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

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

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

Defendants.

Civil No. 2:15-cv-00828-DN-EJF

**DECLARATION REGARDING  
SOURCE OF FUNDS FOR FILINGS**

Judge David Nuffer

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Pursuant to this court's Corrected Receivership Order ECF 491, I hereby declare as follows:

1. Payment to Nelson, Snuffer, Dahle & Poulsen since the entry of the Corrected Receivership Order for attorneys' fees, expenses, or other costs have not been made from Receivership Property.
2. I have confirmed that since the time of the freeze order entered against the retainer funds paid to Nelson, Snuffer, Dahle & Poulsen, the balance of \$735,202.22 has been kept in the Trust Account of the law firm and no part of that has been used.

3. Nelson, Snuffer, Dahle & Poulsen have declared they have no intention to spend or allocate any part of the \$735,202.22 without a further order from the Court permitting use of those funds.
4. I am aware of a substantial amount of unpaid legal work that has not been paid and remains presently outstanding and owed to Nelson, Snuffer, Dahle & Poulsen for work related to the appeals and further proceedings before this Court.
5. The only funds paid to Nelson, Snuffer, Dahle & Poulsen since the freeze of their trust funds were paid by Robert Johnson from his separate funds totaling \$300,000 which were used to pay some of the legal fees incurred in representing the Defendants and other parties later added to the Receivership.
6. I believe this complies with the requirements of ECF 491 required of Defendants regarding source of funds.
7. **I declare under the penalty of perjury, that the foregoing is true and correct.**

DATED this 3<sup>rd</sup> day of December, 2019.

  
Neldon P. Johnson

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed using the court's CM/ECF filing system and that system sent notice of filing to all counsel and parties of record.

In addition, the foregoing was mailed or emailed as indicated to the following who are not registered with CM/ECF.

/s/ Steven R. Paul