

**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; 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.

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

**NOTICE OF RECEIVER’S RECOGNITION IN
THE COMMONWEALTH OF THE BAHAMAS**

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 Receiver’s Recognition in The Commonwealth of The Bahamas* (the “Notice”).

On April 22, 2025, the Receiver, through Higgs & Johnson as Court-approved Bahamian counsel, filed her *Petition* in the Supreme Court of The Bahamas, requesting recognition as “receiver” in The Commonwealth of The Bahamas over Receivership Parties Arcooil Corp. and Barron Petroleum LLC, pursuant to Part VII(A) of the Companies Act, Chapter 308 of the Revised Laws of The Commonwealth of The Bahamas.

Her Ladyship the Honourable Madam Justice Camille Darville-Gomez considered the Receiver’s *Petition* and supporting affidavits at a hearing held on June 10, 2025.

On June 12, 2025, Justice Gomez entered a *Declaratory Order*, recognizing the Receiver as the “Foreign Representative” over Receivership Parties Arcooil Corp. and Barron Petroleum LLC in The Commonwealth of The Bahamas. The Receiver, or her designee, is recognized as “the only person(s) entitled to act in The Commonwealth of The Bahamas on behalf of and/or in the name of the Receivership Parties.” *Declaratory Order*, ¶ 2.

A true and correct copy of the *Declaratory Order* is attached to this Notice as **Exhibit A**.

Dated: June 12, 2025

Respectfully submitted,

By: /s/ Danielle Rushing Behrends

Danielle R. Behrends

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COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2025, the foregoing document was served via CM/ECF on all parties appearing in this case, including counsel for Plaintiff, United States Securities and Exchange Commission, and on the following via first-class U.S. mail:

James Ikey
103 Bayonne Drive
Mansfield, TX 76063

Muratore Financial Services, Inc.
10211 Meredith Drive
Huntington Beach, CA 92646

Bridy Ikey
103 Bayonne Drive
Mansfield, TX 76063

Thomas Brad Pearsey
13001 Moultrie Street
Carmel, IN 46032

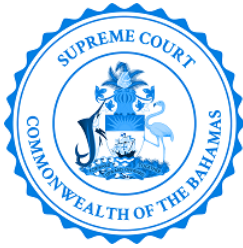
IGroup Enterprises LLC
c/o James Ikey
103 Bayonne Drive
Mansfield, TX 76063

Manjit Singh (aka Roger) Sahota
Harprit Sahota
Monrose Sahota
Sunny Sahota
3371 Knickerbocker Road
Unit #185
San Angelo, TX 76904

John Muratore
10211 Meredith Drive
Huntington Beach, CA 92646

/s/ Danielle Rushing Behrends
Danielle Rushing Behrends

EXHIBIT A



In the Commonwealth of The Bahamas

In the Supreme Court

Common Law and Equity Division

Claim No: 2025/COM/com/00015

IN THE MATTER of Part VII(A) of the Companies Act, Chapter 308 of the Revised Laws of the Commonwealth of The Bahamas

AND IN THE MATTER OF Arcooil Corp

AND IN THE MATTER OF Barron Petroleum LLC

DECLATORY ORDER

Before Her Ladyship the Honourable Madam Justice Camille Darville-Gomez

Dated the 10th day of June A.D., 2025

UPON this matter being called for a hearing of the petition on 10th day of June A.D., 2025

AND UPON READING (i) the Petition filed on 22nd day of April A.D., 2025, (ii) the Certificate of Urgency filed on 28th day of April A.D., 2025, (iii) the Affidavit of Foreign Law of Danielle Rushing Behrends filed on 2nd day of June A.D., 2025, (iv) the Verifying Affidavit of Deborah D. Williamson filed on 2nd day of June A.D., 2025, and (v) The submissions in support of the petition of Deborah D. Williamson for Recognition as Receiver in The Bahamas filed on the 28th Day of May 2025.

AND UPON HEARING Mrs. Tara A. Archer-Glasgow and with her, Mr. Nicholas Pennerman, Counsel for the Petitioner.

IT IS HEREBY ORDERED AND DECLARED that:

1. Ms. Deborah D. Williamson, in her capacity as Receiver over Arcooil Corp and Barron Petroleum LLC (together, the "Receivership Parties") pursuant to the United States District Court for the Northern District of Texas, Fort Worth Division in case 4:21-cv-0131-O-BP (The "Foreign Representative"), is hereby recognised by this Honourable Court as the Foreign Representative of the Receivership Parties.
2. The Foreign Representative or her designee, is hereby recognised as the only person(s) entitled to act in The Commonwealth of The Bahamas on behalf of and/or in the name of the Receivership Parties.

IT IS ALSO HEREBY ORDERED THAT:

3. The Foreign Representative shall be at liberty to exercise within The Bahamas, to the extent permitted by Bahamian law, all powers and duties granted to her under the said United States Receivership Order.
4. The Foreign Representative shall be at liberty to apply for such further or other Orders or Directions from this Honourable Court as may be just and necessary in the circumstances; and
5. The costs of and occasioned by this application shall be costs in the United States Receivership.

Date: 11th June, 2025 Signature of Judge or Registrar: [Signature]

BY ORDER OF THE COURT

REGISTRAR

This Order was drawn up by Messrs. Higgs & Johnson, Ocean Centre, Montagu Foreshore, Nassau, Bahamas Attorneys for the Petitioner

In the Commonwealth of The Bahamas

In the Supreme Court

Common Law and Equity Division

Claim No: 2025/COM/com/00015

IN THE MATTER of Part VII(A) of the Companies Act, Chapter 308 of the Revised Laws
of the Commonwealth of The Bahamas

AND IN THE MATTER OF ArcoOil Corp

AND IN THE MATTER OF Barron Petroleum LLC

DECLATORY ORDER

Petitioner's Address for Service: **TARA A. ARCHER-GLASGOW**

Advocate Counsel & Attorney-at-Law for the Claimant

HIGGS & JOHNSON

Ocean Centre, Montagu Foreshore

East Bay Street, Nassau, N.P. Bahamas

Tel: 242 502 5200

FAX: 242 502 5250

e-mail: tarcher@higgsjohnson.com

Filed on behalf of:

Deborah D. Williamson, Receiver

San Antonio, Texas, USA