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**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

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

Defendants.

**RECEIVER'S NINTH QUARTERLY
STATUS REPORT**

*For the period October 1, 2020 to
December 31, 2020*

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

District Judge David Nuffer

R. Wayne Klein, the Court-Appointed Receiver (the "Receiver") of RaPower-3, LLC ("RaPower"), International Automated Systems, Inc. ("IAS"), and LTB1, LLC ("LTB1"), as well as 13 subsidiaries and affiliates (collectively, the "Receivership Entities"), and the assets of Neldon Johnson ("Johnson") and R. Gregory Shepard ("Shepard") (collectively "Receivership Defendants"), hereby submits this Ninth Quarterly Status Report ("Report") for the period from October 1, 2020 to December 31, 2020 ("Reporting Period").

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I. INTRODUCTION AND BACKGROUND

The Receivership Estate was created on October 31, 2018 with entry of the Court's *Receivership Order* ("Order"),¹ which, among other things, appointed the Receiver and continued a previously-entered asset freeze.² A May 3, 2019 order expanded the Receivership Estate to include 13 additional affiliated entities ("Affiliated Entities").³

Significant developments during the Reporting Period include sales of real properties, sales of equipment, a turnover order for half interest in Greg Shepard's home, the Receiver's discovery of additional vehicles owned by Neldon Johnson, the filing of summary judgment and default motions, the discovery of significant amounts of cyanide in a trailer on one of the properties, the freezing of financial accounts for Randale and LaGrand Johnson, and the Receiver's report and recommendation (including a motion for order to show cause) regarding property liens filed by Glenda Johnson on behalf of Anstram Energy.

II. ASSET RECOVERY, SETTLEMENTS

A. Order Requiring Turnover of Interest in Greg Shepard Residence. On December 7, 2020, the Court ruled that Greg Shepard owns a one-half interest in his residence, despite his claims that the property was owned exclusively by his wife's trust. The Court ordered Diana Shepard to execute a deed for half interest in the home to the Receiver and authorized the Receiver to sell the home.⁴ Greg Shepard has offered a cash payment to the Receiver in lieu of

¹ [Docket No. 490](#). A *Corrected Receivership Order* ("CRO"), which corrected formatting errors, was entered the following day. [Docket No. 491](#), filed November 1, 2018.

² *Memorandum Decision and Order Freezing Assets and to Appoint a Receiver*, [Docket No. 444](#), filed August 22, 2018.

³ [Docket No. 636](#), filed May 3, 2019. The Court overruled objections to this order. [Docket No. 718](#), filed July 8, 2019. Defendants appealed this order, which appeal was dismissed.

⁴ [Docket No. 1029](#), filed December 7, 2020.

selling the home. The Receiver and Shepard are engaged in negotiations over a possible settlement. In the interim, the Receiver has allowed Shepard to remain in the home.

B. Identification of Additional Vehicles Owned by Neldon Johnson. The Receiver has identified additional vehicles that were not disclosed by Neldon or Glenda Johnson. These include a vintage car, a heavy equipment road grader, a skidster, and a trailer. The Receiver is evaluating the condition and value of these vehicles in deciding how to dispose of them.

C. Obtaining Vehicle Titles. For a significant number of the vehicles the Receiver previously recovered from Neldon and Glenda Johnson, no titles were delivered. The Receiver gathered and submitted documentation to obtain title for ten of these vehicles in November 2020. This onerous additional documentation included photographs of each vehicle, VIN inspection certificates, applications for title, and ownership statements. The Utah Division of Motor Vehicles has not yet responded whether it will issue titles to the Receiver. The Receiver expects to gather and submit applications for title for additional vehicles where no titles were delivered.

D. Settlements. The Receiver's filed his seventh motion to approve settlements on December 15, 2020 ("Seventh Motion").⁵ The five settlements included in the Seventh Motion will bring in a total of \$60,800.00 when all required payments have been received. The Court has approved the Seventh Motion.⁶ During the quarter, the Receiver received \$26,587.00 on these and previous settlement agreements. The Receiver anticipates additional settlements in the coming months.

