

EXHIBIT B

<p>1 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH 2 CENTRAL DIVISION 3 4 UNITED STATES OF AMERICA)) 5 Plaintiff,) Civil No.) 2:15-cv-00828-DN 6 v.)) 7 RAPOWER-3, LLC;) INTERNATIONAL AUTOMATED) 8 SYSTEMS, INC., LTBI, LLC; R.) GREGORY SHEPARD; NELDON) 9 JOHNSON; and ROGER FREEBORN,)) Judge Nuffer 10 Defendants.) ----- 11 DEPOSITION OF PRESTON OLSEN 12 September 4, 2020 10:04 a.m. 13 Location: Parr Brown Gee & Loveless, P.C. 14 101 South 200 East, Suite 700 15 Salt Lake City, Utah 84111 16 17 18 19 20 21 22 Reported by: HEIDI HUNTER, RPR, CSR 23 24 25</p>	<p style="text-align: right;">3</p> <p style="text-align: center;">I N D E X</p> <p style="text-align: right;">PAGE</p> <p>Preston Olsen 4 Examination by Mr. Klein 4</p> <p style="text-align: center;">E X H I B I T S (None marked)</p> <p>11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
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<p style="text-align: center;">2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1 FOR THE COURT-APPOINTED RECEIVER: 2 R. Wayne Klein 3 KLEIN & ASSOCIATES 4 Attorneys at Law P.O. Box 1836 5 Salt Lake City, UT 84110 Tel: 801.824.9616 6 Email: wklein@kleinutah.com 7 8 FOR NELDON JOHNSON: 9 Edwin S. Wall (via telephone) WALL LAW OFFICE 10 Attorneys at Law 43 East 400 South 11 Salt Lake City, UT 84111 Tel: 801.746.0900 12 13 ALSO PRESENT: 14 (None) 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">4</p> <p style="text-align: center;">P R O C E E D I N G S</p> <p style="text-align: center;">PRESTON OLSEN, called as a witness, being first duly sworn, was examined and testified as follows:</p> <p style="text-align: center;">EXAMINATION</p> <p>BY MR. KLEIN: Q Mr. Olsen, are you represented by counsel today? A I am not. MR. KLEIN: Okay. Ed, you want to go ahead and make your appearance? MR. WALL: Certainly. I'm Edwin Wall on behalf of Neldon Johnson. MR. KLEIN: Let's me see if I can figure out the volume here. Off the record. (Off-record discussion.) BY MR. KLEIN: Q Mr. Olsen, if you give us your full name. A Yes. It's Preston Frederick Olsen. Q Are you feeling well today? A Yes. Q Are you taking any medications or any reason you can't give complete and accurate answers today?</p> <p>11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
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5	<p>1 A I do take medications but I don't think they</p> <p>2 affect my answers.</p> <p>3 Q Have you ever been deposed before?</p> <p>4 A Do what?</p> <p>5 Q Have you ever been deposed before?</p> <p>6 A Yes.</p> <p>7 Q So just reminder that we'll try and avoid</p> <p>8 talking over each other and to give yes no answers</p> <p>9 instead of uh-huh and huh-uh. If you need to take a</p> <p>10 break, let me know. And when any pending questions have</p> <p>11 been answered, we'll take a break, which we'll try to do</p> <p>12 periodically.</p> <p>13 What's your phone number telephone number?</p> <p>14 A My personal number is 801-706-4114.</p> <p>15 Q And your email?</p> <p>16 A My personal email is preston -- P-R-E-S-T-O-N,</p> <p>17 F as in Frank, X@gmail.com.</p> <p>18 Q And what's your employment?</p> <p>19 A I am an attorney.</p> <p>20 Q With a firm or on your own?</p> <p>21 A With a firm.</p> <p>22 Q And what kind of law do you practice?</p> <p>23 A I practice public finance.</p> <p>24 Q Are you appearing today voluntarily?</p> <p>25 A Yes.</p>	7
6	<p>1 Q You've been handed what's been marked as</p> <p>2 Receiver Exhibit 2204, which is Notice of Deposition of</p> <p>3 Preston Olsen. Have you seen this before?</p> <p>4 A I believe I have.</p> <p>5 Q And is this a correct copy of the document</p> <p>6 that you were given?</p> <p>7 A I'm not sure. I didn't really look at it</p> <p>8 closely. It looks fine to me.</p> <p>9 Q I'll create a pile of your copies of the</p> <p>10 documents we're going to be talking about today.</p> <p>11 How would you describe your knowledge and</p> <p>12 involvement with Neldon Johnson's solar development?</p> <p>13 A I first was introduced to the Johnsons and the</p> <p>14 technology I believe in 2009. And since then, I've</p> <p>15 tried to follow as closely as I can the advancements and</p> <p>16 try to understand the technology and how it can be</p> <p>17 applied.</p> <p>18 Q Do you have a technical background?</p> <p>19 A I do not.</p> <p>20 Q And who first introduced you to the</p> <p>21 technology?</p> <p>22 A I was first introduced by a man named Matthew</p> <p>23 Shepard.</p> <p>24 Q When did you first meet Neldon Johnson?</p> <p>25 A I believe it was in 2009.</p>	8
	<p>1 Q And how did you meet him?</p> <p>2 A I think Matthew Shepard introduced the</p> <p>3 opportunity to participate in purchasing lenses from</p> <p>4 Neldon Johnson's company. And I believe the first time</p> <p>5 I met him he came to my office to explain the</p> <p>6 opportunity.</p> <p>7 Q "He" being Neldon Johnson?</p> <p>8 A Both, both of them came together.</p> <p>9 Q And so Matt -- did Matt Shepard arrange a</p> <p>10 meeting and then he came to your office along with</p> <p>11 Neldon Johnson to explain the solar lenses?</p> <p>12 A Yes.</p> <p>13 Q Were these solar lenses you were buying</p> <p>14 through Rapower?</p> <p>15 A I think in 2009 Rapower hadn't been formed</p> <p>16 yet. I think it was International Automated Systems.</p> <p>17 Q So in the early days you were buying lenses</p> <p>18 from IAS and then later through Rapower?</p> <p>19 A Yes.</p> <p>20 Q And what do you know about IAS?</p> <p>21 A I know it's a -- it was public company, that</p> <p>22 it was developing solar technology.</p> <p>23 Q Do you know if IAS had any business other than</p> <p>24 developing solar technology?</p> <p>25 A I know it had previously worked on some sort</p>	
	<p>1 of communication technology. I don't know too much</p> <p>2 more.</p> <p>3 Q Have you ever owned stock in International</p> <p>4 Automated Systems?</p> <p>5 A Yes.</p> <p>6 Q How did you get that stock?</p> <p>7 A I purchased it in a brokerage account.</p> <p>8 Q So you bought the stock on the open market?</p> <p>9 A Yes.</p> <p>10 Q And do you still own that stock?</p> <p>11 A I believe it's been canceled, so I don't</p> <p>12 believe I own anything.</p> <p>13 Q Well, have you sold the stock or do you still</p> <p>14 have the stock shares that you once purchased?</p> <p>15 A I really don't know. I haven't sold anything,</p> <p>16 ever.</p> <p>17 Q Do you know what other companies that Neldon</p> <p>18 Johnson has owned or managed?</p> <p>19 A I don't.</p> <p>20 Q Are you familiar with any other companies</p> <p>21 you've heard that are affiliated with Neldon Johnson?</p> <p>22 A I have heard some other names, but right now I</p> <p>23 can think one called Black Night. That's about it. I</p> <p>24 don't know off the top of my head.</p> <p>25 Q And do you recall anything else about Black</p>	

9	<p>1 Night?</p> <p>2 A Only that I was told I think at one point that</p> <p>3 it owned some of the technology, some of the patents.</p> <p>4 Q Are you aware that IAS was a publically held</p> <p>5 company?</p> <p>6 A Yes. I was a shareholder.</p> <p>7 Q Did you ever read any of the annual reports or</p> <p>8 quarterly reports that the company produced?</p> <p>9 A I read one or two.</p> <p>10 Q Did the company send those to you or did you</p> <p>11 research it your own?</p> <p>12 A I looked on the SEC website.</p> <p>13 Q Have you ever been an owner, manager, officer,</p> <p>14 director, employer, agent of any of the Neldon Johnson's</p> <p>15 companies?</p> <p>16 A No.</p> <p>17 Q Have you ever done any legal work for any of</p> <p>18 them?</p> <p>19 A No.</p> <p>20 Q Have you ever received any compensation from</p> <p>21 Neldon Johnson, his family members, or any of the</p> <p>22 companies associated with Neldon Johnson?</p> <p>23 A No.</p> <p>24 Q When did you first buy lenses?</p> <p>25 A I believe 2009.</p>	11
10	<p>1 Q And do you remember how many you bought in</p> <p>2 2009?</p> <p>3 A I don't remember the number of lenses. I</p> <p>4 think the purchase price was \$15,000.</p> <p>5 Q Have you made purchases since 2009?</p> <p>6 A Yes.</p> <p>7 Q How much total would you estimate that you</p> <p>8 have spent buying lenses?</p> <p>9 A I don't know an exact number. I would</p> <p>10 estimate \$80,000.</p> <p>11 Q And some of those were from IAS and some from</p> <p>12 Rapower?</p> <p>13 A Yes.</p> <p>14 Q Do you think any were from any other</p> <p>15 companies?</p> <p>16 A I don't think so.</p> <p>17 Q Did you recommend that others purchase lenses</p> <p>18 and receive commissions on the purchases by others?</p> <p>19 A No.</p> <p>20 Q When did you first meet Glenda Johnson?</p> <p>21 A I don't recall the first time I met her.</p> <p>22 Q Do you recall the circumstances?</p> <p>23 A My guess is that I would have met her either</p> <p>24 at the first -- I'll call it seminar that Neldon put</p> <p>25 together or on one of the first tours of the facilities,</p>	12
9	<p>1 would be my guess.</p> <p>2 Q And the seminar, was that at the Salt Palace?</p> <p>3 A No. The first seminar that I attended was in</p> <p>4 Lehi in a conference room near Thanksgiving Point.</p> <p>5 Q You also mentioned a site visit. Are these</p> <p>6 visits to one of the tower sites near Delta?</p> <p>7 A Yes.</p> <p>8 Q How many times have you been out for a site</p> <p>9 visit?</p> <p>10 A I would estimate four or five times per year</p> <p>11 until probably 2019 or whenever the property was taken</p> <p>12 by the receivership. I don't remember when that was</p> <p>13 done.</p> <p>14 Q Have you ever had any dealings with LaGrand</p> <p>15 Johnson?</p> <p>16 A I've met him maybe once or twice. But I don't</p> <p>17 know him.</p> <p>18 Q Have you ever had any agreements or contracts</p> <p>19 with him?</p> <p>20 A Not that I'm aware of.</p> <p>21 Q Any dealings with Randale Johnson?</p> <p>22 A I've met him but I don't know him well either.</p> <p>23 Q I'm giving you copies of a receivership order</p> <p>24 dated October 31st, 2018, and then the corrected</p> <p>25 receivership order dated November 1st, 2018, both in the</p>	11
10	<p>1 civil case 2:15-cv-828.</p> <p>2 Have you seen either of these before?</p> <p>3 A Yes.</p> <p>4 Q Do you recall which one?</p> <p>5 A No.</p> <p>6 Q Tell me when you believe you received a copy.</p> <p>7 A I don't believe I've ever received a copy.</p> <p>8 But I did at least once log onto the court website. I</p> <p>9 didn't read the entire document but I skimmed through</p> <p>10 it.</p> <p>11 Q And for your information, the corrected</p> <p>12 receivership order is identical to the original</p> <p>13 receivership order, it's just corrected for formatting</p> <p>14 errors, such as -- if you look through, the receivership</p> <p>15 order, the paragraph numbers are sometimes hard to find</p> <p>16 or missing.</p> <p>17 A Okay.</p> <p>18 Q Where has been solved with the corrected</p> <p>19 receivership order.</p> <p>20 So these are your copies to have so that --</p> <p>21 and I encourage you to read it because now that you are</p> <p>22 on notice of the order, you are subject to its terms.</p> <p>23 Have you -- I mean, handing you document be in</p> <p>24 444 from the case bought by the United States. Document</p> <p>25 444, which is the asset freeze order dated August 22,</p>	12

