

BrokerCheck Report

TOBIN JOSEPH SENEFELD

CRD# 2120820

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About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:

- o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
- o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. [For more information about FINRA, visit www.finra.org.](http://www.finra.org)

TOBIN J. SENEFELD

CRD# 2120820

This broker is not currently registered.

Report Summary for this Broker



This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is not currently registered.

This broker has passed:

- 1 Principal/Supervisory Exam
- 2 General Industry/Product Exams
- 2 State Securities Law Exams

Registration History

This broker was previously registered with the following securities firm(s):

PIN FINANCIAL, LLC

CRD# 132876
Carmel, IN
12/2012 - 06/2016

CHAMPION SECURITIES COMPANY L.L.C.

CRD# 25892
CARMEL, IN
02/2012 - 06/2012

INDIANA SECURITIES, LLC

CRD# 45115
INDIANAPOLIS, IN
07/2009 - 04/2011

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

Are there events disclosed about this broker? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	18
Civil Event	1
Customer Dispute	1
Termination	1
Judgment/Lien	7

Broker Qualifications



Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This broker is not currently registered.



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

This individual has passed 1 principal/supervisory exam, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
General Securities Principal Examination	Series 24	04/11/2013

General Industry/Product Exams

Exam	Category	Date
Securities Industry Essentials Examination	SIE	06/22/2016
General Securities Representative Examination	Series 7	07/21/2009

State Securities Law Exams

Exam	Category	Date
Uniform Securities Agent State Law Examination	Series 63	07/27/2009
Uniform Investment Adviser Law Examination	Series 65	12/05/2006

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
12/2012 - 06/2016	PIN FINANCIAL, LLC	132876	Carmel, IN
02/2012 - 06/2012	CHAMPION SECURITIES COMPANY L.L.C.	25892	CARMEL, IN
07/2009 - 04/2011	INDIANA SECURITIES, LLC	45115	INDIANAPOLIS, IN
12/1998 - 08/2000	RICHARD B. VANCE & COMPANY	3656	JOLIET, IL
06/1997 - 10/1998	MORGAN KEEGAN & COMPANY, INC.	4161	MEMPHIS, TN
08/1994 - 07/1997	H.J. MEYERS & CO., INC.	15609	ROCHESTER, NY
06/1991 - 09/1994	HIBBARD BROWN & CO., INC.	18246	NEW YORK, NY
08/1994 - 08/1994	WESTFIELD FINANCIAL CORPORATION	8143	NEW YORK, NY

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment Dates	Employer Name	Employer Location
05/2011 - Present	CCG, INC.	INDIANAPOLIS, IN
01/2012 - 06/2012	CHAMPION SECURITIES CO. LLC	SAN FRANCISCO, CA
05/2009 - 04/2011	INDIANA SECURITIES, LLC	INDIANAPOLIS, IN

Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

CCG INC LOCATED IN CARMEL, INDIANA PROVIDES CONSULTING SERVICES TO CORPORATE AND NON-FOR-PROFIT CORPORATIONS WITH REGARDS TO FINANCIAL ANALYSIS OF THEIR CORPORATE STRUCTURES. I AM CURRENTLY WRAPPING UP FINAL COMPANY BUSINESS AND WILL BE SHUTTING THE COMPANY DOWN.

Registration and Employment History



Other Business Activities, continued

SECOND DISCLOSURE: FARMGROWCAP LLC ("FGC"), LOCATED IN CARMEL, INDIANA, PROVIDES CONSULTING SERVICES TO AGRIBUSINESS LOCATED THROUGHOUT THE UNITED STATES. THIS BUSINESS MAY ALSO PROVIDE INVESTMENT RELATED SERVICES IN THE FORM OF SECURED FINANCINGS TO AGRIBUSINESSES TO SUPPORT THEIR ANNUAL CROP PRODUCTION. I SERVE AS A CONSULTANT TO THIS BUSINESS, AND DEVOTE APPROXIMATELY 20 HOURS PER MONTH ON FGC RELATED ACTIVITIES. MY SPECIFIC RESPONSIBILITIES ARE TO ORIGINATE RELATIONSHIPS WITH NEW BUSINESSES AND PROVIDE AN EVALUATION OF THEIR STRATEGIC/ FINANCIAL NEEDS, OR CORPORATE STRUCTURES, ASAPPLICABLE. IN THE EVENT THAT FGC ACTS AS A PRINCIPAL IN A TRANSACTION, I WILL BE RESPONSIBLE FOR WORKING WITH OTHERS IN STRUCTURING THE TRANSACTION AND MONITORING THE CREDIT. SIMILAR CONSULTING AND INVESTMENT-RELATED SERVICES MAY BE PROVIDED TO THE BLUEBERRY INDUSTRY THROUGH BLUE CROP GROUP LLC.



Disclosure Events

What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - o A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
 - o
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
 - o
4. **There are different statuses and dispositions for disclosure events:**
 - o A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - § A "pending" event involves allegations that have not been proven or formally adjudicated.
 - § An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - § A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - § An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - § A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that brokers and brokerage firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - § A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	18	0



Civil Event	0	1	0
Customer Dispute	0	1	N/A
Termination	N/A	1	N/A
Judgment/Lien	7	N/A	N/A



Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 18

Reporting Source:	Regulator
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Other: n/a
Date Initiated:	04/26/2018
Docket/Case Number:	3-18458
Employing firm when activity occurred which led to the regulatory action:	n/a
Product Type:	No Product
Allegations:	SEC Admin Release 34-83121/April 26, 2018: The Securities and Exchange Commission (Commission) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 (Exchange Act) against Tobin J. Senefeld. On February 6, 2018, a final judgment was entered against Senefeld in the amount of \$698,818.29 in disgorgement, \$94,538.36 in prejudgment interest, and a civil penalty of \$50,000. This final judgment incorporated an October 11, 2017 judgment that was entered by consent against Senefeld permanently enjoining Senefeld from future violations of Section 17(a) of the Securities Act of 1933 (Securities Act), Section 10(b) of the Exchange Act, and Rule 10b-5



thereunder, in the civil action entitled Securities and Exchange Commission v. Senefeld, et al., Civil Action Number 1:15-CV-659, in the United States District Court for the Southern District of Indiana.

Current Status: Final

Resolution: Order

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 05/25/2018

Sanctions Ordered: Bar (Permanent)

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise? No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?



