 dogs. Howell's efforts were

covered in local media, and individuals sent Howell donations to assist with the dogs.

III. On or about February 2, 2019, Howell files nonprofit incorporation documents with the Utah Department of Commerce, Division of Corporations for “Rescue Utah’s Furry Friends.” Investigation revealed that the organization does not have 501(c)(3) tax-exempt charity status with the IRS. As a result, none of the donations to RUFF can be taken as tax-deductible donations by alleged victims. It is outside of the scope of this analysis to determine whether the alleged victims knew their donations were not tax-deductible and our investigation did not look at any of the tax issues that may have been present.

IV. Howell puts up a website in February 2019 and added RUFF in June. From June 30 2022 through March 30 2023, Howell’s RUFF site obtained 533 donations, only one of which (McCallister, Mar 2023) was over $500.

V. From August 1 2023 through June 30 2024, there appeared several donations in excess of $500, including alleged victim McCallister’s donations of $1,000 (November), $4,000, $5,000 (December) and $50,000 (January). All the funds were deposited in RUFF’s organization checking account.

VI. As of March 30, 2023, there was $2,113.09 in RUFF’s checking account, which was verified by contacting the bank.

VII. 7. In March 2024, a donation of $30,000 was received from a donor who requested not to be identified and was unwilling to be interviewed.

VIII. Expenditures: from July 1, 2023 through June 30, 2024, we examined 53 expenditures. The results of the investigation are in the Investigation Notes accompanying the Revenue and Expenditure spreadsheet. Of these transactions, at least 13 appeared to be questionable relative to operating a dog rescue organization, including but not limited to the following:

A. December 21, 2023: thank-you holiday dinner party for supporters of Minnesota Nice Pet Rescue at X-clusive table, $440. Number of attendees: 2.

B. January 2024: $99,000 withdrawn from RUFF’s checking account, allegedly for a company vehicle.

C. February 7 – 14, 2024: 2 $150-package tickets to the Westminster Kennel Club Dog Show; round-trip airfare for two to New York, total $700; 7-day stay at Upper East Side Hotel in New York, $3213.87; meals for 7 days, $1,232.13; 2 tickets to the musical “The Lion King,” total $498.00; other daily necessities, $75.00.

D. April 2024: swimming pool installation, $123,500; purpose unclear (Howell alleges it was for the dogs). We received the invoice that was submitted for the pool purchase and installation.

IX. Absence of expenses: my review of the financial transactions of RUFF did not locate payments, any liability or property insurance protecting the staff or premises. In addition, my calculations (available on request) indicate that, based on the number of animals Howell and RUFF allegedly served, an overabundance of food and dog-care supplies were ordered. There also seems to be an implication on the RUFF site of greater staff-to-dog ratios than other documents support.

Last, we reviewed RUFF's Balance Sheet, which compares cash, assets, and debts between 2023-2024 and the prior year, to determine if there were any irregularities. It appears that almost all of the numbers in the 2023-2024 were "amended," looking at the numbers for Current Assets, Fixed Assets, Total Assets, Long-Term Liabilities, Total Liabilities and Total Net Worth. Examination revealed that fonts were different, the alignment was off on some numbers, and the document appeared smudged in some places, as if someone had used paint or something to cover up the original numbers. In this age of computers, you don't normally see these types of revisions. In addition, we noted that:

I. Current Assets (cash) appear too high when compared to the cash in bank
II. Fixed Assets, such as major equipment and property (like the truck in January 2024 and a swimming pool in April 2024) are questionably listed for RUFF
III. Long-Term Liabilities (debts, long-term loans) did not appear to match up with anything and clearly the Total Liabilities number had been changed

These "amendments" make it look like RUFF has more money than it does.

I am familiar with Exhibits 1, 2, 3, 4, 6, 7, and 8.

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

DATED this 31st day of October, 2025 /s/ 

Quinn Prescott

Witness statement of Robin McCallister

My name is Robin McCallister. I am 74 years old and have lived in the same house I grew up in here in Salt Lake City. When I was young, my parents would not let me have a dog in their “nice house.” They passed when I was in residency at the University of Utah Hospital in 1983, so 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 had just finished residency and started working as a principal care provider at a local clinic in Salt Lake. Tuff had some kidney problems and I finally had to have Tuff’s leg amputated to get rid of a tumor. Tuff passed when he was 11 in his own little bed one night in August 1988. I spent thousands of dollars on keeping this dear doggie alive and began to wonder what my patients do for their furry friends – 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, but at the time I was $300,000 in debt due to medical school.

It took me some time to pay off my medical school debt. I made my final payment in 2002, 15 years after I finished residency! After that, I was able to finally make a decent living, no longer having to fork over a sizable portion of my paycheck to debt payments. I didn’t make anywhere near as much money as surgeons, but I was able to pay the bills and help my patients. In 2004, I told the pound that I wanted to care for an aging, even sick doggie. I had Thea, a Springer Spaniel, for five years, until 2010 when she eventually died of liver problems. Then I cared for Marvin, a beautiful lab who had been previously hit by a car as a puppy and was not able to walk properly. Marvin died last year. Now I have Sammy, another three-legged Chihuahua. Sammy likes to stay in the house all day, which is fine by me.

When I picked up Sammy from the pound, the employee there told me that there are websites where people tried to get help for their sick doggies. I didn’t know anything about computers beyond what I used at the clinic, so I took a free class at the library and bought a laptop and began to search for dogs to help. With the money I had saved up from working as a PCP, I knew I could make a difference. I came upon a Neighbors Crowdfunding Neighbors page when I searched for ‘sick dogs.’ A group called Rescue Utah’s Furry Friends indicated it was seeking funds to help a dog get dental surgery. They had matched up with a dog dentist up here in Salt Lake 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, Stevie Howell sent me a nice

thank you card. The return address was from Payson here in Utah. My first donation was in March 2023.

So I kept looking at either the NCN or the RUFF website webpage. Stevie Howell happened to live a little over an hour south of me, and was helping dogs all over the state. Some had extreme health needs and needed surgery, others were in need of adoption because their owners could not care for them. Sometimes they delivered food and paid for a dog's medication.

In November 2023 I donated $1,000 to help a dog named Peanut in Cedar City who needed daily insulin shots just like me! I still have the dog's photo right where I can see it. When Peanut passed, Howell forwarded a lovely thank you card from the owner, saying that I extended Peanut's life many months. They sent me a nice photo of Peanut, which is on my fridge. It seems like there was a doggie in distress every few days.

The next month, December 2023, I helped finance a dog rescue operation in a hurricane zone. RUFF brought the doggies to Utah. I donated $5,000 to that worthy cause.

I also wrote Stevie a personal check on December 29th, 2023 for $4,000 for a business trip to New York City. They promised to use the trip as a networking opportunity where they would attend the Westminster dog show and meet potential new donors in February. I was shocked to later hear from Stevie that they didn't talk to anyone at the dog show! They told me about their trip with such excitement and thanked me for helping fund it, but they did not do anything they promised to do with my money. I wish I had found this out before I made my donation in January 2024.

In January 2024, my life changed. Stevie wanted to come up to the city to visit me in my home. We visited and had coffee in the living room. Howell explained they had been basically running the rescue and wanted to build some nice kennels on a farm to house the animals waiting for adoption. There would even be a doggie pool for dogs with leg problems so they could help the dogs exercise.

RUFF would find other caring folks, just like me, to help out. Howell said people would be more trusting in contributing to an organization with a fancier website and photos. Howell asked if I could find it in my heart to donate $50,000. I told Howell I would have to think about it, as that would be the last of my money. Howell quickly pointed out that with an actual organization, people could include property and cash in a will. Howell said they would put a big photo of me in the lobby or office. It would be framed with my name and a caption, "Robin McCallister: A dog's best friend." Well, I was hooked and gave a check for $50,000 to Howell. I had done a decent job saving throughout my physician years, but this $50,000 took my savings to a state where I was unsure whether or not I would be able to make it through my retirement. I didn't care. The dogs were going to be happy.

After that I was too sad to look at the website. I did not want to see doggies I could no longer afford to help. Finally, in February 2025, I looked at the RUFF website and managed to go online and they had a gallery of dogs that needed help and dogs that had been helped. If you clicked the doggie's photo, you could read their story. Well, what do you know—there's Peanut from Cedar City! I click the photo and they say his name is Vanilla Wafer and he had leg surgery. No, Peanut kept his legs. I went to the fridge and got Peanut's photo—same photo! Same coloring. Same eyes. Same background!

And imagine my surprise a few months later when I saw a picture of Toby, the dog I paid to get his teeth fixed, but this time he was called Bart and the website said he was rescued from Texas. I reviewed Exhibit 9 and the top left picture is of Peanut which the website thing called "Vanilla Wafer" and the picture next to it is of Toby which the website called "Bart." I was very confused and began to feel a bit strange about the whole thing.

Also on the website was a photo of a kennel on a farm. The farm was "near Payson." What if that was wrong too (or worse, fake). So I drove out that way and with the help of a friendly Utah County deputy, I got directions and went to the farm. There was an outdoor kennel with some dogs next to a nice, new shed. I was too shy to drive in. I did see a big shiny new G150 truck. When Howell came to my house, they were driving an old truck. Now this situation might prove me a fool, but I am not a complete fool. Those big G150 electric cars are crazy expensive things that cost more than what was left in my bank account. Exhibit 10 looks like the big, fancy G150 electric truck that I saw out at the farm.

