

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

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

RECEIVER’S FOURTH CERTIFIED INTERIM FEE APPLICATION

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 his Fourth Certified Interim Fee Application, showing the Court as follows:

SUMMARY OF FEE REQUEST

1. This Fourth Certified Interim Fee Application (“FCIFA”) covers the period from July 1, 2023 to September 30, 2023 (the “Application Period”) 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. This is the fourth fee application that the Receiver has made for himself and his retained professionals. On February 23, 2023, the Receiver filed his first certified fee application covering the period from September 29, 2022 to December 31, 2022, which was granted by the Court on March 23, 2023. (Doc. Nos. 54, 67). On June 16, 2023, the Receiver filed his second certified fee application covering the period from January 1, 2023 to March 31, 2023, which at the time of this filing has not been ruled on. (Doc No. 75). The Receiver also filed Third Interim Fee Application for Hays Financial Consulting, LLC (“HFC”) on August 8, 2023, at the request of HFC, and then filed his own Third Interim Fee Application August 17, 2023.

3. The fees incurred during the Application Period by the Receiver and professionals retained by the Receiver and for which payment is requested, are as follows: \$15,435.00 John Lewis, Jr. (*see* Receiver’s Invoice attached as **Exhibit A**); \$65,900.54 Shook, Hardy & Bacon L.L.P. (“SHB”) (*see* SHB Invoice attached as **Exhibit B**); and \$30,857.40 Hays Financial Consulting, LLC (“Hays”) (*see* Hays Invoice attached as **Exhibit C**). The Receiver’s professional fees listed above have been reduced by \$4,305.00. Further, his counsel’s fees have been reduced by \$3,145.00.

4. The Receiver served a copy of this FCIFA, together with all exhibits and billing information to counsel for the SEC. The Receiver and counsel for the SEC have conferred about the FCIFA 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 FCIFA as follows: to the Receiver in the amount of \$15,435.00; to Shook Hardy and Bacon, LLP in the amount of \$65,900.54; and Hays in the amount of \$30,857.40. The Receiver further asks that the Court authorize the Receiver to

reimburse the out-of-pocket costs and expenses incurred by the Receiver in the ordinary course of the administration and operation of the Receivership in the aggregate amount of \$135.04.

STANDARDIZED FUND ACCOUNTING REPORT

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

CASE STATUS

7. Cash on Hand: The Receivership Estate has \$2,639,671.22 deposited in four trust accounts named for each of the Defendants as of the end of the Application Period (June 30, 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).

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 (September 30, 2023), the Receiver has on hand the following assets.

Asset	Estimated Amount/Value
Various Laptops and desktop computers	\$5,000
Real Property: Mack Washington, Hempstead, TX	\$1,080,000
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). 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 Receiver anticipates filing a motion to approve the sale of the Mack Washington property in due course and anticipates netting approximately \$950,000.

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 \$135.04 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$135.04 were advanced by SHB.

13. Investor/Creditor Claims: The Receiver is still evaluating investments made with CryptoFX based upon CryptoFX and CBT records, documents produced by third parties, deposition testimony, and interviews with former CryptoFX and CBT employees as well as sales agents/sponsors/leaders and investors. At present, the Receiver, through an incomplete forensic review, has credible evidence that estimates that approximately 40,000 individuals invested in CryptoFX.

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 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 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
37.60	<i>See Ex. A</i>	\$15,435.00	\$0	\$15,435.00

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

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
165.10	<i>See Ex. B</i>	\$65,765.50	\$135.04	\$65,900.54

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

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
120.10	<i>See Ex. C</i>	\$30,752.40	\$105.00	\$30,857.40

26. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$65,900.54 for the Application Period. The Receiver asks the Court to approve payments to the Receiver, on an interim basis in the amount of \$15,435.00 for the Application Period. The Receiver asks the Court to approve payments to Hays in the amount of \$30,857.40 for the Application Period.

27. 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	23.10	\$7,822.50
Case Administration	2.20	\$1,155.00
Data Analysis	2.50	\$1,312.50
Status Reports	8.10	\$4,252.50
Litigation	1.7	\$892.50

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

Task Description	Hours Worked	Total Fees
Asset Analysis	2.80	\$1,141.00
Asset Disposition	3.10	\$1,317.50
Case Administration	110.70	\$45,177.50
Claims Administration	1.10	\$467.50
Accounting	1.90	\$807.50
Data Analysis	0.40	\$72.00
Status Reports	21.60	\$7,905.00
Litigation Consulting	1.50	\$637.50
Litigation	22.00	\$8,240.00

Receiver's Accountant, Hays Financial Consulting, LLC

Task Description	Hours Worked	Total Fees
-------------------------	---------------------	-------------------

Accounting	4.20	\$1,185.00
Asset Analysis & Recovery	0.70	\$193.20
Business Analysis	2.30	\$486.40
Case Administration	6.90	\$2,373.40
Claims Administration	1.30	\$358.80
Communications	0.7	\$253.40
Fee Application	11.40	No Charge
Forensic Accounting	0.7	\$253.40
Litigation Consulting	0.40	\$110.40
Status Reports	2.80	979.20
Tax Issues	88.30	\$24,491.20

ARGUMENT AND AUTHORITES IN SUPPORT OF APPLICATION

28. 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.”

29. 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:

30. 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 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.

a. Novelty and Difficulty of Questions Presented: The Services performed involved issues of varying complexity, as set forth in substantial detail in the billing statements attached to this Application.

b. Skill Requisite to Perform Professional Services: The Receiver and his professional team possess substantial expertise and experience in bankruptcy, receiverships, litigation, and related fields and are well-qualified to perform the professional Services.

c. Preclusion of Other Employment Due to Acceptance of the Cases: The Receiver and his team devoted time and resources to this case to the possible preclusion of involvement in other matters.

d. Customary Fees for the Type of Services Rendered: SHB have charged fees that are at or below the standard billing rates for the professionals working on this matter, and those

fees are at or below customary fees charged by like professionals in their respective markets. SHB's flat rate of \$425.00 per hour is a significant discount to the normal billing rate of \$600.00-\$730.00 per hour for the attorneys working on this matter.

e. In addition, the Receiver's professional fees listed above have been reduced by \$4,305.00. And, SHB's fees have been reduced by \$3,145.00. SHB's expenses are billed with no mark-up added.

f. Whether the Fee is Fixed or Contingent: The requested fees are subject to Court approval and are primarily based upon hourly rates without any fixed or flat fees. *See also* Order setting all counsel rates in this case at \$425/hr. (Doc. No. 67). Compensation is "contingent" only in the sense that there are risks of non-allowance or non-payment.

g. Time Limitations Imposed by the Client or Other Circumstances: The time requirements during the period covered by this application have been substantial. The tasks performed by the Receiver and his team include investigating, locating, taking possession, and liquidating Defendants' assets; responding to investors; analyzing new information learned from the ongoing investigation; monitoring and updating the Receiver's website; analyzing company documents, documents produced by witnesses at depositions or interviews, and documents produced by third parties in response to subpoenas; responding to investor questions and concerns; motion practice; and reporting information as necessary to the Court.

h. The Amount Involved and Results Obtained: Furthermore, the Receiver and his advisors have performed tasks that have added value to the Receivership by locating, taking possession of, and liquidating Receivership assets. The Receiver and his advisors have taken actions during the Application Period including, but not limited to, the following:

- a. Maintaining a Receiver Website (cryptofxreceiver.com), email address (receivership@shb.com), and phone number (713-546-5614) so that

investors can receive information pertaining to the receivership in both English and Spanish.

