

UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 FORT WORTH DIVISION

UNITED STATES SECURITIES AND  
 EXCHANGE COMMISSION,

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*Plaintiff,*

v.

CIVIL ACTION NO. 4-21CV-13100

THE HEARTLAND GROUP  
 VENTURES, LLC, et al.,

*Defendants,*

and

DODSON PRARIE OIL & GAS LLC, et  
 al.

*Relief Defendants.*

**MOTION TO LIFT TRAVEL RESTRICTIONS  
AS TO DEFENDANT ROGER SAHOTA**

Defendant Manjit “Roger” Sahota (“Sahota”) moves the Court to lift the travel restrictions imposed against me in the Temporary Restraining Order and Other Emergency Relief (“TRO”) entered on December 2, 2021. (Docket 12). I make this request so that I can pursue potential business opportunities for myself and my family.

1. I have been prohibited from traveling outside of the country since December 2021 when this action began. The TRO states: “Defendant Manjit Singh “Roger” Sahota is prohibited from traveling outside the United States unless and until this Court finds that he, as well as any and all Defendants and Relief Defendants over which he maintains or maintained or exercised or exercises control, has fully complied with the provisions of this Order.”

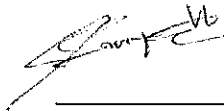
2. On December 10, 2021, I agreed (without admitting or denying any wrongdoing) to the entry of a preliminary injunction against me. (Docket 44). And on May 10, 2022, I agreed (without admitting or denying any wrongdoing) to the entry of a Judgment against me with respect to liability as alleged in the Complaint. (Docket 194). The travel restrictions set forth in the TRO were not included in the Preliminary Injunction or the Judgment regarding liability.

3. Throughout this proceeding, I have substantially complied with the TRO. I have (a) made myself available to the Receiver and have provided information to the Receiver to the best of my ability, and (b) provided an accounting of the funds we received from Heartland in our Motion to Terminate or Modify the Asset Freeze and Receivership Orders (May 14, 2022). At present, I believe the Receiver has secured substantially all of my personal and corporate assets.

4. I am a citizen of Canada and I have potential business opportunities that I would like to explore in Canada in the very near future. Because of the Asset Freeze entered against me at the beginning of this case, I have not had access to any funds to pay for ordinary living expenses or legal fees. Lifting the travel restrictions would be of great benefit to me and my family.

For the reasons stated herein, I respectfully request the Court to enter an order lifting the travel restrictions against me.

Respectfully,



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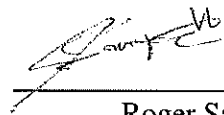
Manjit Singh (Roger) Sahota (Defendant)  
12642 Raspberry Lane  
San Angelo, Texas 76904

**Certificate of Conference**

My former counsel, Kevin Edmundson, left a voice mail message with counsel for the SEC on May 27, 2002 in an attempt to confer on this motion. SEC counsel did not return the phone call.

**Certificate of Service**

I certify that on June 2, 2022, I sent by electronic mail a true and correct copy of the foregoing to all parties of record.



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Roger Sahota