(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 2

Sanction Type: Bar (Permanent)
Capacities Affected: participating in any offering of a penny stock
Duration: Indefinite
Start Date: 05/25/2018

End Date:

Sanction 2 of 2



Sanction Type:	Bar (Permanent)
Capacities Affected:	association with a broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or NRSRO
Duration:	Indefinite
Start Date:	05/25/2018
End Date:	
Regulator Statement	<p>SEC Admin Release 34-83331 / May 25, 2018: Respondent consented to the entry of an Order Making Findings and Imposing Remedial Sanctions. It is ORDERED that Senefeld be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.</p>

Disclosure 2 of 18

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	
Date Initiated:	10/11/2016
Docket/Case Number:	2015045728801
Employing firm when activity occurred which led to the regulatory action:	Pin Financial, LLC
Product Type:	No Product
Allegations:	Without admitting or denying the findings, Senefeld consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony related to allegations that he participated in a Ponzi scheme.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Resolution Date:

10/11/2016

Sanctions Ordered:

Bar (Permanent)

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?



(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type:	Bar (Permanent)
Capacities Affected:	All Capacities
Duration:	Indefinite
Start Date:	10/11/2016
End Date:	



Disclosure 3 of 18

Reporting Source:	Broker
Regulatory Action Initiated By:	MARYLAND DIVISION OF SECURITIES
Sanction(s) Sought:	Denial
Date Initiated:	11/19/1999
Docket/Case Number:	9900026
Employing firm when activity occurred which led to the regulatory action:	HJ MEYERS & CO
Product Type:	Equity-OTC
Allegations:	ACTION RESULTING IN SEC RECORD DUE TO 6/30/99 SEC ACTION.
Current Status:	Final
Resolution:	Order
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	11/19/1999
Sanctions Ordered:	Denial Other: REGISTRATION DENIED AS A RESULT OF SEC ACTION 6/30/99 WITH SUSPENSION CEASES & DISIST AND FINE.
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$25,000.00
Portion Levied against individual:	\$25,000.00
Payment Plan:	\$25K FINE IN INSTALLMENTS BEGINNING WITH THE \$10K WITHIN 30 DAYS FROM 6/30/099 AND ENDING WITH 15K WITHIN 12 MONTHS



Is Payment Plan Current: Yes
Date Paid by individual: 06/30/2000
Was any portion of penalty waived? No
Amount Waived:

Disclosure 4 of 18

Reporting Source: Broker
Regulatory Action Initiated By: MARYLAND DIVISION OF SECURITIES
Sanction(s) Sought: Denial
 Suspension
Date Initiated: 02/10/1999
Docket/Case Number: 99-050
Employing firm when activity occurred which led to the regulatory action: H J MEYERS & CO INC
Product Type: Equity-OTC
Allegations: REGISTRATION DENIED DUE TO SEC ACTION 06/30/1999
Current Status: Final
Resolution: Settled
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes
Resolution Date: 02/10/1999
Sanctions Ordered: Denial
Sanction 1 of 1
Sanction Type: Suspension
Capacities Affected: GENERAL SECURITIES PRINCIPAL



Duration:	1 YEAR COMMENCING 7-11-99
Start Date:	07/11/1999
End Date:	07/11/2000
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$25,000.00
Portion Levied against individual:	\$25,000.00
Payment Plan:	\$25K FIND IN INSTALLMENTS BEGINNING WITH THE \$10K WITHING 30 DAYS FROM 6/30/99 AND ENDING WITH 15K WITHIN 12 MONTHS WITH MORGAN
Is Payment Plan Current:	Yes
Date Paid by individual:	06/30/2000
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	SUBJECT OF AN ORDER ISSUED BY SEC

Disclosure 5 of 18

Reporting Source:	Regulator
Regulatory Action Initiated By:	STATE OF MICHIGAN
Sanction(s) Sought:	Revocation
Other Sanction(s) Sought:	CENSURE, REVOKE AND DENY EXEMPTIONS, AND TO CEASE AND DESIST
Date Initiated:	05/02/2000
Docket/Case Number:	SA-0331
Employing firm when activity occurred which led to the regulatory action:	H.J. MEYERS & CO., INC.
Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	



Allegations: SUBJECT TO AN ORDER ISSUED BY THE SEC - REGARDING A FREE-RIDING SCHEME.

Current Status: Final

Resolution: Order

Resolution Date: 12/18/2000

Sanctions Ordered: Cease and Desist/Injunction
Censure
Revocation/Expulsion/Denial

Other Sanctions Ordered: REVOKE AND DENY EXEMPTIONS

Sanction Details: FINAL ORDER TO REVOKE AGENT REGISTRATION, TO CENSURE, TO REVOKE AND DENY EXEMPTIONS, AND TO CEASE AND DESIST PURSUANT TO THE MICHIGAN UNIFORM SECURITIES ACT.

Regulator Statement SUBJECT OF AN ORDER ISSUED BY THE SEC

Reporting Source: Broker

Regulatory Action Initiated By: STATE OF MICHIGAN

Sanction(s) Sought: Cease and Desist
Censure
Denial
Revocation

Date Initiated: 05/02/2000

Docket/Case Number: SA-0331

Employing firm when activity occurred which led to the regulatory action: H.J. MEYERS & CO, INC.

Product Type: Equity-OTC

Allegations: SUBJECT TO AN ORDER ISSUED BY THE SEC - REGARDING A FREE-RIDING SCHEME.

Current Status: Final

Resolution: Order



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	12/18/2000
Sanctions Ordered:	Cease and Desist Censure Denial Expulsion Revocation Other: REVOKE AND DENY EXEMPTIONS
Broker Statement	SUBJECT OF AN ORDER ISSUED BY SEC

Disclosure 6 of 18

Reporting Source:	Broker
Regulatory Action Initiated By:	STATE OF TN DEPT OF COMMERCE AND INS. SEC DIVISION
Sanction(s) Sought:	Other
Other Sanction(s) Sought:	
Date Initiated:	11/19/1999
Docket/Case Number:	
Employing firm when activity occurred which led to the regulatory action:	H J MEYERS & CO INC.
Product Type:	Equity - OTC
Other Product Type(s):	FULL SERVICE BROKER
Allegations:	CRD DISCIPLINARY RECORD DUE TO 6/30/99 SEC ACTION.
Current Status:	Final
Resolution:	Other
Resolution Date:	10/19/1999



Disclosure 7 of 18

Reporting Source:	Broker
Regulatory Action Initiated By:	STATE OF TEXAS
Sanction(s) Sought:	Denial
Other Sanction(s) Sought:	
Date Initiated:	01/22/1999
Docket/Case Number:	
Employing firm when activity occurred which led to the regulatory action:	H J MEYERS & CO INC.
Product Type:	Equity - OTC
Other Product Type(s):	FULL SERVICE BROKER
Allegations:	CRD DISCIPLINARY RECORD RE: SEC 6/30/1999 ACTION
Current Status:	Final
Resolution:	Other
Resolution Date:	02/21/1999