- b. Communicating with investors by phone and email;
- c. Conducting interviews of investors;
- d. Conducting interviews of additional sales agents;
- e. Identifying and securing receivership assets;
- f. Maintaining cryptocurrency wallets and/or accounts containing Bitcoin cryptocurrency;
- g. Coordinating valuation and sale of Receivership personal property;
- h. Corresponding with third parties to identify potential receivership assets;
- i. Analyzing emails, text messages, and other records to evaluate Receivership Defendant assets;
- j. Preparing charts showing amount of assets received by CryptoFX;
- k. Preparing of paper and electronic records for a detailed forensic analysis;
- l. Reviewing CryptoFX and CBT business records obtained from investors or in response to third-party subpoenas;
- m. 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;
- n. Analyzing company records to evaluate potential claims against third parties;
- o. Managing a Relativity database in order to store and review company documents.
- p. Conducting public records searches and related due diligence to affiliated parties, entities, and other potential relief defendants;
- q. Preparing the Receiver's Third Interim Status Report;
- r. Working with Dimas Realty team to prepare the Mack Washington Property for sale.
- s. Reviewing records received from third parties to perform asset tracing analysis;

- t. Working with real estate broker and real estate appraisers to evaluate and liquidate real property;
- u. Working with Webster's Auction Palace to appraise and evaluate the value of personal property.
- i. The Experience, Reputation, and Ability of the Professional: The Receiver and his team have extensive experience in receivership, bankruptcy, and litigation matters.
- j. Undesirability of the Case: This factor is inapplicable to the present case.
- k. Nature and Length of Professional Relationship with the Client: SHB and Hays have worked with the Receiver prior to being retained in these proceedings and maintains an ongoing relationship.
- l. Awards in Similar Cases: The Receiver and the professionals of the Receiver are regularly awarded compensation in receivership cases on the same basis as requested herein.

31. Each of these tasks detailed in the Receiver's Third 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

32. 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.

33. 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 Fourth Interim Fee Application in the amount of \$15,435.00;

- (b) That the Receiver's Retained Professionals be awarded fees incurred during the Fourth Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$65,900.54; and Hays for \$30,857.40.
- (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 TCIFA in the aggregate amount of \$135.04, are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

CONCLUSION

34. Based on the foregoing, the Receiver respectfully requests that the Court enter an order approving the Receiver's Fourth Certified Interim Fee Application for the Receiver and His Retained Professionals and authorizing the Receiver to immediately pay the fees requested in the FCIFA as follows: (1) to the Receiver in the amount of \$15,435.00; (2) to Shook Hardy & Bacon, LLC for \$65,900.54; and (3) to Hays for \$30,857.40.00.

35. 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 \$135.04.

Dated: November 17, 2023

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Poston E. Pritchett

Poston E. Pritchett
Texas Bar No. 24088258
2555 Grand Blvd.
Kansas City, MO 64108
Telephone: 816.474-6550

Facsimile: 816.421.5547
ppritchett@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 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 17th day of November, 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/ Poston E. Pritchett

Poston E. Pritchett

Exhibit A

Client: SECURITIES AND EXCHANGE COMMISSION
 Matter Number: 33206.393697
 Matter Description: SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice
 Printed: 10/04/2023
 Proforma Number: 803281
 Group ID:
 Page Number 1 of 4

Matter Billing Address Matter Status Proforma Information

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

John Lewis Jr.
 John Lewis Jr.
 01/10/2023
 Open
 USD

Through Date: 09/30/2023
 Run Date: 10/03/2023
 Proforma Status: Current
 Invoice Number: DRAFT

Matter Information Available Matter Balances

Bill Distribution: No
 E Billing Type: Randall O. Crum
 Billing Coordinator:
 Matter Type:
 Electronic Number:

Arrangement: Special
 Fee Maximum: 0
 Volume Discount: Yes
 Exception Rate: 0.00
 Fee Estimate:

BOA:
 Trust:
 Unallocated Funds:

Proforma Totals

	Hours	Fees	Hard Costs	Soft Costs	Other Charges	Total
Work Total	40.80	\$21,420.00	\$0.00	\$0.00	\$0.00	\$21,420.00
Write Up/Down	(3.20)	(1,680.00)	0.00	0.00	0.00	(1,680.00)
Adjustments	N/A	0.00	0.00	0.00	N/A	0.00
Billable Amount	37.60	19,740.00	0.00	0.00	0.00	19,740.00
Taxes						0.00
Applied Unallocated						0.00
Applied Trust						0.00
BOA						0.00
Total Bill	37.60	\$19,740.00	\$0.00	\$0.00	\$0.00	\$19,740.00

Fee Detail

Index	Work Date	Number	Timekeeper	Work Hours	Work Amount	Bill Hours	Bill Amount	Description	Task Code
41428407	07/13/2023	19690	John Lewis Jr.	1.50	\$787.50	1.50	\$787.50	Turns of status report.	SEC04
41384446	07/19/2023	19690	John Lewis Jr.	1.00	525.00	1.00	525.00	Call with [REDACTED] matters.	SEC04
41384448	07/20/2023	19690	John Lewis Jr.	1.20	630.00	1.20	630.00	Call with [REDACTED]	SEC04
41384551	07/20/2023	19690	John Lewis Jr.	1.10	577.50	1.10	577.50	Call with [REDACTED]	SEC04
41430283	07/24/2023	19690	John Lewis Jr.	1.50	787.50	1.50	787.50	Call with [REDACTED] on status of case, and Q/A.	SEC04
41404328	07/31/2023	19690	John Lewis Jr.	0.90	472.50	0.90	472.50	Analysis of issues with team including timing of establishing claims database, offensive claims/relief defendants and status conference request.	SEC04
41443113	07/31/2023	19690	John Lewis Jr.	0.60	315.00	0.60	315.00	Attention to banking and confirming authorizing wire transfers for approved compensation to BlockTrace	SEC04
41621604	08/01/2023	19690	John Lewis Jr.	0.90	472.50	0.90	472.50	Review outline of substantive elements of draft motion for status conference.	SEC04
41604563	08/03/2023	19690	John Lewis Jr.	5.00	2,625.00	5.00	2,625.00	NO charge. Attention to fee application package.	SEC04
41621641	08/15/2023	19690	John Lewis Jr.	0.70	367.50	0.70	367.50	Attention to authorizing Benvenuto wire transfer. Review and approval auctioneer agreement for Chavez personality.	SEC04
41660378	08/17/2023	19690	John Lewis Jr.	2.50	1,312.50	2.50	1,312.50	NO CHARGE - attention to fee application materials review.	SEC04
41644431	08/31/2023	19690	John Lewis Jr.	1.50	787.50	1.50	787.50	Attention to banking and reconciliations following status conference with court.	SEC04
41877120	09/13/2023	19690	John Lewis Jr.	1.40	735.00	1.40	735.00	Attention to federal income tax returns for CBT Group. Discuss questions and details with accountants.	SEC04
41876083	09/15/2023	19690	John Lewis Jr.	1.10	577.50	1.10	577.50	Attention to review and filing of Texas Franchise tax and income returns for CBT group.	SEC04
41922457	09/22/2023	19690	John Lewis Jr.	0.80	420.00	0.80	420.00	Strategic discussion with G. Hays and P. Pritchett regarding [REDACTED]	SEC04
41922454	09/25/2023	19690	John Lewis Jr.	0.80	420.00	0.80	420.00	Attention to review of results of auction of Chavez personal property, claimed auctioneer commission and related report of sale to Court.	SEC04
41922930	09/25/2023	19690	John Lewis Jr.	0.60	315.00	0.60	315.00	Exchanges with team regarding [REDACTED]	SEC04
40954917	07/11/2023	19690	John Lewis Jr.	1.10	577.50	1.10	577.50	Call with L. Fern regarding [REDACTED]	SEC05
41430254	07/14/2023	19690	John Lewis Jr.	1.10	577.50	1.10	577.50	Turns of status report.	SEC05
40952986	07/10/2023	19690	John Lewis Jr.	2.50	1,312.50	2.50	1,312.50	Attention to Blocktrace [REDACTED]	SEC10
40931462	07/03/2023	19690	John Lewis Jr.	1.50	787.50	1.50	787.50	Interim Report drafting	SEC11
40931862	07/06/2023	19690	John Lewis Jr.	4.50	2,362.50	2.50	1,312.50	Revisions to status report draft. Discuss with J. Daniels regarding ongoing BlockTrace work.	SEC11

