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

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
VS.	§	
	§	
MAURICIO CHAVEZ, GIORGIO	ş	CIVIL ACTION NO. 4:22-CV-03359
BENVENUTO and CryptoFX, LLC,	ş	
	ş	JUDGE ANDREW S. HANEN
Defendants.	ş	
	ş	
CBT Group, LLC,	ş	
-	ş	
Relief Defendant.	§	
Kenej Dejenaani.	8	

RECEIVER'S EIGHTH 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 Eighth Certified Interim Fee Application, showing the Court as follows:

SUMMARY OF FEE REQUEST

1. This Eighth Certified Interim Fee Application ("SCIFA") covers the period from July 1, 2024 to September 30, 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 Eighth 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). On May 17, 2024, the Receiver filed his sixth certified fee application covering the period from January 1, 2024 to March 31, 2024, which was granted by the Court on May 21, 2024 (Doc. No. 119). On August 19, 2024, the Receiver filed his seventh certified fee application covering the period from July 1, 2024 to September 30, 2024, of which the order approving the fee application is still pending by the Court.

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: \$24,805.00 Shook, Hardy & Bacon L.L.P. ("SHB") (*see* SHB Invoice attached as **Exhibit A**); \$2,621.00 Hays

Financial Consulting, LLC ("Hays") (*see* Hays Invoice attached as **Exhibit B**). Further, SHB's fees have been reduced by \$7,990.00.¹

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 Shook Hardy and Bacon, LLP in the amount of \$24,805.00; and to Hays in the amount of \$2,621.00. 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 \$5,900.26.

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. <u>Cash on Hand</u>: The Receivership Estate has \$3,255,660.98 deposited in four trust accounts named for each of the Defendants as of the end of the Application Period (September 30, 2024). 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

¹ The Receiver, John Lewis Jr., did not have any professional fees during this quarter.

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); (xli) proceeds from liquidating 2022 BMW X6 M501 (\$74,000).

8. All four Receivership trust accounts are held with Webster Bank, N.A., a whollyowned 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. <u>Other Assets:</u> In addition to the cash on hand listed above, as of the end of the Application Period (September 30, 2024) the Receiver has on hand the following assets:

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

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.

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. <u>Expenses</u>: The Receiver and his team have incurred administrative expenses in the amount of \$5,900.26 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$5,900.26 were advanced by SHB.

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13. <u>Investor/Creditor Claims:</u> 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. <u>Receiver Claims</u>: 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 \P 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.

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

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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 \P 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.* \P 60.

23. 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 A**. 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's Counsel, Shook, Hardy & Bacon L.L.P. Fees and Expenses for Application Period

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
60.3	See Ex. A	\$24,805.00	\$5,900.26	\$30,705.26

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

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
10.10	See Ex. B	\$2,597.60	\$23.40	\$2,621.00

26. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$30,705.26 for the Application Period. The Receiver asks the Court to approve payments to Hays in the amount of \$2,621.00 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 5 Counsel, Shook, Hardy & Dacon E.E.I.				
Task Description	Hours Worked	Total Fees		
Asset Analysis	12.30	\$5,227.50		
Asset Disposition	2.40	\$1,020.00		
Case Administration	19.40	\$7,730.50		
Claims Administration	4.00	\$1,700		
Status Reports	18.80	\$0		
Litigation Consulting	12.00	\$5,100.00		
Litigation	10.20	\$4,027.00		

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

Receiver's Accountant, Hays Financial Consulting, LLC			
Task Description	Hours Worked	Total Fees	
Accounting	1.70	\$469.20	
Business Analysis	2.00	\$552.00	
Case Administration	0.20	\$72.40	
Claims Administration &	1.00	\$276.00	
Objections			
Data Analysis	1.90	\$567.40	
Fee/ Employment	1.00	NO CHARGE	
Applications & Objection			
Tax Issues	2.30	\$660.60	

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. <u>Time and Labor Required</u>: The Receiver's 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 SHB 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 Hays in connection with the administration of the Receivership.

a. <u>Novelty and Difficulty of Questions Presented</u>: The Services performed involved

issues of varying complexity, as set forth in substantial detail in the billing statements attached to this Application.

b. <u>Skill Requisite to Perform Professional Services:</u> 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. <u>Preclusion of Other Employment Due to Acceptance of the Cases</u>: The Receiver and his team devoted time and resources to this case to the possible preclusion of involvement in other matters.

