

2. This is the Twelfth 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 covering the period from October 1, 2024 to December 31, 2024, which was granted by the Court on May 12, 2025, the Receiver filed his 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, and the Receiver filed his eleventh certified fee application

covering the period from April 1, 2025 to June 30, 2025, which was granted by the Court on September 17, 2025.

3. The fees incurred during the Application Period by the Receiver and professionals retained by the Receiver and for which payment is requested, are as follows: \$5,355.00 Receiver (*see* Receiver Invoice attached as **Exhibit A**); \$9,050.00 Shook, Hardy & Bacon L.L.P. (“SHB”) (*see* SHB Invoice attached as **Exhibit B**); \$358.80 Hays Financial Consulting, LLC (“Hays”) (*see* Hays Invoice attached as **Exhibit C**). Further, SHB’s fees have been reduced by \$2,513.78 and the Receiver’s fees have been reduced by \$1,995.00.

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 \$5,355.00; to Shook Hardy and Bacon, LLP in the amount of \$9,050.00; and to Hays in the amount of \$358.80. 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 \$4,073.72.

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 (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:

Asset	Estimated Amount/Value
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**

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
10.20	<i>See Ex. A</i>	\$5,355.00	\$0	\$5,355.00

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

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
21.50	<i>See Ex. B</i>	\$9,050.00	\$4,073.72	\$13,123.72

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

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
1.4	<i>See Ex. C</i>	\$358.80	\$0	\$358.80

24. The Receiver asks the Court to approve payments to Receiver, on an interim basis in the amount of \$5,355.00 for the Application Period. The Receiver asks the Court to approve

payments to SHB, on an interim basis in the amount of \$13,123.72 for the Application Period. The Receiver asks the Court to approve payments to Hays in the amount of \$358.80 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.

Task Description	Hours Worked	Total Fees
Case Administration	15.50	\$2,835.00
Claims Administration	6.60	\$2,520.00

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

Task Description	Hours Worked	Total Fees
Asset Disposition	6.30	\$2,677.50
Case Administration	18.90	\$680.00
Claims Administration	3.00	\$1,275.00
Status Reports	4.20	\$382.50
Litigation Consulting	3.30	\$1,402.50
Litigation	6.80	\$2,632.50

Receiver's Accountant, Hays Financial Consulting, LLC

Task Description	Hours Worked	Total Fees
Accounting	0.70	\$193.20
Claims Administration & Objections	0.60	\$165.60
Fee / Employment Applications & Objection	1.40	\$0

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 \$2,513.78 and the Receiver by \$1,995.00. 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 Twelfth 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.

- k. Activation of claims portal website with 38,789 outreaches made to victims including 25,722 text messages and 13,067 emails.
- l. Assisting FBI with criminal prosecution and investigation of individuals.
- 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 Twelfth 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:

32. 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 Twelfth Interim Fee Application as follows: the Receiver \$5,355.00; Shook Hardy & Bacon, LLC for \$9,050.00; and Hays for \$358.80.
- 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 \$4,073.72 are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

CONCLUSION

33. Based on the foregoing, the Receiver respectfully requests that the Court enter an order approving the Receiver's Twelfth 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 \$5,355.00; (2) to Shook Hardy & Bacon, LLC for \$9,050.00; and (2) to Hays for \$358.80.

34. 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 \$4,073.72.

Dated: November 25, 2025

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/Megan Mitchell
Megan J. Mitchell

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Megan J. Mitchell
Texas Bar No. 24108103
S.D. Tex. Bar No. 3435473
mjmitchell@shb.com

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

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he has conferred with counsel for Plaintiff United States Securities and Exchange Commission (“SEC”), and the SEC does not oppose this Application and supports granting the relief requested herein.

/s/Megan Mitchell

Megan J. Mitchell

CERTIFICATE OF SERVICE

I hereby certify that on this 25 November 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.

