

# **Exhibit 11**

# People's Intermountain Bank

P.O. Box 307, American Fork, Utah 84003

Date 6/29/18  
Primary Account

Page 1  
1198



RAPOWER-3, LLC  
2730 W 4000 S  
OASIS UT 84624-9703

Check out your new interest rate! On most deposit accounts, we have increased the interest rates. For more information, contact a customer representative at 800-815-BANK or www.pi.bank.

CHECKING ACCOUNT(S)

BizSmart Commercial			76
Account Number	1198	Statement Dates	6/01/18 thru 7/01/18
Previous Balance	194,942.21	Days in the Statement Period	31
5 Deposits/Credits	137,289.00	Average Ledger Balance	113,531.14
73 Checks/Debits	291,693.44	Average Collected Bal.	113,531.14
Other Fees	7.00		
Interest Amount	.00		
Present Balance	40,530.77		

-----Other Fees-----

6/29	Below-Minimum-Balance Fee	7.00
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-----Deposits and Other Increases to Checking-----

Date	Description	Amount
6/18	Regular Deposit	16,612.00
6/18	Regular Deposit	70,703.00
6/25	Regular Deposit	7,740.00
6/27	Trsf from Glenda Savings	20,000.00
	R&D Expenses	
	Confirmation number 627180326	
6/28	Regular Deposit	22,234.00

-----Other Decreases to Checking-----

Date	Description	Amount
6/22	Transf to Cobblestone Savings	140,000.00-
	Confirmation number 622181486	
6/29	Fee (see above)	7.00-SC



Date 6/29/18 Page 2  
 Primary Account 1198

BizSmart Commercial 1198 (Continued)

Regular Checks					
Date	Check No	Amount	Date	Check No	Amount
6/15	10653	13.65	6/15	10915*	124.50
6/13	10691*	66.15	6/14	10916	576.15
6/15	10696*	10.51	6/13	10917	42.00
6/13	10736*	230.65	6/15	10918	200.00
6/15	10749*	91.35	6/14	10919	128.50
6/15	10785*	50.00	6/15	10920	803.65
6/07	10787*	21.00	6/15	10921	4,421.45
6/06	10818*	33.00	6/15	10922	182.00
6/18	10831*	26.25	6/12	10923	82.04
6/11	10832	26.30	6/21	10924	3,782.00
6/15	10835*	78.75	6/18	10925	374.20
6/12	10862*	5.00	6/13	10926	18.50
6/04	10872*	483.00	6/25	10927	756.00
6/20	10874*	84.00	6/13	10929*	300.00
6/11	10886*	660.00	6/14	10931*	173.00
6/04	10888*	4,352.50	6/13	10932	2,732.00
6/08	10889	1,041.48	6/13	10933	811.35
6/04	10890	13,074.26	6/14	10934	803.65
6/08	10891	16,195.26	6/14	10936*	425.69
6/05	10892	500.00	6/28	10937	88.50
6/11	10893	8,625.00	6/12	10938	400.00
6/14	10894	801.35	6/12	10939	20.00
6/12	10895	30.00	6/14	10940	2.00
6/14	10896	124.50	6/20	10942*	8.85
6/18	10897	8.85	6/25	10943	577.50
6/20	10898	8.85	6/18	10944	895.85
6/15	10900*	140.00	6/12	10945	8,099.96
6/20	10901	154.00	6/14	10946	945.00
6/21	10902	273.80	6/13	10947	94.50
6/13	10905*	576.15	6/15	10950*	3,000.00
6/12	10907*	30.00	6/20	10951	85.00
6/19	10908	945.00	6/19	10952	23,351.25
6/12	10910*	661.50	6/18	10953	6,900.00
6/13	10911	45.50	6/19	10954	29,323.25
6/12	10912	2,926.45	6/19	10955	352.50
6/18	10913	12.50	6/29	10958*	8,300.00

Daily Balance Summary					
Date	Balance	Date	Balance	Date	Balance
6/01	104,942.21	6/12	137,785.42	6/21	140,485.77
6/04	177,692.43	6/13	132,812.62	6/22	183,277
6/05	176,692.48	6/14	128,832.78	6/25	6,802.77
6/06	176,549.45	6/15	119,718.92	6/27	26,892.77
6/07	176,548.45	6/18	198,334.27	6/28	49,037.77
6/08	130,301.70	6/19	144,842.77	6/29	30,510.77
6/11	149,990.41	6/20	144,501.57		



# **Exhibit 11-1**

# People's Intermountain Bank

P.O. Box 307, American Fork, Utah 84003

Date 6/29/18  
Primary Account

Page 1  
1206



COBBLESTONE CENTRE, L.C.  
2730 W 4000 S  
OASIS UT 84624-9703

Check out your new interest rate! On most deposit accounts, we have increased the interest rates. For more information, contact a customer representative at 800-815-BANK or www.pi.bank.

-----Summary of Accounts-----

Account Number	Account Title	Your Present Balance Is
1206	BizSmart Commercial	54,643.85
3739	BizSmart Savings	140,637.42

CHECKING ACCOUNT(S)

BizSmart Commercial			20
Account Number	1206	Statement Dates	6/01/18 thru 7/01/18
Previous Balance	77,941.72	Days in the Statement Period	31
1 Deposits/Credits	100,000.00	Average Ledger Balance	54,618.29
47 Checks/Debits	123,297.87	Average Collected Bal.	54,618.29
Other Fees	.00		
Interest Amount	.00		
Present Balance	54,643.85		

	Total For This Period	Total Year-to-Date
Total overdraft fees	\$ .00	\$25.00
Total returned item fees	\$ .00	\$ .00

-----Deposits and Other Increases to Checking-----

Date	Description	Amount
6/18	Trsf from Cobblestone Savings	100,000.00
	Expenses	
	Confirmation number 618180407	



Date 6/29/18  
Primary AccountPage 2  
1206

BizSmart Commercial

1206 (Continued)

-----Other Decreases to Checking-----

Date	Description	Amount
6/04	RIDGESTONE HOA I1260398189PPD HOA dues	220.00-
6/05	Glenda E Johnson 132 UTAH801/297-7703 TAX PAYMNT 1275657728	1,902.95-
6/05	WCF OF UTAH ELECT ACH 8870407018 00004634400L	2,113.00-
6/05	INTUIT PAYROLL S QUICKBOOKS 1722616679 464030485	22,216.72-
6/06	ROCKYMTN/PACIFIC POWER BILL 1930246090 705108071ACHPAY	1,308.31-
6/07	NWEDI-924356870 EDI PYMNTS FLEX0000695200	1,558.77-
6/11	FRONTIER ONLINE E-BILL 75766355	36.98-
6/11	DELTA GARBAGE SE SALE 9215986202	40.00-
6/11	IRS USATAXPYMT 3387702000 225856220210020	4,918.90-
6/12	QuestarGas QuestarGas 3006311000	212.87-
6/14	AFLAC INSURANCE 2580663085 EJ802961098	100.62-
6/18	CHASE CREDIT CRD EPAY 3629117944	9,474.93-
6/19	INTUIT PAYROLL S QUICKBOOKS 1722616679 464030485	22,362.23-
6/20	Dominion Energy 1870155877PPD QGC Cobblestone Centre	18.41-
6/20	Dominion Energy 1870155877PPD QGC	70.93-
6/22	Neldon Johnson SESD ELECTRIC DEBITS 86423202XA	55.47-
6/25	FRONTIER ONLINE E-BILL 76878393	48.34-
6/25	RISE BROADBAND EFT PAYMT 0010143819 SPA	80.25-
6/25	CAPITAL ONE ONLINE PMT 9279744991 817339910004584	322.03-



Date 6/29/18  
 Primary Account

Page 3  
 1206

BizSmart Commercial 1206 (Continued)

-----Other Decreases to Checking-----

Date	Description	Amount
6/25	CHRYSLER CAPITAL9191691407PPD PAYMENT	605.35-
6/25	GLENDA JOHNSON DISCOVER E-PAYMENT 6354	2,111.93-
6/25	IRS USATAXPYMT 3387702000 225857620081145	5,000.04-
6/25	CITI CARD ONLINE PAYMENT 122678797594254	5,093.76-
6/28	BEEHIVE ACCOUNTI SALE 9215986202	100.00-
6/28	ROCKYMTN/PACIFIC POWER BILL 1930246090 991372221ACHPAY	714.68-
6/28	ROCKYMTN/PACIFIC POWER BILL 1930246090 542666670ACHPAY	965.31-
6/29	PAYSON CITY CORP1876000262PPD CUST PMTS JOHNSON, GLENDA & NELD	30.58-

-----Regular Checks-----

Date	Check No	Amount	Date	Check No	Amount
6/11	4180	3,520.00	6/20	4190	30.00
6/01	4181	200.00	6/12	4191	549.58
6/01	4182	763.05	6/12	4192	52.50
6/04	4183	2,557.73	6/14	4193	342.00
6/01	4184	3,566.50	6/13	4194	1,096.27
6/07	4185	2,565.76	6/20	4195	200.00
6/05	4186	505.91	6/27	4196	160.20
6/13	4187	357.90	6/21	4197	18,423.10
6/12	4188	1,943.46	6/28	4198	219.44
6/20	4189	3,224.87	6/28	4199	1,336.24

-----Daily Balance Summary-----

Date	Balance	Date	Balance	Date	Balance
6/01	73,412.17	6/12	27,188.73	6/21	71,487.47
6/04	70,634.44	6/13	25,734.56	6/22	71,432.00
6/05	43,895.86	6/14	25,291.94	6/25	58,170.30
6/06	42,587.55	6/18	115,817.01	6/27	58,010.10
6/07	38,463.02	6/19	93,454.78	6/28	54,674.43
6/11	29,947.14	6/20	89,910.57	6/29	54,643.85

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SAVINGS ACCOUNT(S)



Date 6/29/18 Page 4  
 Primary Account 1206

<b>BizSmart Savings</b>		Statement Dates	6/01/18 thru 7/01/18
Account Number	3739	Days in the Statement Period	31
Beginning Balance	2,045,503.33	Average Ledger Balance	1,417,922.68
1 Deposits/Credits	140,000.00	Average Collected Bal.	1,417,922.68
2 Checks/Debits	2,045,500.00	Interest Earned	253.18
Other Fees	.00	Annual Percentage Yield Earned	0.21%
Interest Amount	634.09	2018 Interest Paid	1,255.64
Present Balance	140,637.42		

-----Transactions-----

Date	Description	Amount	Balance
6/18	Transf to COBBLESTONE CENTRE Expenses Confirmation number 618180407	100,000.00-	1,945,503.33
6/22	Trsf from RaPower3 Confirmation number 622181486	140,000.00	2,085,503.33
6/22	Transf to Glenda Savings Confirmation number 622181480	1,945,500.00-	140,003.33
7/01	Interest Deposit	634.09	140,637.42





## **Exhibit 11-2**

# People's Intermountain Bank

P.O. Box 307, American Fork, Utah 84003

Date 7/02/18  
Primary Account

Page 1  
2790



GLEND A E JOHNSON  
POD  
2730 W 4000 S  
OASIS UT 84624-9703

Check out your new interest rate! On most deposit accounts, we have increased the interest rates. For more information, contact a customer representative at 800-815-BANK or [www.pi.bank](http://www.pi.bank).

SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	2790	Statement Dates	6/04/18 thru 7/02/18
Beginning Balance	149,275.60	Days in the Statement Period	29
3 Deposits/Credits	2,067,000.00	Average Ledger Balance	995,172.15
2 Checks/Debits	50,000.00	Average Collected Bal.	995,172.15
Other Fees	.00	Interest Earned	798.68
Interest Amount	798.68	Annual Percentage Yield Earned	1.01%
Present Balance	2,167,074.28	2018 Interest Paid	1,030.83

-----Transactions-----

Date	Description	Amount	Balance
6/06	Trsf from Neldon Savings	1,500.00	150,775.60
	Confirmation number 606180976		
6/06	Trsf from IAS consulting	120,000.00	270,775.60
	Confirmation number 606180973		
6/22	Trsf from Cobblestone Savings	1,945,500.00	2,216,275.60
	Confirmation number 622181480		
6/27	Transf to RaPower3 R&D Expenses	20,000.00-	2,196,275.60
	Confirmation number 627180326		
7/02	Interest Deposit	798.68	2,197,074.28
7/02	Transf to Glenda Abraham House Stucco	30,000.00-	2,167,074.28
	Confirmation number 702183002		

BANKOFAMERICANFORK-003546





# People's Intermountain Bank

P.O. Box 307, American Fork, Utah 84003

Date 9/04/18  
Primary Account

Page 1  
2790

  
 GLENDA E JOHNSON  
 POD  
 2730 W 4000 S  
 OASIS UT 84624-9703

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SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	2790	Statement Dates	8/02/18 thru 9/04/18
Beginning Balance	2,169,024.56	Days in the Statement Period	34
Deposits/Credits	.00	Average Ledger Balance	2,085,201.03
2 Checks/Debits	250,000.00	Average Collected Bal.	2,085,201.03
Other Fees	.00	Interest Earned	2,126.81
Interest Amount	2,126.81	Annual Percentage Yield Earned	1.10%
Present Balance	1,921,151.37	2018 Interest Paid	5,107.92

-----Transactions-----

Date	Description	Amount	Balance
8/03	Transf to COBBLESTONE CENTRE Payment	50,000.00-	2,119,024.56
	Confirmation number 803180026		
8/30	Transf to Glenda family	200,000.00-	1,919,024.56
	Confirmation number 830180700		
9/04	Interest Deposit	2,126.81	1,921,151.37

BANKOFAMERICANFORK-003548



**People's Intermountain Bank**

P.O. Box 307, American Fork, Utah 84003

Date 10/01/18 Page 1  
 Primary Account [REDACTED] 2790

GLEND A E JOHNSON  
 POD  
 2730 W 4000 S  
 OASIS UT 84624-9703

Have you used your free visual budgeting tools? It's almost fun.  
 Explore Money Manager on the app and online banking, stop by, or  
 call customer care at 800-815-BANK.

SAVINGS ACCOUNT(S)

Notice of Change in Terms: The annual percentage yield for this account has increased based on new daily balance tiers as follows: < \$20,000, 0.50%; \$20,000 - \$99,999.99, 0.50%; \$100,000 - \$249,999.99, 0.55%; \$250,000 - \$499,999.99, 0.65%; \$500,000 - \$999,999.99, 0.85%; \$1 million and up, 1.10%. These are the APYs for the entire balance in the account.

SaveSmart Direct			
Account Number	[REDACTED] 2790	Statement Dates	9/05/18 thru 10/01/18
Beginning Balance	1,921,151.37	Days in the Statement Period	27
Deposits/Credits	.00	Average Ledger Balance	1,921,151.37
Checks/Debits	.00	Average Collected Bal.	1,921,151.37
Other Fees	.00	Interest Earned	1,556.06
Interest Amount	1,556.06	Annual Percentage Yield Earned	1.10%
Present Balance	1,922,707.43	2018 Interest Paid	6,663.98

-----Transactions-----			
Date	Description	Amount	Balance
10/01	Interest Deposit	1,556.06	1,922,707.43

BANKOFAMERICANFORK-003549



**People's Intermountain Bank**

P.O. Box 307, American Fork, Utah 84003

Date 11/01/18 Page 1  
 Primary Account [REDACTED] 2790

GLEND A E JOHNSON  
 POD  
 2730 W 4000 S  
 OASIS UT 84624-9703

We have 26 locations where you'll get friendly, local people, who are anxious to help. Access your account from Preston, Idaho to St. George, Utah. Visit pi.bank/locations.

SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	[REDACTED] 2790	Statement Dates	10/02/18 thru 11/01/18
Beginning Balance	1,922,707.43	Days in the Statement Period	31
Deposits/Credits	.00	Average Ledger Balance	1,552,382.13
2 Checks/Debits	410,003.00	Average Collected Bal.	1,552,382.13
Other Fees	.00	Interest Earned	1,443.65
Interest Amount	1,443.65	Annual Percentage Yield Earned	1.10%
Present Balance	1,514,148.08	2018 Interest Paid	8,107.63

-----Transactions-----

Date	Description	Amount	Balance
10/05	SAVESMART TRANSACTION FEE	3.00-	1,922,704.43
10/05	FROM 2790 TO 1808 PER GLEND A	410,000.00-	1,512,704.43
11/01	Interest Deposit	1,443.65	1,514,148.08

BANKOFAMERICANFORK-003550



**People's Intermountain Bank**

P.O. Box 307, American Fork, Utah 84003

Date 12/03/18  
Primary Account

Page 1  
2790

GLEND A E JOHNSON  
POD  
2730 W 4000 S  
OASIS UT 84624-9703

Whether you need a home loan, a business loan, or just a familiar face to answer your banking questions, we're here for you. We wish you a wonderful holiday season and a very prosperous new year.

SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	2790	Statement Dates	11/02/18 thru 12/03/18
Beginning Balance	1,514,148.08	Days in the Statement Period	32
Deposits/Credits	.00	Average Ledger Balance	1,471,023.08
2 Checks/Debits	45,000.00	Average Collected Bal.	1,471,023.08
Other Fees	.00	Interest Earned	1,412.11
Interest Amount	1,412.11	Annual Percentage Yield Earned	1.10%
Present Balance	1,470,560.19	2018 Interest Paid	9,519.74

-----Transactions-----

Date	Description	Amount	Balance
11/02	Transf to Glenda Property taxes Confirmation number 1102181928	25,000.00-	1,489,148.08
11/05	Transf to Glenda Property taxes Confirmation number 1105182161	20,000.00-	1,469,148.08
12/03	Interest Deposit	1,412.11	1,470,560.19

BANKOFAMERICANFORK-003551



# People's Intermountain Bank

P.O. Box 307, American Fork, Utah 84003

Date 1/02/19  
Primary Account

Page 1  
[REDACTED] 2790

GLEND A E JOHNSON  
POD  
2730 W 4000 S  
OASIS UT 84624-9703

Our family of business checking accounts offers a range of services and benefits for businesses of all sizes.

### SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	[REDACTED] 2790	Statement Dates	12/04/18 thru 1/02/19
Beginning Balance	1,470,560.19	Days in the Statement Period	30
Deposits/Credits	.00	Average Ledger Balance	1,440,226.85
1 Checks/Debits	70,000.00	Average Collected Bal.	1,440,226.85
Other Fees	.00	Interest Earned	1,296.15
Interest Amount	1,296.15	Annual Percentage Yield Earned	1.10%
Present Balance	1,401,856.34	2019 Interest Paid	1,296.15

-----Transactions-----			
Date	Description	Amount	Balance
12/21	Transf to Glenda expenses Confirmation number 1221181066	70,000.00-	1,400,560.19
1/02	Interest Deposit	1,296.15	1,401,856.34

BANKOFAMERICANFORK-003552





**People's Intermountain Bank**

P.O. Box 307, American Fork, Utah 84003

Date 2/01/19 Page 1  
 Primary Account [REDACTED] 2790

GLEND A E JOHNSON  
 POD  
 2730 W 4000 S  
 OASIS UT 84624-9703

Our family of business checking accounts offers a range of services and benefits for businesses of all sizes.

SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	[REDACTED] 2790	Statement Dates	1/03/19 thru 2/03/19
Beginning Balance	1,401,856.34	Days in the Statement Period	32
Deposits/Credits	.00	Average Ledger Balance	1,401,856.34
Checks/Debits	.00	Average Collected Bal.	1,401,856.34
Other Fees	.00	Interest Earned	1,345.72
Interest Amount	1,345.72	Annual Percentage Yield Earned	1.10%
Present Balance	1,403,202.06	2019 Interest Paid	2,641.87

-----Transactions-----

Date	Description	Amount	Balance
2/03	Interest Deposit	1,345.72	1,403,202.06



**People's Intermountain Bank**

P.O. Box 307, American Fork, Utah 84003

Date 3/01/19 Page 1  
 Primary Account [REDACTED] 2790

GLENDA E JOHNSON  
 POD  
 2730 W 4000 S  
 OASIS UT 84624-9703

Our family of business checking accounts offers a range of services and benefits for businesses of all sizes.

SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	[REDACTED] 2790	Statement Dates	2/04/19 thru 3/03/19
Beginning Balance	1,403,202.06	Days in the Statement Period	28
Deposits/Credits	.00	Average Ledger Balance	1,403,202.06
Checks/Debits	.00	Average Collected Bal.	1,403,202.06
Other Fees	.00	Interest Earned	1,178.64
Interest Amount	1,178.64	Annual Percentage Yield Earned	1.10%
Present Balance	1,404,380.70	2019 Interest Paid	3,820.51

-----Transactions-----

Date	Description	Amount	Balance
3/03	Interest Deposit	1,178.64	1,404,380.70

BANKOFAMERICANFORK-003554



**People's Intermountain Bank**

P.O. Box 307, American Fork, Utah 84003

Date 4/01/19  
Primary Account

Page 1  
2790

GLEND A E JOHNSON  
POD  
2730 W 4000 S  
OASIS UT 84624-9703

Our family of business checking accounts offers a range of services and benefits for businesses of all sizes.

SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	2790	Statement Dates	3/04/19 thru 4/01/19
Beginning Balance	1,404,380.70	Days in the Statement Period	29
Deposits/Credits	.00	Average Ledger Balance	1,328,518.63
1 Checks/Debits	200,000.00	Average Collected Bal.	1,328,518.63
Other Fees	.00	Interest Earned	1,155.75
Interest Amount	1,155.75	Annual Percentage Yield Earned	1.10%
Present Balance	1,205,536.45	2019 Interest Paid	4,976.26

-----Transactions-----			
Date	Description	Amount	Balance
3/22	Transf to Folks	200,000.00-	1,204,380.70
	Confirmation number 322190618		
4/01	Interest Deposit	1,155.75	1,205,536.45

BANKOFAMERICANFORK-003555



**People's Intermountain Bank**

P.O. Box 307, American Fork, Utah 84003

Date 5/01/19 Page 1  
 Primary Account [REDACTED] 2790

GLEND A E JOHNSON  
 POD  
 2730 W 4000 S  
 OASIS UT 84624-9703

Our family of business checking accounts offers a range of services and benefits for businesses of all sizes.

