

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

RECEIVER’S NOTICE OF INVESTOR OBJECTION TO RECEIVER’S MOTION TO ENLARGE TIME TO FILE QUARTERLY STATUS REPORT

William E. Wendling, Jr., the Receiver herein, by counsel, respectfully notifies the Court that a single investor emailed the Receiver and his counsel, Anne Hensley Poindexter, and an attorney representing the investor and indicated that multiple investors object to Receiver’s Motion to Enlarge Time to File Quarterly Status Report [[Filing No. 348](#)] wherein the Receiver asked for a brief extension of time until only February 10, 2017, in which to file Receiver’s Quarterly Status Report. Counsel for the Receiver responded to the investor’s attorney indicating because she did not know the nature of the objection or whom the investor purported

to speak on behalf of, the attorney should notify the Court of the objection. Shortly after filing the Motion, the attorney responded via email and declined to notify the Court of the objection indicating that he does not represent the investor on this issue. The emails are attached hereto as [Exhibit A](#).

Respectfully submitted,

By /s/ Anne Hensley Poindexter

Anne Hensley Poindexter, #14051-29
Altman, Poindexter & Wyatt LLC
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Carmel, IN 46032
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Counsel for the Receiver

Certificate of Service

I hereby certify that on February 2, 2017, a copy of the foregoing *Receiver's Notice of Investor Objection to Receiver's Motion for Enlargement of Time to File Quarterly Status Report* was filed electronically. Notice of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Anne Hensley Poindexter

Anne Hensley Poindexter, #14051-29
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EXHIBIT A

-----Original Message-----

From: Hamish Cohen [mailto:Hamish.Cohen@mbcblaw.com]
Sent: Thursday, February 2, 2017 2:52 PM
To: Anne Poindexter <apoindexter@apwlawyer.com>
Subject: RE: Objection to Motion to Extend Quarterly Report and Fee Application

Anne:

I don't know who the investors are as well, and I don't represent them in relation to that issue. If I hear from my investor group, I will inquire. Thank you and best regards,

Hamish

-----Original Message-----

From: Anne Poindexter [mailto:apoindexter@apwlawyer.com]
Sent: Thursday, February 02, 2017 1:14 PM
To: Hamish Cohen <Hamish.Cohen@mbcblaw.com>
Subject: FW: Objection to Motion to Extend Quarterly Report and Fee Application

Hamish, I attempted to call but did not reach you. I do not know which investor(s) Andre is referring to other than himself nor the basis of his objection. Because he is copying you on this and you are representing him I will not respond to him directly. I think it is best if you let the court know the position and who he is speaking for. I did not want to put aside or lose any momentum on our BCG, Cherry Farms, Stadiumred and now Broker Dealer assignments/transfers we are currently working on. If we need to finalize the report, which is in draft form, it can take away from the other projects for now and I thought they were the higher priority. I do believe the short extension will promote the cost effectiveness and efficiency of the receivership particularly as we work to transition/distribute/assign so many of these private placements at this time.

On Cherry Farms, please know we are working on assignment document for Cherry farms which I will be sending to you for review. The assignment is we believe the appropriate vehicle to complete the transfers and what I am also working on with NY counsel on the Stadiumred deal. Several emails ago you indicated you were going to call about Cherry farms and I know you have been crazy busy but I am happy to talk with you and am in the office today and most of tomorrow.

I hope you are well.

Anne

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Paralegal | Cari Bonty | cbonty@apwlawyer.com

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Please consider the environment before printing this email.

-----Original Message-----

From: Andre Guillaume [mailto:aguillaume@acetechllc.com]

Sent: Thursday, February 2, 2017 9:31 AM

To: Bill Wendling <wwendling@cgglawfirm.com>

Cc: Hamish Cohen <hamish.cohen@mbcblaw.com>; Kevin Tretter <Tretter.Kevin@gmail.com>; Anne Poindexter <apindexter@apwlawyer.com>; Anita Haworth <ahaworth@cgglawfirm.com>

Subject: Objection to Motion to Extend Quarterly Report and Fee Application

Bill,
Please inform the Court immediately that multiple Investors object to your motion to extend the quarterly report and fee application.

Andre

Sent from my iPhone

CONFIDENTIAL AND POTENTIALLY PRIVILEGED: This email and any attachment(s) are for the confidential use of the intended recipient(s). If you are not an intended recipient, DO NOT READ, DISTRIBUTE or RELY ON this message and remove this message from your system (including removal from any hosted or cloud-based system). To the extent you are not the intended recipient, prior to destruction, please notify us immediately of your receipt of this message by replying to this message (Please also remove the reply from your system). Any disclosure of this message to unintended recipients was inadvertent and not intended to waive any attorney-client or work product privileges.