

2. This is the second fee application that the Receiver has made. 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).

3. The total fees incurred during the Application Period by the Receiver and professionals retained by the Receiver are as follows: \$46,672.50 John Lewis, Jr. (*see* Receiver's Invoice attached as **Exhibit A**); \$323,534.50 Shook, Hardy & Bacon L.L.P. ("SHB") (*see* SHB Invoice attached as **Exhibit B**); 1,079.5 Pugh Accardo, LLC ("Pugh Accardo") (*see* Pugh Accardo Invoices attached as **Exhibit C**); and \$102,809.40 Hays Financial Consulting, LLC ("Hays") (*see* Hays Invoice attached as **Exhibit D**).¹ The Receiver's professional fees listed above have been reduced by \$3,360.00 from a total of \$50,032.50. Further, SHB's fees have been reduced by \$39,907.50 from a total incurred fees of \$363,442.00.

4. The Receiver served a copy of this SCIFA, together with all exhibits and billing information to counsel for the SEC. The Receiver and counsel for the SEC have conferred about the SCIFA 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 SCIFA as follows: to the Receiver in the amount of \$46,672.50; to Shook Hardy and Bacon, LLP in the amount of \$323,534.50; Pugh Accardo in the amount of \$1,079.50; and to Hays in the amount of \$102,809.40. The Receiver

¹ In addition, BlockTrace, Inc., the cryptocurrency consultants retained by the receiver have incurred \$153,090.00 in fees during the application period. The Receiver will file a separate fee application for the fees incurred by BlockTrace, Inc. along with BlockTrace interim report and analysis of the tracing of CryptoFX-related cryptocurrency transactions.

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 \$23,623.19.

STANDARDIZED FUND ACCOUNTING REPORT

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

CASE STATUS

7. Cash on Hand: The Receivership Estate has \$3,589,050 deposited in four trust accounts named for each of the Defendants as of the end of the Application Period (March 31, 2023). These funds were received by (i) taking possession of cash located at the Defendants’ office located at 1124 Blalock, Houston, Texas 77055 (\$53,345.56); (ii) taking possession of safes located at the Defendants’ office (\$392,765.37); (iii) taking possession of First Community Credit Union bank accounts owned by Benvenuto (\$451,448.14); (iv) taking possession of Bank of America bank accounts owned by Benvenuto (\$21,325.14); (v) taking possession of a Simmons bank account owned by Benvenuto (\$80,763.55); (vi) taking possession of a Simmons bank account owned by CBT (\$247,916.46); (vii) taking possession of a Regions bank account owned by Chavez (\$781.62); (viii) proceeds from liquidating Coinbase, Inc. account (\$982,924.31); (ix) proceeds from liquidating Blockchain.com account (\$1,161,140.95); (x) taking possession of the balance of a retainer from Burford Perry LLC (\$155,631.00); (xx) taking possession of the balance of retainers from Gerger Hennessy & Martin LLP (\$214,487.50); taking possession of the balance of retainers from Jones Walker LLP (\$102, 228.70); taking possession of CryptoFX funds turned over by Defendant Mauricio Chavez (\$55,000); proceeds from liquidating real property at 0 Hogan Lane (\$64, 758.11); and proceeds from liquidating televisions (\$3,040.00). *See* Schedule of Receipts and Disbursements, attached as **Exhibit F**.

8. All four Receivership trust accounts are held with Flagstar Bank, N.A., a wholly-owned subsidiary of New York Community Bankcorp, Inc. The four trust accounts were previously held with Signature Bank, N.A., which was acquired by Flagstar in March 2023. Flagstar acquired all deposits of Signature Bank. 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, Flagstar 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 (March 31, 2023), the Receiver has on hand the following assets.

Asset	Estimated Amount/Value
2021 Mercedes-Benz GLE AMG	\$60,000
2022 BMW X6 M50i (not fully paid off)	\$30,000
2020 Volkswagen Tiguan	\$15,000
Various Laptops and desktop computers	\$5,000
Real Property: Mack Washington, Hempstead, TX	\$1,080,000
Real Property: 28 Lawrence Marshall, Dr. Hempstead, TX	\$68,000
Bitcoin (BTC)	\$14,031.12
Tether (USDT)	\$62,923.86
Solana (SOL)	\$.10

10. It is the Receiver's plan to prudently market real estate and other assets of the Receivership for the highest prices obtainable. The Court approved the Receiver's Motions to Approve the Sale of real property located at 0 Hogan Lane and 28 Lawrence Marshall Dr. (Doc. Nos. 57, 62). The estate netted \$64,758.11 from the sale of Hogan Lane. The Receiver expects the sale of the Lawrence Dr. property to net a similar amount. (The lots are of a similar size and condition). Additionally, the Court granted the Receiver's Motion to approve the sale of personal

property relating to Chavez's 2020 Volkswagen Tiguan, (Doc. No. 67) as well as the sale of Chavez's Mercedes and BMW (Doc. No. 70). The BMW was financed through Santander Consumer USA and has a current payoff amount of approximately \$37,000. The Receiver anticipates to net approximately \$30,000 from the sale of the BMW and approximately \$60,000 from the sale of the Mercedes.

11. 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.

12. Expenses: The Receiver and his team have incurred administrative expenses in the amount of \$23,623.19 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$23,294.14 were advanced by SHB, which constitutes a \$20,634.60 reduction from the \$43,928.74 actually incurred by SHB. Pugh Accardo incurred \$.30, and Hays and \$328.75 in administrative expenses during the relevant period. *See Exhibits B* (SHB fees and expenses), *D* (Pugh Accardo fees and expenses) and *E* (Hays fees and expenses).

13. Investor/Creditor Claims: At this point, the Receiver has not promulgated a claims procedure or determined the validity of any possible investor 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.

14. 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.

15. At this early stage, it is difficult to predict how long it will take the Receiver to complete his work. As the Receivership moves forward, the Receiver and his team will continue their efforts to most efficiently recover and realize the value of assets for the benefit of the Receivership Estate.

16. Receiver Claims: The Receiver's investigation of claims against third parties is in its early stages. 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 will have substantial causes of action against these third parties.

17. Additionally, because the Ponzi scheme was primarily a cash-based scheme, it is going to require significant forensic and/or investigatory resources 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.

18. 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.

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

FEE APPLICATION

20. 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).

21. 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. The Court entered orders authorizing the Receiver to employ Pugh Accardo as Louisiana counsel on November 10, 2022 (Doc. No. 29), and BlockTrace Inc. as cryptocurrency consultants on January 5, 2023 (Doc. No. 43).

22. 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.

23. The hours worked, hourly billing rate, and total fees of the Receiver are listed in **Exhibit A**. The flat hourly billing rate of the Receiver is \$525.00.

24. 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.

25. The names, hours worked, hourly billing rates, and total fees of all Pugh Accardo professionals who have billed time to this matter are listed in **Exhibit C**. The hourly billing rate for partner-level work for attorneys at Pugh Accardo is \$350.00 and \$225.00 for other attorneys working on this matter. The billing rate of Pugh Accardo timekeepers who are not attorneys is their standard rate.

26. The names, hours worked, hourly billing rates, and total fees of all Hays professionals who have billed time to this matter are listed in **Exhibit D**.

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

Receiver- Fees for Application Period

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
88.90	<i>See Ex. A</i>	\$46,672.50	\$0	\$46,672.50

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
797	<i>See Ex. B</i>	\$323,534.50	\$23,294.14	\$346,828.64

Receiver's Counsel, Pugh Accardo, LLC – Fees and Expenses for Application Period

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
5.80	<i>See Ex. C</i>	\$1,079.50	\$.30	\$1,079.80

Receiver's Forensic Accounting Consultant, Hays Financial Consulting, LLC - Fees and Expenses for Application Period

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
391	See Ex. D	\$102,809.40	\$328.75	\$103,138.15

28. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$346,828.64 for the Application Period. The Receiver asks the Court to approve payments to the Receiver, on an interim basis in the amount of \$46,672.50 for the Application Period. The Receiver asks the Court to approve payment to Pugh Accardo, on an interim basis in the amount of \$1,079.80 for the Application Period. The Receiver asks the Court to approve payment to Hays, on an interim basis in the amount of \$103,138.15 for the Application Period.

29. 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
Asset Analysis	4.30	\$2,257.50
Asset Disposition	15.50	\$8,137.50
Valuation	17.30	\$9,082.50
Case Administration	21.10	\$11,077.50
Status Reports	4.70	\$2,467.50
Litigation	14.30	\$7,507.50
Claims Administration	7.10	\$3,727.50
Litigation Consulting	4.60	\$2,415.00

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

Task Description	Hours Worked	Total Fees
Asset Analysis	118.10	\$50,192.50
Asset Disposition	86.60	\$36,805.00
Business Operations	3.40	\$1,445.00

Case Administration	282.40	\$119,341.50
Valuation	16.50	\$4,366.50
Status Reports	8.90	\$3,782.50
Litigation	230.70	\$90,199.50
Claims Administration	1.00	\$425.00
Litigation Consulting	19.40	\$8,171.50
Business Analysis	13.90	\$5,907.50
Data Analysis	16.10	\$2,898.00

Receiver's Louisiana Counsel, Pugh Accardo, LLC

Task Description	Hours Worked	Total Fees
Litigation Consulting	5.80	\$1,079.50

Receiver's Forensic Accounting Consultant, Hays Financial Consulting, LLC

Task Description	Hours Worked	Total Fees
Accounting	7.4	\$2,042.40
Asset Analysis & Recovery	58.50	\$15,355.20
Asset Disposition	2.40	\$722.60
Business Analysis	88.10	\$17,218.40
Case Admin	42.80	\$14,093.00
Claims Admin & Objections	1.10	\$398.20
Data Analysis	59.30	\$16,071.40
Forensic Accounting	34.40	\$10,403.80
Litigation Consulting	60.60	\$19,993.60
Status Reports	9.50	\$3,249.80
Tax Issues	5.60	\$1,545.60
Employee Benefits/ Pensions	5.70	\$1,232.60

ARGUMENT AND AUTHORITES IN SUPPORT OF APPLICATION

30. 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.”

31. 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:

32. Time and Labor Required: The Receiver and his 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 the Receiver in connection with the administration of the Receivership;
- Exhibit B demonstrates professional fees (including (i) the date the services were rendered, (ii) the nature of the services rendered, (iii) the time required for the performance of such services, and (iv) the fees charged for each service rendered and expenses of 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 Pugh Accardo in connection with the administration of the Receivership;
- Exhibit D 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;

- Certification of John Lewis, Jr. stating the reasonableness of the rates charged and hours billed by professionals at SHB, Pugh Accardo, and Hays.

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.

33. Customary Fees for the Type of Services Rendered: SHB, Pugh Accardo, and Hays 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. Further, Hays' rate of \$362.00 per hour for Greg Hays and \$170.00 to \$276.00 per hour for other professionals is a 15% discount from the standard hourly rate of \$200.00 to \$425.00 per hour.

34. In addition, the Receiver's professional fees listed above have been reduced by \$3,360.00 from a total of \$50,032.50. And, SHB's fees have been reduced by \$39,907.50 from a total incurred fees \$363,442.00.

35. Moreover, during the Application period, several members of the Receiver's team have worked approximately 135 hours recording emails and communications from investors; translating emails and calls from investors from Spanish to English and vice versa; assisting during

interviews with CryptoFX employees and investors; maintaining intake spreadsheets; assisting with subpoenas and recording of *lis pendens* notices; research of third party assets; as well as other tasks. The standard SHB rate for these services is \$350/hour. In addition to the reduction of his fees and those of SHB as stated above, as well as the reduction of the expenses incurred by SHB, for the benefit of the investors in this case, the Receiver has not billed the estate for these additional services performed by his team.

36. SHB's expenses \$23,294.14 are billed with no mark-up added and constitute a \$20,634.60 reduction from the \$43,928.74 actually incurred by SHB.

37. Pugh Accardo and Hays have billed all expenses at their actual costs with no mark-up added and they are not seeking overhead charges. The fees and expenses sought in this application are reasonable and were necessary for the proper administration of the duties of the Receiver.

d. 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.

e. 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.

38. 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. Conducting interviews of investors;
- d. Taking deposition of CryptoFX sales agent;
- e. Conducting interviews of additional sales agents;
- f. Identifying and securing receivership assets;
- g. Maintaining cryptocurrency wallets and/or accounts containing Bitcoin cryptocurrency;
- h. Analyzing public blockchain records to trace assets received by investors in connection with Receivership Defendants and sent out of Receivership Defendants accounts and wallets;
- i. Coordinating valuation and sale of Receivership personal property;
- j. Corresponding with third parties to identify potential receivership assets;
- k. Analyzing emails, text messages, and other records to evaluate Receivership Defendant assets;
- l. Preparing charts showing amount of assets received by CryptoFX;
- m. Preparing of paper and electronic records for a detailed forensic analysis;
- n. Reviewing CryptoFX and CBT business records obtained from investors or in response to third-party subpoenas;

- o. Serving subpoenas to third parties for the collection of documents and information to financial institutions, crypto currency platforms, professionals retained by the Defendants, and other fact witnesses in order to locate additional assets;
- p. Analyzing company records to evaluate potential claims against third parties;
- q. Managing a Relativity database in order to store and review company documents.
- r. Conducting public records searches and related due diligence to affiliated parties, entities, and other potential relief defendants;
- s. Preparing Receiver's Motion to Show Cause of Chavez's violation of Receivership Order as well as Motion to Compel production of receivership records and devices;
- t. Preparing the Receiver's Second Interim Status Report;
- u. Preparing the Receiver's Motion to Approve the Sale of Real Property at 28 Lawrence Marshall Dr.;
- v. Preparing the Receiver's Motion to Approve the Sale of Real Property at 0 Hogan Lane;
- w. Preparing the Receiver's Motion to Approve the Sale of Personal Property;
- x. Preparing discovery requests to CryptoFX sales agents in order to locate additional assets;
- y. Preparing and filing *lis pendens* notices for Receivership real estate assets;
- z. Preparing freeze letters to third parties in order to provide notice of receivership and locate additional assets;
- aa. Reviewing records received from third parties to perform asset tracing analysis;
- bb. Negotiating with Blalock office landlord about the amount due under the lease;
- cc. Working with real estate broker and real estate appraisers to evaluate and liquidate real property;
- dd. Working with Poutous Auto Sales to evaluate and liquidate Receivership Defendants vehicles; and
- ee. Working with Webster's Auction Palace to appraise and evaluate the value

of personal property.

f. The Experience, Reputation, and Ability of the Professional: The Receiver and his team have extensive experience in receivership, bankruptcy, and litigation matters.

g. Undesirability of the Case: This factor is inapplicable to the present case.

h. 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 maintain an ongoing relationship.

i. 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.

39. Each of these tasks detailed in the Receiver's Second 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

40. The Receiver and counsel for the SEC have conferred regarding the Receiver's SCIFA 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.

41. 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 be conditionally awarded fees incurred during the Second Interim Fee Application in the amount of \$46,672.50;

- (b) That the Receiver's Retained Professionals be awarded fees incurred during the Second Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$323,534.50; Pugh Accardo, LLC \$1,079.50; and Hays Financial for \$102,809.40;
- (c) 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 SCIFA in the aggregate amount of \$23,623.19, are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

CONCLUSION

42. Based on the foregoing, the Receiver respectfully requests that the Court enter an order approving the Receiver's Second Certified Interim Fee Application and authorizing the Receiver to immediately pay the fees requested in the SCIFA as follows: (1) to the Receiver in the amount of \$46,672.50; (2) Shook Hardy & Bacon, LLC for \$323,534.50; (3) Pugh Accardo, LLC \$1,079.50; and (4) Hays Financial for \$102,809.40;.

43. 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 \$23,623.19.

Dated: June 16, 2023

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Sonila Themeli

Sonila Themeli
Texas Bar No. 24073588
S.D. Tex. Bar No. 2828237
600 Travis Street, Suite 3400
Houston, TX 77002

Telephone: 713.227.8008
Facsimile: 713.227.9508
sthemeli@shb.com

Caroline M. Gieser
(admitted *pro hac vice*)
SHOOK, HARDY & BACON L.L.P.
1230 Peachtree Street, NE, Suite 1200
Atlanta, GA 30309
Telephone: 470.867.6000
mcgieser@shb.com

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

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that she has conferred with counsel for Plaintiff US Securities and Exchange Commission, and the SEC does not oppose this Application and supports granting the relief requested herein.

/s/ Sonila Themeli

Sonila Themeli

CERTIFICATE OF SERVICE

I hereby certify that on this the 16th day of June, 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.

Matthew J. Gulde
UNITED STATES SECURITIES
AND EXCHANGE COMMISSION
Burnett Plaza, Suite 1900
801 Cherry Street, Unit 18
Fort Worth, TX 76102
Telephone: 817.978.1410
Facsimile: 817.978.4927
guldem@sec.gov

Counsel for Plaintiff
U.S. Securities and Exchange Commission

Paul D. Flack
PRATT & FLACK, LLP
4306 Yoakum Blvd., Suite 500
Houston, TX 77006
Telephone: 713.705.3087
pflack@prattflack.com

Counsel for Defendant Mauricio Chavez

Dan L. Cogdell
COGDELL LAW FIRM, PLLC
1000 Main Street, Suite 2300
Houston, TX 77002
Telephone: 713.437.1869
Facsimile: 713.437.1810
dan@cogdell-law.com

Counsel for Defendant Giorgio Benvenuto

/s/ Sonila Themeli
Sonila Themeli

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:
Invoice Date:
Matter Number:
Billing Attorney:

3008158
04/27/2023
33206.393697
John Lewis Jr.

Summary of Invoice

For Professional services and disbursements thru **March 31, 2023**

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

Current Fees	\$46,672.50
Total Current Fees and Disbursements	\$46,672.50
Previous Balance	21,419.53
Total Amount Due	\$68,092.03

REMITTANCE INFORMATION

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

Wiring Instructions

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

Remit Address

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

Federal Tax ID:

44-0585497

Payments received after March 31, 2023 may not be reflected herein.



33206.393697 3008158 04/27/2023

Invoice Detail

For Professional services and disbursements thru *March 31, 2023*

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC01 Asset Analysis				
01/19/23	JLJ	Review and approve website modifications related to sale of receivership assets; emails exchanges regarding same. (.8); Evaluate offer of Waller real estate and give direction to broker (.5); Consideration of turnover demand on non-party related to Chavez - multiple emails and discussion (1.2)	2.50	\$1,312.50
02/01/23	JLJ	Assessment of preliminary claim materials for action against money order issuers (1.0); attention to banking matters on Chicago operations. (.4); attention to turns of Chavez budget requests and supporting data (.4)	1.80	945.00
Subtotal for SEC01 Asset Analysis			4.30	\$2,257.50
SEC02 Asset Disposition				
02/02/23	JLJ	Review turns of emails regarding recovery of receivership assets in Chavez possession (.6); Review of suit papers in Moneygram enforcement action (.8); Review of exchanges regarding Bianance and Squareup (1.5); Review of laws and procedures regarding appraisal and marketing of Marshall property (.8)	3.80	\$1,995.00
02/03/23	JLJ	Revisions to special conditions section contract for sale of Waller County property (.6) Turns of draft response to Flack letter for transmittal to court. (.8); Review new information regarding ongoing fraud and exchanges regarding recovery of ongoing call records. (1.1)	2.50	1,312.50
02/06/23	JLJ	Investigation of potential interest in Lake Conroe property and related post receivership appointment transfers.	0.80	420.00
02/07/23	JLJ	Calls and review of documents relating to Waller County deed office and records update regarding Tidmore property. Review public records regarding ownership of same by CBT.	2.50	1,312.50



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Date	Attorney	Description	Hours	Amount
02/14/23	JLJ	Review of real estate listing and offer documents for Hogan Lane property.	0.80	420.00
02/16/23	JLJ	Attention to closing and title company requirements incident to the closing of Hogan property. Briefing regarding paths to liquidation of Binance crypto account.	1.20	630.00
03/07/23	JLJ	Attention to review of closing documents related to Lawrence Marshall property. Attention to bank statement and financial review.	3.20	1,680.00
03/28/23	JLJ	Review of revised closing documents for sale of Hogan property.	0.70	367.50
Subtotal for SEC02 Asset Disposition			15.50	\$8,137.50

SEC04 Case Admin

01/11/23	JLJ	Attention to review of SFAR report element of interim report to court. Additional inquiry to team regarding same (.8); Exchanges regarding employee interviews (.5); Review and notes regarding Flack recently propounded RFP and exchanges with team regarding response and range of approaches to share receivership documents (.5) Approve website changes and review media accounts (.6) Review and reconciliation of bank accounts and open reimbursable estate (.9)	3.30	\$1,732.50
01/19/23	JLJ	Review and approve liquidation plan (.4); attention to response and cost elements related to Salesforce subpoena. (.4).	0.80	420.00
01/23/23	JLJ	Analysis of issues regarding Flack discovery and Chavez allowance request. Skim liquidation report and draft for filing. Consideration of purchasing Salesforce licenses.	1.20	630.00
02/06/23	JLJ	Confer and approve updates to hotline and website.	0.70	367.50
02/13/23	JLJ	Strategic team discussions providing guidance on real estate sale issues, outreach to CFX employees regarding commissions paid, locating and examination of "leaders" and "brokers", MSB outreach, expansion of receivership and third party lawsuits.	2.20	1,155.00
02/13/23	JLJ	Best practices call with M. Gulde, A. Bambach and Neal Jacobson of SEC . Debrief and action items call following with KP and ST.	2.20	1,155.00
02/20/23	JLJ	Detailed review of Hay's draft Ponzi report and exhibits. Comments to same.	2.80	1,470.00



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Date	Attorney	Description	Hours	Amount
02/22/23	JLJ	Attention to Gomez cooperation deliberations. Followup on IL subpoena related issues. Attention to seller info request (Hogan property). Investigate Land Management invoice including calls with taxing authorities regarding receivership.	2.80	1,470.00
03/20/23	JLJ	Strategize with team on open matters in preparation for hearing. Attention closing documents regarding Hogan property sale.	1.60	840.00
03/23/23	JLJ	Prepare for an attend Show cause hearing.	3.50	1,837.50
Subtotal for SEC04 Case Admin			21.10	\$11,077.50

SEC05 Claims Admin

01/30/23	JLJ	Attention to Webster's Auction inventory report and invoice, related banking (.4); Attention to Benvenuto living allowance request, related banking (.4); Team call to discuss interim report, employee subpoenas, outreach to sales agents (.1.4), Strategize response to Flack letter to court on fees, review fee guidance in other receivership cases (.5); Considerations as to expansion of receivership by motion (.3); Review and edit draft interim report (.8); Skim Blocktrace work product (1.1)	4.90	\$2,572.50
03/01/23	JLJ	Review and analysis of Chavez revised proposed living budget as required by receivership order (.8); Review and approve private sale motion and proposed order (.4) Skim case law regarding use of receivership funds for defendant's legal fees in preparation for hearing (.9)	2.20	1,155.00
Subtotal for SEC05 Claims Admin			7.10	\$3,727.50

