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	§	No. 4-21CV-1310-O-BP
(AKA ROGER) SAHOTA; and RUSTIN	§	
BRUNSON,	§	
	§	
Defendants,	§	
	§	
	§	
and	§	
	§	
DODSON PRAIRIE OIL & GAS LLC; PANTHER	§	
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.,	§	
	§	
Relief Defendants.	§	
	§	

NOTICE OF PROPOSED SALE OF REAL PROPERTY

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

In accordance with the Order, the Receiver retained Western Appraisal, LLC and Bierschwale Land Company, LLC as non-residential appraisers. She is also in possession of the tax appraised value. She also engaged a broker in connection with the listing and sale of the Property. On October 26, 2023, the Receiver accepted an offer for the Property at a proposed sale price of \$1,325,000.00, which is approximately 90% of the average of the three appraised values of the Property.

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 \$1,325,000.00 (the "<u>Cash Offer</u>") under similar terms and conditions of sale. The Cash Offer cannot be subject to financing or other third party approval. Any competing offer must be submitted in writing to counsel for the Receiver at <u>dbehrends@dykema.com</u> by no later than <u>November 13, 2023</u>, which is ten (10) business days² from the filing of this Notice (a "<u>Higher Offer</u>").

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

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

² Friday, November 10, 2023, is a federally-observed holiday; thus, the deadline falls to Monday, November 13, 2023.

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.

Dated: October 27, 2023

Respectfully submitted,

By: <u>/s/ Danielle Rushing Behrends</u> 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 October 27, 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 <u>www.heartlandreceivership.com/notices</u>. 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.

James Ikey james.ikeyrcg@gmail.com

Bridy Ikey bridydikey@gmail.com

John Muratore jmuratore6@gmail.com

Muratore Financial Services, Inc. c/o John Muratore jmuratore6@gmail.com

Thomas Brad Pearsey bradpearsey@aol.com

Manjit Singh (aka Roger) Sahota Harprit Sahota Monrose Sahota <u>rogersahota207@gmail.com</u>

Sunny Sahota sunnysanangelo@gmail.com

> <u>/s/ Danielle Rushing Behrends</u> Danielle Rushing Behrends

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EXHIBIT A

SCHEDULE "A"

LEGAL DESCRIPTION

Property (Including Any Improvements):

TRACT ONE: 614.313 acres of land, more or less, out of Survey two (2), block two (2), Abstract Number One Thousand, Two Hundred Forty-Five (1245), G.C. & S.F. RR.. Co., Schleicher County, Texas and also being out of and a part of that same land described in a deed from Blaylock to Hardy and recorded in Volume 351, Page 426, Official Public Records of Schleicher County, Texas, said 614.313 acres of land being more particularly described by metes and bounds in Exhibit "A," attached hereto and incorporated herein as if fully set forth at length.

TRACT TWO: That certain road easement from Brett A. Nikolauk to Frankie Blaylock Hardy, et al, being a thirty foot (30.00') wide road easement over and across a portion of Survey Six (6), Block A-2, Abstract Number One Thousand, Two Hundred, Forty-Four (1244), G.C. & S.F. RR. Co., Schleicher County, Texas, said road casement being more particularly described by metes and bounds in Exhibit "B," attached hereto and incorporated herein as if fully set forth at length.

TRACT THREE: That certain road casement from John Ford Oglesby, Jr., to Frankie Blaylock Hardy, et al, being a thirty foot (30.00') wide road casement over and across a portion of Survey Five (5), Block A-2, Abstract Number Forty-Three (43), Schleicher County, Texas, said road casement being more particularly described by metes and bounds in Exhibit "C," attached hereto and incorporated herein as if fully set forth at length.

614.313 acres of land out of Survey 2, Block 2, Abstract No. 1245, G, C, & S. P. RR: Co., Schleicher-County, Texas, and also being out of and a part of that same land described in a doed from Blaylock to Hardy and reported in Volume 351, Page 426, Official Public Records of Real Property of Bohloichar County, Texas, said 614.313. acres of land beling more particularly desoribed by merestand bounds as follows 12.18 1 :: " ..

BEGINNING at a fence corner post found for the southeast corner of this track, the southeast corner of said Survey 2, the southwest corner of Survey 3, the northwest corner of Survey 8, and the northeast corner of Survey 9, all in Block 2; G. C. & S. F. RR. Co., Schleicher County, Texas, from whence an old stone mound with a file in the center found for the southeast comer of said Survey 3, and the said nonheast corner of said Survey 8 boars M 89º 53 33' E 5487 78 feet,

..... 1.4 THENCES 89" 49" 20" W 5443.8F along the south line of this tract, the south line of said Survey 2, the north line of said Survey 9; and generally along an existing fence line to a fence comer post found for the southwest corner of this tract; the southwest corner of said Survey 2, the porthwest corner of said Survey 9, the northeast corner of Survey 10, and the southeast corner of Survey 1, all in Block 2, G.C. & S. F. RR: Co., Schleicher County, Texas;