Matthew J. Gulde
United States Securities
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Fort Worth, TX 76102
Telephone: 817.978.1410
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/s/Megan Mitchell

Megan J. Mitchell



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: 3151641
Invoice Date: 11/07/2025
Matter Number: 33206.393697
Billing Attorney: John Lewis Jr.

Summary of Invoice

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

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

Current Fees	\$5,355.00
Total Amount Due	\$5,355.00

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 September 30, 2025 may not be reflected herein.



33206.393697 3151641 11/07/2025

Invoice Detail

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

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC04 Case Admin				
07/11/25	JLJ	Return call with investors on CFX regarding status of receivership. Respond to questions.	1.20	\$630.00
07/21/25	JLJ	Exchanges with CMG regarding final inputs into claims approval and claims portal.	0.40	210.00
07/24/25	JLJ	Review and write offs per SEC guidelines	0.80	No Charge
07/31/25	JLJ	Review and edit 9th Status Report to Court with financial exhibits, Review and approval final Motion to approve claims approval and bar date. Exchanges with M. Mitchell and C. Gieser regarding upcoming deadlines.	2.20	1,155.00
08/06/25	JLJ	Inquiries regarding sorting out receivership Salesforce account from firm Salesforce account. Skim and verify expenses and case administration follow up items.	3.00	No Charge
08/22/25	JLJ	Consideration of review and approval guidelines for victims claims as launch of proof of claim form release proceeds.	0.80	420.00
08/25/25	JLJ	Call and email to P. Flack. Confer internally regarding claimed attorneys fees.	0.80	420.00
09/01/25	JLJ	Attention to existing fee applications and approvals. Call with A. Talbot et al regarding CFX and firm Salesforce accounts. Calls and emails with M. Mitchell and team regarding same. Review of 12th fee application and related exhibits.	3.50	0.00
09/02/25	JLJ	Research in preparation for internal call (Talbot, Ruskamp, Tanner) related to the apparent confusion of receivership Salesforce account with firm marketing Salesforce account over time. - Following call, investigative discussions with receivership team to fact gather and confirm continued need of receivership Salesforce account and the potential need of Court approval to disable receivership Salesforce crypto account and purge business record data.	2.80	0.00
Subtotal for SEC04 Case Admin			15.50	\$2,835.00
SEC05 Claims Admin				
07/08/25	JLJ	Exchanges w. CG regarding bar date court approval	0.30	\$157.50



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		and coordination with SEC.		
07/10/25	JLJ	Review status of work on claims portal and related motion for court approval.	1.80	No Charge
07/25/25	JLJ	Finalize review of claims pleadings and forms.	0.80	420.00
08/01/25	JLJ	Final review, edits and approval of 11th status report to court.	0.80	420.00
08/04/25	JLJ	Calls and emails regarding SEC proposed edits to claims process motion.	1.60	840.00
08/07/25	JLJ	Review final edits to claims process motion with SEC comments incorporated.	0.60	315.00
08/15/25	JLJ	Final turns of claims motion and approval for filing.	0.70	367.50
Subtotal for SEC05		Claims Admin	6.60	\$2,520.00
Total			22.10	\$5,355.00

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	10.20	\$525.00	\$5,355.00
Total Fees		10.20		\$5,355.00

Total Amount Due**\$5,355.00**



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: 3151642
Invoice Date: 11/07/2025
Matter Number: 33206.389768
Billing Attorney: John Lewis Jr.

Summary of Invoice

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

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

Current Fees	\$9,050.00
Current Disbursements	4,073.72
Total Amount Due	\$13,123.72

REMITTANCE INFORMATION

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

Wiring Instructions

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

Remit Address

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

Federal Tax ID:

44-0585497

Payments received after September 30, 2025 may not be reflected herein.



