

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 )  
TRADERS, LTD., MAGNUM )  
CAPITAL INVESTMENTS, LTD., )  
MAGNUM INVESTMENTS, LTD., )  
VINCENT J. FIRTH, ROBERT W. )  
SHIMER, COYT E. MURRAY, and J. )  
VERNON ABERNETHY, )

Honorable Robert B. Kugler

Defendants. )

**AFFIDAVIT OF STEPHEN T. BOBO  
IN SUPPORT OF MOTION FOR ORDER FIXING  
ALLOWED AMOUNT OF NON-INVESTOR CREDITOR CLAIMS**

Stephen T. Bobo, first being duly sworn, states and answers as follows:

1. I am an attorney licensed to practice in the State of Illinois and the District of Columbia.

2. I have personal knowledge of the contents of this affidavit and am competent to testify regarding them.

3. Since April 1, 2004, I have served initially as Temporary Equity Receiver and thereafter as Equity Receiver for certain of the Defendants, including Tech Traders, Inc., Tech Traders, Ltd., and Equity Financial Group, LLC.

4. On December 18, 2006, the Court entered an order authorizing and directing me to carry out a creditor claim process. In particular, the Court ordered me to distribute a creditor

claim form and an explanatory letter, attached hereto as Exhibit A, to all non-investor creditors of Tech Traders and Equity.

5. As a result, on January 5, 2007, I caused to be mailed the creditor claim form and accompanying letter to all potential non-investor creditors of Tech Traders and Equity. These non-investor creditors included former employees of Tech Traders and Equity and recipients of payments from Tech Traders and Equity during the period of January 1, 2002 through April 1, 2004, such as landlords, utilities, supply and service companies, and federal, state and local taxing authorities. These creditors were also identified from invoices and other requests for payment received by Tech Traders and Equity.

6. In a number of instances, the mailings were returned to me because of incorrect contact information. With the assistance of my counsel, I attempted to locate new contact information for these potential creditors. When such contact information was located, I distributed the claim form and accompanying letter to these creditors.

7. In response, I received proofs of claim from three non-investor creditors, including PSNC Energy, Laure D. Hadder, CPA, and Bette Oberecker. Based on the claim forms and supporting documentation submitted by these creditors, I propose the following treatment:

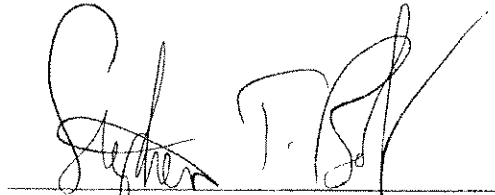
8. PSNC Energy: PSNC Energy submitted a proof of claim against Tech Traders, Inc. for natural gas services provided to Tech Traders at its former place of business in Gastonia, North Carolina. Along with the completed claim form, PSNC produced an invoice showing that Tech Traders owes a total of \$102.98 for these services. A copy of the claim form and invoice are attached hereto as Exhibit B. I recommend that PSNC's claim be allowed in the amount of \$102.98 against Tech Traders, Inc.

9. Laure D. Hadder, CPA: Ms. Hadder and her accounting firm, Laure D. Hadder, CPA, submitted a proof of claim against Tech Traders for payroll and bookkeeping services provided to Tech Traders, Inc. between February 2004 and July 2004. In particular, the claim indicates that Ms. Hadder seeks \$260.00 for services rendered from February through April 2004 (the "May 2004 Invoice") and \$756.25 for services performed between May and July 2004 (the "July 2004 Invoice"). I do not take issue with most of the fees sought in the May 2004 Invoice. Of the total amount sought, \$243.75 relates to services performed prior to the Court's April 1, 2004 freeze order. Copies of the claim form and invoices are attached hereto as Exhibit C. I object to \$16.25 sought in the May 2004 Invoice, as well as the July 2004 Invoice in its entirety, because the services for which fees are sought were performed *after* the Court's April 1, 2004 freeze order. I therefore recommend that Ms. Hadder's claim be allowed in the amount of \$243.75 for the services her accounting firm performed prior to April 1, 2004.

