

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

VS.

MAURICIO CHAVEZ, GIORGIO
BENVENUTO and CryptoFX, LLC,

Defendants.

CBT Group, LLC,

Relief Defendant.

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CIVIL ACTION NO. 4:22-CV-03359

JUDGE ANDREW S. HANEN

**RECEIVER'S THIRD CERTIFIED INTERIM FEE APPLICATION FOR THE
RECEIVER AND HIS COUNSEL**

Pursuant to paragraphs 57-62 of this Court’s Order Appointing Receiver (“Receivership Order”) (Doc. No. 11), John Lewis, Jr. (“Receiver”), the Court-appointed Receiver for Mauricio Chavez (“Chavez”), Giorgio Benvenuto (“Benvenuto”), CryptoFX, LLC (“CryptoFX”) and CBT Group, LLC (“CBT”) (collectively, the “Receivership Defendants”), files his Third Certified Fee Application for the Receiver and His Counsel, showing the Court as follows:

SUMMARY OF FEE REQUEST

1. This Third Certified Interim Fee Application for the Receiver and His Counsel (“TCIFA”) covers the period from April 1, 2023 to June 30, 2023 (the “Application Period”) and is submitted in accordance with the Receivership Order, the local rules of this Court, and the Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission (“SEC”) (the “Billing Instructions”). Receivership Order at ¶¶ 56 – 58.

2. This is the third fee application that the Receiver has made for himself and his counsel. On February 23, 2023, the Receiver filed his first certified fee application covering the period from September 29, 2022 to December 31, 2022, which was granted by the Court on March 23, 2023. (Doc. Nos. 54, 67). On June 16, 2023, the Receiver filed his second certified fee application covering the period from January 1, 2023 to March 31, 2023, which at the time of this filing has not been ruled on. (Doc No. 75). The Receiver also filed his Third Interim Fee Application for Hays Financial Consulting, LLC (“HFC”) on August 8, 2023, at the request of HFC, which at the time of this filing has not been ruled on. (Doc. No. 85).

3. The total fees incurred during the Application Period by the Receiver and professionals retained by the Receiver are as follows: \$37,695.00 John Lewis, Jr. (*see* Receiver’s Invoice attached as **Exhibit A**); \$157,852.00 Shook, Hardy & Bacon L.L.P. (“SHB”) (*see* SHB Invoice attached as **Exhibit B**). The Receiver’s professional fees listed above have been reduced by \$10,185.00. Further, his counsel’s fees have been reduced by \$59,636.00.

4. The Receiver served a copy of this TCIFA, together with all exhibits and billing information to counsel for the SEC. The Receiver and counsel for the SEC have conferred about the TCIFA and its compliance with the SEC Billing Guidelines and this Court’s Receivership Order. The SEC does not oppose the Receiver’s Application or the relief requested herein.

5. The Receiver respectfully requests that this Court enter an order approving and authorizing, on an interim basis, the payment of fees incurred during the TCIFA as follows: to the Receiver in the amount of \$37,695.00; to Shook Hardy and Bacon, LLP in the amount of \$157,852.00. The Receiver further asks that the Court authorize the Receiver to reimburse the out-of-pocket costs and expenses incurred by the Receiver in the ordinary course of the administration and operation of the Receivership in the aggregate amount of \$47,650.38.

STANDARDIZED FUND ACCOUNTING REPORT

6. Attached as **Exhibit C** is the Standardized Fund Accounting Report (“SFAR”) for the Receivership for the Application Period.

CASE STATUS

7. Cash on Hand: The Receivership Estate has \$3,589,050 deposited in four trust accounts named for each of the Defendants as of the end of the Application Period (June 30, 2023). These funds were received by (i) taking possession of cash located at the Defendants’ office located at 1124 Blalock, Houston, Texas 77055 (\$53,345.56); (ii) taking possession of safes located at the Defendants’ office (\$392,765.37); (iii) taking possession of First Community Credit Union bank accounts owned by Benvenuto (\$451,448.14); (iv) taking possession of Bank of America bank accounts owned by Benvenuto (\$21,325.14); (v) taking possession of a Simmons bank account owned by Benvenuto (\$80,763.55); (vi) taking possession of a Simmons bank account owned by CBT (\$247,916.46); (vii) taking possession of a Regions bank account owned by Chavez (\$781.62); (viii) proceeds from liquidating Coinbase, Inc. account (\$982,924.31); (ix) proceeds from liquidating Blockchain.com account (\$1,161,140.95); (x) taking possession of the balance of a retainer from Burford Perry LLC (\$155,631.00); (xx) taking possession of the balance of retainers from Gerger Hennessy & Martin LLP (\$214,487.50); taking possession of the balance of retainers from Jones Walker LLP (\$102, 228.70); taking possession of CryptoFX funds turned over by Defendant Mauricio Chavez (\$55,000); proceeds from liquidating real property at 0 Hogan Lane (\$64, 758.11); and proceeds from liquidating televisions (\$3,040.00). *See* Schedule of Receipts and Disbursements, attached as **Exhibit D**.

8. All four Receivership trust accounts are held with Flagstar Bank, N.A., a wholly-owned subsidiary of New York Community Bankcorp, Inc. The four trust accounts were

previously held with Signature Bank, N.A., which was acquired by Flagstar in March 2023. Flagstar acquired all deposits of Signature Bank. All Receivership deposits are fully insured by the FDIC and the full faith and credit of the U.S. government up to \$250,000 and are fully collateralized and insured by a separate surety bond through the Receiver's banking vendor for any amounts above \$250,000. Additionally, Flagstar continues to be an approved depository by the U.S. Trustee in bankruptcy cases.

9. Other Assets: In addition to the cash on hand listed above, as of the end of the Application Period (June 30, 2023), the Receiver has on hand the following assets.

Asset	Estimated Amount/Value
2021 Mercedes-Benz GLE AMG	\$60,000
2022 BMW X6 M50i (not fully paid off)	\$30,000
2020 Volkswagen Tiguan	\$15,000
Various Laptops and desktop computers	\$5,000
Real Property: Mack Washington, Hempstead, TX	\$1,080,000
Real Property: 28 Lawrence Marshall, Dr. Hempstead, TX	\$68,000
Bitcoin (BTC)	\$14,031.12
Tether (USDT)	\$62,923.86
Solana (SOL)	\$.10

10. It is the Receiver's plan to prudently market real estate and other assets of the Receivership for the highest prices obtainable. The Court approved the Receiver's Motions to Approve the Sale of real property located at 0 Hogan Lane and 28 Lawrence Marshall Dr. (Doc. Nos. 57, 62). The estate netted \$64,758.11 from the sale of Hogan Lane. The Receiver expects the sale of the Lawrence Dr. property to net a similar amount. (The lots are of a similar size and condition). Additionally, the Court granted the Receiver's Motion to approve the sale of personal property relating to Chavez's 2020 Volkswagen Tiguan, (Doc. No. 67) as well as the sale of Chavez's Mercedes and BMW (Doc. No. 70). The BMW was financed through Santander

Consumer USA and has a current payoff amount of approximately \$37,000. The Receiver anticipates to net approximately \$30,000 from the sale of the BMW and approximately \$60,000 from the sale of the Mercedes.

11. The Receiver is continuing his investigation to locate additional assets of the Receivership Estate and will develop a distribution plan, subject to the Court's approval.

12. Expenses: The Receiver and his team have incurred administrative expenses in the amount of \$47,650.38 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$47,650.38 were advanced by SHB.

13. Investor/Creditor Claims: At this point, the Receiver has not promulgated a claims procedure or determined the validity of any possible investor claims. The Receiver is still evaluating investments made with CryptoFX based upon CryptoFX and CBT records, documents produced by third parties, deposition testimony, and interviews with former CryptoFX and CBT employees as well as sales agents/sponsors/leaders and investors. At present, the Receiver, through an incomplete forensic review, has credible evidence that estimates that approximately 40,000 individuals invested in CryptoFX.

14. The Receiver is working on formulating a claims process, including procedures for (i) providing notice to potential claimants, (ii) receiving and reviewing claims, (iii) recommending to the court payment or denial of claims; and (iv) disposing of claims. To date, the Receiver has not dispersed any funds to any investors.

15. At this early stage, it is difficult to predict how long it will take the Receiver to complete his work. As the Receivership moves forward, the Receiver and his team will continue their efforts to most efficiently recover and realize the value of assets for the benefit of the Receivership Estate.

16. Receiver Claims: The Receiver's investigation of claims against third parties is in its early stages. Recovered CryptoFX business records indicate transfers of large amounts of money to Defendants' family members and associates, CryptoFX sales persons/sponsors/leaders, related business entities, and other third parties, all of which support the strong likelihood that the Receivership Estate will have substantial causes of action against these third parties.

17. Additionally, because the Ponzi scheme was primarily a cash-based scheme, it is going to require significant forensic and/or investigatory resources to unravel the claims of the Receivership estate. Forensic accounting data indicates that the majority of the investments as well as payments of returns on CryptoFX contracts were made in cash.

18. Furthermore, many investors paid and were paid in cryptocurrency. The current investigation of the available cryptocurrency transactions conducted by BlockTrace, the third party engaged by the Receiver to assist with cryptocurrency transaction tracing, has revealed that even though Defendants raised over \$300 million in investor funds, their gains from cryptocurrency trading was minimal and woefully insufficient to pay the promised 15% monthly returns as well as the commissions and bonuses to sponsors/leaders. The Receiver will have substantial claims for bonuses and commissions for a large number of third parties and will have to evaluate collectability from these parties. Other claims will have to be researched and evaluated.

19. The Receiver filed a notice of receivership in all relevant jurisdictions where assets of the Receivership are believed to be located.

FEE APPLICATION

20. On September 19, 2022, the SEC filed a Complaint against Defendants Chavez, Benvenuto, CryptoFX, and CBT, along with an application for the appointment of a receiver for

the Receivership Entities. (Doc. Nos. 3 & 6). On September 29, 2022, the Court appointed John Lewis, Jr. to serve as Receiver over all the assets of the Receivership Defendants. (Doc. No. 11).

21. The Receivership Order allows the Receiver to retain professionals to assist the Receiver in carrying out his duties and responsibilities. Receivership Order at ¶57. Engagement of professionals by the Receiver must be approved by the Court. *Id.* On December 1 and 3, 2022, the Court entered orders authorizing the Receiver to employ SHB as legal counsel (Doc. No. 38) and Hays, as financial consultants and accountants (Doc. No. 37). SHB began working on this matter on September 29, 2022. Hays began working on this matter on September 30, 2022. The Court entered orders authorizing the Receiver to employ Pugh Accardo as Louisiana counsel on November 10, 2022 (Doc. No. 29), and BlockTrace Inc. as cryptocurrency consultants on January 5, 2023 (Doc. No. 43).

22. The Receivership Order further provides that the Receiver and Retained Personnel shall apply to the Court for compensation and expense reimbursement from the Receivership Estates, and that prior to filing the fee application with all exhibits and relevant billing information must be provided to SEC counsel. Receivership Order at ¶58. The Order also provides that the fee applications of the Receiver and Retained Personnel may be subject to a holdback in the amount of 20% of the amount of fees and expenses for each application filed with the Court. *Id.* ¶ 60.

23. The hours worked, hourly billing rate, and total fees of the Receiver are listed in **Exhibit A**. The flat hourly billing rate of the Receiver is \$525.00.

24. The names, hours worked, hourly billing rates, and total fees of all SHB professionals who have billed time to this matter are listed in **Exhibit B**. The flat hourly rate of each SHB attorney working on this matter is \$425.00. The flat hourly rate of SHB timekeepers who are not attorneys is their standard rate.

25. The total actual fees and expenses incurred for the Application Period are summarized as follows:

Receiver- Fees for Application Period

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
88.90	<i>See Ex. A</i>	\$46,672.50	\$0	\$46,672.50

Receiver's Counsel, Shook, Hardy & Bacon L.L.P. – Fees and Expenses for Application Period

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
797	<i>See Ex. B</i>	\$323,534.50	\$23,294.14	\$346,828.64

26. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$346,828.64 for the Application Period. The Receiver asks the Court to approve payments to the Receiver, on an interim basis in the amount of \$46,672.50 for the Application Period.

27. In accordance with the Billing Instructions, the Receiver and his advisors have separately categorized their services by task. The following table summarizes the respective number of hours incurred relative to each task category during the Application Period:

Receiver John Lewis, Jr.

Task Description	Hours Worked	Total Fees
Asset Analysis	4.20	\$2,205.00
Business Analysis	4.0	\$2,100.00
Case Administration	43.20	\$20,055.00
Status Reports	6.40	\$3,360.00
Litigation	76.80	\$37,695.00
Claims Administration	3.70	\$1,942.50
Litigation Consulting	1.30	\$682.50

Receiver's Counsel, Shook, Hardy & Bacon L.L.P.