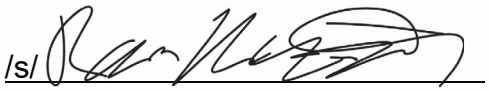
And then I saw Stevie Howell, unloading groceries from the back and taking them into the house – NOT the shed! And I could see there was a new looking swimming pool. I know those don't come cheap. The bottom picture in Exhibit 8 is what the pool I saw looked like. I drove back home mad as a hornet!

I called Howell, who said they could explain – the G150 was for the dogs! I did not believe a word out of their mouth. A new Chevy van would cost half of what a G150 cost! Finally, I said that I felt cheated out of all my money and was going to do something about it. I read all the time about people in this state being duped. Utah has one of the highest fraud rates in the country, so I had been on high alert for years. I clearly was not on high enough alert. I was embarrassed so instead of calling the cops, I started making phone calls and eventually I talked to a person that works for Utah's Fraud investigation agency, and that's why I'm making my statement. I'm glad Howell is going to get what is coming to them. Every day I think about all the dogs whose picture was used just for show. Just to get money out of people's pockets. My pockets.

I know my money paid for all or part of that fancy truck Howell is using and maybe the swimming pool. I want my money back. Hopefully, Howell will be convicted. I plan to bring a civil suit to recover the money Howel swindled me out of.

I am familiar with the image of the pool in Exhibit 8, Exhibit 9, and Exhibit 10

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

DATED this ***24th*** day of ***June***, 2025 /s/ 

Robin McCallister, M.D.

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Defense Witness Statements

Witness statement of Stevie Howell

My name is Stevie Howell. I understand that I've been charged with theft. I make this statement knowingly and voluntarily, waiving my rights under the Fifth Amendment to the United States Constitution and Article I, section 12 of the Utah Constitution.

I am a dog person. I was born in 1990. I have a brother who is two years older than me and a sister who is three years younger. I grew up on a cattle ranch outside of Orangeville, which is located in Emery County. My Ma and Pa operated under a production contract with the Utah Cattle Company ("UCC"). We ran 200 head and had an exclusive sale contract with UCC. That labor included me and my siblings, and through this labor, I grew to love animals. We also grew alfalfa to make ends meet. Ma and Pa got paid based on the weight of the calves that we shipped to the company each year.

It wasn't an easy life, especially after the Utah E-coli outbreak in 2000 when I was ten years old. Consumption of beef was down and UCC reduced the allotment of calves they would buy from our ranch, so our income went down, but the mortgage and other expenses stayed the same. Mom got a job at the Wall-Mart in Castle Dale and Dad was a subcontractor for a landscaping business on the weekends.

After the E-coli outbreak, we got by, but after several years, my father just got burnt out and started to make mistakes. Once, during a particularly hot and dry spell, several of our calves got sick and did not weigh enough to be sold that fall. Pa blamed me for not handling my responsibility for ensuring proper water and feed for the calves, but I knew that the cause was a leaky water trough that Pa never got around to fixing. I was only 13. I don't think my Pa ever forgave me for that.

Things went from bad to worse in 2005. Our remaining herd had an outbreak of Mad Cow disease. It's some kind of "prion" disease according to the doctor. All our cattle had to be slaughtered and burned to prevent any spread to other cattle or humans. My family could not afford to get started with a new herd of cattle. Our money ran out and my Ma and Pa split. They gave up what was left of the farm to the bank, Dad took off for California and my Mom moved us in to live with Grandma and Grandpa in Emery. Living on the farm had one advantage and that is all of the pets we had. I showed rabbits in the state fair up in Salt Lake every year, 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, he was an Australian Cattle Dog/German Shepherd cross. I had taught him to do tricks and things.

I did alright in school, but I knew we didn't have the money to send me to college. Dad wasn't helping at all, but when we filled out that FAFSA student aid thing, turned out my Dad was making pretty good money in California, so I wasn't going to get much. Talked

with other kids in my class and some said they were looking at enlistment in the military. I started looking at it and 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 Emery High School in June of 2008 and it was off to Fort Leonard Wood in Missouri, where I did my 10 weeks of basic training and then 17 weeks of advanced training at the Military Police School there. I figured being an MP would position me for selection to become a military dog handler, but the Army had different plans for me. After training, I moved around a few posts and did well enough to make E-3, what most would call a private first class. I also took the test and finally got my dream assignment to attend the 11-week basic 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 obedience work-up for basic patrol work was ok, but learning to train a dog to detect explosives was a ton of work. I got through it and graduated.

In August 2010 I was deployed to Afghanistan. When I got there, I was assigned Eddie, a two-year old Dutch Shepherd/Belgian Malinois cross. It took a while for us to bond. Eddie’s former handler had rotated home and I think Eddie missed him until we built up the mutual trust needed between a handler and their dog. We worked together well and I opted to do two tours of duty of nine months each just to be with Eddie. That all changed on February 22, 2012.

Eddie and I were working out of the Bagram air base north of Kabul. We were assigned to accompany a squad running a patrol through a village near the base where there had been some violent protests recently. Eddie was there to detect any improvised explosive devices that may have been planted in the area of our patrol. Some youths stepped out from behind buildings and threw rocks at us. The Sergeant leading the patrol told us to chase the kids off. Eddie was on a long lead and I let him get about twenty-five feet in front of me. We turned a corner and from the top of a building across the street, I saw a man light and toss down towards us a flaming bomb (we called them Molotov cocktails). It hit near Eddie and he was severely burned and lost his left eye. I got burned a bit smothering the flames. We got evacuated by helicopter back to the base.

With his injuries, Eddie was no longer able to continue in service and the veterinarian was going to put Eddie down. I wasn’t going to allow that to happen, and I lost it and told the doctor and her staff that if they tried to put Eddie down, she was not the only one going home in a body bag. The Captain for my unit was called and he came and talked me off the cliff and got the staff to agree to treat Eddie. I was looking at a Court Martial and potential sentence to Leavenworth prison. Mom contacted our congressman and he

stepped up and got me a deal. I received an “other than honorable discharge,” but more importantly, they allowed me to adopt Eddie.

My “other than honorable discharge” from the Army made it so I would not get the education benefits for which I had enlisted. So there I was, twenty-two years old, broke, no job or idea what I should do next. I moved in with Mom and got a job as a cashier at the “Grab-n-Go” gas station on I-70 in Fremont Junction doing the overnight shift. Got a little scary at times, but the manager let me keep Eddie with me behind the counter and even though he only had one eye, a look from it and his growl would keep anyone from trying to pull something.

I saved up enough and started online classes at Utah Valley University (UVU), and was able to rent an old farmhouse outside of Freeport. Heading home from work in the early morning of November 23, 2018, I saw a bunch of emergency flashers in the distance and as I got closer, I saw two fire trucks and a sheriff’s deputy’s car in front of Old Man Jensen’s place. It was on fire.

I pulled into the driveway and saw it was one of the Emery County sheriff’s deputies I knew from her stopping by for coffee at the Grab-n-Go. She would stay a bit on slow nights and play tug of war with Eddie with his chew toy made from an old fire hose. I explained to the deputy I lived down the road and had gotten to know Jensen pretty well as I helped him with getting groceries and with his dogs. I guess Jensen would be termed a hoarder because when I helped bring in the groceries into his kitchen through the back door, I saw piles and piles of books, magazines and newspapers stacked everywhere so you could barely walk through the place.

While the deputy and I watched, one of the EMT’s from the fire department came up and said they had found Jensen in the living room. The EMT said Jensen wasn’t burned too bad and was able to say that he must have fallen asleep while he was smoking and listening to the radio. The EMT said they were taking him to the hospital, but it did not look like he was going to make it, because of the smoke inhalation and not being in very good shape before the fire. They were right: he died the next day.

The deputy knew that Jensen did not have any family and that I trained dogs in the Army. She asked if I would be willing to take Jensen’s pack of dogs in with me while they sorted out what was going to be done with them if Jensen didn’t make it. I agreed and we got all ten of them (including two that got a bit scorched in the fire) into my truck and the deputy’s squad car and drove them over to the farmhouse I was renting. Couple days after Jensen’s funeral, I got a call from Sheriff Griffith that the county’s animal control folks would come by to pick up Jensen’s dogs and take them into be put down unless I could find a rescue shelter for them.

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

There was just no way I was going to put down the other seven. Then again, I was going to have a hard time paying the vet bills on the little I was making at the Grab-n-Go, what with rent on the farmhouse and my tuition. My boss was really nice about it. She let me put a donation box with pictures of the dogs out when I was working and was ok with my asking folks to put their change in to help with the bills for the dogs. Well, folks would sometimes ask what it was all about, and after I told them the story, they often pulled a twenty from their wallet and put it in instead of their change.

Soon after I put out the donation box, I spoke with Sloane Sanderson, a contractor that Grab-n-Go hired to update our IT systems, about ways we might do more to get money to help care for Jensen's dogs. Sloane was an IT professional who had recently been laid off so they were taking freelance work for various chains around Utah, and they spent a few weeks upgrading both the internal inventory tracking and security of our systems at Grab-n-Go. We had hit it off and exchanged contact information due to a shared interest in animals, but they were never comfortable around Eddie; Sloane said something about allergies.

Then one day a reporter from the local TV news showed up and asked to interview me and my boss. My boss told my story on the news, and let me know a week later that she got a call every day that week from somebody looking to donate to help these dogs out. Others wanted to adopt the dogs with health conditions, and others wanted us to take in their dogs that they could no longer care for. When I heard this, I called Sloane with the news and Sloane seemed to get just as excited as I was and said we needed to take advantage of the good press and start up a bigger thing. This could be a way out of our jobs at the gas station!