10. Bette Oberecker: Ms. Oberecker submitted a proof of claim against Equity and Vincent J. Firth for an outstanding debt owed to her by Vincent and Patricia Firth. In particular, the claim indicates that this debt originated from the Firths' purchase of Ms. Oberecker's home in 1990. According to her claim form and supporting documentation, in 1992, Ms. Oberecker obtained a judgment note in the amount of \$67,500.00 against the Firths for this outstanding debt. A copy of the Oberecker claim form is attached hereto as Exhibit D. This real estate transaction between Ms. Oberecker and the Firths, however, does not relate in anyway to Equity or its dealings on behalf of Shasta with Tech Traders. Consequently, I recommend that Ms. Oberecker's claim be disallowed in full.

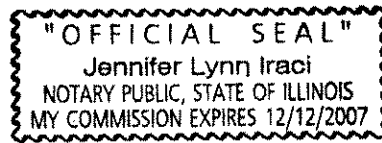
11. These three non-investor creditors have been served with a notice regarding my motion for an order fixing the amount of non-investor creditor claims, which is attached hereto as Exhibit E.

Affiant says nothing further



Stephen T. Bobo

SUBSCRIBED AND SWORN  
to before me this 22<sup>nd</sup> day of  
June, 2007



NOTARY PUBLIC

CHILIB-967484.2

# **Exhibit A**

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

**CLAIM FORM FOR NON-INVESTOR CREDITORS OF  
EQUITY FINANCIAL GROUP, LLC, TECH TRADERS, INC.,  
OR TECH TRADERS, LTD.**

Please complete the following statements, make any changes necessary to ensure accuracy, and notarize, sign and return the form by \_\_\_\_\_, 2007 to the address shown on the bottom of this page. **If you are a creditor (other than an investor) of one or more of the following entities: Equity Financial Group, LLC, Tech Traders, Inc., or Tech Traders, Ltd., or are a creditor of one of those Defendants in more than one way, please make a copy of this claim form and complete a separate form for each of your claims.**

Please return by \_\_\_\_\_, 2007 to:

Alison Katon  
Sachnoff & Weaver, Ltd.  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606

1. I have a claim against (check all appropriate boxes):

Equity Financial Group, LLC

Tech Traders, Inc.

Tech Traders, Ltd.

in the amount of \$ \_\_\_\_\_.

2. The basis for my claim is (for example: goods sold, services performed, taxes, tort claims, money loaned, wages, salaries, compensation or other benefits):

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**Please be as specific as possible and attach documentary proof of your claim.**

3. My claim accrued or was incurred on: \_\_\_\_\_.
4. I have attached copies of all documents in my possession or control that evidence my claim, including correspondence, promissory notes, invoices, purchase orders, contracts, security agreements, and/or account statements. To the extent these documents are not available, I have attached an explanation of why they are not available.
5. To the best of my knowledge, all just and lawful offsets, payments, and credits have been deducted from the amount of my claim.

6. I believe that my claim is secured by property of the Tech Traders, Inc., Tech Traders, Ltd., or Equity Financial Services, LLC:

Yes  No

If you have checked "Yes" in response to Question 6, please answer Question 7.

7. The basis for this contention is (please describe the property securing your claim, attach any documents supporting your secured status and list the value of such property):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

\_\_\_\_\_  
Signature

Name: \_\_\_\_\_  
(Please type or print)

Address: \_\_\_\_\_  
\_\_\_\_\_

State of \_\_\_\_\_

Phone: \_\_\_\_\_

County of \_\_\_\_\_

Email Address: \_\_\_\_\_

Subscribed to before me  
this \_\_\_\_ day of \_\_\_\_\_,  
2007.

Fax: \_\_\_\_\_

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



Please return by \_\_\_\_\_, 2007 to:

**Alison Katon  
Sachnoff & Weaver, Ltd.  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606**

[DATE]

Re: *Commodity Futures Trading Commission v.  
Equity Financial Group, LLC, et al.*  
Case No. 04 CV 1512

Dear Sir or Madam:

I serve as the Court-appointed Equity Receiver of certain defendants, including Equity Financial Group, LLC, Tech Traders, Inc., and Tech Traders, Ltd. (the "Defendants") in the above-referenced matter pending in the United States District Court for the District of New Jersey. The Defendants' records indicate that you may have a claim against one or more of the Defendants.

