



**U.S. Department of Justice**

**Tax Division**

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Please reply to: Civil Trial Section, Central Region  
P.O. Box 7238  
Washington, D.C. 20044

DAH:RSC:EHealyGallagher  
DJ 5-77-4466  
CMN 2014101376

March 30, 2017

**VIA EMAIL AND FEDEX**

Justin D. Heideman (jheideman@heidlaw.com)  
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Donald S. Reay (donald@reaylaw.com)  
REAY LAW, PLLC  
43 West 9000 South, Suite B  
Sandy, Utah 84070

Re: United States v. RaPower-3, LLC, et al.  
Case No. 2:15-cv-00828-DN-BCW

Dear Counsel:

Enclosed are four discs containing documents produced to the United States. We intend to supplement this production as we continue to receive documents.

The Bates ranges we produce are:

BANKOFAMERICANFORK-00001 through BANKOFAMERICANFORK-02662  
CYPRUS\_000001 through CYPRUS\_000982  
Freeborn\_Roger-00001 through Freeborn\_Roger-00624  
Halverson\_Roger-00083 through Halverson\_Roger-00341  
Jameson 000001 through Jameson 023002  
JP\_Morgan\_Chase-00001 through JP\_Morgan\_Chase-02306  
KeyBank-000001 through KeyBank-000253  
KM00001 through KM00322  
LUCITE0001 through LUCITE0981. **Please note that Lucite has designated these documents as CONFIDENTIAL INFORMATION under the terms of the protective order.**  
MCCU-000001 through MCCU-001523  
MM004145 through MM004410

**Plaintiff  
Exhibit**

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- 2 -

PAC00001 through PAC02425. **Please note that PacifiCorp has designated documents at bates numbers PAC00347 through PAC02425 as CONFIDENTIAL INFORMATION under the terms of the protective order.**

PSK000001 through PSK000072

Shepard\_Greg-00001 through Shepard\_Greg-04016. We also produce native files from Mr. Shepard.

WF-000001 through WF-011634

Zions\_Bank-00001 through ZIONS\_BANK-009136.

Please also note that, consistent with Fed. R. Evid. 1006, we may use a summary chart and/or summary witness to present the information in the voluminous bank records to the court.

The discs are encrypted. I will send the password by email. Please let us know if you have any issues accessing the information.

