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

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
VS.	§	
	§	
MAURICIO CHAVEZ, GIORGIO	§	CIVIL ACTION NO. 4:22-CV-03359
BENVENUTO and CryptoFX, LLC,	§	
	§	JUDGE ANDREW S. HANEN
Defendants.	§	
	§	
CBT Group, LLC,	§	
	§	
Relief Defendant.	§	

RECEIVER'S FIRST INTERIM FEE APPLICATION FOR BLOCKTRACE, LLC.

Pursuant to paragraphs 57-62 of this Court's Order Appointing Receiver ("Receivership Order") (Doc. No. 11), John Lewis, Jr. ("Receiver"), the Court-appointed Receiver for Mauricio Chavez ("Chavez"), Giorgio Benvenuto ("Benvenuto"), CryptoFX, LLC ("CryptoFX") and CBT Group, LLC ("CBT") (collectively, the "Receivership Defendants"), files this First Certified Fee Application for BlockTrace, LLC, showing the Court as follows:

SUMMARY OF FEE REQUEST

1. This First Interim Fee Application for BlockTrace, LLC ("BlockTrace") covers the period from January 5, 2023 to March 31, 2023 and is submitted in accordance with the Receivership Order, the local rules of this Court, and the Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission ("SEC") (the "Billing Instructions"). Receivership Order at ¶¶ 56 – 58.

- 2. During the Application Period, BlockTrace has incurred fees in the amount of \$149,724.00. *See* BlockTrace Invoices attached as **Exhibit A.**
- 3. The Receiver served a copy of this First Certified Fee Application for BlockTrace LLC ("BlockTrace Fee Application"), together with all exhibits and billing information, to counsel for the SEC. The Receiver and counsel for the SEC have conferred about the BlockTrace Fee Application 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.
- 4. The Receiver respectfully requests that this Court enter an order approving and authorizing, on an interim basis, the payment of fees incurred by BlockTrace during the Application Period in the amount of \$149,724.00.

FEE APPLICATION

- 5. 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).
- 6. 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.* The Receiver filed a motion to employ BlockTrace as cryptocurrency consultants on January 1, 2023 and on January 5, 2023, the Court entered an order authorizing the Receiver to employ BlockTrace. (Doc. No. 43).
- 7. The Receivership Order further provides that the Receiver's 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 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.

- 8. The Receiver employed BlockTrace to assist with the novelty, technical difficulty and complexity of a cryptocurrency forensic investigation in this case. The names, hours worked, hourly billing rates, and total fees of all BlockTrace professionals who have billed time to this matter are listed in **Exhibit A**.
- 9. The Receiver asks the Court to approve payments to BlockTrace, on an interim basis in the amount of \$149,724.00 for the Application Period.
- 10. In accordance with the Billing Instructions, BlockTrace has separately categorized the services they performed as the Receiver's cryptocurrency consultants. The following table summarizes the respective number of hours incurred relative to each task category during the Application Period:

Task Description	Hours Worked	Total Fees
Asset Analysis & Recovery	8.7	\$3,132.00
Case Administration	21.10	\$11,077.50
Data Analysis	400.1	\$144,036.00

ARGUMENT AND AUTHORITES IN SUPPORT OF APPLICATION

11. 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."
- 12. 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:
- 13. <u>Time and Labor Required</u>: BlockTrace expended the hours detailed in Exhibit A advising the Receiver on investigating fraud or crimes involving the use of cryptocurrencies and tracing sources of recovery. In support of this application, the Receiver submits Exhibit A 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.
- 14. <u>Novelty and Difficulty of Questions Presented</u>: The Receiver retained BlockTrace to assist with the novelty, technical difficulty and complexity of a cryptocurrency forensic investigation in this case.
- 15. <u>Skill Requisite to Perform Professional Services:</u> Cryptocurrency tracing involves analyzing tens of thousands of threads of Blockchain data to track and investigate cryptocurrency transactions. Cryptocurrency tracing is also time consuming, as it often leads to additional crypto wallet addresses without any identifying person or entity.
- 16. <u>Preclusion of Other Employment Due to Acceptance of the Cases</u>: BlockTrace has devoted significant time and resources to this case to the possible preclusion of involvement in other matters.

- 17. <u>Customary Fees for the Type of Services Rendered</u>: BlockTrace has 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.
- 18. 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. Compensation is "contingent" only in the sense that there are risks of non-allowance or non-payment.
- 19. <u>Time Limitations Imposed by the Client or Other Circumstances</u>: The time requirements during the period covered by this application have been substantial. The tasks performed by BlockTrace include analyzing 12,000 transactions identified between CryptoFX, Mauricio Chavez, and others, and unlocking, identifying, sourcing, and tracing 6,800 unique crypto wallets.
- 20. <u>The Amount Involved and Results Obtained</u>: BlockTrace's investigation has added value to the Receivership. During the Application Period, BlockTrace uncovered the following in their investigation:
 - a. Four (4) cryptocurrency transfers worth \$2.4 million from CryptoFX controlled accounts at Coinbase. These transactions were previously unknown to Receiver prior to BlockTrace's engagement.
 - b. Fifteen (15) accounts at Binance and Swithchain (previously unknown to Receiver) that received "suspicious transfers from CryptoFX.
 - c. CryptoFX sales leaders' cryptocurrency accounts received "investments" after Receiver's appointment.
 - d. To date, only approximately 60% of withdrawals from CryptoFX/Chavez Coinbase accounts have been traced.

- e. Discovery of Chavez's four (4) self-custodial accounts at Blockchain.com¹
- f. Discovery of CryptoFX/Chavez accounts at KOT4X, Bittrix, and Square.
- g. Three (3) Exodus Wallets used to move cryptocurrency transactions.
- 21. The Experience, Reputation, and Ability of the Professional: BlockTrace is an experienced and well-regarded firm. It has employed IRS and HIS Special Agents with over 20 years of experience in criminal and financial investigations backgrounds, including over 100 cryptocurrency tracing investigations and has trained federal, state, local and tribal governments in "Darknet/Crypto." BlockTrace's employee James Daniels has been qualified as testifying expert witnesses.
 - 22. <u>Undesirability of the Case</u>: This factor is inapplicable to the present case.
- 23. <u>Nature and Length of Professional Relationship with the Client</u>: BlockTrace is a new client of the Receiver and Shook, Hardy & Bacon, LLP and has been working for them since 2023.
- 24. <u>Awards in Similar Cases</u>: Professionals of the Receiver are regularly awarded compensation in receivership cases on the same basis as requested herein.
- 25. The work undertaken by BlockTrace was necessary to assist the Receiver with asset recovery and the investigation of fraud or crimes involving the use of cryptocurrencies in this case. Further, each task performed by BlockTrace was done so efficiently.

