

A

**STERLING TRUST (ANGUILLA) LTD.**

**37927-A**

**G20-37923**

**RCF 004305**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

COMMODITY FUTURES TRADING COMMISSION	)	
Plaintiff,	)	Civil Action No. 04cv1512
	)	
vs.	)	
	)	Honorable Robert B. Kugler
EQUITY FINANCIAL GROUP LLC,	)	
TECH TRADERS, INC., TECH TRADERS, LTD.	)	
MAGNUM INVESTMENTS, INC., VINCENT J.	)	
FIRTH, ROBERT W. SHIMER, COYT E. MURRAY	)	
and J. VERNON ABERNATHY	)	
Defendants	)	
	)	

**CLAIM FORM FOR INVESTORS  
WITH TECH TRADERS**

1. I am over the age of 18 and I am an Accountant of Sterling Trust (Anguilla) Ltd., an Anguillan company operating in The Valley, Anguilla which invested funds for commodity trading with Tech Traders, Ltd. or Tech Traders, Inc. ("Tech Traders").
2. Sterling Trust (Anguilla) Ltd. received statements from Tech Traders under the account name Sterling Capital Account reflecting account number 37927-A.
3. Sterling Trust (Anguilla) Ltd. was aware of Tech Traders through a related entity, Sterling Alliance Ltd. Based on the returns certified by J. Vernon Abernethy, CPA, the Directors of Sterling Trust (Anguilla) Ltd. approved the investment of funds with Tech Traders.
4. According to the most recent information provided to Sterling Trust (Anguilla) Ltd., as of February 29, 2004, I understand that the amount of the account balance shown for Sterling Trust (Anguilla) Ltd.'s account with Tech Traders is \$419,023.
5. Sterling Trust (Anguilla) Ltd., received information regarding the amount of it's equity with Tech Traders from Tech Traders via Lynn Sherrill of Lake Wylie Tax Service.

6. On the dates listed, the following amounts were transferred to fund Sterling Trust (Anguilla) Ltd.'s investment with Tech Traders:

<u>Date</u>	<u>Amount</u>	<u>Source of Funds Used to Invest</u>	<u>Company Making Transfer</u>	<u>Recipient of Transfer</u>
12/31/02	250,000.00	Existing Tech Traders Acct #5143	Sterling Alliance Ltd.	Bank of America Tech Traders Inc, FBO Sterling Trust (Anguilla) Ltd. Capital Acct

7. The following distributions of funds were made on account of Sterling Trust (Anguilla) Ltd. investment with Tech Traders:

<u>Date</u>	<u>Amount</u>	<u>Source of Payment</u>	<u>Recipient of Transfer</u>
12/24/03	100,000.00	Bank of America Tech Traders Inc. Wire	Sterling Trust (Anguilla) Ltd.

8. The receiver has also placed a freeze order on funds and Treasury Notes in account G20 37923 being held in the name of Sterling Trust (Anguilla) Ltd. at Man Financial Inc. Sterling Trust (Anguilla) Ltd. disputes that these funds were deposited with Tech Traders and claim them as it's own. The following deposits were made to the Sterling Trust (Anguilla) Ltd. account at Man Financial Inc.

<u>Date</u>	<u>Amount</u>	<u>Source of Funds Used to Invest</u>	<u>Company Making Transfer</u>	<u>Recipient of Transfer</u>
3/31/04	45,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Man Financial Inc. A/C G20 37923 FBO Sterling Trust (Anguilla) Ltd.

2/26/04	45,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
2/10/04	45,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
1/5/04	45,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
12/04/03	45,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
11/12/03	45,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
9/26/03	45,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
9/5/03	200,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
8/29/03	40,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
7/29/03	40,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
6/27/03	25,250.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.

RCF 004308

6/3/03	54,750.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
4/24/03	235,580.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
4/24/03	1,000,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
3/18/03	500,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd	Sterling Trust (Anguilla) Ltd.
2/5/03	350,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd.	Sterling Trust (Anguilla) Ltd.
1/30/03	240,000.00	Sterling Trust (Anguilla) Ltd. Investment Funds	Sterling Trust (Anguilla) Ltd.	Sterling Trust (Anguilla) Ltd.