Disclosure 8 of 18

Reporting Source:	Broker
Regulatory Action Initiated By:	STATE OF NEBRASKA DEPT OF BANK & FINANCE
Sanction(s) Sought:	Denial
Other Sanction(s) Sought:	
Date Initiated:	02/23/1999
Docket/Case Number:	



Employing firm when activity occurred which led to the regulatory action: H J MEYERS & CO. INC
Product Type: Equity - OTC
Other Product Type(s): FULL SERVICE BROKER/DEALER
Allegations: SEC ACTION ON 6/30/99 RESULTED IN DENIAL OF REGISTRATION
Current Status: Final
Resolution: Other
Resolution Date: 04/02/1999

Disclosure 9 of 18

Reporting Source: Broker
Regulatory Action Initiated By: ARIZONA CORPORATION COMMISSION SECURITIES DIVISION
Sanction(s) Sought: Denial
Other Sanction(s) Sought:
Date Initiated: 03/12/1999
Docket/Case Number:
Employing firm when activity occurred which led to the regulatory action: H J MEYERS & CO INC.
Product Type: Equity - OTC
Other Product Type(s): FULL SERVICE BROKER
Allegations: RELATES TO SEC ACTION ON 6/30/99 WITH SUSPENSION FINE & CEASE & DESIST
Current Status: Final
Resolution: Other
Resolution Date: 03/26/1999



Disclosure 10 of 18

Reporting Source:	Broker
Regulatory Action Initiated By:	STATE OF NEW HAMPSHIRE DEPT OF SECURITIES
Sanction(s) Sought:	Denial
Other Sanction(s) Sought:	
Date Initiated:	04/21/1999
Docket/Case Number:	
Employing firm when activity occurred which led to the regulatory action:	H J MEYERS & CO. INC.
Product Type:	Equity - OTC
Other Product Type(s):	FULL SERVICE BROKER
Allegations:	REGISTRATION DENIED AS A RESULT OF SEC ACTION 6/30/1999 WITH SUSPENSION CEASE & DESIST & FINE
Current Status:	Final
Resolution:	Other
Resolution Date:	11/21/1999

Disclosure 11 of 18

Reporting Source:	Broker
Regulatory Action Initiated By:	OHIO DEPT. DIV. OF SECURITIES
Sanction(s) Sought:	Denial
Date Initiated:	02/10/1999
Docket/Case Number:	99-055
Employing firm when activity occurred which led to the regulatory action:	H J MEYERS & CO. INC
Product Type:	Equity-OTC



Allegations: REGISTRATION DENIED DUE TO CES ACTION 06/30/1999

Current Status: Final

Resolution: Settled

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Resolution Date: 02/10/1999

Sanctions Ordered: Denial

Disclosure 12 of 18

Reporting Source: Regulator

Regulatory Action Initiated By: STATE OF INDIANA

Sanction(s) Sought: Revocation

Other Sanction(s) Sought:

Date Initiated: 12/21/1999

Docket/Case Number: 99-0636 SC

Employing firm when activity occurred which led to the regulatory action: VANCE & CO.

Product Type: No Product

Other Product Type(s):

Allegations: THE COMMISSIONER ISSUED AN ORDER OF SHOW CAUSE FOR AGENT REGISTRATION REVOCATION BASED UPON FILING WITH THE CRD OF DISCLOSABLE EVENTS CONCERNING INVESTMENT-RELATED MATTERS, CUSTOMER INITIATED COMPLAINTS, AND/OR OTHER PROCEEDINGS.

Current Status: Pending



Reporting Source: Broker
Regulatory Action Initiated By: STATE OF INDIANA OFFICE OF THE SECRETARY OF STATE SECURITIES
Sanction(s) Sought: Denial
Other Sanction(s) Sought:
Date Initiated: 12/23/1999
Docket/Case Number: 99-063656
Employing firm when activity occurred which led to the regulatory action: H J MEYERS & CO. INC
Product Type: Equity - OTC
Other Product Type(s): FULL SERVICE BROKER DEALER
Allegations: US SEC ACTION RESULTING IN CEASE AND DESIST FINE AND SUSPENSION 6/30/99
Current Status: Final
Resolution: Other
Resolution Date: 12/23/1999

Disclosure 13 of 18

Reporting Source: Regulator
Regulatory Action Initiated By: GEORGIA SECURITIES DIVISION
Sanction(s) Sought: Denial
Other Sanction(s) Sought:
Date Initiated: 04/28/1999
Docket/Case Number: 71-99-1670
Employing firm when activity occurred which led to the regulatory action: VANCE & COMPANY
Product Type: No Product

**Other Product Type(s):**

Allegations: DISHONEST AND UNETHICAL BUSINESS PRACTICES; UNLAWFUL PRACTICES; SALESMAN "NOT OF GOOD BUSINESS REPUTATION"

Current Status: Final

Resolution: Order

Resolution Date: 05/24/1999

Sanctions Ordered: Revocation/Expulsion/Denial

Other Sanctions Ordered:

Sanction Details: APPLICATION FOR REGISTRATION OF TOBIN SENEFELD WITH VANCE & CO. IS REFUSED FOR REGISTRATION.

Regulator Statement SENEFELD'S REGISTRATION APPLICATION INDICATED A PATTERN OF ACTS WHICH WOULD CONSTITUTE VIOLATIONS OF THE GEORGIA SECURITIES ACT; NEITHER SENEFELD OR VANCE & CO. RESPONDED TO GEORGIA'S REQUEST FOR ADDITIONAL INFORMATION. ORDER OF REFUSAL TO REGISTER ENTERED MAY 24, 1999.

Reporting Source: Broker

Regulatory Action Initiated By: GEORGIA SECRETARY OF STATE DEPT. OF SECURITIES

Sanction(s) Sought: Denial

Other Sanction(s) Sought:

Date Initiated: 03/16/1999

Docket/Case Number: 71-99-001670

Employing firm when activity occurred which led to the regulatory action: H J MEYERS & CO INC.

Product Type: Equity - OTC

Other Product Type(s): FULL SERVICE BROKER DEALER

Allegations: 6/30/1999 SEC ACTION RESULTING IN FINE CEASE AND DESIST & SUSPENSION RESULTING IN CRN DISCIPLINARY RECORD.