CONFERRAL WITH THE SEC

26. The Receiver and counsel for the SEC have conferred regarding the BlockTrace Fee Application and its compliance with the SEC's Billing Guidelines and this Court's

¹ A "self-custodial" wallet in cryptocurrency terminology refers to a cryptocurrency wallet where only the holder (Chavez) possesses and controls the private key to that wallet. Hence, given Chavez' invocation of the 5th Amendment, Receiver has not yet access these wallets or determine their value. Receiver's motion to compel Chavez' compliance with the Receivership Order and Chavez's response asserting his 5th Amendment rights is now fully briefed and awaiting this Court's ruling.

Receivership Order, and the reasonableness of the costs and expenses incurred in the ordinary course of the administration and operation of the Receivership.

27. The SEC does not oppose the Receiver's request for an order approving and authorizing, on an interim basis, the payment of fees to BlockTrace in the amount of \$149,724.00.

CONCLUSION

28. Based on the foregoing, the Receiver respectfully requests that the Court enter an order approving the Receiver's First Certified Interim Fee Application for BlockTrace LLC and authorizing the Receiver to immediately pay the fees requested to BlockTrace in the amount of \$149,724.00.

Dated: July 20, 2023. Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Poston E. Pritchett

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Counsel for John Lewis, Jr. Court-Appointed Receiver

CERTIFICATE OF CONFERENCE

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

/s/ Poston E. Pritchett
Poston E. Pritchett

CERTIFICATE OF SERVICE

I hereby certify that on this the 20th day of July, 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.

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Counsel for Defendant Giorgio Benvenuto

/s/ Poston E. Pritchett
Poston E. Pritchett

EXHIBIT

BLOCKTRACE, LLC

⊗ BLOCKTRACE

+1 5122228145 sales@blocktrace.com www.blocktrace.com

INVOICE

BILL TO SEC vs. CryptoFX Receiver John Lewis INVOICE DATE TERMS DUE DATE

1090 04/10/2023 Due on receipt 04/10/2023

Remit to: BLOCKTRACE, LLC Shaun MaGruder 1320 Arrow Point Dr Suite 501 #TW83

Cedar Park, TX 78613

Area	Hours	Amount
Asset Analysis and Recovery	8.7	\$3,132.00
Case Administration	7.1	\$2,556.00
Data Analysis	400.1	\$144,036.00
_	415.9	\$149,724.00

Name	Hours	Rate	Amount
James Daniels	23	\$360.00	\$8,280.00
Julio Castro	71.4	\$360.00	\$25,704.00
Kevin Duberstein	321.5	\$360.00	\$115,740.00
Professional Services Rendered	415.9		\$149,724.00

BALANCE DUE \$149,724.00

Asset Analysis and Recovery

<u>Date</u>	<u>Person</u>	<u>Detail</u>	<u>Hours</u>	<u>Amount</u>
01/12/23	JD	Exodus wallet - Export Transactions; Review Transactions	1.5	\$540.00
01/12/23	JD	Analize Exodus Wallet; Document Exodus wallet with screen shots of current balances	1.5	\$540.00
01/12/23	JD	Restore Exodus Wallet with seed phrase	0.5	\$180.00

01/12/23	Case 4:22-cv- JD	-03359 Document 80-1 Filed on 07/20/23 in TXSD Exodus wallet - Email Sonila; Hays; Askue - Current Balance information and recommendations on liquidation options	Page 3 of 18 0.5	\$180.00
02/10/23	KD	Emailed Coinbase to open account for Receiver to liquidate crypto.	0.5	\$180.00
02/15/23	KD	Contacting Coinbase to open an account as per Hays Consulting to liquidate the crypto currency found on the Exdous wallet.	1.8	\$648.00
03/28/23	KD	Receive email from Greg Hays, contact Coinbase to setup transfer of funds	0.7	\$252.00
03/28/23	JD	Emails with Coinbase regarding Exodus Wallet; Execute crypto transfers from Exodus Wallet to Coinbase account; document crypto transfers	1.7	\$612.00
		Subtotal Asset Analysis and Recovery	8.7	\$3,132.00
Case Admii	nistration			
<u>Date</u>	<u>Person</u>	<u>Detail</u>	<u>Hours</u>	<u>Amount</u>
01/05/23	JD	Meeting with G Hays and J Daniels to discuss CryptoFX. Discussed investigation to date and how cryptocurrency is involved	0.8	\$288.00
01/05/23	KD	Meeting with G Hays and J Daniels to discuss CryptoFX. Discussed investigation to date and how cryptocurrency is involved	0.8	\$288.00
01/11/23	KD	Draft email with financial account data stripped from all 6 Coinbase account to provide to Hays Consulting	1.5	\$540.00
03/06/23	KD	Draft email with data for subpoenas and send to JD for review	0.4	\$144.00
03/07/23	KD	Followup conversation on status of approval by Shook, Hardy, & Bacon regarding transferring crypto currency from Exdous wallet to Coinbase account.	0.5	\$180.00
03/20/23	KD	Read 2 emails from G. Hays regarding the case. Prepared and replied to each email	0.6	\$216.00
03/28/23	JC	Status call with J. Castro and K Duberstein; modifications made to report #2	0.5	\$180.00
03/28/23	KD	Status call with J. Castro and K Duberstein; modifications made to report #2	0.5	\$180.00
03/30/23	KD	Meeting J Castro, K Duberstein and J Daniels to review and modify report.	0.5	\$180.00
03/30/23	JD	Meeting J Castro, K Duberstein and J Daniels to review and modify report.	0.5	\$180.00

