

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

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

Case No. 1:15-cv-659-JMS-MJD

**VEROS PARTNERS, INC., MATTHEW D. HAAB
AND VEROS FARM LOAN HOLDING LLC’S RESPONSE
TO THE COMMISSION’S MOTION FOR PRELIMINARY INJUNCTION**

Defendants, Veros Partners, Inc., Matthew D. Haab and Veros Farm Loan Holding LLC, by counsel, hereby respond to the Commission’s Motion for Preliminary Injunction, and state the following:

1. On April 23, 2015, this Court granted the Securities and Exchange Commission’s (“SEC”) request for a Temporary Restraining Order (“TRO”) against the named Defendants in this action. The Court has ordered these Defendants to file their response to the SEC’s Motion for a Preliminary Injunction by 7:00 p.m. on April 30, 2015.

2. Defendants Veros Partners, Inc., Matthew D. Haab and Veros Farm Loan Holding LLC have reached an agreement in principle with the Commission. The aforementioned parties intend to tender an agreed Order to the Court at the status conference scheduled for Friday, May 1, 2015 at 10:45 a.m.

3. The undersigned counsel has been in communication with Ron Elberger, counsel for Defendant Jeffrey Risinger. Mr. Elberger has authorized the undersigned to state to the Court that Mr. Risinger has also reached an agreement in principle with the Commission.

4. Because of this, no further written response is needed from Veros Partners, Inc., Mr. Haab, Veros Farm Loan Holding LLC and Mr. Risinger.

Respectfully submitted,

/s/ John F. McCauley
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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2015 a copy of the foregoing “Veros Partners, Inc., Matthew D. Haab and Veros Farm Loan Holding LLC, Response to the Commission’s Motion for Preliminary Injunction” was filed electronically. Notice of this filing will be sent to the following counsel by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

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