13	<p>1 2018. Do you recall whether or not you've ever been 2 given a copy of that? 3 A I do not. 4 Q Okay. And I'll put that in a pile of 5 documents for you to make sure that you are aware of it. 6 This is a copy of the initial order and injunction after 7 trial, Docket Number 413, dated June 22, 2018. And do 8 you recall whether or not you've read that? 9 A I do not. 10 Q Did you attend any of the trial by the United 11 States against Rapower and Neldon Johnson? 12 A I did. 13 Q Some, most, all? 14 A I only attended the part where I was a 15 witness. 16 Q And was that in April of 2018, does that sound 17 right? 18 A That sounds right. I don't know for sure. 19 Q Are you aware that in June of '18 the defense 20 was granted time to put on its defense and elected not 21 to put on witnesses. Are you aware of that? 22 A I am aware that they didn't put on witnesses, 23 yes. 24 Q And at the conclusion of that trial, which was 25 June 22nd, that Judge Nuffer issued some oral findings</p>	15	<p>1 but I think about two months ago her attorney asked me 2 to sign a statement. I knew it was regarding this 3 issue, but I didn't know she had been held in contempt. 4 I don't remember that. 5 Q Okay. And that's a copy that I will give to 6 you. 7 I'm handing you what's been marked as Receiver 8 Exhibit 2174, which is a notice of lien that is dated 9 August 14th, 2019, and recorded with the Millard County 10 Recorder on August 15th of 2019. 11 Have you ever seen this before? 12 A No. 13 Q Were you aware that -- strike that. 14 Have you -- how many different locations in 15 Delta have solar trees to your knowledge? 16 A I don't know how many different parcels they 17 are, but they're all close together in Delta. Some are 18 near a home. There some are a little distance away. 19 Q Are you aware of one cite that has about 15 20 solar trees that's sometimes called the research and 21 development site? 22 A Yes. 23 Q And then there's another site behind a home? 24 A Correct. 25 Q So have you been -- we'll call the first one</p>
14	<p>1 from the bench and then issued this written order on 2 that last day of trial. Were you aware of that? 3 A I'm not familiar with the details, but I do 4 know the trial ended. 5 Q And I'll put that in a pile for you. Are you 6 aware that Glenda Johnson was held in contempt in June 7 of 2018 for violating the receivership order? 8 A I was not. 9 Q Here is a copy of that order finding her in 10 contempt, which is Docket Number 701, dated June 25th, 11 2019. 12 Have you ever been given a copy of that order? 13 A I have not. 14 Q I will add that to your pile. Unfortunately 15 it's going to be a thick reading pile. 16 Are you aware that Glenda Johnson was held in 17 contempt a second time in July of 2020? 18 A No. 19 Q And I'm handing you a copy of that order, 20 Docket Number 947, dated July 6th of 2020. Did you have 21 any sense or hear from anyone that Glenda Johnson was 22 accused of or found in contempt of court for interfering 23 with the receivership's control over assets of the 24 receivership estate? 25 A I wasn't aware that she was held in contempt,</p>	16	<p>1 the R&D site. Have you been to that property? 2 A Yes. 3 Q Are you aware that that property was owned by 4 International Automated Systems? 5 A No. I didn't know who owned it. 6 Q Are you aware that the receiver took control 7 of that property and sold it at a public auction? 8 A I was not aware of it was sold. 9 Q I will -- have you seen this document 10 Exhibit 2174 before? 11 A The one in front of me? 12 Q Yes. 13 A No. 14 Q The third page of it says that the property is 15 parcel HD-4658-1. Do you recognize what the property is 16 based on that parcel number? 17 A No. 18 Q I'll represent to you that this property 19 relates to the R&D tower site. Were you aware that in 20 August of 2019 Glenda Johnson had filed a notice of lien 21 against the tower site? 22 A No. 23 Q If you look at Paragraph 4 of this notice of 24 lien, it says that labor and materials for which demand 25 and claim is made, was provided to or at the request of</p>

17	<p>1 International Automated Systems, Inc.</p> <p>2 Do you see that?</p> <p>3 A Yes.</p> <p>4 Q Do you know what position Glenda Johnson had</p> <p>5 at IAS?</p> <p>6 A I don't.</p> <p>7 Q Do you know what authority she had on behalf</p> <p>8 of IAS to file this notice of lien?</p> <p>9 A I do not.</p> <p>10 Q Do you have any knowledge of what labor or</p> <p>11 materials she provided on the property?</p> <p>12 A I believe it was the labor to erect the</p> <p>13 towers.</p> <p>14 Q And what role did Glenda Johnson have in</p> <p>15 erecting the towers?</p> <p>16 A My understanding is that she owned the company</p> <p>17 that was responsible for raising the towers with the</p> <p>18 construction contract.</p> <p>19 Q Do you know what the name of that company was?</p> <p>20 A I do not.</p> <p>21 Q And where did you get this understanding that</p> <p>22 her company was -- had a contractor to erect the towers?</p> <p>23 A She told me this around late fall of last</p> <p>24 year.</p> <p>25 Q 2019?</p>	19
18	<p>1 A Yes.</p> <p>2 Q Do you know if she provided \$9 million worth</p> <p>3 of labor and materials on the tower site?</p> <p>4 A I don't remember the exact figure but I know</p> <p>5 it was substantial.</p> <p>6 Q Do you know Roger Hamblin?</p> <p>7 A I know who he is.</p> <p>8 Q And when did you first hear of him?</p> <p>9 A I really don't know the first time I heard of</p> <p>10 him. I've only met him a few times.</p> <p>11 Q What's your first recollection of either when</p> <p>12 you first heard of him or talked with him?</p> <p>13 A I don't know when this would have been,</p> <p>14 probably soon after 2009. But I believe I was</p> <p>15 introduced to him on one of the tours of the facilities</p> <p>16 down there in Delta.</p> <p>17 Q Do you recall -- leaving aside having met him</p> <p>18 on one of the tours, do you recall when you next met him</p> <p>19 or talked with him?</p> <p>20 A Probably another tour, another one of the</p> <p>21 seminars is when I would have run into him again.</p> <p>22 Q Okay. Other than tours and seminars, have you</p> <p>23 ever spoken with Roger Hamblin?</p> <p>24 A I -- other than tours and seminars, I've</p> <p>25 spoken to him I think twice. Once -- I don't know if it</p>	20
19	<p>1 was a last month or the month before when Glenda's</p> <p>2 attorney asked me to meet with them to sign a written</p> <p>3 statement. And then either earlier this week or late</p> <p>4 last week I called him on the phone. So about the only</p> <p>5 times that I can remember meeting him outside of a tour</p> <p>6 or seminar.</p> <p>7 Q So did you call him last week?</p> <p>8 A I called him, yes.</p> <p>9 Q And what was the purpose of the call?</p> <p>10 A After I received the notice of this</p> <p>11 deposition, I called him to ask if he was also being</p> <p>12 deposed.</p> <p>13 Q What did he say?</p> <p>14 A He said yes.</p> <p>15 Q And how long was that conversation?</p> <p>16 A Maybe five minutes. It wasn't long.</p> <p>17 Q And what else did he say?</p> <p>18 A Not a lot. I had received also like an email</p> <p>19 for renewal of the company that was transferred from me</p> <p>20 to him and I didn't have his email address. So I</p> <p>21 forwarded it to Glenda and asked her to forward it on to</p> <p>22 Roger, so I asked him if he had received it. He said</p> <p>23 yes. That was about most of our conversation.</p> <p>24 Q Who else did you talk to about the notice of</p> <p>25 deposition?</p>	21

21	<p>1 Q Whose idea was it to form Anstram?</p> <p>2 A I think we both decided to form the company to</p> <p>3 acquire these rights.</p> <p>4 Q Whose idea was it to form the Nevis company?</p> <p>5 A I think Neldon suggested that it be formed in</p> <p>6 Nevis.</p> <p>7 Q A discussion you had with Neldon Johnson?</p> <p>8 A Yes. When I met with him, with Glenda, Neldon</p> <p>9 was also there.</p> <p>10 Q Well, then let's back up. I think you said</p> <p>11 that Glenda called you and asked if you would be</p> <p>12 interested in buying her rights for the property.</p> <p>13 Do I recall that right?</p> <p>14 A No. She didn't call me. I don't remember</p> <p>15 with -- I don't remember when we first discussed it.</p> <p>16 But we arranged a meeting to meet -- I believe we met at</p> <p>17 his attorney's office in -- I think it was in Midvale,</p> <p>18 it might be Sandy, and both Glenda and Neldon were</p> <p>19 there.</p> <p>20 Q Who else was there?</p> <p>21 A The only person I remember was Neldon's</p> <p>22 attorney was there.</p> <p>23 Q Steven Paul, Denver Snuffer?</p> <p>24 A Denver Snuffer.</p> <p>25 Q Do you recall when that meeting was?</p>	23
22	<p>1 A I don't. But it would have been in the fall,</p> <p>2 late fall last year.</p> <p>3 Q Approximately how far in advance of when</p> <p>4 Anstram was formed?</p> <p>5 A At least a month.</p> <p>6 Q Have you ever formed a company in Nevis</p> <p>7 before?</p> <p>8 A I have not.</p> <p>9 Q How did you know how to form a Nevis company?</p> <p>10 A I looked it up on the internet.</p> <p>11 Q Did Neldon Snuffer help you form the company?</p> <p>12 A No.</p> <p>13 Q Have you ever been to Nevis?</p> <p>14 A No.</p> <p>15 Q How did you select a register agent?</p> <p>16 A I just found them on the internet.</p> <p>17 Q I'm handing you what's been marked as Receiver</p> <p>18 Exhibit 2175, which is eight pages of documents, with</p> <p>19 the first page on the letterhead of Nevis Island</p> <p>20 Administration, Ministry of Finance, Statistics and</p> <p>21 Economic Planning.</p> <p>22 If you'd look through this and tell me which</p> <p>23 of the pages in this document you've seen before.</p> <p>24 The first page is dated June 16, 2020, as it</p> <p>25 is a letter addressed to me. And then the other pages</p>	24
21	<p>1 are corporate documents from the files of the --</p> <p>2 A I have seen all of the corporate documents.</p> <p>3 Obviously I haven't seen this first page before.</p> <p>4 Q So pages 2 through 8 --</p> <p>5 A Yes.</p> <p>6 Q -- you've seen before?</p> <p>7 A I have, yes.</p> <p>8 Q And where did you get copies of these?</p> <p>9 A I received these copies from the company that</p> <p>10 I contacted to form Anstram Energy.</p> <p>11 Q Do you recall the name of that company?</p> <p>12 A No. I could find out. I don't remember.</p> <p>13 Q Would it be Prestige Trust Company?</p> <p>14 A No. That wasn't the name of the company.</p> <p>15 Q Was it a law firm in Nevis?</p> <p>16 A No. I think it's a company in -- I think</p> <p>17 they're in San Diego. I think they form entities in</p> <p>18 various jurisdictions.</p> <p>19 Q How is the name Anstram Energy selected?</p> <p>20 A That was in that meeting -- I'm trying to</p> <p>21 recall if either Neldon or Glenda suggested the name.</p> <p>22 Q What does it mean?</p> <p>23 A I don't know.</p> <p>24 Q Nelson formed another company called Anstrum</p> <p>25 Energy, A-N-S-T-R-U-M. Are you aware of that?</p>	23
22	<p>1 A I became aware of that the first time during</p> <p>2 my tax court trial. It was brought up by the IRS</p> <p>3 counsel. Before that I hadn't heard of them before</p> <p>4 that.</p> <p>5 Q Do you know if the two companies are related?</p> <p>6 A I know this is unrelated. I formed the</p> <p>7 Anstram Energy, LLC. I don't know anything about the</p> <p>8 other company.</p> <p>9 Q The fourth, fifth, and six pages of this</p> <p>10 Exhibit 2175 say they are the articles of organization.</p> <p>11 Do you see that?</p> <p>12 A Yes.</p> <p>13 Q Did you draft these?</p> <p>14 A I did not.</p> <p>15 Q Do you know who did?</p> <p>16 A I don't know who drafted them other than the</p> <p>17 company that I contacted to form the company.</p> <p>18 Q Did you review them before they were filed?</p> <p>19 A I did not.</p> <p>20 Q Paragraph 5 under the articles of organization</p> <p>21 says, "The company shall engage in buying and sales of</p> <p>22 real estate." Did you ask that that paragraph be</p> <p>23 included?</p> <p>24 A No.</p> <p>25 Q Did you see this before it was actually filed?</p>	24

