

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

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
vs.	§	
	§	
MAURICIO CHAVEZ, GIORGIO BENVENUTO and CryptoFX, LLC,	§	CIVIL ACTION NO. 4:22-CV-03359
	§	
<i>Defendants.</i>	§	JUDGE ANDREW S. HANEN
	§	
CBT Group, LLC,	§	
	§	
<i>Relief Defendant.</i>	§	

RECEIVER’S SIXTH CERTIFIED INTERIM FEE APPLICATION

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 Sixth Certified Interim Fee Application, showing the Court as follows:

SUMMARY OF FEE REQUEST

1. This Sixth Certified Interim Fee Application (“SCIFA”) covers the period from January 1, 2024 to March 31, 2024 (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 Sixth fee application that the Receiver has made for himself and his retained professionals. 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 was granted by the Court on August 31, 2023 (Doc. Nos. 75, 89). The Receiver also filed a Third Interim Fee Application for Hays Financial Consulting, LLC (“HFC”) on August 8, 2023, at the request of HFC, and then filed his own Third Interim Fee Application on August 17, 2023, both of which were granted by the Court on August 31, 2023 (Doc. Nos. 90, 91). On November 17, 2023, the Receiver filed his fourth certified fee application covering the period from July 1, 2023 to September 30, 2023, which was granted by the Court on December 4, 2023 (Doc. No. 106). On January 30, 2024, the Receiver filed his fifth certified fee application covering the period from October 1, 2023 to December 31, 2023, which was granted by the Court on February 28, 2024 (Doc. No. 116).

3. The fees incurred during the Application Period by the Receiver and professionals retained by the Receiver and for which payment is requested, are as follows: \$22,102.52 John Lewis, Jr. (*see* Receiver’s Invoice attached as **Exhibit A**); \$54,378.68 Shook, Hardy & Bacon L.L.P. (“SHB”) (*see* SHB Invoice attached as **Exhibit B**); \$4,719.60 Hays Financial Consulting, LLC (“Hays”) (*see* Hays Invoice attached as **Exhibit C**); and \$25,848.00 BlockTrace, LLC (“BlockTrace”) (*see* BlockTrace Invoice attached as **Exhibit D**). The Receiver’s professional fees listed above have been reduced by \$787.48. Further, his counsel’s fees have been reduced by \$8,160.00.

4. The Receiver served a copy of this SCIFA, together with all exhibits and billing information to counsel for the SEC. The Receiver and counsel for the SEC have conferred about the SCIFA 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 SCIFA as follows: to the Receiver in the amount of \$22,102.52; to Shook Hardy and Bacon, LLP in the amount of \$54,378.68; to Hays in the amount of \$4,719.60; and to BlockTrace in the amount of \$25,848.00. 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 \$2,862.18.

STANDARDIZED FUND ACCOUNTING REPORT

6. Attached as **Exhibit E** is the Standardized Fund Accounting Report ("SFAR") for the Receivership for the Application Period.

CASE STATUS

7. Cash on Hand: The Receivership Estate has \$3,398,709 deposited in four trust accounts named for each of the Defendants as of the end of the Application Period (December 31, 2023). These funds were received by (i) taking possession of cash located at the Defendants' office located at 1124 Blalock, Houston, Texas 77055 (\$53,346); (ii) taking possession of safes located at the Defendants' office (\$392,765); (iii) taking possession of First Community Credit Union bank accounts owned by Benvenuto (\$451,448); (iv) taking possession of Bank of America bank accounts owned by Benvenuto (\$21,325); (v) taking possession of a Simmons bank account owned by Benvenuto (\$80,764); (vi) taking possession of a Simmons bank account owned by CBT

(\$247,916); (vii) taking possession of a Regions bank account owned by Chavez (\$782); (viii) proceeds from liquidating Coinbase, Inc. account (\$982,924); (ix) proceeds from liquidating Blockchain.com account (\$1,161,141); (x) taking possession of the balance of a retainer from Burford Perry LLC (\$155,631); (xx) taking possession of the balance of retainers from Gerger Hennessy & Martin LLP (\$214,488); (xxi) taking possession of the balance of retainers from Jones Walker LLP (\$102,229); (xxii) taking possession of CryptoFX funds turned over by Defendant Mauricio Chavez (\$55,000); (xxiii) proceeds from liquidating real property at 0 Hogan Lane (\$64,758); (xxiv) proceeds from liquidating televisions (\$3,040); (xxv) proceeds from liquidating bitcoin from an exodus wallet (\$86,915); (xxvi) net sale proceeds from sale of real property at 28 Lawrence Marshall Dr. (\$65,027); (xxvii) proceeds from liquidating 2020 Volkswagen Tiguan owned by Angelica Vargas (\$16,695); (xxix) proceeds from liquidating 2021 Mercedes-Benz GLE AMG owned by Angelica Vargas (\$63,568); (xxx) net auction proceeds from personal property turned over by Defendant Mauricio Chavez (\$9,267); (xl) proceeds from liquidating real property at 0 Mack Washington (\$1,027,280.34).

8. All four Receivership trust accounts are held with Webster Bank, N.A., a wholly-owned subsidiary of Farrington Place Corporation, Webster Investment Services, Inc., Webster Mortgage Investment Corporation, MyWebster, Inc., Webster Community Development Corporation, Webster Capital Finance, Inc., Webster Business Credit Corporation, Webster Growth Capital Corporation, Webster Mortgage Company, and Webster Massachusetts Security Corporation. The four trust accounts were previously held with Flagstar N.A. 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, Webster 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 (December 31, 2023) the Receiver has on hand the following assets:

Asset	Estimated Amount/Value
Various Laptops and desktop computers	\$5,000
2022 BMW X6 M501	\$64,600
CFX furniture and fixtures	\$2,000
Benvenuto Holdings frozen bank accounts at First Community Credit Union	\$110,702

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). 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). Since the filing of Receiver's fourth certified fee application, Receiver has filed a Motion to Approve the Sale of real property located at 0 Mack Washington (Doc. No 97), which was granted by the Court on November 8, 2023 (Doc. No. 98) and which has netted \$1,027,280.34 to the Receivership Estate. Receiver plans on filing Motions for the sale of additional personal property, including a 2022 BMW X6 M501.

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 \$2,862.18 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$2,862.18 were advanced by SHB.

