

JOHN W. HUBER, United States Attorney (#7226)  
JOHN K. MANGUM, Assistant United States Attorney (#2072)  
111 South Main Street, Ste. 1800  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682  
Email: john.mangum@usdoj.gov

ERIN HEALY GALLAGHER, *pro hac vice*  
DC Bar No. 985670, erin.healygallagher@usdoj.gov  
ERIN R. HINES, *pro hac vice*  
FL Bar No. 44175, erin.r.hines@usdoj.gov  
U.S. Department of Justice  
P.O. Box 7238  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 353-2452

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

---

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAPOWER-3, LLC, INTERNATIONAL  
AUTOMATED SYSTEMS, INC., LTB1,  
LLC, R. GREGORY SHEPARD,  
NELDON JOHNSON, and ROGER  
FREEBORN,

Defendants.

---

Civil No. 2:15-cv-00828 DN

**UNITED STATES' NOTICE OF EMAIL  
SUBMISSION WITH REDLINE  
DRAFT REGARDING  
CIVIL CONTEMPT ORDER  
(ECF NO. 701)**

Judge David Nuffer  
Magistrate Judge Evelyn J. Furse

Pursuant to this Court's bench order dated May 28, 2019 as reduced to writing in its Civil Contempt Order,<sup>1</sup> and its order extending certain deadlines,<sup>2</sup> please take notice that, on July 26, 2019, the United States submitted comments and a word-processing redline draft of a declaration by Neldon Johnson. Undersigned counsel submitted the email and redline draft to the Court, counsel for the Receiver, counsel for Neldon Johnson, counsel for Glenda Johnson, LaGrand Johnson, and Randale Johnson, and R. Gregory Shepard, *pro se*, who has consented in writing to receive service of documents by email.

The email and its attachment are filed with this notice.

Dated: July 26, 2019

Respectfully submitted,

/s/ Erin Healy Gallagher

ERIN HEALY GALLAGHER

DC Bar No. 985760

Email: erin.healygallagher@usdoj.gov

Telephone: (202) 353-2452

ERIN R. HINES

FL Bar No. 44175

Email: erin.r.hines@usdoj.gov

Telephone: (202) 514-6619

Trial Attorneys, Tax Division

U.S. Department of Justice

P.O. Box 7238

Ben Franklin Station

Washington, D.C. 20044

FAX: (202) 514-6770

**ATTORNEYS FOR THE  
UNITED STATES**

---

<sup>1</sup> ECF No. 701.

<sup>2</sup> ECF No. 725.

**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2019, the foregoing UNITED STATES' NOTICE OF EMAIL SUBMISSION WITH REDLINE DRAFT REGARDING CIVIL CONTEMPT ORDER (ECF NO. 701) was electronically filed with the Clerk of the Court through the CM/ECF system, which sent notice of the electronic filing to all counsel of record.

I also certify that, on the same date and consistent with his written consent, I served the same documents by email upon:

R. Gregory Shepard  
greg@rapower3.com.

*Defendant and respondent pro se*

/s/ Erin Healy Gallagher  
ERIN HEALY GALLAGHER  
Trial Attorney