

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

SECURITIES AND EXCHANGE  
COMMISSION,

*Plaintiff,*

VS.

MAURICIO CHAVEZ, GIORGIO  
BENVENUTO and CryptoFX, LLC,

*Defendants.*

CBT Group, LLC,

*Relief Defendant.*

CIVIL ACTION NO. 4:22-CV-03359

JUDGE ANDREW S. HANEN

## RECEIVER'S TENTH 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 Tenth Certified Interim Fee Application, showing the Court as follows:

## SUMMARY OF FEE REQUEST

1. This Tenth Certified Interim Fee Application (“NCIFA”) covers the period from January 1, 2025 to March 31, 2025 (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 Tenth 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, and the Receiver filed his ninth certified fee application covering the period from October 1, 2024 to December 31, 2024, which was granted by the Court on May 12, 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: \$17,010.00 Receiver

(*see* Receiver Invoice attached as **Exhibit A**).; \$36,012.00<sup>1</sup> Shook, Hardy & Bacon L.L.P. (“SHB”) (*see* SHB Invoice attached as **Exhibit B**); \$7,972.60 Hays Financial Consulting, LLC (“Hays”) (*see* Hays Invoice attached as **Exhibit C**). Further, SHB’s fees have been reduced by \$18,020.00 and the Receiver’s fees have been reduced by \$1,050.00.

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 Receiver \$17,010.00; to Shook Hardy and Bacon, LLP in the amount of \$36,012.00; and to Hays in the amount of \$7,972.60. 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 \$5,201.24.

### **STANDARDIZED FUND ACCOUNTING REPORT**

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

### **CASE STATUS**

7. Cash on Hand: The Receivership Estate has \$3,242,223.43 deposited in four trust accounts named for each of the Defendants as of the end of the Application Period (March 31, 2025). These funds were received by (i) taking possession of cash located at the Defendants’

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<sup>1</sup> The status report filed April 30, 2025 stated this amount as \$36,299.50. A reduction to a paralegal’s billing rate caused the decrease in cost to the final amount of \$36,012.00.

office located at 1124 Blalock, Houston, Texas 77055 (\$53,346); (ii) taking possession of safes located at the Defendants' office (\$392,765); (iii) taking possession of First Community Credit Union bank accounts owned by Benvenuto (\$451,448); (iv) taking possession of Bank of America bank accounts owned by Benvenuto (\$21,325); (v) taking possession of a Simmons bank account owned by Benvenuto (\$80,764); (vi) taking possession of a Simmons bank account owned by CBT (\$247,916); (vii) taking possession of a Regions bank account owned by Chavez (\$782); (viii) proceeds from liquidating Coinbase, Inc. account (\$982,924); (ix) proceeds from liquidating Blockchain.com account (\$1,161,141); (x) taking possession of the balance of a retainer from Burford Perry LLC (\$155,631); (xx) taking possession of the balance of retainers from Gerger Hennessy & Martin LLP (\$214,488); (xxi) taking possession of the balance of retainers from Jones Walker LLP (\$102,229); (xxii) taking possession of CryptoFX funds turned over by Defendant Mauricio Chavez (\$55,000); (xxiii) proceeds from liquidating real property at 0 Hogan Lane (\$64,758); (xxiv) proceeds from liquidating televisions (\$3,040); (xxv) proceeds from liquidating bitcoin from an exodus wallet (\$86,915); (xxvi) net sale proceeds from sale of real property at 28 Lawrence Marshall Dr. (\$65,027); (xxvii) proceeds from liquidating 2020 Volkswagen Tiguan owned by Angelica Vargas (\$16,695); (xxix) proceeds from liquidating 2021 Mercedes-Benz GLE AMG owned by Angelica Vargas (\$63,568); (xxx) net auction proceeds from personal property turned over by Defendant Mauricio Chavez (\$9,267); (xl) proceeds from liquidating real property at 0 Mack Washington (\$1,027,280.34); (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 \$5,201.24 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$5,201.24 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 B**. The flat hourly rate of

each SHB attorney working on this matter is \$425.00. The flat hourly rate of SHB timekeepers who are not attorneys is their standard rate.