Client: SECURITIES AND EXCHANGE COMMISSION
 Matter Number: 33206.393697
 Matter Description: SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice

Printed: 10/04/2023
 Proforma Number: 803281
 Group ID:

Page Number
 3 of 4

Index	Work Date	Number	Timekeeper	Work Hours	Work Amount	Bill Hours	Bill Amount	Description	Task Code
40952970	07/07/2023	19690	John Lewis Jr.	2.80	1,470.00	2.80	1,470.00	Turns of status report with focus on [REDACTED]	SEC11
41093029	07/18/2023	19690	John Lewis Jr.	2.50	1,312.50	1.30	682.50	Continued turns of 4th report and exh bits.	SEC11
41621592	08/30/2023	19690	John Lewis Jr.	0.60	315.00	0.60	315.00	Prep call with P. Pritchett in anticipation of status conference. Skim prior reports.	SEC13
41661334	08/30/2023	19690	John Lewis Jr.	1.10	577.50	1.10	577.50	Prep call with P. Pritchett for status conference. Appear at status conference.	SEC13

Total 40.80 \$21,420.00 37.60 \$19,740.00

Timekeeper Summary

Number	Name	Title	Work Hours	Work Amount	Bill Hours	Bill Rate	Bill Amount
19690	John Lewis Jr.	Partner	40.80	\$21,420.00	37.60	\$525.00	\$19,740.00
Total			40.80	\$21,420.00	37.60		\$19,740.00

Billing & Payment History

(Includes all outstanding invoices and those invoices paid during the past 12 months.)

Invoice Number	Invoice Date	Invoice Amount	Amount Paid	Last Pay Date	A/R Write-offs	Balance Due
2275937	01/24/2023	84,315.00	(84,315.00)	09/01/2023	0.00	0.00
3008158	04/27/2023	46,672.50	(46,672.50)	09/01/2023	0.00	0.00
3021399	08/09/2023	37,695.00	(16,275.47)	09/01/2023	0.00	21,419.53
Total		\$168,682.50	(\$147,262.97)		\$0.00	\$21,419.53

Matter Billing Instructions

Client Billing Instructions

Client: SECURITIES AND EXCHANGE COMMISSION
Matter Number: 33206.393697
Matter Description: SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice
Printed: 10/04/2023
Proforma Number: 803281
Group ID:
Page Number 4 of 4

Proforma Billing Instructions

- Final Bill
- Bill Fees and Costs
- Bill Fees Only
- Bill Costs Only
- Do Not Bill
- Close Matter

Exhibit B

Client: SECURITIES AND EXCHANGE COMMISSION
Matter Number: 33206.389768
Matter Description: Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.
Printed: 10/04/2023
Proforma Number: 803280
Group ID:
Page Number 1 of 9

Matter Billing Address	Matter Status	Proforma Information
SHOOK HARDY AND BACON JOHN LEWIS, JR, RECEIVER 600 TRAVIS ST, SUITE 3400 HOUSTON, TX 77002-2926	John Lewis Jr. John Lewis Jr. 10/05/2022 Open USD	Through Date: 09/30/2023 Run Date: 10/03/2023 Proforma Status: Current Invoice Number: DRAFT

Matter Information	Matter Fee Arrangements	Available Matter Balances
Bill Distribution: E Billing Type: Billing Coordinator: Matter Type: Electronic Number:	Arrangement: Fee Maximum: Volume Discount: Exception Rate: Fee Estimate:	BOA: Trust: Unallocated Funds:
No Randall O. Crum	Special 0 Yes 0.00	0.00 0.00 0.00

Proforma Totals

	Hours	Fees	Hard Costs	Soft Costs	Other Charges	Total
Work Total	168.20	\$70,138.00	\$3,812.18	\$135.04	\$0.00	\$74,085.22
Write Up/Down	(3.10)	(1,227.50)	0.00	0.00	0.00	(1,227.50)
Adjustments	N/A	0.00	0.00	0.00	N/A	0.00
Billable Amount	165.10	68,910.50	3,812.18	135.04	0.00	72,857.72
Taxes						0.00
Applied Unallocated						0.00
Applied Trust						0.00
BOA						0.00
Total Bill	165.10	\$68,910.50	\$3,812.18	\$135.04	\$0.00	\$72,857.72

Fee Detail

Index	Work Date	Number	Timekeeper	Work Hours	Work Amount	Bill Hours	Bill Amount	Description	Task Code
41396096	07/06/2023	19768	Poston E. Pritchett	0.20	\$85.00	0.20	\$85.00	Review new offer on Mack Washington property.	SEC01
41396202	07/11/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Review communications between auction house and attorney regarding additional Chavez property.	SEC01
41088994	07/17/2023	19807	Caroline M. Gieser	0.40	170.00	0.40	170.00	Attend team meeting regarding items outstanding for 4th report of the receiver.	SEC01
41449389	07/31/2023	19807	Caroline M. Gieser	0.60	255.00	0.60	255.00	Attend team call regarding additional relief defendants to add.	SEC01
4145286	08/01/2023	12438	Arlen L. Tanner	0.60	255.00	0.60	255.00	Verify continued Salesforce data integrity and access.	SEC01
41465363	08/03/2023	12438	Arlen L. Tanner	0.10	42.50	0.10	42.50	Communicate with Salesforce regarding issues with access.	SEC01
41465364	08/03/2023	12438	Arlen L. Tanner	0.20	85.00	0.20	85.00	Continue verification of Salesforce data integrity and access.	SEC01
41506230	08/14/2023	20373	Stacey A. Mitchell	0.20	36.00	0.20	36.00	Yara Rashad (CHI): Research to obtain docket and [REDACTED]	SEC01
41947297	09/13/2023	19768	Poston E. Pritchett	0.30	127.50	0.30	127.50	Confer with Blocktrace regarding possible further work and expected recovery.	SEC01
41396161	07/06/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Review compliance with disposition of Mack Washington property.	SEC02
41396169	07/10/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Further attention to disposition of Mack Washington property.	SEC02
41447429	07/28/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Revise motion for sale of real property located at 0 Mack Washington in accordance with revisions to latest contract.	SEC02
41946804	09/06/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Confer with Webster's auction.	SEC02
41947077	09/07/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Follow up with realtor regarding disposition of Mack Washington property.	SEC02
41947274	09/25/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Review report from auctioneer regarding Chavez personal property.	SEC02
41947275	09/25/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Review Mack Washington lien release.	SEC02
41442825	07/03/2023	19744	Yara K. Rashad	1.00	425.00	1.00	425.00	Review and analyze listing agreement for sale of real property and compare with contract for sale of real property.	SEC04
41447613	07/03/2023	19744	Yara K. Rashad	1.00	425.00	1.00	425.00	Draft subpoena for production of documents and deposition [REDACTED]	SEC04
41449506	07/03/2023	19744	Yara K. Rashad	0.80	340.00	0.80	340.00	Revise contractual provisions in contract for sale of real property.	SEC04
41450186	07/03/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Draft subpoena to [REDACTED] for production of documents and deposition testimony.	SEC04
41450247	07/03/2023	19744	Yara K. Rashad	1.80	765.00	1.80	765.00	Draft subpoena to [REDACTED] requesting production of documents and information relevant to litigation.	SEC04
41450176	07/06/2023	19744	Yara K. Rashad	2.10	892.50	2.10	892.50	Draft motion for sale of Mack Washington property per Receivership Order.	SEC04
41442871	07/07/2023	19744	Yara K. Rashad	0.70	297.50	0.70	297.50	Review and analyze draft of fourth interim status report and correspond with P. Pritchett and J. Lewis regarding same.	SEC04
41450229	07/07/2023	19744	Yara K. Rashad	2.90	1,232.50	2.90	1,232.50	Research [REDACTED]	SEC04

Client: SECURITIES AND EXCHANGE COMMISSION
 Matter Number: 33206.389768
 Matter Description: Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.
 Printed: 10/04/2023
 Proforma Number: 803280
 Group ID:

