



2. This is the Ninth 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 April 1, 2024 to June 30, 2024, which was granted by the Court on January 17, 2025. On November 19, 2024, the Receiver filed his eighth certified fee application covering the period from July 1, 2024 to September 30, 2024, which was granted by the Court on January 17, 2025.

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: \$24,662.50 Shook, Hardy & Bacon L.L.P. (“SHB”) (*see* SHB Invoice attached as **Exhibit A**); \$2,352.90 Hays

Financial Consulting, LLC (“Hays”) (*see* Hays Invoice attached as **Exhibit B**). Further, SHB’s fees have been reduced by \$5,865.00.<sup>1</sup>

4. The Receiver served a copy of this NCIFA, together with all exhibits and billing information to counsel for the SEC. The Receiver and counsel for the SEC have conferred about the NCIFA 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 NCIFA as follows: to Shook Hardy and Bacon, LLP in the amount of \$24,662.50; and to Hays in the amount of \$2,352.90. 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 \$5,865.00.

#### **STANDARDIZED FUND ACCOUNTING REPORT**

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

#### **CASE STATUS**

7. Cash on Hand: The Receivership Estate has \$3,323,660.98 deposited in four trust accounts named for each of the Defendants as of the end of the Application Period (December 31, 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

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

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

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, 2024) the Receiver has on hand the following assets:

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

10. 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.

11. Expenses: The Receiver and his team have incurred administrative expenses in the amount of \$2,882.67 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$2,882.67 were advanced by SHB.

12. 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.

13. 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.

14. Receiver Claims: The Receiver's investigation of claims against third parties is ongoing. 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 may have substantial causes of action against these third parties.

15. Additionally, because the Ponzi scheme was primarily a cash-based scheme, the Receiver continues to weigh the causes of actions it may have against the significant forensic and/or investigatory resources necessary 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.

16. 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.

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

### FEE APPLICATION

18. 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).

19. 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.

20. 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.

21. The flat hourly billing rate of the Receiver is \$525.00.

22. 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.

23. 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**

<b>Hours</b>	<b>Hourly Rates</b>	<b>Total Fees</b>	<b>Total Expenses</b>	<b>Fees and Expenses</b>
60.3	<i>See Ex. A</i>	\$24,662.50	\$2,882.67	\$27,545.17

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

<b>Hours</b>	<b>Hourly Rates</b>	<b>Total Fees</b>	<b>Total Expenses</b>	<b>Fees and Expenses</b>
10.10	<i>See Ex. B</i>	\$2,352.40	\$00.50	\$2,352.90

24. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$27,545.17 for the Application Period. The Receiver asks the Court to approve payments to Hays in the amount of \$2,352.90 for the Application Period.

25. 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's Counsel, Shook, Hardy & Bacon L.L.P.**

<b>Task Description</b>	<b>Hours Worked</b>	<b>Total Fees</b>
Asset Disposition	15.80	\$6,715.00
Case Administration	22.40	\$6,555.00
Claims Administration	6.30	\$2,677.50
Data Analysis	4.20	\$1,785.00
Status Reports	1.90	\$0
Litigation Consulting	15.90	\$4,420.00
Litigation	6.40	\$2,510.00

**Receiver's Accountant, Hays Financial Consulting, LLC**

<b>Task Description</b>	<b>Hours Worked</b>	<b>Total Fees</b>
Accounting	2.40	\$662.40
Business Analysis	1.90	\$619.00



Case Administration	0.70	\$219.00
Claims Administration & Objections	2.90	\$852.00
Fee/ Employment Applications & Objection	0.80	NO CHARGE

### ARGUMENT AND AUTHORITES IN SUPPORT OF APPLICATION

26. 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.”

27. 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:

28. Time and Labor Required: 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. 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, SHB's fees have been reduced by \$5,865.00. 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. Corresponding with third parties to identify potential receivership assets;
- f. Reviewing CryptoFX and CBT business records obtained from investors or in response to third-party subpoenas;
- g. Analyzing company records to evaluate potential claims against third parties;
- h. Managing a Relativity database in order to store and review company documents.
- i. Conducting public records searches and related due diligence to affiliated parties, entities, and other potential relief defendants;
- j. Preparing the Receiver's Ninth Interim Status Report;
- k. 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;

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.

