

Sahota-related entities.² Certain Sahota-related entities sold interests in mineral leases to Heartland. The SEC does not allege that the Sahota-related entities were obligated under some contractual provision—or otherwise—to spend the funds received from Heartland in some particular way. Nor does the SEC allege that Heartland did not receive the interests in mineral leases that it purchased from the Sahota-related entities. Between 2019 and 2021, Heartland paid the Sahota-related entities more than \$22,000,000 for interests in mineral leases. Ex. 1 (Declaration of Sunny Sahota, “Sahota Dec.”) at Ex. A. Heartland received what it paid for, and the Sahota-related entities were free to spend those funds as they wished.

In 2019, when the airplane in question was purchased, the Sahota-related entities started the year with a balance of around \$930,000, received almost \$2.3 million in non-Heartland income, and received around \$8 million from Heartland for the purchase of mineral lease interests. Sahota Dec. at Ex. A. The SEC alleges that the plane cost \$1.4 million, and the Receiver says that it cost around \$1.66 million.³ Either way, there were ample funds available to cover this cost, even excluding all Heartland income.

In 2021, when the helicopter was purchased, the Sahota-related entities started the year with a balance of more than \$3 million, received almost \$1.5 million in non-Heartland income, and received around \$4.7 million from Heartland for the purchase of mineral lease interests. Sahota Dec. at Ex. A. The SEC alleges that the helicopter cost \$1.8 million, and the Receiver says that it cost \$2 million.⁴ In either case, the Sahota-related entities had enough funds available.

² The “Sahota-related entities” are Defendants Barron Petroleum LLC and Arcooil Corp. and Relief Defendants Barron Energy Corporation, Dallas Resources Inc., Leading Edge Energy, LLC, Sahota Capital LLC, and 1178137 B.C. Ltd.

³ Complaint at ¶ 122; Receiver’s Motion at ¶ 3.

⁴ Complaint at ¶ 122; Receiver’s at Motion ¶ 3.

II. CONCLUSION

Because there are sufficient jointly-owned assets in the Receivership Estate to satisfy Sahota's potential disgorgement—as shown in the recently-filed Motion to Terminate or Modify Receivership Order and Asset Freeze Order—and because the plane and helicopter were purchased with Sahota-related entities' funds, the use of which was not restricted in any way, the Court should deny the Receiver's Motion and direct the Receiver not to sell any more assets that are wholly owned by the Sahota-related entities.

Respectfully submitted,

VEDDER PRICE PC

By: /s/ Jeff J. Ansley
Jeffrey J. Ansley (SBN 00790235)
100 Crescent Court, Ste. 350
Dallas, Texas 75201
Telephone: (469) 895-4790
Facsimile: (469) 895-4802
jansley@vedderprice.com

EDMUNDSON SHELTON WEISS PLLC
J. Kevin Edmundson (SBN 24044020)
Jesse Z. Weiss (SBN 24013728)
317 Grace Ln., Ste. 210
Austin, Texas 78746
Telephone: (512) 596-3058
Facsimile: (512) 532-6637
kevin@eswpllc.com
jesse@eswpllc.com

**COUNSEL FOR MANJIT SINGH
"ROGER" SAHOTA**

CERTIFICATE OF SERVICE

I certify that on February 18, 2022, a true and correct copy of the above and foregoing instrument was filed electronically through the Court's CM/ECF system, which will give notice of this filing to all parties.

/s/ Jeff J. Ansley

Jeffrey J. Ansley

2. After reviewing the bank statements and other accounting records, and based on my personal knowledge, I am providing this declaration and the spreadsheet I created (attached as Exhibit A) to explain the income that the Sahota-related entities received (a) from non-Heartland sources, (b) from Heartland specifically for the purchase of interests in mineral leases, and (c) the bank account balances at the beginning of each of 2018-2021.

3. I submit this declaration in support of an objection filed by Roger Sahota to the Receiver's motion to sell an airplane and helicopter that are owned by a Sahota-related entity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 16, 2022



SUNNY SAHOTA

Exhibit A

**Sunny Sahota Declaration
February 16, 2022**

**Accounting for Non-Heartland Deposits, Balance Carry Forwards
and Mineral Lease Interests Sold**
2018

Non Heartland Deposits	\$6,727,556.46
Balance Carried Forward from 2018	\$11,661.23
Total	\$6,727,556.46

2019

Non Heartland Deposits	\$2,271,431.77
Balance Carried Forward from 2018	\$930,069.29
Heartland Mineral Lease Interest Purchases	\$8,064,000.00
Total	\$11,265,501.06

2020

Non Heartland Deposits	\$1,662,422.58
Balance Carried Forward from 2019	\$991,385.86
Heartland Mineral Lease Interest Purchases	\$9,227,140.95
Total	\$11,880,949.39

2021

Non Heartland Deposits	\$1,493,110.82
Balance Carried Forward from 2020	\$3,049,304.09
Heartland Mineral Lease Interest Purchases	\$4,718,811.60
Total	\$9,261,226.51

Total Non Heartland Deposits In Sahota Accounts From 2018-2021	\$12,154,521.63
---	------------------------