25	<p>1 A No.</p> <p>2 Q Has Anstram ever owned any real estate?</p> <p>3 A I don't think so.</p> <p>4 Q Do you know of any corporate document for</p> <p>5 Anstram other than these?</p> <p>6 A I'm not aware of any others.</p> <p>7 Q Are you aware, for example, of whether or not</p> <p>8 there's an operating agreement?</p> <p>9 A Not that I'm aware of.</p> <p>10 Q Is there a contract with a registered agent?</p> <p>11 A I don't -- there may be. I don't know if</p> <p>12 there's a written contract or if it was just part of the</p> <p>13 agreement with the company in -- I don't think there is.</p> <p>14 Q Do you have any other documents relating to</p> <p>15 Anstram Energy other than these?</p> <p>16 A I don't know. I could look, but not that I'm</p> <p>17 aware of.</p> <p>18 Q If you would look and give them to me I would</p> <p>19 appreciate that.</p> <p>20 A Sure. Let me make a note of that.</p> <p>21 Q Did you give copies of corporate documents to</p> <p>22 anybody else?</p> <p>23 A I gave them to Glenda.</p> <p>24 Q And when was that?</p> <p>25 A Probably within a few days after I received</p>	27
26	<p>1 them, which I think is around the time the company was</p> <p>2 formed.</p> <p>3 Q And was that November 25th of 2019?</p> <p>4 A Yes.</p> <p>5 Q Did you give copy of the corporate documents</p> <p>6 to Roger Hamblin?</p> <p>7 A I did not.</p> <p>8 Q What were the costs involved in forming</p> <p>9 Anstram?</p> <p>10 A I think it costs around -- I would guess</p> <p>11 around \$3,500.</p> <p>12 Q Does that include a filing fee or is that</p> <p>13 separate?</p> <p>14 A I think that's the entire cost.</p> <p>15 Q Does that also include the register agent</p> <p>16 fees?</p> <p>17 A I believe so.</p> <p>18 Q And the preparation of the company documents?</p> <p>19 A I think so. I'm happy to go back and review.</p> <p>20 I think that's correct.</p> <p>21 Q And who paid those fees?</p> <p>22 A Glenda paid the fees.</p> <p>23 Q Do you know how she paid them?</p> <p>24 A She gave me her credit card.</p> <p>25 Q So when Anstram was formed in November of</p>	28
	<p>1 2019, who were the managers of Anstram?</p> <p>2 A There was only a single member when it was</p> <p>3 formed. That was myself.</p> <p>4 Q And is it member managed or manager managed?</p> <p>5 A I believe it's member managed.</p> <p>6 Q Did you ever have any other members while you</p> <p>7 owned it?</p> <p>8 A No.</p> <p>9 Q Did it ever have any employees when you</p> <p>10 controlled it?</p> <p>11 A Yes. Glenda was made an employee.</p> <p>12 Q And when did she become an employee?</p> <p>13 A I don't remember exactly. It would have been</p> <p>14 soon after it was formed.</p> <p>15 Q What were her roles as an employee?</p> <p>16 A Well, the company never -- I mean, I wasn't in</p> <p>17 charge of the company long enough to really define</p> <p>18 roles. But I thought she would help facilitate the</p> <p>19 transfer of her contractual rights into the new company</p> <p>20 and that she would assist in continuing the development</p> <p>21 of the technology.</p> <p>22 Q And did you have that discussion with her?</p> <p>23 A Yes.</p> <p>24 Q What else did your discussion with her entail</p> <p>25 about her role in the company?</p>	
	<p>1 A I don't remember anything else specifically</p> <p>2 about her role other than she was to be paid for her</p> <p>3 transfer of those rights by the development of projects</p> <p>4 and then assigning those projects to her.</p> <p>5 Q How much would she be paid?</p> <p>6 A I don't remember the exact amount, but I</p> <p>7 think -- my mind, I think it was around \$50 million. I</p> <p>8 don't remember the exact amount.</p> <p>9 Q And are there any written documents relating</p> <p>10 to her employment as an employee of Anstram?</p> <p>11 A Yes.</p> <p>12 Q What documents are there?</p> <p>13 A There was an employment agreement that I</p> <p>14 signed.</p> <p>15 Q Do you have a copy of that?</p> <p>16 A I do not.</p> <p>17 Q But you signed it on behalf of Anstram?</p> <p>18 A Yes.</p> <p>19 Q And so does Glenda -- did Glenda take a copy</p> <p>20 of that?</p> <p>21 A Yes.</p> <p>22 Q Was it handwritten or typewritten?</p> <p>23 A I believe it was typewritten.</p> <p>24 Q Who created it?</p> <p>25 A I think Glenda created it but I'm not sure.</p>	

29	<p>1 Q Did she email it to you?</p> <p>2 A No.</p> <p>3 Q I'm trying to figure out if you might have a</p> <p>4 copy either.</p> <p>5 A I don't. I don't have an electronic copy. We</p> <p>6 met a few more times at her attorney's office and</p> <p>7 actually once in the home to review documents to sign a</p> <p>8 few documents, and that was one of the documents.</p> <p>9 Q What other documents?</p> <p>10 A I briefly reviewed the documents that gave</p> <p>11 Glenda the rights to construct the technology.</p> <p>12 Q Were these rights from Anstram or is this</p> <p>13 something that existed previously?</p> <p>14 A Something that existed previously. These were</p> <p>15 the contracts that were being transferred to Anstram.</p> <p>16 Q Okay. What else?</p> <p>17 A There were some agreements showing that Neldon</p> <p>18 had -- or one of his entities, I suppose, had assigned</p> <p>19 Glenda some of the intellectual property years ago and</p> <p>20 that that would be acquired by Anstram.</p> <p>21 Q Do you have a copy of that?</p> <p>22 A I do not.</p> <p>23 Q Did you sign that document?</p> <p>24 A No. This was a document -- these were</p> <p>25 documents that I reviewed that were -- I guess you could</p>	31	<p>1 A No.</p> <p>2 Q Has that changed since November of 2019?</p> <p>3 A Yes. Sometime in the spring of this year I</p> <p>4 transferred the company to Roger -- I don't know if it's</p> <p>5 Hamblin or HamLin.</p> <p>6 Q What's your current authority to act on behalf</p> <p>7 of Anstram?</p> <p>8 A I don't believe I have any currently.</p> <p>9 Q So during the time that you owned Anstram,</p> <p>10 what were its assets?</p> <p>11 A Primarily I thought the important assets were</p> <p>12 the agreements that were Glenda's to construct the</p> <p>13 project and also any intellectual property that Glenda</p> <p>14 had acquired. Those were the primary assets.</p> <p>15 Q So you recall seeing a document whereby Neldon</p> <p>16 had granted Glenda intellectual property rights to the</p> <p>17 technology?</p> <p>18 A Yes.</p> <p>19 Q And did Glenda assign those to Anstram Energy?</p> <p>20 A Yes.</p> <p>21 Q Is there a document reflecting that she</p> <p>22 assigned those intellectual property rights to Anstram?</p> <p>23 A There is.</p> <p>24 Q Do you have a copy of that?</p> <p>25 A I don't.</p>
30	<p>1 say were assets of the Glenda that she had acquired and</p> <p>2 was transferring them to Anstram.</p> <p>3 Q So you were owner and manager of Anstram but</p> <p>4 you didn't get copies of these documents?</p> <p>5 A Glenda kept them. I guess that would be one</p> <p>6 of her roles as the employee.</p> <p>7 Q But you did not get a copy?</p> <p>8 A No.</p> <p>9 Q Any other documents?</p> <p>10 A There were a few mechanics' liens and Glenda</p> <p>11 explained that work had been done and was owing to her</p> <p>12 and then that -- those rights would be transferred to</p> <p>13 Anstram and that a mechanic's lien would be necessary to</p> <p>14 possibly enforce those rights in the future.</p> <p>15 Q What authority did Glenda have to act on</p> <p>16 behalf of Anstram Energy?</p> <p>17 A Other than employees, that was her role.</p> <p>18 Q As an employee, what kind of authority did she</p> <p>19 have? Could she bind Anstram Energy to contracts?</p> <p>20 A No. She couldn't sign contracts. She was</p> <p>21 only an employee.</p> <p>22 Q So from the formation of Anstram in November</p> <p>23 of 2019 until you transferred it, was there anyone other</p> <p>24 than you who had authority to act on behalf of Anstram</p> <p>25 Energy?</p>	32	<p>1 Q Do you know if that was recorded with the U.S.</p> <p>2 Patent Office?</p> <p>3 A I don't believe it was.</p> <p>4 Q Was there any discussion about whether or not</p> <p>5 it should be recorded with the patent office?</p> <p>6 A No.</p> <p>7 Q To your knowledge, if patent rights are</p> <p>8 assigned, do they need to be registered -- does the</p> <p>9 assignment need to be registered with the patent office?</p> <p>10 A I wasn't aware of that.</p> <p>11 Q I meant it as a question.</p> <p>12 A I don't -- I don't know. I'm not aware of</p> <p>13 that. I thought it could actually be done just by</p> <p>14 contract. I didn't know that.</p> <p>15 Q I'm not -- I'm not representing to you what</p> <p>16 the patent law is on that. I'm just trying to explore</p> <p>17 your understanding.</p> <p>18 What was the financial condition of Anstram</p> <p>19 when you had control of it?</p> <p>20 A It didn't have -- it didn't have any bank</p> <p>21 accounts opened or anything at the time I assigned it,</p> <p>22 didn't have any.</p> <p>23 Q Did it have any money?</p> <p>24 A No.</p> <p>25 Q Did it have any assets other than the</p>

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1 agreements you've discussed?
2 **A No.**
3 Q Did it have any liabilities?
4 **A Not that I'm aware of.**
5 Q And what business did it conduct between
6 November when you formed it and in the spring when you
7 transferred it?
8 **A I don't think it conducted any.**
9 Q What experience does Anstram have in the
10 energy industry?
11 **A The only experience it would have had would**
12 **have been through Glenda and her experience in**
13 **developing energy and developing the technology.**
14 Q And what do you understand her experience to
15 be with regards to solar technology?
16 **A I believe she has worked with Neldon and her**
17 **sons over the last decade plus on developing this**
18 **technology, but I don't know her particular knowledge.**
19 Q To your knowledge, does she have any skills in
20 developing this technology or simply as observing what
21 Neldon and his sons have been doing?
22 **A I think primarily observing. I think that**
23 **Neldon and his sons are the ones with the -- with the**
24 **technical knowledge.**
25 Q Has anybody ever said anything to you stating

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1 or implying that Glenda had technical skills or a role
2 in developing the technology?
3 **A No.**
4 Q Do you have anything to indicate to you that
5 she does have set skills?
6 **A No. I believe the skills are primarily with**
7 **Neldon and his sons.**
8 Q How many other energy projects has Anstram
9 Energy done?
10 **A None.**
11 Q I'm handing you what's been previously marked
12 as Plaintiff Exhibit 973. This is six pages of an
13 excerpt of testimony from the United States Tax Court in
14 on February 3rd of 2020.
15 **A Yes.**
16 Q Have you read that transcript?
17 **A Yes.**
18 Q So you're familiar with the tax court
19 proceedings?
20 **A I am, yes.**
21 Q On page 309, line 5. Is this where I
22 discussed Glenda Johnson being an employee of Anstram
23 Energy?
24 **A Yes.**
25 Q During the time that she was your employee,

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1 was she paid any amount?
2 **A No.**
3 Q Was she a W-2 employee?
4 **A No. The company didn't have any cash flow to**
5 **pay salaries yet.**
6 Q On page 309, Lines 11 through 13, it
7 discusses that -- it says: I'm trying to continue the
8 technology in some lawful way. Do you see that?
9 **A Yes.**
10 Q What did you mean by that?
11 **A I think I meant that I believe the technology**
12 **could be viable and very beneficial. And this appeared**
13 **to be a possible way to continue developing the**
14 **technology but without of course doing anything that**
15 **would have been prohibited by the courts already. I**
16 **think that's what I meant by this.**
17 Q So what assets or resources would Anstram
18 Energy need in order to continue developing the solar
19 technology?
20 **A We'd need to raise capital.**
21 Q What else would you need, solar lenses?
22 **A I think it would need -- I think primarily it**
23 **would need the heat exchanging technology and the**
24 **turbine technology.**
25 Q Would you need solar lenses?

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1 **A I don't know if it would need the solar**
2 **lenses, depending on whether we would done a project**
3 **that used solar power or one that used more conventional**
4 **fuels.**
5 Q Would you need patents or licensing rights?
6 **A Yes.**
7 Q Did Anstram raise any capital while you owned
8 it?
9 **A No.**
10 Q Did Anstram own the heating exchange
11 technology?
12 **A I thought it owned some of these technologies**
13 **through Glenda's assignment.**
14 Q Did you -- do you have a recollection of
15 whether or not Glenda had rights to the heat exchanger
16 technology?
17 **A I thought she did.**
18 Q Do you believe that Glenn had rights to the
19 turbine technology?
20 **A I thought that she did, yes.**
21 Q Have you -- to your knowledge, has a
22 turbine -- working turbine been created?
23 **A Yes.**
24 Q Have you seen it?
25 **A I have.**

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1 Q Where did you see it?
2 A I've seen it in Delta. Twice I've seen it
3 running.
4 Q And it's -- are you saying it's your
5 understanding that all the rights to the turbine were
6 assigned to Glenda and that she assigned them to
7 Anstram?
8 A That was my understanding, yes.
9 Q Have you seen a turbine that Nelson Johnson
10 had constructed in 2019?
11 A I think so, yes.
12 Q Created inside of a shipping container?
13 A I've seen the one in the shipping container
14 and then I saw a newer version. It was in a machine
15 shop I think in -- I want to say West Valley.
16 Q Kitco Iron?
17 A I don't know the name of it.
18 Q So where -- let's take the first one, the one
19 the container. Where did you see that?
20 A That one I saw in Delta. Or I don't know if
21 it's technically Delta. To the west of Delta.
22 Q And then the newer one, when did you see that?
23 A Sometime in 2019. I don't recall exactly
24 when.
25 Q And you saw that at the machine shop?