Task Description	Hours Worked	Total Fees
Asset Analysis	23.40	\$9,945.00
Asset Disposition	8.20	\$3,485.00
Business Analysis	1.40	\$350.00
Data Analysis	5.10	\$918.00
Case Administration	247.60	\$96,292.00
Valuation	2.0	\$360.00
Status Reports	3.70	\$1,033.50
Litigation	106.60	\$40,751.00
Claims Administration	1.50	\$637.50
Litigation Consulting	8.10	\$3,442.50
Forensic Accounting	1.5	\$637.50

ARGUMENT AND AUTHORITES IN SUPPORT OF APPLICATION

28. In support of this application for allowance of compensation and reimbursement of expenses, the Receiver and his advisors respectfully direct this Court's attention to those factors generally considered by Courts in awarding compensation to professionals for services performed in connection with the administration of a receivership estate. As stated by the Sixth Circuit Court of Appeals in *Reed v. Rhodes*, 179 F.3d 453, 471 (6th Cir. 1999), "the primary concern in an attorney's fee case is that the fees awarded be reasonable." A reasonable fee is "one that is adequate to attract competent counsel. . ." See *Blum v. Stenson*, 465 U.S. 886, 893-94 (1984). (internal citation omitted). Under the twelve factor test enunciated by the Fifth Circuit in *Johnson v. Georgia Hwy. Express, Inc.*, 488 F.2d 714, 717 (5th Cir. 1974), and adopted by the Supreme Court in *Hensley v. Eckerhart*, 461 U.S. 424, 432 (1983), a court must first determine the loadstar amount by multiplying the reasonable number of hours billed by a reasonable billing rate. *Johnson*, 488 F.2d at 717. That amount can then be adjusted by the "Johnson Factors."

29. The compensation requested is allowable pursuant to the twelve-factor test (the “Johnson Factors”) set forth in *Johnson*, 488 F.2d at 717-19. The Johnson Factors and their applicability in this case are as follows:

30. Time and Labor Required: The Receiver and his advisors expended the hours detailed in the attached exhibits in performing Services during the Application Period. In support of this application, the Receiver submits the following exhibits for the Court’s review.

- Exhibit A demonstrates professional fees (including (i) the date the services were rendered, (ii) the nature of the services rendered, (iii) the time required for the performance of such services, and (iv) the fees charged for each service rendered and expenses of the Receiver in connection with the administration of the Receivership;
- Exhibit B demonstrates professional fees (including (i) the date the services were rendered, (ii) the nature of the services rendered, (iii) the time required for the performance of such services, and (iv) the fees charged for each service rendered and expenses of SHB in connection with the administration of the Receivership;
- **Exhibit E** - Certification of John Lewis, Jr. stating the reasonableness of the rates charged and hours billed by professionals at SHB.

a. Novelty and Difficulty of Questions Presented: The Services performed involved issues of varying complexity, as set forth in substantial detail in the billing statements attached to this Application.

b. Skill Requisite to Perform Professional Services: The Receiver and his professional team possess substantial expertise and experience in bankruptcy, receiverships, litigation, and related fields and are well-qualified to perform the professional Services.

c. Preclusion of Other Employment Due to Acceptance of the Cases: The Receiver and his team devoted time and resources to this case to the possible preclusion of involvement in other matters.

d. Customary Fees for the Type of Services Rendered: SHB have charged fees that are at or below the standard billing rates for the professionals working on this matter, and those fees are at or below customary fees charged by like professionals in their respective markets. SHB's flat rate of \$425.00 per hour is a significant discount to the normal billing rate of \$600.00-\$730.00 per hour for the attorneys working on this matter.

e. In addition, the Receiver's professional fees listed above have been reduced by \$10,185.00. And, SHB's fees have been reduced by \$59,636.00. SHB's expenses \$47,650.28 are billed with no mark-up added.

f. Whether the Fee is Fixed or Contingent: The requested fees are subject to Court approval and are primarily based upon hourly rates without any fixed or flat fees. *See also* Order setting all counsel rates in this case at \$425/hr. (Doc. No. 67). Compensation is "contingent" only in the sense that there are risks of non-allowance or non-payment.

g. Time Limitations Imposed by the Client or Other Circumstances: The time requirements during the period covered by this application have been substantial. The tasks performed by the Receiver and his team include investigating, locating, taking possession, and liquidating Defendants' assets; responding to investors; analyzing new information learned from the ongoing investigation; monitoring and updating the Receiver's website; analyzing company documents, documents produced by witnesses at depositions or interviews, and documents produced by third parties in response to subpoenas; responding to investor questions and concerns; motion practice; and reporting information as necessary to the Court.

h. The Amount Involved and Results Obtained: Furthermore, the Receiver and his advisors have performed tasks that have added value to the Receivership by locating, taking

possession of, and liquidating Receivership assets. The Receiver and his advisors have taken actions during the Application Period including, but not limited to, the following:

- a. Maintaining a Receiver Website (cryptofxreceiver.com), email address (receivership@shb.com), and phone number (713-546-5614) so that investors can receive information pertaining to the receivership in both English and Spanish.
- b. Communicating with investors by phone and email;
- c. Conducting interviews of investors;
- d. Conducting interviews of additional sales agents;
- e. Identifying and securing receivership assets;
- f. Maintaining cryptocurrency wallets and/or accounts containing Bitcoin cryptocurrency;
- g. Coordinating valuation and sale of Receivership personal property;
- h. Corresponding with third parties to identify potential receivership assets;
- i. Analyzing emails, text messages, and other records to evaluate Receivership Defendant assets;
- j. Preparing charts showing amount of assets received by CryptoFX;
- k. Preparing of paper and electronic records for a detailed forensic analysis;
- l. Reviewing CryptoFX and CBT business records obtained from investors or in response to third-party subpoenas;
- m. Serving subpoenas to third parties for the collection of documents and information to financial institutions, crypto currency platforms, professionals retained by the Defendants, and other fact witnesses in order to locate additional assets;
- n. Analyzing company records to evaluate potential claims against third parties;
- o. Managing a Relativity database in order to store and review company documents.
- p. Conducting public records searches and related due diligence to affiliated parties, entities, and other potential relief defendants;

- q. Preparing the Receiver's Third Interim Status Report;
 - r. Working with Dimas Realty team to prepare the Mack Washington Property for sale.
 - s. Reviewing records received from third parties to perform asset tracing analysis;
 - t. Working with real estate broker and real estate appraisers to evaluate and liquidate real property;
 - u. Working with Webster's Auction Palace to appraise and evaluate the value of personal property.
- i. The Experience, Reputation, and Ability of the Professional: The Receiver and his team have extensive experience in receivership, bankruptcy, and litigation matters.
- j. Undesirability of the Case: This factor is inapplicable to the present case.
- k. Nature and Length of Professional Relationship with the Client: SHB has worked with the Receiver prior to being retained in these proceedings and maintains an ongoing relationship.
- l. Awards in Similar Cases: The Receiver and the professionals of the Receiver are regularly awarded compensation in receivership cases on the same basis as requested herein.

31. Each of these tasks detailed in the Receiver's Third Interim Fee Application was reasonably necessary to secure assets of the Receivership and to evaluate potential sources of other assets. Further, each task was performed efficiently by the Receiver or his advisors at SHB and Hays.

CONFERRAL WITH THE SEC

32. The Receiver and counsel for the SEC have conferred regarding the Receiver's SCIFA and its compliance with the SEC's Billing Guidelines and this Court's Receivership Order, and the reasonableness of the costs and expenses incurred in the ordinary course of the administration and operation of the Receivership.

33. The SEC does not oppose the Receiver's request for an order approving and authorizing, on an interim basis, the payment of fees and expenses as follows:

- (a) That the Receiver be conditionally awarded fees incurred during the Third Interim Fee Application in the amount of \$37,695.00;
- (b) That the Receiver's Retained Professionals be awarded fees incurred during the Third Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$157,852.00;
- (c) That the out-of-pocket costs and expenses incurred by the Receiver in the ordinary course of the administration and operation of the Receivership, as set out more fully in this TCIFA in the aggregate amount of \$47,650.38, are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

CONCLUSION

34. Based on the foregoing, the Receiver respectfully requests that the Court enter an order approving the Receiver's Third Certified Interim Fee Application for the Receiver and His Counsel and authorizing the Receiver to immediately pay the fees requested in the TCIFA as follows: (1) to the Receiver in the amount of \$37,695.00; and (2) Shook Hardy & Bacon, LLC for \$157,852.00.

35. The Receiver further asks that the Court find and determine that the costs and expenses incurred by the Receiver in the ordinary course of the administration and operation of the Receivership, as set out more fully in this Application, were reasonable and necessary and that they be approved for immediate reimbursement by the Receiver in the aggregate amount of \$47,650.38.

Dated: August 17, 2023

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Poston E. Pritchett

Poston E. Pritchett
Texas Bar No. 24088258
2555 Grand Blvd.
Kansas City, MO 64108
Telephone: 816.474-6550
Facsimile: 816.421.5547
ppritchett@shb.com

Caroline M. Gieser
(admitted *pro hac vice*)
SHOOK, HARDY & BACON L.L.P.
1230 Peachtree Street, NE, Suite 1200
Atlanta, GA 30309
Telephone: 470.867.6000
mcgieser@shb.com

Counsel for John Lewis, Jr.
Court-Appointed Receiver

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he has conferred with counsel for Plaintiff US Securities and Exchange Commission, and the SEC does not oppose this Application and supports granting the relief requested herein.

/s/ Poston E. Pritchett

Poston E. Pritchett

CERTIFICATE OF SERVICE

I hereby certify that on this the 17th day of August, 2023, the above and foregoing document was filed electronically through the CM/ECF system, which sent notification of such filing to all known counsel of record.

Matthew J. Gulde
UNITED STATES SECURITIES
AND EXCHANGE COMMISSION
Burnett Plaza, Suite 1900
801 Cherry Street, Unit 18
Fort Worth, TX 76102
Telephone: 817.978.1410
Facsimile: 817.978.4927
guldem@sec.gov

***Counsel for Plaintiff
U.S. Securities and Exchange Commission***

Paul D. Flack
PRATT & FLACK, LLP
4306 Yoakum Blvd., Suite 500
Houston, TX 77006
Telephone: 713.705.3087
pflack@prattflack.com

Counsel for Defendant Mauricio Chavez

Dan L. Cogdell
COGDELL LAW FIRM, PLLC
1000 Main Street, Suite 2300
Houston, TX 77002
Telephone: 713.437.1869
Facsimile: 713.437.1810
dan@cogdell-law.com

Counsel for Defendant Giorgio Benvenuto

/s/ Poston E. Pritchett

Poston E. Pritchett

Exhibit A



Shook, Hardy & Bacon L.L.P.

2555 Grand Boulevard
Kansas City, MO 64108-2613
(816) 474-6550

JOHN LEWIS JR.
RECEIVER
600 TRAVIS ST., SUITE 3400
HOUSTON, TX 77002-2926

Invoice No: 3021399
Invoice Date: 08/09/2023
Matter Number: 33206.393697
Billing Attorney: John Lewis Jr.

Summary of Invoice

For Professional services and disbursements thru **July 31, 2023**

SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice

Current Fees \$37,695.00

Total Amount Due \$37,695.00

REMITTANCE INFORMATION

Please verify your records reflect our new Wiring Instructions and Remit Address.

Wiring Instructions

Commerce Bank
1000 Walnut
Kansas City, MO 64106
ABA Number: 101000019
SWIFT: CBKCUS44
Account Number: 43056

Remit Address

Shook, Hardy & Bacon L.L.P.
PO Box 843718
Kansas City, MO 64184-3718

Federal Tax ID:

44-0585497

Payments received after July 31, 2023 may not be reflected herein.