03/30/23	Case 4:22-cv-0	O3359 Document 80-1 Filed on 07/20/23 in TXSD Pag Meeting J Castro, K Duberstein and J Daniels to review and modify report.	ge 4 of 18 0.5	\$180.00
		Subtotal Case Administration	7.1	\$2,556.00
Data Analy	rsis			
<u>Date</u>	<u>Person</u>	<u>Detail</u>	<u>Hours</u>	<u>Amount</u>
01/05/23	KD	Review Crypto FX documents received from Hays.	1.2	\$432.00
01/05/23	JD	Review Crypto FX documents received from Hays.	0.5	\$180.00
01/09/23	KD	Review and Index documents received from Hays:EPROD-SEC-REC-000000205.xlsx; EPROD-SEC-REC-000000206.xlsx;EPROD-SEC-REC-000000207.xlsx;EPROD-SEC-REC-000000209.xlsx;EPROD-SEC-REC-000000210.xlsx;EPROD-SEC-REC-000000211.xlsx;20221007 Receiver Production CL.pdf;CB_422CV03359_00000001.xlsx;CB_422CV03359_00000002.xlsx;CB_422CV03359_00000003.xlsx;CB_422CV03359_00000004 - CB_422CV03359_00000009.pdf;EPROD-SEC-REC-000026004 UPHOLD RESPONSE.pdf;EPROD-SEC-REC-000026040 uphold letter.docx;Exhibit 3 gov.uscourts.txsd.1890735.3.3.pdf;Keyword list.csv;Taffinder or CryptoFX Exodus wallet.docx;CB_422CV03359_00000010.xlsx	1.2	\$432.00
01/09/23	KD	Review and Index documents received from Hays: EPROD-SEC-REC-000000016.xlsx; EPROD-SEC-REC-000000025.xlsx; EPROD-SEC-REC-0000000026.xlsx; EPROD-SEC-REC-0000000027.xlsx; EPROD-SEC-REC-000000042.xlsx; EPROD-SEC-REC-000000041.xlsx; EPROD-SEC-REC-000000051.xlsx; EPROD-SEC-REC-000000052.xlsx; EPROD-SEC-REC-000000139.xlsx; EPROD-SEC-REC-000000140.xlsx; EPROD-SEC-REC-000000167.xlsx; EPROD-SEC-REC-000000168.xlsx; EPROD-SEC-REC-000000170.xlsx; EPROD-SEC-REC-000000191.xlsx; EPROD-SEC-REC-000000192.xlsx; EPROD-SEC-REC-000000192.xlsx; EPROD-SEC-REC-000000192.xlsx; EPROD-SEC-REC-000000192.xlsx; EPROD-SEC-REC-000000192.xlsx; EPROD-SEC-REC-0000000192.xlsx; EPROD-SEC-REC-000000192.xlsx; EPROD-SEC-REC-0000000192.xlsx; EPROD-SEC-REC-0000000192.xlsx; EPROD-SEC-REC-000000000192.xlsx; EPROD-SEC-REC-0000000192.xlsx; EPROD-SEC-REC-000000000192.xlsx; EPROD-SEC-REC-0000000192.xlsx; EPROD-SEC-REC-00000000000192.xlsx; EPROD-SEC-REC-0000000192.xlsx; EPROD-SEC-REC-000000000000000000000000000000000	1.1	\$396.00
01/09/23	KD	Review and Index documents received from Hays: CFX_020711 ETH_07-01-2019_05-06-2022.csv; CFX_020712 exodus 001 CRYPTOFX_0-all-txs-2022-05-22_20-04-34.csv;CFX_020713 EXODUS 003 - ALL TRANSACTIONS exodus_0-all-txs-2022-05-22_19-51-45.csv;CFX_020714 exodus_0-all-txs-2022-05-23_13-17-04.csv;CFX_020715 N_BTC_01-01-2015_05-06-2022_copy.csv;EPROD-SEC-REC-000000001.xlsx;EPROD-SEC-REC-0000000015.xlsx	0.9	\$324.00

01/09/23	Case 4:22-cv-03 KD	Review and Index documents received from Hays:CFX_020412 - CFX_020429 (KOT4X).pdf; CFX_020430 - CFX_020434 (KOT4X).pdf;CFX_020435 - CFX_020447 (Blochain).pdf;CFX_020448 - CFX_020476 (Exodus).pdf;CFX_020477 - CFX_020478 (Bittrex).pdf;CFX_020479 - CFX_020706 (Coinbase).pdf;CFX_020707 BITTREX - CRYPTOFX transactions_HIFO_Universal-6 copy.csv;CFX_020708 BLOCCKCHAIN 002 - CRYPTOFX BTC_12-31-2019_05-22- 2022 copy.csv;CFX_020709 COINBASE CRYPTOFX transactions_HIFO_Universal-3.csv;CFX_020710 ETH_06- 30-2019_05-22-2022.csv	Page 5 of 18 1.3	\$468.00
01/09/23	KD	Review and Index documents received from Hays: Bittrex Statement; Balance.csv;Summary.txt;Orders.csv;IPAddressUsed.csv;Deposits.csv;Withdrawals.csv;Identity info.txt;front.png;back.png;face.png;Identity info.txt;front.png;back.png;face.png;Identity info.txt;front.png;back.png;face.png	0.8 e	\$288.00
01/10/23	KD	Review and analize account data for Coinbase account 5fb5aee4687e0805cd131299, identifying verified banking data and indexing crypto currency addresses	6.5	\$2,340.00
01/11/23	KD	Review account data from 6 Coinbase accounts (5fb5aee4687e0805cd131299, 59e52fb6ffe09203563d33fb, 52cd37b04323a13f6c0000ab, 5a25a5933677ea010563e272, 5ecdb723b5d3d005b78e385e, 60248db419a560107a9ba5d6)	2.6	\$936.00
01/12/23	KD	Analyze account data for Coinbase account 59e52fb6ffe09203563d33fb, identifying verified banking data and indexing crypto currency addresses	4.2	\$1,512.00
01/12/23	KD	Analyze account data for Coinbase account 5a25a5933677ea010563e272, identifying verified banking data and indexing crypto currency addresses	4.3	\$1,548.00
01/13/23	KD	Analyze account data for Coinbase account 5ecdb723b5d3d005b78e385e, identifying verified banking data and indexing crypto currency addresses	4.2	\$1,512.00
01/16/23	KD	Create separate spreadsheets for Coinbase accounts (5fb5aee4687e0805cd131299, 59e52fb6ffe09203563d33fb, 52cd37b04323a13f6c0000ab, 5a25a5933677ea010563e272, 5ecdb723b5d3d005b78e385e, 60248db419a560107a9ba5d6)	3.7	\$1,332.00