29. Each of these tasks detailed in the Receiver's Ninth 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**

30. The Receiver and counsel for the SEC have conferred regarding the Receiver's NCIFA 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.

31. 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 \$27,545.17; and Hays for \$2,352.90.
- (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 NCIFA in the aggregate amount of \$5,865.00, are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

### **CONCLUSION**

32. Based on the foregoing, the Receiver respectfully requests that the Court enter an order approving the Receiver's Ninth Certified Interim Fee Application for the Receiver and His Retained Professionals and authorizing the Receiver to immediately pay the fees requested in the NCIFA as follows: (1) to Shook Hardy & Bacon, LLC for \$27,545.17; and (2) to Hays for \$2,352.90.

33. 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 \$5,865.00.

Dated: March 5, 2025

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 5<sup>th</sup> day of March, 2025, 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.

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*Counsel for Defendant Giorgio Benvenuto*

/s/ Poston E. Pritchett  
Poston E. Pritchett

# **Exhibit A**





**Shook, Hardy & Bacon L.L.P.**  
2555 Grand Boulevard  
Kansas City, MO 64108-2613  
(816) 474-6550

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

**Invoice No:** 3109136  
**Invoice Date:** 01/24/2025  
**Matter Number:** 33206.389768  
**Billing Attorney:** John Lewis Jr.

**Summary of Invoice**

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

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

Current Fees	\$24,662.50
Current Disbursements	2,882.67
<b>Total Current Fees and Disbursements</b>	<b>\$27,545.17</b>
Previous Balance	63,345.55
<b>Total Amount Due</b>	<b>\$90,890.72</b>

**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 December 31, 2024 may not be reflected herein.



33206.389768 3109136 01/24/2025

## Invoice Detail

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

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

### Professional Services

Date	Attorney	Description	Hours	Amount
<b>SEC02 Asset Disposition</b>				
10/02/24	MJM	Discussion re: check for BMW	0.90	\$382.50
10/07/24	MJM	Review over one hundred [REDACTED]	1.10	467.50
10/09/24	MJM	Review over one hundred [REDACTED]	2.50	1,062.50
10/11/24	MJM	Review over one hundred [REDACTED]	2.10	892.50
10/11/24	MJM	Discussion re: BMW check	0.10	42.50
10/14/24	MJM	Review over one hundred [REDACTED]	1.50	637.50
10/15/24	MJM	Continue review over one hundred [REDACTED]	1.90	807.50
10/15/24	MJM	Review over one hundred [REDACTED]	1.50	637.50
10/16/24	MJM	Continue review over one hundred [REDACTED]	2.10	892.50
10/17/24	MJM	Review over one hundred [REDACTED]	0.90	382.50
10/18/24	MJM	Review over one hundred [REDACTED]	0.90	382.50
11/18/24	MJM	Website updates.	0.20	85.00
11/22/24	MJM	Website updates follow-up.	0.10	42.50
<b>Subtotal for SEC02 Asset Disposition</b>			<b>15.80</b>	<b>\$6,715.00</b>
<b>SEC04 Case Admin</b>				
10/04/24	PEP	Call with victim.	0.20	\$85.00
10/21/24	PEP	Prepare for and participate in strategy call.	0.50	212.50
10/24/24	PEP	Communications with [REDACTED] regarding investigation.	0.50	212.50
10/24/24	PEP	Attention to request from [REDACTED].	0.20	85.00
10/25/24	LWP	Provide matter-specific database, document and case team support	0.50	90.00
10/28/24	PEP	Analyze and revise exhibits with an eye towards upcoming reporting.	0.70	297.50
10/29/24	PEP	Analyze status of information [REDACTED].	0.20	85.00
10/31/24	PEP	Draft email to victim.	0.30	127.50



