



2. This is the Eleventh 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, the Receiver filed his ninth certified fee application<sup>1</sup> covering the period from October 1, 2024 to December 31, 2024, which was granted by the Court on May 12, 2025, and the Receiver filed his

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<sup>1</sup> The order approving the ninth fee application at docket number 137 shows expenses of \$5,865.00 and the Receiver fee of \$27,545.17. The expenses paid out were the actual amounts of \$0 for the Receiver because he did not incur fees during that period and expenses of \$2,882.67.

tenth certified fee application covering the period from January 1, 2025 to March 31, 2025, which was granted by the Court on May 30, 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: \$2,467.50 Receiver (*see* Receiver Invoice attached as **Exhibit A**); \$12,960.00 Shook, Hardy & Bacon L.L.P. (“SHB”) (*see* SHB Invoice attached as **Exhibit B**); \$4,837.10 Hays Financial Consulting, LLC (“Hays”) (*see* Hays Invoice attached as **Exhibit C**). Further, SHB’s fees have been reduced by \$4,927.50 and the Receiver’s fees have been reduced by \$2,205.00.

4. The Receiver served a copy of this ECIFA, together with all exhibits and billing information to counsel for the SEC. The Receiver and counsel for the SEC have conferred about the ECIFA 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 ECIFA as follows: to Receiver \$2,467.50; to Shook Hardy and Bacon, LLP in the amount of \$19,750.16; and to Hays in the amount of \$4,927.50. 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 \$6,790.16.

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 (June 30, 2025). These funds were received by (i) taking possession of cash located at the Defendants' office located at 1124 Blalock, Houston, Texas 77055 (\$53,346); (ii) taking possession of safes located at the Defendants' office (\$392,765); (iii) taking possession of First Community Credit Union bank accounts owned by Benvenuto (\$451,448); (iv) taking possession of Bank of America bank accounts owned by Benvenuto (\$21,325); (v) taking possession of a Simmons bank account owned by Benvenuto (\$80,764); (vi) taking possession of a Simmons bank account owned by CBT (\$247,916); (vii) taking possession of a Regions bank account owned by Chavez (\$782); (viii) proceeds from liquidating Coinbase, Inc. account (\$982,924); (ix) proceeds from liquidating Blockchain.com account (\$1,161,141); (x) taking possession of the balance of a retainer from Burford Perry LLC (\$155,631); (xx) taking possession of the balance of retainers from Gerger Hennessy & Martin LLP (\$214,488); (xxi) taking possession of the balance of retainers from Jones Walker LLP (\$102,229); (xxii) taking possession of CryptoFX funds turned over by Defendant Mauricio Chavez (\$55,000); (xxiii) proceeds from liquidating real property at 0 Hogan Lane (\$64,758); (xxiv) proceeds from liquidating televisions (\$3,040); (xxv) proceeds from liquidating bitcoin from an exodus wallet (\$86,915); (xxvi) net sale proceeds from sale of real property at 28 Lawrence Marshall Dr. (\$65,027); (xxvii) proceeds from liquidating 2020 Volkswagen Tiguan owned by Angelica Vargas (\$16,695); (xxix) proceeds from liquidating 2021 Mercedes-Benz GLE AMG owned by Angelica Vargas (\$63,568); (xxx) net auction proceeds from personal property turned over by Defendant Mauricio Chavez (\$9,267); (xl) proceeds from liquidating real property

at 0 Mack Washington (\$1,027,280.34); (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 (June 30, 2025) 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 \$6,790.16 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$6,790.16 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>
4.70	<i>See Ex. A</i>	\$ 2,467.50	\$0	\$2,467.50

**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>
30.70	<i>See Ex. B</i>	\$12,960.00	\$6,790.16	\$19,750.16

**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>
17.30	<i>See Ex. C</i>	\$4,777.40	\$59.70	\$4,837.10

24. The Receiver asks the Court to approve payments to Receiver, on an interim basis in the amount of \$2,467.50 for the Application Period. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$19,750.16 for the Application Period.