Current Status: Final



Resolution: Other
Resolution Date: 03/16/1999

Disclosure 14 of 18

Reporting Source: Regulator
Regulatory Action Initiated By: ILLINOIS SECURITIES DEPARTMENT
Sanction(s) Sought: Denial
Other Sanction(s) Sought:
Date Initiated: 07/14/1999
Docket/Case Number: 9900026
Employing firm when activity occurred which led to the regulatory action: VANCE & CO.
Product Type: No Product
Other Product Type(s):
Allegations: THE RESPONDENT'S SALESPERSON REGISTRATION IS SUBJECT TO DENIAL BASED UPON AN SEC ORDER MAKING FINDINGS AND IMPOSING SANCTIONS, ADMINISTRATIVE PROCEEDING FILE NO. 3-9754.
Current Status: Final
Resolution: Order
Resolution Date: 11/19/1999
Sanctions Ordered: Revocation/Expulsion/Denial
Other Sanctions Ordered:
Sanction Details: A SUMMARY ORDER OF DENIAL WAS ISSUED, JULY 14, 1999. THE RESPONDENT HAS THIRTY DAYS AFTER RECEIPT OF THIS ORDER IN WHICH TO REQUEST A HEARING IF NO SUCH REQUEST IS MADE WITHIN THAT TIME PERIOD, THE SUMMARY ORDER WILL BECOME FINAL.
Regulator Statement AN ORDER OF DENIAL WAS ISSUED, NOVEMBER 19, 1999. THE RESPONDENT'S APPLICATION FOR REGISTRATION AS A SALESPERSON IN ILLINOIS IS DENIED.



CONTACT: (217) 785-4948

Reporting Source: Broker

Regulatory Action Initiated By: STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

Sanction(s) Sought: Denial

Other Sanction(s) Sought:

Date Initiated: 11/19/1999

Docket/Case Number: FILE #9900026

Employing firm when activity occurred which led to the regulatory action: HJ MEYERS & CO

Product Type: Equity - OTC

Other Product Type(s): FULL SERVICE BROKER

Allegations: SENEFELD'S ACTIVITY PER SEC ACTION OF 6/30/99 REGARDING FREE LOADING AND WITHOLDING

Current Status: Final

Resolution: Other

Resolution Date: 11/19/1999

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: STATE REGISTRATION DENIED

Disclosure 15 of 18

Reporting Source: Regulator

Regulatory Action Initiated By: Maryland Division of Securities

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 04/05/1999



Docket/Case Number: 99-0133

Employing firm when activity occurred which led to the regulatory action:

Product Type:

Other Product Type(s):

Allegations: Senefeld was sent correspondence requesting additional information pertaining to disclosure on the Form U-4. No response was received by the Division.

Current Status: Final

Resolution: Order

Resolution Date: 04/05/1999

Sanctions Ordered: Revocation/Expulsion/Denial

Other Sanctions Ordered:

Sanction Details: An Order to Show cause & Summary Postponement was issued 3/2/99, requiring Senefeld to show cause why his applicaiton should not be denied. The Orders provided that failure to withdraw the application or to request a hearing within 15 days from the date of receipt of the Orders would result in the application being denied.

Regulator Statement No response was received to the Orders and a Final Order of Denial of Agent Registration was issued 4/5/99. CONTACT: ELLEN E. CHERRY, (410) 576-6494.

Reporting Source: Broker

Regulatory Action Initiated By: MARYLAND DIVISION OF SECURITIES / OCCURANCE 333873

Sanction(s) Sought: Denial
Expulsion
Revocation

Date Initiated: 04/05/1999

Docket/Case Number: 99-0133



Employing firm when activity occurred which led to the regulatory action: HJ MEYERS & CO

Product Type: Equity-OTC

Allegations: FREE RIDING

Current Status: Final

Resolution: REVOCATION/EXPULSION/DENIAL

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Resolution Date: 05/05/1999

Sanctions Ordered: Denial
Expulsion
Revocation

Disclosure 16 of 18

Reporting Source: Regulator

Regulatory Action Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 03/09/1999

Docket/Case Number: C11990009

Employing firm when activity occurred which led to the regulatory action:

Product Type: Other

Other Product Type(s):

Allegations: LTR: 04/06/99, TRK: 8/02/99, TO BD# 3656, CODES: B,O,P,Q,T



4/5/99GS: ON MARCH 9, 1999, DISTRICT NO. 11 NOTIFIED RESPONDENT TOBIN J. SENEFELD THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. C11990009 WAS ACCEPTED; THEREFORE, HE IS CENSURED, FINED \$5,000 AND SUSPENDED FROM ASSOCIATION WITH ANY NASD MEMBER IN ANY PRINCIPAL CAPACITY FOR 20 DAYS - (NASD RULES 2110 AND 3010 - RESPONDENT SENEFELD FAILED TO TAKE APPROPRIATE ACTION TO SUPERVISE A REGISTERED REPRESENTATIVE THAT WAS REASONABLY DESIGNED TO PREVENT SUITABILITY VIOLATIONS BY THE REGISTERED REPRESENTATIVE AND ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS AND WITH THE RULES OF THE NASD).

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/09/1999

Sanctions Ordered: Censure
Monetary/Fine \$5,000.00
Suspension

Other Sanctions Ordered:

Sanction Details: FINED \$5,000

Regulator Statement 11-24-99, \$5,000 PAID ON 6/25/99, INVOICE #99-11-258

Reporting Source: Broker

Regulatory Action Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS REGULATION INC

Sanction(s) Sought: Suspension

Other Sanction(s) Sought: 5K FINE

Date Initiated: 03/16/1999

Docket/Case Number: C11990009

Employing firm when activity occurred which led to the regulatory action: H J MEYERS & CO. INC

Product Type: Equity - OTC

Other Product Type(s): FULL SERVICE BROKERAGE FIRM



Allegations: FAILURE TO SUPERVISE H J MEYERS RR FOR TRANSACTIONS IN CUSTOMER H J'S AGREEMENT REGARDING SUITABILITY AND EXCESSIVE TRADING. SENEFELD WAS BOM

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/09/1999

Sanctions Ordered: Monetary/Fine \$5,000.00
Suspension

Other Sanctions Ordered:

Sanction Details: SUSPENSION WAS FOR ACTION IN PRINICAP CAPCIEY FROM 4/19/99 TO 5/7/99. THE FINE WAS PAID IN INSTALLMENTS OF \$1,250 AS DIRECTED BY NASDR

Disclosure 17 of 18

Reporting Source: Regulator

Regulatory Action Initiated By: IN

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 01/13/1999

Docket/Case Number: 99-0004 RA

Employing firm when activity occurred which led to the regulatory action:

Product Type:

Other Product Type(s):

Allegations: DISCIPLINARY HISTORY RAISED QUESTIONS REGARDING ISSUING AN AGENT REGISTRATION IN INDIANA..

