

**RECEIVER’S EIGHTEENTH QUARTERLY REPORT FOR RECEIVERSHIP ESTATES
(JANUARY 1, 2026 – MARCH 31, 2026)**

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the Court’s December 2, 2021 *Order Appointing Receiver* [ECF No. 17] (the “Receivership Order”)) and receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case” or “Receivership”), hereby files this *Receiver’s Eighteenth Quarterly Report for Receivership Estates* (the “Report”) for the period of January 1, 2026 to March 31, 2026.¹ The Receivership Order requires the Receiver to file a report within thirty (30) days of the end of each calendar quarter. Reasonable efforts have been made to fairly and accurately summarize the current status of the Receivership but any summary, of necessity, will omit details. The Receiver will be available to attend a status conference or otherwise respond to the Court’s questions at the Court’s request.

I. INTRODUCTION

1. At the beginning of the first quarter of 2026, the Receiver had \$1,277,429.13 on deposit. At the end of this Reporting Period (defined below), after payments of operating expenses and Court-approved fees and expenses, the amount on deposit was \$1,224,761.68. As of the filing of this Report (April 15, 2026), \$1,224,809.07 is in the Receivership bank accounts.

II. BACKGROUND

2. On December 1, 2021, the United States Securities and Exchange Commission (the “Commission”) filed its *Emergency Motion for a Temporary Restraining Order and Emergency Ancillary Relief* [ECF No. 3], which included an application for the appointment of a receiver for the Receivership Parties.

3. On December 2, 2021, this Court determined that entry of an order appointing a

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Receivership Order.

receiver over the Receivership Parties was both necessary and appropriate to marshal, conserve, hold, and operate all of the Receivership Parties' assets pending further order of this Court. Accordingly, the Court entered the Receivership Order on December 2, 2021, appointing Deborah D. Williamson as the Receiver over the Estates in this Case [ECF No. 17]. That same day, the Court entered the *Order for Temporary Restraining Order and Other Emergency Relief* [ECF No. 12].

4. Pursuant to the Receivership Order, the Receiver is charged with:

marshaling and preserving all the assets of the Defendants (the "Receivership Assets") and those assets of the Relief Defendants that: (a) are attributable to funds derived from investors or clients of the Defendants; (b) are held in constructive trust for the Defendants; (c) were fraudulently transferred by the Defendants; and/or (d) may otherwise be includable as assets of the estates of the Defendants (collectively, the "Recoverable Assets").

Receivership Order, ¶ 2.

5. Additionally, the Receivership Order provides:

Within thirty (30) days after the end of each calendar quarter, the Receiver shall file and serve a full report and accounting of each Receivership Estate (the "Quarterly Status Report"), reflecting (to the best of the Receiver's knowledge as of the period covered by the report) the existence, value, and location of all Receivership Property, and of the extent of liabilities, both those claimed to exist by others and those the Receiver believes to be legal obligations of the Receivership Estates.

Receivership Order, ¶ 56.

6. The Quarterly Status Report is directed to contain the following:

- A. A summary of the operations of the Receiver;
- B. The amount of cash on hand, the amount and nature of accrued administrative expenses, and the amount of unencumbered funds in the estate;
- C. A schedule of all the Receiver's receipts and disbursements (attached as Exhibit A to the Quarterly Status Report), with one column for the quarterly

period covered and a second column for the entire duration of the receivership;

- D. A description of all known Receivership Property, including approximate or actual valuations, anticipated or proposed dispositions, and reasons for retaining assets where no disposition is intended;
- E. A description of liquidated and unliquidated claims held by the Receivership Estate, including the need for forensic and/or investigatory resources; approximate valuations of claims; and anticipated or proposed methods of enforcing such claims (including likelihood of success in: (i) reducing the claims to judgment; and (ii) collecting such judgments);
- F. A list of all known creditors with their addresses and the amounts of their claims;
- G. The status of Creditor Claims Proceedings, after such proceedings have been commenced; and
- H. The Receiver's recommendations for a continuation or discontinuation of the receivership and the reasons for the recommendations.