The Receiver asks the Court to approve payments to Hays in the amount of \$4,837.10 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	5.00	\$420.00
Claims Administration	3.90	\$2,047.50

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

<b>Task Description</b>	<b>Hours Worked</b>	<b>Total Fees</b>
Asset Analysis	2.40	\$0.00
Asset Disposition	4.30	\$1,827.50
Case Administration	8.30	\$3,187.50
Claims Administration	0.20	\$85
Status Reports	12.10	\$4,547.50
Litigation Consulting	12.60	\$2,082.50
Litigation	3.10	\$1,230.00

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

<b>Task Description</b>	<b>Hours Worked</b>	<b>Total Fees</b>
Accounting	1.60	\$441.60
Data Analysis	2.40	\$662.40
Litigation Consulting	2.50	\$724.40
Tax Issues	10.80	\$2,949.00

**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.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 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 \$4,927.50 and the Receiver by \$2,205.00. 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. Reviewing CryptoFX and CBT business records obtained from investors or in response to third-party subpoenas;
- e. Managing a Relativity database in order to store and review company documents.
- f. Conducting public records searches and related due diligence to affiliated parties, entities, and other potential relief defendants;
- g. Preparing the Receiver's Eleventh Interim Status Report;

- h. Coordinating as necessary with government agencies;
- i. Continuing developing electronic claims form for investors;
- j. 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 Eleventh 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 ECIFA 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 Eleventh Interim Fee Application as follows: the Receiver \$2,467.50; Shook Hardy & Bacon, LLC for \$19,750.16; and Hays for \$4,837.10.
- (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 \$6,790.16, 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 Eleventh 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 \$2,467.50; (2) to Shook Hardy & Bacon, LLC for \$19,750.16; and (2) to Hays for \$4,837.10.

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 \$6,790.16.

Dated: September 16, 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 16 September 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/Megan Mitchell  
Megan J. Mitchell

# **Exhibit A**



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

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

**Invoice No: 3136100**  
Invoice Date: 07/31/2025  
Matter Number: 33206.393697  
Billing Attorney: John Lewis Jr.

**Summary of Invoice**

For Professional services and disbursements thru **June 30, 2025**

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

Current Fees	\$2,467.50
<b>Total Amount Due</b>	<b>\$2,467.50</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 June 30, 2025 may not be reflected herein.



33206.393697 3136100 07/31/2025

## Invoice Detail

For Professional services and disbursements thru *June 30, 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>				
04/16/25	JLJ	Review of case filings and claims administrator submissions.	2.70	No Charge
06/04/25	JLJ	Confer with M. Mitchell regarding Vargas lis pendens release, SEC requested declaration, further edits to claims form and motion.	0.80	420.00
06/26/25	JLJ	Administrative matters relative to claims portal and related court relief. Conference with M. Mitchell regarding open tasks.	1.50	No Charge
<b>Subtotal for SEC04 Case Admin</b>			<b>5.00</b>	<b>\$420.00</b>
<b>SEC05 Claims Admin</b>				
04/17/25	JLJ	Coordination with team on claims portal, development of victim, agency and constituent database and technical aspects of portal.	1.40	\$735.00
04/21/25	JLJ	Working session with claims portal team to consolidate victim contact information, procedural aspects of claims submission review, and approval. Create timeline for claims adjudication process through case closure.	2.50	1,312.50
<b>Subtotal for SEC05 Claims Admin</b>			<b>3.90</b>	<b>\$2,047.50</b>
<b>Total</b>			<b>8.90</b>	<b>\$2,467.50</b>

### Timekeeper Summary

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	4.70	\$525.00	\$2,467.50
<b>Total Fees</b>		<b>4.70</b>		<b>\$2,467.50</b>

**Total Amount Due** \$2,467.50

# **Exhibit B**



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

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

**Invoice No:** 3136104  
**Invoice Date:** 07/31/2025  
**Matter Number:** 33206.389768  
**Billing Attorney:** John Lewis Jr.

**Summary of Invoice**

For Professional services and disbursements thru **June 30, 2025**

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

Current Fees	\$12,960.00
Current Disbursements	6,790.16
<b>Total Current Fees and Disbursements</b>	<b>\$19,750.16</b>
Previous Balance	68,758.41
<b>Total Amount Due</b>	<b>\$88,508.57</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 June 30, 2025 may not be reflected herein.



