

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

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UNITED STATES OF  
AMERICA, ) Deposition of:  
 )  
Plaintiff, ) ROBERT ROWBOTHAM  
 )  
vs. )  
 ) Time on record:  
 ) 3 Hours, 31 Minutes  
RAPOWER-3, LLC, )  
INTERNATIONAL )  
AUTOMATED SYSTEMS, )  
INC., LTBI, LLC, R. ) Case No. 2:15-cv-00828 DN  
GREGORY SHEPARD, ELDON )  
JOHNSON and ROGER )  
FREEBORN, ) Judge David Nuffer  
 )  
Defendants. )

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August 8, 2016 \* 1:13 p.m. to 5:08 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**

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A P P E A R A N C E S

FOR THE PLAINTIFF:

Christopher R. Moran  
Erin Healy-Gallagher  
Erin R. Hines (Telephonically)  
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FOR THE DEFENDANTS RAPOWER3, LLC, INTERNATIONAL  
AUTOMATED SYSTEMS, INC., LTB1, LLC, AND NELDON  
JOHNSON:

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

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\* \* \*

P R O C E E D I N G S

ROBERT ROWBOTHAM,

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

MR. MORAN: Good afternoon, Mr. Rowbotham.

My name is Chris Moran. I'll be taking your  
deposition today. I'm here on behalf of the  
United States.

Could counsel please put your appearances  
on the record, starting with Ms. Healy-Gallagher.

MS. HEALY-GALLAGHER: Erin Healy-Gallagher  
also here on behalf of the United States.

MR. REAY: Donald Reay on behalf of  
Greg Shepard and Roger Freeborn.

MR. HEIDEMAN: Justin Heideman on behalf  
of the other Defendants.

MR. GILSON: James Gilson on behalf of the  
witness, Mr. Rowbotham.

MR. MORAN: And we're also joined by  
counsel for the United States, Ms. Erin Hines, who is  
on the telephone.

1 BFS.

2 Q. What about solar lenses?

3 A. As a potential to benefit BFS if it works.

4 If you gave me more money that I could work with

5 kids, anybody that would deal with me from that

6 standpoint I would deal with positively, legally.

7 Q. So you expect that at some point your

8 solar lenses are going to generate money that will

9 help you deal with kids?

10 A. I would love to have that happen.

11 Q. Okay. Has it happened yet?

12 A. Well, it's happened to the extent that

13 I've got my money back and I'm still in business.

14 Q. And that's the money you've gotten from

15 the multilevel marketing?

16 A. Yes, sir.

17 Q. Have you ever been told that any

18 information you received from either RaPower3 or

19 International Automated Systems or Greg Shepard or

20 Neldon Johnson was confidential?

21 A. No.

22 Q. Have you ever been asked to sign a

23 nondisclosure agreement?

24 A. No.

25 MR. MORAN: I have no further questions at