

**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 PROPOSED TERMINATION OF RECEIVERSHIP PARTY**

**This Notice of Proposed Termination of Receivership Parties (the “Notice”) refers to the termination of Panther City Energy, LLC, a Receivership Party (the “Termination”). If you oppose the termination of the Receivership Party detailed herein, you must file and serve a written objection to the Termination (“Objection”) (and detail any claim of ownership or interest in the Receivership Party). Such Objection must state why the Receivership Party should not be terminated and the basis for such belief. The Receiver may request an expedited hearing on any Objection. If no party or interested person files and serves a timely Objection, the Receiver may terminate the entity without further Order of the Court, thereby authorizing Termination.**

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 her intention to terminate Panther City Energy, LLC, a Receivership Party hereto pursuant to the Termination Procedures authorized by the *Order Approving Receiver’s Amended Motion to Approve Procedures for Termination Business Receivership Entities* [ECF No. 623] (the “Order”).

In the event that no objection or claim is filed within ten (10) business days of the date of this Notice, the Receiver has the authority, without further Order of the Court, to terminate the Receivership Party without further Order of the Court.

The Receiver reserves the right to postpone or withdraw the proposed Termination 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: December 12, 2024

Respectfully submitted,

By: /s/ Dominique A. Douglas

Danielle R. Behrends

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Dominique A. Douglas

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and

Rose L. Romero

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**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 December 12, 2024, the foregoing document was served via CM/ECF on all parties appearing in this case and via email on the following unrepresented parties on this Court's docket:

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/s/ Dominique A. Douglas  
Dominique A. Douglas