SEC11 Status Reports

01/31/23	JLJ	Turns of quarterly interim report.	3.20	\$1,680.00
03/27/23	JLJ	Strategize regarding guidance from judge and review pending real estate closing with team. Review of open issues in Ponzi report.	1.50	787.50
Subtotal for SEC11 Status Reports			4.70	\$2,467.50

SEC12 Litigation Consulting

02/09/23	JLJ	Detailed consideration of MSB regulations regard Bank Secrecy Act in light of large volume of money orders utilized by CFX. Strategize regarding same.	1.50	\$787.50
02/20/23	JLJ	Strategize team regarding responses to IL, Flack and other inbound discovery requests propounded and confidentiality considerations associated.	1.30	682.50



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Date	Attorney	Description	Hours	Amount
02/27/23	JLJ	Analysis of strategic issues related to additional third party subpoenas to Zelle and other mobile cash applications. Discuss responses to Flack RPD's. Strategize regarding status call with Judge regarding Flack fees and conferrals on other open issues with Chavez living allowance.	1.80	945.00
Subtotal for SEC12		Litigation Consulting	4.60	\$2,415.00

SEC13 Litigation

02/06/23	JLJ	Attention to motions to approve sales of property. Consideration of means and method of sale of Chavez personal property following inventory and appraisal. Consideration of objections by former CFX employee to subpoena. Review, comment and consider next steps to Flack Surreply.	1.80	\$945.00
03/02/23	JLJ	Prepare for and participate in Status conference with Judge.	1.50	787.50
03/06/23	JLJ	Strategize with team regarding open issues from status call with court, including privilege assertion issues, trial setting, ponzi expert report preparation	1.80	945.00
03/21/23	JLJ	Reading articles and other case pleadings to inform strategic options on "net winner" clawback litigation and D&O claims.	4.50	2,362.50
03/22/23	JLJ	Prepare for hearing on fees, show cause and related matters.	3.50	1,837.50
03/30/23	JLJ	Call with CMG and B. Abernathy (BSA expert) regarding strategic considerations for pursuing potential claims of enabling fraud.	1.20	630.00
Subtotal for SEC13		Litigation	14.30	\$7,507.50

SEC16 Valuation

01/05/23	JLJ	Review and approve crypto expert retention proposal, inquiries regarding same. (.6); Review information on "leaders" database (.4); correspondence counsel for Aspire Oak apartments regarding Chavez payment history and access(.4).	1.60	\$840.00
01/06/23	JLJ	Detailed review of CBT/Torres document production to evaluate strategic next steps.	1.50	787.50
01/09/23	JLJ	Attend SEC deposition (Lemus). Confer with M. Gulde (SEC) and ST afterwards.	5.80	3,045.00
01/10/23	JLJ	Inspection of Chavez residence with auctioneer/appraiser and ST.	2.50	1,312.50



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Date	Attorney	Description	Hours	Amount
01/17/23	JLJ	Review ongoing work streams with team including expansion of receivership, sales agents, Chavez inbound discovery requests and Salesforce subpoena.	1.40	735.00
03/15/23	JLJ	Visual inspection of undeveloped parcel in Waller County. Review and offer edits to closing documents. Attention to further extension on employee tax documents based upon lack of required company records.	4.50	2,362.50
Subtotal for SEC16 Valuation			17.30	\$9,082.50
Total			88.90	\$46,672.50

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	88.90	\$525.00	\$46,672.50
Total Fees		88.90		\$46,672.50

Total Current Fees and Disbursements	\$46,672.50
Previous Balance	21,419.53
Total Amount Due	\$68,092.03

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:
Invoice Date:
Matter Number:
Billing Attorney:

3008735
04/30/2023
33206.389768
John Lewis Jr.

Summary of Invoice

For Professional services and disbursements thru **March 31, 2023**

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

Current Fees	\$323,534.50
Current Disbursements	23,294.14
Total Current Fees and Disbursements	\$346,828.64
Previous Balance	63,847.86
Total Amount Due	\$410,676.50

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

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33206.389768 3008735 04/30/2023

Invoice Detail

For Professional services and disbursements thru *March 31, 2023*

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC01 Asset Analysis				
01/03/23	KKP	Manage data files retrieved from technology support team regarding CFX employee MS.	0.40	\$170.00
01/04/23	KKP	Communicate with CFX witness O.C.	0.30	127.50
01/05/23	KKP	Revise American Express subpoena and freeze letter.	0.40	170.00
01/05/23	KKP	Communicate on call with CFX witness O.C.	0.70	297.50
01/05/23	KKP	Analyze materials sent by O.C. in order to prepare for upcoming meeting with O.C.	1.50	637.50
01/05/23	STV	Confer with receiver and Hays group re crypto expert	0.20	85.00
01/05/23	STV	Review response to subpoena from Mercedes Benz Greenway	0.20	85.00
01/05/23	STV	Prepare engagement letter for BlockTrace and confer with the team re same	1.00	425.00
01/06/23	STV	Revise engagement letter to BlockTrace and confer with the team re same	0.40	170.00
01/09/23	KKP	Communicate on call with O.T. regarding managing gmail account.	0.20	85.00
01/12/23	STV	Review Coinbase responses to subpoena on J. T.	0.40	170.00
01/17/23	KKP	Confer with C. Geiser regarding upcoming receivership tasks and deadlines.	0.40	170.00
01/17/23	CMG	Attend team call to discuss current efforts to collect and safeguard additional assets.	1.20	510.00
01/18/23	KKP	Revise Mercedes Benz of Sugarland subpoena.	0.20	85.00
01/19/23	STV	Confer with the real estate agent and team re offer on Lawrence lot and listing of the 25 acre lot	0.60	255.00
01/23/23	KKP	Revise subpoena for Star Motor Cars and West Houston Volkswagen.	0.50	212.50
01/23/23	STV	Call with BlockTrace re coinbase account	0.60	255.00
01/24/23	KKP	Provide notice of subpoenas to opposing counsel.	0.10	42.50
01/24/23	KKP	Revise subpoena for Styers Realty.	0.20	85.00
01/24/23	KKP	Prepare for and attend interview with CFX leader EE	2.00	850.00
01/24/23	KKP	Confer with team regarding deposition notice of CFX employee O.M.	0.20	85.00



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Date	Attorney	Description	Hours	Amount
01/24/23	STV	Review cryptocurrency transactions and confer with the team Coinbase Receiver's wallet	0.40	170.00
01/26/23	KKP	Prepare for and conduct employee interview of S.A.	1.30	552.50
01/26/23	KKP	Prepare and conduct employee interview of SZ	0.80	340.00
01/26/23	STV	Confer with appraiser re meeting to discuss report	0.20	85.00
01/27/23	KKP	Conduct and prepare for employee interview of N.A	0.80	340.00
01/27/23	KKP	Confer with appraiser regarding appraisal observations.	0.10	42.50
01/30/23	KKP	Correspond with counsel for Chavez and Gonzalez regarding inspection of property at 24923 Tidmor Lane.	0.10	42.50
01/30/23	KKP	Draft subpoenas to Cadence Bank, Susser Bank and Amrock title company in order to locate additional receivership assets.	2.00	850.00
01/30/23	KKP	Conduct asset analysis including personal property and real property searches for Receivership Defendants, affiliated persons and entities.	4.00	1,700.00
01/30/23	STV	Review affidavit by Hays re cash raised from Nov. 2021 to Sept. 2022.	0.30	127.50
01/30/23	STV	Review BlockTrace report on crypto trading	0.50	212.50
01/31/23	KKP	Perform analysis of appraisal report for 25 acre land in Waller County in preparation for meeting with appraiser to discuss value of property.	0.50	212.50
01/31/23	KKP	Confer with property appraiser regarding upcoming interview and discussion regarding 25 acre property owned by CBT.	0.30	127.50
01/31/23	KKP	Confer with counsel for J. Gonzalez regarding inspection of property owned by JM Monarchy.	0.20	85.00
02/01/23	KKP	Perform analysis of appraisal report prior to call with appraiser relating to 25 acre lot.	0.50	212.50
02/01/23	STV	Review CFX spreadsheet maintained by R. Zavala recording new CFX contract , payments to investors, commissions and bonuses, as well funds sent to Houston	0.80	340.00
02/03/23	ALTZ	Research Salesforce access and Salesforce data capture options.	1.20	510.00
02/03/23	ALTZ	Video conference with Mr. Thomas and Ms. Gilmer Herr from Salesforce, regarding access and Salesforce data capture options.	1.50	637.50
02/03/23	ALTZ	Begin capturing data and documents from Salesforce.	5.80	2,465.00
02/04/23	ALTZ	Continue capturing data and documents from Salesforce.	5.30	2,252.50
02/06/23	STV	Review case documents re real property purchased by I.S.	0.30	127.50
02/06/23	KKP	Perform update of case law relating to requirements for sale of real and personal property.	2.50	1,062.50



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Date	Attorney	Description	Hours	Amount
02/06/23	KKP	Confer with B. Webster regarding personal property valuation.	0.10	42.50
02/06/23	KKP	Draft subpoena relating to Crypto wallets.	0.60	255.00
02/06/23	ALTZ	Analyze and summarize data from SalesForce.	3.00	1,275.00
02/06/23	ALTZ	Communicate with Ms. Themeli regarding SalesForce access.	0.10	42.50
02/06/23	ALTZ	Continue capturing data and documents from SalesForce.	3.30	1,402.50
02/07/23	STV	Review summary of inspection of Tidmore lane	0.20	85.00
02/07/23	KKP	Review and analyze accurint report relating to CFX leaders.	2.10	892.50
02/07/23	KKP	Perform analysis of real property records in order to locate properties owned by O.T.	1.50	637.50
02/07/23	KKP	Conduct inspection of Chavez's real property.	2.50	1,062.50
02/07/23	KKP	Draft lis pendens regarding to property owned by CFX leader in Montgomery County.	1.00	425.00
02/07/23	KKP	Confer with D. Styers from Styers realty regarding 25 acre lot.	0.20	85.00
02/07/23	ALTZ	Prepare SalesForce data for the experts and vendor.	2.80	1,190.00
02/08/23	KKP	Perform analysis of personal property located at Chavez's residence.	1.50	637.50
02/08/23	ALTZ	Analyze existing reports from SalesForce.	2.60	1,105.00
02/09/23	STV	Review email from GC re commissions and bonuses	0.20	85.00
02/10/23	KKP	Communicate with appraisals regarding real property owned by CFX.	0.50	212.50
02/10/23	KKP	Review and perform analysis of accurint reports for CFX investors and leaders.	4.50	1,912.50
02/10/23	KKP	Confer with Providence Title regarding subpoena.	0.10	42.50
02/10/23	KKP	Revise subpoena for Amroc Inc relating to receivership defendants real property.	0.80	340.00
02/13/23	KKP	Confer with appraisers relating to real property land owned by receivership defendants.	0.30	127.50
02/13/23	KKP	Confer with M. Poutus regarding car evaluations for sale of receivership defendant vehicles.	0.30	127.50
02/13/23	KKP	Confer regarding Providence title subpoena.	0.10	42.50
02/15/23	KKP	Confer with appraisals regarding property analysis of 25 acre lot.	0.40	170.00
02/15/23	KKP	Review and analyze personal property located at Chavez's apartment and summarize documents to include in turnover request.	1.00	425.00
02/15/23	KKP	Confer with S. Themeli regarding obtaining title reports for properties.	0.10	42.50
02/15/23	KKP	Draft subpoena to Amrock Inc in order to receive records relating to receivership defendants.	0.60	255.00
02/17/23	KKP	Review property records relating to CFX leader IS	0.50	212.50



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Date	Attorney	Description	Hours	Amount
02/17/23	KKP	Review update of case law regarding notice requirements for lis pendens.	1.00	425.00
02/17/23	ALTZ	Communicate with Mr. Askue regarding Salesforce reports.	0.10	42.50
02/17/23	ALTZ	Analyze available Salesforce reports for Mr. Askue.	1.80	765.00
02/20/23	CMG	Attend weekly team call to discuss outstanding action items.	0.50	212.50
02/21/23	KKP	Draft subpoena for Independent Financial in order to locate receivership assets.	0.80	340.00
02/21/23	KKP	Draft subpoena for Metabank in order to locate receivership assets.	0.80	340.00
02/21/23	KKP	Draft subpoena for QTC Holding Corp in order to locate receivership assets.	0.80	340.00
02/21/23	KKP	Confer internally regarding subpoena issued for Styers Reality.	0.20	85.00
02/22/23	KKP	Review property records relating to CFX leaders in order to identify real property in order to file les pendens.	6.30	2,677.50
02/22/23	STV	Confer with the Hays team and crypto expert re ledger nano wallet/cold storage device	0.20	85.00
02/23/23	KKP	Draft subpoena for Zelle in order to request documents relating to receivership defendants.	1.20	510.00
02/23/23	KKP	Manages responsive documents in response to SEC Illinois subpoena.	1.60	680.00
02/23/23	STV	Call with Scott Hayes re analysis of bank and other records	0.30	127.50
02/24/23	KKP	Attend interview with CFX former employee, GG.	1.30	552.50
02/24/23	KKP	Draft spreadsheet based on Review of property records relating to CFX leaders in order to identify real property in order to file les pendens.	3.20	1,360.00
02/27/23	KKP	Confer with internal team regarding American Express subpoena.	0.20	85.00
03/01/23	KKP	Confer with Wild life management -25 acre	0.40	170.00
03/02/23	KKP	Draft notices of lis pendens and transmittal letter.	1.50	637.50
03/03/23	KKP	Draft letter to P. Flack regarding personal property owned by Chavez and turnover request.	2.50	1,062.50
03/06/23	CMG	Attend team strategy meeting to determine outstanding tasks for the week.	1.10	467.50
03/06/23	STV	Confer with the team re additional appraisal for Waller county property and filing of lis pendens	0.40	170.00
03/07/23	KKP	Confer with appraisal company regarding appraisal of 25 acre lot.	0.10	42.50
03/07/23	ALTZ	Communicate with Mr. Percy regarding the Salesforce data.	0.10	42.50



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Date	Attorney	Description	Hours	Amount
03/08/23	KKP	Communicate with property management company/owner of hair salon (Hair News Salon) that Chavez leased in order to serve subpoena.	0.50	212.50
03/08/23	KKP	Confer regarding proposed appraisal report for 25 acre lot in waller county.	0.30	127.50
03/08/23	KKP	Confer with P. Flack regarding documents relating to Hair news salon.	0.10	42.50
03/10/23	KKP	Confer with waller county appraisal district regarding 25 acre property in waller county and wildlife designation.	0.50	212.50
03/12/23	CMG	Analysis of possible claims against money order issuers.	2.00	850.00
03/15/23	KKP	Review real property records via lexis nexis and accurint reports in order to locate real property owned by Illinois leaders,	3.50	1,487.50
03/16/23	KKP	Review and perform analysis of Lexis nexis property records and liberty county appraisal district records in order to locate real property owned by Illinois leaders.	5.00	2,125.00
03/16/23	KKP	Confer regarding wiring funds to appraisal company for inspection relating to 25 acre property in Waller County.	0.20	85.00
03/17/23	KKP	Review real property documents regarding Chavez residence and Amrock title company.	0.30	127.50
03/20/23	KKP	Confer With company regarding appraisal order for 25 acre lot.	0.10	42.50
03/23/23	STV	review correspondence from Plateau Wildlife Management re Waller county property valuation	0.20	85.00
03/23/23	STV	confer with K. Powell re lis pendens in Liberty county, TX	0.10	42.50
03/28/23	STV	Confer with Hays group re Pathward bank records; confer with Coinbase re 1099 forms for defendant's accounts	0.60	255.00
03/28/23	STV	Confer with the team re lis pendens in Liberty county, confer with team and Blocktrace re liquidation of Binance account	0.50	212.50
03/29/23	STV	Review inventory of Chavez's residence prepared by Webster's, confer with Webster's and team re same, revise letter to counsel for Chavez and email correspondence with him re production of additional documents and request for turnover of personal property	1.10	467.50
03/29/23	STV	Research and supplement motion to invest receivership funds and confer with the Receiver re same	1.30	552.50
03/30/23	STV	Emails and call with appraiser and real estate broker re Waller county property valuation	0.50	212.50



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Date	Attorney	Description	Hours	Amount
03/30/23	STV	Confer with the receiver re filing of receivership order in additional jurisdictions; coordinate filings; confer with the team re receivership asset assessment; research receivership assets	2.90	1,232.50
Subtotal for SEC01 Asset Analysis			118.10	\$50,192.50

SEC02 Asset Disposition

01/06/23	STV	Email with appraiser re inspection of Chavez's residence	0.20	\$85.00
01/09/23	STV	Prepare declaration of no conflict by Webster Auctions and confer with him re same	0.30	127.50
01/12/23	STV	Revise bill of sale to J. Higareda re sale of receivership assets	0.40	170.00
01/13/23	STV	Confer with the team and expert re opening of Receiver's crypto wallet	0.20	85.00
01/16/23	STV	Research and draft Receiver's liquidation plan and confer with the team re same	2.80	1,190.00
01/19/23	STV	Call and email with R. Franco Legislative Affairs 25th Ward Alderman's office Chicago re CFX victims	0.60	255.00
01/20/23	STV	Confer with the appraisal team re appointment with appraiser re 25 acre property	0.20	85.00
01/20/23	STV	Review summary of the offer for 28 Lawrence lot	0.30	127.50
01/24/23	STV	Call with BlockTrace re Exodus wallet and transfer for Coinbase wallet	0.60	255.00
01/26/23	STV	Confer with K. Morris, real estate agent re contract and addenda to the same	0.40	170.00
01/27/23	STV	Confer with the real estate agent and Receiver re offer on Hogan lane property	0.40	170.00
01/27/23	STV	Review contract for sale of real property and requirements for motion to sell real estate	1.40	595.00
01/30/23	KKP	Confer with S. Themeli regarding motion to approve sale of real estate and personal property.	0.50	212.50
01/31/23	KKP	Perform analysis of updated case law regarding receiver's motion for approval of sale of real property.	2.00	850.00
02/01/23	STV	Review Ebenezer construction invoices, payment information for purchase of Mack property and claimed work on Hogan lane properties, call with real estate agent and appraiser, review TREC for 28 Lawrence and revise the same	3.20	1,360.00
02/01/23	KKP	Perform analysis of proposed land contract relating to real properties.	2.00	850.00
02/01/23	KKP	Draft Receivers motion to approve the sale of real property.	3.70	1,572.50



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Date	Attorney	Description	Hours	Amount
02/01/23	KKP	Confer with K. Morris, S. Themeli, R. Dagley regarding appraisal reports for receivership defendant real properties.	0.80	340.00
02/02/23	STV	Emails with counsel for Vargas and Mr. Flack and Michael Poutous re cars	0.50	212.50
02/02/23	STV	Confer with realtor re counter offer on Hogan lane	0.20	85.00
02/02/23	STV	Revise Contract for sale of 28 Lawrence, addendum and Exhibit to the same, call wth K. Powell re revisions	0.80	340.00
02/02/23	KKP	Draft motion to approve sale of real property.	3.50	1,487.50
02/02/23	KKP	Confer with S. Themeli regarding land contract.	0.50	212.50
02/02/23	KKP	Review and revise land contract relating to real property.	2.50	1,062.50
02/03/23	KKP	Revise land contract relating to receivership real property.	0.50	212.50
02/03/23	KKP	Draft motion to approve sale of real property.	3.50	1,487.50
02/03/23	STV	Confer with Poutous Auto sales re offers on and listing of BMW	0.20	85.00
02/06/23	STV	Confer with Webster re inventory of personal property	0.30	127.50
02/06/23	STV	Consider listing of the BMW and offer on Mercedes, confer with Mike Poutous re same; confer with K. Powell re motion for sale of personal property	0.70	297.50
02/07/23	KKP	Confer with Montgomery county clerk regarding lis pendens.	0.30	127.50
02/08/23	KKP	Communcate with reltor re 28 lawrence marshall contract	0.10	42.50
02/09/23	KKP	Draft receivers motion to sale personal property.	2.00	850.00
02/09/23	KKP	Draft receivers motion to sale real property,	2.50	1,062.50
02/13/23	STV	Email with real estate broker re sale of real estate	0.20	85.00
02/13/23	STV	Email with M. Poutous re listing and sale of cars	0.30	127.50
02/14/23	KKP	Review and analyze property records and purchase history relating to 0 Hogan Lane and 28 lawrence marshall.	1.50	637.50
02/14/23	KKP	Perform update of case law regarding real property publication requirements.	0.50	212.50
02/14/23	KKP	Confer with Realtor regarding sale of 0 Hogan Lane.	0.40	170.00
02/14/23	KKP	Review real estate contract and exhibits relating to receivership real property.	0.50	212.50
02/15/23	KKP	Draft and publish newspaper ad in support of motion to sale real property.	0.50	212.50
02/15/23	KKP	Draft motion to sale real property.	2.40	1,020.00
02/15/23	STV	Revise motion to sell real estate Hogan lane	0.80	340.00
02/15/23	STV	Review emails with title company re sale of Hogan lane lot	0.20	85.00



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Date	Attorney	Description	Hours	Amount
02/16/23	KKP	Review executed contract, supporting exhibits and Intermediary relationship agreement regarding sale of real property (0 Hogan Lane).	1.00	425.00
02/16/23	KKP	Revise receiver's motion for the sale of real property (0 Hogan Lane).	1.90	807.50
02/16/23	KKP	Confer with M. Potus, car dealer, regarding receivership defendant's volkswagen vehicle.	0.10	42.50
02/16/23	STV	Confer with defense counsel re motion to sell real estate, revise motion and coordinate filing	0.60	255.00
02/20/23	KKP	Revise motion and proposed order relating to the sale of personal property-Mercedes.	1.50	637.50
02/20/23	STV	Confer with Michael Poutous and team re sale of Mercedes, revise motion to sell personal property	0.40	170.00
02/21/23	KKP	Draft Seller's Inquiry document to be sent to Fidelity Title relating to 0 Hogan lane transaction.	0.30	127.50
02/22/23	STV	Confer with real estate broker and team re offer on 28 Lawrence lot	0.20	85.00
02/22/23	KKP	Confer with realtor regarding proposed offer on 28 Lawrence Marshall property.	0.10	42.50
02/22/23	KKP	Confer with Fidelity Title regarding items needed from Receiver to close on real property.	0.20	85.00
02/23/23	KKP	Revise Seller's Inquiry document to be sent to Fidelity Title relating to 0 Hogan lane transaction.	0.30	127.50
02/24/23	STV	Revise motion to liquidate automobile, coordinate update on the Receiver's website	0.90	382.50
02/27/23	KKP	Confer with Realtor regarding property closing, proposed offers and required property maintenance.	0.40	170.00
02/27/23	KKP	Revise motion to approve sale and proposed order relating to personal property Mercedes and Volkswagen.	1.50	637.50
02/27/23	KKP	Confer with Fidelity National Title regarding sale of 0 Hogan Lane.	0.40	170.00
02/27/23	KKP	Confer with car dealer, M. Poutus regarding sale of vehicles.	0.20	85.00
02/27/23	STV	Confer with M. Poutous and K. Powell re sale of the VW and motion to sell the same and other vehicles; confer with real estate broker and team re sale of Hogan Lane property	0.50	212.50
02/28/23	STV	Revise motion to approve private sale of automobile and proposed order and coordinate filing	0.60	255.00
02/28/23	KKP	Revise motion to approve sale of personal property.	0.30	127.50
02/28/23	KKP	Confer regarding closing on real property at 0 hogan lane.	0.30	127.50
02/28/23	KKP	Confer regarding contract on real property at 28 Lawrence marshall.	0.50	212.50
03/02/23	KKP	Revise motion to approve sale of real property and proposed order (28 Lawrence marshall).	1.00	425.00