d. <u>Customary Fees for the Type of Services Rendered</u>: 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, SHB's fees have been reduced by \$7,990.00. SHB's expenses are billed with no mark-up added.

f. <u>Whether the Fee is Fixed or Contingent</u>: 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. <u>Time Limitations Imposed by the Client or Other Circumstances</u>: 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. <u>The Amount Involved and Results Obtained</u>: 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;
- 1. Preparing the Receiver's Eighth Interim Status Report;
- m. Reviewing records received from third parties to perform asset tracing analysis;
- n. Coordinating as necessary with government agencies;
- o. Conferencing with potential Intervenor to obtain resolution of that Motion;

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- p. Meeting with LA victims
- q. Conferring regarding stipend to Benvenuto;

i. <u>The Experience, Reputation, and Ability of the Professional</u>: The Receiver and his team have extensive experience in receivership, bankruptcy, and litigation matters.

j. <u>Undesirability of the Case</u>: This factor is inapplicable to the present case.

k. <u>Nature and Length of Professional Relationship with the Client</u>: SHB and Hays have worked with the Receiver prior to being retained in these proceedings and maintains an ongoing relationship.

l. <u>Awards in Similar Cases</u>: 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 Eighth 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's Retained Professionals be awarded fees incurred during the Eighth Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$24,805.00; and Hays for \$2,621.00.
- (b) 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 \$5,900.26, 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 Eighth 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 Shook Hardy & Bacon, LLC for \$30,705.26; and (2) to Hays for \$2,621.00.

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 \$5,900.26.

Dated: November 19, 2024

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Poston E. Pritchett

Poston E. Pritchett Texas Bar No. 24088258 SHOOK, HARDY & BACON L.L.P. 2555 Grand Blvd. Kansas City, MO 64108 Telephone: 816.474-6550 ppritchett@shb.com

Megan J. Mitchell Texas Bar No. 24108103 S.D. Tex. Bar No. 3435473 mjmitchell@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 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 19th day of November, 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 **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

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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



Shook, Hardy & Bacon L.L.P. 2555 Grand Boulevard Kansas City, MO 64108-2613

SHOOK HARDY AND BACON JOHN LEWIS, JR, RECEIVER 600 TRAVIS ST, SUITE 3400 HOUSTON, TX 77002-2926 Invoice No: Invoice Date: Matter Number: Billing Attorney: **3095605** 10/29/2024 33206.389768 John Lewis Jr.

Summary of Invoice For Professional services and disbursements thru September 30, 2024

(816) 474-6550

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

Current Fees	\$24,805.00
Current Disbursements	5,900.26
Total Current Fees and Disbursements	\$30,705.26
Previous Balance	32,640.29
Total Amount Due	\$63,345.55

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 September 30, 2024 may not be reflected herein.



33206.389768 3095605 10/29/2024

Invoice Detail

For Professional services and disbursements thru September 30, 2024

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC01	Asset An	alysis		
08/06/24	MJM	Taking inventory of multiple storage areas and developing liquidation plan.	0.50	\$212.50
08/07/24	MJM	Taking inventory of multiple storage areas and developing liquidation plan.	0.50	212.50
08/08/24	MJM	Developing liquidation plan for items from storage room.	0.20	85.00
09/04/24	MJM	Strategy re: accounting related to request from SEC.	1.50	637.50
09/05/24	MJM	Video research, production of still images from videos and database search for sensitive information.	1.90	807.50
09/06/24	MJM	Video research, production of still images from videos and database search for sensitive information.	1.40	595.00
09/09/24	MJM	Emails re requested information from SEC.	0.70	297.50
09/10/24	MJM	Correspondence re: recordings and databases.	0.50	212.50
09/11/24	MJM	Emails re: requested information from SEC.	1.10	467.50
09/12/24	MJM	Emails re: requested information from SEC	0.50	212.50
09/12/24	MJM	Reviewing dozens of video clips for	2.50	1,062.50
09/16/24	MJM	Emails re: requested information from SEC	0.50	212.50
09/23/24	MJM	Strategy meeting re: videos	0.50	212.50
Subtotal	for SEC01	Asset Analysis	12.30	\$5,227.50

