



**NOTICE OF PROPOSED SALE OF REAL PROPERTY**

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) in the above-captioned case (the “Case”), hereby files and publishes this *Notice of Proposed Sale of Real Property* (the “Notice”) of her intention to sell the real property (the “Property”) identified on **Exhibit A** hereto pursuant to the procedures authorized by the Court’s July 15, 2022 *Order* [ECF No. 240] (the “Order”).<sup>1</sup>

In accordance with the Order, the Receiver retained Western Appraisal, LLC and Bierschwale Land Company, LLC as non-residential appraisers. She also engaged a broker in connection with the listing and sale of the Property. On August 1, 2023, the Receiver accepted an offer for the Property at a proposed sale price of \$65,000.00.

**Pursuant to the Order, any third party may make a subsequent offer of at least ten (10%) percent more than the proposed sale price of \$65,000.00 (the “Cash Offer”) under similar terms and conditions of sale. The Cash Offer is not subject to financing or other third party approval. Any competing offer must be submitted in writing to counsel for the Receiver at [dbehrends@dykema.com](mailto:dbehrends@dykema.com) by no later than August 15, 2023, which is ten (10) business days from the filing of this Notice (a “Higher Offer”).**

**If one or more Higher Offers are received, the Receiver will provide a limited opportunity for additional offers to be submitted.**

To contact the Receiver’s counsel for additional information related to this Notice, please contact Danielle Rushing Behrends at (210) 554-5528 or [dbehrends@dykema.com](mailto:dbehrends@dykema.com).

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Order.

Dated: August 1, 2023

Respectfully submitted,

By: /s/ Danielle Rushing Behrends

Danielle Rushing Behrends

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**COUNSEL TO RECEIVER**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2023, the foregoing document was served via CM/ECF on all parties appearing in this case, including counsel for Plaintiff Securities and Exchange Commission; served via email as detailed below; and posted on the Receivership website at [www.heartlandreceivership.com/notices](http://www.heartlandreceivership.com/notices). Other parties submitting offers for the purchase of the Property, if any, will be emailed a copy of the foregoing document and will not be included herein for privacy reasons. The Property broker will also provide a copy of the foregoing document to other potentially interested parties.

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*/s/ Danielle Rushing Behrends*  
Danielle Rushing Behrends

**Exhibit A**  
**Legal Description**  
**Electra - Wichita County**

4.10 ACRES TRACT OF LAND CONVEYED TO TOMMY SWANSON BY DEED RECORDED IN VOLUME 2049, PAGE 157, OFFICIAL PUBLIC RECORDS OF WICHITA COUNTY, SAID SWANSON TRACT BEING OUT OF SECTION 148, BLOCK 14, H & T.C. RR. COMPANY SURVEY, A-784, WICHITA COUNTY, TEXAS, AND MORE PARTICULARLY DESCRIBED BY METES AND BOUNDS AS FOLLOWS:

BEGINNING at an iron rod set in the South right-of-way line of F.M. Highway 1811 at the North corner of said Swanson tract, and of this tract;

THENCE S 54° 39' 22" E with the Northeast line of said Swanson tract a distance of 189.93 feet to an iron rod set in the West right-of-way of State Highway 25 at the Northeast corner of said Swanson tract, and of this tract;

THENCE S 05° 06' 44" E with the West right-of-way line of State Highway 25 and the East line of said Swanson tract at 378.3 feet pass a fence line and continuing on the same course a total distance of 400.00 feet to an iron rod set at the Southeast corner of said Swanson tract and at the Northeast corner of a tract of land conveyed to Waggoner WT Estate Inc. by deed recorded in Document# 2016-2041, Official Public Records Wichita County, for the Southeast corner of this tract;

THENCE S 84° 53' 42" W with the South line of said Swanson tract a distance of 200.00 feet to an iron rod found at the most Southerly Southwest corner of said Swanson tract and at the Southeast corner of a tract of land conveyed to Slant Operating L.L.C. by deed recorded in Document# 2018-5024, Official Public Records Wichita County, for the most Southerly Southwest corner of this tract;

THENCE N 05° 07' 11" W with the East line of said Slant Operating L.L.C. tract at 3.5 feet pass a fence line and at 141.8 feet pass a fence line and continuing on the same course, generally with a fence, a total distance of 156.25 feet to an iron rod found, at an angle corner of said Swanson tract the most Easterly Northeast corner of said Slant Operating L.L.C tract, for an angle corner of this tract;

THENCE N 55° 00' 33" W with the Northeast line of said Slant Operating L.L.C. tract and the Southwest line of said Swanson tract a distance of 127.45 feet to an iron rod found at an angle corner of said Swanson tract and an angle corner of said Slant Operating L.L.C. tract, for an angle corner of this tract;

THENCE S 74° 06' 34" W distance of 186.22 feet to an iron rod found at the most Westerly Southwest corner of said Swanson tract and at an ell corner of said Slant Operating L.L.C. tract, for the most Westerly Southwest corner of this tract;

THENCE N 15° 56' 25" W with the East line of said Slant Operating L.L.C tract, and the West line of said Swanson tract a distance of 249.95 feet to an iron rod found at the Northwest corner of said Swanson tract and the most Northerly Northeast corner of said Slant Operating L.L.C. tract, for the Northwest corner of this tract;

THENCE N 73° 55' 19" E with the South right-of-way of F.M. Highway 1881 and the North line of said Swanson tract, at 365.3 feet pass a fence line and continuing on the same course a total distance of 390.00 feet to the PLACE of BEGINNING and containing 4.10 acres of land.