



(*Id.*, § X(D)) Thus, the travel restrictions – contained in Section VII of the Order – did not expire on December 16, and remain operative.

In his Motion to Lift Travel Restrictions (“Motion”), Sahota argues that the Court should lift the travel restriction because he has “substantially complied with the TRO.” (ECF No. 211, ¶ 3)

On the contrary, Sahota has mostly *ignored* the Court’s Order. Consider:

- The Court ordered Sahota to surrender his passport to the Clerk of the Court. (*Id.*, § VII(A)) He never did so.
- The Court ordered Sahota to repatriate his offshore assets, and to provide the Court with a written description of all such assets. (*Id.*, § VI) He never did so.
- The Court ordered Sahota to provide a “sworn, interim accounting, under oath” of his assets and accounts within five days of the Order. (*Id.*, § XIII) He never did so.<sup>1</sup>
- The Court ordered Sahota to immediately 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.” (ECF No. 14, ¶ H) He never did so.

Fortunately, it’s not too late for Sahota to help the Receivership in three tangible ways:

---

<sup>1</sup> Sahota claims to have provided the Court with an accounting as part of his motion to terminate or modify the asset freeze. (ECF No. 130) Sahota filed the brief in support of that motion more than *10 weeks after* this Court entered the Order. The Order required him to file his sworn accounting within *five days of its issuance*. (ECF No. 12, § XIII) More importantly, that brief contains almost none of the information required by the Court as part of the accounting. *Compare* ECF No. 12, § XIII (setting forth what Sahota must include in the interim accounting) *with* ECF No. 130 (Sahota’s submission that he claims includes the required accounting).

1. Sahota should transfer to the Receiver title to the *Bahama properties* that he bought with funds of entities now administered by the Receiver, as discussed in **Section A** below.
2. Sahota should transfer title to the Receiver of several *vehicles* that this Court has already authorized the Receiver to sell (**Section B**).
3. Sahota should provide the Receiver with the “Bitlocker Recovery Key” or password for *four computers* (**Section C**).

Once Sahota has done so, the SEC will support lifting the travel restrictions.

**A. The Bahama Properties**

There are at least two properties in the Bahamas owned or controlled by Sahota, and perhaps an option on a third. ArcoOil Corp. and Barron Petroleum LLC, once controlled by Sahota and now overseen by the Receiver, spent about \$1.9 million to buy the properties, using at least \$640,000 of Heartland’s money to do so. (*See* Ex. 1 attached hereto, Declaration of Rebecca Hollenbeck, ¶¶ 9 - 9(d))

The Receiver has requested that Sahota help effectuate transfer of control and title of the Bahamian real estate to the Receiver. Thus far, Sahota has been uncooperative.

**B. The Vehicles**

Sahota bought several vehicles with the funds of Receivership Parties, including Dallas Resources Inc. (Ex. 1 hereto, Hollenbeck Decl., ¶ 10) The Court has already authorized the sale of at least one of those vehicles. (ECF No. 124) Many of the vehicles are titled to Sahota himself. *See, e.g.*, ECF No. 219, Ex. A (listing vehicles). The Receiver, through her counsel, has asked Sahota to assign title of the vehicles to the Receivership. To date, Sahota has not done so. Until he does, the Receiver cannot sell the vehicles.

**C. The Laptops**

The Receivership is in possession of four tablets or laptops, belonging to Receivership Parties, which are inaccessible because the Receiver lacks the password or “Bitlocker Recovery Key” to unlock them. These include three Microsoft Surface tablets that the Receiver found at the Eldorado ranch, and an Apple MacBook Pro laptop that the Receiver found at Sahota’s San Angelo residence. Receivership Party Dallas Resources owned both properties. Sahota apparently used at least two of the tablets. He has represented that his son, Relief Defendant Monroe Sahota, owned the laptop, while his other son, Relief Defendant Sunny Sahota, owned the third tablet.

