

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,  
PINCAP LLC, and

Defendants,

PIN FINANCIAL LLC,

Relief Defendant.

**RECEIVER’S NOTICE TO COURT OF NO OBJECTIONS TO  
SECOND MOTION FOR AUTHORITY TO SETTLE ILLINOIS LITIGATION**

William E. Wendling, Jr., the Receiver herein, by counsel, respectfully notifies the Court that he has received no objections to his second Motion for Authority to Settle Illinois Litigation [[Filing No. 195](#)] (“Second Motion”) filed on April 13, 2016. Further, the Receiver states:

1. Paragraph 17, on page 6 of the Second Motion [[Filing No. 195, at ECF p. 6](#)] stated that contemporaneously with the filing of the Second Motion, the Receiver was communicating with FGC’s investors about the proposed restructured Settlement Agreement and the anticipated benefits of that agreement to FGC’s investors and; further, that the Receiver

would notify the court of any objection he is aware of within fourteen (14) days of the filing of the Second Motion so that any such objection could be considered by the Court.

2. To date, the Receiver no investor has contacted the Receiver with any objections to the Second Motion. The Receiver was contacted by one individual regarding that investor's concerns regarding the Williams Settlement. Specifically, the investor believed that he did not have enough information to make a decision on the viability of the Settlement Agreement. He was particularly concerned that the SEC Defendants were not being pursued. The Receiver explained to the investor that the SEC was handling the pursuit of the Defendants in the federal court and it was not within the Receiver's authority to do so. The Receiver spoke with that individual at length and will be sending that investor additional information the investor requested. The investor told the Receiver that he did not object to the proposed restructured Settlement Agreement and the Receiver should proceed with it. The Receiver has received no other comments or concerns from any other FGC/Williams investors.

3. As indicated in the Receiver's Second Motion, none of the Defendants or SEC counsel have objections to the proposed restructured Settlement agreement.

4. The Receiver is prepared to discuss the merits of the proposed restructured Settlement Agreement with the Court at a hearing if the Court deems it advisable. In the alternative, if/when the Court approves the Receiver's Second Motion, the Receiver, by counsel requests the Court to enter the proposed Order [[Filing No. 195-4](#)] submitted with the Second Motion.

Respectfully submitted,

By /s/Anne Hensley Poindexter

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*Counsel for the Receiver*

### Certificate of Service

I hereby certify that on May 3, 2016, a copy of the foregoing *Receiver's Notice to Court of No Objections to Second Motion for Authority to Settle Illinois Litigation* was filed electronically. Notice of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Anne Hensley Poindexter

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*Counsel for the Receiver*