

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

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. SENEFFELD,)
FARMGROWCAP LLC, and)
PINCAP LLC,)

Defendants,)

PIN FINANCIAL LLC,)

Relief Defendant.)

DEFENDANT, JEFFERY B. RISINGER’S PRELIMINARY WITNESS LIST

Defendant, Jeffery B. Risinger (“Risinger”), by counsel, pursuant to the parties’ Case Management Plan (Filing No. 67), submits the following preliminary list of potential witnesses¹:

1. Shawn Gustafson
2. Matthew Haab
3. Tobin Senefeld
4. Shawnda Trout

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

5. Adam Decker
6. Jessica McGowan
7. All borrowers of FarmGrowCap LLC
8. All investors in the FarmGrowCap LLC, Veros Farm Loan Holding LLC, and in offerings conducted by PIN Financial LLC in its capacity as placement agent.
9. Robert Mitchell
10. Harold Birch
11. Brandt Downing
12. Witnesses identified by the Plaintiff

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

Dated: September 3, 2015

Respectfully submitted,

s/ Ronald E. Elberger

Ronald E. Elberger, (# 6675-49)

Bose McKinney & Evans LLP

111 Monument Circle, Suite 2700

Indianapolis, Indiana 46204

(317) 684-5195

(317) 233-0195 Fax

relberger@boselaw.com

Attorney for Defendant, Jeffery B. Risinger

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2015, I filed the foregoing “Defendant, Jeffery B. Risinger’s Preliminary Witness List via CM/ECF, which will notify all counsel of record.

s/ Ronald E. Elberger

2833161_1