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1 A Yes.
2 Q Was it completed?
3 A It looked like it.
4 Q And do you know where that machine is now?
5 A I do not.
6 Q Do you believe that machine is an asset of
7 Anstram Energy?
8 A I don't know if that particular machine is.
9 Q Do you know what money was used to build that
10 machine?
11 A No.
12 Q Do you know whether that machine was built
13 after the receivership order was entered?
14 A I don't know. I assume it was built in 2019
15 if it was in the machine shop, but I don't know.
16 Q If the receivership order was entered in
17 October of 2018 and the asset freeze in August of 2018,
18 did you give any consideration or have you heard anyone
19 talk about how funding was obtained to continue
20 development of the turbine?
21 A I don't know how they funded that.
22 Q Did you ever wonder where the money came from
23 to keep working on the turbine?
24 A No.
25 Q When you talked about Anstram intending to

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1 continue to develop the technology in some lawful way,
2 did you mean just solar technology, or do you mean more
3 than solar technology?
4 A More than solar technology.
5 Q What else besides solar technology?
6 A Well, the development of the turbine and heat
7 exchangers using the more conventional fuel source,
8 natural gas.
9 Q Would you need -- would Anstram need access to
10 any of the real properties that had been used by Rapower
11 or IAS?
12 A I think it would be helpful, but I don't know
13 if it was necessary.
14 Q Do you know if Anstram had rights to any of
15 those properties?
16 A No.
17 Q No, it didn't or no, you don't know?
18 A No. I don't believe it does have rights to
19 those properties.
20 Q Did you expect that properties for which
21 Glenda recorded a mechanic's lien would be needed by
22 Anstram Energy in order to continue developing any of
23 the technology?
24 A I don't believe the properties were necessary.
25 Q Okay. On page 309, again Lines 21, 22.

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1 A Okay. 309.
2 Q In fact, starting at Line 16, it discusses
3 lien, a lien. Do you see that?
4 A Yes.
5 Q And then the question is asking you about the
6 purpose of the lien. And then your answer is that I
7 think there is money owed back to this entity for work
8 that's been done on those properties.
9 Do you see that?
10 A Yes.
11 Q When you say "money owed back to this entity,"
12 what entity are you talking about there?
13 A Anstram Energy.
14 Q So your testimony in your tax court trial was
15 that money was owed to Anstram Energy?
16 A Yes.
17 Q What money is owed -- did you think was owed
18 to Anstram Energy?
19 A I thought money was owed through Glenda's
20 assignment of her contracts and rights to Anstram.
21 Q And what work was done that resulted in money
22 being owed to Anstram?
23 A I thought it was the construction of the
24 towers.
25 Q And so how much did you think was owed to

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1 Anstram Energy?
2 **A I think the contract was a significant number.**
3 **I don't remember the exact amount.**
4 Q Are you talking a million, 10 million,
5 50 million?
6 **A I don't remember.**
7 Q Look on page 308.
8 **A Okay.**
9 Q Line 20. There's a reference there to
10 50 million. Is that the amount that you think is owed
11 to Anstram?
12 **A I think this is a reference, if I'm not**
13 **incorrect, to the amount that was to be paid to Glenda**
14 **for the assignment of her assets.**
15 Q Okay. So the amount that's owed to Anstram is
16 whatever was owed to Glenda for construction of the
17 towers?
18 **A Yes.**
19 Q And you think that was a lot but you don't
20 remember how much?
21 **A I don't remember.**
22 Q Do you think it was over a million?
23 **A Yes.**
24 Q Over 10?
25 **A Yes.**

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1 Q Who is it that you think owed that money to
2 Glenda Johnson?
3 **A I thought it was International Automated**
4 **Systems.**
5 Q And so at the time that Anstram was created in
6 November of 2019, how could Glenda -- what was Glenda's
7 right to expect IAS to pay her that money?
8 **A I thought that she -- her company had done**
9 **work on the site and was owed that money for the work.**
10 Q In November of 2019 were you aware that IAS
11 had been placed into receivership?
12 **A Yes.**
13 Q Were you aware that IAS would not have an
14 obligation to pay any money to Glenda Johnson except by
15 court order?
16 **A No.**
17 Q So was it your understanding that even though
18 IAS was in receivership, that Glenda Johnson still could
19 recover 10 million or more from IAS?
20 **A Yes.**
21 Q And where did you get that expectation from?
22 **A I just thought that that was money that had**
23 **been owed under the contracts. It was still owing.**
24 Q Did you believe that that money would have to
25 be paid even though IAS was in receivership?

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1 **A Yes.**
2 Q Did you read the portion receivership order
3 stating that all assets of IAS were under the exclusive
4 control of the receiver?
5 **A I don't think I read the receivership order.**
6 Q Were you aware that the receivership order has
7 a section talking about priority of payment of monies
8 recovered by the receiver?
9 **A No.**
10 Q So then why did you think that Glenda Johnson
11 would still be able to get the 10 million or more from
12 IAS even after the receivership was created?
13 **A I thought that -- I honestly thought they had**
14 **to honor contracts that had been made before the**
15 **receivership was appointed.**
16 Q And that expectation was without reading the
17 receivership order, correct?
18 **A Yes.**
19 Q When it talks about the monies owed to Anstram
20 for the work that's been done on the property, was it
21 IAS money that had built those towers?
22 **A I don't know what been money had built the**
23 **towers.**
24 Q Do you know if Neldon Johnson used his own
25 money to build those towers?

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1 **A I don't know.**
2 Q Do you know whose money who paid for the work?
3 **A I do not.**
4 MR. KLEIN: Let's go off the record.
5 (Off-record discussion.)
6 BY MR. KLEIN:
7 Q I'm handing you what's been marked as receiver
8 Exhibit 2205. Do you recognize this document?
9 **A Yes.**
10 Q What is it?
11 **A It is a declaration from myself.**
12 Q And this has -- is Document Number 937-3 filed
13 June 10th of 2020.
14 Is that your signature on the third page of
15 this document?
16 **A Yes.**
17 Q And is everything in this declaration
18 accurate?
19 **A I believe it is.**
20 Q Since signing it have you discovered anything
21 that makes you question the accuracy of what you signed?
22 **A I believe this is accurate.**
23 Q How did you come to sign this declaration?
24 **A I was contacted by Glenda's attorney.**
25 Q Denver Snuffer or Steven Paul?

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1 A I don't remember which one. I don't think it
2 was Denver.
3 Q Was it a phone call or an email?
4 A A phone call.
5 Q What did he say? Sorry. Let me interrupt.
6 A Sorry.
7 Q Has Steven Paul ever represented you as your
8 attorney?
9 A No.
10 Q What did he say when he called you?
11 A He asked me if I could come by his office and
12 sign a declaration.
13 Q And did he explain what the declaration was
14 about or why you needed to sign a declaration?
15 A He explained that it was regarding the
16 transfer of assets to Anstram Energy and the recording
17 of liens on real estate.
18 Q And did it surprise you to get that call from
19 him?
20 A A little bit. I didn't think I would have to
21 sign anything.
22 Q Did he explain any of the things that were
23 happening that had created the need for your
24 declaration?
25 A I'm sure he did. I don't recall exactly what

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1 he explained. But I'm sure he did at the time.
2 Q Did you draft this declaration?
3 A I did not.
4 Q When did you first see it?
5 A When I went to the office of Snuffer.
6 Q Denver -- or Nelson Snuffer?
7 A Yes.
8 Q Did you -- so you weren't emailed a copy of it
9 in advance?
10 A I don't think so.
11 Q Did you tell Steven Paul what information you
12 recall so that they could put it in the declaration?
13 A Yes. He had already prepared a draft. And
14 when I arrived, I asked him to make a few changes, which
15 he did.
16 Q Before you arrived, had you told him any
17 information that you would like included in the
18 declaration?
19 A I don't think so.
20 Q When you arrived at Nelson Snuffer, he showed
21 you a draft, you read it and identified some changes you
22 would like made, correct?
23 A Correct.
24 Q Do you recall what those changes were?
25 A I don't remember exactly the changes, but I

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1 think had quite a few to correct what I remember being
2 the events that happened. But I don't remember exactly
3 what they were, but I don't know. I helped him draft
4 the final version.
5 Q When you went to Nelson Snuffer and were given
6 this draft, who else was there?
7 A When I was given the draft, I was sitting in
8 the waiting area. And I met with I believe Steven Paul
9 and discussed changes to the draft that he had created.
10 Q There in the waiting area?
11 A Yeah. And then Steven came out, gave me the
12 revised draft to review. And then I think I signed it
13 at that time. And then he asked if I would like to talk
14 to Neldon or Glenda and said that they were there as
15 well. They were in a conference room in the back of the
16 office. So I went back there and asked Neldon basically
17 how he was doing. And Roger Hamblin was there as well.
18 Q You're in the conference room? Hamblin was in
19 the conference room?
20 A Yes.
21 Q So how long was your discussion with Neldon
22 and Glenda?
23 A Probably 10 or 15 minutes.
24 Q And what else was discussed in that
25 conversation?

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1 A I think I asked him how -- if he had made any
2 progress on any of the things he was working on,
3 particularly the -- he had discussed a concentrated
4 photovoltaic tank. And I asked him how that was coming.
5 He had showed me that previously.
6 Q Was it your understanding he was still working
7 on that?
8 A Yes.
9 Q And where did you get that understanding?
10 A Well, the one time I went down to his house to
11 review documents, he had a model, I guess I would say,
12 in his garage which he showed me.
13 Q And when was that that you went to his house?
14 Would that have been before the trial or after the
15 trial?
16 A It was before the trial.
17 Q Okay. So what made you think that in spring
18 of this year Neldon was still working on the
19 photovoltaic system?
20 A I thought he would still be working on it
21 since it was in his garage. It was something he was
22 passionate about.
23 Q Did you have any understanding about whether
24 or not the receivership order and the asset freeze would
25 have prevented Neldon from continuing work on these

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1 projects?
2 **A No.**
3 Q I would urge you to read the receivership
4 order. The corrected receivership order is the better
5 one to read.
6 **A Okay.**
7 Q What other -- what else do you remember from
8 that discussion?
9 **A Not much.**
10 Q Was there any discussion with Neldon or Glenda
11 or Steven Paul about why your declaration was needed?
12 **A No, not in the -- not that I remember. I'm**
13 **sure that he did tell me on the telephone before he got**
14 **there that it was needed for --**
15 Q When you say "he," do you mean Steven Paul?
16 **A Yes. I think Steven Paul is the one who**
17 **called me, but I don't remember -- I honestly don't**
18 **remember the specifics of why it was needed.**
19 Q Okay. Looking at your declaration. In
20 Paragraph 2 --
21 **A Yes.**
22 Q -- it says, In approximately of 2019 you were
23 contacted by Glenda Johnson explaining she was
24 interested in selling whatever rights she had.
25 And you talked about that earlier. So I want

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1 to see whether this helps refresh your recollection
2 about how that contact first occurred.
3 **A I think the -- I think the very first contact**
4 **was either Neldon or Glenda called me on the phone and**
5 **asked me if I wanted to meet at their attorney's office**
6 **to discuss possibly moving forward with the technology**
7 **and acquiring Glenda's rights. And I said I would be**
8 **happy to meet with them.**
9 Q Do you recall whether it was Neldon or Glenda?
10 **A I don't.**
11 Q Did that contact surprise you that somebody
12 was -- that they were interested in selling the
13 technology?
14 **A Yeah, it did actually. I wasn't aware that**
15 **they were -- one, I didn't know that Glenda had rights**
16 **and contracts that she had in her own possession. And I**
17 **didn't know they were looking to transfer them to**
18 **another entity.**
19 Q Why do you think Neldon or Glenda contacted
20 you?
21 **A I don't know, other than I had been closely**
22 **following the technology for at least 10 years by then.**
23 **And I had been down to talk with Neldon many times about**
24 **progress of the technology. I would assume I was one of**
25 **the people who most frequently visited the site to see**

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1 **how things were happening. That would be my guess.**
2 Q Was there any discussion about what was
3 prompting their desire to sell?
4 **A No, other than they wanted to see if we could**
5 **continue to develop the technology and generate some**
6 **revenues for all of us.**
7 Q So the time of this call would have been
8 November of 2019, right?
9 **A It could have been October. It was**
10 **approximately that time.**
11 Q But the time of this call, you're aware the
12 receivership order had been entered, right?
13 **A Yes.**
14 Q The trial had concluded, right?
15 **A Yes.**
16 Q And the trial was unfavorable to Neldon and
17 IAS and Rapower, right?
18 **A Yes. I don't know if the -- if the appeal had**
19 **been decided yet, but yes, I knew the trial court was**
20 **unfavorable.**
21 Q And was it your understanding that as a result
22 of the receivership order that all assets of IAS,
23 Rapower, and Neldon Johnson were under the control of
24 the receiver?
25 **A Yes.**

