

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

UNITED STATES OF)	Deposition of:
AMERICA,)	
Plaintiff,)	LYNETTE L. WILLIAMS
)	
vs.)	Time on record:
)	5 Hours, 12 Minutes
RaPower3, LLC,)	
INTERNATIONAL)	Case No. 2:15-cv-00828 DN
AUTOMATED SYSTEMS,)	
INC., LTBl, LLC, R.)	Judge David Nuffer
GREGORY SHEPARD, ELDON)	
JOHNSON and ROGER)	
FREEBORN,)	
)	
Defendants.)	

August 9, 2016 * 9:13 a.m. to 3:54 p.m.

Location: United States Attorney's Office
185 South State Street -- Suite 300
Salt Lake City, Utah

Reporter: Denise M. Thomas, CRR/RPR

**Plaintiff
Exhibit**

C

Williams, Lynette L.

A P P E A R A N C E S

FOR THE PLAINTIFF:

Erin Healy-Gallagher
Christopher R. Moran
Erin R. Hines (Telephonically)
UNITED STATES DEPARTMENT OF JUSTICE
Trial Attorneys, Tax Division
P. O. Box 7328
Washington, D. C. 20044
Telephone: 202.307.0834 (Moran)
202.353.2452 (Healy-Gallagher)
Fax: 202.514.6770
E-mail: christopher.r.moran@usdoj.gov
erin.healygallagher@usdoj.gov

FOR THE DEFENDANTS RAPOWER3, LLC, INTERNATIONAL
AUTOMATED SYSTEMS, INC., LTB1, LLC, AND NELDON
JOHNSON:

Christian D. Austin
Travis J. Sorenson
HEIDEMAN & ASSOCIATES
Attorneys at Law
2696 No. University Avenue -- Suite 180
Provo, Utah 84604
Telephone: 801.472.7742
Fax: 801.374.1724
E-mail: jheideman@heidlaw.com
caustin@heidlaw.com
tsorenson@heidlaw.com

FOR THE DEFENDANTS R. GREGORY SHEPHERD AND ROGER
FREEBORN:

Donald S. Reay
MILLER, REAY & ASSOCIATES
Attorneys at Law
43 West 9000 South -- Suite B
Sandy, Utah 84070
Telephone: 801.999.8529
Fax: 801.206.0211
E-mail: donald@reaylaw.com

A P P E A R A N C E S (Continued)

FOR THE WITNESS:

Paul W. Jones
STOEL RIVES, LLP
Attorneys at Law
4766 Holladay Boulevard
Salt Lake City, Utah 84117
Telephone: 801.930.5101
Fax: 801.208.8995
E-mail: pwjones@stoel.com

* * *

P R O C E E D I N G S

LYNETTE L. WILLIAMS,

having been first duly sworn to tell the
truth, was examined and testified as follows:

EXAMINATION

BY MS. HEALY-GALLAGHER:

Q. Would you please say and spell your name
for the record?

A. Lynnette Williams, L-y-n-e-t-t-e, middle
initial L, Williams, W-i-l-l-i-a-m-s.

Q. Good morning, Ms. Williams. We are on the
record in the case of United States versus RaPower3,
et al., on August 9, 2016. We met a moment ago, but,
again, my name is Erin Healy-Gallagher. I'm from the
United States Department of Justice, the Tax
Division, and I'm appearing on behalf of the
United States. We have a court reporter here to
record the proceedings.

MS. HEALY-GALLAGHER: Counsel, would you
please make your appearances?

MR. JONES: Paul Jones for Lynette
Williams.

