

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.

No. 4:21-cv-1310-O-BP

**RECEIVER'S MOTION FOR ORDER GOVERNING PROCEDURES FOR THE SALE OR ABANDONMENT OF PERSONAL PROPERTY AND BRIEF IN SUPPORT**

TO THE HONORABLE COURT:

COMES NOW Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the "Receiver") for the Receivership Parties (as defined in the Receivership Order)<sup>1</sup> and receivership estates (collectively, the "Receivership Estates") in the above-captioned case (the "Case" or the "Receivership"), hereby files this *Receiver's Motion for Order Governing the Procedures for the Sale or Abandonment of Personal Property and Brief in Support* (the "Motion"), requesting entry of an order, substantially in the form of the proposed order (the "Proposed Order") attached hereto as **Exhibit B**, governing the administration of the Receivership and procedures for the sale or abandonment of personal property. In support of this Motion, the Receiver respectfully represents as follows:

**I. BACKGROUND**

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

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 pending further order of this Court. Accordingly, the Court entered the *Order Appointing Receiver* (the "Receivership Order") on December 2, 2021 [ECF No. 17], appointing Deborah D. Williamson as the Receiver over the Receivership Estates in this Case. The Receivership Order directed the Receiver to take possession

---

<sup>1</sup> Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Receivership Order.

and control over all funds, property, and other assets in the possession of, or under the control of Receivership Parties. Receivership Order, ¶ 8.

3. The Receivership Order also authorizes the Receiver to do other various things regarding Receivership Assets. For instance, paragraph 41 authorizes the Receiver to:

without further Order of this Court, transfer, compromise, or otherwise dispose of any Receivership Property, other than real estate, in the ordinary course of business, on terms and in the matter the Receiver deems most beneficial to the Receivership Estate, and with due regard to the realization of the true and proper value of such Receivership Property.

Next, Receivership Order, ¶ 41, paragraph 8(C) authorizes the Receiver to “hold in the Receiver’s possession, custody and control all Receivership Property, *pending further Order of this Court.*” *Id.* at ¶ 8(C) (emphasis added). Paragraphs 42 and 43 further authorize the Receiver as follows:

[s]ubject to Paragraph 43 . . . list for sale or lease, engage a broker for sale or lease, cause the sale or lease, and take all necessary and reasonable actions to cause the sale or lease of all personal or real property in the Receivership Estates, either at public or private sale, on terms and in the manner the Receiver deems most beneficial to the Receivership Estate, and with due regard to the realization of the true and proper value of such real property.

43. Upon further Order of this Court, pursuant to such procedures as may be required by this Court and additional authority such as 28 U.S.C. §§ 2001 and 2004, the Receiver will be authorized to sell, and transfer clear title to, all real property in the Receivership Estates.

Moreover, paragraph 8(E) expressly authorizes the Receiver “[t]o ***abandon*** any asset that, in the exercise of the Receiver’s reasonable business judgment, will not provide benefit or value to the Receivership Estates.” *Id.* at ¶ 8(E) (emphasis added).

4. Obtaining court approval and direction regarding certain procedural and administrative matters as the Receivership progresses preserves the Receivership Assets and ensures the Receiver conducts the Receivership consistent with the Court’s instructions.

Accordingly, the Receiver requests that the Court enter the Proposed Order granting this Motion which, as described below, includes general procedures for giving notice and service.

5. Further, in accordance with the Receivership Order, the Receiver located and took actual or constructive possession of certain personal property owned by Defendants and Relief Defendants, including (without limitation) the personal property listed in **Exhibit A** attached hereto. Furthermore, the Receiver anticipates that in the future she may acquire additional property owned by Defendants and Relief Defendants (collectively, the “Personal Property”). On information and believe, all of the assets listed in **Exhibit A** constitute Receivership Assets within the meaning of the Receivership Order. In accordance with 28 U.S.C. § 2004 and the various provisions of the Receivership Order, the Receiver requests entry of the Proposed Order setting forth the specific methods and procedures, prospectively, by which the Personal Property may be sold, abandoned or otherwise disposed of so as to avoid burdening the Court with otherwise routine matters.

## **II. AUTHORITIES**

6. It is well-settled that a receivership’s primary goal is to provide a conduit through which assets can be held, liquidated, and distributed to the receivership beneficiaries. *See, e.g., SEC v. Safety Fin. Serv., Inc.*, 674 F.2d 369, 371 (5th Cir. 1982). In this Case, the beneficiaries include the numerous investors and creditors of the Defendants and the Relief Defendants who orchestrated and operated a Ponzi scheme that divested investors of millions of dollars.

7. A receiver is neither plaintiff or defendant, but instead, acts as the Court’s agent with respect to the administration of property. *Clark v. Clark*, 58 U.S. 315, 331 (1855); *FSLIC v. PSL Realty Co.*, 630 F.2d 515, 521 (7th Cir. 1980), *cert. denied*, 452 U.S. 961 (1981) (explaining the “receiver is an officer of the court and subject to its order in relation to the property for which

he is responsible until discharged by the court”); *Fed. Home Loan Mortg. Corp. v. Spark Tarrytown, Inc.*, 829 F. Supp. 82, 85 (S.D.N.Y. 1993). The orders of the appointing court are the sole source of a receiver’s authority, and receivers are thus authorized to petition the appointing court on matters related to the receivership’s administration. *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994); *see also Liberte Capital Grp., LLC v. Capwill*, 248 Fed. App’x 650, 655 (6th Cir. 2007); *PSL Realty Co.*, 630 F.2d at 521. Nevertheless, if the order appointing the receiver is silent on an aspect of the receivership’s administration, courts look to the common law governing receiverships that has arisen and evolved over the centuries. Only if *both* the order appointing the receiver and federal receivership common law are silent on the determinative issues should courts look to other bodies of law for guidance. *See, e.g., Janvey v. Alguire*, No. 3:09-CV-0724-N, 2014 U.S. Dist. LEXIS, at \*103–04 (N.D. Tex. Jul. 30, 2014) (noting the dearth of guidance available from existing caselaw on the interplay between the Federal Arbitration Act and federal equity receiverships and, as a result, looking to bankruptcy caselaw for guidance).

8. While caselaw involving district courts’ administration of an equity receivership is “sparse,” two basic principles emerge from cases involving receiverships. *SEC v. Hardy*, 803 F.2d 1034, 1037 (9th Cir. 1986). First, courts have “extremely broad” powers and discretion to “determine the appropriate action to be taken in the administration of the receivership.” *Id.*; *see SEC v. Safety Fin. Serv., Inc.*, 674 F.2d 368, 373 (5th Cir. 1982) (holding that the court overseeing the receivership is given “wide discretionary power” in light of “the concern for orderly administration”). Second, a “primary purpose” of receivership is to promote the orderly and efficient administration of the estate. *Id.* This includes liquidation of the receivership assets. *SEC v. Millennium Bank*, No. 7:09-CV-050-O, 2009 U.S. Dist. LEXIS 140912, at \*8 (N.D. Tex. Jul. 21, 2009) (explaining that the court’s discretion includes “the power to permit a Receiver to sell

property where appropriate to protect the receivership estate”) (citing *SEC v. Elliot*, 953 F.2d 1560, 1566 (11th Cir. 1992)).

9. When analyzing a receiver’s proposed disposition of property, courts apply the highly deferential “business judgment” standard. *See, e.g., Golden Pac. Bancorp v. FDIC*, No. 95 Civ. 9281 (NRB), 2002 U.S. Dist. LEXIS 24961, at \*9 (S.D.N.Y. Dec. 26, 2003), *aff’d by* 375 F.3d 196 (2d Cir. 2004). This standard is identical to the test courts use to analyze whether fiduciaries, such as bankruptcy trustees, acted in accordance with their fiduciary duties. *See, e.g., In re Bakalis*, 220 B.R. 525, 531–32 (Bankr. E.D.N.Y. 1998). Accordingly, when a receiver’s proposed disposition of property is questioned, the issue before the court is whether the receiver exercised discretion in a reasonable manner, in good faith, and for sound business reasons with regards to the procedures implemented to sell the property. *See Matter of Bank of N.Y. Mellon*, 4 N.Y.S.3d 204, 207 (App. Div. 1st Dep’t 2015) (stating a fiduciary comports with his fiduciary duty if he exercises his discretionary power “reasonably and in good faith”); *Corbin v. Fed. Reserve Bank of N.Y.*, 475 F. Supp. 1060, 1071 (S.D.N.Y. 1979) (noting the receiver does not breach his fiduciary duty if he exercises “reasonable business judgment”); *see also Lawskey v. Condor Capital Corp.*, No. 14 CIV. 2863 (CM), 2015 U.S. Dist. LEXIS 96347, at \*17–18 (S.D.N.Y. Jul. 21, 2015).