13. Investor/Creditor 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 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
43.60	<i>See Ex. A</i>	\$22,102.52	\$0	\$22,102.52

**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
143.10	<i>See Ex. B</i>	\$51,516.50	\$2,862.18	\$54,378.68

**Receiver's Accountant, Hays Financial Consulting, LLC
Fees and Expenses for Application Period**

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
18.20	<i>See Ex. C</i>	\$4,719.60	\$0	\$4,719.60

**Receiver's Cryptocurrency Analysts, BlockTrace, LLC
Fees and Expenses for Application Period**

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
71.80	<i>See Ex. D</i>	\$25,848.00	\$0	\$25,848.00

26. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$54,378.68 for the Application Period. The Receiver asks the Court to approve payments to the Receiver, on an interim basis in the amount of \$22,102.52 for the Application Period. The Receiver asks the Court to approve payments to Hays in the amount of \$4,719.60 for the Application Period. The Receiver asks the Court to approve payments to BlockTrace in the amount of \$25,848.00 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
Business Operations	1.60	\$840.00
Case Administration	34.60	\$17,377.50
Asset Disposition	1.80	\$945.00
Business Analysis	1.60	\$840.00
Litigation	4.00	\$2,100.00

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

Task Description	Hours Worked	Total Fees
Asset Analysis	1.90	\$807.50
Case Administration	36.10	\$14,025.00
Claims Administration	3.10	\$1,317.50
Data Analysis	2.80	\$504.00
Status Reports	18.00	\$807.50
Litigation Consulting	47.60	\$20,230.00
Litigation	33.60	\$13,825.00

Receiver's Accountant, Hays Financial Consulting, LLC

Task Description	Hours Worked	Total Fees
Accounting	2.20	\$607.20
Asset Analysis & Recovery	0.20	\$55.20
Business Analysis	6.60	\$1,821.60
Claims Administration & Objections	8.00	\$2,208.00
Fee/ Employment Applications & Objection	1.90	NO CHARGE
Tax Issues	0.10	\$27.60

Receiver's Cryptocurrency Analyst, BlockTrace, LLC

Task Description	Hours Worked	Total Fees
Data Analysis JD	25.30	\$9,108.00
Data Analysis JC	6.40	\$2,304.00
Data Analysis KD	40.10	\$14,436.00

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.3rd 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 C** 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 Hays in connection with the administration of the Receivership.
- **Exhibit D** 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 BlockTrace in connection with the administration of the Receivership.

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 \$787.48. And, SHB's fees have been reduced by \$8,160.00 SHB's expenses 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. Coordinating with interested stakeholders regarding the development of a submission based claims process that matches the idiosyncrasies associated with the limited CryptoFX documentation;
- d. Identifying and securing receivership assets;
- e. Maintaining cryptocurrency wallets and/or accounts containing Bitcoin cryptocurrency;

- f. Coordinating valuation and sale of Receivership personal property;
- g. Corresponding with third parties to identify potential receivership assets;
- h. Reviewing CryptoFX and CBT business records obtained from investors or in response to third-party subpoenas;
- i. Analyzing company records to evaluate potential claims against third parties;
- j. Managing a Relativity database in order to store and review company documents.
- k. Conducting public records searches and related due diligence to affiliated parties, entities, and other potential relief defendants;
- l. Preparing the Receiver's Fifth Interim Status Report;
- m. Reviewing records received from third parties to perform asset tracing analysis;

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 and Hays have 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 Sixth 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 Sixth Interim Fee Application in the amount of \$22,102.52;
- (b) That the Receiver's Retained Professionals be awarded fees incurred during the Sixth Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$54,378.68; Hays for \$4,719.60; and BlockTrace for \$25,848.00.
- (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 SCIFA in the aggregate amount of \$2,862.18, 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 Sixth Certified Interim Fee Application for the Receiver and His Retained Professionals and authorizing the Receiver to immediately pay the fees requested in the SCIFA as follows: (1) to the Receiver in the amount of \$22,102.52; (2) to Shook Hardy & Bacon, LLC for \$54,378.68; (3) to Hays for \$4,719.60; and (4) to BlockTrace for \$25,848.00.

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 \$2,862.18.

Dated: May 17, 2024

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Poston E. Pritchett

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***Counsel for John Lewis, Jr.
Court-Appointed Receiver***

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he has conferred with counsel for Plaintiff United States Securities and Exchange Commission (“SEC”), 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 17th day of May, 2024, 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
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AND EXCHANGE COMMISSION
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/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: 3060868
Invoice Date: 04/05/2024
Matter Number: 33206.393697
Billing Attorney: John Lewis Jr.

Summary of Invoice

For Professional services and disbursements thru **March 31, 2024**

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

Current Fees	\$22,102.50
Total Amount Due	\$22,102.50

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 March 31, 2024 may not be reflected herein.



33206.393697 3060868 04/05/2024

Invoice Detail

For Professional services and disbursements thru *March 31, 2024*

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC02 Asset Disposition				
03/05/24	JLJ	Attention to post closing issues related to sale of Waller county property. Attention to other issues including monthly Benvenuto stipend, media inquiries, status of crypto forensic work.	1.80	\$945.00
Subtotal for SEC02 Asset Disposition			1.80	\$945.00
SEC03 Business Operations				
03/21/24	JLJ	Attention to banking, review and reconcile current statements. Review and authorize wire transfers pursuant to court orders.	1.60	\$840.00
Subtotal for SEC03 Business Operations			1.60	\$840.00
SEC04 Case Admin				
01/02/24	JLJ	Review of call log summary of victim outreach. Attention to proposed functionality of claims database. Emails with team on updates on pending workstreams and outstanding subpoenas.	1.50	\$787.50
01/03/24	JLJ	Catch up on emails of ongoing activity during holiday break.	1.80	945.00
01/08/24	JLJ	Detailed review of vendor mock up of claims process. Follow questions to vendor.	1.30	682.50
01/10/24	JLJ	Call with journalist regarding ongoing fraud allegations.	0.60	315.00
01/11/24	JLJ	Brief update on crypto tracing efforts. Call from claimant lawyer regarding status.	0.80	420.00
01/17/24	JLJ	Review status of pending action items with P. Pritchett. Skim supporting documents for [REDACTED].	2.20	1,155.00
01/23/24	JLJ	Discussion and outlining of issues for next quarterly report. Review of mock up of website claims functionality.	1.30	682.50
01/23/24	JLJ	Emails and pro forma review in preparation of upcoming fee .	1.50	No Charge
01/25/24	JLJ	Review application packet and status report for filing.	1.00	525.00
01/29/24	JLJ	Skim draft filing and financial statements. Team	1.80	945.00