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

**Receiver, John Lewis Jr.  
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>
32.40	<i>See Ex. A</i>	\$ 17,010.00	\$0	\$17,010.00

**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>
89.70	<i>See Ex. B</i>	\$36,012.00	\$5,201.24	\$41,213.24

**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>
28.30	<i>See Ex. C</i>	\$7,922.60	\$50.00	\$7,972.60

24. The Receiver asks the Court to approve payments to Receiver, on an interim basis in the amount of \$17,010.00 for the Application Period. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$41,213.24 for the Application Period. The Receiver asks the Court to approve payments to Hays in the amount of \$7,972.60 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, John Lewis Jr.**

<b>Task Description</b>	<b>Hours Worked</b>	<b>Total Fees</b>
Case Administration	4.20	\$1,155.00
Claims Administration	30.20	\$ 15,855.00

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

<b>Task Description</b>	<b>Hours Worked</b>	<b>Total Fees</b>
Business Operations	0.40	\$72.00
Case Administration	1.90	\$807.50
Claims Administration	5.00	\$2,125.00
Data Analysis	4.20	\$1,785.00
Status Reports	37.70	\$9,350.00
Litigation	60.40	\$23,657.00

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

<b>Task Description</b>	<b>Hours Worked</b>	<b>Total Fees</b>
Accounting	2.60	\$717.60
Case Administration	1.70	\$520.80
Claims Administration & Objections	3.60	\$1,019.40
Reconstruction Accounting	19.50	\$5,416.40
Tax Issues	0.90	\$248.40

**ARGUMENT AND AUTHORITIES 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.3d 453, 471 (6th Cir. 1999), "the primary concern in an attorney's fee case is that the fees awarded be reasonable." A reasonable fee is "one that is adequate to attract competent counsel. . ." See *Blum v. Stenson*, 465 U.S. 886, 893-94 (1984) (internal

citation omitted). Under the twelve factor test enunciated by the Fifth Circuit in *Johnson v. Georgia Hwy. Express, Inc.*, 488 F.2d 714, 717 (5th Cir. 1974), and adopted by the Supreme Court in *Hensley v. Eckerhart*, 461 U.S. 424, 432 (1983), a court must first determine the loadstar amount by multiplying the reasonable number of hours billed by a reasonable billing rate. *Johnson*, 488 F.2d at 717. That amount can then be adjusted by the “Johnson Factors.”

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 Receiver;
- **Exhibit B** demonstrates professional fees (including (i) the date the services were rendered, (ii) the nature of the services rendered, (iii) the time required for the performance of such services, and (iv) the fees charged for each service rendered and expenses of SHB in connection with the administration of the Receivership;
- **Exhibit C** demonstrates professional fees (including (i) the date the services were rendered, (ii) the nature of the services rendered, (iii) the time required for the performance of such services, and (iv) the fees charged for each service rendered and expenses of Hays in connection with the administration of the Receivership.

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 \$18,020.00 and the Receiver by \$1,050.00. SHB's and the Receiver'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. Corresponding with third parties to identify potential receivership assets;
- e. Reviewing CryptoFX and CBT business records obtained from investors or in response to third-party subpoenas;
- f. Analyzing company records to evaluate potential claims against third parties;
- g. Managing a Relativity database in order to store and review company documents.
- h. Conducting public records searches and related due diligence to affiliated parties, entities, and other potential relief defendants;
- i. Preparing the Receiver's Tenth Interim Status Report;
- j. Reviewing records received from third parties to perform asset tracing analysis;
- n. Coordinating as necessary with government agencies;
- o. Continuing developing electronic claims form for investors;

p. Continuing establishing claims submission and claims allowance processes.

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 Tenth 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: the Receiver \$17,010.00; Shook Hardy & Bacon, LLC for \$36,012.00; and Hays for \$7,972.60.
- (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 \$5,201.24, 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 Tenth 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 Receiver for \$17,010.00; (2) to Shook Hardy & Bacon, LLC for \$36,012.00; and (2) to Hays for \$7,972.60.

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 \$5,201.24.

Dated: May 23, 2025

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/Megan Mitchell

Megan J. Mitchell

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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/Megan Mitchell  
Megan J. Mitchell



**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of May, 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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**SHOOK**  
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**Shook, Hardy & Bacon L.L.P.**

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

**Invoice No:** 3125211  
**Invoice Date:** 05/20/2025  
**Matter Number:** 33206.393697  
**Billing Attorney:** John Lewis Jr.