10. “[R]easonable procedures instituted by the district court that serve [receivership’s] purpose[s]” are generally upheld. *Hardy*, 803 F.2d at 1038. Actions by a court supervising a receivership will not be disturbed unless there is a clear showing of abuse. *Safety Fin. Serv.*, 674 F.2d at 372 (citing *SEC v. Arkansas Loan & Thrift Corp.*, 427 F.2d 1171, 1172 (8th Cir. 1980)). The procedures detailed herein, in the Receiver’s reasonable business judgment, are in the best

interest of the Receivership Estates and their creditors. Moreover, identical or similar procedures have been authorized by other judges in the United States District Courts of Texas.<sup>2</sup>

### **III. REQUESTED PROCEDURES**

11. The Receiver's goals include operation of the Receivership with the greatest efficiency possible so as to preserve assets for the eventual distribution to the investors and creditors. In this regard, the Receiver proposes use of the following procedures:

#### **A. PROCEDURES FOR THE DISPOSITION OF PERSONAL PROPERTY**

12. The Court may establish procedures governing the sale of personal property.<sup>3</sup> The Receiver recommends disposing of all Personal Property currently in her possession or hereafter acquired in accordance with the procedures set forth herein. The Receivership Estates will suffer unnecessary delay and expense if the Receiver files a pleading with this Court each time she seeks to sell or otherwise dispose of an item of Personal Property. Additionally, the Receiver seeks to avoid burdening the Court with routine and ministerial Receivership matters if an acceptable procedure for disposition of the Personal Property can be established, and further, believes the limited procedure for sale by public sale set forth in 28 U.S.C. § 2001 will result in a smaller recovery than can be obtained by utilizing alternative other sales methods as appropriate. Accordingly, the Receiver proposes disposing of Personal Property that may exceed \$1,000 in

---

<sup>2</sup> See *SEC v. Star Exploration, Inc., et al.*, No. 3:08-CV2248-O, ECF No. 14 (N.D. Tex. Jan. 22, 2009) (Judge Reed O'Connor) (approving similar procedures governing the receivership generally and the sale of personal property); *SEC v. Gallagher, et al.*, No. 3:19-CV-575-C, ECF No. 33 (N.D. Tex. Apr. 18, 2019) (Senior Judge Sam R. Cummings); *SEC v. Arisebank, et al.*, No. 3:18-CV-0186-M, ECF No. 83 (N.D. Tex. Aug. 1, 2018) (Chief Judge Barbara M. G. Lynn) (approving nearly identical procedures for the disposition of tangible personal property); *SEC v. White, et al.*, No. 4:13-CV-0383, ECF No. 32 (E.D. Tex. Jul. 26, 2013) (Judge Don D. Bush) (approving similar procedures for disposition of personal property); *SEC v. May, et al.*, No. 3:10-CV-425-L, ECF No. 21 (N.D. Tex., March 22, 2010) (Judge Sam A. Lindsay); *SEC v. Poetter, et al.*, No. 6:09-CV-0398, ECF No. 14 (E.D. Tex., Nov. 6, 2009) (Judge Michael H. Schneider); *SEC v. Titan Wealth, et al.*, No. 4:09-CV-0418-MHS-ALM, ECF No. 100 (E.D. Tex., May 26, 2010) (Judge Michael H. Schneider); *CFTC v. Hudgins, et al.*, No. 08-CV-0187, ECF No. 42 (E.D. Tex., Jul. 9, 2008) (Judge Leonard Davis).

<sup>3</sup> 28 U.S.C. § 2004 ("Any personalty sold under order and decree of any court of the United States shall be sold in accordance with section 2001 of this title, unless the court orders otherwise.")

value<sup>4</sup> in accordance with one of the following procedures: Public Sale, Private Sale, Auction, or Abandonment.

13. With respect to all manners of sale listed below, none of the parties to this Case or the Receiver, her agents, assigns, or employees may purchase any of the Personal Property.

**i. Private Sale**

14. The Receiver seeks authorization to liquidate at a private sale the Personal Property in the possession of the Receiver in accordance with the following procedures:

a. The Receiver shall sell Personal Property at a private sale conducted by the Receiver or her staff or agents where the Personal Property will be offered for sale at a specific asking price, as determined by the Receiver. The Receiver shall set the sales price by determining value from any reputable source, such as a trade journal, appraisal, or comparable sales on public auction sites such as eBay. The Receiver may also set a reserve price which may, in the Receiver's sole discretion, be made public. The Personal Property need not be sold for the asking price but may be sold at any price at or above the reserve price, if one is set.

b. The Receiver will conduct the private sale in a location and provide such advertising as in the opinion of the Receiver is appropriate, if any, given the nature and condition of the property to be sold. Sales of certain intangible property, if any, will also be sold in accordance with any specific limitations or rules imposed by any applicable governing body.

c. Notice of terms of the sale shall be filed with the Court and posted to the receivership website, [www.heartlandreceivership.com](http://www.heartlandreceivership.com) (the "Notice Date") at least seven (7) calendar days before transferring title, possession, or other indicia of ownership in the property.

---

<sup>4</sup> As provided below, the Receiver requests authorization to utilize her discretion in abandoning or selling Personal Property valued at less than \$1,000, without further notice to the Court, but shall include a list of all such property sold or abandoned in appropriate periodic reports and in her final report.

If no bids exceeding the notice sale amount by at least 10% are received within seven (7) calendar days of the Notice Date, the Receiver may thereafter finalize the sale and transfer possession and ownership of the property pursuant to the sale's terms.

d. The Receiver shall pay from the Receivership Assets all reasonable and customary costs incurred in connection with the sale, without necessity of obtaining this Court's further authorization.

**ii. Auction**

15. In lieu of, or in addition to, a private sale, the Receiver seeks authorization to liquidate at a public auction Personal Property in the Receiver's possession in accordance with the following procedures:

a. The Receiver shall determine, in her discretion, which Personal Property should be sold by auction so as to obtain the highest net return on the Personal Property. The Receiver shall sell the Personal Property to the highest bidder at a public auction conducted by an established auctioneer or on a virtual platform, including eBay or other similar platforms. The Receiver will provide such advertising, if any, as in the opinion of the Receiver is appropriate given the nature and condition of the property to be sold.

b. The Receiver shall pay from the Receivership Assets all reasonable and customary costs incurred in connection with the auction, including any commission.

c. Notice of the terms of the sale will not be included in the Receiver's periodic reports to the Court, although net proceeds received from any auction and a general description of the Personal Property sold by auction will be reported.

**iii. Abandonment**

16. The Receiver believes that a substantial number of the items at Receivership Properties including, but not limited to: the Alternative Office Solutions, LLC (“AOS”) Office and CubeSmart storage units, the Graham residence, the Dallas Resources’s Ranch, and the San Angelo home, have little or no value. Moving and storing these items will result in substantial expenses to the Receivership Estates. Accordingly, the Receiver requests permission to abandon certain Personal Property.

17. In the event the Receiver is unable to sell an item of Personal Property pursuant to the procedures described herein, or if the Receiver believes in good faith that the property is valued at less than \$1,000 and the Receiver believes costs associated with an attempted sale or the costs of moving and storage will exceed the proceeds of the sale, the Receiver seeks the authorization to dispose of the item by either a direct negotiated sale, donation to charity, abandonment, or destruction without notice and without further order of this Court.<sup>5</sup>

18. Similarly, if the Receiver holds an interest as a lessee, or if the Personal Property is subject to a lien approximately equal to or in excess of the fair market value, the Receiver would net from a sale of the Personal Property, the Receiver seeks authorization to surrender the property to the lessor or creditor in exchange for the value, if any, of the interest held by the Receiver. The Receiver will include the description of any abandoned property in her final report.

---

<sup>5</sup> For example, the Graham property and AOS’s CubeSmart storage unit contain personal property of little or no value (*e.g.*, clothing, food, books, peach wine, kitchen utensils, toys, sporting equipment, etc.). To the extent the Receiver is advised that such personal property will not sell at an estate sale (or auction), the Receiver intends on abandoning such personal property, donating such personal property to a local charity, or otherwise disposing of same.

iv. **Notice of Intended Disposition**

19. The Receiver requests approval of the following notice procedures regarding sale, abandonment, auction, or other disposition (collectively, the “Disposition”) of any Personal Property:

a. The Receiver shall file a written notice of the intended Disposition of the item of Personal Property valued above \$1,000<sup>6</sup> and post that notice on the Receivership website, [www.heartlandreceivership.com](http://www.heartlandreceivership.com). The notice shall describe the property to be disposed of and the manner of Disposition (*e.g.*, abandoned, sold, auctioned).

b. The Receiver will also serve by first class U.S. mail, the written Notice described above on every person who has made a written request to the Receiver. The Receiver may in her discretion provide additional notice as she deems appropriate.

c. Any person who wishes to object to the proposed Disposition, shall file a written response with this Court setting forth the objection (or a claim of ownership or interest in Personal Property, identifying the source of your claim) and shall file and serve the response on the Receiver not less than ten (10) calendar days of the date the Notice is filed with the Court. The objection or claim must state why the proposed Disposition should not be approved by the Court and the basis for such belief (an “Objection”). The Receiver may request an expedited hearing on any Objection.

d. If no Objection is timely filed and served, the Receiver may dispose of the property in the manner described in the Notice without further order of the Court in accordance with these procedures and as described in the Notice.

