

**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 (AKA ROGER) SAHOTA; and RUSTIN BRUNSON,**

**Defendants,**

and

**DODSON PRAIRIE OIL & GAS LLC;  
PANTHER CITY ENERGY LLC; MURATORE  
FINANCIAL SERVICES, INC.; BRIDY IKEY;  
ENCYIPHER 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.

**Civil No. 4:21-cv-01310-O**

**FILED UNDER SEAL**

## **ASSET FREEZE ORDER**

Plaintiff United States Securities and Exchange Commission has filed an Emergency Motion for a Temporary Restraining Order and Emergency Ancillary Relief (“Motion”). The Court, having considered the Motion, the memorandum of law in support thereof, the declarations, exhibits and all other documents filed contemporaneously therewith; having reviewed the SEC’s complaint and other submissions it has filed in this matter; having considered the arguments of counsel; and having been fully advised of such in the premises, hereby finds as follows:

A. This Court has subject matter jurisdiction over this case and there is good cause to believe it will have personal jurisdiction over defendants 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; Manjit Singh (aka Roger) Sahota; and relief defendants Dodson Prairie Oil & Gas LLC; Panther City Energy LLC; Encypher Bastion, LLC; Barron Energy Corporation; Dallas Resources Inc.; Leading Edge Energy, LLC; Sahota Capital LLC, which is also known as Sahota Capital Corporation or Sahota Capital Inc.; and 1178137 B.C. LTD. (any and each of these parties is referred to in this Order as an “Asset Freeze Party”; they are collectively referred to herein as the “Asset Freeze Parties”), and the SEC is a proper party to bring this action seeking the relief sought in its complaint.

B. The SEC has made a sufficient and proper showing and there is good cause to believe that it will ultimately succeed in establishing that the Defendants have engaged and

are likely to engage in transactions, practices and courses of business that violate the federal securities laws, as alleged in the complaint, including Sections 5 of the Securities Act of 1933 [15 U.S.C. § 77e], Section 17a of the Securities Act of 1933 [15 U.S.C. §§ 77q(a)(1), 77q(a)(2), and 77q(a)(3)] and/or Section 10(b) and Rule 10b-5 of the Securities Exchange Act of 1934 [15 U.S.C. §78j(b); 17 C.F.R. 240.10b-5].

C. There is good cause to believe that the Defendants have obtained money or property from investors as a result of their securities laws violations alleged in the complaint.

D. There is good cause to believe that unless frozen by Order of this Court, assets that otherwise could have been subject to an order of disgorgement pursuant to Section 20(d) of the Securities Act of 1933 [15 U.S.C. § 77t(d)] and Section 21(d) of the Securities Exchange Act of 1934 [15 U.S.C. § 78u(d)] will be dissipated, concealed, or transferred from the jurisdiction of this Court.

E. An Order freezing assets of the Asset Freeze Parties is necessary to preserve the *status quo* and to protect this Court's ability to award equitable relief for the benefit of any investors who may have been harmed by the Defendants' conduct.

F. There is good cause to believe that providing notice of these proceeding may have resulted in the dissipation of assets or the compromising of evidence. The SEC's submissions clearly demonstrate that immediate and irreparable injury, loss, or damage would have resulted had the SEC provided such notice.

G. Therefore, the SEC's Motion should be, and is, granted as set forth more fully below.

For these reasons, it is **HEREBY ORDERED**:

A. All funds and other assets held, managed or controlled, whether directly or indirectly, by Asset Freeze Parties are hereby frozen.

B. The Asset Freeze Parties, and any of their agents, servants, employees, attorneys, depositories, banks, and those persons in active concert or participation with any one or more of them, and each of them, who receive actual notice of this Order or of the terms of the asset freeze provisions contained herein, by personal service, mail, facsimile transmission, email, or otherwise, are hereby restrained from, directly or indirectly, transferring, selling, encumbering, receiving, concealing, changing, pledging, hypothecating, assigning, liquidating, incurring debt upon, or otherwise disposing of, or withdrawing, any funds, assets or other property (including money, real or personal property, securities, chose in action or any other form of asset or property of any kind whatsoever).

C. The asset freeze articulated herein extends to accounts at any financial institution: (1) in the name of any Asset Freeze Party; (2) that any Asset Freeze Party has signatory authority or a beneficial interest; (3) that any Asset Freeze Party directly or indirectly controls, owns or manages; (4) held for the benefit of any Asset Freeze Party, including through corporations, trusts, partnerships, agents, nominees, friends or relatives; or (5) which are traceable to funds and assets, wherever located, belonging to the victims of the securities law violations alleged in the SEC's complaint.

D. Any Asset Freeze Party, and their agents, servants, employees, attorneys, depositories, banks, and those persons in active concert or participation with any one or more of them, and each of them, who receive actual notice of this Order or of the terms of the asset freeze provisions contained herein, by personal service, mail, facsimile

transmission, email, or otherwise, is hereby restrained from, directly or indirectly, transferring, selling, encumbering, receiving, concealing, changing, pledging, hypothecating, assigning, liquidating, incurring debt upon, or otherwise disposing of, or withdrawing, any funds or assets, that constitute investor funds or any accounts or property into which investor funds were deposited or invested.