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Invoice Detail

For Professional services and disbursements thru *July 31, 2023*

SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice

Professional Services

Date	Attorney	Description	Hours	Amount
SEC01 Asset Analysis				
04/03/23	JLJ	Strategize with team on BSA issues, pending real estate closings, expansion of receivership, privilege issues related to inbound subpoena response and demand for fees.	1.80	\$945.00
05/24/23	JLJ	Skim Mezomo and Munoz interview summary. Analysis of range of next steps with cooperating witnesses.	0.90	472.50
06/02/23	JLJ	Exchanges regarding counter offer from Waller Country tract. Attention to transfer documents following broker sale of Mercedes.	0.80	420.00
06/20/23	JLJ	Consideration of counter offer on Mack Washington property and contingencies thereto.	0.70	367.50
Subtotal for SEC01 Asset Analysis			4.20	\$2,205.00
SEC04 Case Admin				
05/01/23	JLJ	Strategize and provide guidance to team on various pending matters.	0.80	\$420.00
05/03/23	JLJ	Skim cooperating witness interview notes and key documents provided (1.8); Review and follow up questions on Waller County land sale (1.0)	2.80	1,470.00
05/10/23	JLJ	Skim documents produced by Reyes. Careful review of fee application and supporting drafts. Approval of same	0.80	420.00
05/22/23	JLJ	Review of workstream with team including ongoing efforts to access Google Docs for leader profits information, preparation for call with SEC staff and assets sales of Waller property and vehicles. Turns of emails regarding same.	2.60	1,365.00
06/05/23	JLJ	Strategize team on various workstreams including targeted net winners analysis, money order/BSA claims, rescoping options for Blockchain work.	1.50	787.50
06/06/23	JLJ	Detailed review of case administration and outstanding matters with ST and collaboration on 90 day work plan.	2.20	1,155.00
06/08/23	JLJ	NO CHARGE - Review of status of various workstream in preparation for ST hand off and P. Poston onboarding. Skim prior filings and materials.	5.00	No Charge
06/09/23	JLJ	Call with S. Themeli and P. Pritchett regarding	1.20	630.00



33206.393697 3021399 08/09/2023

		litigation strategy.		
06/12/23	JLJ	Review 90 day action plan with team regarding expansion, turnover issues, ongoing fraud efforts, expenses and Blocktrace scope of work.	1.50	787.50
06/13/23	JLJ	Call with M. Gulde regarding crypto, staffing and case administration.	1.20	630.00
06/14/23	JLJ	Detailed review of draft Blocktrace report. Edits to same.	6.00	3,150.00
06/15/23	JLJ	Prepare for and participate in briefing with M. Gulde and J. Harris on cryptocurrency efforts and presentation from J. Daniels from Blocktrace. Action items following briefing.	2.10	1,102.50
06/16/23	JLJ	Attention to checks deposit from sale of Mercedes	0.80	420.00
06/20/23	JLJ	Analysis of open issues and workstreams with team including evaluating potential relief defendants, ongoing review of draft Blocktrace report, discussion of potential interview NJ leaders. Attention to tracking and status of outstanding subpoenas and demand letters.	1.50	787.50
06/21/23	JLJ	Detailed review of open workstreams following S.Themeli departure.	4.00	2,100.00
06/22/23	JLJ	Deep dive into preliminary Blocktrace preliminary report and recommendation on identification, accessing and valuing over 6800 crypto accounts transactions to develop a cost effective strategy for marshalling and liquidating.	3.00	1,575.00
06/26/23	JLJ	Detailed review of Blocktrace fee application draft.	1.50	787.50
06/26/23	JLJ	Detailed strategy update on ongoing work including Taffinder demand, tracking and updates on 20 + outstanding subpoenas and demand letters to leaders, family members and potential relief defendants, consideration of scope of Blocktrace work, analysis of moneygram cases and theories of liability and damages.	3.20	1,680.00
06/27/23	JLJ	Additional edits to draft interim report.	1.50	787.50
Subtotal for SEC04		Case Admin	43.20	\$20,055.00

SEC05 Claims Admin

05/12/23	JLJ	Skim and approve Benvenuto analysis for forward to SEC.	0.80	\$420.00
05/15/23	JLJ	Strategize with team on open issues including sale negotiations regarding Waller property, Blocktrace ongoing work and billing and brief on document production and billing issues.	1.80	945.00
05/16/23	JLJ	Skim Montoya documents and interaction with Benvenuto Holdings in relation as part of analysis of basis for seeking expansion of receivership relief defendants.	1.10	577.50
Subtotal for SEC05		Claims Admin	3.70	\$1,942.50



33206.393697 3021399 08/09/2023

SEC08 Business Analysis

05/31/23	JLJ	Continue to digest the Blockchain draft report. Debrief from call with J. Harris on information exchanges. Direct team on next steps.	1.50	\$787.50
06/13/23	JLJ	Review and comments to draft interim report on crypto research and recovery efforts.	2.50	1,312.50
Subtotal for SEC08 Business Analysis			4.00	\$2,100.00

SEC11 Status Reports

04/17/23	JLJ	Strategizing team regarding content, secondary source reports and evidence gathered for upcoming court mandated status report.	1.80	\$945.00
06/28/23	JLJ	Skim past interim reports for inputs into current draft. Review cash flows and form 2's for banking activity.	2.20	1,155.00
06/29/23	JLJ	Continued revisions to upcoming interim report including preliminary findings by Block trace and description of proposed work going forward.	1.30	682.50
06/30/23	JLJ	Continued attention to drafting of interim report and consideration of proposed Block trace workplan.	1.10	577.50
Subtotal for SEC11 Status Reports			6.40	\$3,360.00

SEC12 Litigation Consulting

04/04/23	JLJ	Lengthy call with B. Abernathy and J. Posma regarding potential regulatory and audit matters.	1.30	\$682.50
Subtotal for SEC12 Litigation Consulting			1.30	\$682.50

SEC13 Litigation

04/05/23	JLJ	Inputs to Motion to Compel draft. Follow questions on Blocktrace report requested compensation.	1.80	\$945.00
04/10/23	JLJ	Skim notes from Torres interview (.8); attention to Wildlife Management contract for Waller county tract (.7)	1.50	787.50
04/18/23	JLJ	Skim, offer edits to Motion to Compel draft	1.50	787.50
05/15/23	JLJ	Attention to turns of response to motion to compel, authorize new lis pendens actions based on newly discovered operations, exchanges with interested parties.	1.70	892.50
05/17/23	JLJ	Review and comments to Reply brief to Motion to Compel Chavez.	0.80	420.00
05/23/23	JLJ	Turns of Reply to Motion to Compel Chavez. Skim Blockchain work and draft summary of report status.	2.50	1,312.50
06/12/23	JLJ	Detailed status of turnover demands (Vargas and Gonzales), procedural aspects of prospective fraudulent transfer claims, consideration of pending motion to compel on expanding receivership. Skim interview notes from 15+ interviews.	2.50	1,312.50
06/23/23	JLJ	Detailed review of research (factual and legal) on	1.70	892.50



33206.393697 3021399 08/09/2023

PLS potential cause of action.

Subtotal for SEC13	Litigation	14.00	\$7,350.00
Total		76.80	\$37,695.00

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	71.80	\$525.00	\$37,695.00
Total Fees		71.80		\$37,695.00

Total Amount Due	\$37,695.00
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Exhibit B



Shook, Hardy & Bacon L.L.P.

2555 Grand Boulevard
Kansas City, MO 64108-2613
(816) 474-6550

SHOOK HARDY AND BACON
JOHN LEWIS, JR, RECEIVER
600 TRAVIS ST, SUITE 3400
HOUSTON, TX 77002-2926

Invoice No: 3021400
Invoice Date: 08/09/2023
Matter Number: 33206.389768
Billing Attorney: John Lewis Jr.

Summary of Invoice

For Professional services and disbursements thru **July 31, 2023**

Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.

Current Fees	\$157,852.00
Current Disbursements	47,650.38
Total Amount Due	<hr/> \$205,502.38

REMITTANCE INFORMATION

Please verify your records reflect our new Wiring Instructions and Remit Address.

Wiring Instructions

Commerce Bank
1000 Walnut
Kansas City, MO 64106
ABA Number: 101000019
SWIFT: CBKCUS44
Account Number: 43056

Remit Address

Shook, Hardy & Bacon L.L.P.
PO Box 843718
Kansas City, MO 64184-3718

Federal Tax ID:

44-0585497

Payments received after July 31, 2023 may not be reflected herein.



33206.389768 3021400 08/09/2023

Invoice Detail

For Professional services and disbursements thru *July 31, 2023*

Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.

Professional Services

Date	Attorney	Description	Hours	Amount
SEC01 Asset Analysis				
04/03/23	STV	Review responses to subpoena and confer with the team and Blocktrace re investor payments in crypto currency	1.10	\$467.50
04/04/23	STV	Call with real estate broker re appraisal of the Waller county Clear creek property	0.20	85.00
04/04/23	STV	Review case documents re payments in crypto and email with relevant investors	0.80	340.00
04/04/23	KKP	Draft Taffinder turnover letter.	1.20	510.00
04/06/23	STV	Confer with Gulfstream and Blocktrace re nano ledger access	0.50	212.50
04/06/23	CMG	Draft interview questions for Gabriel Torres.	0.50	212.50
04/07/23	STV	Review real estate records on Fort Bend county properties, call with title company on same, and email with counsel for Chavez and J. Gonzalez re transfer of the properties	0.80	340.00
04/07/23	STV	Emails with Chavez's counsel and team re nano ledger	0.20	85.00
04/07/23	ALTZ	Communicate with Ms. Themeli regarding a Salesforce image.	0.10	42.50
04/07/23	CMG	Revise interview questions for interview with Gabriel Torres.	0.80	340.00
04/10/23	STV	Review email re BTC payments to Chicago leaders and confer with the team re same	0.20	85.00
04/13/23	STV	Call with real estate broker re inspection of Mack Washington property	0.30	127.50
04/14/23	ALTZ	Communicate with Mr. Askue and Ms. Themeli regarding Salesforce access.	0.10	42.50
04/14/23	ALTZ	Verify renewed full access to Salesforce.	0.20	85.00
04/17/23	STV	Review third party records, finalize lis pendens and coordinate recording	0.80	340.00
04/18/23	STV	Call with Blocktrace re CryptoFX cryptocurrency transactions	0.70	297.50
05/02/23	ALTZ	Analyze Salesforce data to determine information regarding a CFX email account.	0.20	85.00
05/02/23	ALTZ	Communicate with Ms. Themeli regarding CFX email access.	0.10	42.50
05/04/23	STV	Emails with real estate broker re Clear creek property appraisal and listing	0.20	85.00
05/05/23	STV	Call with real estate broker re market analysis and	1.40	595.00



33206.389768 3021400 08/09/2023

		listing of the property and review appraisals of Creak creek property		
05/05/23	STV	Confer with team analysis of defendants bank and other financial records	0.20	85.00
05/09/23	STV	Review market analysis on Clear Creek and confer with the Receiver team re listing of the property	0.60	255.00
05/19/23	STV	Call with BlockTrace regarding report and confer with the team re same	0.80	340.00
05/24/23	STV	Review emails with Blocktrace and revise status report on crypto currency tracing	1.10	467.50
05/26/23	ALTZ	Communicate with Ms. Themeli and Mr. Percy regarding producing copies of SalesForce.	0.10	42.50
05/26/23	ALTZ	Communicate with Mr. Percy regarding options for producing copies of the SalesForce data.	0.10	42.50
05/30/23	ALTZ	Communicate with Mr. Percy regarding additional options for producing copies of SalesForce.	0.10	42.50
06/05/23	STV	Review email re crypto wallets and confer with the team re Blocktrace analysis of additional accounts	0.50	212.50
06/06/23	ALTZ	Communicate with Ms. Themeli regarding the SalesForce data set.	0.10	42.50
06/06/23	STV	Confer with the team re receivership asset valuation and liquidation	0.20	85.00
06/07/23	ALTZ	Communicate with Mr. Percy regarding directions for alternative data transfer.	0.10	42.50
06/07/23	ALTZ	Communicate with Ms. Themili regarding issues with data transfer.	0.10	42.50
06/07/23	ALTZ	Communicate with Ms. Harris regarding issues with data transfer.	0.10	42.50
06/07/23	ALTZ	Resolve issues with data transfer.	2.20	935.00
06/08/23	ALTZ	Telephone conference with Mr. Percy regarding the data transfer details and issues.	0.20	85.00
06/08/23	ALTZ	Communicate with Mr. Percy regarding directions for data transfer.	0.10	42.50
06/09/23	STV	Call with S. Askue re Vargas demand for turn over of Receivership assets	0.50	212.50
06/12/23	CMG	Attend team strategy meeting to determine additional assets to pursue.	0.50	212.50
06/14/23	STV	Review personal property in the possession of the Receiver and coordinate value analysis	0.90	382.50
06/15/23	ALTZ	Communicate with Ms. Themeli regarding the SalesForce data.	0.10	42.50
06/20/23	CMG	Attend team strategy call to determine what assets to pursue next given cost to pursue them and value of the asset.	0.50	212.50
06/22/23	PEP	Analyze issues related to title for Mack Washington project.	0.20	85.00
06/22/23	PEP	Review most recent asset analysis from S. Askue for purposes of considering litigation strategy.	0.20	85.00
06/22/23	CMG	Evaluate possible avenues to seek recovery from PLS.	1.20	510.00
06/23/23	PEP	Review assets lined up for disposition by auction.	0.20	85.00
06/26/23	PEP	Attend to strategy for collecting and securing	0.20	85.00