SEC02 Asset Disposition

08/15/24	MJM	Taking inventory of remaining items in two locations at office.	0.30	\$127.50
09/19/24	MJM	Response to request from	0.30	127.50
09/19/24	MJM	Meeting with	1.10	467.50
09/23/24	MJM	Correspondence re: distribution of assets.	0.40	170.00
09/24/24	MJM	Correspondence re: BlockTrace.	0.10	42.50
09/26/24	MJM	Correspondence re: BMW check.	0.20	85.00
Subtotal 1	for SEC02	Asset Disposition	2.40	\$1,020.00

Case Admin SEC04

07/01/24	PEP	Review status of long lead action items.	0.20	\$85.00
07/01/24	YKR	Correspond with	0.50	212.50



33206.389768 3095605 10/29/2024

07/02/24	PEP	Confer with victim.	0.20	85.00
07/12/24	PEP	Communications to intervenor regarding receivership and collection of information.	0.20	85.00
07/15/24	PEP	Review status of pending items.	0.20	85.00
07/22/24	PEP	Follow up with regard to action items for pursuing	0.20	85.00
		remaining assets and claims process.		
07/29/24	PEP	Strategy session regarding action items.	0.50	212.50
07/30/24	PEP	Consider and respond to SEC regarding updates.	0.30	127.50
08/08/24	MJM	Meeting with LA community organizers re: future	0.50	212.50
		discussion with LA victims.		
08/08/24	PEP	Confer with Haven Services regarding potential	0.70	297.50
		meeting with California victims.		
08/12/24	PEP	Participate in strategy call.	0.40	170.00
08/13/24	MJM	Discussion re: case updates	0.40	170.00
08/16/24	PEP	Consider request from government and strategy for responding to same.	0.20	85.00
08/19/24	PEP	Confer with SEC Matt Gulde regarding various items.	0.40	170.00
08/20/24	PEP	Review status of payments to Benvenuto and	0.40	170.00
		communicate with his counsel regarding same.		
08/21/24	PEP	Prepare for and participate in zoom call with Santa	2.00	850.00
		Monica victims.		
08/21/24	PEP	Outline talking points for zoom with California victims.	0.80	340.00
08/22/24	PEP	Confer with various third-parties regarding status of investigation and records for review.	0.40	170.00
08/23/24	PEP	Confer with D. Cogdell regarding Benvenuto stipend.	0.20	85.00
08/26/24	PEP	ATtention to request from SEC.	0.40	170.00
08/27/24	PEP	Attention to inquiries from various stakeholders.	0.40	170.00
08/30/24	PEP	Respond to inquiry from SEC.	0.20	85.00
09/04/24	LWP	Coordinate with vendor regarding extraction of	0.30	54.00
		videos from encrypted DVR.		
09/04/24	PEP	Further attention to request from	0.40	170.00
09/09/24	PEP	Review status of various outstanding items.	0.50	212.50
09/09/24	PEP	Analyze information from accountant regarding valuations.	0.60	255.00
09/09/24	CMG	Team meeting to revise strategy for preparation of distribution of funds to victims.	0.40	170.00
09/09/24	PEP	Follow up communications with	0.20	85.00
09/10/24	PEP	Attention to stipend for Benvenuto.	0.20	85.00
09/11/24	PEP	Further attention to requests from	0.40	170.00
09/11/24	PEP	Further attention to requests for information	1.00	425.00
09/11/24	PEP	Confer with	0.40	170.00
09/11/24	LWP	Provide matter-specific database, document and case team support	0.80	144.00
09/12/24	LWP	Provide matter-specific database, document and	1.00	180.00



