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

**COMMODITY FUTURES TRADING)
COMMISSION,)**

Plaintiff,)

vs.)

**EQUITY FINANCIAL GROUP, LLC,)
TECH TRADERS, INC., TECH)
TRADERS, LTD., MAGNUM)
INVESTMENTS, LTD., MAGNUM)
CAPITAL INVESTMENTS, LTD.,)
VINCENT J. FIRTH, ROBERT W.)
SHIMER, COYT E. MURRAY, and J.)
VERNON ABERNETHY,)**

Defendants.)

Civil Action No.: 04CV 1512

Honorable Robert B. Kugler

**REPLY OF EQUITY RECEIVER TO RESPONSES OF JAMES ROBERTS,
DAVE WILLIAMS AND JANELLE A. WAGNER FAMILY TRUST TO
ORDER TO SHOW CAUSE DATED OCTOBER 6, 2005**

Stephen T. Bobo, (the "Receiver") Equity Receiver for defendants Equity Financial Group, LLC, Tech Traders, Inc., Tech Traders, Ltd., Magnum Investments, Ltd., Magnum Capital Investments, Ltd., Vincent J. Firth and Robert W. Shimer, submits this reply to clarify the points addressed in the respective responses submitted by James Roberts, Dave Williams and the Janelle A. Wagner Family Trust to this Court's October 6, 2005 Order to Show Cause.

A. The Responses of James Roberts and Dave Williams

The response of James Roberts is a continuation of the arguments he has already raised in support of his desire to receive a distribution directly as a Tier 1 investor even though he acknowledges that he invested through Dream Venture Group, LLC (“Dream Venture Group”), which was a Tier 1 investor. The Court has already rejected Mr. Roberts’ arguments in the September 26, 2005 order granting the Receiver’s interim distribution motion with modifications. (*See* Ct. Order at 2.) Mr. Roberts’ new contentions, including that the head of Dream Venture Group may have been a co-conspirator in the Tech Traders Ponzi scheme and that Coyt Murray may have a financial interest in Dream Venture Group, do not suggest a different result. Nor does Mr. Roberts suggest any reason why the Tier 1 claim of Dream Venture Group should be allowed despite its failure to respond to the objections of the CFTC and the Receiver to that claim. Mr. Robert’s response presents no basis why Dream Venture Group’s claim should be allowed even though it already received back more funds than it invested and it has failed to provide the required beneficial ownership information regarding its own Tier 2 investors.

Dave Williams’ response is similar. He apparently is another Tier 2 investor in Dream Venture Group who wants to be treated as a Tier 1 investor. He also offers no reason why Dream Venture Group’s claim should be allowed. He similarly suggests that his own investment should now be viewed as having been made directly to Tech Traders even though it was made to Dream Venture Group. This is essentially the same argument raised by James Roberts and others and already overruled by this Court.

If this position were adopted generally, the result would be that all ultimate investors would be treated identically, regardless of whether they were Tier 1 or Tier 4 with respect to

Tech Traders, and regardless of whether the respective entities with which they invested already received back all or none of their investments, and whether those entities had multiple other unrelated business or investment activities or none. Such a parity approach would present numerous problems to the detriment of investors as a whole. First, it would disregard the various intermediate levels of investing entities without any showing of traditional corporate-veil piercing criteria. It would greatly decrease the percentage distribution available to be paid out to each claim because it would ignore some or all of previous payments received by Tier 1 and Tier 2 entities that had not been distributed to each constituent member. Since the only Tier 1 investor under the control of this Court through the receivership is Shasta Capital Associates, LLC (“Shasta”), enlarging the Receiver’s role to sort out the financial affairs of other Tier 1 entities and the range of intermediate entities, would greatly complicate the distribution process, if it could be done at all. Even assuming no jurisdictional issues over domestic entities, some of the entities are offshore and have to date been reluctant to disclose their investor information. Making the distribution to the ultimate investors would substantially increase both the costs of administering the receivership estate and the time required to accomplish the distribution. To the extent that the entities engaged in other business activities, as Dream Venture Group apparently did, having to compute the net amounts owing to each of its investors would result in even further delay and expense to the receivership estate. Accordingly, the result advocated by Mr. Williams and Mr. Roberts is inequitable because it would permit them to receive enhanced treatment while being detrimental to most other similarly situated investors.

The Receiver considered these difficulties and costs in recommending that Shasta and all other Tier 1 investors be treated differently from their own respective investors. The Court has

adopted this recommendation. Mr. Williams and Mr. Roberts suggest no reason that changes the analysis.

Mr. Williams also suggests that certain of the Tech Traders payments to Dream Venture Group may have been for the purpose of investing in Dream Venture Group and its affiliates rather a distribution to Dream Venture Group's Tier 2 investors. The Receiver has no indication that this suggestion is accurate, but even if it were, it would not change the result in any case. Any transfer of funds from Tech Traders to Dream Venture Group that was not distributed to investors added to the value of that entity and to the value of its investors' interests.

If Dream Venture Group used those funds for some other business purpose other than making distributions to its own investors, that could give rise to an issue between Dream Venture Group and its investors. However, it would not be a basis for treating these Tier 2 investors with Dream Venture Group as if they had invested directly with Tech Traders.