33206.389768 3136104 07/31/2025

## Invoice Detail

For Professional services and disbursements thru *June 30, 2025*

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

### Professional Services

Date	Attorney	Description	Hours	Amount
<b>SEC01 Asset Analysis</b>				
06/05/25	ENY	Itemize remaining assets.	2.40	No Charge
<b>Subtotal for SEC01 Asset Analysis</b>			2.40	\$0.00
<b>SEC02 Asset Disposition</b>				
06/02/25	MJM	Correspond with Amy re: sale of Round Moon property.	0.10	\$42.50
06/02/25	MJM	Research re: sale of Round Moon property and releasing lis pendens.	0.50	212.50
06/02/25	MJM	Call with Amy re: sale of Round Moon property.	0.20	85.00
06/02/25	MJM	Read email from and listen to voicemail from Sonila re: sale of Round Moon property.	0.10	42.50
06/05/25	MJM	Correspond with title company re: Round Moon property.	0.20	85.00
06/11/25	CMG	Evaluate logistics of paying out claims.	0.30	127.50
06/11/25	MJM	Correspond re: non-liquidated assets.	0.20	85.00
06/11/25	MJM	Walk around with Evalyn and inventory additional items stored in multiple places and send images of each item to Evalyn .	0.90	382.50
06/12/25	MJM	Draft release notice of Lis Pendens.	0.20	85.00
06/20/25	MJM	Draft release notice of Lis Pendens and communicate in multiple emails re: same.	0.90	382.50
06/23/25	MJM	Prepare release of lis pendens on Round Moon property, for mailing to clerk's office.	0.40	170.00
06/24/25	MJM	Prepare release of lis pendens on Round Moon property, for mailing to clerk's office.	0.30	127.50
<b>Subtotal for SEC02 Asset Disposition</b>			4.30	\$1,827.50
<b>SEC04 Case Admin</b>				
04/02/25	PEP	Attention to request from T. Lies.	0.30	\$127.50
04/08/25	PEP	Attention to request from T. Lies.	0.20	85.00
04/18/25	PEP	Respond to inquiry from T. Lies regarding document productions.	0.40	170.00
04/23/25	PEP	Review inquiry from AUSA regarding status of productions.	0.20	85.00
04/23/25	MJM	Read email from FBI and work with Poston on response re: privileged communications.	0.50	212.50
05/01/25	PEP	Attention to questions regarding privilege.	0.20	85.00



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05/06/25	PEP	Review status of claims portal and motion to approve same.	0.40	170.00
05/14/25	MJM	Review draft invoice and correspond with Randy re: same.	0.20	85.00
05/19/25	MJM	Correspond with Randy re: invoice.	0.10	42.50
06/03/25	MJM	Review multiple documents associated with SEC declaration.	1.80	765.00
06/04/25	MJM	Correspond with multiple parties re: tenth fee app request.	0.80	No Charge
06/04/25	MJM	Correspond with multiple parties SEC re: declaration.	0.80	340.00
06/04/25	MJM	Correspond re: releasing Round Moon property.	0.20	85.00
06/06/25	MJM	Correspond with SEC and Receiver re: declaration, make edits to declaration and finalize.	0.80	340.00
06/11/25	MJM	Correspond with title company re: Round Moon property and begin draft of release of notice of lis pendens.	1.00	425.00
06/17/25	PEP	Review status of various items.	0.20	85.00
06/25/25	MJM	Correspond with John re: claims motion, selling property	0.20	85.00
<b>Subtotal for SEC04</b>	<b>Case Admin</b>		<b>8.30</b>	<b>\$3,187.50</b>
<b>SEC05 Claims Admin</b>				
05/22/25	PEP	Attention to communication from T. Lies regarding documents for receiver.	0.20	\$85.00
<b>Subtotal for SEC05</b>	<b>Claims Admin</b>		<b>0.20</b>	<b>\$85.00</b>
<b>SEC11 Status Reports</b>				
04/21/25	CAF	Correspond with supervising attorney on upcoming deadlines and receive guidance on completing motion to distribute	1.00	\$425.00
04/21/25	CAF	Provide summary of meeting to supervising attorney and review and edit motion to distribute.	1.30	552.50
04/22/25	MJM	Communicate with Poston and John re: status report.	0.30	127.50
04/22/25	PEP	Attention to fee application and status report.	0.40	No Charge
04/24/25	PEP	Review fees and invoices for status report.	0.40	No Charge
04/28/25	MJM	Draft quarterly status report.	2.00	850.00
04/29/25	PEP	Attention to status report.	0.50	212.50
04/29/25	MJM	Correspond with John and Poston re: draft of quarterly status report.	0.30	127.50
04/29/25	MJM	Continue draft of quarterly status report.	1.20	510.00
04/30/25	PEP	Attention to status report.	1.00	425.00
04/30/25	MJM	Finalize draft of quarterly status report including edits and prepare for filing.	1.60	680.00
05/12/25	PEP	Attention to upcoming fee application.	0.20	No Charge
05/12/25	PEP	Analyze order regarding Ninth Fee Application.	0.20	No Charge
05/15/25	PEP	Attention to fee application and other pending items.	0.20	No Charge
06/04/25	CMG	Develop strategy for Receiver's Final Report.	0.30	127.50
06/10/25	CMG	Revise report regarding claims process.	1.20	510.00



