

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., LTBI,
LLC, R. GREGORY SHEPARD,
NELDON JOHNSON, and ROGER
FREEBORN,

Defendants.

Civil No. 2:15-cv-00828 DN

**UNITED STATES' NOTICE OF EMAIL
SUBMISSION OF DRAFT ORDER
REGARDING UNITED STATES'
ORDER TO SHOW CAUSE
(ECF NO. 559)**

Judge David Nuffer
Magistrate Judge Evelyn J. Furse

Pursuant to this Court's bench order dated May 28, 2019, please take notice that, on June 10, 2019, the United States submitted a word-processing copy of a draft proposed opinion and order on the United States' motion for order to show cause why Neldon Johnson, R. Gregory Shepard, Glenda Johnson, LaGrand Johnson, and Randale Johnson should not be held in civil contempt of court for violating the Corrected Receivership Order.¹ Undersigned counsel submitted the draft by email 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 covering the draft, and the draft itself, are attached to this notice.

Dated: June 10, 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**

¹ ECF No. 559.

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2019, the foregoing UNITED STATES' NOTICE OF EMAIL SUBMISSION OF DRAFT ORDER REGARDING UNITED STATES' ORDER TO SHOW CAUSE ([ECF NO. 559](#)) and its supporting document 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