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4.00

\$1,700.00

		case team support		
09/12/24	PEP	Further attention to production of information in	0.30	127.50
		response to		
09/16/24	PEP	Attention to additional requests from SEC.	0.20	85.00
09/17/24	PEP	Confer with	0.20	85.00
09/18/24	PEP	Attention to inquiry from	0.20	85.00
09/19/24	PEP	Follow up attention to call from	0.20	85.00
09/19/24	PEP	Conference call	0.50	212.50
09/23/24	PEP	Review asset reports and respond to	0.20	85.00
09/23/24	PEP	Attention to status of action items and status of	0.50	212.50
		responses to various inquiries from government		
		agencies.		
09/24/24	PEP	Review prior work product and communications from	0.80	340.00
		BlockTrace.		
09/25/24	PEP	Analyze Form 2s.	0.20	85.00
09/26/24	PEP	Conference with victim.	0.20	85.00
Subtotal	for SEC04	Case Admin	19.40	\$7,730.50
SEC05	Claims A	dmin		
SEC05				
07/01/24	PEP	Attention to status of action items.	0.30	\$127.50
07/10/24	PEP	Confer with victim.	0.20	85.00
07/17/24	PEP	Follow up with L. Ferm regarding claims database.	0.20	85.00
07/18/24	PEP	Consider response from L. Ferm regarding claims	0.20	85.00
		database.		
		dalabase.		
08/08/24	PEP		1.50	637.50
08/08/24	PEP	Prepare for and participate in call with Verita regarding claims portal.	1.50	637.50
08/08/24	PEP PEP	Prepare for and participate in call with Verita	1.50 0.20	
		Prepare for and participate in call with Verita regarding claims portal.		
		Prepare for and participate in call with Verita regarding claims portal. Follow up with counsel for Benvenuto regarding		85.00
08/28/24	PEP	Prepare for and participate in call with Verita regarding claims portal. Follow up with counsel for Benvenuto regarding cessation of stipend.	0.20	637.50 85.00 85.00
08/28/24	PEP	Prepare for and participate in call with Verita regarding claims portal. Follow up with counsel for Benvenuto regarding cessation of stipend. Attention to text for communications to possible	0.20	85.00

SEC11 **Status Reports**

Subtotal for SEC05 Claims Admin

07/22/24	PEP	[No charge] Attention to issues for upcoming Fee Application.	0.40	No Charge
07/22/24	PEP	[No charge] Respond to inquiries from accounting for purposes of reconciling amount due for upcoming fee application.	0.30	No Charge
07/29/24	PEP	[No charge] Respond to questions regarding prior fee applications.	0.20	No Charge
07/30/24	PEP	[No charge] Review updated accounting files and revise status report, including communications regarding same.	1.50	No Charge
07/30/24	MJM	[No charge] Request from third parties re: status report, final edits and file status report.	1.90	No Charge
07/30/24	MJM	[No charge] Prepare status report.	3.50	No Charge
08/02/24	MJM	[No charge] Begin drafting fee application.	1.80	No Charge
08/05/24	MJM	[No charge] Continue drafting fee application.	1.10	No Charge
08/07/24	MJM	[No charge] Continue drafting fee application.	2.80	No Charge



08/08/24 MJM	[No charge] Continue drafting fee application including edit re: footnote.	0.50	No Charge
08/08/24 PEP	[No charge] Attention to fee application.	0.40	No Charge
08/12/24 CMG	[No charge] Develop strategy for upcoming required reporting.	0.30	No Charge
08/14/24 MJM	[No charge] Final edits to fee application including preparing exhibits.	1.50	No Charge
08/14/24 PEP	[No charge] Attention to fee application.	0.40	No Charge
08/19/24 MJM	[No charge] Prepare fee app and exhibits for filing and file.	1.10	No Charge
08/20/24 PEP	[No charge] Analyze proposed order for submission.	0.20	No Charge
08/20/24 MJM	[No charge] Prepare fee app order, review with LAA to ensure no discrepancies and prepare for filing.	0.90	No Charge
Subtotal for SEC11	Status Reports	18.80	\$0.00