MR. AUSTIN: Christian Austin and Travis

1 MR. JONES: Objection. Leading.

2 THE WITNESS: I don't know.

3 MR. REAY: Objection. Asked and answered.

4 Q. (By Ms. Healy-Gallagher) Do you remember
5 whether he talked about sources of income from owning
6 the lenses?

7 MR. JONES: Objection. Leading.

8 THE WITNESS: I don't remember.

9 Q. (By Ms. Healy-Gallagher) Ms. Williams,
10 when's the last time you visited RaPower3.com?

11 A. I have no idea.

12 Q. Was it in the last year?

13 MR. JONES: Objection. Asked and
14 answered.

15 THE WITNESS: I don't know.

16 Q. (By Ms. Healy-Gallagher) Are you aware of
17 a member office section of the RaPower3 website?

18 A. I don't know what's on the website. There
19 was at one point in time. I have no idea now.

20 Q. Have you ever logged in to a member office
21 section of the RaPower3 website?

22 A. Yes, but it's been a long time.

23 Q. About how long?

24 A. I have no idea.

25 Q. Do you know if it was in the last year?

1 A. Not that I remember, no.

2 Q. Ms. Williams, do you have an understanding
3 of what the term "sponsor" means with respect to
4 RaPower3?

5 A. Sponsor. I don't know.

6 Q. Do you know whether you have a sponsor
7 into RaPower3?

8 A. Oh, yes, I do, and I believe it's
9 Greg Shepard, but I don't know for sure.

10 Q. And why do you think that?

11 A. Because he's the one that told me about
12 the whole thing.

13 Q. Are you someone else's sponsor?

14 A. I sold lenses, so I don't know. I might
15 be because of that. I don't know.

16 Q. Ms. Williams, how did you decide who to
17 talk to about buying solar lenses?

18 MR. JONES: Objection, asked and answered;
19 objection, vague; objection, calls for speculation.

20 THE WITNESS: I don't know. Am I supposed
21 to have talked to somebody?

22 MR. JONES: No. Let her ask the
23 questions.

24 Q. (By Ms. Healy-Gallagher) Here's my
25 question: So you mentioned that you talked to

1 Q. Have you ever heard of an entity called
2 DCL16BLT?

3 A. No.

4 Q. Ever heard of an entity called XSun
5 Energy? That's the letter X, S-u-n Energy?

6 A. I don't believe so.

7 Q. You don't believe so?

8 A. No, I don't.

9 Q. How about the entity Sun Power Associates?

10 A. No.

11 Q. Have you ever heard of that entity?

12 A. No.

13 Q. Let's go back to the convention that we
14 were talking about a little bit earlier.

15 When you say you went on a site visit
16 connected with the convention, tell me about that
17 site visit.

18 What did you do? What did you see?

19 A. I drove down in my own car, and I drove to
20 the site where we were told to go that had equipment
21 for us to look at, lenses. I looked at that and then
22 drove out to where the towers are, looked at that,
23 felt the heat, watched some guy have to move very
24 quickly because it was very hot on his head. They
25 gave me a little piece of the lens, took some

1 pictures, drove home.

2 Q. Okay. Let's break that down a little bit.

3 Who told you where to go?

4 A. The information was given to us at the --
5 to me at the convention.

6 Q. Who gave it to you?

7 A. There was a piece of paper that was there
8 on the table.

9 Q. Do you know who put that piece of paper on
10 the table?

11 A. I have no idea.

12 Q. What did the piece of paper say?

13 A. It told me where to go in Delta.

14 Q. Did it give you driving directions?

15 A. I don't remember.

16 Q. Did it give you an address?

17 A. It must have because I ended up there.

18 Q. So when you got to the first place on your
19 site visit, what did you see there? Was there a
20 building? Was it open space?

21 A. It was a building, and it had some
22 machinery in it, and they showed us how it worked,
23 and that's what we saw.

24 Q. When you were at the building, who showed
25 you the building?

1 A. Neldon.

2 Q. Neldon Johnson?

3 A. Uh-huh (yes) .

4 Q. Yes?

5 A. Yes.

6 Q. Who told you how the machinery worked?

7 A. Neldon.

8 Q. Neldon Johnson?

9 A. Uh-huh (yes) .

10 Q. Yes?

11 A. Yes.

12 Q. This will go faster if you will say

13 Neldon Johnson if you mean Neldon.

14 At the building, what did Mr. Johnson say
15 about the machinery.

16 A. I don't remember.

17 Q. What did he say about how the machinery
18 worked?

19 A. I don't remember.

20 Q. What did he say was the point of the
21 machinery?

22 A. It was a part of the process. I don't
23 remember specifics.

24 Q. Did Mr. Johnson say what was being
25 produced there?

1 A. It was part of the process. I don't
2 remember the specifics.

3 Q. Part of what process?

4 A. Generating electricity.

5 Q. So did Mr. Johnson say that energy was
6 being generated on the site of the building?

7 A. I don't remember.

8 Q. What else did you see at the building
9 site?

10 A. There was a -- crap, I remember being
11 right here. The lens was set up at the end so we
12 could see the lens, you know, a pie thing
13 (indicating).

