

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

Any party shall file a response to this  
Motion no later than **May 26, 2017**.  
JMS, CJ, 5-19-17  
Distribution via ECF.

**MOTION FOR AUTHORITY TO INITIATE LITIGATION AGAINST PERSONAL  
GUARANTORS OF RJW WILLIAMS SETTLEMENT**

William E. Wendling, Jr., the Receiver herein, by counsel, respectfully requests the Court’s authority to file a lawsuit against the personal guarantors of the RJW Williams Settlement, and in support thereof, state as follows:

1. On May 1, 2015, this Court entered its Agreed Order Appointing William E. Wendling, Jr., as the Receiver over FarmGrowCap, LLC (“FGC”) and other defendants herein [\[Filing No. 34\]](#).
2. On February 3, 2015 (before the Receiver was appointed), FGC, by and through its attorneys, filed a Complaint for Breach of Contract and Other Specified Relief in the