33206.389768 3021400 08/09/2023

		computer, and subsequent analysis.		
06/26/23	PEP	Analyze outstanding items associated with Chavez's prior counsel.	0.20	85.00
06/26/23	PEP	Communicate with John Sklar regarding computers in Mr. Chavez's custody.	0.20	85.00
06/26/23	CMG	Attend team strategy call to determine what assets to pursue next given cost to pursue them and value of the asset.	0.70	297.50
06/27/23	PEP	Attention to Chavez's personal property and communications with his counsel regarding turnover of same.	0.40	170.00
06/28/23	PEP	Analyze communications from Webster's auctions to Chavez counsel regarding missing items.	0.20	85.00
06/29/23	PEP	Further attention to Mack Washington sale.	0.20	85.00
Subtotal for SEC01 Asset Analysis			23.40	\$9,945.00

SEC02 Asset Disposition

04/03/23	STV	Confer with K. Powell re motion for sale of personal property and additional supporting documents; emails with real estate broker and title company re sale of 28 Lawrence property	0.60	\$255.00
04/06/23	STV	Email with Coinbase re liquidation of additional account and Mike Poutous re sales of cars	0.20	85.00
04/07/23	STV	Call with real estate broker re appraisal of Mack Washington property and Fort Bend properties; email with car dealer re sale of automobiles	0.50	212.50
04/09/23	STV	Revise motion for sale of personal property and confer with K. Powell re same	0.50	212.50
04/10/23	KKP	Draft receiver's motion to sell vehicles.	0.50	212.50
04/10/23	KKP	Confer w/ S. Themeli and M. Poutous regarding title to vehicles and outstanding liens.	0.20	85.00
04/17/23	KKP	Assist with closing documents for 28 Lawrence Marshall.	0.20	85.00
04/17/23	KKP	Confer with M. Poutous regarding sell of vehicles and court order.	0.10	42.50
04/20/23	KKP	Email M. Poutous regarding title for Mercedes vehicle.	0.10	42.50
05/01/23	STV	Email with M. Poutous re sale of BMW	0.20	85.00
05/04/23	STV	Emails and call with M. Poutous re sale of VW and BMW and titles; confer with the Receiver re same	0.80	340.00
05/08/23	STV	Confer with team re sale of VW and check	0.20	85.00
05/12/23	STV	Review spreadsheet of Chavez's personal property requested by Receiver to be turned over and confer with P. Flack re same	0.30	127.50
05/12/23	STV	Emails with real estate broker re listing agreement for Clear Creek property	0.20	85.00
05/15/23	STV	Emails with P. Flack and Billy Webster re Chavez's personal property turnover and sale	0.30	127.50
05/16/23	STV	Review listing agreement for Clear Creek property and confer with real estate agent and Receiver re same	0.40	170.00



33206.389768 3021400 08/09/2023

05/17/23	STV	Coordinate review of additional personal property to be liquidated by Webster	0.40	170.00
05/17/23	STV	Emails and call with Kelsey Morris, real estate agent	0.30	127.50
05/17/23	STV	Prepare letter to Webster's re sale of personal property	0.20	85.00
05/17/23	STV	Review email by prospective buyer of BMW and respond to same; email with Poutous re lien	0.20	85.00
05/18/23	STV	Email with M. Poutous re inspection of BMW	0.10	42.50
05/23/23	STV	Call with Mike Poutous and emails with the team re pay off and sale of BMW and sale of Mercedes	0.30	127.50
05/24/23	STV	Review list of Chavez personal property to be liquidated and confer with Webster and P. Flack re same	0.30	127.50
06/05/23	STV	Email with Mike Poutous re clear title on BMW and sales of the vehicles	0.10	42.50
06/13/23	STV	Follow up with real estate broker, Websters and Michael Poutous re sale of real estate and sale of Receivership personal property	0.40	170.00
06/23/23	PEP	Confer with B. Webster regarding items needed for auction.	0.20	85.00
06/23/23	PEP	Various communication with real estate team regarding potential sale of Mack Washington property.	0.40	170.00
Subtotal for SEC02 Asset Disposition			8.20	\$3,485.00

SEC04 Case Admin

04/03/23	STV	Email with NY and Connecticut counsel re filing of the notice of receivership and coordinate service.	0.40	\$170.00
04/03/23	KKP	No bill--draft fee app.	3.00	No Charge
04/03/23	KKP	Internal team call with G. Hayes, J. Lewis, S. Themeli, C. Geiser regarding upcoming deadlines and outstanding tasks.	0.90	382.50
04/03/23	STV	Review invoice by Rapp&Krock and confer with the Receiver and team re same; confer with team re additional calls from investors	0.60	255.00
04/03/23	STV	Review documents to be produced in response to Chavez request for documents; confer with A. Tanner re Salesforce accounts	1.50	637.50
04/03/23	CMG	Attend weekly team call to determine outstanding action items for this week.	0.90	382.50
04/04/23	KKP	No bill-draft fee application.	3.00	No Charge
04/05/23	KKP	No bill-draft fee app.	3.00	No Charge
04/05/23	STV	Review defendants' bank records and confer with the team re same; confer with e-discovery team re CFX devices and status of collection; confer with the team re crypto currency investments and coordinate follow up with investors; follow up with counsel for IS re document requests; confer with the team documents requested by title company on 28 Lawrence; coordinate additional case management tasks	3.80	1,615.00



33206.389768 3021400 08/09/2023

04/06/23	STV	Review emails with investors and respond to same	0.20	85.00
04/09/23	STV	Coordinate review of investor information and confer with Illinois secretary of state	0.30	127.50
04/10/23	STV	Review Flack invoices and follow up re payment; coordinate payment of GB.	0.40	170.00
04/10/23	STV	Call with Plateau Wild Life Management re valuation application for Mack Washington property and related tasks, review application and affidavit and coordinate execution	0.60	255.00
04/10/23	STV	Review investor information and email with II SOS re same	0.20	85.00
04/11/23	STV	Call with real estate broker re Mack Washington property; review Wild Life Management tasks and confer with the Receiver re same.	0.80	340.00
04/11/23	STV	Analysis of company documents and supplement and revise motion to compel	2.50	1,062.50
04/12/23	STV	Emails with counsel for CFX leaders; confer with the Receiver re agreement with Plateau and other Receivership administration issues; coordinate research on additional CFX leaders; prepare D&C letter	1.70	722.50
04/14/23	STV	Call with G. Hays re crypto transactions, subpoenas and report; review deposition testimony and analysis of claims against third parties; review transaction information from CFX leader; confer with Plateau Wild Life management re Receiver's affidavit	1.20	510.00
04/14/23	STV	Confer with the team re subpoena responses from crypto currency platforms	0.30	127.50
04/17/23	STV	Revise subpoenas and demand letters to leaders; review case documents; call and email with Chicago leaders; review closing documents for the sale of Waller county property; email with counsel for A.M. CFX employee re depositions scheduling; review email from Chavez's counsel re request for turn over of personal property.	1.10	467.50
04/17/23	STV	Prepare for and attend strategy call with the receiver and the team	0.50	212.50
04/17/23	STV	Review case documents to investigate claims against third parties	0.80	340.00
04/18/23	STV	Analysis of deposition testimony and company records in preparation for supplementation of motion to compel and Ponzi report	2.20	935.00
04/18/23	STV	Email correspondence with counsel for CFX employees, call with Webster re sale of personal property; coordinate review of inventory; emails with title company re closing of sale;	0.50	212.50
04/19/23	STV	Call with counsel CA CFX leaders	0.20	85.00
04/21/23	STV	Revise and supplement Motion to compel and affidavit in support thereof	1.50	637.50
04/22/23	STV	NO BILL Review SEC billing guidelines and revise Fee application	2.20	No Charge
04/24/23	STV	Review final application re property valuation by	0.50	212.50



33206.389768 3021400 08/09/2023

		Plateau Wild Life management and confer with Shane Davis re same		
04/24/23	STV	Review email and chart on cryptocurrency transactions prepared by Blocktrace and coordinate preparation of additional subpoenas.	1.30	552.50
04/25/23	STV	Confer with team re Chavez's request to modify order; call with counsel for SEC; review Wild Management plan and finalize same; confer with Plateau to filing of the plan; call with e-discovery team re document collection; emails with M. Poutous re sales of BMW; call and email with Santander Bank re note on BMW; call with American express re response to subpoena	2.50	1,062.50
04/25/23	STV	NO BILL - Revise pro formas in preparation for drafting fee application	2.90	No Charge
04/26/23	STV	NO BILL - Revise pro formas in preparation for fee application	0.30	No Charge
04/26/23	STV	Review case documents, supplement receiver's third report, confer with Pugh Accardo regarding their invoice; confer with the team re updates on Receiver website and investor tracking; revise subpoenas to cryptocurrency platforms; call with Greg Hays re Receiver's third interim report	2.50	1,062.50
04/26/23	STV	Review documents produced by Rapp & Krock, privilege log, and invoice and confer with the Receiver and Rapp & Krock them re same	0.80	340.00
04/27/23	STV	Research SwitChain cryptocurrency exchange and confer with Hays group and Blocktrace transactions on subpoena to the same	0.70	297.50
04/28/23	STV	Coordinate update to Receiver's website; email with SwitChain crypto exchange re subpoena requesting documents; prepare exhibits to third report	0.40	170.00
04/30/23	STV	Review and revise analysis of report by Blocktrace re tracing of cryptocurrency transactions	0.50	212.50
05/01/23	STV	Prepare for and meet with the Receiver and Hays team re upcoming deadlines and case tasks, discuss case strategy	1.20	510.00
05/01/23	STV	Emails with counsel for Colony Ridge Land; coordinate research on additional CFX leader (J. Torres) and preparation of demand letter; analysis of company documents in preparation for interview with CFX employees AM and OM; review email from investors	2.10	892.50
05/04/23	STV	Confer with the team re new tasks and upcoming deadlines	0.80	340.00
05/04/23	STV	No BILL -- revise and supplement Receiver's fee application	5.90	No Charge
05/05/23	CAU	Discuss interview strategy with supervisor for a future interview with ER; draft correspondence for ER in foreign language; send correspondence to ER.	0.50	212.50
05/05/23	STV	Email with Louisiana investor	0.10	42.50



33206.389768 3021400 08/09/2023

05/05/23	STV	Call and emails with e-discovery team documents and Relativity	0.30	127.50
05/05/23	STV	Emails with counsel for Connecticut investors	0.20	85.00
05/05/23	STV	Review email from immigration group and coordinate preparation of additional demand and cease and desist letters	0.30	127.50
05/05/23	STV	Review email and wire transfer from CFX Boston investor	0.20	85.00
05/08/23	STV	Confer with the team re following up on demand letters	0.20	85.00
05/08/23	LJG	Research to obtain background report on individual for Mia Fleming.	0.10	18.00
05/09/23	STV	Emails with counsel for CFX leader SR.	0.20	85.00
05/10/23	YKR	Draft summary and analysis of the information recorded on CFX leaders' spreadsheets based on a review of the recorded interview of Ana Munoz.	2.10	892.50
05/10/23	YKR	Review and analyze interview of Ana Munoz and draft a summary of the interview based on such review.	2.20	935.00
05/10/23	YKR	Draft summary and analysis of the operations of the CFX office at Blalock based on a review of the interview of Ana Munoz.	2.00	850.00
05/11/23	CAU	Discuss interview strategy with supervisor for a future interview with SV; correspond with SV regarding interview tomorrow; correspond with EG regarding a future interview.	1.00	425.00
05/11/23	STV	Coordinate analysis of interview with CFX employee with Y. Rashad; coordinate interviews with CFX leaders; coordinate payment of invoices;	0.70	297.50
05/12/23	CAU	Prepare for and conduct interview with SV; draft and organize notes that were uploaded to file system; discuss interview with Sonila T.	2.70	1,147.50
05/12/23	STV	Coordinate research on additional leaders; research on third party assets and lis pendens	0.40	170.00
05/12/23	STV	Prepare for interview with CFX leader SV and conduct interview	2.70	1,147.50
05/12/23	YKR	Draft summary and description of CFX leaders identified by Ana Munoz in her interview to include in interview summary.	1.90	807.50
05/12/23	YKR	Draft summary and description of CFX contacts identified by Ana Munoz in her interview to include in the interview summary.	2.60	1,105.00
05/12/23	YKR	Draft introduction and background section to include in the Ana Munoz interview summary.	1.90	807.50
05/12/23	YKR	Draft summary and analysis of the accounting department at CFX's office in Houston to include based on a review of the recorded interview of Ana Munoz.	3.20	1,360.00
05/15/23	STV	Prepare for and conduct weekly strategy call with the receiver and the team	1.00	425.00
05/15/23	YKR	Revise section in written summary of Ana Munoz's interview containing discussion and analysis of the	2.30	977.50