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		huddle to discuss potential offensive litigation, claims against insiders, quarterly report draft and exchanges regarding liquidation of vehicle.		
01/29/24	JLJ	Call with Telemundo reporter regarding ongoing fraud in Illinois.	0.40	210.00
01/30/24	JLJ	Final review of outbound filings. Review updated demand elements of [REDACTED]	1.50	787.50
02/01/24	JLJ	Huddle regarding response to government subpoena and status of forensic work on surface tablet.	0.80	420.00
02/14/24	JLJ	Review notes regarding negotiations with Burford regarding surrender of fee retainer and prior agreements reached with S. Themeli. Email exchanges regarding same.	1.50	787.50
02/14/24	JLJ	Review outline of potential talking points for media outreach and questions.	1.20	630.00
02/22/24	JLJ	Review of motion for order of judgment re Benvenuto. Review status of ongoing claims assessments and demands.	0.50	262.50
02/23/24	JLJ	Confer with media on a recorded public serve announcement regarding ongoing fraud. Review and offer adjustment to claims form. Bank statement reviews and reconciliation.	1.60	840.00
03/04/24	JLJ	Various emails regarding multiple workstreams including Burford fee dispute,	1.20	630.00
03/11/24	JLJ	Strategic team call to analyze cost benefit of continued pursuit of third party claims [REDACTED]	3.80	1,995.00
03/12/24	JLJ	Detail review of various open issues in receivership. Focus on [REDACTED]	2.80	1,470.00
03/15/24	JLJ	Detailed quarterly review of [REDACTED]	5.50	2,887.50
Subtotal for SEC04	Case Admin		34.60	\$17,377.50
SEC08	Business Analysis			
02/02/24	JLJ	Consideration of economic of pursuing claims against leaders and other third parties. Skim interview and deposition transcripts regarding factual record regarding same.	1.60	\$840.00
Subtotal for SEC08	Business Analysis		1.60	\$840.00
SEC12	Litigation Consulting			
02/08/24	JLJ	Consultation with Hardin firm regarding potential contingency fee on putative class claim. Discussion	1.80	\$945.00



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of the merits of the claims.

03/25/24	JLJ	Analysis of issues with team in preparation of upcoming quarterly report filings. Analysis and assessment of potential offensive claims, potential Hardin firm engagement as special counsel and status of claims submission functionality on receiver website.	2.20	1,155.00
Subtotal for SEC12		Litigation Consulting	4.00	\$2,100.00
Total			43.60	\$22,102.50

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	42.10	\$525.00	\$22,102.50
Total Fees		42.10		\$22,102.50

Total Amount Due**\$22,102.50**

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: 3060867
Invoice Date: 04/05/2024
Matter Number: 33206.389768
Billing Attorney: John Lewis Jr.

Summary of Invoice

For Professional services and disbursements thru **March 31, 2024**

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

Current Fees	\$51,516.50
Current Disbursements	2,862.18
Total Amount Due	<hr/> \$54,378.68

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 March 31, 2024 may not be reflected herein.



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Invoice DetailFor Professional services and disbursements thru *March 31, 2024*

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC01 Asset Analysis				
01/17/24	PEP	Review data regarding nano ledger.	0.20	\$85.00
01/17/24	PEP	Analyze various records and recordings related to [REDACTED]	0.70	297.50
01/22/24	PEP	Analyze lis pendens to identify potential other assets,	0.20	85.00
01/29/24	PEP	Follow up regarding status of 2022 BMW X6.	0.20	85.00
03/11/24	CMG	Develop strategy for lawsuit against PLS.	0.60	255.00
Subtotal for SEC01 Asset Analysis			1.90	\$807.50
SEC04 Case Admin				
01/03/24	PEP	Confer with victim.	0.30	\$127.50
01/04/24	PEP	Confer with victim.	0.20	85.00
01/04/24	PEP	Analyze status of [REDACTED].	0.20	85.00
01/05/24	YKR	Review and analyze documents pertaining to Ismael Sanchez to determine level of financial involvement at CFX as relevant to potential asset recovery.	1.90	807.50
01/05/24	YKR	Review and analyze financial records produced by [REDACTED]	1.70	722.50
01/05/24	YKR	Review and analyze deposition transcript of [REDACTED]	1.80	765.00
01/05/24	YKR	Draft summary and analysis regarding likelihood of recovering receivership assets based on review of financial documents produced by Gloria Castaneda.	0.80	340.00
01/05/24	YKR	Review and analyze financial documents and leader spreadsheet produced by Gloria Castaneda to assist with potential asset recovery.	1.80	765.00
01/10/24	YKR	Draft summary and analysis of likely culpability and recovery to receiver for CFX leader Gabriel Ochoa based on review and summary of financial documents.	1.30	552.50
01/10/24	YKR	Draft summary and analysis of likely culpability and recovery to receiver for CFX leader Dulce Ochoa based on review and summary of financial documents.	0.90	382.50
01/10/24	YKR	Draft summary and analysis of [REDACTED]	1.70	722.50