The following withdrawals of funds were made from Sterling Trust (Anguilla) Ltd.  
account at Man Financial Inc.

<u>Date</u>	<u>Amount</u>	<u>Source of Payment</u> Man Financial Inc. Sterling Trust (Anguilla) Ltd. A/C G20 37923	<u>Recipient of Transfer</u>
2/12/04	425,000.00	Wire	Sterling Trust (Anguilla) Ltd.
4/2/03	500,000.00	Wire	Sterling Trust (Anguilla) Ltd.

9. The following persons and or entities have a beneficial interest in Sterling Trust (Anguilla) Ltd.'s Capital investment with Tech Traders:

Howell & Vernice Woltz

Hiram Martin

Joseph Brice.

10. I have examined the books and records of Sterling Trust (Anguilla) Ltd., and affirm that none of the defendants in the above-captioned action are the record owners of any of the funds invested with Tech Traders.

11. I have enclosed with this form copies of all available statements received regarding Sterling Trust (Anguilla) Ltd.'s investment with Tech Traders.

12. I have also enclosed with this form copies of all checks, wire transfer advices and all other records of transfer in Sterling Trust (Anguilla) Ltd.'s possession and control relating to the funds deposited in or withdrawn from Tech Traders.

13. Sterling Trust (Anguilla) Ltd. previously has provided copies of all other documents in its possession or control which were received, executed or forwarded in connection with Sterling Trust (Anguilla) Ltd.'s investment with Tech Traders. If you require an additional copy of those documents, one will be provided.

14. I am aware of the following persons and or entities who also had an investment with Tech Traders: Howell & Vernice Woltz, Sterling ACS Ltd., Aquarius Holdings International Ltd., Security Funding Ltd., Magnolia Holdings Ltd., Sterling Alliance Ltd., Sterling Investment Management Ltd., Sterling Bank Limited, Sterling Casualty and Insurance Ltd., Strategic Investment Portfolio LLC.

**RCF 004310**

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

  
\_\_\_\_\_  
Signature

Name: Ms. Dematee Mohan

Address: British American House

Marlborough Street & Navy Lyon

Nassau Bahamas

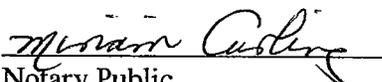
Daytime Phone: (242) 325-7573

Fax: (242) 325-8030

Email Address: info@sterlinggroup.bs

Country: BAHAMAS

Subscribed to before me  
this 21<sup>st</sup> day of September, 2004

  
\_\_\_\_\_  
Notary Public

**RCF 004311**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

COMMODITY FUTURES TRADING COMMISSION, )  
 )  
Plaintiff, )  
 )  
vs. ) Civil Action  
 ) No. 04-1512 (RBK)  
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. )

The discovery deposition of VERNICE C. WOLTZ,  
taken pursuant to subpoena and the Federal Rules of Civil  
Procedure for the United States District Courts, reported by  
Susan Soble, a Certified Shorthand Reporter and Notary  
Public for the County of Cook and State of Illinois, at 525  
West Monroe Street, Suite 1100, Chicago, Illinois, on  
Tuesday, August 9, 2005, at the hour of 8:38 o'clock a.m.

SUSAN SOBLE ASSOCIATES, P.C.  
Certified Shorthand Reporters  
79 West Monroe Street  
Chicago, Illinois 60603  
(312) 630-0022

1 all these deposits would have come from Tech Traders. Some  
2 would have come from Sterling Trust from funds that they  
3 were managing.

4 But the amounts that were 45,000, while, you  
5 know, I cannot confirm it by looking at the records, those  
6 are the amounts that came from Tech Traders for that fee.  
7 There are some sums of money here that were not paid from  
8 Tech Traders.

