

Denver C. Snuffer, Jr. (#3032) denversnuffer@gmail.com
Steven R. Paul (#7423) spaul@nsdplaw.com
Daniel B. Garriott (#9444) dbgarrriott@msn.com
Joshua D. Egan (#15593) joshua.d.egan@gmail.com
NELSON, SNUFFER, DAHLE & POULSEN
10885 South State Street
Sandy, Utah 84070
Telephone: (801) 576-1400
Attorneys for Glenda Johnson

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

<p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>vs.</p> <p>RAPOWER-3, LLC, INTERNATIONAL AUTOMATED SYSTEMS, INC., LTB1, LLC, R. GREGORY SHEPARD, and NELDON JOHNSON,</p> <p>Defendants.</p>	<p>DECLARATION OF GLENDA JOHNSON IN RESPONSE TO NOTICE OF NONCOMPLIANCE ECF 923</p> <p>Civil No. 2:15-cv-00828-DN-EJF</p> <p>Judge David Nuffer</p>
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Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Glenda E. Johnson and I make this declaration under oath and based on my personal knowledge.
2. I hereby certify that I have complied to the best of my ability with the Court's Order Re: Affidavit of Non-Compliance against Glenda Johnson [ECF Doc. 920] (hereafter referred to as "Order Doc. 920"), and further certify as follows:
 - a. I received a copy of the Order Doc. 920 on or about May 5, 2020.

- b. Upon receipt of the Order Doc. 920 I immediately consulted with my legal counsel and began working to comply with the Court's order.
 - c. I directed the preparation of a Motion to Dismiss the Wings West LC lawsuit and filed the same with the clerk of the court for Millard County on May 5, 2020. I have not heard from counsel for Defendant whether it will oppose the motion.
 - d. I also directed my counsel to prepare a release of lien relating to the Wings West LC lawsuit.
 - e. On May 5th, I reached out to Preston Olsen one or two times, he signed the liens on behalf of Anstram Energy, LLC, at issue in the Receiver's Affidavit of Non-Compliance and which were directed to be released by the Court in Order Doc. 920.
 - f. I was unable to speak with Preston Olsen.
 - g. I knew that Preston Olsen was planning to sell his interest in Anstram Energy, LLC. to Roger Hamblin.
 - h. I called Roger Hamblin on May 5th and explained that I was ordered to release the liens that had been recorded in Millard County and in Texas and he said he would not release the liens.
3. I originally recorded the liens as an accommodation to Anstram Energy, LLC as it is an international company and I was local. I used my address for reference so that the county could reach me with any questions or concerns about the liens.
4. I am not an owner of Anstram Energy, LLC.
5. I do not have any management authority over Anstram Energy, LLC.
6. My lawyers have reached out to Roger Hamblin to request that he release the liens as required by the Court's Order. Attached is

a copy of the email sent from my lawyers to Roger Hamblin and his response refusing to release the liens.

7. I feel like I have done all that I can do to comply with the Court's order. I do not have the authority to release the liens in the name of Anstram Energy, LLC. I have sent the Court's order to Mr. Hamblin and asked him to release the liens.

I declare under the penalty of perjury, that the foregoing is true and correct.

DATED this 14th day of May, 2020.



Glenda E. 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

Steven R. Paul
Attorneys for Glenda Johnson

Rog Ham <4rogham@gmail.com>

5/14/2020 11:15 AM

Re: RaPower lawsuit and Glenda Johnson

To STEVEN PAUL <spaul@nsdplaw.com>

I am Not going to release the loan.
Roger Hamblin 5 -5-2020.

On Thu, May 14, 2020, 11:06 AM STEVEN PAUL <spaul@nsdplaw.com> wrote:

Roger,

Glenda Johnson has asked me to reach out to you to release the liens that were recorded for Anstram Energy, LLC in Millard County, Utah and Howard County, Texas. The Court, as you are aware, has determined that the liens were not authorized and ordered that Glenda release the liens.

She told us that she reached out to you last week and asked you to release the liens on behalf of Anstram Energy, LLC, as you are the current manager of that entity. She tells us that you are unwilling to release the liens.

I've attached a copy of the Court's Order (Doc. 920) and the Receiver's Affidavit of Non-Compliance outlining the arguments on which the court relied in ordering Mrs. Johnson to release the liens.

This is a very important matter and very time sensitive. Please let me know whether you will release the liens as ordered by the court.

Thank you.

Steven Paul

STEVEN R. PAUL
NELSON SNUFFER DAHLE & POULSEN, PC
10885 South State
Sandy, Utah 84070
(801) 576-1400 office
(801) 428-7031 mobile
spaul@nsdplaw.com