With the newly donated funds, I was able to install kennels for 20 dogs in what had been a granary near the farmhouse. My landlord had no problem with that and even helped put in some insulation and install windows donated by a local building supply store. Between work and taking care of and placing the dogs, I decided to stop taking classes at UVU so I could devote more time to our dog rescue program.

Then things just sort of slowed down. Sure, I continued to get donations at Grab-n-Go, but it was not going to be enough to build on. I talked with Sloane and Sloane said something like the news cycle had moved on and forgotten about me.

Sloane finagled an invitation for us to speak at the Provo Rotary Club's lunch meeting on February 1, 2019. I brought Eddie and Jensen's four remaining dogs (three got placed with good folks with big hearts willing to take in a dog with challenges). I used Eddie to show what a dog with physical impairments could still do and how loving and attentive the other four could be. Sloane mentioned in our presentation that we wanted to help other dogs with special needs. After the meeting, the local Generous Motors dealer came up and offered to help and suggested we use Neighbors Crowdfunding Neighbors (NCN), an online crowdfunding site, to raise funds. Another of the Rotarians who was an accountant suggested we form a non-profit corporation to which donations could be made.

Sloane and I were thrilled that it looked like our dreams were about to come true. On the long drive back, I called Sloane while they were driving back to work and we decided on the name "Rescue Utah's Furry Friends" or "RUFF" for short. When I got home, I fired up my computer to connect to the Utah Department of Commerce's website to complete the documents to form the non-profit corporation. Sloane even managed to get us a website and company email addresses.

Sloane and I realized early on that there were steep fees from most of the Wasatch front to ensure safe arrival of new rescues, so we found a cheap plot of land in Payson to formally start our shelter. We chose to set up the rescue in Payson because it was close enough to Provo and Orem to allow us to work with the local pounds while being cheap enough for us to have a plot big enough for the dogs to run around freely. This was in late 2019. Around this time, my father passed away and left me an inheritance. It wasn't much, but the inheritance, along with some money I saved from my army days, was enough to build a small house on this land which allowed me to live with the dogs. The house was finished in early 2021, and we called this new place the farm. I even took up gardening as a hobby just like when I was a kid.

In between moving to Payson and going full time with RUFF, I took up a job as an assistant manager at a Torta Villa to make ends meet (and to pay off the small amount of debt I had to take on to build my house). I did not really enjoy the work, but it paid the bills. Every day I hoped I could take this rescue idea full time and spend my life doing what I loved: helping dogs.

By the end of May 2021, we had set up the shelter in my backyard, and we were ready to start raising funds with NCN. Our first request for funding was to provide what we estimated we needed to build additional kennels and to feed and provide veterinary care

for the dogs we anticipated rescuing. Well, we exceeded our goal of $20,000 and were contacted by people wanting to volunteer. We also were contacted by humane societies or other rescue operations across the state that recognized the challenges of placing dogs with disabilities and requests from older folks on fixed incomes who could not afford medical care for their pets.

Sloane suggested we should provide funding for some of those requests. Sloane said something about it would be better for us to raise and distribute funds to those asking for help rather than compete with them for donations. Sometimes it would be a “one and done” where we funded the cost of a surgery – usually with a veterinarian we had a relationship with – and others would involve our paying the cost for medications a dog needed that the owner could not afford.

RUFF was a lot of work, and I could not have done it without help from Sloane and others who volunteered. Some, like Sloane, brought know-how to do things on the website or how to reach out to folks to request donations. Others would help with caring for the dogs. Such care would include coming out to the farm and walking, feeding, and watering the dogs as well as just giving them some personal attention. Some volunteers would drive to pick up dogs we were taking in or, best of all, go to visit those who offered to provide a forever home for one of our dogs and if it all checked out, deliver the dog to their new home.

Sadly, some of our dogs would never be placed because their needs were so great. So we just kept and cared for them so they could live out their remaining lives in a good and loving environment. Even worse, some dogs’ needs were too great even for us, and they had to be put down. I remember every dog we have had to turn away.

One of our volunteers came up with the idea of having RUFF shirts made up that we could sell on our website with a cute dog graphic saying “RUFF.” They sold pretty well on the website and to show appreciation for our volunteers, I took some in and had them embroidered with the volunteer’s name and “Volunteer” underneath it. We also had a volunteer and donor recognition pool party in June 2023 which I had catered by the local Torta Villa I worked at. In December 2023, I also hosted a holiday dinner at a local restaurant for some select volunteers.

At the end of 2023, I quit my job at Torta Villa to devote my full time and energy to RUFF. I had to start drawing a salary to replace what I was making at Torta Villa and have the rescue cover the rent on the farm. I figured it was reasonable for me to draw a small salary to cover living expenses as the primary caretaker for all my dogs.

In terms of the RUFF facilities, we started 2023 with kennel facilities for 20 dogs located in my backyard, largely funded by the donations made at the Grab-n-Go. In the spring of 2023, we spent a couple thousand dollars to install an above ground pool to be used by

the dogs for exercise. It was very beneficial for dogs with mobility issues as a volunteer could get into the pool with the dog and allow them to exercise. We obtained a donation of flotation devices for the dogs from a floatation device manufacturer in the area.

In July 2023, we obtained a $10,000 grant from Utah Dogs Inc. to acquire and install a metal pole building on vacant land next to my plot. This allowed us to increase our kennel capacity to 45 dogs. We needed the capacity as we were taking in more dogs, and some were going to have to stay with us.

In December 2023, we received another grant of $70,000 (this time from Dreams for Dogs). We applied to improve our transportation equipment. My old truck was on its last legs at that point. I went to the Generous Motors dealer who originally suggested NCN for crowdfunding; he had recommended I get a GM Visa card to run expenses for RUFF through and get points to be used to acquire a vehicle. I had close to a few thousand dollars in points and was looking to get a used truck only to find out the points only applied to new vehicle purchases. We could, however, use the points for a low mileage demonstration model the dealer had in stock and for which he had a really good year-end close out price. GM was also offering 0% financing for the balance. I thought $93,000 was a lot of money, but with the grant money and GM bucks and no interest on the financed balance RUFF could swing it, so I said yes, but asked for a little time to sign up the paperwork while I sought out some additional donations.

It may look like a bit of an extravagant vehicle to be carrying dogs in, but the G150 Thunder is actually quite good for it with the ability to load a couple small carry kennels in the back seat (one facing each door) and two or three more larger kennels in the cargo area in back. Also, I figure that coming to a meeting with a high buck potential donor in a nicer vehicle than my old rusted out truck would make a better impression. I also figured that saving animals and helping the environment go hand in hand, so I was thrilled to be able to buy an all electric car. Donors would be able to see that RUFF cares about more than just dogs. Even though it was a more expensive option, I believed it would make up the extra cost in more donations.

We were doing well with our appeals for funding through NCN. It seemed the appeals to help specific dogs were the ones that had the best responses, but it also seemed to me that donors did not understand the basic costs of operating RUFF, especially those associated with caring for dogs in what amounted to a hospice program. So, I knew we needed to pursue more significant (big buck) donors. I had some discussions with Sloane about this and Sloane said I needed to cultivate donors by tracking their support and then reaching out to those that were repeat contributors, especially for larger sums.

An example of this would be Robin McCallister. McCallister first donated in the summer of 2023 when we ran a request to fund costs of dental surgery for a dog who had had its

teeth severely damaged in an accident. I believe McCallister funded a good part of the $1,000 we needed to get the dog to and from its home in Kanab to the veterinary dentist in Salt Lake City. The dentist was willing to only charge for staff time and for the medications for the procedure. I sent a personal thank you card to McCallister and enclosed a photo of the dog with the repaired teeth.

McCallister's next support was ongoing funding to cover the cost of insulin for a diabetic dog. I am uncertain, but I believe McCallister made regular monthly payments to us through our donation portal we set up on our website, though it may have been through NCN.

Because of McCallister's regular and generous donations to our cause at RUFF, I personally reached out to them about potentially donating to help support a trip for me to New York City. I told them that it was a networking trip to help potentially connect RUFF to philanthropists beyond the Wasatch front. McCallister agreed with my vision and generously wrote me personally a $4,000 check on December 29, 2023. I used this check to largely cover my expenses for my New York trip.

McCallister was also a contributor to our efforts to rescue dogs following a hurricane in Florida. When our records showed it had been a while since McCallister had provided funds, I arranged to visit McCallister at their home. I was trying to move them from a regular donor into major donor status so it would be easier for us to grow RUFF with funds not tied to specific appeal.

My trip was worth the time. I got a $50,000 donation from McCallister. I think my offer to put a photo of them in our donor hall of fame is what sealed the deal. When I got to my car and looked at the check, I realized it was payable to me and not RUFF. I didn't want to go back inside and ask McCallister to replace it and just put it into the RUFF bank account. I believe this was in January 2024.

I was shocked to later learn that McCallister has accused me of stealing their money. McCallister's donations were made voluntarily.

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

Sure, I get it that spending money for me to fly out to New York in February 2024 may look suspicious, but you need to understand that at the time, I was trying to get RUFF to the next level. I figured attending the Westminster Kennel Club show would allow me access to representatives from dog food companies and others attending the event who would be willing to provide us a lot of support in our efforts to rescue dogs with disabilities. It was such a good show, but I did not talk to anyone about RUFF. I should

have, but I just forgot. The only regret I have was going to see the musical “Lion King;” It was just some wishy-washy artsy dance routine. I should have seen “Hamilton.”

