

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

v.

Case No. 1:15-cv-659-JMS-MJD

TOBIN J. SENEFELD, et al.

Defendants,

PIN FINANCIAL LLC,

Relief Defendant.

DECLARATION OF CRAIG MCSHANE REGARDING PIN FINANCIAL


1. I am a Staff Accountant with the Enforcement Division of the United States Securities and Exchange Commission (“SEC”) in its Chicago Regional Office. I have been employed by the SEC since October 2014. My duties include participating in fact-finding inquiries and investigations to determine whether the federal securities laws have been, are presently being, or are about to be violated, and assisting in the SEC’s litigation of enforcement actions.
2. I received a BA degree from the University of Chicago and an MBA degree from Saint Xavier University. Prior to joining the SEC, I worked for nine years in the financial industry.

3. On approximately February 24, 2015, I was asked to review bank account records and other materials relating to certain private investments that were offered to investors by Veros Partners Inc. (“Veros”) and other defendants. I was also asked to analyze and trace the flow of investor funds through accounts controlled by the defendants.
4. In order to analyze and trace the flow of funds, I reviewed:
 - a. Bank account statements, deposit slips, wire transfer confirmations, and electronic fund transfer details for certain bank accounts controlled by the defendants; and
 - b. Other documentary evidence obtained by the SEC during the course of its investigation in this matter.
5. I also attended and participated in the investigative testimony of Matthew Haab, Jeffery Risinger, and Tobin Senefeld, and reviewed transcripts of their testimony.
6. As part of my duties, I was asked to identify any payments from accounts in the name of PinCap LLC (“PinCap”) to Pin Financial LLC (“Pin Financial”).
7. Pin Financial was a New York limited liability company and SEC-registered broker-dealer based in New York, New York. Pin Financial acted as placement agent for private offerings made to Veros advisory clients. Risinger and Senefeld acquired Pin Financial in or around 2013, and PinCap was the owner as of the time of the SEC’s complaint. Pin Financial was registered with the Commission as a broker-dealer in 2005 until October 26, 2016.
8. Between February 28, 2013 and February 27, 2015, \$9,000 was transferred from two PinCap accounts to Pin Financial. The table below shows the details of each transfer.

Date of Transfer	Sending Account	Amount
2/28/2013	Xxx7557	\$2,500
4/18/2013	Xxx7557	\$1,500
2/27/2015	Xxx7816	\$5,000
Total		\$9,000

9. I have calculated a pre-judgement interest total of \$273.05 applicable to the amount of \$9,000. I calculated this pre-judgement interest by applying the interest rate, adjusted quarterly, used by the Internal Revenue Service for computation of interest on underpayment of taxes. Interest was compounded quarterly, beginning on March 24, 2014 the midpoint of the second and last payments received by Pin Financial.

I, Craig L. McShane, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on the 1st day of May, 2018.



 Craig L. McShane

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2018, I served the foregoing **DECLARATION OF CRAIG MCSHANE REGARDING PIN FINANCIAL** on all counsel of record through the Court's ECF filing system.

I hereby certify that I caused a copy of the foregoing **DECLARATION OF CRAIG MCSHANE REGARDING PIN FINANCIAL** to be served upon the following entity by email delivery and UPS delivery on May 2, 2018 at the addresses shown:

Pin Financial LLC
600 E Carmel Drive
Suite 114
Indianapolis, IN 46032
Bob@pfcmitche11.com

Pin Financial LLC
c/o Robert Mitchell
24 Exeter Street
Williston Park, New York 11596
Bob@pfcmitche11.com

/S/DORESSIA L. HUTTON