14 Q. Are the lenses that we're talking about
15 sort of pie-shaped?

16 A. The ones that I saw, yes.

17 Q. So did you see a lens propped up on the
18 floor or was it up in a tower when you were at the
19 building site?

20 A. It was set up in like a framework thing.
21 It was not like leaning against the wall. It was
22 like a framework thing like it would be attached on
23 the tower so we could see how that worked.

24 Q. Did Mr. Johnson explain how the lens
25 worked?

1 A. Yes.

2 Q. When you were at the building site, did
3 you see your lenses?

4 A. I have no idea.

5 Q. What else did you see at the building
6 site?

7 A. There was a trailer there, and it did some
8 kind of work, and we saw how it worked, and we went
9 inside, saw it and we climbed back out.

10 Q. So what was happening in the --

11 A. I have not a clue. I just remember going
12 in. It looked pretty cool. I have no idea. I don't
13 know what it was. It was part of the process.
14 That's all I know.

15 Q. Let me finish my question, please.

16 What was happening inside the trailer?

17 A. There was a piece of machinery that did
18 something. I don't know.

19 Q. You don't know what it did?

20 A. I don't remember.

21 Q. Did Mr. Johnson explain what was happening
22 inside the trailer?

23 A. Uh-huh (yes).

24 Q. Yes?

25 A. Yes.

1 Q. At the building site, what else did you
2 see?

3 A. I think that's all I saw.

4 Q. Did you take pictures at the building
5 site?

6 A. I took a picture of my daughter and I at
7 the lens.

8 Q. Did you take any other pictures?

9 A. I don't remember.

10 Q. Do you still have that picture?

11 A. I have no idea. My computer crashed and I
12 don't know.

13 Q. About how many people were with you at the
14 building site?

15 A. You want me to guess?

16 Q. I'd like to know from you how many people
17 were at the site.

18 A. I don't know exactly how many people were
19 at the site.

20 Q. Were there more than five?

21 A. Then you're asking me to guess, and I
22 don't know.

23 Q. I'm asking for you to tell me if you think
24 it was more than five.

25 A. I think it was more than five.

1 Q. Do you think it was more than ten?

2 A. It was around ten I would guess, something
3 like that. I don't know.

4 Q. With respect to your first site visit,
5 we've talked about what happened at the first stop on
6 that visit at the building that you saw?

7 A. Uh-huh (yes).

8 Q. Yes?

9 A. Yes.

10 Q. What was your next step on your site
11 visit?

12 A. To go see the towers.

13 Q. Who told you where they were?

14 A. I don't think anyone told us. I think
15 they just said follow and we followed them down the
16 road.

17 Q. Who is "they"?

18 A. Whoever was in charge. Probably Neldon,
19 Greg.

20 Q. Neldon Johnson and Greg Shepard?

21 A. Uh-huh (yes).

22 Q. Yes?

23 A. Yes.

24 Q. So describe for me, if you can, the area
25 where the towers are.

1 What did you see there?

2 A. It's just flat ground, and the towers are
3 there, and it has the lenses like what we saw on
4 the -- I call them flying saucers. They look like
5 that. I don't know what the right terms are, but the
6 round thing on the tower.

7 Q. Did you actually enter onto the site --

8 A. Yes.

9 Q. -- that has the towers?

10 A. Yes.

11 Q. Did anyone speak to you on the site?

12 A. Yes.

13 Q. Who was that?

14 A. Neldon Johnson.

15 Q. Anyone else?

16 A. I talked to people around me.

17 Q. Did anyone other than Neldon Johnson make
18 any sort of presentation about the technology on the
19 site?

20 A. Not that I remember.

21 Q. So what did Mr. Johnson say?

22 A. I have no recollection. I don't know.

23 Q. Do you have an understanding about how
24 things worked on the site?

25 A. Yeah.

1 Q. What was that understanding?

2 A. My understanding is that the rays come
3 down and hit the lens and it generates heat, and
4 that's what we saw.

5 Q. Ms. Williams, you saw lenses generate
6 heat?

7 A. Yes, I did.

8 Q. How did you see that happen?

9 A. How did I see that happen?

10 Q. Yes. What happened to show you or help
11 you understand that the lenses were generating heat?

12 A. I could feel it.

13 Q. Tell me about that.

14 Where were you standing? What was
15 happening?

16 A. Right by the lens. I put out my hand, and
17 I could feel the heat, and then there was one that
18 came down and had a thing here and there was a lot of
19 light that came through it, and that was pretty hot.
20 I kept my daughter away from it. It looked pretty
21 hot to me.