**Summary of Invoice**

For Professional services and disbursements thru **March 31, 2025**

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

Current Fees \$17,010.00

**Total Amount Due** \$17,010.00

**REMITTANCE INFORMATION**

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

**Wiring Instructions**

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

**Remit Address**

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

**Federal Tax ID:**

44-0585497

Payments received after March 31, 2025 may not be reflected herein.



33206.393697 3125211 05/20/2025

**Invoice Detail**For Professional services and disbursements thru *March 31, 2025*

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

**Professional Services**

Date	Attorney	Description	Hours	Amount
<b>SEC04 Case Admin</b>				
01/27/25	JLJ	Banking	1.00	No Charge
02/06/25	JLJ	Return of inbound calls from victims and victor advisors accumulated over the past month.	2.20	1,155.00
02/10/25	JLJ	Detail review of fee application package.	1.00	No Charge
<b>Subtotal for SEC04 Case Admin</b>			4.20	\$1,155.00
<b>SEC05 Claims Admin</b>				
01/06/25	JLJ	Return numerous calls with victims and other parties in interest as to claims process and other matters related to receivership.	2.20	\$1,155.00
01/07/25	JLJ	Review and comment on iterations of claims portal.	0.80	420.00
01/10/25	JLJ	Attention to design and elements of claims process. Strategy meeting with claims agent candidate firm reviewing approach to noticing, solicitation of claim, process and protocol for reviewing and approval of claims, reporting routines, claims reporting to receiver and proposal pricing.	3.50	1,837.50
01/13/25	JLJ	Attention to banking matters. Reconciliation of bank statements. Prepare for Status conference with court.	1.30	682.50
01/14/25	JLJ	Exchanges around prep for court ordered status conference. Strategic conferral regarding court briefing on ongoing workstreams in receivership.	0.80	420.00
01/15/25	JLJ	Skim victim outreach metrics. Prepare for call with SEC (Gulde) to discuss court ordered status conference. Lead call with SEC, S. Askew on issues relative to initiation of claims process.	2.50	1,312.50
01/17/25	JLJ	Review claims process motion templates. Prep for status conference with Court. Preparation call with P. Pritchett.	3.20	1,680.00
01/18/25	JLJ	Review links to elements of claims database. Assess functionality for online and paper submission. Testing of interface with larger database website.	2.60	1,365.00
01/21/25	JLJ	Call with C. Fluker regarding project for claims registration pleadings.	0.80	420.00
02/06/25	JLJ	Review of revisions to claims intake database. Develop worklist for close out steps.	0.60	315.00



33206.393697 3125211 05/20/2025

02/11/25	JLJ	Review and weigh in on iterations of claims submission portal.	0.90	472.50
02/13/25	JLJ	Attention to claims process design, scope of work for claims agents and timing of claims submission, review and claims resolution options.	3.30	1,732.50
02/26/25	JLJ	Return calls from prospective victims and counsel. Notes to file regarding same.	0.70	367.50
03/04/25	JLJ	Call with team and claims vendor to plan rollout of claims portal. Followup conversations following team call.	0.80	420.00
03/11/25	JLJ	Discussions regarding considerations and options for roll out of claims portal.	2.30	1,207.50
03/11/25	JLJ	Skim claims and related to inform and approximate CFX claims.	1.80	945.00
03/13/25	JLJ	Edits to receiver claims motion and proposed orders.	0.80	420.00
03/26/25	JLJ	Final review and comments to claims portal mock up.	0.70	367.50
03/27/25	JLJ	Turns of emails regarding claims form and related motion and draft order.	0.60	315.00
<b>Subtotal for SEC05</b>		<b>Claims Admin</b>	<b>30.20</b>	<b>\$15,855.00</b>
<b>Total</b>			<b>34.40</b>	<b>\$17,010.00</b>

**Timekeeper Summary**

<b>Initials</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
JLJ	John Lewis Jr.	32.40	\$525.00	\$17,010.00
<b>Total Fees</b>		<b>32.40</b>		<b>\$17,010.00</b>

<b>Total Amount Due</b>	<b>\$17,010.00</b>
-------------------------	--------------------

**Shook, Hardy & Bacon L.L.P.**

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

**SHOOK HARDY AND BACON**

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

**Invoice No:****3125210****Invoice Date:**

05/20/2025

**Matter Number:**

33206.389768

**Billing Attorney:**

John Lewis Jr.