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Date	Attorney	Description	Hours	Amount
03/02/23	KKP	Confer with P. Flack regarding title to Volkswagen.	0.10	42.50
03/02/23	STV	Emails with counsel for Chavez and Vargas and the team re sale of cars and wire transfer; coordinate preparation of additional third party subpoenas; confer with the team re Salesforce data	0.50	212.50
03/03/23	KKP	Confer regarding closing documents needed for 0 Hogan lane.	0.50	212.50
03/06/23	KKP	Draft notices of lis pendens.	3.00	1,275.00
03/07/23	KKP	Conduct research relating to requirements of publishers affidavit.	0.30	127.50
03/07/23	KKP	Draft publishers affidavit.	0.60	255.00
03/07/23	KKP	Revise motion to approve sale of real property.	0.50	212.50
03/08/23	KKP	Draft publisher's affidavit in support of motion to approve sale of real property.	1.50	637.50
03/08/23	KKP	Confer with V. Lara from greensheet regarding publishers affidavit.	0.20	85.00
03/08/23	STV	Revise motion to sell real property in Waller county and confer with the team re same	0.40	170.00
03/09/23	KKP	Confer regarding Greensheet newspaper ad as requested by title company.	0.30	127.50
03/10/23	KKP	Confer regarding newspaper ad regarding property at 28 Lawrence Marshall.	0.40	170.00
03/10/23	KKP	Confer with Plateau Land & Wildlife Management regarding wildlife designation for 25 acre waller county lot.	0.20	85.00
03/13/23	KKP	Revise motion to approve the sale of real property relating to 28 Lawrence Marshall.	1.10	467.50
03/13/23	KKP	Confer with M. Poutus regarding release of lien and necessary information from Capital One Auto.	0.30	127.50
03/13/23	KKP	Confer with staff at Greensheet regarding requested publisher's affidavit (0 Hogan Lane).	0.60	255.00
03/14/23	KKP	Provide required documents to title company relating to 0 Hogan Lane.	0.20	85.00
03/14/23	KKP	Draft notice of publishers affidavit in support of motion to sale real property located at 0 hogan lane.	0.50	212.50
03/15/23	KKP	Confer with Capital One representative regarding lien on volkswagen vehicle in order to facilitate sale of vehicle.	2.00	850.00
03/16/23	KKP	Confer with Capital One regarding release of lien.	2.00	850.00
03/16/23	KKP	Draft letter to Capital One regarding release of lien.	0.80	340.00
03/21/23	KKP	Draft subpoena to Amrock title company regarding Chavez property.	0.50	212.50
03/21/23	KKP	Draft letter to Capital One regarding release of title for Volkswagen vehicle.	2.50	1,062.50
03/21/23	KKP	Confer with car dealer, M. Poutus regarding title release for Volkswagen vehicle.	0.20	85.00



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Date	Attorney	Description	Hours	Amount
03/21/23	KKP	Confer with title company regarding closing documents for 28 Lawrence marshall.	0.10	42.50
03/23/23	KKP	Confer with Car dealer, M. Poutus regarding title and sale of Volkswagen.	0.40	170.00
03/23/23	KKP	Draft notices of lis pendens and transmittal letter regarding Liberty County properties.	4.50	1,912.50
03/23/23	STV	review release of title by CapitalOne	0.20	85.00
03/24/23	KKP	Confer With Realtor regarding closing documents needed for 28 Lawrence Marshall.	0.10	42.50
03/27/23	KKP	Confer regarding documents needed for 28 Lawrence marshall closing.	0.10	42.50
03/27/23	KKP	Confer Regarding required documents for Hogan lane closing.	0.30	127.50
03/28/23	KKP	Communicate internal SHB team regarding 0 Hogan Lane closing.	0.30	127.50
03/28/23	KKP	Communicate with M. Poutus regarding sale of BMW and title for the Volkswagen vehicle.	0.50	212.50
03/28/23	KKP	Draft motion to approve the sale of BMW vehicle and proposed order.	1.00	425.00
03/28/23	STV	Confer with the team re sale of cars	0.20	85.00
03/29/23	KKP	Communicate with title company regarding 0 Hogan Lane closing.	0.20	85.00
03/29/23	KKP	Communicate regarding facilitating the sale of Chavez's BMW and Volkswagen.	0.30	127.50
03/29/23	STV	Review final closing documents for the sale of Hogan In and confer with title company re same	0.60	255.00
Subtotal for SEC02 Asset Disposition			86.60	\$36,805.00
SEC03 Business Operations				
02/08/23	CAU	Correspond with supervisor regarding witness calls today; review documents sent over by EE; submit analysis of documents to supervisor.	0.60	\$255.00
02/10/23	CAU	Prepare for and attend call with Chicago leader IS; call with J. M.	2.80	1,190.00
Subtotal for SEC03 Business Operations			3.40	\$1,445.00
SEC04 Case Admin				
01/03/23	KKP	Communicate on weekly receivership call with J.Lewis, S. Askue, S.Themeli, G. Hays.	1.50	\$637.50
01/03/23	STV	Review correspondence from Google re subpoena and coordinate preparation of additional third party subpoenas	0.40	170.00
01/03/23	STV	Coordinate filing of motion to employ BlockTrace	0.20	85.00



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Date	Attorney	Description	Hours	Amount
01/03/23	STV	Call with SEC counsel re witnesses' cell phone imaging	0.20	85.00
01/03/23	STV	Review appraisal on Waller county property	1.10	467.50
01/03/23	STV	Prepare for and conduct weekly strategy call with the team	1.70	722.50
01/03/23	STV	Confer with Gulfstream and e-discovery team re imaging of CFX leaders' phones	0.70	297.50
01/03/23	STV	Review documents produced by Alex Weatherford	0.90	382.50
01/03/23	STV	Review response to subpoena from Santander bank and confer with the team re follow up to same	0.20	85.00
01/04/23	STV	Emails with counsel for Google and Coinbase, and team re subpoena responses and notice	0.30	127.50
01/04/23	STV	Call with Receiver and counsel for Chavez re request for inspection of residence, receivership assets and other case issues; and confer with the Receiver and team re same	1.20	510.00
01/04/23	STV	Confer with the team re J. Gonzalez's subpoena responses	0.20	85.00
01/04/23	STV	Review documents produced in response to subpoena by Perry Homes	0.80	340.00
01/04/23	STV	Confer with the team re document sharing, litigation strategy and asset recovery from leaders, and call with counsel for SEC.	0.40	170.00
01/05/23	KKP	Communicate on call with S. Themeli regarding case strategy for receivership.	0.90	382.50
01/05/23	STV	Call and email with Sheriff office Ascension Louisiana re investors' claims, review contracts sent by him	0.80	340.00
01/05/23	STV	Call with counsel for OT and MS re imaging of phones	0.30	127.50
01/05/23	STV	Prepare for and conduct call with investor O. C.	1.10	467.50
01/05/23	STV	Review correspondence by immigration group re meetings with investors	0.20	85.00
01/05/23	STV	Draft correspondence to Post Oak Advantage	1.40	595.00
01/05/23	STV	Confer with the receiver and the team re Aspire Post Oak	0.70	297.50
01/05/23	STV	Call with counsel for Aspire Post oak re discovery responses and the receivership order	0.70	297.50
01/06/23	STV	Confer with counsel for Vantage Post Oak re inspection of premises	0.20	85.00
01/06/23	STV	Email with marshal service re support during the inspection of Chavez's residence	0.20	85.00
01/06/23	STV	Call with Dallas Police, financial crimes division	0.20	85.00
01/06/23	STV	Confer with Chavez's counsel and team re request for inspection of residence, revise request for inspection	0.90	382.50



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Date	Attorney	Description	Hours	Amount
01/06/23	STV	Revise and supplement letter to sales persons requesting accounting of commissions received from CFX	1.10	467.50
01/06/23	STV	Review list of investor calls and email A. Rendon counsel for investors	0.30	127.50
01/09/23	STV	Review Santander consumer response to subpoena	0.20	85.00
01/09/23	STV	Confer with the team and vendor re witness cell phone data	0.40	170.00
01/09/23	STV	Email with D. Cogdell re wire of retainer	0.10	42.50
01/09/23	KKP	Confer with technology support team in order to reset and download CFX gmail passwords and download data.	0.20	85.00
01/09/23	STV	Meeting with the Receiver and the SEC counsel	1.10	467.50
01/09/23	STV	Review email by Chavez's counsel re inspection of the residence and confer with the Receiver re same	0.30	127.50
01/09/23	STV	Email with counsel for Post Oak Hotel re responses to subpoena	0.10	42.50
01/09/23	STV	Coordinate review of J.G.'s produced records with the Hays team	0.30	127.50
01/10/23	STV	Conduct inspection of defendant Chavez's residence at Aspire Post Oak	2.00	850.00
01/10/23	STV	Confer with the team re inspection of the premises at Mr. Chavez's residence and deposition of Tony Lemus	0.70	297.50
01/10/23	STV	Email plaintiff's counsel re inspection of Chavez's residence and personal property	0.20	85.00
01/10/23	STV	Review emails from Chicago investor O. C.	0.20	85.00
01/10/23	STV	Coordinate document processing and other administrative tasks for the team	0.60	255.00
01/11/23	STV	Emails and call with the team re third party interviews	0.60	255.00
01/11/23	STV	Confer with Receiver re interviews with CFX employees and coordinate the same with the C. Udave	0.40	170.00
01/11/23	STV	Review chart with sponsors' information, coordinate supplementation of the same and confer with the Hays team re demand letter to CFX sponsors	1.10	467.50
01/11/23	KKP	Confer with R. Crum regarding billing guidelines and categorizing timekeeper time entries.	1.00	425.00
01/11/23	STV	Confer with the team re inspection of Chavez's residence	0.40	170.00
01/11/23	STV	Review company records and determine key employees to call for interviews, prepare chart	1.60	680.00
01/11/23	STV	Emails with Gulfstream and counsel for OT re cell phone imaging	0.30	127.50
01/12/23	STV	Analysis of company documents and evaluate third party claims	3.70	1,572.50



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Date	Attorney	Description	Hours	Amount
01/12/23	STV	Confer with Hays group re employee list and identifying information	0.20	85.00
01/12/23	STV	Confer with C. Udave re calls to CFX employees	0.20	85.00
01/13/23	STV	Coordinate preparation of material for inclusion in fee application and review email from Hays re same	0.30	127.50
01/13/23	STV	Review list of additional CFX sales agents and confer with Hays team re same	0.30	127.50
01/13/23	STV	Review request by counsel for Chavez re receiver's website and confer with the team re same	0.40	170.00
01/13/23	STV	Review demand letters to sponsors and coordinate service of the same	0.40	170.00
01/16/23	STV	Email with R. Ampudia re filing of Receivership order in FL.	0.10	42.50
01/16/23	STV	Call with PLS re subpoena, confer with Hays re same and coordinate preparation of subpoena with team	0.40	170.00
01/16/23	STV	Consider email by T. Thompson, counsel for Chicago investors and confer with the team re same	0.30	127.50
01/16/23	STV	Review email by counsel for investor (M. A.) and respond to same	0.10	42.50
01/17/23	STV	Call with T. Thompson counsel for Chicago investors and confer with the team re same	0.80	340.00
01/17/23	STV	Confer with the E-discovery team re Salesforce accounts and retrieving the data therein	0.70	297.50
01/17/23	STV	Call with Mercedes Benz of Sugarland re subpoena, revise subpoenas to PLS and Microsoft and confer with the team re service	0.80	340.00
01/17/23	STV	Call with Receiver and New Orleans counsel re Microsoft subpoena	0.40	170.00
01/17/23	KKP	Confer with J. Lewis, S. Themeli, S. Askue, G. Hays regarding case strategy and upcoming deadlines.	2.00	850.00
01/17/23	STV	Confer with the team re updates to the receiver's website	0.20	85.00
01/17/23	STV	Prepare for and attend weekly strategy meeting with the team	1.80	765.00
01/17/23	STV	Call and email with Matias Adrougue counsel for CFX investors	0.40	170.00
01/17/23	STV	Review company records re PLS Check Cashiers and money orders and supplement subpoena to the same	0.70	297.50
01/18/23	STV	Coordinate preparation and service of additional demand letters to CFX sales agents	0.40	170.00
01/18/23	STV	Review response to subpoena by Capital One and American Express	0.40	170.00
01/18/23	STV	Coordinate preparation of deposition notices to CFX employees and revise subpoenas and confer with the team re same	2.40	1,020.00



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Date	Attorney	Description	Hours	Amount
01/18/23	STV	Call with counsel for Google re responses to subpoena	0.50	212.50
01/19/23	STV	Consider emails from Salesforce re access to the CFX accounts and new licenses and confer with the team re same	0.30	127.50
01/19/23	STV	Call with counsel for Google re subpoena responses	0.40	170.00
01/19/23	STV	Coordinate updating Receiver's VM message and translation of the same	0.20	85.00
01/19/23	STV	Confer with the e-discovery team re upload of data from witness cell phones	0.20	85.00
01/19/23	STV	Incorporate comments to the liquidation plan and coordinate filing	0.40	170.00
01/19/23	STV	Emails with KCC re claim form for Receiver's website	0.20	85.00
01/19/23	STV	Call with Mercedes BEnc of Sugarland re subpoena responses	0.20	85.00
01/19/23	CAU	Correspond with Sthemeli regarding corresponding with CFX Chicago leader	0.10	42.50
01/20/23	STV	Confer with the e-discovery team re documents to be uploaded onto Relativity	0.20	85.00
01/20/23	STV	Coordinate service of notice of subpoenas	0.30	127.50
01/20/23	STV	Coordinate preparation of additional demand letters to sponsors and review the same	0.70	297.50
01/20/23	STV	Email with Salesforce re access to CFX accounts	0.20	85.00
01/20/23	STV	Review case documents, email correspondence with counsel for Vargas re turnover of the MERcedes and confer with the team re same	1.10	467.50
01/20/23	STV	Confer with the team re receiver's website and translation of additional material	0.70	297.50
01/20/23	STV	Review Waller county 25 acre property sale documents, and coordinate preparation of subpoena related to same	1.10	467.50
01/20/23	KKP	Provide notices of subpoenas to counsel.	0.10	42.50
01/20/23	STV	Review case documents, email with counsel for Gonzalez requesting turnover of the cars and confer with the team re same	0.60	255.00
01/22/23	CAU	Correspond with S Themeli regarding witness interviews; schedule interview with Spanish speaking witness.	0.40	170.00
01/23/23	STV	Analysis of case documents in preparation for witness interview	0.50	212.50
01/23/23	STV	Review Chavez's request for living expenses and email with P. Flack re request for turnover to Vargas and Gonzalez, confer with the team re same	0.80	340.00
01/23/23	STV	Review case documents and email P. Flack re document about Chavez's Hair salon	0.30	127.50



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Date	Attorney	Description	Hours	Amount
01/23/23	STV	Review email from Capital One re subpoena response	0.20	85.00
01/23/23	STV	Email with counsel for Vargas re turnover of automobiles in her possession	0.40	170.00
01/23/23	STV	Review email and investor materials from immigration group	0.40	170.00
01/23/23	STV	Coordinate preparation and service of additional demand letters and review the same	0.40	170.00
01/23/23	STV	Emails with S. A. , CFX FL sales agent	0.20	85.00
01/23/23	STV	Confer with Salesforce re courtesy licenses and access of the data	0.30	127.50
01/23/23	STV	Email from E.E. CFX leader	0.10	42.50
01/23/23	KKP	Confer on call with S. Askue, S. Themeli, G. Hays regarding upcoming deadlines and tasks.	1.20	510.00
01/23/23	STV	Email with real estate agent re offer on 28 Lawrence Marshall Ln	0.20	85.00
01/23/23	STV	Call with I. M. CFX employee re demand letter	0.30	127.50
01/23/23	KKP	Perform update of case law regarding reasonable fees for defendant in receivership.	0.50	212.50
01/24/23	STV	Review response to subpoena by Capital one and confer with the Hays re same	0.50	212.50
01/24/23	STV	Follow up with Salesforce re access to the two CFX accounts	0.20	85.00
01/24/23	STV	Coordinate update of Receiver's website with additional news stories	0.30	127.50
01/24/23	STV	Call with the Receiver re request to allow Chavez additional time at his residence, attorney's fees , employee depositions, offer of real estate and other case matters.	0.40	170.00
01/24/23	STV	Call with Webster re valuation of Chavez personal property	0.30	127.50
01/24/23	STV	Confer with the team Salesforce data	0.20	85.00
01/24/23	STV	Confer with the team re meeting with E. E. CFX Louisiana sales agent	0.60	255.00
01/24/23	STV	Consider request for approval of fees by counsel for Chavez and prepare response to the same	0.30	127.50
01/24/23	STV	Review email from, counsel for Aspire Post Oak and Chavez's request to stay an additional 2 weeks, confer with the receiver re same and respond	0.40	170.00
01/24/23	STV	Review CFX contracts sent by investors	0.20	85.00
01/24/23	STV	Coordinate calls with sales agents	0.20	85.00
01/24/23	STV	Confer with Veritex re service of deposition subpoenas	0.30	127.50
01/24/23	STV	Revise subpoenas for CFX employees G. G. and M.W. and coordinate service and notice	0.50	212.50



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Date	Attorney	Description	Hours	Amount
01/24/23	STV	Review email from Chavez's counsel re attorney's fees, confer with the Receiver re same and respond to Mr. Flack	0.50	212.50
01/25/23	STV	Call and follow up email with Illinois securities office re Chicago sponsors	0.50	212.50
01/25/23	STV	Call with sales agents Santos Balmino, confer with team re same and coordinate follow up call	0.70	297.50
01/25/23	STV	Confer with team re list of investors and updates to Receiver's website	0.40	170.00
01/25/23	STV	Confer with Poutus re sale of car	0.30	127.50
01/25/23	STV	Confer with with counsel for Chavez re attorney's fees, requests for discovery and request for living expenses	1.30	552.50
01/25/23	STV	Consider email by counsel for Gonzalez and docs produced by her, confer with the team re same and follow up strategy	1.40	595.00
01/25/23	STV	Review subpoenas to Coinbase and Styers Realty	0.70	297.50
01/25/23	STV	Review emails and confer with real estate broker re Waller county property appraisal and sale of the same	0.90	382.50
01/26/23	STV	Review email from Aspire Post Oak re payment for 2 weeks	0.20	85.00
01/26/23	STV	Confer with New Orleans counsel re Microsoft Subpoena	0.10	42.50
01/26/23	STV	Review summaries of call with sales agents re demand letters and documents produced	0.50	212.50
01/26/23	STV	Review letter to the court from counsel for Chavez and prepare Receiver's's letter in response	0.40	170.00
01/26/23	STV	Call with Chase bank re response to subpoena and missing information confer with the team re follow up	0.60	255.00
01/26/23	STV	Review email from Chavez's counsel and Aspire Post Oak	0.20	85.00
01/26/23	STV	Consider email from counsel for PRSWTX LLC re response to subpoena, review case documents and respond to the same	0.50	212.50
01/26/23	STV	Coordinate preparation and service of additional subpoenas including to Bank of America	0.40	170.00
01/26/23	STV	Email communications with re additional deposition subpoenas for CFX employees	0.40	170.00
01/27/23	STV	Review Santander consumer response to subpoena	0.80	340.00
01/27/23	STV	Review summary of calls with CFX sponsors N. A. and S. B.	0.40	170.00
01/27/23	STV	Email correspondence with Illinois Securities Office	0.20	85.00
01/27/23	STV	Confer with vendor and team re updates to Receiver's website	0.30	127.50
01/27/23	STV	Call with Chicago investor C. M. and sponsor Z. Y.	1.20	510.00



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Date	Attorney	Description	Hours	Amount
01/28/23	STV	Email with Chicago sponsor	0.10	42.50
01/29/23	STV	Review media coverage of the case and confer with KCC re additions to Receiver's website	0.30	127.50
01/30/23	STV	Prepare for and conduct weekly strategy call with the Receiver and the team to discuss	1.30	552.50
01/30/23	STV	Confer with K. Powell re motion for sale of real property and additional asset searches o third parties	0.40	170.00
01/30/23	STV	Confer with Michael Poutous re sale of the car	0.20	85.00
01/30/23	STV	Draft demand letter to CryptoFX employees	0.50	212.50
01/30/23	STV	Call with counsel for C. M. re witness interview, coordinate her CFX laptop imaging with Gulfstream and confer with the team re same	0.60	255.00
01/30/23	STV	Coordinate additional assets research, service of demand letters and preparation and service of third party subpoenas.	0.40	170.00
01/30/23	STV	Call with Carolyn Martin counsel for California leaders re Receiver's demand and request for production	0.50	212.50
01/30/23	STV	Calls and emails with CFX sales agents and victims	0.60	255.00
01/30/23	KKP	Confer on weekly call with S. Askue, G. Hays, J. Lewis and G. Hays regarding receivership upcoming deadlines and tasks.	1.00	425.00
01/30/23	CMG	Attend team call to discuss next steps with the Receiver's next report and additional asset sales.	1.00	425.00
01/31/23	STV	Review subpoenas responses by Geico	0.60	255.00
01/31/23	STV	Review subpoenas responses by PRWCSWTLCC	0.80	340.00
01/31/23	STV	Follow up on the PDF spreadsheet produced by EE CFX leader	0.20	85.00
01/31/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.50	90.00
01/31/23	STV	Call with EG CFX investor	0.40	170.00
01/31/23	STV	Coordinate translation of additional case documents	0.20	85.00
01/31/23	STV	Confer with the team re inspection of Tidmore lane property	0.30	127.50
01/31/23	STV	Review email and materials sent by FIEL	0.60	255.00
02/01/23	STV	Review subpoena responses from PLS, confer with the team re same, follow up with to counsel for PLS re format of the responses.	0.80	340.00
02/01/23	STV	Call with Flor De Maria and Cithally Columa and informing them of their attorney's call, email with their counsel	0.40	170.00
02/01/23	STV	Call with Chase bank re tax id's	0.20	85.00