9 Q So those were not fees.

10 A Well, deposit was made for 240,000 on January 30,  
11 2003. Those were not fees. If I remember correctly, the  
12 total fees that have been paid from Tech Traders to Sterling  
13 Trust for holding this collateral for them in the event it  
14 was required, I believe the total amount was \$475,000.

15 Q Okay. But your testimony is that 240,000 was not  
16 fees, is that correct?

17 A That is correct.

18 MR. RUSSO: Is that the only one that wasn't a fee?

19 THE WITNESS: The 240,000 wasn't a fee. The one on  
20 February 5, 2003, 350,000 was not a fee. The one March 18,  
21 2003 of 500,000 was not a fee. April 24, 2003 of a million  
22 dollars was not a fee. The one on 4-24-2003, that number  
23 doesn't ring a bell for me, but we can go back and look at,  
24 you know, see what that is. 6-3-2003, the 54,000, I believe

1 that was a partial fee. The 25,250 -- the total fee, the  
2 fee totals \$475,000, to the best of my recollection. The  
3 transfer on September 5, 2003 was not a fee.

4 BY MS. SANGHAVI:

5 Q And these fees were paid in order for Trust  
6 Anguilla to maintain certain funds with Man Financial for  
7 Tech Traders' benefit, correct?

8 MR. RUSSO: Objection to the form of the question.

9 THE WITNESS: The funds were not maintained at Man  
10 for Tech Traders, Man Financial, Man Pro. They were not  
11 maintained there for that benefit. They were in T-bills.  
12 They were earning -- they had interest. Obviously those  
13 interests were not accrued to Tech Traders' benefit.

14 The money wasn't there to be used for any  
15 other reason except if Tech Traders had a margin call where  
16 they needed money immediately quickly that can be liquidated  
17 right away, and for that reason that money was there, of  
18 course, it was accruing interest, we were getting paid a fee  
19 on it.

20 That's the nature of our business. We are  
21 trying to make money for the trust that we have  
22 discretionary investment for.

23 BY MS. SANGHAVI:

24 Q And how much was the trust required to maintain in  
SUSAN SOBLE ASSOCIATES, P.C. (312) 630-0022

1 that account in order to earn the \$45,000 monthly fee?

2 A We weren't required to maintain any amount. Any  
3 amount that was in the account would earn a fee and we can  
4 add to that, you know, based on an agreement and approved  
5 arrangement with Tech Traders. For instance, we added a  
6 couple hundred thousand dollars on September 5. Obviously  
7 the fee would have increased at that time.

8 But that was only upon approval of Mr. Murray  
9 that that was okay to, that he would agree to pay the fee on  
10 it. If we withdrew money from the account, obviously he  
11 would not pay a fee on that money.

12 Q So there was no minimum amount that you were  
13 required to maintain in that account in order to get the  
14 fee?

15 A No.

16 Q The initial contribution of \$240,000?

17 A Yes.

18 Q On January 30, '03, where did those funds come  
19 from?

20 A Looks like it came from Sterling Trust (Anguilla)  
21 Limited.

22 Q Where did Sterling Trust (Anguilla) Limited get the  
23 funds from?

24 A Without looking at those records, I wouldn't be

1 able to trace that.

2 Q I'm showing you a record which is receiver's  
3 exhibit 145.

4 A Okay.

5 Q Do you see, this is a transfer from Tech Traders to  
6 Sterling Trust (Anguilla) in the exact amount of \$240,000 on  
7 January 24, '03.

8 A Okay. I think we discussed that return of those  
9 funds before.

10 Q When you say -- go ahead.

11 A I think item 7 on your exhibit SE-4, the first line  
12 says these funds were wired to Tech Traders on January 16  
13 and returned on January 30.

14 Is that what you're referring to in this  
15 exhibit?

16 Q Could you refer me to the page on SE-4 that you're  
17 -- I see it.

18 A Page four, item 7.

19 Q If you look at page three, item 6, those funds, the  
20 company making the transfer was Sterling ACS Trust --

21 A Being made for the benefit of Sterling Trust  
22 (Anguilla) managed funds account.

23 Q Do you know why Sterling ACS was making a transfer  
24 for the benefit of Sterling Trust (Anguilla)?

1 A The funds may have arrived into the account and  
2 they were making that transaction on behalf of Sterling  
3 Trust (Anguilla) Limited.