On [MONTH] [DAY], 2006, the Court entered an order requiring all non-investor creditors of the Defendants to complete and return the enclosed claim form within forty-five (45) days from the date of this letter. The claim form must be accompanied by documentary proof evidencing the nature and amount of your claim(s) against the Defendants. Should you fail to return the completed form and supporting documentation in a timely manner, you may be barred from participating in a distribution of the receivership assets. If you are a creditor of more than one of the Defendants, or are a creditor of one of the Defendants in more than one way, please make a copy of the enclosed claim form and complete a separate form for each of your claims.

Once I have received the information requested on the claim forms, I will formulate a proposal for distributing receivership assets to the Defendants' creditors. Ultimately, the Court will have to determine whether to approve my proposal. I appreciate your assistance in providing all of the information requested in a timely manner so that I may move forward with presenting the Court with a distribution proposal.

[DATE]  
Page 2

If you have any questions about the creditor claim form, please contact Raven Moore, one of my attorneys. Raven Moore's e-mail address is [rmoore@sachnoff.com](mailto:rmoore@sachnoff.com), her phone number is 312-207-6457 and her fax number is 312-207-6400.

Very truly yours,

Stephen T. Bobo  
Equity Receiver

Enclosure

# **Exhibit B**

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 )

TRADERS, LTD., MAGNUM )

INVESTMENTS, LTD., MAGNUM )

CAPITAL INVESTMENTS, LTD., )

VINCENT J. FIRTH, ROBERT W. )

SHIMER, COYT E. MURRAY, and J. )

VERNON ABERNETHY, )

Defendants. )

Honorable Robert B. Kugler

CLAIM FORM FOR NON-INVESTOR CREDITORS OF  
EQUITY FINANCIAL GROUP, LLC, TECH TRADERS, INC.,  
OR TECH TRADERS, LTD.

Please complete the following statements, make any changes necessary to ensure accuracy, and notarize, sign and return the form by February 19, 2007 to the address shown on the bottom of this page. If you are a creditor (other than an investor) of one or more of the following entities: Equity Financial Group, LLC, Tech Traders, Inc., or Tech Traders, Ltd., or are a creditor of one of those Defendants in more than one way, please make a copy of this claim form and complete a separate form for each of your claims.

Please return by February 19, 2007 to:

Alison Katon  
Sachnoff & Weaver, Ltd.  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606

1. I have a claim against (check all appropriate boxes):

Equity Financial Group, LLC

Tech Traders, Inc.

Tech Traders, Ltd.

in the amount of \$ 102,98

2. The basis for my claim is (for example: goods sold, services performed, taxes, tort claims, money loaned, wages, salaries, compensation or other benefits):

Natural Gas Service

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**Please be as specific as possible and attach documentary proof of your claim.**

3. My claim accrued or was incurred on: The final bill was generated in 2004.
4. I have attached copies of all documents in my possession or control that evidence my claim, including correspondence, promissory notes, invoices, purchase orders, contracts, security agreements, and/or account statements. To the extent these documents are not available, **I have attached an explanation of why they are not available.**
5. To the best of my knowledge, all just and lawful offsets, payments, and credits have been deducted from the amount of my claim.

6. I believe that my claim is secured by property of the Tech Traders, Inc., Tech Traders, Ltd., or Equity Financial Services, LLC:

Yes  No

If you have checked "Yes" in response to Question 6, please answer Question 7.

7. The basis for this contention is (please describe the property securing your claim, attach any documents supporting your secured status and list the value of such property):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

*Michelle R. Brabham-Reed*  
Signature

Name: Michelle R. Brabham-Reed  
(Please type or print)

Address: PSNC ENERGY

1426 Main Street Mail Code 130

Columbia, SC 29218

Phone: (803) 217-6092

Email Address: mreed3@scana.com

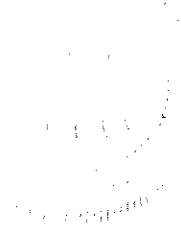
Fax: (803) 933-7387

State of South Carolina

County of Richland

Subscribed to before me  
this 7<sup>th</sup> day of February,  
2007.