SAVINGS ACCOUNT(S)

SaveSmart Direct			
Account Number	[REDACTED] 2790	Statement Dates	4/02/19 thru 5/01/19
Beginning Balance	1,205,536.45	Days in the Statement Period	30
Deposits/Credits	.00	Average Ledger Balance	1,205,536.45
Checks/Debits	.00	Average Collected Bal.	1,205,536.45
Other Fees	.00	Interest Earned	1,084.94
Interest Amount	1,084.94	Annual Percentage Yield Earned	1.10%
Present Balance	1,206,621.39	2019 Interest Paid	6,061.20

-----Transactions-----

Date	Description	Amount	Balance
5/01	Interest Deposit	1,084.94	1,206,621.39

BANKOFAMERICANFORK-003556



## **Exhibit 11-3**

Divisions of  
People's  
Intermountain  
Bank



Account: Glenda Savings Current Time: 04/27/19 4:03:30 PM

Available Balance: \$1,205,536.45

Date	Ref/Check No	Description	Debit	Credit	Balance
04/01/2019		Interest Deposit		\$1,155.75	\$1,205,536.45
03/22/2019	322190618	Transf to Folks Confirmation number 322190618	\$200,000.00		\$1,204,380.70
03/03/2019		Interest Deposit		\$1,178.64	\$1,404,380.70
02/03/2019		Interest Deposit		\$1,345.72	\$1,403,202.06
01/02/2019		Interest Deposit		\$1,296.15	\$1,401,856.34
12/21/2018	1221181066	Transf to Glenda expenses Confirmation number 1221181066	\$70,000.00		\$1,400,560.19
12/03/2018		Interest Deposit		\$1,412.11	\$1,470,560.19
11/05/2018	1105182161	Transf to Glenda Property taxes Confirmation number 1105182161	\$20,000.00		\$1,469,148.08
11/02/2018	1102181928	Transf to Glenda Property taxes Confirmation number 1102181928	\$25,000.00		\$1,489,148.08
11/01/2018		Interest Deposit		\$1,443.65	\$1,514,148.08
10/05/2018		FROM 2790 TO 1808 PER GLENDA	\$410,000.00		\$1,512,704.43
10/05/2018		SAVESMART TRANSACTION FEE	\$3.00		\$1,922,704.43
10/01/2018		Interest Deposit		\$1,556.06	\$1,922,707.43
09/04/2018		Interest Deposit		\$2,126.81	\$1,921,151.37
08/30/2018	830180700	Transf to Glenda family Confirmation number 830180700	\$200,000.00		\$1,919,024.56
08/03/2018	803180026	Transf to COBBLESTONE CENTRE Payment Confirmation number 803180026	\$50,000.00		\$2,119,024.56
08/01/2018		Interest Deposit		\$1,950.28	\$2,169,024.56
07/02/2018		Interest Deposit		\$798.68	\$2,167,074.28
07/02/2018	702183002	Transf to Glenda Abraham House Stucco Confirmation number 702183002	\$30,000.00		\$2,166,275.60
06/27/2018	627180326	Transf to RaPower3 R&D Expenses Confirmation number 627180326	20,000.00 \$20,000.00		\$2,196,275.60
06/22/2018	622181480	Trsf from Cobblestone Savings Confirmation number 622181480		\$1,945,500.00	\$2,216,275.60
06/06/2018	606180973	Trsf from IAS consulting Confirmation number 606180973		\$120,000.00	\$270,775.60
06/06/2018	606180976	Trsf from Neldon Savings Confirmation number 606180976		\$1,500.00	\$150,775.60
06/03/2018		Interest Deposit		\$66.51	\$149,275.60
05/04/2018	View Image	Regular Deposit		\$425.98	\$149,209.09
05/04/2018		FROM 9233 TO 2790 PER GLENDA		\$4,000.00	\$148,783.11
05/01/2018		Interest Deposit		\$56.79	\$144,783.11
04/02/2018		Interest Deposit		\$64.51	\$144,726.32

\*

03/08/2018	308181235	Transf to Glenda Pay of Texas land Confirmation number 308181235	-523,000.00		\$144,661.81
03/01/2018		Interest Deposit		\$23.54	\$167,661.81
02/23/2018	View Image	Regular Deposit		\$138,000.00	\$167,638.27
02/16/2018	216180380	Trsf from Neldon savings Confirmation number 216180380		\$4,000.00	\$29,638.27
02/01/2018		Interest Deposit		\$10.40	\$25,638.27
01/02/2018		Interest Deposit		\$10.40	\$25,627.87
12/03/2017		Interest Deposit		\$10.87	\$25,617.47
11/10/2017	1110171033	Trsf from Neldon savings Confirmation number 1110171033		\$2,000.00	\$25,606.60
11/01/2017		Interest Deposit		\$9.58	\$23,606.60
10/02/2017		Interest Deposit		\$9.22	\$23,597.02
09/26/2017	926170188	Transf to Glenda Land Payment Confirmation number 926170188	-51,000.00		\$23,587.80
09/04/2017		Interest Deposit		\$11.31	\$24,587.80
08/01/2017		Interest Deposit		\$11.35	\$24,576.49
07/12/2017	712170613	Transf to Senior 0002 for car pay off Confirmation number 712170613	28,000.00 -23,000.00		\$24,565.14
07/12/2017	712170609	Trsf from Senior 0003 for car pay off Confirmation number 712170609		\$1,400.00	\$47,565.14
07/04/2017		Interest Deposit		\$20.61	\$46,165.14
06/01/2017		Interest Deposit		\$19.35	\$46,144.53
05/01/2017		Interest Deposit		\$17.47	\$46,125.18
<b>Totals:</b>		<b>Transactions: 46</b>	<b>Debits: -51,072,003.00</b>	<b>Credits: \$2,231,431.74</b>	

## **Exhibit 11-4**



**Divisions of People's Intermountain Bank**

**LSB LEWISTON STATE BANK**



**Bank of American Fork.**



**PEOPLE'S Town & Country BANK**

Date 8/01/19 Page 1  
 Primary Account XXXXXXXXXXXX 2790

GLEND A E JOHNSON  
 POD  
 2730 W 4000 S  
 OASIS UT 84624-9703

Our family of business checking accounts offers a range of services and benefits for businesses of all sizes.

**SAVINGS ACCOUNT(S)**

SAVESMART DIRECT		STATEMENT DATES	7/02/19 THRU	8/01/19
ACCOUNT NUMBER	XXXXXXXXXXXX 2790	DAYS IN THE STATEMENT PERIOD		31
BEGINNING BALANCE	1,208,830.41	AVERAGE LEDGER BALANCE		1,208,830.41
DEPOSITS/CREDITS	.00	AVERAGE COLLECTED BAL.		1,208,830.41
CHECKS/DEBITS	.00	INTEREST EARNED		1,124.16
OTHER FEES	.00	ANNUAL PERCENTAGE YIELD EARNED		1.10%
INTEREST AMOUNT	1,124.16	2019 INTEREST PAID		9,394.38
PRESENT BALANCE	1,209,954.57			

**TRANSACTIONS**

DATE	DESCRIPTION	AMOUNT	BALANCE
8/01	Interest Deposit	1,124.16	1,209,954.57



## **Exhibit 11-5**

**Divisions of People's Intermountain Bank**



**Bank of American Fork.**



**PEOPLE'S Town & Country BANK**

Date 8/09/19 Page 1  
 Primary Account XXXXXXXXXXXX 8749

NORMAN FENN  
 ELDORIS FENN  
 GLENDA E JOHNSON; ANN F STRASBURG  
 2730 W 4000 S  
 OASIS UT 84624-9703

Our family of business checking accounts offers a range of services and benefits for businesses of all sizes.

**SUMMARY OF ACCOUNTS**

ACCOUNT NUMBER	ACCOUNT TITLE	YOUR PRESENT BALANCE IS
XXXXXXXXXXXX 8749	CheckSmart Senior(55 or over)	200,414.14
XXXXXXXXXXXX 8749	Credit Reserve	.00

**CHECKING ACCOUNT(S)**

CHECKSMART SENIOR(55 OR OVER)		STATEMENT DATES	7/11/19 THRU	8/11/19
ACCOUNT NUMBER	XXXXXXXXXXXX 8749			0
PREVIOUS BALANCE	200,414.14	DAYS IN THE STATEMENT PERIOD		32
DEPOSITS/CREDITS	.00	AVERAGE LEDGER BALANCE	200,414.14	
CHECKS/DEBITS	.00	AVERAGE COLLECTED BAL.	200,414.14	
OTHER FEES	.00			
INTEREST AMOUNT	.00			
PRESENT BALANCE	200,414.14			

**DAILY BALANCE SUMMARY**

DATE	BALANCE
7/11	200,414.14



## **Exhibit 11-6**

UNITED STATES OF AMERICA

VS

RAPOWER-3, LLC

GLEND A E. JOHNSON

May 01, 2019



333 South Rio Grande  
Salt Lake City, Utah 84101  
[www.DepoMaxMerit.com](http://www.DepoMaxMerit.com)

Toll Free 800-337-6629  
Phone 801-328-1188  
Fax 801-328-1189

May 01, 2019

1 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH  
2 CENTRAL DIVISION

3 UNITED STATES OF AMERICA, ) No. 2:15-cv-00828-DN  
4 )  
5 Plaintiff, ) Deposition of  
6 v. ) GLENDA E. JOHNSON

7 RAPOWER-3, LLC; INTERNATIONAL )  
8 AUTOMATED SYSTEMS, INC.; )  
9 LTBI, LLC; R. GREGORY SHEPARD; )  
10 NELDON JOHNSON; and )  
11 ROGER FREEBORN, )  
12 Defendants. )



11 \* \* \*

12 May 1, 2019

13 9:20 a.m. to 5:15 p.m.

14  
15 Parr Brown Gee & Loveless  
16 101 South 200 East, Suite 700  
17 Salt Lake City, Utah 84111

