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

| | | |
|--------------------------------|---|------------------------------|
| COMMODITY FUTURES TRADING |) | |
| COMMISSION, |) | |
| |) | No.: 04-cv-1512 (RBK) |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| EQUITY FINANCIAL GROUP, LLC, |) | |
| TECH TRADERS, INC., TECH |) | |
| TRADERS, LTD., MAGNUM |) | Hearing Date: August 4, 2006 |
| INVESTMENTS, LTD., MAGNUM |) | |
| CAPITAL INVESTMENTS, LTD., |) | |
| VINCENT J. FIRTH, ROBERT W. |) | |
| SHIMER, COYT E. MURRAY, and J. |) | |
| VERNON ABERNETHY, |) | |
| |) | |
| Defendants. |) | |

**BRIEF IN SUPPORT OF EQUITY RECEIVER’S MOTION TO COMPEL
VINCENT FIRTH TO PRODUCE TAX RETURNS**

Stephen T. Bobo, as Equity Receiver (the “Receiver”) for Defendant Vincent Firth (“Mr. Firth”), moves this Court to compel Mr. Firth to produce copies of his income tax returns for the years 2004 and 2005. Mr. Firth, who is under receivership in a *fraud* case involving a multi-million dollar Ponzi scheme and has derived income from investor funds over the past 5 years, refuses to produce these returns. All the reasons stated in Motion of Equity Receiver To Compel

Robert Shimer To Produce Tax Returns (Document No. 295) apply with equal force to Mr. Firth and for those reasons, the Court should compel Mr. Firth to produce his tax returns as well.

CONCLUSION

For the foregoing reasons, the Court should grant this motion to compel and require Mr. Firth to reimburse the receivership estate for the expenses incurred in making the motion under Fed. R. Civ. Pro. 37(a)(4)(A).

DATED: June 29, 2006

Respectfully submitted,
STEPHEN T. BOBO
Equity Receiver

By: /s/ Jeffrey A. Carr
One of his attorneys

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