33206.389768 3109136 01/24/2025

11/04/24	PEP	Communicate with vendor regarding claims portal.	0.20	85.00
11/04/24	PEP	Attention to bi-weekly strategy.	0.50	212.50
11/04/24	LWP	Provide matter-specific database, document and case team support	0.50	90.00
11/06/24	PEP	Analyze issues associated with request [REDACTED]	0.40	170.00
11/06/24	MJM	Planning and preparation re: winding down estate.	1.80	765.00
11/07/24	PEP	Review emails from victims.	0.20	85.00
11/11/24	MJM	Planning and preparation re: winding down estate.	1.90	807.50
11/12/24	MJM	Prepare fee application.	1.90	No Charge
11/12/24	MJM	Work with third party on fee application requests.	0.50	No Charge
11/12/24	MJM	Fee application edits and prep exhibits.	1.20	No Charge
11/14/24	MJM	Final edits to eighth fee app.	0.90	No Charge
11/18/24	MJM	Fee app and proposed order filing prep.	1.50	No Charge
11/18/24	MJM	Planning and preparation re: winding down estate.	1.50	637.50
11/18/24	PEP	Prepare for and participate in status conference.	0.50	212.50
11/19/24	PEP	Consider issues attendant to inquiry [REDACTED]	0.20	85.00
11/19/24	MJM	Fee app.	0.20	No Charge
11/19/24	MJM	Planning and preparation re: winding down estate.	1.90	807.50
11/20/24	PEP	Attention to inquiry from [REDACTED] regarding salesforce.	0.70	297.50
11/20/24	MJM	Planning and preparation re: winding down estate.	1.10	467.50
11/20/24	MJM	Fee app.	0.20	No Charge
11/22/24	MJM	Planning and preparation re: winding down estate.	1.50	637.50
<b>Subtotal for SEC04</b>	Case Admin		22.40	\$6,555.00

**SEC05 Claims Admin**

10/22/24	PEP	Confer with potential vendor for claims management.	1.00	\$425.00
11/07/24	PEP	Analyze claims submission portal.	0.40	170.00
11/07/24	JLJ	Presentation from vendor regarding claims agent and claims administration. Review proposed claims process and comments of team.	1.10	467.50
11/08/24	PEP	Revisions to proof of claim.	0.70	297.50
11/13/24	PEP	Provide comments to claims portal questionnaire.	0.20	85.00
11/18/24	JLJ	Review of open claims administration and disgorgement calculations related to same. Team call to analyze and role sort claims portal wrap up pending report and administrative expense application.	2.10	892.50
12/02/24	JLJ	Huddle with team to review progress on building of claims process.	0.60	255.00
12/16/24	PEP	Follow up with L. Ferm regarding additional steps need to open claims portal.	0.20	85.00
<b>Subtotal for SEC05</b>	Claims Admin		6.30	\$2,677.50

**SEC10 Data Analysis**

11/06/24	ALTZ	Telephone conference with [REDACTED] regarding the Salesforce data [REDACTED]	0.40	\$170.00
11/06/24	ALTZ	Analyze Salesforce [REDACTED]	2.30	977.50



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11/06/24	ALTZ	Telephone conference [REDACTED] about the Salesforce data provided.	0.20	85.00
11/06/24	ALTZ	Communicate with Mr. Lewis regarding [REDACTED] the Salesforce data provided.	0.10	42.50
11/14/24	ALTZ	Communicate with Mr. Pritchett regarding the data analysis of the Salesforce data.	0.10	42.50
11/14/24	ALTZ	Communicate with [REDACTED] regarding the data analysis of the Salesforce data.	0.10	42.50
11/20/24	ALTZ	Review the export of Salesforce data in preparation for the conference [REDACTED].	0.40	170.00
11/20/24	ALTZ	Team conference with [REDACTED] regarding the export of Salesforce data.	0.60	255.00
<b>Subtotal for SEC10 Data Analysis</b>			<b>4.20</b>	<b>\$1,785.00</b>

**SEC11 Status Reports**

10/29/24	PEP	Attention to status reports and exhibits.	0.40	No Charge
10/31/24	PEP	Revisions to status report.	0.50	No Charge
11/12/24	PEP	Attention to fee application.	0.40	No Charge
11/14/24	PEP	Attention to fee application.	0.40	No Charge
11/18/24	PEP	Attend to fee application.	0.20	No Charge
<b>Subtotal for SEC11 Status Reports</b>			<b>1.90</b>	<b>\$0.00</b>