I also get that someone may question why we spent nearly $124,000 on a therapy pool for the dogs in April 2024 when we already had a pool. Well, it is sort of like my going to the Westminster Kennel Club show in New York: I was positioning us to make the RUFF facilities more inviting for larger donors who might come to see what we were doing before they made a more substantial contribution. The new pool was so much more accommodating for socializing around the pool while the dogs were exercising in it. We had received over $110,000 in Q1 2024 after an explosion in our donations, and I figured we could afford it.

I have seen, but do not fully understand Exhibit 2. I am familiar with Exhibits 3, 4, 5, and 11. I prepared Exhibit 6, including the corrections in it and Exhibit 7. Exhibit 9 looks like a screenshot from our website containing pictures of some of the dogs we rescued. Exhibits 8 and 10 look like photographs of the new therapy pool at RUFF and the G150 Thunder RUFF purchased in January 2023.

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

DATED this ***5th*** day of ***December,*** 2025

/s/ STEVIE HOWELL

Stevie Howell

Witness statement of Adrian Donahue

I am Adrian Donahue. 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, corporations, 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 actually employed as an internal fraud investigator for the corporation Neighbors Crowdfunding Neighbors (NCN), which is headquartered here in the San Francisco Bay Area.

I have two higher education degrees. The first is a bachelor's in business administration, which I received from the University of Nevada-Las Vegas. The second is a master's in accounting, from California Polytechnic State University-San Luis Obispo. I am also licensed as a 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 (acquiring and reviewing accounting documentation for mathematical anomalies, interviewing witnesses, and evaluating explanations for why money was spent, moved, or dispersed in a certain way). The purpose of my investigations there was 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 2014 I joined a relatively new startup company in the Bay Area called NCN, as an internal fraud investigator. NCN is now a widely recognized, global for-profit corporation that helps connect individuals in need of financial help with willing donors, through a website portal system on the internet. It is a form of social media where people can create user accounts with a profile picture and an about-page. They may send messages to other users on the platform; they may choose to advertise their history of receiving or giving donations on their profile or they may keep these details hidden from other users. Donations can be open or anonymous. The donations are provided using a special financial interface that partners with credit card and checking account security

apps. I am highly familiar with NCN's operations because I worked for them from 2014 to 2018.

Currently, I work in private practice as a consultant. I have been retained by the defense in this case. They have paid me an agreed-upon sum of $800 per hour of work on this case. To date, I have billed 22 hours of work on this case. I am also charging an additional flat fee of $5,000 to testify at trial as a witness in this case.

NCN Operations

NCN does important work. It's hard to put into words how so many different lives have been positively impacted by its services. People who are in need of expensive medical treatment can ask for help on NCN, as well as people struggling with large debt, such as an underwater home mortgage. Victims of horrible crimes will ask for help with funeral costs and family support, and people with legal cases will ask NCN users for help with funding their attorney fees.

And often, yes, as you're probably aware, the internet is no stranger to helping wounded, sick, mistreated, or un-housed animal pets. Pet-related donations comprised between ten and twenty percent of all NCN donation pages during my time with the company. They are obviously an emotionally attractive donation target for people who see the funding request adverts on other social media sites, which will often show images of very sick or injured animals.

I will be as forthright as I legally can be about this: There have been instances of fraud at NCN before, and some of those cases have involved large sums of money. Not all users who ask for help on the website are actually using the money for the stated cause. I am bound by a non-disclosure agreement with NCN that I signed after I left the company, so I cannot tell you how much fraud I witnessed, but there have been some well publicized examples in the news. Often, these cases have been fairly obvious, and NCN swiftly worked to shut down the account, ban the individual, and do its best to retrieve the donation funds given out by the victims.

My time in the internal fraud unit at NCN involved less actual auditing and more user activity analysis. What I mean by that is my team was mostly in charge of reviewing user accounts (rather than bank accounts) on NCN's online system for allegations of fraud. I would review a user's history on the website, including both their openly visible and their user-hidden history, for anomalies that indicated fraud. Most of my internal fraud reviews were done in response to an official fraud or scammer report that any user on NCN can file as a matter of course when they believe a different user has violated the terms of service of the website or committed a crime.

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

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

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

When we detected a case we believed to be fraudulent, we then had to take two steps: shut down the account and take legal action against the user. This usually meant referring a report to the police. It was not my role at NCN to obtain a copy of a user's financial record of their bank accounts; that's something only a law enforcement organization can receive, by means of a warrant or a subpoena.

The Stevie Howell Case

As I said above, I was retained as an expert witness by Stevie Howell's defense team, due to my expertise in NCN cases. I handled most of this case over the phone with Howell's team, reviewing documents and reports given to them by the prosecution. I did not interview witnesses here. Witness interviews were already completed, and no judge would ever let me, an accountant, tell the jury who is lying or telling the truth. That's not my expertise. My role was specifically to review the accounting information obtained by the prosecution and try to make a determination of whether there was evidence of malfeasance by Stevie Howell through Howell's NCN applications or bank accounts. Thus, my work in this case was spent reviewing the reports and paperwork compiled by Quinn Prescott rather than affidavits of other witnesses in this case.

I will first note that I saw nothing indicating Stevie Howell falsified images or stories about animals in need of help, as was typically the case in fraud cases I discovered at

NCN. Howell was also very consistently asking for help with pet-related donations. It's easy to get lost in the weeds on fraud cases looking at numerical anomalies on the book records, without realizing that simpler evidence on NCN pages tells a different story.

Investigators need to remember that one of the questions is whether Stevie Howell actually lied about these animals and whether they were in need of help. I found no evidence that Quinn Prescott reviewed suggesting that any of these funding requests were faked. Worse, Quinn Prescott actually uncovered evidence that many of these donations were real. In bullet point two of Prescott's affidavit, Prescott notes that Howell's efforts were even recognized in February 2019 by local media.

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

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

You will see this problem over and over again in Quinn Prescott's affidavit. For example, in the analysis section of the report, in bullet point 3, Prescott notes that none of the Rescue Utah Furry Friends (RUFF) donations are tax deductible because Howell failed to file for tax-exempt status with the IRS. But that is exactly the type of thing an amateur person is less likely to know they should do. It is not evidence of financial malfeasance. The same assumption is made with bullet point 9, where Prescott notes Howell failed to purchase liability or property insurance for staff or organization sites--again, another oversight a non-savvy amateur businessperson may commit by accident.

Prescott lists a number of bullet points where Howell received small-sum donations and later withdrew larger cash amounts from the organization's bank account. On or about February 6, 2019, for instance. Howell takes out a check for $30,000 from RUFF and deposits it in a personal account. It's unclear to me why this is so suspicious. Again, less business-savvy users may not realize that they can run into trouble by co-mingling nonprofit or business funds with their personal funds. Just because they share their accounts between their organization and personal lives does not mean they are spending the money on things unrelated to the purpose of the donation.

It's ultimately difficult to judge most of the expenditures the State takes issue within Prescott's report. For instance, on December 21, 2023, it appears a dinner for only two attendees cost $440, but it's possible for a person to benefit their nonprofit by hosting a swanky dinner with an influential individual. Business professionals sometimes spend thousands of dollars on dinners with wealthy clients and donors they are trying to swoon. In another example, Stevie Howell appears to spend about $5,000 on a visit to New York City, but it's unclear for what purpose Howell made this visit or how it may or may not have benefited RUFF. It is also a particularly cheap trip to New York! In a particularly silly example, Prescott criticizes Howell for spending just $123,000 on a swimming pool, even though Howell apparently specifically explained it was for rescued dogs.

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

I am familiar with Exhibit 2, Exhibit 6, Exhibit 7, and the witness statement of Quinn Prescott

DATED this ***19th*** day of ***December***, 2025 /s/ 

Adrian Donahue

Witness statement of Jesse Graves

My name is Jesse Graves and I've worked for the last 35 years as a contractor. I specialize in backyard remodels, driveway reconstructions, foundations, and pool builds. I built the pool and helped redo the backyard of Stevie way back in April 2024.

I've really been in the construction business for my entire life. My dad had a pretty big construction company when I was growing up and he always dragged me along to the site. What kind of person lets a 6-year-old wield a hammer? Anyways. When I graduated high school, I figured I would just join my dad's business and take over once he was too old to properly cement. But wouldn't ya know it, my older brother had the exact same idea. Not that I don't love my brother, but we're like oil and water. Or cats and dogs, more appropriately for this. And I did not want to spend the next 50 years of my life stuck under his thumb. I mean, jeez, he only wanted to focus on pouring cement for the new builds and never expand to anything else. Where's the fun in that? We worked together for a few years, but I decided I needed to do my own thing.

I know construction isn't really a job you technically "need" a degree for, especially since I've had so many years of experience, but I knew basically nothing about finances, so I figured it could be useful if I'm running my own company. I went to Utah State and graduated from their construction management program in 1993 with a minor in business. I didn't know so much went into the behind the scenes stuff at my dad's office. It was good to know, but I was excited to get back to building things full-time. It makes me feel useful. My dad helped me get set up with my own LLC after graduation. My name is Graves legally. Jesse Graves. But let's be honest—nobody wants someone named Graves building their foundation. So it's Jesse Carpenter on the van. For this, though, let's just go by Graves. Legally it makes things easier.