Current Status: Final

Resolution: Order

Resolution Date: 01/13/1999

**Sanctions Ordered:****Other Sanctions Ordered:****Sanction Details:**

FILED ORDER OF RESTRICTIVE AGREEMENT ON
1/13/1999.

Regulator Statement

THE AGENT HAS APPLIED FOR REGISTRATION INN
INDIANA. AFTER REVIEW OF HIS DISCIPLINARY HISTORY, THE DIVISION
FILED AN ORDER OF POSTPONEMENT OF AGENT REGISTRATION. THE
AGENT
WAS ORDERED TO RESPOND TO EACH OF DISCIPLINARY EVENTS. AFTER
REVIEW OF THE SUBMITTALS, THE AGENT'S REGISTRATION WAS
APPROVED
WITH RESTRICTIONS PURSUANT TO AN ORDER OF RESTRICTIVE
AGREEMENT
THAT INCLUDES BUT LIMITED TO: 1) STRICT SUPERVISION, 2) NO
DISCRETIONARY AUTHORITY OVER INDIANA ACCOUNTS, 3) APPROVAL BY
THE BRANCH MANAGER OF NEW ACCOUNTS, 4) NOTIFICATION TO THE
DIVISION OF ANY COMPLAINTS, AND 5) COMPLIANCE WITH ALL
STATE/FEDERAL SECURITIES LAWS. CONTACT: KATHLEEN
GUYMON-BLACKHAM (317) 232-6681

Reporting Source:

Broker

**Regulatory Action Initiated
By:**

STATE OF INDIANA SEC OF STATE

Sanction(s) Sought:

Other: RESTRICTION

Date Initiated:

01/13/1999

Docket/Case Number:

99-0004 RA

**Employing firm when activity
occurred which led to the
regulatory action:**

HJ MEYERS

Product Type:

Equity-OTC
Other: FULL SERVICE BROKER DEALER

Allegations:

STATE OF INDIANA RESTRICTED SENEFFELD FROM ACTING IN A
SUPERVISORY CAPACITY.

Current Status:

Final

Resolution:

Order



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Resolution Date: 01/13/1999

Sanctions Ordered: Other: RESTRICTIVE AGREEMENT WAS AGREED TO BY MYSELF, A REPRESENTATIVE OF RICHARD B VANCE AND THE STAFF OF INDIANA. THE SEC OF THE STATE OF INDIANA THEN APPROVED MY LICENSE IN THE STATE.

Broker Statement RESTRICTIVE AGREEMENT WAS AGREED TO BY MYSELF, A REPRESENTATIVE OF RICHARD B VANCE AND THE STAFF OF INDIANA. THE SEC OF THE STATE OF INDIANA THEN APPROVED MY LICENSE IN THE STATE.

Disclosure 18 of 18

Reporting Source: Regulator

Regulatory Action Initiated By: SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 09/30/1998

Docket/Case Number:

Employing firm when activity occurred which led to the regulatory action: H.J. MEYERS & CO., INC.

Product Type:

Other Product Type(s):

Allegations:

Current Status: Final

Resolution: Settled

Resolution Date: 06/30/1999

**Sanctions Ordered:**

Cease and Desist/Injunction
 Monetary/Fine \$25,000.00
 Suspension

Other Sanctions Ordered:**Sanction Details:****Regulator Statement**

LTR: 07/02/99, TRK: 8/02/99, TO BD# 3656, CODES: B,O,P,Q,T
 10/2/98JW SEC NEWS DIGEST ISSUE 98-190 DATED 10/01/1998,
 ENFORCEMENT PROCEEDINGS DISCLOSED: The Commission instituted
 administrative and cease and desist proceedings against H.J.
 Meyers and Tobin J. Senefeld, the former branch manager of H.J.
 Meyers' Boston branch office and Rita K. Savla's supervisor.
 The Commission charged Senefeld with participating with Savla
 in the free-riding scheme. The Commission charged H.J. Meyers
 with failing reasonably to supervise Savla and Senefeld. The
 Commission also announced that it filed a complaint against
 Rita K. Savla, a former registered representative of H.J.
 Meyers & Co., Inc. (Rel. 34-40510, File No. 3-9754 - Adm. Proc.
 against H.J. Meyers & Co. and Tobin J. Senefeld) [SEC v. Rita
 K. Savla, Civil No. 98-CV-119 84, EFH, D.Mass.] (LR-15915)

+07/02/99+ SEC NEWS DIGEST, ISSUE NO. 99-126, DATED JULY 1,
 1999, DISCLOSES: On 6/30/99, the Commission and Tobin Senefeld,
 branch manager of H.J. Meyers & Co., Inc.'s, settled
 administrative proceedings in which Senefeld was charged with
 violating the antifraud and credit extension provisions of the
 federal securities laws. As part of the settlement, Senefeld
 was ordered to cease and desist from committing or causing any
 violations and any future violations of the antifraud and
 credit extension provisions, suspended from association with
 any broker or dealer for 12 months, and ordered to pay a
 \$25,000 penalty. The Commission's Order found that Senefeld and
 Savla participated in a free-riding scheme in which they
 purchased 106,000 shares of stock in nominee accounts at a cost
 of more than \$1.6 million without any intention or ability to
 pay for the purchases. According to the Order, Senefeld's
 trading resulted in approximately \$49,000 in losses in the
 accounts he controlled. Senefeld neither admitted nor denied
 the findings. (Re*See FAQ #1*

Reporting Source:

Firm



Regulatory Action Initiated By: SEC

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 09/30/1998

Docket/Case Number:

Employing firm when activity occurred which led to the regulatory action: H.J. MEYERS & CO., INC.

Product Type:

Other Product Type(s):

Allegations: VIOLATIONS OF SECTION 17(A) OF THE SECURITIES ACT 7(C), 7(F), 10(B), 15(B), 4(E) & 15(B)(6) OF THE EXCHANGE ACT: SEEKING CEASE & DESIST ORDER & UNSPECIFIED MONETARY PENALTY

Current Status: Final

Resolution: Settled

Resolution Date: 06/30/1999

Sanctions Ordered: Cease and Desist/Injunction
Monetary/Fine \$25,000.00
Suspension

Other Sanctions Ordered:

Sanction Details: N/A

Firm Statement MR. SENEFFELD DENIES ALL ALLEGATIONS OF WRONGDOING. ALL ALLEGATIONS RELATE TO MATTERS OCCURRING PRIOR TO THIS EMPLOYMENT WITH MORGAN KREGAN & CO. INC & VANCE & CO.

