

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

UNITED STATES SECURITIES & EXCHANGE COMMISSION Plaintiff

v.

THE HEARTLAND GROUP VENTURES, LLC, ET AL. Defendant

§ § § § § § § § § §

Case No. 4-21CV-1310-O

APPLICATION FOR ADMISSION PRO HAC VICE (Complete all questions; indicate "N/A" if necessary.)

I. Applicant is an attorney and a member of the law firm of (or practices under the name of)

DARRELL R. JONES with LAW PRACTICE OF DARRELL R. JONES, PLLC, with offices at

5300 MEMORIAL DRIVE, SUITE 475 (Street Address)

HOUSTON TEXAS 77007 (City) (State) (Zip Code)

(832) 302-5373 N/A (Telephone No.) (Fax No.)

II. Applicant will sign all filings with the name DARRELL R. JONES.

III. Applicant has been retained personally or as a member of the above-named firm by:

(List All Parties Represented)

DEBORAH D. WILLIAMSON, COURT-APPOINTED RECEIVER IN THE ABOVE-CAPTIONED CASE

to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the Northern District of Texas.

IV. Applicant is a member in good standing of the bar of the highest court of the state of  
\_\_\_\_\_ TEXAS \_\_\_\_\_, where Applicant regularly practices law.

Bar license number: 24029642 Admission date: 5/2/2001

For Court Use Only.  
Bar Status Verified:

**Attach to this application an original certificate of good standing issued within the past 90 days from the attorney licensing authority in a state in which you are admitted to practice (e.g., State Bar of Texas).**

V. Applicant has also been admitted to practice before the following courts:

Court:	Admission Date:	Active or Inactive:
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

VI. Applicant has never involuntarily lost, temporarily or permanently, the right to practice before any court or tribunal, or resigned in lieu of discipline, except as provided below:

VII. Applicant has never been subject to grievance proceedings or involuntary removal proceedings—regardless of outcome—while a member of the bar of any state or federal court or tribunal that requires admission to practice, except as provided below:

VIII. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

**IX.** Applicant has filed for *pro hac vice* admission in the United States District Court for the Northern District of Texas during the past three (3) years in the following matters:

Date of Application:	Case No. And Style:
_____	_____
_____	_____
_____	_____

(If necessary, attach statement of additional applications.)

**X.** Local counsel of record associated with Applicant in this matter is

ROSE L. ROMERO with LAW OFFICES OF ROMERO | KOZUB, who has offices at

\_\_\_\_\_  
(Street Address)

HURST  
(City)

TEXAS  
(State)

\_\_\_\_\_  
(Zip Code)

(817) 616-3067  
(Telephone No.)

N/A  
(Facsimile No.)

**XI.** Check the appropriate box below.

For Application in a **Civil Case**

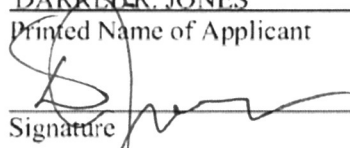
Applicant has read *Dondi Properties Corp. v. Commerce Savs. & Loan Ass'n*, 121 F.R.D.284 (N.D. Tex. 1988) (en banc), and the local civil rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil rules.

For Application in a **Criminal Case**

Applicant has read and will comply with the local criminal rules of this court.

**XII.** Applicant respectfully requests to be admitted to practice in the United States District Court for the Northern District of Texas for this cause only. Applicant certifies that a true and correct copy of this document has been served upon each attorney of record and the original upon the clerk of court, accompanied by a \$100 filing fee, on this the 14th day of DECEMBER, 2021.

DARRYL R. JONES  
Printed Name of Applicant

  
Signature

If the applicant files this document through the applicant's electronic-filing account, the applicant's typed name on the signature block constitutes the applicant's signature. If the applicant does not file this document through the applicant's electronic-filing account, the applicant must sign on the signature line.

# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

December 10, 2021

Re: Mr. Darrell Roy Jones, State Bar Number 24029642

To Whom It May Concern:

This is to certify that Mr. Darrell Roy Jones was licensed to practice law in Texas on May 02, 2001, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

A handwritten signature in black ink, appearing to read "Seana Willing".

Seana Willing  
Chief Disciplinary Counsel  
SW/web





**Dykema Gossett PLLC**  
Weston Centre  
112 E. Pecan Street, Suite 1800  
San Antonio, TX 78205  
WWW.DYKEMA.COM  
Tel: (210) 554-5500  
Fax: (210) 226-8395

**Deborah D. Williamson**  
Board Certified Business Bankruptcy  
Direct Dial: (210) 554-5275  
Direct Fax: (866) 850-9085  
Email: DWilliamson@dykema.com

December 14, 2021

**VIA FEDEX**

Clerk's Office  
United States District Court for the  
Northern District of Texas  
1100 Commerce Street, Room 1452  
Dallas, TX 75242

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. 4-21CV-1310-O*

Dear Clerk:

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 Judge 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, 2021, I was appointed the Receiver over the Defendants and their assets.



DyKEMA

December 14, 2021

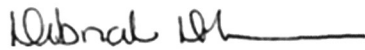
Page 2

On December 7, 2021, my firm filed the *Application to Employ Law Practice of Darrell R. Jones, PLLC as Counsel to Receiver Effective as of December [3], 2021* (the “DRJ Application”) under seal. On December 9, 2021, my firm filed the *Supplemental Reply in Support* [ECF No. 31] of the DRJ Application. Enclosed, please find (1) Darrell R. Jones’s application for admission *pro hac vice*, (2) the corresponding filing fee via firm check, and (3) Darrell R. Jones’s certificate of good standing from the State Bar of Texas, dated December 10, 2021.

Please do not hesitate to contact me with any questions.

Sincerely,

**DYKEMA GOSSETT PLLC**



Deborah D. Williamson

Enclosures