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		[REDACTED] of financial documents belonging to Angelica Vargas.		
01/12/24	PEP	Attend to agenda for upcoming call and review status of various items before same.	0.60	255.00
01/12/24	CAU	Correspond with supervisor Poston regarding call with RQ.	0.20	85.00
01/17/24	PEP	Review most recent account information in light of requests from J. Harris.	0.20	85.00
02/12/24	YKR	Review and analyze financial statements to Ebenezer Construction, Inc. in order to draft demand letter to same.	1.30	552.50
02/12/24	YKR	Review and analyze [REDACTED]	0.70	297.50
02/12/24	YKR	Draft demand letter to [REDACTED]	1.20	510.00
02/12/24	YKR	Create chart tracking purported [REDACTED]	2.00	850.00
02/12/24	YKR	Discuss litigation status and claim submission process with P. Pritchett and J. Lewis.	0.50	212.50
02/12/24	YKR	Review deposition of [REDACTED]	0.80	340.00
02/13/24	YKR	Draft proposed order granting fifth interim fee application.	0.60	No Charge
02/14/24	YKR	Review and revise fifth fee application for filing.	1.90	No Charge
02/14/24	YKR	Prepare exhibits to fifth interim fee application and prepare for filing.	0.60	No Charge
02/15/24	PEP	Review communications from [REDACTED]	0.20	85.00
02/15/24	YKR	Continue drafting demand letter to [REDACTED]	1.30	552.50
02/15/24	YKR	Revise lis pendens tracker to include dates of lis pendens notice filings.	1.50	637.50
02/21/24	PEP	Consider requests related to news appearance.	0.20	85.00
02/22/24	PEP	Attention to Buford Perry fee request.	0.40	170.00
02/23/24	PEP	Multiple communications with Brent Perry regarding attorneys' fees and analysis of same.	0.90	382.50
02/26/24	PEP	Prepare for and participate in status call.	0.20	85.00
02/29/24	YKR	Revise demand letter to [REDACTED]	0.60	255.00
02/29/24	YKR	Review demand letter for [REDACTED]	0.50	212.50
02/29/24	YKR	Finalize demand letter to [REDACTED]	0.30	127.50
02/29/24	YKR	Revise demand letter to [REDACTED]	0.60	255.00
03/01/24	YKR	Continue drafting demand letter to [REDACTED]	0.60	255.00
03/01/24	YKR	Revise demand letter to [REDACTED].	0.50	212.50
03/05/24	YKR	Review case file in order to prepare response to questions submitted by Illinois attorney general.	0.70	297.50



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03/05/24	YKR	Draft response to inquiry from Illinois attorney general in preparation for call with same.	0.40	170.00
03/11/24	YKR	Correspond with S. Askue and J. Lewis regarding answers to inquiry from Illinois attorney general.	0.30	127.50
03/11/24	YKR	Call with J. Olyyan and P. Pritchett regarding Illinois state case against CryptoFX Defendants.	0.90	382.50
03/11/24	YKR	Call with P. Pritchett and J. Lewis regarding status of receivership proceedings.	0.60	255.00
03/11/24	YKR	Draft demand letter to [REDACTED]	1.00	425.00
03/11/24	PEP	Participate in status call regarding various outstanding items.	0.60	255.00
03/11/24	PEP	Analyze status of various items in advance of status call.	0.20	85.00
03/25/24	PEP	Follow up with KCC regarding status of claims portal.	0.20	85.00
03/28/24	PEP	Attention to communications from Plateau Wildlife Management.	0.20	85.00
Subtotal for SEC04 Case Admin			36.10	\$14,025.00

SEC05 Claims Admin

01/02/24	PEP	Follow up with S. Askue and L. Fern regarding claims administration.	0.20	\$85.00
01/04/24	PEP	Confer with vendor regarding capabilities for claims disbursement.	0.50	212.50
01/08/24	PEP	Revise proposed claim submission forms.	0.90	382.50
01/17/24	PEP	Follow up with S. Askue regarding comments to claims administration.	0.20	85.00
01/24/24	PEP	Confer with S. Askue regarding revisions to claim submission form.	0.50	212.50
01/24/24	PEP	Incorporate revisions into proof of claim form per communications with S. Askue.	0.80	340.00
Subtotal for SEC05 Claims Admin			3.10	\$1,317.50

SEC10 Data Analysis

01/10/24	LWP	Provide matter-specific database, document and case team support	0.30	\$54.00
02/01/24	LWP	Provide matter-specific database, document and case team support	2.00	360.00
03/18/24	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third party.	0.50	90.00
Subtotal for SEC10 Data Analysis			2.80	\$504.00

SEC11 Status Reports

01/17/24	YKR	Draft receiver's fifth interim fee application as required by order appointing receiver.	1.70	No Charge
01/17/24	YKR	Draft receiver's fifth interim status report as required by order appointing receivership.	2.00	No Charge



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01/17/24	YKR	Draft section in receiver's fifth certified interim fee application containing summary of receiver's actions during application period.	1.30	No Charge
01/18/24	PEP	Attention to fee applications.	0.30	No Charge
01/19/24	PEP	Fee Application.	0.20	No Charge
01/19/24	PEP	Analyze request from SEC and follow up with S. Askue regarding same.	0.20	85.00
01/19/24	YKR	Revise draft fee application to incorporate updated invoices from Hays and final closing statement of Mack Washington property sale.	0.80	No Charge
01/22/24	YKR	Revise fifth fee application to incorporate updated fund accounting report received from S. Askue.	2.10	No Charge
01/22/24	YKR	Revise fifth fee application to include updated schedule of receipt and disbursement for application period.	1.70	No Charge
01/23/24	PEP	Attention to review of invoices and fee bills for inclusion in fee application and attend to culling of certain line items.	0.50	No Charge
01/25/24	PEP	Further attention to fee application and supporting material.	0.40	No Charge
01/29/24	PEP	Attention to reviewing invoices for redaction and fee application.	0.60	No Charge
01/29/24	PEP	Attention to fee applications and invoices.	0.60	No Charge
01/29/24	PEP	Revise status report.	0.60	255.00
01/29/24	YKR	Revise receiver's fifth fee application per comments from receivership team.	1.00	No Charge
01/29/24	YKR	Revise receiver's fifth status report to include updated invoices, receipts and disbursements provided by S. Askue.	2.30	No Charge
01/30/24	PEP	Final attention to status report and associated exhibits.	0.40	170.00
01/30/24	PEP	Confer with M. Gulde regarding fee application.	0.20	No Charge
02/13/24	PEP	Fee Application.	0.40	No Charge
03/25/24	PEP	Participate in status reports.	0.70	297.50
Subtotal for SEC11	Status Reports		18.00	\$807.50

SEC12 Litigation Consulting

01/03/24	MJM	Research re: negligence, fraud, RICO, DTPA and misrepresentation claims.	1.90	\$807.50
01/05/24	MJM	Research re: negligence, fraud, RICO, DTPA and misrepresentation claims.	2.30	977.50
01/08/24	PEP	Review status of analysis of PLS claims.	0.20	85.00
01/08/24	PEP	Final review of material for [REDACTED].	0.40	170.00
01/11/24	PEP	Consider information related to [REDACTED].	0.30	127.50
01/15/24	MJM	Strategy and research re: private right of action against PLS on behalf of victims.	3.90	1,657.50
01/16/24	MJM	Strategy and research re: private right of action against PLS on behalf of victims including state law claims and federal statutes.	3.90	1,657.50
01/17/24	MJM	Strategy and research re: private right of action	2.90	1,232.50