*Gretchen C. Pool*  
Notary Public



Please return by February 19, 2007 to:

Alison Katon  
Sachnoff & Weaver, Ltd.  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606



Account Number: 3-1981-0110-7866

FN0410 00 0 10 3198101107866

Total Amount Due By 11/09/04	\$ 102.98
Amount Enclosed	

TECH TRADERS, INC.  
PO BOX 12571  
GASTONIA NC 28052-0035

Service Address:  
1331 E Garrison Blvd Apt C  
Gastonia NC 28054-5141

PSNC Energy  
PO BOX 100256  
Columbia, SC 29202-3256

New Mailing Address: \_\_\_\_\_

3198101107866060000001029804100000010298

IMPORTANT: Return this portion with your payment and/or mailing address change so that the return address shows through the envelope window. Payment can be accepted in CASH, CHECK, MONEY ORDER, CASHIER'S CHECK, or a CREDIT CARD using BillMatrix by calling 1-800-450-9159.



Service Address: 1331 E Garrison Blvd Apt C  
Gastonia NC 28054-5141

TECH TRADERS, INC.  
PO BOX 12571  
GASTONIA NC 28052-0035

PSNC Energy Customer Care Center:  
1-877-776-2427

### FINAL BILL NOTICE

90303

Account Number	Notice Date	Total Amount Due	Pay By
3-1981-0110-7866	10/19/04	\$102.98	11/09/04

We are contacting you about your past due balance of \$102.98, which has been forwarded to the Receivables Management Department for collection.

You can prevent having this balance turned over to an outside collection agency and reported to the credit bureau by paying your bill immediately. This debt, once listed on your credit report, will remain on your credit report for at least six (6) years. This could negatively impact your ability to obtain additional credit. Your report would be updated to reflect that the debt has been paid if payment is received; however, it will remain on your credit report once it is listed with the credit bureau.

If you have paid this amount since the notice date, please accept our thanks. You may wish to contact us toll-free at 1-877-776-2427 to confirm receipt of that payment.

Please use one or more of the following payment options: **CASH, CHECK, MONEY ORDER, CASHIER'S CHECK, or a CREDIT CARD** using BillMatrix by calling 1-800-450-9159. (BillMatrix requires a convenience fee of \$3.00 for this service). Payment may also be made by visiting a PSNC payment agency. If payment is made at a payment agency or through BillMatrix, please call 1-877-776-2427 to confirm payment and to avoid termination of service.

Please call a representative in Receivables Management to make payment arrangements if you are unable to pay the balance in full. We can be reached at 704-810-3394.

Please let us know if we can help with any of your future energy needs. If you have a new mailing address, please provide it in the space above.

If this notice does not agree with your records or if you require assistance with payment options, please contact PSNC Energy immediately at 1-877-776-2427 toll-free. Para interpretacion de esta noticia muy importante, por favor llame a PSNC Energy y pida un representante se habla Espanol.

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 )

TRADERS, LTD., MAGNUM )

INVESTMENTS, LTD., MAGNUM )

CAPITAL INVESTMENTS, LTD., )

VINCENT J. FIRTH, ROBERT W. )

SHIMER, COYT E. MURRAY, and J. )

VERNON ABERNETHY, )

Defendants. )

Honorable Robert B. Kugler

**CLAIM FORM FOR NON-INVESTOR CREDITORS OF  
EQUITY FINANCIAL GROUP, LLC, TECH TRADERS, INC.,  
OR TECH TRADERS, LTD.**

Please complete the following statements, make any changes necessary to ensure accuracy, and notarize, sign and return the form by February 19, 2007 to the address shown on the bottom of this page. **If you are a creditor (other than an investor) of one or more of the following entities: Equity Financial Group, LLC, Tech Traders, Inc., or Tech Traders, Ltd., or are a creditor of one of those Defendants in more than one way, please make a copy of this claim form and complete a separate form for each of your claims.**

