

2. This is the fifth fee application that the Receiver has made for himself and his retained professionals. On February 23, 2023, the Receiver filed his first certified fee application covering the period from September 29, 2022 to December 31, 2022, which was granted by the Court on March 23, 2023. (Doc. Nos. 54, 67). On June 16, 2023, the Receiver filed his second certified fee application covering the period from January 1, 2023 to March 31, 2023, which was granted by the Court on August 31, 2023 (Doc. Nos. 75, 89). The Receiver also filed a Third Interim Fee Application for Hays Financial Consulting, LLC (“HFC”) on August 8, 2023, at the request of HFC, and then filed his own Third Interim Fee Application on August 17, 2023, both of which were granted by the Court on August 31, 2023 (Doc. Nos. 90, 91). On November 17, 2023, the Receiver filed his fourth certified fee application covering the period from July 1, 2023 to September 30, 2023, which was granted by the Court on December 4, 2023 (Doc. No. 106).

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: \$14,017.50 John Lewis, Jr. (*see* Receiver’s Invoice attached as **Exhibit A**); \$59,204.63 Shook, Hardy & Bacon L.L.P. (“SHB”) (*see* SHB Invoice attached as **Exhibit B**); and \$10,878.10 Hays Financial Consulting, LLC (“Hays”) (*see* Hays Invoice attached as **Exhibit C**). The Receiver’s professional fees listed above have been reduced by \$3,045.00. Further, his counsel’s fees have been reduced by \$8,755.00.

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 \$14,017.50; to Shook Hardy and Bacon, LLP in the amount of \$59,204.63; and Hays in the amount of \$10,878.10. 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 \$9,217.63.

STANDARDIZED FUND ACCOUNTING REPORT

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

CASE STATUS

7. Cash on Hand: The Receivership Estate has \$3,500,810 deposited in four trust accounts named for each of the Defendants as of the end of the Application Period (December 31, 2023). These funds were received by (i) taking possession of cash located at the Defendants’ office located at 1124 Blalock, Houston, Texas 77055 (\$53,346); (ii) taking possession of safes located at the Defendants’ office (\$392,765); (iii) taking possession of First Community Credit Union bank accounts owned by Benvenuto (\$451,448); (iv) taking possession of Bank of America bank accounts owned by Benvenuto (\$21,325); (v) taking possession of a Simmons bank account owned by Benvenuto (\$80,764); (vi) taking possession of a Simmons bank account owned by CBT (\$247,916); (vii) taking possession of a Regions bank account owned by Chavez (\$782); (viii) proceeds from liquidating Coinbase, Inc. account (\$982,924); (ix) proceeds from liquidating Blockchain.com account (\$1,161,141); (x) taking possession of the balance of a retainer from Burford Perry LLC (\$155,631); (xx) taking possession of the balance of retainers from Gerger Hennessy & Martin LLP (\$214,488); (xxi) taking possession of the balance of retainers from Jones

Walker LLP (\$102,229); (xxii) taking possession of CryptoFX funds turned over by Defendant Mauricio Chavez (\$55,000); (xxiii) proceeds from liquidating real property at 0 Hogan Lane (\$64,758); (xxiv) proceeds from liquidating televisions (\$3,040); (xxv) proceeds from liquidating bitcoin from an exodus wallet (\$86,915); (xxvi) net sale proceeds from sale of real property at 28 Lawrence Marshall Dr. (\$65,027); (xxvii) proceeds from liquidating 2020 Volkswagen Tiguan owned by Angelica Vargas (\$16,695); (xxix) proceeds from liquidating 2021 Mercedes-Benz GLE AMG owned by Angelica Vargas (\$63,568); (xxx) net auction proceeds from personal property turned over by Defendant Mauricio Chavez (\$9,267); (xl) proceeds from liquidating real property at 0 Mack Washington (\$1,027,280.34).

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 (December 31, 2023) the Receiver has on hand the following assets:

Asset	Estimated Amount/Value
Various Laptops and desktop computers	\$5,000
2022 BMW X6 M501	\$64,600
CFX furniture and fixtures	\$2,000
Benvenuto Holdings frozen bank accounts at First Community Credit Union	\$110,702

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). Since the filing of Receiver's fourth certified fee application, Receiver has filed a Motion to Approve the Sale of real property located at 0 Mack Washington (Doc. No 97), which was granted by the Court on November 8, 2023 (Doc. No. 98) and which has netted \$1,027,280.34 to the Receivership Estate. Receiver plans on filing Motions for the sale of additional personal property, including a 2022 BMW X6 M501.

