UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	
Plaintiff,	
v.	**Case No. 15-cv-659-JMS-MJD**
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.	

RECEIVER'S MOTION TO HIRE COUNSEL FOR THE RECEIVER AND TO PURSUE SPECIAL CLAIMS ON BEHALF OF THE DEFENDANTS

William E. Wendling, Jr., the Receiver appointed in this case, respectfully requests the Court for authority to employ Anne Hensley Poindexter and Rodney T. Sarkovics of the law firm of Campbell Kyle Proffitt LLP as counsel for the Receiver in this Matter and for any potential claw back or other litigation which the Court may later determine necessary by the Receiver. In support of this motion, the Receiver States:

1. Pursuant to the Agreed Order Appointing Receiver entered May 1, 2015 [Filing No. 34], William E. Wendling, Jr. was appointed to serve without bond as the Receiver for the

estates of the Receivership Defendants with the powers and duties and additional responsibilities as set forth therein.

2. Among the powers and duties of the Receiver are:

> To take custody, control and possession of all Receivership Property and records relevant thereto from the Receivership Defendants; to sue for and collect, recover, receive and take into possession from third parties all Receivership Property and records relevant thereto…
>
> To engage and employ persons in his direction to assist him in carrying out his duties and responsibilities hereunder, including, but not limited to, accountants, attorneys, securities traders, registered representatives, financial or business advisers, liquidating agents, real estate agents, forensic experts, brokers, traders or auctioneers…
>
> To bring such legal actions based on law or equity in any states, federal, or foreign court as the Receiver deems necessary or appropriate in discharging his duties as Receiver;
>
> To pursue, resist and defend all suits actions, claims and demands which may now be pending or which may be brought by or asserted against the Receivership Estates; and,
>
> To take such other action as may be approved by this Court.
>
> *Agreed Order Appointing Receiver [Filing No. 34, at ECF pp. 4-5]*

3. Accordingly, the Receiver requests the Court's authority to employ Anne Hensley Poindexter and Rodney T. Sarkovics (partners) of the law firm of Campbell Kyle Proffitt LLP as counsel for the Receiver in this matter and in any potential claw back or other litigation which the Court may later determine necessary by the Receiver.

4. Anne Hensley Poindexter and Rodney T. Sarkovics are experienced litigators able to appropriately assist the Receiver herein. An Affidavit of Campbell Kyle Proffitt LLP is attached hereto as Exhibit A.

5. The Receiver believes that employing Anne Hensley Poindexter and Rodney T. Sarkovics is in the best interest of the receivership estate because they have the experience and

resources to efficiently and effectively represent the Receiver in this and in other potential matters involving the Receivership Estate.

6. Mrs. Poindexter and Mr. Sarkovics will provide legal representation in this case at the hourly rates set forth in Exhibit B. The Receiver seeks Court approval to pay those amounts on a tentative basis pending final approval as set forth in the Agreed Order Appointing Receiver [Filing No. 34, at ECF pp. 21-22].

7. Counsel for the United States Securities and Exchange Commission is aware of this motion and has informed the Receiver that there is no objection to the same.

WHEREFORE, the Receiver requests that this Court enter an order authorizing him to employ Anne Hensley Poindexter and Rodney T. Sarkovics of the law firm of Campbell Kyle Proffitt LLP as counsel for the Receiver in this matter and in any potential claw back or other litigation which the Court may later determine necessary by the Receiver and to compensate them consistent with the hourly rates set forth in Exhibit B.

Respectfully submitted,

By *s/William E. Wendling, Jr.*

William E. Wendling, Jr., #2004-49
RECEIVER
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Receiver

Certificate of Service

I hereby certify that on June 15, 2015, a copy of the foregoing Receiver's Motion for Order Authorizing Employment of Anne Hensley Poindexter and Rodney T. Sarkovics as Counsel for the Receiver was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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s/William E. Wendling, Jr. .

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	)	
Plaintiff,	)	
v.	)	**Case No. 15-cv-659-JMS-MJD**
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.	)	

AFFIDAVIT OF ANNE HENSLEY POINDEXTER ON BEHALF OF ANNE HENSLEY POINDEXTER, RODNEY T. SARKOVICS, AND CAMPBELL KYLE PROFFITT LLP TO BE EMPLOYED AS COUNSEL FOR RECEIVER

Anne Hensley Poindexter, being duly sworn upon her oath, deposes and says:

1. I am an adult, have personal knowledge of each of the facts set forth herein and am competent to testify at any trial or hearing concerning this Affidavit.

2. I am a partner with the law firm of Campbell Kyle Proffitt LLP.

3. I have reviewed the complaint filed in this cause by the United States Securities and Exchange Commission and in light of this proposed and in light of this proposed engagement as special counsel to the Trustee, make the following disclosures and statements:

a. Our firm has never represented any of the entities or individual Defendants named in this Receivership action in any capacity.

b. Neither I, nor any partner or associate of my firm, insofar as I have been able to ascertain, represents any interest adverse to that of the Receivership Estates.

FURTHER YOUR AFFIANT SAITH NAUGHT

Respectfully submitted,

CAMPBELL KYLE PROFFITT LLP

By _____

STATE OF INDIANA)
) SS:
COUNTY OF HAMILTON)

ACKNOWLEDGEMENT

Before me, a Notary Public in and for said County and State, personally appeared Anne Hensley Poindexter who acknowledged the execution of the foregoing document and who, having been duly sworn, stated that any representations therein contained are true.

Witness my hand and Notarial Seal this 15th day of June, 2015

NOTARY PUBLIC SEAL INDIANA
ANITA G. HAWORTH
MY COMMISSION EXPIRES: 02-14-2016
MY COMMISSION NUMBER IS: 581402
MY COUNTY OF RESIDENCE IS: TIPTON

Signature: _____

EXHIBIT B

NAME	HOURLY RATE
Anne Hensley Poindexter, Partner	$275
Rodney T Sarkovics, Partner	$250
Anita G. Haworth, Paralegal	$125
Cari W. Bonty, Paralegal	$125

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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.	)	

ORDER AUTHORIZING RECEIVER TO EMPLOY COUNSEL

WHEREAS this matter has come before this Court upon the motion fo William E. Wendling, Jr. ("Receiver") to hire Anne Hensley Poindexter and Rodney T. Sarkovics of Campbell Kyle Proffitt LLP as counsel for the Receiver and matter and for any potential claw back or other litigation which the Court may later determine necessary by the Receiver;

WHEREAS the Court finds that employment of counsel for the Receiver is reasonable to assist the Receiver in this matter and for any potential claw back or other litigation which the Court may later deem necessary by the Receiver; and

WHEREAS Anne Hensley Poindexter and Rodney T. Sarkovics of Campbell Kyle Proffitt LLP have the knowledge and experience to appropriately assist the Receiver herein.

IT IS THEREFORE ORDERED THAT:

The Receiver is authorized to retain Anne Hensley Poindexter and Rodney T. Sarkovics of Campbell Kyle Proffitt LLP as counsel for the Receiver in this matter and in any potential claw back or other litigation which the Court may later deem necessary by the Receiver. The Court specifically approves the fees for said counsel at the rates set forth in exhibit B to said motion and finds that the same are fair and reasonable and in the best interests of the Receivership entities.

Dated:_____

_____

Honorable Jane Magnus-Stinson, Judge
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA

Distribution:

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