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Date	Attorney	Description	Hours	Amount
02/01/23	STV	Call and email with Roberto Zavala Chicago sales agent, request production of CFX spreadsheet and coordinate follow up meeting	0.50	212.50
02/01/23	STV	Call Bob Stern counsel for Reina Guilfarro Louisiana sales agent	0.20	85.00
02/01/23	STV	Consider letter to the court by Mr. Flack, research and prepare response to the same	1.60	680.00
02/01/23	STV	Coordinate payments of vendor, Blalock landlord and Aspire landlord	0.60	255.00
02/01/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
02/02/23	STV	Prepare for conduct interview with R. Z. CFX sales person and coordinate drop off of materials at CHicago office	3.20	1,360.00
02/02/23	STV	Call with Robert Stern counsel for Reina Guilfarro, prepare notes on same	0.50	212.50
02/02/23	STV	Call with Jay Costa Counsel for N. Alvarez, and prepare notes re same	0.40	170.00
02/02/23	STV	Review email and communications from CFX representatives to investors promising payments sent by FIEL	0.30	127.50
02/02/23	STV	Emails with Aspire counsel re security deposit on Chavez's apartment	0.20	85.00
02/02/23	KKP	Perform update of case law regarding requirements for appraisals in motion for sale of real property.	2.00	850.00
02/03/23	STV	Review email from FIEL, voice mail and messages to investors re payment of CFX contracts and continuing fraud, confer with the team re same and supplement letter to the court	1.10	467.50
02/03/23	STV	Emails with Salesforce and team re access to Salesforce data	0.20	85.00
02/03/23	STV	Review contract with RingCentral, call customer service and email with account manager re CBT phone line, confer with the team same, review online account	2.30	977.50
02/03/23	STV	Coordinate preparation and service of additional demand letters to CFX sales agents	0.10	42.50
02/03/23	KKP	Perform analysis of ongoing CFX business operations.	1.00	425.00
02/03/23	STV	Review email and materials sent by RR, CFX sales person	0.40	170.00
02/03/23	STV	Incorporate Receiver's comments in the letter to the court re attorney's fees and additional information.	1.30	552.50
02/03/23	KKP	Confer with S. Themeli regarding Ring Central.	1.00	425.00
02/04/23	STV	Review email from R. Kallinen counsel for Z.S. CFX sales person and respond to same	0.20	85.00



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Date	Attorney	Description	Hours	Amount
02/05/23	STV	Review email from R. Z, CFX leader	0.10	42.50
02/06/23	KKP	Revise subpoena for Styers reality.	0.20	85.00
02/06/23	KKP	Confer with J. Lewis, S. Askue, G. Hays, S. Themeli regarding receivership tasks.	1.60	680.00
02/06/23	STV	Confer with the discovery team re Salesforce data; confer with team re inventory of investor calls; coordinate additional CFS employee subpoenas and demand letters; draft cease and desist letter to A.M.; coordinate research on additional third parties and Receivership assets and preparation and filing of lis pendens	2.70	1,147.50
02/06/23	STV	Prepare for and conduct weekly strategy call with the team to discuss ongoing violation of the Receivership order through use of Ring Central, real estate sale, sale of personal property, litigation plan against third parties and other matters	1.70	722.50
02/06/23	STV	Review emails and documents from R.Z. CFX sales person	0.30	127.50
02/06/23	STV	Call with counsel for CFX email N.R.	0.30	127.50
02/07/23	RAA	Prepare for and participate in planning call with Sonila Themeli.	0.90	382.50
02/07/23	LJG	Research to obtain requested Accurint reports for Kierra Powell.	0.50	90.00
02/07/23	ARSV	Update individual case material with information from recent discovery.	0.10	25.50
02/07/23	STV	Email correspondence with CFX sales persons S.R., I.S. and review case documents re same	0.60	255.00
02/07/23	STV	Review documents produced by CFX sales person E.E.	0.30	127.50
02/07/23	STV	Review email from counsel from Benvenuto and coordinate payment of allowance	0.30	127.50
02/07/23	STV	Call with the e-discovery team and S. Askue re Salesforce data and download of the same	0.40	170.00
02/08/23	STV	Ring central freeze letter, download RIng central info and data	0.80	340.00
02/08/23	KKP	Manage data provided by former CFX employee E.E.	0.30	127.50
02/08/23	KKP	Conduct CFX employee interview with C.M.	3.20	1,360.00
02/08/23	KKP	Perform analysis of online data, photos, videos provided by CFX investor O.C.	1.00	425.00
02/08/23	KKP	Confer with D. Daniel regarding managing google drive data provided by former CFX employee and investors.	0.60	255.00
02/08/23	KKP	Draft spreadsheet with login information for CFX google accounts.	0.30	127.50
02/08/23	KKP	Draft freeze letter to PLS financial.	0.70	297.50



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Date	Attorney	Description	Hours	Amount
02/08/23	KKP	Confer with witness O.C regarding Chicago investors and documents.	0.30	127.50
02/08/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.50	90.00
02/08/23	STV	Confer with counsel for SEC and the team re California outreach event and upcoming employee depositions	0.40	170.00
02/09/23	STV	Attend meeting with Santa Monica CFX investors and SEC counsel	1.30	552.50
02/09/23	KKP	Perform update of case law relating to bank secrecy act and rules regarding money orders.	3.00	1,275.00
02/09/23	STV	Review email from D. Bell counsel for Robles	0.20	85.00
02/09/23	STV	Call and email with counsel for Providence title company and coordinate supplementation of the subpoena	0.60	255.00
02/09/23	STV	Call with counsel for CFX sales person M.C.	0.30	127.50
02/09/23	STV	Email with counsel CFS sales person I.S.	0.20	85.00
02/09/23	STV	Follow up with RingCentral re CFX phone service	0.20	85.00
02/10/23	STV	Email with HM CFX sales person	0.10	42.50
02/10/23	STV	Call with counsel for Nancy Reynosa CFX employee and confer with the team re same	0.50	212.50
02/10/23	STV	Call with Dan Cogdell and confer with the Receiver and his team about the same	0.80	340.00
02/10/23	STV	Prepare analysis of interview with CFX employee CM.	0.60	255.00
02/10/23	STV	Confer with the receiver's team re meeting with Santa Monica investors	0.20	85.00
02/10/23	STV	Coordinate with the Hays team analysis of Salesforce data	0.30	127.50
02/10/23	STV	Review case documents and Coordinate research on additional third parties and asset analysis	0.40	170.00
02/10/23	STV	Call with counsel for Illinois Securities Office	0.30	127.50
02/10/23	STV	Call and email with counsel for Amrock re receiver's subpoena for production of documents and coordinate amendments to the same	0.40	170.00
02/10/23	STV	Email with Ring Central representative	0.20	85.00
02/10/23	STV	Confer with FL counsel re filing of receivership order	0.20	85.00
02/10/23	STV	Call with Andres Garcia CFX investor	0.20	85.00
02/10/23	STV	Prepare for and conduct interview with CFX sponsor I.S. and confer with the team re same	3.20	1,360.00
02/10/23	STV	Coordinate calls and amended demand to JM CFX sponsor	0.20	85.00
02/10/23	STV	Confer with counsel for Providence Title re amendment of the subpoena	0.20	85.00



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Date	Attorney	Description	Hours	Amount
02/10/23	LJG	Research to obtain Accurint reports on individuals for Kierra Powell.	0.10	18.00
02/12/23	STV	Analysis of fraudulent transfer case law	1.30	552.50
02/13/23	KKP	Perform analysis and revisions of real property contract and supporting exhibits.	2.50	1,062.50
02/13/23	KKP	Confer with S. Themeli and J Lewis regarding filing ancillary actions.	0.50	212.50
02/13/23	KKP	Confer with J. Lewis, S. Themeli, S. Askue regarding upcoming deadlines and tasks.	2.40	1,020.00
02/13/23	KKP	Confer with SEC counsel regarding case administration.	0.90	382.50
02/13/23	RAA	Review filings prepared by Sonila Themeli. Discuss with LAA.	2.90	1,232.50
02/13/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
02/13/23	STV	Email with P. Flack re Chavez's car and employee depositions	0.20	85.00
02/13/23	STV	Coordinate case management tasks, sales agent research, filing of receivership order in SD Florida, and additional demand letters to employees	0.90	382.50
02/13/23	STV	Prepare for and attend call with SEC and Receiver team re third party claims	1.80	765.00
02/13/23	STV	Prepare for and conduct strategy weekly call to discuss asset analysis and disposition, third-party claims, document collection, depositions, etc.	2.30	977.50
02/14/23	STV	Call with Jay Costa, counsel for NA, CFX sales person re document production	0.30	127.50
02/14/23	STV	Review emails from CFX investors	0.30	127.50
02/14/23	STV	Call with Hays group re asset analysis and motion to expand receivership	0.40	170.00
02/14/23	STV	Review email from Block Inc. re subpoena and confer with the team re same	0.20	85.00
02/15/23	STV	Consider and respond to mail from Illinois Securities office and coordinate preparation of requested documents and information	0.40	170.00
02/15/23	STV	Consider and respond to email from Aspire Post Oak, Chavez landlord re security deposit	0.20	85.00
02/15/23	STV	Coordinate service of filing in SDTX.	0.20	85.00
02/15/23	STV	Revise letter to JM CFX employee	0.30	127.50
02/15/23	STV	Consider and respond to emails from sales people re demand letters and information on commissions	0.70	297.50
02/16/23	STV	Call with L. Lao, Chicago sponsor	0.20	85.00
02/16/23	STV	Coordinate research of additional leaders and demand letters to the same	0.40	170.00



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Date	Attorney	Description	Hours	Amount
02/16/23	STV	Confer with D Cogdell and team re Benvenuto's bank account information and monthly allowance	0.20	85.00
02/16/23	STV	Review response to subpoena from Chase bank re Vargas	0.60	255.00
02/17/23	STV	Email with R. Kallinen counsel for Z. B. re production of documents	0.10	42.50
02/17/23	STV	Call with A.G , CFX investor	0.30	127.50
02/17/23	RAA	Call judicial clerk to confirm registration of case, receiver, and council for receiver. Discuss internally with case team.	1.00	425.00
02/17/23	STV	Confer with SEC counsel re ongoing operations in California, draft cease and desist letter to Flor De Maria, coordinate research of third party assets and preparation of lis pendens, coordinate interviews with CFX employees	3.20	1,360.00
02/17/23	STV	Review email and documents produced by AG, CFX employee	0.20	85.00
02/20/23	KKP	Draft receiver's responses to SEC Illinois discovery requests.	1.00	425.00
02/20/23	KKP	Confer on internal team call regarding upcoming deadlines and tasks.	0.90	382.50
02/20/23	STV	Review amended fee application	0.40	170.00
02/20/23	STV	Prepare for and conduct interview with CFX employee A. G.	2.60	1,105.00
02/20/23	STV	Research agreed document depository order	0.50	212.50
02/20/23	STV	Call with G. Hays re Ponzi report and motion to expand receivership	0.40	170.00
02/20/23	STV	Prepare for and attend weekly strategy call with the receiver and the team re upcoming tasks, including employee interviews, GG deposition, motion to expand receivership, and subpoenas	1.20	510.00
02/21/23	KKP	Draft receiver's responses to SEC Illinois discovery requests.	2.30	977.50
02/21/23	STV	Confer with the team re new offer on Hogan Lane property, confer with counsel for Flor de Maria, review CFX spreadsheet by sales person RT; confer with counsel for Chavez and SEC re CFX employee deposition; review documents in response to Illinois Secretary of State	3.80	1,615.00
02/22/23	STV	Review email from Plateau Land and Wildlife Management re invoice on work on Waller county Clear creek property	0.20	85.00
02/22/23	STV	Revise responses to subpoena by Illinois Secretary of State, prepare letter and coordinate preparation of the responsive documents/information	0.90	382.50
02/22/23	STV	Email with CFX sponsor R.T. and coordinate interview	0.20	85.00



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Date	Attorney	Description	Hours	Amount
02/22/23	CAU	Correspond with witness RT and schedule call	0.40	170.00
02/22/23	LJG	Research to obtain Accurint reports on individuals for Kierra Powell.	0.10	18.00
02/23/23	STV	Finalize fee application and coordinate filing, revise response to subpoena to Illinois Secretary of State and coordinate service of the same, call with Bill Bets counsel for Otis Styers	1.90	807.50
02/23/23	STV	Email with counsel for Cadence Bank re responses to subpoena	0.10	42.50
02/23/23	STV	Call and email with counsel Styers Realty re third party subpoena	0.40	170.00
02/23/23	STV	Coordinate research on additional third parties and supplementation of internal records and additional third party subpoenas	0.40	170.00
02/23/23	STV	Prepare for and conduct call with CFX leader RT	2.20	935.00
02/23/23	KKP	Revise responses to SEC Illinois subpoena.	0.50	212.50
02/23/23	CAU	Attend call interview with CFX leader RT and prepare summary of the same	1.90	807.50
02/24/23	STV	Review email from collection agency re Cort furniture invoice and respond to the same	0.40	170.00
02/24/23	STV	Prepare for and conduct interview with former CFX employee/contractor G. G. and confer with the team re same	2.10	892.50
02/24/23	STV	Review email from Waller county appraisal district	0.30	127.50
02/27/23	KKP	Confer on weekly internal team call regarding upcoming court hearing and outstanding action items.	1.20	510.00
02/27/23	CMG	Attend weekly team strategy call regarding outstanding tasks.	1.20	510.00
02/27/23	STV	Review case documents and confer with the e-discovery team re document production	1.40	595.00
02/27/23	STV	Review case documents re former CFX employee M.W. , coordinate interview with MW, coordinate additional document subpoenas, research motion to invest receivership funds and confer with the receiver re same.	2.30	977.50
02/27/23	STV	Prepare for and conduct strategy call with the team to discuss sale of real estate, production of documents, additional subpoenas, witness interviews, conference with the court, etc	1.40	595.00
02/27/23	STV	Review discovery responses from First American Title	1.80	765.00
02/28/23	STV	Coordinate updates to the Receiver's website	0.30	127.50
02/28/23	STV	Coordinate preparation of documents for production to counsel for Chavez	0.20	85.00
02/28/23	STV	Review email from A.D., former CFX employee	0.20	85.00



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Date	Attorney	Description	Hours	Amount
02/28/23	STV	Email with counsel for Block and Providence Title re responses to subpoena	0.30	127.50
02/28/23	CAU	Further research efforts associated with fact witness investigations; correspond with supervisor regarding fact witnesses.	0.40	170.00
03/01/23	KKP	Confer with Sonila regarding former CFX Employee M. Wong	0.30	127.50
03/01/23	STV	Coordinate production of documents in response to Chavez's request for documents	0.30	127.50
03/01/23	STV	Prepare for interview with M.W., CFX employee	1.10	467.50
03/01/23	STV	Analysis of case law on attorney's fees and prepare for conference with the court; review case documents on Waller county re Clear Creek property and Wild Life Management evaluation, confer with Mark Hefner of Plateau Land Wildlife Management company re tax valuation of the property	6.10	2,592.50
03/01/23	STV	Analysis of third party subpoena and prepare responses to the same.	1.20	510.00
03/02/23	STV	Review case documents and prepare responses to subpoena and confer with the e-discovery team re same	0.80	340.00
03/02/23	STV	Attend conference with the court and confer with the Receiver re same; call with counsel for SEC	1.80	765.00
03/02/23	STV	Confer with the team Salesforce data and reports; confer with counsel for Chavez re turnover of funds; review case documents and public real property records, coordinate preparation of additional lis pendens and review the same; email correspondence with counsel for A.M. CFX employee re deposition subpoena	2.00	850.00
03/03/23	STV	Analysis of case documents and claims against third party in possession of receivership assets	1.70	722.50
03/03/23	STV	Coordinate review of property records and preparation and filing of additional lis pendens; review emails from title company re closing of sale of property and from real estate broker re listing and confer with the team re additional documents	1.20	510.00
03/03/23	STV	Email correspondence with counsel for CFX sales person re document requests; confer with the team, title company and real estate broker re closing of real estate sale, and motion to approve sale of second lot	2.30	977.50
03/05/23	STV	Email correspondence with counsel for CFX sales person S.R.	0.20	85.00
03/06/23	KKP	Confer with internal team in order to discuss upcoming deadlines.	1.00	425.00



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Date	Attorney	Description	Hours	Amount
03/06/23	STV	Review case documents and coordinate tracing of additional crypto wallets; revise subpoenas to request records from crypto currency platforms re additional wallets/accounts	0.70	297.50
03/06/23	STV	Emails and call with M. Wynne counsel for CFX sales person S.R. re request for documents	0.40	170.00
03/06/23	STV	Prepare for and conduct weekly strategy meeting with the receiver and team to discuss upcoming tasks	1.20	510.00
03/06/23	STV	Call and emails with third parties re production of documents in response to subpoena	0.20	85.00
03/06/23	STV	Call with e-discovery team re production of documents, prepare log of documents to be produced	0.30	127.50
03/07/23	STV	Coordinate preparation of notices of lis pendens, preparation of additional subpoenas, and call with counsel for Block Inc.; confer with title company re closing on sale of property ; coordinate production of documents to Mr. Chavez	1.60	680.00
03/08/23	STV	Analysis of case law re Ponzi presumption and fraudulent transfer	3.80	1,615.00
03/08/23	STV	Confer with Plateau Wildlife management re status of the valuation of Waller county property; email correspondence with the appraiser re additional appraisal for the Mack Washington property; research receivership assets and Chavez business	1.40	595.00
03/08/23	STV	Research and draft motion to invest receivership funds	0.30	127.50
03/09/23	STV	Confer with Mark Hefner at Plateau Land & Wildlife Management re Waller county property valuation; confer with the team and title company re closing requirements; supplement and revise subpoenas and coordinate service of the same; review email from Illinois secretary of state	1.30	552.50
03/10/23	STV	Confer with M. Hefner of Plateau re valuation of Waller county property and district decision	0.20	85.00
03/10/23	STV	Review email and contracts by CFX investor F.Q.	0.20	85.00
03/13/23	STV	Consider email from Illinois Secretary of state re Illinois resident contracts and respond to same	0.20	85.00
03/13/23	STV	Research and draft motion to invest receivership funds	2.00	850.00
03/13/23	STV	Confer with the team re motion for sale of real estate and exhibits in support thereof, sale of receivership personal property, confer with counsel for Vargas re turnover of automobile;	1.20	510.00
03/13/23	STV	Review email from counsel for Quest Trust re subpoena	0.20	85.00



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Date	Attorney	Description	Hours	Amount
03/14/23	STV	Coordinate preparation and filing of notice of receivership order in GA, new subpoenas, prepare for hearing on motion for who cause, review response to subpoena by Bianca,	2.50	1,062.50
03/15/23	STV	Follow up on documents from CFX sales person N.A.; call with Illinois securities office re order, analysis of possible claims against third parties	4.30	1,827.50
03/16/23	STV	Coordinate payment of third party vendors; research of receivership assets; review case law on Ponzi scheme. confer with M. Hefner of Plateau re Waller county property valuation; confer with the Receiver and team re Signature bank developments; revise letter to CapitalOne re release of title	2.60	1,105.00
03/17/23	STV	Call with CFX sponsor H.A. and coordinate interview	0.30	127.50
03/20/23	KKP	CryptoFX internal team call.	1.30	552.50
03/20/23	KKP	Confer with J. Lewis regarding documents needed for 0 Hogan lane closing.	0.10	42.50
03/20/23	CMG	Attend weekly strategy call to determine additional potential suits to be filed against other entities.	0.60	255.00
03/20/23	STV	Prepare for and conduct weekly strategy call with the Receiver and the team.	1.40	595.00
03/20/23	STV	emails with the team re discovery responses	0.20	85.00
03/21/23	STV	Draft Response to Chavez's motion for fees, call with investor FQ; review documents produced by Chicago sales persons, review response to subpoena by Binance; review contract with Plateau Wild Life management; coordinate records managements;	8.20	3,485.00
03/22/23	KKP	Manage data files relating to CM	0.50	212.50
03/22/23	STV	Finalize opposition to motion for fees and coordinate filing; review documents produced by First Community Bank; review case law and pleadings in preparation for upcoming hearing on motion for show case; review document by Plateau Wild Life management; call with counsel for SEC; confer with real estate broker and title company re closing of sale of property; call with Scott Askue re CFX accounting records; coordinate update of receiver's website	9.50	4,037.50
03/23/23	STV	Review RingCentral response to Subpoena and coordinate follow up	0.30	127.50
03/24/23	STV	Review order on motion for show cause and fee application and Confer with the Receiver and team re same	0.30	127.50
03/27/23	STV	prepare for and conduct weekly strategy call with the Receiver	0.60	255.00



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Date	Attorney	Description	Hours	Amount
03/27/23	STV	Emails with the team re closing on property sale; emails with FIEL immigration group re Louisiana operations, confer with the Hays group re Coinbase 1099s; emails with appraiser re appraisal of Waller county 25 acre lot; review response to subpoena by Pathward.	1.80	765.00
03/27/23	STV	Call with Shane Davis of Plateau Wild Management re Waller county property valuation	0.30	127.50
03/27/23	STV	Review company documents and analysis of claims against third party	3.10	1,317.50
03/29/23	KKP	Communicate regarding Chavez's personal property and inventory.	0.20	85.00
03/29/23	STV	Review documents to be produced in response to document requests and confer with the e-discovery team re same	1.30	552.50
03/30/23	STV	Email correspondence with counsel for SR re document production	0.20	85.00
03/30/23	STV	Call with Doug Vargas counsel for victims	0.20	85.00
03/31/23	KKP	Communicate regarding CFX database passwords and Receiver's fee application.	0.20	85.00
03/31/23	STV	Confer with the team re Salesforce account	0.40	170.00
03/31/23	STV	Confer with Connecticut, Massachusetts and NY counsel re filing of Receivership order and coordinate filing; confer with the team re accounting records and review of the same; confer with M. Hefner of Plateau Land and Wildlife management re Waller county property, call with counsel for California leaders	3.20	1,360.00
03/31/23	STV	Review documents to be produced in response to Chavez request for documents.	2.10	892.50
Subtotal for SEC04		Case Admin	282.40	\$119,341.50
SEC05		Claims Admin		
02/10/23	RAA	Discuss matter with Sonila Themeli. Set up matter and create matter folder.	1.00	\$425.00
Subtotal for SEC05		Claims Admin	1.00	\$425.00
SEC08		Business Analysis		
01/23/23	CAU	Correspond with S. Themeli re witness interviews and attend interview with Chicago CFX leader	2.30	\$977.50
01/24/23	CAU	Correspond with S. Themeli re witness interviews; draft email in Spanish and send it to a witness to schedule an interview this week; conduct interview of E.E. and coordinate future meeting with witness S.A.	2.40	1,020.00