Index	Work Date	Number	Timekeeper	Work Hours	Work Amount	Bill Hours	Bill Amount	Description	Task Code
41451214	07/07/2023	19744	Yara K. Rashad	1.70	722.50	1.70	722.50	Research procedural requirements for motion for sale of real property to prepare for sale of Mack Washington property.	SEC04
41451216	07/07/2023	19744	Yara K. Rashad	0.40	170.00	0.40	170.00	Call with broker for Mack Washington property to discuss buyer's stipulations to the contract for sale of real property.	SEC04
41451824	07/07/2023	19744	Yara K. Rashad	2.70	1,147.50	2.70	1,147.50	Research [REDACTED]	SEC04
41448800	07/09/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Draft demand letter to [REDACTED] requesting documents and information as required by the duties of the receiver.	SEC04
41448840	07/09/2023	19744	Yara K. Rashad	1.40	595.00	1.40	595.00	Create spreadsheet maintaining running task list of all receivership activity and upcoming deadlines.	SEC04
41451217	07/09/2023	19744	Yara K. Rashad	1.60	680.00	1.60	680.00	Draft demand letter to [REDACTED] requesting documents and information as required by the duties of the receiver.	SEC04
41448826	07/10/2023	19744	Yara K. Rashad	2.20	935.00	2.20	935.00	Review and analyze filings in receivership cases [REDACTED]	SEC04
41448845	07/10/2023	19744	Yara K. Rashad	0.90	382.50	0.90	382.50	Revise running task list spreadsheet to include assets within receivership estate.	SEC04
41448873	07/10/2023	19744	Yara K. Rashad	0.70	297.50	0.70	297.50	Meet with P. Pritchett, G. Hayes, S. Askue, and J. Lewis to discuss case status and ongoing tasks.	SEC04
41396167	07/10/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Summarize status of discrete action items from status call and responsibilities for same.	SEC04
41396175	07/10/2023	19768	Poston E. Pritchett	0.50	212.50	0.50	212.50	Weekly status call.	SEC04
41396180	07/10/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Review inquiry from [REDACTED] counsel.	SEC04
41442838	07/11/2023	19744	Yara K. Rashad	0.70	297.50	0.70	297.50	Correspond with broker regarding proposed revisions to contract for sale of real property located at Mack Washington.	SEC04
41450901	07/11/2023	19744	Yara K. Rashad	1.00	425.00	1.00	425.00	Call with Poston.	SEC04
41396193	07/11/2023	19768	Poston E. Pritchett	0.40	170.00	0.40	170.00	Attention to status report.	SEC04
41075051	07/11/2023	20093	Cesar A. Udave	0.30	127.50	0.30	127.50	Correspond with internal team regarding documentation [REDACTED]	SEC04
41442802	07/13/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Draft BlockTrace fee application.	SEC04
41396154	07/17/2023	19768	Poston E. Pritchett	0.30	127.50	0.30	127.50	Confer with Y. Rashad regarding status of specific action items from status call.	SEC04
41396216	07/18/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Respond to inquiry from Paul Flack.	SEC04
41396217	07/18/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Respond to inquiry from attorney for G. Benvenuto.	SEC04
41451240	07/19/2023	19744	Yara K. Rashad	0.80	340.00	0.80	340.00	Correspond with broker for Mack Washington property regarding buyer's revisions to offer period in contract and correspond with J. Lewis and P. Pritchett regarding same.	SEC04
41395910	07/19/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Response to P. Flack regarding motion for bank account access.	SEC04
41396089	07/20/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Review proposed motion and order from P. Chavez.	SEC04
41447278	07/24/2023	19744	Yara K. Rashad	0.70	297.50	0.70	297.50	Revise demand letters to [REDACTED]	SEC04
41395971	07/24/2023	19768	Poston E. Pritchett	1.00	425.00	1.00	425.00	Prepare for and participate in call with [REDACTED]	SEC04

Client: SECURITIES AND EXCHANGE COMMISSION
 Matter Number: 33206.389768
 Matter Description: Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.
 Printed: 10/04/2023
 Proforma Number: 803280
 Group ID:

Index	Work Date	Number	Timekeeper	Work Hours	Work Amount	Bill Hours	Bill Amount	Description	Task Code
41396232	07/25/2023	19768	Poston E. Pritchett	1.50	637.50	1.50	637.50	Continue strategy for increasing value of estate as efficiently as possible.	SEC04
41447631	07/31/2023	19744	Yara K. Rashad	1.40	595.00	1.40	595.00	Draft demand letter to [REDACTED] requesting production of documents and financial information.	SEC04
41412355	07/31/2023	19768	Poston E. Pritchett	0.50	212.50	0.50	212.50	Participate in weekly strategy call.	SEC04
41654627	08/01/2023	19744	Yara K. Rashad	0.50	212.50	0.50	212.50	Correspond with broker regarding executed contract for Mack Washington property.	SEC04
41656334	08/01/2023	19744	Yara K. Rashad	2.90	1,232.50	2.90	1,232.50	Draft section in motion for sale of real property on the executed contract for the Mack Washington property.	SEC04
41656671	08/02/2023	19744	Yara K. Rashad	5.00	2,125.00	5.00	2,125.00	Review and analyze records and documentation for [REDACTED]	SEC04
41656623	08/03/2023	19744	Yara K. Rashad	1.60	680.00	1.60	680.00	Revise motion for sale of real property to include information on fair market value and anticipated proceeds.	SEC04
41656626	08/03/2023	19744	Yara K. Rashad	0.30	127.50	0.30	127.50	Correspond with real estate broker and J. Lewis regarding sale of Mack Washington property in preparation for sale and court order requesting same.	SEC04
41656665	08/03/2023	19744	Yara K. Rashad	1.40	595.00	1.40	595.00	Review and analyze documents and records for [REDACTED]	SEC04
41654498	08/04/2023	19744	Yara K. Rashad	2.60	1,105.00	2.60	1,105.00	Revise motion for sale of real property per edits from J. Lewis and P. Pritchett.	SEC04
41656684	08/04/2023	19744	Yara K. Rashad	2.10	892.50	2.10	892.50	Review recorded interview of [REDACTED]	SEC04
41656693	08/04/2023	19744	Yara K. Rashad	3.00	1,275.00	3.00	1,275.00	Draft summary of interview of [REDACTED]	SEC04
41657021	08/04/2023	19744	Yara K. Rashad	0.30	127.50	0.30	127.50	Correspond with broker at Mark Dimas regarding preliminary settlement statement as needed to include in motion for sale of real property.	SEC04
41657297	08/04/2023	19744	Yara K. Rashad	0.30	127.50	0.30	127.50	Correspond with counsel for [REDACTED]	SEC04
41666145	08/07/2023	19744	Yara K. Rashad	1.60	680.00	1.60	680.00	Review video of [REDACTED]	SEC04
41666423	08/07/2023	19744	Yara K. Rashad	1.50	637.50	1.50	637.50	Revise interview summary for [REDACTED]	SEC04
41645548	08/07/2023	19768	Poston E. Pritchett	0.30	127.50	0.30	127.50	Confer with [REDACTED]	SEC04
41656843	08/10/2023	19744	Yara K. Rashad	2.90	1,232.50	2.90	1,232.50	Review and analyze case law in [REDACTED]	SEC04
41665699	08/14/2023	19744	Yara K. Rashad	1.20	510.00	1.20	510.00	Draft summary of research on Texas [REDACTED]	SEC04
41646128	08/15/2023	19768	Poston E. Pritchett	2.50	1,062.50	2.50	1,062.50	[NO BILL] Fee application.	SEC04