THENCE N 0º 09' 38" E 3714.15 fest along the west line of this tract, the west line of said Survey.2,. and the cast line of said Survey 1 to a point in the south line of a 97.904 acre tract out of said Survey I and said Survey 2 for the northwest corner of this treet, said point being the southwest corner of a 70.669 acte tract being that portion of said 97.904 acre tract lying in said Survey 2; said 97/904 acre tract being previously described in general terms as "70.8" acres in a deed from Blaylock to Nikolauk and recorded in Volume 165, Page 395, Deed Records, Schleicher County, Texas - :

THENCE along the north line of this tract, the south line of said 97, 204 acre, tract, and generally along 1.0 an existing fence line as follows

. . 1

N 55° 54' 28" B 351.40 feet to s.fonce corner post;

N 84º 59'27" E 155,57 fest to a fence comer post

N 73.º. 06' 19". B 72.13 feet to a fence corner post

N 7º 35' 39" W.106 12 fact to a fonce comer post; "

N 55º 58' 48" B 2036.86 feet to a fence comer post

N 87º 26' 51" B 1818,45 feet to a fence comer postr

N 87º 32' 01" E 1178.39 Sectio a fence comer post;

.....

. N 88° 04' 17" E 243.52 feet to a point in the east line of said Survey 2 and in the west line of said Survey 3 for the northeast compr of this tract and the southeast corner of said 97.904 sore tract from whence a fence corner post bears N 88° 04' 17" E 5.34 feet and a found scattered stone mound for the northeast corner of said Survey 2 and the northwest corner of said Survey 3, Block 2, Bears N 0° 04' 25" W 164.86 fact, and from said stone mound a fence corner post bears N 56º 53' 52" E 8.86 feet;

THENCES 0" 04' 25" E 53 13.44 feet along the cast line of this traot, the cast line of said, Survey 2, the west line of said Survey 3, and generally along an existing fence line to the place of beginning and. . Sugar containing 614.313 acres of land.

Page 1 of 2 A thirty feet. (30,00') wide road casement over and soross a portion of Survey 6, Block A-2. Abstract No. 1244, G. C. & S. F. RR. Co., Schleicher County, Toxas, said road-easement being .-more particularly defined as being fifteen feet (15.00!) on each side of the following described. centerline: ····· BEGINNING an a point in the west line of Survey 5, Block A.2, Abstract No. 43, Schleicher Ja-County, Texas, and the cast line of said Surveys Hom whence a point for the northeast comer of Survey 3, Blook 2, Abstract No. 125, G. C. 2.S. P. RR. Co., Schleichef County, Texas, bears S 88' 25' 06" W 1152:55 fest and a found 1/1-4" iron pipe for the goutheast comer of said Survey.6 and the southwest corner of said Survey 5.bears S.O. 16' 34" E 32:35 fast. And the second THENCE along the conterline of said thirty feet (30.00) road easement as follows: \$ 897 38' 54" W 438.62 Bet to a point of angle; N'89' 42' 309 W 282,39 feet to a point of angle;. N 89' 35' 19" W.275,83' feat to a point of angle; N 89' 19' 09" W 364'92' feet to a point of angle; S 88" 15" 43" W 285:25 feet to a point of angle 89" 41 15" W 343.37 feet to a point of angle; \$ 89" 16 00" W 590 26 Point of angle; S 89" 36 09" W 529.26 feet to a point of angle; N 89" 55' 01" W 351.05 fast to a point of angle; S 89" 45' 17" W 269.03 feet to a point of angle; ." S 89" 27' 00" W 284.25 feet to a point of angle; S 89" 59' 36" W 326.85 fast to a point of angle;-N 88" 34' 56" W 391.05 feet to a point of angle; S 89' 32' 20" W 135:45 feet to E point of angle; \$ 78: 21' 18" W. 79.73 feet to a point of angle; S 50° 30° 10° W 22.33 feet to a point in the south line of said Survey 6 and the north line . of Survey 2, Block 2, Abstract No. 1245, G.C. & S. P. RR. Co., Schlaidher County, Texas for the end of this casement, said and point also being in the north line offa, 97,904 acre trast out of. Survey 1, Block 2, G.C. & S. F. RR. Co., Schleicher County, Texas, and but of said Survey 2, sid and point of the casement being in the north line offa, 97,904 acre trast out of. said and point of this easoment being in the porth line of a 70,669; sore tract being that portion of ... and 97,904 acre tract lying in said Survey 2, said 97,904 adra tract being previously described in ... general terms as: "70.8" apres in a deed from Blaylook to Mikolauk and redorded in: Volume 165, Page 195, Daed Records, Schleicher County, Tekas, from whence a found spittered stone mound: for the northeast corner of said Survey 2 and the northwest corner of Survey.3, Block 2, Abstract No. 125; G: C: & S. F. R.R. Co., Schleicher County, Texas, bears S 89" 52".47" B 34:66 feet, . . Surveyed on the ground under my supervision according to the Minimum Standard's of the Professional Land Surveying Practices Act and General Rules of Propedures and Practices set forth by the Texas Board of Professional Land Surveying. G/Sudduth Registered Professional Land Surveyor No. 2928 July 25, 2011 (Revised Soptember 19; 2011) ,