18  
19  
20 \* \* \*

21 Letitia L. Meredith  
22 Registered Professional Reporter  
23 Certified Shorthand Reporter CA  
24  
25

May 01, 2019

<p style="text-align: right; margin-right: 20px;">2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>For Court-Appointed Receiver R. Wayne Klein:                  Michael S. Lehr                  PARR BROWN GEE &amp; LOVELESS                  101 South 200 East, Suite 700                  Salt Lake City, Utah 84111</p> <p>For the Receivership:                  R. Wayne Klein                  KLEIN &amp; ASSOCIATES                  P.O. Box 1836                  Salt Lake City, Utah 84110</p> <p>For United States Department of Justice:                  (Telephonically)                  Erin Healy-Gallagher                  UNITED STATES DEPARTMENT OF JUSTICE                  TAX DIVISION                  555 4th Street NW, Suite 8921                  Washington DC 20001</p> <p>For The Deponent:                  Steven R. Paul                  NELSON SNUFFER DAHLE &amp; POULSEN                  10885 South State Street                  Sandy, Utah 84070</p> <p>Also present: Neldon Johnson</p> <p style="text-align: center;">* * * *</p> <p style="text-align: center;">I N D E X</p> <p>EXAMINATION <span style="float: right;">PAGE</span>                  By Mr. Klein <span style="float: right;">6</span></p>	<p style="text-align: right; margin-right: 20px;">4</p> <p style="text-align: center;">I N D E X (Continued)</p> <p>EXHIBITS <span style="float: right;">PAGE</span></p> <p>2021 Property Search, 608.680 acres                  Howard County, Texas <span style="float: right;">216</span></p> <p>2022 Property Search, 18.3 acres                  Howard County, Texas <span style="float: right;">216</span></p> <p>2025 Agreement, December 8, 2004 <span style="float: right;">219</span></p> <p>2029 Bank Records <span style="float: right;">164</span></p> <p>2030 Five Pages, Millard County Credit Union,                  Account Number 16804 <span style="float: right;">199</span></p> <p>647 Photocopy of Check, January 27, 2012                  IAS to N.P. Johnson Family                  Limited Partnership <span style="float: right;">218</span></p> <p>648 Photocopies of Checks,                  BANKOFAMERICANFORK-000195 <span style="float: right;">163</span></p> <p>649 Photocopy of Check, Cobblestone Centre                  to Howard County Tax Office, 08/25/15; <span style="float: right;">216</span></p> <p>650 Photocopy of Check, Cobblestone Centre                  to Randy Johnson, 12/31/14; \$30,000 <span style="float: right;">105</span></p> <p>945 Bank Documents <span style="float: right;">67</span></p>
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<p style="text-align: right; margin-right: 20px;">3</p> <p style="text-align: center;">I N D E X (Continued)</p> <p>EXHIBITS <span style="float: right;">PAGE</span></p> <p>2001 Notice of Intent to Serve Subpoena <span style="float: right;">11</span></p> <p>2002 2001 Form 1096 Annual Summary, Solco I <span style="float: right;">38</span></p> <p>2003 2001 Form 1096 Annual Summary, XSun Energy <span style="float: right;">45</span></p> <p>2004 Spreadsheet, Checks Payable to                  Randale Johnson <span style="float: right;">104</span></p> <p>2005 Spreadsheet, Checks Payable to                  LaGrand Johnson <span style="float: right;">107</span></p> <p>2006 Declaration of Glenda Johnson <span style="float: right;">109</span></p> <p>2007 Spreadsheet, Transfers from RaPower-3 to                  Cobblestone Centre 2013-2018 <span style="float: right;">114</span></p> <p>2008 Redacted Billing Pages, Nelson Snuffer <span style="float: right;">116</span></p> <p>2009 Spreadsheet, Checks Payable to                  Glenda Johnson <span style="float: right;">135</span></p> <p>2010 Spreadsheet, Withdrawal or "Cash"                  check signed by Glenda Johnson <span style="float: right;">144</span></p> <p>2014 Spreadsheet, Checks Payable,                  Various Johnsons <span style="float: right;">146</span></p> <p>2015 Withdrawal Slip, Wells Fargo,                  Account 6629, \$23,000 <span style="float: right;">152</span></p> <p>2016 Spreadsheet, Capital One and Others <span style="float: right;">154</span></p> <p>2017 Spreadsheet, Real Property:                  Owned by G. Johnson <span style="float: right;">202</span></p> <p>2018 Quitclaim Deed, August 30, 2007                  4035 South 4000 West, Deseret <span style="float: right;">204</span></p> <p>2019 Quitclaim Deed, August 30, 2007                  4035 South 4000 West, Deseret <span style="float: right;">205</span></p> <p>2020 Quitclaim Deed, April 22, 2016 <span style="float: right;">206</span></p>	<p style="text-align: right; margin-right: 20px;">5</p> <p style="text-align: center;">P R O C E E D I N G S</p> <p>MR. KLEIN: Today is the date set for the                  deposition of Glenda Johnson. My name is                  Wayne Klein. I'm the Court-appointed Receiver in                  this matter.</p> <p>And, Mike and Steven, do you want to put                  your information on the record?</p> <p>MR. LEHR: Sure. Mike Lehr, attorney for                  Court-appointed Receiver, Wayne Klein.</p> <p>MR. PAUL: Steven Paul, representing                  Glenda Johnson today.</p> <p>MR. KLEIN: Mr. Johnson?</p> <p>NELDON JOHNSON: Yes, Neldon Johnson,                  representing Neldon Johnson.</p> <p>MR. KLEIN: Ms. Healy-Gallagher?</p> <p>MS. HEALY-GALLAGHER: This is                  Erin Healy-Gallagher, representing the United States                  from the United States Department of Justice's                  Tax Division.</p> <p>GLEND E. JOHNSON,                  called as a witness on behalf of the Receivership,                  having been duly sworn, was examined and testified as                  follows:</p> <p>///</p> <p>///</p>
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May 01, 2019

50	<p>1 Q. Did you enter data into QuickBooks from 2 Cobblestone Centre financial transactions? 3 A. Yes. 4 Q. What was the business of 5 Cobblestone Centre? 6 A. To my knowledge, it was erecting the 7 towers, and that's all I can say. That's all I know. 8 Q. Okay. Let's talk about the entity 9 DCL-16A, Inc. Are you familiar with that entity? 10 A. I've heard of it. 11 Q. Do you know if it had any bank accounts? 12 A. No, it didn't have any. I need go to the 13 bathroom. 14 MR. KLEIN: We'll take a break. 15 MR. PAUL: Thank you. 16 (A break was taken.) 17 Q. Mrs. Johnson, are you familiar with the 18 entity DCL16BLT, Inc.? 19 A. I've heard of it. 20 Q. Do you know if it had any bank accounts? 21 A. No. 22 Q. No, you don't know or no, it did not? 23 A. It did not. 24 Q. Are you familiar with the entity LTB O&amp;M, 25 LLC.</p>	52	<p>1 A. Correct. 2 Q. Do you know whether the 3 Solstice Enterprises entity had any bank accounts? 4 A. Did not have any. 5 Q. Are you familiar with Black Night 6 Enterprise, Inc.? 7 A. I've heard of it. 8 Q. To your knowledge, did it have any bank 9 accounts? 10 A. No. 11 Q. Have you ever been to Nevis? 12 A. No. 13 Q. Do you know where Nevis is? 14 A. In the world? 15 Q. Yes. 16 A. Somewhere here in the world. 17 Q. Do you know where in the world it is? 18 A. I don't. 19 Q. Are you familiar -- are you aware that 20 Black Night Enterprises is incorporated in Nevis, the 21 country of Nevis? 22 A. Yes. 23 Q. Have you ever been to Nevis? 24 A. No. 25 Q. To your knowledge, has your husband ever</p>
51	<p>1 A. Yes. 2 Q. To your knowledge, did it have any bank 3 accounts? 4 A. It did not. 5 Q. Are you familiar with the N.P. Johnson 6 Family Limited Partnership? 7 A. I've heard of it. 8 Q. To your knowledge, did it have any bank 9 accounts? 10 A. It did not. 11 Q. Have you heard of the entity 12 Solstice Enterprises? 13 A. Yes. 14 Q. To your knowledge, did Solstice Enterprises 15 have any bank accounts? 16 A. It did not. 17 Q. Have you heard -- 18 MS. HEALY-GALLAGHER: Erin Healy-Gallagher. 19 Again, Mrs. Johnson, could you please speak up or 20 perhaps reorient the phone if you've changed 21 position. 22 MR. KLEIN: We'll put the phone closer to her. 23 Q. Her answer was the N.P. Johnson Family 24 Limited Partnership did not have any bank accounts. 25 Is that correct?</p>	53	<p>1 been to Nevis? 2 A. I don't know. 3 Q. To your knowledge, has LaGrand Johnson ever 4 been to Nevis? 5 A. I don't know. 6 Q. To your knowledge, has Randale Johnson ever 7 been to Nevis? 8 A. I don't know. 9 Q. The entity Starlight Holdings, to your 10 knowledge, does Starlight Holdings have any bank 11 accounts? 12 A. No. 13 Q. No, meaning you understand -- you're not 14 aware that it had any bank accounts? 15 A. That's correct. 16 Q. Have there been other companies Mr. Johnson 17 has been associated with that you've done bookkeeping 18 work for? 19 A. Say that again. 20 Q. We've talked about a number of entities 21 that you've done bookkeeping work for this morning; 22 correct? 23 A. Correct. 24 Q. Are you aware of any entities -- start 25 over.</p>



May 01, 2019

54	<p>1 <b>Are there any entities that you've provided</b></p> <p>2 <b>bookkeeping work for other than the ones we've</b></p> <p>3 <b>mentioned?</b></p> <p>4 A. To my knowledge, no.</p> <p>5 <b>Q. Did you do any bookkeeping work for a</b></p> <p>6 <b>company called U-Check?</b></p> <p>7 A. No.</p> <p>8 <b>Q. To your knowledge, did U-Check have any</b></p> <p>9 <b>bank accounts?</b></p> <p>10 A. I don't know anything about that company.</p> <p>11 <b>Q. What payments have you received from any of</b></p> <p>12 <b>these entities?</b></p> <p>13 MR. PAUL: What entities?</p> <p>14 <b>Q. Any of the entities we've discussed this</b></p> <p>15 <b>morning.</b></p> <p>16 NELDON JOHNSON: That's vague. It's kind of</p> <p>17 vague. I wouldn't know how to answer that.</p> <p>18 <b>Q. Let me start over. We asked about payments</b></p> <p>19 <b>you'd received from RaPower-3. Did you receive any</b></p> <p>20 <b>payments from IAS?</b></p> <p>21 NELDON JOHNSON: Are you --</p> <p>22 A. I'm sorry.</p> <p>23 NELDON JOHNSON: Let me make an objection.</p> <p>24 MR. KLEIN: What's your objection?</p> <p>25 NELDON JOHNSON: I would just ask are you saying</p>	56	<p>1 <b>Q. So at this point right here, you have no</b></p> <p>2 <b>recollection of receiving any money from Cobblestone?</b></p> <p>3 A. I'd have to look back on the records.</p> <p>4 <b>Q. Do you recall whether you got any money</b></p> <p>5 <b>from DCL-16A?</b></p> <p>6 A. No.</p> <p>7 <b>Q. No, you don't recall or no, you did not</b></p> <p>8 <b>receive any?</b></p> <p>9 A. I did not receive any.</p> <p>10 <b>Q. Did you receive any money from DCL16BLT?</b></p> <p>11 A. No.</p> <p>12 <b>Q. Did you receive any money from LTB O&amp;M?</b></p> <p>13 A. No.</p> <p>14 <b>Q. Did you receive any money from the</b></p> <p>15 <b>N.P. Johnson Family Limited Partnership?</b></p> <p>16 A. No.</p> <p>17 <b>Q. Did you receive any money from</b></p> <p>18 <b>Solstice Enterprises?</b></p> <p>19 A. No.</p> <p>20 <b>Q. Did you receive any money from</b></p> <p>21 <b>Black Night Enterprises?</b></p> <p>22 A. No.</p> <p>23 <b>Q. Did you receive any money from</b></p> <p>24 <b>Starlight Holdings?</b></p> <p>25 A. No.</p>
55	<p>1 as an employee did she get paid or what kind of</p> <p>2 payments -- do you want her to say, "I got paid a</p> <p>3 dollar, two dollars for a candy bar"? I don't -- if</p> <p>4 you would say, "As an employee did you get money" or</p> <p>5 I'm just not sure how she would answer that. If she</p> <p>6 got reimbursed for money or something like that.</p> <p>7 MR. KLEIN: Okay. Your objection is noted.</p> <p>8 <b>Q. (BY MR. KLEIN) Did you receive any money</b></p> <p>9 <b>from IAS?</b></p> <p>10 A. An actual check?</p> <p>11 <b>Q. Well, no. Money -- whether it was a check,</b></p> <p>12 <b>whether you went into the bank and withdrew money,</b></p> <p>13 <b>whether it was a wire transfer, whether it was a</b></p> <p>14 <b>transfer from IAS to another bank account. In any</b></p> <p>15 <b>fashion, did you get money from IAS?</b></p> <p>16 A. I'd have to look back on my bank records.</p> <p>17 <b>Q. Did you receive any money from LTB1?</b></p> <p>18 A. No.</p> <p>19 <b>Q. Any money from Solco I?</b></p> <p>20 A. I'd have to look back on the records.</p> <p>21 <b>Q. Did you receive any money from XSun?</b></p> <p>22 A. I'd have to look back on the records.</p> <p>23 <b>Q. To your knowledge, did you receive any</b></p> <p>24 <b>money from Cobblestone Centre?</b></p> <p>25 A. I'd have to look back on the records.</p>	57	<p>1 <b>Q. Have you had any roles or done any work for</b></p> <p>2 <b>Shepard Energy?</b></p> <p>3 A. No.</p> <p>4 <b>Q. Shepard Global?</b></p> <p>5 A. No.</p> <p>6 <b>Q. When did you marry Mr. Johnson?</b></p> <p>7 A. That's a good question. It's either May 14</p> <p>8 or 15. I'm sorry.</p> <p>9 <b>Q. What year?</b></p> <p>10 A. '01.</p> <p>11 <b>Q. And were you married before that?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. I believe you indicated your second</b></p> <p>14 <b>marriage ended in divorce; is that correct?</b></p> <p>15 A. Correct.</p> <p>16 <b>Q. And when did that marriage end?</b></p> <p>17 A. To my knowledge, it would have been</p> <p>18 January 2001.</p> <p>19 <b>Q. And was there a property settlement that</b></p> <p>20 <b>was finalized with that marriage or that divorce?</b></p> <p>21 A. You will have to explain what you mean</p> <p>22 "property settlement."</p> <p>23 <b>Q. Okay. At the time -- so your divorce from</b></p> <p>24 <b>your second husband was in January of 2001; is that</b></p> <p>25 <b>correct?</b></p>