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 \$9,217.63 as a result of efforts to marshal and preserve the assets of the Receivership. Of these expenses, \$9,217.63 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
26.70	<i>See Ex. A</i>	\$14,017.50	\$0	\$14,017.50

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

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
124.90	<i>See Ex. B</i>	\$49,987.00	\$9,217.63	\$59,204.63

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

Hours	Hourly Rates	Total Fees	Total Expenses	Fees and Expenses
41.40	<i>See Ex. C</i>	\$10,846.00	\$32.10	\$10,878.10

26. The Receiver asks the Court to approve payments to SHB, on an interim basis in the amount of \$59,204.63 for the Application Period. The Receiver asks the Court to approve payments to the Receiver, on an interim basis in the amount of \$14,017.50 for the Application Period. The Receiver asks the Court to approve payments to Hays in the amount of \$10,878.10 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	1.30	\$682.50
Case Administration	17.90	\$9,397.50
Asset Disposition	3.80	\$1,995.00
Claims Administration	2.50	\$1,312.50
Litigation	1.20	\$630.00

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

Task Description	Hours Worked	Total Fees
Asset Analysis	2.30	\$977.50
Asset Disposition	4.70	\$1,997.50
Case Administration	34.60	\$14,705.00
Claims Administration	0.50	\$212.50
Business Operations	0.40	\$170.00
Data Analysis	2.30	\$414.00
Status Reports	5.70	\$2,422.50
Litigation Consulting	22.20	\$9,435.00
Litigation	124.90	\$49,987.00

Receiver's Accountant, Hays Financial Consulting, LLC

Task Description	Hours Worked	Total Fees
Accounting	4.00	\$1,104.00
Data Analysis	1.80	\$382.80
Business Analysis	5.00	\$1,252.80
Case Administration	1.60	\$489.20
Claims Administration	10.50	\$2,906.60
Fee/ Employment Applications & Objection	1.90	No Charge
Forensic Accounting	0.60	\$217.20
Status Reports	1.70	\$503.60
Tax Issues	14.30	\$3,989.80

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.

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 \$3,045.00. And, SHB's fees have been reduced by \$8,755.00. 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 Fourth 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 Fifth 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 FCIFA 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 Fifth Interim Fee Application in the amount of \$14,017.50;
- (b) That the Receiver's Retained Professionals be awarded fees incurred during the Fifth Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$59,204.63; and Hays for \$10,878.10
- (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 FCIFA in the aggregate amount of \$9,217.63, 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 Fifth 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 \$14,017.50; (2) to Shook Hardy & Bacon, LLC for \$59,204.63 and (3) to Hays for \$10,878.10.

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 \$9,217.63.

Dated: February 14, 2024

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Poston E. Pritchett

Poston E. Pritchett
Texas Bar No. 24088258
SHOOK, HARDY & BACON L.L.P.
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Kansas City, MO 64108
Telephone: 816.474-6550
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Megan J. Mitchell
Texas Bar No. 24108103
S.D. Tex. Bar No. 3435473
mjmitchell@shb.com

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

CERTIFICATE OF CONFERENCE

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

/s/ Poston E. Pritchett

Poston E. Pritchett

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February, 2024, 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
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Counsel for Defendant Giorgio Benvenuto

/s/ Poston E. Pritchett

Poston E. Pritchett

Exhibit A



Shook, Hardy & Bacon L.L.P.
2555 Grand Boulevard
Kansas City, MO 64108-2613
(816) 474-6550

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

Invoice No: 3049486
Invoice Date: 01/29/2024
Matter Number: 33206.393697
Billing Attorney: John Lewis Jr.