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1 Q So what did you think that -- how did you
2 anticipate that technological development could still
3 occur?
4 **A I thought that some of the technology,**
5 **intellectual property, belonged to Glenda. And I didn't**
6 **think she was subject to the receivership.**
7 Q So let me try and summarize and you tell me
8 whether or not it is a fair summary. So the time this
9 discussion either October or November of 2019, you knew
10 that trial had ended, a receiver had been appointed, and
11 a receiver had control of all of the company assets and
12 Neldon's assets. But you thought that Glenda had rights
13 to the technology that were not subject to the
14 receivership entity and could still be developed?
15 **A That's correct.**
16 Q Did Neldon or Glenda say something to you to
17 give you that impression?
18 **A Yes.**
19 Q What do you recall being told to you?
20 **A More or less exactly what you just summarized.**
21 Q And who told you that?
22 **A Probably both of them when we met.**
23 Q Do you recall whether Steven Paul gave you the
24 same impression?
25 **A I don't think Steven Paul was at that meeting.**

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1 Q And where was this meeting?
2 A **It was at the law offices.**
3 Q So it was at Nelson Snuffer's law offices?
4 A **Yes.**
5 Q But just between you and Neldon and Glenda?
6 A **Yes.**
7 Q And this was in either October or November of
8 2019?
9 A **Yes.**
10 Q So in Paragraph 2 it talks about -- in your
11 declaration, it talks about Glenda being interested in
12 selling rights, title, or interest she held in the
13 business, contracts and assets.
14 Does this help you remember anymore about what
15 you thought she owned than what we talked about earlier?
16 A **No.**
17 Q And what did you believe was the value of the
18 rights, title, and interest that Glenda Johnson had?
19 A **I believe that they had enormous value if they**
20 **could be used to complete the technology and build**
21 **operating power plants. I thought they were worth**
22 **hundreds of millions of dollars.**
23 Q And so did you form Anstram Energy to then
24 hold these assets that you were going to acquire?
25 A **Yes.**

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1 Q And how much did Anstram Energy pay Glenda
2 Johnson for her rights to this technology?
3 A **I think the amount was -- I don't remember the**
4 **contractual amount. I think it was \$50 million to be**
5 **paid in the future after projects were developed.**
6 Q Was any money paid at the time?
7 A **No.**
8 Q And so Anstram Energy would acquire the
9 technology. And then was it your understanding that
10 Glenda would continue to develop it on behalf of Anstram
11 Energy?
12 A **I didn't know if Glenda would continue to**
13 **develop it. But I thought we could raise capital and**
14 **find engineers and people who could develop it.**
15 Q But the development was going to occur under
16 the name of Anstram Energy, correct?
17 A **Yes.**
18 Q And were you going to be spearheading that
19 effort?
20 A **Yes.**
21 Q So did you have a business plan for how you
22 were going to develop this property or the technology?
23 A **No.**
24 Q How did you anticipate the development was
25 going to occur?

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1 A **Well, I thought that we would need to develop**
2 **a business plan, raise capital, and then finish the**
3 **technology and build projects.**
4 Q Where did you anticipate the capital would be
5 raised from?
6 A **I thought they would have to approach -- I**
7 **thought that we would need probably to approach private**
8 **investors to finish development of the technology. And**
9 **then hopefully once it was developed we could get**
10 **funding from sources that would be interested in**
11 **partnering with the project's development.**
12 I mostly hadn't thought it all the way through
13 and then the entity was transferred -- I transferred it
14 away. And I didn't really complete thinking about it.
15 Q You were the sole owner of Anstram initially
16 and you now have what you think is a 50 million-dollar
17 asset, correct?
18 A **Yes.**
19 Q And you planned then to further develop that
20 technology because you had an obligation to repay Glenda
21 \$50 million, right?
22 A **Yes.**
23 Q I'm trying to understand your thought process
24 about how you were going to accomplish that.
25 A **I think I just told you.**

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1 Q Do you have experience in approaching
2 investors and asking them for money to help fund
3 alternative energy development?
4 A **I have some. None of them are successful.**
5 Q How were you planning on approaching the
6 investors or finding investors?
7 A **I thought that we could put a business plan**
8 **together and take it to different venture capital firms.**
9 Q So it was venture capital firms that you were
10 anticipating approaching?
11 A **I don't know. That would have been one of the**
12 **people we would approach.**
13 Q Was any work done on preparing a business
14 plan?
15 A **No.**
16 Q Was that something you would have done or you
17 would have had Glenda do it?
18 A **I would have done it with Glenda's help, of**
19 **course.**
20 Q And when you talk about Glenda being the
21 employee and responsible for sort of implementation of
22 the company's plan, was it your anticipation that Glenda
23 would be doing it herself or that she would be doing it
24 under direction from Neldon?
25 A **I don't know if she would be doing under**

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1 direction from Neldon, but I assumed he would be
2 involved.
3 Q So Paragraph 3 of your declaration you say --
4 indicate you were interested and you set up in a
5 meeting. How much time elapsed between the first
6 contact and the actual meeting?
7 A **Probably just a few days.**
8 Q And the meeting was with Nelson Snuffer,
9 right?
10 A **Yes.**
11 Q And I'm trying to place when that meeting was.
12 Do you have a sense of how much time elapsed between
13 that meeting and when you actually formed Anstram?
14 A **At least a month.**
15 Q You're estimating that meeting would have
16 taken place in October?
17 A **I am now.**
18 Q And did you make any notes or create any other
19 documents relating to that meeting at Nelson Snuffer?
20 A **I would have created notes, yes.**
21 Q Would you still have those notes?
22 A **Maybe.**
23 Q Would you check and --
24 A **Sure.**
25 Q -- if so send them to me?

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1 After that first meeting, which you think was
2 in October with Nelson Snuffer at Nelson Snuffer, did
3 you have any other meetings with Glenda before you
4 actually formed Anstram?
5 A **I know we met two or three more times, but I**
6 **don't know -- we probably met at least one other time**
7 **before the entity was formed and then a few times after.**
8 Q Will you tell me then your best recollection
9 of what happened at each stage of the process because
10 there was the initial contact from either Neldon or
11 Glenda asking if you were interested, and then you had
12 the meeting at Nelson Snuffer, and then you think
13 perhaps one additional meeting, and then Anstram was
14 formed; is that fair?
15 A **Yes.**
16 Q So we've already talked about the initial call
17 from either Neldon or Glenda. We've talked about
18 meeting at Nelson Snuffer. How much of the discussion
19 about what was going to be -- about forming Anstram and
20 what was going to be transferred to Anstram happened at
21 the first meeting or the second meeting?
22 A **I think it was discussed at both meetings.**
23 Q Do you recall where the second meeting was
24 held?
25 A **I think we always met at the law firm.**

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1 Q For the second meeting, do you recall if
2 anyone else was there other than you, Neldon, and
3 Glenda?
4 A **No.**
5 Q And I should back up. Do you recall Neldon
6 being at the second meeting?
7 A **Yes.**
8 Q So your second meeting you think it was with
9 you, Neldon, and Glenda?
10 A **Correct.**
11 Q Was the second meeting to flesh out details,
12 to change direction, or just -- what happened at the
13 second meeting as opposed to the first meeting?
14 A **I really don't remember, but you're probably**
15 **correct that it was to flesh more details out.**
16 Q Do you recall whether you exchanged any emails
17 with Glenda between the first and the second meeting?
18 A **No, I don't recall. We did exchange emails,**
19 **but I don't recall if it was specifically between those**
20 **meetings.**
21 Q Will you check to see if you have emails with
22 Glenda about that?
23 A **Uh-huh.**
24 Q So Paragraph 4 talks about forming Anstram
25 Energy.

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1 A **Yes.**
2 Q When did you form the -- make the decision to
3 form Anstram Energy?
4 A **Probably in that second meeting.**
5 Q And your recollection is that Neldon suggested
6 forming it as a Nevis company?
7 A **Yes.**
8 Q And that Neldon suggested the name "Anstram"?
9 A **I don't know if it was Neldon or Glenda who**
10 **suggested it but one of them did.**
11 Q In Paragraph 4 the second sentence says: We
12 also discussed liens against the real estate.
13 Does the "we" mean you, Glenda and Neldon?
14 A **Yes.**
15 Q So when was the discussion about liens against
16 the real estate?
17 A **This would have been after the entity was**
18 **formed, and we met to transfer contracts and**
19 **intellectual property to Anstram.**
20 Q So a discussion about lien was after Anstram
21 was formed?
22 A **Yes.**
23 Q Did you suggest to Glenda that she create
24 liens on the real estate?
25 A **No.**

61	<p>1 Q Were you aware during the time of these two</p> <p>2 meetings that the real estate was included in the asset</p> <p>3 freeze?</p> <p>4 A Yes.</p> <p>5 Q So did you have any discussion with Neldon or</p> <p>6 Glenda about whether or not the real estate was subject</p> <p>7 to the asset freeze?</p> <p>8 A Yes.</p> <p>9 Q What did they say?</p> <p>10 A That it was subject to the asset freeze,</p> <p>11 something along those lines. That it was part of the</p> <p>12 receivership.</p> <p>13 Q Was there a discussion between you and them</p> <p>14 about what affect that would have on Anstram's ability</p> <p>15 to get a lien on the real estate?</p> <p>16 A No.</p> <p>17 Q Did you think the liens would be valid?</p> <p>18 A Yes.</p> <p>19 Q In that same second sentence in Paragraph 4,</p> <p>20 it says: Discuss liens against the real estate to</p> <p>21 secure amounts we felt were owed to Glenda Johnson.</p> <p>22 What are the amounts that you felt were owed</p> <p>23 to Glenda Johnson?</p> <p>24 A The amounts that were owed under the contracts</p> <p>25 she had to build the towers.</p>	63
62	<p>1 Q And so -- but I read this is saying you had</p> <p>2 your own feelings about what was owed to Glenda Johnson.</p> <p>3 What was the basis for your feelings about what was owed</p> <p>4 to Glenda Johnson?</p> <p>5 A Those contracts that were to Glenda for</p> <p>6 construction of the towers.</p> <p>7 Q What's the basis for your belief about the</p> <p>8 value of those contracts?</p> <p>9 A The contracts themselves.</p> <p>10 Q And what documents were created to memorialize</p> <p>11 the agreement you had with Glenda Johnson? You already</p> <p>12 talked about the employment agreement.</p> <p>13 Are there any other agreements?</p> <p>14 A Yes. There was an assignment of her rights to</p> <p>15 Anstram Energy.</p> <p>16 Q You've described the objective was for Anstram</p> <p>17 Energy to develop this technology and then it would --</p> <p>18 once it was developed would pay Glenda Johnson</p> <p>19 50 million, right?</p> <p>20 A Correct.</p> <p>21 Q Is that agreement between you and Glenda</p> <p>22 Johnson written?</p> <p>23 A I think it's part of the assignment. We had</p> <p>24 one agreement.</p> <p>25 Q You'd expect that be part of the assignment</p>	64
	<p>1 from Glenda Johnson to Anstram Energy?</p> <p>2 A Correct.</p> <p>3 Q You think that document is written?</p> <p>4 A Yes.</p> <p>5 Q Do you have a copy of that?</p> <p>6 A I don't.</p> <p>7 Q Do you remember when you signed it?</p> <p>8 A I guess it's December. It would have been</p> <p>9 soon after the entity was formed.</p> <p>10 Q So does that agreement, for example, talk</p> <p>11 about what the obligations are of all the parties?</p> <p>12 A Yes.</p> <p>13 Q Does it talk about benchmarks for what</p> <p>14 development is going to be done and by whom and when?</p> <p>15 A No. It's not that detailed.</p> <p>16 Q What do you recall it including?</p> <p>17 A I recall that it was a simple assignment from</p> <p>18 Glenda to Anstram and a simple statement that she would</p> <p>19 be paid in the future by project development.</p> <p>20 Q We're talking about a contract worth</p> <p>21 \$50 million or more and you're saying that it's just a</p> <p>22 very simple bear bones agreement that assigns her rights</p> <p>23 to Anstram?</p> <p>24 A Yes.</p> <p>25 Q How long -- how long is the document?</p>	

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1 Anstram Energy at some point in the future would convey
2 real estate technology back to Glenda?
3 **A Yes.**
4 Q Earlier I think you said that -- your
5 recollection is that under the agreement would you pay
6 50 million-dollar to Glenda as the technology was
7 developed, right?
8 **A Correct.**
9 Q So was the idea that as Anstram developed the
10 technology, it would give \$50 million to Glenda but
11 Anstram would continue to own the technology?
12 **A The agreement was that Glenda would receive**
13 **\$50 million, but it would be in the form of completed**
14 **projects that were of that value. And Anstram would**
15 **continue after that to develop technology, yes, or**
16 **projects.**
17 Q If Anstram was formed so that Glenda could
18 transfer technology to Anstram and then Anstram would
19 develop the continuing with Glenda's help and then give
20 it back to Glenda when technology was developed, why
21 create Anstram at all? Why was it being transferred to
22 you instead of Glenda just continuing to do it on her
23 own?
24 **A I don't know the answer to that.**
25 Q Well, you were part of it. I'm trying to

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1 understand your expectation about why Anstram was a
2 necessary component of this development plan.
3 **A If think you're asking me to decide why Glenda**
4 **wanted to transfer it, I don't know. But I wanted to be**
5 **part of the development, so I was happy to create the**
6 **entity and try to move forward.**
7 Q Would Anstram retain benefits after it
8 transferred technology back to Glenda?
9 **A Yes.**
10 Q What was your expectation about what Anstram
11 would own after paying Glenda back?
12 **A We would continue to own everything that it**
13 **had been transferred to that entity.**
14 Q So you expected that Anstram Energy was going
15 to get projects and technology valued in the tens of
16 millions that you would still own after you transferred
17 projects back to Glenda?
18 **A Yes.**
19 Q And so what were you paying in order to get
20 this technology worth tens of millions?
21 **A Just the expectation of the future to assign**
22 **projects of that value back to Glenda.**
23 Q And out of pocket, you were paying nothing to
24 get this expectation of tens of millions of dollars in
25 technology?