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<b>Subtotal for SEC11</b>	Status Reports	12.10	\$4,547.50
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**SEC12 Litigation Consulting**

05/01/25	MJM	Correspond with FBI and Poston re: privilege.	0.30	\$127.50
05/02/25	MJM	Meet with John and Sonila re: motion, claims process, and privilege documents.	0.50	212.50
05/06/25	MJM	Discuss with Selena case updates for John.	0.10	42.50
05/06/25	MJM	Prepare for meeting with Poston re: case updates.	0.20	85.00
05/06/25	MJM	Meet with Poston re: claims process, winding down estate, privilege documents, and motion.	0.30	127.50
05/12/25	MJM	Correspond with AUSA re: privilege documents.	0.30	127.50
05/12/25	MJM	Attention to fee app.	0.80	No Charge
05/12/25	MJM	Correspond with Randy re: accounting.	0.30	127.50
05/15/25	MJM	Attention to fee app.	2.50	No Charge
05/16/25	MJM	Attention to fee app.	2.80	No Charge
05/22/25	MJM	Call with Poston to discuss declaration.	0.20	85.00
05/23/25	MJM	Correspond with Tyson re: declaration.	0.10	42.50
05/23/25	MJM	Final edits to and correspondence re: tenth fee application.	1.30	No Charge
05/23/25	MJM	Correspond re: declaration of receiver.	0.10	42.50
05/29/25	MJM	Correspondence re: declaration and review of files.	1.10	467.50
05/30/25	MJM	Correspondence re: liquidating Round Moon Lane property and research re: same.	0.50	212.50
06/09/25	MJM	Look into question re: ninth fee application.	0.30	No Charge
06/10/25	MJM	Multiple correspondences re: Round Moon Property.	0.20	85.00
06/26/25	MJM	Correspond with underwriter and Selena re: release.	0.30	127.50
06/26/25	MJM	Meet with John re: claims motion and release.	0.40	170.00
<b>Subtotal for SEC12</b>	Litigation Consulting	12.60	\$2,082.50	

**SEC13 Litigation**

04/08/25	MKF	Perform searches regarding O. Turcios materials.	1.50	\$585.00
05/20/25	PEP	Review S. Askue analysis for M. Chavez disgorgement and summarize same for M. Gulde.	0.40	170.00
05/22/25	PEP	Attention to Declaration for Receiver.	0.20	85.00
05/22/25	MKF	Organization of received documents for substantive attorney review.	1.00	390.00
<b>Subtotal for SEC13</b>	Litigation	3.10	\$1,230.00	
<b>Total</b>		43.00	\$12,960.00	

**Timekeeper Summary**

Initials	Name	Hours	Rate	Amount
CMG	Caroline M. Gieser	1.80	\$425.00	\$765.00
PEP	Poston E. Pritchett	4.20	425.00	1,785.00
CAF	Charelle A. Fluker	2.30	425.00	977.50
MJM	Megan J Mitchell	19.90	425.00	8,457.50