2 of 2 A thirty feet (30.00') wide road casement over and across a portion of a 70.669 acre tract out of Survey 2, Block 2; Abstract No. 1245, G. C. & S. F. RR. Co., Schleicher County, Texas, and also being over and across a portion of a 97,904 acre tract out of Survey 1, Block 2, Abstract No. 124, O. C. & S. F. RR. Co., Schleicher County, Texas, and said Survey 2, said 70.669 acre tract being that portion of said 97.904 sore tract lying in said Survey 2, said 97,904 sore tract being previously described in general terms as "70.8" sores in a deed from Blaytock to Nikolauk and recorded in Volume : 155, Page 395, Deed Records, Sohleicher, County, Texas, said road casements boing more particularly defined as being fifteen feet (15:00), on each side of the following described centerline: BEOINMING at a point in the south line of Survey 6, Block A-2. Abstract No 1244, Schlolohor County, Texas, in the north-line of said Survey 2, and in the north line of said 70;669 apre-tractout of Survey 2 from whence a scattered stone mound found for the northeast corner of said Survey 2 and the northwest corner of Survey 3; Block 2, Abstract No. 125, G. C. & S. F. R.R. Co., Schleicher County, Texas bears S:89" 52" 47" B 34.66 feet and a fence comes post floand for. the northwest corner of said Survey 2 bears N 89: 32:47" W S385:66 feat; THENCE slong the centerline of soid thirty fast (30.00') wide road casement as follows: S 50' 30' 10" W BB.24 feet to a point of angle; . . . S 44. 26. 14" W 162.62 feet to a point for the end of this easement in the south line of stid 97.904 acro tract out of Survey 1, Block 2, G. C. & S. P. RR. Co., Subleicher County, Texes, and out of said Survey 2, said end point of this casement also being in the south line of the 70,669. acre tract being that portion of said 97.904 acre tract lying in said Survey 2 from whence a point for the most easterly southeast corner of said 97.904 are tract and of the 70.669 are tract bears N 88" 04' 17" E 222.27 feet, a fance corner post bears N.88" 04' 17" E 227.31 feet, and a found southered stone mound for the northeast corner of said Survey 2 and the northwest corner of SHIVEY.3, Block 2, Abstract No. 125, G.C. & S.F. R.R.Co., Schleicher County, Texns, hears N. 51" 31" 18" B 276.69 feet. Sell · . .: 354 Surveyed on the ground under my supervision according to the Minimum Standards of the Professional Land Surveying Practices Act and General Rules of Propedures and Practices set forth by the Texas Board of Professional Land Surveying. Myrl G. Sudfinth

Registered Brofessional Land Surveyor No. 2928 July 25, 2011 (Revised September 19, 2011)

File Names Handy Essemen 70 AoTrad Survey 2 F.H

Field Notes A barty feet (30.00') wide road easement over and across a portion of Survey 5, Block A-2, Abstract No. 43, Schleicher County, Taxas, said road easement being more particularly defined as being fifteen feet (15.00') on each side of the following described centerline: BBGINNING at a point in said Survey 5 from whence a point for the northeast corner of Survey. 3, Block 2, Abstract No. 125, G. C. & S. F. RR. Co., Schleicher County, Texas bears S 86" 48" 11" W 743,49 feet and a found 1/1-4" iron pipe for the southeast corner of Survey 5, Block A-2 Abstract No. 1244: and the south west-porner of said Survey 5 bears \$ 89: 09. 18" W 1894.80 feet: THENCE slong the contorline of said thirty feet (30.00') road easement as follows: N 89° 59' 00". W 290.02 feet to a point of angle; N 89" 36'.02" W 399.09 feet to a point of angle 1 11. S 89° 35' 45" W.179.22 fact to d point of angle," S 89° 49' 28"-W-418,20 feet to a point of angle; . S 89° 13' 43" W 408 16 feet to a noint in the way time of said Survey 3. Block A-2. Abstract No. 43, Schleicher County, Fexas, and the east line of said Survey 5 for the end of this assument from whence a point for the wortheast corner of said Survey 3 bears 5.36' 48' 11" W 743.49 feet and a found 1/1-4" fron pipe for the southeast corner of said Survey 6 and the. southwest corner of said Survey 5 bears 6 0' 04' 24" B 32,35 feet. Surveyed on the ground under my supervision according to the Minimum Standards of the Professional Land Surveying Practices Act and General Rules of Procedures and Practices set forth by the Texas Board of Professional Land Surveying. Myri G. Sudouth Registered Professional Land Surveyor No; 2928 July 25, 2011

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