

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,

Plaintiff,

v.

VEROS PARTNERS, INC,  
MATTHEW D. HAAB,  
JEFFERY B. RISINGER,  
VEROS FARM LOAN HOLDING LLC,  
TOBIN J. SENEFFELD,  
FARMGROWCAP LLC,  
PINCAP LLC, and

Defendants,

PIN FINANCIAL LLC,

Relief Defendant.

Case No. 15-cv-659-JM S-M JD

**RULE 65(b) CERTIFICATION IN SUPPORT OF PLAINTIFF'S  
EX PARTE MOTION FOR A TEMPORARY RESTRAINING ORDER,  
ASSET FREEZE AND OTHER RELIEF**

Robert M. Moye, being duly sworn, on oath, deposes and states that if called upon to do so, he could competently and truthfully testify as follows:

1. I am a Senior Trial Counsel employed by the United States Securities and Exchange Commission in the Chicago Regional Office, located at 175 W. Jackson Blvd., Suite 900, Chicago, Illinois, 60604. I am a resident of, and licensed to practice law in, the State of Illinois.

2. This certification is based upon specific facts contained in the SEC's Complaint and the accompanying brief, declarations, and exhibits filed contemporaneously therewith.

These submissions demonstrate that the SEC has made a *prima facie* showing that defendants have participated in activities which violate the federal securities laws.

3. The SEC maintains that *ex parte* relief is appropriate in this case. Proceeding on an *ex parte* basis is warranted to increase the likelihood of freezing, and ultimately recovering, any investor money or other assets in Defendants' possession, custody or control. If Defendants are given advance notice that the SEC is seeking emergency relief, including an asset freeze, they may dissipate or hide any remaining assets.

4. Accordingly, for the reasons set forth above and in the SEC's supporting documents filed contemporaneously herewith, immediate and irreparable injury is likely to result to the SEC and to investors unless this matter is heard *ex parte*. For these reasons, the undersigned counsel has not attempted to give advance notice to defendants, which advance notice should be excused in light of circumstances present.

Dated: April 22, 2015.

Respectfully submitted,

*/s/Robert M. Moye*

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