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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**  
Judge Robert B. Kugler

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.  
-----X

**COYT E. MURRAY'S ANSWER TO THE AMENDED COMPLAINT**

Defendant Coyt E. Murray ("Murray"), by and through his attorneys, Gusrae Kaplan & Bruno, PLLC, as and for his Answer to the First Amended Complaint dated June 24, 2004 (the "Amended Complaint") filed by Plaintiff Commodity Futures Trading Commission (the "CFTC" or "Plaintiff") 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), (c), (d), (e) and (g) of the Amended Complaint, but admits upon information and belief that Defendant J. Vernon Abernethy resides in Gastonia, North Carolina and is a CPA. Murray denies the allegations contained in paragraph 1 (f) of the

Amended Complaint, but admits that Murray resides in or about Tega Cay, South Carolina and during the relevant time prior to the appointment of the Equity Receiver was the President of Defendant Tech Traders, Inc. and Magnum Capital Investments Ltd.

2. Denies the allegations contained in paragraph 2 of the Amended Complaint, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertains to other Defendants.

3. Denies the allegations contained paragraph 3 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

4. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Amended Complaint.

5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Amended Complaint.

6. Denies the allegations contained in paragraph 6 of the Amended Complaint that pertain to Murray. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

7. Denies the allegations contained in paragraph 7 of the Amended Complaint that pertain to Murray, and denies information and knowledge sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

8. Paragraph 8 of the Amended Complaint contains a statement of Plaintiff's goals in this proceeding and do not properly call for an admission or denial. To the extent that this paragraph contains allegations of fact, Murray denies the allegations contained in paragraph 8 of the Amended Complaint.

9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Amended Complaint, 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 Amended Complaint that pertain to Murray. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Amended 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 of the Amended Complaint, 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 of the Amended Complaint, 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 of the Amended Complaint, 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 of the Amended Complaint, 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 of the Amended Complaint, 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 of the Amended Complaint.

17. Denies the allegations contained in paragraph 17 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

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

19. Denies the allegations contained in paragraph 19 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

20. Denies the allegations contained in paragraph 20 of the Amended Complaint.

21. Denies the allegations contained in paragraph 21 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the said paragraph that pertain to other Defendants.

22. Denies the allegations contained in paragraph 22 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the said paragraph that pertain to other Defendants.

23. Denies the allegations contained in paragraph 23 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the said paragraph that pertain to other Defendants.

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

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

26. Denies the allegations contained in paragraph 26 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the said paragraph that pertain to other Defendants.

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

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

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

30. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of the Amended Complaint.

31. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of the Amended Complaint.

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

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

34. Denies the allegations contained in paragraph 34 of the Amended Complaint that pertain to Murray, but denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

35. Denies the allegations contained in paragraph 35 of the Amended Complaint that pertain to Murray, but denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

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

37. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of the Amended Complaint.

38. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of the Amended Complaint.

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

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

41. Denies the allegations contained in paragraph 41 of the Amended Complaint pertaining to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

42. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of the Amended Complaint.

43. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of the Amended Complaint.

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

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

46. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Amended Complaint.

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

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

49. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the Amended Complaint.

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

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

52. Restates and reaffirms the answers set forth in paragraphs 1 through 51 herein.

53. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Amended Complaint, and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

54. Denies the allegations contained in paragraph 54 of the Amended Complaint that pertain to Murray, but denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

55. The allegations contained in paragraph 55 of the Amended Complaint call for a conclusion of law to which no response is required, but to the extent that a response is required,

Murray denies the allegations contained in said paragraph that pertain to him, but denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

56. The allegations contained in paragraph 56 of the Amended Complaint call for a conclusion of law to which no response is required, but to the extent that a response is required, Murray denies the allegations contained in said paragraph that pertain to him, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the said paragraph that pertain to other Defendants..

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

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

59. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the Amended Complaint.

60. Denies the allegations contained in paragraph 60 of the Amended Complaint pertaining to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

61. Restates and reaffirms the answers set forth in paragraphs 1 through 60 herein.

62. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of the Amended Complaint, and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

63. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of the Amended Complaint.

64. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of the Amended Complaint.

65. Denies the allegations contained in paragraph 65 of the Amended Complaint.

66. The allegations contained in paragraph 66 call for a conclusion of law to which no response is required, but to the extent a response is required, Murray denies the allegations contained in said paragraph that pertain to him, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

67. The allegations contained in paragraph 67 call for a conclusion of law to which no response is required, but to the extent a response is required, Murray denies the allegations contained in said paragraph that pertain to him, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

68. The allegations contained in paragraph 68 call for a conclusion of law to which no response is required, but to the extent a response is required, Murray denies the allegations contained in said paragraph that pertain to him, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the said paragraph that pertain to other Defendants.

69. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the Amended Complaint.

70. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of the Amended Complaint.

71. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of the Amended Complaint.

72. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the Amended Complaint.

73. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the Amended Complaint.

74. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 74 of the Amended Complaint.

75. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of the Amended Complaint.

76. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of the Amended Complaint.

77. Denies the allegations contained in paragraph 77 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

78. Restates and reaffirms the answers set forth in paragraphs 1 through 77 herein.

79. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of the Amended Complaint.

80. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the Amended Complaint.

81. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of the Amended Complaint.

82. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the Amended Complaint.

83. Denies the allegations contained in paragraph 83 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

84. Denies the allegations contained in paragraph 84 of the Amended Complaint.

85. Restates and reaffirms the answers set forth in paragraphs 1 through 84 herein.

86. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 86 of the Amended Complaint.

87. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of the Amended Complaint.

88. Denies the allegations contained in paragraph 88 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the said paragraph that pertain to other Defendants..

89. Denies the allegations contained in paragraph 89 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in said paragraph that pertain to other Defendants.

90. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of the Amended Complaint.

91. Restates and reaffirms the answers set forth in paragraphs 1 through 90 herein.

92. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92 of the Amended Complaint, and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

93. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 93 of the Amended Complaint.

94. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 94 of the Amended Complaint.

95. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 95 of the Amended Complaint, and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

96. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 96 of the Amended Complaint.

97. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 97 of the Amended Complaint.

98. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 98 of the Amended Complaint, and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

99. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 99 of the Amended Complaint.

100. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100 of the Amended Complaint.

101. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 101 of the Amended Complaint, and respectfully refers the Court to the text of the section of the Act cited and relevant law defining the statute.

102. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 102 of the Amended Complaint.

103. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 103 of the Amended Complaint.

104. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 104 of the Amended Complaint.

105. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 105 of the Amended Complaint.

106. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 106 of the Amended Complaint.

107. Denies the allegations contained in paragraph 107 of the Amended Complaint that pertain to Murray, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the said paragraph that pertain to other Defendants.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

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

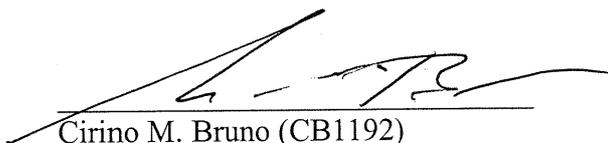
**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

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

*[Remainder of page intentionally left blank]*

**WHEREFORE**, Coyt E. Murray respectfully requests judgment: dismissing the Amended Complaint; granting Murray costs and disbursement of this action; and granting such other and further relief the Court deems just and proper.

Dated: New York, New York  
October 11, 2004



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**CERTIFICATE OF SERVICE**

I, Justin H. Cohen, Esq. hereby certify that on October 11, 2004, I caused copies of the foregoing **Coyt E. Murray's Answer to the Amended Complaint** to be served upon the following addressees by fax and first class mail as indicated below:

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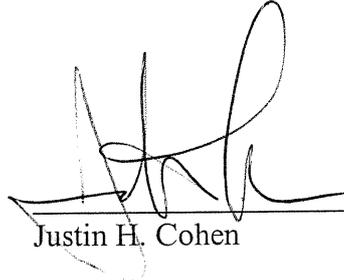
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