01/17/23	Case 4:22-cv-03 KD	359 Document 80-1 Filed on 07/20/23 in TXSD Review and analize account data from Coinbase accounts (5fb5aee4687e0805cd131299, 59e52fb6ffe09203563d33fb)	Page 6 of 18 2.6	\$936.00
01/17/23	JD	Meeting to review identified Coinbase account transactions with K Duberstein and J Daniels;	1.0	\$360.00
01/17/23	KD	Analyze account data for Coinbase account 52cd37b04323a13f6c0000ab, idenifying verified banking data and crypto currency addresses	3.7	\$1,332.00
01/17/23	KD	Meeting to review identified Coinbase account transactions with K Duberstein and J Daniels;	1.0	\$360.00
01/18/23	KD	Review and analize account data from Coinbase accounts (5fb5aee4687e0805cd131299, 59e52fb6ffe09203563d33fb, 52cd37b04323a13f6c0000ab)	1.8	\$648.00
01/18/23	KD	Review and analize account data from Coinbase accounts (5a25a5933677ea010563e272, 5ecdb723b5d3d005b78e385e, 60248db419a560107a9ba5d6)	2.1	\$756.00
01/18/23	JD	Review and analize account data from Coinbase accounts (52cd37b04323a13f6c0000ab)	0.9	\$324.00
01/18/23	KD	Create pivot table and analize data for Coinbase account 59e52fb6ffe09203563d33fb	3.3	\$1,188.00
01/19/23	JD	Review and analize account data from Coinbase accounts (5a25a5933677ea010563e272, 5ecdb723b5d3d005b78e385e, 60248db419a560107a9ba5d6)	0.9	\$324.00
01/19/23	KD	Create pivot table and analize data for Coinbase account 5a25a5933677ea010563e272	1.3	\$468.00
01/19/23	KD	Create pivot table and analize data for Coinbase account 5fb5aee4687e0805cd131299	2.8	\$1,008.00
01/19/23	KD	Create pivot table and analize data for Coinbase account 52cd37b04323a13f6c0000ab	2.7	\$972.00
01/23/23	KD	Create pivot table and analize data for Coinbase account 5ecdb723b5d3d005b78e385e	3.5	\$1,260.00
01/23/23	JD	Create pivot table and analize data for Coinbase account 5a25a5933677ea010563e272	1.5	\$540.00

01/24/23	Case 4:22-cv-03 KD	Create spreadsheet and master pivot table with all 6 Coinbase account combined (5fb5aee4687e0805cd131299, 59e52fb6ffe09203563d33fb, 52cd37b04323a13f6c0000ab, 5a25a5933677ea010563e272, 5ecdb723b5d3d005b78e385e, 60248db419a560107a9ba5d6); Analyze pivot data	Page 7 of 18 2.1	\$756.00
01/24/23	JD	Create pivot table and analize data for Coinbase account 60248db419a560107a9ba5d6	1.8	\$648.00
01/24/23	KD	Write report #1 draft, providing details of Coinbase accounts (5fb5aee4687e0805cd131299, 59e52fb6ffe09203563d33fb, 52cd37b04323a13f6c0000ab, 5a25a5933677ea010563e272, 5ecdb723b5d3d005b78e385e, 60248db419a560107a9ba5d6)	4.6	\$1,656.00
01/25/23	KD	Write report #1 draft, Adding citations of Coinbase accounts (5fb5aee4687e0805cd131299, 59e52fb6ffe09203563d33fb, 52cd37b04323a13f6c0000ab, 5a25a5933677ea010563e272, 5ecdb723b5d3d005b78e385e, 60248db419a560107a9ba5d6)	5.5	\$1,980.00
01/26/23	KD	Partical tracing transactions outbound from 14JwT3zTtbC8UDkCAUVBCFJ539FAdizpfV	2.1	\$756.00
01/26/23	KD	Continue writing report #1, documenting data contained within Coinbase accounts (5fb5aee4687e0805cd131299, 59e52fb6ffe09203563d33fb, 52cd37b04323a13f6c0000ab, 5a25a5933677ea010563e272, 5ecdb723b5d3d005b78e385e, 60248db419a560107a9ba5d6)	3.4	\$1,224.00
01/26/23	JD	Graph transactions leaving Coinbase account 52cd37b04323a13f6c0000ab	2.2	\$792.00
01/26/23	KD	Analyze transactions leaving Coinbase accounts, looking for patterns	2.7	\$972.00
01/27/23	KD	Review outbound transactions to Coinbase accounts 5ecdb723b5d3d005b78e385e and 59e52fb6ffe09203563d33fb	2.2	\$792.00
01/27/23	KD	Review outbound transactions to Coinbase accounts 52cd37b04323a13f6c0000ab and 5fb5aee4687e0805cd131299	2.8	\$1,008.00

01/27/23	Case 4:22-cv-033 KD	Review outbound transactions to Coinbase accounts 5a25a5933677ea010563e272 and 60248db419a560107a9ba5d6	Page 8 of 18 3.3	\$1,188.00
01/27/23	JD	Finish and submit report #1 for approval	3.7	\$1,332.00
01/30/23	KD	Graphing transactions from Fernandez Coinbase account through 31okNC, identifying transactions to Kraken addresses 33DRV5h, 3Qfzbk, 3MfxrYt and 33JhE5, Binance addresses 16tEdT and 1HDWAto,	1.6	\$576.00
01/30/23	KD	Combined graphs from Fernandez Coinbase account transfers to 19i8e, 1KqgFh, and 1JdPAZ after finding links to one large transaction.	1.9	\$684.00
01/30/23	KD	Graphing transactions from Chavez Coinbase account through 1p855NL, identifying transactions to Coinbase addresses 3LxHMs and 3FaqFr, LocalBitcoins address 3F3LK8, and Binance addresses 1M2b6f and 1G8oa4.	1.8	\$648.00
01/30/23	KD	Graphing transactions from Fernandez Coinbase account through 1JdPaZ, identifying transactions to SquareUp addresses 3L168Vo, 3MvNeD5R, and 3E94Cn4.	2.5	\$900.00
01/31/23	KD	Graphing transactions from Fernandez Coinbase account through 31okNC, identifying transactions to Genesis address bc1q4jch, WirexApp address 32kuZ6A, Coinbase address 3NGoTn, and unspent BTC at address bc1p2ws.	2.2	\$792.00
01/31/23	KD	Graphing transactions from Fernandez Coinbase account through 31okNC, identifying transactions to Kraken addresses 3H45DY, 3CLPki, 3BtABY and 3DW9ow, Instacoins address 335FQir, and unspent BTC in address 3GgYYk and 325PzvH.	3.3	\$1,188.00
01/31/23	KD	Graphing transactions from Fernandez Coinbase account through 31okNC, identifying transactions to Kraken addresses 3BUJfh, 3Njn7u, 32spPutS, 3QF3VA4, 3E7i1G and 3CUizWV.	1.7	\$612.00
02/01/23	KD	Graphing transactions from Fernandez Coinbase account through 329m4, identifying transactions to Kraken address 3LgEQSE and Coinbase addresses 3GQSpzo and 3CwbrA.	1.1	\$396.00
02/01/23	KD	Graphing transactions from Fernandez Coinbase account through 31okNC, identifying transactions to Kraken addresses 3Qws3Cx and 3NTasu, unspent BTC in addresses 35fxSTY and 1FiHXrU, and Coinbase address bc1qppmm.	2.8	\$1,008.00
02/01/23	KD	Graphing transactions from Fernandez Coinbase account through 31okNC, identifying transactions to Kraken addresses 3GY1YGR, 33FWVZj, Kucoin address 3BkN53, and Coinbase address 37um7RJ.	3.3	\$1,188.00