Receivership Order, ¶ 57.

7. As stated above, the Receiver was appointed on December 2, 2021. The Receiver previously filed the *Receiver's First Quarterly Report for Receivership Estates* [ECF No. 126] for the period of December 2, 2021 through December 31, 2021. The *Receiver's Second Quarterly Report for Receivership Estates* [ECF No. 189] was filed May 2, 2022, covering the period of January 1, 2022 through March 31, 2022. The *Receiver's Third Quarterly Report for Receivership Estates* [ECF No. 242] was filed July 30, 2022, covering the period of April 1, 2022 through June 30, 2022. The Receiver's *Fourth Quarterly Report for Receivership Estates* [ECF No. 274] was filed October 31, 2022, covering the period of July 1, 2022 through September 30, 2022. The *Receiver's Fifth Quarterly Report for Receivership Estates* [ECF No. 320] was filed January 27, 2023, covering the period of October 1, 2022 through December 31, 2022. The *Receiver's Sixth Quarterly Report for Receivership Estates* [ECF No. 350] was filed on April 14, 2023, covering the period of January 1, 2023 through March 31, 2023. The *Receiver's*

Seventh Quarterly Report for Receivership Estates [ECF No. 386] was filed on August 14, 2023, covering the period of April 1, 2023 through June 30, 2023. The *Receiver's Eighth Quarterly Report for Receivership Estates* [ECF No. 426] was filed on October 30, 2023, covering the period of July 1, 2023 through September 30, 2023. The *Receiver's Ninth Quarterly Report for Receivership Estates* [ECF No. 452] was filed on January 30, 2024, covering the period of October 1, 2023 through December 31, 2023. The *Receiver's Tenth Quarterly Report for Receivership Estates* [ECF No. 496] was filed on April 30, 2024, covering the period of January 1, 2024 through March 31, 2024. The *Receiver's Eleventh Quarterly Report for Receivership Estates* [ECF No. 571] was filed on July 16, 2024, covering the period of April 1, 2024 through June 30, 2024. The *Receiver's Twelfth Quarterly Report for Receivership Estates* [ECF No. 601] was filed on October 17, 2024, covering the period of July 1, 2024 through September 30, 2024. The *Amended Receiver's Thirteenth Quarterly Report for Receivership Estates* [ECF No. 668] was filed on January 6, 2025, covering the period October 1, 2024 through December 31, 2024. The *Receiver's Fourteenth Quarterly Report for Receivership Estates* [ECF No. 740] was filed on April 29, 2025, covering the period of January 1, 2025 through March 31, 2025. The *Receiver's Fifteenth Quarterly Report for Receivership Entities* [ECF No. 767] was filed on July 16, 2025, covering the period of April 1, 2025 through June 30, 2025. The *Receiver's Sixteenth Quarterly Report for Receivership Entities* [ECF No. 795] was filed on October 30, 2025, covering the period of July 1, 2025 through September 31, 2025. The *Receiver's Seventeenth Quarterly Report for Receivership Entities* [ECF No. 808] (the "Seventeenth Report") was filed on January 30, 2026, covering the period of October 1, 2025 through December 31, 2025. This Report covers the period of January 1, 2026 through March 31, 2026 (the "Reporting Period"). Certain information or activity subsequent to March 31, 2026, may

be included for context and/or completeness.

8. In prior quarterly reports, the Receiver has discussed in great detail the Court-approved claims procedure, distribution methodology, and distribution plan. As such, that content will not be repeated in this Report. Prior quarterly reports filed by the Receiver are available to access free of charge on the Receivership website at <https://heartlandreceivership.com/receiver-reports>.

9. If and when the Receiver determines that additional funds are available for distribution and/or the Receivership closes, the Receiver may propose future distribution(s). The Receiver does not believe that there will be another significant distribution to investors or other creditors absent a substantial recovery from the sale of the Bahamas Properties, Val Verde and Crockett counties with respect to the Court-approved modified farmout agreement, and/or the *Final Judgments* entered by this Court.