I moved down to Utah Valley—specifically Springville—because there was so much growth. It seemed like everyone needed a new driveway or a revamped backyard or leveling of some sort. And Utah Valley is a great market because you can get up to Salt Lake and down to Santaquin pretty quickly. Business was booming and my crew was kept pretty busy. Always working on something new.

Stevie originally found me through an ad on Facebook and reached out. They initially told me a little bit about the Furry Rescue Utah Friends thingy and we exchanged a few messages. They forwarded me a link to their website and I scrolled through the dogs. There were some cute ones on there for sure. Stevie gave me some general details about the project, but I told them I would swing by in person the following week to give them an estimate.

I went to Stevie's "farm" in Payson and the backyard was a pretty dismal place. Shoddy brickwork everywhere and it reeked of dog. I was hoping to catch a glimpse of some of

the dogs I had seen on the website, but Stevie told me they were out on a walk. Stevie was really adamant about the layout of the renovation and the pool. It needed to have a gradual slope and stairs for the dogs to easily enter and exit the pool. It also needed a slide and a place to jump into, something about helping with the dogs balance? I don't remember the specific reasons, only that it needed to be there. I wrote down all the necessities in my notebook, I assume you have access to that. We also talked about redoing the surrounding brick and grass area, so it would give the dogs a place to hang out. I gave Stevie an estimate for a full backyard redo including the nice pool and yard space for the dogs. It came out to be around $115,000 for the full thing. You might think "Oh that's so expensive," yeah, right. Have you seen the price of materials these days? There was no way I was making that pool with all those mods for anything cheaper—I wouldn't even break even! I also have guys on the crew to pay. $115,000 is pretty reasonable for something like that.

Stevie seemed kind of skeptical on that price and asked for a discount. I'm kind of a stickler for not doing discounts because if you make any exceptions, you make *all* exceptions, you know? I told them they could get another quote, but I am one of the cheapest in the area for the quality I give. It seemed like they didn't want to go through that hassle, especially since they loved the design I had created. I guess my expertise was a determining factor. Stevie told me that they were doing things on a budget and trying to save the majority of the funds for the dog food, kennels, and medical treatments. That one got me. I'm not heartless, and who doesn't want to help cute dogs? So I decided to give them a 5% discount, as long as they posted the finished product on their website with credit and a link to my company. Stevie readily agreed. We shook on it and I sent over a contract later that afternoon, which they signed and got back to me before EOD.

The next week, I went over to select and solidify materials with Stevie. They had said they wanted to do things on a budget, so I made sure to bring some cheaper vinyl samples as well as the more expensive concrete, fiberglass, and finishing options. Stevie and I met in the backyard and I was greeted by a couple of dogs. I hadn't seen these ones on the website. They were pretty old but seemed healthy. I asked Stevie if these two dogs were up for adoption, but Stevie said those were his personal dogs and sent them inside so we wouldn't be bothered by any barking. I laid out all the samples and began to run through the cost options. As I was explaining the pros and cons of vinyl (cheaper, must be replaced more often, etc.) Stevie said they didn't really care. They told me "I just want the best. For the dogs, y'know? What is going to last longest and look the best?"

I said that concrete was probably the all-around best option, despite costing more upfront. We also decided to do a saltwater pool instead of chlorine because it would be healthier for the dogs, even though it was more expensive. Stevie didn't love the look of

the concrete, though, so we opted to do a marble overlay so the pool sparkled a little more and then continue the overlay over the surrounding brick so it looked cohesive. Then we would have some trim, a few rock details, and the rest of the yard would be grass. It was honestly a beautiful design, though I didn't see why the dogs needed all that. My dog growing up had a pile of dirt and he seemed well enough. I guess that's why I'm the contractor and not the dog specialist.

I double and triple checked with Stevie on the price. Like I said, materials are not cheap and neither is the labor and skill that installing them requires. It was going to come out to be $130,000 with the new selected materials and set up. Stevie just told me that was fine as long as we still did the 5% discount, making the total around $123,500. I didn't know there was so much money in rescuing dogs, but it didn't seem to be a problem. There were always clean kennels and piles of dog food when we went over. Stevie told me they would be out of town for a couple of days a month later, something about the dogs, I don't know I wasn't paying attention, and we could start the construction then. That was the last time we talked before the reno.

We got started on the job a couple weeks later on April 20th. It was just me and a few of my guys. Like I said, Stevie wasn't at the property when we started, but we had cleared all the details and they told us the code to get in the back gate. I guess they had gotten the new kennels, because there were about 10 stacked in the side yard. They looked pretty new. There weren't any dogs in the backyard (I assumed because Stevie was out of town) but honestly, that was better for us because I did NOT want to be jackhammering and shoveling brick with dogs barking for 8 hours.

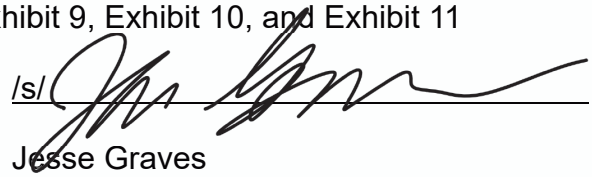
I'll spare you the gory details of the reno, but everything went pretty much according to plan. Concrete went in fine, none of the marble broke, and we got it done in the time agreed upon. Stevie got back from their trip a few days before we finished, but we just saw their truck and heard a few dogs; they didn't come to the backyard, I'm sure to avoid the dust and construction area. The day we finished the renovation, I talked to Stevie again to make sure their check cleared. They were getting two of their dogs, the ones I saw previously, out of the back of the truck: a really nice Thunder. I said to them "Woah that's a really good lookin' truck. Do the dogs like it too?" Stevie laughed and said "Yeah, it's really nice to have a car I can transport the dogs in without worrying about getting dirty seats." I asked where they were getting back from, and Stevie told me they were at the vet getting a checkup. Stevie said they tend to make at least 3 trips to the vet a week, just with all the needs that various dogs have.

Stevie put the dogs in the house and came back with me. I gave him a general tour of the yard and showed him how to modify the salt chlorine content in the pool. Like I said, this was my first dog-specialized pool, so I wasn't sure the water levels that they wanted. Stevie said he would talk to the vet to see what would help the dogs the most. I

showed Stevie around the rest of the yard, where we made space for the kennels, grass area, bathroom area, and marbled concrete. They said it looked great and would contact me if they needed anything else.

I honestly didn't think any more of the project because we had no financial issues. I'm kind of surprised I was asked to testify today. Everything we did seemed to be in the best interest of FURR, or whatever cutesy name that charity has. Stevie seems like a standup person who cares a lot about their pets and only wants the best for those dogs.

I am familiar with Exhibit 5, Exhibit 8, Exhibit 9, Exhibit 10, and Exhibit 11

DATED this *17th* day of *November*, 2025 /s/ 

Jesse Graves

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Exhibits

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IN THE THIRD DISTRICT COURT
STATE OF UTAH

STATE OF UTAH, **Plaintiff,** **v.** **STEVIE HOWELL** 1298 Ranch Road Payson, UT 84651 DOB: 3/11/1990, **Defendant.**	**JOINT EXHIBIT LIST** Case No. 251110980 Judge A.B. Reinhold

The parties, through counsel, present the following Exhibit List for trial.

Under stipulation 3, the parties agree that the exhibits are authentic and agree to refer to each exhibit as marked. Unless otherwise agreed upon, the parties do not stipulate to the admissibility of any exhibits.

Exhibit 1	Curriculum Vitae of Quinn Prescott
Exhibit 2	Quinn Prescott's investigation notes
Exhibit 3	Utah tax exempt organization search
Exhibit 4	Articles of incorporation for RUFF
Exhibit 5	Contract between Stevie Howell and Jesse Graves
Exhibit 6	RUFF balance sheet
Exhibit 7	Rescue Utah's Furry Friends Revenue and Expenses
Exhibit 8	Photograph of Stevie Howell's pool **And** Sketches of scope of work drawn by Jesse Graves before commencement of work.
Exhibit 9	Screenshot of the RUFF website
Exhibit 10	Photograph of Stevie Howells G150 Thunder
Exhibit 11	Invoice from Jesse Carpenter Construction for pool

Curriculum Vitae

Quinn Prescott, M.P.S., CFA

Forensic & Financial Crimes Analyst – Lake County, Utah
Email: q.prescott@lakecounty.gov Phone: (801) 867–5309

Professional Profile

Born in Paris, Texas, I developed a lifelong interest in science and numbers during high school, taking every math course available and exploring economics from personal finance to global markets. A fascination with forensic science led me to merge my quantitative skills with investigative work. I now serve as the Forensic & Financial Crimes Analyst for Lake County, Utah, combining advanced training in fraud management, economic crimes, and forensic accounting to investigate and testify in complex financial cases.

Education

- **Master of Professional Science (M.P.S.), Fraud Management & Economic Crimes**, Boise State University – 2013
  Thesis: "Patterns of Asset Diversion in Small Business Embezzlement Cases"
- **Bachelor of Science (B.S.), Mathematics** (Minors in Accounting & Criminal Justice), Utah State University – 2010
  Graduated *summa cum laude*, Presidential Full-Tuition Scholar
- **Law Enforcement Officer Certification**, Utah Peace Officer Standards & Training (POST) – 2013
- **Certified Forensic Analyst (CFA)**, University of Utah – 2015
  Specialization in Government & Forensic Accounting

Certifications

- Certified Fraud Examiner (CFE) – Association of Certified Fraud Examiners, 2016
- Certified Forensic Interviewer (CFI) – International Association of Interviewers, 2017
- Digital Forensics Certified Practitioner (DFCP) – 2018
- Forensic Document Examination Specialist – AAFS, 2019
- Anti-Money Laundering Certified Associate (AMLCA) – 2020

Professional Experience

Forensic & Financial Crimes Analyst – Lake County, Utah 2015 – Present

- Lead financial investigations into fraud, embezzlement, and asset concealment.
- Analyze complex records for patterns of illicit activity, tracing transactions through multiple jurisdictions.
- Prepare expert reports and testify in state and federal courts.
- Advise law enforcement on evidence collection for financial crime cases.