02/02/23	Case 4:22-cv-0 KD	3359 Document 80-1 Filed on 07/20/23 in TXSD Page Graphing transactions from Fernandez Coinbase account through 329m4, identifying transactions to Kraken address 3BtABY, KOT4X address, 3JPtwF, and Binance address 18wk8pm.	9 of 18 3.4	\$1,224.00
02/02/23	KD	Video call to Hays and email exchanges regarding significant transfer of Crypto currency to Binance address 19kcbBZ9.	0.7	\$252.00
02/02/23	KD	Graphing transactions from Fernandez Coinbase account through 329m4, identifying transactions to Kraken address 3Qws3C, KOT4X address 3E4ZT7, SquareUp addresses 1BPzsp and 3284EM, and Crypto.com address 38Y6s.	1.6	\$576.00
02/03/23	KD	Graphing transactions from Fernandez Coinbase account through 34de8D, identifying transactions to Kraken addresses 3LR4Ng, 3J8Yc5, 3ERXU2, 3KYWkg, and 3Fenzv6, B2BX address 39RcyS, and Coinsquare address 3L1WFEA.	3.2	\$1,152.00
02/03/23	KD	Graphing transactions from Fernandez Coinbase account through 34de8D, identifying transactions to B2BX/FMA crypto address 31rfNm, Kraken address 3NCibz, Binance addresses 18hSkiu and 1HDWAt, Bitpay address 19bXRn, and Coinbase address 3NdXTc.	2.6	\$936.00
02/06/23	KD	Graphing transactions from Fernandez Coinbase account through 34de8D, identifying transactions to Kraken address 3MfxrY, Genesis Trading address bc1q4jch, Deribit address 35KkAu, Binance address 19aaLsP, Blockchain.com address 38gfemn, and Coinbase address 3NGoTn.	2.3	\$828.00
02/07/23	KD	Graphing transactions from Fernandez Coinbase account through 34de8D, identifying transactions to Kraken addresses 32spPut, 3Qf3VA, and 3E7i1G, TheRock Trading address 3MBFPP, and unspent funds found at address bc1q3fa.	2.6	\$936.00
02/07/23	KD	Graphing transactions from Fernandez Coinbase account through 34de8D, identifying transactions to Bitfinex address bc1q4aa, Kraken addresses 3HTpqS, 33DRV5h, 3KTVXeJ, and 3Njn7u, and Binance address 1BwDqZC.	2.3	\$828.00
02/07/23	KD	Graphing transactions from Fernandez Coinbase account through 34de8D, identifying transactions to Coinbase addresses 3CCcTjX, 31hztRu, SquareUp address 3LQEZL, Paribu address 37Gp3N, and Paxful address 3J7dNK.	3.1	\$1,116.00
02/08/23	KD	Graphing transactions from Fernandez Coinbase account through 34de8D, identifying transactions to Bitpay addresses 18saUxz and 1MStgeL, SquareUp addresses 343Wf5 and 39YxDp.	1.8	\$648.00

02/08/23	Case 4:22-cv-033 KD	Graphing transactions from Chavez Coinbase account through 14JwT3z, identifying transactions to SwitchChain address 3HXNXA and Binance addresses 14xS53 and 1EaxfLr.	ge 10 of 18 2.2	\$792.00
02/09/23	KD	Graphing transactions from Chavez Coinbase account through 14JwT3z, identifying transactions to SwitchChain addresses 3JUgHAE and 3CSeY9M, Binance addresses 1DeEv8 and 1NdZxZk, and HugosWay address bc1qwg.	4.5	\$1,620.00
02/10/23	KD	Graphing transactions from Chavez Coinbase account through 1d8g7XKX, identifying transactions to Coinbase addresses 3569d3G and 3Ea5oXz, Crypto.com address 3J5kWpad, Binance addresses 18MBhUg and 1FA8JM4.	2.7	\$972.00
02/10/23	KD	Graphing transactions from Chavez Coinbase account through 1d8g7XKX, identifying transactions to SwitchChain address bc1qag8. Traced a newly located transfer receipt which was provided by Hays Consulting. Provided analysis in email to Hays. Followed up with an email identifying Binance and SquareUp addresses for potential subpoenas.	3.4	\$1,224.00
02/13/23	KD	Graphing transactions from Chavez Coinbase account through 1d8g7XKX, identifying transactions to SquareUp address 352Lu4 and Coinbase address 37tGccqa.	1.2	\$432.00
02/14/23	KD	Graphing transactions from Chavez Coinbase account through 1d8g7XKX, identifying transactions to ZTGlobal address 18uNw1gB, Kucoin addresses 3FEGMT and 3H8dVeP, Coinbase addresses 37E3LQ5U and 3QAmTVn.	2.7	\$972.00
02/14/23	KD	Graphing transactions from Fernandez Coinbase account through 1JdPaZsd and 1K1gFhbc, identifying transactions to SquareUp address 3E94Cn4. Also linked transactions tree to a transfer of 30 BTC to Binance address 19kcbBZ9.	3.5	\$1,260.00
02/15/23	KD	Review new subpoena return data from Binance. Located address in Fernandez transactions and labeled address with the account holder's name.	2.1	\$756.00
02/15/23	KD	Graphing transactions from Fernandez Coinbase account through 1Db3ExDx, identifying transactions to Coinbase address 13sfkaoL and SquareUp addresses 3MgDm93 and 38iphcrf.	3.0	\$1,080.00
02/16/23	KD	Graphing transactions from Fernandez Coinbase account through 1Db3ExDx, identifying transactions to Coinbase account 1NaBHZ9s, SquareUp addresses 3Fg68xZ and 3EbawtUc, and Binance address 1LKphU69. Also linked transaction tree to a transfer of 30 BTC to Binance address 19kcbBZ9.	3.5	\$1,260.00

