

**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, §**

No. 4-21CV-1310-O

Defendants, §

and §

**DODSON PRAIRIE OIL & GAS LLC; PANTHER §
CITY ENERGY LLC; MURATORE FINANCIAL §
SERVICES, INC.; BRIDY IKEY; ENCYIPHER §
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. §

NOTICE OF INITIAL INVESTOR LETTER

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the Court’s December 3, 2021 *Order Appointing Receiver* [ECF No. 17]) and receivership estates (collectively, the “Estates”) in the above-captioned case (the “Case”), hereby files this *Notice of Initial Investor Letter* (the “Notice”).¹ The Receiver published correspondence (the “Initial Investor Letter”), dated December 10, 2021, to all known investors of the Receivership Parties via U.S. first-class mail on December 13, 2021. A true and correct copy of the Initial Investor Letter is attached to this Notice as **Exhibit A**. The Initial Investor Letter is also posted to the Receiver’s website at www.heartlandreceivership.com.

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

Dated: December 13, 2021

Respectfully submitted,

By: /s/ Deborah D. Williamson

Deborah D. Williamson

(Receiver)

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and

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COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2021, the foregoing motion and corresponding exhibits were served via CM/ECF and via email on counsel for Plaintiff Securities and Exchange Commission

/s/ Danielle N. Rushing
Danielle N. Rushing

EXHIBIT A



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Board Certified Business Bankruptcy

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December 10, 2021

Re: *Securities and Exchange Commission 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, United States District Court for the Northern District of Texas, Case No.: No. 4-21CV-1310-O*

Dear Investor:

On December 1, 2021, the Securities and Exchange Commission ("SEC") filed a Complaint alleging that the 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.; Barron Petroleum LLC; James Ikey; John Muratore; Thomas Brad Pearsey; Manjit Singh (aka Roger) Sahota; and Rustin Brunson ("Defendants"), were violating the federal securities laws by, among other things, engaging in materially false communications with investors which ultimately resulted in raising approximately \$122 million from more than 700 investors in the United States. On December 2, 2021, United States District Reed O'Connor entered a Temporary Restraining Order ("TRO") that, among other things, froze all the assets of the Defendants and prohibited them from transferring, setting off, receiving, changing, selling or liquidating any of the assets of the Defendants. On December 3, I was appointed the Receiver over the Defendants and their assets.

Judge O'Connor's order appointing me as Receiver provides, among other things:

I am entitled to possession of all property, including accounts and receivables, of the Defendants and may dispose of the same.

I am responsible for investigating the Defendants' business operations and the manner in which the Defendants conducted their business affairs.

I may prosecute any actions for the benefit of the Defendants' investors.

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I may defend, compromise, or settle any legal actions.

My immediate objective is to understand the assets, determine which assets have going-concern value, locate and preserve all of the Defendants' assets, with the ultimate goal of distributing value to all stakeholders. To assist me in my duties as the Court-appointed Receiver, I have employed my law firm, Dykema Gossett PLLC and Law Offices Of Romero | Kozub, as my legal counsel and may engage other professionals, including, without limitation, accountants, appraisers, information technology personnel, consultants, operators and auctioneers.

We are in the process of identifying and locating the Defendants' assets. If you have information that you think is helpful to us, please contact us by email to heartlandreceivership@dykema.com.

Also, I have set up a website located at www.heartlandreceivership.com to provide information about the case. Certain court documents are already posted on the website.

At this stage of my investigation, it is premature to recommend any action or resolution to Judge O'Connor. If sufficient assets exist, I will establish a claims process as part of the effort to return money to investors from the assets of the receivership, all as directed by Judge O'Connor.

I appreciate your cooperation and patience during the early stages of the receivership proceedings. My team is working diligently to secure assets and recover as much value as possible. A receiver acts as an agent of the court and cannot provide legal advice to you. I encourage you to monitor the receivership website. I will submit periodic reports that summarize the status of the receivership proceedings. These reports will be available on the website along with other pertinent information.

Sincerely,

DYKEMA GOSSETT PLLC

A handwritten signature in blue ink, appearing to read "Deborah D. Williamson", followed by a horizontal line.

Deborah D. Williamson