

Receivership Order authorizes the Receiver without further order of this Court to, among other things, engage and employ professionals. *See* Receivership Order at ¶ 7(f). However, in the interest of transparency, and out of abundance of caution, the Receiver seeks this Court’s approval, with notice to all parties of record, including the SEC, for leave to employ BlockTrace as a Retained Personnel, as defined in the Receivership Order. *See* Receivership Order at ¶ 56.

3. The Receiver seeks permission to employ BlockTrace, LLC and its Director of Investigations James Daniels (“Daniels”) to assist him in effectively carrying out his duties under the Receivership Order.

4. BlockTrace specializes in blockchain forensics and analytical services. The company is based in Austin, TX.¹ Daniels has served as Director of Investigations for BlockTrace since October 2020. Daniels has several years of experience in cryptocurrency tracing and related investigations. He worked as a Special Agent with the Internal Revenue Service, Criminal Investigation (“IRS-CI”) for 25 years from 1995 through 2020, and since 2016 was responsible for the program areas of cryptocurrency and the dark web.

5. The Receiver proposes, with approval of this Court, to compensate BlockTrace and Daniels on an hourly basis. The firm will charge an hourly rate of \$360, which represents a 15% discount from the company’s standard hourly rate of \$425.

6. The Receiver and other Retained Personnel will seek compensation and expense reimbursement upon approval of the Court and as further described in the Receivership Order.

7. BlockTrace and Daniels do not represent any other party to this case and, based on the information currently available, do not represent any other person or entity with an interest in

¹ <https://www.blocktrace.com/>

this matter. A Declaration Pursuant to Order Appointing Receiver signed by James Daniels, Director of Investigations for BlockTrace, is attached as Exhibit “A.”

ACCORDINGLY, the Receiver, John Lewis. Jr., requests that the Court enter an order permitting him to retain BlockTrace and Daniels as set forth herein.

Dated: January 3, 2023

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Sonila Themeli

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CERTIFICATE OF CONFERENCE

I hereby certify that that I have conferred with Plaintiff's counsel as well as counsel for Defendant Mauricio Chavez and counsel for Defendant Giorgio Benvenuto regarding this Motion. All counsel have stated that they are not opposed to the relief requested in this Motion.

/s/ Sonila Themeli _____

Sonila Themeli

CERTIFICATE OF SERVICE

I hereby certify that on this the 3rd day of January, 2023, 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 as follows:

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/s/ Sonila Themeli

Sonila Themeli


EXHIBIT A

DECLARATION PURSUANT TO ORDER APPOINTING RECEIVER (Doc. No. 11)

The Undersigned hereby declares under penalty of perjury:

1. I am the Director of Investigations for BlockTrace, LLC, a company based in Austin, Texas.
2. BlockTrace requests Court approval to be retained as cryptocurrency consultants to John Lewis, Jr., in his capacity as Court-Appointed Receiver in this case. To the best of my knowledge, after formal conflict check, BlockTrace has no professional, business or other connection to any party in this matter. Further, BlockTrace represents no interest adverse to this Receivership estate in connection to the matters upon which BlockTrace is to be engaged.
3. Pursuant to the Receivership Order, BlockTrace will not expect or receive any compensation from the Receivership Estate except upon application to and approval by the Court.

This 3rd day of January, 2023.



James Daniels