\* \* \*

The SEC proposes that the Court order Sahota to provide such assistance by a date certain, after which the Receiver will submit a status report. If the Receiver reports that Sahota has provided the assistance sought above, the SEC is prepared to agree to the relief sought in the Motion. Unless he does so, however, the SEC opposes the Motion for the reasons set forth herein, and asks that Sahota be directed to fully adhere to the operative portions of the Order.

Dated: June 23, 2022

Respectfully submitted,

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION**

By: /s/ Jonathan S. Polish  
Jonathan S. Polish

Jonathan S. Polish (IL Bar No. 6237890)  
Stephanie L. Reinhart (IL Bar No. 6287179)

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION**

175 W. Jackson Blvd., Suite 1450

Chicago, Illinois 60604

(312) 353-6884 (Polish)

PolishJ@SEC.gov

(312) 886-9899 (Reinhart)

ReinhartS@SEC.gov

Keefe Bernstein (Texas Bar No. 24006839)

**UNITED STATES SECURITIES**

**AND EXCHANGE COMMISSION**

801 Cherry Street, Suite 1900

Fort Worth, Texas 76102

(817) 900-2607

BernsteinK@sec.gov

# EXHIBIT 1



connection with this assignment, I have reviewed the SEC's files concerning the offer and sale of Heartland securities by certain of the defendants in this matter, including Heartland Production and Recovery LLC, Heartland Production and Recovery Fund LLC, Heartland Production and Recovery Fund II LLC, The Heartland Group Ventures, LLC, Heartland Drilling Fund I, LP, The Heartland Group Fund III, LLC, and Carson Oil Field Development Fund II, LP (whom I collectively refer to herein as "Heartland Defendants"), and their use of investor funds. I have also reviewed documents concerning the use of investor funds by other defendants in this matter, including defendant Manjit Singh ("Roger") Sahota, related Defendants in this matter ArcoOil Corp. ("ArcoOil") and Barron Petroleum LLC ("Barron Petroleum"), and documents concerning the use of investor funds by related Relief Defendants in this matter Barron Energy Corp., Dallas Resources Inc. ("Dallas Resources"), Leading Edge Energy LLC, Sahota Capital LLC, and 1178137 B.C. Ltd. (collectively the "Sahota Relief Defendants"). The files I have reviewed include, among other things, records from various banks obtained during the investigation and pending litigation, including bank records pertaining to the Heartland Defendants, Sahota-related Defendants ArcoOil Corp. and Barron Petroleum LLC, and the Sahota Relief Defendants; documents produced by the court-appointed Receiver in this matter, various defendants in this matter, and third parties; and additional documents obtained by the SEC during the course of its investigation and pending litigation in this matter.

4. Based upon my review of the information described in paragraph 3, I am informed and believe, and therefore state, the information set forth below.

**A. BANK ACCOUNTS**

5. Since October 1, 2018, the Sahota Defendants have opened and/or used at least five bank accounts, including the following:

