EXHIBIT A

UNITED STATES OF AMERICA

VS

RAPOWER-3, LLC

GLENDA E. JOHNSON

May 01, 2019



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UNITED STATES OF AMERICA vs RAPOWER-3, LLC

May 01, 2019 Glenda E. Johnson 1 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH CENTRAL DIVISION 2 3 UNITED STATES OF AMERICA, No. 2:15-cv-00828-DN 4 Deposition of Plaintiff, 5 GLENDA E. JOHNSON v. 6 RAPOWER-3, LLC; INTERNATIONAL **COPY** 7 AUTOMATED SYSTEMS, INC.; LTB1, LLC; R. GREGORY SHEPARD;) 8 NELDON JOHNSON; and ROGER FREEBORN, 9 Defendants. 10 11 12 May 1, 2019 13 9:20 a.m. to 5:15 p.m. 14 15 Parr Brown Gee & Loveless 101 South 200 East, Suite 700 Salt Lake City, Utah 84111 16 17 18 19 20 Letitia L. Meredith 21 Registered Professional Reporter Certified Shorthand Reporter CA 22 23 24 25

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1 Q. Does that include bank statements for 2 Cobblestone?

3 A. Yes.

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Q. Are you aware that on June 29, 2018 a bankruptcy petition was filed for RaPower?

A. Yes.

Q. Was that filed by the law firm

8 Snell & Wilmer?

A. What date did you say?

10 Q. June 29 of 2018?

11 A. Yes.

12 Q. Do you know why bankruptcy petition was

13 filed?

A. No.

15 Q. Did you have any role in preparing that 16 filing?

17 A. I gave information.

Q. And who did you give the information to?

A. The attorneys.

20 Q. The attorney at Nelson Snuffer or

Snell & Wilmer? 21

22 A. Both.

23 Q. And who did you talk to at Snell & Wilmer?

A. I don't know. I can't remember the

25 gentleman's name. 120

which is on page 54, says, "As a precondition to its 2 representation of the Debtor in the Bankruptcy Case,

and in addition to the small remaining balance of the

Consulting Retainer, S&W requested a retainer in the

5 amount of \$100,000, the 'Retainer,' to support the

6 filing of the bankruptcy case."

Do you see that?

A. Yes.

Q. Does that jog your memory about whether or not the law firm required some money before they would prepare the bankruptcy petition?

A. I don't know.

13 Q. Turn to the following page, and

14 paragraph 21 and 22 says, "Subsequently, after a

15 review by S&W of the Debtor's bank records and other

related documents, S&W learned that, although the

17 Retainer funds were indeed provided by Glenda Johnson 18 to support the filing and prosecution of the Debtor's

19 Bankruptcy Case, the Retainer funds were never

20 actually contributed to the Debtor or deposited

pre-petition into a Debtor bank account."

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Paragraph 22 says, "To the best of S&W's 23 knowledge, there's no documentation evidencing or 24

memorializing a capital contribution that was made by

Glenda Johnson to the Debtor."

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Q. Would it be David Leta?

A. It would have been somebody else -- well, it could have been David Leta, but there was also somebody that he had work on the --

Q. Do you know if the law firm Snell & Wilmer required a retainer before they would prepare the bankruptcy filing?

A. I don't know.

Q. Did you provide funding for that filing?

A. I don't know. You'd have to talk to my 10 11 attorneys.

12 Q. Okay. Let's go back to Exhibit 945, this thick one we were talking about earlier. Turn to 13 14 page 54.

15 MR. PAUL: Be almost at the back. It's clearly 16 marked.

17 A. Where?

18 MR. PAUL: Bottom right-hand corner, 69, so you're about 15 pages more. 19

A. 56. What page was it?

Q. 54. Paragraph 16 -- sorry. Let me identify. This is an excerpt from the

23 Fee Application of Snell & Wilmer, which is filed 24 September 5, 2018 in Case No. 2:18-cv-00608.

And paragraph 16 in that Fee Application,

1 Did I read that correctly?

A. Yes.

Q. This says then that the retainer funds were provided by Glenda Johnson. Do you have any recollection of how -- of whether that's accurate, you provided retainer funds that were used by Snell & Wilmer to prepare the bankruptcy petition?

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A. You're being very vague. I don't understand what you're saying.

Q. In this filing, this law firm is saying 10 11 that the money that -- the \$100,000 that they 12 required before they would prepare the bankruptcy 13 petition came from you.

Do you have any knowledge of providing funds that were used to prepare the bankruptcy petition?

A. Say it again.

18 Q. Did you provide any money to Nelson Snuffer or to Snell & Wilmer law firm to be used for the 19 20 attorneys to prepare a bankruptcy petition for 21 RaPower?

22 A. All I know is that -- I don't know. I'm

23 getting really confused, and you change everything in

24 what you're saying to me, so I'm getting really

confused in what you're saying. Is that I know there 25

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1 were retainers.

- 2 Q. Okay. And did you know that Snell & Wilmer required a retainer? 3
 - A. No, I didn't know that.
- 5 Q. Are you aware that Snell & Wilmer filed
- the -- prepared the bankruptcy petition for RaPower? 6
- A. Yes. 7

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- Q. Are you aware that Snell & Wilmer required 8 9
- 10 A. I don't know what they required. I wasn't 11 part of it.
- 12 Q. Are you aware that Snell & Wilmer said that the retainer that they did get came from you? 13
- A. They're saying a retainer came from me? 14
- 15 Q. That's what this filing says.
- 16 MR. PAUL: He's asking if you knew that, so if
- you didn't know that, the answer is you didn't know 17
- 18
- 19 No. I didn't know that.
- 20 Q. And Snell & Wilmer says that the retainer
- was paid from you to Nelson Snuffer and provided from 21 22 Nelson Snuffer to Snell & Wilmer.
- 23 Did you provide any -- give any money to
- Nelson Snuffer that you knew was going to be used to 24
- 25 prepare the bankruptcy filing?

