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*LTB1, and Neldon Johnson*

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., LTB1,  
LLC, R. GREGORY SHEPARD, and  
NELDON JOHNSON,

Defendants.

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

**DEFENDANT R. GREGORY  
SHEPARD'S VERIFIED RESPONSE  
TO ORDER ECF Doc. 505**

Judge David Nuffer

Pursuant to the Court's Order in Re: Civil Contempt of R. Gregory Shepard (ECF Doc. 505), Defendant R. Gregory Shepard does hereby respond as follows.

1. A complete accounting of the payment received from AXA Equitable Retirement Service Solutions, in the amount of \$27,126.065 (the "Funds"), is attached hereto as Exhibit 1, together with Tabs 1-16, which include all records and documentation of charges against the Funds which Shepard could obtain.

2. A complete accounting of all income received by Shepard, his wife, Diana, her mother, (Janie S. Smith) and Matt Shepard from September 1, 2018 through November 12, 2018 (the "Subject Period") is attached hereto as Exhibit 2, together with Tabs 1-3, which include all records and documentation of income during the Subject Period that Greg Shepard and Matt Shepard could obtain.
3. A complete accounting of all disbursements made to or for the benefit of any person residing in or at Shepard's home during the Subject Period is as follows:
  - a. Home mortgage payment to Nationwide Home Mortgage. Benefitted Mr. and Mrs. Shepard. See Exhibit 1, Tab 10.
  - b. Property tax and utility payments benefits Mr. and Mrs. Shepard. See Exhibit 1, Tabs 2, 9 and 12.
  - c. All vehicle leases are in Mr. Shepard's name only. See Exhibit 1, Tabs 5-8.
  - d. All but one credit card is in Mr. Shepard's name only. See Exhibit 1, Tabs 3, 4, 13, 14 and 16.
  - e. Mrs. Shepard holds a credit card with Bank of America. See Exhibit 1, Tab 15.
  - f. The cash withdrawals on October 15 and October 31 were used by Greg Shepard to pay for household expenses such as groceries, meals, medical/prescription costs, and other household expenses for the Shepard household.

4. The names of Mr. Shepard's household members:

Name	Address	Telephone	Email	SSN
Greg Shepard	858 Clover Meadow Dr. Murray, Utah 84123	(801) 699-2284	<a href="mailto:greg@rapower3.com">greg@rapower3.com</a>	██████████
Diana Shepard	Same	(801) 262-4478	None	██████████
Janie Smith	Same	None	None	██████████
Matt Shepard	Same	(801) 651-2183	<a href="mailto:matthew.shepard@gmail.com">matthew.shepard@gmail.com</a>	██████████
Heather Shepard	Same	(801) 440-2975	<a href="mailto:Shepard.family@googlemail.com">Shepard.family@googlemail.com</a>	██████████
Children: ES age 14 JS age 12 GS age 3				

DATED this 13<sup>th</sup> day of November, 2018.

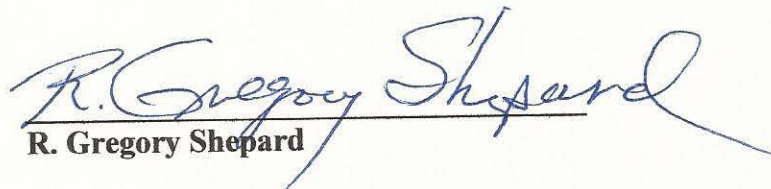
NELSON SNUFFER DAHLE & POULSEN

/s/ Steven R. Paul  
Denver C. Snuffer, Jr.  
Steven R. Paul  
Attorneys for Defendants

**VERIFICATION**

Pursuant to 28 U.S.C. § 1746, I hereby declare under the penalty of perjury, that the foregoing is true and correct.

Dated this 13<sup>th</sup> day of November, 2018.

  
R. Gregory Shepard

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **DEFENDANT R. GREGORY SHEPARD'S VERIFIED RESPONSE TO ORDER ECF Doc. 505** was sent to counsel for the United States in the manner described below.

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Erin R. Hines  
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/s/ Steven R. Paul  
*Attorneys for Defendants*