Please return by February 19, 2007 to:

Alison Katon  
Sachnoff & Weaver, Ltd.  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606

1. I have a claim against (check all appropriate boxes):

- Equity Financial Group, LLC
- Tech Traders, Inc.
- Tech Traders, Ltd.

in the amount of \$ 1,016.25

2. The basis for my claim is (for example: goods sold, services performed, taxes, tort claims, money loaned, wages, salaries, compensation or other benefits):

Bookkeeping and Payroll Services performed - see attached invoices.

Please be as specific as possible and attach documentary proof of your claim.

3. My claim accrued or was incurred on: 5/6/04 and 7/6/04 Invoice Dates.
4. I have attached copies of all documents in my possession or control that evidence my claim, including correspondence, promissory notes, invoices, purchase orders, contracts, security agreements, and/or account statements. To the extent these documents are not available, **I have attached an explanation of why they are not available.**
5. To the best of my knowledge, all just and lawful offsets, payments, and credits have been deducted from the amount of my claim.

# **Exhibit C**

6. I believe that my claim is secured by property of the Tech Traders, Inc., Tech Traders, Ltd., or Equity Financial Services, LLC:

Yes  No

If you have checked "Yes" in response to Question 6, please answer Question 7.

7. The basis for this contention is (please describe the property securing your claim, attach any documents supporting your secured status and list the value of such property):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

Laure D. Hadder  
Signature

Name: Laure D. Hadder  
(Please type or print)

Address: 1516 Village Harbor Dr.  
Lake Wylie, SC 29710

State of SC

Phone: 803-831-0263

County of York

Email Address: laurehadder@haddercpa.com

Subscribed to before me  
this 9<sup>th</sup> day of JANUARY,  
2007.

Fax: 803-831-5416

[Signature]  
Notary Public

# Laure D. Hadder, CPA

*Services Offered:*

*Tax Planning and Preparation  
 Personal Financial Planning  
 Small Business Consulting  
 Bookkeeping and Payroll*

5/6/2004

Tech Traders, Inc.  
 P.O. Box 12571  
 Gastonia, NC 28052

## INVOICE

DATE	DESCRIPTION	STAFF	HOURS	RATE	AMOUNT
<b>PAYROLL</b>					
2/12/2004	Prepared payroll & liab. checks. Figured increase for Coyt	JH - ...	0.75	65.00	48.75
2/24/2004	Bi-weekly payroll & liability checks	JH - ...	0.75	65.00	48.75
3/11/2004	Bi-weekly payroll	CW ...	0.75	65.00	48.75
3/30/2004	Talked w/Sandy regarding payroll; salary checks; bonus checks; prepared liabilities; prepared garnishment check to NC	CW ...	1.5	65.00	97.50
4/13/2004	Faxed Feb & March payroll summary to Sandi	CW ...	0.25	65.00	16.25
<b>Total Due</b>					<b>\$260.00</b>

(803) 831-0263

1516 Village Harbor Drive  
 Lake Wylie, South Carolina 29710

Fax (803) 831-5416

# Laure D. Hadder, CPA

*Services Offered:*

*Tax Planning and Preparation  
 Personal Financial Planning  
 Small Business Consulting  
 Bookkeeping and Payroll*

7/6/2004

Tech Traders, Inc.  
 P.O. Box 12571  
 Gastonia, NC 28052

## INVOICE

DATE	DESCRIPTION	STAFF	HOURS	RATE	AMOUNT
BOOKKEEPING					
5/4/2004	Printed all invoices; copied checks from 2000 to 2002	CW ...	2.25	55.00	123.75
5/4/2004	Copied 2001-2004 documents	MW ...	5.25	55.00	288.75
5/5/2004	Copied payroll checks from 2003 to 2004	CW ...	3	55.00	165.00
5/5/2004	Type letter for Tech Traders investigation	MW ...	2.75	55.00	151.25
6/2/2004	Talked w/Sandi regarding NC letter; talked w/Atty Steve Bobo regarding invoice payment	CW ...	0.5	55.00	27.50
<b>Total Due</b>					<b>\$756.25</b>