- 122 124
 - 1 A. I don't control anything with any of the
 - 2 companies or any of the checking accounts. I do not
 - 3 control anything. Mr. Johnson has the --
 - 4 Neldon Johnson has the control.
 - 5 Q. So if the money had come from you, it would 6 had to have come from your personal bank account? Is
 - 7 that what you're saying? That's the only account you
 - 8 would control?
 - MR. PAUL: Objection. Misstates her testimony.
 - 10 Q. Let me start over. During this time
 - period, at the end of June of 2018, did you control 11
 - 12 any bank accounts other than your personal bank
 - 13 accounts?
 - 14 A. That's the only account I had was my
 - 15 personal accounts.
 - 16 Q. After June 22nd of 2018, have you paid any
 - 17 money to Nelson Snuffer out of your personal bank
 - accounts? 18
 - 19 A. No.
 - 20 Q. After June 22, 2018 have you paid any money
 - to Nelson Snuffer out of the Cobblestone bank
 - 22 account?

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- 23 A. I don't know.
- 24 Q. Have you paid any -- after June 22, 2018,
 - have you paid any amounts to any other law firms out

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- A. You're still confusing me when you say me 1 2 personally.
- 3 Q. You personally?
- 4 A. No.
- 5 Q. So you did not know that you were providing
- money to Nelson Snuffer that was to be used to 6 7 prepare the bankruptcy petition?
- MR. PAUL: Objection. Misstates the documents. 8
- 9 Misstates her testimony. I believe your earlier
- guestion was whether she knew that Snell & Wilmer had
- 11 represented that, because that's what the document
- says. The document says Snell & Wilmer understood, 12
- if you read paragraph 19. 13
- 14 Q. Ms. Johnson, did you give any money to
- 15 Nelson Snuffer intending that that money be used to help prepare the bankruptcy petition for RaPower? 16
- 17 A. You're asking me if I personally wrote a
- 18 check out from my own personal account? Is that what
- 19 you're asking me?

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- Q. Yes, that is what I'm asking.
- A. I did not write any check out personally
- 22 from my own personal checking account.
- Q. Did you write a check to Nelson Snuffer out 23 24
- 25 filing of a bankruptcy for RaPower?
- of any account that you controlled to pay for the

- of the Cobblestone bank account other than 1
 - 2 **Nelson Snuffer?**
 - 3 A. I don't know.
 - 4 Q. After June 22, 2018, have you paid money
 - 5 out of your personal bank accounts to any law firms?
 - A. Yes.
 - Q. Which payments do you recall?
 - A. Well, I have to pay money for my attorney
 - 9 to be sitting here in front of you.
 - 10 Q. So you've made payments to Nelson Snuffer? 11
 - Is that what you're saying?
 - 12
 - 13 Q. Have you made payments to any law firms
 - other than Nelson Snuffer since June 22 of 2018? 14
 - A. No.
 - 16 Q. Okay. Turn to page 21 in this batch. This
 - 17 has Bates' Stamp WF001043.
 - A. Okav.
 - 19 Q. This is a check dated August 4, 2014 on
 - 20 Cobblestone Centre bank account, Check No. 3038 in
 - the amount of \$1,000 to First American Title. Is 21
 - 22 that correct?
 - A. Yes.
 - 24 MR. PAUL: Is your question is that what it
 - 25 shows?

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1 1 Q. Is that what it shows?

- 2 A. Yes.
- 3 Q. Is that your signature on this check?
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- 5 Q. Can you tell me why this check was written
- 6 to First American Title company?
- 7 A. It says on the check.
- 8 Q. And what does it say?
- 9 A. "Earnest money for property."
- 10 Q. Is that property on Sherwood Drive?
- 11 A. Yes.
- 12 Q. And is that property in Delta?
- A. Yes. 13
- Q. Why was Cobblestone Centre paying a 14
- 15 thousand dollars to purchase a property? 16
 - A. You'll have to ask Solstice company.
- Q. And who would I ask at Solstice? 17
- 18 A. Neldon Johnson.
- 19 Q. Why would Solstice company know why
- 20 Cobblestone Centre was writing a check?
- A. You'll have to ask Neldon Johnson. 21
- 22 Q. Why do you say that I should ask Solstice 23 company about a Cobblestone Centre check?
- A. Because RaPower has a contract between 24
- 25 Solstice -- between them and Solstice.

purpose was.

- A. That's what it looks like it says.
- 3 Q. What's you're independent memory of it? Do

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- you remember buying the home?
- A. Yes.
- Q. Do you remember if the earnest money was
- 7 paid from the Cobblestone account?
 - A. It looks like it was.
 - Q. Is that your memory of it?
- 10 A. I am looking at a check, and apparently
- 11 that is correct.
- 12 Q. Okay. Aside from the check, do you
- remember where the earnest money came from to 13
- 14 purchase that home?
 - A. Sir, you're really confusing me.
 - Q. Who lives in that home on Sherwood Drive?
- 17 A. Sometimes we stay there or other family can
- 18 stay there or --
- 19 Q. So is there a full-time tenant in the home? 20 Is it rented out?
- 21 A. No.
- 22 Q. And so it's a home that is available that
- 23 vou sometimes use?
- 24 A. Yes.
- 25 Q. And sometimes family?

