

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

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UNITED STATES SECURITIES))
AND EXCHANGE COMMISSION,))
))
Plaintiff,))
))
v.)	Case No. 1:15-cv-659-JMS-MJD
))
VEROS PARTNERS, INC,))
MATTHEW D. HAAB,))
JEFFERY B. RISINGER,))
VEROS FARM LOAN HOLDING LLC,))
TOBIN J. SENEFELD,))
FARMGROWCAP LLC,))
PINCAP LLC, and))
))
Defendants,))
))
PIN FINANCIAL LLC,))
))
Relief Defendant.))
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PLAINTIFF’S PRELIMINARY WITNESS LIST

Plaintiff United States Securities and Exchange Commission (“the SEC”), pursuant to the parties’ Case Management Plan (Filing No. 67), submits the following preliminary list of potential witnesses¹:

1. Matthew D. Habb
2. Jeffery B. Risinger
3. Tobin J. Senefeld
4. Shawnda Trout

¹ Each of the individuals in this list is also identified in Plaintiff’s Initial Disclosures, with contact information, which was previously served on the Defendants.

5. Jessica McGowan
6. Shawn Gustafson
7. Joe E. Dotzlaf
8. Andre Guillaume
9. Patrizia Cavazzoni
10. Craig L. McShane
11. Records custodian for Main Source Bank
12. Records custodian for Millennium Trust
13. Other private offering investors
14. Witnesses identified by Defendants

The SEC reserves the right to amend or supplement this list based on information obtained during discovery. In addition, the SEC reserves the right to call additional witnesses, as permitted by the Court, for use on rebuttal and/or as impeachment.

Dated: August 28, 2015

Respectfully submitted,

/s/Doressia L. Hutton

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SECURITIES AND EXCHANGE COMMISSION

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*Attorneys for Plaintiff, the United States Securities
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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2015, I filed the foregoing Plaintiff's Preliminary Witness List via CM/ECF, which will notify all counsel of record.

/s/Doressia L. Hutton
Doressia L. Hutton