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1 **A That's correct.**
2 Q I'm handing you what's been marked as Receiver
3 Exhibit 2160 and ask if you've seen that before.
4 **A Yes.**
5 Q This is a notice of lien recorded with Millard
6 County on December 19, 2019 and it is 26 pages.
7 **A I don't think I've seen this entire document**
8 **before.**
9 Q Okay. Tell me what you recall having seen.
10 **A I recall having seen the first pages, first**
11 **three pages.**
12 Q Is that your signature on page 2?
13 **A Yes.**
14 Q So page 1 says "Notice of lien," and then
15 Paragraph 1 says that the claimant, who is Anstram
16 Energy, correct?
17 **A Yes.**
18 Q Received an assignment from Glenda Johnson of
19 all of her contract rights, including obligations
20 involving these properties.
21 Did I read that correctly?
22 **A Yes.**
23 Q Now, it talks about an assignment. Is this
24 document itself the assignment or is this just
25 referencing the assignment we were just talking about?

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1 **A This is referencing the assignment we just**
2 **discussed.**
3 Q So you think there's a separate written
4 document that is an assignment from Glenda to Anstram?
5 **A Yes.**
6 Q But you don't have a copy?
7 **A I don't have a copy.**
8 Q What prompted you to sign this notice of lien?
9 **A I think it was explained to me that the rights**
10 **that were transferred to Anstram included contracts that**
11 **were for the construction of the towers. And that the**
12 **entity had not been paid for all the work that had been**
13 **done in the construction of those towers. And so filing**
14 **a lien would be necessary to secure those amounts that**
15 **were still owing.**
16 Q On the first page of the notice of lien the
17 bottom of the typewritten says: The properties are
18 described in Exhibits A through K. Do you see that?
19 **A Yes.**
20 Q And then among the exhibits, they are labeled
21 as Exhibits A, B, C, et cetera. Do you see that?
22 **A Yes.**
23 Q When you signed this document, did you know or
24 expect that there were going to be exhibits identifying
25 properties?

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1 A I did.
2 Q I will represent to you that when we go
3 through Exhibits A through K, which are actually 11
4 different exhibits, that there are a total of 15
5 different property parcels. For example, Exhibit K
6 lists three different property parcels, which is on
7 page 25 of 26. Do you see that?
8 A Exhibit K.
9 Q The last two pages in the document.
10 A I see that.
11 Q So I'll represent to you that there are 15
12 different parcels reflected in these exhibits.
13 Are you saying that these liens there are to
14 compensate Glenda for construction work that had been
15 done on towers?
16 A Yes.
17 Q Is it your understanding that towers were
18 constructed on all 15 properties?
19 A I don't -- I don't know that.
20 Q How many properties are you aware that have
21 towers on?
22 A I don't know how many parcels make up the
23 property that have the towers on it.
24 Q Do you think that there would be any --
25 Anstram would have any rights to assert liens against

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1 properties that did not have towers on them?
2 A I don't think so.
3 Q Do you know if any of these properties do not
4 include towers?
5 A I don't know.
6 Q But you signed this asserting a lien and that
7 Anstram was owed money for asserting a lien on 15
8 properties, right?
9 A I did sign this, yes.
10 Q And at the time you signed it, were you
11 asserting that Anstram Energy had a lien on all 15
12 properties?
13 A I didn't have all the exhibits. And my
14 understanding was that Glenda would attach the exhibits
15 where the towers had been erected or constructed.
16 Q Are you saying now that your -- you would be
17 surprised if some of these properties on which liens
18 were filed did not have towers?
19 A I would be surprised if there was no work done
20 by Glenda's entities at those sites, yes.
21 Q Would you agree that liens on properties that
22 did not have towers were not properly lienied?
23 A I agree -- if no work was done at those sites,
24 yes, it shouldn't have been lienied.
25 Q Do you know of any work that was done at sites

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1 that do not have towers?
2 A I don't know because some of the towers were
3 assembled but not fully built. And I don't know how the
4 parcels -- I don't know the -- I don't know the length
5 of the parcels, how they're made up. But I agree they
6 should only have been lienied if work had been done on
7 those sites.
8 Q Do you have any -- you or Anstram Energy have
9 any records that show what work is done at each of the
10 sites identified in this notice of lien?
11 A When I met with Glenda and Neldon they had all
12 of the contracts showing the amounts that were owed for
13 construction. And I agreed that liens should be placed
14 on properties where construction had been done and
15 owing. And Glenda prepared the notice of lien, and I'm
16 not familiar with the properties, so she was to file
17 them on the properties where work had been done.
18 Q On page 2 this indicates that you signed it on
19 December 18th at 2019. Does that sound right?
20 A Yes.
21 Q And at the time you signed this, are you
22 saying you think it was only these first two pages and
23 maybe the first page following Exhibit A?
24 A I don't believe it had all of the legal
25 descriptions on it.

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1 Q Do you remember seeing more than the first two
2 pages?
3 A No.
4 Q Do you recall where you signed -- where you
5 were when you signed this document?
6 A Yes. It was at the -- the law firm offices.
7 Q At Nelson Snuffer?
8 A Yes.
9 Q And was Glenda Johnson there?
10 A Yes.
11 Q Was Neldon there?
12 A Yes.
13 Q Was this -- and this is on December 18th,
14 correct?
15 A Yes.
16 Q And who made arrangements to use Nelson
17 Snuffer offices?
18 A Glenda and Neldon.
19 Q Was a notary an employee of Nelson Snuffer?
20 A I think so.
21 Q Did you meet with Steven Paul or Denver
22 Snuffer at that time?
23 A I don't remember them being there.
24 Q What else happened during that meeting when
25 you signed this document?

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1 A I think that was the same meeting where we
2 would have assigned -- assigned the assignment agreement
3 that we had discussed earlier. And at that meeting
4 Glenda had copies of the contracts that she had and also
5 copies of the assignments of intellectual property to
6 her, things the contracts, items that were to be
7 assigned to Anstram.
8 Q And you reviewed them at that time, right?
9 A Yes.
10 Q But you do not have copies, correct?
11 A I do not have copies.
12 Q Did you ever have copies?
13 A No.
14 Q Any other liens signed at that time?
15 A I don't remember. I think I signed more than
16 one. But I don't remember if it was at the same date.
17 Q To what extent was this lien an attempt to
18 interfere with the receiver's efforts to take control of
19 their properties?
20 A It certainly wasn't my intent. I thought this
21 would be amounts owing that was outside of the
22 receivership.
23 Q Did you undertake any efforts to determine
24 whether or not filing these liens would interfere with
25 the receiver's control of the properties?

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1 A No.
2 Q Did you do any research to try and find out
3 whether these -- filing these liens would violate the
4 receivership order?
5 A I did not.
6 Q Why not?
7 A I thought that the contracts that Glenda had
8 that was being assigned to Anstram preceded the
9 receivership. I thought they would be not part of the
10 receivership. I didn't think Glenda was a part of
11 receivership. I thought these contracts predated
12 everything. I thought that they would be still owing.
13 Q But you knew that receivership order had been
14 entered?
15 A Yes.
16 Q And did you know that properties owned by
17 Glenda Johnson were specifically listed in the
18 receivership order as subject to the asset freeze?
19 A I didn't know that Glenda was part of the
20 asset freeze.
21 Q Did you know that real estate owned by Glenda
22 Johnson was specifically identified in the receivership
23 order and identifies as being subject to the asset
24 freeze?
25 A I didn't think any of Glenda's assets were

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1 part of the asset freeze. I'm not aware of that.
2 Q Were you aware that the receivership order has
3 an expressed prohibition against anyone interfering with
4 the receiver's efforts to take control of the
5 properties?
6 A No.
7 Q Did anybody make statements to you to the
8 effect that these liens would not violate the
9 receivership order?
10 A No. I don't think we discussed it. Honestly
11 I thought this was done -- these contracts were prior to
12 the receivership. I thought they were valid.
13 Q Your signature on page 2 here indicate that
14 you are verifying the accuracy of information and notice
15 of lien? Let me rephrase the question.
16 A Uh-huh.
17 Q What do you understand your signature meant by
18 affixing it on page 2 of this document?
19 A My understanding was that there were amounts
20 owed to Glenda that were being assigned to Anstram based
21 on the construction of the towers, and that Glenda would
22 file mechanics liens on those properties where the work
23 had been completed, and she would attach the legal
24 descriptions for those properties and file it.
25 Q Was it your understanding by signing page 2

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1 that you were affirming that the properties described in
2 Exhibits A through K were property subjects of the
3 subject of liens owned by Anstram Energy?
4 A That was what I understood would happen, that
5 these would be filed on the correct properties.
6 Q Have you seen a copy of this document
7 previously that is complete with the recording data on
8 it and all the exhibits attached?
9 A I don't think so.
10 Q So is it your recollection that you just
11 signed the first two pages, right?
12 A Yes.
13 Q And is it your expectation that Glenda would
14 have affixed the exhibits and then recorded it?
15 A Yes.
16 Q Have you visited the 15 properties described
17 in Exhibits A through K?
18 A I don't know.
19 Q How many properties have you visited in
20 Millard County belonging to or relating to Neldon
21 Johnson and Glenda Johnson?
22 A I visited the -- I guess the site where they
23 have the fabrication machines and then the various sites
24 that we discussed, the research and development site.
25 And then there's the site that has a -- I

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1 think it has a single family home on it, and then behind
2 that there's a large amount of land that has towers
3 partially constructed.
4 Q Let's quickly do two more exhibits and then
5 we'll break for lunch. I'm handing you what's been
6 marked as Receiver Exhibit 2170. This is notice of
7 lien. And it has a recording stamp with the Utah County
8 Recorder dated December 19, 2019. It is three pages
9 long. Have you seen this before?
10 A Yes.
11 Q Is that your signature on page 2?
12 A It is.
13 Q Do you know what property in Utah County is
14 the subject of this lien?
15 A My understanding it was a property where a few
16 towers had been built.
17 Q If you look at the third page, it says, This
18 is Lot 6, Plat A, West Mountain Estates Amended
19 Subdivision. And I'll represent to you that this is a
20 5-acre parcel in West Payson where Neldon and Glenda
21 Johnson live.
22 Have you ever been to their home in Payson?
23 A I have been to their home.
24 Q I'll represent that that is the property that
25 is the subject of this lien. To your knowledge, were

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1 there any solar towers erected there?
2 A Not at their home. I haven't seen any there.
3 Q How much do you think their home is worth?
4 A I have no idea.
5 Q Do you think it was worth that
6 2 million-dollar?
7 A I don't think it's worth \$2 million, no.
8 Q When you signed this document, do you believe
9 that all three pages were part of the document?
10 A I don't think that the third page was part of
11 it.
12 Q Okay. The first page identifies Exhibit A and
13 lists the serial number and it says 5.25 acres. Do you
14 see that?
15 A Yes.
16 Q Was that there when you signed this document?
17 A Yes.
18 Q And what did you understand the purpose of
19 this lien was for?
20 A My understanding was that this was another
21 property that had some tower development on it that
22 would be part of the assets that were assigned to
23 Anstram and were monies still owing.
24 Q And if there were no tower development on this
25 property in Payson, do you agree that the lien was

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1 improper?
2 A Yes.
3 Q I'm handing you what's been marked as Receiver
4 2171, which is a notice of lien filed with the county
5 clerk for Howard County, Texas, on January 14 of 2020.
6 This is a five-page document.
7 Have you seen this before?
8 A I have seen the first two pages before.
9 Q Is that your signature on page 2?
10 A Yes.
11 Q Is it your recollection that only the -- you
12 only saw the first two pages when you signed it?
13 A Yes, that's correct.
14 Q And this is for property in Texas. On the
15 first page it identifies the Exhibit A is being
16 608 acres and Exhibit B being 18 acres.
17 Do you see that?
18 A Yes.
19 Q Do you recognize what property is referenced
20 here?
21 A I don't know the specific property. But my
22 understanding was that some towers work had been done in
23 Texas. And so if mechanics liens would be filed on work
24 that was owed at these properties.
25 Q What made you believe that work had been done

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1 on towers in Texas?
2 A I just trusted that Glenda told me that it had
3 been done and she had the contracts.
4 Q Did she tell you that work had been done on
5 towers in Texas?
6 A Yes.
7 Q Did she tell you that the work had been done
8 on towers in Payson?
9 A She told me that work had been done on all the
10 properties that liens were being filed on.
11 Q Have you ever been to the property in Texas?
12 A No.
13 Q So if there were no work on towers in Texas,
14 would you agree this lien was improperly filed?
15 A Yes.
16 Q Do you know who the owner is of the property
17 in Texas?
18 A I don't. I would have assumed it was
19 International Automated Systems.
20 Q I'll represent to that the property in Texas
21 is titled in the name of MP Johnson Family Limited
22 Partnership. Have you ever heard of that entity?
23 A No.
24 Q To your knowledge, did Glenda Johnson own any
25 interest in the MP Johnson Family Limited Partnership?