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01/31/24	PEP	Receive communication from [REDACTED]	0.40	170.00
01/31/24	MJM	Strategy and research re: private right of action including meeting with prospective law firm partner.	3.10	1,317.50
02/01/24	MJM	Correspondence re: FBI hard drives	0.20	85.00
02/01/24	MJM	Correspondence re: PLS fact issues	0.50	212.50
02/02/24	MJM	Strategy and research re: claims against PLS including but not limited to DTPA, RICO, Gross Negligence, Common law fraud and intentional misrepresentation and developing complaint using facts of this case.	3.90	1,657.50
02/02/24	MJM	Discussion with Aisha at Rusty Hardin's firm re: partnering on case to bring claims against PLS.	0.80	340.00
02/05/24	MJM	Setting up meeting with Rusty Hardin's firm to discuss partnering on case.	0.20	85.00
02/08/24	PEP	Confer with R. Higgins and A. Dennis regarding claims against PLS.	0.50	212.50
02/15/24	MJM	Research and correspond re: Buford Perry's request for attorney's fees including searching files and searching docket from 1.5 years ago.	0.90	382.50
02/17/24	MJM	Correspond with Aisha re: data received from subpoena of PLS.	0.90	382.50
02/21/24	MJM	Research and correspond re: Perry attorney's fees.	0.60	255.00
02/21/24	MJM	Discussion and correspondence re: attorney's fees request for defense counsel including clawing back a portion of the funds and speaking with former Shook attorney to confirm if there was a verbal agreement with Perry.	0.60	255.00
02/22/24	MJM	Conversation with former Shook attorney re: Perry attorney's fees and confirmation there was no verbal agreement for a specific amount, or that fees submission would be approved, further research in Netdocs, for agreement, on docket for approval and with LAA who were assigned the case to further clarify information on prior agreement.	0.90	382.50
02/22/24	MJM	Review attorney fee request and edit based on capped rates and discount and send draft email re: response to defense counsel re: fees.	1.10	467.50
02/23/24	MJM	Correspond with former Shook attorney re: attorney's fees for defense counsel.	0.10	42.50
02/26/24	MJM	Read email re: [REDACTED].	0.10	42.50
03/04/24	MJM	Talk to Aisha about fee arrangement and recovery structure.	0.50	212.50
03/05/24	MJM	Meeting with Aisha re: PLS complaint to review additional evidence.	1.00	425.00
03/06/24	PEP	Attend to inquiry from [REDACTED].	0.20	85.00
03/06/24	MJM	Correspond with team about new attorney who reached out and needs to be respond to, and Illinois office pursuing entities.	0.30	127.50
03/07/24	MJM	Draft demand letter for [REDACTED]	3.90	1,657.50



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known address, Casa de Alabanza's addresses which are multiple entities in multiple states and any registered agents or board members we could send demand letters to.

03/11/24	MJM	Continue research on	3.90	1,657.50
03/11/24	MJM	Discuss	0.50	212.50
03/12/24	MJM	Discuss with Aisha about fees.	0.80	340.00
03/13/24	PEP	Analyze demand letter and additional questions regarding	0.30	127.50
03/13/24	MJM	Correspond with Mia and Yara re: documents to help send demand letters and documents re: case against PLS.	0.90	382.50
03/15/24	MJM	Review complaint filed in a related matter and adjust strategy for recovery accordingly.	1.50	637.50
03/20/24	MJM	Prepare and mail	2.50	1,062.50
03/26/24	MJM	Work with team to run conflicts check on defendants in related complaint and add other parties to conflicts check.	0.60	255.00
03/27/24	MJM	Read email re: conflicts check.	0.10	42.50
Subtotal for SEC12 Litigation Consulting			47.60	\$20,230.00

SEC13 Litigation

01/02/24	PEP	Respond to inquiry from J. Olaya regarding document production.	0.60	\$255.00
01/02/24	MKF	Perform searches regarding	1.50	585.00
01/08/24	PEP	Review status of research into	0.20	85.00
01/08/24	PEP	Further attention to cold wallet storage and identity of same.	0.20	85.00
01/11/24	PEP	Confer with IL SEC J. Olaya regarding upcoming hearing.	0.20	85.00
01/12/24	PEP	Confer with J. Harris regarding status of	0.20	85.00
01/12/24	PEP	Confer with victim M. Saladino.	0.20	85.00
01/17/24	PEP	Confer with John Lewis Jr. regarding status of various litigation items.	0.40	170.00
01/17/24	PEP	Analyze email summary of strategy for claims against PLS.	0.30	127.50
01/17/24	PEP	Strategy call with SEC regarding individual	0.40	170.00



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		defendants.		
01/17/24	PEP	Confer with M. Gulde regarding [REDACTED]	0.20	85.00
01/17/24	PEP	Finalize and deliver demand letter to [REDACTED].	0.20	85.00
01/17/24	PEP	Further attention and follow up to various outstanding items regarding individual debtors.	0.40	170.00
01/19/24	PEP	Confer with SEC regarding particular individuals and follow up with S. Askue and review of file in order to respond to same.	1.50	637.50
01/19/24	PEP	Further attention to request from SEC.	0.30	127.50
01/19/24	PEP	Review S. Askue notes responding to request from SEC.	0.20	85.00
01/22/24	PEP	Confer with M. Mitchell regarding concerns related to PLS analysis.	0.30	127.50
01/22/24	PEP	Further review of claims submission process.	0.20	85.00
01/24/24	PEP	Confer with M. Gulde regarding [REDACTED].	0.20	85.00
01/26/24	PEP	Review prior work up of claims against [REDACTED].	0.40	170.00
01/26/24	PEP	Review file for prior work up of [REDACTED]	0.50	212.50
01/29/24	PEP	Prepare for and participate in weekly status call.	0.60	255.00
01/29/24	PEP	Review inquiry from J. Olaya and referred source docs for purposes of respond to same.	0.20	85.00
01/29/24	PEP	Respond to inquiry from FBI.	0.20	85.00
01/30/24	PEP	Confer with J. Hale regarding status of investigation.	0.80	340.00
01/31/24	PEP	Review documents from [REDACTED]	0.30	127.50
02/01/24	PEP	Review information related to [REDACTED]	0.30	127.50
02/01/24	PEP	Review inquiry from [REDACTED]	0.20	85.00
02/01/24	PEP	Summarize additional research needed for [REDACTED].	0.20	85.00
02/01/24	PEP	Confer with J. Norwood regarding A. Vargas.	0.30	127.50
02/01/24	PEP	Review status of document collection and prior production for purposes of producing documents at request of J. Hale.	3.00	1,275.00
02/01/24	PEP	Summarize document collection and date for production to FBI based on conversation with J. Hale.	0.70	297.50
02/01/24	PEP	Confer with M. Gulder regarding document productions and scope of same.	0.50	212.50
02/01/24	PEP	Confirm documents from J. Olaya are in Receiver possession and respond to same.	0.20	85.00
02/01/24	MKF	Preparation of materials to be added to the Receiver's website.	2.50	975.00
02/02/24	PEP	Analyze questions from M. Mitchell regarding PLS.	0.20	85.00
02/02/24	PEP	Review updated research regarding PLS.	0.20	85.00
02/05/24	PEP	Review responses to inquiry [REDACTED].	0.20	85.00
02/06/24	PEP	Confer with J. Hale and follow up regarding productions to him.	0.40	170.00
02/06/24	PEP	Review most recent document uploads to Relativity.	0.40	170.00
02/12/24	PEP	Participate in bi-weekly status call.	0.50	212.50