4 Q They were outside investor funds, correct?

5 A Clients of Sterling Trust.

6 Q But the clients of Sterling Trust would make a  
7 deposit into a Sterling ACS Limited account?

8 A We have clients of Sterling Trust that are also  
9 clients of Sterling ACS.

10 Q And so Tech Traders wired that money back, well,  
11 receiver's exhibit 145 shows it was wired back on January  
12 24, '03, correct?

13 A Okay, yeah, it says the 30th here. We may have  
14 received it on the 30th. I don't know.

15 Q And then they, Sterling Trust (Anguilla) deposited  
16 the \$240,000 into the Man Financial account, correct?

17 A I don't know if it was the same 240,000. It  
18 appears that way. I wouldn't be able to say without  
19 actually looking at the records.

20 Q Money is fairly fungible so --

21 A Well, it is.

22 Q Okay. Let's look at the deposit made by Sterling  
23 Trust (Anguilla) on April 24, '03, the \$235,580.

24 A Okay.  
SUSAN SOBLE ASSOCIATES, P.C. (312) 630-0022

1 Q Capital money in Sterling ACS.

2 A That's going to Sterling Trust?

3 Q Right.

4 A I don't think so.

5 Q That wouldn't be likely?

6 A No.

7 Q So it's likely client money?

8 A It's probably managed funds, yes.

9 Q Mark this as the next one.

10 (Depo Exhibit No. 355 was marked

11 for identification.)

12 BY MS. STREIT:

13 Q Exhibit 355, Ms. Woltz, first page is a Sterling  
14 Trust (Anguilla) account statement for 37923 for April 2003.  
15 It was produced by the Sterling entities and then the  
16 following pages are documents that we received from BB&T  
17 bank.

18 It shows on the first page of the GNI  
19 statement a wire received on April 25 for a million dollars,  
20 see that?

21 A Mm-hm.

22 Q And if you'd look at the next page, the wire  
23 transfer information shows Sterling Trust (Anguilla) wired a  
24 million dollars to the Man Financial account on April 25,  
SUSAN SOBLE ASSOCIATES, P.C. (312) 630-0022

1 2003.

2 See that on the second page?

3 A Okay.

4 Q And it appears that that came from account, direct  
5 deposit account that ends in numbers 3157.

6 If you look at the next page of the exhibit,  
7 third page, it shows a deposit ticket on April 7, 2003 for  
8 \$2,552,554.87 deposited into the account ending in number  
9 3157. The fourth page of the exhibit is a debit memo  
10 showing \$1,552,554.87 being debited from a Sterling Trust  
11 account ending in account number 4568. Then the last  
12 document is a funds transfer report from BB&T and the second  
13 entry item on there shows that on April 4, 2003, Le Masurier  
14 James and Chin transferred \$3,052,554.87 to Sterling Trust's  
15 account ending in the numbers 4568.

16 So it appears from these documents that a  
17 million dollars of this money that originally came from Le  
18 Masurier James and Chin was deposited in the 37923 account.

19 Do you know whose money that is, that \$3  
20 million from Le Masurier James and Chin.

21 A It's probably managed trust funds.

22 Q So it's probably client funds.

23 A Most likely, yes.

24 Q Okay. Do you know why the money was originally  
SUSAN SOBLE ASSOCIATES, P.C. (312) 630-0022

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1 wired from Le Masurier James and Chin to account 4568 at  
2 BB&T and then transferred to another BB&T account?

3 A Yeah. I think it came into the Sterling Trust  
4 operating account, if my memory serves me well, and the  
5 funds were transferred to different places. The balance  
6 went into the 3157 account, which is probably where any  
7 subsequent monies may have been transferred from.

