

Jason N. Dixon (11884)  
JDIXON LAW, P.C.  
1155 N Canyon Street  
PO Box 842434  
Hildale, UT 84784  
Telephone: (435) 216-2084  
jason@jasondixonlaw.com

*Attorney for the United Effort Plan Trust*

---

**IN THE THIRD JUDICIAL DISTRICT COURT  
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

---

IN THE MATTER OF THE  
UNITED EFFORT PLAN TRUST,

(Dated November 9, 1942, Amended April 10, 1946, and Amended and Restated on November 3, 1998); and its TRUSTEES, including known trustees TRUMAN BARLOW, WARREN JEFFS, LEROY JEFFS, WINSTON BLACKMORE, JAMES ZITTING and WILLIAM E. JESSOP a/k/a WILLIAM E. TIMPSON and DOE TRUSTEES I THROUGH IX.

**NOTICE OF INTENT TO DISTRIBUTE  
PROPERTY (SIXTEENTH ROUND)**

Civil No. 053900848

Judge Richard D. McKelvie

---

Pursuant to the Court's February 26, 2016 Order: (1) Transferring Additional Duties and Authority to the Board; and (2) Reducing Court Oversight ("Order"), the United Effort Plan Trust ("Trust") provides notice that the Trust's Board of Trustees ("Board") anticipates distributing Trust property as specified below:

**I. EXPLANATION OF DISTRIBUTIONS**

The Board has reviewed the Petitions for Benefits filed by certain petitioning members of the Trust's beneficiary class identified in Part II below ("Petitioners") and has personally met with those Petitioners. Based thereon, the Board has determined that the Trust will transfer to the

Petitioners identified below certain properties, including improvements, as more particularly set forth below. The decisions of the Board have been based upon the Board members' life experiences, good judgment, common sense, and in consideration of the factors listed in section 6.4 of the Reformed Declaration of Trust.

The proposed distribution to each Petitioner is conditioned upon the Petitioner's payment to the Trust of a specified sum ("Distribution Price"), which sum has been determined by the Board, taking into consideration the factors of the Reformed Declaration of Trust, the value of the land, the value of the improvements, and the amount of unpaid occupancy fees associated with the property, as set forth below. In addition, the Petitioner receiving any distribution hereunder shall pay any and all additional costs for closing the transaction and title insurance premiums.

## **II. PROPERTY TO BE DISTRIBUTED**

1. The Board proposes to distribute to Allen Woodruff Steed property which consists of approximately 1.06 acres located at 960 N Hildale Street, Hildale, Washington County, Utah, and legally described as SHORT CREEK SUBDIVISION 9 AMENDED AND EXTENDED, LOT 8, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE WASHINGTON COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$285,200.00

b. Distribution Price

Land:	\$6,926.04
Improvements:	\$0.00

<u>Unpaid Occupancy Fees:</u>	\$300.00
<b>Total:</b>	<b>\$7,226.04</b>

2. The Board proposes to distribute to Edson J. Knudson property which consists of approximately 1.0 acres located at 845 N Juniper Street, Hildale, Washington County, Utah, and legally described as SHORT CREEK SUBDIVISION 3, LOT 28, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE WASHINGTON COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$111,400.00

b. Distribution Price

Land:	\$6,534.00
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$1,656.00
<b>Total:</b>	<b>\$8,190.00</b>

3. The Board proposes to distribute to Marylou and Louis Barlow Jr., property which consists of approximately 1.01 acres located at 965 N Juniper Street, Hildale, Washington County, Utah, and legally described as SHORT CREEK SUBDIVISION 3, LOT 11, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE WASHINGTON COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$107,700.00

b. Distribution Price

Land:	\$6,599.34
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$2,410.66
<b>Total:</b>	<b>\$9,010.00</b>

4. The Board proposes to distribute to Eric Draper property which consists of approximately 0.86 acres located at 740 N Willow Street, Hildale, Washington County, Utah, and legally described as SHORT CREEK SUBDIVISION 1, LOT 15, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE WASHINGTON COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$47,000.00

b. Distribution Price

Land:	\$5,619.24
Improvements:	\$0.00 <sup>1</sup>
<u>Unpaid Occupancy Fees:</u>	\$0.00
<b>Total:</b>	<b>\$5,619.24</b>

5. The Board proposes to distribute to Ezra Draper property which consists of approximately 0.85 acres located at 760 N Willow Street, Hildale, Washington County, Utah, and legally described as SHORT CREEK SUBDIVISION 1, LOT 16, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE WASHINGTON COUNTY RECORDER’S OFFICE, which property includes a residence.