**SEC12 Litigation Consulting**

10/07/24	MJM	Meeting re: case updates.	0.40	\$170.00
10/21/24	MJM	Meeting re: case updates.	0.50	212.50
10/24/24	MJM	Discussion with [REDACTED] re: information entity requested and preparation of information.	0.90	382.50
10/25/24	MJM	Preparation for meeting with [REDACTED] re: information entity requested and preparation of information.	1.10	467.50
10/28/24	MJM	Preparation for meeting with [REDACTED] re: information entity requested and preparation of information including summary and analysis, and in person meeting.	2.80	1,190.00
10/29/24	MJM	Prepare information requested from [REDACTED]	0.50	212.50
10/29/24	MJM	Prepare status report.	1.50	No Charge
10/29/24	MJM	Follow up from meeting with [REDACTED] re: information entity requested prior to meeting and additional information requested after meeting.	1.50	637.50
10/30/24	MJM	Prepare status report.	1.50	No Charge
10/31/24	MJM	Prepare and file status report and exhibits.	2.50	No Charge
11/15/24	MJM	Correspondence with [REDACTED] re: requested information, including calls, and documentation request.	1.90	807.50
11/21/24	MJM	Correspondence with [REDACTED] re: requested information	0.80	340.00
<b>Subtotal for SEC12 Litigation Consulting</b>			<b>15.90</b>	<b>\$4,420.00</b>



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**SEC13 Litigation**

Date	Initials	Description	Hours	Rate	Amount
11/05/24	MKF	Perform Relativity searches regarding Daily Reports.	2.50		\$975.00
11/07/24	MKF	Perform searches regarding [REDACTED] and [REDACTED].	1.00		390.00
11/14/24	PEP	Confer with M. Mitchell regarding various issues associated with pending information requests.	0.40		170.00
12/30/24	MKF	Perform Relativity searches regarding document requests.	2.50		975.00
<b>Subtotal for SEC13 Litigation</b>			<b>6.40</b>		<b>\$2,510.00</b>
<b>Total</b>			<b>72.90</b>		<b>\$24,662.50</b>

**Timekeeper Summary**

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	3.80	\$425.00	\$1,615.00
PEP	Poston E. Pritchett	8.20	425.00	3,485.00
ALTZ	Arlen L. Tanner	4.20	425.00	1,785.00
MJM	Megan J Mitchell	35.90	425.00	15,257.50
MKF	Mia K. Fleming	6.00	390.00	2,340.00
LWP	Levi W. Percy	1.00	180.00	180.00
<b>Total Fees</b>		<b>59.10</b>		<b>\$24,662.50</b>

**Disbursements**

Date	Description	Amount
<b>Expense Code: E106</b>		
11/30/24	Pacer	\$1.20
<b>Subtotal for E106</b>		<b>\$1.20</b>
<b>Expense Code: E107</b>		
10/03/24	Delivery-UPS-1Z5140XY0197255608	\$26.37
<b>Subtotal for E107</b>		<b>\$26.37</b>
<b>Expense Code: E118</b>		
11/30/24	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for November 2024, related to SEC v. Mauricio Chavez, et al.	\$1,427.55
12/04/24	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for October 2024, related to SEC vs. Mauricio Chavez, et al	1,427.55
<b>Subtotal for E118</b>		<b>\$2,855.10</b>
<b>Total Disbursements</b>		<b>\$2,882.67</b>

Current Disbursements 2,882.67



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<b>Total Current Fees and Disbursements</b>	<u>\$27,545.17</u>
Previous Balance	<u>63,345.55</u>
<b>Total Amount Due</b>	<u><b>\$90,890.72</b></u>

# **Exhibit B**

**Hays Financial Consulting, LLC**2964 Peachtree Road  
Suite 555  
Atlanta, GA 30305-2153

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**SEC v CryptoFX**  
**John Lewis, Receiver****For the Period from 10/1/2024 to 12/31/2024**