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- Q. Okay. And what does that have to do with 1 Cobblestone writing a check to First American Title? 2
- 3 A. Well, any money that comes from RaPower
- 4 that went to Cobblestone would have been under
- Solstice's -- I don't even know how to say this. You 5
- have documents about RaPower and Solstice and how 6
- 7 everything works.
- 8 Q. I'm not following how that answers my question. How does -- help me understand why
- Solstice has anything to do with a check written by
- 11 Cobblestone.
- 12 A. I don't know.
- Q. Are you familiar with the property on 13
- Sherwood Drive in Delta? 14
- A. Yes. 15
- Q. What can you tell me about that property? 16
- 17 A. It's a house -- well, it's a modular home.
- 18 Q. Who owns that property?
- 19 A. I do.
- 20 Q. So did Cobblestone Centre pay earnest money
- as a deposit on the home that was going to be
- 22 purchased in your name?
- 23 A. That's what it says.
- 24 Q. That's what it seems to imply, and I'm
- 25 trying to find out from you if that's what its

- A. Yes. Sometimes business people can use it. 1 2 Employees can use it.
 - Q. Employees of who? Which company?
- 3 4 A. Well, there were people from RaPower, and 5 anybody that wanted to come and look at any of the 6 lenses, if they needed a place to stay, instead of 7 going to a hotel, they could stay there.
 - Q. Do you remember what the total purchase price was for this property?

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- Q. Turn four pages earlier to page 18, which
- has Bates' Number WF-001795. 12
- 13 A. Okay. I guess it's just got one 7 and half 14 a 9 there.
- Q. Yes. But it also has the page number 18 15 under the PLEX numbering.
 - A. Okay.
 - Q. On the entry for August 7, there's an entry showing 312,893.32. Do you see that?
 - A. Yes.
- 21 Q. Do you understand that to be a wire
- transfer from the account Cobblestone to 22
- 23 First American Title?
- 24 A. Yes, I can see that.
- 25 Q. And was that the balance of the purchase

130 132 price for this home on Sherwood Drive? 1 saying. Q. Well, if a company was going to pay for the 2 2 A. It must have been. 3 Q. And if you look up to two lines, do you see 3 home, would you not expect the home to be in the earlier that day \$315,000 was wired from RaPower's 4 4 company's name? 5 bank account to Cobblestone's bank account? 5 A. I don't know. 6 A. Is this a Cobblestone account here? 6 Q. Did it seem odd to you to have the company 7 Q. Yes, it is, and you can turn two pages 7 pay for a home that was yours? earlier if you want to see the first page of that 8 8 A. I don't know. account. 9 9 Q. Isn't the essence here that the company 10 A. Okay. 10 bought something and gave it to you? 11 Q. So is it accurate that earlier that same 11 MR. PAUL: Objection. Calls for a legal 12 day that \$315,000 was wired from RaPower's bank 12 conclusion. Lack of foundation. account to Cobblestone bank account? 13 13 A. I don't know. 14 A. Yes. Q. Did the company pay for the purchase of 14 15 Q. Did you make that wire transfer, that 15 this home? 16 online transfer? A. Looks like it did. 16 A. Yes. Q. And the home is in your name; right? 17 17 Q. And was that transfer in order to be able 18 18 A. That is correct. 19 to fund Cobblestone's payment of the purchase price 19 Q. So the company paid for a home that you 20 for the Sherwood Drive home? 20 own? 21 A. Say that again. 21 A. That's in my name. 22 Q. Was that transfer from RaPower to 22 Q. Right. 23 Cobblestone in order to provide funding so that 23 A. I don't know that I own it. Cobblestone could pay for the purchase of the home on 24 24 Q. Oh. **Sherwood Drive?** 25 A. Just because it's in my name doesn't mean I 131 133 1 A. Yes. own it. I'm confused. 1 Q. Why did you make that transfer? Why did 2 2 Q. Okay. Then tell me what you -- tell me 3 you make -- let me start over. 3 what you understand your status is with this home. 4 Why did you use Cobblestone money to pay 4 MR. PAUL: Objection. Calls for a legal 5 for a home that is owned by you? 5 conclusion. A. I don't know. You'll have to ask 6 6 A. I don't know. You'll have to talk to my 7 Mr. Johnson. 7 attorneys and Mr. Johnson. I don't know why it was 8 Q. Did Mr. Johnson instruct you to use money 8 put in my name. from Cobblestone to buy a home that was going to be 9 Q. If I want to understand who owns a home, 9 owned only by you? 10 would I not look to see who's on the title of the 10 11 A. Say that again. 11 home? Q. Did Mr. Johnson instruct you to use 12 A. That's correct. 12 Cobblestone money to pay for this home? 13 Q. So you are on the title for this home; 13 14 A. To pay for the home, yes. 14 correct? 15 Q. And did Mr. Johnson instruct you that the 15 A. Correct. home should be held in your name? Q. So do you consider that you are the owner 16 16 17 A. It is in my name. 17 of this home? 18 Q. And I would like to understand the reason 18 A. My name is on the title. why you think money from the company can be used to Q. Okay. Do you consider you are the owner of 19 19 20 purchase a home that is owned by you? 20 this home? 21 A. You'll have to ask Mr. Johnson. 21 A. No. I don't consider that I am the owner 22 Q. I want to understand your perspective. Did 22 of the home. I know my name is on the title. you think it was odd to take money -- have the Q. Who do you think is the owner of this home? 23 23 24 company buy an asset that belonged to you? 24 A. I don't know. Just because my name is on 25 A. I'm confused. I don't know what you're the title doesn't mean that I own it. There's 25

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134 136 legal -- I don't know. I have no clue, and it's going way, way, way back 2 Q. I'm trying to understand your perception of 2 from my memory. it and how it is that you -- what you would 3 Q. Let's look on the first page. For example,

understand in terms of who is the owner of the home. 4 5 MR. PAUL: I'm going to object as to asked and 5 6 6 \$15,000.

