

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES AND)
EXCHANGE COMMISSION,)
)
Plaintiff,)

v.)

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 TOBIN J. SENEFFELD’S FINAL WITNESS LIST

Defendant Tobin J. Senefeld (“Senefeld”) hereby submits his Final Witness List.

1. Defendant Matthew Haab

Haab may be called to testify to the investments at issue in this lawsuit and the parties’ involvement with the investments.

2. Defendant Jeffery B. Risinger

Risinger may be called to testify to the investments at issue in this lawsuit and the parties’ involvement with the investments.

3. Shawn Gustafson

Gustafson may be called to testify to the due diligence performed on the farms and the parties' involvement with the investments at issue in this lawsuit.

4. Harold Birch

Birch may be called to testify as to the due diligence into, the operations of and the refinance of Crossroads Farms and Kirbach Farms.

5. Joe Boyer

Boyer may be called to testify to the due diligence into, the operations of and the loans to Boyer Farms.

6. Marty Kirbach

Kirbach may be called to testify to the due diligence into, the operations of, the loans to and the refinance of loans to Kirbach Farms.

7. Brad Stephenson

Stephenson may be called to testify to the due diligence into, the operations of, the loans to and the refinance of loans to Crossroads Farms.

8. Jim Williams

Williams may be called to testify to the due diligence into, the operations of, the loans to Williams Farms, his default on his obligations to repay and his improper sale of collateral securing his loans.

9. David Bassen

Bassen may be called to testify to the due diligence into, the operations of and the loans to Bassen Farms.

10. Rick Rosentretter

Rosentretter may be called to testify to the due diligence into, the operations of and the loans to Rosentretter Farms.

11. Shelly Hartman

Hartman may be called to testify to the due diligence into, the operations of and the loans to True Blue Farms.

12. Brandt Downing

Downing may be called to testify to the due diligence into, the operations of, the loans to and the refinance of Kirbach Farms.

13. Mark Schaefer

Schaefer may be called to testify to the due diligence into, the operations of, the loans to and any refinance of farms including Crossroads Farms, Williams Farm and True Blue Farms.

14. Robert Mitchell

Mitchell may be called to testify to the operations of Pin Financial, LLC.

15. Shawnda Trout

Trout may be called to testify to the handling of farm loan and investor accounts by Haab and Veros Partners and communications Haab and Veros had with investors.

16. Jessica McGowan

McGowan may be called to testify to the handling of farm loan and investor accounts by Haab and Veros Partners and communications Haab and Veros had with investors.

17. Adam Decker

Decker may be called to testify to the operations of Veros Partners, Inc.

18. Rick Dennen

Dennen may be called to testify to communications with Senefeld that the SEC has alleged related to the investments at issue in this lawsuit.

19. Marty McFarland

McFarland may be called to testify to communications with Senefeld that the SEC has alleged related to the investments at issue in this lawsuit

20. William Wendling

Wendling may be called to testify to his work as Receiver in this matter.

21. All witnesses, not otherwise objectionable, identified by Plaintiff or any other party in any party's initial disclosures or witness lists.

22. Any witness, not otherwise objectionable, relevant to Plaintiff's claims for damages, disgorgement and/or penalties.

23. Appropriate record keepers of parties or non-parties subpoenaed in this case.

24. All witnesses necessary to authenticate documents.

25. All witnesses necessary for rebuttal or impeachment.

Respectfully submitted,

/s/ Jeanine Kerridge

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Attorney for Defendant Tobin J. Senefeld

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 3rd day of August, 2016, a copy of the foregoing was filed electronically using the CM/ECF system and is available to all counsel of record using same.

/s/ Jeanine Kerridge _____
Jeanine Kerridge