SEC12 Litigation Consulting

07/01/24	MJM	Meeting re: case updates.	0.50	\$212.50
07/02/24	MJM		0.30	127.50
07/15/24	MJM	Correspond re: case update.	0.10	42.50
07/19/24	MJM	Correspondence re: filing response and order for	0.20	85.00
		Motion to Intervene		
07/19/24	MJM	Second phone call with filer of Motion to Intervene.	0.10	42.50
07/19/24	MJM	Phone call with filer of Motion to Intervene.	0.10	42.50
07/19/24	MJM	Correspond internally re: filer of Motion to Intervene.	0.20	85.00
07/29/24	MJM	Meeting re: case updates.	0.50	212.50
07/30/24	MJM	Research and analysis re: Robert Zavala.	0.50	212.50
08/01/24	MJM	Correspondence re: LA victims presentation.	0.20	85.00
08/01/24	MJM	Meeting with Poston and SEC re: case updates.	0.80	340.00
08/01/24	MJM	Prepare for meeting with Poston and SEC re: case	0.80	340.00
		updates.		
08/01/24	MJM	Strategic analysis re: Robert Zavala and status of	0.30	127.50
		documents requested from interview.		
08/05/24	MJM	Correspondence re: LA victims meeting	0.20	85.00
08/12/24	MJM	Strategy call re: case updates	0.50	212.50
08/21/24	MJM	Strategy re: presentation to LA investors	0.30	127.50
08/21/24	MJM	Correspondence re: presentation to LA investors	0.10	42.50
08/21/24	MJM	Presentation to LA investors re: claims process,	1.50	637.50
		case status and functions of governmental entities.		
08/26/24	MJM	Analysis re: information requested from SEC.	2.40	1,020.00
08/27/24	MJM	Analysis re: information requested from SEC.	0.80	340.00
08/28/24	MJM	Analysis re: information requested from SEC.	0.30	127.50
08/30/24	MJM	Analysis re: information requested from SEC.	1.30	552.50
Subtotal 1	for SEC12	Litigation Consulting	12.00	\$5,100.00

SEC13 Litigation

07/01/24	MKF	Attendance at bi-weekly strategy meeting.	0.30	\$117.00
07/02/24	PEP	Consider status of negotiations with	0.20	85.00
07/10/24	PEP		0.20	85.00



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07/12/24 PEP	Analyze response to motion to intervene.	0.30	127.50
07/19/24 PEP	Strategy regarding intervention.	0.20	85.00
07/22/24 MKF	Preparation of materials to be added to the	0.50	195.00
	Receiver's website.		
08/08/24 MKF	Perform Relativity searches regarding R. Zavala.	2.00	780.00
08/12/24 PEP	Review Zavala information.	0.50	212.50
08/26/24 MKF	Perform searches regarding the interviews of S.	2.50	975.00
	Aguado, G. Castaneda, C. Mezomo, I. Sanchez, R.		
	Teran and S. Varela.		
09/06/24 MKF	Perform Relativity searches regarding production	2.50	975.00
	statistics.		
09/18/24 MKF	Perform searches regarding	1.00	390.00
Subtotal for SEC13	Litigation	10.20	\$4,027.00
Total		79.10	\$24,805.00

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
PEP	Poston E. Pritchett	20.90	\$425.00	\$8,882.50
CMG	Caroline M. Gieser	0.40	425.00	170.00
MJM	Megan J Mitchell	27.60	425.00	11,730.00
YKR	Yara K. Rashad	0.50	425.00	212.50
MKF	Mia K. Fleming	8.80	390.00	3,432.00
LWP	Levi W. Percy	2.10	180.00	378.00
Total Fee	es	60.30		\$24,805.00

Disbursements

Date	Description	Amount
Expense	Code: E113	
07/30/24	Veritext - Service of Subpoena Veritext, Professional services, January 23, 2023.	\$127.75
Subtotal	for E113	\$127.75
Expense	Code: E118	
07/31/24	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for July 2024, related to SEC vs. Mauricio Chavez, et a	\$1,427.48
08/31/24	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for the month of August 2024, related to SEC vs. Mauricio Chavez, et al	1,427.48



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Date	Description		Amount
09/30/24	•		2,917.55
Subtotal f	or E118	· · · · · · · · · · · · · · · · · · ·	\$5,772.51
Total Disb	oursements		\$5,900.26
	Current	Disbursements	5,900.26
	Total Cu	urrent Fees and Disbursements	\$30,705.26
	Previous	Balance	32,640.29
	Total Ar	mount Due	\$63,345.55

Document 127-2 Filed on 11/19/24 in TXSD Page 1 of 5 Hays Financial Consulting, LLC

2964 Peachtree Road Suite 555 Atlanta, GA 30305-2153

SEC v CryptoFX John Lewis, Receiver

For the Period from 7/1/2024 to 9/30/2024

October 31, 2024

Professional Services

	Hours	Amount
Accounting Business Analysis Case Administration Claims Administration & Objections Data Analysis Fee / Employment Applications & Objection	1.70 2.00 0.20 1.00 1.90 1.00	72.40 276.00 567.40 NO CHARGE
Tax Issues For professional services rendered	2.30 10.10	660.60 \$2,597.60
Additional Charges :		
Postage		23.40
Total costs		\$23.40
Total amount of this bill	_	\$2,621.00