33206.389768 3151642 11/07/2025

Invoice Detail

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

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC02 Asset Disposition				
07/02/25	CMG	Communicate with Lisa Ferm regarding claims portal.	0.10	\$42.50
07/07/25	CMG	Review potential claim form to be used.	0.30	127.50
07/10/25	CMG	Review revised claim form.	0.20	85.00
07/22/25	CMG	Revise claims process approval motion.	0.60	255.00
07/31/25	CMG	Revise motion to approve asset distribution plan.	1.00	425.00
08/26/25	MJM	Correspond with Selena re: Round Moon property.	0.30	127.50
08/27/25	CMG	Communicate with claims portal company regarding claims website	0.10	42.50
08/28/25	CMG	Draft FAQs for the claims website.	0.40	170.00
08/28/25	CMG	Communicate with claims portal company regarding bar date.	0.10	42.50
08/31/25	CMG	Revise FAQs for claim's website.	0.30	127.50
09/02/25	MJM	Analysis re: fees for Flack for Benvenuto.	0.30	127.50
09/02/25	MJM	Draft email to Sonila re: Round Moon property, read Angelica Vargas transcript, review emails re: Round Moon acquisition and sale.	2.40	1,020.00
09/12/25	CMG	Communicate with Lisa Ferm regarding claims website.	0.20	85.00
Subtotal for SEC02 Asset Disposition			6.30	\$2,677.50
SEC04 Case Admin				
07/08/25	PEP	Confer with M. Mitchell regarding numerous action items.	0.20	\$85.00
07/17/25	MJM	Correspond with R. Crum re: pro formas.	0.20	No Charge
07/18/25	MJM	Correspond with R. Crum re: pro formas and meeting re: same.	0.60	No Charge
07/21/25	MJM	Correspond with R. Crum re: pro formas and meeting re: same.	0.10	No Charge
07/23/25	MJM	Correspond with R. Crum re: invoices.	0.80	No Charge
07/24/25	MJM	Correspond with R. Crum re: pro formas.	0.50	No Charge
07/24/25	MJM	Strategic analysis re: pro formas.	0.80	No Charge
07/29/25	MJM	Strategic analysis re: pro formas.	0.30	No Charge
08/01/25	PEP	Attention to call from victim.	0.20	85.00
08/19/25	PEP	Attention to long lead action items.	0.20	85.00
08/19/25	MJM	Respond to correspondence, listen to voice mail and talk to victim regarding her contract and contract for her sister and daughter.	0.30	127.50



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08/20/25	MJM	Draft fee app. and discuss with R. Crum.	1.30	No Charge
08/20/25	MJM	Review previous fee apps and orders and process and discuss with Selena.	0.60	No Charge
08/21/25	MJM	Review previous fee apps and orders and process and discuss with Selena.	0.30	No Charge
08/21/25	MJM	Attention to fee app.	0.40	No Charge
08/21/25	MJM	Attention to fee app.	0.30	No Charge
08/22/25	MJM	Attention to fee app.	1.50	No Charge
08/22/25	MJM	Review previous fee apps and orders and process and discuss with Selena.	0.30	No Charge
08/28/25	PEP	Consider further thoughts regarding Chavez request for fees.	0.20	85.00
08/28/25	MJM	Review previous fee apps and orders and process and discuss with Selena.	1.50	No Charge
08/29/25	MJM	Review previous fee apps and orders and create table analysis.	0.30	No Charge
08/30/25	MJM	Review previous fee apps and orders and draft recommendations.	1.30	No Charge
08/31/25	MJM	Review previous fee apps and orders and draft recommendations.	2.10	No Charge
09/02/25	MJM	Final edits to eleventh fee app, prepare exhibits and send to SEC for approval.	1.10	No Charge
09/02/25	MJM	Correspond with Randy re: fee app 4.	0.40	No Charge
09/02/25	MJM	Correspond with Sonila and Selena re: Round Moon property.	0.30	127.50
09/02/25	MJM	Correspond with John and Poston re: fee apps and review edits to table.	1.10	No Charge
09/02/25	MJM	Correspond with John and Selena re: CFX Master Services Agreement.	0.20	85.00
09/02/25	MJM	Call with John re: fee apps.	0.20	No Charge
09/03/25	MJM	Correspond with Randy and Scott re: fee app 4 and talk to Selena re: same.	0.60	No Charge
09/05/25	MJM	Talk to Randy about fee apps and orders.	0.50	No Charge
09/10/25	MJM	Talk to Randy about wires.	0.10	No Charge
09/15/25	MJM	Follow-up with SEC about fee app.	0.10	No Charge
Subtotal for SEC04	Case Admin		18.90	\$680.00