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58	<p>1 A. Correct.</p> <p>2 <b>Q. And was the divorce finalized at that</b></p> <p>3 <b>point?</b></p> <p>4 A. Correct.</p> <p>5 <b>Q. Was there any property settlement that was</b></p> <p>6 <b>still pending at the time of your divorce?</b></p> <p>7 A. There was a home that had not been sold.</p> <p>8 Is that what you're asking?</p> <p>9 <b>Q. Yes.</b></p> <p>10 A. He lived in the house. He wouldn't work,</p> <p>11 and I left him. And I lived with my parents. He was</p> <p>12 living in the house. He was not paying house</p> <p>13 payments. We finally sold the house. I did not</p> <p>14 receive any money from that house because it had to</p> <p>15 pay for house payments he did not make. I did not</p> <p>16 receive any money from him.</p> <p>17 <b>Q. So in connection with the divorce, you got</b></p> <p>18 <b>no money out of the divorce; correct?</b></p> <p>19 A. I didn't get anything.</p> <p>20 <b>Q. Did you get any assets, any real estate?</b></p> <p>21 A. No, I didn't get any real estate.</p> <p>22 <b>Q. Have you gotten any payments from him since</b></p> <p>23 <b>then pursuant to the divorce?</b></p> <p>24 A. No.</p> <p>25 <b>Q. Have you received any monies or properties</b></p>	60	<p>1 A. Well, at least a year because I had to make</p> <p>2 sure that all their bills were paid and everything</p> <p>3 because I was --</p> <p>4 <b>Q. Did you administer the estate?</b></p> <p>5 A. Uh-huh.</p> <p>6 MR. PAUL: Yes?</p> <p>7 A. Yes.</p> <p>8 MR. PAUL: It's okay.</p> <p>9 <b>Q. Did you receive anything other than cash</b></p> <p>10 <b>from the estate?</b></p> <p>11 A. Mementoes and things like that. Is that</p> <p>12 what you're asking?</p> <p>13 <b>Q. That helps. I could have asked the</b></p> <p>14 <b>question better. I will try.</b></p> <p>15 <b>Did you receive any real estate that was</b></p> <p>16 <b>given to you by the will?</b></p> <p>17 A. No.</p> <p>18 <b>Q. Did you receive any vehicles?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. What vehicles?</b></p> <p>21 A. Just a sedan, an old car.</p> <p>22 <b>Q. Okay. Did they have any brokerage accounts</b></p> <p>23 <b>or investments that they gave to you?</b></p> <p>24 MR. PAUL: Other than the one hundred to one</p> <p>25 hundred fifty thousand that she received?</p>
59	<p>1 <b>by inheritance?</b></p> <p>2 A. By what?</p> <p>3 <b>Q. Inheritance?</b></p> <p>4 A. Say that again.</p> <p>5 <b>Q. By inheritance, has someone died and left</b></p> <p>6 <b>you money through a will?</b></p> <p>7 A. My parents died and what money was left</p> <p>8 over then was divided with us kids.</p> <p>9 <b>Q. And when did your parents die?</b></p> <p>10 A. My father died in '09 and my mother died in</p> <p>11 '10.</p> <p>12 <b>Q. And how much did you get as part of the</b></p> <p>13 <b>settlement from after their deaths?</b></p> <p>14 A. I know it was over a hundred thousand.</p> <p>15 <b>Q. Was it over 200,000?</b></p> <p>16 A. No.</p> <p>17 <b>Q. Was it over 150?</b></p> <p>18 A. No.</p> <p>19 <b>Q. So somewhere between a hundred and a</b></p> <p>20 <b>hundred fifty thousand dollars?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. And when did you get that?</b></p> <p>23 A. Mother died in October of '10, so it would</p> <p>24 have been after that.</p> <p>25 <b>Q. Within a year after that?</b></p>	61	<p>1 <b>Q. Correct.</b></p> <p>2 A. There was oil le- -- oil on my</p> <p>3 grandparents' property that was given to my mother,</p> <p>4 and then between all of us kids we got some. Is that</p> <p>5 what you're asking?</p> <p>6 <b>Q. Yes. So was that an ongoing payment or was</b></p> <p>7 <b>that oil lease sold and then the proceeds from that</b></p> <p>8 <b>were divided among the siblings?</b></p> <p>9 A. No, it's just an ongoing payment. Whatever</p> <p>10 comes out of ground, we get a little bit of money.</p> <p>11 <b>Q. How much do you get from that on a monthly</b></p> <p>12 <b>or annual basis?</b></p> <p>13 A. About every two months I might get a</p> <p>14 hundred dollars.</p> <p>15 <b>Q. Did you get anything else after your</b></p> <p>16 <b>parents' death other than the hundred to hundred and</b></p> <p>17 <b>fifty thousand dollars we discussed, the car, and the</b></p> <p>18 <b>ongoing oil royalties, and mementoes?</b></p> <p>19 A. That's all.</p> <p>20 <b>Q. At the time you married Mr. Johnson did you</b></p> <p>21 <b>own any real estate in your own name?</b></p> <p>22 A. I just already told you that I had that one</p> <p>23 with my ex and myself, and it was sold.</p> <p>24 <b>Q. And he still lived in it at the time you</b></p> <p>25 <b>married and it later on sold; correct?</b></p>

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62	<p>1 A. Yeah. Yes.</p> <p>2 <b>Q. Did you have any other real estate other</b></p> <p>3 <b>than that?</b></p> <p>4 A. No.</p> <p>5 <b>Q. At the time you married Mr. Johnson did you</b></p> <p>6 <b>have any bank accounts?</b></p> <p>7 A. Did I personally?</p> <p>8 <b>Q. Yes.</b></p> <p>9 A. Yes.</p> <p>10 <b>Q. Did you keep those bank accounts in your</b></p> <p>11 <b>name or did you establish joint bank accounts with</b></p> <p>12 <b>Mr. Johnson?</b></p> <p>13 A. In my name.</p> <p>14 <b>Q. So how many bank accounts did you have at</b></p> <p>15 <b>the time you married Mr. Johnson?</b></p> <p>16 A. One.</p> <p>17 <b>Q. Where was that bank account?</b></p> <p>18 A. Bank of American Fork.</p> <p>19 <b>Q. Is that still in your name?</b></p> <p>20 A. Yes.</p> <p>21 <b>Q. Is Mr. Johnson a signatory on that bank</b></p> <p>22 <b>account?</b></p> <p>23 A. No.</p> <p>24 <b>Q. Since you married Mr. Johnson, what bank</b></p> <p>25 <b>accounts have you had?</b></p>	64	<p>1 A. No.</p> <p>2 <b>Q. The Zions bank account, is that still open?</b></p> <p>3 A. No.</p> <p>4 <b>Q. Was Mr. Johnson a signatory on that bank</b></p> <p>5 <b>account?</b></p> <p>6 A. No.</p> <p>7 <b>Q. Was anyone else a signatory other than you?</b></p> <p>8 A. No.</p> <p>9 <b>Q. When you received payments from RaPower-3</b></p> <p>10 <b>in connection with the sales from your downline,</b></p> <p>11 <b>where did you deposit those funds?</b></p> <p>12 A. Could have been in any of those banks.</p> <p>13 <b>Q. So if I understanding correctly, you</b></p> <p>14 <b>currently have three bank accounts. One at</b></p> <p>15 <b>Bank of American Fork, one at Millard County Credit</b></p> <p>16 <b>Union, and one at Wells Fargo; is that correct?</b></p> <p>17 A. Correct.</p> <p>18 <b>Q. Do you have a system for which bank</b></p> <p>19 <b>accounts you use for particular purposes?</b></p> <p>20 A. No, I don't have a system. It's whatever I</p> <p>21 feel like doing.</p> <p>22 <b>Q. What sources of income have you had since</b></p> <p>23 <b>you married Mr. Johnson?</b></p> <p>24 A. I worked for my brother as I told you.</p> <p>25 <b>Q. During what period?</b></p>
63	<p>1 A. Millard County Credit Union.</p> <p>2 <b>Q. Any others?</b></p> <p>3 A. Wells Fargo.</p> <p>4 <b>Q. Any others?</b></p> <p>5 A. Zions.</p> <p>6 <b>Q. Any others?</b></p> <p>7 A. Do you have Bank of American Fork?</p> <p>8 <b>Q. The Bank of America Fork is the one in your</b></p> <p>9 <b>name. Do you have a joint account -- have you opened</b></p> <p>10 <b>an account at Bank of American Fork with Mr. Johnson</b></p> <p>11 <b>since you've been married?</b></p> <p>12 A. Me personally, no. Mr. Johnson is not on</p> <p>13 any of my bank accounts.</p> <p>14 <b>Q. So is the Millard County Credit Union Bank</b></p> <p>15 <b>account still open in your name?</b></p> <p>16 A. Yes. And he's not on it.</p> <p>17 <b>Q. Is anyone else on it other than you?</b></p> <p>18 A. No.</p> <p>19 <b>Q. The Wells Fargo Bank account in your name,</b></p> <p>20 <b>is that still open?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. Is Mr. Johnson a signatory on that account?</b></p> <p>23 A. No.</p> <p>24 <b>Q. Is anyone a signatory on that account other</b></p> <p>25 <b>than you?</b></p>	65	<p>1 A. From '01 to, I believe, '04.</p> <p>2 <b>Q. Is that the restaurant you mentioned</b></p> <p>3 <b>earlier?</b></p> <p>4 A. No, that was with the last one that I</p> <p>5 mention -- oh, yeah, let's see. What did I tell you</p> <p>6 it was called? It is the last one that I told you</p> <p>7 about.</p> <p>8 <b>Q. Okay. Okay. Other than your brother, what</b></p> <p>9 <b>other sources of income have you had since 2001?</b></p> <p>10 A. Social security.</p> <p>11 <b>Q. Any other sources of income?</b></p> <p>12 A. The oil.</p> <p>13 <b>Q. And you mentioned RaPower-3 commissions.</b></p> <p>14 <b>Any others besides these four that we've identified?</b></p> <p>15 A. And I'm still getting some from my</p> <p>16 father's -- oh, no, I told you -- I told you the oil,</p> <p>17 what I get on the oil, yeah.</p> <p>18 <b>Q. Approximately how much do you believe you</b></p> <p>19 <b>receive from RaPower-3 in commissions?</b></p> <p>20 A. It varies.</p> <p>21 <b>Q. Do you have an estimate total amount you</b></p> <p>22 <b>would have received from RaPower-3?</b></p> <p>23 A. I don't.</p> <p>24 <b>Q. Do you think it was over 10,000?</b></p> <p>25 A. I don't know.</p>