33206.389768 3021400 08/09/2023

		process of opening new investor contracts at CFX.		
05/15/23	YKR	Research procedural requirements for filing lis pendens in Illinois and draft summary of same.	0.90	382.50
05/15/23	YKR	Revise section in written summary of Ana Munoz's interview containing discussion and analysis of the process of calculating elite bonuses.	2.30	977.50
05/16/23	CAU	Attempt to contact investor through numerous communication means based updated contact information.	0.30	127.50
05/16/23	STV	Review email and investor documents including cashier's check made to Luxury Real estate from CFX investor and confer with the team re same	0.30	127.50
05/16/23	STV	Confer with the team re status call; email with M. Poutous re payoff of BMW; call with Chicago investor; emails with Flack and Webster re pick of personal property.	0.60	255.00
05/16/23	YKR	Revise analysis of CFX accounting operations in written summary of Ana Munoz's interview.	2.90	1,232.50
05/16/23	YKR	Review audio recording of Cindy Mezomo's interview to determine process for opening new contracts at the CFX office in Houston.	1.90	807.50
05/16/23	YKR	Review audio recorded interview of Cindy Mezomo to determine accounting operations at CFX.	2.20	935.00
05/17/23	CAU	Conduct interview with JA based on correspondence with JA; update internal records based on JA correspondence; discuss future strategy with supervisor in view of JA interview.	0.60	255.00
05/17/23	STV	Confer with the team re recording of additional emails from investors; confer with C. Udave re call with investor.	0.40	170.00
05/17/23	STV	Attention to payment of Salesforce invoice	0.10	42.50
05/17/23	YKR	Revise written summary of Ana Munoz interview to include banking and crypto wallet information for Ana and Olegario Munoz.	1.40	595.00
05/17/23	YKR	Draft summary and analysis of the accounting department at CFX's office in Houston based on a review of the Cindy Mezomo interview.	2.80	1,190.00
05/18/23	STV	Emails with counsel for Ana Munoz, confer with the team re CFX emails	0.30	127.50
05/19/23	STV	Call with Y. Rashad re analysis of interviews with leaders and CFX employees and other case management tasks with the team	0.60	255.00
05/19/23	YKR	Correspond with counsel for Ana Munoz and Olegario Munoz to schedule meeting in order to gain access to CFX Google drive containing leader spreadsheets and other company documents.	0.20	85.00
05/19/23	YKR	Draft summary and analysis of the operations of the CFX office in Chicago based on a review of the recorded interview of Ismael Sanchez.	2.40	1,020.00
05/19/23	YKR	Review audio recorded interview of Ismael Sanchez to determine the establishment of the CFX office in Chicago.	2.20	935.00



33206.389768 3021400 08/09/2023

05/22/23	CAU	Correspond with ER to schedule upcoming interview and answer preliminary questions; correspond with Sonila regarding strategy for interview.	0.40	170.00
05/22/23	STV	Call and email with Code Red security systems and confer with the team re CCTV system at Blalock, coordinate subpoena to the same	0.50	212.50
05/22/23	STV	Skim documents produced by CFX Leader	0.60	255.00
05/22/23	STV	Coordinate updates to Receiver's website	0.10	42.50
05/22/23	STV	Emails with the team and counsel for Chavez re Hair Salon lease agreement	0.20	85.00
05/22/23	STV	Coordinate with the e-discovery team re production of documents and CFX passwords	0.20	85.00
05/22/23	YKR	Review audio recorded interview of Cindy Mezomo and draft a summary and analysis of the CFX accounting operations identified in the interview.	3.00	1,275.00
05/22/23	YKR	Revise written summary of Cindy Mezomo interview to include individuals identified at the Blalock office at the time of closure.	2.20	935.00
05/22/23	YKR	Discuss strategy and status for motion to compel and prepare for upcoming call with the SEC with S. Themeli, J. Lewis, S. Askue.	1.00	425.00
05/23/23	CAU	Correspond with CB to schedule upcoming interview and answer preliminary questions; correspond with Sonila regarding strategy for interview.	0.40	170.00
05/23/23	STV	Review information on NJ CFX leader and coordinate demand letter	0.30	127.50
05/23/23	STV	Call and email with C. Bustamante, CFX leader in Atlanta and coordinate follow up call	0.30	127.50
05/23/23	STV	Coordinate update of case management charts; review analysis of calls with CFX employees and leaders prepared by Y. Rashad; revise demand letters and subpoenas	0.80	340.00
05/23/23	STV	Review email from FIEL group re CFX leaders	0.20	85.00
05/23/23	YKR	Draft summary and analysis of the process for opening new contracts for out of state leaders based on a review of the recorded interview of Ismael Sanchez.	2.20	935.00
05/23/23	YKR	Draft summary and analysis of the process for calculating elite bonuses for CFX leaders based on a review of the recorded interview of Ismael Sanchez.	1.70	722.50
05/23/23	YKR	Revise summary and analysis of CFX operations in Chicago based on a review of the recorded interview of Ismael Sanchez.	1.30	552.50
05/23/23	YKR	Draft summary and analysis of the relationship between the CFX office in Houston and the CFX office in Chicago based on a review of the recorded interview of Ismael Sanchez.	2.40	1,020.00
05/24/23	STV	Call with M. Fleming re updates to case management documents and additional document review	0.40	170.00
05/24/23	YKR	Revise written summary of Ismael Sanchez	0.60	255.00



33206.389768 3021400 08/09/2023

		interview per edits from S. Themeli.		
05/24/23	YKR	Draft summary and analysis of the income generated in CFX's Chicago office based on a review of the recorded interview of Ismael Sanchez.	1.90	807.50
05/24/23	YKR	Revise written summary of Ana Munoz's interview per additional edits from S. Themeli.	0.30	127.50
05/24/23	YKR	Draft summary and analysis of leader spreadsheets for out of state leaders at CFX based on a review of the recorded interview of Ismael Sanchez.	2.50	1,062.50
05/24/23	YKR	Correspond with M. Fleming to prepare subpoenas and demand letters to several CFX leaders.	0.70	297.50
05/24/23	YKR	Revise written summary of Cindy Mezomo interview per edits from S. Themeli.	0.70	297.50
05/25/23	STV	Skim documents produced by CFX leaders and prepare correspondence to counsel for OT and MS.	0.80	340.00
05/25/23	CAU	Correspond with Sonila and Yara regarding interview summaries for interviews with RZ, GC, SV, IS, SA, RT; review preliminary interview summary notes.	0.40	170.00
05/25/23	YKR	Attend call with SEC to discuss status of litigation and development of evidence.	1.10	467.50
05/26/23	STV	Confer with C. Udave re call with CFX employee, E. R.	0.30	127.50
05/26/23	STV	Prepare for and conduct call with CB and SM, CFX leaders, supplement summary of the call prepared by C. Udave and coordinate follow up requests for documents and updates to the leaders chart	1.20	510.00
05/26/23	STV	Skim documents produced by CFX leader S. R., follow up with counsel on same; update case management documents; confer with SEC counsel re case documents; call with the team re issuing additional deposition subpoenas and demand letters; review list of investors contacting Receiver	0.80	340.00
05/26/23	CAU	Attempt to reach out to ER via numerous methods to conduct interview at a time agreed to by ER; correspond with Sonila regarding interview summaries requested by SEC.	0.50	212.50
05/26/23	CAU	Correspond with Sonila and prepare for interview with CB; conduct detailed interview with CB and EA; memorialize and summarize notes from interview; internally distribute notes; draft and send detailed email in Spanish and English to CB, EA, and S based on correspondence with Sonila.	2.80	1,190.00
05/26/23	YKR	Correspond with S. Themeli and M. Fleming regarding status of subpoenas and demand letters to CFX leaders and responses to same.	0.50	212.50
05/27/23	CAU	Draft SEC report based on RZ interview.	1.50	637.50
05/30/23	CAU	Draft and finalize a preliminary draft of SEC report based on RT interview.	2.60	1,105.00
05/30/23	CAU	Draft and finalize a preliminary draft of SEC report based on RZ interview.	5.10	2,167.50
05/30/23	YKR	Correspond with L. Percy regarding production of	0.50	212.50



33206.389768 3021400 08/09/2023

		Salesforce data.		
05/30/23	YKR	Review and analyze master crypto address list in preparation for upcoming conference with the SEC.	0.60	255.00
05/30/23	LJG	Research to obtain background check on individual for Mia Fleming.	0.30	54.00
05/30/23	YKR	Correspond with counsel for Ana and Olegario Munoz regarding access to CFX Google drive and CFX issued cellphone and laptop.	0.30	127.50
05/31/23	CAU	Draft and finalize a preliminary draft of SEC report based on SA interview, as requested by SEC.	2.10	892.50
05/31/23	CAU	Per voice mails from RQ and ER, reach out to RQ and ER to set up time for a formal interview.	0.40	170.00
05/31/23	YKR	Draft emails to CFX leaders in New Jersey requesting interviews of same.	0.70	297.50
05/31/23	YKR	Meet with Ana Munoz and counsel to change the password to CFX Google drive account in order to gain access to CFX company documents.	0.60	255.00
06/01/23	CAU	Draft and finalize a preliminary draft of SEC report based on SV interview; correspond with Yara regarding finalizing all four SEC reports.	7.10	3,017.50
06/01/23	YKR	Review and analyze data collected from CFX Google drive.	2.00	850.00
06/01/23	YKR	Correspond with counsel for Ana Munoz and Olegario Munoz regarding CFX google accounts in order to gain access to CFX financial information and records.	0.40	170.00
06/01/23	YKR	Correspond with New Jersey investors requesting call to discuss CFX operations in New Jersey.	0.40	170.00
06/01/23	YKR	Revise summaries of interviews with CFX leaders to share with the SEC.	1.20	510.00
06/01/23	YKR	Meet with counsel for Ana and Olegario Munoz to gain access to CFX google accounts.	0.60	255.00
06/02/23	CAU	Per Sonila's request, correspond with RQ regarding involvement in CryptoFX; update internal records regarding RQ's information.	0.30	127.50
06/02/23	YKR	Draft subpoenas for the production of documents to various leaders at CFX who have provided no response to demand letters.	2.70	1,147.50
06/02/23	YKR	Draft demand letters to CFX leaders for production of documents and deposition testimony.	2.20	935.00
06/05/23	CAU	Further review and finalize SEC reports for RZ, SV, SA, RT based on Yara's review; submit SEC reports to Sonila for review; correspond with Sonila regarding future interviews.	0.80	340.00
06/05/23	STV	Revise and supplement analysis of interviews with CFX leaders	0.80	340.00
06/05/23	STV	Email with counsel for SEC re Salesforce data production	0.20	85.00
06/05/23	YKR	Revise demand letter to Juan Gomez requesting production of documents and deposition testimony.	1.90	807.50
06/05/23	YKR	Revise interview summary of Roberto Zavala per edits from S. Themeli.	1.30	552.50



33206.389768 3021400 08/09/2023

06/05/23	YKR	Discuss discovery of assets, status of asset collection, and financial tracing of crypto currency during call with J. Lewis, S. Themeli, and S. Askue.	1.00	425.00
06/06/23	CAU	Review documentation that we requested and that SA provided; translate correspondence from SA and distribute to internal team.	0.50	212.50
06/06/23	CAU	Review documents requested and sent over by CB; internally correspond regarding future request for more documents from CB.	0.40	170.00
06/06/23	STV	Revise and supplement analysis of interviews with CFX leaders	0.70	297.50
06/06/23	YKR	Continue drafting demand letters for various CFX leaders requesting documents and deposition testimony.	2.40	1,020.00
06/06/23	YKR	Correspond with library regarding Accurint reports on various CFX leaders which list the address and phone numbers for such leaders.	0.50	212.50
06/06/23	YKR	Revise draft interview summary of Sulay Aguado per edits from S. Themeli to share with the SEC at upcoming meeting.	1.20	510.00
06/06/23	YKR	Revise draft interview of Saul Varella per edits from S. Themeli.	0.90	382.50
06/06/23	YKR	Revise summary of Rosa Terran interview per edits from S. Themeli.	1.30	552.50
06/07/23	CAU	Further finalize SEC reports for RZ, SA, and RT; correspond with ER to try to schedule interview; correspond with SA regarding spreadsheets provided.	3.70	1,572.50
06/07/23	STV	Prepare for and interview CFX employee/volunteer E.R. and confer with the team re follow up matters	1.30	552.50
06/07/23	STV	Review documents produced by S.A., CFX leader, attention to payment of monthly allowance to Benvenuto; update Receivership website with new property sale.	0.40	170.00
06/07/23	YKR	Interview Elizabeth Reyes regarding her involvement with CFX and CFX operations.	2.40	1,020.00
06/07/23	YKR	Draft summary of Elizabeth Reyes interview.	2.90	1,232.50
06/07/23	YKR	Correspond with E. Reyes regarding production of CFX documents and request for further information regarding CFX operations.	0.40	170.00
06/08/23	STV	Supplement litigation plan	0.80	340.00
06/08/23	STV	Review documents produced by SA and ER, CFX leaders	0.40	170.00
06/08/23	STV	Confer with SEC counsel re case documents and information; coordinate preparation of deposition subpoenas	0.40	170.00
06/08/23	YKR	Revise interview summary of Rosa Teran per additional edits from S. Themeli.	0.90	382.50
06/08/23	YKR	Implement revisions to interview summaries of R. Zavala, R. Teran, S. Aguado, and S. Varela and finalize to be sent to the SEC.	1.50	637.50
06/08/23	YKR	Review and analyze documents produced by E.	1.40	595.00



