

Table of Comparison between Receivership Lawsuits

	Claims against LaGrand Johnson	Claims against Randale Johnson	Claims against Matthew Shepard	Claims against Steven Bowers
Demand	\$2,388,527.81	\$1,143,942.24	\$141,763.22	\$17,300
Basis	Checks made payable to LaGrand Johnson beginning January 6, 2005 in regular amounts that appear to be paychecks; checks made payable to LaGrand Johnson that appear to be reimbursement of costs/expenses paid by him for the benefit of IAS <sup>1</sup> or RaPower <sup>2</sup> ; checks made payable to LaGrand Johnson with “memo” description of “cash” checks made payable to LaGrand Johnson with “memo” description of “commission”; checks made payable to LaGrand Johnson with “memo” description of “Rasolargy”; other checks made payable to LaGrand Johnson without meaningful description or “memo”; payments on a trust deed note in the approximate amount of \$17,000	Checks made payable to Randale Johnson beginning January 4, 2005 in regular amounts that appear to be paychecks; checks made payable to Randale Johnson that appear to be reimbursement of costs/expenses paid by him for the benefit of IAS or RaPower; checks made payable to Randale Johnson with “memo” description of “commission”; other checks made payable to Randale Johnson without meaningful description or “memo”	Matt Shepard was knowledgeable about the operations of the Receivership Entities, sold lenses was an officer of Shepard Global and the son of Defendant Greg Shepard; Matt Shepard was an insider of Shepard Global; Receivership Entities were insolvent and Matt Shepard knew they were insolvent; Matt Shepard did not take the Transfers in good faith and did not transfer anything of a reasonably equivalent value for the Transfers; the Transfers were part of a fraud scheme	Bowers received \$17,300 from Shepard Global in bad faith at a time when Shepard Global was insolvent

---

<sup>1</sup>IAS = International Automated Systems, Inc.

<sup>2</sup>RaPower = RaPower-3, LLC

Claims for Relief	<p>First: Avoidance of Fraudulent Transfers (Insider and insolvent with intent to defraud creditors)</p> <p>Second: Avoidance of Fraudulent Transfers (Fraud scheme and less than reasonably equivalent value and “almost insolvent”)</p> <p>Third: Avoidance of Fraudulent Transfers (Less than Reasonably Equivalent Value and Insolvent)</p> <p>Fourth: Avoidance of Fraudulent Transfers (Insider, not antecedent debt and insolvent)</p> <p>Fifth: Breach of Fiduciary Duty (officer at IAS)</p> <p>Sixth: Unjust Enrichment (fraud scheme and lack of consideration)</p>	<p>First: Avoidance of Fraudulent Transfers (Insider and insolvent with intent to defraud creditors)</p> <p>Second: Avoidance of Fraudulent Transfers (Fraud scheme and less than reasonably equivalent value and “almost insolvent”)</p> <p>Third: Avoidance of Fraudulent Transfers (Less than Reasonably Equivalent Value and Insolvent)</p> <p>Fourth: Avoidance of Fraudulent Transfers (Insider, not antecedent debt and insolvent)</p> <p>Fifth: Breach of Fiduciary Duty (officer at IAS)</p> <p>Sixth: Unjust Enrichment (fraud scheme and lack of consideration)</p>	<p>First: Avoidance of Fraudulent Transfers (Insider and insolvent with intent to defraud creditors)</p> <p>Second: Avoidance of Fraudulent Transfers (Less than Reasonably Equivalent Value and “almost insolvent”)</p> <p>Third: Avoidance of Fraudulent Transfers (Less than Reasonably Equivalent Value and Insolvent)</p> <p>Fourth: Avoidance of Fraudulent Transfers (Insider, not antecedent debt and insolvent)</p> <p>Fifth: Breach of Fiduciary Duty (officer at Shepard Global)</p> <p>Sixth: Unjust Enrichment (fraud scheme and lack of consideration)</p>	<p>First: Avoidance of Fraudulent Transfers (Furtherance of fraud scheme and insolvent with actual intent to hinder, delay or defraud creditors)</p> <p>Second: Avoidance of Fraudulent Transfers (Less than Reasonably Equivalent Value and “almost insolvent”)</p> <p>Third: Avoidance of Fraudulent Transfers (Less than Reasonably Equivalent Value and Insolvent)</p> <p>Fourth: Unjust Enrichment (fraud scheme and lack of consideration)</p>