# **Exhibit D**



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 )  
TRADERS, LTD., MAGNUM )  
INVESTMENTS, LTD., MAGNUM )  
CAPITAL INVESTMENTS, LTD., )  
VINCENT J. FIRTH, ROBERT W. )  
SHIMER, COYT E. MURRAY, and J. )  
VERNON ABERNETHY, )

Honorable Robert B. Kugler

Defendants. )

**CLAIM FORM FOR NON-INVESTOR CREDITORS OF  
EQUITY FINANCIAL GROUP, LLC, TECH TRADERS, INC.,  
OR TECH TRADERS, LTD.**

Please complete the following statements, make any changes necessary to ensure accuracy, and notarize, sign and return the form by February 19, 2007 to the address shown on the bottom of this page. **If you are a creditor (other than an investor) of one or more of the following entities: Equity Financial Group, LLC, Tech Traders, Inc., or Tech Traders, Ltd., or are a creditor of one of those Defendants in more than one way, please make a copy of this claim form and complete a separate form for each of your claims.**

Please return by February 19, 2007 to:

Alison Katon  
Sachnoff & Weaver, Ltd.  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606

1. I have a claim against (check all appropriate boxes):

- Equity Financial Group, LLC *Vincent J. Fittl*
- Tech Traders, Inc.
- Tech Traders, Ltd.

in the amount of \$ 62,500 + int.

2. The basis for my claim is (for example: goods sold, services performed, taxes, tort claims, money loaned, wages, salaries, compensation or other benefits):

Sold House - 936 W. Highland st.  
Whitchell, Pa - in 1990  
"Remainder of Note never paid by Fittl"  
See - Enclosure

Please be as specific as possible and attach documentary proof of your claim.

3. My claim accrued or was incurred on: 1990 - 5/8/1992  
*1st Note \$87,500 - New Note 67,500*  
*"Oct 16-2003"*  
*8d. 5,000 - Bal. now 62,500*

4. I have attached copies of all documents in my possession or control that evidence my claim, including correspondence, promissory notes, invoices, purchase orders, contracts, security agreements, and/or account statements. To the extent these documents are not available, I have attached an explanation of why they are not available.

5. To the best of my knowledge, all just and lawful offsets, payments, and credits have been deducted from the amount of my claim.

6. I believe that my claim is secured by property of the Tech Traders, Inc., Tech Traders, Ltd., or Equity Financial Services, LLC:

Yes  No

If you have checked "Yes" in response to Question 6, please answer Question 7.

7. The basis for this contention is (please describe the property securing your claim, attach any documents supporting your secured status and list the value of such property):

*Since he never paid his debt to us, he apparently was using our monies to fund his inappropriate business ventures*

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

*Bette A. Oberecker*  
Signature

Name: BETTE A. OBERECKER  
(Please type or print)

Address: 413 Nesbitt Park Ave.  
Davenport, FL 33897-9246

Phone: 863 420-9419

Email Address: \_\_\_\_\_

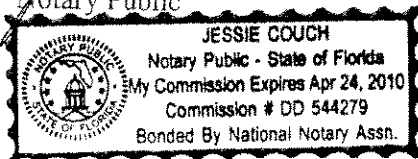
Fax: \_\_\_\_\_

State of Florida

County of Polk

Subscribed to before me  
this 17<sup>th</sup> day of January  
2007.