10. **The Receiver does not believe that the ultimate recovery will be sufficient to return the full amount of principal contributions to Heartland investors and pay in full all claims of non-investor creditors.**

11. On March 25, 2025, the Court entered the *Order* [ECF No. 727] closing this Case for administratively for statistical purposes. The Receiver continues her work to maximize the ultimate recovery to the Receivership Estates as detailed in this Report.

III. GENERAL OVERVIEW

12. The Receivership Parties were generally in the business of investing in, purchasing, operating, and producing oil and gas assets. Certain Receivership Parties also own (or owned) real estate and other property. The Receiver has continued to actively recover and investigate assets and liabilities of the Receivership Estates. In prior quarters, the Receiver has taken possession of and sold two aircraft, vehicles, multiple pieces of oil field and construction equipment, real

property, Dallas Cowboy tickets, and personal property and abandoned hundreds of operating and non-operating wells that could not be sold, pursuant to Court-approved sale procedures. The Receiver has obtained and preserved hard and electronic data from multiple locations controlled by one or more Receivership Parties, their former counsel, and in Panama. The Receiver and her team have analyzed thousands of documents, including, but not limited to, oil and gas documentation, bank account statements, and document production from various parties in interest. The Receiver and her team prepared for and participated in a mediation and entered into a mediator's proposal, which, ultimately, resulted in the settlement of significant causes of action, including against Locke Lord. The Receiver has worked with various counsel, including, but not limited to, her lead counsel, Dykema Gossett PLLC ("Dykema"), Romero | Kosub, the Law Practice of Darrell R. Jones, PLLC, Reid Collins Tsai LLP, and Higgs & Johnson ("H&J"). The Receiver has also worked closely with Ahuja & Clark, PLLC n/k/a Ahuja & Consultants, Inc. ("A&C") on tax, accounting, and tracing issues, Vicki Palmour Consulting LLC on regulatory, compliance, abandonment, and escheatment issues, and PricewaterhouseCoopers Advisory (Bahamas) Limited ("PwC") to assist her in The Bahamas with various responsibilities related to the Bahamas Properties. Many of the tasks performed by the Receiver apply equally to each of the Receivership Estates. Accordingly, the statements and reports contained within this Report should be read to apply equally to each of the Receivership Estates, except where specifically noted to apply to a specific Receivership Estate.

IV. REPORT

13. During this Reporting Period, the Receiver's primary focus was preparation of the two Bahamas real properties (together, the "Bahamas Properties") for sale. A more detailed summary of the events that occurred prior to the update provided below is available in the Seventeenth Report.

A. BAHAMAS PROPERTIES

14. A high-level overview of the tasks and activities supervised, directed, or performed by PwC during this Reporting Period includes:

A. Upkeep and Security

- Continued routine maintenance and security monitoring for the Bahamas Properties. PwC continues to engage local workers to finish major repairs and prepare the Bahamas Properties for sale.

B. Administrative Tasks

- Continued to coordinate with the Central Bank of The Bahamas to secure approval for currency designation for new bank account in The Bahamas, which includes both BSD and USD designations.
- Identified potential real estate firms to market and sell the Bahamas Properties and began drafting and negotiating engagement letter and Multiple Listing Service (MLS) agreement with broker.

B. UPDATE ON FARMOUT REVENUE

15. The operations of SDMB Resources LLC (“SDMB”), as farmee and contract operator, in Val Verde and Crockett counties have continued to deliver very little production. SDMB asserts that it continues to address operational issues in hopes of increasing production. During the Reporting Period, the Receiver did not receive any money from SDMB representing revenue from production relating to the Court-approved modified farmout agreement.

C. TAX AND FORENSIC ACCOUNTING UPDATE

16. During the Reporting Period, A&C finalized expense allocations for the Receivership Parties and prepared and submitted federal tax returns for the 2025 tax year for certain Receivership Parties with filing obligations. On March 17, 2026, Schedule K-1’s were

mailed to equity investors in The Heartland Group Ventures, LLC, The Heartland Group Fund III, LLC, Heartland Drilling Fund I, LP, Encypher Bastion, LLC, ArcoOil Corp., and Carson Oil Field Development Fund II, LP.