Reporting Source: Broker

Regulatory Action Initiated By: ***22I(2) WAS ANSWERED ON THE DRP***SEC

Sanction(s) Sought: Cease and Desist
Suspension



Other: \$25K FINE AND CEASE AND DESIST

Date Initiated: 09/30/1998

Docket/Case Number: 00-0004

Employing firm when activity occurred which led to the regulatory action: H.J. MEYERS & CO., INC.

Product Type: Equity Listed (Common & Preferred Stock)
Other: FULL SERVICE BROKER/DEALER

Allegations: VIOLATION OF SECTION 17(A) OF THE SECURITIES ACT AND SECTION 7(C), 7(F), 10(B) 15(B), 4(E) AND 15(B) 6 OF THE EXCHANGE ACT. SEEKING CEASE AND DESIST ORDER & UNSPECIFIED MONATARY PENALTY.
ALLEGATIONS OF PARTICIPATING IN FREE RIDING SCHEME WITH ANOOTHER EMPLOYEE. FAILURE TO SUPERVISE THAT EMPLOYEE LOSSES IN ACCOUNTS CONTROLLED BY SENEFELD AMOUNTED TO \$49,393.

Current Status: Final

Resolution: Settled

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Resolution Date: 06/30/1999

Sanctions Ordered: Cease and Desist
Monetary Penalty other than Fines
Suspension

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: GENERAL SECURITIES PRINCIPAL

Duration: 1 YEAR COMMENCING 7-11-99

Start Date: 07/11/1999

End Date: 07/11/2000

**Monetary Sanction 1 of 1**

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$25,000.00

Portion Levied against individual: \$25,000.00

Payment Plan: \$25K FINE IN INSTALLMENTS BEGINNING WITH THE \$10K WITHING 30 DAYS FROM 06/30/99 AND ENDING WITH 15K WITHIN 12 MONTHS

Is Payment Plan Current: Yes

Date Paid by individual: 06/30/2000

Was any portion of penalty waived? No

Amount Waived:

Broker Statement I DENY ALL ALLEGATIONS OF WRONGDOING ALL ALLEGATIONS RELATE TO MATTERS OCCURING PRIOR TO MY EMPLOYMENT. SUSPENDED FOR 1 YEAR SUPENSION COMMENING 7-11-99. SENEFELD TO THE BEST OF MY KNOWLEDGE IS PAYING THE \$25K FINE IN INSTALLMENTS BEGINNING WITH THE \$10K WITHING 30 DAYS FROM 06/30/99 AND ENDING WITH 15K WITHIN 12 MONTHS WITH MORGAN KEEGAN.



Civil - Final

This type of disclosure event involves (1) an injunction issued by a court in connection with investment-related activity, (2) a finding by a court of a violation of any investment-related statute or regulation, or (3) an action brought by a state or foreign financial regulatory authority that is dismissed by a court pursuant to a settlement agreement.

Disclosure 1 of 1

Reporting Source:	Regulator
Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Relief Sought:	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction
Date Court Action Filed:	04/24/2015
Product Type:	Other: PONZI SCHEME
Type of Court:	Federal Court
Name of Court:	THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA
Location of Court:	INDIANAPOLIS, INDIANA
Docket/Case #:	15-CV-00659
Employing firm when activity occurred which led to the action:	VEROS PARTNERS, INC.
Allegations:	SEC LITIGATION RELEASE 23246 / APRIL 24, 2015: THE SECURITIES AND EXCHANGE COMMISSION ANNOUNCED CHARGES AGAINST AN INDIANAPOLIS INVESTMENT ADVISER, ITS PRESIDENT, TWO ASSOCIATES, INCLUDING TOBIN J. SENEFFELD, AND SEVERAL AFFILIATED COMPANIES FOR ENGAGING IN TWO FRAUDULENT FARM LOAN OFFERINGS, IN WHICH THEY MADE PONZI SCHEME PAYMENTS TO INVESTORS IN OTHER OFFERINGS AND PAID THEMSELVES HUNDREDS OF THOUSANDS OF DOLLARS IN UNDISCLOSED FEES. THE SEC OBTAINED A TEMPORARY RESTRAINING ORDER AND EMERGENCY ASSET FREEZE TO HALT THE SCHEME. THE SEC'S COMPLAINT CHARGED THE DEFENDANT WITH VIOLATING SECTION 17(A) OF THE SECURITIES ACT OF 1933, SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 10B-5. ACCORDING TO THE SEC'S COMPLAINT, FILED IN THE U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA, IN 2013 AND 2014, THE DEFENDANTS FRAUDULENTLY RAISED AT LEAST \$15 MILLION FROM AT LEAST 80 INVESTORS, MOST OF WHOM WERE THE INVESTMENT ADVISER'S CLIENTS. THE INVESTORS WERE INFORMED THAT THEIR



FUNDS WOULD BE USED TO MAKE SHORT-TERM OPERATING LOANS TO FARMERS, BUT INSTEAD, SIGNIFICANT PORTIONS OF THE LOANS WERE TO COVER THE FARMERS' UNPAID DEBT ON LOANS FROM PRIOR OFFERINGS. ACCORDING TO THE SEC'S COMPLAINT, THE PRESIDENT, SENEFELD, AND THE OTHER ASSOCIATE USED MONEY FROM THE TWO OFFERINGS TO PAY MILLIONS OF DOLLARS TO INVESTORS IN PRIOR FARM LOAN OFFERINGS AND TO PAY THEMSELVES OVER \$800,000 IN UNDISCLOSED "SUCCESS" AND "INTEREST RATE SPREAD" FEES.