2964 Peachtree Road Suite 555 Atlanta, GA 30305-2153

SEC v CryptoFX John Lewis, Receiver

For the Period from 7/1/2024 to 9/30/2024

October 31, 2024

Professional Services

	Hrs/Rate	Amount
James R. Jennings, CPA	1.50 276.00/hr	414.00
S. Gregory Hays, CTP, CIRA	1.00 362.00/hr	362.00
Scott S. Askue	7.60 239.68/hr	1,821.60
For professional services rendered	10.10	\$2,597.60
Additional Charges :		
Postage		23.40
Total costs		\$23.40
Total amount of this bill	-	\$2,621.00

Document 127-2 Filed on 11/19/24 in TXSD Page 3 of 5 Hays Financial Consulting, LLC

2964 Peachtree Road Suite 555 Atlanta, GA 30305-2153

SEC v CryptoFX John Lewis, Receiver

For the Period from 7/1/2024 to 9/30/2024

October 31, 2024

Professional Services

		Hrs/Rate	Amount
<u>Acc</u>	counting		
9/26/2024 SSA	Reviewed receiver account ledgers for deposits of funds.	0.20 276.00/hr	55.20
7/22/2024 SSA		0.60 276.00/hr	165.60
7/30/2024 SSA		0.90 276.00/hr	248.40
	Subtotal	1.70	469.20
Bus	siness Analysis		
8/6/2024 SSA	Researched for information relating to commissions earned and paid to Roberto Zavala. Drafted email to Poston Prichett regarding same.	1.80 276.00/hr	496.80
8/26/2024 SSA		0.20 276.00/hr	55.20
	Subtotal	2.00	552.00
Cas	se Administration		
7/30/2024 SGH	Reviewed seventh status report.	0.20 362.00/hr	72.40
	Subtotal	0.20	72.40
<u>Cla</u>	ims Administration & Objections		
8/8/2024 SSA	Reviewed and prepared for video conference with Poston Pritchett and Lisa Ferm regarding claims web site and issues for same.	1.00 276.00/hr	276.00
	Subtotal	1.00	276.00
Dat	a Analysis		
9/4/2024 SSA	Reviewed, researched and responded to email from	0.30	82.80
9/9/2024 SGH	Poston Pritchett regarding Salesforce data. Researched the report I prepared in 2022 of the total funds raised by CFX. Email to Poston Pritchett and Scott Askue regarding my analysis.	276.00/hr 0.50 362.00/hr	181.00

SEC v CryptoFX		Pa	ige 2
		Hrs/Rate	Amount
9/9/2024 SSA	Researched for information relating to total losses and determination of same. Discussed same with Greg Hays. Drafted email to Poston Pritchett regarding same.	1.10 276.00/hr	303.60
	Subtotal	1.90	567.40
Fee	e / Employment Applications & Objection		
7/30/2024 SSA	Prepared fee invoice for the quarter ending 6/30/2024.	1.00 276.00/hr	NO CHARGE
	Subtotal	1.00	0.00
<u>Tax</u>	Issues		
7/2/2024 JRJ	Finalized and processed 2023 CBT Federal and Texas partnership returns.	1.50 276.00/hr	414.00
7/9/2024 SGH	Text message to John Lewis regarding filing the tax return.	0.30 362.00/hr	108.60
7/10/2024 SSA	Prepared 2023 tax filing for transmission to the Trustee. Drafted email regarding same.	0.50 276.00/hr	138.00
	Subtotal	2.30	660.60
For	professional services rendered	10.10	\$2,597.60

SEC v CryptoFX	Page	3
Additional Charges :		
		Amount
Expenses		
7/10/2024 Postage for CBT Group, LLC 8/27/2024 Postage for CBT Group, LLC per Jim Jennings expense report.		11.70 11.70
Subtotal		23.40
Total costs		\$23.40
Total amount of this bill		\$2,621.00