Summary of Invoice

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

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

Current Fees	\$14,017.50
Total Amount Due	\$14,017.50

REMITTANCE INFORMATION

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

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

Remit Address
Shook, Hardy & Bacon L.L.P.
PO Box 843718
Kansas City, MO 64184-3718
Federal Tax ID:
44-0585497

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



33206.393697 3049486 01/29/2024

Invoice DetailFor Professional services and disbursements thru *December 31, 2023*

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC01 Asset Analysis				
10/11/23	JLJ	Detailed review of [REDACTED]	1.30	\$682.50
Subtotal for SEC01 Asset Analysis			1.30	\$682.50
SEC02 Asset Disposition				
11/01/23	JLJ	Turns of motion to sale Waller county parcel of land to obtain court approval.	0.80	\$420.00
11/03/23	JLJ	Final review of the Washington land sales documents for court approval submission. Follow up questions with team regarding same.	1.80	945.00
11/29/23	JLJ	Attention to post closing matters in sale of Waller County property. Calls regarding wire instructions and other banking matters.	1.20	630.00
Subtotal for SEC02 Asset Disposition			3.80	\$1,995.00
SEC04 Case Admin				
10/09/23	JLJ	Review Blocktrace proposal relating to [REDACTED]	1.50	\$787.50
10/10/23	JLJ	Prepare for and lead call with P. Pritchett and G. Hayes on [REDACTED]	1.70	892.50
10/12/23	JLJ	(No Charge) Review fee application package for approval.	0.00	0.00
10/17/23	JLJ	(No Charge) Fee application package review and revisions.	0.00	0.00
10/23/23	JLJ	Update call on [REDACTED]	1.60	840.00
10/30/23	JLJ	Revisions to court ordered status report.	1.50	787.50
10/31/23	JLJ	Final turns of the quarterly status report. Careful review of the motion to sell Washington (Waller County) property.	3.30	1,732.50
11/10/23	JLJ	Detailed periodic review of status of ongoing [REDACTED]	4.00	2,100.00



33206.393697 3049486 01/29/2024

12/04/23	JLJ	Prepare for and attending hearing on status. Conf with M. Mitchell and P. Pritchett on [REDACTED]. Turns of emails regarding closing of Washington property sale and related publication and notice requirements.	2.50	1,312.50
12/11/23	JLJ	(No Charge) Receivership banking matters.	0.00	0.00
12/18/23	JLJ	Team call to discuss [REDACTED]	1.80	945.00
Subtotal for SEC04 Case Admin			17.90	\$9,397.50
SEC05 Claims Admin				
11/02/23	JLJ	Review options and optionality claims database and related costs. Review materials from proposed vendors.	2.50	\$1,312.50
11/07/23	JLJ	(No Charge) Skim fee application packet before submission rt SEC	0.00	0.00
Subtotal for SEC05 Claims Admin			2.50	\$1,312.50
SEC13 Litigation				
11/09/23	JLJ	Prepare for and lead call with M. Mitchell and P. Pritchett on [REDACTED].	1.20	\$630.00
Subtotal for SEC13 Litigation			1.20	\$630.00
Total			26.70	\$14,017.50

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	26.70	\$525.00	\$14,017.50
Total Fees		26.70		\$14,017.50

Total Amount Due**\$14,017.50**

Exhibit B



Shook, Hardy & Bacon L.L.P.
2555 Grand Boulevard
Kansas City, MO 64108-2613
(816) 474-6550

SHOOK HARDY AND BACON
JOHN LEWIS, JR, RECEIVER
600 TRAVIS ST, SUITE 3400
HOUSTON, TX 77002-2926

Invoice No: 3049487
Invoice Date: 01/29/2024
Matter Number: 33206.389768
Billing Attorney: John Lewis Jr.

Summary of Invoice

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

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

Current Fees	\$49,987.00
Current Disbursements	9,217.63
Total Amount Due	\$59,204.63

REMITTANCE INFORMATION

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

Wiring Instructions

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

Remit Address

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

Federal Tax ID:

44-0585497

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



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Invoice DetailFor Professional services and disbursements thru *December 31, 2023*