**Summary of Invoice**

For Professional services and disbursements thru **March 31, 2025**

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

Current Fees	\$36,012.00
Current Disbursements	5,201.24
<b>Total Current Fees and Disbursements</b>	<b>\$41,213.24</b>
Previous Balance	27,545.17
<b>Total Amount Due</b>	<b>\$68,758.41</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 March 31, 2025 may not be reflected herein.



33206.389768 3125210 05/20/2025

**Invoice Detail**For Professional services and disbursements thru *March 31, 2025*

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

**Professional Services**

Date	Attorney	Description	Hours	Amount
<b>SEC03 Business Operations</b>				
02/18/25	LNBY	Pulling a docket for Charelle Fluker	0.40	\$72.00
<b>Subtotal for SEC03 Business Operations</b>			0.40	\$72.00
<b>SEC04 Case Admin</b>				
01/10/25	PEP	Review status of request from T. Lies and follow up with regard to same.	0.30	\$127.50
01/14/25	PEP	Attention to upcoming status conference including stouts of various items.	0.40	170.00
01/15/25	PEP	Communication with victim.	0.20	85.00
02/05/25	PEP	Review status of document collection [REDACTED].	0.20	85.00
02/11/25	PEP	Confer with S. Askue regarding disgorgement amount for Receivership entities.	0.20	85.00
02/11/25	PEP	Intake documentation from victim.	0.40	170.00
02/14/25	PEP	Further attention to motion to approve plan and proposed plan.	0.20	85.00
<b>Subtotal for SEC04 Case Admin</b>			1.90	\$807.50
<b>SEC05 Claims Admin</b>				
01/07/25	PEP	Communication with vendor regarding claims database and agent.	0.20	\$85.00
01/10/25	PEP	Meeting with Veritas to discuss claims submission.	0.50	212.50
01/23/25	PEP	Attention to motion to approve plan.	1.00	425.00
02/20/25	PEP	Review additional briefing from C. Fluker.	0.20	85.00
02/27/25	PEP	Communications regarding status of claims portal.	0.40	170.00
03/04/25	PEP	Attention to motion for approval of plan.	2.00	850.00
03/04/25	PEP	Participate in call with vendor regarding remaining steps to activation of claims portal.	0.50	212.50
03/27/25	PEP	Comments to claim submission form.	0.20	85.00
<b>Subtotal for SEC05 Claims Admin</b>			5.00	\$2,125.00
<b>SEC11 Status Reports</b>				
01/21/25	CAF	Read and analyze all previous filed Receiver status reports.	3.40	No Charge
01/21/25	CAF	Onboarding to case.	0.50	No Charge
01/22/25	PEP	Attention to status report and associated exhibits, including follow up on minor few items.	1.00	425.00



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01/23/25	CAF	Onboarding meeting with Poston Pritchett and receive assignment with regard to motion in support of receiver's distribution plan	0.50	No Charge
01/24/25	PEP	Attention to status report, fee application, and exhibits.	2.50	No Charge
01/27/25	CAF	Review and edit eighth receivership status report	4.50	No Charge
01/27/25	CAF	Review motions of approval of receiver's distribution plan	2.60	1,105.00
01/28/25	PEP	Revise status report for circulation.	0.30	127.50
01/29/25	CAF	Edit and review receivership status report and file with the court	2.40	No Charge
01/30/25	PEP	Final attention to status report.	0.40	170.00
01/31/25	CAF	Correspond with supervising attorney on drafting upcoming motion for approval of receiver's distribution plan	0.40	170.00
02/03/25	CAF	Draft motion for receivership distribution plan and brief of support of distribution plan	2.20	935.00
02/04/25	CAF	Draft motion for receivership plan and brief in support of receivership plan with focus on relevant facts and background.	4.60	1,955.00
02/07/25	PEP	Attention to fee application.	1.50	No Charge
02/10/25	CAF	Draft motion for distribution plan and brief in support of distribution plan.	1.50	637.50
02/11/25	PEP	Attention to fee application.	0.40	No Charge
02/11/25	CAF	Draft motion for distribution plan and brief in support of distribution plan.	2.50	1,062.50
02/12/25	CAF	Draft motion for distribution plan and brief in support of distribution plan.	2.10	892.50
03/03/25	CAF	Draft motion in support of receiver's motion for the court to approve plan while adding a section for a bar claims date	4.40	1,870.00
<b>Subtotal for SEC11 Status Reports</b>			<b>37.70</b>	<b>\$9,350.00</b>