⁵ [Docket No. 1037](#), filed December 15, 2020.

⁶ [Docket No. 1059](#), filed January 4, 2021.

III. REAL PROPERTIES, SALE OF OTHER ASSETS

A. Home in Elk Ridge, Utah. With approval of the Court,⁷ the sale of this home closed on October 7, 2020. Net sales proceeds to the Receivership were \$416,195.77.⁸ The Receiver filed a notice of sale results summarizing the results of the sale.⁹

B. Taking Control of and Marketing Properties Turned Over by Glenda Johnson. Glenda Johnson turned over 14 properties to the Receiver in September 2020 pursuant to Court order.¹⁰ Five of them were improved properties, containing buildings. The Receiver has inspected each property and, for the improved properties, he made repairs, had the properties cleaned, sold furniture and equipment in the buildings, and obtained insurance on the properties. Each of the 14 properties has been listed for sale. As of the end of the Reporting Period, the Receiver has accepted purchase offers on 11 of them:

1. 40-Acre Property in Millard County (HD-3511-1). This property was appraised at \$17,000.00. After receiving an offer of \$17,000.00 for the property, the Receiver filed a motion seeking approval to sell the property at auction, with the \$17,000.00 offer constituting the opening bid at the auction.¹¹ The Court approved the sale of the property at auction and the language of the public notice to be given of the sale.¹² The auction was set for January 19, 2021 at 10:00 a.m., in Fillmore, Utah. After the end of the Reporting Period but before the auction, the buyer canceled his offer and

⁷ [Docket no. 1017](#), filed October 2, 2020.

⁸ Of this total, \$234,270.11 represents the amount of the mortgage the Receiver paid off before the property sold.

⁹ [Docket no. 1022](#), filed November 2, 2020.

¹⁰ [Docket no. 1007](#), filed September 15, 2020.

¹¹ [Docket no. 1023](#), filed November 9, 2020.

¹² [Docket no. 1027](#), filed December 1, 2020.

forfeited his earnest money deposit. The Receiver will report on this in the next status report.

2. 67.5-Acre Property in Millard County (HD-4606-2). This property contains scores of short solar towers. Like at the original tower site, none of these towers were connected to any electrical grid and there is no evidence any of them produced any electricity. The property also contained building materials and pipe. The Receiver sold much of the uninstalled pipe separately from the property. The property was appraised at \$18,563.00. The Receiver preliminarily accepted an offer of \$24,000.00 for the property and filed a motion seeking approval to sell the property at auction.¹³ The order was approved on December 1, 2020.¹⁴ The auction was held on January 19, 2021 at the Millard County courthouse. The property sold at auction for a higher bid. The Receiver will report on the results of this auction in the next status report.

3. Sherwood Shores Home (DO-SS-136&137). This home and three lots are located on the shore of Gunnison Bend Reservoir. The Receiver sold furniture in the home separately from the property and made repairs to the exterior of the home. The property was appraised at \$376,678.00. After receiving an offer of \$377,000.00, the Receiver filed a motion seeking approval to sell the property at auction.¹⁵ The Court approved the motion¹⁶ and the Receiver held an auction on January 26, 2020. The property sold at auction for a higher bid. The Receiver will report on the results of this auction in the next status report.

¹³ [Docket no. 1024](#), filed November 12, 2020.

¹⁴ [Docket no. 1028](#), filed December 1, 2020.

¹⁵ [Docket no. 1032](#), filed December 8, 2020.

¹⁶ [Docket no. 1048](#), filed December 23, 2020.

4. 1,120-Acres in Millard County (4805, 4806-A, 4806-B). A buyer offered \$278,000.00 for these three contiguous parcels of undeveloped land. The appraiser assigned a value of \$376,678.00 for the three properties, making the offer 86% of the appraised value. The Receiver filed a motion seeking approval to sell the property at auction,¹⁷ which the Court granted.¹⁸ The auction will be held on February 9, 2021. Because there are three different property parcels, if other bidders express an interest in bidding for only one or two of the parcels, the Receiver will conduct provisional auctions, to determine whether higher sales proceeds will be obtained by selling the parcels separately or as a combined group.