---

<sup>6</sup> To avoid the time and cost in describing property with little or no value, such as many items at the Receivership Properties, including, but not limited, to the AOS Office, CubeSmart, and the Graham residence, the Receiver requests that the Court not require any notice prior to abandonment of any item valued at less than \$1,000.

e. If an Objection is timely filed and served, the proposed Disposition shall not be completed until such objection has been ruled upon by the Court.

f. The Receiver's reply to an Objection to the proposed Disposition shall be filed within five (5) business days of the Objection's filing.

g. The Court may thereafter determine, with or without a hearing, whether to (i) approve the Disposition, (ii) overrule an Objection, or (iii) sustain an Objection.

h. If no Objection is filed, or if the Court approves the Disposition subsequent to the filing of an Objection, the Receiver's sales of the Personal Property shall be free and clear of all liens, claims, interests, and encumbrances, unless the Court orders that such liens, claims, interests, or encumbrances shall attach to any sale proceeds.

i. Additionally, any person may submit to the Court a written offer for the Personal Property the Receiver seeks to dispose. If the offer is submitted to the Court within seven (7) calendar days from the date the Notice of Disposition is filed and is at least ten (10%) percent greater than the amount of any sale price included in the Notice, the person submitting the increased offer shall be entitled to purchase the property described in the Notice, without further order of the Court.

v. **Execution of Certificates of Title**

20. The Receiver also requests authorization to execute any certificate of title, assignment, bill of sale, or any other document necessary to effectuate the transfer of title to any Personal Property sold pursuant to the procedures outlined above.

**IV. CONCLUSION**

21. The Receiver, in her reasonable business judgment, believes the procedures described above are in the best interests of the Receivership Estates.

**WHEREFORE, PREMISES CONSIDERED**, the Receiver respectfully requests that, the Court enter the Proposed Order approving the procedures outlined above, and for such other relief, general, or special, at law or in equity, to which she may show herself justly entitled.

Dated: May 17, 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  
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 May 17, 2022, the foregoing document was served via CM/ECF on all parties appearing in this Case, including counsel for Plaintiff, Securities and Exchange Commission Motion and on the following unrepresented parties on this Court's docket:

James Ikey  
103 Bayonne Drive  
Mansfield, TX 76063  
[james.ikeyrcg@gmail.com](mailto:james.ikeyrcg@gmail.com)

*Via E-mail and U.S. First-Class Mail*

Bridy Ikey  
103 Bayonne Drive  
Mansfield, TX 76063  
[bridydikey@gmail.com](mailto:bridydikey@gmail.com)

*Via E-mail and U.S. First-Class Mail*

IGroup Enterprises LLC  
c/o James Ikey  
103 Bayonne Drive  
Mansfield, TX 76063  
[james.ikeyrcg@gmail.com](mailto:james.ikeyrcg@gmail.com)

*Via E-mail and U.S. First-Class Mail*

John Muratore  
c/o Theodore Grannatt  
McCarter & English, LLP  
265 Franklin Street  
Boston, MA 02110  
[tgrannatt@mccarter.com](mailto:tgrannatt@mccarter.com)

*Via E-mail and U.S. First-Class Mail*

Muratore Financial Services, Inc.  
c/o Theodore Grannatt  
McCarter & English, LLP  
265 Franklin Street  
Boston, MA 02110  
[tgrannatt@mccarter.com](mailto:tgrannatt@mccarter.com)

*Via E-mail and U.S. First-Class Mail*

Thomas Brad Pearsey  
c/o Theodore Grannatt  
McCarter & English, LLP  
265 Franklin Street  
Boston, MA 02110  
[tgrannatt@mccarter.com](mailto:tgrannatt@mccarter.com)

*Via E-mail and U.S. First-Class Mail*

*/s/ Danielle N. Rushing*  
Danielle N. Rushing

**EXHIBIT A: LIST OF PERSONAL PROPERTY<sup>1</sup>**

Location	Category	Item Name	Serial Number/VIN	Description
Aircraft Hangar	Electronics	iPad 16GB	Serial: DMQJTMEJDFHW Model: MC769LL/A	Entity: Dallas Resources; found on plane
Aircraft Hangar	Electronics	DVD writer, DVD player, 3 bay charger		Entity: Dallas Resources; found on plane
Aircraft Hangar	Miscellaneous	Notepad with notes re names and insurance		
Aircraft Hangar	Miscellaneous			
Aircraft Hangar	Miscellaneous		n/a	
Aircraft Hangar	Miscellaneous		n/a	
Aircraft Hangar	Miscellaneous		n/a	
Aircraft Hangar	Miscellaneous		n/a	
Aircraft Hangar	Miscellaneous		n/a	
Aircraft Hangar	Miscellaneous		n/a	
Aircraft Hangar	Miscellaneous		n/a	
Aircraft Hangar	Miscellaneous		n/a	
AOS - Ikey's home	Electronics	Galaxy Note 10	Model Number: SM-N970U Serial Number: R58MA3YP71W IMEI: 3588 2010 1155 413	Bridy Ikey's personal phone

---

<sup>1</sup> Inventories for the Eldorado and San Angelo properties were provided by Relief Defendant Sunny Sahota.

AOS Office	Electronics	Lenovo Laptop	IdeaPad 3 14ADA05 S/N: PF2BZYGP MTM: 81W0003QUS Mfg Date: 20/06/17 Factory Id: JVHFC1	Blue
AOS Office	Electronics	Dell Power Cord		
AOS Office	Electronics	Chicony Power Cord		
AOS Office	Electronics	Galaxy Z Gold2 5g	R3CN80XPPGY; IMEI: 3579 1182 0528 336	James Ikey's personal phone; Rose gold
AOS Office	Electronics	Computer Tower	CP319121501434;RM650	Name: Becky
AOS Office	Electronics	Computer Tower	CP319121501243; RM650	Name: Amberly
AOS Office	Electronics	Computer Tower	C4190715004716; AMD RYZEN 5	Name: Madi
AOS Office	Electronics	Computer Tower	C3519081501000; AMD RYZEN 5	Name: Extra
AOS Office	Electronics	Computer Tower	MCBB520KGNNRGB1200701017; Cooler Master	Name: James Anthony
AOS Office	Electronics	Computer Tower	MCYB5P2KWGN011194800325; RM 850; COOLER MASTER	Name: Lois
AOS Office	Electronics	Computer Tower	C419071004705	Name: Amanda
AOS Office	Electronics	Computer Tower	MCYB5P2KWGN011183900693; COOLER MASTER	Name: Rachel
AOS Office	Electronics	Computer Tower	MCYB5P2KWGN011194800510; RM 850; COOLER MASTER	Name: Jaxon
AOS Office	Electronics	Computer Tower	MCYB5P2KWGN011194800506; RM 850; COOLER MASTER	Name: #Pokemon2855

AOS Office	Electronics	Computer Tower	"01193174409222"; CA-H510B-B1	Name Dustin
AOS Office	Electronics	Sceptre Computer Monitor	C275B-144RN8RF8JF9KA K39L27CBIR4879	
AOS Office	Electronics	Sceptre Computer Monitor	C248W-1920RN8RC8J58JA K26T24CBIR2038	
AOS Office	Electronics	Sceptre Computer Monitor	C248W-1920RN8RC8J58JA K26T24CBIR2024	
AOS Office	Electronics	AOC Monitor		
AOS Office	Electronics	Keyboards (Quantity: 2)		
AOS Office	Electronics	Mouses (Quantity: 2)		
AOS Office	Electronics	Monitor (Quantity: 2)		
AOS Office	Furniture	Floor Mats (Quantity: 6)		
AOS Office	Furniture	Sit/Stand Desk (Quantity: 6)		
AOS Office	Furniture	Office chair (Quantity: 6)		
AOS Office	Furniture	Monitor Stand (Quantity: 5)		
AOS Office	Furniture	Rolling Whiteboard		
AOS Office	Furniture	Large Glass Whiteboard		
AOS Office	Appliances	Microwave		
AOS Office	Electronics	Galaxy Note 10+	RF8N50JYTXY; IMEI: 3596 1910 3303 578	James Ikey's Phone; Phone number: 817- 676-5604
AOS Office	Electronics	Galaxy S21 Ultra 5G	R5CR80SPBSD; IMEI: 3555 0229 1807 564	
AOS Office	Electronics	Amy's cell phone	RF8N50V9DVW; IMEI: 3596 1910 3351 809	
AOS Office	Electronics	Galaxy s10e	R58M67FLEWA; IMEI: 3547 7410 1079 061	Madison's Phone
AOS Office	Electronics	Galaxy Note 10+	RF8M901YQWY IMEI: 3592 7210 1614 396	Victoria's Phone

AOS Office	Electronics	Galaxy Note20 Ultra 5g	R3CR401G1YM; IMEI: 3527 1228 0858 486	Bridy's Phone
AOS Office	Electronics	Galaxy Note 10+	RF8N50ZBGJM IMEI: 3596 1910 3399 394	Becky's Phone
AOS Office	Electronics	Galaxy Z Fold2 5G	R3CR70PH29L; IMEI: 3510 4317 0911 734	Hayden's Phone
AOS Office	Electronics	Gray Gram Laptop	Serial Number: 909NZHH024473 Model Number: 17Z990 Mfg. Year 2019	
AOS Office	Electronics	Asus Window Laptop	Serial Number: L1N0CV073439036 Model Number: Q526F Mfg. year 2020	Silver
AOS Office	Electronics	Acer Predator Laptop	Serial Number: NHQ53AA003937030D12600 Model Number: N1812 Mfg. Year: 9/11/2019	Black and Blue
AOS Office	Electronics	Dell G7 Laptop	Serial Number: HDNYNHS2 Model Number: P40E Mfg. Year: 7/27/2019	Black
AOS Office	Electronics	Silver Dell Laptop XPS	ST: 34DZ353EX:6795683751Mfg Year: 2020 IFT No.: RCPINAX18- 2065CNC ID: C-22445	
AOS Office	Electronics	5 Flash Drives		Found in AOS office
AOS Office	Electronics	Benq Computer Monitor	S/N: ET59L06575SL0	
AOS Office	Electronics	Benq Computer Monitor	S/N: ET59L06553SL0	

AOS Office	Electronics	Sceptre Computer Monitor	C275B-144RN8RF8JF9KA K39L27CBIR4924	
AOS Office	Electronics	Arteck wireless keyboards (quantity: 6)		
AOS Office	Electronics	Microsoft Wireless Keyboard (quantity: 1)		
AOS Office	Electronics	Logitech Wireless mice (quantity: 5)		
AOS Office	Electronics	Microsoft Wireless Mouse (quantity: 1)		
AOS Office	Electronics	Iridium Satellite Phone		
AOS Office	Electronics	Large TV (Quantity: 1)		
AOS Office	Electronics	Brother Printer	TN630	
AOS Office	Electronics	HP Printer	M553	
AOS Office	Electronics	Toshiba Printer	XM7355	
AOS Office	Electronics	Fellowes Shredder		
AOS Office	Electronics	Surge Protectors (Quantity: 4)		
AOS Office	Electronics	Speakers (Quantity: 1)		
AOS Office	Electronics	Headphones (Quantity: 10)		
AOS Office	Electronics	Brother Speed Scanner ADS 28001		
AOS Office	Miscellaneous	USPS Box full of documents		
AOS Office	Miscellaneous	Blank checks for a number of different feeder funds.		
AOS Office	Miscellaneous	Box of Wine (Quantity: 16)		Have custom Heartland labels
AOS Office	Miscellaneous	Cigar holders (Quantity: 13)		Branded for Heartland
AOS Office	Furniture	Desk Mats (Quantity: 4)		
AOS Office	Appliances	Toaster Oven		
AOS Office	Furniture	Folding Table		
AOS Office	Furniture	Step Ladder		
AOS Office	Furniture	Arm Chairs (Quantity: 2)		
AOS Office	Furniture	Trash Cans (Quantity: 13)		
AOS Office	Furniture	Fans (Quantity: 4)		
AOS Office	Furniture	Lamps (Quantity: 8)		
AOS Office	Furniture	Couch (Quantity: 1)		
AOS Office	Furniture	Big Filing Cabinet (Quantity: 2)		
AOS Office	Furniture	Organizers (Quantity: 6)		

AOS Office	Furniture	Monitor Risers (Quantity: 2)		
AOS Office	Furniture	Pillows (Quantity: 4)		
AOS Office	Furniture	Rug (Quantity: 1)		
AOS Office	Furniture	Steel Wall Shelves (Quantity: 2)		
AOS Office	Furniture	Small Shelves (Quantity: 2)		
AOS Office	Furniture	Tall metal shelves (Quantity: 2)		
AOS Office	Miscellaneous	Christmas Decorations		
AOS Office	Furniture	Ikea Conference Table		
AOS Office	Miscellaneous	Kitchen Dishes and Utensils		
AOS Office	Appliances	Refrigerators (Quantity: 2)		
AOS Office	Furniture	Utility Desks (Quantity: 2)		
AOS Office	Miscellaneous	Vacuums (Quantity: 2)		
AOS Office	Furniture	Conference Chairs (Quantity: 9)		
AOS Office	Miscellaneous	Wine Holder		
AOS Office	Miscellaneous Office Supplies	Decorative Oil Rig		
AOS Office	Miscellaneous Office Supplies	Boxes of Thank You Notes (Quantity: 3)		
AOS Office	Office Supplies	Cardboard box mailers (Quantity: 19)		
AOS Office	Miscellaneous	3 Bankers boxes with paperwork, planners, and notebooks		
AOS Storage Unit (1587 FM 157)	Furniture	Standing Desks (Quantity: 6)		
AOS Storage Unit (1587 FM 157)	Miscellaneous	Miniature oil rig		
AOS Storage Unit (SH- 360)	Collectibles	Miscellaneous cut and uncut jade (approx. 6 boxes)		
Dallas Resources's Ranch - Eldorado, TX	Electronics	Samsung Galaxy	unknown	Rogers; Black with black otterbox

Dallas Resources's Ranch - Eldorado, TX	Electronics	Apple Iphone	unknown	Harprit's; Black with black otterbox
Dallas Resources's Ranch - Eldorado, TX	Electronics	Microsoft Surface Tablet	DEVICE ID: F0C7D482-FC90-4F22-9029-8D99A77BABFA; PRODUCT ID: 00330-62896-83711-AAOEM	Silver
Dallas Resources's Ranch - Eldorado, TX	Electronics	Microsoft Surface Tablet	DEVICE ID: 5AC5A432-C3F7-42B0-A843-9D427A1911EC; PRODUCT ID: 00342-23789-89982-AAOEM	Silver
Dallas Resources's Ranch - Eldorado, TX	Electronics	Microsoft Surface Tablet	DEVICE ID: EC282F4A-ECD3-4EB3-98DE-70F6174AFD7; PRODUCT ID: 00330-63030-89741-AAOEM	Silver
Dallas Resources's Ranch - Eldorado, TX	Electronics	Apple Macbook Pro	unknown	Gray; Monrose's
Dallas Resources's Ranch - Eldorado, TX	Electronics	USBs and Micro SDHC cards	unknown	
Dallas Resources's Ranch - Eldorado, TX	Electronics	HP Pavilion	unknown	
Dallas Resources's Ranch - Eldorado, TX	Electronics	Remarkable device and pen	RM110-133-65775	
Dallas Resources's Ranch - Eldorado, TX	Electronics	Verizon 5g wireless internet	no identifying information visible	black

Dallas Resources's Ranch - Eldorado, TX	Electronics	Quantity: 3		
Dallas Resources's Ranch - Eldorado, TX	Electronics	Living Room: TV		
Dallas Resources's Ranch - Eldorado, TX	electronics	Bedroom 1: TV		
Dallas Resources's Ranch - Eldorado, TX	Electronics	Living Room: TV		Purchased 2019
Dallas Resources's Ranch - Eldorado, TX	Sports and Hobby Equipment	Quantity: 1	n/a	
Dallas Resources's Ranch - Eldorado, TX	Furniture	Living Room: Sofas (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Living Room: Chairs (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Living Room: Tables (Quantity:2)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Living Room: Bookcase		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Living Room: Clock		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Living Room: Rugs (Quantity: 2)		

Dallas Resources's Ranch - Eldorado, TX	Decorations	Living Room: Pictures, decorations (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Dining Room: Table		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Dining Room: Chairs (Quantity: 8)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Kitchen: Lighting Fixture (Quantity: 1)		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Kitchen: Stove and range hood		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Kitchen: Microwave Oven		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Kitchen : Refrigerator		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Kitchen: Freezer		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Kitchen: Dishwasher		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Kitchen: Electrical Appliances (Quantity: 5)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Kitchen: Pots and Pans (Quantity: 10)		

Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Kitchen: Silverware (Quantity: 10)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Kitchen: Kitchen Utensils (Quantity: 10)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Kitchen: Dishes (Quantity: 20)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Kitchen: Glasses (Quantity: 20)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Kitchen: Liquor, wines (Quantity: 4)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Kitchen: Broom		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Kitchen: Cleaning Materials		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Bedroom 1: Box spring and mattress		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Bedroom 2: Box Spring and mattress		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Bathrooms: Cabinets (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Bathrooms: Shower Curtain (Quantity: 2)		

Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Bathrooms: Bath Mat (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Bathrooms: Hair dryers (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Bathrooms: Clothes Hampers (Quantity:2)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Bathrooms: Linens (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Bathrooms: Mirrors (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Gun Safe (Quantity: 1)		
Dallas Resources's Ranch - Eldorado, TX	Personal Effects	Mens (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Personal Effects	Womens (Quantity: 1)		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Laundry Room: Washing Machine		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Laundry Room: Dryer		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Laundry Room: Cabinets		

Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Laundry Room: Vacuum cleaners		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Garage/basement/attic: Sprinklers/hoses (Quantity: 4)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Garage/basement/attic : Garden tools and supplies (Quantity: 4)		
Dallas Resources's Ranch - Eldorado, TX	Miscellaneous	Garage/basement/attic: Ladder		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Porch/Patio/deck: Chairs (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Porch/Patio/deck: Table		
Dallas Resources's Ranch - Eldorado, TX	Appliances	Porch/Patio/deck: Outdoor cooking equipment (Quantity: 2)		
Dallas Resources's Ranch - Eldorado, TX	Furniture	Bedroom 2: Bed and Headboard		Purchased 2016
Dallas Resources's Ranch - Eldorado, TX	Appliances	Laundry Room: Vacuum cleaners (Quantity : 2)		Purchased 2019

Graham Office	Miscellaneous	1" Red Binders with ArcoOil and Barron Petroleum Business Records (Quantity: 31)		
Graham Office	Miscellaneous	1" Binders with ArcoOil and Barron Petroleum Business Records (Quantity: 4 (black) and 1 (lime green))		
Graham Office	Miscellaneous	2" Purple Binder		Labeled "Equipment List for Insurance"
Graham Office	Electronics	Acer Aspire Computer Tower	DTBEOAA00102100A964800	
Graham Office	Electronics	APC Backup Battery Surge (Back UPS-450)	9B1915A07847	
Graham Office	Electronics	Dell Laptop – Inspiron Model	CQ62DL2	
Graham Office	Electronics	Dell Power Edge T30 Server	CN-0642XY-WS200-87M-A0AJ	
Graham Office	Electronics	HPE Office Connect 1820 Series Switch	TW95GMZ35F	
Graham Office	Miscellaneous	Banker boxes with ArcoOil and Barron Petroleum Business records (Quantity: 10)		
Graham Office	Miscellaneous	Baskets with ArcoOil and Barron Petroleum Business Records (Quantity: 2 (lime green), 2 (dark green), 1 (gray))		
Graham Office	Miscellaneous	2" Aqua Binders (Quantity: 3)		Names on binders: (1) "Equip"; (2) "Timesheets"; (3) "January-December 2018 Bank Statements"

Graham Office	Miscellaneous Documents	1" Black Binder - "Leading Edge Energy LLC Jan-Dec 2018 Bank Statements"		
Graham Office	Miscellaneous Documents	1" Red Binders with ArcoOil and Barron Petroleum Business Records (quantity: 3)		Labeled: "Inventory-Electra"; "Texas Auto Repair Bank Statement"; and "Bank Statements"
Graham Office	Miscellaneous Documents	2" Pink Binder labeled "Dallas Resources Bank Statements"		
Graham Office	Electronics	Lenovo Ideacentre Computer Tower	MJ072JUZ	
Graham Office	Electronics	Lenovo Ideacentre Computer Tower	MJ0BAFDB	
Graham Office	Electronics	PNY Thumbdrive (Orange)	10.0.18362.1350	
Graham Office	Electronics	WD Elements Drive (Black)	WX81AB8E8DJL	
Graham Residence	Electronics	SDXC Card 64 GB		
Graham Residence	Electronics	San Disk Ultra 16 GB		
Graham Residence	Electronics	Old Blackberry (Silver)		
Graham Residence	Electronics	Old Samsung Cellphone	Model: SGH-1337M IMEI: 359367/05/535979/8 S/N: RV8G11BK2TE	Missing battery but appears to have SIM card
Graham Residence	Electronics	Old Iphone (silver)	Model: A1428 FCC ID: BCG-E2599A IMEI:013435008856208	No SIM card
Graham Residence	Electronics	Old Iphone		
Graham Residence	Electronics	Amazon Fire HD 6 Tablet (4th Gen.)	Model: PW98VM FCC ID: 2AB08 Serial Number: 00DA 0807 4464 0B2F	
Graham Residence	Electronics	Data Traveler 2GB Flash Drive		

Graham Residence	Jewelry	Rolex Watches (quantity: 2)		
Graham Residence	Collectibles	Brown wood box with Coin Collection		
Graham Residence	Jewelry	Versace sunglasses still in box		
Graham Residence	Jewelry	Gucci Sunglasses		
Graham Residence	Firearm	Gun (not yet identified)		
Graham Residence	Miscellaneous	Brown moving box full of ArcoOil, Barron Petroleum, and Sahota records		
Graham Residence	Electronics	San Disk Edge 8Gb		
Graham Residence	Electronics	Televisions and kitchen appliances		More detailed inventory in progress
Heartland FW Office	Miscellaneous	6 boxes and 9 white gifts bags of Heartland Group marketing materials		The materials include various pens, branded clothing, notebooks, framed images of wells and other marketing items
Heartland FW Office	Miscellaneous	2 key cards		
Heartland FW Office	Miscellaneous	Key ring with 6 keys on it		
Heartland FW Office	Electronics	Windows Surface Pro	Serial Number: 13274603353 Model Number: 1866 Mfg Year: 2020	Kristine
Heartland FW Office	Electronics	Windows Surface Pro	Serial Number: 33213293553 Model Number: 1866 Mfg Year: 2020	Kody
Heartland FW Office	Electronics	Computer	Serial Number: MCYB5P2KSWGNO11192100612 Model Number: AMD RYZEN 5	

Heartland FW Office	Electronics	Black Flash Drive	Model Number: CCAI16LP1210T7	
Heartland FW Office	Electronics	Windows Laptop	Serial Number: 64076593857 Model Number: 1873	Brunson; color: black; has power cord with it
Heartland FW Office	Electronics	ROG Rapture GT-AX11000 802.1 ax Tri-Band Gaming Router	n/a	
Heartland FW Office	Electronics	Iphone (black)		Kristine
Heartland FW Office	Electronics	Samsung Galaxy Note 10		Wes
Heartland FW Office	Electronics	Samsung Galaxy A10e	Model Number: SM-A102U Serial Number: RF8N102DERT IMEI: 3537 5611 1105 250	Heartland Phone
Heartland FW Office	Electronics	Samsung Galaxy Phone	IMIE: 353756111863320	Color: Blue
Heartland FW Office	Electronics	60" Samsung TV		
Heartland FW Office	Electronics	Office C: Computer Monitors (Quantity: 2)		
Heartland FW Office	Electronics	Office C: Wireless keyboard & mouse		
Heartland FW Office	Electronics	Office C: Printer HP Envy 7155		
Heartland FW Office (Brunson Materials)	Miscellaneous	Wells Fargo RSA SecureId Device (Quantity: 2)		
Heartland FW Office (Brunson Materials)	Miscellaneous	Blue folder with Guatemala Spanish documents		
Heartland FW Office (Brunson Materials)	Miscellaneous	1 banker's box full of Heartland business records		

Heartland FW Office (Brunson Materials)	Electronics	San Disk Ultra USB 3.0	BP2105581644 SDCZ48	Digitized Well logs - storage unit boxes and some analysis of behind pipe production Panther City Carson
Heartland FW Office (Brunson Materials)	Electronics	Miscellaneous power cords (quantity 3)		
Heartland FW Office (Brunson Materials)	Electronics	Windows wireless mouse		
Heartland FW Office (Heartland Office)	Furniture	Conference Table		
Heartland FW Office (Heartland Office)	Furniture	Set of drawers		
Heartland FW Office (Heartland Office)	Furniture	Leather Couch	Anteks Home Furnishings; Product ID: 0127755-8-1; 8888L10 VACCLO	
Heartland FW Office (Heartland Office)	Furniture	Coffee Table (Rectangle)		
Heartland FW Office (Heartland Office)	Furniture	Brown Leather Chairs (Quantity: 2)	Kiannah Arm Chair 53004859	
Heartland FW Office (Heartland Office)	Furniture	Side Table		Modern criss cross metal base w/ black stone top
Heartland FW Office (Heartland Office)	Furniture	Blue Conference Table Chairs (Quantity: 12)		
Heartland FW Office (Heartland Office)	Furniture	Tall gold lamps (Quantity:2)	E475958; Portable Luminaire No. Q 06631067	

Heartland FW Office (Heartland Office)	Furniture	Coffee Table (uneven piece of wood)	IF10274X	Original Price: \$199.99 (price tag still on it)
Heartland FW Office (Heartland Office)	Furniture	Black Leather Chairs (Quantity: 7)	Christopher Club Chair Black 53051230	
Heartland FW Office (Heartland Office)	Furniture	Rolling Office Chair with silver details	P.O. No.: 648777 SKU No: 217-988/25327110	
Heartland FW Office (Heartland Office)	Furniture	Black Rolling Office Chairs (Quantity: 5)	P.O. No: 922020101 Item No.: 51418/VN SKU No.: 1700724	
Heartland FW Office (Heartland Office)	Furniture	Gold table lamps (Quantity: 7)	43A19 15-4047	
Heartland FW Office (Heartland Office)	Furniture	Blue table lamps (Quantity: 2)	17-3487-1-5025-64	
Heartland FW Office (Heartland Office)	Furniture	Office B: Large Desk		
Heartland FW Office (Heartland Office)	Furniture	Office B: Drawer Filing Cabinet (Quantity: 2)		
Heartland FW Office (Heartland Office)	Furniture	Office C: Desk		
Heartland FW Office (Heartland Office)	Furniture	Office C: Bookshelf		
Heartland FW Office (Heartland Office)	Furniture	Office D: Desk		
Heartland FW Office (Heartland Office)	Electronics	Office D: Benq computer monitors (Quantity: 2)		
Heartland FW Office (Heartland Office)	Furniture	Office D: Bookshelf		

Heartland FW Office (Heartland Office)	Furniture	Office E: Round table		
Heartland FW Office (Heartland Office)	Electronics	Office E: Samsung TV		
Heartland FW Office (Heartland Office)	Furniture	Office E: bookshelf		
Heartland FW Office (Heartland Office)	Furniture	Office E: drawer filing cabinet (Quantity: 2)		
Heartland FW Office (Heartland Office)	Furniture	Office E: Gray Brown Chairs (Quantity: 2)		
Heartland FW Office (Heartland Office)	Appliances	Kitchen: Refrigerator		
Heartland FW Office (Heartland Office)	Electronics	Kitchen: Brother's printer		
Heartland FW Office (Heartland Office)	Electronics	Kitchen: Shredder		
Heartland FW Office (Heartland Office)	Furniture	Office F: Bookshelf		
Heartland FW Office (Heartland Office)	Furniture	Office F: Desk		
Heartland FW Office (Heartland Office)	Electronics	Office F: Speakers (quantity: 2)		
Heartland FW Office (Heartland Office)	Electronics	Office F: Benq Computer Monitors (quantity: 2)		
Heartland FW Office (Heartland Office)	Electronics	Office F: Wireless headphones		
Heartland FW Office	Electronics	Office F: Wireless keyboard and mouse		

(Heartland Office)				
Heartland FW Office (Heartland Office)	Electronics	Office F: Brother's printer HL-L23000		
Heartland FW Office (Heartland Office)	Furniture	Office G: Bookshelf		
Heartland FW Office (Heartland Office)	Furniture	Office G: Desk		
Heartland FW Office (Heartland Office)	Electronics	Office G: Benq Computer Monitors (Quantity: 2)		
Heartland FW Office (Heartland Office)	Electronics	Office G: Speakers (Quantity: 2)		
Heartland FW Office (Heartland Office)	Electronics	Office G: Wireless keyboard and mouse		
Heartland FW Office (Heartland Office)	Electronics	Office G: docking station		
Ikey Party	Electronics	Remarkable device with charger		
San Angelo Home	Electronics	Samsung tablet	359066091366276	Black
San Angelo Home	Electronics	Apple iPad	GG7VV06YHLJK	White/Silver
San Angelo Home	Electronics	Acer Aspire One small computer	LUSDJ0D14503481EF31601	Black
San Angelo Home	Electronics	Apple iPhone	352066062348821	White with pink case
San Angelo Home	Electronics	Samsung tablet	R9WN70YW2GJ	black
San Angelo Home	Electronics	Samsung tablet	R9WNC0ZCK0J	grey
San Angelo Home	Jewelry	Jewelry from wedding was a gift and the original cost is unknown		
San Angelo Home	Furniture	Family Room: Desk		
San Angelo Home	Furniture	Family Room: Exercise Bike		Purchased 2021

San Angelo Home	Furniture	Bedroom 1: Bed and Headboard		Purchased 2016
San Angelo Home	Furniture	Bedroom 1: Box spring and mattress		Purchased 2019
San Angelo Home	Furniture	Bedroom 1: Chests		Purchased 2016
San Angelo Home	Decorations	Bedroom 1: Blankets, quilts		Purchased 2010-2020
San Angelo Home	Decorations	Bedroom 1: Linens		Purchased 2010-2020
San Angelo Home	Furniture	Bedroom 2: Box Spring and mattress		Purchased 2019
San Angelo Home	Furniture	Bedroom 2: Dressers		Purchased 2016
San Angelo Home	Decorations	Bedroom 2: Blankets, quilts		Purchased 2010-2020
San Angelo Home	Decorations	Bedroom 2: Linens		Purchased 2010-2020
San Angelo Home	Decorations	Bathrooms: Shower Curtain (Quantity: 2)		
San Angelo Home	Decorations	Bathrooms: Bath Mat (Quantity: 3)		
San Angelo Home	Decorations	Bathrooms: Linens (Quantity: 3)		
San Angelo Home	Decorations	Bathrooms: Bath Sets (Quantity: 3)		
San Angelo Home	Decorations	Bathrooms: Medicine		
San Angelo Home	Decorations	Bathrooms: Hair dryers (Quantity: 2)		
San Angelo Home	Decorations	Bathrooms: Curling Irons (Quantity: 2)		
San Angelo Home	Decorations	Bathrooms: Razor		
San Angelo Home	Decorations	Bathrooms: Clothes Hampers (Quantity: 3)		
San Angelo Home	Decorations	Bathrooms: Scale		
San Angelo Home	Decorations	Bathrooms: Toiletries (Quantity: 3)		
San Angelo Home	Furniture	Home Office: Chair		Purchased 2019
San Angelo Home	Electronics	Sunny's Apple iPhone	Unknown	white with black otterbox case
San Angelo Home	Electronics	Samsung Galaxy	Unknown	black with sea foam green otterbox case
San Angelo Home	Furniture	Home Office: Table		

San Angelo Home	Appliances	Laundry Room: Washing Machine		Purchased 2019
San Angelo Home	Appliances	Laundry Room: Dryer		Purchased 2019
San Angelo Home	Appliances	Laundry Room: Iron		Purchased 2019
San Angelo Home	Furniture	Laundry Room: Ironing Board		Purchased 2019
San Angelo Home	Appliances	Laundry Room: Sewing Machine		Purchased 2019
San Angelo Home	Appliances	Laundry Room: Fan		Purchased 2019
San Angelo Home	Miscellaneous	Garage/Basement/Attic: Sports Equipment		Purchased 2017-2020
San Angelo Home	Miscellaneous	Garage/Basement/Attic: Toys and Games (Quantity: 4 boxes)		Purchased 2017-2020
San Angelo Home	Tools	Garage/Basement/Attic: Power and Hand tools (Quantity: 2 boxes)		Purchased 2010-2020
San Angelo Home	Tools	Garage/Basement/Attic: shovel		Purchased 2019
San Angelo Home	Tools	Garage/Basement/Attic: Spreaders		Purchased 2020
San Angelo Home	Tools	Garage/Basement/Attic: sprinklers/hoses (Quantity: 5)		Purchased 2010-2020
San Angelo Home	Tools	Garage/basement/attic : Garden tools and supplies (Quantity: 10)		Purchased 2010-2020
San Angelo Home	Decorations	Garage/basement/attic : Holiday Decorations (Quantity: 2)		Purchased 2010-2020
San Angelo Home	Tools	Garage/basement/attic : Ladder (Quantity: 10)		Purchased 2016
San Angelo Home	Furniture	Porch/Patio/deck: Chairs (Quantity: 2)		
San Angelo Home	Furniture	Porch/Patio/deck: Table		
San Angelo Home	Appliances	Porch/Patio/deck: Outdoor cooking equipment (Quantity: 2)		
San Angelo Home	Decorations	Porch/Patio/Deck: Plant/Planters (Quantity: 4)		
San Angelo Home	Appliances	Kitchen: Stove and range hood		Purchased 2019
San Angelo Home	Appliances	Kitchen: Microwave Oven		Purchased 2019