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7 7 Q. So if you're not the owner the home, who do 8 you think is the owner of the home? 8

9 MR. PAUL: Objection. Asked and answered.

10 A. My name is on the title. That's all I

11 know.

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12 Q. Can this home be sold or transferred to 13 anyone else without your signature?

A. Well, if my name is on the house, then I 14 15 guess I'd have to have my signature on it.

16 Q. So can anyone else force you to give title on the home to someone else without your permission? 17

A. I don't know.

19 Q. What are the -- do you know how much the

20 total amount that RaPower, IAS, XSun, and Cobblestone

have paid to you since 2005? 21

22 A. No.

23 Q. You indicated earlier that, I believe, that

you didn't receive salaries and the only payments you 24

got were commissions for sales from RaPower for the

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downline. Did I remember that correctly? 1

2 A. Correct.

3 Q. Would you have received any money from IAS 4 paid to you?

A. I don't know. 5

Q. Can you think of any reason that IAS would 6

7 pay any money to you?

A. I don't know.

Q. Can you think of any reason that XSun would

10 pay any money to you?

11 A. I don't know.

Q. Can you think of any reason that 12

Cobblestone would pay any money to you? 13

A. I don't know.

15 MR. KLEIN: Mark this Exhibit 2009.

(Deposition Exhibit 2009 was marked.)

17 Q. You've been handed what's been marked

Exhibit 2009. This is a six-page spreadsheet

prepared by Lone Peak Valuation showing checks paid 19

20 to you from either IAS, RaPower, XSun, or Cobblestone

since 2005. And it shows a total of \$751,074.41. 21

22 Can you explain the reasons that these

23 entities would have made payments, paid you these

24 amounts?

A. I don't know. There's a lot of them here.

towards the bottom of the first page on January 10, 2011, there's a check payable to you in the amount of

Do you know why there would have been a check to you for \$15,000?

A. No.

10 Q. And then two days later a check to you in 11 the amount of \$30,000.

12 Do you know why there would be a check to 13 you for \$30,000?

A. No.

15 Q. On the next page on December 14 of 2011, 16 there's a check to you in the amount of \$70,000.

Do you see that? 17

A. What date?

19 Q. On December 14, 2011.

20 A. Okay.

Q. If we look over to the right column, we see

that that particular check was issued by RaPower. Do

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you remember why RaPower paid you \$70,000 in

24 December 2011?

25 A. No.

1 Q. Do you know what you would have done with

2 that money?

A. There was property bought in

4 Millard County.

5 Q. And did RaPower provide money to you that

you used to buy properties?

A. That's probably correct.

8 Q. And what properties are those in

9 Millard County that you bought with money from

RaPower? 10

A. I don't know right now. I don't have

12 documents in front of me.

Q. What documents do you have that would 13

14 answer that question?

A. I'd have to look and see what I could find.

15 16 Q. Do you, for example, have documents for the 17 closings of properties that were purchased in your

name?

20 Q. And would those records show you where the 21 money came from to purchase those properties?

22 A. I'm not sure.

Q. Do you have an estimate as to how many

24 properties you purchased with monies from RaPower?

A. Say that again.

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Q. Do you have an estimate about how many
properties that were purchased in your name using
money from RaPower?

4 A. I don't know.

5 MR. PAUL: Could we take a break?

6 MR. KLEIN: Let me ask one more question.

7 Q. Have you purchased any properties since

8 your marriage to Mr. Johnson that you used your own

9 money to purchase the properties?

10 A. Yes.

11 Q. Which ones?

12 A. The Oasis building.

13 Q. Any other properties?

14 A. I'm not sure.

15 Q. And how much did that Oasis building cost?

16 A. I don't know.

17 Q. And where did you get the money to purchase

18 that Oasis building?

19 A. From my inheritance.

20 Q. So was the Oasis building less than

21 \$150,000?

A. I don't know what it was.

23 MR. KLEIN: Okay. We can take a break.

24 (A break was taken.)

25 Q. (BY MR. KLEIN) Just before the break,

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Q. Do you have a recollection of an estimateabout what you paid for it?

A. Not exactly.

Q. Was it under 200,000?

5 A. For me personally?

Q. For the purchase of the building?

A. I'm just going to have to say I don't know

8 right now

Q. Okay. And for that purchase of that

10 building, it was exclusively your own money that paid

11 for it?

12 A. I'd have to ask Mr. Johnson.

Q. I'm asking your memory.

14 A. I don't know exactly. Okay. I know that a

15 lot of my money went into it. I don't know the

16 purchase of it.

17 Q. Did any of your money go into any of the18 other buildings in Millard County that are in your

19 name?

20 A. I don't know.

Q. In Exhibit 2009 we saw 751,074.41 that

22 constituted checks made payable to you from these

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23 four entities.

Did you also get some money from thesecompanies that was directly withdrawn from the

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Mrs. Johnson, you mentioned the Oasis building. Is

there only one building in Oasis? I'm trying to make

3 sure I identify the building correctly.