Index	Work Date	Number	Timekeeper	Work Hours	Work Amount	Bill Hours	Bill Amount	Description	Task Code
41659297	08/17/2023	19744	Yara K. Rashad	2.40	1,020.00	2.40	1,020.00	Review and analyze deposition of [REDACTED] to be included as factual support in [REDACTED]	SEC04
41659263	08/24/2023	19744	Yara K. Rashad	2.90	1,232.50	2.90	1,232.50	Draft section in [REDACTED]	SEC04
41660620	08/24/2023	19744	Yara K. Rashad	2.00	850.00	2.00	850.00	Draft section in [REDACTED]	SEC04
41654001	08/28/2023	19744	Yara K. Rashad	1.70	722.50	1.70	722.50	Draft introduction section in [REDACTED]	SEC04
41645834	08/28/2023	19768	Poston E. Pritchett	0.40	170.00	0.40	170.00	Review status of various outstanding items.	SEC04
41645851	08/28/2023	19768	Poston E. Pritchett	0.30	127.50	0.30	127.50	Confer with [REDACTED]	SEC04
41659694	08/29/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Draft preliminary statement [REDACTED]	SEC04
41659695	08/29/2023	19744	Yara K. Rashad	1.30	552.50	1.30	552.50	Draft legal standard section in [REDACTED]	SEC04
41643826	08/29/2023	19768	Poston E. Pritchett	1.50	637.50	1.50	637.50	Prepare for court ordered status conference.	SEC04
41654605	08/30/2023	19744	Yara K. Rashad	3.00	1,275.00	3.00	1,275.00	Draft argument section to [REDACTED]	SEC04
41660183	08/30/2023	19744	Yara K. Rashad	2.90	1,232.50	2.90	1,232.50	Draft section [REDACTED]	SEC04
41660184	08/30/2023	19744	Yara K. Rashad	2.90	1,232.50	2.90	1,232.50	Draft section in [REDACTED]	SEC04
41644718	08/30/2023	19768	Poston E. Pritchett	0.70	297.50	0.70	297.50	Prepare and participate in court ordered status conference.	SEC04
41660214	08/31/2023	19744	Yara K. Rashad	3.90	1,657.50	3.90	1,657.50	Draft section in [REDACTED]	SEC04
41660299	08/31/2023	19744	Yara K. Rashad	1.30	552.50	1.30	552.50	Revise argument section in [REDACTED]	SEC04
41660440	08/31/2023	19744	Yara K. Rashad	2.00	850.00	2.00	850.00	Revise section on [REDACTED]	SEC04
41660603	08/31/2023	19744	Yara K. Rashad	1.80	765.00	1.80	765.00	Revise section in [REDACTED]	SEC04
41978030	09/05/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Review receivership order and case filings to determine [REDACTED]	SEC04
41978032	09/05/2023	19744	Yara K. Rashad	2.60	1,105.00	2.60	1,105.00	Revise motion [REDACTED]	SEC04
41986144	09/06/2023	19744	Yara K. Rashad	1.30	552.50	1.30	552.50	Revise [REDACTED]	SEC04
41947288	09/11/2023	19768	Poston E. Pritchett	0.40	170.00	0.40	170.00	Participate in status call regarding outstanding action items.	SEC04
41978078	09/19/2023	19744	Yara K. Rashad	0.40	170.00	0.40	170.00	Draft informational blurb regarding offshoot scam to be posted to the Receiver's website in response to claims reported to the SEC.	SEC04
41947302	09/19/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Response to inquiry from [REDACTED]	SEC04
41947218	09/21/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Analyze P. Flack revisions to order on motion to compel.	SEC04
41947116	09/22/2023	19768	Poston E. Pritchett	0.40	170.00	0.40	170.00	Strategy discussion with J. Lewis.	SEC04
41947280	09/22/2023	19768	Poston E. Pritchett	0.30	127.50	0.30	127.50	Call with victim.	SEC04
41947031	09/27/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Confer with [REDACTED]	SEC04

Client: SECURITIES AND EXCHANGE COMMISSION
 Matter Number: 33206.389768
 Matter Description: Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.
 Printed: 10/04/2023
 Proforma Number: 803280
 Group ID:

Index	Work Date	Number	Timekeeper	Work Hours	Work Amount	Bill Hours	Bill Amount	Description	Task Code
41947041	09/27/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Further attention to file based on call [REDACTED]	SEC04
41981171	09/28/2023	19744	Yara K. Rashad	1.80	765.00	1.80	765.00	Review and analyze case file to determine scope and nature of [REDACTED]	SEC04
41395909	07/19/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Review claim submission to court.	SEC05
41450483	07/31/2023	19807	Caroline M. Gieser	0.50	212.50	0.50	212.50	Evaluate subpoenas issued and responses still needed.	SEC05
41880181	09/11/2023	19807	Caroline M. Gieser	0.40	170.00	0.40	170.00	Attend team meeting regarding claims management process.	SEC05
41088983	07/17/2023	19807	Caroline M. Gieser	1.80	765.00	1.80	765.00	Revise fourth report of the receiver.	SEC07
41928113	09/25/2023	19807	Caroline M. Gieser	0.10	42.50	0.10	42.50	Develop strategy for [REDACTED]	SEC07
41503684	08/09/2023	16964	Levi W. Percy	0.40	72.00	0.40	72.00	Provide matter-specific database, document and case team support.	SEC10
41396189	07/11/2023	19768	Poston E. Pritchett	0.70	297.50	0.70	297.50	Attention to claims processing.	SEC11
414447483	07/12/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Draft section in fourth interim status report containing status update and discussion of ongoing projects as required by receivership order.	SEC11
41451940	07/12/2023	19744	Yara K. Rashad	2.00	850.00	2.00	850.00	Revise section in fourth interim status report regarding asset administration and disposition.	SEC11
41442844	07/12/2023	19744	Yara K. Rashad	3.80	1,615.00	2.20	935.00	Revise section in fourth interim status report on crypto wallet tracing.	SEC11
41447692	07/13/2023	19744	Yara K. Rashad	2.20	935.00	2.20	935.00	Revise introduction section in fourth interim status report.	SEC11
41452563	07/13/2023	19744	Yara K. Rashad	2.20	935.00	2.20	935.00	Revise background section in fourth interim status report.	SEC11
41447291	07/16/2023	19744	Yara K. Rashad	2.30	977.50	2.30	977.50	Revise fourth interim status report per edits from J. Lewis.	SEC11
41447362	07/16/2023	19744	Yara K. Rashad	1.20	510.00	1.20	510.00	Revise BlockTrace fee application per edits from G. Hayes.	SEC11
41447487	07/16/2023	19744	Yara K. Rashad	1.80	765.00	1.80	765.00	Revise application for fees incurred by BlockTrace related to cryptocurrency wallet tracing.	SEC11
41442843	07/17/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Revise fourth interim status report per edits from C. Geiser.	SEC11
41446761	07/17/2023	19744	Yara K. Rashad	1.90	807.50	1.90	807.50	Revise fourth interim status report per edits from G. Hayes and J. Lewis.	SEC11
41396155	07/17/2023	19768	Poston E. Pritchett	0.30	127.50	0.30	127.50	Revise status report.	SEC11
41396211	07/18/2023	19768	Poston E. Pritchett	0.30	127.50	0.30	127.50	Revise current status report.	SEC11
41396248	07/18/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Identify needed information to finish status report.	SEC11
41395895	07/19/2023	19768	Poston E. Pritchett	0.50	212.50	0.50	212.50	Attention to status report and exhibits.	SEC11
41395696	07/05/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Incorporate revisions to [REDACTED]	SEC12
41396101	07/07/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Finalize demand letter for [REDACTED]	SEC12
41395973	07/24/2023	19768	Poston E. Pritchett	0.30	127.50	0.30	127.50	Consider strategy for [REDACTED]	SEC12
41395987	07/24/2023	19768	Poston E. Pritchett	0.20	85.00	0.20	85.00	Confer with [REDACTED]	SEC12
41412356	07/31/2023	19768	Poston E. Pritchett	0.60	255.00	0.60	255.00	Consider further strategy for [REDACTED]	SEC12
41440995	07/12/2023	19164	Mia K. Fleming	3.00	1,095.00	1.50	547.50	Perform searches regarding Salesforce data.	SEC13
41440962	07/20/2023	19164	Mia K. Fleming	1.00	365.00	1.00	365.00	Organization of recent case pleadings to be added to Receiver's Website.	SEC13
41661629	08/07/2023	19164	Mia K. Fleming	2.50	912.50	2.50	912.50	Perform searches regarding [REDACTED]	SEC13
41661170	08/09/2023	19164	Mia K. Fleming	2.50	912.50	2.50	912.50	Perform searches regarding [REDACTED]	SEC13
41644475	08/30/2023	19768	Poston E. Pritchett	0.40	170.00	0.40	170.00	Review [REDACTED]	SEC13

