Healy Gallagher, Erin (TAX)

From:	Moran, Christopher R. (TAX)
Sent:	Monday, June 13, 2016 10:33 AM
То:	Justin Heideman; Donald Reay
Cc:	Hines, Erin R. (TAX)
Subject:	USA V. RaPower3, et al USA Notice of Intent to Subpoena Documents
Attachments:	2016 06 13 Notice of Intent to Subpoena Documents.pdf

Dear Counsel:

Please see the attached notice. I will send the subpoenas in a separate email. If you do not receive it, please let me know and we will send them on a disk. The email will be encrypted with the same password we used on the subpoenas provided on May 26, 2016. Please let me know if you need the password or have any other issues opening the documents.

Thanks.

Chris

Christopher R. Moran Trial Attorney, Civil Trial Section-Central Region Tax Division U.S. Department of Justice Telephone: 202-307-0834 FAX: 202-514-6770



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 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

PLAINTIFF UNITED STATES' NOTICE OF INTENT TO SUBPOENA DOCUMENTS

Judge David Nuffer

Plaintiff, United States of America, hereby gives notice of its intent to serve subpoenas

for documents to the following entities:

Entity	Address
Wells Fargo Bank, N.A.	Subpoena Processing Chandler P.O. Box 29728 S3928-020 Phoenix, AZ 85038
Millard County Credit Union	Attn: Steve Shiner, President 109 S. 300 East Delta, UT 84624
Zions Bank)	Attn: Custodian of Records UTSC 0929 1875 S. Redwood Road Salt Lake City, UT 84101
Bank of American Fork	Attn: Randall Benson, Legal Dept. 380 N. 200 West, Ste. 101 Bountiful, UT 84010
Cyprus Credit Union	Attn: Accounting 3876 W. Center View Way, West Jordan, UT 84084
Key Bank, N.A.	Attn: Judgment Processing 4900 Tiedeman Road Mailcode OH-01-49-3001 Brooklyn, OH 44144
J.P. Morgan Chase Bank, NA	National Subpoena Processing Dept., 7610 W. Washington Street, Indianapolis, IN 46231

Case 2:15-cv-00828-DN-BCW Document 73-1 Filed 08/01/16 Page 4 of 6

Copies of the subpoenas are provided separately via encrypted email.

Dated:

June 13, 2016

JOHN W. HUBER United States Attorney

<u>/s/ Christopher R. Moran</u> CHRISTOPHER R. MORAN New York Bar No. 5033832 Email: christopher.r.moran@usdoj.gov Telephone: (202) 307-0834 ERIN R. HINES FL Bar No. 44175 Email: erin.r.hines@usdoj.gov Telephone: (202) 514-6619 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 June 13, 2016. The foregoing document was sent via electronic mail to the following counsel of record:

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 43 West 9000 South, Suite B Sandy, Utah 84070 donald@reaylaw.com ATTORNEY FOR R. GREGORY SHEPARD AND ROGER FREEBORN

Healy Gallagher, Erin (TAX)

From:	Moran, Christopher R. (TAX)
Sent:	Monday, June 13, 2016 10:35 AM
То:	Justin Heideman; Donald Reay
Cc:	Hines, Erin R. (TAX)
Subject:	RE: USA V. RaPower3, et al Subpoenas
Attachments:	WinZip Compressed Attachments.zip

Subpoenas attached. Please let me know if you need the password.

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