02/16/23	Case 4:22-cv-033 KD	59 Document 80-1 Filed on 07/20/23 in TXSD Page 11 Graphing transactions from Fernandez Coinbase account through 1D4CetSh, identifying transactions to Crypto.com address 3PPyjXF and Coinbase address 3KrTvK2. Also linked transaction tree to a transfer of 30 BTC to Binance address 19kcbBZ9.	of 18 2.9	\$1,044.00
02/17/23	KD	Graphing transactions from Fernandez Coinbase account through 19i8eMsCb, identifying transactions to Gemini address 13hXxKiGDn, Coinbase address 3HGcT7MB, Crypto.com address 1HC9out8vA, Uphold addresses 1JSiERUUFP and 3LJckVxNbF, and Blockchain.com address 3BVCB8huQ. Also linked transaction tree to a transfer of 30 BTC to Binance address 19kcbBZ9.	2.8	\$1,008.00
02/17/23	KD	Graphing transactions from Fernandez Coinbase account through 13U6S7ELkb, identifying transactions to Paxful address 3MaC1Vpv and SquareUp address 1NScreTyPR. Also linked transaction tree to a transfer of 30 BTC to Binance address 19kcbBZ9.	3.3	\$1,188.00
02/20/23	KD	Graphing transactions from Fernandez Coinbase account through 1508Zsrp, identifying transactions to SquareUP addresses 3Fft2GXaC and 39ADYxdphU, Coinbase address 3MeJyTsFh, and crypto.com address 3LJHAt7ja. Also linked transaction tree to a transfer of 30 BTC to Binance address 19kcbBZ9.	2.4	\$864.00
02/20/23	KD	Graphing transactions from Fernandez Coinbase account through 1508Zsrp, identifying transactions to SquareUp addresses 3BDeC7fR and 382eqnaomS, crypto.com address 381fYmpwDUX and Coinbase addresses 37vXHe64 and 3GW9irT6	3.3	\$1,188.00
02/21/23	KD	Graphing transactions from Fernandez Coinbase account through 1CAvLzKGG, identifying transactions to Bitstamp address 3BNWVhr, SquareUp addresses 3Asr4En and 3Jb3DE6, Coinbase addresses 34aBhr17 and 33s4H5Y8. Also linked transaction tree to a transfer of 30 BTC to Binance address 19kcbBZ9.	3.9	\$1,404.00
02/22/23	KD	Graphing transactions from Fernandez Coinbase account through 1CAvLzKGG, identifying transactions to Binance address 12FLxMeDW, Bitstamp address 3J1CVu7, unspent BTC at address 3JEx2mxc, and SquareUp address 36U6k497	3.4	\$1,224.00
02/22/23	KD	Graphing transactions from Fernandez Coinbase account through 1KqahKWN, indentifying transactions to SquareUp address 3KABkAj6, crypto.com addresses 3LJHAt7ja and 35a6NE81, and Binance address, 1M1QMtw. Also linked transaction tree to a transfer of 30 BTC to Binance address 19kcbBZ9.	3.1	\$1,116.00

02/23/23	Case 4:22-cv-033 KD	59 Document 80-1 Filed on 07/20/23 in TXSD Graphing transactions from Fernandez Coinbase account through 1KqahKWN, identifying transactions to Binance address 1Ez2GTrVhB, Kraken addresses 3Qws3CxDz and 3JRL8aSY, and Kucoin address 3MKpdXcsEk	Page 12 of 18 3.5	\$1,260.00
02/23/23	KD	Graphing transactions from Fernandez Coinbase account through 1KqahKWN, identifying transactions to Binance addresses 1LofcDy7 and 1FUzLxBTZ, Coinbase address 3KUyYSz, and unspent BTC in bc1qt4wuq and bc1qvra4ns.	1.8	\$648.00
02/24/23	KD	Graphing transactions from 13U6S7EL, creating a legend and updating address notations that information was provided for subpoena requests	2.6	\$936.00
02/24/23	KD	Graphing transactions from Fernandez Coinbase account through 1KqahKWN, identifying transactions to Binance addresses 18wDqZCu5 and 1Ex2GTrV	1.4	\$504.00
02/27/23	KD	Reviewed and index newly provided documents xREL0000009314.pdf and xREL0000009313.xlsx, and 2/24/23 email	1.2	\$432.00
02/27/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, identifying transfers to Coinbase address 1MmyWNVH, and Binance addresses 13fHSpVRU2E and 1AACKik6	3.3	\$1,188.00
02/27/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, identifying transfers to Binance address 1KAbWupFQW, Blockchain.com address 345GjmFB, and Qubit scam addresses 3CuEsLm9CH and 39VskEhjv.	2.9	\$1,044.00
02/28/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, identifying transfers to Coinbase address 37fXghERH, 3JrLoFag, 3QbX7iD, and 3PMmSpiQ, and Binance address 1RHdNPBq	3.2	\$1,152.00
02/28/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, identyfing transactions to mycryptounit address 3NT7jWX, and unspent BTC at address 17vB7B6M	1.9	\$684.00
02/28/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, organizing transaction tree flow into a readable format which provides for addition of more branches of the transaction tree.	2.6	\$936.00
03/01/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, idenitfying a Brooks Invest address 3Qm3LzL. tracing out change in Transaction tree after transfer of 30 BTC to Binance account 19kcbBZ9, identified SquareUp address 3CEdneq.	3.4 d	\$1,224.00

03/01/23	Case 4:22-cv-03: KD	359 Document 80-1 Filed on 07/20/23 in TXSD Page Graphing transactions from Chavez Coinbase account through1Msfx5TD, identifying a LocalBitcoins address bc1qqg7, crypto.com address 38ikaRKJz1, and a Coinbase address 3QSDWn4	age 13 of 18 2.7	\$972.00
03/01/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, 3/15/2022 transaction forward, identifying transfers to coinbase addresses 37fXghER and 38qgKa1f.	2.4	\$864.00
03/03/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, 3/15/2022 transaction forward, identifying transfers to coinbase addresses 37fXghER and 38qgKa1f.	2.2	\$792.00
03/03/23	KD	Graphing transactions from Chavez Coinbase account through 1Msfx5TD, idenitfying a Brooks Invest address 3Qm3LzL. tracing out change in Transaction tree after transfer of 30 BTC to Binance account 19kcbBZ9, identified SquareUp address 3CEdneq.	2.9	\$1,008.00
03/03/23	KD	Graphing transactions from Chavez Coinbase account through1Msfx5TD, identifying a LocalBitcoins address bc1qqg7, crypto.com address 38ikaRKJz1, and a Coinbase address 3QSDWn4	3.1	\$1,116.00
03/06/23	JD	Review Documents EPROD-SEC-REC-000014624 and EPROD-SEC-REC-000014627; Send Email regarding review to Hays Consulting	0.5	\$180.00
03/06/23	JD	Status meeting with J Daniels and K Duberstein regarding newly provided exodus spreadsheet data and prioritizing the identification of Gustavo Gomez accounts to subpoena	0.5	\$180.00
03/06/23	KD	Status meeting with J Daniels and K Duberstein regarding newly provided exodus spreadsheet data and prioritizing the identification of Gustavo Gomez accounts to subpoena	0.5	\$216.00
03/06/23	KD	Analyze new spreadsheet data related to exodus wallets and find a link to Gustavo Gomez accounts	3.1	\$1,116.00
03/06/23	KD	Reviewed and indexed xREL0000009313.xlsx and xREL0000009314.pdf	1.8	\$648.00
03/07/23	JD	Email to Askue regarding new found documents;	0.1	\$36.00
03/07/23	KD	Review and index newly uploaded documents in folder Exodus 3-7-2023; extract and index cryptocurrency addresses	3.2	\$1,152.00
03/07/23	KD	Extract and index cryptocurrency addresses EPROD-SEC-REC-000014627 (1).xls & EPROD-SEC-REC-000014624.xlsx	2.1	\$756.00
03/07/23	JD	Start analysis of additional Exodus Wallets; 3 different wallets identified	0.2	\$72.00