**SEC13      Litigation**

01/10/25	MKF	Perform Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED]	2.50	\$975.00
01/10/25	MKF	Preparation and organization of documents to be shared with SEC.	2.50	975.00
01/13/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED]	2.50	975.00
01/14/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED]	2.50	975.00
01/14/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.00	780.00
01/15/25	MKF	Continued Relativity searches regarding accounting	2.50	975.00



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		spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED]		
01/15/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.50	975.00
01/16/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED].	2.50	975.00
01/17/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED] cios.	2.50	975.00
01/17/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.50	975.00
01/22/25	MKF	Perform searches regarding Webster's Auction Palace payments.	0.50	195.00
01/22/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED].	2.50	975.00
01/23/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED].	2.50	975.00
01/23/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.50	975.00
01/27/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED] rcios.	2.50	975.00
01/27/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.50	975.00
01/28/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED].	2.50	975.00
01/28/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.50	975.00
01/29/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED].	2.50	975.00
01/30/25	MKF	Continued Relativity searches regarding accounting spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED].	2.50	975.00
01/30/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.50	975.00
01/31/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.50	975.00
01/31/25	MKF	Continued Relativity searches regarding accounting	2.50	975.00





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		spreadsheets, leader spreadsheets, payout sheets, master accounting sheets and documents produced by [REDACTED] rcios.		
02/05/25	MKF	Continued preparation and organization of documents to be shared with SEC.	2.50	975.00
02/11/25	PEP	Review S. Askue analysis of potential disgorgement amount.	0.40	170.00
02/13/25	PEP	Analyze Motion to Approve Plan and Proposed Plan.	1.00	425.00
03/03/25	PEP	Revisions to Brief in Support of Receiver's plan.	0.70	297.50
03/12/25	PEP	Review analysis for disgorgement amounts for settlement.	0.80	340.00
<b>Subtotal for SEC13</b>		Litigation	60.40	\$23,657.50
<b>Total</b>			105.40	\$36,012.00

**Timekeeper Summary**

Initials	Name	Hours	Rate	Amount
PEP	Poston E. Pritchett	11.50	\$425.00	\$4,887.50
CAF	Charelle A. Fluker	20.30	425.00	8,627.50
MKF	Mia K. Fleming	57.50	390.00	22,425.00
LNBY	Lindsey N. Bangert	0.40	180.00	72.00
<b>Total Fees</b>		<b>89.70</b>		<b>\$36,012.00</b>

**Disbursements**

Date	Description	Amount
<b>Expense Code: E113</b>		
03/11/25	Veritext - Service of Subpoena Veritext, Service of Subpoena/Summons for Henry Nguyen.	\$503.25
03/11/25	Veritext - Service of Subpoena Veritext, Service of Subpoena/Summons for Olegario Munoz	67.75
03/11/25	Veritext - Service of Subpoena Veritext, Service of Subpoena/Summons and Witness Fee of Man Lol Wong	224.10
03/11/25	Veritext - Service of Subpoena Veritext, Service of Subpoena/Summons for Juakin Santamaria.	198.25
<b>Subtotal for E113</b>		<b>\$993.35</b>

<b>Expense Code: E118</b>		
01/31/25	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for January 2025, related to SEC v. Mauricio Chavez, et al.	\$1,427.63
02/28/25	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for February 2025, related to SEC v. Mauricio Chavez, et al.	1,427.63



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Date	Description	Amount
03/31/25	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for March 2025, related to SEC v. Mauricio Chavez, et al.	1,352.63
<b>Subtotal for</b>	<b>E118</b>	<b>\$4,207.89</b>
<b>Total Disbursements</b>		<b>\$5,201.24</b>
Current Disbursements		5,201.24
<b>Total Current Fees and Disbursements</b>		<b>\$41,213.24</b>
Previous Balance		27,545.17
<b>Total Amount Due</b>		<b>\$68,758.41</b>

**Hays Financial Consulting, LLC**

2964 Peachtree Road  
Suite 555  
Atlanta, GA 30305-2153

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

**For the Period from 1/1/2025 to 3/31/2025**

April 23, 2025

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
James R. Jennings, CPA	0.50	138.00
	276.00/hr	
S. Gregory Hays, CTP, CIRA	1.30	470.60
	362.00/hr	
Scott S. Askue	26.50	7,314.00
	276.00/hr	
<b>For professional services rendered</b>	<b>28.30</b>	<b>\$7,922.60</b>
Additional Charges :		
Tax Return Preparation		50.00
<b>Total costs</b>		<b>\$50.00</b>
<b>Total amount of this bill</b>		<b>\$7,972.60</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 1/1/2025 to 3/31/2025**

