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

“DOCUMENT FILED ELECTRONICALLY”

COMMODITY FUTURES TRADING)
COMMISSION,)

Plaintiff,)

vs.)

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

Defendants.)

Civil Action No.: 04-cv-1512

**RESPONSE TO OBJECTION OF
RECEIVER AND THE COMMODITY
FUTURES TRADING COMMISSION
TO THE CLAIM OF THE JANELLE A.
WAGNER FAMILY TRUST**

Janelle A. Wagner, as Trustee of the Janelle A. Wagner Family Trust, by counsel Cohn Lifland Pearlman Herrmann & Knopf LLP, responds to the Objections of the Receiver and the Commodity Futures Trading Commission as follows:

1. In March, 2005, Claim Forms were filed on behalf of the Janelle A. Wagner Family Trust by Janelle A. Wagner, and by Brian Snyder of Snyder Financial Services, which had facilitated the Trust's investment of funds with Tech Traders, Inc. Attached to the Claim Forms were records documenting the Trust's interest with Tech Traders, Inc. These records demonstrate that the amount of the account balance shown for the Trust's interest in Tech Traders was \$457,124.00. The total amount invested by the Trust was \$239,000, while the amount withdrawn was \$50,000. A copy of the Claim Form together with the Tech Traders, Ltd's then most recent account statement are annexed hereto jointly as Exhibit "A."

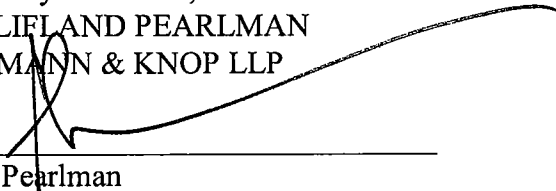
2. In addition to the filing of these Claim Forms, representatives of Ms. Wagner and Mr. Snyder have provided additional records and information to the Receiver and the Commodity Futures Trading Commission. Included within that information was an Affidavit of Janelle A. Wagner, dated March 22, 2005, a copy of which is annexed here as Exhibit "B." This information resolved all issues raised in the Objections, including those involving any suspected additional withdrawals, and involving Ms. Wagner's receipt of funds from Karum Corporation.

3. Ms. Wagner, on behalf of the Janelle A. Wagner Family Trust submits that the objections filed by the Receiver and the Commodity Futures Trading Commission are without merit, and that the claim should be allowed.

4. This Response is filed in compliance with this Court's Order to Show Cause dated October 6, 2005, and serves as notice of Ms. Wagner's intention to appear and show cause at the hearing set for November 2, 2005, at 2:00 p.m.

Respectfully submitted,
COHN LIFLAND PEARLMAN
HERRMANN & KNOP LLP

By:


Peter S. Pearlman
A Member of the Firm

Dated: October 19, 2005

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW JERSEY

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

vs.

Civil Action No.: 04CV 1512

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

Honorable Robert B. Kugler

Defendants.

CLAIM FORM FOR INVESTORS
WITH TECH TRADERS

Please complete the following statements, make any changes necessary to ensure accuracy, sign and return it to the address shown on the bottom of this form.

1. I invested funds for commodity trading with Tech Traders, Ltd. or Tech Traders, Inc. ("Tech Traders").

My investment with Tech Traders is recorded under the following account name and account number, if available: Snyder Financial Services, BK5-492.

3. I originally learned about Tech Traders from Brian Snyder and was solicited to invest in Tech Traders by Mr. Coyt Murray.

4. According to the most recent information provided to me as of January 31, 2004 (date), I understand that the amount of the account balance shown for my interest in Tech Traders is \$457,124.00.

5 I received information regarding the amount of my equity with Tech Traders from Quarterly statements sent to Snyder Financial Services.

6. On the dates listed, the following amounts were transferred to fund my investment with Tech Traders:

<u>Date</u>	<u>Amount</u>	<u>Source of Funds Used to Invest</u>	<u>Person Making Transfer</u>	<u>Recipient of Transfer</u>
4/09/02	\$45,000	Trust funds	Brian Snyder	Tech Traders account at Bank of America, SC
8/09/02	\$89,000	Trust funds	Janelle Wagner	Tech Traders account at Bank of America, SC
7/01/03	\$80,000	Trust funds	Janelle Wagner	Tech Traders account at Bank of America, SC
8/08/03	\$25,000	Trust funds	Janelle Wagner	Tech Traders account at Bank of America, SC

7. The following distributions of funds were made on account of my investment with Tech Traders

<u>Date</u>	<u>Amount</u>	<u>Source of Payment</u>	<u>Recipient of Transfer</u>
10/04/02	\$25,000	Tech Traders, Inc.	Snyder Financial Services, Key Bank Account
08/11/03	\$25,000	Tech Traders, Inc.	Snyder Financial Services, Key Bank Account

8 Check and complete all statements below that are accurate

a. No other person has an interest of any kind in my investment with Tech Traders;

b. The following persons have a share of my investment with Tech Traders (list such persons names addresses): _____

c. I act as trustee or representative of one or more other persons who hold a beneficial interest in my investment with Tech Traders (list names and addresses of all persons holding such beneficial interests): _____

x d. I am a representative or agent of the following entity which invested funds with Tech Traders (list name and address of entity and your relationship to the entity): Janelle A. Wagner, Family Trust, 11441 Longwater Chase Ct., Fort Myers, Florida 33908

9 I have enclosed with this form copies of all available statements received regarding my investment with Tech Traders.

10. I have also enclosed with this form copies of all checks, wire transfer advices and all other records of transfer relating to the funds deposited in or withdrawn from Tech Traders

I have enclosed copies of all other documents in my possession or control in connection with my investment with Tech Traders, including correspondence, e-mails, K-1 or other tax forms, subscription agreements, independent verification agreements, and private placement memoranda

12. I am aware of the following persons who also had an investment with Tech

Traders (list names and addresses of such persons):

I aver and affirm that the above information is true and correct under penalty of perjury.