5. Payson, Utah Home. This large home on five acres of land in Payson, Utah needed significant work. The home had gone several months without water, had cracks in the foundation and sunken concrete, needed extensive work done on the exterior, and had broken appliances. The Receiver replaced the well pump, pipes, and appliances, and made other repairs. Three appraisals were obtained, assigning an average appraised value of \$925,000.00. The Receiver provisionally accepted an offer of \$950,000.00 for the property and filed a motion seeking approval for the sale.¹⁹ Unlike the properties in Millard County, this property will be sold in a “private sale,” meaning a) the Receiver was required to obtain three appraisals, b) instead of an auction, other potential bidders will have to offer a price at least 10% higher after notice of the sale is published, and c) the Court will have to hold a separate hearing to evaluate and approve

¹⁷ [Docket no. 1035](#), filed December 11, 2020.

¹⁸ [Docket no. 1052](#), filed December 29, 2020.

¹⁹ [Docket no. 1041](#), filed December 16, 2020.

the offer. The Court has set a hearing on the motion for February 9, 2021²⁰ and the Receiver has published notice of the proposed sale and the Court hearing.

6. 80-Acre Parcel, Millard County (HD-4648). This undeveloped land appraised at \$24,000.00. The Receiver provisionally accepted an offer of \$26,000.00 and filed a motion seeking approval to sell the property at public auction.²¹ The Court granted the motion²² and the Receiver will publish notice in the newspaper and conduct an auction on February 25, 2021.

7. Home and Workshop on 5-Acre Millard County Property (HD-4606-2-1). A home and workshop located on five acres in Abraham was appraised at \$247,313.00. The Receiver provisionally accepted an offer of \$230,000.00 for this property and filed a motion seeking approval to sell the property at auction.²³ The offer price is 93% of the appraised value. If the Court approves the motion, the Receiver will set an auction date in February and publish notice in the newspaper.

8. Payson, Utah Condominium. This condominium unit required extensive remodeling including painting and new carpeting. Three appraisals on the property averaged \$202,000.00. The Receiver provisionally accepted an offer of \$214,000.00 and filed a motion seeking approval to sell the property at a private sale.²⁴ The Court has set a hearing on the motion for February 9, 2021²⁵ and the Receiver has published notice of the proposed sale and the Court hearing.

²⁰ Docket no. 1069, filed January 25, 2021.

²¹ [Docket no. 1047](#), filed December 23, 2020.

²² Docket no. 1064, filed January 13, 2021.

²³ [Docket no. 1054](#), filed December 29, 2020.

²⁴ [Docket no. 1053](#), filed December 29, 2020.

²⁵ Docket no. 1069, filed January 25, 2021.

9. Newhall, California Condominium. This condominium also required extensive remodeling, including new carpet, painting, blinds, repairing cracks in the walls, new fireplace tile, and new bathroom fixtures and flooring. Three appraisals have been obtained, resulting in an average appraised value of \$375,000.00. The Receiver has provisionally accepted an offer of \$381,000.00 for the condominium and expects to file a motion for approval of a private sale in the near future.

C. Three Unsold Millard County Properties. The three other properties turned over to the Receiver by Glenda Johnson are a warehouse in Oasis, Utah, a 600-acre parcel of undeveloped land in Millard County, and a 360-acre parcel of undeveloped land in Millard County. No offers have yet been received on these properties; they continue to be marketed by the Receiver.

D. Hazardous Materials Identified. In preparing the Millard County properties for sale, the Receiver arranged to have a semi-truck trailer removed from one of the properties. In the process, it was discovered that the trailer contained numerous containers whose labels indicated potassium cyanide was in the containers. The Receiver has been in contact with the local fire marshal to verify the contents of the containers and determine the best method for disposition of the chemicals.

E. Greenbelt Rollback Notice. In December, the Millard County Assessor determined that Glenda Johnson had improperly claimed that two additional parcels of land in Delta (HD-3511 and HD-3511-1) were devoted to agricultural use. The Receiver paid \$7,124.75 in roll back property taxes on these two properties for the prior five years.