April 23, 2025

Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting	2.60	717.60
Case Administration	1.70	520.80
Claims Administration & Objections	3.60	1,019.40
Reconstruction Accounting	19.50	5,416.40
Tax Issues	0.90	248.40
<b>For professional services rendered</b>	<b>28.30</b>	<b>\$7,922.60</b>
Additional Charges :		
Tax Return Preparation		50.00
<b>Total costs</b>		<b>\$50.00</b>
<b>Total amount of this bill</b>		<b>\$7,972.60</b>

**Hays Financial Consulting, LLC**

2964 Peachtree Road  
Suite 555  
Atlanta, GA 30305-2153

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

**For the Period from 1/1/2025 to 3/31/2025**

April 23, 2025

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>Accounting</u></b>			
1/23/2025	SSA Prepared SFAR, asset and recovery report and receipts and disbursement report through 12/31/2024.	2.10 276.00/hr	579.60
1/24/2025	SSA Prepared fee payment allocation based on bank account balances of the four receivership estates.	0.50 276.00/hr	138.00
	Subtotal	2.60	717.60
<b><u>Case Administration</u></b>			
1/15/2025	SSA Telephone conference with the Receiver and SEC regarding upcoming status hearing and wind up of receivership.	0.80 276.00/hr	220.80
1/29/2025	SSA Reviewed ninth status report and drafted email to Poston Pritchett regarding same.	0.30 276.00/hr	82.80
1/30/2025	SGH Reviewed and edited status report and emails regarding same.	0.40 362.00/hr	144.80
2/13/2025	SGH Reviewed email from Poston Pritchett.	0.20 362.00/hr	72.40
	Subtotal	1.70	520.80
<b><u>Claims Administration &amp; Objections</u></b>			
1/10/2025	SSA Prepared for and conference call with the Receiver, Poston Pritchett and Lisa Ferm regarding claims administration issues and web site.	1.30 276.00/hr	358.80
1/14/2025	SSA Researched for claims administration procedures and plans used in other matters. Drafted email to the Receiver regarding same.	0.80 276.00/hr	220.80
1/15/2025	SGH Reviewed pending matters regarding claim and discussed with Scott Askue.	0.30 362.00/hr	108.60
2/5/2025	SSA Reviewed claim form and tax issues. Drafted emails to Jim Jennings regarding same. Drafted email to Receiver team regarding same.	0.70 276.00/hr	193.20
3/4/2025	SSA Prepared for and conference call with the Receiver, Poston Pritchett and Lisa Ferm regarding claim portal and other claim issues.	0.50 276.00/hr	138.00
	Subtotal	3.60	1,019.40
<b><u>Reconstruction Accounting</u></b>			
2/11/2025	SSA Reviewed various reports from Salesforce. Prepared data and analysis for calculation of penalties.	1.70 276.00/hr	469.20

**SEC v CryptoFX**

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/11/2025	SGH	0.40	144.80
		362.00/hr	
3/17/2025	SSA	1.30	358.80
		276.00/hr	
	SSA	1.30	358.80
		276.00/hr	
	SSA	2.80	772.80
		276.00/hr	
3/18/2025	SSA	4.20	1,159.20
		276.00/hr	
3/19/2025	SSA	4.70	1,297.20
		276.00/hr	
	SSA	1.60	441.60
		276.00/hr	
3/20/2025	SSA	1.50	414.00
		276.00/hr	
	Subtotal	19.50	5,416.40
<b><u>Tax Issues</u></b>			
1/15/2025	SSA	0.40	110.40
		276.00/hr	
2/23/2025	JRJ	0.50	138.00
		276.00/hr	
	Subtotal	0.90	248.40
	<b>For professional services rendered</b>	<b>28.30</b>	<b>\$7,922.60</b>

SEC v CryptoFX

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Additional Charges :

	<u>Amount</u>
<u>Expenses</u>	
3/4/2025 Tax software licensing fee for filing of year 2024 CBT returns.	50.00
Subtotal	50.00
Total costs	<u>\$50.00</u>
Total amount of this bill	<u><u>\$7,972.60</u></u>