*Jessie Couch*  
Notary Public



Please return by February 19, 2007 to:

Alison Katon  
Sachnoff & Weaver, Ltd.  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606

# **Exhibit E**

Matthew H. Adler (MA-4720)  
Jeffrey A. Carr (JC-1130)  
Pepper Hamilton LLP  
301 Carnegie Center  
Suite 400  
Princeton, NJ 08543  
Tel: (609) 452-0808

**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 )  
TRADERS, LTD., MAGNUM )  
INVESTMENTS, LTD., MAGNUM )  
CAPITAL INVESTMENTS, LTD., )  
VINCENT J. FIRTH, ROBERT W. )  
SHIMER, COYT E. MURRAY, and J. )  
VERNON ABERNETHY, )**

**Honorable Robert B. Kugler**

**Defendants. )**

**NOTICE TO NON-INVESTOR CREDITORS REGARDING  
MOTION OF EQUITY RECEIVER FOR ORDER FIXING  
AMOUNT OF NON-INVESTOR CREDITOR CLAIMS**

TO: ALL NON-INVESTOR CREDITORS THAT SUBMITTED CLAIM FORMS  
TO THE RECEIVER

Please take notice that on June 26, 2007 Stephen T. Bobo (the "Receiver"), the Equity Receiver for certain of the Defendants, including Equity Financial Group, LLC, Tech Traders, Inc., and Tech Traders, Ltd., filed a motion with this Court requesting an order fixing the amount of non-investor creditor claims based on the proofs of claim submitted to the Receiver by three non-investor creditors (the "Creditor Claim Motion").

Please take further notice that in the Receiver's Creditor Claim Motion, the Receiver proposes allowing in full the claim submitted by PSNC Energy, allowing in part the claim of Laure D. Hadder, CPA, and objecting in full to the claim of Bette Oberecker. The Receiver discusses his proposed treatment of these claims in greater detail in his Affidavit, attached hereto as Exhibit 1.

Please take further notice that the Court has fixed Friday, July 6, 2007 as the date by which any objection or other response to the Creditor Claim Motion must be placed in writing with the name and number of the case prominently displayed on the first page, signed and filed in duplicate with the Clerk of this Court, with a copy simultaneously served upon the Receiver. The address of the Clerk of the Court is:

Clerk of the Court  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Federal Building & U.S. Courthouse  
1 John F. Gerry Plaza  
Camden, NJ 08101

The Receiver's address is:

Stephen T. Bobo  
REED SMITH LLP  
10 South Wacker Drive  
Chicago, IL 60606

The Receiver will serve copies of all objections he receives to the Creditor Claim Motion on the parties to this case. The Receiver may file a reply no later than Friday, July 13, 2007 to any objections received. He will serve a copy of his reply on any person who files an objection, as well as on the parties in this case.

Ultimately, the Court will determine whether to adopt the Receiver's proposed treatment of the non-investor creditor claims. The return date for this motion is Friday, July 20, 2007, which is the date by which the Court may rule on it. If the Court

determines that a hearing is necessary to resolve these claims, the Receiver will provide notice to the non-investor creditors that submitted proofs of claim to the Receiver and all persons who filed a response to the Receiver's motion, as well as to the parties in this case.

Stephen T. Bobo  
Equity Receiver,



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Counsel for the Receiver

Dated: June 26, 2007



# Exhibit 1

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 )  
TRADERS, LTD., MAGNUM )  
CAPITAL INVESTMENTS, LTD., )  
MAGNUM INVESTMENTS, LTD., )  
VINCENT J. FIRTH, ROBERT W. )  
SHIMER, COYT E. MURRAY, and J. )  
VERNON ABERNETHY, )

Honorable Robert B. Kugler

Defendants. )

**AFFIDAVIT OF STEPHEN T. BOBO  
IN SUPPORT OF MOTION FOR ORDER FIXING  
ALLOWED AMOUNT OF NON-INVESTOR CREDITOR CLAIMS**

Stephen T. Bobo, first being duly sworn, states and answers as follows:

1. I am an attorney licensed to practice in the State of Illinois and the District of Columbia.

2. I have personal knowledge of the contents of this affidavit and am competent to testify regarding them.

3. Since April 1, 2004, I have served initially as Temporary Equity Receiver and thereafter as Equity Receiver for certain of the Defendants, including Tech Traders, Inc., Tech Traders, Ltd., and Equity Financial Group, LLC.

4. On December 18, 2006, the Court entered an order authorizing and directing me to carry out a creditor claim process. In particular, the Court ordered me to distribute a creditor

claim form and an explanatory letter, attached hereto as Exhibit A, to all non-investor creditors of Tech Traders and Equity.