Forensic Accountant – Utah AG's Office, Criminal Division 2013 – 2015

- Investigated high-profile white-collar crimes, including Ponzi schemes and public corruption.
- Provided courtroom testimony, trial exhibits, and in-depth forensic accounting analysis.
- Contributed to a multi-jurisdictional case that recovered $2.8M in stolen funds.

Intern, Judicial Support Division – Cache County Judicial Office 2010 – 2011

- Assisted in reviewing and organizing criminal case files.
- Supported trial preparation and maintained accurate court scheduling records.

Professional Affiliations

- American Academy of Forensic Sciences (AAFS) – Member, Forensic Document Examination Consensus Body
- Association of Certified Fraud Examiners (ACFE) – Member
- International Association of Financial Crimes Investigators (IAFCI) – Member
- Utah Association of Criminal Justice Professionals – Member

Publications

- Prescott, Q. (2022). "Tracing the Paper Trail: Asset Recovery in Complex Fraud Cases." *Journal of Forensic Accounting & Criminology.*
- Prescott, Q. (2020). "Beyond the Balance Sheet: Behavioral Indicators of Financial Crime." *FraudWatch Blog.*
- Prescott, Q. (2018). "The Role of Forensic Accounting in Digital Asset Investigations." *Economic Crimes Quarterly.*

Expert Witness Experience

Qualified as an expert witness in **Utah District Court**, **Idaho State Court**, and **U.S. District Court (District of Utah)**. Testified in 14 criminal trials and 9 civil proceedings involving forensic financial analysis, document authentication, and fraud investigation.

Selected Case Experience (Redacted):

- State v. [REDACTED] – Embezzlement investigation in a municipal office.
- U.S. v. [REDACTED] – Money laundering analysis involving shell corporations.
- State v. [REDACTED] – Forensic document examination in a contract forgery dispute.
- U.S. v. [REDACTED] – Cryptocurrency tracing linked to wire fraud.
- State v. [REDACTED] – Fraudulent grant application investigation involving public funds.

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Exhibit 2

Quinn Prescott Investigation Notes: RUFF Revenue & Expenses July 1 2023 - June 30 2024	
L: Appears Legitimate	
Q: Questionable, unable to verify, no documentation, explanation unsubstantiated, etc.	
Income	**Notes**
Donations	Q: November 2023, $1,000 donation from Robin Mcallister (RM) for insulin shots for Peanut (dog). Unable to verify Peanut exists. December 2023, $4,000 solicitation for business trip to NYC from RM. $5,000 donation from RM for hurricane relief. Unable to verify funds were spent on hurricane relief. Jan 2024, $50,000 donation from RM. March 2024, $30,000 donation from someone unwilling to be interviewed.
Grants	L: All grants appear consistent.
Other Income	L: Merchandise sales.
Expense	Notes
Salaries & Wages	L: Howell cites increased work hours associated with taking care of more dogs. Howell quit job at Torta Villa resulting in needing a higher salary starting Q1 2024.
Benefits	L: Owner on marketplace insurance plan for $500 a month.
Bank, NCN, credit card fees	L: NCN assesses fees on donations, bank charges monthly fees. NCN representative verified fee amount.
Dog Medical care (Vet bills)	L
Communication	L
Equipment	L: July 2023, $5400 for kennel repairs and renovation. $250 monthly equipment costs. Q: $99,000 for G150 Thunder, above MSRP. Howell cites need to transport dogs. $123,500 for “therapy pool” for dogs. Howel has not provided sufficient justification.
Insurance	Q: No property or liability insurance.
Marketing/Website	L
Meals & entertainment	Q: No records were kept for $500 charge in February 2024.

Milage & local travel	Q: No documentation or logs kept.
Office supplies & software	L: Laptops, accessories; monthly subscription fees.
Postage & Delivery	L
Printing & Reproduction	L: Brochures, misc. printing.
Project supplies (pet food)	L: Monthly deliveries of dog food.
Professional Development	Q: Two tickets to Westminster Kennel Club Show - business purpose not substantiated (no workshop attendance, etc.). April professional development not verified.
Property costs	L: Property use fees and taxes; utilities.
Travel	Q: NYC trip. Hotel: $3913.87, meals: $1232.13, 2 tickets to Lion King, $498.00. Other: $75.00. Well above market rate for Hotel and meals. Business purpose of high meal cost and hotel not substantiated. Business purpose of Lion King not substantiated. Purpose of travel expense in April not verified. Records for other expenditures ($75.00) not verified.
Volunteer Recruitment	Q: $440 dinner for 2, Howel claimed volunteer appreciation dinner, Dec 21, 2023.

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Results for Tax Exempt Organization Search

Select Database

Search All

Search By

Organization Name

Search Term

Rescue Utah's Furry Friends

City

Enter City

State

UT

Country

United States

Search

Reset

Search Tips

Your search did not return any results. Please try again.

Need Help? See Search Tips for guidance on effective searching, search criteria and logic, and selecting search terms

Results for Tax Exempt Organization Search

Select Database

Search All

Search By

Organization Name

Search Term

RUFF

City

Enter City

State

UT

Country

United States

Search

Reset

Search Tips

Your search did not return any results. Please try again.

Need Help? See Search Tips for guidance on effective searching, search criteria and logic, and selecting search terms

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Exhibit 4

ARTICLES OF INCORPORATION

OF

RUFF (Rescue Utah's Furry Friends)

We, the undersigned natural persons, all being eighteen (18) years of age or older, acting as incorporators under the Utah Revised Nonprofit Corporation Act (Utah Code § 16-6a-101 et seq.), adopt the following Articles of Incorporation:

Article I NAME

The name of the corporation is **RUFF (Rescue Utah's Furry Friends)**.

Article II DURATION

The period of duration of this corporation is **perpetual**.

Article III PURPOSE

The corporation is organized exclusively for charitable and educational purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code (the "Code"), including without limitation:

1. Rescuing, rehabilitating, and rehoming dogs; operating shelter, foster, and adoption programs; providing spay/neuter, vaccination, and microchipping assistance; and conducting community education on responsible pet care.
2. Receiving and administering funds for the foregoing purposes; soliciting and accepting donations; acquiring, holding, and disposing of real and personal property; and entering into contracts in furtherance of corporate purposes.
3. Engaging in any and all other lawful activities consistent with Section 501(c)(3) of the Code and the Utah Revised Nonprofit Corporation Act (Utah Code § 16-6a-101 et seq.).

Required 501(c)(3) provisions.

- No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to, its members, directors, officers, or other private persons, except for reasonable compensation for services rendered and distributions furthering the purposes herein.

- No substantial part of the activities of the corporation shall be the carrying on of propaganda or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements), any political campaign on behalf of, or in opposition to, any candidate for public office.
- Notwithstanding any other provision of these Articles, the corporation shall not carry on any activities not permitted to be carried on by a corporation exempt from federal income tax under Section 501(c)(3) of the Code, or by a corporation's contributions to which are deductible under Section 170(c)(2) of the Code.

Article IV MEMBERS / STOCK

The corporation shall have **no members** and shall issue **no stock**. No person shall be personally liable for the debts or obligations of the corporation.

Article V BYLAWS

The bylaws shall provide for the regulation and management of the internal affairs of the corporation and shall not be inconsistent with law or these Articles.

Article VI DIRECTORS

The business and affairs of the corporation shall be managed by or under the direction of a Board of Directors consisting of **not fewer than two (2)** directors, with the exact number to be fixed by the bylaws or by resolution of the Board. **Initial directors shall be appointed at the organizational meeting** in accordance with the bylaws and need not be named in these Articles.

Article VII INCORPORATORS

Stevie Howell
1298 Ranch Road, Payson, Utah 84651

Sloane Sanderson
210 Quail Avenue, Provo, Utah 84604

Article VIII REGISTERED OFFICE AND REGISTERED AGENT

The street address of the corporation's initial registered office is:

1298 Ranch Road, Payson, Utah 84651

The name of the corporation's initial registered agent at such address is **Stevie Howell**.

Registered Agent Acceptance.
I, Stevie Howell, hereby acknowledge and accept appointment as registered agent for RUFF (Rescue Utah's Furry Friends).

STEVIE HOWELL

Stevie Howell

Article IX PRINCIPAL PLACE OF BUSINESS

The principal place of business of the corporation is:

1298 Ranch Road, Payson, Utah 84651

The corporation may conduct activities throughout the State of Utah, other states, and internationally as determined by the Board of Directors.

Article X DISTRIBUTIONS / PRIVATE INUREMENT / POLITICAL ACTIVITY

No part of the net earnings of the corporation shall inure to the benefit of any private individual, except as permitted in Article III. The restrictions on lobbying and political campaign activity stated in Article III apply in full and are incorporated herein by reference.