B. The Response of the Janelle A. Wagner Family Trust

Despite its suggestion to the contrary, the Janelle A. Wagner Family Trust ("Family Trust") response fails to address either of the Receiver's objections to its claim. The Receiver first alerted Family Trust to his objections on March 31, 2005. Specifically, the Receiver objected to Family Trust's claim for failing to "provide names of persons with a beneficial interest in [Family Trust]," and for submitting inaccurate information in its claim form. (*See* Equity Receiver's Objections to Certain Investor Claims at ¶ 3, attached hereto as Exhibit A.) Thereafter, on April 13, 2005, the Receiver notified Family Trust about the procedures established by the Court for responding to the Receiver's objections.¹ Now, five months *after*

¹ This notice made clear that all responses to factual issues in the Receiver's objections, such as those involving Family Trust's claim, were to be filed by May 13, 2005. (*See* Notice with Respect to Equity Receiver's Objections to Certain Investor Claims at ¶ 4.)

the Court imposed deadline, Family Trust files a response to the Receiver's objections – and only after receiving the Court's Order to Show Cause. Despite ample time to prepare a thorough response to these objections, Family Trust's response fails to address either objection and, therefore, should be disregarded as unresponsive.

First, Family Trust has not disclosed the names of those persons with a beneficial interest in its investment with Tech Traders. Pursuant to the Court's August 23, 2004 Order, the Receiver requested that investors identify "all persons having a beneficial interest of any kind in their account with the Defendants."² (Ct. Order at ¶ 2.) As Family Trust's own documents demonstrate, it has not disclosed the identities of those with a beneficial interest in its investment with Tech Traders. (*See* Exhibits A and B to Family Trust's Response.)

Further, despite irrefutable evidence to the contrary, in its response Family Trust continued to maintain that only \$50,000 was withdrawn from its account with Tech Traders. But, yesterday, the Receiver's counsel received an email from counsel for Family Trust acknowledging \$75,000 in withdrawals. (*See* October 26, 2005 email correspondence from Peter Pearlman, attached hereto as Exhibit B.) In light of this admission, the Receiver requests that Family Trust submit an amended claim form that recognizes a total withdrawal amount of \$75,000.

Family Trust's inaccurate and wholly incomplete response makes no attempt to resolve these two issues. Accordingly, Family Trust's response should be disregarded as unresponsive or, on November 2, 2005, the Court should require Family Trust to respond on the merits of the


² The Court's Order also required that investors "complete and return the claim form to the Receiver within thirty (30) days from the date of mailing out the claim forms." (Ct. Order at ¶ 3.) The Receiver mailed the claim forms to investors on August 27, 2004. Therefore, to participate in the claim process, investors were required to submit their completed claim forms by September 26, 2004. Nevertheless, Family Trust did not submit its claim form to the Receiver until March of 2005. (*See* Family Trust's Response at ¶ 1.)

Receiver's objections and to show cause as to why an order disallowing its claim should not be entered at that time without further delay or expense to the receivership estate.³

Dated: October 27, 2005

Respectfully submitted,
STEPHEN T. BOBO
Equity Receiver

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³ We understand that the CFTC has its own objections that may affect Family Trust's entitlement to a distribution even if the Receiver's objections are cured.

Exhibit A

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**EQUITY FINANCIAL GROUP, LLC,)
TECH TRADERS, INC., TECH)
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CAPITAL INVESTMENTS, LTD.,)
VINCENT J. FIRTH, ROBERT W.)
SHIMER, COYT E. MURRAY, and J.)
VERNON ABERNETHY)
)
Defendants.)**

Honorable Robert B. Kugler

EQUITY RECEIVER’S OBJECTIONS TO CERTAIN INVESTOR CLAIMS

Stephen T. Bobo (the “Receiver”), the Equity Receiver of Defendants Equity Financial Group, LLC, Tech Traders, Inc., Tech Traders, Ltd., Magnum Investments, Ltd., Magnum Capital Investments, Ltd., Vincent J. Firth, and Robert W. Shimer, submits these objections to 31 of the 105 proofs of claim submitted by investors.¹

¹ The revised claim schedules are attached hereto as Exhibits A and B.

A. Claims in Which Claimants Did Not Invest With the Defendants

1. The Receiver objects to the following claims because the claimants acknowledge that they did not invest funds directly or indirectly with Tech Traders:

- Simpson Clark;
- Wayne Gideons; and
- Shadetree Investment Trust.

B. Incomplete or Inaccurate Proofs of Claim and Claimants Who Recovered in Full

2. The Receiver objects to the following claims because either the claim form and/or the supporting documentation submitted is incomplete and/or inaccurate or the claimant has already recovered the entire amount invested (and, in some cases, even appears to have received back more than invested):

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Reason for Objection	Information (per Receiver's accountants)	Receiver's Proposed Treatment of Claim
1	A Wall Street Fund c/o Thomas Buckley	\$450,000.00	\$0.00	Incomplete (failure to provide names of persons with beneficial interest in claimant)	Same as claim form	Disallow until claimant provides the required documentation
4	Ardill, Thomas A.	\$100,000.00	\$52,000.00	Inaccurate; Incomplete (failure to provide documentation supporting withdrawals)	Funds invested: \$99,980.00 Previous withdrawals: \$71,133.00	Disallow until claimant provides the required documentation; then, allow per accurate information (per Receiver's accountants)
5	Bally Lines Ltd. c/o Dr. Edward J. Evors	\$1,508,000.00	\$410,000.00	Inaccurate; Incomplete (failure to provide names of persons with beneficial interest in claimant)	Funds invested: \$1,458,000.00	Disallow until claimant provides the required documentation; then, allow per accurate information (per Receiver's accountants)