Sincerely,

/s/ Erin Healy Gallagher

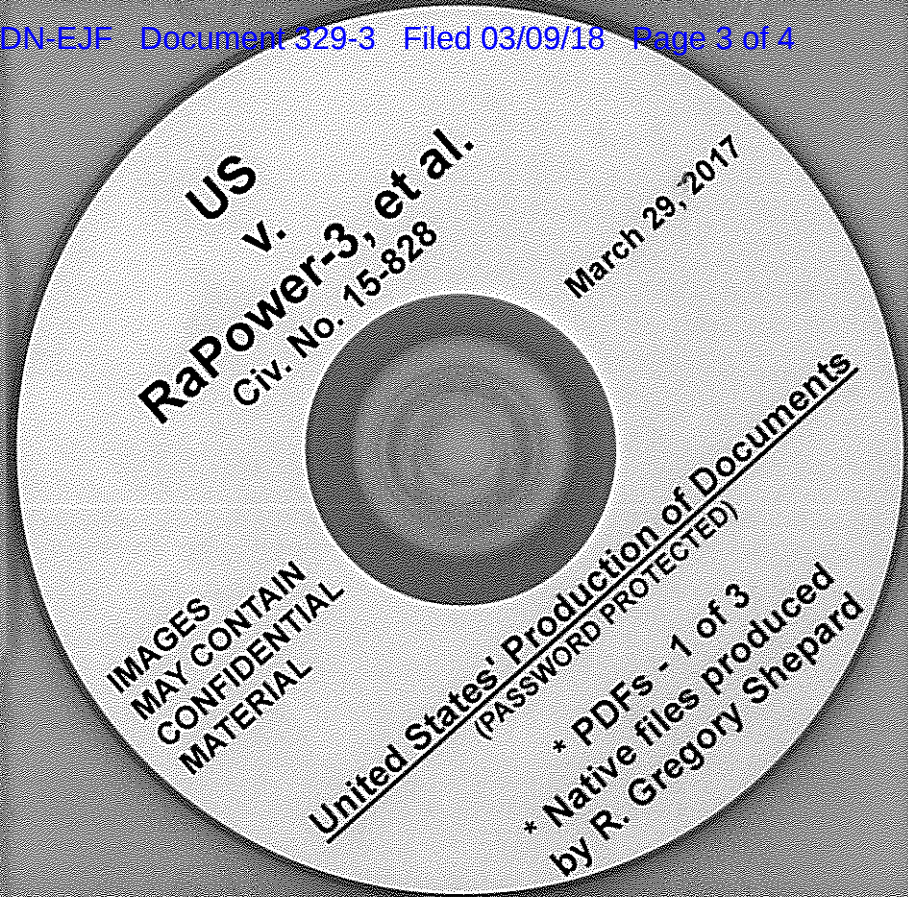
ERIN HEALY GALLAGHER

Trial Attorney

Civil Trial Section, Central Region

Encl. w/ hard copy

CC w/o encl.: Christian Austin

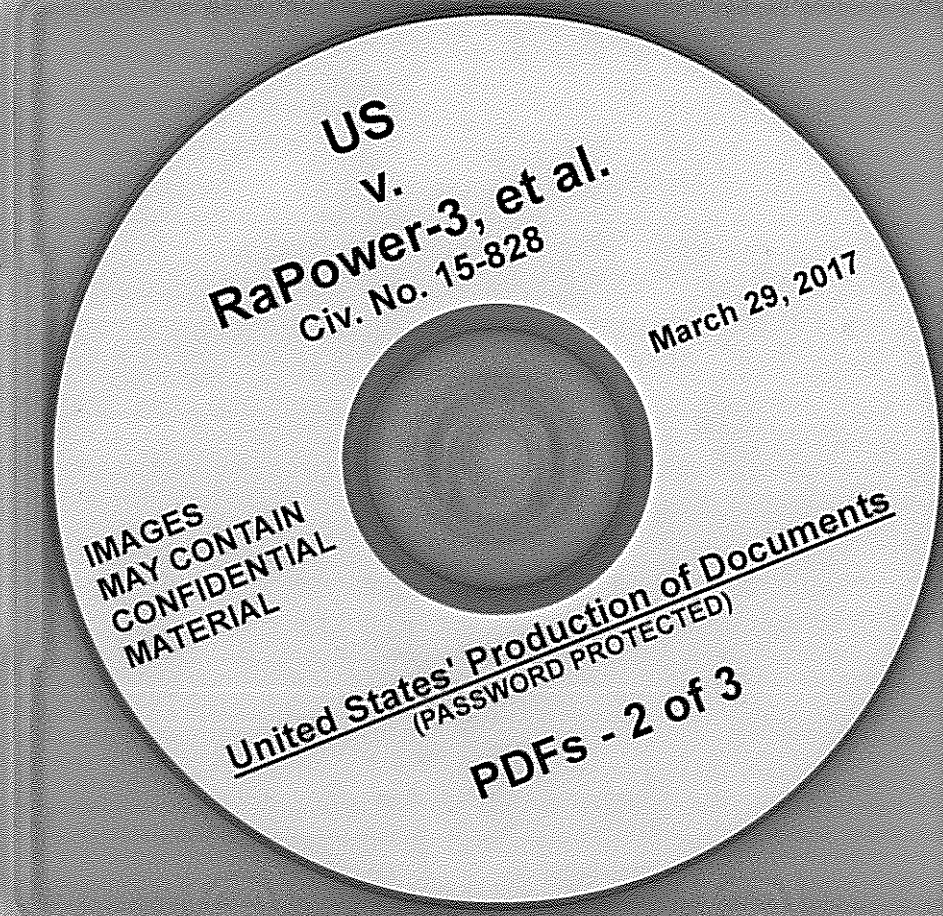


**US**  
**v.**  
**RaPower-3, et al.**  
**Civ. No. 15-828**

**March 29, 2017**

**IMAGES  
MAY CONTAIN  
CONFIDENTIAL  
MATERIAL**

**United States' Production of Documents**  
**(PASSWORD PROTECTED)**  
**\* PDFs - 1 of 3**  
**\* Native files produced  
by R. Gregory Shepard**



**US**  
**v.**  
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**(PASSWORD PROTECTED)**  
**PDFs - 2 of 3**