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

Professional Services

Date	Attorney	Description	Hours	Amount
SEC01 Asset Analysis				
10/31/23	PEP	Review prior communications and follow up with P. Flack regarding motion to compel.	0.20	\$85.00
10/31/23	PEP	Attention to agriculture exemption of Mack Washington property.	0.30	127.50
11/01/23	PEP	Attention to appraisal issues related to Mack Washington.	0.30	127.50
11/02/23	CMG	Develop strategy for [REDACTED].	0.30	127.50
11/03/23	PEP	Research situation regarding appraisal of property and exemptions associated with same.	0.40	170.00
11/07/23	PEP	Analyze response from realtor regarding appraisal district report.	0.20	85.00
11/09/23	PEP	Confer with Waller County regarding ag exemption.	0.20	85.00
11/10/23	PEP	Attention issues related to Waller County appraisal.	0.40	170.00
Subtotal for SEC01 Asset Analysis			2.30	\$977.50
SEC02 Asset Disposition				
10/02/23	PEP	Review updated Mack Washington information.	0.20	\$85.00
10/27/23	PEP	Communication to all counsel regarding disposition of Mack Washington.	0.20	85.00
10/27/23	PEP	Attention to Mack Washington sale.	0.70	297.50
10/30/23	PEP	Follow up with all counsel regarding disposition of Mack Washington.	0.20	85.00
11/03/23	PEP	Attention to Mack Washington motion to approve sale.	0.30	127.50
11/09/23	PEP	Review order confirming sale of Mack Washington property and summarize next steps regarding same.	0.20	85.00
11/14/23	PEP	Review comments from real estate agent regarding remaining items need for closing and respond to same.	0.30	127.50
11/15/23	PEP	Confer with real estate team regarding disposition of Mack Washington property.	0.20	85.00
11/16/23	PEP	Respond to inquiry from real estate team.	0.20	85.00
11/20/23	PEP	Review master closing statement.	0.20	85.00
11/29/23	PEP	Trouble shoot issues related to Mack Washington closing.	0.70	297.50
12/01/23	PEP	Further attention to issues with Mack Washington disposition.	0.60	255.00



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12/07/23	PEP	Revise report and confirmation of sale for court.	0.20	85.00
12/13/23	PEP	Multiple communications with title company regarding Mack Washington disposition and dispersement.	0.30	127.50
12/14/23	PEP	Review wire confirmations and forward to accounting team for incorporation in reports.	0.20	85.00
Subtotal for SEC02 Asset Disposition			4.70	\$1,997.50

SEC03 Business Operations

11/22/23	CAU	Correspond with ME, an investor for CFX, who was wanting an update on the receivership case.	0.10	\$42.50
11/27/23	CAU	Correspond with RQ, an investor for CFX, who was wanting an update on the receivership case; correspond with supervisors Poston and John regarding conversation with RQ.	0.30	127.50
Subtotal for SEC03 Business Operations			0.40	\$170.00

SEC04 Case Admin

10/02/23	YKR	Review and analyze title commitment documents from Mark Dimas in order to confirm the release of all liens on the Mack Washington property.	0.50	\$212.50
10/04/23	PEP	Review [REDACTED].	0.40	170.00
10/04/23	PEP	Confer [REDACTED].	0.30	127.50
10/04/23	PEP	Communications with P. Flack.	0.20	85.00
10/09/23	PEP	Follow up on various action items.	1.10	467.50
10/09/23	PEP	Attention to order on motion to compel and outstanding discovery issues.	0.30	127.50
10/11/23	PEP	Further attention to various outstanding issues.	1.20	510.00
10/12/23	PEP	(No Charge) Fee Application.	0.00	0.00
10/17/23	PEP	Attention to [REDACTED].	0.20	85.00
10/25/23	YKR	Revise motion to approve sale of Mack Washington property for filing.	2.10	892.50
10/26/23	YKR	Revise motion to approve private sale of Mack Washington property to include supporting exhibits.	1.80	765.00
10/26/23	YKR	Draft notice of terms of sale for publication in Green Sheet newspaper in accordance with statutory requirements.	0.70	297.50
10/30/23	PEP	Analyze inquiry about property inspection.	0.20	85.00
10/31/23	YKR	Review exhibits cited in support of motion to approve sale of Mack Washington property and prepare same for filing.	0.90	382.50
10/31/23	YKR	Review motion to approve sale of Mack Washington property and revise for filing.	0.90	382.50
11/01/23	YKR	Revise motion for sale of real property per edits from J. Lewis.	0.80	340.00
11/03/23	YKR	Draft proposed order approving sale of Mack Washington property.	0.80	340.00
11/03/23	YKR	Review and revise motion for sale of Mack Washington property for filing.	1.20	510.00
11/06/23	PEP	Attention to [REDACTED].	0.20	85.00



