IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

UNITED STATES SECURITIES	§	
AND EXCHANGE COMMISSION,	ş	
	ş	
Plaintiff,	§	
,	§	
V.	ş	
	ş	
THE HEARTLAND GROUP VENTURES, LLC;	§	
HEARTLAND PRODUCTION AND RECOVERY	§	
LLC; HEARTLAND PRODUCTION AND	§	
RECOVERY FUND LLC; HEARTLAND	§	
PRODUCTION AND RECOVERY FUND II LLC;	§	
THE HEARTLAND GROUP FUND III, LLC;	§	
HEARTLAND DRILLING FUND I, LP; CARSON	§	
OIL FIELD DEVELOPMENT FUND II, LP;	§	
ALTERNATIVE OFFICE SOLUTIONS, LLC;	§	
ARCOOIL CORP.; BARRON PETROLEUM	§	
LLC; JAMES IKEY; JOHN MURATORE;	§	
THOMAS BRAD PEARSEY; MANJIT SINGH	§	No. 4-21CV-1310-O
(AKA ROGER) SAHOTA; and RUSTIN	§	
BRUNSON,	§	
BRUNSON,	§	
BRUNSON, Defendants,	§ §	
	§ § §	
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	\$ \$ \$ \$ \$ \$	
Defendants, and	\$ \$ \$ \$ \$ \$ \$	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL	~ ~ ~ ~ ~ ~ ~ ~ ~	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC;	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA;	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.;	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.;	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA CAPITAL LLC; and 1178137 B.C. LTD.,	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
Defendants, and DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA CAPITAL LLC; and 1178137 B.C. LTD.,	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	

RECEIVER'S RESPONSE TO MOTION TO TERMINATE OR MODIFY ASSET FREEZE AND RECEIVERSHIP ORDERS, MEMORANDUM IN SUPPORT, AND NOTICE OF CORRECTION TO DECLARATION OF SUNNY SAHOTA [Relates to ECF Nos. 129, 130, and 142]

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the "<u>Receiver</u>") over the <u>Receivership Parties</u> (as defined in this Court's December 2, 2021 Order Appointing Receiver [ECF No. 17] (the "<u>Receivership Order</u>"),¹ files this Response (the "<u>Response</u>") to Motion to Terminate or Modify Asset Freeze and Receivership Orders [ECF No. 129] (the "<u>Motion</u>"), Memorandum in Support of Motion to Terminate or Modify Asset Freeze and Receivership Orders [ECF No. 129] (the "<u>Motion</u>"), Memorandum in Support of Motion to Terminate or Modify Asset Freeze and Receivership Orders [ECF No. 130] (the "<u>Memorandum</u>"), and the Notice of Correction to Declaration of Sunny Sahota [ECF No. 142] (the "<u>Corrected Sahota Declaration</u>")² filed on behalf of Defendant Manjit Singh (aka Roger) Sahota ("<u>Roger</u>") and Relief Defendants Harprit Sahota ("<u>Harprit</u>"), Sunny Sahota ("<u>Sunny</u>"), and Monrose Sahota ("<u>Monrose</u>") (collectively, the "Sahotas").

As demonstrated in the accompanying Brief in support of this Response, which is incorporated herein by reference, the Sahotas are not entitled to any of the relief requested.

The Receiver respectfully requests that the Court deny all of the relief requested by the Sahotas.

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

 $^{^2}$ The Corrected Sahota Declaration merely corrects that the Sahotas "received approximately \$12 million from sources other than Heartland between January 2018 and September 2021." Corrected Sahota Declaration ¶ 16, at p. 10 n.8.

Dated: March 8, 2022

Respectfully submitted,

By /s/ Danielle N. Rushing

Jeffrey R. Fine State Bar No. 07008410 jfine@dykema.com Alison R. Ashmore State Bar No. 24059400 aashmore@dykema.com **DYKEMA GOSSETT PLLC** 1717 Main Street, Suite 4200 Dallas, Texas 75201 Telephone: (214) 462-6400 Facsimile: (214) 462-6401

and

Danielle N. Rushing State Bar No. 24086961 drushing@dykema.com **DYKEMA GOSSETT PLLC** 112 East Pecan Street, Suite 1800 San Antonio, Texas 78205 Telephone: (210) 554-5500 Facsimile: (210) 226-8395

and

Rose L. Romero State Bar No. 17224700 Rose.Romero@RomeroKozub.com LAW OFFICES OF ROMERO | KOZUB 235 N.E. Loop 820, Suite 310 Hurst, Texas 76053 Telephone: (682) 267-1351

COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2022, the foregoing was served via this Court's CM/ECF.

/s/ Danielle N. Rushing Danielle N. Rushing