4 MR. PAUL: One building she owns in Oasis.

5 Q. Do you know the address of the building in

6 Oasis that you referenced?

7 A. 2730 West 4000 South. No. Did I say 27?

8 Q. Yes.

9 A. Yes.

10 Q. 2730 West 4000 South in Oasis.

11 A. Correct.

12 Q. What kind of building is that? Is it a

13 home? a warehouse? an office building?

14 A. A warehouse. There's an office in there.

15 Q. And when did you purchase that?

A. I'm not sure exactly when I purchased it.

17 Q. Approximately when?

18 A. I think it could have been in 2012.

19 Q. And was the purchase price less than

20 500,000?

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21 A. Well, yeah. Yes.

22 Q. Was it less than 300,000?

23 A. Yes.

24 Q. Was it less than 100,000?

25 A. No.

1 bank accounts that was not reflected in checks?

A. You've got me totally confused on what

3 you're saying.

4 Q. The prior exhibit, 2009, showed checks that

5 were written to you by these four companies.

Do you understand that?

7 A. What four companies?

Q. Cobblestone, IAS, XSun, and RaPower.

9 A. Okay.

10 Q. Do you understand that 2009 shows checks

11 issued by these four companies made payable to you?

12 A. In 2009?

Q. Exhibit 2009.

14 A. Oh. Well, you have it down here.

15 Q. Right. So I'm trying to put it in context.

16 Exhibit 2009 reflects checks from these four entities

17 made payable to you.

Do you understand that?

19 A. This exhibit shows other people that got

20 paid.

21 Q. It does not. This exhibit shows payments

22 to you. The seventh column shows who signed the

23 checks, but all of the checks in this exhibit were

24 made payable to you.

A. Well, what about the one right here that

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Glenda E. Johnson 142 144 says LaGrand T. Johnson? 1 A. I don't know. There's checks and 2 Q. And which page are you on? 2 transfers. Is that what you're asking me, sir? 3 A. The second page. 3 Q. Wait and let's let the reporter mark the 4 Q. What's the date? 4 exhibit. 5 A. 12/14/11. 5 (Deposition Exhibit 2010 was marked.) 6 Q. Okay. So that's a check that was made 6 Q. The reporter marked Exhibit 2010, which is 7 7 a five-page spreadsheet created by Lone Peak payable to you on the account of IAS where the check 8 was signed by LaGrand Johnson. So the top of that 8 Valuation that shows amounts withdrawn from bank 9 column you'll see that the names in that column 9 accounts that are not reflected in -- that were 10 reflect who the signer was of the check. 10 either cash withdrawals or checks made out to cash 11 A. Okay, sir. I am really confused. You said 11 that were signed by you. 12 that money was given to me. 12 So, for example, we have on the first page, second section, January 7, 2011, a \$10,000 withdrawal 13 Q. I'm saying this Exhibit 2009 is a 13 from Zions Bank where you made the withdrawal. 14 compilation of all the checks that Lone Peak 14 15 Valuation has found where the checks were made 15 Do you see that? 16 payable to you from these four companies. 16 MR. PAUL: Objection. Foundation. Now, I want to move to discuss that there 17 A. On what date? 17 18 were other ways that money was paid you to other than 18 Q. January 7, 2011. 19 checks. 19 A. Of \$10,000. 20 Do you understand that there are other ways 20 Q. Do you see that? 21 you could have gotten money from these companies A. Yes. 21 22 other than through checks? 22 Q. Do you know what that \$10,000 withdrawal 23 MR. PAUL: Objection. Foundation. 23 was for? 24 A. How you could I get money from these 24 A. No. 25 companies other than with checks? 25 Q. Do you know what you did with the money? 143 145 1 Q. You could -- have you ever gone to the bank 1 A. No. 2 and transferred money or made cash withdrawals? 2 MR. PAUL: Objection. Foundation. 3 A. I really don't understand, and I don't know Q. And the last page shows a total of \$8,872,663.27 in withdrawals from these 4 what you're talking about. 5 5 Q. Okay. Let me start over then. You have four companies withdrawn at your instruction other seem able to understand some questions and others 6 6 than checks. 7 you seem to have trouble with. 7 MR. PAUL: Objection. Lacks foundation. 8 MR. PAUL: Objection. That's an improper 8 Q. Do you know what this \$8.8 million was used 9 statement, Counsel. You can't badger her that way. 9 for? 10 Q. As a signer on the account, would you have A. No. 10 11 the ability to go into a bank and request a cash 11 Q. Do you have any records that would help you 12 withdrawal from the account? 12 answer this question? 13 A. Be at Snuffer, Dahle & Poulsen. 13 A. As a signer on the bank, to go in and get 14 cash out? 14 Q. What records would those be? 15 Q. Yes. 15 A. I guess bank records or invoices or -- I don't know. This just -- I don't know what you've 16 A. I guess I could. 16 17 Q. As a signer on a bank account, can you go 17 got down here. I don't understand any of it. in and ask for a cashier's check to be made out? 18 18 Q. Each of these reflects a bank record 19 19 showing money withdrawn from one of these accounts by A. I guess I could. 20 Q. Can you go in and ask for a wire transfer you, and so I'm trying to see if you recall the 21 reasons for any of these withdrawals and what you did 21 to be sent? 22 22 A. I guess I could. with the money. 23 Q. So are there times that you have taken 23 MR. PAUL: Objection. Lacks foundation.

24

A. I'm sorry. I just don't understand when

you're saying just because I've written out a check.

money from the accounts of RaPower, Cobblestone, IAS,

and XSun that are not reflected in checks?