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1 A I don't even know what that is.
2 Q Do you know what rights she had to assert a --
3 to claim that she had done work and had the ability to
4 grant a lien on property that she didn't own?
5 A I thought that her company or herself had done
6 work erecting towers at the sites where the liens were
7 to be filed. That was our discussion.
8 Q Looking at the fourth paragraph. Do you see
9 the amount of the mechanic's lien?
10 A Yes.
11 Q What's that amount?
12 A \$10 million.
13 Q Is it your understanding that Glenda Johnson
14 or her company had done \$10 million worth of work on
15 this property in Texas?
16 A Yes.
17 Q Where did you get that information?
18 A That was represented to me by Glenda and also
19 it appeared possible under the contracts that were being
20 assigned to Anstram.
21 Q So you think it may have been referenced in
22 some of the documents that you saw but didn't take a
23 copy of?
24 A Correct.
25 MR. KLEIN: Let's take a break for lunch.

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1 (Recess from 12:28 to 1:18.)
2 MR. WALL: I'll note for the record Mr. Walls
3 is not present.
4 BY MR. KLEIN:
5 Q Mr. Olsen, during lunch did you speak with
6 anyone else about this matter?
7 A Nope.
8 Q Before lunch we were talking about the notice
9 of lien against the Texas property. Do you remember
10 that?
11 A Yes.
12 Q Can you pull that exhibit back, which is 2171.
13 On page 2, this says it was signed on
14 January 9th of 2020. Do you see that?
15 A Yes.
16 Q Which is different than the December 18th
17 signature on the other two liens, correct?
18 A Correct.
19 Q Do you remember what the circumstances were
20 when this was signed?
21 A Likely the same circumstances.
22 Q Do you think you met at Nelson Snuffer and
23 signed it there?
24 A Yeah, I think so.
25 Q Because the same notary notarized your

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1 signature for this one. Does that help you remember if
2 it was at Nelson Snuffer?
3 A It most likely was, yes.
4 Q Do you remember anything about that January
5 meeting and why it was necessary?
6 A I don't remember if Neldon or Glenda reached
7 out to me and asked if we could meet at the law firm's
8 offices, and I agreed to meet with them.
9 Q Did you have an independent recollection of
10 that meeting?
11 A Not particularly independent from the other
12 meetings.
13 Q Do you still own Anstram Energy?
14 A No.
15 Q Who does?
16 A I believe Roger Hamblin.
17 Q And when you sold Anstram Energy to Roger
18 Hamblin, what did you tell him about the underlying
19 agreement with Glenda Johnson?
20 A I didn't tell him anything.
21 Q Did you tell him that there was an agreement
22 between Glenda Johnson and Anstram about what Anstram's
23 obligations were to Glenda?
24 A No.
25 Q Did you tell him about Glenda's employment

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1 agreement?
2 A No.
3 Q Did you tell him about any of the liens?
4 A I did not.
5 Q Do you remember anything that you told him?
6 A I didn't even meet with him.
7 Q Then how is it you could sell him a company
8 and never meet with him?
9 A I think in February Glenda contacted me. And
10 I don't remember if she discussed on the phone, but
11 Neldon and Glenda came to my house and asked me if I
12 would transfer the company, which was a bit of a shock
13 to me. And then ultimately I agreed that I would. So I
14 drafted a simple transfer document and signed it.
15 Q This morning we talked about how you expected
16 that Anstram was going to benefit in the tens of
17 millions of dollars from its agreement with Glenda,
18 correct?
19 A Correct.
20 Q Why would you be willing to give up that
21 potential income and transfer the company to Roger
22 Hamblin?
23 A Well, I concluded that it would be nearly
24 impossible to go forward without cooperation from Glenda
25 and tangentially from Neldon. So I figured I wouldn't

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1 be able to realize that without their cooperation.
2 Q Was there an explicit or implicit threat that
3 if you didn't transfer it to them it would be worthless
4 because they wouldn't help you?
5 A I don't think there was a threat, but that's
6 how I understood the situation.
7 Q That if they asked you to transfer it and you
8 refused, then the company would not have any value?
9 A It would be very difficult, if not impossible,
10 I believe, to develop -- to finish the technology
11 without their assistance.
12 Q Did that make you feel powerless?
13 A I think I -- yeah, probably.
14 Q Was this after your tax court trial?
15 A I think it was but I don't remember exactly
16 when that ended. I think it was.
17 Q Did you feel like your tax court trial had
18 gone well?
19 A I did, as well as I could have ever hoped.
20 Q Was there something about your tax court trial
21 that made you think that the rights that Anstram had
22 acquired were worthless?
23 A No.
24 Q Is there something about your tax court trial
25 that made you want to relinquish ownership of Anstram?

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1 A No.
2 Q And how much did Roger Hamblin pay you for
3 Anstram?
4 A I don't think he paid me anything.
5 Q Well, do you -- do you agree that it makes no
6 economic sense for you to sell Anstram to Hamblin for no
7 consideration when you had -- were expecting tens of
8 millions of dollars worth of income?
9 A I don't agree, no.
10 Q Tell me how you view it.
11 A I just told you a few minutes ago. Without
12 cooperation with from Glenda and Neldon, I don't think
13 the company was worth anything.
14 Q When was your first discussion with Roger
15 Hamblin about Anstram Energy?
16 A First time I -- I'm trying to think when we
17 met to sign those declarations at the law firm. I don't
18 think -- that was one of the first times I had seen
19 Roger since February, but I don't believe we discussed
20 the company at that time. But if we did that would have
21 been the first time.
22 Q I'm handing you what's been marked as
23 Exhibit 2206.
24 A Okay.
25 Q Which is labeled Second Declaration of Glenda

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1 Johnson, dated June 10 -- filed June 10, 2020, Document
2 Number 937. If you would look at that and let me know
3 whether you think you've seen that before.
4 A I don't think so. I've not seen it.
5 Q This is a declaration that she signed on
6 June 9th of 2020. And on the second page, if you look
7 at Paragraph 3A and 3B, 3A says: In approximately
8 October or November 2019 I decided to sell all, paren,
9 or any close, paren, right, title or interest that I had
10 in any property, real property, contracts, or assets
11 associated with Johnson Fresnel solar lenses.
12 B3 says: I contacted Preston Olsen and let
13 him know of my intentions. He said he would be
14 interested.
15 Is that consistent with your recollection?
16 A Yes.
17 Q And then Paragraph 3C she says that he,
18 meaning you, decided that a Nevis company would be the
19 safest place to hold any right, title, or interest he
20 would purchase for me.
21 Is that consistent with your recollection?
22 A I think ultimately I decided after they had
23 brought it up. I never heard of forming a company in
24 Nevis before. But did a little research and it seemed
25 like a good decision.

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1 Q But the idea was first raised I think you said
2 by Neldon Johnson, correct?
3 A I think so, yes.
4 Q On the next page in paragraph 3J, Glenda
5 Johnson says: I told Roger Hamblin about Preston Olsen,
6 and Anstram Energy suggested he contact Preston Olsen.
7 Do you see that?
8 A Yes.
9 Q Did Roger Hamblin ever contact you about
10 buying Anstram Energy?
11 A No.
12 Q How did the contact occur for you to start the
13 process to you to sell Anstram Energy to Roger Hamblin?
14 A I just mentioned, I think Glenda contacted me
15 and asked if she could come by my home, which she had
16 never done previously. And when she and Neldon came to
17 my house, they asked me if I would transfer the company
18 to Roger Hamblin and I agreed.
19 Q To your recollection, did you have any
20 discussion with Roger Hamblin before the date that
21 Glenda and Neldon Johnson came to your home?
22 A No.
23 Q That was a badly worded question.
24 You don't recall any or there were none?
25 A There were none. I had not talked with Roger

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1 Hamblin about this.
2 Q I'm handing you what's been marked as Receiver
3 Exhibit 2177, which is dated February 29th. And it has
4 Docket Number 937-2 filed June 10th of 2020.
5 Do you recognize this document?
6 A I do.
7 Q Did you create this?
8 A Yes.
9 Q Is this something you created because Neldon
10 and Glenda Johnson told you that they wanted you to sell
11 Anstram to Roger Hamblin?
12 A Yes.
13 Q Did you create this in advance or when they
14 came to your house?
15 A When they came to my house.
16 Q Did you have any discussions with Roger
17 Hamblin before this date about the terms of the sale to
18 him?
19 A No.
20 Q In the end of the first paragraph there is a
21 blank line with handwritten "Roger Hamblin" there as
22 transferee. Do you see that?
23 A Yes.
24 Q At the time you created this, did you know
25 that Roger Hamblin was going to be the transferee?

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1 A I did.
2 Q Why did you not type his name in there?
3 A I'm not sure why I didn't type his name in
4 there. I just left it blank. They told me that they
5 would go get Roger to sign it.
6 Q When you signed it, was Roger Hamblin's name
7 on there?
8 A No.
9 Q Did Glenda sign it when she was at your house
10 or subsequently?
11 A At my house, I believe, yes. I think she
12 signed it at my house.
13 Q Did Glenda give you any money at the time you
14 signed this document?
15 A No.
16 Q Have you gotten any money since then?
17 A No.
18 Q And Hamblin has not given you any money,
19 correct?
20 A Correct.
21 Q So in the fifth paragraph: It says for \$10
22 and any other good and valuable consideration, the
23 transferor and transferee agree as follows.
24 You did not even receive a \$10, correct?
25 A Actually, I think he may have given me the \$10

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1 when we met at the law firm.
2 Q "He" being Roger Hamblin?
3 A Yes. But I hadn't really thought about that
4 but I think he did.
5 Q At the time you drafted this, what was the
6 other good and valuable consideration you had in mind?
7 A I didn't have anything in mind.
8 Q So is it a fair summary to say that after your
9 effort in researching, creating a Nevis company, and
10 forming it and then owning it for three months, you
11 transferred it to Roger Hamblin and got \$10 out of it?
12 A That's correct.
13 Q Were you happy about that?
14 A No.
15 Q Did you express that unhappiness to Neldon or
16 Glenda Johnson?
17 A I'm not sure how I expressed it. I was
18 surprised but I don't remember. I don't remember being
19 angry with them.
20 Q Did you ever get a copy of the agreement that
21 had everybody's signatures?
22 A I believe I did.
23 Q Do you recall when and how you got a copy with
24 everybody's signatures?
25 A I don't recall. I think I asked Glenda for a

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1 copy -- I know I received one from her at some point. I
2 don't remember if it was in person or email.
3 Q I think you said this morning that you did not
4 give Roger Hamblin any documents relating to Anstram,
5 correct?
6 A That's correct.
7 Q You had no discussions with him about the
8 assets and liabilities of Anstram, correct?
9 A That's correct, yes.
10 Q Or of Glenda Johnson's role?
11 A Correct.
12 Q So is it fair to say that any information
13 Roger Hamblin has about Anstram would have had to come
14 from Glenda Johnson and not you?
15 A Yes.
16 Q This is Exhibit 2180, which is declaration of
17 Glenda Johnson filed May 14, 2020, Docket Number 925.
18 Review that and let me know if you think
19 you've ever seen it.
20 A I've never seen it.
21 Q If you turn to Paragraph 2E and F on page 2,
22 Glenda Johnson indicates that on May 5th she reached out
23 to Preston Olsen one or two times. He signed the liens
24 on behalf of Anstram Energy, LLC at issue in the
25 receiver's affidavit of noncompliance, which were

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1 directed to be released by the Court in Order Dock 920.
2 Paragraph F says: I was unable to speak with
3 Preston Olsen.
4 Do you see that?
5 **A Yes.**
6 Q Do you have any recollection of whether Glenda
7 Johnson tried to contact you on May 5th?
8 **A I have no recollection of her contacting me.**
9 Q Do you recall her ever asking you to sign a
10 release of liens?
11 **A No. I would have done it if she asked me to.**
12 Q Well, on May 5th of 2020 could you have
13 released the liens?
14 **A No, I couldn't have.**
15 Q On May 5th did Glenda know that you had
16 transferred Anstram Energy to Roger Hamblin?
17 **A Yes.**
18 Q Do you have any idea why in this declaration
19 she says that she tried to contact you about releasing
20 the liens?
21 **A I don't, no.**
22 Q Paragraph 2G she says: I was -- start over.
23 I knew that Preston Olsen was planning to sell
24 his interest in Anstram Energy, LLC to Roger Hamblin.
25 Do you see that?