22 Q. Correct me if I'm wrong.

23 It sounds like there were two ways that
24 heat was demonstrated to you; is that right?

25 A. No. It was still coming down through the

1 lens, but there was just one that went through the
2 lens, and then it had another piece attached to it,
3 so it was just a little further on in the process.
4 Same thing, but just a little further in the process.

5 Q. I'm trying to understand sort of where you
6 were in relationship to where the heat was coming
7 through the lens.

8 Like was there a demonstration of someone
9 holding a lens up that you felt heat underneath? Did
10 you see something like that?

11 A. No. These were attached to the towers.

12 Q. Okay. So you saw lenses attached to
13 towers?

14 A. Uh-huh (yes).

15 Q. And you felt heat --

16 A. Yes.

17 Q. -- from the lenses that were attached to
18 the towers --

19 A. Yes.

20 Q. -- correct?

21 A. Yes.

22 Q. Okay. About how far away were you from
23 the tower when you felt this heat?

24 A. I was underneath the tower.

25 Q. And you talked about the lens being

1 directed at something?

2 A. Well, the lens is up here -- the lens is
3 up here (indicating). There was some little thing.
4 I don't understand the process. I'm not the techie
5 person there. I know it came down to this thing, and
6 there was more heat that came through that.

7 Q. Does the term "concentrator" ring a
8 bell --

9 A. That sounds right.

10 Q. -- for you?

11 A. The thing was -- I think that sounds
12 right.

13 Q. And about how far away were you from the
14 concentrator?

15 A. Pretty close, because I went up to feel
16 the heat.

17 Q. So did you put your hand under --

18 A. Uh-huh (yes).

19 Q. Let me finish the question.

20 Did you put your hand under the
21 concentrator?

22 A. Either under or right by it. I couldn't
23 tell you for sure.

24 Q. Did it burn you?

25 A. No. It was quick because it was very hot.

1 I probably just went around it or something. I don't
2 know. I could feel there was heat coming through.

3 Q. Did anyone get burned?

4 A. Not that I know of. I don't know.

5 Q. Not that you saw?

6 A. (Witness shaking head negatively.)

7 Q. Correct?

8 A. Huh-uh, no.

9 Q. Did you see anything burned while you were
10 on the site at your first site visit?

11 A. I don't remember.

12 Q. Did you see anything other than the lenses
13 on the towers while you were on your first site
14 visit?

15 A. The concentrator, the towers.

16 Q. Anything else?

17 A. I don't remember.

18 Q. On your first site visit, Ms. Williams,
19 were you ever asked to sign a nondisclosure
20 agreement?

21 A. No, huh-uh.

22 Q. Did you ever actually sign a nondisclosure
23 agreement?

24 A. No. You can go take a look. It's all
25 public. Just drive down there, go see them.

1 Q. Correct me if I'm wrong. I just want to
2 make sure I'm understanding.

3 Did you say that somebody walked
4 underneath the concentrator or burned -- somebody's
5 head got burned or warm or --

6 A. I couldn't say that myself, but I think
7 there was something that happened around that. I
8 don't know. It was warm. I know it was warm.
9 That's all I could tell you.

10 Q. On your first site visit, did anyone tell
11 you that the lenses were in use to generate
12 electricity?

13 A. I don't remember.

14 Q. To your understanding, Ms. Williams, have
15 your lenses ever been used to generate electricity?

16 A. I don't know.

17 Q. All right. So did anything else happen on
18 your first site visit to Delta, Utah?

19 A. Not really. I think that's what happened.

20 Q. And, Ms. Williams, I believe you testified
21 you went to more than one RaPower3 convention?

22 A. Uh-huh (yes).

23 Q. Yes?

24 A. Yes.

25 Q. So what, if anything, was different about

1 form of handouts at your first RaPower3 convention?

2 A. I don't think so. I don't know. I don't
3 think so.

4 Q. Did you get any materials in the form of
5 handouts at your second RaPower3 convention?

6 A. I don't think so.

7 Q. For your second site visit, what was your
8 first stop?

9 A. Well, I went back to the same place that I
10 had gone before, but apparently they moved, so then I
11 went to the -- that was my mistake. Then I went out
12 to the site to see the towers and they weren't there,
13 and so I called Greg, and he said they were having
14 lunch at some park or something, so I went there, and
15 that's where I met up with them, and then we went to
16 a warehouse. Maybe that's not the right term, but a
17 big building where they were -- there were a bunch of
18 lenses and they were manufacturing things. I don't
19 know what the right terminology is. Sorry, but I
20 don't know, and they showed us how they were putting
21 things together.