Client: SECURITIES AND EXCHANGE COMMISSION
 Matter Number: 33206.389768
 Matter Description: Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.
 Printed: 10/04/2023
 Proforma Number: 803280
 Group ID:

Index	Work Date	Number	Timekeeper	Work Hours	Work Amount	Bill Hours	Bill Amount	Description	Task Code
41644733	08/30/2023	19768	Poston E. Pritchett	1.00	425.00	1.00	425.00	Review motion to compel in advance of upcoming hearing.	SEC13
41644216	08/31/2023	19768	Poston E. Pritchett	1.50	637.50	1.50	637.50	Further review of motion to compel and other pending motions in advance of status call.	SEC13
41947282	09/18/2023	19768	Poston E. Pritchett	0.60	255.00	0.60	255.00	Attention to motion to compel.	SEC13
41966236	09/19/2023	19164	Mia K. Fleming	2.50	912.50	2.50	912.50	Preparation of materials to be uploaded to the Receiver's Website.	SEC13
41963592	09/20/2023	19164	Mia K. Fleming	2.00	730.00	2.00	730.00	Continued preparation of materials to be uploaded to the Receiver's Website.	SEC13
41963593	09/21/2023	19164	Mia K. Fleming	3.00	1,095.00	3.00	1,095.00	Continued preparation of materials to be uploaded to the Receiver's Website.	SEC13
41963863	09/25/2023	19164	Mia K. Fleming	0.50	182.50	0.50	182.50	Attendance at team strategy meeting.	SEC13
41963591	09/28/2023	19164	Mia K. Fleming	3.00	1,095.00	3.00	1,095.00	Perform searches regarding [REDACTED].	SEC13
Total				168.20	\$70,138.00	165.10	\$68,910.50		

Timekeeper Summary

Number	Name	Title	Work Hours	Work Amount	Bill Hours	Bill Rate	Bill Amount
12438	Arlen L. Tanner	Counsel	0.90	\$382.50	0.90	\$425.00	\$382.50
19807	Caroline M. Gieser	Associate	3.80	1,615.00	3.80	425.00	1,615.00
20093	Cesar A. Udave	Associate	0.30	127.50	0.30	425.00	127.50
19768	Poston E. Pritchett	Associate	22.10	9,392.50	22.10	425.00	9,392.50
19744	Yara K. Rashad	Associate	120.50	51,212.50	118.90	425.00	50,532.50
19164	Mia K. Fleming	Paralegal	20.00	7,300.00	18.50	365.00	6,752.50
16964	Levi W. Percy	Litigation Support	0.40	72.00	0.40	180.00	72.00
20373	Stacey A. Mitchell	Litigation Support	0.20	36.00	0.20	180.00	36.00
Total			168.20	\$70,138.00	165.10		\$68,910.50

Hard Cost Detail

Index	Date	Timekeeper	Description	Vendor Invoice	Amount	Cost Code	E Code	Cost Type 1
12666352	06/30/2023	Valeria C. Muniz Hayes	Gulfstream Legal Group LLC - Litigation Support Group LLC, Relatedly managed services and electronic data collection invoice for June 2023, related to SEC v. Mauricio Chavez, et al.	02-23670	\$1,295.70	1019	E118	
12702211	08/31/2023	Valeria C. Muniz Hayes	Gulfstream Legal Group LLC - Litigation Support Group LLC, Relatedly managed services and electronic data collection invoice for August 2023, related to SEC vs. Mauricio Chavez, et al.	02-24108	1,295.78	1019	E118	
12667250	07/31/2023	Valeria C. Muniz Hayes	Gulfstream Legal Group LLC - Litigation Support Group LLC, Relatedly managed services and electronic data collection invoice for July 2023, related to SEC vs. Mauricio Chavez, et al.	02-23910	1,220.70	1019	E118	

Client: SECURITIES AND EXCHANGE COMMISSION
 Matter Number: 33206.389768
 Matter Description: Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.

Printed: 10/04/2023
 Proforma Number: 803280
 Group ID:

Page Number
 8 of 9

Index	Date	Timekeeper	Description	Vendor Invoice	Amount	Cost Code	E Code	Cost Type 1
					\$3,812.18			
Total								

Soft Cost Detail								
Index	Date	Timekeeper	Description	Quantity	Amount	Cost Code	E Code	Cost Type 1
12679186	06/06/2023	John Lewis Jr.	TLO	1.00	\$35.00	4445	E106	
12686552	08/10/2023	John Lewis Jr.	Postage	1.00	19.92	4365	E108	
12686549	08/22/2023	John Lewis Jr.	Postage	1.00	40.80	4365	E108	
12686550	08/27/2023	John Lewis Jr.	Postage	1.00	29.88	4365	E108	
12686551	08/27/2023	John Lewis Jr.	Postage	1.00	4.44	4365	E108	
12679166	08/29/2023	John Lewis Jr.	TLO - (05/16/2023).	1.00	5.00	4445	E106	
					\$135.04			
Total								

Billing & Payment History
 (Includes all outstanding invoices and those invoices paid during the past 12 months.)

Invoice Number	Invoice Date	Invoice Amount	Amount Paid	Last Pay Date	A/R Write-offs	Balance Due
2275936	01/24/2023	279,771.52	(279,771.52)	09/01/2023	0.00	0.00
3008735	04/30/2023	346,828.64	(346,828.64)	09/01/2023	0.00	0.00
3021400	08/09/2023	205,502.38	(141,654.52)	09/01/2023	0.00	63,847.86
Total					\$0.00	\$63,847.86

Matter Billing Instructions

Client: SECURITIES AND EXCHANGE COMMISSION
Matter Number: 33206.389768
Matter Description: Lewis, John, Jr., Receiver - SEC vs. Mauricio Chavez, et al.
Printed: 10/04/2023
Proforma Number: 803280
Group ID:
Page Number
9 of 9

Proforma Billing Instructions

[Empty rectangular box for Proforma Billing Instructions]

- Final Bill
- Bill Fees and Costs
- Bill Fees Only
- Bill Costs Only
- Do Not Bill
- Close Matter

Exhibit C

Hays Financial Consulting, LLC

2964 Peachtree Road
 Suite 555
 Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 7/1/2023 to 9/30/2023

October 11, 2023

Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting	4.20	1,185.00
Asset Analysis & Recovery	0.70	193.20
Business Analysis	2.30	486.40
Case Administration	6.90	2,373.40
Claims Administration & Objections	1.30	358.80
Communications and Reporting	0.70	253.40
Data Analysis	0.40	68.00
Fee / Employment Applications & Objection	11.40	NO CHARGE
Forensic Accounting	0.70	253.40
Litigation Consulting	0.40	110.40
Status Reports	2.80	979.20
Tax Issues	88.30	24,491.20
	<hr/>	<hr/>
For professional services rendered	120.10	\$30,752.40
 Additional Charges :		
Tax Return Filing Fees		105.00
		<hr/>
Total costs		\$105.00
		<hr/>
Total amount of this bill		\$30,857.40
		<hr/> <hr/>

Hays Financial Consulting, LLC

2964 Peachtree Road
 Suite 555
 Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 7/1/2023 to 9/30/2023

October 11, 2023

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
Dwaine A. Butler	3.20	340.00
	106.25/hr	
James R. Jennings, CPA	76.40	21,086.40
	276.00/hr	
S. Gregory Hays, CTP, CIRA	13.30	4,054.40
	304.84/hr	
Scott S. Askue	27.20	5,271.60
	193.81/hr	
For professional services rendered	120.10	\$30,752.40
Additional Charges :		
Tax Return Filing Fees		105.00
Total costs		\$105.00
Total amount of this bill		\$30,857.40