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<p style="text-align: right;">66</p> <p><b>1 Q. Do you think it was over a hundred</b></p> <p><b>2 thousand?</b></p> <p>3 A. I don't know. I would have to go back and</p> <p>4 correct.</p> <p><b>5 Q. Could it have been over 500,000?</b></p> <p>6 A. No.</p> <p><b>7 Q. Do you think it might have been over a</b></p> <p><b>8 hundred thousand?</b></p> <p>9 A. I don't know.</p> <p><b>10 Q. But it could have been?</b></p> <p>11 A. I don't know.</p> <p><b>12 Q. I'm handing you what has been previously</b></p> <p><b>13 marked as Exhibit 945.</b></p> <p>14 A. I am getting rent. I'm sorry.</p> <p><b>15 Q. Let's talk about rent. What rent are you</b></p> <p><b>16 receiving?</b></p> <p>17 A. From my house.</p> <p><b>18 Q. What house is that?</b></p> <p>19 A. The one in Deseret.</p> <p><b>20 Q. What's the address there?</b></p> <p>21 A. I believe it's 4035 South 4000 West,</p> <p>22 Deseret.</p> <p><b>23 Q. And do you have a tenant in that home?</b></p> <p>24 A. Yes, I do.</p> <p><b>25 Q. And what's the monthly amount you receive</b></p>	<p style="text-align: right;">68</p> <p><b>1 documents from this exhibit. Turn to the fourth page</b></p> <p><b>2 of this exhibit, please.</b></p> <p>3 MR. LEHR: Ms. Johnson, for clarity, the page</p> <p>4 numbers, if you look at P-L-E-X and then it says "945</p> <p>5 point," and after the point will give you the page</p> <p>6 number Mr. Klein is referring to.</p> <p>7 GLENDA JOHNSON: I have to go to the bathroom</p> <p>8 again.</p> <p>9 MR. KLEIN: Let's take another break. Off the</p> <p>10 record.</p> <p>11 (A break was taken.)</p> <p><b>12 Q. (BY MR. KLEIN) Are you ready?</b></p> <p>13 A. Yes.</p> <p><b>14 Q. On the second page of this exhibit --</b></p> <p>15 A. Second?</p> <p><b>16 Q. I'll note for the record, page two of this</b></p> <p><b>17 exhibit, which is Bates' No. WF010144, this is the</b></p> <p><b>18 Wells Fargo statement of accounts for RaPower-3.</b></p> <p><b>19 So at page four approximately four-fifths</b></p> <p><b>20 of the way down on November 21st, it says "Withdrawal</b></p> <p><b>21 Made In A Branch Store."</b></p> <p><b>22 Do you see that Mrs. Johnson,</b></p> <p><b>23 November 21st?</b></p> <p>24 A. Okay.</p> <p><b>25 Q. For \$17,200. Do you see that?</b></p>
<p style="text-align: right;">67</p> <p><b>1 in rent from that home?</b></p> <p>2 A. \$650.</p> <p><b>3 Q. Can you think of any other sources of</b></p> <p><b>4 revenue you've had since 2001 other than these five?</b></p> <p>5 MR. PAUL: And inheritance we've talked about.</p> <p><b>6 Q. And the inheritance. Correct.</b></p> <p>7 A. To the best of my ability, I believe that's</p> <p>8 all.</p> <p><b>9 Q. Okay. You have before you Exhibit 945 that</b></p> <p><b>10 was introduced at the court hearing last Friday. You</b></p> <p><b>11 were at that court hearing; correct?</b></p> <p>12 A. Yes.</p> <p>13 MR. PAUL: Are you going to mark this as an</p> <p>14 exhibit to this deposition or just refer to it?</p> <p>15 MR. KLEIN: I am going to mark it as an exhibit</p> <p>16 for this deposition. So I will give a copy to the</p> <p>17 court reporter.</p> <p>18 (Deposition Exhibit 945 was marked.)</p> <p><b>19 Q. Mrs. Johnson, have you reviewed this group</b></p> <p><b>20 of documents previously, this collection of documents</b></p> <p><b>21 was used at the hearing last Friday?</b></p> <p><b>22 Were you given a copy of those documents</b></p> <p><b>23 after that hearing?</b></p> <p>24 A. I personally was not given one of those.</p> <p><b>25 Q. Okay. So we're going discuss some of the</b></p>	<p style="text-align: right;">69</p> <p>1 A. Yes.</p> <p><b>2 Q. Do you know what that withdrawal was?</b></p> <p>3 A. No.</p> <p><b>4 Q. Turn to page 15 in this exhibit which has</b></p> <p><b>5 Bates' Number WF-003782. This is a withdrawal slip.</b></p> <p><b>6 Do you see that?</b></p> <p>7 A. Yes.</p> <p><b>8 Q. And it says withdrawal to Glenda Johnson.</b></p> <p><b>9 Is that your signature on this document?</b></p> <p>10 A. Yes.</p> <p>11 (Telephonic interruption)</p> <p>12 GLENDA JOHNSON: Sorry. I didn't turn that off.</p> <p>13 (off the record)</p> <p><b>14 Q. (BY MR. KLEIN) Back on the record. Is</b></p> <p><b>15 that your handwriting elsewhere on this document on</b></p> <p><b>16 page 15?</b></p> <p>17 A. I'm not sure if that is because, where it</p> <p>18 says Glenda Johnson up here, it could be the bank</p> <p>19 teller that did that.</p> <p><b>20 Q. Okay. The cursive handwriting at the</b></p> <p><b>21 bottom, do you recognize whether that's your</b></p> <p><b>22 handwriting?</b></p> <p>23 A. Could be.</p> <p><b>24 Q. Is that your signature?</b></p> <p>25 A. That is my signature, yes.</p>

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<p style="text-align: right;">194</p> <p>1 trust.</p> <p>2 <b>Q. And what property does the family trust</b></p> <p>3 <b>own?</b></p> <p>4 A. Pardon?</p> <p>5 <b>Q. What property does the family trust own?</b></p> <p>6 A. It owns property in Texas.</p> <p>7 <b>Q. So this is for the Texas property?</b></p> <p>8 A. Yes.</p> <p>9 <b>Q. Is that property owned by the</b></p> <p>10 <b>N.P. Johnson Family Limited Partnership?</b></p> <p>11 A. Yes.</p> <p>12 <b>Q. The next page, top left, shows a cash</b></p> <p>13 <b>withdrawal on December 10 of 2018 in the amount of</b></p> <p>14 <b>\$8,000. Do you see that?</b></p> <p>15 A. Yes.</p> <p>16 <b>Q. What did you do with that money you</b></p> <p>17 <b>withdrew?</b></p> <p>18 A. I don't know.</p> <p>19 <b>Q. Do you have any records that would help you</b></p> <p>20 <b>answer that question?</b></p> <p>21 A. I don't know what I did with it. It could</p> <p>22 not have even been -- it could just be cash that I</p> <p>23 have.</p> <p>24 <b>Q. And how much do you have in cash?</b></p> <p>25 A. I don't know.</p>	<p style="text-align: right;">196</p> <p>1 to Denver Snuffer on April 1, 2019 for \$1,952.50.</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 <b>Q. Was that for legal fees owed by you or</b></p> <p>5 <b>legal fees owed by one of the companies?</b></p> <p>6 A. Me.</p> <p>7 <b>Q. Two more pages and then we'll take a break.</b></p> <p>8 The last two pages are a summary that -- it</p> <p>9 appears that this is a summary created by you or</p> <p>10 downloaded by you from Bank of American Fork's online</p> <p>11 system. Do you recall that you created this?</p> <p>12 A. Yes.</p> <p>13 <b>Q. Okay. So this starts with the most recent</b></p> <p>14 <b>and goes to older, so let's go to the top of the</b></p> <p>15 <b>second page.</b></p> <p>16 A. Second page?</p> <p>17 <b>Q. Yes. And it shows a transfer to pay off</b></p> <p>18 <b>Texas land in the amount of \$23,000.</b></p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 <b>Q. Did you send the money to the lienholder</b></p> <p>22 <b>for the Texas property to pay off the remaining</b></p> <p>23 <b>balance of the loan?</b></p> <p>24 A. Yes.</p> <p>25 <b>Q. And who's the owner of that property?</b></p>
<p style="text-align: right;">195</p> <p>1 <b>Q. More than 20,000?</b></p> <p>2 A. Well, I have -- I don't know. I'd have to</p> <p>3 look and see.</p> <p>4 <b>Q. Will you find out the answer and have your</b></p> <p>5 <b>attorney tell me?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. The following page shows a withdrawal of</b></p> <p>8 <b>\$8,000 on January 10, 2018. Do you see that in the</b></p> <p>9 <b>amount of \$8,000?</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. Do you know what that was used for?</b></p> <p>12 A. No.</p> <p>13 <b>Q. To the right column, a withdrawal of \$9,000</b></p> <p>14 <b>on January 16, 2019. Do you know what that</b></p> <p>15 <b>withdrawal was for?</b></p> <p>16 A. No.</p> <p>17 <b>Q. Next page shows a withdrawal \$9,000 on</b></p> <p>18 <b>January 13 of 2019. Do you know what that \$9,000 was</b></p> <p>19 <b>used for?</b></p> <p>20 A. No, I don't.</p> <p>21 <b>Q. Next page shows a withdrawal of \$9,500 on</b></p> <p>22 <b>March 18, 2019. Do you know what that money was used</b></p> <p>23 <b>for?</b></p> <p>24 A. No.</p> <p>25 <b>Q. Next page top left on Check Number 572 is</b></p>	<p style="text-align: right;">197</p> <p>1 A. I don't know.</p> <p>2 <b>Q. I believe you said that it was the</b></p> <p>3 <b>N.P. Johnson Family Limited Partnership?</b></p> <p>4 A. Right.</p> <p>5 <b>Q. So why did you pay the property taxes for</b></p> <p>6 <b>property owned by the family partnership?</b></p> <p>7 A. I don't know.</p> <p>8 <b>Q. Okay. Going back to the first page,</b></p> <p>9 <b>seventh from the bottom is a transaction dated</b></p> <p>10 <b>"March" 6, 2018 in the amount of -- it's a deposit</b></p> <p>11 <b>into the account of \$120,000. Do you see that?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. We talked earlier about that payment to</b></p> <p>14 <b>you.</b></p> <p>15 A. Okay.</p> <p>16 <b>Q. So is that money that was transferred into</b></p> <p>17 <b>your Bank of American Fork account from IAS; correct?</b></p> <p>18 A. Correct.</p> <p>19 <b>Q. And above that is the 1,945,500 that we</b></p> <p>20 <b>talked about; correct?</b></p> <p>21 A. Correct.</p> <p>22 <b>Q. Two lines above that says, "Transfer to</b></p> <p>23 <b>Glenda Abraham House Stucco." Do you see that?</b></p> <p>24 A. Right.</p> <p>25 <b>Q. Is that \$30,000?</b></p>



