

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. SENEFELD,)
FARMGROWCAP LLC, and)
PINCAP LLC,)

Defendants,)

PIN FINANCIAL LLC,)

Relief Defendant.)

**DEFENDANTS VEROS FARM LOAN HOLDING, LLC, VEROS PARTNERS, INC.
AND MATTHEW D. HAAB’S PRELIMINARY EXHIBIT LIST**

Defendants, Veros Farm Loan Holding, LLC and Matthew D. Haab (collectively, “Defendants”), by counsel, pursuant to Rule 8, F.R.C.P., pursuant to the parties’ Case Management Plan (Dkt. No. 67), submits the following preliminary list of its potential trial exhibits:

Exhibit No. 1: Matthew D. Haab, SEC investigative testimony transcript

Exhibit No. 2: Jeffery B. Risinger, SEC investigative testimony transcript

Exhibit No. 3: Tobin J. Senefeld, SEC investigative testimony transcript

Exhibit No. 4: 2013 Private Placement Memorandum Veros Farm Loan Holding
LLC

Exhibit No. 5: 2014 Private Placement Memorandum FarmGrowCap LLC

Exhibit No. 6: Confidential Private Placement of Loans Offered by Crossroads
Family Farms, LLC/Offering Document, March 28, 2012

Exhibit No. 7: Confidential Private Placement of Loans Offered by Kirbach Farms
GP/Offering Document, May 16, 2012

Exhibit No. 8: Communications with borrowers and investors

Defendants, Veros Farm Loan Holding, LLC, Veros Partners, Inc., and Matthew D. Haab reserve the right to amend or supplement this Preliminary Exhibit List based on additional information obtained during discovery.

In addition, Defendants, Veros Farm Loan Holding, LLC, Veros Partners, Inc., and Matthew D. Haab reserve the right to introduce any of the exhibits on the Plaintiff's exhibit list, as well as any additional documents, transcripts or other materials for use on rebuttal and/or as impeachment.

Dated: September 4, 2015

Respectfully submitted,

/s/ John F. McCauley
Richard J. Kiefer (5176-49)
John F. McCauley (20715-12)
James J. Bell (21548-49)

BINGHAM GREENEBAUM DOLL LLP
10 West Market Street, Suite 2700
Indianapolis, IN 46204
(317) 635-8900
rkiefer@bgdlegal.com
jmccauley@bgdlegal.com
jbell@bgdlegal.com

*Attorneys for Defendants,
Veros Partners, Inc., Matthew D. Haab and
Veros Farm Loan Folding LLC*

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of September, 2015, a copy of the foregoing "Defendants Veros Farm Loan Holding, LLC, Veros Partners, Inc. and Matthew D. Haab's Preliminary Witness List" was filed electronically using the CM/ECF system and is available to all counsel of record using same.

/s/ John F. McCauley