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Date	Attorney	Description	Hours	Amount
01/25/23	CAU	Correspond with S. Themeli re CFX witness interviews; draft email in Spanish and send it to a witness to schedule an interview this week with BS.	0.50	212.50
01/26/23	CAU	Prepare for and conduct interview with SA, prepare analysis of call and confer with team re same	1.40	595.00
01/26/23	CAU	Review demand letter; correspond with S Themeli re witness interviews; draft email in Spanish and send it to a witness to schedule an interview this week with NA	0.90	382.50
01/26/23	CAU	Prepare for and conduct interview with CFX employee	0.60	255.00
01/27/23	CAU	Prepare for and conduct interview with CFX employee and prepare summary of call for the team	1.30	552.50
02/01/23	CAU	Correspond with S Themeli regarding meeting with Chicago leader	0.20	85.00
02/02/23	CAU	Prepare for and conduct interview with RZ and prepare summary of the interview.	2.50	1,062.50
03/20/23	CAU	Confer with team re interview of HA, CFX leader	0.30	127.50
03/23/23	CAU	Confer with S. Themeli re interview of HA, follow up call with HA	0.10	42.50
03/30/23	CAU	Correspond with Juan Ruiz Larios and Nolberta Gomez regarding receivership case.	0.40	170.00
03/30/23	CMG	Communicate with Banking Secrecy Act expert regarding possible BSA claims against PLS money order company.	1.00	425.00
Subtotal for SEC08		Business Analysis	13.90	\$5,907.50

SEC10 Data Analysis

01/19/23	LWP	Provide matter-specific database, document and case team support.	0.40	\$72.00
01/20/23	LWP	Preparing all docs in database that have not yet had a production number branded for production.	1.00	180.00
01/27/23	LWP	Provide matter-specific database, document and case team support.	0.20	36.00
02/06/23	LWP	Provide matter-specific database, document and case team support.	1.20	216.00
02/07/23	LWP	Provide matter-specific database, document and case team support.	0.90	162.00
02/17/23	LWP	Preparing all docs in database that have not yet had a production number branded for production.	1.00	180.00
02/27/23	LWP	Provide matter-specific database, document and case team support.	1.50	270.00
02/27/23	LWP	Preparing documents for production	1.50	270.00
02/28/23	LWP	Preparing documents for production	1.00	180.00
03/01/23	LWP	Preparing documents for production	0.80	144.00



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Date	Attorney	Description	Hours	Amount
03/02/23	LWP	Preparing documents for production	0.80	144.00
03/06/23	LWP	Provide matter-specific database, document and case team support.	0.50	90.00
03/07/23	LWP	Preparing documents for production	0.50	90.00
03/08/23	LWP	Provide matter-specific database, document and case team support.	0.30	54.00
03/16/23	LWP	Provide matter-specific database, document and case team support.	0.40	72.00
03/27/23	LWP	Provide matter-specific database, document and case team support.	0.40	72.00
03/28/23	LWP	Provide matter-specific database, document and case team support.	0.60	108.00
03/29/23	LWP	Preparing documents for production	1.00	180.00
03/29/23	LWP	Provide matter-specific database, document and case team support.	0.60	108.00
03/30/23	LWP	Preparing documents for production	0.60	108.00
03/31/23	LWP	Provide matter-specific database, document and case team support.	0.90	162.00
Subtotal for SEC10		Data Analysis	16.10	\$2,898.00

SEC11 Status Reports

01/26/23	STV	Review case documents and prepare Receiver's quarterly report	1.70	\$722.50
01/27/23	STV	Call with Hays re quarterly report and supplement the report	0.50	212.50
01/29/23	STV	Draft Receiver's first quarterly report and coordinate preparation of exhibits	2.70	1,147.50
01/30/23	STV	Supplement and revise Receiver's first quarterly report and coordinate preparation of exhibits	2.40	1,020.00
01/31/23	STV	Finalize second interim report and exhibits and coordinate filing	1.60	680.00
Subtotal for SEC11		Status Reports	8.90	\$3,782.50

SEC12 Litigation Consulting

01/19/23	STV	Coordinate service of additional demand letters, deposition subpoenas and confer with Louisiana counsel re notice of appearance	1.90	\$807.50
01/20/23	LWP	Provide matter-specific database, document and case team support.	0.30	54.00
01/23/23	ALTZ	Communicate with Ms. Themeli regarding the Salesforce access.	0.10	42.50
01/23/23	ALTZ	Research Salesforce export options.	0.80	340.00



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Date	Attorney	Description	Hours	Amount
01/24/23	ALTZ	Communicate with Ms. Themeli regarding exporting Salesforce data.	0.10	42.50
01/24/23	ALTZ	Research other options for exporting Salesforce data.	0.60	255.00
01/25/23	ALTZ	Communicate with Ms. Herr and Mr. Thomas regarding the Salesforce access.	0.10	42.50
02/02/23	ALTZ	Communicate with Ms. Gilmer Herr regarding access to Salesforce.	0.10	42.50
02/03/23	ALTZ	Communicate with Ms. Themeli regarding Salesforce access.	0.10	42.50
02/03/23	ALTZ	Communicate with Ms. Themeli regarding access to Salesforce.	0.10	42.50
02/06/23	ALTZ	Communicate with Mr. Percy regarding Salesforce data processing and hosting.	0.10	42.50
02/06/23	ALTZ	Telephone conference with Mr. Percy regarding Salesforce data processing and hosting options.	0.50	212.50
02/06/23	ALTZ	Communicate with Mr. Askue regarding Salesforce viewing options.	0.10	42.50
02/07/23	ALTZ	Video conference with Mr. Askue, Ms. Themeli and Mr. Percy regarding Salesforce reports and data.	0.80	340.00
02/07/23	ALTZ	Communicate with Mr. Askue regarding Salesforce.	0.10	42.50
02/13/23	STV	Analysis of case law on the Ponzi presumption	1.20	510.00
02/28/23	ALTZ	Telephone conference with Mr. Percy regarding the Salesforce data.	0.10	42.50
03/01/23	ALTZ	Communicate with Mr. Askue and Ms. Themeli regarding existing Salesforce reports.	0.10	42.50
03/01/23	ALTZ	Communicate with Salesforce regarding additional license time.	0.10	42.50
03/01/23	ALTZ	Search for and exported existing Salesforce reports.	2.70	1,147.50
03/02/23	ALTZ	Review Salesforce online contracts.	0.20	85.00
03/02/23	ALTZ	Communicate with Mr. Askue and Ms. Themeli regarding Salesforce investor contracts.	0.10	42.50
03/07/23	ALTZ	Communicate with Ms. Themeli regarding the Salesforce data and reports.	0.10	42.50
03/07/23	ALTZ	Communicate with Mr. Percy regarding the Salesforce data and reports.	0.10	42.50
03/07/23	ALTZ	Prepare Salesforce data and reports for the team	0.20	85.00
03/07/23	ALTZ	Communicate with Mr. Askue regarding the Salesforce data access issues.	0.10	42.50
03/08/23	ALTZ	Analyze the Salesforce data to locate additional Salesforce reports.	6.20	2,635.00
03/08/23	ALTZ	Communicate with Mr. Askue regarding the additional Salesforce reports.	0.10	42.50
03/08/23	ALTZ	Communicate with Ms. Themeli regarding a central location for the Salesforce data and reports.	0.10	42.50



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Date	Attorney	Description	Hours	Amount
03/10/23	ALTZ	Communicate with Ms. Themeli regarding the SalesForce data and updated reports.	0.10	42.50
03/14/23	ALTZ	Communicate with Ms. Themeli regarding the SalesForce data and updated reports.	0.10	42.50
03/31/23	ALTZ	Communicate with Ms. Themeli and Mr. Askue regarding extending SalesForce.	0.10	42.50
03/31/23	ALTZ	Communicate with Ms. Herr of SalesForce regarding extending SalesForce.	0.10	42.50
03/31/23	ALTZ	Multiple Telephone conversations with SalesForce regarding extending SalesForce.	1.80	765.00
Subtotal for SEC12 Litigation Consulting			19.40	\$8,171.50

SEC13 Litigation

01/03/23	STV	Analysis of case law on motion to expand receivership	1.40	\$595.00
01/03/23	STV	Confer with Coinbase re extension on response to subpoena and coordinate preparation of subpoena on additional cryptocurrency accounts	0.40	170.00
01/03/23	STV	Revise subpoena to A. Vargas and email counsel re same	0.60	255.00
01/03/23	STV	Review Chavez's response to request for inspection and email Mr. Flack re meet and confer	0.20	85.00
01/03/23	MKF	Organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.00	730.00
01/03/23	MKF	Preparation of subpoena for documents to Microsoft, Google, Coinbase and Angelica Vargas.	3.00	1,095.00
01/04/23	STV	Confer with Robert Felder re filing of ancillary proceeding and registration of receivership order in California; respond to various case management emails, coordinate additional discovery requests	0.90	382.50
01/04/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	3.00	1,095.00
01/04/23	MKF	Preparation of Receiver's Subpoena for Documents regarding CFX leaders O. T., C. Cruz and J. T..	3.00	1,095.00
01/05/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	3.00	1,095.00
01/05/23	MKF	Preparation of Receiver's Subpoena for Documents regarding American Express and Santander Bank.	2.50	912.50
01/06/23	STV	Review case documents in preparation of deposition of Tony Lemus	4.80	2,040.00
01/06/23	STV	Review registration of the receivership order in the Central District of CA and confer with the California team re same	0.50	212.50



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Date	Attorney	Description	Hours	Amount
01/06/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.00	730.00
01/08/23	STV	Prepare exhibits and outline for deposition of T. Lemus	2.10	892.50
01/09/23	STV	Take deposition of Tony Lemus employee of CFX and confer with the team re same	6.50	2,762.50
01/10/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.00	730.00
01/11/23	STV	Review Chavez's requests for production of documents and confer with the team re same	0.60	255.00
01/11/23	STV	Coordinate service of filing of receivership order in CDCA.	0.30	127.50
01/11/23	STV	Coordinate service of demand letters and exhibits to CFX sponsors	0.40	170.00
01/11/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.50	912.50
01/12/23	STV	Review Chavez's discovery requests and confer with the team re same	1.00	425.00
01/12/23	STV	Review Google's response to Subpoena and email correspondence with counsel for Google	0.30	127.50
01/12/23	STV	Prepare for and conduct call with counsel for Salesforce re subpoena, confer with the team re CFX Salesforce account	1.10	467.50
01/12/23	STV	Call with A. M., CFX employee re interview and confer with the team re same	0.40	170.00
01/12/23	STV	Call with Salesforce counsel re response to subpoena and access to data and confer with the team re same.	0.70	297.50
01/12/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.00	730.00
01/13/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.50	912.50
01/17/23	STV	Review Chavez's response to motion for show cause	0.50	212.50
01/17/23	MKF	Preparation of Receiver's Subpoena for Documents regarding PLS Financial Services, Mercedes-Benz of Sugar Land and Microsoft.	3.00	1,095.00
01/17/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.00	730.00



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Date	Attorney	Description	Hours	Amount
01/18/23	STV	Analysis of cases cited in Chavez's response to motion for show cause and in preparation for drafting of the reply	0.30	127.50
01/18/23	STV	Review response to motion for show cause and exhibits to the same	3.20	1,360.00
01/18/23	STV	Review company documents in preparation for meeting with CFX employee A. M.	2.20	935.00
01/18/23	MKF	Organization of Demand Letters to CFX Sponsors.	2.00	730.00
01/18/23	MKF	Preparation of Receiver's Subpoena to testify regarding N. C.	1.00	365.00
01/19/23	STV	Call with counsel for N. Reynosa CFX employee	0.30	127.50
01/19/23	STV	Review Hays' analysis of G. C., CFX Leader, spreadsheet	0.20	85.00
01/19/23	STV	Emails with counsel for Vargas re responses to subpoena	0.20	85.00
01/19/23	STV	Analysis of Fifth amendment privilege as it applies to documents and entities	1.60	680.00
01/19/23	STV	Call with G. C. Chicago leader re demand letter and scheduling an interview	0.40	170.00
01/19/23	STV	Call and email correspondence with D. Gamboa re Chicago investors	0.60	255.00
01/19/23	MKF	Continued organization of Demand Letters to CFX Sponsors.	2.00	730.00
01/19/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.50	912.50
01/19/23	MKF	Preparation of Receiver's Subpoena to Testify re CFX employees	3.00	1,095.00
01/20/23	STV	Confer with vendor re service of deposition subpoenas to CFX employees	0.30	127.50
01/20/23	STV	Research and draft reply in support of motion for show cause	1.20	510.00
01/20/23	STV	Update deposition subpoena to Nancy Reynosa and confer with her counsel re same	0.60	255.00
01/20/23	STV	Review subpoena responses from Mercedes of Sugarland and confer with the team re same	0.50	212.50
01/20/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	3.00	1,095.00
01/23/23	STV	Prepare for and conduct interview with G. C., Chicago leader, confer with the team re CFX spreadsheet produced by her	3.70	1,572.50
01/23/23	STV	Prepare for and conduct weekly strategy call with the team	1.10	467.50
01/23/23	STV	Draft reply in support of motion for show cause	0.40	170.00



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Date	Attorney	Description	Hours	Amount
01/23/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Star Motor Cars and West Houston Volkswagen.	2.00	730.00
01/24/23	STV	Review case documents, research, and draft reply in support of motion to show cause	2.20	935.00
01/24/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	2.00	730.00
01/24/23	MKF	Preparation of Receiver's Subpoena to Testify and produce Documents for CFX employyes and third parties	2.00	730.00
01/25/23	STV	Review case documents and Chavez's response and supplement reply in support of motion to show cause	2.50	1,062.50
01/25/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Coinbase.	1.00	365.00
01/26/23	STV	Review case documents and Chavez's response, research, supplement reply in support of motion to show cause and prepare exhibits, incorporate the Receiver's comments	3.60	1,530.00
01/26/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	3.00	1,095.00
01/26/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Bank of America.	1.00	365.00
01/27/23	STV	Incorporate team's edits to the reply in support of motion to show cause, revise exhibits and coordinate filing	1.20	510.00
01/27/23	MKF	Preparation of received Demand Letter response materials received from G. C. for substantive attorney review.	2.00	730.00
01/27/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	1.50	547.50
01/30/23	STV	Review responses to requests for production to Vargas	0.30	127.50
01/30/23	MKF	Continued preparation of Receiver's Subpoena for Documents regarding Star Motors Cars, West Houston Volkswagen and Providence Title Company.	2.00	730.00
01/31/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Amrock LLC, Cadence Bank and Susser Bank.	2.50	912.50
01/31/23	MKF	Continued organization of received materials in response to Receiver's Subpoena for Documents for substantive attorney review.	3.00	1,095.00
01/31/23	MKF	Organization of Demand Letters to CFX Sponsors.	2.00	730.00



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Date	Attorney	Description	Hours	Amount
02/01/23	STV	Review case materials and confer with K. Powell re motion to approve sale of real estate	1.00	425.00
02/01/23	MKF	Review and analysis of CFX Sales Agents information and supporting data for substantive attorney review.	1.00	365.00
02/02/23	MKF	Preparation of Demand Letter to R. B. Sapon.	0.50	182.50
02/02/23	STV	Confer with vendor re service of deposition subpoenas to employees	0.20	85.00
02/02/23	STV	Call with counsel for SEC	0.30	127.50
02/02/23	STV	Emails with D. Adler counsel for C. M. re interview	0.20	85.00
02/02/23	STV	Draft cease desist letter and demand to RS, CFX sales agent and coordinate service	0.50	212.50
02/02/23	STV	Research and draft response to letter to the court re attorney's fees by Mr. Flack	3.80	1,615.00
02/02/23	STV	Confer with the team third party claims and subpoenas to cryptocurrency platforms and money order companies	0.30	127.50
02/03/23	MKF	Preparation of Demand Letters to CFX Sponsors	2.50	912.50
02/06/23	STV	Analysis of third party litigation strategy	1.30	552.50
02/06/23	MKF	Preparation of Demand Letters to CFX Sponsors A. Puentes and A. Saenz.	1.00	365.00
02/06/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Binance.US and Block, Inc.	2.00	730.00
02/07/23	STV	Call with R. Ampudia re filing of receivership order in SDFL, prepare notice of filing	0.60	255.00
02/07/23	STV	Review case documents in preparation for interview with CM	2.20	935.00
02/07/23	MKF	Preparation of Receiver's Subpoena for Documents and Demand Letters to several CFX employees and third parties	3.00	1,095.00
02/07/23	MKF	Preparation and organization of documents received in Response to Receiver's Subpoena regarding S. Aguado R. Rodriguez.	2.00	730.00
02/08/23	STV	Analysis of case law re third party claims	1.80	765.00
02/08/23	STV	Revise freeze letter to PLS financial	0.20	85.00
02/08/23	STV	Prepare for and interview former CFX employee CM	4.20	1,785.00
02/08/23	STV	Call with counsel for Ismael Sanchez regarding response to demand letter and documents	0.30	127.50
02/08/23	STV	Call with counsel for Ana and Olegario Munoz regarding subpoena and document requests	0.30	127.50
02/08/23	MKF	Preparation and organization of documents received in Response to Receiver's Subpoena regarding T. Lemus and R. Zavala.	2.00	730.00
02/09/23	MKF	Preparation and organization of documents received in Response to Receiver's Subpoena regarding E. E	1.00	365.00



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Date	Attorney	Description	Hours	Amount
02/10/23	MKF	Preparation and organization of documents received in Response to Receiver's Subpoena regarding Coinbase, Inc.	1.50	547.50
02/10/23	MKF	Preparation Receiver's Subpoena for Documents regarding RingCentral Inc.	1.00	365.00
02/13/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Providence Title Company.	1.00	365.00
02/13/23	MKF	Organization of CFX employees and sales personnel contact information and supporting data.	2.00	730.00
02/14/23	STV	Coordinate filing of receivership order in SDFL	1.10	467.50
02/15/23	STV	Email with G. G. CFX employee re deposition	0.20	85.00
02/15/23	STV	Research and draft motion to expand receivership order	5.40	2,295.00
02/15/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Amrock, Inc.	1.00	365.00
02/16/23	STV	Analysis of case documents on JM Monarchy and prepare affidavit in support of motion to expand receivership	0.70	297.50
02/16/23	STV	Email with counsel for Ana and Olegario Munoz re depositions	0.20	85.00
02/16/23	STV	Review subpoena from Illinois Secretary of State Securities department, confer with team re same	0.50	212.50
02/16/23	STV	Review of third party subpoena and confer with the team re same	0.40	170.00
02/16/23	MKF	Preparation of Receiver's Subpoena for Documents regarding JP Morgan Chase and West Houston VW.	2.00	730.00
02/17/23	STV	Confer with the team re filing of the Receivership order in SDFL	0.30	127.50
02/17/23	MKF	Preparation of CFX Illinois employees data to be submitted in response to the Illinois Secretary of State subpoena.	2.00	730.00
02/20/23	STV	Prepare responses and objections to Chavez's discovery requests	2.80	1,190.00
02/21/23	STV	Analysis of case documents in preparation for CFX employee GG deposition	2.50	1,062.50
02/21/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Styers Realty.	0.50	182.50
02/22/23	MKF	Preparation of Receiver's Subpoena for Documents regarding QTC Holding Corporation, Pathway NA and Independent Financial.	2.00	730.00
02/22/23	STV	Follow up call with G. G. re upcoming deposition	0.30	127.50
02/22/23	STV	Review case documents in preparation for interview with Mr. G. G., CFX employee	2.20	935.00
02/22/23	STV	Call and email with G. Gomez re deposition	0.40	170.00
02/23/23	KKP	Perform update of case law regarding Ponzi scheme definitions and ponzi scheme reports.	3.10	1,317.50



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Date	Attorney	Description	Hours	Amount
02/23/23	MKF	Continued preparation of CFX Illinois employees data to be submitted in response to the Illinois Secretary of State subpoena.	2.00	730.00
02/23/23	STV	Coordinate research on updates on the law on Ponzi scheme cases	0.10	42.50
02/27/23	MKF	Preparation and organization of documents received in Response to Receiver's Subpoena to Bank of America, G. G. and NA	1.00	365.00
02/27/23	MKF	Preparation of Receiver's Subpoena for Documents regarding Zelle.	2.00	730.00
02/28/23	CMG	Research private causes of action under the Banking Secrecy Act.	1.50	637.50
02/28/23	STV	Review research by C. Gieser on third party claims and respond to same	0.30	127.50
03/03/23	MKF	Preparation Receiver's Subpoena for Documents regarding Kraken, Crypto.com, Coinbase Inc., KuCoin and Binance.US.	3.00	1,095.00
03/08/23	MKF	Preparation and organization of case deposition transcripts and exhibits for substantive attorney review.	2.00	730.00
03/09/23	MKF	Preparation documents in Response to Receiver's Subpoena for Documents regarding Styers Realty.	2.00	730.00
03/10/23	MKF	Continued preparation Receiver's Subpoena for Documents regarding Kraken, Crypto.com, Coinbase Inc., KuCoin and Binance.US.	3.00	1,095.00
03/15/23	MKF	Perform searches regarding Capital One Finance.	2.50	912.50
03/16/23	MKF	Preparation of Documents received in Response to Receiver's Subpoena regarding Block, Inc.	1.50	547.50
03/17/23	MKF	Preparation and organization of documents received in Response to Receiver's Subpoena regarding Block, Inc.	2.50	912.50
03/20/23	MKF	Organization of received case correspondence for substantive attorney review.	2.30	839.50
03/21/23	MKF	Preparation and organization of documents received in Response to Receiver's Subpoena regarding M. Chavez, M. Elias and J. Ventura.	3.00	1,095.00
03/23/23	STV	Prepare for and attend hearing on the motion for show cause and confer with the team re same	3.60	1,530.00
03/23/23	STV	Research case law in support of motion to compel	1.90	807.50
03/27/23	MKF	Preparation of documents in Response to Receiver's Subpoena regarding First Community Credit Union and Pathward, N.A.	2.00	730.00
03/29/23	MKF	Perform custodian searches in preparation of document production.	2.00	730.00
03/29/23	STV	Revise notice of filing receivership order in the NDGA and prepare the notice for filing in the District of Massachusetts	1.10	467.50



