

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 PRELIMINARY EXHIBIT LIST

Defendant Tobin J. Senefeld ("Senefeld") hereby submits his Preliminary Exhibit List.

1. Transcripts of any investigative administrative testimony or depositions taken in this matter.
2. All private placement memorandums and/or other documents relating to disclosures and communications to investors.
3. Any documents that reference or pertain to Plaintiff's allegations and/or any defense by Senefeld or any other Defendant.
4. Documents relating to the damages alleged in this matter.

5. Any and all documents introduced in a deposition or investigative administrative testimony taken by the parties in this case.
6. Any witness statement or affidavit taken or obtained by any party or non-party to this matter.
7. Documents produced by any party or non-party in this matter.
8. Any and all documents identified by any party in a party's exhibit lists.
9. All pleadings filed in this matter.
10. All answers to interrogatories, requests for production of documents and requests for admissions in this matter, including all amendments and supplements.
11. All relevant documents necessary for rebuttal or impeachment purposes.
12. Any additional documents Senefeld deems relevant as investigation and discovery in this matter continues.

Respectfully submitted,

Dated: September 4, 2015

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Attorney for Defendant Tobin J. Senefeld

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of September, 2015, a copy of the foregoing was filed electronically using the CM/ECF system and is available to all counsel of record using same.

Jeanine Kerridge

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