- a. ArcoOil Corp. bank account x5581 at JP Morgan Chase Bank, opened August 2017; prior to the Court's appointment of a Receiver over ArcoOil Corp., Mandeep Kaur Sahota, Harprit Sahota, and Monroe Sahota had signatory authority over the account.
  - b. ArcoOil Corp. bank account x4116 at Bank of Jackson Hole, opened June 2021; prior to the Court's appointment of a Receiver over ArcoOil Corp., Manjit Singh Sahota, Monroe Sahota, and Sunny Sahota had signatory authority over the account.
  - c. Barron Petroleum LLC bank account x6891 at Wells Fargo Bank, opened February 2019; prior to the Court's appointment of a Receiver over Barron Petroleum LLC, Sunny Sahota had signatory authority over the account.
  - d. Barron Petroleum LLC bank account x0550 at First State Bank; opened August 2020; prior to the Court's appointment of a Receiver over Barron Petroleum LLC, Manjit Singh Sahota had signatory authority over the account.
  - e. Barron Petroleum LLC bank account x4132 at Bank of Jackson Hole, opened June 2021; prior to the Court's appointment of a Receiver over Barron Petroleum LLC, Manjit Singh Sahota, Monroe Sahota, and Sunny Sahota had signatory authority over the account.
6. Since October 1, 2018, the Sahota Relief Defendants have opened and used at least ten bank accounts, including the following:
- a. Barron Energy Corp. bank account x4815 at Wells Fargo Bank, opened June 2021; prior to the Court's appointment of a Receiver over Barron Energy Corp., Sunny Sahota, Manjit Sahota, and Monroe Sahota had signatory authority over the account.
  - b. Barron Energy Corp. bank account x4108 at Bank of Jackson Hole, opened June 2021; prior to the Court's appointment of a Receiver over Barron Energy Corp., Manjit Singh Sahota, Monroe Sahota, and Sunny Sahota had signatory authority over the account.
  - c. Dallas Resources Inc. bank account x3910 at Wells Fargo Bank, opened September 2018; prior to the Court's appointment of a Receiver over Dallas Resources Inc., Harprit Sahota and Sunny Sahota had signatory authority over the account.
  - d. Dallas Resources Inc. bank account x8283 at Wells Fargo Bank, opened September 2018; prior to the Court's appointment of a Receiver over Dallas Resources Inc., Harprit Sahota and Sunny Sahota had signatory authority over the account.

- e. Dallas Resources Inc. bank account x4140 at Bank of Jackson Hole, opened June 2021; prior to the Court's appointment of a Receiver over Dallas Resources Inc., Manjit Singh Sahota, Monroe Sahota, and Sunny Sahota had signatory authority over the account.
- f. Leading Edge Energy LLC bank account x8608 at JP Morgan Chase Bank, opened April 2017; prior to the Court's appointment of a Receiver over Leading Edge Energy LLC, Mandeep Kaur Sahota and an individual with the initials B.L. had signatory authority over the account.
- g. Sahota Capital Corp. bank account x4124 at Bank of Jackson Hole, opened June 2021; prior to the Court's appointment of a Receiver over Sahota Capital Corp., Manjit Singh Sahota, Monroe Sahota, and Sunny Sahota had signatory authority over the account.
- h. Sahota Capital Corp. bank account x2033 at First Financial Bank, opened June 2021; prior to the Court's appointment of a Receiver over Sahota Capital Corp., Manjit Sahota and Sunny Sahota had signatory authority over the account.
- i. 1178137 B.C. LTD bank account x9049 at Toronto Dominion Bank, opened September 2018 and closed July 2021. Monraaj Sahota and an individual with the initials G.S. had signatory authority over the account.
- j. 1178137 B.C. LTD bank account x1119 at Toronto Dominion Bank, opened September 2018 and closed August 2020. Monraaj Sahota and an individual with the initials G.S. had signatory authority over the account.

**B. HEARTLAND DEFENDANTS' PAYMENTS TO SAHOTA-RELATED DEFENDANTS ARCOIL CORP. AND BARRON PETROLEUM LLC AND RELIEF DEFENDANT DALLAS RESOURCES INC.**

7. From February 2019 to September 2021, the Heartland Defendants made approximately \$54.4 million in payments to bank accounts held by Sahota-related Defendants ArcoOil Corp. and Barron Petroleum LLC and to Sahota Relief Defendant Dallas Resources Inc., all of which are Receivership entities (see Order Appointing Receiver at ECF 17). Those payments are as follows:

- a. From July 2019 to September 2021, the Heartland Defendants made approximately **\$43.8 million** in payments to the **Barron Petroleum LLC** bank account x6891 at Wells Fargo Bank.
- b. From February 2019 to June 2019, the Heartland Defendants made approximately **\$10.6 million** in payments to the **Dallas Resources Inc.**

bank account x3910 at Wells Fargo Bank, or to Dallas Resources through payments to a law firm that held the funds in escrow before transferring them to Dallas Resources.