---

<sup>1</sup> The Board has determined to distribute this property to Eric Draper based on the value of the land. The improvement on the property is a dilapidated mobile home. Mr. Draper will demolish and remove the mobile home and pay for all costs to do so.

a. Valuation

Appraisal:	None
County Assessed Value:	\$112,700.00 <sup>2</sup>

b. Distribution Price

Land:	\$5,553.90
Improvements:	\$30,810.00
<u>Unpaid Occupancy Fees:</u>	\$0.00

**Total: \$36,363.90**

6. The Board proposes to distribute to Elizabeth and Aaron Hammon property which consists of approximately 0.87 acres located at 285 N Willow Street, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 2601, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$63,575.00

b. Distribution Price

Land:	\$5,684.58
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$100.00

**Total: \$5,784.58**

---

<sup>2</sup> At the Draper's request, the Washington County Assessor's office conducted an onsite inspection of the property and determined that material corrections to the property's square footage, features, and condition were necessary and warranted. As a result, the new county assessed value is \$112,700. The County's website, however, does not yet reflect the new value.

7. The Board proposes to distribute to Sherwin Bateman property which consists of approximately 0.94 acres located at 440 W Garden Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 6803, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$39,983.00

b. Distribution Price

Land:	\$6,141.96
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$7,450.00

<b>Total:</b>	<b>\$13,591.96</b>
---------------	--------------------

8. The Board proposes to distribute to Judith Barlow property which consists of approximately 1.16 acres located at 25 W Plum Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 11601, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$227,428.00

b. Distribution Price

Land:	\$7,579.44
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$11,141.00

**Total:** **\$18,720.44**

9. The Board proposes to distribute to Moroni Draper property which consists of approximately 0.97 acres located at 440 N Oak Street, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 807, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$24,997.00

b. Distribution Price

Land:	\$6,337.98
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$0.00

**Total:** **\$6,337.98**

10. The Board proposes to distribute to Arthur L Barlow property which consists of approximately 1.36 acres located at 245 N Richard Street, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 2402, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$89,871.00

b. Distribution Price

Land:	\$8,886.24
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$3,100.00
<b>Total:</b>	<b>\$11,986.24</b>

11. The Board proposes to distribute to Theil L. Cooke property which consists of approximately 0.95 acres located at 85 W Cherry Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 11106, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$142,497.00

b. Distribution Price

Land:	\$6,207.30
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$0.00
<b>Total:</b>	<b>\$6,207.30</b>

12. The Board proposes to distribute to Robert Richter property which consists of approximately 0.97 acres located at 25 W Warren Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 9501, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$62,870.00



b. Distribution Price

Land:	\$6,337.98
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$400.00
<b>Total:</b>	<b>\$6,737.98</b>

13. The Board proposes to distribute to Daniel Barlow Sr. property which consists of approximately 0.89 acres located at 285 W Garden Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 8106, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$121,704.00

b. Distribution Price

Land:	\$5,815.26
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$0.00
<b>Total:</b>	<b>\$5,915.26</b>

14. The Board proposes to distribute to Marvin Wyler and Charlette Chatwin property which consists of approximately 0.84 acres located at 380 W Arizona Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 507, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$156,113.00

b. Distribution Price

Land:	\$5,488.56
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$100.00
<b>Total:</b>	<b>\$5,588.56</b>

15. The Board proposes to distribute to Marvin Wyler and Lori Wyler property which consists of approximately 0.68 acres located at 340 N Homestead Street, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 1806, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$76,615.00

b. Distribution Price

Land:	\$4,443.12
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$400.00
<b>Total:</b>	<b>\$4,843.12</b>

16. The Board proposes to distribute to Frank Jessop Sr. property which consists of approximately 1.17 acres located at 240 W Johnson Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 6404, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER’S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$101,783.00

b. Distribution Price

Land:	\$7,644.78
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$100.00
<b>Total:</b>	<b>\$7,744.78</b>