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Reason for Objection	Information (per Receiver's accountants)	Receiver's Proposed Treatment of Claim
16	Citco Global Custody N.V. (Stable Absolute Return)	\$250,000.00	\$0.00	Incomplete (failure to provide amended claim form with the names of persons with beneficial interest in claimant)	Same as claim form	Disallow until claimant provides the required documentation
22	Dream Venture Group, LLC c/o Gregg Amerman	\$1,083,000.00	\$280,146.00	Claimant recovered more than amount invested; Inaccurate; Incomplete (failure to provide documentation supporting investments and withdrawals)	Previous withdrawals: \$1,278,495.00	No allowable claim (claimant recovered more than amount invested)
25	Gambrell, Byron	\$60,000.00	\$0.00	Incomplete (failure to provide documentation supporting investments)	Same as claim form	Disallow until claimant provides the required documentation
30	ICC Finance Corp. c/o Shlomo Bitensky	\$400,000.00	\$411,115.00	Claimant recovered more than amount invested; Inaccurate	Funds invested: \$300,000.00	No allowable claim (claimant recovered more than amount invested)
31	International Investment Alliance c/o Henry W. Baletin (through New Century Trading, LLC)	\$175,000.00	\$115,000.00	Inaccurate	Funds invested: \$173,158.00 Previous withdrawals: \$115,000.00	Allow per accurate information (per Receiver's accountants) and as aggregated with Metalchem Metallurgical Inc., the other New Century claimant
32	Janelle Wagner Trust c/o Snyder Financial Services	\$239,000.00	\$50,000.00	Inaccurate; Incomplete (failure to provide names of persons with beneficial interest in claimant)	Funds invested: \$239,000.00 Previous withdrawals: \$75,000.00	Disallow until claimant provides the required documentation; then, allow per accurate information (per Receiver's accountants)
38	Lopez, Alfred	\$25,000.00	\$0.00	Incomplete (failure to provide names of persons with beneficial interest in claimant)	Same as claim form	Disallow until claimant provides the required documentation

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Reason for Objection	Information (per Receiver's accountants)	Receiver's Proposed Treatment of Claim
43	Metalchem Metallurgical Inc. c/o Fernando Garcia (through New Century Trading, LLC)	\$100,000.00	\$130,576.00	Claimant recovered more than amount invested; Inaccurate	Funds invested: \$99,985.00	No allowable claim (claimant recovered more than amount invested); aggregated with International Investment Alliance, the other New Century claimant
85	Universe Capital Appreciation, LLC	\$3,079,500.00	\$432,335.00	Incomplete (failure to provide the names of persons with beneficial interest in claimant)		Disallow until claimant provides the required documentation

C. Claimants Whose Claims Must Be Aggregated for Distribution Purposes

3. The Receiver objects to the claims submitted by the Sterling entities until all the deficiencies in their claim forms are cured because, for the reasons detailed in Reply of Stephen T. Bobo, Equity Receiver, to Objections to Motion for Authority to Make Interim Distribution, all the Sterling entities' claims show unexplained inter-entity transfers and therefore must be aggregated for distribution purposes.² Following are the specific deficiencies in the claim forms.

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Reason for Objection	Receiver's Proposed Treatment of Claim
70	Sterling ACS Ltd., Sub account - Strategic (Bahamas) Portfolio	\$1,480,000.00	\$724,370.40	Inaccurate; Incomplete (failure to amend claim form and provide documentation supporting investments and identities of ultimate beneficial owners)	Disallow until all deficiencies in all Sterling claim forms are cured; then, allow only on an aggregated basis

² A principal reason for the Receiver's proposed aggregation is that the Sterling entities' accounts with Tech Traders show a number of transfers among them. Not all these transfers are adequately documented, and the Sterling entities have failed to disclose the identities of the ultimate beneficial owners of the invested funds or to provide any evidence that the ultimate beneficial owners authorized these inter-entity transfers. In one case, Tech Traders' books show a transfer from an account of one of the Sterling entities to an account of another Sterling entity without any actual funds supporting such transfers. The Sterling entities themselves treated the accounts as a unified group before the receivership and the Receiver therefore proposes that any distribution be made to them as a unified group and only after all deficiencies in all the claim forms submitted by the Sterling entities are cured.

