

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.)

**UNOPPOSED MOTION FOR RECEIVER TO SUPERVISE AND
ADMINISTER PIN FINANCIAL, LLC ACCOUNT**

Defendant Tobin J. Senefeld (“Senefeld”), with agreement from Plaintiff, Securities and Exchange Commission (the “SEC”), and the Court-appointed Receiver, William E. Wendling, Jr., hereby requests that the Court enter an order allowing the Receiver to take supervision of and administer the bank account of Pin Financial, LLC, and in support hereof states as follows:

1. On May 7, 2015, this Court entered a Preliminary Injunction Order that, in part, froze the Citibank account of Pin Financial, account number XXX4850. [Doc. 48].
2. Pin Financial is a Relief Defendant and its account has not been brought under the Receiver’s control or supervision.

3. As part of the Preliminary Injunction Order, the Court also provided that Senefeld could continue to act as President and CEO of Pin Financial under the supervision of the Receiver. [Doc. 48].

4. Senefeld has been working diligently under the Receiver's supervision and as approved by the SEC to attempt to bring in funds to Pin Financial which could be set aside in escrow for repayment to investors.

5. Pin Financial and Senefeld also continue to incur expenses in operating under the Receiver's supervision.

6. The parties believe that operations of Pin Financial will be facilitated if the Receiver takes supervision of and administers Pin Financial's account so that the Receiver can approve appropriate business expenses incurred in conducting business under his supervision and oversee any funds that come into the Pin Financial account during the pendency of this litigation.

7. The Receiver agrees with and consents to this request.

8. The SEC also agrees with and consents to this request.

9. This request will not prejudice investors as the account will be supervised by the Receiver with the approval of the SEC.

WHEREFORE, Defendant Tobin J. Senefeld, with agreement of Plaintiff, the Securities and Exchange Commission and the Court-appointed Receiver, respectfully requests that the Court enter an Order allowing Pin Financial, LLC's account at Citibank to be supervised and administered by the Receiver, and all other just and proper relief.

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 21st day of July, 2015, 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