33206.389768 3021400 08/09/2023

		Reyes following interview.		
06/08/23	YKR	Correspond with E. Reyes regarding production of CFX documents following interview.	0.30	127.50
06/08/23	YKR	Revise interview summary of S. Varela per additional edits from S. Themeli.	0.80	340.00
06/08/23	YKR	Continue to revise summary of S. Aguado per supplemental edits from S. Themeli.	0.90	382.50
06/08/23	YKR	Continue to revise summary of R. Zavala per edits from S. Themeli.	0.90	382.50
06/09/23	YKR	Draft demand letter to M. Fuentes requesting production of CFX related documents and deposition testimony regarding CFX involvement.	1.30	552.50
06/09/23	PEP	Analyze initial documents for background information and internal workup.	0.60	255.00
06/09/23	YKR	Draft subpoena for M. Buccio for the production of documents and deposition testimony as a follow-up to previously issued demand letter.	1.30	552.50
06/09/23	YKR	Draft demand letter to Raul Vasquez requesting production of CFX documents and deposition testimony.	1.40	595.00
06/09/23	YKR	Draft demand letter to Antonio Yenez requesting production of CFX documents and deposition testimony.	1.20	510.00
06/09/23	YKR	Draft subpoena to Omar Chavez requesting documents and deposition testimony as a follow-up to previously issued demand letter.	0.90	382.50
06/09/23	YKR	Draft subpoena to J. Galarza requesting documents and deposition testimony.	1.00	425.00
06/09/23	YKR	Draft subpoena to Juan Gomez requesting production of documents and deposition testimony.	1.20	510.00
06/12/23	STV	Confer with Y. Rashad re follow up calls with sales people; confer with e-discovery team re status of document	0.50	212.50
06/12/23	YKR	Call with I. Oviedo regarding receivership order in response to inquiry from her regarding same.	0.40	170.00
06/12/23	YKR	Discuss case strategy and fact development with J. Lewis, S. Askue, G. Hayes and S. Themeli.	0.60	255.00
06/12/23	YKR	Draft summary of call with J. Lewis, P. Pritchett, S. Askue, G. Hays, and M. Fleming and circulate to the receivership team for comment and follow up.	0.60	255.00
06/13/23	YKR	Draft summary of the interview of Gloria Castaneda.	3.70	1,572.50
06/13/23	YKR	Review and analyze recorded interview of Gloria Castaneda.	2.30	977.50
06/14/23	STV	Call with P Pritchett re case status and litigation strategy	1.10	467.50
06/14/23	STV	Call with investor Maria E.	0.20	85.00
06/14/23	PEP	Further analysis of upcoming action items.	1.30	552.50
06/14/23	YKR	Continue drafting interview summary of Gloria Castaneda.	0.80	340.00
06/14/23	YKR	Revise interview summary of G. Castaneda to be sent to SEC.	1.50	637.50
06/15/23	YKR	Draft summary of conference with SEC and circulate	0.60	255.00



33206.389768 3021400 08/09/2023

		same.		
06/15/23	YKR	Discuss strategy for expansion of receivership and turnover of real property with J. Lewis, S. Askue, C. Geiser, and P. Pritchett.	1.00	425.00
06/15/23	PEP	Participate in call with SEC regarding status of investigation.	1.00	425.00
06/15/23	PEP	Analyze various issues related to Blocktrace analysis in advance of call with SEC.	1.00	425.00
06/15/23	YKR	Conference with SEC regarding Blocktrace analysis and status of asset recovery.	1.00	425.00
06/16/23	CAU	Correspond with ER regarding documentation provided; review documentation; internally correspond regarding future document requests.	0.40	170.00
06/16/23	STV	Correspondence with counsel for Chavez and Webster re sale of personal property.	0.20	85.00
06/16/23	STV	NO BILL Finalize Receiver's second fee application and coordinate filing	0.50	No Charge
06/19/23	YKR	Draft demand letter to Julio Taffinder's children for turnover of funds received from Mauricio Chavez.	2.30	977.50
06/20/23	YKR	Correspond with property listing agent regarding sale of real property.	0.40	170.00
06/20/23	YKR	Discuss status of asset recovery and expansion of receivership on call with J. Lewis, P. Pritchett, and S. Askue.	0.60	255.00
06/20/23	YKR	Revise draft subpoenas and finalize for mailing.	1.10	467.50
06/21/23	YKR	Create spreadsheet tracking status of correspondences sent to CFX investors.	2.80	1,190.00
06/21/23	YKR	Discuss strategy of asset recovery with P. Pritchett.	0.50	212.50
06/22/23	YKR	Create spreadsheet tracking status of correspondences sent to leaders at CFX and responses to same.	1.60	680.00
06/26/23	CAU	Correspond with ER; correspond with Yara and internal team regarding documents sent by ER.	0.30	127.50
06/26/23	PEP	Review status of various action items for purposes of ensuring items are being advanced..	0.70	297.50
06/26/23	YKR	Meet with J. Lewis, P. Pritchett, S. Askue, G. Hayes to discuss status of case and recovery of assets.	1.00	425.00
06/27/23	PEP	Review cast of characters for identification of key personnel.	0.30	127.50
06/30/23	YKR	Revise section of case tracker with updates to correspondences issued to CFX leaders.	2.30	977.50
Subtotal for SEC04		Case Admin	247.60	\$96,292.00

SEC05 Claims Admin

06/15/23	CMG	Attend team meeting to determine additional third parties to send demands to.	1.30	\$552.50
06/28/23	PEP	Confer with victim regarding claims submissions.	0.20	85.00
Subtotal for SEC05		Claims Admin	1.50	\$637.50



33206.389768 3021400 08/09/2023

SEC08 Business Analysis

04/03/23	CAU	Correspond with investor JoAnna Luna regarding receivership case; correspond with supervisor regarding interview strategy.	0.40	\$170.00
04/26/23		Mia Fleming (CHI): Research on international company Switchain	1.00	180.00
Subtotal for SEC08 Business Analysis			1.40	\$350.00

SEC10 Data Analysis

04/03/23	LWP	Provide matter-specific database, document and case team support.	0.60	\$108.00
04/05/23	LWP	Provide matter-specific database, document and case team support.	0.30	54.00
04/12/23	LWP	Provide matter-specific database, document and case team support.	0.70	126.00
04/25/23	LWP	Provide matter-specific database, document and case team support.	0.80	144.00
05/05/23	LWP	Provide matter-specific database, document and case team support.	0.70	126.00
05/08/23	LWP	Provide matter-specific database, document and case team support.	0.50	90.00
05/22/23	LWP	Provide matter-specific database, document and case team support.	0.40	72.00
05/23/23	LWP	Provide matter-specific database, document and case team support.	0.40	72.00
06/08/23	LWP	Provide matter-specific database, document and case team support.	0.30	54.00
06/15/23	LWP	Provide matter-specific database, document and case team support.	0.40	72.00
Subtotal for SEC10 Data Analysis			5.10	\$918.00

SEC11 Status Reports

05/01/23	STV	Incorporate Receiver's and team's comments on the Receiver's report, prepare exhibits and coordinate filing of the same	0.90	\$382.50
05/01/23	STV	Revise and supplement Receiver's third interim report	0.60	255.00
05/02/23	MDD	Mia Fleming (CH): Research to obtain a background report for Juan Efrain Torres in Texas.	0.20	36.00
05/16/23	MDD	Mia Fleming (CH): Research to identify and obtain background reports for Hellen Interano, Gabriel Gonzales, Rina Mendieta and Juan Puac.	1.00	180.00
06/06/23	MDD	Mia Fleming (CH): Research to try to identify and obtain background reports for 4 individuals in Houston, TX.	1.00	180.00
Subtotal for SEC11 Status Reports			3.70	\$1,033.50



33206.389768 3021400 08/09/2023

SEC12 Litigation Consulting

04/03/23	ALTZ	Telephone conference with SalesForce regarding extending SalesForce.	0.60	\$255.00
04/03/23	ALTZ	Communicate with Ms. Themeli regarding extending SalesForce.	0.10	42.50
04/04/23	ALTZ	Communicate with Ms. Shane of SalesForce regarding the SalesForce licenses.	0.10	42.50
04/04/23	ALTZ	Communicate with Mr. Lewis and Ms. Themeli regarding extending SalesForce licenses.	0.10	42.50
04/04/23	ALTZ	Telephone conference with Ms. Shane, Mr. Rowedder and Ms. Memon of SalesForce regarding extending SalesForce.	0.40	170.00
05/15/23	YKR	Review and analyze status of litigation with S. Themeli, J. Lewis, and S. Askue.	0.50	212.50
06/15/23	PEP	Consider pre-litigation steps for various interested parties.	1.30	552.50
06/20/23	PEP	Review outstanding action items for purposes of making litigation determinations.	0.50	212.50
06/21/23	PEP	Further attention to pursuit of Vargas assets.	0.90	382.50
06/22/23	PEP	Further analysis of claims against Vargas.	0.70	297.50
06/26/23	PEP	Attention to subpoena to Chavez security company and failure to respond.	0.20	85.00
06/26/23	PEP	Finish initial draft of demand letter to Vargas.	1.50	637.50
06/27/23	PEP	Analyze records relating to Subpoena to Code Red security company.	0.40	170.00
06/27/23	PEP	Incorporate additional details into Vargas demand letter.	0.40	170.00
06/29/23	PEP	Attention to targets for litigation.	0.40	170.00
Subtotal for SEC12 Litigation Consulting			8.10	\$3,442.50

SEC13 Litigation

04/03/23	SIH	Review proposed Receiver Appointment documents and local rules and standing orders related to filing action notifying of receiver appointment and communicate with the Court regarding same	3.50	\$1,487.50
04/03/23	JAW	Attention to communications with ECF clerks re: filing of notice of receivership and refiling of same.	0.60	255.00
04/03/23	MKF	Preparation of documents received in response to document subpoena regarding C. Coloma, F. de Maria, and Zelle.	2.50	912.50
04/04/23	MKF	Perform Relativity searches regarding People's Trust Federal Credit Union.	1.70	620.50
04/04/23	MKF	Organization of case documents for substantive attorney review.	2.50	912.50
04/04/23	CMG	Finalize notice of receiver to be filed in the Northern District of GA.	0.60	255.00
04/05/23	STV	Analysis of 5th amendment cases in civil litigation involving company records in preparation for drafting motion to compel	3.50	1,487.50



33206.389768 3021400 08/09/2023

04/05/23	MKF	Organization of received case documents for substantive attorney review.	3.20	1,168.00
04/05/23	MKF	Preparation of correspondence to Investors regarding payment activities.	1.20	438.00
04/06/23	CMG	Communicate with Clerk' s office in Northern District of Georgia regarding notice of appointment of receiver.	0.40	170.00
04/12/23	MKF	Preparation of Demand Letters to S. Varela and L. Serrano.	2.00	730.00
04/12/23	MKF	Perform searches regarding L. Serrano and S. Varela.	2.00	730.00
04/13/23	KKP	Revise receiver's motion to compel.	0.50	212.50
04/17/23	MKF	Preparation of Receiver's Subpoena of Documents to Colony Ridge Land LLC and Colony Ridge Development LLC.	2.00	730.00
04/18/23	MKF	Review of Plaintiff's personal property list and agreed property list.	2.30	839.50
04/20/23	STV	Revise and supplement motion to compel, prepare exhibits to the same	1.20	510.00
04/21/23	MKF	Preparation of exhibits to be filed with Receiver's Motion to Compel	2.00	730.00
04/24/23	STV	Draft Receiver's Third Interim Report; update exhibits to th emotion to compel, emails with counsel for Chavez re same; coordinate filing of the motion; review email form Counsel re motion to modify TRO and receivership order	3.20	1,360.00
04/24/23	MKF	Perform Relativity searches regarding M. Chavez correspondence.	1.00	365.00
04/24/23	MKF	Continued preparation of exhibits to be filed with Receiver's Motion to Compel	2.20	803.00
04/26/23	MKF	Preparation of Receiver's Subpoena for Documents to Binance.US and Coinbase.	2.00	730.00
04/28/23	MKF	Preparation and organization of materials to be added to Receiver's website.	2.00	730.00
05/01/23	MKF	Perform Relativity searches regarding leader J. E. Torres.	1.50	547.50
05/01/23	MKF	Preparation of documents received in response to document subpoena regarding American Express.	2.50	912.50
05/02/23	STV	Prepare for and conduct interview of AM, CFX employee, confer with the S. Askue and Receiver re same	3.30	1,402.50
05/02/23	STV	Revise subpoenas and demand letters and coordinate service of the same; confer with Hays group re new crypto wallets; review discovery responses from Binance.US and confer with Hays Group re same; call with team re upcoming tasks	2.30	977.50
05/02/23	MKF	Preparation of Demand Letters to S. Varela and L. Serrano.	2.50	912.50
05/02/23	MKF	Organization of case documents for substantive attorney review.	2.50	912.50
05/03/23	MKF	Preparation of Receiver's Subpoena of Documents to Switchain.	1.00	365.00