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<p style="text-align: right;">198</p> <p>1 A. Right.</p> <p>2 <b>Q. So which house was that on?</b></p> <p>3 A. The Abraham house, and that was my personal</p> <p>4 money.</p> <p>5 <b>Q. Okay. When you say your personal money --</b></p> <p>6 A. This is the savings account; right?</p> <p>7 <b>Q. Okay.</b></p> <p>8 A. This is a savings account. I transferred</p> <p>9 that 30,000 over so I could pay for it. You saw all</p> <p>10 of that stuff.</p> <p>11 <b>Q. But this is ten days after you put in</b></p> <p>12 <b>\$2 million from IAS and Cobblestone; correct?</b></p> <p>13 A. Okay. What you're seeing is all of this --</p> <p>14 I don't know. I'm totally confused.</p> <p>15 <b>Q. Three lines above that we have August 3,</b></p> <p>16 <b>2018. It says -- move up one more. August 30, 2018</b></p> <p>17 <b>we have a transfer to "Glenda family," and it's in</b></p> <p>18 <b>the amount of \$200,000. Do you see that?</b></p> <p>19 A. Where?</p> <p>20 <b>Q. August 30, 2018.</b></p> <p>21 A. Okay.</p> <p>22 <b>Q. Where did that \$200,000 get transferred?</b></p> <p>23 A. I don't know.</p> <p>24 <b>Q. Moving up to November 2, 2018, we have a</b></p> <p>25 <b>transfer to Glenda for \$25,000. Do you believe that</b></p>	<p style="text-align: right;">200</p> <p>1 <b>Q. (BY MR. KLEIN) Mrs. Johnson, you've been</b></p> <p>2 <b>handed what's been marked as Exhibit 2030. These are</b></p> <p>3 <b>a collection of five different pages that came from</b></p> <p>4 <b>the documents were produced on the flash drive on</b></p> <p>5 <b>Monday.</b></p> <p>6 <b>On the first page, which is an account</b></p> <p>7 <b>statement from, I believe, Bank of American Fork</b></p> <p>8 <b>Account 6804 --</b></p> <p>9 A. You're wrong.</p> <p>10 <b>Q. Tell me what it is.</b></p> <p>11 A. This one --</p> <p>12 <b>Q. I'm sorry.</b></p> <p>13 A. Millard County Credit Union.</p> <p>14 <b>Q. Thank you. So the first entry under the</b></p> <p>15 <b>checking account shows 5/18/17, AM Income Life.</b></p> <p>16 <b>Do you see that?</b></p> <p>17 A. AM Income Life, yes.</p> <p>18 <b>Q. Is that a life insurance premium?</b></p> <p>19 A. Yes, for me.</p> <p>20 <b>Q. Who's the beneficiary on that policy?</b></p> <p>21 A. I don't know.</p> <p>22 <b>Q. If you die, who gets the money?</b></p> <p>23 A. Could be my kids. I don't know. I'd have</p> <p>24 to look. It's been a long, long, long, long time.</p> <p>25 <b>Q. Do you think Neldon Johnson is the</b></p>
<p style="text-align: right;">199</p> <p>1 <b>was probably -- will we see that as a deposit into</b></p> <p>2 <b>one of the other accounts?</b></p> <p>3 A. What does that say? Where are you?</p> <p>4 <b>Q. November 2, 2018.</b></p> <p>5 A. It says, "Transfer to Glenda." Is that</p> <p>6 what you're look at? "Property taxes"?</p> <p>7 <b>Q. Yes. Would I expect to find that in one of</b></p> <p>8 <b>the other bank accounts?</b></p> <p>9 A. I'm assuming.</p> <p>10 <b>Q. Let's go to the very top or the next to the</b></p> <p>11 <b>top entry, March 22, 2019, says "Transfer to folks,"</b></p> <p>12 <b>\$200,000. Who is "folks"?</b></p> <p>13 A. My parents' account, and I'm a signer on</p> <p>14 it.</p> <p>15 <b>Q. So you moved \$200,000 into your parents'</b></p> <p>16 <b>account from this account?</b></p> <p>17 A. Correct.</p> <p>18 <b>Q. Is it accurate that there would not have</b></p> <p>19 <b>been enough money to make that \$200,000 transfer to</b></p> <p>20 <b>your parents' account without the million 945 you</b></p> <p>21 <b>brought in from Cobblestone and the 120,000 from IAS?</b></p> <p>22 A. Could have been. I don't know.</p> <p>23 MR. KLEIN: Let's take a break.</p> <p>24 (A break was taken.)</p> <p>25 (Deposition Exhibit 2030 was marked.)</p>	<p style="text-align: right;">201</p> <p>1 <b>beneficiary?</b></p> <p>2 A. I don't know.</p> <p>3 <b>Q. On the next page, the second check is to</b></p> <p>4 <b>Baker Hamden, LLC. What is the reason for payments</b></p> <p>5 <b>to Baker Hamden?</b></p> <p>6 A. I don't know.</p> <p>7 <b>Q. Third page shows a number of payments to</b></p> <p>8 <b>Intuit for payroll and QuickBooks. Do you see those?</b></p> <p>9 <b>There are four of them.</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. Again, that's as of September 2018?</b></p> <p>12 A. Correct.</p> <p>13 <b>Q. Is that an online service you're using or</b></p> <p>14 <b>is that for -- what are the purposes of those</b></p> <p>15 <b>payments?</b></p> <p>16 A. That was for payroll.</p> <p>17 <b>Q. And is that being calculated on a computer?</b></p> <p>18 A. No, not that I know of.</p> <p>19 <b>Q. So do you just call in the information into</b></p> <p>20 <b>Intuit to then they --</b></p> <p>21 A. All right. Continue on. I'm sorry.</p> <p>22 <b>Q. Do you call in the information to Intuit</b></p> <p>23 <b>and they issue the paychecks?</b></p> <p>24 A. No.</p> <p>25 <b>Q. What is the purpose of the payments to</b></p>

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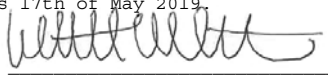
<p style="text-align: right;">202</p> <p><b>1 Intuit payroll?</b></p> <p>2 A. I have a lady that, Kelly, that I give her</p> <p>3 the information of the employees and their hours, and</p> <p>4 she takes care of it.</p> <p><b>5 Q. So what's the reason for payments to Intuit</b></p> <p><b>6 payroll?</b></p> <p>7 A. They're the ones that would do the payroll</p> <p>8 to the employees, and it would go in direct deposit.</p> <p><b>9 Q. So is that information called into them?</b></p> <p>10 A. I don't know how Kelly does it.</p> <p><b>11 Q. The next page, the fifth entry down, says</b></p> <p><b>12 Young-County COR?</b></p> <p>13 A. That's her name. Kelly County is her name.</p> <p>14 So I guess it's -- anyway, it's her company that does</p> <p>15 the payroll. Is that it?</p> <p><b>16 Q. That's all on that exhibit.</b></p> <p><b>17 Let's mark this as Exhibit 2017.</b></p> <p>18 (Deposition Exhibit 2017 was marked.)</p> <p><b>19 Q. Mrs. Johnson, you've been handed what's</b></p> <p><b>20 been marked as Exhibit 2017, which is a spreadsheet I</b></p> <p><b>21 created with information about real estate that I've</b></p> <p><b>22 identified that's titled in your name.</b></p> <p>23 A. Okay.</p> <p><b>24 Q. Does that list seem accurate to you?</b></p> <p>25 A. I wouldn't know.</p>	<p style="text-align: right;">204</p> <p><b>1 Q. And did Neldon Johnson transfer that</b></p> <p><b>2 property to you on August 30, 2007?</b></p> <p>3 A. I'm assuming. That's what it says here.</p> <p><b>4 Q. Does that sound right to you?</b></p> <p>5 A. I don't know. I'm just assuming. You've</p> <p>6 got it here, so I'm assuming.</p> <p>7 MR. KLEIN: Let's mark this as 2018.</p> <p>8 (Deposition Exhibit 2018 was marked.)</p> <p><b>9 Q. You've been handed what's been marked as</b></p> <p><b>10 Exhibit 2018, which shows a Quitclaim Deed, dated</b></p> <p><b>11 August 30, 2007.</b></p> <p>12 A. Okay.</p> <p><b>13 Q. At the top it says "When recorded mail to</b></p> <p><b>14 Glenda Johnson." Do you recognize whose handwriting</b></p> <p><b>15 that is?</b></p> <p>16 A. That's mine.</p> <p><b>17 Q. And the handwriting under the "Quitclaim</b></p> <p><b>18 Deed," do you know whose handwriting that is?</b></p> <p>19 A. That's mine.</p> <p><b>20 Q. So is all of the handwriting above the date</b></p> <p><b>21 yours?</b></p> <p>22 A. Yes.</p> <p><b>23 Q. And is the handwriting on the date yours?</b></p> <p>24 A. Yes.</p> <p><b>25 Q. So by this, was Neldon Johnson transferring</b></p>
<p style="text-align: right;">203</p> <p><b>1 Q. Do you believe you are the owner of these</b></p> <p><b>2 properties?</b></p> <p>3 A. You mean these addresses here? I'm sorry.</p> <p>4 I don't quite understand what you're trying to ask</p> <p>5 me.</p> <p><b>6 Q. Well, according to the county records,</b></p> <p><b>7 these 18 properties are listed in your name. The</b></p> <p><b>8 ones that have addresses are the ones that generally</b></p> <p><b>9 have structures, and, therefore, they have addresses.</b></p> <p><b>10 If they don't have structures, I think generally the</b></p> <p><b>11 county does not assign an address.</b></p> <p>12 A. Okay.</p> <p><b>13 Q. We'll go through them. The second column</b></p> <p><b>14 has a paragraph symbol and certain letters down</b></p> <p><b>15 there. If you look at the one under "k," that's the</b></p> <p><b>16 Sherwood Drive property in Delta.</b></p> <p>17 A. Okay.</p> <p><b>18 Q. We've already talked about that.</b></p> <p>19 A. Okay.</p> <p><b>20 Q. So let's look at property listed as "d,"</b></p> <p><b>21 which is 10 acres, 10.04 acres, which has a parcel</b></p> <p><b>22 number of DO-3151?</b></p> <p>23 A. Okay.</p> <p><b>24 Q. Do you know you what property that is?</b></p> <p>25 A. Yeah, it's just raw property.</p>	<p style="text-align: right;">205</p> <p><b>1 ownership of this property from him to you?</b></p> <p>2 A. Yes.</p> <p><b>3 Q. And how much did you pay him for this</b></p> <p><b>4 property?</b></p> <p>5 A. You really want to know?</p> <p><b>6 Q. Yes.</b></p> <p>7 A. Probably sex.</p> <p><b>8 Q. Okay. How often?</b></p> <p>9 A. Being a wife.</p> <p><b>10 Q. I'll withdraw that.</b></p> <p>11 MR. PAUL: It's getting late. You can tell.</p> <p><b>12 Q. Did you give -- pay any money to</b></p> <p><b>13 Mr. Johnson in exchange for this transfer of</b></p> <p><b>14 property?</b></p> <p>15 A. No.</p> <p>16 MR. PAUL: Object to the extent it calls for a</p> <p>17 legal conclusion.</p> <p><b>18 Q. Let's now look on the property that is</b></p> <p><b>19 listed at "n." We'll mark this as Exhibit 2019.</b></p> <p>20 (Deposition Exhibit 2019 was marked.)</p> <p><b>21 Q. Property listed as "n" is .82 acres that</b></p> <p><b>22 does have an address of 4035 South 4000 West in</b></p> <p><b>23 Delta. Do you know what property that's referring</b></p> <p><b>24 to?</b></p> <p>25 A. Yes, that's a home in Deseret, Utah.</p>