D. SETTLEMENT PAYMENTS

17. The Court has entered *Final Judgments* against certain Defendants and/or Relief Defendants to date. *See generally* ECF Nos. 591, 594, 595.² The chart detailing the settlement payments due pursuant to *Final Judgments* entered in this Case can be found in the Seventeenth Report. **No settlement payments have been received by the Receiver as of the filing of this Report.**

18. Additionally, the Commission has entered administrative orders with respect to certain financial advisors outside of this Case, whereby the respective financial advisor is ordered to remit settlement payments to the Receiver.³ The chart detailing the settlement payments to be remitted to the Receiver for the benefit of the Receivership Estates based on the Commission's administrative orders entered to date can be found in the Seventeenth Report. **No such payments have been received by the Receiver as of the filing of this Report.**

19. To the extent funds are actually received, it is currently the intent of the Receiver

² The *Final Judgments* can be reviewed on the Receivership website free of charge under "Non-Receiver Court Filings" at <https://heartlandreceivership.com/key-court-documents>.

³ The Commission has obtained *Orders* against advisors David C. Underwood, Marc J. Toomey, Stephen R. Bishop, and Richard K. Diamond, in which the aforementioned parties stipulate to "Heartland and its principals us[ing] investor funds to make more than \$26 million in Ponzi payments to debt fund investors." *See* Richard K. Diamond, Securities Act of 1933 Release No. 11333, Securities Exchange Act of 1934 Release No. 101847, Investment Advisers Act of 1940 Release No. 6784, Investment Company Act of 1940 Release No. 35407, SEC File No. 3-22340 (Dec. 9, 2024), <https://www.sec.gov/files/litigation/admin/2024/33-11333.pdf>; Stephen R. Bishop, Securities Act of 1933 Release No. 11334, Securities Exchange Act of 1934 Release No. 101848, SEC File No. 3-22341 (Dec. 9, 2024), <https://www.sec.gov/files/litigation/admin/2024/33-11334.pdf>; Marc J. Toomey, Securities Act of 1933 Release No. 11335, Securities Exchange Act of 1934 Release No. 101853, SEC File No. 3-22342 (Dec. 9, 2024), <https://www.sec.gov/files/litigation/admin/2024/33-11335.pdf>; David C. Underwood, Securities Act of 1933 Release No. 11336, Securities Exchange Act of 1934 Release No. 101854, SEC File No. 3-22343 (Dec. 9, 2024), <https://www.sec.gov/files/litigation/admin/2024/33-11336.pdf>.

to seek Court approval to distribute those funds solely to holders of allowed claims in Class 4a (Heartland investors) as a return of capital. The timing and actual receipt of funds will determine the timing and amount of such distributions.

E. POTENTIAL CLAIMS

A. *Simplex Belli/Xplor Mobility*

20. During the Reporting Period, the Receiver continued investigating the alleged relationship between certain Heartland-related Receivership Parties, Simplex Belli Partners LLC” (“Simplex Belli”), and Xplor Mobility” (“Xplor Mobility”) based on information received from Defendant Rustin Brunson (“Brunson”), former fund manager and general counsel to Heartland-related Receivership Parties and publicly available information.

21. The Receiver anticipates filing a notice of abandonment of any Receivership Party’s interest in Simplex Belli and/or Xplor Mobility based on current information.

B. *Mary Louise Ridinger and/or Bonampak, SA*

22. The Receiver continues her attempts to contact Ms. Ridinger or Bonampak, SA; however, she has not received a response as of the filing of this Report.

C. *Ramiro Lemus Villeda*

23. The Receiver’s team continues to investigate and attempt to reach a resolution with Mr. Villeda; however, the Receiver has not reached a resolution as of the filing of this Report.