Current Status: Final

Resolution: Judgment Rendered

Resolution Date: 10/11/2017

Sanctions Ordered or Relief Granted: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Injunction
Monetary Penalty other than Fines

Capacities 1 of 1

Capacities Affected: n/a

Duration: permanent

Start Date: 10/11/2017

End Date:

Monetary Sanction 1 of 3

Monetary Sanction: Disgorgement

Total Amount: \$698,818.29

Portion against individual: 698818.29

Date Paid:

Portion Waived: No

Amount Waived:

Monetary Sanction 2 of 3

Monetary Sanction: Monetary Fine

Total Amount: \$50,000.00

Portion against individual: 50000

Date Paid:



Portion Waived: No

Amount Waived:

Monetary Sanction 3 of 3

Monetary Sanction: Prejudgment Interest

Total Amount: \$94,538.36

Portion against individual: 94538.36

Date Paid:

Portion Waived: No

Amount Waived:

Regulator Statement

ON MAY 7, 2015, THE COURT CONSIDERED THE MOTION FOR A TEMPORARY RESTRAINING ORDER AND OTHER EQUITABLE RELIEF FILED BY THE COMMISSION. ACCORDINGLY, IT IS HEREBY ORDERED THAT: SENEFELD IS PRELIMINARILY ENJOINED FROM VIOLATING SECTION 17(A) OF THE SECURITIES ACT OF 1933 (SECURITIES ACT); SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 (EXCHANGE ACT) AND RULE 10B-5 THEREUNDER; PROHIBITED FROM SOLICITING, ACCEPTING, OR DEPOSITING ANY MONIES FROM ACTUAL OR PROSPECTIVE INVESTORS PENDING THE RESOLUTION OF THIS ACTION, UNLESS SPECIFICALLY REQUESTED, AUTHORIZED AND/OR APPROVED TO DO SO BY THE RECEIVER, EXCEPT THAT SENEFELD MAY CONTINUE TO ACT AS PRESIDENT AND CEO OF PIN FINANCIAL UNDER THE SUPERVISION OF THE RECEIVER; FUNDS AND ASSETS ARE HEREBY FROZEN; SENEFELD SHALL SUBMIT IN WRITING AND SERVE UPON THE COMMISSION, WITHIN 14 BUSINESS DAYS FOLLOWING SERVICE OF THIS ORDER UPON SENEFELD, AN ACCOUNTING; AND REQUIRED TO PRESERVE DOCUMENTS. THIS PRELIMINARY INJUNCTION SHALL REMAIN IN EFFECT UNTIL ENTRY OF A FINAL JUDGMENT IN, OR OTHER DISPOSITION OF THIS ACTION, AND PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 65(C), NO SECURITY IS REQUIRED OF THE COMMISSION.

On October 11, 2017, a judgment was issued that permanently enjoined Senefeld from future violations of Section 17(a) of the Securities Act, Section 10(b) of the Exchange Act, and Rule 10b-5 thereunder. On February 6, 2018, a final judgment was issued which incorporated the October 11, 2017 judgment. The final judgment ordered Senefeld to pay \$698,818.29 in disgorgement, \$94,538.36 in prejudgment interest, and a civil penalty of \$50,000.

Reporting Source: Broker

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION



Relief Sought: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Injunction

Date Court Action Filed: 04/27/2015

Date Notice/Process Served: 04/27/2015

Product Type: Direct Investment-DPP & LP Interests

Type of Court: Federal Court

Name of Court: US DISTRICT COURT

Location of Court: SOUTHERN DISTRICT INDIANA

Docket/Case #: 15-CV-659-JMS-MJD

Employing firm when activity occurred which led to the action: PIN FINANCIAL, LLC

Allegations: ON APRIL 24, 2015, THE SEC BROUGHT AN ACTION AGAINST SENEFFELD AND OTHERS, ALLEGING SECURITIES FRAUD IN VIOLATION OF FEDERAL SECURITIES LAWS. THE SEC ALLEGES THE DEFENDANTS ENGAGED IN FRAUD, MAKING MATERIAL MISREPRESENTATIONS (AND MATERIAL OMISSIONS) BY STATING INVESTOR FUNDS WOULD BE USED TO MAKE OPERATING LOANS TO FARMERS, WHEN THE FUNDS WERE INSTEAD USED TO REFINANCE PRIOR LOANS. THE SEC ALSO ALLEGES THEY FAILED TO DISCLOSE CERTAIN FEES AND THAT THEY MISCHARACTERIZED A 1999 SETTLEMENT BETWEEN SENEFFELD AND THE SEC.

Current Status: Pending

Limitations or Restrictions in Effect During Appeal: MAY 7 2015 COURT ENTERED AN ORDER APPOINTING A RECEIVER, ENTERED AN ASSET FREEZE AND ORDER AGAINST ALL DEFENDANTS ENJOINING THEM FROM VIOLATING THE FEDERAL SECURITIES LAWS AND FROM SOLICITING INVESTORS, EXCEPT MR. SENEFFELD IS ALLOWED TO SOLICIT INVESTORS IF REQUESTED, AUTHORIZED AND/OR APPROVED TO DO SO BY THE COURT-APPOINTED RECEIVER.



Customer Dispute - Settled

This type of disclosure event involves a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit containing allegations of sale practice violations against the broker that resulted in a monetary settlement to the customer.

Disclosure 1 of 1

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: H.J. MEYERS & CO., INC.

Allegations: ALLEGED MISREPRESENTATION OF PARTICULAR STOCKS. ALLEGED DAMAGES NOT SPECIFIED.

Product Type:

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 08/01/1997

Complaint Pending? No

Status: Settled

Status Date: 11/19/1997

Settlement Amount: \$25,000.00

Individual Contribution Amount: \$0.00

Firm Statement WITHOUT ADMITTING OR DENYING ANY WRONGDOING THE FIRM CLOSED AND CREDITED THE ACCOUNT \$25,000.00 FOR SETTLEMENT PURPOSES ONLY.
Not Provided

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: H.J. MEYERS & CO., INC.

Allegations: ALLEGED MISREPRESENTATION OF PARTICULAR STOCKS. ALLEGED DAMAGES NOT SPECIFIED.

Product Type: Equity Listed (Common & Preferred Stock)



Alleged Damages: \$25,000.00

Is this an oral complaint? Yes

Is this a written complaint?

**Is this an arbitration/CFTC
reparation or civil litigation?**

Customer Complaint Information

Date Complaint Received: 08/01/1997

Complaint Pending? No

Status: Settled

Status Date: 11/19/1997

Settlement Amount: \$25,000.00

**Individual Contribution
Amount:** \$25,000.00

Arbitration Information

Disposition: Settled

Disposition Date: 05/18/1999

Civil Litigation Information

Type of Court: State Court

Name of Court: UNITED STATE DISTRICT COURT, EASTERN DISTRICT OF PENNSYLVANIA

Location of Court: PENNSYLVANIA

Docket/Case #: 99-055

Date Notice/Process Served: 12/15/1997

Litigation Pending? No

Disposition: Settled

Disposition Date: 05/18/1999

**Monetary Compensation
Amount:** \$20,000.00

**Individual Contribution
Amount:** \$20,000.00

Broker Statement VERBAL CUSTOMER COMPLAINTS ARE NOT DISCLOSEABLE



PER NASD RULES THIS IS A VERBAL CUSTOMER COMPLAINT THAT IS NOT DISCLOSABLE.



