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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X
Commodity Futures Trading Commission,

Plaintiff,

v.

Civil Action No. 04 CV 1512

Equity Financial Group LLC,
Tech Traders, Inc.,
Vincent J. Firth, and
Robert W. Shimer,

Judge Robert B. Kugler

Defendants.
-----X

**DEFENDANT TECH TRADERS, INC.'S
ANSWER TO THE COMPLAINT**

Defendant Tech Traders, Inc. ("TTI"), by and through its attorneys, Gusrae Kaplan & Bruno, PLLC, as and for its Answer to the Complaint dated April 1, 2004 (the "Complaint") filed by the Plaintiff Commodity Futures Trading Commission ("CFTC") in the above referenced matter, states as follows:

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 (a), (b), (d), (e) and (f) of the Complaint, but denies the allegations contained in paragraph 1 (c) of the Complaint.

2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Complaint.

3. Denies the allegations contained in paragraph 3 of the Complaint.
4. Denies the allegations contained in paragraph 4 of the Complaint.
5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint.
6. Denies the allegations contained in paragraph 6 of the Complaint that pertain to TTI. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 that pertain to other Defendants.
7. Denies the allegations contained in paragraph 7 of the Complaint that pertain to TTI. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint that pertain to other Defendants.
8. Paragraph 8 of the Complaint contains a statement of Plaintiffs goals in this proceeding and do not properly call for an admission or denial. To the extent that this paragraph contains allegations of fact, TTI denies the allegations contained in paragraph 8 of the Complaint.
9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.
10. Denies the allegations contained in paragraph 10 of the Complaint that pertain to TTI. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint that pertain to other Defendants.
11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

14. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

15. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

16. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 16.

17. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

18. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of the Complaint.

19. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 19 of the Complaint.

20. Denies the allegations contained in paragraph 20 of the Complaint but admits that TTI has never been registered with the CFTC.

21. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of the Complaint.

22. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the second paragraph 21 of the Complaint.

23. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of the Complaint.

24. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of the Complaint.

25. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the Complaint.

26. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the Complaint.

27. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the Complaint.

28. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of the Complaint.

29. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of the Complaint.

30. Denies the allegations contained in paragraph 30 of the Complaint.

31. Denies the allegations contained in paragraph 31 of the Complaint.

32. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32 of the Complaint.

33. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of the Complaint.

34. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the Complaint.

35. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 35 (a), (b) and (c) of the Complaint.

36. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the Complaint.

37. Restates and reaffirms the answers set forth in paragraphs 1 through 36 herein.

38. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

39. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint.

40. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint.

41. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint.

42. Denies the allegations contained in paragraph 42 of the Complaint that pertain to TTI; denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 that pertain to other Defendants.

43. Restates and reaffirms the answers set forth in paragraphs 1 through 42 herein.

44. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint.

45. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the Complaint.

46. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Complaint, and the allegations contained in paragraph 46 call for a conclusion of law to which no response is required.

47. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of the Complaint.

48. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the Complaint.

49. Restates and reaffirms the answers set forth in paragraphs 1 through 48 herein.

50. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the Complaint.

51. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the Complaint.

52. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the Complaint.

53. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Complaint.

54. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the Complaint.

55. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the Complaint.

56. Restates and reaffirms the answers set forth in paragraphs 1 through 55 herein.

57. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the Complaint.

58. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the Complaint.

59. Restates and reaffirms the answers set forth in paragraphs 1 through 58 herein.

60. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 and respectfully refers the Court to the text of the Regulation 4.30 cited and relevant law defining the statute.

61. Denies the allegations contained in paragraph 61 of the Complaint.

62. Denies the allegations contained in paragraph 62 of the Complaint.

63. Denies the allegations contained in paragraph 63 of the Complaint.

64. Denies the allegations contained in paragraph 64 of the Complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

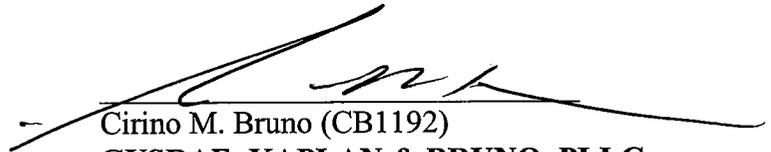
The Court lacks subject matter jurisdiction over the matters alleged against TTI in the Complaint.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

The Complaint fails to state a cause of action upon which relief may be granted.

WHEREFORE, Defendant TTI respectfully requests judgment: dismissing the Complaint; granting Defendant TTI costs and disbursement of this action; and granting such other and further relief the Court deems just and proper.

Dated: New York, New York
May 28, 2004



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CERTIFICATE OF SERVICE

I, Marni Rae Robin, Esq. hereby certify that on May 28, 2004, I caused copies of the foregoing **Tech Traders, Inc.'s Answer to the Complaint** to be served upon the following addressees by fax as indicated below:

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