22 Q. So when you got to the site and no one was
23 there, why did you call Greg Shepard?

24 A. Because Greg knows lots of stuff, so I
25 called Greg.

1 Q. And Mr. Shepard told you to meet them at
2 the park?

3 A. Uh-huh (yes) .

4 Q. Yes?

5 A. Yes.

6 Q. After the park, you went to a warehouse
7 you said?

8 A. I don't know if that's the right term.
9 Maybe manufacturing plant is a better term. I don't
10 know what the right terminology is, so I don't want
11 to be using the wrong term and being told it's the
12 wrong term. I don't know the right term.

13 I went to a building, and it had a lot of
14 lenses and they were doing other stuff. Again, it's
15 part of the process, but I don't know all the pieces.

16 Q. So when you went to the building, did
17 anyone make a presentation to you and the group?

18 A. Neldon.

19 Q. Mr. Neldon Johnson?

20 A. Yes.

21 Q. What did Mr. Johnson say?

22 A. I don't remember.

23 Q. Did he give you a tour of the building?

24 A. We went inside the building, yes.

25 Q. Did you walk around the building?

1 A. Yes, I did.

2 Q. Did you look at different things that were
3 in the building?

4 A. Yes, I did.

5 Q. Did Mr. Johnson lead that?

6 A. I don't think so. I think, if I remember
7 right, he talked to us in the front, and then we just
8 got to walk through.

9 Q. What did Mr. Johnson say?

10 A. I don't remember.

11 Q. About how many people were with you at the
12 building?

13 A. My daughter was with me. There were more
14 this time, but I don't -- maybe 20. I don't know. I
15 don't know. I don't know.

16 Q. Do you know if those approximately 20
17 people were already customers of RaPower3?

18 A. I have no idea. I don't know anything
19 about that.

20 Q. What, if anything else, happened at the
21 building?

22 A. That was it. He talked to us in the front
23 and we got to walk through and look at stuff. That
24 was it.

25 Q. What happened next?

1 A. If I remember right, I left after that.

2 We came home.

3 Q. So did you not visit the site with the
4 solar towers after the warehouse?

5 A. No.

6 Q. Why not?

7 A. Time frame wise I needed to get home.

8 Q. When you had gone to the solar tower site
9 before joining the group at the park --

10 A. Uh-huh (yes).

11 Q. -- how much time did you spend there?

12 A. Not a long time. I bet we were there
13 30 minutes or something, just kind of walked around a
14 little bit.

15 Q. What, if anything, on the site where the
16 towers were was different on your second visit as
17 opposed to your first visit?

18 A. There were more things put together and
19 there were -- I don't know what it was. I think that
20 there was something over on the one side. Obviously,
21 things had happened, more stuff was going on, but I
22 couldn't tell you -- I couldn't sit here and say, oh,
23 this was different or that was different. It was
24 different. It was like it had progressed. There
25 were more things. That's all I could tell you. I

1 A. Yeah.

2 Q. Why do you think that?

3 A. Just because of more stuff that was there.

4 Q. Did you feel heat from the lenses while
5 you were there on your second visit?

6 A. I don't remember.

7 Q. On your second visit, did you see any
8 lenses in use to produce electricity?

9 A. I don't remember.

10 Q. All right, Ms. Williams, do you recall
11 having participated in a third RaPower3 convention?

12 A. No, I don't. Sorry.

13 Q. Do you recall having made a third site
14 visit to Delta, Utah?

15 A. I don't remember.

16 Q. With respect to your second RaPower3
17 convention, were you ever asked to sign a
18 nondisclosure agreement?

19 A. No.

20 Q. Did you ever actually sign a nondisclosure
21 agreement?

22 A. I don't remember doing it, no.

23 Q. Ms. Williams, do you recall ever hearing
24 the law firm name Kirton McConkie?

25 A. I heard Greg mention that.

1 A. Greg.

2 Q. Greg Shepard?

3 A. Uh-huh (yes).

4 Q. Yes?

5 A. Yes.

6 Q. Was Greg Shepard the one who filmed the
7 video?

8 A. I'm sorry. I don't remember.

9 Q. Do you remember who filmed the video?

10 A. I don't.

11 MS. HEALY-GALLAGHER: Let's go off the
12 record for a second.

13 (Discussion held off the record.)