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02/12/24	PEP	Review action items in advance of status call.	0.30	127.50
02/12/24	MKF	Perform searches regarding [REDACTED].	2.00	780.00
02/16/24	PEP	Follow up with [REDACTED].	0.20	85.00
02/22/24	PEP	Confer with [REDACTED].	0.40	170.00
02/22/24	MKF	Preparation of materials to be added to the Receiver's website.	2.50	975.00
02/26/24	PEP	Revise demand letter to [REDACTED].	0.20	85.00
02/26/24	PEP	Review bifurcated judgment entered by court.	0.20	85.00
02/26/24	PEP	Analyze demand letter and supporting information for [REDACTED].	0.30	127.50
02/29/24	PEP	Final review of demands to [REDACTED].	0.20	85.00
03/01/24	PEP	Attention [REDACTED].	0.20	85.00
03/11/24	PEP	Prepare for and participate in call with ILSEC regarding discovery.	1.00	425.00
03/11/24	PEP	Draft follow up of action items from call with ILSEC.	0.20	85.00
03/11/24	MKF	Perform searches regarding Illinois key sales agents, sponsors and leaders.	1.00	390.00
03/11/24	MKF	Attendance at bi-weekly strategy meeting.	0.50	195.00
03/15/24	PEP	Cursory review of most recent Complaint from SEC.	0.20	85.00
03/18/24	PEP	Further review of new complaint, associated filings and any action items associated with same.	0.50	212.50
03/22/24	MKF	Preparation of [REDACTED].	2.50	975.00
03/25/24	PEP	Consider request to produce salesforce data from J. Olaya.	0.20	85.00
03/25/24	MKF	Attendance at bi-weekly strategy meeting.	0.50	195.00
Subtotal for SEC13 Litigation			33.60	\$13,825.00
Total			143.10	\$51,516.50

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
CMG	Caroline M. Gieser	0.60	\$425.00	\$255.00
MJM	Megan J Mitchell	45.30	425.00	19,252.50
PEP	Poston E. Pritchett	33.80	425.00	14,365.00
YKR	Yara K. Rashad	28.20	425.00	11,985.00
CAU	Cesar A. Udave	0.20	425.00	85.00
MKF	Mia K. Fleming	13.00	390.00	5,070.00



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Initials	Name	Hours	Rate	Amount
LWP	Levi W. Percy	2.80	180.00	504.00
Total Fees		123.90		\$51,516.50

Disbursements

Date	Description	Amount
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Expense Code: E106

03/31/24	Legal Database Searches Accurint	\$21.18
Subtotal for E106		\$21.18

Expense Code: E108

02/10/24	Special Postage	\$19.92
02/22/24	Special Postage	40.80
02/27/24	Special Postage	29.88
02/27/24	Special Postage	4.44
03/22/24	Special Postage	116.16
Subtotal for E108		\$211.20

Expense Code: E118

01/31/24	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for January 2024, related to SEC v. Mauricio Chavez, et al.	\$1,277.40
02/29/24	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for February 2024, related to SEC v. Mauricio Chavez, et al.	1,352.40
Subtotal for E118		\$2,629.80

Total Disbursements	\$2,862.18
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Current Disbursements	2,862.18
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Total Amount Due	\$54,378.68
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Exhibit C

Hays Financial Consulting, LLC

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 1/1/2024 to 3/31/2024

April 15, 2024

Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting	2.20	607.20
Asset Analysis & Recovery	0.20	55.20
Business Analysis	6.60	1,821.60
Claims Administration & Objections	8.00	2,208.00
Fee / Employment Applications & Objection	1.10	NO CHARGE
Tax Issues	0.10	27.60
For professional services rendered	18.20	\$4,719.60

Hays Financial Consulting, LLC

2964 Peachtree Road
 Suite 555
 Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 1/1/2024 to 3/31/2024

April 15, 2024

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
James R. Jennings, CPA	0.10	27.60
	276.00/hr	
Scott S. Askue	18.10	4,692.00
	259.23/hr	
For professional services rendered	18.20	\$4,719.60

Hays Financial Consulting, LLC

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 1/1/2024 to 3/31/2024

April 15, 2024

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Accounting</u>			
1/19/2024	SSA Prepared SFAR, asset recovery analysis and sources and uses report for fee application.	1.60 276.00/hr	441.60
3/20/2024	SSA Prepared allocation of wire transfers for payment of professional fees.	0.60 276.00/hr	165.60
	Subtotal	2.20	607.20
<u>Asset Analysis & Recovery</u>			
1/29/2024	SSA Researched and drafted email to Poston Pritchett regarding status of BMW.	0.20 276.00/hr	55.20
	Subtotal	0.20	55.20
<u>Business Analysis</u>			
1/19/2024	SSA Telephone conference with Jill Harris and Poston Pritchett regarding transactions and funds raised by leaders. Reviewed for available information in determining investors and funds raised by leaders and method for calculation of same. Drafted email on findings.	5.50 276.00/hr	1,518.00
2/1/2024	SSA Reviewed and responded to email from Poston Pritchett regarding leaders and possible reports on same. Reviewed for available information.	1.10 276.00/hr	303.60
	Subtotal	6.60	1,821.60
<u>Claims Administration & Objections</u>			
1/4/2024	SSA Telephone conference with Poston Prichett and Lisa Ferm regarding claims process.	0.60 276.00/hr	165.60
1/5/2024	SSA Prepared report of contact information for claimants. Tested and merged data from Salesforce to simplify claims process.	3.60 276.00/hr	993.60
1/24/2024	SSA Reviewed claim form and noted changes to same. Telephone call to Poston Pritchett regarding same.	1.60 276.00/hr	441.60
2/8/2024	SSA Updated and formatted claim form.	2.20 276.00/hr	607.20
	Subtotal	8.00	2,208.00