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Initials	Name	Hours	Rate	Amount
MKF	Mia K. Fleming	2.50	390.00	975.00
<b>Total Fees</b>		<b>30.70</b>		<b>\$12,960.00</b>

**Disbursements**

Date	Description	Amount
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**Expense Code: E107**

06/09/25	Delivery-UPS-1Z9XR8110722867604 from Sydney Barnett to Hays Financial Consulting, LLC	\$18.37
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<b>Subtotal for E107</b>		<b>\$18.37</b>
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**Expense Code: E108**

04/01/25	Special Postage	\$0.00
06/24/25	Special Postage	13.30

<b>Subtotal for E108</b>		<b>\$13.30</b>
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**Expense Code: E118**

04/30/25	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for April 2025, related to SEC v. Mauricio Chavez, et al.	\$1,376.38
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<b>Subtotal for E118</b>		<b>\$1,376.38</b>
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**Expense Code: E123**

04/04/25	Salesforce, Inc. - Professional Services Salesforce, Inc., Professional services, 4/7/2025 - 4/6/2026.	\$4,029.48
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05/31/25	Gulfstream Legal Group LLC - Professional Services Gulfstream Legal Group LLC, Professionals services, May 2025.	1,352.63
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<b>Subtotal for E123</b>		<b>\$5,382.11</b>
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<b>Total Disbursements</b>		<b>\$6,790.16</b>
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Current Disbursements	6,790.16
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<b>Total Current Fees and Disbursements</b>	<b>\$19,750.16</b>
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Previous Balance	68,758.41
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<b>Total Amount Due</b>	<b>\$88,508.57</b>
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# **Exhibit C**

**Hays Financial Consulting, LLC**

2964 Peachtree Road  
 Suite 555  
 Atlanta, GA 30305-2153

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

**For the Period from 4/1/2025 to 6/30/2025**

July 29, 2025

Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting/Auditing	1.60	441.60
Data Analysis	2.40	662.40
Litigation Consulting	2.50	724.40
Tax Issues	10.80	2,949.00
<b>For professional services rendered</b>	<b>17.30</b>	<b>\$4,777.40</b>

Additional Charges :

Postage	9.70
Tax Return Preparation	50.00
<b>Total costs</b>	<b>\$59.70</b>

<b>Total amount of this bill</b>	<b>\$4,837.10</b>
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**Hays Financial Consulting, LLC**

2964 Peachtree Road  
 Suite 555  
 Atlanta, GA 30305-2153

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

**For the Period from 4/1/2025 to 6/30/2025**

July 29, 2025

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
Dwaine A. Butler	0.30	51.00
	170.00/hr	
James R. Jennings, CPA	10.00	2,760.00
	276.00/hr	
S. Gregory Hays, CTP, CIRA	0.40	144.80
	362.00/hr	
Scott S. Askue	6.60	1,821.60
	276.00/hr	
<b>For professional services rendered</b>	<b>17.30</b>	<b>\$4,777.40</b>

Additional Charges :