2964 Peachtree Road
 Suite 555
 Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 7/1/2023 to 9/30/2023

October 11, 2023

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Accounting</u>			
7/17/2023	SSA		
		0.20	55.20
		276.00/hr	
	SSA	1.90	524.40
		276.00/hr	
7/19/2023	SSA	0.90	248.40
		276.00/hr	
8/15/2023	SSA	0.30	82.80
		276.00/hr	
8/29/2023	SSA	0.60	165.60
		276.00/hr	
8/31/2023	SGH	0.30	108.60
		362.00/hr	
	Subtotal	4.20	1,185.00
<u>Asset Analysis & Recovery</u>			
7/26/2023	SSA	0.70	193.20
		276.00/hr	
	Subtotal	0.70	193.20
<u>Business Analysis</u>			
7/12/2023	SSA	0.70	193.20
		276.00/hr	
8/11/2023	SSA	0.20	55.20
		276.00/hr	
9/21/2023	DAB	1.40	238.00
		170.00/hr	
	Subtotal	2.30	486.40
<u>Case Administration</u>			
7/5/2023	DAB	0.20	34.00
		170.00/hr	
7/10/2023	SSA	0.50	138.00
		276.00/hr	

SEC v CryptoFX

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
7/10/2023	SGH Weekly Receiver Team conference call.	0.50 362.00/hr	181.00
7/11/2023	SGH Reviewed and responded to wide variety of emails. Reviewed prior receiver reports for information on total estimated claims and number of creditors. Responded to email regarding Blocktrace fee application. Responded to email regarding Salesforce data. Emails to the Receiver. Emails to James Daniels of Blocktrace.	0.60 362.00/hr	217.20
7/12/2023	SGH Corresponded with Receiver and Blocktrace.	0.20 362.00/hr	72.40
7/14/2023	SGH Reviewed Blocktrace fee application and email to Receiver and Yara regarding suggested additions and getting BlockTrace paid to continue analysis efforts. Email to James Daniels.	0.40 362.00/hr	144.80
7/16/2023	SGH Drafted email to Receiver regarding pending matters.	0.20 362.00/hr	72.40
7/18/2023	SGH Emails with Receiver regarding the Blocktrace fee application, the Receiver's 4th Interim Report, and other matters. Emails with James Daniels.	0.40 362.00/hr	144.80
7/28/2023	SGH Emails regarding status and approval of Blocktrace fees. Email with James Daniels regarding getting started working on case.	0.10 362.00/hr	36.20
7/31/2023	SGH Participated in Zoom call with Receiver team.	0.60 362.00/hr	217.20
8/8/2023	SGH Reviewed docket activity.	0.20 362.00/hr	72.40
8/9/2023	SGH Reviewed emails regarding pending matters.	0.20 362.00/hr	72.40
8/10/2023	SGH Reviewed docket and email to Receiver.	0.20 362.00/hr	72.40
8/11/2023	SGH Research regarding pending matters before the court. Emails to Receiver and Poston Pritchett. Call to Sonila Themeli regarding same.	0.40 362.00/hr	144.80
8/18/2023	SGH Reviewed docket activity and email to Receiver regarding required update.	0.20 362.00/hr	72.40
8/27/2023	SGH Email to the Receiver and Carol Hahn regarding pending matters.	0.20 362.00/hr	72.40
8/29/2023	SGH Email from the Receiver regarding status conference. Reviewed analysis of fees by case and drafted email to Receiver and Poston Pritchett regarding allocation of fees. Reviewed settlement agreement with defendants and downloaded for web site.	0.50 362.00/hr	181.00
8/30/2023	SGH Participated in status conference.	0.30 362.00/hr	108.60
9/22/2023	SGH Conference call with Receiver, Poston Pritchett, and Scott Askue regarding pending matter and recoveries. Discussed claim administration and possible litigation.	0.50 362.00/hr	181.00
	SSA Conference call with Receiver, Poston Pritchett, and Greg Hays regarding case matters, pending issues and next steps in case.	0.50 276.00/hr	138.00
	Subtotal	6.90	2,373.40

Claims Administration & Objections

7/12/2023	SSA Drafted email to receiver team regarding status of claims process. Researched and drafted email regarding notice issues and contact information for same.	1.30 276.00/hr	358.80
-----------	---	-------------------	--------

SEC v CryptoFX

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
	Subtotal	1.30	358.80
<u>Communications and Reporting</u>			
7/20/2023	SGH Drafted email regarding web traffic and updated web site by down loading pleadings for creditors.	0.40 362.00/hr	144.80
7/25/2023	SGH Reviewed report of web activity. Email to Receiver regarding same.	0.30 362.00/hr	108.60
	Subtotal	0.70	253.40
<u>Data Analysis</u>			
9/26/2023	DAB Researched Relativity portal for potential recoveries.	0.40 170.00/hr	68.00
	Subtotal	0.40	68.00
<u>Fee / Employment Applications & Objection</u>			
7/5/2023	DAB Reviewed and edited time entries in preparation of Accountants Fee Application.	0.60 170.00/hr	NO CHARGE
7/14/2023	SGH Reviewed pre-bill for Second Quarter fee application.	0.50 362.00/hr	NO CHARGE
	SSA Reviewed and edited fee invoice for the quarter ending 6/30/2023.	4.50 276.00/hr	NO CHARGE
7/15/2023	DAB Reviewed and edited time entries in preparation of Accountant's invoice.	0.60 170.00/hr	NO CHARGE
7/26/2023	SGH Email to Receiver regarding payment of fees and filing second quarter fee statement with SEC.	0.20 362.00/hr	NO CHARGE
8/3/2023	SGH Reviewed and edited the draft of the HFC fee application. Corresponded with Receiver and Poston Pritchett regarding filing the fee application and order ASAP.	1.40 362.00/hr	NO CHARGE
	SSA Drafted fee application.	3.60 276.00/hr	NO CHARGE
	Subtotal	11.40	0.00
<u>Forensic Accounting</u>			
7/6/2023	SGH Responded to emails from James Daniels of Blocktrace.	0.20 362.00/hr	72.40
7/17/2023	SGH Email to James Daniels of Blocktrace.	0.10 362.00/hr	36.20
9/4/2023	SGH Drafted email to James Daniels and Kevin Duberstein regarding the status of crypto tracing and next steps. Email to Poston Pritchett regarding subpoenas.	0.40 362.00/hr	144.80
	Subtotal	0.70	253.40
<u>Litigation Consulting</u>			
7/11/2023	SSA Reviewed and verified content of letter to Angelica Vargas.	0.40 276.00/hr	110.40
	Subtotal	0.40	110.40