SEC v CryptoFX

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Fee / Employment Applications & Objection</u>			
1/18/2024	SSA	Reviewed and edited fee invoice for period ending 12/31/23.	
		1.10 276.00/hr	NO CHARGE
		Subtotal	0.00
<u>Tax Issues</u>			
2/3/2024	JRJ	Reviewed 2023 cash activity for filing 2023 tax returns.	
		0.10 276.00/hr	27.60
		Subtotal	27.60
		For professional services rendered	\$4,719.60
		18.20	

Exhibit D

BLOCKTRACE, LLC

1320 Arrow Point Dr Ste 501 #TW83
 Cedar Park, TX 78613
 +1 5122228145
 sales@blocktrace.com
 www.blocktrace.com



INVOICE

BILL TO

Receiver John Lewis
 SEC vs. CryptoFX

SHIP TO

Receiver John Lewis
 SEC vs. CryptoFX

INVOICE

1109

DATE

02/01/2024

TERMS

Due on receipt

DUE DATE

02/01/2024

Remit to:

BLOCKTRACE, LLC
Shaun MaGruder
1320 Arrow Point Dr
Suite 501 #TW83
Cedar Park, TX 78613

Area	Hours	Amount
Data Analysis	71.8	\$25,848.00
	71.8	\$25,848.00

Name	Hours	Rate	Amount
James Daniels	25.3	\$360.00	\$9,108.00
Julio Castro	6.4	\$360.00	\$2,304.00
Kevin Duberstein	40.1	\$360.00	\$14,436.00
Professional Services Rendered	71.8		\$25,848.00

BALANCE DUE

\$25,848.00

Data Analysis

<u>Date</u>	<u>Person</u>	<u>Detail</u>	<u>Hours</u>	<u>Amount</u>
04/02/23	JD	Email from Hays regarding investors making investments via BTC; Conducted initial trace of investor deposit	0.7	\$252.00
04/03/23	JD	Reviewed report and made format, revisions, and document citing updates	2.3	\$828.00

04/05/23	KD	Graph analysis of 32bbC, tracing outflows to locate the BTC endpoints	0.9	\$324.00
04/05/23	KD	Graph analysis of 34de8, tracing outflows to locate the BTC endpoints	1.6	\$576.00
04/06/23	KD	Continue tracing and graphing 34de8, tracing outflows to locate attributable address for subpoena service	1.3	\$468.00
04/07/23	KD	Finalizing graphing of 35Wxx, 35rR7 to locate attributable address for subpoena service	2.1	\$756.00
04/07/23	KD	Finalize graphing 34TxV to locate attributable address for subpoena service	1.6	\$576.00
04/07/23	KD	Start initial tracing and graphing 36Cdm to locate attributable address for subpoena service	1.2	\$432.00
04/07/23	KD	Finalized graphing 3Hive, 3HmvK, and 3J2bA	1.8	\$648.00
04/10/23	KD	Finalize graphing 36Cdm and 36DXH to locate attributable address for subpoena service	2.7	\$972.00
04/10/23	KD	Created graph and initial tracing transactions from 37LjU, locating possible attribution addresses for follow up subpoenas	2.2	\$792.00
04/10/23	JD	Reviewed report and made format, revisions, and document citing updates	1.2	\$432.00
04/11/23	KD	Compiled wordlist used by Ledger, forwarded to J. Daniels for a keyword list search of documents that may contain the recovery phrase	0.7	\$252.00
04/11/23	JD	Add additional addresses to address index	1.2	\$432.00
04/12/23	KD	Finalized graphing of 34Txv, 31fokN, and 37W9o to locate attributable address for subpoena service	2.6	\$936.00
04/12/23	KD	Finalized graphing of 38e3J, 39WyU, and 38SjQ, to locate attributable addresses for subpoena service	2.8	\$1,008.00
04/12/23	KD	Review and respond to S. Askue emails	0.6	\$216.00
04/12/23	JD	Update master payment index spreadsheet with newly graphed transactions	2.2	\$792.00
04/13/23	KD	Finalized graphing 3Aom, and combined it into 38SjQ	2.1	\$756.00
04/13/23	JC	Traced transactions and added to graph for 0d7a	1.8	\$648.00
04/13/23	KD	Compiled list of high value addresses for subpoena service and emailed to Hays Consulting	0.8	\$288.00
04/13/23	JC	Created summary information for report for 0d7a	1.6	\$576.00

04/14/23	JC	Traced and created graph for 0d7a	1.6	\$576.00
04/14/23	JC	Wrote summary narrative for report for address 0d7a	1.4	\$504.00
04/14/23	KD	Complete graphing of cryptocurrency address 14wT3 and added additional attribution addresses	2.4	\$864.00
04/18/23	KD	Modifications to report add data tables and additional graphed cryptocurrency addresses 38e3J, 39WyU, and 38SjQ	1.6	\$576.00
04/18/23	JD	Reviewed report and made format, revisions, and document citing updates	1.4	\$504.00
04/18/23	JD	Researched and responded to email from Hays regarding BTC owned by CyptoFX coming into Coinbase account 59e52fb6ffe09203563d33fb	1.6	\$576.00
04/19/23	JD	Researched, modified and responded to email from Hays regarding modifications report exhibit	2.2	\$792.00
04/20/23	JD	Researched and responded to email from Hays regarding cryptocurrency calculaitons in report	1.2	\$432.00
04/21/23	JD	Researched and responded to email from Hays regarding Chavez Wallet	0.8	\$288.00
04/27/23	JD	Created "Executive Summary" of report to identify the main areas identified in the report	2.2	\$792.00
04/27/23	JD	Research and responded to emails from Hays regarding cryptocurrency transations with identified entities who need to be subpoenaed	1.6	\$576.00
05/01/23	JD	Emails from Hays regarding cryptocurrency transations for Roberto Zavala- 323Ja and 33CXt; Documented in master list; Initial tracing of addresses	2.3	\$828.00
05/02/23	JD	Analyze and report on KOT4X and Blockchair wallets	2.7	\$972.00
05/03/23	JD	Research and responded to emails from Hays regarding cryptocurrency transations with Switchchain	1.7	\$612.00
06/05/23	KD	Created cryptocurrency address list for Hayes Consulting/SEC	0.2	\$72.00
10/13/23	KD	Search documents for Promoters and crypto addresses, compile spreadsheet of findings and send to Poston.	1.2	\$432.00
10/16/23	KD	Trace BTC out of 1d8g address to Coinswitch 125C6, Binance addresses 14g2Z6, 14hQu, 1LxwA,14XQg, 1Ead7, 1GB8m, 1LeiW	1.7	\$612.00