E. Any Asset Freeze Party, and their agents, servants, employees, attorneys, depositories, banks, and those persons in active concert or participation with any one or more of them, and each of them, who receive actual notice of this Order or of the terms of the asset freeze provisions contained herein, by personal service, mail, facsimile transmission, email, or otherwise, are hereby restrained from opening or causing to be opened any safe deposit boxes, commercial mail boxes, or storage facilities titled in the name of any Asset Freeze Party, or subject to access by them, without providing the SEC prior notice and an opportunity to inspect the contents in order to determine whether they contain assets subject to this Order.

F. Any bank, financial or brokerage institution or other person or entity holding any such funds or anything else of value, in the name of, for the benefit of, or under the control of any Asset Freeze Party, or any account holding investor funds wherever located, and that receives actual notice of this Order or of the terms of the asset freeze provisions contained herein, by personal service, mail, email, facsimile transmission or otherwise, shall hold and retain within its control and prohibit the withdrawal, removal, transfer, disposition, pledge, encumbrance, assignment, set off, sale, liquidation, dissipation, concealment, or other disposal of any such funds, assets or property belonging to any Asset

Freeze Party, or in which any Asset Freeze Party has a beneficial interest, wherever located and held in whatever name.

G. Asset Freeze Parties, and each of their officers, agents, servants, employees and attorneys and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, including facsimile transmission, electronic mail, or overnight delivery service, shall hold and retain funds and other assets of any Asset Freeze Party presently held by them, for their direct or indirect benefit, under their direct or indirect control or over which they exercise actual or apparent investment or other authority (including assets held in the name of or for the benefit of any Asset Freeze Party, in whatever form such assets may presently exist and wherever located, and shall prevent any withdrawal, sale, payment, including, but not limited to, any charges on any credit card or draws on any other credit arrangement), transfer, dissipation, assignment, pledge, alienation, encumbrance, disposal, or diminution in value of any such funds or other assets, which are hereby frozen, including, but not limited to, such funds held in the following accounts:

| INSTITUTION NAME | ACCOUNT NUMBER | ACCOUNT HOLDER                              |
|------------------|----------------|---------------------------------------------|
| Bank of America  | XXXXXXXXXX6254 | Heartland Production & Recovery LLC         |
| Wells Fargo Bank | XXXXXXXX0120   | Heartland Production & Recovery LLC         |
| Bank of America  | XXXXXXXX6335   | Heartland Production & Recovery Fund LLC    |
| Wells Fargo Bank | XXXXXXX0112    | Heartland Production & Recovery Fund LLC    |
| Wells Fargo Bank | XXXXXXX2762    | Heartland Production & Recovery Fund II LLC |
| Wells Fargo Bank | XXXXXXX8394    | Heartland Drilling Fund I LP                |
| Wells Fargo Bank | XXXXXXX4082    | Heartland Group Ventures LLC                |
| Wells Fargo Bank | XXXXXXX4074    | Heartland Group Fund III LLC                |
| Wells Fargo Bank | XXXXXXX3034    | Carson Oil Field Development Fund II LP     |

| INSTITUTION NAME             | ACCOUNT NUMBER | ACCOUNT HOLDER                                                                                                       |
|------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------|
| PlainsCapital Bank           | XXXXXX0001     | Alternative Office Solutions LLC                                                                                     |
| PlainsCapital Bank           | XXXXXX0901     | Alternative Office Solutions LLC                                                                                     |
| Wells Fargo Bank             | XXXXXX0313     | Encypher Bastion LLC                                                                                                 |
| JP Morgan Chase Bank         | XXXXXX5581     | ArcoOil Corp.                                                                                                        |
| Wells Fargo Bank             | XXXXXX6891     | Barron Petroleum LLC                                                                                                 |
| First State Bank             | XXX0550        | Barron Petroleum LLC                                                                                                 |
| Wells Fargo Bank             | XXXXXX3910     | Dallas Resources Inc.                                                                                                |
| Wells Fargo Bank             | XXXXXX8283     | Dallas Resources Inc.                                                                                                |
| Wells Fargo Bank             | XXXXXX4815     | Barron Energy Corp.                                                                                                  |
| Wells Fargo Bank             | XXXXXX1573     | Panther City Energy LLC                                                                                              |
| Wells Fargo Bank             | XXXXXX6661     | Panther City Energy LLC                                                                                              |
| Bank of Jackson Hole         | XXXXXX4116     | ArcoOil Corp.                                                                                                        |
| Bank of Jackson Hole         | XXXXXX4108     | Barron Energy Corp.                                                                                                  |
| Bank of Jackson Hole         | XXXXXX4132     | Barron Petroleum LLC                                                                                                 |
| Bank of Jackson Hole         | XXXXXX4140     | Dallas Resources Inc.                                                                                                |
| Bank of Jackson Hole         | XXXXXX4124     | Sahota Capital Corporation and/or<br>Sahota Capital LLC and/or<br>Sahota Capital Inc. and/or<br>Sahota Capital Corp. |
| The Toronto Dominion<br>Bank | XXX9049        | 1178137 B.C. Ltd.                                                                                                    |
| JP Morgan Chase Bank         | XXXXXX8608     | Leading Edge Energy LLC                                                                                              |

H. To facilitate this asset freeze, no later than 9 a.m. tomorrow, each Asset Freeze Party shall identify with specificity to the SEC all accounts, including bank accounts, brokerage accounts, retirement accounts, and/or trust accounts, in which that Asset Freeze Party has an ownership or beneficial interest.

**SO ORDERED this 2nd day of December, 2021.**

  
 Reed O'Connor  
 UNITED STATES DISTRICT JUDGE