8 Q So the 4568 account, that was an operating account  
9 for Sterling Trust at BB&T?

10 A I think it was.

11 Q And the 3157 is what kind of an account?

12 A Interest bearing investment account.

13 Q And so that account would hold client funds?

14 A Yes.

15 Q Was 4568 supposed to hold client funds?

16 A It wasn't supposed to, no. So if any funds came  
17 in, we would transfer it out.

18 Q Is that why you had two different accounts at BB&T  
19 in Sterling Trust's name; the one for the 4568 account was  
20 the operating account and the 3157 account was the  
21 investment account for clients?

22 A That is the premise of what was done, yes.

23 Q Mark this as the next one, please.

24

SUSAN SOBLE ASSOCIATES, P.C. (312) 630-0022

1 STATE OF ILLNOIS )  
2 COUNTY OF C O O K ) SS.

3  
4 I, Susan Soble, Certified Shorthand Reporter  
5 and Notary Public for the County of Cook and State of  
6 Illinois, do hereby certify that VERNICE C. WOLTZ was first  
7 duly sworn to testify the whole truth and nothing but the  
8 truth, and that the within deposition was reported  
9 stenographically by me and reduced to computer  
10 transcription, and is a true and correct transcript of the  
11 testimony so given by said witness at the time and place  
12 specified hereinbefore.

13 I further certify that I am not a relative or  
14 employee or attorney or counsel of any of the parties, or a  
15 relative or employee of such attorney or counsel, or  
16 financially interested directly or indirectly in this  
17 action.

18 In witness whereof, I have hereunto set my  
19 hand and affixed my hand and seal at Chicago, Illinois, this  
20 22nd day of August, 2005.

21  
22 \_\_\_\_\_  
23 Susan Soble, C.S.R. #84-902  
24 Notary Public.

C

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

COMMODITY FUTURES TRADING COMMISSION )

Plaintiff, )

Civil Action No. 04cv1512 )

vs. )

Honorable Robert B. Kugler )

EQUITY FINANCIAL GROUP LLC, )

TECH TRADERS, INC., TECH TRADERS, LTD. )

MAGNUM INVESTMENTS, INC., VINCENT J. )

FIRTH, ROBERT W. SHIMER, COYT E. MURRAY )

and J. VERNON ABERNATHY )

Defendants )

CLAIM FORM FOR INVESTORS  
WITH TECH TRADERS  
AMENDED 3/31/2005

1. I am over the age of 18 and I am a Director of Sterling ACS Ltd., a Bahamian company operating in Nassau, Bahamas which invested funds for commodity trading with Tech Traders, Ltd. or Tech Traders, Inc. ("Tech Traders").

2. Sterling ACS Ltd. received statements from Tech Traders under the account name Strategic (Bahamas) Portfolio reflecting account number 9102.

3. Sterling ACS Ltd. was aware of Tech Traders through a related entity, Sterling Alliance Ltd. Based on the returns certified by J. Vernon Abernethy, CPA, the Directors of Sterling ACS Ltd. approved the investment of funds with Tech Traders.

4. According to the most recent information provided to Sterling ACS Ltd. as of February 29, 2004, I understand that the amount of the account balance shown for Sterling ACS Ltd.'s account with Tech Traders is \$1,837,018.

5. Sterling ACS Ltd. received information regarding the amount of it's equity with Tech Traders from Tech Traders via Lynn Sherrill at Lake Wylie Tax Service.

6. On the dates listed, the following amounts were transferred to fund Sterling ACS Ltd.'s investment with Tech Traders:

<u>Date</u>	<u>Amount</u>	<u>Source of Funds Used to Invest</u>	<u>Company Making Transfer</u>	<u>Recipient of Transfer</u>
				Bank of America Tech Traders Inc, FBO
1/15/2004	225,000.00	Investment Account	AQ Holdings Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
12/30/03	50,000.00	Investment Account	AQ Holdings Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
10/23/03	30,000.00	Investment Account	AQ Holdings Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
9/12/03	230,000.00	Investment Account	Sterling ACS Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
8/11/03	25,000.00	Investment Account	AQ Holdings Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
5/16/03	20,000.00	Investment Account	Sterling ACS Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
2/6/03	100,000.00	Investment Account	AQ Holdings Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
1/16/03	100,000.00	Investment Account	Sterling ACS Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
10/2/02	200,000.00	Investment Account	Sterling ACS Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio