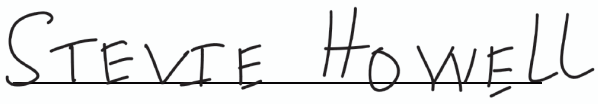
Article XI DISSOLUTION

Upon the dissolution of the corporation, assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not so disposed of shall be disposed of by a court of competent jurisdiction of the county in which the principal office of the corporation is then located, exclusively for such purposes

or to such organization(s) as said court shall determine, which are organized and operated exclusively for such purposes.

Execution

IN WITNESS WHEREOF, the undersigned incorporators have executed these Articles of Incorporation this **first** day of **February**, **2019**, and state that they have read the foregoing and that the same is true to the best of their knowledge and belief.



Stevie Howell, Incorporator
1298 Ranch Road, Payson, Utah 84651



Sloane Sanderson, Incorporator
210 Quail Avenue, Provo, Utah 84604

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Exhibit 5

JESSE CARPENTER CONSTRUCTION

This agreement is made on **April 1, 2024** between **Jesse Graves, who does business as Jesse Carpenter** (the "Contractor"), and **Stevie Howell** (the "Owner"). The work is for a pool to be built at 1298 Ranch Road, Payson, Utah 84651

The Parties agree to the following terms:

1. **Work to be Done**. Contractor will build a concrete saltwater pool with a marble overlay, carry the marble over nearby brick so it matches, add trim and rock details, and put grass in around the pool.
2. **Price.** The total price for the job is **$123,500**, which reflects a 5% discount from the base total price of $130,000. Half the total price **($61,750)** is due upon signing. The remaining amount ($61,750) is due upon completion.
3. **Photo Release.** Contractor may use any photos of the finished pool and yard for advertising purposes.
4. **Timing**. Work will start around **April 20, 2024** and should be done in about 60 days, depending on weather and other conditions.
5. **Access.** Owner will make sure the crew can get into the yard and that dogs will not interfere with work.
6. **Changes.** Any changes to the plan will be written down and may change the cost.
7. **Warranty.** Contractor will stand behind the work and fix any problems with workmanship for one year after completion.

Signatures:

Jesse Graves (d/b/a/ Jesse Carpenter)
Contractor

STEVIE HOWELL

Stevie Howell
Owner

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Exhibit 6

RUFF Balance Sheet

	Prior Year	Current Year
Asset Type	7/1/2022 - 6/30/2023	7/1/2023 - 6/30/2024
Current Assets (cash)	$ 2,3113.00	$ 2,8087.00
Fixed Assets (Shed, kennel, etc.)	$ 4,000.00	$ 253,020.00
Total Assets	$ 63113.00	$ 263,107.00
Current Liabilities	$ 3,000.00	$ 11,780.00
Long-Term Liabilities	$ -	$ 4,976.00
Total Liabilities	$ 3,000.00	$ 16,756.00
Total Net Worth	$ 3,313.00	$ 246,351.00

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Exhibit 7

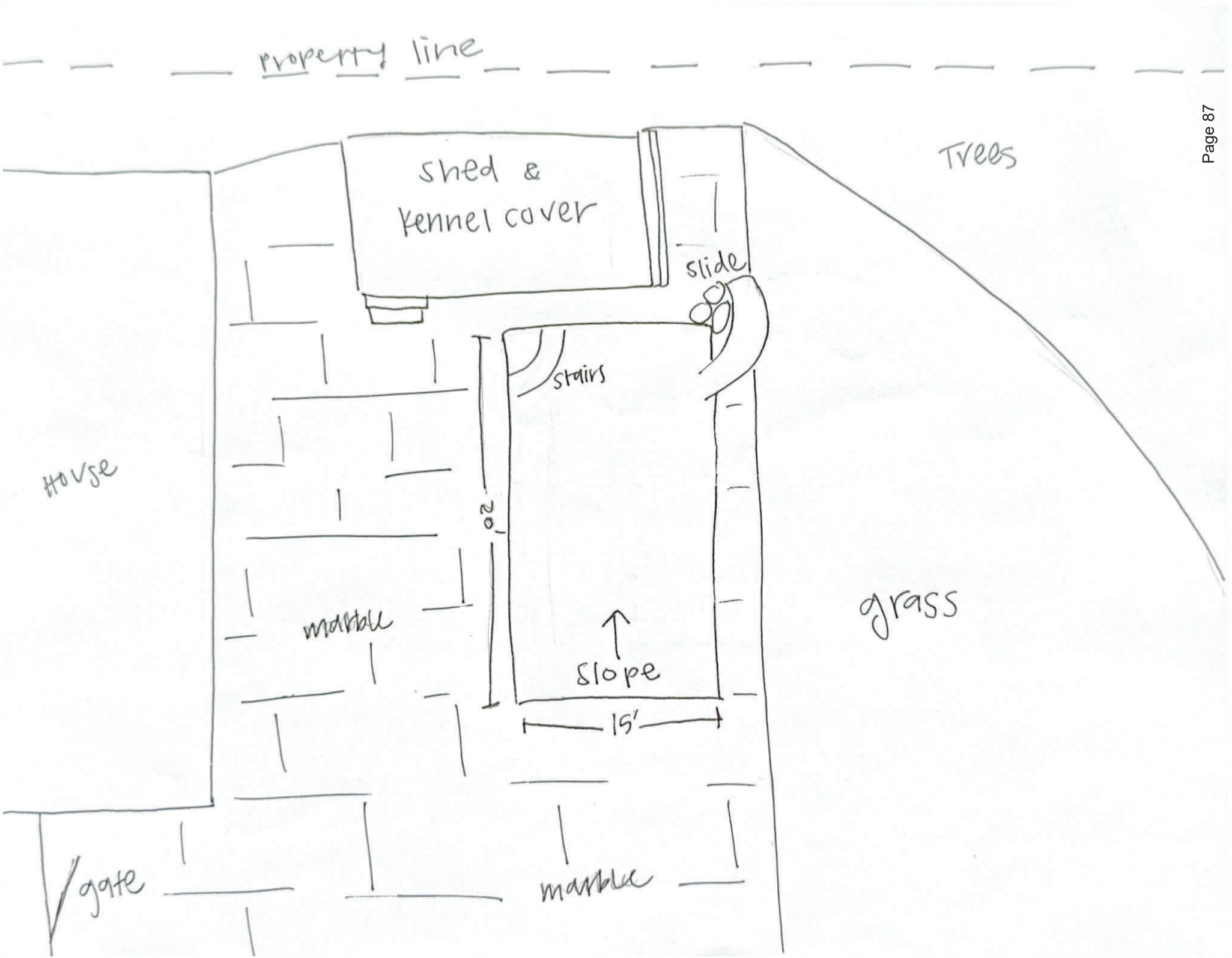
Rescue Utah's Furry Friends Revenue and Expenses | July 1 2023 - June 30 2024