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11/07/23	YKR	Review and analyze [REDACTED]	1.10	467.50
11/13/23	PEP	Respond to inquiry from [REDACTED].	0.30	127.50
11/13/23	PEP	Respond to inquiry from P. Flack.	0.20	85.00
11/20/23	PEP	Participate in bi-weekly review of action items.	0.40	170.00
11/30/23	YKR	Draft motion reporting the sale of the Mack Washington property per request from Title Company.	1.40	595.00
11/30/23	YKR	Draft proposed order confirming sale of 0 Mack Washington property and authorizing receiver to execute deed per request from Title Company.	1.20	510.00
12/01/23	YKR	Correspond with [REDACTED]	0.90	382.50
12/01/23	YKR	Draft proposed order confirming sale of private property at 0 Mack Washington as requested by title company.	0.90	382.50
12/01/23	YKR	Draft report of sale motion as requested by the title company in order to receive proceeds from sale of private property on behalf of receivership.	1.50	637.50
12/01/23	YKR	Revise report of sale motion per comments from P. Pritchett.	0.80	340.00
12/01/23	PEP	Confer with [REDACTED]	0.30	127.50
12/04/23	PEP	Review [REDACTED].	0.40	170.00
12/04/23	YKR	Plan and prepare for hearing before Judge Hannen with J. Lewis and P. Pritchett.	0.60	255.00
12/05/23	YKR	Review deposition transcripts of [REDACTED]	1.30	552.50
12/06/23	YKR	Draft summary of relevant [REDACTED]	1.30	552.50
12/07/23	YKR	Review and analyze documents corresponding to [REDACTED]	3.10	1,317.50
12/07/23	YKR	Review and analyze documents corresponding to [REDACTED]	3.00	1,275.00
12/15/23	PEP	Attent to request from P. Flack.	0.20	85.00
12/18/23	YKR	Call with J. Lewis and P. Pritchett to discuss [REDACTED]	0.50	212.50
12/18/23	PEP	Review file regarding fees and confer with P. Flack regarding same.	0.20	85.00
12/19/23	PEP	Further review of [REDACTED]	0.40	170.00
12/19/23	PEP	Confer with S. Askue regarding [REDACTED]	0.50	212.50



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12/26/23	CAU	Review correspondence from RQ regarding CFX business; correspond with supervisor Poston regarding RQ correspondence.	0.30	127.50
Subtotal for SEC04		Case Admin	34.60	\$14,705.00
SEC05 Claims Admin				
12/05/23	PEP	Further attention to [REDACTED]	0.20	\$85.00
12/06/23	PEP	Attention to [REDACTED]	0.30	127.50
Subtotal for SEC05		Claims Admin	0.50	\$212.50
SEC10 Data Analysis				
10/09/23	LWP	Provide matter-specific database, document and case team support	0.50	\$90.00
10/10/23	LWP	Provide matter-specific database, document and case team support	0.30	54.00
12/05/23	LWP	Coordinate with vendor regarding document processing for review of documents in connection with production from opposing counsel.	0.50	90.00
12/15/23	LWP	Provide matter-specific database, document and case team support	0.50	90.00
12/18/23	LWP	Provide matter-specific database, document and case team support	0.50	90.00
Subtotal for SEC10		Data Analysis	2.30	\$414.00
SEC11 Status Reports				
10/03/23	PEP	(No Charge) Status reports and fee application.	0.00	\$0.00
10/16/23	PEP	(No Charge) Fee Application.	0.00	0.00
10/23/23	PEP	Participate in weekly status call.	0.20	85.00
10/25/23	PEP	Revisions to status report.	0.90	382.50
10/30/23	PEP	Further attention to status report.	0.70	297.50
10/30/23	YKR	Review and revise draft status report for filing.	1.70	722.50
10/31/23	PEP	Attention to status reports.	0.70	297.50
11/09/23	PEP	(No Charge) Attention to fee application.	0.00	0.00
11/15/23	PEP	(No Charge-Fee Application) Confer with M. Gulde regarding Fee Application.	0.00	0.00
11/17/23	PEP	(No Charge-Fee Application) Attention to filing fee application.	0.00	0.00
12/04/23	PEP	(No Charge-Travel) Return travel for hearing.	0.00	0.00
12/04/23	PEP	(No Charge-Fee Application) Further review of fee applications, status reports and communications regarding same in advance of hearing.	0.00	0.00
12/04/23	PEP	Appear at hearing.	0.50	212.50
12/18/23	PEP	Review action items and follow up with individuals regarding status.	1.00	425.00
Subtotal for SEC11		Status Reports	5.70	\$2,422.50