Postage		9.70
Tax Return Preparation		50.00
<b>Total costs</b>		<b>\$59.70</b>

**Total amount of this bill**

**\$4,837.10**

**Hays Financial Consulting, LLC**

2964 Peachtree Road  
Suite 555  
Atlanta, GA 30305-2153

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

**For the Period from 4/1/2025 to 6/30/2025**

July 29, 2025

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>	
<b><u>Accounting/Auditing</u></b>				
4/22/2025	SSA	Drafted email to Lisa Ferm regarding quarterly banking reports for quarterly SFAR reports.	0.10 276.00/hr	27.60
4/23/2025	SSA	Prepared SFAR, asset and recovery report and receipts and disbursement report through 3/31/2025.	1.50 276.00/hr	414.00
		Subtotal	1.60	441.60
<b><u>Data Analysis</u></b>				
4/2/2025	SSA	Reviewed files and drafted email to Poston Pritchett regarding leader reports.	0.30 276.00/hr	82.80
5/15/2025	SSA	Researched for information regarding payments to Mauricio Chavez. Formatted and tested data of report.	2.10 276.00/hr	579.60
		Subtotal	2.40	662.40
<b><u>Litigation Consulting</u></b>				
5/1/2025	SSA	Reviewed assessment of payments to and from Giorgio Benvenuto. Drafted email to Poston Pritchett regarding same.	0.90 276.00/hr	248.40
5/19/2025	SGH	Reviewed email from Scott Askue regarding report I prepared in 2022 on distribution to Mauricio Chavez. Responded to email.	0.40 362.00/hr	144.80
	SSA	Drafted email to the Poston Pritchett regarding payments to Mauricio Chavez.	0.30 276.00/hr	82.80
6/4/2025	SSA	Reviewed declaration of the Receiver. Researched for information regarding crypto currency trading.	0.90 276.00/hr	248.40
		Subtotal	2.50	724.40
<b><u>Tax Issues</u></b>				
5/20/2025	JRJ	Reviewed banking activity and Form 2 activity for 2024 for CBT Group LLC. Discussed all banking activity with Scott Askue.	0.90 276.00/hr	248.40
	JRJ	Prepared adjusted trial balance and PI summary for 2024 for CBT Group LLC.	1.80 276.00/hr	496.80
	JRJ	Prepared Federal 1065, Texas return, and K-1 packages for 2024 for CBT Group LLC.	3.90 276.00/hr	1,076.40
	JRJ	Finalized and processed Federal 1065, Texas return, and K-1 packages for 2024 for CBT Group LLC. Sent to Greg Hays for coordination with John Lewis.	1.50 276.00/hr	414.00

**SEC v CryptoFX**

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
5/28/2025	JRJ Reviewed banking activity and Form 2 activity for 2024 for Crypto FX LLC. Discussed all banking activity with Scott Askue. Prepared schedule C summary for dedicated Crypto FX LLC transactions, including interbank transfers from Flagstar to Webster bank. Prepared Schedule C summary for submittal to Receiver and defendant Mauricio Chavez.	1.90 276.00/hr	524.40
	DAB Reviewed 2024 tax return documents and verified execution. Prepared tax return and K-1s for mailing to Receiver John Lewis.	0.30 170.00/hr	51.00
6/13/2025	SSA Drafted email to Jim Jennings and reviewed income tax issues for CBT Group and CryptoFX.	0.50 276.00/hr	138.00
	Subtotal	<hr/> 10.80	<hr/> 2,949.00
	<b>For professional services rendered</b>	<hr/> <b>17.30</b>	<hr/> <b>\$4,777.40</b>

# Exhibit D

**STANDARDIZED FUND ACCOUNTING REPORT for**  
**Receivership in SEC v. Mauricio Chavez, Giorgio Benvenuto and Crypto FX, LLC - Cash Basis**  
**Receivership; Civil Court Docket No. 4:22-cv-3359**  
**Reporting Period 04/01/2025 to 06/30/2025**

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>	\$3,242,223.43		\$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>	\$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
	<i>Total Funds Available (Lines 1-8)</i>	<i>\$3,242,223.43</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	\$1,764,043.55	\$1,764,043.55
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>	\$0.00	\$315,033.55	\$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>\$0.00</b>	<b>\$2,088,084.70</b>	<b>\$2,088,084.70</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>\$0.00</b>	<b>\$2,088,084.70</b>	<b>\$2,088,084.70</b>
<b>Line 13</b>	<b>Ending Balance (As of 06/30/2025):</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>

<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 Eleventh Certified Interim Fee Application. Accordingly, the Court finds and determines as follows:

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

(b) The Receiver's Retained Professionals be awarded fees incurred during the Eleventh Interim Fee Application as follows: The Receiver for a total of \$2,467.50; Shook Hardy & Bacon, LLC (SHB) for a total of \$19,750.16, which includes current fees of \$12,960.00 and the out-of-pocket costs and expenses already paid by SHB in the amount of \$6,790.16; and Hays Financial Consulting, LLC for \$4,837.10; and

(c) The out-of-pocket costs and expenses incurred by the Receiver in the ordinary course of the administration and operation of the Receivership, as set out more fully in the FCIFA in the aggregate amount of \$6,790.16 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