

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

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**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  
(AKA ROGER) SAHOTA; and RUSTIN  
BRUNSON,**

**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.,**

**Relief Defendants.**

**No. 4-21CV-1310-O-BP**

**NOTICE OF RECEIVER'S INTENT TO FORFEIT DISTRIBUTION**

**This Notice of Intent to Forfeit Distribution (the “Notice”) refers to the Receiver’s intent to forfeit the current distribution and all future distributions to certain allowed Claimants for failure to negotiate distribution check(s) within ninety (90) days from the date of the check.**

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the *Order Appointing Receiver* [ECF No. 17]) and receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case”), hereby files this Notice of forfeiture of the all current distribution **and** any future distributions to certain allowed Claimants for failure to negotiate the distribution check(s) within ninety (90) days as authorized by the *Order Granting Receiver, Deborah D. Williamson’s Motion for Order Approving Distribution Plan and Interim and/or Final Distribution* [ECF No. 560] (the “Order”).

On September 11, 2024, the Receiver made a distribution to four hundred fifty one (451) allowed Class 4a and 4b Claimants who provided a completed and signed W-9 (“September Distribution”). On December 13, 2024, nine (9) allowed Claimants received an email informing them of their failure to endorse the distribution checks by the ninety (90) day stale date and providing a December 17, 2024 deadline to cash their check. On December 30, 2024, two (2) allowed Claimants received an email informing them of their failure to endorse the distribution checks and providing a January 2, 2025 deadline to cash their check.

**On January 21, 2025, the Receiver will cancel all checks related to the two allowed Claimants with outstanding September Distributions, therefore forfeiting certain Claimants’ rights to all current and any future distributions.**

The Receiver reserves the right to postpone or withdraw the proposed intent to forfeit distribution for any reason that she deems to be in the best interest of the Receivership Estates.

To contact the Receiver's counsel regarding an Objection or for additional information related to this Notice, please contact Dominique Douglas at (210) 554-5204 or [heartlandreceivership@dykema.com](mailto:heartlandreceivership@dykema.com).

Dated: January 3, 2025

Respectfully submitted,

By: /s/ Dominique A. Douglas

Danielle R. Behrends  
State Bar No. 24086961  
drushing@dykema.com  
Dominique A. Douglas  
State Bar No., 21434409  
**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 January 3, 2025, the foregoing document was served via CM/ECF on all parties appearing in this case, including Securities and Exchange Commission, and via email on the following unrepresented parties on this Court's docket:

James Ikey  
Bridy Ikey  
[james.ikeyrcg@gmail.com](mailto:james.ikeyrcg@gmail.com)  
[bridydikey@gmail.com](mailto:bridydikey@gmail.com)

IGroup Enterprises LLC  
c/o James Ikey  
[james.ikeyrcg@gmail.com](mailto:james.ikeyrcg@gmail.com)

John Muratore  
[jmuratore6@gmail.com](mailto:jmuratore6@gmail.com)

Muratore Financial Services, Inc.  
c/o John Muratore  
[jmuratore6@gmail.com](mailto:jmuratore6@gmail.com)

Thomas Brad Pearsey  
[bradpearsey@aol.com](mailto:bradpearsey@aol.com)

Manjit Singh (aka Roger) Sahota  
Harprit Sahota  
Monrose Sahota  
[rogersahota207@gmail.com](mailto:rogersahota207@gmail.com)

Sunny Sahota  
[sunnysanangelo@gmail.com](mailto:sunnysanangelo@gmail.com)

I further certify that the foregoing Motion will be served via first-class U.S. mail and/or email, as applicable, upon the two (2) affected investors. I will file a supplemental certificate of service upon completion of service.

/s/ Dominique A. Douglas  
Dominique A. Douglas