17. The Board proposes to distribute to Arthur Jeffs property which consists of approximately 1.01 acres located at 65 S Redwood Street, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 9, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$240,853.00

b. Distribution Price

Land:	\$6,599.34
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$10,400.00
<b>Total:</b>	<b>\$16,999.34</b>

18. The Board proposes to distribute to Dennis C Jessop property which consists of approximately 0.87 acres located at 280 W Johnson Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 6406, ACCORDING

TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$58,324.00

b. Distribution Price

Land:	\$5,684.58
Improvements:	\$23,289.75
<u>Unpaid Occupancy Fees:</u>	\$0.00

**Total: \$28,974.33**

19. The Board proposes to distribute to Cora Lee Witt property which consists of approximately 0.92 acres located at 325 W Uzona Avenue, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 501, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$68,136.00

b. Distribution Price

Land:	\$6,011.28
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$800.00

**Total: \$6,811.28**

20. The Board proposes to distribute to Gary Jessop property which consists of approximately 0.95 acres located at 285 S Hammon Street, Colorado City, Mohave County,

Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 7001, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$112,254.00

b. Distribution Price

Land:	\$6,207.30
Improvements:	\$75,162.50
<u>Unpaid Occupancy Fees:</u>	\$100.00
<b>Total:</b>	<b>\$81,469.80</b>

21. The Board proposes to distribute to Charles Douglas Cooke Jr., property which consists of approximately 0.96 acres located at 580 N Oak Street, Colorado City, Mohave County, Arizona, and legally described as SHORT CREEK SUBDIVISION, LOT 811, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE MOHAVE COUNTY RECORDER'S OFFICE, which property includes a residence.

a. Valuation

Appraisal:	None
County Assessed Value:	\$139,847.00

b. Distribution Price

Land:	\$6,272.64
Improvements:	\$16,516.00
<u>Unpaid Occupancy Fees:</u>	\$0.00
<b>Total:</b>	<b>\$22,788.64</b>

22. The Board proposes to distribute to Allen Woodruff Steed property which consists of approximately 2.05 acres of vacant land located at 360 E Newel Avenue, Hildale, Washington County, Utah, and legally described as SHORT CREEK SUBDIVISION 9 AMENDED AND EXTENDED, LOT 5, ACCORDING TO THE OFFICIAL PLAT THEREOF ON FILE AND OF RECORD IN THE WASHINGTON COUNTY RECORDER’S OFFICE.

c. Valuation

Appraisal:	None
County Assessed Value:	\$53,000.00

d. Distribution Price

Land:	\$13,394.70
Improvements:	\$0.00
<u>Unpaid Occupancy Fees:</u>	\$300.00
<b>Total:</b>	<b>\$13,694.70</b>

**III. PROCEDURE**

Pursuant to the Order, this notice (“Notice”) will be filed with the Court and posted on the Trust website ([www.ueptrust.com](http://www.ueptrust.com)). Any interested person or party who elects to challenge the Board’s decision to distribute any of the property described in this Notice must, within ten (10) calendar days of filing this Notice, file with the Court a written objection to the Notice and a request to submit (“Objection”).

Upon filing of an Objection, the Court will make a determination whether the Board’s decision as described in the Notice needs further judicial review, and if so, will notify the Board within five (5) calendar days of the filing of the Objection. In such case, the Board’s decision will not be authorized until the Court makes a specific ruling.

However, the filing of an Objection will not stay the Trust from implementing the distribution described in this Notice, unless the Court affirmatively determines that the Board's decision needs further judicial review and so notifies the Board within five (5) calendar days of the filing of the Objection.

If no Objection is timely filed within ten (10) calendar days after filing and publicizing the Notice in accordance with the Order, the Board's decision to distribute becomes operative and may be implemented by the Trust in accordance with the Order.

DATED this 20<sup>th</sup> day of December, 2018.

JDIXON LAW, P.C.

/s/ Jason N. Dixon  
Jason N. Dixon  
*Attorney for the United Effort Plan Trust*

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **NOTICE OF INTENT TO DISTRIBUTE PROPERTY (SIXTEENTH ROUND)** was served this 20<sup>th</sup> day of December, 2018 via the Court's Notice of Electronic Filing (NEF) system to the attorneys of record signed up for e-filing and via-email to the following:

Ronald Rohbock (attaenterprise@gmail.com)

/s/ Jason N. Dixon