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SEC12 Litigation Consulting

10/02/23	PEP	Further analysis of [REDACTED].	0.60	\$255.00
10/25/23	PEP	Review and prepare Blocktrace [REDACTED].	2.10	892.50
10/30/23	PEP	Confer with [REDACTED].	0.20	85.00
11/02/23	MJM	Review internal documents and publicly available information to help refine strategy regarding private right of action.	3.50	1,487.50
11/09/23	MJM	Review internal documents and publicly available information to help refine strategy [REDACTED].	3.90	1,657.50
11/09/23	PEP	Review [REDACTED].	0.90	382.50
11/14/23	PEP	Summarize review of information response to [REDACTED].	0.20	85.00
11/14/23	PEP	Review responsive information to request [REDACTED].	0.20	85.00
11/16/23	MJM	Review internal documents and publicly available information to help refine strategy regarding [REDACTED].	3.70	1,572.50
11/30/23	MJM	Review internal documents and publicly available information to help refine strategy regarding [REDACTED].	3.50	1,487.50
12/04/23	MJM	Develop strategy re: potential additional asset collection.	3.10	1,317.50
12/15/23	PEP	Consider issues related to CVN data.	0.30	127.50
Subtotal for SEC12 Litigation Consulting			22.20	\$9,435.00

SEC13 Litigation

10/02/23	MKF	Preparation and organization of potential [REDACTED].	2.50	\$912.50
10/02/23	PEP	Finalize and submit order to court.	0.20	85.00
10/03/23	MKF	Continued preparation and organization of [REDACTED].	2.50	912.50
10/09/23	MKF	Perform Relativity searches regarding [REDACTED].	3.00	1,095.00
10/09/23	MKF	Review and analyst of [REDACTED].	2.50	912.50
10/10/23	MKF	Continued Relativity searching regarding [REDACTED].	3.00	1,095.00
10/10/23	MKF	Continued review and analyst of [REDACTED].	2.50	912.50
10/12/23	MKF	Preparation and organization of case materials to be shared [REDACTED].	2.00	730.00
10/25/23	PEP	Review status of motion to compel and follow up with P. Flack regarding same.	0.20	85.00
10/31/23	PEP	Confer with [REDACTED].	0.30	127.50
10/31/23	PEP	Attention to [REDACTED].	0.30	127.50