January 23, 2025

## Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting	2.40	662.40
Business Analysis	1.90	619.00
Case Administration	0.70	219.00
Claims Administration & Objections	2.90	852.00
Fee / Employment Applications & Objection	0.80	NO CHARGE
<b>For professional services rendered</b>	<b>8.70</b>	<b>\$2,352.40</b>
Additional Charges :		
Pacer Charges		0.50
<b>Total costs</b>		<b>\$0.50</b>
<b>Total amount of this bill</b>		<b>\$2,352.90</b>



**Hays Financial Consulting, LLC**

2964 Peachtree Road  
 Suite 555  
 Atlanta, GA 30305-2153

**SEC v CryptoFX**  
**John Lewis, Receiver**

**For the Period from 10/1/2024 to 12/31/2024**

January 23, 2025

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
S. Gregory Hays, CTP, CIRA	2.00	724.00
	362.00/hr	
Scott S. Askue	6.70	1,628.40
	243.04/hr	
<b>For professional services rendered</b>	<b>8.70</b>	<b>\$2,352.40</b>
Additional Charges :		
Pacer Charges		0.50
<b>Total costs</b>		<b>\$0.50</b>
<b>Total amount of this bill</b>		<b>\$2,352.90</b>

**Hays Financial Consulting, LLC**

2964 Peachtree Road  
Suite 555  
Atlanta, GA 30305-2153

**SEC v CryptoFX**  
**John Lewis, Receiver**

**For the Period from 10/1/2024 to 12/31/2024**

January 23, 2025

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>Accounting</u></b>				
10/31/2024	SSA	Reviewed bank records. Prepared sources and uses report, SFAR and asset and liquidation report.	2.40 276.00/hr	662.40
		Subtotal	2.40	662.40
<b><u>Business Analysis</u></b>				
11/6/2024	SGH	Reviewed information regarding crypto account of Roberta Zavala. Reviewed reports from Blockchase and Receiver's Fourth Interim Report for information. Drafted email to Scott Askue regarding same.	0.50 362.00/hr	181.00
	SSA	Researched for crypto wallet information for Roberto Zavala.	0.40 276.00/hr	110.40
11/7/2024	SGH	Additional research regarding crypto accounts of Zavala. Searched for any records of crypto account M987. Email to Scott Askue regarding same.	0.60 362.00/hr	217.20
	SSA	Reviewed Zavala interview notes for information regarding crypto wallet.	0.40 276.00/hr	110.40
		Subtotal	1.90	619.00
<b><u>Case Administration</u></b>				
10/24/2024	SSA	Conference call with the SEC regarding case issues.	0.40 276.00/hr	110.40
10/31/2024	SGH	Reviewed status report filed today. Email regarding claims process.	0.30 362.00/hr	108.60
		Subtotal	0.70	219.00
<b><u>Claims Administration &amp; Objections</u></b>				
11/1/2024	SSA	Drafted email to Greg Hays regarding claims process.	0.10 276.00/hr	27.60
11/6/2024	SSA	Reviewed claim portal prepared by Verita.	0.40 276.00/hr	110.40
11/7/2024	SSA	Reviewed claim portal and drafted comments to Poston Pritchett regarding same.	0.50 276.00/hr	138.00
11/8/2024	SGH	Reviewed and edited claim form and drafted email with suggested edits.	0.40 362.00/hr	144.80
	SGH	Reviewed and responded to emails regarding the claim form.	0.20 362.00/hr	72.40
	SSA	Drafted additional notes and comments on claims portal.	1.30 276.00/hr	358.80

**SEC v CryptoFX**

	<u>Hrs/Rate</u>	<u>Amount</u>
Subtotal	2.90	852.00
 <b><u>Fee / Employment Applications &amp; Objection</u></b>		
10/31/2024 SSA Prepared fee invoice.	0.80 276.00/hr	NO CHARGE
Subtotal	0.80	0.00
<b>For professional services rendered</b>	<b>8.70</b>	<b>\$2,352.40</b>

**SEC v CryptoFX**

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Additional Charges :

	<u>Amount</u>
<b><u>Expenses</u></b>	
10/21/2024 Pacer on-line charges	0.50
Subtotal	0.50
<b>Total costs</b>	<b>\$0.50</b>
<b>Total amount of this bill</b>	<b><u><u>\$2,352.90</u></u></b>

