

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION NO. 4-21CV-13100
	§	
THE HEARTLAND GROUP VENTURES, LLC, et al.,	§	
	§	
<i>Defendants,</i>	§	
	§	
and	§	
	§	
DODSON PRARIE OIL & GAS LLC, et al.	§	
	§	
<i>Relief Defendants.</i>	§	
	§	

**ROGER SAHOTA DEFENDANT RESPONSE TO PLAINTIFF’S RESPONSE TO LIFT
TRAVEL RESTICTION ORDERS AS TO ROGER SAHOTA DEFENDANT**

Defendant Manjit “Roger” Sahota (the “Sahota Defendant”) move to terminate the Travel ban Orders entered in this case against me. As Court understands that all the assets SEC was seeking from the Defendant were turned over to the Receiver. Defendants need to travel to do business for his family.

SEC’s Response is basically false and Racially Motivated allegations.

In the contrary Roger Sahota has complied with all Court’s orders.

Roger Sahota’s Response to Plaintiff’s Objections:

1. Roger Sahota is a Canadian Citizen and hold a Canadian Passport, Roger Sahota needs that passport to travel within USA to look for work and business to provide for his family.

2. Roger Sahota do not own any offshore bank accounts or assets including Bahamas.
3. The Receiver has possession of all accounting of Sahota business when they took possession of all computers and documents from the Graham office. The banks listed in the TRO have closed all accounts of all Sahota defendants including business or personal accounts and receiver got all the funds.
4. When Receiver served Sahota's with Court Documents all the vehicles were in the yards or in the leases and Sahota's were locked out of those properties, as of today receiver have control of all vehicles. The Receiver has possession of all titles to those vehicles when they took possession of documents from the Graham office and Eldorado ranch.
5. Receivers have all Sahota's laptops and cell phones even ones Sahota's owned prior to SEC's racially motivated and fraud case.
6. Receivers have control of all trucks owned by Sahota's companies.
7. Roger Sahota does not know what is Bitlocker Recovery Key is.
8. Roger Sahota does not own any brokerage accounts and retirement accounts. Roger Sahota only had one bank account in Eldorado, Texas Bank and receiver froze that account and took all the funds from that account.
9. Sahota Defendants provide Court with accounting of the businesses in Sunny Sahota's Declaration. Roger Sahota has been working in USA and Canada since 1974, all the money he and his family earned/saved over the last 47 years, SEC and Receiver took all that money and assets which had nothing to do with Heartland funds. As SEC admitted in their complaint under perjury of penalty that Sahota's had around \$14 million funds (As admitted by SEC's own Complaint under perjury of penalty) which did not belong to Heartland instead SEC and Receiver took those funds from Sahota's. SEC and Receiver

also took Assets that Sahota owned before Sahota's met Heartland which included one house in Graham, Office and Yard in Graham, office, and Yard in Electra, Texas and over 195 oil and gas wells in Wichita, Jack, Stephens, Palo Pinto and Val Verde Counties. Sahota's owned drilling rigs, pickup trucks, heavy trucks, dozers, backhoes, trailers, work over rigs and lots of other equipment Sahota's owned before Heartland met Sahota's.

Heartland raised funds from investors without the knowledge of Sahota's for years before they ever met Sahota's. Why have Sahota's been unfairly target in this matter? Why were the assets owned by Sahota's before Heartland met Sahota's and \$14 million (As admitted by SEC's own Complaint under perjury of penalty) were taken from Sahota's, may be just for no reason or this case is racially motivated against an immigrant family because all Heartland owners are white people. None of Heartland's owner's houses were taken away by SEC or the Receiver. Receiver even wants us to leave our personal belongings in the houses we are living in.

Sahota's think this is overreach of SEC and Receiver to loot the Sahota's out of all assets which were purchased before Heartland and \$ 14 million (As admitted by SEC's own Complaint under perjury of penalty) that has nothing to do with Heartland funds. Sahota's respectfully ask the Court to Order SEC and Receiver to return all those assets and funds back to Sahota's. Sahota's believe SEC and Receivers case against Sahota's is Racially Motived because Roger Sahota is an Immigrant from a third world county.

Before Sahota's met Heartland, Sahota's owned their own business, house, oil and gas business and around 30 employees worked for the Sahota's. That was all taken by SEC because Sahota's are from foreigners, but nothing was taken from Heartland owners because they are all white people.

Heartland raised \$122 million dollars, Heartland paid \$54 million to Sahota's Companies to purchase oil and gas assets, drilling expenses and gas line construction. What happened to the balance of \$68 million that Heartland should have? Why did SEC not seized Heartland owners assets including their homes? The only reason could be because they are all white people.

Sahota's respectfully asking the Court to order the following in favor of Sahota's.

1. Respectfully remove the travel restrictions from the Court Order on Roger Sahota.
2. Court should respectfully order all the assets and \$14 million (As admitted by SEC's own Complaint under perjury of penalty) back to Sahota's that were owned by Sahota's before Heartland start doing business with Sahota's.
3. Court should respectfully order the return of \$14 Mil (As admitted by SEC's own Complaint under perjury of penalty) back to Sahota's that was not Heartland money as mentioned in SEC's Complaint.
4. Sahota's respectfully ask the Court to appoint National Commission for Minorities and ACLU to investigate if Sahota's Civil Right were violated by SEC and Receiver.
5. Sahota's have no funds to hire confident law firm to represent Sahota's fairly in the Courts, all funds were taken by SEC's Racially motivated fraud case. The SEC did not inform Sahota's about going to Court to get an original Court order to freeze all assets and bank account. The SEC informed Heartland owners and had discussion with them while taking a strongarm position against the Sahota's and taking everything in an instant decision. Sahota's asked Court to release funds for our legal team but were

denied. SEC tied Sahota's hands behind their backs and asked Sahota's to defend themselves without any funds. This was all a setup by SEC to harm Sahota's. This is not America we knew; this all was done like justice in Russia or China.

I am a Canadian Citizen and have potential business opportunities that I would like to explore in Canada. Because all our assets and funds are gone without justification, I have no access to any funds or any assets to pay living expenses.

For the reasons stated herein, I respectfully request the Court to Order to lift travel restrictions and return All our funds and assets that Sahota's owned before Heartland came in picture back to Sahota's

Respectfully,

A handwritten signature in blue ink, appearing to read 'Manjit Singh' with a stylized flourish at the end.

Dated: June 27, 2022

Manjit Singh (Roger) Sahota (Defendant)

12642 Raspberry Lane

San Angelo, Texas 76904