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Date	Attorney	Description	Hours	Amount
03/29/23	STV	Research and draft motion to compel against Chavez	2.10	892.50
03/30/23	STV	Confer with Massachusetts counsel re filing of notice of receivership	0.20	85.00
03/31/23	MKF	Preparation of documents in Response to Receiver's Subpoena for Documents regarding Zelle.	2.00	730.00
03/31/23	JAW	Attention to review and filing of notice of filing miscellaneous case to provide notice of appointment of receiver in SDNY.	2.50	1,062.50
Subtotal for SEC13 Litigation			230.70	\$90,199.50

SEC16 Valuation

01/03/23	CMG	Attend team call to determine next steps to continue marshaling and protecting assets.	1.50	\$637.50
01/03/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.50	90.00
01/04/23	REF	Exchange e-mails with S. Themeli regarding filings in Central District of California	0.10	42.50
01/04/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.80	144.00
01/05/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.50	90.00
01/05/23	LWP	Provide matter-specific database, document and case team support.	0.70	126.00
01/06/23	CMG	Evaluate evidence of potential money laundering within third party document production.	1.80	765.00
01/06/23	LWP	Provide matter-specific database, document and case team support.	0.50	90.00
01/08/23	LWP	Provide matter-specific database, document and case team support.	1.00	180.00
01/09/23	LWP	Provide matter-specific database, document and case team support.	0.60	108.00
01/10/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.70	126.00
01/11/23	CAU	Correspond with ST regarding CFX witness interviews	0.20	85.00



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Date	Attorney	Description	Hours	Amount
01/12/23	CAU	Develop Spanish script for corresponding with CFX witnesses; correspond with seven Spanish-speaking witnesses to schedule in-person interviews to discuss CryptoFX records; correspond with Receivership team regarding the discussions with the witnesses.	1.80	765.00
01/12/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.50	90.00
01/17/23	ALTZ	Telephone conference with Ms. Themeli regarding retrieving data from Salesforce.	0.20	85.00
01/17/23	ALTZ	Communicate with Ms. Themeli regarding Salesforce issues.	0.10	42.50
01/27/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.50	90.00
02/16/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production to opposing counsel.	0.50	90.00
02/17/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
02/28/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
03/09/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	1.00	180.00
03/17/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
03/21/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
03/27/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00



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Date	Attorney	Description	Hours	Amount
03/29/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from third parties.	0.50	90.00
Subtotal for SEC16 Valuation			16.50	\$4,366.50
Total			797.00	\$323,534.50

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
RAA	Ricardo A. Ampudia	5.80	\$425.00	\$2,465.00
REF	Robert E. Feyder	0.10	425.00	42.50
ALTZ	Arlen L. Tanner	43.90	425.00	18,657.50
STV	Sonila Themeli	368.90	425.00	156,782.50
JAW	Joshua A. Weiner	2.50	425.00	1,062.50
CMG	Caroline M. Gieser	13.40	425.00	5,695.00
KKP	Kierra K. Powell	180.10	425.00	76,542.50
CAU	Cesar A. Udave	21.50	425.00	9,137.50
MKF	Mia K. Fleming	130.80	365.00	47,742.00
ARSV	Alicerose Stiegler	0.10	255.00	25.50
LJG	Leslie J. Gasper	0.70	180.00	126.00
LWP	Levi W. Percy	29.20	180.00	5,256.00
Total Fees		797.00		\$323,534.50

Disbursements

Date	Description	Amount
Expense Code: E102		
01/06/23	Imaging Services - Print Black and White documents (72 @ 0.12)	\$8.64
01/09/23	Imaging Services - Print Black and White documents (1,309 @ 0.12)	157.08
01/10/23	Imaging Services - Print Black and White documents (1,161 @ 0.12)	139.32
01/20/23	Imaging Services - Print Black and White documents (31 @ 0.12)	3.72
01/25/23	Imaging Services - Print Black and White documents (34 @ 0.12)	4.08
01/31/23	Imaging Services - Print Black and White documents (435 @ 0.12)	52.20
02/06/23	Imaging Services - Scan Paper Documents (373 @ 0.10)	37.30
02/07/23	Imaging Services - Print Black and White documents (17 @ 0.12)	2.04
02/07/23	Imaging Services - Print Color Document (373 @ 0.50)	186.50
02/07/23	Imaging Services - Create Thumb Drive - 128 Gig (2 @ 70.00)	140.00
02/07/23	Imaging Services - Print Color Document (73 @ 0.50)	36.50
02/07/23	Imaging Services - Print Black and White documents (300 @ 0.12)	36.00
02/15/23	Imaging Services - Print Black and White documents (18 @ 0.12)	2.16
02/17/23	Imaging Services - Print Color Document (54 @ 0.50)	27.00
03/07/23	Imaging Services - Create Thumb Drive - 128 Gig (2 @ 70.00)	140.00



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Date	Description	Amount
03/16/23	Imaging Services - Print Black and White documents (43 @ 0.12)	5.16
03/16/23	Imaging Services - GBC Binding (1 @ 1.25)	1.25
03/16/23	Imaging Services - Print Black and White documents (224 @ 0.12)	26.88
03/21/23	Imaging Services - Black and White Copies (806 @ 0.12)	96.72
03/31/23	Imaging Services - Black and White Copies (432 @ 0.12)	51.84
03/31/23	Imaging Services - Color Copies (288 @ 0.50)	144.00
Subtotal for	E102	\$1,298.39

Expense Code: E106

Westlaw	\$135.83
Westlaw	42.57
Westlaw	165.02
Pacer	23.80
Westlaw	70.93
Accurint	224.99
Westlaw	8.51
Westlaw	660.07
Westlaw	10.22
Pacer	34.70
Westlaw	20.44
Westlaw	10.22
Westlaw	37.30
Westlaw	39.76
Westlaw	166.00
Westlaw	40.87
Westlaw	165.02
Lexis Legal Research	168.30
Westlaw	8.51
Lexis Legal Research	84.15
Westlaw	10.22
Westlaw	61.30
Westlaw	117.68
Lexis Legal Research	303.45
Westlaw	10.22
Westlaw	24.79
Lexis Legal Research	100.30
Westlaw	495.05
Westlaw	165.02
Westlaw	330.04
Westlaw	8.51



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Date	Description	Amount
	Westlaw	132.82
Subtotal for	E106	\$3,876.61

Expense Code: E107

	Delivery	\$20.56
	Delivery	19.50
	Delivery-UPS	37.88
	Delivery - Federal Express - 771499654196 - from Arlen Tanner, Esq. to Sonila Themeli	37.24
	Delivery - Federal Express	55.34
	Delivery - Federal Express	65.12
Subtotal for	E107	\$235.64

Expense Code: E108

	Special Postage	\$10.20
	Special Postage	8.76
	Special Postage	49.80
	Special Postage	4.44
	Special Postage	9.70
	Special Postage	8.76
	Special Postage	29.88
	Special Postage	11.50
	Special Postage	1.00
	Special Postage	13.05
	Special Postage	8.88
	Special Postage	39.56
	Special Postage	1.26
	Special Postage	6.66
	Special Postage	13.05
	Special Postage	22.50
	Special Postage	86.85
	Special Postage	40.80
	Special Postage	9.65
	Special Postage	29.88
	Special Postage	1.26
	Special Postage	1.26
	Special Postage	164.58
	Special Postage	19.92
	Special Postage	5.70
	Special Postage	31.35
	Special Postage	5.55
03/31/23	Houston Express, Inc - Postage Houston Express, Inc, Outgoing mail delivery to Harris County Clerk's Office	129.00



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Date	Description	Amount
03/31/23	Houston Express, Inc - Postage Houston Express, Inc, Outgoing mail delivery to Harris County Clerk's Office	34.00
Subtotal for	E108	\$798.80
Expense Code: E112		
02/07/23	Montgomery County Clerk, Court Filing Fees, Filing Fees	\$20.00
02/28/23	Commerce Bank, Court Filing Fees, Pay.gov eFiling	49.00
Subtotal for	E112	\$69.00
Expense Code: E113		
01/05/23	Santander Consumer USA Inc., Service of Subpoena, Fee for service of subpoena.	\$25.00
02/16/23	Veritext 20-3132569, Service of Subpoena, on Norma Chavez, 1/23/2023	127.75
02/16/23	Veritext 20-3132569, Service of Subpoena, on Gustavo Gomez, 1/25/2023	204.60
02/16/23	Veritext 20-3132569, Service of Subpoena, on Cindy Mezomo, 1/23/2023	127.75
02/18/23	Veritext 20-3132569, Service of Subpoena, on Ana Munoz, 1/23/2023	127.75
Subtotal for	E113	\$612.85
Expense Code: E115		
02/16/23	Gradillas Court Reporters, Depositions/Transcripts, Oral Deposition of Maria Saravia.	\$1,012.85
02/16/23	Gradillas Court Reporters, Depositions/Transcripts, Oral Deposition of Orlin Turcios.	1,144.40
02/16/23	Gradillas Court Reporters, Depositions/Transcripts, Oral Deposition of Julio Taffinder.	1,594.25
02/16/23	Gradillas Court Reporters, Depositions/Transcripts, Oral Deposition of Carmen De la Cruz.	471.95
02/16/23	Gradillas Court Reporters, Depositions/Transcripts, Oral Deposition of Janette Gonzalez.	1,119.50
Subtotal for	E115	\$5,342.95
Expense Code: E118		
01/27/23	Gulfstream Legal Group LLC, Litigation Support Vendor, Relativity managed services, license, project management and collection. Houston, TX	\$4,014.60
02/20/23	Gulfstream Legal Group LLC, Litigation Support Vendor, Relativity database project management and technical services, in addition to data collection related to Securities and Exchange Commission (SEC) filed a complaint against Mauricio Chavez, Giorgio Benvenuto, CryptoFX, LLC and CBT Group LLC. Houston, TX	2,414.35
Subtotal for	E118	\$6,428.95
Expense Code: E124		
01/27/23	Commerce Bank, Searching & Monitoring, Vehicle search	\$30.00
01/27/23	Commerce Bank, Searching & Monitoring, Vehicle searches	16.13
01/27/23	Commerce Bank, Translation, Translation service	647.60



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Date	Description	Amount
01/27/23	Commerce Bank, Searching & Monitoring, Subscription fee refund	(16.13)
02/09/23	Valerie Muniz Hayes, Payment of Waller County, TX and Hempstead, TX property tax account number R186919; Houston, TX, 10/01/22	1,705.59
02/09/23	Valerie Muniz Hayes, Payment of Waller County, TX and Hempstead, TX property tax account number R186891; Houston, TX, 10/01/22	1,502.59
02/24/23	Legendary Oaks POA, Facilities, POA Maintenance dues for property owned by CBT Group, LLC. Houston, TX	700.00
02/24/23	Commerce Bank, Official Fees, Waller County, TX property tax	44.13
02/24/23	Commerce Bank, Transaction Costs, Service fee for Waller County, TX property tax	1.04
Subtotal for E124		\$4,630.95
Total Disbursements		\$23,294.14
	Current Disbursements	23,294.14
	Total Current Fees and Disbursements	\$346,828.64
	Previous Balance	63,847.86
	Total Amount Due	\$410,676.50

EXHIBIT C

Pugh Accardo, LLC

**1100 Poydras Street
3600 Energy Centre
New Orleans, LA 70163
TEL: 504.799.4500
FAX: 504.799.4520**

Fed Tax ID NO. 26-1774709

March 29, 2023

Sonila Themeli
Shook, Hardy & Bacon L.L.P.
JPMorgan Chase Tower
600 Travis St., Suite 3400
Houston, TX 77002

Client: 17887
Matter: 00001
Invoice #: 64749
Attorney: EGF

RE: Shook, Hardy & Bacon L.L.P.

For Professional Services Rendered Through: February 28, 2023

SERVICES

Date	Person	Description of Services	Hours	Amount
02/02/2023	EGF	L250 Initial study and analysis of the Objection of Microsoft to the Subpoena and preparation of transmittal correspondence to	0.20	70.00
02/28/2023	AJB	L310 Review of Microsoft's objections to the subpoena that was issued to them and research on correct procedural motion to bring in order to compel such discovery	0.50	112.50
Total hours/fees for this matter			0.70	\$182.50

FEE RECAP

Timekeeper	Level	Hours	Rate	Amount
AJB	Brewster, Alexander J	0.50	225.00	\$112.50
EGF	Foundas, Ernest G.	0.20	350.00	\$70.00

Shook, Hardy & Bacon L.L.P. (EGF)
 17887 00001 Receivership Matter (Shook, Hardy & Bacon L.L.P)

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 Inv# 64749

Total Services	\$182.50	
Total Charges and Disbursements	\$0.00	
TOTAL CURRENT CHARGES FOR THIS MATTER		\$182.50

Previous Balance		\$1,666.30
Net Balance Carried Forward		\$1,666.30
<i>Less Prepaid Funds Applied</i>		\$0.00
<i>Less Trust Applied</i>		\$0.00
PLEASE PAY THIS AMOUNT		\$1,848.80

TASK RECAP

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
L250	0.20	\$70.00
L310	0.50	\$112.50
	<u>0.70</u>	<u>\$182.50</u>

PLEASE NOTE INVOICE NUMBER ON YOUR REMITTANCE
THANK YOU

EXHIBIT D

Hays Financial Consulting, LLC

2964 Peachtree Road
 Suite 555
 Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 1/1/2023 to 3/31/2023

April 28, 2023

Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting	7.40	2,042.40
Asset Analysis & Recovery	58.50	15,355.20
Asset Disposition	2.40	722.60
Business Analysis	88.10	17,218.40
Business Operations	1.50	482.80
Case Administration	42.80	14,093.00
Claims Administration & Objections	1.10	398.20
Data Analysis	59.30	16,071.40
Employee Benefits / Pensions	5.70	1,232.60
Fee / Employment Applications & Objection	14.10	NO CHARGE
Forensic Accounting	34.40	10,403.80
Litigation Consulting	60.60	19,993.60
Status Reports	9.50	3,249.80
Tax Issues	5.60	1,545.60
	<u>391.00</u>	<u>\$102,809.40</u>

For professional services rendered

Additional Charges :

Online & Other Research/Reports	258.75
Tax Return Filing Fees	70.00
Total costs	<u>\$328.75</u>

Total amount of this bill

\$103,138.15

Hays Financial Consulting, LLC

2964 Peachtree Road
 Suite 555
 Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 1/1/2023 to 3/31/2023

April 28, 2023

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
Dwaine A. Butler	106.50	18,003.00
	169.04/hr	
James R. Jennings, CPA	1.60	441.60
	276.00/hr	
S. Gregory Hays, CTP, CIRA	127.40	42,136.80
	330.74/hr	
Scott S. Askue	155.50	42,228.00
	271.56/hr	
For professional services rendered	391.00	\$102,809.40
Additional Charges :		
Online & Other Research/Reports		258.75
Tax Return Filing Fees		70.00
Total costs		\$328.75
Total amount of this bill		\$103,138.15

Hays Financial Consulting, LLC

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 1/1/2023 to 3/31/2023

April 28, 2023

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
<u>Accounting</u>				
1/11/2023	SSA	Drafted email to banking representative regarding account ledger.	0.20 276.00/hr	55.20
1/12/2023	SSA	Reviewed report of receivership transactions. Drafted email to the Receiver regarding transfer of funds between accounts.	0.40 276.00/hr	110.40
	SSA	Prepared updated analysis of receiver assets and recoveries through December 2022.	1.30 276.00/hr	358.80
	SSA	Set up and prepared SFAR though December 2022.	2.30 276.00/hr	634.80
1/19/2023	SSA	Reviewed response to email from the Receiver regarding sources and uses of investor funds.	0.40 276.00/hr	110.40
1/30/2023	SSA	Verified monthly allowance payment to Defendant Benvenuto. Drafted email to the Receiver regarding same.	0.20 276.00/hr	55.20
3/2/2023	SSA	Reviewed Angelica Vargas' bank records for sources of funds. Reviewed budget prepared by Mauricio Chavez. Drafted email to Sonila Themeli regarding issues for hearing.	1.10 276.00/hr	303.60
	SSA	Drafted email to Paul Flack regarding wire instructions for return of retainer. Drafted email to Sonila Themeli regarding source of funds.	0.30 276.00/hr	82.80
3/24/2023	SSA	Prepared fee payment allocation among defendant accounts. Drafted emails to and reviewed emails from bank representative and Receiver regarding wire transfers.	0.60 276.00/hr	165.60
3/28/2023	SSA	Prepared template for payment of professional fees from each Defendant account.	0.30 276.00/hr	82.80
3/29/2023	SSA	Prepared updated wire instructions for Receiver's new bank account. Drafted email to closing attorney for Hogan Lane property.	0.30 276.00/hr	82.80
		Subtotal	7.40	2,042.40
<u>Asset Analysis & Recovery</u>				
1/3/2023	SSA	Reviewed appraisal of Waller County property and reviewed purchase documents for same. Drafted email on discrepancy.	1.20 276.00/hr	331.20
1/13/2023	SSA	Reviewed value of holdings at Exodus and updated recovery analysis with same.	0.20 276.00/hr	55.20
1/17/2023	SSA	Researched for information relating to Ebenezer Construction and involvement in Waller County properties.	2.30 276.00/hr	634.80

SEC v CryptoFX

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/20/2023	SSA	Reviewed documents produced by Angelina Vargas and researched for purchase of vehicles.	0.60 276.00/hr 165.60
1/23/2023	SGH	Research regarding the seller of the real property in Waller County for \$2.0 million to CBT Group when current value is \$1.0. Drafted several emails regarding same. Reviewed reports and sale contract and legal description. Research regarding prior owner Odis Styers. Drafted email regarding additional research to Sonila Themeli and Dwaine Butler	1.50 362.00/hr 543.00
	DAB	Discussed issues with Greg Hays regarding sale of property by Odis Styles III. Researched idiCore for agent information. Reviewed and responded to emails from Mr. Hays regarding same. Reviewed county property records for the property and ownership information. Verified ownership of properties.	0.80 170.00/hr 136.00
	SSA	Reviewed for information relating to Waller County real property purchases.	0.10 276.00/hr 27.60
1/27/2023	SGH	Reviewed information regarding Santander and the car loans. Email to Sonila Themeli regarding same.	0.40 362.00/hr 144.80
2/1/2023	SGH	Reviewed documents produced by PLS Financial Services. Researched information and lawsuits against PLS. Reviewed financial information and daily volume of money order purchased in 2021. On some days over \$60K was purchased in Money Order. Drafted email to the Receiver and Sonila Themeli regarding potential issues with PLS and possible claims. Drafted email to James Daniels regarding money order issue.	3.00 362.00/hr 1,086.00
	SSA	Reviewed insurance policy and other issues relating to vehicles. Researched for purchase documents. Prepared analysis of same.	1.60 276.00/hr 441.60
	SSA	Researched for invoices, payments and relating real property issues relating to payments to Ebenezer Construction. Drafted emails to Kierra Powell regarding same.	1.20 276.00/hr 331.20
2/2/2023	SGH	Research in Relativity regarding PLS, Barri and Western Union Money Order. Drafted email to Receiver Team regarding issue and procedures in money order and the issues on check where Payee is not name. There are almost \$1 million in Money Orders with no Payee.	2.00 362.00/hr 724.00
	SGH	Reviewed regarding money order and remittance transfers. Drafted email to Receiver Team regarding same.	0.80 362.00/hr 289.60
	SSA	Reviewed data provided by PLS and formatted for analysis. Prepared summary of transactions.	2.20 276.00/hr 607.20
	DAB	Researched Relativity for money order and transaction detail. Reviewed WhatsApp messages for references to money orders and cashier's check. Continued to review money order receipt detail for transaction information.	1.60 170.00/hr 272.00
2/3/2023	SGH	Additional research regarding Money Orders, PLS, and the replacement vendor after October 2021 when CFX discontinued issuing Money Orders.	0.70 362.00/hr 253.40
	DAB	Reviewed emails from the Receiver and Greg Hays regarding potential claim against PLS. Continued research of money order transactions in Relativity. Discussed issues with Mr. Hays regarding WhatsApp communications regarding money orders.	2.20 170.00/hr 374.00

SEC v CryptoFX

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/6/2023	SSA	3.20 276.00/hr	883.20
2/7/2023	SSA	0.40 276.00/hr	110.40
	DAB	1.10 170.00/hr	187.00
2/8/2023	SSA	0.30 276.00/hr	82.80
	DAB	0.60 170.00/hr	102.00
2/10/2023	DAB	1.40 170.00/hr	238.00
	SSA	0.70 276.00/hr	193.20
2/14/2023	SSA	2.60 276.00/hr	717.60
	DAB	0.80 170.00/hr	136.00
2/16/2023	DAB	0.60 170.00/hr	102.00
2/20/2023	SGH	0.40 362.00/hr	144.80
	DAB	0.70 170.00/hr	119.00
2/21/2023	SSA	2.60 276.00/hr	717.60
2/23/2023	SSA	5.10 276.00/hr	1,407.60
2/27/2023	DAB	0.90 170.00/hr	153.00
2/28/2023	SSA	2.10 276.00/hr	579.60
	DAB	0.80 170.00/hr	136.00
	SSA	0.40 276.00/hr	110.40
3/1/2023	DAB	1.30 170.00/hr	221.00
3/2/2023	SSA	5.30 276.00/hr	1,462.80

SEC v CryptoFX

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/21/2023	DAB	1.80 170.00/hr	306.00
3/29/2023	SSA	1.20 276.00/hr	331.20
3/31/2023	SSA	1.80 276.00/hr	496.80
	Subtotal	58.50	15,355.20

Asset Disposition

1/13/2023	SSA	0.20 276.00/hr	55.20
1/16/2023	SSA	0.30 276.00/hr	82.80
1/23/2023	SGH	0.70 362.00/hr	253.40
2/10/2023	SSA	0.30 276.00/hr	82.80
2/16/2023	SSA	0.20 276.00/hr	55.20
3/29/2023	SSA	0.70 276.00/hr	193.20
	Subtotal	2.40	722.60

Business Analysis

1/3/2023	DAB	0.70 170.00/hr	119.00
1/4/2023	DAB	1.70 170.00/hr	289.00
1/5/2023	DAB	1.40 170.00/hr	238.00
1/6/2023	DAB	1.80 170.00/hr	306.00
	SSA	0.40 276.00/hr	110.40
1/9/2023	DAB	2.40 170.00/hr	408.00