03/07/23	Case 4:22-cv	-03359 Document 80-1 Filed on 07/20/23 in TXSD Pa Email to Sonila; Hays; Askue regarding transactions related to Gustavo	ge 14 of 18 0.2	\$72.00
03/07/23	KD	Review and index newly uploaded documents in folder March 6, 2023; EPROD-SEC-REC-000014627 (1).xls & EPROD-SEC-REC-000014624.xlsx; extract and index cryptocurrency addresses	1.4	\$504.00
03/08/23	KD	Review and index newly uploaded documents in folder KOT4X 3-7-2023; extract cryptocurrency addresses	1.6	\$576.00
03/08/23	KD	Reviewed and indexed EPROD-SEC-REC-000014624.xlsx, EPROD-SEC-REC-000014627 (1).xlsx, EPROD-SEC-REC-000014619.pdf, EPROD-SEC-REC-000014628.csv	3.1	\$1,116.00
03/08/23	KD	Reviewed and indexed EPROD-SEC-REC-000014629.csv, EPROD-SEC-REC-000014694.xlsx, EPROD-SEC-REC-000017576.pdf, EPROD-SEC-REC-000017579.pdf, xREL0000001520.XLSX, xREL0000007417.XLSX	2.8	\$1,008.00
03/09/23	KD	Reviewed an indexed EPROD-SEC-REC-000014616.pdf, EPROD-SEC-REC-000014617.pdf, EPROD-SEC-REC-000014628.csv, EPROD-SEC-REC-000014629 (1).csv, EPROD-SEC-REC-000014701.pdf, EPROD-SEC-REC-000014702.pdf, EPROD-SEC-REC-000014704.xlsx, xREL0000000258.PDF	3.4	\$1,224.00
03/09/23	KD	Reviewed an indexed xREL0000000259.PDF, xREL0000000276.CSV, xREL0000000278 (2).CSV, xREL00000006807.PDF, xREL0000006822.CSV	2.1	\$756.00
03/09/23	KD	Reviewed an indexed xREL0000006823 (1).CSV, xREL0000007241.CSV, xREL0000007242.CSV, xREL0000007243.CSV, xREL0000007292.CSV, xREL0000007293.CSV, xREL0000007364.PNG, PRWCSWTXLLC-000001-1.31.23-PRWCSWTXLLC-000020-1.31.23 (Coinbase Transfers).pdf	2.0	\$720.00
03/10/23	KD	Reviewed all Maricio Chavez graphs and inserted attributed names to addresses from recently provided document exodus documents	4.3	\$1,548.00
03/14/23	JC	Analyzed CryptoFX documents from SEC and reports written to date.	1.3	\$468.00
03/16/23	JC	Analyzed Coinbase account 5fb5	0.8	\$288.00
03/16/23	JC	Analyzed Coinbase account 52cg	1.3	\$468.00
03/16/23	JC	Analyzed Coinbase account 5a25	0.9	\$324.00
03/16/23	JC	Analyzed Coinbase account 5ecd	0.7	\$252.00
03/16/23	JC	Analyzed Coinbase account 6024	1.2	\$432.00

03/16/23	Case 4:22-cv-033	59 Document 80-1 Filed on 07/20/23 in TXSD Analyzed Coinbase account 59e5	Page 15 of 18 1.1	\$396.00
03/17/23	JC	Analyzed graphs for all accounts.	3.8	\$1,368.00
03/20/23	JC	Analized and summarized transactions for the graphs 1508. Imported the information into the report.	1.6	\$576.00
03/20/23	JC	Analyzed and summarized transactions for the graphs 1JdP. Imported the information into the report.	2.2	\$792.00
03/20/23	JC	Analized and summarized transactions for the graphs 1CAv. Imported the information into the report.	2.3	\$828.00
03/20/23	JC	Analized and summarized transactions for the graphs 1Kga. Imported the information into the report.	2.1	\$756.00
03/20/23	KD	Created spreadsheet of addresses within Exodus wallet clusters bc1q3agar, 1Msfx5T, 1d8g7XK, and bc1qsgi	0.5	\$180.00
03/21/23	JC	Analyzed and summarized transactions for the graphs 13U6, 1D4c, 1Db3, and 19i8 . Imported the information into the report.	3.4	\$1,224.00
03/21/23	JC	Analyzed and summarized transactions for the graphs 1P85, 14Jw, 1Msf, and 328M. Imported the information into the report.	2.5	\$900.00
03/21/23	JC	Analyzed and summarized transactions for the graphs 329m, 34de, and 1d8g. Imported the information into the report.	2.3	\$828.00
03/21/23	KD	Prepared additional tracing information and graphs for report	3.2	\$1,152.00
03/21/23	KD	Analized and summarized transactions leaving wallet address 1d8g7XK.	3.1	\$1,116.00
03/21/23	KD	Analized and summarized transactions leaving wallet address 1CAv.	1.7	\$612.00
03/22/23	JC	Analized and summarized transactions for the graphs 1Db3 and 19i8 .	2.2	\$792.00
03/22/23	KD	Traced transactions leaving wallet address 329m4w, 34de8D	3.1	\$1,116.00
03/22/23	KD	Traced transactions leaving wallet address 13U6S, 328 ME	3v 2.8	\$1,008.00
03/22/23	JC	Analized and summarized transactions for the graphs 1508 and 1JdP.	8 2.4	\$864.00
03/22/23	JC	Analized and summarized transactions for the graphs 1Kga and 1CAv.	a 1.6	\$576.00
03/22/23	KD	Traced transactions leaving wallet address 1Msfx5T	2.2	\$792.00