Employment Separation After Allegations

This type of disclosure event involves a situation where the broker voluntarily resigned, was discharged, or was permitted to resign after being accused of (1) violating investment-related statutes, regulations, rules or industry standards of conduct; (2) fraud or the wrongful taking of property; or (3) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct.

Disclosure 1 of 1

Reporting Source:	Broker
Employer Name:	MORGAN KEEGAN
Termination Type:	Permitted to Resign
Termination Date:	10/26/1998
Allegations:	N/A VIOLATION OF SECTION 17(A) OF SECURITIES ACT & SECTION 7(C), 7(F), 10(B) 15(B), A(E), & 15(B) 6 OF THE EXCHANGE ACT. SEEKING CEASE & DESIST & UNSPECIFIED MONETARY PENALTY.
Product Type:	Equity-OTC
Broker Statement	VOLUNTARY RESIGNATION FROM MORGAN KEEGAN TO FOCUS ON SEC CASE. I DENY ALL ALLEGATIONS OF WRONG DOING. ALL ALLEGATIONS RELATE TO MATTERS OCCURING PRIOR TO MY EMPLOYMENT WITH MORGAN KEEGAN



Judgment / Lien

This type of disclosure event involves an unsatisfied and outstanding judgments or liens against the broker.

Disclosure 1 of 7

Reporting Source:	Broker
Judgment/Lien Holder:	INTERNAL REVENUE SERVICE
Judgment/Lien Amount:	\$11,776.01
Judgment/Lien Type:	Tax
Date Filed with Court:	11/13/2012
Date Individual Learned:	10/01/2013
Type of Court:	INTERNAL REVENUE SERVICE
Name of Court:	INTERNAL REVENUE SERVICE
Location of Court:	INTERNAL REVENUE SERVICE
Docket/Case #:	A201200124079
Judgment/Lien Outstanding?	Yes
Broker Statement	OFFER IN COMPROMISE SUBMITTED BY MY TAX ATTORNEY ON 1/17/13, EXPECT RESPONSE SHORTLY

Disclosure 2 of 7

Reporting Source:	Broker
Judgment/Lien Holder:	INTERNAL REVENUE SERVICE
Judgment/Lien Amount:	\$29,818.76
Judgment/Lien Type:	Tax
Date Filed with Court:	12/18/2009
Date Individual Learned:	10/01/2013
Type of Court:	INTERNAL REVENUE SERVICE
Name of Court:	INTERNAL REVENUE SERVICE
Location of Court:	INTERNAL REVENUE SERVICE
Docket/Case #:	A200900141472
Judgment/Lien Outstanding?	Yes



Broker Statement OFFER IN COMPROMISE SUBMITTED BY MY TAX ATTORNEY ON 1/17/13,
EXPECT RESPONSE SHORTLY

Disclosure 3 of 7

Reporting Source: Broker
Judgment/Lien Holder: INDIANA REVENUE SERVICE
Judgment/Lien Amount: \$3,394.84
Judgment/Lien Type: Tax
Date Filed with Court: 11/19/2012
Date Individual Learned: 10/01/2013
Type of Court: State Court
Name of Court: MARION COUNTY COURT
Location of Court: INDIANAAPOLI, IN
Docket/Case #: 9283655
Judgment/Lien Outstanding? Yes
Broker Statement ON PAYMENT PLAN MONTHLY PAYMENTS IN AMOUNT OF 300.00
CURRENTLY BEING MADE

Disclosure 4 of 7

Reporting Source: Broker
Judgment/Lien Holder: INDIANA REVENUE SERVICE
Judgment/Lien Amount: \$13,598.96
Judgment/Lien Type: Tax
Date Filed with Court: 12/26/2012
Date Individual Learned: 10/01/2013
Type of Court: State Court
Name of Court: MARION COUNTY COURT
Location of Court: INDIANAPOLIS, IN
Docket/Case #: 9325714 & 9325715
Judgment/Lien Outstanding? Yes



Broker Statement ON PAYMENT PLAN MONTHLY PAYMENTS IN THE AMOUNT OF 639.00
CURRENTLY BEING MADE

Disclosure 5 of 7

Reporting Source: Broker
Judgment/Lien Holder: INTERNAL REVENUE SERVICE
Judgment/Lien Amount: \$34,706.06
Judgment/Lien Type: Tax
Date Filed with Court: 01/14/2013
Date Individual Learned: 10/01/2013
Type of Court: INTERNAL REVENUE SERVICE
Name of Court: INTERNAL REVENUE SERVICE
Location of Court: INTERNAL REVENUE SERVICE
Docket/Case #: A201300005449
Judgment/Lien Outstanding? Yes

Broker Statement OFFER IN COMPROMISE SUBMITTED BY MY TAX ATTORNEY ON 1/17/13,
EXPECT RESPONSE SHORTLY

Disclosure 6 of 7

Reporting Source: Broker
Judgment/Lien Holder: IRS
Judgment/Lien Amount: \$25,194.00
Judgment/Lien Type: Tax
Date Filed with Court: 09/22/2008
Date Individual Learned: 09/30/2008
Type of Court: INTERNAL REVENUE SERVICE
Name of Court: INTERNAL REVENUE SERVICE
Location of Court: INTERNAL REVENUE SERVICE
Docket/Case #: A200800109815



Judgment/Lien Outstanding? Yes

Broker Statement OFFER IN COMPROMISE SUBMITTED BY MY TAX ATTORNEY ON 1/17/13,
EXPECT RESPONSE SHORTLY

Disclosure 7 of 7

Reporting Source: Broker

Judgment/Lien Holder: IRS

Judgment/Lien Amount: \$171,577.00

Judgment/Lien Type: Tax

Date Filed with Court: 06/30/2008

Date Individual Learned: 07/10/2008

Type of Court: INTERNAL REVENUE SERVICE

Name of Court: INTERNAL REVENUE SERVICE

Location of Court: INTERNAL REVENUE SERVICE

Docket/Case #: A200800076812

Judgment/Lien Outstanding? Yes

Broker Statement OFFER IN COMPROMISE SUBMITTED BY MY TAX ATTORNEY ON 1/17/13,
EXPECT RESPONSE SHORTLY

End of Report



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