

NOTICE OF PROPOSED PRIVATE SALE OF PERSONAL PROPERTY

This Notice of Proposed Private Sale of Personal Property (the “Notice”) relates to the private sale of certain categories and/or items of personal property (the “Property”) of the Receivership Estates. If you oppose the private sale of the Property identified in this Notice, or if you have a claim to or against the Property, you should immediately contact the undersigned counsel for Receiver Deborah D. Williamson (the “Receiver”). If you and the Receiver cannot agree, you must file a written objection (or a claim of ownership or interest in the Property, identifying the source of your claim) to the proposed sale by December 23, 2022, which is seven (7) days after the date this Notice was filed with the Court. Your objection or claim must state why the proposed sale should not be approved by the Court as to specific pieces of Property. Any objections must be filed:

**United States District Court for the Northern District of Texas,
Fort Worth Division
Clerk of Court
501 West 10th Street, Room 310
Fort Worth, Texas 76102**

If no party files a timely objection and no competing offers are submitted, the Receiver will be authorized to close on the sale of the 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 her intention to sell the personal property (the “Property”) identified on **Exhibit A** hereto pursuant to the procedures authorized by the Court’s June 9, 2022 *Order* (the “Order”) [ECF No. 217].

Pursuant to the Order, any third party may make a subsequent offer of at least ten (10%) percent more than the proposed sale price listed in Exhibit A under similar terms and conditions of sale. Any competing offer must be submitted in writing to counsel for the Receiver at drushing@dykema.com by no later than December 23, 2022, which is seven (7) 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.

In the event that (i) no timely objection or claim is filed and (ii) no timely Higher Offers are received, the Receiver has the authority, without further Order of the Court, to close on the sale of the Property and transfer possession and ownership pursuant to the sale terms.

The Receiver reserves the right to postpone or terminate the proposed sale of the Property for any reason that she deems to be in the best interests of the receivership estates.

To contact the Receiver's counsel regarding an objection or for additional information related to this Notice, please contact Danielle N. Rushing at (210) 554-5500 or drushing@dykema.com.

Dated: December 16, 2022

Respectfully submitted,

By: /s/ Danielle N. Rushing
Danielle N. Rushing
State Bar No. 24086961
drushing@dykema.com
DYKEMA GOSSETT PLLC
112 East Pecan Street, Suite 1800
San Antonio, Texas 78205
Telephone: (210) 554-5500
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and

Rose L. Romero
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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 December 16, 2022, 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 first-class mail at the addresses provided below; and posted on the Receivership website at www.heartlandreceivership.com/notices.

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
c/o Theodore Grannatt
McCarter & English, LLP
265 Franklin Street
Boston, MA 02110

Muratore Financial Services, Inc.
c/o Theodore Grannatt
McCarter & English, LLP
265 Franklin Street
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Thomas Brad Pearsey
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David Childress
Shannon, Martin, Finkelstein, Alvarado
& Dunne PC
1001 McKinney, Suite 1100
Houston, Texas 77002

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

/s/ Danielle N. Rushing
Danielle N. Rushing

EXHIBIT A

Asset Category	Description	Proposed Sale Price
Lot 1222	(9636) 2014 FORD, VIN: 1FT7X2B69EEA98009, W/TOOLBOX ON BED	\$1,000.00
Lot 1229	(9357) 2012 CHEVY 2500 4X4 S/A, V8, AUTO TRANS., VIN- 1GC1KVCGXCF238122, W/ FUEL TANK IN BED	\$3,500.00

The Receiver may accept funds for the sale of the Property in the manner of ACH/wire, money order, or business check, and payment shall be remitted to the Receiver’s counsel at the address in the Notice. The Receiver will consummate the sale of the Property as expeditiously as practicable and in accordance with the Court’s June 9, 2022 *Order* [ECF No. 217].