# Exhibit C

**STANDARDIZED FUND ACCOUNTING REPORT for**  
**Receivership in SEC v. Mauricio Chavez, Giorgio Benvenuto and Crypto FX, LLC - Cash Basis**  
**Receivership; Civil Court Docket No. 4:22-cv-3359**  
**Reporting Period 10/01/2024 to 12/31/2024**

FUND ACCOUNTING (See Instructions:)				
		<u>Detail (for Current Period)</u>	<u>Subtotal (From Prior Period)</u>	<u>Grand Total (All Periods)</u>
<b>Line 1</b>	<b>Beginning Balance</b>	\$3,255,660.98		\$0.00
	<i>Increases in Fund Balance:</i>			
<b>Line 2</b>	<b>Business Income</b>	\$0.00	\$0.00	\$0.00
<b>Line 3</b>	<b>Cash and Securities</b>	\$0.00	\$3,479,325.73	\$3,479,325.73
<b>Line 4</b>	<b>Interest/Dividends Income</b>	\$0.00	\$0.00	\$0.00
<b>Line 5</b>	<b>Business Asset Liquidation</b>	\$0.00	\$1,160,105.27	\$1,160,105.27
<b>Line 6</b>	<b>Personal Asset Liquidation</b>	\$74,000.00	\$89,529.93	\$163,529.93
<b>Line 7</b>	<b>Third-Party Litigation Income</b>	\$0.00	\$0.00	\$0.00
<b>Line 8</b>	<b>Miscellaneous - Other (Attorney Escrows)</b>	\$0.00	\$527,347.20	\$527,347.20
	<i>Total Funds Available (Lines 1-8)</i>	<i>\$3,329,660.98</i>		<i>\$5,330,308.13</i>
	<i>Decreases in Fund Balance:</i>			
<b>Line 9</b>	<b>Disbursements to Investors</b>	\$0.00	\$0.00	\$0.00
<b>Line 10</b>	<b>Disbursements for Receivership Operations</b>			
Line 10a	<i>Disbursements to Receiver or Other Professionals</i>	\$0.00	\$1,682,606.00	\$1,682,606.00
Line 10b	<i>Business Asset Expenses</i>	\$0.00	\$9,007.60	\$9,007.60
Line 10c	<i>Personal Asset Expenses (Includes monthly budget for Defendant)</i>	\$6,000.00	\$309,033.55	\$315,033.55
Line 10d	<i>Investment Expenses</i>	\$0.00	\$0.00	\$0.00
Line 10e	<i>Third-Party Litigation Expenses</i>			
1. Attorney Fees		\$0.00	\$0.00	\$0.00
2. Litigation Expenses		\$0.00	\$0.00	\$0.00
<i>Total Third-Party Litigation Expenses</i>		<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Line 10f	<i>Tax Administrator Fees and Bonds</i>	\$0.00	\$0.00	\$0.00
Line 10g	<i>Federal and State Tax Payments</i>	\$0.00	\$0.00	\$0.00
	<b>Total Disbursements for Receivership Operations</b>	<b>\$6,000.00</b>	<b>\$2,000,647.15</b>	<b>\$2,006,647.15</b>
<b>Line 11</b>	<b>Disbursements for Distribution Expenses Paid by the Fund:</b>			
Line 11a	<i>Distribution Plan Development Expenses:</i>			
1. Fees:				
Fund Administration		\$0.00	\$0.00	\$0.00
Independent Distribution Consultant (IDC)		\$0.00	\$0.00	\$0.00
Distribution Agent		\$0.00	\$0.00	\$0.00
Consultants		\$0.00	\$0.00	\$0.00
Legal Advisers		\$0.00	\$0.00	\$0.00
Tax Advisers		\$0.00	\$0.00	\$0.00
2. Administrative Expenses		\$0.00	\$0.00	\$0.00
3. Miscellaneous		\$0.00	\$0.00	\$0.00
<i>Total Plan Development Expenses</i>		<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Line 11b	<i>Distribution Plan Implementation Expenses</i>			
1. Fees:				
Fund Administration		\$0.00	\$0.00	\$0.00
IDC		\$0.00	\$0.00	\$0.00
Distribution Agent		\$0.00	\$0.00	\$0.00
Consultants		\$0.00	\$0.00	\$0.00
Legal Advisers		\$0.00	\$0.00	\$0.00
Tax Advisers		\$0.00	\$0.00	\$0.00
2. Administrative Expenses		\$0.00	\$0.00	\$0.00
3. Investor Identification				
Notice/Publishing Approved Plan		\$0.00	\$0.00	\$0.00
Claimant Identification		\$0.00	\$0.00	\$0.00
Claims Processing		\$0.00	\$0.00	\$0.00
Web Site Maintenance/Call Center		\$0.00	\$0.00	\$0.00
4. Fund Administrator Bond		\$0.00	\$0.00	\$0.00
5. Miscellaneous		\$0.00	\$0.00	\$0.00
6. Federal Account for Investor Restitution (FAIR) Reporting Expenses		\$0.00	\$0.00	\$0.00
<i>Total Plan Implementation Expenses</i>		<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
	<b>Total Disbursements for Distribution Expenses Paid by the Fund</b>			
<b>Line 12</b>	<b>Disbursements to Court/Other:</b>			
Line 12a	<i>Investment Expenses/Court Registry Investment System (CRIS) Fees</i>	\$0.00	\$0.00	\$0.00
Line 12b	<i>Federal Tax Payments</i>	\$0.00	\$0.00	\$0.00
	<b>Total Disbursement to Court/Other:</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
	<b>Total Funds Disbursed (Line 9-11):</b>	<b>\$6,000.00</b>	<b>\$2,000,647.15</b>	<b>\$2,006,647.15</b>
<b>Line 13</b>	<b>Ending Balance (As of 12/31/2024):</b>	<b>\$3,323,660.98</b>		<b>\$3,323,660.98</b>

