

JOHN W. HUBER, United States Attorney (#7226)
JOHN K. MANGUM, Assistant United States Attorney (#2072)
185 South State Street, Suite 300
Salt Lake City, Utah 84111
Telephone: (801) 524-5682
Email: john.mangum@usdoj.gov

ERIN HEALY GALLAGHER, *pro hac vice*
DC Bar No. 985670, erin.healygallagher@usdoj.gov
ERIN R. HINES, *pro hac vice*
FL Bar No. 44175, erin.r.hines@usdoj.gov
CHRISTOPHER R. MORAN, *pro hac vice*
NY Bar No. 5033832, christopher.r.moran@usdoj.gov
Trial Attorneys, Tax Division
U.S. Department of Justice
P.O. Box 7238
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 353-2452

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAPOWER-3, LLC, INTERNATIONAL
AUTOMATED SYSTEMS, INC., LTB1,
LLC, R. GREGORY SHEPARD,
NELDON JOHNSON, and ROGER
FREEBORN,

Defendants.

Civil No. 2:15-cv-00828 DN

**UNITED STATES' EXHIBIT LIST FOR
ITS RESPONSE TO THE MOTION TO
QUASH SUBPOENAS (ECF DOC. 84)**

Judge David Nuffer
Magistrate Judge Brooke C. Wells

Pl. Ex. Identifier	Description
A	Email correspondence from Gregory Shepard produced by a third-party customer dated February 23, 2012
B	Email correspondence from Gregory Shepard produced by a third-party customer dated January 23, 2014
C	Excerpts from the Deposition of Frank F. Lunn
D	Excerpts from the Deposition of Brian Zeleznik
E	Excerpts from the Deposition of Lynette L. Williams
F	Excerpts from the Deposition of Preston F. Olsen
G	Email correspondence from Gregory Shepard produced by a third-party customer dated May 4, 2012
H	Pl. U.S.'s Notice of Intent to Subpoena Docs. dated July 21, 2016
I	Email correspondence from Gregory Shepard produced by a third-party customer dated July 19, 2012
J	Excerpts from Gregory Shepard's Response to United States' First Requests for the Production of Documents to Defendant R. Gregory Shepard dated June 17, 2016
K	Email correspondence from Gregory Shepard produced by a third-party customer dated February 25, 2014
L	Excerpts from the Deposition of Robert Rowbotham
M	Flyer for "Solar Energy Celebration"
N	Email correspondence from Gregory Shepard produced by a third-party customer dated October 30, 2015
O	Excerpt from email correspondence from Gregory Shepard produced by a third-party customer dated October 22, 2015
P	Email correspondence from Gregory Shepard produced by a third-party customer dated July 17, 2015
4	Printout of www.rapower3.com: "RaPower3 Technology" dated March 2, 2015

Pl. Ex. Identifier	Description
16	“New Solar Breakthrough May Compete with Gas” downloaded from prior version of www.rapower3.com
17	“IAUS Technical Overview” downloaded from prior version of www.rapower3.com
21	Printout of www.rapower3.com: “Site Tours” dated March 2, 2015
42	“RaPower3 Member Office” printout from Frank F. Lunn dated December 30, 2011
114	Email correspondence from Gregory Shepard produced by a third-party customer dated June 30, 2012
154	Email correspondence produced by Preston F. Olsen

Dated: September 2, 2016

Respectfully submitted,

/s/ Erin Healy Gallagher

ERIN HEALY GALLAGHER

DC Bar No. 985760

Email: erin.healygallagher@usdoj.gov

Telephone: (202) 353-2452

ERIN R. HINES

FL Bar No. 44175

Email: erin.r.hines@usdoj.gov

Telephone: (202) 514-6619

CHRISTOPHER R. MORAN

New York Bar No. 5033832

Email: christopher.r.moran@usdoj.gov

Telephone: (202) 307-0834

Trial Attorneys, Tax Division

U.S. Department of Justice

P.O. Box 7238

Ben Franklin Station

Washington, D.C. 20044

FAX: (202) 514-6770

**ATTORNEYS FOR THE
UNITED STATES**

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2016, the foregoing document was electronically filed with the Clerk of the Court through the CM/ECF system, which sent notice of the electronic filing to the following:

Justin D. Heideman
HEIDEMAN & ASSOCIATES
2696 North University Avenue, Suite 180
Provo, Utah 84604
jheideman@heidlaw.com
ATTORNEY FOR RAPOWER-3, LLC,
INTERNATIONAL AUTOMATED SYSTEMS, INC.,
LTB1, LLC, and NELDON JOHNSON

Donald S. Reay
MILLER, REAY & ASSOCIATES
donald@reaylaw.com
ATTORNEY FOR R. GREGORY SHEPARD
AND ROGER FREEBORN

/s/ Erin Healy Gallagher
ERIN HEALY GALLAGHER
Trial Attorney