SEC v CryptoFX

Page 4

			<u>Hrs/Rate</u>	<u>Amount</u>
<u>Status Reports</u>				
7/10/2023	SGH	Edited copy of 4th Interim Report and email to parties regarding same with suggested changes.	0.40 362.00/hr	144.80
7/13/2023	SGH	Reviewed and edited the 4th Interim Report.	0.50 362.00/hr	181.00
7/14/2023	SGH	Researched information of 4th Interim Report.	0.40 362.00/hr	144.80
7/17/2023	SGH	Reviewed and edited the Receiver's 4th Interim Report and sent suggested edits to the Receiver and Caroline Gieser.	0.40 362.00/hr	144.80
	SGH	Researched fee information to included in the 4th interim report and drafted email.	0.30 362.00/hr	108.60
	SSA	Weekly team meeting regarding 4th interim report and other matters.	0.40 276.00/hr	110.40
7/19/2023	SGH	Research issues for Exhibit to 4th Interim report. Drafted email regarding excluding Exhibit A. Obtained additional information to file report.	0.40 362.00/hr	144.80
		Subtotal	2.80	979.20
<u>Tax Issues</u>				
8/28/2023	SGH	Telephone call to Carol Hahn at SEC regarding pending issues and tax returns for receivership entities. Drafted email to Receiver regarding tax returns that need to be filed. Email to staff regarding tax returns due on 9/15/23. Reviewed email from Receiver regarding emergency hearing on 8/30/23.	0.40 362.00/hr	144.80
8/30/2023	SGH	Emails with Jim Jennings regarding filing tax returns.	0.30 362.00/hr	108.60
8/31/2023	JRJ	Reviewed and researched production of documents archive for Crypto FX and CBT. Discussed briefly with Scott Askue. Attempt to reconcile daily cash reports to multitude of bank statements beginning in 2020 through 2022.	3.50 276.00/hr	966.00
9/1/2023	JRJ	Set up cash journal for non bank cash receipts (custodial contributions, contract withdrawals, commissions, crypto sales, etc.). Reviewed all handwritten journals from 2/1/2021-5/3/2021.	2.50 276.00/hr	690.00
	JRJ	Continued set up of cash journal for non bank cash receipts (custodial contributions, contract withdrawals, commissions, crypto sales, etc.). Reviewed all handwritten journals from 2/1/2021-5/3/2021.	2.50 276.00/hr	690.00
9/2/2023	JRJ	Entered all non bank cash activity into cash journal set up for January-February, 2021.	2.50 276.00/hr	690.00
9/3/2023	JRJ	Entered all non bank cash activity into cash journal set up for March, 2021.	1.50 276.00/hr	414.00
9/4/2023	SGH	Reviewed email from Jim Jennings. Email to Scott Askue regarding next steps and taxes.	0.20 362.00/hr	72.40
	JRJ	Entered all non bank cash activity into cash journal set up for April, 2021.	3.50 276.00/hr	966.00
	JRJ	Organized all non bank cash reports for May 1, 2021-December 31, 2021 and January 1, 2022-end. Inventoried all bank statements for Crypto FX LLC, CBT Group, Mauricio Chavez, and Maurizzio LLC.	3.10 276.00/hr	855.60
9/5/2023	JRJ	Entered all non bank cash activity into cash journal set up for May, 2021.	3.50 276.00/hr	966.00

SEC v CryptoFX

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
9/5/2023	JRJ	1.50 276.00/hr	414.00
	SSA	1.30 276.00/hr	358.80
9/6/2023	JRJ	1.50 276.00/hr	414.00
	JRJ	3.50 276.00/hr	966.00
	JRJ	3.50 276.00/hr	966.00
	JRJ	1.50 276.00/hr	414.00
	SSA	1.30 276.00/hr	358.80
9/7/2023	JRJ	6.50 276.00/hr	1,794.00
	SSA	2.70 276.00/hr	745.20
	JRJ	3.50 276.00/hr	966.00
	SSA	1.70 276.00/hr	469.20
9/8/2023	JRJ	3.50 276.00/hr	966.00
	JRJ	3.90 276.00/hr	1,076.40
	JRJ	4.10 276.00/hr	1,131.60
	SSA	0.20 276.00/hr	55.20
9/9/2023	JRJ	6.60 276.00/hr	1,821.60
	JRJ	2.30 276.00/hr	634.80
	JRJ	1.50 276.00/hr	414.00
9/11/2023	JRJ	1.50 276.00/hr	414.00
	JRJ	1.50 276.00/hr	414.00

SEC v CryptoFX

Page 6

		<u>Hrs/Rate</u>	<u>Amount</u>
9/11/2023	JRJ	0.90 276.00/hr	248.40
	SGH	0.50 362.00/hr	181.00
	SSA	2.10 276.00/hr	579.60
9/12/2023	SSA	0.70 276.00/hr	193.20
9/14/2023	SSA	0.50 276.00/hr	138.00
9/26/2023	JRJ	6.50 276.00/hr	1,794.00
	Subtotal	88.30	24,491.20
	For professional services rendered	120.10	\$30,752.40

SEC v CryptoFX

Page 7

Additional Charges :

	<u>Amount</u>
<u>Expenses</u>	
9/30/2023 Tax software licensing fee for filing of forms 1065 for years 2020, 2021 and 2022.	105.00
Subtotal	<u>105.00</u>
Total costs	<u>\$105.00</u>
Total amount of this bill	<u><u>\$30,857.40</u></u>

Exhibit D

STANDARDIZED FUND ACCOUNTING REPORT for
Receivership in SEC v. Mauricio Chavez, Giorgio Benvenuto and Crypto FX, LLC - Cash Basis
Receivership; Civil Court Docket No. 4:22-cv-3359
Reporting Period 07/01/2023 to 09/30/2023

FUND ACCOUNTING (See Instructions:)				
Line	Description	Detail (for Current Period)	Subtotal (From Prior Period)	Grand Total (All Periods)
Line 1	Beginning Balance	\$3,661,599.05		\$0.00
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 3	Cash and Securities	\$0.00	\$3,479,325.73	\$3,479,325.73
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$0.00	\$132,824.93	\$132,824.93
Line 6	Personal Asset Liquidation	\$0.00	\$80,262.93	\$80,262.93
Line 7	Third-Party Litigation Income	\$0.00	\$0.00	\$0.00
Line 8	Miscellaneous - Other (Attorney Escrows)	\$0.00	\$527,347.20	\$527,347.20
	<i>Total Funds Available (Lines 1-8)</i>	<i>\$3,661,599.05</i>		<i>\$4,219,760.79</i>
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors	\$0.00	\$0.00	\$0.00
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	\$1,003,927.83	\$375,336.50	\$1,379,264.33
Line 10b	Business Asset Expenses	\$0.00	\$9,007.60	\$9,007.60
Line 10c	Personal Asset Expenses (Includes monthly budget for Defendant)	\$18,000.00	\$173,817.64	\$191,817.64
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
	<i>Total Third-Party Litigation Expenses</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
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	\$1,021,927.83	\$558,161.74	\$1,580,089.57
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
	<i>Total Plan Development Expenses</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
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
	<i>Total Plan Implementation Expenses</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
	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):	\$1,021,927.83	\$558,161.74	\$1,580,089.57
Line 13	Ending Balance (As of 6/30/2023):	\$2,639,671.22		\$2,639,671.22

Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	\$2,639,671.22	\$0.00	\$2,639,671.22
Line 14b	Investments	\$0.00	\$0.00	\$0.00
Line 14c	Other Assets or Uncleared Funds (Frozen Accounts)	\$0.00	\$0.00	\$0.00
	Total Ending Balance of Fund - Net Assets	\$2,639,671.22	\$0.00	\$2,639,671.22

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

Receiver:

By: _____
(signature)

(printed name)

(title)

Date: _____

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

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

ORDER AUTHORIZING PAYMENT OF RECEIVER’S
FOURTH CERTIFIED INTERIM FEE APPLICATION

On November 17, 2023, counsel for John Lewis, Jr., the Court-appointed Receiver for Mauricio Chavez (“Chavez”), Giorgio Benvenuto (“Benvenuto”), CryptoFX, LLC (“CryptoFX”), and CBT Group, LLC (“CBT”), filed an Application Authorizing Payment of Receiver’s Fourth Certified Interim Fee Application (“FCIFA”), which seeks approval of the fees incurred by the Receiver and the Receiver’s Retained Professionals from July 1, 2023 through September 30, 2023 (the “Application Period”).

Pursuant to the Receivership Order, paragraph 58, the Receiver served a copy of the proposed FCIFA, together with all exhibits and billing information to counsel for the SEC. Receiver and counsel for the SEC have conferred regarding the Receiver’s FCIFA, 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 Application. The Court finds and

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

(a) The Receiver's Fourth 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 Fourth Interim Fee Application in the amount of \$15,435.00; it is further ordered that

(c) That the Receiver's Retained Professionals be awarded fees incurred during the Third Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$65,900.54; Hays Financial Consulting, LLC for \$30,857.40; 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 FCIFA in the aggregate amount of \$135.04, 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