F. RECEIPTS AND DISBURSEMENTS

24. During the Reporting Period, the Receiver deposited \$397.11 relating to interest and other income. As required by the Receivership Order, a Receipts and Disbursements chart is attached hereto as Exhibit A.

Dated: April 15, 2026

Respectfully submitted,

By: /s/ Danielle Rushing Behrends

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COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2026, the foregoing document was served via CM/ECF on all parties appearing in this case, including counsel for Plaintiff, United States Securities and Exchange Commission.

/s/ Danielle Rushing Behrends

Danielle Rushing Behrends

EXHIBIT A

RECEIPTS AND DISBURSMENTS

| | Current Period 1/1/2026 - 3/31/2026 | Cumulative |
|--|--|-------------------------|
| 1. CASH AT BEGINNING OF PERIOD | | |
| *3863 IBC Account | \$ 84,259.79 | |
| *1565 Western Alliance Account | \$ 250,114.65 | |
| *0955 Western Alliance Sweep Account | \$ 750,683.91 | |
| *4056 Western Alliance Account | \$ 125,472.06 | |
| *0216 Western Alliance Account | | |
| *2548 Western Alliance Account | \$ 66,898.72 | |
| *3898 IBC Account | | |
| *7536 IBC Account | | |
| | \$ 1,277,429.13 | |
| 2. RECEIPTS | | |
| <i>*3863 IBC Account</i> | | |
| Total Deposits to *3863 | \$ - | \$ 14,483,455.25 |
| <i>*1565 Western Alliance Account</i> | | |
| 01/01/2026 Transfer from *4056: \$57.55 | | |
| 01/01/2026 Transfer from *2548: \$30.68 | | |
| 01/31/2026 Interest Income | 63.29 | |
| 02/01/2026 Transfer from *4056: \$31.76 | | |
| 02/01/2026 Transfer from *2548: \$16.94 | | |
| 02/28/2026 Interest Income | 55.62 | |
| 03/01/2026 Transfer from *4056: \$27.91 | | |
| 03/01/2026 Transfer from *2548: \$14.88 | | |
| 03/18/2026 Transfer from *0955: \$1789.05 | | |
| 03/31/2026 Interest Income | 61.58 | |
| Total Deposits to *1565 | \$ 180.49 | \$ 40,051.52 |
| <i>*0955 Western Alliance Sweep Account</i> | | |
| 01/30/2026 Interest Income | 12.72 | |
| 01/02/2026 Transfer from *1565: \$202.88 | | |
| 02/02/2026 Transfer from *1565: \$111.99 | | |
| 02/27/2026 Interest Income | 11.48 | |
| 03/02/2026 Transfer from *1565: \$98.41 | | |
| 03/31/2026 Interest Income | 12.70 | |
| Total Deposits to *0955 | \$ 36.90 | \$ 209,361.14 |
| <i>*4056 Western Alliance Account</i> | | |
| 01/01/2026 Interest Income | 57.55 | |
| 01/31/2026 Interest Income | 31.76 | |
| 02/28/2026 Interest Income | 27.91 | |
| Total Deposits to *4056 | \$ 117.22 | \$ 9,421,679.43 |
| <i>*2548 Western Alliance Account</i> | | |
| 01/01/2026 Interest Income | 30.68 | |
| 01/31/2026 Interest Income | 16.94 | |
| 02/28/2026 Interest Income | 14.88 | |
| Total Deposits to *2548 | \$ 62.50 | \$ 26,860.73 |
| <i>*0216 Western Alliance Account (Account Closed)</i> | | |
| | \$ - | |