SEC05 Claims Admin

08/01/25	MJM	Talk to victim re: claims and update and multiple emails re: same.	0.30	\$127.50
08/25/25	MJM	Review email re: claims admin.	0.10	42.50
08/27/25	PEP	Review next steps for portal in light of court order.	0.20	85.00
08/29/25	PEP	Review proposed frequently asked questions.	0.20	85.00
09/03/25	PEP	Analyze outstanding issues associated with claims administration.	0.20	85.00
09/03/25	PEP	Further review of comments regarding FAQ's and portal roll-out.	0.20	85.00
09/17/25	PEP	Analyze communications regarding notice to individuals and respond to same.	0.20	85.00
09/17/25	MJM	Correspondence re: claims portal.	0.10	42.50
09/22/25	MJM	Discussion with Diana re: California victims and	0.50	212.50



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claims process and email re: same.

09/23/25	MJM	Analyze spreadsheet and correspondence re: same.	0.90	382.50
09/24/25	MJM	Email re: claims website.	0.10	42.50
Subtotal for SEC05			3.00	\$1,275.00

SEC11 Status Reports

07/30/25	CMG	Revise motion for final approval.	0.50	\$212.50
08/27/25	PEP	Review and consider P. Flack request for attorneys fees.	0.40	170.00
08/28/25	PEP	Revise fee application.	0.40	No Charge
09/02/25	PEP	[No Charge] Attention to fee application inquiries.	0.40	No Charge
09/15/25	MJM	Email with SEC re: fee app, and file fee app.	0.80	No Charge
09/15/25	MJM	Email with SEC re: fee app, and file fee app.	0.20	No Charge
09/16/25	MJM	Email with SEC re: fee app, and file fee app.	0.20	No Charge
09/16/25	MJM	Correspond with Selena re: fee app.	0.10	No Charge
09/16/25	MJM	Edits to draft order for fee app.	0.30	No Charge
09/16/25	MJM	Draft proposed order re: fee app.	0.40	No Charge
09/16/25	MJM	Make edits to fee app.	0.30	No Charge
09/19/25	MJM	Emails re: fee app.	0.20	No Charge
Subtotal for SEC11			4.20	\$382.50

SEC12 Litigation Consulting

07/08/25	MJM	Correspond with Poston re: case updates.	0.10	\$42.50
07/25/25	MJM	Review motion, issue with title, exhibit and draft order and prep for filing.	0.80	340.00
07/30/25	MJM	Correspond with California community partners.	0.20	85.00
07/31/25	MJM	Correspond with multiple people regarding status report, make edits to status and file.	1.90	807.50
07/31/25	MJM	Correspond with California community partners.	0.30	127.50
Subtotal for SEC12			3.30	\$1,402.50

SEC13 Litigation

08/07/25	PEP	Review comments to motion.	0.20	\$85.00
08/08/25	PEP	Review motion and respond to comments from M. Gulde.	0.30	127.50
08/18/25	MKF	Preparation of materials to be added to the Receiver's website.	2.50	975.00
08/27/25	PEP	Confer with P. Flack regarding motion to approve plan.	0.20	85.00
09/11/25	PEP	Analyze victim filing.	0.20	85.00
09/12/25	MJM	Review filing and strategic next steps.	0.20	85.00
09/15/25	MJM	Call with former girlfriend of defendant re: case information.	0.80	340.00
09/17/25	PEP	Communication with P. Flack regarding representation of Chavez.	0.20	85.00
09/17/25	MJM	Discussion with Selena re: filing by Ms. Guzman and follow-up re: same.	0.80	340.00
09/17/25	MJM	Email re: fee app.	0.10	No Charge
09/17/25	MJM	Emails and conversations re: receivership email	0.50	212.50



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account and meeting with 3rd party who filed document on docket.

