

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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UNITED STATES SECURITIES	)	)
AND EXCHANGE COMMISSION,	)	)
	)	)
<b>Plaintiff,</b>	)	)
	)	)
<b>v.</b>	)	<b>Case No. 1:15-cv-659-JMS-MJD</b>
	)	)
VEROS PARTNERS, INC,	)	)
MATTHEW D. HAAB,	)	)
JEFFERY B. RISINGER,	)	)
VEROS FARM LOAN HOLDING LLC,	)	)
TOBIN J. SENEFELD,	)	)
FARMGROWCAP LLC,	)	)
PINCAP LLC, and	)	)
	)	)
<b>Defendants,</b>	)	)
	)	)
PIN FINANCIAL LLC,	)	)
	)	)
<b>Relief Defendant.</b>	)	)
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**PLAINTIFF’S FINAL WITNESS LIST**

Plaintiff United States Securities and Exchange Commission (“the SEC”), pursuant to Section III. I. of the parties’ Case Management Plan (Filing No. 67), submits the following list of witnesses it may call at trial:

1. Matthew D. Habb may be called to testify about his relationship with Veros Partners, Inc. (“Veros”), an investment adviser, his role in managing Veros, Veros Farm Loan Holdings, LLC (“VFLH”), FarmGrowCap LLC (“FarmGrowCap”), and PinCap LLC (“PinCap”). Mr. Haab also may testify about his disclosures to, and communications with, the investors and potential investors in certain private investments, including the 2012 Kirbach and Crossroad farm loans, VFLH, a 2014 PinCap Bridge Loan, and FarmGrowCap, as well as with

the SEC's compliance examiners in 2014. Mr. Haab also may testify about his relationship and communications with Jeffery Risinger, Shawn Gustafson, and Tobin Senefeld, and the responsibilities each had with respect to the 2012 farm loan investments, VFLH, the 2014 PinCap Bridge Loan, FarmGrowCap, and PinCap. Mr. Haab also may testify about the performance of the various farm loan offerings, the use of investor funds to pay investors in previous offerings, and the "rollover" of investor contributions to a subsequent offering. Finally, Mr. Haab may testify about any the compensation or payments which he or the other defendants received in connection with the farm loan offerings. The SEC anticipates that Mr. Haab's testimony would be consistent with his investigative testimony, as well as with his Declaration of April 27, 2016.

2. Jeffery B. Risinger may be called to testify about his relationship with Matthew Haab, Shawn Gustafson and Tobin Senefeld, and the role that each had with respect to Veros, VFLH, FarmGrowCap, PinCap and Pin Financial. Mr. Risinger also may testify about the structure and operations of certain private farm loan investments, including the 2012 Kirbach and Crossroads farm loans, VFLH, the 2014 PinCap Bridge Loan and FarmGrowCap. Mr. Risinger also may testify about his role in drafting agreements and disclosure documents for the foregoing private investments, including the disclosure regarding Senefeld's 1999 SEC settlement, and the Defendants' communications with investors or potential investors. Mr. Risinger also may testify about the performance of the various farm loan offerings, the use of investor funds to pay investors in previous offerings, and the "rollover" of investor contributions to a subsequent offering. Finally, Mr. Risinger may also testify about the compensation or payments which he or the other defendants received in connection with the farm loan offerings. The SEC anticipates

that Mr. Risinger's testimony would be consistent with his investigative testimony, as well as with his Declaration of April 27, 2016.

3. Tobin J. Senefeld may be called testify, as an adverse witness, about his relationship with Matthew Haab, Jeffery Risinger, Shawn Gustafson, Veros, VFLH, FarmGrowCap, PinCap, and Pin Financial LLC "(Pin Financial)"). Mr. Senefeld also may be asked to testify about his activities and responsibilities in connection with certain private farm loan investments, including the 2012 Kirbach and Crossroads farm loans, VFLH, the 2014 PinCap Bridge Loan, and FarmGrowCap. Mr. Senefeld may also be asked to testify about certain communications with investors or potential investors in those private investments, and his communications with certain farmers who received loans from Veros clients and other investors. Mr. Senefeld may also testify about his relationship and communications with Mr. Haab and Mr. Risinger, and about the compensation or payments which he received in connection with his work for VFLH, FarmGrowCap, PinCap and Pin Financial.