F. Four Remaining Millard County Properties Still Titled in Glenda Johnson's Name. There are four additional properties in Millard County titled in the name of Glenda Johnson that were not the subject of the Turnover Motion. Those properties are the subject of a separate lawsuit filed by the Receiver against Glenda Johnson, which litigation is ongoing.²⁶ As discussed below, in connection with his report and recommendation regarding asset liens Glenda Johnson recorded against Receivership Properties, the Receiver has asked the Court to require Glenda Johnson to bear the burden of demonstrating that those properties were purchased with funds that did not derive from the tax fraud scheme.

G. List of Properties in the Receivership Estate. Attached as Exhibit 1 is a table showing the status of all properties in the Receivership Estate as of December 31, 2020.

H. Sale of Other Assets. The Receiver engaged agents to sell furniture, equipment, tools, pipe, and construction equipment inside homes, in the Oasis warehouse, and scattered on the various properties. The agents consulted with manufacturing fabricators, auction houses, vendors, and former employees of Neldon Johnson in determining the condition of the equipment and the best method for selling those assets. These assets sold for \$188,452.00 to buyers from multiple states. The Receiver generally paid commissions of 20% for these sales.

IV. LITIGATION

A. Lawsuits Against Insiders. The Receiver has sued approximately a dozen insiders of Receivership Defendants, including family members, tax advisors, and former employees. While some of these defendants have approached the Receiver about settlements, the Receiver

²⁶ 2:19-cv-00625-DN-PK.

has been unwilling to accept the offers made by these defendants to date. As a result, all of these lawsuits are still ongoing.

B. Lawsuits Against Vendors. Of the lawsuits filed by the Receiver against credit card issuers and vendors, only two remain: the Receiver's lawsuit against Chase Bank for recovery of personal credit card charges paid by Receivership Entities and a lawsuit against Plaskolite for recovery of payments for plastic lenses after Plaskolite became aware of the U.S. Department of Justice lawsuit against RaPower. Both these cases are in the discovery phase.

C. Lawsuits Against Law Firms. The receiver filed suit against five different law firms to recover fees paid for legal work that benefitted persons other than Receivership Entities. One of those lawsuits, against an Oregon law firm, was settled during the quarter. In the lawsuit against Heideman & Associates, the law firm provided extensive documents in discovery which were reviewed by the Receiver. Attorneys for Nelson Snuffer have informed the Receiver that the firm may request an additional eight months to review and produce documents in discovery. The Receiver intends to explore alternatives to this lengthy extension of the trial schedule. The deposition of the attorney for another firm was delayed due to coronavirus concerns. The Receiver is attempting to reschedule that deposition and set a time to depose the lead attorney at Heideman.

D. Lawsuits Against Commission Recipients. The Receiver has sued scores of persons who received commissions for recommending the sales of the solar lens program to others. Approximately 40 of these defendants have settled with the Receiver previously.

1. Summary Judgment Motions. For most of these remaining commission lawsuits, the discovery periods have ended or will end soon. During the quarter, the

Receiver filed summary judgment lawsuits in approximately 24 of these cases. For three of these lawsuits, the defendants have filed papers opposing the Receiver's motions. The Receiver expects the other motions to be opposed. The Receiver will file replies. The Receiver hopes that some or most of these motions will be resolved during the quarter and expects to file motions against additional defendants in the coming months.

2. Default Judgments. The Receiver filed motions for default in another four cases during the Reporting Period. If these motions are granted, the Receiver expects to seek the Court's approval to assign these judgments to the U.S. Treasury for collection, in lieu of the Receiver spending Receivership funds to execute on the judgments.

V. INVESTIGATION

A. Bank and Retirement Account Records of LaGrand and Randale Johnson. On September 15, 2020, the Court granted the United States' motion requiring LaGrand and Randale Johnson to produce copies of account records for their bank and retirement accounts ("Records Order") and to notify those financial institutions that the funds in those accounts were to be frozen. On October 6, 2020, the Receiver filed a declaration describing Randale Johnson's failure to have financial institutions freeze account balances for certain accounts and failed to provide all required records for accounts under his control.²⁷ Randale Johnson filed a response, claiming that he was not required to have all accounts frozen.²⁸ The Receiver replied.²⁹

²⁷ [Docket no. 1018](#), filed October 6, 2020. The Receiver indicated that LaGrand Johnson appeared to have complied with the Records Order.