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Reason for Objection	Receiver's Proposed Treatment of Claim
71	Sterling Alliance Ltd.	\$250,000.00	\$175,000.00	Incomplete (failure to provide documentation supporting investments)	Disallow until all deficiencies in all Sterling claim forms are cured; then, allow only on aggregated basis
74	Sterling Investment Management, Ltd.	\$4,567,845.00	\$240,000.00	Incomplete (failure to provide documentation supporting investments and identities of ultimate beneficial owners)	Disallow until all deficiencies in all Sterling claim forms are cured; then, allow only on aggregated basis
75	Sterling Trust (Anguilla), Ltd. (excludes transactions in Man Financial, account no. 37923)	\$0	\$100,000.00	Claimant recovered more than invested; Inaccurate; Incomplete (failure to account for all withdrawals, provide documentation supporting withdrawals and identities of ultimate beneficial owners)	No allowable claim (claimant did not invest any funds)
76	Strategic Investment Portfolio	\$278,678.00	\$0.00	Incomplete (failure to provide documentation supporting investments)	Disallow until all deficiencies in all Sterling claim forms are cured; then, allow only on aggregated basis

D. Claimants Who Received Payments As a Result of Previous Investments With Kaivalya Holding Group, Inc. or Edgar Holding Group, Inc.

4. The Receiver objects to the allowance of the following claims unless each claimant's receipt of Tech Traders' funds as repayment of earlier investments with Kaivalya Holding Group, Inc. and Edgar Holding Group, Inc. is taken into account and is treated as a previous withdrawal. Therefore, consistent with the Receiver's proposed method of distribution, these claimants would retain the previous withdrawals they received, but the withdrawals would be credited against the claimants' respective pro rata shares calculated based on total funds invested. The following formula illustrates how each claim would be treated: (actual dollars invested x pro rata multiplier) - withdrawals previously received = distribution amount. For example, in the case of Nancy Omaha Boy, the formula would be applied as follows:

\$195,000.00 invested x 38 percent pro rata distribution – \$180,000.00 withdrawn = -

\$105,900.00. Therefore, Omaha Boy has already received a 92 percent return on her initial investment (the 38 percent pro rata distribution would allow Omaha Boy to receive a \$74,100.00 distribution, but Omaha Boy already received \$180,000.00, or a 92 percent return). Unless the Receiver is in a position to distribute to investors more than 92 percent of their initial investments, Omaha Boy would not recover additional funds from the receivership estate. The following claimants received repayments from Kaivalya Holding Group, Inc. and/or Edgar Holding Group, Inc.:

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Repayment for Investment In	Approximate Repayment Received Traceable to Tech Traders ³	Receiver's Proposed Treatment of Claim
26	*Green, Marsha	\$152,000.00	\$0.00	Kaivalya Holding Group, Inc.	\$111,000.00	Allow after subtracting repayment received traceable to Tech Traders
37	List, Thomas c/o Millennium Trust Company	\$95,000.00	\$0.00	Kaivalya Holding Group, Inc.	\$47,500.00	Allow after subtracting repayment received traceable to Tech Traders
40	Marrongelle, Dr. Jeffrey and Barbara	\$100,000.00	\$0.00	Edgar Holding Group, Inc.	\$42,000.00	Allow after subtracting repayment received traceable to Tech Traders
46	Omaha Boy, Nancy H.	\$195,000.00	\$0.00	Kaivalya Holding Group, Inc.	\$180,000.00	Allow after subtracting repayment received traceable to Tech Traders
65	Shasta, Peter Mt.	\$200,100.00	\$200,000.00	Edgar Holding Group, Inc.	\$100,000.00	No allowable claim (claimant recovered more than amount invested)

³ These figures are based solely on currently available bank records and are subject to revision as more information becomes available.

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Repayment for Investment In	Approximate Repayment Received Traceable to Tech Traders	Receiver's Proposed Treatment of Claim
67	** Shimer, Alison	\$150,000.00	\$0.00	Kaivalya Holding Group, Inc.	Alison Shimer's husband, Defendant Robert Shimer, received \$212,945.00 via joint checking account (number 5300125498) shared with Alison Shimer and an additional \$24,150.00 via an attorney escrow account; further, Robert Shimer received \$196,550.00 via their joint checking account from Edgar	No allowable claim (claimant recovered more than amount invested)

* The \$152,000.00 invested by Marsha Green includes the \$47,000.00 wire transfer to Shasta Capital Associates, LLC on April 2, 2004

** Alison Shimer transferred these funds totaling \$150,000.00 to Shasta from a joint checking account (number 5300125498) held in the names of Robert and Alison Shimer at Patriot Bank; therefore, her claim should be aggregated with all the repayments transferred to this account in the name of Robert Shimer

E. Claimants Being Investigated by the CFTC

5. The following claimants should be placed on the Disputed Claims list at this time because the CFTC has informed the Receiver that they are subjects of the CFTC's ongoing investigation:

- Quest for Life, Claim Number 55
- All the Sterling entities, Claim Numbers 70 through 76

F. Conflicting Proofs of Claim for the Same Money

6. The following claimants submitted conflicting proofs of claim to the Receiver asserting entitlement to the same funds invested with Shasta under the name of Dale Putz. Specifically, Dale Putz submitted a proof of claim asserting that \$300,000.00 was invested with Shasta on his behalf (\$50,000.00 from a personal account and \$250,000.00 from Chicago Freight Car Leasing F/B/O Dale Putz). Chicago Freight Car Leasing submitted a proof of claim

asserting its right to \$250,000.00 of the \$300,000.00 invested by Dale Putz. The Court will need to resolve each claimant's right to the funds.