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<p style="text-align: right;">206</p> <p><b>1 Q. The Quitclaim Deed that is Exhibit 2019, is</b></p> <p><b>2 that your handwriting on the top part of the</b></p> <p><b>3 Quitclaim Deed?</b></p> <p>4 A. Yes.</p> <p><b>5 Q. And this property was transferred -- this</b></p> <p><b>6 Quitclaim Deed was signed on August 30, 2007;</b></p> <p><b>7 correct?</b></p> <p>8 A. Correct.</p> <p><b>9 Q. Did you give any money or financial</b></p> <p><b>10 consideration, money or monetary amounts or assets to</b></p> <p><b>11 Mr. Johnson in exchange for him transferring this</b></p> <p><b>12 deed to you?</b></p> <p>13 MR. PAUL: Object to the extent it calls for a</p> <p>14 legal conclusion.</p> <p>15 A. Pardon?</p> <p><b>16 Q. Did you give any money --</b></p> <p>17 A. No.</p> <p><b>18 Q. -- or financial asset --</b></p> <p>19 A. No.</p> <p><b>20 Q. Accounts or assets?</b></p> <p>21 A. My name was already on that.</p> <p>22 MR. PAUL: Object to the extent it calls for a</p> <p>23 legal conclusion.</p> <p>24 MR. KLEIN: Mark this as 2020.</p> <p>25 (Deposition Exhibit 2020 was marked.)</p>	<p style="text-align: right;">208</p> <p><b>1 being in his name, he had to give a quitclaim deed</b></p> <p><b>2 for his interest in the property to you?</b></p> <p>3 MR. PAUL: Object to the extent it calls for a</p> <p>4 legal conclusion.</p> <p><b>5 Q. Tell me what you meant by what you said.</b></p> <p>6 A. Okay. Because I told them I was going to</p> <p>7 have it in my name only, they said, "Are you</p> <p>8 married?" I said yes, and they said, "Well, you have</p> <p>9 to have your husband sign a quitclaim deed."</p> <p><b>10 Q. Okay.</b></p> <p>11 A. "Because you don't want it in his name,</p> <p>12 both of your names." That's all I'm telling you.</p> <p><b>13 Q. Why did you insist the property was going</b></p> <p><b>14 to be in your name only?</b></p> <p>15 A. Ask Mr. Johnson why he wanted it.</p> <p><b>16 Q. I think you just said you told them you</b></p> <p><b>17 wanted the property in your name only; correct?</b></p> <p>18 A. Right, because he told me to put it in my</p> <p>19 name.</p> <p><b>20 Q. Did you give any money or financial</b></p> <p><b>21 transfers or assets to him in exchange for him giving</b></p> <p><b>22 you his interest in this property?</b></p> <p>23 MR. PAUL: Objection to the extent it calls for</p> <p>24 a legal conclusion.</p> <p>25 A. No.</p>
<p style="text-align: right;">207</p> <p><b>1 Q. Reporter has handed you what has been</b></p> <p><b>2 marked as Exhibit 2020. This is a Quitclaim Deed</b></p> <p><b>3 dated April 22, 2016. Do you know what property this</b></p> <p><b>4 relates to?</b></p> <p>5 A. Well, if you look down here it says City of</p> <p>6 Santa Clarita.</p> <p><b>7 Q. Yes. And just above his signature,</b></p> <p><b>8 Neldon Johnson's signature, and above the date is</b></p> <p><b>9 also the address. Do you see that?</b></p> <p>10 A. Oh, okay.</p> <p><b>11 Q. 18850 Vista Del Cannon, Number G in</b></p> <p><b>12 Newhall, California?</b></p> <p>13 A. Right. Yes. Do you know how California</p> <p>14 works?</p> <p>15 MR. PAUL: Wait for a question.</p> <p><b>16 Q. Tell me your understanding.</b></p> <p>17 A. Because I'm married and he wasn't going to</p> <p>18 be part of it, he had to do this.</p> <p><b>19 Q. He wasn't going to be part of what?</b></p> <p>20 A. He didn't want it in his name.</p> <p><b>21 Q. Okay.</b></p> <p>22 A. Do you understand that? That's California</p> <p>23 law.</p> <p><b>24 Q. Is that because California is a community</b></p> <p><b>25 property state and in order to avoid it automatically</b></p>	<p style="text-align: right;">209</p> <p><b>1 Q. Looking at Exhibit 2017, I now want to</b></p> <p><b>2 discuss the other properties. We'll do it in the</b></p> <p><b>3 sequence in which they were purchased.</b></p> <p><b>4 So the first one is property "v," which is</b></p> <p><b>5 4.6 acres, was purchased February 14, 2011 from</b></p> <p><b>6 M. Moreno Robins Properties. Do you see that?</b></p> <p>7 A. Yes.</p> <p><b>8 Q. What was the purchase price for this</b></p> <p><b>9 property?</b></p> <p>10 A. I don't know.</p> <p><b>11 Q. The assessed value is \$896.</b></p> <p><b>12 Do you see that?</b></p> <p>13 A. Okay.</p> <p><b>14 Q. What was the source of funds you used to</b></p> <p><b>15 purchase this property?</b></p> <p>16 A. My own.</p> <p><b>17 Q. And was that money you had gotten from your</b></p> <p><b>18 inheritance?</b></p> <p>19 A. I don't know. That was a long time ago.</p> <p>20 That was clear back in -- looks like '11.</p> <p><b>21 Q. Are there any buildings or structures on</b></p> <p><b>22 that property?</b></p> <p>23 A. No.</p> <p><b>24 Q. Okay. Let's look at property "l."</b></p> <p>25 A. "L"?</p>



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<p style="text-align: right;">222</p> <p>1 Q. Yes.</p> <p>2 A. I don't know.</p> <p>3 Q. Do you own any solar lenses?</p> <p>4 A. A few.</p> <p>5 Q. How many?</p> <p>6 A. I don't know.</p> <p>7 Q. Did you purchase them?</p> <p>8 A. I don't know how it was done.</p> <p>9 Q. Are any of the lenses that you purchased</p> <p>10 installed?</p> <p>11 A. I don't know.</p> <p>12 Q. Have you received any revenue from the use</p> <p>13 of your lenses?</p> <p>14 A. I don't know.</p> <p>15 Q. Do you own any structures other than what</p> <p>16 we've talked about?</p> <p>17 A. I don't know.</p> <p>18 Q. Do you own any equipment other than what</p> <p>19 you've identified?</p> <p>20 A. I don't know.</p> <p>21 Q. Do you own any real estate other than what</p> <p>22 we've identified?</p> <p>23 A. I don't think so. I'm going to say I don't</p> <p>24 know.</p> <p>25 Q. In Mr. Johnson's bankruptcy petition in</p>	<p style="text-align: right;">224</p> <p>1 questions.</p> <p>2 NELDON JOHNSON: No thank you.</p> <p>3 MR. KLEIN: Then we are concluded, and I thank</p> <p>4 you for your perseverance.</p> <p>5 (Whereupon the taking of this deposition was</p> <p>6 concluded at 5:15 p.m.)</p> <p>7 * * *</p> <p>8 The reading copy was submitted to the witness</p> <p>9 at spaul@nsdplaw.com; denversnuffer@gmail.com.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">223</p> <p>1 2011 he listed ownership of a time-share interest</p> <p>2 from Worldmark by Wyndham. Are you familiar with</p> <p>3 that?</p> <p>4 A. Yes.</p> <p>5 Q. What's the current status of that</p> <p>6 time-share?</p> <p>7 A. I don't know what you're talking about.</p> <p>8 Q. Is that time-share still in use? Who owns</p> <p>9 that time-share?</p> <p>10 A. Neldon and I.</p> <p>11 Q. Are the payments current on that</p> <p>12 time-share?</p> <p>13 A. Yes.</p> <p>14 MR. KLEIN: Let me take a quick break and see if</p> <p>15 I have any more questions.</p> <p>16 (A break was taken.)</p> <p>17 MR. KLEIN: Back on the record. Those are all</p> <p>18 the questions I have.</p> <p>19 Ms. Healy-Gallagher, do you have any</p> <p>20 questions?</p> <p>21 MS. HEALY-GALLAGHER: Not at this time.</p> <p>22 MR. KLEIN: Mr. Paul, did you want to ask any</p> <p>23 questions?</p> <p>24 MR. PAUL: No.</p> <p>25 MR. KLEIN: Mr. Johnson, did you want to ask any</p>	<p style="text-align: right;">225</p> <p>1 C E R T I F I C A T E</p> <p>2 STATE OF UTAH )</p> <p>3 )</p> <p>4 COUNTY OF UTAH )</p> <p>5 THIS IS TO CERTIFY that the foregoing</p> <p>6 deposition was taken before me, Letitia L. Meredith,</p> <p>7 Registered Professional Reporter and Notary Public</p> <p>8 for the State of Utah and Certified Shorthand</p> <p>9 Reporter for the State of California.</p> <p>10 That the said witness was by me, before</p> <p>11 examination, duly sworn to testify the truth, the</p> <p>12 whole truth, and nothing but the truth in said cause.</p> <p>13 That the testimony was reported by me in</p> <p>14 Stenotype, and thereafter transcribed by computer</p> <p>15 under my supervision, and that a full, true, and</p> <p>16 correct transcription is set forth in the foregoing</p> <p>17 pages.</p> <p>18 I further certify that I am not of kin or</p> <p>19 otherwise associated with any of the parties to</p> <p>20 said cause of action and that I am not interested in</p> <p>21 the event thereof.</p> <p>22 WITNESS MY HAND and official seal at</p> <p>23 Spanish Fork, Utah, this 17th of May 2019.</p> <p>24 </p> <p>25 Letitia L. Meredith, CSR, RPR</p>