33206.389768 3021400 08/09/2023

05/03/23	MKF	Organization of case pleadings to be uploaded to Receiver's website.	1.00	365.00
05/04/23	MKF	Organization of documents in Response to Receiver's Subpoena regarding G. Oseguera and I. Sanchez.	2.00	730.00
05/05/23	MKF	Organization of case documents for substantive attorney review.	2.50	912.50
05/08/23	MKF	Review and analysis of background reports regarding A. Aich, R. Guilfarro, H. Salido, R. Zavala and G. Castaneda.	2.50	912.50
05/12/23	MKF	Preparation and organization of M. Chavez list of property to be submitted and turned over to the Receiver.	1.00	365.00
05/15/23	STV	Coordinate preparation of additional subpoenas to third parties	0.40	170.00
05/15/23	MKF	Preparation of documents received in response to document subpoena regarding Switchchain and S. Reyes.	1.50	547.50
05/15/23	MKF	Review and analysis of background reports regarding H. Interano, R. Mendieta and J. Puac.	2.50	912.50
05/18/23	STV	Confer with the Hays group re subpoena responses from crypto currency platforms and coordinate follow up letters	0.30	127.50
05/18/23	STV	Coordinate service of notices of lis pendens filed in Liberty county	0.10	42.50
05/22/23	STV	Review Chavez's response to Motion to Compel and draft Reply in support of the motion; confer with the Receiver re same	1.20	510.00
05/22/23	MKF	Preparation of Receiver's Subpoena of Documents to Code Red Security Systems.	1.50	547.50
05/23/23	STV	Supplement and revise reply in support of motion to compel, coordinate filing, confer with the Receiver and team re same	1.40	595.00
05/23/23	MKF	Preparation of Cease and Desist letter to E. Chalco.	0.50	182.50
05/24/23	STV	Review summaries of Salesforce and leader commissions prepared by S. Askue in preparation of call with counsel for SEC.	0.70	297.50
05/24/23	MKF	Organization of case documents for substantive attorney review.	2.50	912.50
05/25/23	STV	Prepare for and attend status call with SEC counsel	1.50	637.50
06/05/23	MKF	Perform searches regarding Demand Letters and follow-up communications.	2.30	839.50
06/05/23	MKF	Preparation of Cease and Desist Letters to be shared with counsel.	2.50	912.50
06/06/23	STV	Analysis of case documents and prepare litigation strategy memorandum	0.70	297.50
06/08/23	MKF	Preparation of Demand Letters to M. Palma, R. Rivera, S. Martinez, J. Oviedo, J. Hernandez, S. Garcia and P. Enriques.	2.00	730.00
06/12/23	MKF	Perform searches regarding Leaders Excel spreadsheets.	3.00	1,095.00
06/13/23	STV	Review analysis of Receivership assets held by A.	2.60	1,105.00



33206.389768 3021400 08/09/2023

		Vargas; prepare case plan and upcoming tasks and analysis of third party claims		
06/15/23	STV	Meeting with the Receiver and team re litigation strategy	1.20	510.00
06/15/23	MKF	Perform searches regarding data and case information to be included with Receiver's Fee Application.	3.00	1,095.00
06/16/23	MKF	Continued searches regarding data and case information to be included with Receiver's Fee Application.	3.00	1,095.00
06/21/23	PEP	Further attention to decisions towards viable litigation prospects.	1.50	637.50
06/26/23	MKF	Perform searches regarding Salesforce data.	3.20	1,168.00
06/29/23	MKF	Organization of recent case pleadings to be added to Receiver's Website.	0.80	292.00
Subtotal for SEC13		Litigation	106.60	\$40,751.00

SEC14 Forensic Accounting

05/12/23	STV	Review analysis of defendant's CFX/CBT related transactions and confer with Scott Askue and Receiver re same	1.30	\$552.50
05/18/23	STV	Email with Hays group and Coinbase re tax reporting to IRS on crypto accounts	0.20	85.00
Subtotal for SEC14		Forensic Accounting	1.50	\$637.50

SEC16 Valuation

04/03/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	\$90.00
05/01/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
05/02/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
05/15/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
Subtotal for SEC16		Valuation	2.00	\$360.00
Total			409.10	\$157,852.00

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
SIH	Stephen I. Hansen	3.50	\$425.00	\$1,487.50
ALTZ	Arlen L. Tanner	5.30	425.00	2,252.50
STV	Sonila Themeli	102.00	425.00	43,350.00
JAW	Joshua A. Weiner	0.60	425.00	255.00
CMG	Caroline M. Gieser	7.40	425.00	3,145.00



33206.389768 3021400 08/09/2023

Initials	Name	Hours	Rate	Amount
KKP	Kierra K. Powell	3.70	425.00	1,572.50
PEP	Poston E. Pritchett	15.50	425.00	6,587.50
YKR	Yara K. Rashad	128.50	425.00	54,612.50
CAU	Cesar A. Udave	35.20	425.00	14,960.00
MKF	Mia K. Fleming	75.90	365.00	27,703.50
MDD	Marit D. Bang	2.20	180.00	396.00
LJG	Leslie J. Gasper	0.40	180.00	72.00
	Stacey A. Mitchell	1.00	180.00	180.00
LWP	Levi W. Percy	7.10	180.00	1,278.00
Total Fees		388.30		\$157,852.00

Disbursements

Date	Description	Amount
Expense Code: E101		
05/07/23	Mayra Malone Reporting, Inc - Copies Mayra Malone Reporting, Inc, Transcript of March 23, 2023 show cause hearing before Judge Hanen	\$116.80
Subtotal for	E101	\$116.80

Expense Code: E102		
04/14/23	Imaging Services - Scan Paper Documents (944 @ 0.10)	\$94.40
05/02/23	Imaging Services - Print Color Document (19 @ 0.50)	9.50
05/11/23	Imaging Services - OCR - Create Searchable PDF file or Color Image File (88 @ 0.02)	1.76
05/11/23	Imaging Services - Scan Paper Documents (88 @ 0.10)	8.80
05/15/23	Imaging Services - Print Color Document (12 @ 0.50)	6.00
05/15/23	Imaging Services - Scan Paper Documents (24 @ 0.10)	2.40
05/16/23	Imaging Services - Print Color Document (7 @ 0.50)	3.50
05/19/23	Imaging Services - Print Black and White documents (17 @ 0.12)	2.04
05/19/23	Imaging Services - Print Color Document (158 @ 0.50)	79.00
06/09/23	Imaging Services - Create Thumb Drive - 128 Gig (1 @ 70.00)	70.00
06/14/23	Imaging Services - Scan Paper Documents (23 @ 0.10)	2.30
Subtotal for	E102	\$279.70

Expense Code: E106		
04/05/23	Westlaw	\$495.05
04/06/23	Westlaw	2,310.23
04/06/23	Westlaw	336.43
04/11/23	Westlaw	214.91
04/21/23	Westlaw	825.08
04/26/23	Lexis Legal Research	84.15
04/27/23	Westlaw	163.20



33206.389768 3021400 08/09/2023

Date	Description	Amount
04/30/23	Legal Database Searches Accurint	80.27
04/30/23	Pacer	0.60
04/30/23	Pacer	6.10
05/08/23	Westlaw	154.80
05/08/23	Courtlink	84.15
05/30/23	Courtlink	84.15
05/31/23	Legal Database Searches Accurint	95.90
06/30/23	Legal Database Searches Accurint	159.05
Subtotal for	E106	\$5,094.07

Expense Code: E107

05/15/23	Delivery-UPS	\$15.57
06/05/23	Delivery - UPS	15.68
06/08/23	Delivery - Federal Express - 772392617889 - from Arlen Tanner to ENF-CPU (U.S. Securities & Exchange	19.44
Subtotal for	E107	\$50.69

Expense Code: E108

05/09/23	Special Postage	\$4.44
05/09/23	Special Postage	19.44
05/12/23	Special Postage	9.72
05/18/23	Special Postage	9.00
05/18/23	Special Postage	9.00
05/18/23	Special Postage	9.00
05/18/23	Special Postage	9.00
05/18/23	Special Postage	0.84
05/18/23	Special Postage	9.00
05/18/23	Special Postage	0.84
05/18/23	Special Postage	0.84
05/18/23	Special Postage	0.84
05/18/23	Special Postage	9.00
05/18/23	Special Postage	9.00
05/18/23	Special Postage	0.84
05/18/23	Special Postage	0.84
05/18/23	Special Postage	0.84
05/18/23	Special Postage	12.55
05/18/23	Special Postage	9.00
05/18/23	Special Postage	9.00
05/18/23	Special Postage	0.84
05/18/23	Special Postage	0.84
05/18/23	Special Postage	0.84
05/18/23	Special Postage	0.84
05/18/23	Special Postage	9.00
05/18/23	Special Postage	9.00



33206.389768 3021400 08/09/2023

Date	Description	Amount
05/18/23	Special Postage	0.84
05/18/23	Special Postage	9.00
05/18/23	Special Postage	0.84
05/30/23	Special Postage	38.88
05/30/23	Special Postage	8.88
06/06/23	Special Postage	58.32
06/06/23	Special Postage	13.32
06/08/23	Special Postage	15.54
06/08/23	Special Postage	68.04
06/30/23	Houston Express, Inc - Postage Houston Express, Inc, Outgoing mail delivery and fuel surcharges, June 2023.	14.00
Subtotal for	E108	\$381.21

Expense Code: E110

10/06/22	Caroline Gieser, Taxi/Car Service, SEC Receivership - Houston, TX, 09/19/22	\$41.61
10/06/22	Caroline Gieser, Taxi/Car Service, SEC Receivership - Houston, TX, 09/20/22	35.89
10/06/22	Caroline Gieser, Airfare - Coach from Atlanta to Houston, SEC Receivership - Houston, TX, 09/19/2022 - 09/20/2022	481.20
10/06/22	Caroline Gieser, Lodging, SEC Receivership - Houston, TX, 09/19/2022 - 09/20/2022	168.36
10/19/22	Caroline Gieser, Lodging, SEC Receivership - Houston. TX, 09/30/2022 - 10/03/2022	827.19
10/19/22	Caroline Gieser, Car Rental, SEC Receivership - Houston. TX, 09/30/2022 - 10/03/2022	679.13
10/19/22	Caroline Gieser, Taxi/Car Service, SEC Receivership - Houston. TX, 10/03/22	43.14
10/19/22	Caroline Gieser, Taxi/Car Service, SEC Receivership - Houston. TX, 09/30/22	39.57
04/05/23	Ruby Hyde - Travel Related Expense Ruby, Taxi/Car Service from , COURT FILING FEE FOR MISCELLANEOUS ACTION IN CONNECTICUT, 04/05/2023	10.02
Subtotal for	E110	\$2,326.11

Expense Code: E111

10/06/22	Caroline Gieser, Breakfast, SEC Receivership - Houston, TX, 09/20/22	\$9.20
10/06/22	Caroline Gieser, Breakfast, SEC Receivership - Houston, TX, 09/19/22	11.64
10/06/22	Caroline Gieser, Lunch, SEC Receivership - Houston, TX, 09/20/22	24.56
10/06/22	Caroline Gieser, Dinner, SEC Receivership - Houston, TX, 09/19/22	33.90
10/06/22	Caroline Gieser, Hotel - Meals Other, SEC Receivership - Houston, TX, 09/19/22	4.33



33206.389768 3021400 08/09/2023

Date	Description	Amount
10/19/22	Caroline Gieser, Dinner, SEC Receivership - Houston. TX, 10/01/22	28.89
Subtotal for	E111	\$112.52

Expense Code: E112

03/06/23	Commerce Bank - Court Filing Fees Commerce Bank, Notice of filing	\$49.00
04/03/23	Stephen I. Hansen - Court Filing Fees Steve, Filing Fees, Filing Fee-Boston, MA, 04/03/2023	49.00
04/05/23	Ruby Hyde - Court Filing Fees Ruby, Filing Fees, COURT FILING FEE FOR MISCELLANEOUS ACTION IN CONNECTICUT, 04/05/2023	49.00
04/16/23	Sonila Themeli - Court Filing Fees Sonila, Court Costs, Liberty County, Texas recording fee for 12 Notices of Lis Pendens., 04/16/2023	360.00
Subtotal for	E112	\$507.00