09/17/25	MJM	Discussion re: fees for parties.	0.20	No Charge
09/23/25	MJM	Correspond with Mia and Selena re: MSA.	0.20	85.00
09/23/25	MJM	Email re: fee app.	0.10	No Charge
09/24/25	MJM	Correspond with Mia and Selena re: MSA.	0.20	85.00
09/30/25	MJM	Correspond with Mia and Selena re: MSA.	0.10	42.50
Subtotal for SEC13 Litigation			6.80	\$2,632.50
Total			42.50	\$9,050.00

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
CMG	Caroline M. Gieser	3.80	\$425.00	\$1,615.00
PEP	Poston E. Pritchett	3.30	425.00	1,402.50
MJM	Megan J Mitchell	11.90	425.00	5,057.50
MKF	Mia K. Fleming	2.50	390.00	975.00
Total Fees		21.50		\$9,050.00

Disbursements

Date	Description	Amount
Expense Code: E106		
08/31/25	Pacer	\$1.70
Subtotal for E106		\$1.70
Expense Code: E108		
07/08/25	Special Postage	\$14.13
Subtotal for E108		\$14.13
Expense Code: E118		
06/30/25	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for June 2025, related to SEC v. Mauricio Chavez, et al.	\$1,352.63
08/31/25	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for August 2025, related to SEC v. Mauricio Chavez, et al.	1,352.63
Subtotal for E118		\$2,705.26
Expense Code: E123		
07/31/25	Gulfstream Legal Group LLC - Professional Services Gulfstream Legal Group LLC, Professional services	\$1,352.63
Subtotal for E123		\$1,352.63
Total Disbursements		\$4,073.72

Current Disbursements 4,073.72



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Total Amount Due

\$13,123.72



Hays Financial Consulting LLC

2964 Peachtree Road
 Suite 555
 Atlanta, GA 30305
 404-926-0060

November 07, 2025

SEC v CryptoFX
 John Lewis, Receiver

Invoice Period: 07-01-2025 - 09-30-2025

Professional Services

Date	Professional	Description	Hours	Rate	Amount
<u>Accounting/Auditing</u>					
07-29-2025	Scott S. Askue	Reviewed transactions and prepared SFAR and sources and uses report for period ending 6/30/25.	0.70	276.00	193.20
			0.70		193.20
<u>Claims Administration & Objections</u>					
07-30-2025	Scott S. Askue	Reviewed and replied to email from Caroline Gieser regarding language in claims administration plan.	0.30	276.00	82.80
09-03-2025	Scott S. Askue	Reviewed and commented on frequently asked questions section of claims website.	0.30	276.00	82.80
			0.60		165.60
<u>Fee / Employment Applications & Objection</u>					
07-29-2025	Scott S. Askue	Prepared fee invoice.	0.40	276.00	No Charge
09-03-2025	Scott S. Askue	Prepared analysis of payments to professionals for the 9th and 10th fee application periods. Investigated other outstanding fees.	0.50	276.00	No Charge
09-19-2025	Scott S. Askue	Prepared analysis of payments to professionals for the 9th, 10th and 11th fee application periods. Drafted email to the Receiver regarding same.	0.50	276.00	No Charge
			1.40		0.00
		Total	2.70		358.80

Professional Services

Professional	Hours	Rate	Amount
Scott S. Askue	2.70	132.89	358.80
Total			358.80
Task	Hours	Rate	Amount
Accounting/Auditing	0.70	276.00	193.20
Claims Administration & Objections	0.60	276.00	165.60
Fee / Employment Applications & Objection	1.40	0.00	0.00
		Total Fees	358.80
Total for this Invoice			358.80

STANDARDIZED FUND ACCOUNTING REPORT for
Receivership in SEC v. Mauricio Chavez, Giorgio Benvenuto and Crypto FX, LLC - Cash Basis
Receivership; Civil Court Docket No. 4:22-cv-3359
Reporting Period 07/01/2025 to 09/30/2025