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 07/01/2024 to 09/30/2024

		<u>Detail (for Current</u> <u>Period)</u>	<u>Subtotal (From</u> <u>Prior Period)</u>	<u>Grand Tota</u> (All Periods
line 1	Beginning Balance	\$3,380,709.48		\$0.0
	Increases in Fund Balance:			
ine 2	Business Income	\$0.00	\$0.00	\$0.0
ine 3	Cash and Securities	\$0.00	\$3,479,325.73	\$3,479,325.7
.ine 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.0
ine 5	Business Asset Liquidation	\$0.00	\$1,160,105.27	\$1,160,105.2
ine 6	Personal Asset Liquidation	\$0.00	\$89,529.93	\$89,529.
ine 7	Third-Party Litigation Income	\$0.00	\$0.00	\$0.
ine 8	Miscellaneous - Other (Attorney Escrows)	\$0.00	\$527,347.20	\$527,347.
	Total Funds Available (Lines 1-8)	\$3,380,709.48		\$5,256,308.1
	Decreases in Fund Balance:			
ine 9	Disbursements to Investors	\$0.00	\$0.00	\$0.
ine 10	Disbursements for Receivership Operations			
	Disbursements to Receiver or Other Professionals	\$107,048.50	\$1,575,557.50	\$1,682,606.
	Business Asset Expenses	\$0.00	\$9,007.60	\$9,007.
Line 10c	Personal Asset Expenses (Includes monthly budget for Defendant(\$18,000.00	\$291,033.55	\$309,033.
Line 10d	Investment Expenses	\$0.00	\$0.00	\$0.
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees	\$0.00	\$0.00	\$0.
	2. Litigation Expenses	\$0.00	\$0.00	\$0.
	Total Third-Party Litigation Expenses	\$0.00	\$0.00	\$0.0
Line 10f	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.
	Total Disbursements for Receivership Operations	\$125,048.50	\$1,875,598.65	\$2,000,647.
ine 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses: 1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0. \$0.
	Distribution Agent	\$0.00	\$0.00	\$0. \$0.
	Consultants	\$0.00	\$0.00	\$0. \$0.
		\$0.00	-	
	Legal Advisers		\$0.00	\$0.
	Tax Advisers	\$0.00	\$0.00	\$0.
	2. Administrative Expenses	\$0.00	\$0.00	\$0. ©0
	3. Miscellaneous	\$0.00	\$0.00	\$0.
Line 11h	Total Plan Development Expenses Distribution Plan Implementation Expenses	\$0.00	\$0.00	\$0.
Line 110	1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.
	IDC	\$0.00	\$0.00	\$0.
	Distribution Agent	\$0.00	\$0.00	\$0.
	Consultants	\$0.00	\$0.00	\$0
	Legal Advisers	\$0.00	\$0.00	\$0.
	Tax Advisers	\$0.00	\$0.00	\$0.
	2. Administrative Expenses	\$0.00	\$0.00	\$0.
	3. Investor Identification			• •
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.
	Claimant Identification	\$0.00	\$0.00	\$0.
	Claims Processing	\$0.00	\$0.00	\$0
	Web Site Maintenance/Call Center	\$0.00	\$0.00	\$0.
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0
	5. Miscellaneous	\$0.00	\$0.00	\$0 \$0
	6. Federal Account for Investor Restitution	\$0.00	\$0.00	\$0.
	(FAIR) Reporting Expenses	\$0.00	\$0.00	\$ 0.
	Total Plan Implementation Expenses	\$0.00	\$0.00	\$0.
	Total Disbursements for Distribution Expenses Paid by the Fu		φ0.00	ψ0.
ine 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment	\$0.00	\$0.00	\$0
	System (CRIS) Fees			
Line 12b	Federal Tax Payments	\$0.00	\$0.00	\$0
2010 120	Total Disbursement to Court/Other:	\$0.00	\$0.00	\$0
	Total Funds Disbursed (Line 9-11):	\$125,048.50	\$1,875,598.65	\$2,000,647
	Ending Balance (As of 9/30/2024):	\$3,255,660.98	22,070,090.00	\$3,255,660

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Line 14	Ending Balance of Fund - Net Assets:	\$2.255 ((0.00	\$0.00	\$2.255.CC0.00
Line 14a	Cash & Cash Equivalents	\$3,255,660.98	\$0.00	\$3,255,660.98
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	\$3,255,660.98	\$0.00	\$3,255,660.98
OTHER SUPP	LEMENTAL INFORMATION:			
OTHERSOTT		Detail	Subtotal	Grand Total
	Report of Items NOT To Be Paid by the Fund:			
Line 15	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 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				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: