

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES)	
AND EXCHANGE COMMISSION,)	
)	
Plaintiff,)	Cause No. 1-15-cv-00659-JMS-MJD
)	
v.)	
)	
VEROS PARTNERS, INC.)	
MATTHEW D. HAAB,)	
JEFFERY B. RISINGER,)	
VEROS FARM LOAN HOLDING LLC,)	
TOBIN J. SENEFELD,)	
FARM GROWCAP LLC, and)	
PINCAP LLC,)	

**VEROS PARTNERS, INC.’S NOTICE REGARDING
BUSINESS ACTIVITIES OF M.W. BANKS, LLC**

Defendant Veros Partners, Inc. provides the following notice to the Court:

1. As the Court is aware from previous filings and from testimony at the hearing held on September 3, 2015, Veros Partners’ consulting clients have threatened to terminate their relationships with Veros Partners as a result of this ongoing litigation. As Adam Decker testified during that hearing, some of these clients already have terminated those relationships.

2. During a phone conversation on or about Monday, September 21, 2015, Receiver William Wendling inquired of Mr. Decker whether any of Veros Partners’ clients who had terminated their relationships with Veros Partners had commenced relationships with M.W. Banks Consulting, LLC, and whether M.W. Banks had

billed and been paid by any such former clients. Mr. Decker truthfully replied that he was unaware of any such circumstances.

3. Later that evening, Mr. Decker contacted Amber Banks, a principal of M.W. Banks, to confirm his understanding on this topic. Mr. Decker asked her if M.W. Banks had sent bills to, or had received payments from, any former Veros Partners clients. Instead of answering the question, Ms. Banks immediately referred Mr. Decker to M.W. Banks' lawyer.

4. Undersigned counsel then scheduled a conference call with M.W. Banks' lawyer to determine whether M.W. Banks had, in fact, received payments from any former Veros Partners consulting clients. Counsel for M.W. Banks answered this question in the affirmative.

5. At no time has Veros Partners, or anyone acting on its behalf, transferred any assets to M.W. Banks; nor has Veros Partners, or anyone acting on its behalf, authorized M.W. Banks to receive payments from any current or former Veros Partners clients.

6. None of the money received by M.W. Banks was forwarded to or in any manner shared with Veros Partners or anyone acting on its behalf. M.W. Banks has not paid Veros Partners or anyone acting on its behalf any money in connection with the proposed asset sale currently under consideration by the Court.

7. Veros Partners quickly determined that Mr. Decker's statement had to be corrected, so counsel for Veros Partners telephoned Mr. Wendling at 11:00 a.m. on Friday, September 25, 2015. During a 30-minute conversation, counsel

explained the facts set forth above. Mr. Wendling stated that he would update the SEC on the situation.

8. At approximately 1:15 p.m. on Friday, September 25, 2015, undersigned counsel again spoke with Mr. Wendling. Mr. Wendling advised that counsel for the SEC insisted that Veros Partners promptly notify the Court that M.W. Banks had been paid for work performed for former Veros Partners clients. Mr. Wendling further conveyed the SEC's intention to notify the Court of this fact itself if Veros Partners did not promptly do so. Shortly thereafter, counsel for the SEC sent an email message to undersigned counsel for Veros Partners directly conveying the same request.

9. Veros Partners believes that M.W. Banks' performance work for former Veros Partners' clients, and its apparent acceptance of payment for this work, have no impact at all on Veros Partners' motion pending before the Court. Indeed, if this development does have any effect, it should be to demonstrate that Veros Partners' clients are free to terminate their relationships with Veros Partners, and that they are actually doing so.

Respectfully submitted,

/s/ F. Anthony Paganelli

F. Anthony Paganelli (IN 18425-53)
Counsel for Veros Partners, Inc.

CERTIFICATE OF SERVICE

I certify that, on September 25, 2015, the foregoing document was filed using the Court's CM/ECF system, which will serve notice upon the following counsel of record:

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