14 MS. HEALY-GALLAGHER: Okay. You can put
15 Plaintiff's 113 aside.

16 Plaintiff's 114, please.

17 (EXHIBIT 114 WAS MARKED.)

18 MS. HEALY-GALLAGHER: Ms. Williams, please
19 take a look at Plaintiff's Exhibit 114.

20 For the record, this is marked as
21 Gregg_P&R-2242 through 2244.

22 THE WITNESS: I'm sorry. I thought you
23 were going to look at them. I apologize.

24 Q. (By Ms. Healy-Gallagher) All right.
25 Plaintiff's Exhibit 114 is an e-mail from

1 Greg Shepard, greg@rapower3.com.

2 Do you see that?

3 A. Uh-huh (yes).

4 Q. Yes?

5 A. Yes.

6 Q. The date is Saturday June 30, 2012,

7 correct?

8 A. Yes.

9 Q. And the subject is Convention Photos.

10 Do you see that?

11 A. Yes.

12 Q. The e-mail purports to attach convention

13 Monday.JPG and convention Tuesday.JPG.

14 Do you see that?

15 A. Uh-huh (yes).

16 Q. Yes?

17 A. Yes.

18 Q. The e-mail reads: "Thanks to Lynette

19 for these two photos. 1. Monday's leadership

20 meeting 2. Neldon Johnson explaining the

21 turbine."

22 Do you see that?

23 A. Uh-huh (yes).

24 Q. Yes?

25 A. Yes.

1 Q. Then if we take a look at the next couple
2 of pages, on 2243 and 44 there are photos, correct?

3 A. Yes.

4 Q. Did you take these photos?

5 A. I must have. If he said I did, then I
6 probably did.

7 Q. So, Ms. Williams, you attended at least a
8 third RaPower3 convention, correct?

9 A. I don't think so. I thought I was -- I
10 don't know. This is my memory of where the first one
11 was (indicating), and this is my memory of where the
12 second one was (indicating), but maybe I missed
13 something.

14 Q. So, maám, you are pointing at the page
15 marked 2243 --

16 A. I just remember I told you it was
17 upstairs, and this one I said was downstairs,
18 remember I told you that, in the auditorium. That's
19 this one -- maybe my memory isn't right, but I don't
20 remember them being together like that, but okay. I
21 guess I did because he wouldn't lie, so I must have
22 taken the pictures. I don't know. I don't recall
23 that, but okay.

24 Q. So let's unpack that a little bit.

25 The picture that's in 2243 you recognize

1 as being a room where?

2 A. In the Salt Lake Library.

3 Q. And you said it was upstairs?

4 A. (Witness nodding head affirmatively.)

5 Q. Yes?

6 A. My recollection, yes, it's upstairs.

7 Q. And you have been in that room, correct?

8 A. Yes.

9 Q. Yes?

10 A. Yes.

11 Q. And you have taken pictures at RaPower3
12 conventions before, correct?

13 A. Yes.

14 Q. Do you know who the people are in the
15 picture at 2243?

16 A. I think that's Greg, but I can't really
17 see it too well.

18 Q. Who are you pointing to?

19 A. Right here (indicating). I think that's
20 Greg, but I could be wrong.

21 Q. So a gentleman in the front row, the
22 fourth from the left?

23 A. Sitting down the third one from the left.

24 Q. Third one from the left. Okay.

25 Do you recognize anyone else in this

1 picture?

2 A. I don't. I'm sorry.

3 Q. Please turn the page to 2244.

4 Maám, you said you recognized the room
5 featured in this photo, correct?

6 A. This is the one I told you about.

7 Q. Where is this room?

8 A. It's the auditorium downstairs at the
9 library.

10 Q. Are you able to see who is at the podium?

11 A. It's hard to see. I think that's Neldon.

12 Q. Neldon Johnson?

13 A. Yes. And Greg, I think, is sitting at the
14 table.

15 Q. And that's Greg Shepard behind the laptop
16 at the front of the room?

17 A. I believe that's correct.

18 Q. Do you know what's pictured on the screen?

19 A. It says it over here. The turbine. I
20 think that's what the turbine looks like.

21 Q. Maám, do you remember what happened during
22 the leadership meeting on Monday?

23 A. No, I don't. I'm sure it was more
24 conversation, but I don't know.

25 Q. Do you remember anything else that