Expense Code: E118

02/28/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, SEC Invoice for February	\$8,630.35
03/31/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for March 2023, related to SEC v. Mauricio Chavez, et al.	6,210.43
04/30/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for April 2023, related to SEC v. Mauricio Chavez, et al.	4,359.25
05/31/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for May 2023, related to SEC v. Mauricio Chavez, et al.	19,469.45
05/31/23	Valerie Muniz Hayes - Litigation Support Valerie Muniz Hayes, Real property notice of Lis Pendens and copies of some during March 2023. Elite/Chrome dark period.	40.00
Subtotal for	E118	\$38,709.48

Expense Code: E124

03/06/23	Commerce Bank - Advertising Commerce Bank, Greensheet Advertisement for Sale of Property	\$24.50
03/06/23	Commerce Bank - Advertising Commerce Bank, Greensheet Advertisement for Sale of Property	23.80
04/04/23	Commerce Bank - Advertising Commerce Bank, The Green Sheet Advertisement.	24.50
Subtotal for	E124	\$72.80

Total Disbursements	\$47,650.38
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Current Disbursements	47,650.38
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Total Amount Due	\$205,502.38
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Exhibit C

STANDARDIZED FUND ACCOUNTING REPORT for
Receivership in SEC v. Mauricio Chavez, Giorgio Benvenuto and Crypto FX, LLC - Cash Basis
Receivership; Civil Court Docket No. 4:22-cv-3359
Reporting Period 04/01/2023 to 06/30/2023

FUND ACCOUNTING (See Instructions:)				
		<u>Detail (for Current Period)</u>	<u>Subtotal (From Prior Period)</u>	<u>Grand Total (All Periods)</u>
Line 1	Beginning Balance	\$3,589,049.95		\$0.00
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 3	Cash and Securities	\$86,914.59	\$3,392,411.14	\$3,479,325.73
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$65,026.82	\$67,798.11	\$132,824.93
Line 6	Personal Asset Liquidation	\$80,262.93	\$0.00	\$80,262.93
Line 7	Third-Party Litigation Income	\$0.00	\$0.00	\$0.00
Line 8	Miscellaneous - Other (Attorney Escrows)	\$0.00	\$527,347.20	\$527,347.20
	<i>Total Funds Available (Lines 1-8)</i>	<i>\$3,821,254.29</i>		<i>\$4,219,760.79</i>
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors	\$0.00	\$0.00	\$0.00
Line 10	Disbursements for Receivership Operations			
Line 10a	<i>Disbursements to Receiver or Other Professionals</i>	\$0.00	\$375,336.50	\$375,336.50
Line 10b	<i>Business Asset Expenses</i>	\$3,837.60	\$5,170.00	\$9,007.60
Line 10c	<i>Personal Asset Expenses (Includes monthly budget for Defendant)</i>	\$155,817.64	\$18,000.00	\$173,817.64
Line 10d	<i>Investment Expenses</i>	\$0.00	\$0.00	\$0.00
Line 10e	<i>Third-Party Litigation Expenses</i>			
	1. Attorney Fees	\$0.00	\$0.00	\$0.00
	2. Litigation Expenses	\$0.00	\$0.00	\$0.00
	<i>Total Third-Party Litigation Expenses</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Line 10f	<i>Tax Administrator Fees and Bonds</i>	\$0.00	\$0.00	\$0.00
Line 10g	<i>Federal and State Tax Payments</i>	\$0.00	\$0.00	\$0.00
	Total Disbursements for Receivership Operations	\$159,655.24	\$398,506.50	\$558,161.74
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	<i>Distribution Plan Development Expenses:</i>			
	1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	<i>Total Plan Development Expenses</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Line 11b	<i>Distribution Plan Implementation Expenses</i>			
	1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification			
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	Web Site Maintenance/Call Center	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses	\$0.00	\$0.00	\$0.00
	<i>Total Plan Implementation Expenses</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
	Total Disbursements for Distribution Expenses Paid by the Fund			
Line 12	Disbursements to Court/Other:			
Line 12a	<i>Investment Expenses/Court Registry Investment System (CRIS) Fees</i>	\$0.00	\$0.00	\$0.00
Line 12b	<i>Federal Tax Payments</i>	\$0.00	\$0.00	\$0.00
	Total Disbursement to Court/Other:	\$0.00	\$0.00	\$0.00
	Total Funds Disbursed (Line 9-11):	\$159,655.24	\$398,506.50	\$558,161.74
Line 13	Ending Balance (As of 6/30/2023):	\$3,661,599.05		\$3,661,599.05

Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	\$3,661,599.05	\$0.00	\$3,661,599.05
Line 14b	Investments	\$0.00	\$0.00	\$0.00
Line 14c	Other Assets or Uncleared Funds (Frozen Accounts)	\$0.00	\$0.00	\$0.00
	Total Ending Balance of Fund - Net Assets	\$3,661,599.05	\$0.00	\$3,661,599.05

OTHER SUPPLEMENTAL INFORMATION:				
		<u>Detail</u>	<u>Subtotal</u>	<u>Grand Total</u>
Line 15	Report of Items NOT To Be Paid by the Fund:			
	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 15a	Plan Development Expenses Not Paid by the Fund:			
	1. Fees:	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	Total Plan Development Expenses Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 15b	Plan Implementation Expenses Not Paid by the Fund:			
	1. Fees:			
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification:			
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	Web Site Maintenance/Call Center	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. FAIR Reporting Expenses	\$0.00	\$0.00	\$0.00
	Total Plan Implementation Expenses Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 15c	Tax Administrator Fees & Bonds Not Paid by the Fund	\$0.00	\$0.00	\$0.00
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			
Line 16	Disbursements to Court/Other Not Paid by the Fund:			
Line 16a	Investment Expenses/CRIS Fees	\$0.00	\$0.00	\$0.00
Line 16b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total disbursements to Court/Other Not Paid by the Fund:			
Line 17	DC & State Tax Payments	\$0.00	\$0.00	\$0.00
Line 18	No. of Claims:			
Line 18a	# of Claims Received This Reporting Period			0
Line 18b	# of Claims Received Since Inception of Fund			0
Line 19	No. of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid This Reporting Period			0
Line 19b	# of claimants/Investors Paid Since Inception of Fund			0

Receiver:

By:

(signature)

John Lewis, Jr.

(printed name)

Receiver

(title)

Date: August 17, 2023

Exhibit D

SEC v. CryptoFX LLC et al
Receipts and Disbursements**Receipts**

Cash	Cash located at 1124 Blalock	\$53,346
Cash in Safe	Recovered from two safes at Blalock	\$392,765
First Community Credit Union	Closed Benvenuto bank account	\$407,042
First Community Credit Union	Closed Benvenuto bank account	\$44,406
Bank of America	Closed Benvenuto bank account	\$16,825
Bank of America	Closed Benvenuto bank account	\$4,500
Simmons Bank	Closed Benvenuto bank account	\$80,764
Simmons Bank	Closed CBT bank account	\$247,916
Regions Bank	Closed Chavez bank account	\$782
Coinbase, Inc.	Proceeds from liquidation of crypto account	\$982,924
Blockchain.com	Proceeds from liquidation of crypto account	\$1,161,141
Burford Perry LLC	Balance of retainer	\$155,631
Gerger Hennessy & Martin LLP	Balance of retainer	\$214,488
Jones Walker Retainer	Turned over to Receiver	\$102,229
Televisions	Located at 1124 Blalock	\$3,040
Pratt & Flack LLP	Cash turned over to the Receiver by Chavez	\$55,000
Hogan Lane, Hempstead TX	Net sale proceeds from sale of real property	\$64,758
Exodus Wallet	BTC, Tether & Solana. Liquidated in April 2023	\$86,915
28 Lawrence Marshall Dr, Hempstead, TX	Net sale proceeds from sale of real property	\$65,027
2020 Volkswagen Tiguan	Turned over to Receiver by Angelica Vargas and liquidated	\$16,695
2021 Mercedes-Benz GLE AMG	Turned over to Receiver by Mauricio Chavez and liquidated	\$63,568
Total Receipts		\$4,219,761

Disbursements

Webster's Auction Palace, Inc.	Inspection of contents at 1616 Post Oak Blvd	\$2,000
Hays Financial Consulting, LLC	Professional Fees and Expenses thru 12/31/22	\$95,264
John Lewis Jr., Receiver	Professional Fees and Expenses thru 12/31/22	\$62,895
Shook Hardy & Bacon, LLP	Professional Fees and Expenses thru 12/31/22	\$215,924
Pugh Accardo, LLC	Professional Fees and Expenses thru 12/31/22	\$554
Frank Jack Sodetz III	Fee for researching the on-going fraud in Chicago	\$700
Appraisal MC	Appraisal for Lot 1- Mack Washington, Hempstead TX	\$1,875
Plateau Land and Wildlife Management, Inc	Refile Wildlife Management Plan with Biologist Site Visit	\$1,295
Giorgio Benvenuto	Monthly Allowance - \$6,000 per month - Thru June 2023	\$36,000
Pratt & Flack LLP	Fees & Expenses paid per Court Order, Docket # 67	\$101,368
SalesForce	Prepayment for data hosting	\$3,838
Santander Consumer USA	BMW Lien payoff prior to sale of same	\$36,450
Total Disbursements		\$558,162

Cash in Bank (6/30/2023)**\$3,661,599**

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

VS.

MAURICIO CHAVEZ, GIORGIO
BENVENUTO and CryptoFX, LLC,

Defendants.

CBT Group, LLC,

Relief Defendant.

[illegible]

CIVIL ACTION NO. 4:22-CV-03359

JUDGE ANDREW S. HANEN

**RECEIVER'S CERTIFICATION IN SUPPORT OF
THIRD INTERIM FEE APPLICATION**

I, John Lewis, Jr., the court appointed Receiver in the above captioned matter and in connection with the Third Fee Application (“Application”) therein do hereby certify that:

- (a) I have read the Application;
- (b) to the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses in it are true and accurate and comply with the SEC Billing Instructions;
- (c) all fees contained in the Application are based on the rates listed in the applicant's fee schedule and this Court's orders. All fees contained in the Application are reasonable, necessary and commensurate with the skill and experience required for the activity performed;
- (d) the amount for which reimbursement is sought does not include the amortization of the cost of any investment, equipment, or capital outlay; and

- (e) the requests for reimbursement of services that were justifiably purchased or contracted for from third parties (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), include only the amount billed to Shook, Hardy & Bacon by the third-party vendor and paid by Shook, Hardy & Bacon to such vendor.

Dated: August 17, 2023

/s/ John Lewis, Jr.

John Lewis Jr., Receiver

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

VS.

MAURICIO CHAVEZ, GIORGIO
BENVENUTO and CryptoFX, LLC,

Defendants.

CBT Group, LLC,

Relief Defendant.

[illegible]

CIVIL ACTION NO. 4:22-CV-03359

JUDGE ANDREW S. HANEN

**ORDER AUTHORIZING PAYMENT OF RECEIVER'S
THIRD CERTIFIED INTERIM FEE APPLICATION**

On August 17, 2023, counsel for John Lewis, Jr., the Court-appointed Receiver for Mauricio Chavez (“Chavez”), Giorgio Benvenuto (“Benvenuto”), CryptoFX, LLC (“CryptoFX”), and CBT Group, LLC (“CBT”), filed an Application Authorizing Payment of Receiver’s Third Certified Interim Fee Application for the Receiver and His Counsel (“SCIFA”), which seeks approval of the fees incurred by the Receiver and the Receiver’s Retained Professionals from April 1, 2023 through June 30, 2023 (the “Application Period”).

Pursuant to the Receivership Order, paragraph 58, the Receiver served a copy of the proposed SCIFA, together with all exhibits and billing information to counsel for the SEC. Receiver and counsel for the SEC have conferred regarding the Receiver's TCIFA, its compliance with the SEC's Billing Guidelines and this Court's Receivership Order, and the reasonableness of the costs and expenses incurred in the ordinary course of the administration and operation of the Receivership. The SEC does not oppose the Receiver's Application. The Court finds and

determines that good cause exists to approve the Receiver's Third Certified Interim Fee Application. Accordingly, the Court finds and determines as follows:

(a) The Receiver's Third Certified Interim Fee Application should be and hereby is granted; it is further ordered that

(b) That the Receiver be conditionally awarded fees incurred during the Third Interim Fee Application in the amount of \$37,695.00; it is further ordered that

(c) That the Receiver's Retained Professionals be awarded fees incurred during the Third Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$157,852.00; it is further ordered that

(d) That the out-of-pocket costs and expenses incurred by the Receiver in the ordinary course of the administration and operation of the Receivership, as set out more fully in this SCIFA in the aggregate amount of \$47,650.38, are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

IT IS SO ORDERED this ____ day of ____, 2023.

JUDGE ANDREW S. HANEN
UNITED STATES DISTRICT JUDGE