

LLC; Heartland Drilling Fund I, LP; Carson Oil Field Development Fund II, LP; Alternative Office Solutions, LLC; Arcooil Corp.; and Barron Petroleum LLC, by and through the Receiver in this matter, Deborah Williamson (“Receivership Entities” or “Defendants”), for preliminary injunctions against the Receivership Entities in the manner set forth as Exhibit 1 to this Motion. In support of its Motion, the SEC states as follows:

1. On December 2, 2021, this Court issued an Order for Temporary Restraining Order and Other Emergency Relief (ECF No. 12), Asset Freeze Order (ECF No. 14), and Order Appointing Receiver (ECF No. 17). The Court also scheduled a preliminary injunction hearing for December 14, 2021 at 9 a.m. in the Second Floor Courtroom of the United States District Court for the Northern District of Texas, Fort Worth Division. (ECF No. 12)

2. The SEC and the Receivership Entities have since agreed to preliminary injunctions in the form attached as Exhibit 1 to this Motion.

WHEREFORE, plaintiff United States Securities and Exchange Commission respectfully requests that the Court grant this motion; enter the preliminary injunctions in the form attached as Exhibit 1 to this Motion; and grant such other and further relief as this Court deems just and proper.

Dated: December 10, 2021

Respectfully submitted,

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION**

By: /s/ Jonathan S. Polish
Jonathan S. Polish

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Group Fund III, LLC; Heartland Drilling Fund I, LP; Carson Oil Field Development Fund II, LP; Alternative Office Solutions, LLC; Arcooil Corp.; and Barron Petroleum LLC, through the Receiver in this matter, Deborah Williamson (together the “Defendants” or “Receivership Entities”), for the Entry of An Agreed Preliminary Injunction Against the Receivership Entities following this Court’s entry of the following orders against or concerning Defendants: (a) Order for Temporary Restraining Order and Other Emergency Relief [ECF No. 12]; (b) Order Appointing Receivership [ECF No. 17]; and (c) Asset Freeze Order [ECF No. 14] (together the “Orders”), the Court orders as follows:

FINDINGS OF FACT

1. Defendants acknowledge having been served with the Orders, and having been properly served with the SEC’s Complaint in this matter.
2. Defendants agree to the issuance of a preliminary injunction in this matter in the form set forth below, which shall remain in full force and effect during the pendency of this litigation absent further order of this Court.

PRELIMINARY INJUNCTIONS

I. ORDER PRELIMINARILY ENJOINING DEFENDANTS FROM VIOLATING THE REGISTRATION PROVISIONS OF THE SECURITIES ACT OF 1933

Defendants 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.; and Barron Petroleum LLC, their agents, servants, employees, attorneys, entities under Defendants’ control, and those persons or entities in active concert or participation

with Defendants who receive actual notice of this Order, by personal service or otherwise, and each of them, are hereby restrained and enjoined from violating Sections 5(a) and 5(c) of the Securities Act [15 U.S.C. §§ 77e(a) and (c)] by, directly or indirectly, in the absence of any applicable exemption:

A. Unless a registration statement is in effect as to a security, making use of any means or instruments of transportation or communication in interstate commerce or of the mails to sell such security through the use or medium of any prospectus or otherwise;

B. Unless a registration statement is in effect as to a security, carrying or causing to be carried through the mails or in interstate commerce, by any means or instruments of transportation, any such security for the purpose of sale or for delivery after sale; or

C. Making use of any means or instruments of transportation or communication in interstate commerce or of the mails to offer to sell or offer to buy through the use or medium of any prospectus or otherwise any security, unless a registration statement has been filed with the SEC as to such security, or while the registration statement is the subject of a refusal order or stop order or (prior to the effective date of the registration statement) any public proceeding of examination under Section 8 of the Securities Act [15 U.S.C. § 77h].

II. ORDER PRELIMINARILY ENJOINING DEFENDANTS FROM VIOLATING SECTION 10(B) AND RULE 10B-5 OF THE SECURITIES EXCHANGE ACT OF 1934

Defendants 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.; and Barron Petroleum LLC, their agents, servants, employees, attorneys, and those persons in active concert or participation with Defendants who receive actual notice of this Order, by personal service or otherwise, and each of them, are hereby restrained and enjoined from, directly or indirectly, in violation of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5], and in connection with the purchase or sale of securities, by the use of any means or instrumentality of interstate commerce or of the mails, or of any facility of any national securities exchange:

- A. employing any device, scheme or artifice to defraud;
- B. making any untrue statement of material fact or omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- C. engaging in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

III. ORDER PRELIMINARILY ENJOINING DEFENDANTS FROM VIOLATING SECTION 17(a)(1), (2) and (3) OF THE SECURITIES ACT OF 1933

Defendants 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.; and Barron Petroleum LLC, their agents, servants, employees, attorneys, and those persons in active concert or participation with Defendants who receive actual notice of this Order, by personal service or otherwise, and each of them, are hereby restrained and enjoined from, directly or indirectly, in violation of Section 17(a) of the Securities Act [15

U.S.C. §§ 77q(a)(1), 77q(a)(2), and 77q(a)(3)], and in the offer and sale of securities, by the use of the means and instruments of transportation or communication in interstate commerce or by use of the mails, directly or indirectly, from:

- A. employing devices, schemes and artifices to defraud;
- B. obtaining money and property by means of untrue statements of material fact and by omitting to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading; or
- C. engaging in transactions, practices, and courses of business which operated or would operate as a fraud or deceit upon the purchasers of such securities.

IV. ORDER PRELIMINARILY ENJOINING DEFENDANTS FROM ENGAGING IN OFFERS OR SALES OF OIL AND GAS INVESTMENTS

Defendants 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.; and Barron Petroleum LLC, their officers, agents, servants, employees, attorneys, and all persons in active concert or participation with Defendants who receive actual notice of this Order by personal service or otherwise, are hereby restrained and enjoined from

directly or indirectly, including, but not limited to, through any entity owned or controlled by Defendants, participating in the issuance, purchase, offer, or sale of any security related to the production, exploration, extraction, purchase or sale of oil or gas.

SO ORDERED this ___ day of December, 2021

Reed O'Connor
UNITED STATES DISTRICT JUDGE

Acknowledged & Agreed To:

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION

By: /s/ Jonathan S. Polish
One of Its Attorneys


DEBORAH WILLIAMSON
Receiver

CERTIFICATE OF SERVICE

On December 10, 2021, I caused the foregoing filing to be transmitted to the following attorneys and *pro se* defendants by email and the email address reflected below.

/s/ Jonathan S. Polish

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