03/22/23	Case 4:22-cv-03	Analized and summarized transactions for the graphs 13U6 and 1D4c.	Page 16 of 18 2.1	\$756.00
03/23/23	KD	Analized and summarized for transactions leaving wallet address 15o8Z, 1Db3E and 1JdPaZ	3.3	\$1,188.00
03/23/23	KD	Analized and summarized transactions leaving wallet address 19i8e and 1p855	1.6	\$576.00
03/23/23	KD	Analized and summarized transactions leaving wallet address 1Kqah, 1CAvL	2.5	\$900.00
03/23/23	JC	Modified draft summary report for review to J Daniels	0.5	\$180.00
03/23/23	JC	Revised summary for 1d8g and completed table summarizing findings for 1d8g.	1.0	\$360.00
03/23/23	JC	Analized and summarized transactions for the graphs 329m, 34de, and 1d8g.	2.1	\$756.00
03/23/23	JC	Analized and summarized transactions for the graphs 1P85, 14Jw, and 328M.	1.7	\$612.00
03/23/23	JC	Analized and summarized transactions for wallet address 1Msfx5T.	0.5	\$180.00
03/24/23	JC	Analized and worked on spreadsheets for graph 1d8g. Revised chart summaries based on additional tracing.	2.1	\$756.00
03/24/23	JC	Revised chart summaries based on additional tracing.	2.8	\$1,008.00
03/24/23	JD	Meeting with J Castro, J Daniels and K Duberstien to discuss progress. Worked on spreadsheets for graph 1d8g. Revised chart summaries based on feedback provided.	0.5	\$180.00
03/24/23	KD	Analized and summarized for transactions leaving wallet address 1p855, 1D4C	3.1	\$1,116.00
03/24/23	KD	Create master spreasheet for report #2, Clean up graphs for all existing graphs	2.2	\$792.00
03/24/23	KD	Analized and summarized transactions leaving wallet address 14JwT, 1Msfx	1.7	\$612.00
03/24/23	KD	Meeting with J Castro, J Daniels and K Duberstien to discuss progress. Worked on spreadsheets for graph 1d8g. Revised chart summaries based on feedback provided.	0.5	\$180.00
03/24/23	JC	Meeting with J Castro, J Daniels and K Duberstien to discuss progress. Worked on spreadsheets for graph 1d8g. Revised chart summaries based on feedback provided.	0.5	\$180.00
03/27/23	JC	Created Pivot Table for graph addresses.	2.6	\$936.00

03/27/23	Case 4:22-cv-033	59 Document 80-1 Filed on 07/20/23 in TXSD Pa Create tracing graphs suppoorting documentation for report #2	ge 17 of 18 1.2	\$432.00
03/27/23	JC	Analized and summarized transactions for graphs 1kga, 1CAv, 1508, 1JdP, and 13U6. Updated report. Created analysis pivot table to summarize transactions.	2.1	\$756.00
03/27/23	JC	Updated report to include modified summaries and additional tracing information.	1.6	\$576.00
03/27/23	KD	Update attribution list for subpoenas for additional tracing performed	0.8	\$288.00
03/28/23	JC	Updated summaries for table amounts obtained from pivot table.	2.2	\$792.00
03/28/23	JC	Update report with supporting documation; tracing graphs; reports from excel files	1.5	\$540.00
03/28/23	KD	Analized and updated tracing transactions for report #2	1.7	\$612.00
03/29/23	JC	Analized and updated tracing transactions for report #2	2.4	\$864.00
03/29/23	JC	Appended and documented supporting reports and graphs to report #2	1.8	\$648.00
03/29/23	KD	Update graph for 1Msfx5T, tracing out payments and transfers to attributed addresses	3.1	\$1,116.00
03/29/23	KD	Update graph for 1Msfx5T, tracing out payments and transfers to attributed addresses	2.3	\$828.00
03/30/23	JC	Attached documents to report and completed citing.	2.5	\$900.00
03/30/23	KD	Completed graphing, adding to master payments, and summary for 1d8g7XK	3.3	\$1,188.00
03/30/23	KD	Completed graphing, adding to master payments, and summary for 1Msfx5T	3.1	\$1,116.00
03/30/23	JD	Review and modify report #2	0.5	\$180.00
03/30/23	JC	Reviewed Graph and Bullet points for 1Msf. Attached documents to report and completed citing. Converted Report to PDF.	1.6	\$576.00
03/30/23	KD	Revised and uploaded updated supporting documents in report #2	1.5	\$540.00
03/31/23	KD	Update graph for 14JwT3, tracing out payments and transfers to attributed addresses	2.8	\$1,008.00
03/31/23	JC	Status upate call with K Duberstein and J Daniels; Review and modify report #2	0.5	\$180.00

03/31/23	Case 4:22-cv-033	Reviewed and modified report #2; documentated supporting information	Page 18 of 18 2.8	\$1,008.00
03/31/23	JC	Made format, revisions, and citing updates to report based on feedback from meeting.	1.8	\$648.00
03/31/23	JD	Review and modify report #2	0.5	\$180.00
03/31/23	JD	Status upate call with K Duberstein and J Daniels; Review and modify report #2	0.5	\$180.00
03/31/23	KD	Uploaded additional documents into report #2, added requested data and modified data sections in report	1.5	\$540.00
03/31/23	KD	Status upate call with K Duberstein and J Daniels; Review and modify report #2	0.5	\$180.00
03/31/23	KD	Update graph for 1p855NL, tracing out payments and transfers to attributed addresses	2.7	\$972.00
		Subtotal Data Analys	is 400.1	\$144,036.00
		Tota	415.9	\$149,724.00

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

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
VS.	§	
	§	CIVIL ACTION NO. 4:22-CV-03359
MAURICIO CHAVEZ, GIORGIO	§	
BENVENUTO and CryptoFX, LLC,	§	JUDGE ANDREW S. HANEN
	§	
Defendants.	§	
	§	
CBT Group, LLC,	§	
	§	
Relief Defendant.	§	

ORDER AUTHORIZING PAYMENT OF RECEIVER'S FIRST INTERIM FEE APPLICATION FOR BLOCKTRACE, LLC

On July ___, 2023, John Lewis, Jr., the Court-appointed Receiver for Mauricio Chavez ("Chavez"), Giorgio Benvenuto ("Benvenuto"), CryptoFX, LLC ("CryptoFX"), and CBT Group, LLC ("CBT"), filed a First Certified Fee Application for BlockTrace, LLC ("BlockTrace Fee Application"), which seeks approval of the fees incurred by BlockTrace, LLC from January 1, 2023 through March 31, 2023 (the "Application Period").

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

Receiver's request. The Court finds and determines that good cause exists to approve the

Receiver's BlockTrace Fee Application. Accordingly, the Court finds and determines as follows:

(a) The Receiver's First Interim Fee Application for BlockTrace, LLC should be and

hereby is granted; it is further ordered that

(b) That the BlockTrace, LLC shall be conditionally awarded fees incurred during the

First Interim Fee Application for BlockTrace in the amount of \$149,724.00; it is further ordered

that

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

JUDGE ANDREW S. HANEN

UNITED STATES DISTRICT JUDGE