

**RECEIVER’S REPORT REGARDING DISPOSITION OF
CANADAIR LTD CL-600-2B16, REGISTRATION NO. N486BG, SERIAL NO. 5133**

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the Court’s December 2, 2021 *Order Appointing Receiver* [ECF No. 17] (the “Receivership Order”) and receivership estates (collectively, the “Estates”) in the above-captioned case (the “Case” or “Receivership”), hereby files this *Receiver’s Report Regarding Disposition of Canadair LTD CL-600-2B16, Registration No. N486BG, and Serial No. 5133* (the “Report”).¹

I. BACKGROUND

1. On December 1, 2021 (the “Application Date”), the Securities and Exchange Commission (the “SEC” or the “Commission”) filed its *Emergency Motion for a Temporary Restraining Order and Emergency Ancillary Relief* [ECF No. 3] which included an application for the appointment of a receiver for the Receivership Parties.

2. On December 2, 2021, this Court determined that entry of an order appointing a receiver over the Receivership Parties was both necessary and appropriate to marshal, conserve, hold, and operate all of the Receivership Parties’ assets (the “Receivership Assets”) pending further order of this Court. Accordingly, the Court entered the Receivership Order on December 2, 2021, appointing Deborah D. Williamson as the Receiver over the Estates in this Case

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Receivership Order or the Aircraft Order, as applicable.

[ECF No. 17]. That same day, the Court entered the *Order for Temporary Restraining Order and Other Emergency Relief* [ECF No. 12], and the *Asset Freeze Order* [ECF No. 14].

3. On February 14, 2022, the Receiver filed the *Receiver's Motion for Authority to Consummate Sales of Aircraft or, In the Alternative, to Approve Procedures and Authorize Sale of Aircraft* [ECF No. 131] (the "Aircraft Motion"), requesting Court approval of the procedures and sale of certain aircraft, including the Canadair LTD CL-600-2B16 (the "Jet"), that constitute Receivership Assets.

4. On February 18, 2022 Defendant Roger Sahota ("Roger") filed his Objection [ECF No. 141] (the "Objection"), opposing the relief requested by the Receiver in the Aircraft Motion.

5. On February 28, 2022, the Court entered an Order [ECF No. 145] setting the Aircraft Motion, among other things, for hearing on March 11, 2022, at 1:30 p.m. Central.

6. After considering the Receiver's Motion, Roger's Objection, the arguments of counsel, and the evidence presented at the March 11, 2022 hearing, the Court entered an Order [ECF No. 164] (the "Initial Order") granting the Receiver's Aircraft Motion on March 18, 2022. The Initial Order contained an inadvertent transposition of the Jet model number.

7. On March 29, 2022, the Receiver filed the *Receiver's Motion for Entry of Corrected Order* [ECF No. 164] *Granting Receiver's Motion for Authority to Consummate Sales of Aircraft* [ECF No. 131] [ECF No. 168] (the "Motion for Corrected Order"), seeking entry of a corrected order regarding the Jet model number.

8. On March 30, 2022, the Court entered an Order [ECF No. 171] (the "Service Order") setting an objection deadline of Friday, April 1, 2022, at 5:00 p.m. to the Receiver's

Motion for Corrected Order and requiring the Receiver to serve the Service Order by Thursday, March 31, 2022, at noon.

9. On March 30, 2022, the Receiver filed the *Notice of Service of Court Order Regarding Receiver's Motion for Entry of Corrected Order [ECF No. 164] Granting Receiver's Motion for Authority to Consummate Sales of Aircraft [ECF No. 131] [ECF No. 171] [ECF No. 172]* (the "Notice") in accordance with the Service Order.

10. On April 4, 2022, the Receiver filed the *Certificate of No Objection* [ECF No. 173] to the Notice.

11. On April 4, 2022, the Court entered an Order [ECF No. 174] granting the Receiver's Motion for Corrected Order.

II. REPORT

12. On April 5, 2022, the Receiver closed on the sale (the "Sale") of the Jet. A true and correct copy of the Seller's Closing Statement is attached hereto as **Exhibit A**. The Sale gross proceeds were \$1,750,000.00. Contractual and Court-approved escrow and registry fees totaled \$1,275.00. The Sale net proceeds to the Receiver for the benefit of the Estates totaled **\$1,748,725.00**.

13. The escrow agent, AIC Title Service LLC, wired \$1,748,725.00 to the Receivership bank account on April 5, 2022. There are no further amounts due.

Dated: April 5, 2022

Respectfully submitted,

By: /s/ Danielle N. Rushing

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COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2022, the foregoing document was served via CM/ECF on all parties appearing in this case.

/s/ Danielle N. Rushing

Danielle N. Rushing

EXHIBIT A



SELLER'S CLOSING STATEMENT

PREPARED FOR:
Deborah D. Williamson as Receiver (Seller)

Statement No: ACR-120887-S
 Date: 04/05/2022

Airframe: N486BG, CANADAIR LTD, CL-600-2B16 SN: 5133
Engine: GE, CF34-3A2 SN: 350523
Engine: GE, CF34-3A2 SN: 350522

FUNDS RECEIVED FROM	DATE	AMOUNT
Yaletown FM	10 Jan 2022	\$99,975.00
When and Where Inc.	04 Apr 2022	\$1,650,025.00
TOTAL RECEIVED FUNDS		\$1,750,000.00

FUNDS RELEASED TO	DATE	AMOUNT
The Heartland Group Ventures LLC	05 Apr 2022	\$1,748,725.00
AIC Title Service LLC escrow fee, buyer one-half	05 Apr 2022	\$875.00
AIC Title Service LLC IR sign up fee for Deborah D. Williamson	05 Apr 2022	\$400.00
TOTAL RELEASED FUNDS		\$1,750,000.00
		Balance: \$0.00

Suzanne Pruitt

Suzanne Pruitt - Closing Agent
 AIC Title Service, LLC