FUND ACCOUNTING (See Instructions:)				
		<u>Detail (for Current Period)</u>	<u>Subtotal (From Prior Period)</u>	<u>Grand Total (All Periods)</u>
Line 1	Beginning Balance	\$3,242,223.43		\$0.00
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 3	Cash and Securities	\$0.00	\$3,479,325.73	\$3,479,325.73
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$0.00	\$1,160,105.27	\$1,160,105.27
Line 6	Personal Asset Liquidation	\$0.00	\$163,529.93	\$163,529.93
Line 7	Third-Party Litigation Income	\$0.00	\$0.00	\$0.00
Line 8	Miscellaneous - Other (Attorney Escrows)	\$0.00	\$527,347.20	\$527,347.20
	<i>Total Funds Available (Lines 1-8)</i>	<i>\$3,242,223.43</i>		<i>\$5,330,308.13</i>
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors	\$0.00	\$0.00	\$0.00
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	\$0.00	\$1,764,043.55	\$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
	Total Third-Party Litigation Expenses	\$0.00	\$0.00	\$0.00
Line 10f	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.00
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursements for Receivership Operations	\$0.00	\$2,088,084.70	\$2,088,084.70
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	Total Plan Development Expenses	\$0.00	\$0.00	\$0.00
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
	Total Plan Implementation Expenses	\$0.00	\$0.00	\$0.00
	Total Disbursements for Distribution Expenses Paid by the Fund			
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$0.00	\$0.00	\$0.00
Line 12b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursement to Court/Other:	\$0.00	\$0.00	\$0.00
	Total Funds Disbursed (Line 9-11):	\$0.00	\$2,088,084.70	\$2,088,084.70
Line 13	Ending Balance (As of 09/30/2025):	\$3,242,223.43		\$3,242,223.43

Line 14	Ending Balance of Fund - Net Assets:			
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
	Total Ending Balance of Fund - Net Assets	\$3,242,223.43	\$0.00	\$3,242,223.43

OTHER SUPPLEMENTAL INFORMATION:				
		<u>Detail</u>	<u>Subtotal</u>	<u>Grand Total</u>
Line 15	Report of Items NOT To Be Paid by the Fund:			
	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 15a	Plan Development Expenses Not Paid by the Fund:			
	1. Fees:	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	<i>Total Plan Development Expenses Not Paid by the Fund</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
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
	<i>Total Plan Implementation Expenses Not Paid by the Fund</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Line 15c	<i>Tax Administrator Fees & Bonds Not Paid by the Fund</i>	\$0.00	\$0.00	\$0.00
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			
Line 16	Disbursements to Court/Other Not Paid by the Fund:			
Line 16a	Investment Expenses/CRIS Fees	\$0.00	\$0.00	\$0.00
Line 16b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total disbursements to Court/Other Not Paid by the Fund:			
Line 17	DC & State Tax Payments	\$0.00	\$0.00	\$0.00
Line 18	No. of Claims:			
Line 18a	# of Claims Received This Reporting Period			0
Line 18b	# of Claims Received Since Inception of Fund			0
Line 19	No. of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid This Reporting Period			0
Line 19b	# of claimants/Investors Paid Since Inception of Fund			0

Receiver:

By: _____
(signature)

(printed name)

(title)

Date: _____

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

(a) The Receiver's Twelfth 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 Twelfth Interim Fee Application as follows: The Receiver for a total of \$5,355.00; Shook Hardy & Bacon, LLC (SHB) for a total of \$13,123.72, which includes current fees of \$9,050.00 and the out-of-pocket costs and expenses already paid by SHB in the amount of \$4,073.72; and Hays Financial Consulting, LLC for \$358.80; 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 \$4,073.72 are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

IT IS SO ORDERED this ____ day of _____, 2025.

JUDGE ANDREW S. HANEN
UNITED STATES DISTRICT JUDGE