4. Shawnda Trout may be called to testify about her role and responsibilities with Veros, and her knowledge of the financial records of FarmGrowCap and PinCap. Ms. Trout also may testify about the cash flow, performance, and other accounting aspects of certain private farm loan investments offered to Veros clients and other investors. In addition, Ms. Trout may testify the general operations and structure of Veros, FarmGrowCap, and PinCap, as well as about her communications with Mr. Haab, Mr. Risinger, and Mr. Senefeld.

5. Jessica McGowan may be called to testify about Mr. Haab's activities and her knowledge of certain private investments offered to Veros clients. Ms. McGowan may testify about certain communications with Veros clients regarding farm loan and other private investments offered to Veros clients and other investors. Finally, Ms. McGowan may also testify

about the distribution of proceeds to Veros clients and other investors, as well as communications with Mr. Haab, Mr. Risinger, and Mr. Senefeld.

6. Shawn Gustafson may be called to testify about his relationship with Tobin Senefeld, and his role and responsibilities with FarmGrowCap, PinCap and Pin Financial. Mr. Gustafson may also testify about knowledge and understanding of certain private farm loan offerings including 2012 Kirbach and Crossroads, VFLH, the 2014 PinCap Bridge Loan, and FarmGrowCap. Mr. Gustafson also may testify about the performance of the various farm loan offerings, the use of investor funds to pay investors in previous offerings, and the “rollover” of investor contributions to a subsequent offering. Finally, Mr. Gustafson may be asked to testify about his interactions and communications with Matthew Haab, Jeffery Risinger, and Senefeld. The SEC anticipates that Mr. Gustafson’s testimony will be consistent with his Declaration of February 5, 2016.

7. Joe E. Dotzlaf may be called to testify about his relationship with Veros, his communications with Matthew Haab and other Veros representatives, and his investments in certain private farm loan offerings, including the 2012 Kirbach and Crossroads farm loans, VFLH, and FarmGrowCap. He may also testify about his understanding of the private farm loan investments, the intended uses of the funds he invested, and the representations made to him about the performance of those investments. The SEC anticipates that Mr. Dotzlaf’s testimony would be consistent with his Declaration of April 16, 2015.

8. Patrizia Cavazzoni may be called to testify about her relationship with Veros, her communications with Matthew Haab and other Veros representatives, and her investments in certain private farm loan offerings, including VFLH and FarmGrowCap. She may also testify about her understanding of the private farm loan investments, the intended uses of the funds she

invested, and the representations made to her about the performance of those investments. The SEC anticipates that Ms. Cavazzoni's testimony would be consistent with her Declaration of April 15, 2015.

9. Matthew T. McCrady may be called to testify about his relationship with Veros, his communications with Matthew Haab and other Veros representatives, and his investments in certain private farm loan offerings. He may also testify about his understanding of the private farm loan investments, the intended uses of the funds he invested, and the representations made to him about the performance of those investments.

10. Sandra Harlow may be called to testify about her relationship with Veros, her communications with Matthew Haab and other Veros representatives, and her investments in certain private farm loan offerings. She may also testify about her understanding of the private farm loan investments, the intended uses of the funds she invested, and the representations made to her about the performance of those investments.

11. Craig L. McShane may be called to testify about any of the subjects described in his April 2015 declarations, including but not limited to his review and analysis of the financial and bank account records for VFLH, FarmGrowCap and PinCap. Mr. McShane would testify as a summary witness and describe the contents of voluminous bank records, financial documents, or other evidence in this case. In addition, Mr. McShane may testify regarding the compensation or payments the defendants received in connection with VFLH, FarmGrowCap or PinCap. The SEC anticipates that Mr. McShane's testimony would be consistent with his Amended Declaration of April 30, 2015.

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The SEC reserves the right to amend or supplement this list based on information obtained before trial. In addition, the SEC reserves the right to call additional witnesses, as permitted by the Court, for use on rebuttal and/or as impeachment.

Dated: August 3, 2016.

Respectfully submitted,

/s/Robert M. Moye

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*Attorneys for Plaintiff, the United States Securities  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 2016, I filed the foregoing Plaintiff's Final Witness List via CM/ECF, which will notify all counsel of record.

**/s/Robert M. Moye**

Robert M. Moye