10/17/23	KD	Trace BTC out of 1d8g address to Coinswitch addresses 19MKdP, 1Ggnuw, 1L1Zu, 1NUoH, Coinbase addresses 34gssb, 3FViN, 3KwLg, bc1qwxu9, 3Lawf, Binance addresses 14XsB, 1GB117, KOT4X address 3AgoA, HitBTC address 3P2Qu	2.3	\$828.00
11/22/23	KD	Trace BTC out of 1d8g address to Binance addresses 1Hh9kX, 1HGyo, 1KK1d, 1GBzK, 1CKWs, 1Gaxp, 1KJt2K, Coinbase addresses 3EMC2, 37BS, 3CUN1, 353ib, 3CkGt, 3QfeG, 3Lo5E, 326V4, Blockchain.com address 3Gz2Ts, FX choice address 3P2Qu, unknown entity addresses bc1q3, 1MgvM, 1NM6, Bittrex address 1HXwC,	3.6	\$1,296.00
11/27/23	KD	Trace BTC out of 1d8g address to Binance addresses 18MBh, 1GvsP, 1Ezp9, 1GaXT, Unknown entity address bc1qck, Coinbase addresses 3KHJR, 36T9h, 3BBbo, 3569d, 39wCKy, 3H24D, 3GYqC, 3BMxZ, KuCoin address 33aa6. Prepare email to client with findings, recommendations, and request for additional hours to complete request.	2.1	\$756.00
Subtotal Data Analysis			71.8	\$25,848.00
Total			71.8	\$25,848.00

Exhibit E

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 01/01/2024 to 03/31/2024

FUND ACCOUNTING (See Instructions:)				
Line	Description	Detail (for Current Period)	Subtotal (From Prior Period)	Grand Total (All Periods)
Line 1	Beginning Balance	\$3,500,809.71		\$0.00
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 3	Cash and Securities	\$0.00	\$3,479,325.73	\$3,479,325.73
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$0.00	\$1,160,105.27	\$1,160,105.27
Line 6	Personal Asset Liquidation	\$0.00	\$89,529.93	\$89,529.93
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>\$3,500,809.71</i>		<i>\$5,256,308.13</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	Disbursements to Receiver or Other Professionals	\$84,100.23	\$1,491,457.27	\$1,575,557.50
Line 10b	Business Asset Expenses	\$0.00	\$9,007.60	\$9,007.60
Line 10c	Personal Asset Expenses (Includes monthly budget for Defendant)	\$18,000.00	\$255,033.55	\$273,033.55
Line 10d	Investment Expenses	\$0.00	\$0.00	\$0.00
Line 10e	Third-Party Litigation Expenses			
	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	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.00
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursements for Receivership Operations	\$102,100.23	\$1,755,498.42	\$1,857,598.65
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	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	Distribution Plan Implementation Expenses			
	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	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$0.00	\$0.00	\$0.00
Line 12b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursement to Court/Other:	\$0.00	\$0.00	\$0.00
	Total Funds Disbursed (Line 9-11):	\$102,100.23	\$1,755,498.42	\$1,857,598.65
Line 13	Ending Balance (As of 6/30/2023):	\$3,398,709.48		\$3,398,709.48

Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	\$3,398,709.48	\$0.00	\$3,398,709.48
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	\$3,398,709.48	\$0.00	\$3,398,709.48

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)

(printed name)

(title)

Date: _____

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

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
vs.	§	
	§	CIVIL ACTION NO. 4:22-CV-03359
MAURICIO CHAVEZ, GIORGIO	§	
BENVENUTO and CryptoFX, LLC,	§	JUDGE ANDREW S. HANEN
	§	
<i>Defendants.</i>	§	
	§	
CBT Group, LLC,	§	
	§	
<i>Relief Defendant.</i>	§	

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

On May 17, 2024, counsel for John Lewis, Jr., the Court-appointed Receiver for Mauricio Chavez (“Chavez”), Giorgio Benvenuto (“Benvenuto”), CryptoFX, LLC (“CryptoFX”), and CBT Group, LLC (“CBT”) (collectively, the “Receivership Defendants”), filed an Application Authorizing Payment of Receiver’s Sixth Certified Interim Fee Application (“FCIFA”), which seeks approval of the fees incurred by the Receiver and the Receiver’s Retained Professionals from January 1, 2024 to March 31, 2024 (the “Application Period”).

Pursuant to the Receivership Order, paragraph 58, the Receiver served a copy of the proposed FCIFA, together with all exhibits and billing information, to counsel for the SEC. Receiver and counsel for the SEC have conferred regarding the Receiver’s FCIFA, 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 Sixth Certified Interim Fee Application. Accordingly, the Court finds and determines as follows:

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

(b) The Receiver be conditionally awarded fees incurred during the Sixth Interim Fee Application in the amount of \$22,102.52; it is further ordered that

(c) The Receiver's Retained Professionals be awarded fees incurred during the Sixth Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$54,378.68; Hays Financial Consulting, LLC for \$4,719.60; BlockTrace, LLC, \$25,848.00; it is further ordered that

(d) 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 the FCIFA in the aggregate amount of \$9,217.63 are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

IT IS SO ORDERED this ____ day of _____, 2024.

JUDGE ANDREW S. HANEN
UNITED STATES DISTRICT JUDGE