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Information (per Receiver's accountants)
54	Dale Putz	\$300,000.00	\$0.00	Same as claim form
91	Chicago Freight Car Leasing	\$250,000.00	\$0.00	

WHEREFORE, the Receiver respectfully requests that the Court enter an order:

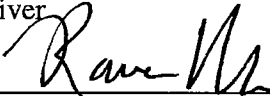
- a. adopting the Receiver's proposed treatment of claims for those claims discussed in Sections A, B, C, D and E; and
- b. resolving the conflicting claims identified in Section F.

DATED: March 31, 2005

Respectfully submitted,

STEPHEN T. BOBO
Equity Receiver

By: _____


One of his attorneys

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Exhibit A

Agreed Claims Interim Distribution Schedule

CFTC v. Equity Financial Group, LLC

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount
2	Aaron, Susan D. c/o Vanguard Fiduciary Trust Company	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00
3	Acacia Fund	\$115,000.00	\$0.00	\$115,000.00	\$43,700.00	\$43,700.00
6	Batchelar, Robert Scott	\$150,000.00	\$0.00	\$150,000.00	\$57,000.00	\$57,000.00
7	BPU Banca Popolare Commercio, Industria International SA c/o Massimo Munzin	\$519,914.60	\$0.00	\$519,914.60	\$197,567.54	\$197,567.54
8	Broadtree Reinsurance Co. c/o John Evans	\$200,000.00	\$0.00	\$200,000.00	\$76,000.00	\$76,000.00
9	Bubonovich, Michael and Carol	\$150,000.00	\$0.00	\$150,000.00	\$57,000.00	\$57,000.00
10	Bubonovich, Michael c/o First Regional Bank	\$222,789.00	\$0.00	\$222,789.00	\$84,659.82	\$84,659.82
11	Castle Rock Company Limited c/o Nesrin Gunkut	\$499,968.00	\$0.00	\$499,968.00	\$189,987.84	\$189,987.84

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Agreed Claims Interim Distribution Schedule

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
12	Chambers, James F. and Iva N.	\$100,000.00	\$100,000.00	\$0.00	\$38,000.00		
13	Chambers, James F. and Iva N./ Triple C Corp.	\$675,000.00	\$0.00	\$675,000.00	\$256,500.00		
	TOTAL:	\$775,000.00	\$100,000.00	\$675,000.00	\$294,500.00	\$194,500.00	38.00%
14	Chen, Jun	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
15	Chung, Anita Li	\$150,000.00	\$0.00	\$150,000.00	\$57,000.00	\$57,000.00	38.00%
17	Corcoran, Steve	\$200,000.00	\$0.00	\$200,000.00	\$76,000.00	\$76,000.00	38.00%
18	Dent, Thomas c/o Vanguard Fiduciary Trust Company	\$225,000.00	\$0.00	\$225,000.00	\$85,500.00		
19	Dent, Thomas W. and Barbara L.	\$150,000.00	\$0.00	\$150,000.00	\$57,000.00		
	TOTAL:	\$375,000.00	\$0.00	\$375,000.00	\$142,500.00	\$142,500.00	38.00%

Agreed Claims Interim Distribution Schedule

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
20	Deverett, Howard/Elexis Capital	\$300,000.00	\$0.00	\$300,000.00			
21	Deverett, Howard	\$100,000.00	\$0.00	\$100,000.00			
	TOTAL:	\$400,000.00	\$0.00	\$400,000.00	\$152,000.00	\$152,000.00	38.00%
23	Freda, Richard R. and Marcia c/o Charles Schwab & Co.	\$75,000.00	\$0.00	\$75,000.00	\$28,500.00	\$28,500.00	38.00%
24	Future Dreams, LLC c/o Ferrell, Mary A. and Scot	\$410,000.00	\$95,000.00	\$315,000.00	\$155,800.00	\$60,800.00	38.00%
27	Harper Jr., M.D., Fitz	\$125,000.00	\$156,487.00	-\$31,487.00	\$47,500.00	\$0.00	125.19%
90	Hirn, Ron c/o Ryan Allan Ltd.	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
28	Heller, William D. and Janet E.	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
29	Hirsch, Norman	\$205,000.00	\$0.00	\$205,000.00	\$77,900.00	\$77,900.00	38.00%

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Agreed Claims Interim Distribution Schedule

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
33	Kalb, Austin	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
34	KCL Corporation c/o Faith and Cengiz Ozcelebi	\$200,482.00	\$0.00	\$200,482.00	\$76,183.16	\$76,183.16	38.00%
35	Kraus, Stephen J. c/o Lincoln Trust Company	\$136,000.00	\$0.00	\$136,000.00	\$51,680.00	\$51,680.00	38.00%
36	Leveque, Laurent	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
39	Loucks, Richard	\$95,000.00	\$60,000.00	\$35,000.00	\$36,100.00	\$0.00	63.16%
41	McManigal, Paul G.	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00		
42	McManigal, Paul G. IRA c/o Millennium Trust Company	\$366,000.00	\$366,000.00	\$0.00	\$139,080.00		
	TOTAL:	\$466,000.00	\$366,000.00	\$100,000.00	\$177,080.00	\$0.00	78.54%
44	Mukerji, Jaydip	\$200,000.00	\$0.00	\$200,000.00	\$76,000.00	\$76,000.00	38.00%

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Agreed Claims Interim Distribution Schedule