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It doesn't tell me who it went to.

- 2 Q. These were not checks. This exhibit talks
- about where you've gone in and made a cash withdrawal
- or gotten a cashier's check. For example, turn to
- 5 the second page on June 27, 2012.
 - A. You've already done that one.
- 7 Q. We have there the example of the
- 8 1,498,150.85 that was withdrawn from the RaPower bank
- 9 account at Zions Bank and given to you as a cashier's
- 10 check; right?

6

- A. Right. And we talked about that. 11
- 12 Q. Yes. So these other transactions on here
- 13 were situations where you had gone in and made a --
- filled out a withdrawal slip from the bank. 14

15 And I'm trying to understand what your

16 memory is of the reasons for the withdrawals or which

- ones were cashier's checks or whether they were cash 17
- 18 withdrawals.
- A. I don't know. 19
- 20 MR. KLEIN: Please mark this as 2014. I'll skip
- 21 the other intervening numbers.
- 22 (Deposition Exhibit 2014 was marked.)
- 23 Q. Mrs. Johnson, you've been handed what's
- been marked as Exhibit 2014, which is a four-page 24
- 25 summary prepared by Lone Peak Valuation that shows
 - 147
 - checks from these entities that were made payable to
- 2 somebody else named Johnson.
- 3 The first batch shows checks payable to
- 4 Crystal Ann Johnson and Jeremy Johnson. Do you know
- 5 who Crystal Ann Johnson and Jeremy Johnson are?
- A. No. 6
- 7 Q. The column next to the end shows who signed
- 8 these checks. These are checks made in 2013 through
- 2018, and checks to Crystal Johnson and 9
- 10 Jeremy Johnson were signed by you.
- 11 Do you have any reason to doubt that?
- 12 A. I have no reason to.
- Q. Do you have any memory of who 13
- 14 Crystal Ann Johnson and Jeremy Johnson were?
- 15
- Q. Do you have any memory why payments were 16
- 17 made to them?
- A. No. 18
- 19 Q. Next section is Darian Johnson. Do you
- 20 know who Darian Johnson is?
- 21 A. Are these distributors?
- 22 MR. PAUL: He's asking you that question. Do
- you know who they are? If you do, you can answer 23
- 24 yes; if you don't, you can answer no. It's just a
- 25 yes-or-no question.

- A. I don't know.
- Q. Would you have taken it upon yourself to

148

- make these payments? 3
 - MR. PAUL: Objection. Foundation.
- 5 A. If my name was on it, then yes.
 - NELDON JOHNSON: If --
- 7 Q. Ordinarily --

Are you making an objection?

- NELDON JOHNSON: I want to make a clarification.
- 10 MR. KLEIN: You can make an objection. You
- 11 can't testify.
- 12 NELDON JOHNSON: I'm not. I'm just asking is
- 13 this the signer in this column here?
- 14 MR. KLEIN: The next to the last column
- 15 indicates who was a signer on the checks.
 - NELDON JOHNSON: But this is where it came from,
- 17 RaPower, the payor?
- MR. KLEIN: No, the payor is the bank account 18
- from which the check was drawn. 19
- 20 NELDON JOHNSON: Right, but the account was it
- 21 RaPower or -- is that the account?
- MR. KLEIN: Yes. 22
 - NELDON JOHNSON: So it came from RaPower?
- 24 MR. KLEIN: The first batch to
- 25 Crystal Ann Johnson, Jeremy Johnson, yes.
- 149 1 NELDON JOHNSON: So this is Jeremy Johnson -- so
 - 2 the checks that go to Jeremy Johnson, who was an
 - 3 employee or something like that, would that --
 - 4 MR. KLEIN: Mr. Johnson, if you have an
 - 5 objection, you can state it for the record. If you

 - 6 have a clarification --
 - 7 NELDON JOHNSON: I want to --
 - 8 MR. KLEIN: It's not appropriate for you to be
 - 9 providing answers.
 - 10 NELDON JOHNSON: No, I wasn't doing that. I was
 - looking to see if I understood what you were saying
 - 12 is in there.

- 13 Q. (BY MR. KLEIN) Okay. Mrs. Johnson, to the
- 14 extent that you wrote checks out to these people, how
 - would you decide whether or not to write checks to
- 16 these people?
- 17 A. If they were RaPower people who were
- 18 distributors that have the last name of Johnson and
- 19 they had a downline, then checks would have been
- 20 written out to these people that have the last name 21 of Johnson.
- 22 Q. Do you recognize the name of Erwin Johnson?
- 23 A. No.
- 24 Q. Do you recognize the name Garry Johnson and
- 25 Patricia Johnson?