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1 **A Yes.**
2 Q Is it accurate for Glenda Johnson to say in
3 May of 2020 that she knew that you were planning to sell
4 your interest in Anstram Energy?
5 **A Probably not. It was already done.**
6 Q Have you had any discussions with Glenda at
7 all about her wanting your help to get liens released?
8 **A No.**
9 Q Have you had any discussion with her at all
10 about why she would represent to the Court that she
11 tried to get a release of liens from you and was unable
12 to contact you?
13 **A No.**
14 Q If she had tried to reach out to you on
15 May 5th via email or phone or text, would you have a
16 record of it?
17 **A I don't know if my texts and voice-mails are
18 saved back that far. But if they were, they would be.**
19 Q Can I ask you to check to see?
20 **A Sure.**
21 Q You can do it another time.
22 **A Okay.**
23 Q Let's add it to the list.
24 **A It would only take a few minutes. Check texts
25 and email.**

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1 Q And phone.
2 **A For Glenda specifically?**
3 Q Or Neldon.
4 **A Okay. Specifically on releasing liens.**
5 Q Correct.
6 **A Yeah, I have no recollection of that.**
7 Q This declaration from Glenda Johnson is dated
8 May 14th. Were you aware that she was submitting
9 declarations to the Court and a receiver had filed a
10 notice of noncompliance?
11 **A No. I was aware that declarations were being
12 submitted because I submitted one, but I didn't look at
13 hers or anything.**
14 Q Did you know what had triggered their request
15 for your declaration?
16 **A I'm not exactly sure what triggered it, but I
17 assumed it had to do with the liens that Anstram Energy
18 put on the properties.**
19 Q I'm handing you what's been marked as receiver
20 Exhibit 2179, which is a court order dated May 5th of
21 2020, Document Number 920.
22 Do you believe you've seen this before?
23 **A I don't think so.**
24 Q If you'll look -- okay. That's all on that
25 document.

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1 I'm sorry, let's go back to that document.
2 **A Okay.**
3 Q Look in Paragraph 21 if you would on page 5.
4 It states: Glenda Johnson violated the corrected
5 receivership order by filing the tower property lien,
6 Millard County lien, Payson lien, Texas lien, and the
7 Wings West lawsuit. Do you see that?
8 **A Yes.**
9 Q Were you aware that the Court had found that
10 she had violated the receivership order by filing liens?
11 **A No.**
12 Q On the next page under the order section,
13 Paragraph 2 says: Glenda Johnson shall release the
14 Payson lien, the Texas lien, and Millard County lien
15 within three days of the entry of this order.
16 Do you see that?
17 **A Yes.**
18 Q Were you aware that she had been ordered to
19 release those liens?
20 **A I was not.**
21 Q And that was on May 5th of 2020. So then we
22 talked about her declaration, which was dated May 14th
23 or nine days after that.
24 I'm handing you what is receiver Exhibit 2181,
25 which is Court Order Document Number 933 dated June 4th

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1 of 2020.
2 Have you seen this document before?
3 A I don't think so. I only hesitate because I
4 know that -- I'm sorry, your counsel -- you forwarded me
5 a document, but I don't remember which one it was. I
6 don't even know if I opened it.
7 Q If you turn to page 4, it states that in the
8 second full paragraph: In order to Glenda Johnson to
9 establish her present and ability to comply with the
10 order by no later than June 10, 2020, she must file a
11 declaration detailing: A, her history of dealings with
12 Preston Olsen and Roger Hamblin; B, any known history of
13 Olsen and Hamblin with any of the defendants or
14 affiliated entities in this case; C, all last known
15 historic contact information for Olsen and Hamblin, as
16 well as additional information listed there.
17 Do you see that?
18 A Yes.
19 Q Were you aware that she had been ordered to
20 file a declaration and provide that information?
21 A I don't think I was aware of the details, but
22 I'm sure this is why her counsel called me to -- well,
23 I'm not sure. I'm guessing that this is why her counsel
24 called me. And I'm sure that on the phone he mentioned
25 some of this.

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1 Q But he did not send you a copy of this order?
2 A Not that I remember.
3 Q What was her deadline by the Court to provide
4 that information?
5 A Want me to read it?
6 Q Well, do you see the deadline was June 10th?
7 A Yes.
8 Q Do you recall when you signed your
9 declaration?
10 A Not without looking.
11 Q You can look.
12 A Okay.
13 This is dated June 9th.
14 Q And then filed on June 10th, correct?
15 A Yes.
16 Q I'm handing you what's been marked as Receiver
17 Exhibit 2186, which is Memorandum Decision and Order
18 dated August 6, 2020, Document 984.
19 If you turn to the last page, page 25,
20 Paragraph 1 of the order says: The liens that Glenda
21 Johnson granted to Anstram Energy on the properties in
22 Utah County, Utah, Millard County, Utah, and Howard
23 County, Texas are invalid, void and have no effect. Do
24 you see that?
25 A Yes.

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1 Q Were you aware the Court had declared those
2 liens invalid?
3 A I became aware this week when your counsel --
4 I think this is the document he forwarded to me.
5 Q Did you ever have any discussions with Neldon
6 or Glenda Johnson about the liens being declared
7 invalid?
8 A No.
9 Q Did you ever have any discussions with Roger
10 Hamblin about the liens being declared invalid?
11 A No.
12 Q If you would turn back to Exhibit 2178, which
13 is contempt order.
14 A Sorry, I'm not seeing it. I see 2179.
15 Q I think it's in this stack.
16 A Okay.
17 Q So this is in the stack that we provided for
18 you. Let me start over.
19 When you met with Neldon and Glenda Johnson on
20 February 29th of 2020, were you aware that the Court had
21 already held Glenda Johnson in contempt?
22 A No.
23 Q I'm handing you Exhibit 2178. And if you
24 would read out loud Paragraph 45.
25 A "The Court will address the merits of

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1 ownership of the Utah County and Millard County real
2 properties in response to the motion for turnover
3 already filed. But even if she believed that her claim
4 to ownership should prevail, Glenda's action to file
5 these liens violates the asset freeze, the CRO, and the
6 affiliate's order."
7 Q Do you understand that CRO references
8 corrected receivership order?
9 A I didn't know that but thank you. But she
10 intended to interfere with the receivership through
11 unilateral action rather through allowable legal
12 processes.
13 Q Were you aware the Court had made that finding
14 about Glenda?
15 A No.
16 Q Have you taken any actions relating to Anstram
17 Energy since February 29, 2020?
18 A The only thing I did was forward the email
19 to -- that I received to register the company or to keep
20 the registration current.
21 Q So on February 29th when you created the
22 agreement to transfer Anstram to Roger Hamblin, did you
23 notify anybody in Nevis about the transfer?
24 A No.
25 Q So even though you had signed over Anstram to

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1 Roger Hamblin, did the Anstram registered agent in Nevis
2 know that transferred occurred?
3 **A Only if Roger notified them.**
4 Q And how would Roger have known to notify them?
5 **A All the documents -- Glenda had all the**
6 **company documents. I assume that she provided them to**
7 **Roger.**
8 Q Would Glenda have had any authority to notify
9 the registered agent that ownership had changed?
10 **A I don't know.**
11 Q Did you have any communications with the
12 registered agent after February of 2020?
13 **A No.**
14 Q But you indicated that you received
15 information about some invoices that were due?
16 **A There was some information about the preparing**
17 **to register -- to continue the registration fees.**
18 Q And so did you -- what did you do with that
19 information?
20 **A I forwarded it to Glenda and said: You should**
21 **forward this to Roger. I didn't have his email address.**
22 Q Have you had any communications with
23 Mr. Hamblin about whether or not he paid those fees?
24 **A Yes. As I mentioned at the very beginning,**
25 **this -- I want to say this week I called him and that**

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1 was one of the things I brought up on the phone. I just
2 asked him if he had received the email.
3 Q Have you had any other business dealings with
4 Roger Hamblin other than with Anstram Energy?
5 **A No.**
6 Q Either before or after Anstram?
7 **A Never.**
8 Q What other dealings have you had with Glenda
9 Johnson other than with Anstram?
10 **A Only to the extent she was involved with the**
11 **sale of the lenses perhaps and possibly IAS before that.**
12 Q Have you had any contracts or agreements
13 between you and Glenda Johnson other than her employment
14 with Anstram?
15 **A No. And obviously the assignment-correlating**
16 **documents.**
17 Q Has Glenda Johnson ever paid you any monies?
18 **A No.**
19 Q Have you ever paid her any monies other than
20 for purchases of lenses?
21 **A The lenses is the only thing.**
22 Q Do you think those payments were to her
23 individually or were to one of the companies?
24 **A They were to the companies.**
25 Q What dealings have you had with Neldon Johnson

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1 other than purchasing lenses?
2 **A None that I can think of.**
3 Q Have you ever paid Neldon Johnson any monies
4 other than monies you paid to the company for the
5 purchase of lenses?
6 **A Nothing else.**
7 Q Has Neldon Johnson ever paid you any monies?
8 **A No.**
9 Q Has any of his companies?
10 **A No, unfortunately.**
11 Q Since August 22nd of 2018, so after the trial,
12 have you taken any actions regarding the solar lenses or
13 solar technology?
14 **A Just the tax court trial, I guess. I don't**
15 **know.**
16 Q Have you gone to -- onto any of the properties
17 listed in the receivership order?
18 **A I don't think so.**
19 Q Have you gone onto either of the properties
20 that have solar towers?
21 **A No.**
22 Q Have you -- I think mentioned you went to
23 Neldon and Glenda Johnson's house in Payson, correct?
24 **A I did, yes.**
25 Q Was that after August of 2018?

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1 **A That would have been -- that would have been**
2 **I'm guessing January of this year or December of last.**
3 Q You also mentioned that you had seen the new
4 turbine that was being built at the manufacturing place.
5 You went there and saw the turbine, correct?
6 **A Yes.**
7 Q And that was in 2019?
8 **A I think so, yes.**
9 Q Have you used -- have you been anywhere else
10 where that turbine was?
11 **A No.**
12 Q I'll represent to you that that turbine was
13 delivered to Neldon Johnson's home in Payson. Have you
14 been to his home in Payson when the turbine was there?
15 **A No, not when it was there.**
16 Q Have you used any tools or equipment or
17 testing equipment relating to the solar scheme since
18 August of 2018?
19 **A Nope.**
20 Q Do you have possession of any monies,
21 equipment, solar components, records, or vehicles that
22 once belonged to Neldon Johnson or people and companies
23 associated with him?
24 **A No.**
25 Q Do you know where any monies, equipment, solar

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1 components, records or vehicles are that Neldon Johnson
 2 or his companies had?
 3 **A No. Other than the ones I've seen at the**
 4 **places in Delta I guess.**
 5 Q Have you destroyed any of your own records
 6 since January 22nd of 2018 about these companies?
 7 **A No.**
 8 Q Mr. Olsen, those are all the questions that I
 9 have. And I want to give you an opportunity if you'd
 10 like to make any other -- statements or clarifying
 11 statements if you think there's anything that you would
 12 like to clarify from our earlier discussion.
 13 **A I can't think of anything.**
 14 Q Do you want the opportunity to read and sign
 15 the transcript?
 16 **A Yes.**
 17 MR. KLEIN: That's all I have and I appreciate
 18 you coming in and we're off the record.
 19 (Concluded at 2:00 p.m.)
 20
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1 REPORTER'S CERTIFICATE
 2 STATE OF UTAH)
 3 COUNTY OF SALT LAKE)
 4
 5 I, Heidi Hunter, RPR, CCR, for the state
 6 of Utah.
 7 That the foregoing proceedings were taken
 8 before me at the time and place set forth in the
 9 caption hereof; that the witness was placed under
 10 oath to tell the truth, the whole truth, and nothing
 11 but the truth.
 12 That I thereafter transcribed my said
 13 shorthand notes into typing and that the typewritten
 14 transcript of said deposition is a complete, true
 15 and accurate transcription of my said shorthand
 16 notes taken at said time.
 17 I further certify that I am not a relative
 18 employee, attorney, or counsel of any of the parties
 19 nor am I a relative or employee of any of the
 20 parties' attorney or counsel connected with the
 21 action, nor am I financially interested in the
 22 action.
 23
 24 *Heidi Hunter*
 25 _____
 Heidi Hunter, RPR, CCR

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1 CERTIFICATE OF DEPONENT
 2 Case: USA v Rapower-3, et al
 3 Reported by: Heidi Hunter, RPR, CRR
 4 Date Taken: September 4, 2020
 5 WITNESS CERTIFICATE
 6 I, Preston Olsen, HEREBY DECLARE:
 7 That I am the witness in the foregoing
 8 transcript; that I have read the transcript and know
 9 the contents thereof; that with these corrections, I
 10 have noted this transcript truly and accurately
 11 reflects my testimony.
 12 PAGE-LINE CHANGE-CORRECTION REASON
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____
 25 _____

I, Preston Olsen, deponent herein, do hereby certify and declare, under penalty of perjury the within and foregoing transcription to be true and correct. hereby affix my signature to said deposition.

 DATE Preston Olsen

Subscribed and sworn to before me this _____ day of _____, 2020.

 Notary Public

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