<b>Line 14</b>	<b>Ending Balance of Fund - Net Assets:</b>			
Line 14a	Cash & Cash Equivalents	\$3,323,660.98	\$0.00	\$3,323,660.98
Line 14b	Investments	\$0.00	\$0.00	\$0.00
Line 14c	Other Assets or Uncleared Funds (Frozen Accounts)	\$0.00	\$0.00	\$0.00
	<b>Total Ending Balance of Fund - Net Assets</b>	<b>\$3,323,660.98</b>	<b>\$0.00</b>	<b>\$3,323,660.98</b>

<b>OTHER SUPPLEMENTAL INFORMATION:</b>				
		<u>Detail</u>	<u>Subtotal</u>	<u>Grand Total</u>
<b>Line 15</b>	<b>Report of Items NOT To Be Paid by the Fund:</b>			
	<b>Disbursements for Plan Administration Expenses Not Paid by the Fund:</b>			
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
	<b>Total Disbursements for Plan Administration Expenses Not Paid by the Fund</b>			
<b>Line 16</b>	<b>Disbursements to Court/Other Not Paid by the Fund:</b>			
Line 16a	Investment Expenses/CRIS Fees	\$0.00	\$0.00	\$0.00
Line 16b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	<b>Total disbursements to Court/Other Not Paid by the Fund:</b>			
<b>Line 17</b>	<b>DC &amp; State Tax Payments</b>	\$0.00	\$0.00	\$0.00
<b>Line 18</b>	<b>No. of Claims:</b>			
Line 18a	# of Claims Received This Reporting Period			0
Line 18b	# of Claims Received Since Inception of Fund			0
<b>Line 19</b>	<b>No. of Claimants/Investors:</b>			
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: \_\_\_\_\_





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

(a) The Receiver's Ninth 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 Ninth Interim Fee Application in the amount of \$27,545.17; it is further ordered that

(c) The Receiver's Retained Professionals be awarded fees incurred during the Ninth Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$27,545.17 and Hays Financial Consulting, LLC for \$2,352.90 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 NCIFA in the aggregate amount of \$5,865.00 are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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JUDGE ANDREW S. HANEN  
UNITED STATES DISTRICT JUDGE