- c. From October 2019 to February 2020, the Heartland Defendants made approximately **\$37,000** in payments to the **ArcoOil Corp.** bank account x5581 at JP Morgan Chase Bank.

**C. USE OF FUNDS BY THE SAHOTA-RELATED DEFENDANTS ARCOOIL CORP. AND BARRON PETROLEUM INC. AND RELIEF DEFENDANT DALLAS RESOURCES INC.**

8. Between February 2019 and September 2021, the bank accounts of Sahota-related Defendants ArcoOil Corp. and Barron Petroleum LLC and Relief Defendant Dallas Resources Inc., all of which are now Receivership entities (see Order Appointing Receiver at ECF 17), received approximately \$54.4 million from the Heartland Defendants, representing approximately 80% of all funds received by those Sahota-related accounts between February 2019 and September 2021.

**Bahamas-related expenditures**

9. Based on my review of bank records of the Sahota-related Defendants ArcoOil Corp. and Barron Petroleum LLC, those entities used funds transferred from the Heartland Defendants for, among other things, expenditures related to real estate in the Bahamas that they would have been unable to make without Heartland funds according to my analysis of the bank record activity. Those transfers include:

- a. On May 19, 2020, ArcoOil Corp. account x5881 at JP Morgan Chase Bank wired **\$267,750.25** to third party Alexiou Knowles and Co. in Nassau, Bahamas. The wire details of that transaction state “CAT ISLAND BUTLER TRACT DOWN PAYMENT.”
- b. On December 23, 2020, ArcoOil Corp. account x5881 at JP Morgan Chase Bank wired **\$87,011.25** to third party Alexiou Knowles and Co. in Nassau, Bahamas. The wire details of that transaction state “CAT ISLAND SALTY BLUE HOUSE .4 ACRE DEPOSIT.”

- c. On January 8, 2021, ArcoOil Corp. account x5881 at JP Morgan Chase Bank wired **\$99,710.75** to third party Alexiou Knowles and Co. in Nassau, Bahamas. The wire details of that transaction state “9 ACRE DEPOSIT/RETAINER AND WAYPOINT EIA INVOICE 247 REAL ESTATE PURCHASE.”
- d. On March 18, 2021 and March 23, 2021, Barron Petroleum LLC account x0550 at First State Bank wired **\$778,512** and **\$640,123.40**, respectively, to third party Alexiou Knowles and Co. in Nassau, Bahamas. The wire details of those transactions state “Purchase of Salty Blue House (Buying a home)” and “Dallas Purchase of 9 Acre House,” respectively. Of the total approximately \$1.4 million of these two wires, approximately \$641,000 was funded with Heartland monies received from Dallas Resources Inc. bank account x3910 at Wells Fargo Bank on March 12, 2021 and March 19, 2021.

**Automobile-related expenditures**

10. Based on my review of bank records of Sahota-related Relief Defendant Dallas Resources Inc., that entity used funds for, among other things, automobile-related expenditures. These include the following: on March 15, 2019, Dallas Resources Inc. account x3910 at Wells Fargo Bank wired approximately **\$77,360** to IronPlanet Inc. The wire details state “Memo **2039362** 1972911 2039363 2039339 2079665 1968560 2079666” (bolding added to original). Based on my review of documents provided by the court-appointed Receiver in the pending litigation, Item **2039362** appears to be a 2014 Ford F-250 Super Duty 4x4 Extended Cab Pickup with VIN number 1FT7X2B69EEA98009.

I, Rebecca Hollenbeck, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on the 23rd day of June 2022.

  
\_\_\_\_\_

Rebecca Hollenbeck

**CERTIFICATE OF SERVICE**

On June 23, 2022, I electronically filed the foregoing document with the clerk of court for this U.S. District Court using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. I have further emailed this filing to *pro se* defendants James Ikey at [James.ikeyrcg@gmail.com](mailto:James.ikeyrcg@gmail.com) and Roger Sahota at [RogerSahota207@gmail.com](mailto:RogerSahota207@gmail.com).

/s/ Jonathan S. Polish