**STANDARDIZED FUND ACCOUNTING REPORT for**  
**Receivership in SEC v. Mauricio Chavez, Giorgio Benvenuto and Crypto FX, LLC - Cash Basis**  
**Receivership; Civil Court Docket No. 4:22-cv-3359**  
**Reporting Period 01/01/2025 to 03/31/2025**

<b>FUND ACCOUNTING (See Instructions:)</b>				
		<b><u>Detail (for Current Period)</u></b>	<b><u>Subtotal (From Prior Period)</u></b>	<b><u>Grand Total (All Periods)</u></b>
<b>Line 1</b>	<b>Beginning Balance</b>	\$3,323,660.98		\$0.00
	<b><i>Increases in Fund Balance:</i></b>			
<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>	\$0.00	\$163,529.93	\$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
	<b>Total Funds Available (Lines 1-8)</b>	<b>\$3,323,660.98</b>		<b>\$5,330,308.13</b>
	<b><i>Decreases in Fund Balance:</i></b>			
<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	Disbursements to Receiver or Other Professionals	\$81,437.55	\$1,682,606.00	\$1,764,043.55
Line 10b	Business Asset Expenses	\$0.00	\$9,007.60	\$9,007.60
Line 10c	Personal Asset Expenses (Includes monthly budget for Defendant)	\$0.00	\$315,033.55	\$315,033.55
Line 10d	Investment Expenses	\$0.00	\$0.00	\$0.00
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees	\$0.00	\$0.00	\$0.00
	2. Litigation Expenses	\$0.00	\$0.00	\$0.00
	<b>Total Third-Party Litigation Expenses</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
Line 10f	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.00
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.00
	<b>Total Disbursements for Receivership Operations</b>	<b>\$81,437.55</b>	<b>\$2,006,647.15</b>	<b>\$2,088,084.70</b>
<b>Line 11</b>	<b>Disbursements for Distribution Expenses Paid by the Fund:</b>			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	<b>Total Plan Development Expenses</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
Line 11b	Distribution Plan Implementation Expenses			
	1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification			
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	Web Site Maintenance/Call Center	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses	\$0.00	\$0.00	\$0.00
	<b>Total Plan Implementation Expenses</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
	<b>Total Disbursements for Distribution Expenses Paid by the Fund</b>			
<b>Line 12</b>	<b>Disbursements to Court/Other:</b>			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$0.00	\$0.00	\$0.00
Line 12b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	<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>\$81,437.55</b>	<b>\$2,006,647.15</b>	<b>\$2,088,084.70</b>
<b>Line 13</b>	<b>Ending Balance (As of 03/31/2025):</b>	<b>\$3,242,223.43</b>		<b>\$3,242,223.43</b>



<b>Line 14</b>	<b>Ending Balance of Fund - Net Assets:</b>			
Line 14a	Cash & Cash Equivalents	\$3,242,223.43	\$0.00	\$3,242,223.43
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>\$3,242,223.43</b>	<b>\$0.00</b>	<b>\$3,242,223.43</b>

OTHER SUPPLEMENTAL INFORMATION:				
		<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 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: \_\_\_\_\_

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

SECURITIES AND EXCHANGE  
COMMISSION,

*Plaintiff,*

VS.

MAURICIO CHAVEZ, GIORGIO  
BENVENUTO and CryptoFX, LLC,

*Defendants.*

CBT Group, LLC,

*Relief Defendant.*

CIVIL ACTION NO. 4:22-CV-03359

JUDGE ANDREW S. HANEN

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

On May 23, 2025, counsel for John Lewis, Jr., the Court-appointed Receiver for Mauricio Chavez (“Chavez”), Giorgio Benvenuto (“Benvenuto”), CryptoFX, LLC (“CryptoFX”), and CBT Group, LLC (“CBT”) (collectively, the “Receivership Defendants”), filed an Application Authorizing Payment of Receiver’s Tenth Certified Interim Fee Application (“NCIFA”), which seeks approval of the fees incurred by the Receiver and the Receiver’s Retained Professionals from January 1, 2025 to March 31, 2025 (the “Application Period”).

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

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

(a) The Receiver's Tenth 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 Tenth Interim Fee Application in the amount of \$17,010.00; 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 \$36,012.00 and Hays Financial Consulting, LLC for \$7,972.60; 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 \$5,201.24 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