| | Current Period 1/1/2026 - 3/31/2026 | Cumulative |
|---|--|-------------------------|
| Total Deposits to *0216 | \$ - | \$ 2,972.20 |
| <i>*3898 IBC Account (Account Closed)</i> | | |
| | \$ - | |
| Total Deposits to *3898 | \$ - | \$ 1,439,917.28 |
| <i>*7536 IBC Account (Account Closed)</i> | | |
| | \$ - | |
| Total Deposits to *7536 | \$ - | \$ 0.01 |
| 3. TOTAL RECEIPTS | \$ 397.11 | \$ 25,624,297.56 |
| 4. TOTAL CASH AVAILABLE FOR OPERATIONS (Line 1 + Line 3) | \$ 1,277,826.24 | |
| 5. DISBURSEMENTS | | |
| <i>*3863 IBC Account</i> | | |
| 01/22/2026 Check #1400 to Texas Secretary of State Filing Fees | 15.00 | |
| 03/13/2026 Check #1409 to Dykema Gossett PLLC Receiver & Legal Fees | 37,321.01 | |
| 03/19/2026 Check #1408 to Texas Secretary of State Filing Fees | 30.00 | |
| 03/25/2026 Check Card to Corp E Corp Taxes - Franchise | 300.00 | |
| 03/25/2026 Check #1411 to Ahuja & Consultants, LLC Accounting | 9,839.00 | |
| 03/31/2026 Check #1410 to Stretto Professional Fees | 3,770.50 | |
| Total Disbursements from *3863 | \$ 51,275.51 | \$ 7,941,157.40 |
| <i>*1565 Western Alliance Account</i> | | |
| 01/2/2026 Transfer to *0955: \$202.88 | | |
| 02/02/2026 Transfer to *0955: \$111.99 | | |
| 03/02/2026 Transfer to *0955: \$98.41 | | |
| 03/18/2026 Wire to Higgs & Johnson Receiver & Legal Fees | 1,789.05 | |
| Total Disbursements from *1565 | \$ 1,789.05 | \$ 844,329.57 |
| <i>*0955 Western Alliance Sweep Account</i> | | |
| 03/18/2026 Transfer to *1565: \$1,789.05 | | |
| Total Disbursements from *0955 | \$ - | \$ - |
| <i>*4056 Western Alliance Account</i> | | |
| 01/31/2026 Transfer to *1565: \$31.76 | | |
| 02/28/2026 Transfer to *1565: \$27.91 | | |
| 03/31/2026 Transfer to *1565: \$30.91 | | |
| Total Disbursements from *4056 | \$ - | \$ 9,249,676.77 |
| <i>*2548 Western Alliance Account</i> | | |
| 01/31/2026 Transfer to *1565: \$16.94 | | |
| 02/28/2026 Transfer to *1565: \$14.88 | | |
| 03/31/2026 Transfer to *1565: \$16.48 | | |
| Total Disbursements from *2548 | \$ - | \$ 4,933,141.28 |
| <i>*0216 Western Alliance Account (Account Closed)</i> | | |
| | - | |
| Total Disbursements from *0216 | \$ - | \$ 650,000.00 |
| <i>*3898 IBC Account (Account Closed)</i> | | |
| | \$ - | |
| Total Disbursements from *3898 | \$ - | \$ 781,215.86 |

| | Current Period 1/1/2026 - 3/31/2026 | Cumulative |
|---|--|-------------------------|
| <i>*7536 IBC Account (Account Closed)</i> | \$ - | |
| Total Disbursements from *7536 | \$ - | \$ 15.00 |
| 6. TOTAL DISBURSEMENTS | \$ 53,064.56 | \$ 24,399,535.88 |
| | | |
| 7. ENDING CASH BALANCE (Line 4 - Line 6) | | |
| <i>*3863 IBC Account</i> | \$ 32,984.28 | |
| <i>*1565 Western Alliance Account</i> | \$ 250,061.58 | |
| <i>*0955 Western Alliance Sweep Account</i> | \$ 749,345.04 | |
| <i>*4056 Western Alliance Account</i> | \$ 125,472.06 | |
| <i>*0216 Western Alliance Account (Account Closed)</i> | \$ - | |
| <i>*2548 Western Alliance Account</i> | \$ 66,898.72 | |
| <i>*3898 IBC Account (Account Closed)</i> | | |
| <i>*7536 IBC Account (Account Closed)</i> | | |
| | \$ 1,224,761.68 | \$ 1,224,761.68 |