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150 152 1 A. No. 1 Q. Do you know Linda Johnson? 2 Q. Do you recognize the name Jeron Johnson? 2 A. No. (Deposition Exhibit 2015 was marked.) 3 3 4 Q. Do you recognize Kyle Robert Johnson or 4 Q. Mrs. Johnson, you've been handed exhibit 5 Kari Johnson? 5 2015. This is a withdrawal slip from Wells Fargo, Account Number 6629 in the amount of \$23,000 on 6 A. No. 7 Q. Do you recognize the name Mandy Johnson? 7 July 27, 2012. Is that your signature on this withdrawal 8 8 Q. Do you recognize the name Marina Johnson? slip? 9 9 10 A. Marina is a granddaughter of Neldon, not 10 A. Looks like it. mine, but of Neldon. 11 Q. Is the other handwriting on this withdrawal 11 12 Q. Okay. Do you know why \$11,678 would have 12 slip yours? been paid to Marina Johnson? 13 13 A. No. 14 A. No. 14 Q. Do you know why you withdrew \$23,000 to 15 Q. Was she an employee of one of these 15 give to Linda Johnson? 16 companies? 16 A. No. 17 A. I don't know. 17 Q. Do you have any record you could consult Q. It looks like the payments are often that would help answer why \$23,000 was given to her? 18 18 19 consistent amounts. In 2011 five of them for 471.75, 19 A. I don't know. 20 Q. If you went to the bank and made 20 and then a number of others for \$235.87. 21 Does that help jog your memory as to why withdrawals, did you keep any sort of records that 21 22 IAS would have been making payment to Marina Johnson? 22 would tell you why you were making withdrawals or why 23 A. Sir, I didn't have anything to do with IAS. you were paying money to people? MR. PAUL: It's a yes-or-no question. You can 24 A. Say that again. 24 25 answer yes or no. 25 Q. If you went to the bank to withdrawal 151 153 money, would you have any records showing the reasons 1 Q. Do you know why IAS would have been making 2 payment to Marina Johnson? you made withdrawals or the reasons you paid money to 3 A. No. 3 people? 4 Q. Do you recognize the name Preston Johnson? 4 A. I don't know. I would assume. I just 5 5 A. Yes. don't know. Q. I'm trying to understand how I could find 6 Q. Who is Preston Johnson? 6 7 A. Mr. Johnson's grandson. an answer to this question so that I can find out 8 Q. Do you know why you signed a check to why -- who Linda Johnson is and why \$23,000 was given Preston Johnson from Cobblestone Centre on June 16, 9 to her. 9 2015 for 308.26? 10 A. You just have to go to Nelson, Snuffer, 10 11 MR. PAUL: That's a yes-or-no question. Do you 11 Dahle, all of their stuff that's down there. know why that check was written? 12 Q. Do they have records that would help answer 12 A. No. 13 this question? 13 14 Q. Was Preston Johnson an employee of any of 14 A. I'm assuming. I don't know. 15 the companies, to your knowledge? 15 Q. What kind of records at Nelson Snuffer 16 would help me answer this question? A. I don't know. 16 17 Q. Do you recognize the name Val Johnson? 17 A. The bank accounts. 18 A. No. 18 Q. And is the bank account going to tell me Q. Do you recognize the name Reiko Johnson? 19 who Linda Johnson is or why she was being paid 19 20 A. That's Neldon's daughter-in-law. 20 \$23.000? Q. Is she married to LaGrand? 21 21 A. I don't know. 22 22 Q. Would you have withdrawn this money without Q. Do you know why -- never mind. permission from Neldon Johnson? 23 23

24 **25**

Q. Does this jog your memory as to who

24

25

A. No.

Do you know Roger Johnson?