SEC v CryptoFX

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		<u>Hrs/Rate</u>	<u>Amount</u>
	Sonila Themeli regarding verification of leader and employee information. Identified Chicago leaders and input information.		
1/10/2023	DAB Discussed issues with Greg Hays and Scott Askue regarding recovery of leader addresses and research of same. Reviewed Relativity for emails regarding bonus and commission detail. Continued to input information into leader database. Telephone calls to and from Sonila Themeli regarding research efforts and additions to leader list.	2.40 170.00/hr	408.00
1/11/2023	DAB Continued to input leader information into spreadsheet report. Researched for current leader addresses, phone numbers, and social security information. Telephone call from Sonila Themeli regarding additional leader list and input of new of new information. Reviewed and responded to emails from Greg Hays and Mrs. Themeli regarding same.	2.80 170.00/hr	476.00
	DAB Continued to update leader information report in preparation of mailing to sponsors.	1.20 170.00/hr	204.00
	SGH Review and edit the analysis of all the leaders. Discuss the new information with Dwaine Butler and updated to the leader analysis. Call from Sonila Themeli regarding sending the demand letters to the Sales Agents / Leaders.	0.80 362.00/hr	289.60
1/12/2023	SGH Reviewed new information regarding the leaders and discussed with Dwaine Butler. Updated the leader list.	0.30 362.00/hr	108.60
	DAB Continued to research updated contact information for sponsors. Updated chart of known sales agents. Reviewed email from Mr. Hays regarding new list of potential leaders. Reviewed current roster of leaders and compared to new document listing.	2.50 170.00/hr	425.00
1/13/2023	DAB Continued to research missing addresses and contact information of verified leaders. Discussed issues with Greg Hays regarding specific leader detail and review of email addresses. Reviewed IdiCore for additional research efforts.	1.60 170.00/hr	272.00
1/16/2023	DAB Updated leaders/sponsors list with current addresses from research reports. Drafted emails to and reviewed emails from Greg Hays and Sonila Themeli regarding same.	2.00 170.00/hr	340.00
1/17/2023	DAB Reviewed email from Sonila Themeli regarding sponsor demand letter and distribution of same. Reviewed updated sponsor list and continued to research address and location of 14 verified sponsors.	1.50 170.00/hr	255.00
1/18/2023	DAB Reviewed email from Sonila Themeli regarding draft demand letter to CFX sponsors. Reviewed letter. Reviewed current leader list for the determination of missing leader information. Continued to research idiCore for specific sponsor contact information.	0.80 170.00/hr	136.00
1/20/2023	SGH Reviewed analysis of daily activity and considered new analysis of outstanding principal for contracts in last six months.	0.50 362.00/hr	181.00
1/24/2023	SSA Reviewed for backup and support documents relating to leader transactions.	2.40 276.00/hr	662.40
1/25/2023	SGH Reviewed information on commissions paid to leaders and Chicago operations with no investments in BTC.	0.40 362.00/hr	144.80
	DAB Continued to research relativity for missing sponsor contact information. Compared to updated leader list and updated two contacts with email addresses.	1.30 170.00/hr	221.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/26/2023	DAB	0.80 170.00/hr	136.00
1/30/2023	DAB	2.20 170.00/hr	374.00
1/31/2023	DAB	0.40 170.00/hr	68.00
2/1/2023	DAB	1.60 170.00/hr	272.00
2/2/2023	SGH	0.80 362.00/hr	289.60
	DAB	0.70 170.00/hr	119.00
2/3/2023	DAB	0.30 170.00/hr	51.00
2/7/2023	DAB	1.80 170.00/hr	306.00
	DAB	0.20 170.00/hr	34.00
2/8/2023	DAB	0.60 170.00/hr	102.00
2/9/2023	DAB	2.30 170.00/hr	391.00
	SSA	1.60 276.00/hr	441.60
2/10/2023	SSA	2.20 276.00/hr	607.20
2/13/2023	DAB	1.80 170.00/hr	306.00
2/14/2023	DAB	1.20 170.00/hr	204.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/15/2023	SGH	0.80	289.60
		362.00/hr	
	DAB	0.60	102.00
		170.00/hr	
2/16/2023	SGH	0.40	144.80
		362.00/hr	
	DAB	1.80	306.00
		170.00/hr	
2/17/2023	DAB	0.70	119.00
		170.00/hr	
	SSA	0.60	165.60
		276.00/hr	
2/21/2023	DAB	0.80	136.00
		170.00/hr	
2/22/2023	DAB	1.80	306.00
		170.00/hr	
2/23/2023	DAB	1.60	272.00
		170.00/hr	
3/2/2023	DAB	0.80	136.00
		170.00/hr	
3/8/2023	DAB	1.20	204.00
		170.00/hr	
3/9/2023	DAB	0.80	136.00
		170.00/hr	
3/13/2023	DAB	0.80	136.00
		170.00/hr	
3/14/2023	DAB	0.20	34.00
		170.00/hr	
3/15/2023	DAB	0.80	136.00
		170.00/hr	

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/16/2023	DAB	1.60 170.00/hr	272.00
3/20/2023	DAB	1.80 170.00/hr	306.00
3/21/2023	SSA	1.80 276.00/hr	496.80
3/22/2023	DAB	1.70 170.00/hr	289.00
3/23/2023	DAB	1.80 170.00/hr	306.00
	SSA	2.20 276.00/hr	607.20
3/24/2023	DAB	2.40 170.00/hr	408.00
3/27/2023	SSA	0.20 276.00/hr	55.20
	DAB	2.80 170.00/hr	476.00
3/28/2023	DAB	1.80 170.00/hr	306.00
	DAB	3.30 170.00/hr	561.00
3/29/2023	DAB	1.80 170.00/hr	306.00
	DAB	0.70 170.00/hr	119.00
3/30/2023	SSA	2.20 276.00/hr	607.20
	DAB	0.60 170.00/hr	102.00
3/31/2023	SSA	0.30 276.00/hr	82.80

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		<u>Hrs/Rate</u>	<u>Amount</u>
	Subtotal	88.10	17,218.40
<u>Business Operations</u>			
1/6/2023	SGH Reviewed information regarding the Chicago leaders and on-going fraud in that market. Drafted email to Dwaine Butler regarding same and updated the leaders schedule.	0.40 362.00/hr	144.80
2/3/2023	SGH Reviewed email regarding Ring Central phone numbers and on-going fraud. Reviewed communications to investors.	0.40 362.00/hr	144.80
	SSA Reviewed and responded to email from the Receiver regarding continuing operations of the Defendants.	0.30 276.00/hr	82.80
	SSA Reviewed for contact information for telephone service in Defendant records. Drafted email to Valerie Hays regarding same.	0.40 276.00/hr	110.40
	Subtotal	1.50	482.80
<u>Case Administration</u>			
1/3/2023	SSA Receiver team meeting regarding various case matters and recoveries.	1.40 276.00/hr	386.40
	SGH Participated in the weekly Receiver team conference call to discuss plans for the week and pending matters including action against sales agents, motion to expand receivership and other issues.	1.40 362.00/hr	506.80
	SGH Reviewed issues regarding the Receiver's web site and drafted email to Lisa Fern regarding updates to the website to keep investor informed.	0.40 362.00/hr	144.80
	SGH Organized documents from recent filings and prepared project list of issue to research.	1.20 362.00/hr	434.40
1/6/2023	SGH Reviewed updated files in Kiteworks that included recording from calls from investors. Drafted email to Sonila Themeli regarding the call from the police department in Illinois. Corresponded with Sonila Themeli regarding updated message to investor and directing them to the website.	0.80 362.00/hr	289.60
	SGH Corresponded with Lisa Fern regarding updates to Receiver's web site.	0.30 362.00/hr	108.60
1/13/2023	SSA Reviewed and responded email from the Receiver and Sonila Themeli regarding requests from Mr. Chavez and websites update.	0.30 276.00/hr	82.80
1/17/2023	SGH Participated in the weekly Receiver Team Zoom conference call. Discussed issues including recovery from sales agents, motion to expand receivership, asset sales, website updates, Salesforce data, document depository, discovery, Ponzi report.	1.40 362.00/hr	506.80
	SGH Reviewed and edited the Receiver's Plan of Liquidation. Email regarding same.	0.50 362.00/hr	181.00
	SSA Telephone conference with Receiver Team regarding sales agents claims, motion to expand receivership, asset sales, Salesforce data and other issues.	1.40 276.00/hr	386.40
1/19/2023	SGH Reviewed and made recommendations for updates to website. Corresponded with Lisa Fern.	0.30 362.00/hr	108.60
	SGH Reviewed and responded to emails on wide variety of issues including recovery of cars, sale of real estate, sales agents, on-going fraud in Chicago, subpoenas, and other matters.	1.30 362.00/hr	470.60

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		<u>Hrs/Rate</u>	<u>Amount</u>	
1/19/2023	SSA	Reviewed and responded to email from Sonila Themeli regarding information for liquidation plan.	0.30 276.00/hr	82.80
1/20/2023	SGH	Reviewed docket activity and Plan filed. Reviewed issues regarding website. Drafted email regarding claims on website.	0.40 362.00/hr	144.80
1/23/2023	SGH	Weekly conference call with Sonila Themeli, Scott Askue, and Kierra Powell regarding pending matters including: next report due 1/30/23, Salesforce, sale of real property, liquidation of BTC, report form Blocktrace, recovery from sales agents, recovery of computer, etc.	1.20 362.00/hr	434.40
	SGH	Reviewed email regarding invoice from Frank Sodetz for Chicago work and email to Sonila Themeli regarding payment of invoice.	0.20 362.00/hr	72.40
	SSA	Weekly conference call with receiver team regarding pending matters.	1.20 276.00/hr	331.20
1/24/2023	SGH	Reviewed issues regarding information on website and email to update the website for investor communications. Tested new additions to website.	0.30 362.00/hr	108.60
	SGH	Reviewed and responded to wide variety of emails on asset sale, news, Chavez money request, and other issues. Research issues regarding objection to Defendant's fund request. Corresponded with Receiver and Sonila Themeli regarding same.	0.70 362.00/hr	253.40
	SSA	Reviewed blog posts relating to investor issues. Drafted email to the Receiver regarding same.	0.30 276.00/hr	82.80
1/25/2023	SGH	Reviewed and responded to emails. Sent email to update the website.	0.40 362.00/hr	144.80
	SGH	Researched issues regarding the use of investor funds to pay Chavez's legal fees. Researched prior cases and for information regarding objections to use investors funds to pay Defendant's legal fees.	0.80 362.00/hr	289.60
1/26/2023	SGH	Researched and drafted email to Receiver and Sonila Themeli regarding Defendant's use of investor funds to pay legal fees. Reviewed pleadings in several case and picked highlights to send to Sonila Themeli for response to Flack's request for legal fees.	1.20 362.00/hr	434.40
1/27/2023	SGH	Reviewed and responded to emails from Sonila Themeli and the Receiver regarding wide variety of issues.	0.80 362.00/hr	289.60
	SGH	Researched information regarding Motion to Expand the Receivership to include asset and sales agents. Sent several emails to Sonila Themeli regarding the Motion to Expand the Receivership.	0.80 362.00/hr	289.60
	SGH	Reviewed filed motion and downloaded for posting to the Receiver's website.	0.20 362.00/hr	72.40
1/30/2023	SSA	Weekly team meeting with Receiver and Receiver Team regarding case matters, recoveries, depositions and upcoming issues.	1.20 276.00/hr	331.20
	SGH	Participated in the weekly receiver team conference call. Discussed issues regarding Blocktrace crypto trading report, sale of assets, motion to expand receivership, First Quarterly report and many other issues for this week.	1.20 362.00/hr	434.40
1/31/2023	SGH	Drafted email to Frank Soetz in Chicago. Drafted emails to Blocktrace representatives. Followed-up on pending matters.	0.40 362.00/hr	144.80
2/3/2023	SGH	Reviewed and edited letter regarding legal fees and Chavez expenses. Corresponded with counsel regarding same.	0.30 362.00/hr	108.60

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		<u>Hrs/Rate</u>	<u>Amount</u>	
2/3/2023	SSA	Reviewed and verified content of letter to judge regarding attorney fees.	0.30 276.00/hr	82.80
2/6/2023	SGH	Participated in the weekly receiver team conference call and discussed pending matters and plans for the week.	1.40 362.00/hr	506.80
2/9/2023	SGH	Reviewed and responded to email on wide variety of issues after being out of the office for a week.	1.50 362.00/hr	543.00
	SGH	Participated in Zoom call with investors in Los Angeles.	1.20 362.00/hr	434.40
2/13/2023	SSA	Weekly strategy regarding conference call with Receiver and receiver team.	1.80 276.00/hr	496.80
	SGH	Discussion with Scott Askue regarding the Receiver team conference call and pending matters.	0.20 362.00/hr	72.40
2/14/2023	SGH	Review and draft email to Sonila Themeli regarding motion to expand receivership.	0.40 362.00/hr	144.80
2/16/2023	SGH	Telephone call from the Receiver regarding pending matters and administrative issues.	0.30 362.00/hr	108.60
	SGH	Researched issues regarding reappointment of Receiver under Section 724 and drafted email to Sonila Themeli regarding same.	0.40 362.00/hr	144.80
2/17/2023	SGH	Researched issues regarding the fee cap in other SEC cases and email to Receiver and Sonila Themeli regarding the 60 day fee cap and implied waiver.	0.60 362.00/hr	217.20
2/20/2023	SGH	Participated in the weekly Receiver Team Zoom call to discuss pending duties and assignment. Discussed PLS complain, Salesforce data, Ponzi Expert report, sale agents, etc.	1.00 362.00/hr	362.00
	SGH	Reviewed email and issues regarding research requested by the Receiver of the on-going fraud.	0.20 362.00/hr	72.40
	SSA	Video conference with Receiver and Receiver team regarding action items and status of pending matters.	1.00 276.00/hr	276.00
2/24/2023	SGH	Reviewed receiver procedures motion and drafted email to Sonila Themeli and Receiver regarding the procedures motion to simplify certain filing issues.	0.40 362.00/hr	144.80
2/27/2023	SSA	Telephone conference with Receiver Team regarding case strategy and upcoming matters.	1.10 276.00/hr	303.60
	SGH	Participated in the weekly conference call on issues to be pursued this week. Discusses all pending matters and possible litigation and research.	1.10 362.00/hr	398.20
3/6/2023	SSA	Receiver team meeting about potential litigation and other case matters.	1.10 276.00/hr	303.60
	DAB	Discussed issues with Greg Hays regarding current case issues, research of Metadex transactions, and Relativity research. Weekly status call with John Lewis and Scott Askue.	0.80 170.00/hr	136.00
3/13/2023	SSA	Weekly team meeting with Receiver and team.	0.30 276.00/hr	82.80
	SSA	Updated Motion to invest receivership funds with information regarding recoveries to date. Updated Receiver's recovery report with same.	0.60 276.00/hr	165.60
3/20/2023	SGH	Participated in the weekly Receiver Team conference call. Reviewed pending matters.	1.50 362.00/hr	543.00
	SSA	Weekly meeting with receiver and team.	1.50 276.00/hr	414.00
3/21/2023	SGH	Reviewed draft of response to Flack's fees and email regarding same.	0.30 362.00/hr	108.60
3/27/2023	SGH	Participated in the weekly receiver team call.	0.50 362.00/hr	181.00
	SSA	Weekly team meeting with Receiver and team.	0.50 276.00/hr	138.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2023	SSA Researched for personal identification for Mauricio Chavez. Drafted email to Kierra Powell regarding same.	0.20 276.00/hr	55.20
	Subtotal	42.80	14,093.00
<u>Claims Administration & Objections</u>			
1/19/2023	SGH Reviewed issues for claims administration process and made recommendations regarding use of the website and data when we receive from Salesforce.	0.40 362.00/hr	144.80
2/17/2023	SGH Reviewed the chart of sales agents and letter to the sales agents. Discussed the Salesforce database with Scott Askue and plans to use the data to establish a claims process.	0.70 362.00/hr	253.40
	Subtotal	1.10	398.20
<u>Data Analysis</u>			
1/3/2023	SSA Reviewed additional documents produced by Rapp and Krock.	1.60 276.00/hr	441.60
	SSA Reviewed and responded to email from Sonila Themeli regarding review and download of data from employee and leader accounts.	0.20 276.00/hr	55.20
1/5/2023	SSA Reviewed documents produced by Janette Gonzalez.	1.60 276.00/hr	441.60
1/12/2023	SGH Reviewed emails from Receiver Team regarding new documents produced in Kiteworks, Salesforce data, and other matters.	0.40 362.00/hr	144.80
	SSA Telephone call with SalesForce regarding access to data. Drafted email regarding same.	0.50 276.00/hr	138.00
1/19/2023	DAB Researched Relativity for information on Chavez' Apple Mini-Mac computer.	1.30 170.00/hr	221.00
1/20/2023	DAB Reviewed and researched purchased computer inventory list and verified. Drafted updated list of computers for the determination of company purchased IT equipment and Apple Mini Mac computer purchase.	0.80 170.00/hr	136.00
1/23/2023	SSA Reviewed investor report from Gloria Castaneda. Drafted email to Sonila Themeli regarding initial comments.	1.10 276.00/hr	303.60
1/24/2023	DAB Reviewed Relativity and researched information technology inventory purchases. Reviewed several invoice and receipts for the determination of company owned devices. Continued to review documentation and WhatsApp communications from Relativity database.	1.20 170.00/hr	204.00
	SSA Reviewed and replied to email from Sonila Themeli regarding review of Salesforce data.	0.20 276.00/hr	55.20
1/25/2023	SSA Reviewed leader data provided by Gloria Castaneda. Prepared analysis of same and summary of distribution of funds received.	2.90 276.00/hr	800.40
1/26/2023	DAB Continued to research Relativity database for company purchased computers. Updated schedule of computers and drafted inventory summary to Greg Hays and Scott Askue. Verified purchase of six additional business computers and continued researched of Chavez Apple Mac Mini computer. Researched Relativity for Adam Security invoices and	2.80 170.00/hr	476.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		documentation. Printed invoices and drafted email to Receiver's counsel regarding potential contact information.		
1/27/2023	SGH	Reviewed new documents produced in Kiteworks.	0.90	325.80
			362.00/hr	
2/1/2023	SSA	Reviewed and provided initial comments on leader report provided by Elizabeth Escoto.	0.30	82.80
			276.00/hr	
	SSA	Reviewed documents provided by PRWCSWTX and drafted mails regarding tracing of crypto payments and analysis of same. Reviewed defendants' records regarding same.	2.20	607.20
			276.00/hr	
2/2/2023	SSA	Reviewed report provided by Roberto Zavala and drafted comments on findings.	1.50	414.00
			276.00/hr	
2/3/2023	SSA	Formatted Salesforce extracted data for further analysis. Studied various reports for recreation of data in additional format.	4.50	1,242.00
			276.00/hr	
2/6/2023	DAB	Reviewed and responded to email from Sonila Themeli regarding research of RingCentral phone numbers for identification of additional insiders. Reviewed idiCore reverse phone directory for information. Reviewed Relativity for data consisting of RingCentral phone numbers.	2.40	408.00
			170.00/hr	
	SSA	Reviewed and emailed Sonila Themeli and Arlen Tanner regarding Salesforce data and processing of same.	0.40	110.40
			276.00/hr	
2/7/2023	SSA	Set up and accessed Salesforce account. Reviewed available data. Prepared report of investor data. Video Conference with Levi Percy, Arlen Tanner and Sonila Themeli regarding extraction of data, creation of database and other issues with the data.	3.40	938.40
			276.00/hr	
2/15/2023	SSA	Reviewed and prepared reports from Salesforce. Compared report results to paper statements and leader documents. Exported data and compared to extracted .csv data.	4.30	1,186.80
			276.00/hr	
2/16/2023	SSA	Designed and prepared reports of investor earnings, bonus and commission reports in Salesforce by year. Tested data for completeness against paper investment contracts and spreadsheets. Drafted email to Arlen Tanner regarding same. Compared individual investor	5.30	1,462.80
			276.00/hr	
2/17/2023	SGH	Reviewed new documents uploaded in Kiteworks.	0.60	217.20
			362.00/hr	
	SSA	Drafted emails to and reviewed emails from Arlen Tanner regarding restrictions in Salesforce access. Formatted and combined exported Salesforce csv raw data for creation of database.	3.80	1,048.80
			276.00/hr	
2/21/2023	SGH	Reviewed data of 35,000 investors from Salesforce. Discussed issues in the data with Scott Askue. Reviewed email regarding the Illinois data for production	0.50	181.00
			362.00/hr	
2/27/2023	SSA	Reviewed productions from JP Morgan, Bank of America and others. Prepared notes and documents of interest.	1.30	358.80
			276.00/hr	
3/2/2023	SSA	Drafted email to and reviewed emails from Sonila Themeli regarding Salesforce data and use of same. Reviewed issues and testing of same.	0.40	110.40
			276.00/hr	
3/7/2023	SSA	Drafted email to Sonila Themeli regarding review of Salesforce data.	0.30	82.80
			276.00/hr	
3/10/2023	SSA	Downloaded, restore and reviewed reports from Salesforce.	1.20	331.20
			276.00/hr	

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/21/2023	SGH	1.10 362.00/hr	398.20
	SGH	0.60 362.00/hr	217.20
3/28/2023	SGH	0.70 362.00/hr	253.40
	SSA	0.60 276.00/hr	165.60
3/30/2023	SGH	0.90 362.00/hr	325.80
	SGH	1.10 362.00/hr	398.20
3/31/2023	SGH	0.70 362.00/hr	253.40
	SGH	2.50 362.00/hr	905.00
	DAB	2.40 170.00/hr	408.00
	SSA	0.60 276.00/hr	165.60
	SSA	0.20 276.00/hr	55.20
	Subtotal	59.30	16,071.40

Employee Benefits / Pensions

1/12/2023	SSA	1.40 276.00/hr	386.40
	DAB	0.30 170.00/hr	51.00
1/19/2023	DAB	0.50 170.00/hr	85.00
1/25/2023	DAB	0.40 170.00/hr	68.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/27/2023	SGH	0.60 362.00/hr	217.20
	DAB	1.20 170.00/hr	204.00
2/1/2023	DAB	0.20 170.00/hr	34.00
2/3/2023	DAB	0.30 170.00/hr	51.00
2/7/2023	DAB	0.20 170.00/hr	34.00
2/8/2023	DAB	0.60 170.00/hr	102.00
	Subtotal	5.70	1,232.60

Fee / Employment Applications & Objection

1/3/2023	SGH	0.80 362.00/hr	NO CHARGE
1/9/2023	SSA	1.20 276.00/hr	NO CHARGE
1/10/2023	SGH	1.00 362.00/hr	NO CHARGE
1/11/2023	SGH	2.00 362.00/hr	NO CHARGE
1/12/2023	SGH	0.60 362.00/hr	NO CHARGE
	SSA	0.80 276.00/hr	NO CHARGE
1/13/2023	SGH	0.70 362.00/hr	NO CHARGE
1/17/2023	SGH	0.50 362.00/hr	NO CHARGE
	SGH	0.40 362.00/hr	NO CHARGE
1/19/2023	SGH	0.40 362.00/hr	NO CHARGE