²⁸ [Docket no. 1020](#), filed October 8, 2020.

²⁹ [Docket no. 1049](#), filed December 24, 2020.

On December 29, 2020, the Court issued an order finding that Randale Johnson failed to comply with the Records Order.³⁰ Randale Johnson was ordered to deliver additional account records to the Receiver, direct two financial institutions to prevent further distributions from Randale Johnson's accounts, and restore one of the accounts to the balance that existed in March 2020.³¹

B. Liens Improperly Filed by Glenda Johnson Against Receivership Property.

Beginning in August 2019, Glenda Johnson recorded a series of liens against real properties titled in her name and against properties owned by IAS and the N.P. Johnson Family Limited Partnership. All of the properties on which the liens were filed were subject to the asset freeze of the CRO. The Court addressed her conduct in the contempt hearing on February 25, 2020 and numerous other orders. In August 2020, the Court directed the Receiver to conduct additional investigation, including taking the depositions of Roger Hamblin and Preston Olsen. The Receiver took their depositions and obtained records from regulatory bodies in the country of Nevis.

The Receiver filed a Report and Recommendation on December 29, 2020 describing the results of his investigation.³² The Report and Recommendation described the history of Court proceedings relating to the property liens, detailed actions taken by Glenda Johnson, Preston Olsen, and Roger Hamblin to interfere with the Receiver's work, and made recommendations to the Court. The Receiver filed an accompanying motion for an order to show cause why Glenda Johnson, Preston Olsen, and Roger Hamblin should not be held in civil contempt for violating

³⁰ [Docket no. 1057](#), filed December 29, 2020.

³¹ *Id.*

³² *Receiver's Report and Recommendation on Property Liens Glenda Johnson Granted to Anstram Energy and Violations of Corrected Receivership Order*, [Docket no. 1055](#), filed December 29, 2020.

the CRO.³³ In these filings, the Receiver asks the Court to find the three in contempt of court, require them to pay the costs of the Receiver's investigation, and order that Glenda Johnson bears the burden of demonstrating that the four remaining real properties titled in her name were purchased with funds unrelated to the tax fraud scheme.

C. Continuing Interference by Neldon and Glenda Johnson. During the Reporting Period, the Receiver identified additional instances of Neldon and Glenda Johnson's failure to comply with Court orders and interfering with the Receiver's ongoing work. These include Glenda Johnson's failure to deliver to the Receiver interest earned on the \$1.4 million she turned over in September 2020, her premature cancelation of insurance on properties she turned over to the Receiver, and her and Neldon Johnson's failure to deliver to the Receiver a list of personal items taken from properties she turned over to the Receiver. These were all specifically required by the property turnover order.³⁴ In addition, the Receiver requested that Glenda Johnson provide information on the location of a grand piano that was purchased with funds from Receivership Entities. She has failed to provide any information about the location or disposition of this asset. The Receiver is evaluating what actions to take regarding these additional violations of Court orders.

VI. FINANCIAL OPERATIONS OF THE RECEIVERSHIP ESTATE

A. Receipts and Disbursements. The tables below show the amount and source of funds brought into the Receivership Estate during the quarter and the categories of expenditures:

³³ [Docket no. 1056](#), filed December 29, 2020.

³⁴ [Docket no. 1007](#), filed September 15, 2020.