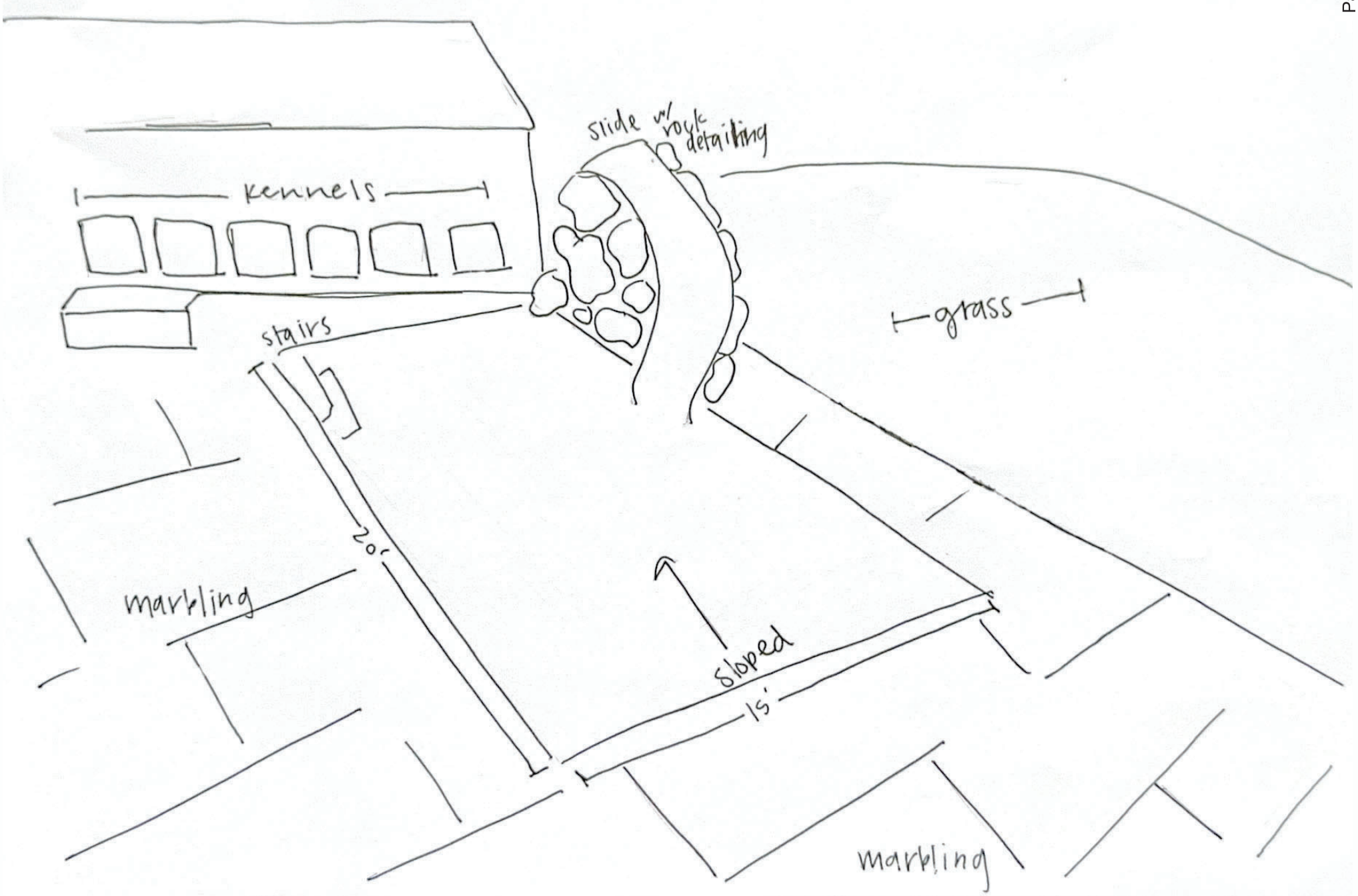
	JUL	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	TOTAL
REVENUE													
Donations	$ 4,400	$ 6,500	$ 3,300	$ 8,900	$ 11,050	$ 17,600	$ 61,300	$ 23,560	$ 58,790	$ 32,480	$ 30,550	$ 28,150	$ 286,580
Grants	$ 10,000	$ -	$ -	$ -	$ -	$ 70,000	$ -	$ -	$ -	$ -	-	$ -	$ 80,000
Other Income	$ 125	$ 200	$ 173	$ 223	$ 124	$ 100	$ 330	$ 290	$ 300	$ 250	$ 344	$ 422	$ 2,881
CASH REVENUE	$ 14,525	$ 6,700	$ 3,473	$ 9,123	$ 11,174	$ 87,700	$ 61,630	$ 23,850	$ 59,090	$ 32,730	$ 30,894	$ 28,572	$ 369,461
IN-KIND DONATION	$ 300	$ 300	$ 300	$ 300	$ 300	$ 300	$ 300	$ 400	$ 400	$ 400	$ 400	$ 500	$ 4,200
TOTAL REVENUE	$ 14,825	$ 7,000	$ 3,773	$ 9,423	$ 11,474	$ 88,000	$ 61,930	$ 24,250	$ 59,490	$ 33,130	$ 31,294	$ 29,072	$ 373,661
EXPENSES													
Salaries & wages	$ 2,500	$ 2,500	$ 2,500	$ 2,500	$ 2,500	$ 2,500	$ 4,000	$ 4,000	$ 4,000	$ 4,000	$ 4,000	$ 4,000	$ 39,000
Benefits (healthcare for owner)	$ 500	$ 500	$ 500	$ 500	$ 500	$ 500	$ 500	$ 500	$ 500	$ 500	$ 500	$ 500	$ 6,000
Bank, NCN, credit card fees	$ 350	$ 350	$ 350	$ 350	$ 350	$ 350	$ 350	$ 350	$ 350	$ 350	$ 350	$ 350	$ 4,200
Dog medical care (Vet bills)	$ 1,000	$ 2,000	$ 3,500	$ 3,400	$ 1,959	$ 38	$ 2,000	$ 1,500	$ 2,000	$ 2,000	$ 2,000	$ 4,000	$ 25,397
Communication (phone, internet)	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 600
Equipment	$ 5,400	$ 250	$ 250	$ 250	$ 250	$ 250	$ 99,250	$ 250	$ 250	$ 123,750	$ 250	$ 250	$ 230,650
Insurance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Marketing/Website & Social media ads	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 75	$ 75	$ 75	$ 75	$ 75	$ 725
Meals & Entertainment	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 500	$ -	$ -	$ -	$ -	$ 500
Mileage & local travel	$ 30	$ 30	$ 30	$ 25	$ 20	$ 30	$ 50	$ 48	$ 77	$ 23	$ 20	$ 30	$ 413
Office supplies & Software	$ 2,310	$ 10	$ 5	$ 15	$ 33	$ -	$ -	$ -	$ 20	$ -	$ -	$ -	$ 2,393
Postage & Delivery	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Printing & Reproduction	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 300
Project Supplies (pet food)	$ 700	$ 700	$ 750	$ 800	$ 800	$ 800	$ 1,000	$ 1,000	$ 1,000	$ 1,200	$ 1,200	$ 1,350	$ 11,300
Professional Development	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 300	$ -	$ 600	$ -	$ -	$ 900
Property costs	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 1,150	$ 13,800
Travel	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 5,719	$ -	$ 2,350	$ -	$ -	$ 8,069
Volunteer Recruitment & Retention	$ -	$ -	$ -	$ -	$ -	$ 440	$ -	$ -	$ -	$ 3,000	$ -	$ -	$ 3,440
TOTAL EXPENSE	$ 14,065	$ 7,615	$ 9,160	$ 9,115	$ 7,687	$ 6,183	$ 108,425	$ 15,467	$ 9,497	$ 139,073	$ 9,620	$ 11,780	$ 347,687
REVENUE OVER (UNDER) EXPENSE	$ 760	$ (615)	$ (5,387)	$ 308	$ 3,787	$ 81,817	$ (46,495)	$ 8,783	$ 49,993	$ (105,943)	$ 21,674	$ 17,292	$ 25,974

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Exhibit 8




property line
shed &
kennel cover
Trees
slide
stairs
House
20'
marble
grass
slope
15'
gate
marble


kennels
slide w/ rock detailing
grass
stairs
20'
marbling
sloped
15'
marbling

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Exhibit 9

Rescue Utah Furry Friends

Donate Adopt Our Story The Farm Contact

At Rescue Utah's Furry Friends (R.U.F.F.), we care for those who cannot care for themselves. We rescue dogs from kill shelters or unsafe homes and provide them with much needed care and treatment.

Browse through our current furry friends to see if one is right for *your* home, or donate to help with one of their treatments!

We are grateful for any contribution, however small!

DONATE HERE



Vanilla Wafer

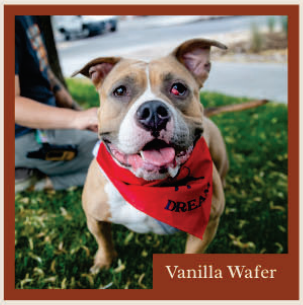


Ruby

See all current dogs

Available Dogs

Donate Adopt Our Story The Farm Contact



Vanilla Wafer



Bart



Pabu



Ruby



Gia



Silas



Gustopher

VIEW MORE

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Exhibit 10



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Exhibit 11

JESSE CARPENTER CONSTRUCTION

Jesse Carpenter Construction, LLC
1324 Roseville Lane
Springville, Utah 84663
(801) 867-5309
management@carpenterconstruction.com

Invoice Number: 2024-0415
Date Issued: 04/01/2024
Due Date: Upon Completion, 06/1/2024

Bill To:
Stevie Howell
1298 Ranch Road
Payson, Utah 84651
ruffdogshelter@gmail.com

Project: Backyard Redo
Full backyard redesign including demolition, excavation, pool installation (20x15), deck, landscaping, lighting, irrigation.

Description	Qty	Unit Price	Total
Site prep & demolition	Lump	$8,500	$8,500
Excavation & grading	Lump	$12,000	$12,000
Custom pool construction (20x15, slope, stairs, rounded	Lump	$60,000	$60,000
Pool slide (curved with install)	1	$6,500	$6,500
Patio/deck materials (stone pavers + framing)	700 sq ft	$35/sq ft	$24,500
Patio/deck labor	Lump	$7,500	$7,500
Landcaping (plants, sod, edging, mulch)	Lump	$6,000	$6,000
Irrigation & lighting system	Lump	$5,000	$5,000
Cleanup & haul-away	Lump	$0	$0
		Subtotal:	$130,000
		Discount (5%):	-$6,500
		Total Due:	$123,500

Payment Terms
- 50% deposit due upon signing ($61,750).
- Remaining balance due upon completion.
- Accepted payment methods: Cash, Check Credit, ACH

Notes
- All permits and inspections included in pricing.
- Warranty: 1-year workmanship warranty on construction & landscaping.
- This estimate is valid for 30 days.

Errata

State v. Howell

Final version

1. Page 5, Count II, and page 6, statement 5; the date September 3, 2023 should instead be the date December 29, 2023.

2. Page 18, line 1 of stipulation 1 should instead read "All of the transactions between Rescue Utah's Furry Friends ("RUFF")".

3. Page 24, last line should instead read "$5,000. If the prosecution has met every element of this claim with".

4. Page 31, line 116 should instead read "recognized some transactions from New York because I've had clients out there. I"

5. Page 33, line 33 of Quinn Prescott's statement should instead read "I became involved with the Stevie Howell case in April 2025 after receiving a call".

6. Page 36, line 117; the date February 2022 should instead be February 2019.

7. Page 36, line 118; the date March 1 2023 should instead be March 30 2023.

8. Page 36, line 119; the date June 2018 should instead be Mar 2023.

9. Page 1 of Exhibit 2; the block of text that contains: ". . . insulin shots for Gustopher (dog). Unable to verify Gustopher exists. . . ." should instead read ". . . insulin shots for Peanut (dog). Unable to verify Peanut exists. . . ."

10. Page 2 of Exhibit 2; the words "Hotel: $3213.87," should instead read "Hotel: $3913.87"