Janelle A Wagner
Signature

Name: Janelle A Wagner
(Please type or print)

Address: 11441 Longwater Chase
ST MYERS E
33908

Home Phone: 239 415 4834

Daytime Phone: 239 872 6315

Fax: 239 415 4839

Email Address: Janwag50@comcast.net

State of _____
County of _____

Subscribed to before me
this _____ day of _____,
2005.

Notary Public

Please return to:

Cheryl Baran
Sachnoff & Weaver, Ltd.
30 South Wacker Drive
Suite 2900
Chicago, Illinois 60606

Tech Traders, LTD
Quarterly Report
Nov 01 2003 to Jan 31 2004
For Illustration of Calculations

Account Number: BKS-492

TOTALS			
	<u>Lender's Acct</u>	<u>Note Direct</u>	<u>Note Credits</u>
Beginning Bal -11-01-03	\$393,047	\$189,000	\$204,047
Plus: New Loans	\$0	0	0
Less: Withdrawals	\$0	0	0
Quarterly Pool	30.19%	\$118,661	
		\$0	
Gross Pool Credits		\$118,661	
Sub-Total		\$118,661	
Less: O&E	10.00%	(\$11,866)	
Sub-Total		\$106,795	
Less: Tech Trader's Credit	40.00%	(\$42,718)	
Sub-Total		\$64,077	
Lender's Total credit	60.00%	\$64,077	\$64,077
Ending Balance		\$457,124	\$189,000
			\$268,124
Accrued Interest-Notes			
		Direct	
Balance Nov 01, 2003		\$18,086	
Quarterly		\$4,725	
Balance Jan 31, 2004		\$22,811	
Payments on Note			
Transferred as Requested			
			\$0

Exhibit B

AFFIDAVIT OF JANELLE A. WAGNER

Comes now Janelle A. Wagner, and having been duly sworn upon her oath, deposes and says that.

1. I, Janelle A. Wagner, am an adult U.S. citizen, and am a resident of the State of Florida.

2. I have personal knowledge of the events described herein, and would be competent to testify regarding such matters.

3. I am the Trustee of the Janelle A. Wagner Family Trust.

4. In early 2002, I discussed investment opportunities with Mr. Brian Snyder of Snyder Financial Services. Mr. Snyder had provided me with investment advice on many occasions in the past. Mr. Snyder made me aware of an opportunity to invest money with Tech Traders, Inc., which I understood to be a legitimate hedge fund for commodities trading.

5. In late March 2002, I wired funds from the Janelle Wagner Family Trust account at 5th Third Bank to the KeyBank account of Snyder Financial Services, with instructions for Mr. Snyder to transfer the funds on to Tech Traders, Inc. It is my understanding that Mr. Snyder did so.

6. It was always my understanding that the funds belonged to the Janelle Wagner Family Trust, and that Mr. Snyder was merely acting as my representative.

7. I transferred funds directly to Tech Traders on three subsequent occasions: 1) On 8/09/02 I wired \$89,000 to an account owned by Tech Traders, Inc.; 2) On 7/01/03 I wired \$80,000 to an account owned by Tech Traders, Inc.; and 3) On 8/08/03 I wired \$25,000 to an account owned by Tech Traders, Inc.

8. Promissory Notes were issued by Tech Traders, Inc. to Snyder Financial Services for

the funds I invested on behalf of the Janelle Wagner Family Trust, and I was provided copies of such Notes.

9. Quarterly statements were issued by Tech Traders, Inc., to Snyder Financial Services, and were then sent to me.

10. On two occasions I requested a withdrawal of funds from Tech Traders. On 10/04/02 I requested a withdrawal of \$25,000. The funds were sent to Snyder Financial Services, and then were delivered to me. On 8/11/03 I requested a withdrawal of \$25,000. The funds were again sent to Snyder Financial Services and then were delivered to me.

11 In late May, 2004, I received a letter from Mr. Snyder advising me that a complaint had been filed against Tech Traders, Inc. by the Commodity Futures Trading Commission, and that the accounts of Tech Traders had been frozen.

12. I have reviewed the Claim Form for Investors With Tech Traders form provided Sachnoff & Weaver, and completed by Snyder Financial Services on my behalf. I agree with the information provided therein, and wish for the claim of the Janelle A. Wagner Family Trust to be submitted and approved.

affirm, under the penalties for perjury, that the foregoing representations are true.

3/22/05
Dated

Janelle A. Wagner
Janelle A. Wagner