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222 224 224 226 22 A. I don't know. 2 A. A few. 3 Q. Do you own any solar lenses? 3 A. I don't know. 5 Q. How many? 4 A. Jon't know but was done. 9 Q. Are any of the lenses that you purchased linstalled? 11 A. I don't know. 9 Q. Are any of the lenses that you purchased linstalled? 12 Q. Have you received any revenue from the use of your lenses? 13 of your lenses? 14 A. I don't know. 9 Q. Do you own any structures other than what 16 we've talked about? 16 A. I don't know. 17 A. I don't know. 18 Q. Do you own any equipment other than what 17 you've identified? 20 A. I don't know. 31 A. I don't know. 42 We've identified? 21 A. I don't know. 32 Q. In Mr. Johnson's bankruptcy potition in 22 Z23		, - ,		
2 A. I don't know. 3 Q. Do you own any solar lenses? 4 A. A few. 5 Q. How many? 6 A. I don't know. 7 Q. Did you purchase them? 7 A. I don't know what you purchased in the state of our state of the state of colifornia. 2		222		224
2 A. I don't know. 3 Q. Do you own any solar lenses? 4 A. A few. 5 Q. How many? 6 A. I don't know. 7 Q. Did you purchase them? 7 A. I don't know what you purchased in the state of our state of the state of colifornia. 2	1	Q. Yes.	1	questions
3 Q. Do you own any solar lenses? 4 A. A few. 5 Q. How many? 6 A. I don't know. 7 Q. Did you purchase them? 8 A. I don't know how it was done. 9 Q. Are any of the lenses that you purchased 10 installed? 11 A. I don't know. 12 Q. Have you received any revenue from the use of your lenses? 13 of your lenses? 14 A. I don't know. 15 Q. Do you own any structures other than what we've talked about? 16 A. I don't know. 17 A. I don't know. 18 Q. Do you own any equipment other than what you've identified? 19 A. I don't know. 10 Q. Do you own any real estate other than what you've identified? 20 A. I don't know. 21 Q. Do you own any real estate other than what you've identified? 22 A. I don't know. 23 A. I don't know. 24 A. Yes. 25 Q. In Mr. Johnson's bankruptcy petition in 26 Time-share? 27 A. I don't know what you're talking about. 28 Q. A respanse still in use? Who owns that time-share? 29 A. I don't know what you're talking about. 30 Q. A respanse still in use? Who owns that time-share? 40 A. Yes. 41 Mr. KLEIN: Let me take a quick break and see if I have any more questions. 42 (A break was taken.) 43 A. Yes. 44 A. Yes. 45 Mr. KLEIN: Let me take a quick break and see if I have any more questions. 46 (A break was taken.) 47 Mr. KLEIN: Back on the record. Those are all time-share? 48 Mr. KLEIN: Back on the record. Those are all the questions I have. 49 Mr. Healty-Gallagher, do you have any questions? 40 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 40 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 41 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 42 Mr. PAUL: No. 43 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 44 Mr. Paul. How. 45 Mr. Paul. How. 46 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 46 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 47 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 48 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 49 Mr. KLEIN: Mr. Paul, did you want to ask any questions? 40 Mr. Lense and the feet and the feet and the f				·
4. A. A few. 5. Q. How many? 6. A. I don't know. 7. Q. Did you purchase them? 8. A. I don't know wit was done. 9. Q. Are any of the lenses that you purchased installed? 11. A. I don't know. 12. Q. Have you received any revenue from the use of your lenses? 13. A. I don't know. 14. A. I don't know. 15. Q. Do you own any structures other than what we've talked about? 16. A. I don't know. 17. A. I don't know. 18. Q. Do you own any structures other than what you've identified? 20. A. I don't know. 21. Do you own any real estate other than what you've identified? 22. A. I don't know. 23. A. I don't know. 24. Zo Do you own any real estate other than what we've talked about? 24. A. I don't know what you've identified? 25. A. I don't know what you've talking about. 26. Q. In Mr. Johnson's bankruptcy petition in 27. A. I don't know what you're talking about. 28. Q. Is that time-share still in use? Who owns that time-share? 29. A. Neldon and I. 20. A. Yes. 20. I have any more quesilons. 20. I have any more quesilons. 21. A. Yes. 22. That have any more quesilons. 22. MR. KLEIN: Let me take a quick break and see if lhave any more quesilons. 23. MR. KLEIN: Back on the record. Those are all the questions I have. 24. MR. KLEIN: Mr. Paul, did you want to ask any questions? 25. MR. RALY-GALLAGHER: Not at this time. 26. MR. KLEIN: Mr. Paul, did you want to ask any questions? 27. MR. PAUL: No. 28. MR. PAUL: No. 29. MR. PAUL: No.				
5 Q. How many? 6 A. I don't know. 7 Q. Did you purchase them? 8 A. I don't know how it was done. 9 Q. Are any of the lenses that you purchased installed? 10 installed? 11 A. I don't know. 12 Q. Have you received any revenue from the use of your lenses? 13 of your lenses? 14 A. I don't know. 15 Q. Do you own any structures other than what we've talked about? 16 Q. Do you own any equipment other than what you've identified? 17 A. I don't know. 18 Q. Do you own any real estate other than what you've identified? 20 A. I don't know. 21 Q. Do you own any real estate other than what we've identified? 22 A. I don't know. 24 C. Do you own any real estate other than what we've identified? 25 Q. In Mr. Johnson's bankruptcy petition in 26 Yes Park of Warth of the we've identified? 27 A. I don't know. 28 A. Ves. 29 Q. In Mr. Johnson's bankruptcy petition in 29 CERTIFICATE 2011 he listed ownership of a time-share interest from Worldmark by Wyndham. Are you familiar with that? 20 A. Ves. 31 COUNTY OF UTAIL J 32 COUNTY OF UTAIL J 33 COUNTY OF UTAIL J 44 TITLE 10 CERTIFY that the toreologic department of the time-share? 45 Q. What's the current status of that time-share? 46 A. Neldon and l. 47 A. Hon't know what you're talking about. 48 Q. Is that time-share still in use? Who owns that time-share? 48 A. Yes. 59 Q. What's the current on that time-share? 50 A. Neldon and l. 51 C. Are the payments current on that time-share? 51 A. Yes. 52 G. What's the current on that time-share? 53 A. Yes. 54 MR. KLEIN: Let me take a quick break and see if 11 have any more questions. 55 G. A Deak was taken.) 56 G. A preak was taken.) 57 MR. KLEIN: Back on the record. Those are all the questions I have. 58 MR. KLEIN: Mr. Paul, did you want to ask any questions? 59 MR. PAUL: No. 50 Letitia L. Meredith, CSR, EFS			_	
6 A. I don't know. 7 Q. Did you purchase them? 8 A. I don't know how it was done. 9 A. I don't know. 10 Installed? 11 A. I don't know. 12 Q. Have you received any revenue from the use in the way of your lenses? 13 of your lenses? 14 A. I don't know. 15 A. I don't know. 16 We've talked about? 17 A. I don't know. 18 Q. Do you own any structures other than what is we've talked about? 18 A. I don't know. 19 A. I don't know. 20 Do you own any equipment other than what is we've talked about? 21 A. I don't know. 22 A. I don't know. 23 A. I don't know. 24 We've identified? 25 A. I don't know. 26 Do you own any real estate other than what is we've identified? 27 A. I don't know. 28 A. I don't know. 29 A. I don't know. 20 In Mr. Johnson's bankruptcy petition in in in the state of the	_		-	
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2. Are any of the lenses that you purchased installed? A. I don't know. C. Have you received any revenue from the use of your lenses? A. I don't know. C. Do you own any structures other than what we've talked about? A. I don't know. C. Do you own any equipment other than what you've identified? A. I don't know. C. Do you own any real estate other than what we've identified? A. I don't know. C. Do you own any real estate other than what we've identified? A. I don't know. C. In going to say I don't we've identified? A. I don't know. C. In Mr. Johnson's bankruptcy petition in 223 244 255 261 272 273 274 275 275 275 275 276 A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know what you're talking about. C. Is that time-share? A. I don't know. C. Is that time-share? A. I don't know. C. Is that time-share? A. I don't know				* * *
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