Revenue into the Receivership Estate	
Source of Revenue	Amount In
Real estate sale proceeds, refunds	\$417,833.24
Settlement payments	\$26,587.00
Asset sales (equipment, furniture)	\$188,452.00
Bank interest ³⁵	\$152.44
Total	\$633,024.68

Expenditures	
Type of Expenditure	Amount
Real estate: appraisals	\$14,200.00
Real estate: repairs, remodeling	\$50,165.72
Real estate: insurance	\$8,758.77
Real estate: utilities	\$4,885.59
Real estate: property taxes	\$29,799.59
Real estate: HOA dues	\$1,990.00
Commissions on asset sales	\$35,158.40
Operating expenses	\$689.10
Total	\$144,647.17

With Court approval,³⁶ professional fees in the amount of \$89,898.10, covering the three-month period from July through September 2020, were paid during the quarter to the Receiver, his counsel, conflict counsel, and the forensic accountants.

B. Bank Account Balances. The following table shows the balance of funds in the Receivership bank accounts at Wells Fargo Bank as of December 31, 2020:

Bank Account Balances	
Account	Amount
Checking account	\$51,559.82
High yield savings ³⁷	\$6,400,366.92
Total	\$6,451,926.72

³⁵ This abysmal amount represents an interest rate of 1/100th of 1% on funds in the savings account. Because the Receiver expects to soon pay this amount over to the U.S. Treasury, he has decided against evaluating other options.

³⁶ Docket no. 1045, filed December 21, 2020.

³⁷ This amount includes \$100,000 that the Turnover Order directed be preserved pending resolution of the Receiver's separate lawsuit against Glenda Johnson.

VII. NEXT STEPS

The significant next steps in the Receivership will be:

A. Sell Real Properties. Assuming the Court approves, the Receiver will sell the ten properties for which he has filed motions to sell the properties. He will file a motion to sell the California condominium. He will continue to market the three Millard County properties for which he has not yet received offers. He will take control of and sell the Shepard home unless an acceptable settlement agreement is reached early in 2021.

B. Ongoing and Potential Future Litigation. The Receiver will continue prosecuting the lawsuits he has filed, seeking summary judgments and default judgments when appropriate. Discovery efforts are expected to continue to require significant attention by the Receiver and his counsel, including taking depositions of attorneys who are being sued. The Receiver has at least one additional lawsuit he may file, where the statute of limitations has been waived.

C. Payments to U.S. Treasury, Disposition of Assets, Assignment of Judgments. The Receiver expects soon to begin paying to the U.S. Treasury excess funds in Receivership bank account. The Receiver also will consult with the United States in determining the appropriate disposition of patents and the turbine prototype. As the Receiver obtains judgments, he expects to seek Court approval to assign those to the United States.

D. Additional Recoveries from Insiders. The Receiver will continue his existing litigation against insiders and may seek additional recoveries from insiders, including contempt findings and financial recoveries relating to improper liens on real estate, funds in financial institution accounts held by LaGrand and Randale Johnson, and remedies relating to Glenda Johnson's continuing violations of Court orders.

E. Assist Other Government Agencies. With the consent of the United States, the Receiver expects to provide assistance to other government agencies who have requested information from the Receiver.

VIII. CONCLUSION

Great strides were made during the Reporting Period. Offers have been provisionally accepted on 11 properties held by the Receiver. Half interest in the Shepard home is property of the Receivership Estate and will be sold or released for equivalent cash. Furniture and equipment have been sold. Additional settlements were reached and settlement payments from prior settlements continue to be received. Turning points were reached in litigation against commission recipients with summary judgment motions and default motions being filed.

Significant work remains, but the objectives of the Receivership are being achieved.

The Receiver certifies that the information in this Ninth Quarterly Status Report is accurate to the best of his knowledge.

/s/ Wayne Klein
Wayne Klein
Receiver
(signed with permission)

DATED this 28th day of January 2021.

PARR BROWN GEE & LOVELESS

/s/ Michael S. Lehr
Jonathan O. Hafen
Michael S. Lehr
Attorneys for Receiver

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the above **RECEIVER'S NINTH QUARTERLY STATUS REPORT** was electronically filed with the Clerk of the Court through the CM/ECF system on January 28th, 2021, which sent notice of the electronic filing to all counsel of record. A copy was also sent to the below addresses via U.S. Mail:

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R. Gregory Shepard
858 CLOVER MEADOW DR
MURRAY, UT 84123

/s/ Michael S. Lehr