San Angelo Home	Appliances	Kitchen : Refrigerator		Purchased 2019
San Angelo Home	Appliances	Kitchen: Freezer		Purchased 2019
San Angelo Home	Appliances	Kitchen: Dishwasher		Purchased 2019
San Angelo Home	Appliances	Kitchen: Electrical Appliances (Quantity: 5)		Purchased 2019
San Angelo Home	Miscellaneous	Kitchen: Pots and Pans (Quantity: 20)		Purchased 2015-2020
San Angelo Home	Miscellaneous	Kitchen: Silverware (Quantity: 2)		Purchased 2015-2020
San Angelo Home	Miscellaneous	Kitchen: Kitchen Utensils (Quantity: 20)		Purchased 2015-2020
San Angelo Home	Miscellaneous	Kitchen: Dishes (Quantity: 40)		Purchased 2015-2020
San Angelo Home	Miscellaneous	Kitchen: Glasses (Quantity: 40)		Purchased 2015-2020
San Angelo Home	Miscellaneous	Kitchen: Liquor, wines (Quantity: 40)		Purchased 2015-2020
San Angelo Home	Furniture	Dining Room: Table		Purchased 2015
San Angelo Home	Furniture	Dining Room: Chairs (Quantity:6)		Purchased 2016
San Angelo Home	Furniture	Living Room: Sofa		Purchased 2019
San Angelo Home	Furniture	Living Room: Chair		Purchased 2019
San Angelo Home	Furniture	Gun Safe (Quantity: 1)		
San Angelo Home	Furniture	Living Room: Ottomans		Purchased 2019
San Angelo Home	Decorations	Living Room: Table Accessories		Purchased 2019
San Angelo Home	Decorations	Living Room: Clock		Purchased 2017
San Angelo Home	Decorations	Living Room: Mirror		Purchased 2017
San Angelo Home	Decorations	Living Room: Pillows (Quantity: 10)		Purchased 2019
San Angelo Home	Decorations	Living Room: Pictures, Decorations (Quantity: 5)		Purchased 2010-2020
San Angelo Home	Electronics	Samsung Galaxy	Unknown	Black with black otterbox case
San Angelo Home	Electronics	Samsung Galaxy	354904080530376	Blue
San Angelo Home	Electronics	Seagate Backup Plus Portable Drive	NA9SCH6Y	black

San Angelo Home	Electronics	Home Office: Computer		
San Angelo Home	Electronics	Home Office: Printer		
San Angelo Home	Electronics	Living Room Home Theater or Stereo		Purchased 2019
San Angelo Home	Electronics	Living Room: Gaming System		Purchased 2021
Graham Residence	Furniture	Kitchen - Table		
Graham Residence	Furniture	Kitchen - Chairs (Quantity: 4)		
Graham Residence	Appliances	Lighting Fixtures (Quantity: 2)		
Graham Residence	Appliances	Stove and Range Hood		
Graham Residence	Appliances	Microwave		
Graham Residence	Appliances	Refrigerator/Freezer		
Graham Residence	Appliances	Dishwasher		
Graham Residence	Miscellaneous	Pots and Pans (appx. 9)		
Graham Residence	Miscellaneous	Silverware (Mismatched set with appx 12 place settings)		
Graham Residence	Miscellaneous	Dishes (12 person set)		
Graham Residence	Miscellaneous	Wine (2 bottles)		
Graham Residence	Appliances	Vacuum Cleaner		
Graham Residence	Appliances	Toaster		
Graham Residence	Appliances	Air Fryer		
Graham Residence	Toy/Collectible	Car Figurines (Quantity: 12)		
Graham Residence	Toy/Collectible	Ducati Motorcycle Figurine		
Graham Residence	Toy/Collectible	Metal bike figurine		
Graham Residence	Miscellaneous	Teacup (Appx. 12)		
Graham Residence	Furniture	Living Room - Sofa (Quantity 2)		
Graham Residence	Furniture	Living Room - Recliner		

Graham Residence	Furniture	Living Room - Chairs (Quantity 3)		
Graham Residence	Furniture	Living Room - Coffee Table		
Graham Residence	Electronics	Living Room - Samsung TV		
Graham Residence	Miscellaneous	Living Room - Broom		
Graham Residence	Miscellaneous	Living Room - Men's shoes (1 pair)		
Graham Residence	Furniture	Bedroom 1- Twin Bed box spring and mattress		
Graham Residence	Furniture	Bedroom 1- Rolling Office Chairs (Quantity 3)		
Graham Residence	Miscellaneous	Various Men's Clothing		
Graham Residence	Miscellaneous	Bedroom 1 - Diving Gear (Quantity 3 sets)		
Graham Residence	Miscellaneous	Bedroom 1 - Boxes of paperwork and other (Quantity 2)		
Graham Residence	Furniture	Bedroom 2 - Queen box spring and mattress		
Graham Residence	Furniture	Bedroom 2 - Bedside Table		
Graham Residence	Electronics	Bedroom 2 - Philips TV		
Graham Residence	Miscellaneous	Bedroom 2 - Storage bin with miscellaneous personal belongings (Quantity 4)		
Graham Residence	Instrument	Bedroom 2 - Epiphone guitar		
Graham Residence	Miscellaneous	Bedroom 2 - Miscellaneous Men's clothing		
Graham Residence	Miscellaneous	Bedroom 2 Bathroom - Shower curtain		
Graham Residence	Miscellaneous	Bedroom 2 Bathroom - Blow Dryer		
Graham Residence	Miscellaneous	Bedroom 2 Bathroom - Mirror		
Graham Residence	Furniture	Master Bedroom - King box spring and mattress		
Graham Residence	Furniture	Master Bedroom - Bedside Table		
Graham Residence	Miscellaneous	Master Bedroom - Storage Bin		

Graham Residence	Miscellaneous	Master Bedroom - 1 bottle of 1.75 L Bombay Sapphire		
Graham Residence	Electronics	Master Bedroom - LG Television		
Graham Residence	Furniture	Bedroom 3 - Queen box spring and mattress (Quantity 2)		
Graham Residence	Electronics	Bedroom 3 - Onn TV		
Graham Residence	Miscellaneous	Bedroom 3 - Miscellaneous Men's clothing		
Graham Residence	Miscellaneous	Bedroom 3 - MSA Explosimeter		
Graham Residence	Miscellaneous	Bedroom 3 Bathroom - Towels		
Graham Residence	Miscellaneous	Bedroom 3 Bathroom - Shower curtain		
Graham Residence	Furniture	Master Bathroom - Cabinet		
Graham Residence	Miscellaneous	Master Bathroom - Shower Curtain		
Graham Residence	Miscellaneous	Master Bathroom - Miscellaneous Men's clothing		
Graham Residence	Miscellaneous	Master Bathroom - Storage Box		
Graham Residence	Miscellaneous	Master Bathroom - Laundry Hamper		
Graham Residence	Miscellaneous	Master Bathroom - Set of Towels		
Graham Residence	Appliances	Washing Machine (Whirlpool)		
Graham Residence	Appliances	Dryer (Whirlpool)		
Graham Residence	Furniture	Cabinet		
Graham Residence	Electronics	Balcony - Vizio TV		
Graham Residence	Furniture	Balcony - Folding Chair		
Graham Residence	Furniture	Front Porch - Outdoor table and chair set (1 table/2 chairs)		
Graham Residence	Miscellaneous	Upstairs Linen Closet - Extra Bedding		
Graham Residence	Tool	Upstairs Linen Closet - Vacuum		

Graham Office	Electronics	HP Color Laser Jet Pro MFP M281fdw		
Graham Office	Electronics	Fax Machine - ES-500WR		
Graham Office	Miscellaneous	Office Supplies		
Graham Office	Furniture	Desks (Quantity 7)		
Graham Office	Electronics	Dell Computer Monitors (Quantity 2) plus keyboard		
Graham Office	Electronics	Yealink phone (Quantity 4)		
Graham Office	Decoration	Metal Welcome Oil Rig Sign on Wall		
Graham Office	Furniture	Large wooden cabinet filled with office supplies		
Graham Office	Furniture	Rolling Office Chair (Quantity 6)		
Graham Office	Furniture	4 drawer beige filing cabinets (Quantity 2)		
Graham Office	Furniture/Appliance	Indoor Electric Fireplace (Quantity 2)		
Graham Office	Electronics	Vtech Phone		
Graham Office	Office Equipment	Printer - HP Laser Jet Pro M404n		
Graham Office	Electronics	Computer Monitor (Quantity 2)		
Graham Office	Office Equipment	Logitech keyboard (quantity 1)		
Graham Office	Furniture	Black 2 drawer filing cabinet (Quantity 2)		
Graham Office	Furniture	Bathroom Cabinet		
Graham Office	Appliances	Refrigerator/Freezer		
Graham Office	Appliances	Keurig		
Graham Office	Furniture	Dining Chairs (Quantity 2)		
Graham Office	Appliances	Microwave (Frigidaire)		
Graham Office	Office Equipment	HP Photosmart Printer		
Graham Office	Appliances	Water Dispenser		
Graham Office	Office Equipment	Presentation Board		
Graham Office	Furniture	Locking 4 drawer filing cabinet (Quantity 2)		