5. As a result, on January 5, 2007, I caused to be mailed the creditor claim form and accompanying letter to all potential non-investor creditors of Tech Traders and Equity. These non-investor creditors included former employees of Tech Traders and Equity and recipients of payments from Tech Traders and Equity during the period of January 1, 2002 through April 1, 2004, such as landlords, utilities, supply and service companies, and federal, state and local taxing authorities. These creditors were also identified from invoices and other requests for payment received by Tech Traders and Equity.

6. In a number of instances, the mailings were returned to me because of incorrect contact information. With the assistance of my counsel, I attempted to locate new contact information for these potential creditors. When such contact information was located, I distributed the claim form and accompanying letter to these creditors.

7. In response, I received proofs of claim from three non-investor creditors, including PSNC Energy, Laure D. Hadder, CPA, and Bette Oberecker. Based on the claim forms and supporting documentation submitted by these creditors, I propose the following treatment:

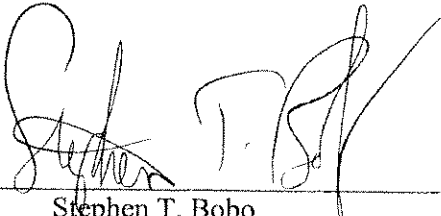
8. PSNC Energy: PSNC Energy submitted a proof of claim against Tech Traders, Inc. for natural gas services provided to Tech Traders at its former place of business in Gastonia, North Carolina. Along with the completed claim form, PSNC produced an invoice showing that Tech Traders owes a total of \$102.98 for these services. A copy of the claim form and invoice are attached hereto as Exhibit B. I recommend that PSNC's claim be allowed in the amount of \$102.98 against Tech Traders, Inc.

9. Laure D. Hadder, CPA: Ms. Hadder and her accounting firm, Laure D. Hadder, CPA, submitted a proof of claim against Tech Traders for payroll and bookkeeping services provided to Tech Traders, Inc. between February 2004 and July 2004. In particular, the claim indicates that Ms. Hadder seeks \$260.00 for services rendered from February through April 2004 (the "May 2004 Invoice") and \$756.25 for services performed between May and July 2004 (the "July 2004 Invoice"). I do not take issue with most of the fees sought in the May 2004 Invoice. Of the total amount sought, \$243.75 relates to services performed prior to the Court's April 1, 2004 freeze order. Copies of the claim form and invoices are attached hereto as Exhibit C. I object to \$16.25 sought in the May 2004 Invoice, as well as the July 2004 Invoice in its entirety, because the services for which fees are sought were performed *after* the Court's April 1, 2004 freeze order. I therefore recommend that Ms. Hadder's claim be allowed in the amount of \$243.75 for the services her accounting firm performed prior to April 1, 2004.

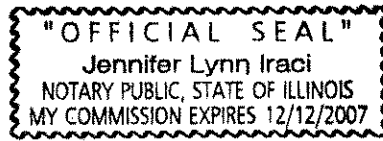
10. Bette Oberecker: Ms. Oberecker submitted a proof of claim against Equity and Vincent J. Firth for an outstanding debt owed to her by Vincent and Patricia Firth. In particular, the claim indicates that this debt originated from the Firths' purchase of Ms. Oberecker's home in 1990. According to her claim form and supporting documentation, in 1992, Ms. Oberecker obtained a judgment note in the amount of \$67,500.00 against the Firths for this outstanding debt. A copy of the Oberecker claim form is attached hereto as Exhibit D. This real estate transaction between Ms. Oberecker and the Firths, however, does not relate in anyway to Equity or its dealings on behalf of Shasta with Tech Traders. Consequently, I recommend that Ms. Oberecker's claim be disallowed in full.

11. These three non-investor creditors have been served with a notice regarding my motion for an order fixing the amount of non-investor creditor claims, which is attached hereto as Exhibit E.

Affiant says nothing further

  
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Stephen T. Bobo

SUBSCRIBED AND SWORN  
to before me this 22<sup>nd</sup> day of  
June, 2007



  
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NOTARY PUBLIC

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