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
45	Northridge, G. Stephen	\$350,000.00	\$0.00	\$350,000.00	\$133,000.00	\$133,000.00	38.00%
47	P & G Associates, LLC (Account No. 5100-3)	\$1,510,000.00	\$0.00	\$1,510,000.00	\$573,800.00		
48	P & P Associates, LLC (Account No. 1100 LDP)	\$250,000.00	\$0.00	\$250,000.00	\$95,000.00		
49	P & P Associates, LLC (Account No. 1100 WAP)	\$350,000.00	\$0.00	\$350,000.00	\$133,000.00		
50	Patton Associates, LLC (Account No. 1098)	\$1,000,000.00	\$1,143,333.00	-\$143,333.00	\$380,000.00		
51	Patton Associates, LLC (Account No. 1098-1)	\$900,000.00	\$0.00	\$900,000.00	\$342,000.00		
52	Patton Associates, LLC (Account No. 1098-sub)	\$200,000.00	\$2,000,000.00	-\$1,800,000.00	\$76,000.00		
	TOTAL:	\$4,210,000.00	\$3,143,333.00	\$1,066,667.00	\$1,599,800.00	\$0.00	74.66%
53	Podila, Prasad	\$400,000.00	\$0.00	\$400,000.00	\$152,000.00	\$152,000.00	38.00%

Agreed Claims Interim Distribution Schedule

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
56	Richardson, Robert c/o Charles Schwab & Co.	\$48,000.00	\$0.00	\$48,000.00	\$18,240.00	\$18,240.00	38.00%
57	Richardson, Theresa c/o Charles Schwab & Co.	\$28,000.00	\$0.00	\$28,000.00	\$10,640.00	\$10,640.00	38.00%
58	Rola, LLC c/o Robert P. Goldstein	\$500,000.00	\$0.00	\$500,000.00	\$190,000.00	\$190,000.00	38.00%
59	Saner, Cheri	\$110,000.00	\$0.00	\$110,000.00	\$41,800.00	\$41,800.00	38.00%
60	Saner, Dale c/o First Regional Bank	\$360,000.00	\$0.00	\$360,000.00	\$136,800.00	\$136,800.00	38.00%
61	Schulz, Diana c/o Millenium Trust Co.	\$22,794.15	\$0.00	\$22,794.15	\$8,661.77		
62	Schulz, William C. and Diana	\$244,000.00	\$105,000.00	\$139,000.00	\$92,720.00		
63	Schulz, William C. c/o Millenium Trust Co.	\$42,066.20	\$0.00	\$42,066.20	\$15,985.16		
	TOTAL:	\$308,860.35	\$105,000.00	\$203,860.35	\$117,366.93	\$12,366.93	38.00%

Agreed Claims Interim Distribution Schedule

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
64	Seward, Charles	\$60,000.00	\$0.00	\$60,000.00	\$22,800.00	\$22,800.00	38.00%
66	Shasta, Peter Mt./ G.W. Bond Management, LLC	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
68	Shimer, Stephen D.	\$175,000.00	\$0.00	\$175,000.00	\$66,500.00		
69	Shimer, Stephen D./SDS Defined Benefit Plan	\$50,000.00	\$0.00	\$50,000.00	\$19,000.00		
	TOTAL:	\$225,000.00	\$0.00	\$225,000.00	\$85,500.00	\$85,500.00	38.00%
77	Stevenson, Nicholas c/o Millennium Trust Company	\$285,939.16	\$0.00	\$285,939.16	\$108,656.88		
78	Stevenson, Nicholas	\$250,000.00	\$0.00	\$250,000.00	\$95,000.00		
	TOTAL:	\$535,939.16	\$0.00	\$535,939.16	\$203,656.88	\$203,656.88	38.00%
79	Taleb, Nazih and May c/o Karim Taleb	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
80	Tate Family Limited Partnership	\$430,000.00	\$0.00	\$430,000.00	\$163,400.00	\$163,400.00	38.00%

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Agreed Claims Interim Distribution Schedule

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
81	Tate, Philip	\$300,000.00	\$0.00	\$300,000.00	\$114,000.00	\$114,000.00	38.00%
82	Triester International Trading Corporation	\$200,000.00	\$0.00	\$200,000.00	\$76,000.00	\$76,000.00	38.00%
83	Unger, Kathrin	\$238,000.00	\$66,660.00	\$171,340.00	\$90,440.00	\$23,780.00	38.00%
84	Unger, Samuel S.	\$125,000.00	\$0.00	\$125,000.00	\$47,500.00	\$47,500.00	38.00%
86	Valbracht, Walter William and Janice	\$220,000.00	\$50,000.00	\$170,000.00	\$83,600.00	\$33,600.00	38.00%
87	Wood, Dennis c/o Charles Schwab & Co.	\$53,000.00	\$0.00	\$53,000.00	\$20,140.00	\$20,140.00	38.00%
88	Zinman, Don	\$250,000.00	\$0.00	\$250,000.00	\$95,000.00	\$95,000.00	38.00%
89	Zwyssig, Marco	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
				TOTAL:		\$3,621,202.17	

