

RECEIVER'S NOTICE OF DISBURSEMENT ON APRIL 7, 2025

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 distribution on December 27, 2024 pursuant to the *Order Granting Receiver, Deborah D. Williamson's Motion for Order Approving Distribution Plan and Interim and/or Final Distribution by the Court's July 1, 2024* [ECF No. 560] and *Order Granting Receiver's Motion (I) to Approve Proposed Settlement with Former Counsel to Certain Heartland-Related Receivership Parties, (II) to Enter a Bar Order, and (III) to Approve Payment of Fees and Expenses of Reid Collins & TSAI LLP, Litigation Counsel to Receiver* [ECF No. 536]. Specifically,

(a) *pro rata* share of \$5,000,000.00 to Allowed Class 4a and 4b Claimants who provided a completed and signed W-9 on or before August 29, 2024;

(b) *pro rata* share of \$9,375,000 in Net Settlement Proceeds to Allowed Class 4a Claimants who provided a completed and signed W-9 on or before August 29, 2024.

On September 11, 2024, the Receiver made a distribution to Allowed Class 4a and 4b Claimants who provided a completed and signed W-9 on or before August 29, 2024 (the "September Distribution").¹ On October 17, 2024, the Receiver made a distribution to Allowed Class 4a and 4b Claimants who provided a completed and signed W-9 on or before October 14, 2024 (the "October Distribution").² On December 27, 2024, the Receiver made a distribution to Allowed Class 4a and 4b Claimants who provided a completed and signed W-9 on or before

¹ See ECF No. 587.

² See ECF No. 604.

December 20, 2024 (the “December Distribution”).³ On April 7, 2025, a distribution was made to Allowed Class 4a and 4b Claimants who did not receive a distribution in September, October, or December and whose completed and signed W-9 was received on or before February 15, 2025. Claimants who received the April Distribution did not receive a distribution in September, October, or December.

Dated: April 14, 2025

Respectfully submitted,

By: /s/ Dominique A. Douglas

Danielle R. Behrends

State Bar No.24086961

dbehrends@dykema.com

Dominique A. Douglas

State Bar No.21434409

ddouglas@dykema.com

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

³ See ECF No. 643.

CERTIFICATE OF SERVICE

I hereby certify that on December April 14, 2025, the foregoing document was served via CM/ECF on all parties appearing in this case, including counsel for Plaintiff Securities and Exchange Commission, and on the following via first-class U.S. mail:

James Ikey
103 Bayonne Drive
Mansfield, TX 76063

Bridy Ikey
103 Bayonne Drive
Mansfield, TX 76063

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

John Muratore
10211 Meredith Drive
Huntington Beach, CA 92646

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

Thomas Brad Pearsey
13001 Moultrie Street
Carmel, IN 46032

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

/s/ Dominique A. Douglas
Dominique A. Douglas