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2023	SGH	Reviewed draft of the fee application and provided comments.	0.30 362.00/hr	NO CHARGE
	SSA	Reviewed fee application.	0.50 276.00/hr	NO CHARGE
2/21/2023	SGH	Reviewed and edited fee order. Drafted email to Receiver and Sonila Themeli regarding draft of order and issues for concern. Researched additional language regarding fee cap imposed by SEC for 60 days on this estimated \$400 million Ponzi scheme.	1.20 362.00/hr	NO CHARGE
	SGH	Additional review and analysis of total fees for the fee application. Calculated blended hourly rate for Receiver Team for fee application and drafted email regarding same. Verified figures. Drafted email to Sonila Themeli and Receiver. Additional analysis regarding the fee cap and holdback.	1.90 362.00/hr	NO CHARGE
2/22/2023	SGH	Review and analysis in connection with the first fee application. Updated analysis of fee. Call to Sonila Themeli regarding the fee application. Edited the drafts of the application and order regarding the 60 Day fee cap and holdback issues.	1.20 362.00/hr	NO CHARGE
2/23/2023	DAB	Reviewed Receiver's Interim Fee Application. Discussed issue with Greg Hays regarding preparation of second fee application.	0.40 170.00/hr	NO CHARGE
3/20/2023	DAB	Reviewed idiCore invoice and confirmed billing to include in Fee Application.	0.20 170.00/hr	NO CHARGE
		Subtotal	14.10	0.00

Forensic Accounting

1/5/2023	SGH	Conference call with James Daniels, Kevin Duberstein of Blocktrace and Scott Askue. Discussed plans for forensic accounting analysis of the Coinbase data and tracing the crypto currencies purchased.	0.80 362.00/hr	289.60
	SGH	Reviewed crypto search terms. Researched information in Relativity on the search terms provided by BlockTrace. Corresponded with Levy Percy regarding the search terms and set up search. Reviewed data regarding National Bitcoin ATM and drafted email regarding same. Continued to research data of various crypto currencies to locate the data to trace the funds. Uploaded documents to a Box share file secure account to share with James Daniels and Kevin Duberstein.	3.50 362.00/hr	1,267.00
	SSA	Telephone call to with James Daniel and Kevin Duberstein of Blocktrace regarding review of crypto transactions. Drafted email to Sonila Themeli regarding engagement of same. Reviewed for available crypto records.	1.50 276.00/hr	414.00
1/6/2023	SGH	Updated document to the BOX share filed for BlockTrace to investigate the crypto transactions. Reviewed document provided by SEC and others and posted to the website. Drafted email to Scott Askue regarding index to SEC production. Continued to review crypto documents and researched Relativity.	2.50 362.00/hr	905.00
	SSA	Drafted emails to Blocktrace and responded to email from same regarding issues for engagement. Edited and commented on engagement agreement.	0.50 276.00/hr	138.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/9/2023	SGH	Reviewed new information uploaded for any crypto data. Corresponded with Crypto investigators at BlockTrace.	5.00 362.00/hr	1,810.00
1/12/2023	SSA	Gathered data relating to additional crypto transactions and updated for review. Drafted email to James Daniel and Kevin Duberstein regarding same.	0.70 276.00/hr	193.20
1/17/2023	SGH	Conference call with James Daniels, Kevin Duberstein, and Scott Askue crypto currency issues and liquidation of account and trading profits from the Coinbase account. Drafted email to James Daniels and Kevin Duberstein regarding crypto matters and reported profits.	0.60 362.00/hr	217.20
	SSA	Conference call with James Daniels, Kevin Duberstein of BlockTrace and Greg Hays regarding analysis of accounts and other crypto issues.	0.50 276.00/hr	138.00
1/20/2023	SGH	Researching issues regarding cryptocurrency trading.	0.60 362.00/hr	217.20
	DAB	Reviewed report form Blocktrace on Crypto tracing. Searched Relativity for two wallets mentioned. Drafted email to James Daniels, Kevin Duberstein and Scott Askue regarding same.	0.60 170.00/hr	102.00
1/23/2023	SGH	Review and analysis in response to James Daniels email regarding Coinbase. Drafted several email to James Daniels.	0.90 362.00/hr	325.80
1/24/2023	SSA	Analyzed issues relating to value of Julio Taffinder's wallet as of 12/31/22.	0.40 276.00/hr	110.40
1/30/2023	SSA	Performed initial review of BlockTrace analysis of crypto trading by CryptoFX.	0.70 276.00/hr	193.20
1/31/2023	SSA	Completed review of report prepared by Blocktrace. Drafted email to same regarding various issues.	1.10 276.00/hr	303.60
2/2/2023	SGH	Microsoft Teams conference with Kevin Duberstein and Scott Askue regarding Binance and SquareUp crypto wallets. Email to Sonila Themeli regarding same.	0.50 362.00/hr	181.00
	SSA	Conference call with Blocktrace regarding crypto transactions.	0.30 276.00/hr	82.80
2/10/2023	SGH	Reviewed and responded to emails regarding crypto transaction with Kevin Duberstein and Scott Askue (.4). Emails to Sonila Themeli regarding crypto and other pending matters (.3).	0.70 362.00/hr	253.40
2/15/2023	SSA	Drafted email to Kevin Duberstein regarding Binance transactions.	0.20 276.00/hr	55.20
2/22/2023	SSA	Drafted email to Kevin Duberstein of Blocktrace regarding transfer to Nano Ledger and access to same.	0.30 276.00/hr	82.80
2/24/2023	SGH	Reviewed information regarding Binance, Metadex and Safe Pal. Corresponded with Kevin Duberstein regarding same and funds from Coinbase to Binance.	0.60 362.00/hr	217.20
	DAB	Researched Binance, Metadex, and SafePal for the determination of additional assets and transactions. Reviewed and responded to emails from Greg Hays regarding same.	1.20 170.00/hr	204.00
	SSA	Reviewed and uploaded data to shared drive and drafted email to Blocktrace regarding Binance response.	0.50 276.00/hr	138.00
2/27/2023	SSA	Reviewed for crypto transactions with Gustavo Gomez. Drafted email to BlockTrace regarding same.	0.60 276.00/hr	165.60
	DAB	Reviewed email from Greg Hays regarding Binance and Metadex transaction research. Reviewed Relativity for information regarding tracking of payments via SafePal and Binance.	0.90 170.00/hr	153.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2023	SSA	0.40	110.40
		276.00/hr	
3/7/2023	SSA	1.90	524.40
		276.00/hr	
	DAB	0.80	136.00
		170.00/hr	
3/21/2023	SSA	1.50	414.00
		276.00/hr	
3/28/2023	SGH	0.50	181.00
		362.00/hr	
3/30/2023	SGH	1.40	506.80
		362.00/hr	
	DAB	2.20	374.00
		170.00/hr	
	Subtotal	34.40	10,403.80

Litigation Consulting

1/3/2023	SGH	0.40	144.80
		362.00/hr	
	SGH	0.50	181.00
		362.00/hr	
1/4/2023	SGH	0.40	144.80
		362.00/hr	
1/5/2023	SSA	1.50	414.00
		276.00/hr	
1/6/2023	SGH	2.50	905.00
		362.00/hr	
	SSA	4.20	1,159.20
		276.00/hr	
1/10/2023	SGH	0.30	108.60
		362.00/hr	
1/12/2023	SGH	2.50	905.00
		362.00/hr	

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			<u>Hrs/Rate</u>	<u>Amount</u>
		objections and procedures given the tens of thousands of pages of documents as discussed in the Receiver's First Interim Report.		
1/13/2023	SGH	Updated the graphs of total sales activity of over \$300 million and the post TRO activity. Drafted email to Kierra Powell, Sonila Themeli and Receiver regarding same.	0.60 362.00/hr	217.20
1/16/2023	SGH	Drafted the Ponzi Scheme expert report. Reviewed case law and reviewed and organized document to attach to the report. Drafted language regarding the Ponzi presumption and funds in bank account at time of receiver's appointment. Reviewed complaint and Carol Hand Declaration and added information regarding the crypto trading profits of \$1.5 million and compared to total funds raised. Began organizing supporting documents. Spent all day on this matter on holiday without interruption.	6.00 362.00/hr	2,172.00
	SSA	Reviewed case documents for interview of Ana Munoz.	3.80 276.00/hr	1,048.80
1/17/2023	SGH	Reviewed issues regarding Defendants request for access to all documents and drafted email to Sonila Themeli regarding same.	0.40 362.00/hr	144.80
	SGH	Updated the draft of the Ponzi report. Added language on crypto to the Ponzi report.	0.80 362.00/hr	289.60
	SGH	Reviewed Response to Receiver's Motion to Show Cause. Considered issues to address in the Ponzi report.	0.60 362.00/hr	217.20
	SGH	Updated the Ponzi report with quotes regarding the office management from the Response to Receiver's Motion to Show Cause.	1.20 362.00/hr	434.40
	SSA	Compiled documents for interview of Ana Munoz. Drafted email to Sonila Themeli regarding same.	2.60 276.00/hr	717.60
1/18/2023	SGH	Spent the entire day working and updating the Ponzi scheme expert report reviewed the Hahn declaration and added information. Reviewed the Flack response and added information regarding the business operation.	7.00 362.00/hr	2,534.00
	SGH	Reviewed and responded to Sonila Themeli regarding Receiver's Reply Brief to the Response filed by Flack to Motion to Show Cause. Considered issues and drafted response.	0.80 362.00/hr	289.60
1/19/2023	SGH	Review and analysis of the outstanding obligations of CFX given the terms of the contract. Reviewed and discussed issues with Scott Askue. Reviewed analysis of daily investments and considered format for analysis for Ponzi report.	2.00 362.00/hr	724.00
1/26/2023	SGH	Reviewed draft of Motion to Show Cause and provided comments regarding computers CFX acquired and waiver of privilege to obtain Chavez computer.	0.80 362.00/hr	289.60
1/27/2023	SGH	Reviewed and researched additional information for response to Chavez regarding Motion to Show Cause. Provided edits regarding waiver of privilege.	0.40 362.00/hr	144.80
1/30/2023	SGH	Reviewed the BlockTrace report on crypto trading and considered issues for the Ponzi report. Drafted language for quarterly report.	0.60 362.00/hr	217.20
1/31/2023	SGH	Reviewed and consider plans to pursue the sales agents. Researched the Stanford case and the litigation against the 300 advisors that were added as Relief Defendants. Retrieved documents from the docket regarding issues in the litigation and drafted	2.50 362.00/hr	905.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	email to Receiver team regarding issues and the recoveries the case over a 10 year period. Retrieved language for use in CFX case against sales agents.		
2/2/2023	SGH Reviewed and responded to email from Sonila Themeli regarding litigation plan.	0.40 362.00/hr	144.80
2/6/2023	SSA Reviewed and commented on Sur-Reply in opposition to Receiver's motion to show cause.	0.50 276.00/hr	138.00
2/7/2023	SSA Continued review of records and coding of documents for interview with former employee Cindy Mezemo.	3.30 276.00/hr	910.80
2/8/2023	SSA Prepared for and attended interview of Cindy Mezomo. Drafted notes and questions or same.	2.50 276.00/hr	690.00
2/9/2023	SGH Reviewed banking laws on MSA and money orders. Considered issues. Drafted email regarding referral of PLS to Texas Banking Department to determine reporting requirements.	0.60 362.00/hr	217.20
2/13/2023	SGH Reviewed issues regarding sale agent litigation and emails regarding same.	0.40 362.00/hr	144.80
2/14/2023	SGH Conference call with Sonila Themeli and Scott Askue regarding litigation strategy and claims against sales agents and net winners. Discussed the Zeek Rewards model for the class action for all claims and pursuing on a contingent fee.	0.50 362.00/hr	181.00
	SSA Telephone conference with Sonila Themeli and Greg Hays regarding litigation strategy.	0.40 276.00/hr	110.40
2/20/2023	SGH Telephone call to Sonila Themeli regarding litigation strategy and filing the Ponzi scheme expert report. Discussed issues in completing the report and using the Salesforce data and report from crypto experts to clearly show the case was a Ponzi scheme. Discussed the case law and recent decision.	0.50 362.00/hr	181.00
2/21/2023	SSA Prepared account data from Salesforce for production to the Illinois Secretary of State's office. Drafted emails to Receiver team regarding same.	1.10 276.00/hr	303.60
	SGH Reviewed and researched additional documents for Ponzi expert report. Reviewed issues and information regarding office procedures and cash administration. Updated sections of report and searched Relativity for documents.	2.00 362.00/hr	724.00
2/22/2023	SGH Reviewed information regarding Gustavo Gomez and issues for interview. Reviewed Transfer Agreement and \$600,000 agreement. Drafted email to Kevin Duberstein regarding the transfer of \$500,000 in cryptos per the WhatsApp exchange before June 2021.	0.80 362.00/hr	289.60
	SGH Researched information for the Ponzi scheme expert report.	0.60 362.00/hr	217.20
	SSA Researched for information on Gustavo Gomez and documents supporting issues relating to same for interview.	1.30 276.00/hr	358.80
2/24/2023	SGH Reviewed 5th circuit case law on Ponzi schemes and reviewed draft of report on Ponzi schemes and cases to add to the report.	0.50 362.00/hr	181.00
2/28/2023	SGH Reviewed information regarding PLS claim.	0.30 362.00/hr	108.60
	SGH Responded to email from James Daniels regarding PLS issues.	0.30 362.00/hr	108.60
3/13/2023	SSA Researched for information relating to Quest Trust document request. Drafted email to Sonila Themeli regarding same.	0.40 276.00/hr	110.40

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/22/2023	SSA Telephone call from Sonila Themeli regarding estimated investors and investments and daily cash flow as reported by CryptoFX in preparation for Show Cause hearing.	0.80 276.00/hr	220.80
3/23/2023	SSA Reviewed and responded to Sonila Themeli's summary of show cause hearing.	0.20 276.00/hr	55.20
3/31/2023	SGH Reviewed status of the Ponzi report and considered information to add regarding the Bitcoin payments by investors during 2022.	0.80 362.00/hr	289.60
	Subtotal	60.60	19,993.60

Status Reports

1/23/2023	SGH Updated analysis of the chart of BTC price versus the funds raised by CFX for the upcoming report.	0.80 362.00/hr	289.60
1/24/2023	SGH Prepared an analysis and affidavit regarding the funds raised by CFX and the price of BTC. Updated the chart of from 11/1/22 to 9/28/22. Explained the Chart in an Affidavit. Emails with Kierra Power and Sonila Themeli regarding same.	1.50 362.00/hr	543.00
1/25/2023	SGH Updated graph and finalized the Affidavit to attach to the Second Interim Report.	0.90 362.00/hr	325.80
1/27/2023	SGH Drafted outline for Receiver's Second Interim Report and email to Sonila Themeli.	0.40 362.00/hr	144.80
	SGH Telephone call to Sonila Themeli regarding Second Interim Report.	0.40 362.00/hr	144.80
1/30/2023	SGH Reviewed and edited the Quarterly Report. Researched issues to add to the report. Corresponded with Sonila Themeli regarding issues for the report.	1.50 362.00/hr	543.00
1/31/2023	SGH Reviewed and edited second status report. Researched information for the report and added. Discussed pending issues with Scott Askue.	0.80 362.00/hr	289.60
	SSA Reviewed and edited Receiver's Second Interim Report.	1.60 276.00/hr	441.60
	SSA Prepared updated asset and recovery analysis for Second Interim Report.	0.60 276.00/hr	165.60
2/25/2023	SGH Reviewed status of research by Blocktrace. Email with James Daniels regarding status of fees to date. Drafted email to receiver regarding status and fees to date. Email to James Daniels regarding report to file with Receiver's Interim Report.	0.60 362.00/hr	217.20
3/28/2023	SGH Reviewed information for the quarterly report on BTC transactions.	0.40 362.00/hr	144.80
	Subtotal	9.50	3,249.80

Tax Issues

1/24/2023	SSA Prepared IRS forms 8809 for Receiver's signature to extend timing to file 1099s.	1.20 276.00/hr	331.20
1/26/2023	SSA Researched for tax id number for defendants and related entities.	1.00 276.00/hr	276.00
2/19/2023	JRJ Prepared Federal extension for year ended 12/31/2022 for CBT Group LLC. Electronically filed extension.	0.40 276.00/hr	110.40
	JRJ Prepared Federal extension for year ended 12/31/2022 for Crypto FX LLC. Electronically filed extension.	0.60 276.00/hr	165.60

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2023	JRJ Researched IRS e file rejects for 2022 extensions for Crypto FX and CBT Group. Researched documents to confirm single member LLC status as disregarded entities. Reviewed receiver Order. Discussed same with Scott Askue and payroll tax filings.	0.60 276.00/hr	165.60
	SSA Telephone call from Jim Jennings regarding various tax filing requirements, data and strategy for same.	0.40 276.00/hr	110.40
	SSA Researched for documents supporting tax treatment of CBT and CFX. Telephone call from Jim Jennings regarding same.	0.50 276.00/hr	138.00
2/27/2023	SSA Prepared form 8809 extension for additional time to prepare 1099s.	0.30 276.00/hr	82.80
3/31/2023	SSA Prepared letter to the IRS and Forms 8809 requesting additional time to prepare W2s and 1099s. Drafted email to the Receiver regarding same.	0.60 276.00/hr	165.60
	Subtotal	<hr/> 5.60	<hr/> 1,545.60
	For professional services rendered	<hr/> 391.00	<hr/> \$102,809.40

EXHIBIT D

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Additional Charges :

	<u>Amount</u>
<u>Expenses</u>	
1/31/2023 IDI charges January 2023	227.00
2/24/2023 Tax software licensing fee for filing of bankruptcy estate returns (CryptoFX LLC).	35.00
Tax software licensing fee for filing of bankruptcy estate returns (CBT).	35.00
3/31/2023 IdiCore research and comprehensive reports invoice #475393.	31.75
	<hr/>
Subtotal	328.75
	<hr/>
Total costs	\$328.75
	<hr/>
Total amount of this bill	<u><u>\$103,138.15</u></u>


EXHIBIT E

STANDARDIZED FUND ACCOUNTING REPORT for
Receivership in SEC v. Mauricio Chavez, Giorgio Benvenuto and Crypto FX, LLC - Cash Basis
Receivership; Civil Court Docket No. 4:22-cv-3359
Reporting Period 01/01/2023 to 03/31/2023

FUND ACCOUNTING (See Instructions:)				
		Detail (for Current Period)	Subtotal (From Prior Period)	Grand Total (All Periods)
Line 1	Beginning Balance	\$3,762,529.64		\$0.00
	Increases in Fund Balance:			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 3	Cash and Securities	\$0.00	\$3,392,411.14	\$3,392,411.14
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$67,798.11	\$0.00	\$67,798.11
Line 6	Personal Asset Liquidation	\$0.00	\$0.00	\$0.00
Line 7	Third-Party Litigation Income	\$0.00	\$0.00	\$0.00
Line 8	Miscellaneous - Other (Attorney Escrows)	\$157,228.70	\$370,118.50	\$527,347.20
	Total Funds Available (Lines 1-8)	\$3,987,556.45		\$3,987,556.45
	Decreases in Fund Balance:			
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	\$375,336.50	\$0.00	\$375,336.50
Line 10b	Business Asset Expenses	\$5,170.00	\$0.00	\$5,170.00
Line 10c	Personal Asset Expenses (Includes monthly budget for Defendant)	\$18,000.00	\$0.00	\$18,000.00
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	\$398,506.50	\$0.00	\$398,506.50
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):	\$398,506.50	\$0.00	\$398,506.50
Line 13	Ending Balance (As of 3/31/2023):	\$3,589,049.95		\$3,589,049.95

Line 14	Ending Balance of Fund - Net Assets:		
Line 14a	Cash & Cash Equivalents	\$3,589,049.95	\$3,589,049.95
Line 14b	Investments	\$0.00	\$0.00
Line 14c	Other Assets or Uncleared Funds (Frozen Accounts)		
	Total Ending Balance of Fund - Net Assets	\$3,589,049.95	\$3,589,049.95

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:			
	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
	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)
John Lewis, Jr.
 (printed name)
Receiver
 (title)

Date: June 16, 2023

EXHIBIT F

SEC v. CryptoFX LLC et al
Receipts and Disbursements**Receipts**

Cash	Cash located at 1124 Blalock	\$53,346
Cash in Safe	Recovered from two safes at Blalock	\$392,765
First Community Credit Union	Closed Benvenuto bank account	\$407,042
First Community Credit Union	Closed Benvenuto bank account	\$44,406
Bank of America	Closed Benvenuto bank account	\$16,825
Bank of America	Closed Benvenuto bank account	\$4,500
Simmons Bank	Closed Benvenuto bank account	\$80,764
Simmons Bank	Closed CBT bank account	\$247,916
Regions Bank	Closed Chavez bank account	\$782
Coinbase, Inc.	Proceeds from liquidation of crypto account	\$982,924
Blockchain.com	Proceeds from liquidation of crypto account	\$1,161,141
Burford Perry LLC	Balance of retainer	\$155,631
Gerger Hennessy & Martin LLP	Balance of retainer	\$214,488
Jones Walker Retainer	To be turned over to Receiver	\$102,229
Televisions	Located at 1124 Blalock	\$3,040
Pratt & Flack LLP	Cash turned over to the Receiver by Chavez	\$55,000
Hogan Lane, Hempstead TX	Net sale proceeds from sale of real property for \$70k	\$64,758
	Total Receipts	\$3,987,556

Disbursements

Webster's Auction Palace, Inc.	Inspection of contents at 1616 Post Oak Blvd	\$2,000
Hays Financial Consulting, LLC	Professional Fees and Expenses thru 12/31/22	\$95,264
John Lewis Jr., Receiver	Professional Fees and Expenses thru 12/31/22	\$62,895
Shook Hardy & Bacon, LLP	Professional Fees and Expenses thru 12/31/22	\$215,924
Pugh Accardo, LLC	Professional Fees and Expenses thru 12/31/22	\$554
Frank Jack Sodetz III	Fee for researching the on-going fraud in Chicago	\$700
Appraisal MC	Appraisal for Lot 1- Mack Washington, Hempstead TX	\$1,875
Plateau Land and Wildlife Management, Inc	Refile Wildlife Management Plan with Biologist Site Visit	\$1,295
Giorgio Benvenuto	Monthly Allowance - \$6,000 per month	\$18,000
	Total Disbursements	\$398,507

Cash in Bank (3/31/2023)**\$3,589,050**

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

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

(b) That the Receiver be conditionally awarded fees incurred during the Second Interim Fee Application in the amount of \$46,672.50; it is further ordered that

(c) That the Receiver's Retained Professionals be awarded fees incurred during the Second Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$323,534.50; Pugh Accardo, LLC \$1,079.50; and Hays Financial for \$102,809.40; it is further ordered that

(d) 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 SCIFA in the aggregate amount of \$23,623.19, are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

IT IS SO ORDERED this ____ day of _____, 2023.

JUDGE ANDREW S. HANEN
UNITED STATES DISTRICT JUDGE