Exhibit B

Disputed Claims Interim Distribution Schedule

CFTC v. Equity Financial Group, LLC

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount
1	A Wall Street Fund c/o Thomas Buckley	\$450,000.00	\$0.00	\$450,000.00	\$171,000.00	\$171,000.00
4	Ardill, Thomas A.	\$100,000.00	\$52,000.00	\$48,000.00	\$38,000.00	\$38,000.00
5	Bally Lines Ltd. c/o Dr. Edward J. Evors	\$1,508,000.00	\$410,000.00	\$1,098,000.00	\$573,040.00	\$166,320.00
91	Chicago Freight Car Leasing	\$250,000.00	\$0.00	\$250,000.00	\$95,000.00	\$95,000.00
16	Citco Global Custody N.V. (Stable Absolute Return)	\$250,000.00	\$0.00	\$250,000.00	\$95,000.00	\$95,000.00
22	Dream Venture Group, LLC c/o Gregg Amerman	\$1,083,000.00	\$280,146.00	\$802,854.00	\$411,540.00	\$131,540.00
25	Gambrell, Byron	\$60,000.00	\$0.00	\$60,000.00	\$22,800.00	\$22,800.00
26	Green, Marsha	\$105,000.00	\$0.00	\$105,000.00	\$39,900.00	\$39,900.00

Disputed Claims Interim Distribution Schedule

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
30	ICC Finance Corp. c/o Shlomo Bitensky	\$400,000.00	\$411,115.00	-\$11,115.00	\$152,000.00	\$0.00	102.78%
31	International Investment Alliance c/o Henry W. Baletin	\$175,000.00	\$115,000.00	\$60,000.00	\$66,500.00	\$0.00	65.71%
32	Janelle Wagner Trust c/o Snyder Financial Services	\$239,000.00	\$50,000.00	\$189,000.00	\$90,820.00	\$40,820.00	38.00%
37	List, Thomas c/o Millennium Trust Company	\$95,000.00	\$0.00	\$95,000.00	\$36,100.00	\$36,100.00	38.00%
38	Lopez, Alfred	\$25,000.00	\$0.00	\$25,000.00	\$9,500.00	\$9,500.00	38.00%
40	Marrongelle, Dr. Jeffrey L. and Barbara	\$100,000.00	\$0.00	\$100,000.00	\$38,000.00	\$38,000.00	38.00%
43	Metalchem Metallurgical Inc. c/o Fernando Garcia	\$100,000.00	\$130,576.00	-\$30,576.00	\$38,000.00	\$0.00	130.58%
46	Omaha Boy, Nancy H.	\$195,000.00	\$0.00	\$195,000.00	\$74,100.00	\$74,100.00	38.00%

Disputed Claims Interim Distribution Schedule

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
54	Putz, Dale F.	\$300,000.00	\$0.00	\$300,000.00	\$114,000.00	\$114,000.00	38.00%
55	Quest for Life c/o Samuel J. Grimes	\$2,850,000.00	\$870,000.00	\$1,980,000.00	\$1,083,000.00	\$213,000.00	38.00%
65	Shasta, Peter Mt.	\$200,100.00	\$200,000.00	\$100.00	\$76,038.00	\$0.00	99.95%
67	Shimer, Alison E.	\$150,000.00	\$0.00	\$150,000.00	\$57,000.00	\$57,000.00	38.00%

Disputed Claims Interim Distribution Schedule

CFTC v. Equity Financial Group, LLC et al., Case No. 04CV 1512

Claim Number	Name of Claimant	Funds Invested (per claim form)	Previous Withdrawals (per claim form)	Net Cash Balance	Gross Distribution Amount	Net Distribution Amount	% Total Cumulative Distribution Received
70	Sterling ACS Ltd., Subaccount - Strategic (Bahamas) Portfolio	\$1,480,000.00	\$724,370.40	\$755,629.60	\$562,400.00		
71	Sterling Alliance Ltd.	\$250,000.00	\$175,000.00	\$75,000.00	\$95,000.00		
72	Sterling Bank Ltd.	\$9,177,500.00	\$0.00	\$9,177,500.00	\$3,487,450.00		
73	Sterling Casualty & Insurance Ltd.	\$190,000.00	\$0.00	\$190,000.00	\$72,200.00		
74	Sterling Investment Management, Ltd.	\$4,567,845.00	\$240,000.00	\$4,327,845.00	\$1,735,781.10		
75	Sterling Trust (Anguilla), Ltd.	\$0.00	\$100,000.00	-\$100,000.00	\$0.00		
76	Strategic Investment Portfolio	\$278,678.00	\$0.00	\$278,678.00	\$105,897.64		
	TOTAL:	\$15,944,023.00	\$1,239,370.40	\$14,704,652.60	\$6,058,728.74	\$4,819,358.74	38.00%
85	Universe Capital Appreciation, LLC c/o David Perkins	\$3,079,500.00	\$432,335.00	\$2,647,165.00	\$1,170,210.00	\$737,875.00	38.00%
	TOTAL:					\$6,857,887.74	

CERTIFICATE OF SERVICE

I, Raven Moore, on oath hereby certify that I caused copies of the **EQUITY**

RECEIVER'S OBJECTIONS TO CERTAIN INVESTOR CLAIMS to be served upon:

Elizabeth M. Streit, Lead Trial Attorney	Paul Blaine
Scott R. Williamson, Deputy Regional Counsel	Assistant United States Attorney
Rosemary Hollinger, Regional Counsel	for the District of New Jersey
Commodity Futures Trading Commission	Camden Federal Building & U.S. Courthouse
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Chicago, Illinois 60661	Camden, New Jersey 08101