9/4/02	200,000.00	Investment Account	Sterling ACS Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio
8/28/02	300,000.00	Investment Account	Sterling ACS Ltd.	Sterling ACS Ltd Strategic (Bahamas) Portfolio

7. The following distributions of funds were made on account of Sterling ACS

Ltd.'s investment with Tech Traders:

<u>Date</u>	<u>Amount</u>	<u>Source of Payment</u> Bank of America Tech Traders Inc.	<u>Recipient of Transfer</u>
1/22/04	109,747.00	Wire Transfer	Sterling ACS Ltd.
12/29/03	90,813	Wire	Sterling ACS Ltd.
10/29/03	82,816	Check	Sterling ACS Ltd.
9/16/03	94,135	Wire	Sterling ACS Ltd.
8/29/03	14,700.00	Check ( from Magnum Investments Ltd.)	Sterling ACS Ltd.
7/22/03	73,791.00	Wire	Sterling ACS Ltd.
7/10/03	220,000.00	Wire	Sterling ACS Ltd.
5/1/2003	2,000.00	Check Unable to locate copy	Sterling ACS Ltd/ Vernice Woltz
4/23/03	94,996.00	Wire	Sterling ACS Ltd.
1/24/03	26,320.40	Wire	Sterling ACS Ltd.
9/19/02	100,000.00	Check	Sterling ACS Ltd./ W3 Commerce

8. The following persons and or entities have a beneficial interest in Sterling ACS

Ltd.'s investment with Tech Traders:

Howell & Vernice Woltz 255 Woltz Lane, Advance NC 27006, USA

Sterling ACS Ltd. Registered Address: British American House, Ground Floor Marlborough Street & Navy Lyon Road Nassau, Bahamas

Aquarius Holdings International Ltd. Registered Address: British American House, Ground Floor Marlborough Street & Navy Lyon Road Nassau, Bahamas

Magnolia Holdings Ltd Registered Address: British American House, Ground Floor Marlborough Street & Navy Lyon Road Nassau, Bahamas

Security Funding Ltd. Registered Address: British American House, Ground Floor Marlborough Street & Navy Lyon Road Nassau, Bahamas

9. I have examined the books and records of Sterling ACS Ltd. and affirm that none of the defendants in the above-captioned action are the record owners of any of the funds invested with Tech Traders.

10. I have enclosed with this form copies of all available statements received regarding Sterling ACS Ltd.'s investment with Tech Traders.

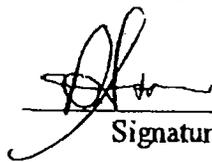
11. I have also enclosed with this form copies of all checks, wire transfer advices and all other records of transfer in Sterling ACS Ltd.'s possession and control relating to the funds deposited in or withdrawn from Tech Traders.

12. Sterling ACS Ltd. previously has provided copies of all other documents in its possession or control which were received, executed or forwarded in connection with Sterling

ACS Ltd.'s investment with Tech Traders. If you require an additional copy of those documents, one will be provided.

13. I am aware of the following persons and or entities who also had an investment with Tech Traders: Sterling Investment Management Ltd., Sterling Bank Limited, Sterling Trust (Anguilla) Ltd., Sterling Casualty and Insurance Ltd., Sterling Alliance Ltd., Strategic Investment Portfolio LLC

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

  
Signature

Name: Mr. Dicienzo Storr

Address: British American House

Marlborough Street & Navy Lyon

Nassau, Bahamas

Daytime Phone: (242) 325 - 7573

Fax: (242) 325 - 8030

Email Address: info@sterlinggroup.bs

Country BAHAMAS

Subscribed to before me  
this \_\_\_ day of \_\_\_\_\_, 2005

  
Notary Public