Graham Office	Furniture	Black 4drawer filing cabinet		
Graham Office	Furniture	Black 3 drawer filing cabinet (Quantity 3)		
Graham Office	Furniture	Bookshelf (Quantity 2		
Graham Office	Furniture	Cabinet with two drawers		
Graham Office	Furniture	Gray/Beige 4 drawer filing cabinet (Quantity 3)		
Graham Office	Electronics	Samsung Computer monitors (Quantity 4)		
Graham Office	Office Equipment	Logitech wireless keyboard and mouse (quantity 2)		
Graham Office	Electronics	Epson ES-500WR		
Graham Office	Electronics	Printer MFC -L 8900 CDW		
Graham Office	Furniture	Extra wide beige 4 drawer filing cabinet		
Graham Office	Furniture	Leather Arm Chair		
Graham Office	Furniture	Brown 3 drawer filing cabinet		
Graham Office	Electronics	Brother Printer MFC-934OCDW		
Graham Office	Office Equipment	Cabinet full of old landline phones		
Graham Office	Office Equipment	Ativa Shredder		
Graham Office	Office Equipment	Swingline 67 Electric Stapler		

**EXHIBIT B: PROPOSED ORDER**

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. §

No. 4:21-cv-1310-O-BP

**ORDER GOVERNING THE PROCEDURES FOR THE  
SALES OR ABANDONMENT OF PERSONAL PROPERTY**

The Receiver's Motion for Order Governing the Procedures for the Sales or Abandonment of Personal Property and Brief in Support [ (the "Motion")<sup>1</sup> having been considered by the Court, and the Court having noted the pleadings on file, the Court finds the Motion is well taken and should be **GRANTED**.

**THEREFORE, IT IS HEREBY ORDERED** as follows:

**PROCEDURES GOVERNING DISPOSITION OF PERSONAL PROPERTY**

**A. Private Sale.**

1. The Receiver is hereby authorized to sell Personal Property constituting Receivership Assets that may exceed \$1,000 in value ("Personal Property"), in any manner outlined below, and is further authorized to determine which method to use in selling any particular item of Personal Property. Furthermore, the Receiver is authorized to use her discretion in abandoning or selling Personal Property valued at less than \$1,000, without further notice to the Court, but shall include a list of all such property sold or abandoned in appropriate periodic reports and in her final report. None of the parties to this Case or the Receiver, her agents, assigns, or employees may purchase any of the Personal Property.

2. The Receiver shall sell Personal Property at a private sale conducted by the Receiver or her staff or agents at which the property will be offered for sale at a specific asking price, as determined by the Receiver. The Receiver shall set the sales price by determining value from any reputable source, such as a trade journal, appraisal, or comparable sales on public auction sites such as eBay. The Receiver may also set a reserve price which may, in the Receiver's sole

---

<sup>1</sup> Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Receivership Order, as applicable.

discretion, be made public by the Receiver. The Personal Property need not be sold for the asking price but may be sold at any price at or above the reserve price.

3. The Receiver shall conduct the private sale in a location and provide such advertising as in the opinion of the Receiver is appropriate, if any, given the nature and condition of the property to be sold. Sales of certain intangible property, if any, will also be sold in accordance with any specific limitations or rules imposed by any applicable governing body.

4. The Receiver shall file with the Court and post to the Receivership website, [www.heartlandreceivership.com](http://www.heartlandreceivership.com), notice of the terms of the sale at least seven (7) days before transferring title, possession, or other indicia of ownership in the property (the “Notice Date”). If no bids exceeding the notice sale amount by at least 10% are received within seven (7) days of the Notice Date, the Receiver may thereafter finalize the sale and transfer possession and ownership of the property pursuant to the sale’s terms.

5. The Receiver shall pay from the Receivership Assets all reasonable and customary costs incurred in connection with the sale, without necessity of obtaining this Court’s further authorization.

**B. Auction.**

6. In lieu of, or in addition to, a private sale, the Receiver is hereby authorized to liquidate at a public auction the Personal Property in the Receiver’s possession, in accordance with the following procedures:

7. The Receiver shall determine, in her discretion, which Personal Property should be sold by auction so as to obtain the highest net return on the Personal Property. The Receiver shall sell the Personal Property to the highest bidder at a public auction conducted by an established auctioneer or on a virtual platform, including e-Bay and other similar platforms. The Receiver

shall provide such advertising, if any, as in the opinion of the Receiver is appropriate given the nature and condition of the property to be sold.

8. The Receiver shall pay from the Receivership Assets all reasonable and customary costs incurred in connection with the auction including any commissions.

9. Notice of the terms of the sale need not be included in the Receiver's periodic reports to the Court, although net proceeds received from any auction and a general description of the Personal Property sold by auction should be reported.

**C. Abandonment.**

10. In the event the Receiver is unable to sell an item of Personal Property under the procedures described herein, or determines that an item of Personal Property has an appraised or estimated value of less than \$1,000, the Receiver is hereby authorized to dispose of the item by either a direct negotiated sale, donation to charity, or destruction. The Receiver may abandon the asset without notice and without further order of this Court. If the Receiver holds an interest as a lessee, or if the Personal Property is subject to a lien approximately equal to or in excess of the fair market value the Receiver would net from a sale of the Personal Property, the Receiver may surrender the property to the lessor or creditor in exchange for the return of any deposits or other consideration for the value, if any, of the interest held by the Receiver.

**D. Notice of Intended Disposition.**

11. Notice of a sale, auction, abandonment, or other disposition (collectively, the "Disposition") of Personal Property under the above procedure shall be provided as follows:

12. The Receiver shall file a written notice of the intended Disposition of the item of Personal Property valued above \$1,000<sup>2</sup> and post that notice on the Receivership website, [www.heartlandreceivership.com](http://www.heartlandreceivership.com). The notice shall describe the property to be disposed of, the manner of Disposition (*e.g.*, abandoned, sold, auctioned), and if applicable, its sales price.

13. The Receiver will also serve by first class U.S. mail, the written Notice described above on every person who has made a written request to the Receiver. The Receiver may in her discretion provide additional notice as she deems appropriate.

14. Any person who wishes to object to the proposed Disposition, shall file a written response with this Court setting forth the objection (or a claim of ownership or interest in Personal Property, identifying the source of your claim) and shall file and serve the response on the Receiver not less than ten (10) calendar days of the date the Notice is filed with the Court. The objection or claim must state why the proposed Disposition should not be approved by the Court and the basis for such belief (an “Objection”). The Receiver may request an expedited hearing on any Objection.

15. If no Objection is timely filed and served, the Receiver may dispose of the property in the manner described in the Notice without further order of the Court in accordance with these procedures and as described in the Notice.

16. If an Objection is timely filed and served, the proposed Disposition shall not be completed until the Objection has been ruled upon by the Court.

17. The Receiver’s reply to an Objection to the proposed Disposition shall be filed within five (5) business days of the Objection’s filing.

---

<sup>2</sup> To avoid the time and cost in describing property with little or no value, such as many items at the Receivership Properties, including, but not limited, to the AOS Office, CubeSmart, and the Graham residence, the Court authorizes the Receiver to abandon any item valued at less than \$1,000 without providing notice prior to the abandonment.

18. The Court may thereafter determine, with or without a hearing, whether to (i) approve the Disposition, (ii) overrule an Objection, or (iii) sustain an Objection.

19. If no Objection is filed, or if the Court approves the Disposition subsequent to the filing of an Objection, the Receiver's sales of the Personal Property shall be free and clear of all liens, claims, interests, and encumbrances, unless the Court orders that such liens, claims, interests, or encumbrances shall attach to any sale proceeds.

20. Additionally, any person may submit to the Court a written offer for the Personal Property the Receiver seeks to dispose. If the offer is submitted to the Court within seven (7) calendar days from the date the Notice of Disposition is filed and is at least 10% greater than the amount of any sale included in the Notice, the person submitting the increased offer shall be entitled to purchase the property described in the Notice, without further order of the Court.

**E. Execution of Certificates of Title.**

21. The Receiver is hereby authorized to execute certificates of title and other documents as may be necessary to effectuate the transfer of title to Personal Property sold, abandoned, surrendered, auctioned, or disposed of in any other manner pursuant to the procedure approved herein.

**IT IS SO ORDERED.**

Signed this \_\_\_ day of \_\_\_\_\_, 2022

\_\_\_\_\_  
HAL R. RAY, JR.  
UNITED STATES MAGISTRATE JUDGE

Prepared and submitted by:

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  
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**