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Alison Shimer	ICC Finance Corporation
1225 W. Leesport Rd.	Attn: Shlomo Bitensky
Leesport, PA 19533	41 Hasbalom Street
	Raanana, Israel 43561

Dr. Jeffrey Marrongelle	Thomas G. Buckley, Jr.
Barbara Marrongelle	A Wall Street Fund
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Orwigsburg, PA 17961	San Diego, CA 92124

Paul M. Crimmins	Samuel J. Grimes, Jr.
	Quest for Life

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Citco Bank Nederland N.V.
Citco Global Custody NV - Ref 209862
Dublin Branch Custom House
Plaza Block 6 International Financial Services
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Dublin, Ireland

Dream Venture Group, LLC
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410 Autry Ridge Point
Alpharetta, GA 30022

Byron Gambrell
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West Point, TN 38486

Henry W. Balentin
International Investment Alliance
Rooi Bosal 41-B
Santa Cruz, Aruba
West Indies

Janelle Wagner Trust
c/o Snyder Financial Services
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Alfred Lopez
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Albuquerque, NM 87111

Sterling ACS Ltd.
Subaccount - Strategic (Bahamas) Portfolio
c/o Dicienzo Storr
British American House
Marlborough Street & New Lyan
Nassau Bahamas

Universe Capital Appreciation, LLC
Perkins, David
90 S. 1250 W
St. George, UT 84770

Sterling Investment Management, Ltd.
Subaccount Sterling Investment Management Ltd.
c/o Ms. Domatee Mohan
British American House
Marlborough Street & New Lyan
Nassau Bahamas

Sterling Trust (Anguilla) Ltd.
National Bank
c/o Ms. Domatee Mohan
British American House
Marlborough Street & New Lyan
Nassau Bahamas

Metalchem
Metallurgical Inc.
c/o MM1/Fernando Garcia
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Spring, Texas 77387

Strategic Investment Portfolio
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G.W. Bond Management, LLC,
c/o Peter Mt. Shasta
P.O. Box 1103
Mount Shasta, CA 96067

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22429 Brookside Way
Barrington, IL 60010

Marsha L. Green
175 Hawthorne Court
Wyomissing, PA 19610

Nancy Boy Omaha
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Reading, PA 19606

Sterling Alliance Ltd.
c/o Dicienzo Storr
British American House
Malborough Street & Navy Lyan
Nassau Bahamas

Simpson Clark
Dream Ventures Group, LLC
1955 Lochlomand Trail SW
Atlanta, GA 30331

Wayne Gideons
Bally Lines Ltd.
2953 Forest Circle
Seffner, FL 33584

Shadetree Investment Trust
c/o Eldridge Glasford
Spencer Howell Building #208
Charlestown, Nevis, West Indies

Thomas E. List
920 Imperial Drive
Mohnton, PA 19540

via U.S. Mail on this 31st day of March, 2005.



Raven Moore
Counsel for the Equity Receiver

Exhibit B

Moore, Raven

From: Peter Pearlman [PSP@NJLAWFIRM.COM]
Sent: Wednesday, October 26, 2005 1:05 PM
To: Moore, Raven
Cc: 'Jeff Saunders'
Subject: Commodity Futures Trading Commission v. Equity Financial Group, etc. et als. D.N.J. Case No. 04-1512

Raven Moore, Esq
Sachnoff & Weaver, Ltd
10 South Wacker Drive
Chicago, IL 60606-7507

Dear Ms. Moore:

I am one of the attorneys representing the Janelle Wagner Trust in the above captioned matter. In connection with the Receiver's objection to the Trust's claim and the related Order to Show Cause returnable on November 2, 2005, I enclose a copy of a letter from Lance W. Woderlin, Esq. dated October 25, 2005, the original of which was sent to Elizabeth Streit, Esq. of the CFTC. As is apparent from the letter, the Trust acknowledges that a \$75000 credit is warranted.

I am sending this letter to you at the suggestion of Steven T. Bobo, Esq. Please forgive the informality of this transmission, but in light of the time restrictions here, I wanted you to have it as soon as possible.

Very truly yours,

Peter S. Pearlman
Cohn Lifland Pearlman Herrmann & Knopf LLP
Park Eighty West Plaza-One
Saddle Brook, NJ 07663
201-845-9600
201-845-9423 fax
psp@njlawfirm.com

CERTIFICATE OF SERVICE

I, Raven Moore, on oath hereby certify that I caused copies of the **Reply of Equity Receiver to Responses of James Roberts, Dave Williams and Janelle A. Wagner Family Trust to Order to Show Cause Dated October 6, 2005** to be served upon:

Elizabeth M. Streit, Lead Trial Attorney
Scott R. Williamson, Deputy Regional Counsel
Rosemary Hollinger, Regional Counsel
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Saddle Brook, NJ 07663

Adinamis, Michael & Saunders
Jeffrey A. Saunders
Counsel for Janelle A. Wagner Family Trust
500 East 96th Street, Suite 360
Indianapolis, IN 46240

via U.S. Mail on this 27th day of October, 2005.



Counsel for the Equity Receiver