## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

UNITED STATES SECURITIES	§	
AND EXCHANGE COMMISSION,	§	
,	§	
Plaintiff,	§	
,	§	
<b>v.</b>	§	
	§	
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	§	No. 4-21CV-1310-O-BP
(AKA ROGER) SAHOTA; and RUSTIN	§	
BRUNSON,	§	
	§	
Defendants,	§	
	§	
	§	
and	§	
	_	
	§	
DODSON PRAIRIE OIL & GAS LLC; PANTHER		
DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL	§	
•	§ §	
CITY ENERGY LLC; MURATORE FINANCIAL	§ § §	
CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER	80 80 80 W	
CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC;		
CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA;	8 8 8 8 8 8	
CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY	<i>\omega</i> \omega	
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.;	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
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	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
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	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
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.,	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	

# RECEIVER'S NOTICE OF INTENT TO MAKE DISTRIBUTIONS ON SEPTEMBER 11, 2024

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 make the following distributions on September 11, 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]:* 

- (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; and
  - (c) pro rata distribution of \$650,000 to Allowed Class 5 Claimants.

To the extent additional completed and signed W-9 forms are received from holders of Allowed Claims in Class 4a and 4b, one or more subsequent distributions will be made.

Dated: September 5, 2024 Respectfully submitted,

### By: /s/ Danielle Rushing Behrends

Danielle Rushing Behrends State Bar No. 24086961 dbehrends@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** 

#### **CERTIFICATE OF SERVICE**

I hereby certify that on September 5, 2024, 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/ Danielle Rushing Behrends
Danielle Rushing Behrends