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,)
and DINIEDIA NOVAL III C)
PIN FINANCIAL LLC,)
Relief Defendant.)

PLAINTIFF'S MOTION FOR DISGORGEMENT, PREJUDGMENT INTEREST, AND CIVIL PENALTIES AGAINST DEFENDANT TOBIN SENEFELD

Plaintiff U. S. Securities and Exchange Commission ("SEC" or "Plaintiff"), pursuant to the Consent filed on October 10, 2017 [Filing No. 429-2] and the Judgment as to Defendant Tobin J. Senefeld ("Senefeld") entered on October 11, 2017 [Filing No. 436], respectfully moves this Court to order Senefeld to pay disgorgement, prejudgment interest, and civil penalties.

Based on the allegations of fraud contained in the Amended Complaint, which Senefeld agreed to accept as true for the purposes of this motion, and for the reasons stated in the SEC's accompanying memorandum of law and the Declaration of Craig McShane [Filing No. 443], the Court should order Senefeld to pay:

1. \$698,818.29 in disgorgement, representing the ill-gotten proceeds of his

fraud;

- 2. prejudgment interest in the amount of \$94,538.36; and
- 3. civil penalties in an appropriate amount.

Having done so, the Court should then enter final judgment against Senefeld.

November 6, 2017

Respectfully submitted,

By: /s/Doressia L. Hutton
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U.S. SECURITIES AND EXCHANGE
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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2017, I served **PLAINTIFF'S MOTION FOR DISGORGEMENT, PREJUDGMENT INTEREST, AND CIVIL PENALTIES AGAINST DEFENDANT TOBIN SENEFELD** on all counsel of record through the Court's ECF filing system.

/S/DORESSIA L. HUTTON___