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11/02/23	PEP	Confer with [REDACTED].	0.20	85.00
11/02/23	PEP	Attention to [REDACTED].	0.20	85.00
11/07/23	PEP	Review [REDACTED].	0.20	85.00
11/09/23	PEP	Review [REDACTED].	0.30	127.50
11/10/23	PEP	Analyze Salesforce data [REDACTED].	2.00	850.00
11/13/23	PEP	Analyze proposal regarding discovery.	0.20	85.00
11/13/23	MKF	Preparation and organization of [REDACTED].	2.50	912.50
11/30/23	PEP	Analyze correspondence from P. Flack regarding production and attend to intake of same.	0.20	85.00
12/01/23	PEP	Attention to document production per request [REDACTED].	0.30	127.50
12/01/23	MKF	Preparation of received production for substantial attorney review.	2.50	912.50
12/04/23	MKF	Preparation of recent case filings to be uploaded to Receiver's Website.	1.20	438.00
12/04/23	MKF	Continued preparation of received production for substantial attorney review.	2.00	730.00
12/04/23	PEP	(No Charge-Travel) Travel to Houston for hearing.	0.00	0.00
12/04/23	PEP	Attention to strategy for [REDACTED].	1.00	425.00
12/04/23	PEP	Analyze status of investigation into [REDACTED].	0.50	212.50
12/05/23	MKF	Continued preparation of received production for substantial attorney review.	1.00	365.00
12/05/23	PEP	Address information request [REDACTED].	0.20	85.00
12/06/23	PEP	Confer with [REDACTED].	0.30	127.50
12/06/23	MKF	Perform Relativity searches regarding [REDACTED].	2.50	912.50
12/06/23	PEP	Analyze Bocktrace review [REDACTED].	0.40	170.00
12/06/23	PEP	Attention to records request [REDACTED].	0.60	255.00
12/08/23	PEP	Further attention to Blocktrace's [REDACTED].	0.40	170.00
12/08/23	PEP	Attend to subpoena to Binance.	0.20	85.00
12/08/23	PEP	Confer with M. Gulde regarding [REDACTED].	0.20	85.00
12/08/23	PEP	Confer with J. Daniels regarding [REDACTED].	0.40	170.00
12/08/23	MKF	Preparation of subpoena of documents to Binance.US.	1.50	547.50
12/11/23	MKF	Perform Relativity searches regarding [REDACTED].	2.00	730.00
12/12/23	MKF	Continued Relativity searches regarding [REDACTED].	2.50	912.50
12/13/23	PEP	Communicate with [REDACTED].	0.20	85.00
12/13/23	MKF	Continued Relativity searches regarding [REDACTED].	2.00	730.00
12/14/23	MKF	Continued Relativity searches regarding [REDACTED].	2.00	730.00
12/18/23	PEP	Confer with M. Gulde regarding [REDACTED].	0.40	170.00
12/18/23	PEP	Further attention to issues related to subpoena and [REDACTED].	0.60	255.00



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		ledger nano.		
12/19/23	MKF	Continued Relativity searches regarding [REDACTED]	2.50	912.50
Subtotal for SEC13		Litigation	52.20	\$19,653.00
Total			124.90	\$49,987.00

Timekeeper Summary

Initials	Name	Hours	Rate	Amount
CMG	Caroline M. Gieser	0.30	\$425.00	\$127.50
MJM	Megan J Mitchell	17.70	425.00	7,522.50
PEP	Poston E. Pritchett	32.70	425.00	13,897.50
YKR	Yara K. Rashad	29.00	425.00	12,325.00
CAU	Cesar A. Udave	0.70	425.00	297.50
MKF	Mia K. Fleming	42.20	365.00	15,403.00
LWP	Levi W. Percy	2.30	180.00	414.00
Total Fees		124.90		\$49,987.00

Disbursements

Date	Description	Amount
Expense Code: E106		
06/06/23	TLO	\$35.00
08/29/23	TLO - (05/16/2023).	5.00
Subtotal for E106		\$40.00
Expense Code: E108		
08/10/23	Postage	\$19.92
08/22/23	Postage	40.80
08/27/23	Postage	29.88
08/27/23	Postage	4.44
09/10/23	Special Postage	19.92
09/22/23	Special Postage	40.80
09/27/23	Special Postage	4.44
09/27/23	Special Postage	29.88
Subtotal for E108		\$190.08
Expense Code: E110		
11/27/23	Poston E. Pritchett - Airfare Poston, Airfare - Coach from Kansas City, MO to Houston, TX and Houston, TX to Kansas City, MO, Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023 - 12/04/2023	\$585.04
12/04/23	Poston E. Pritchett - Travel Related Expense Poston, Taxi/Car Service from , Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023	49.55
12/04/23	Poston E. Pritchett - Travel Related Expense Poston, Taxi/Car Service from , Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023	64.15



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Date	Description	Amount
12/04/23	Poston E. Pritchett - Travel Related Expense Poston, Taxi/Car Service from , Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023	63.75
12/04/23	Poston E. Pritchett - Travel Related Expense Poston, Taxi/Car Service from , Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023	40.98
Subtotal for	E110	\$803.47

Expense Code: E111

12/04/23	Poston E. Pritchett - Meals Poston, Meals Other, Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023	\$4.16
12/04/23	Poston E. Pritchett - Meals Poston, Meals Other, Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023	5.74
12/04/23	Poston E. Pritchett - Meals Poston, Lunch, Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023	12.45
12/04/23	Poston E. Pritchett - Meals Poston, Meals Other, Hearing in Houston, Texas regarding the SEC Chavez matter., 12/04/2023	4.82
Subtotal for	E111	\$27.17

Expense Code: E118

06/30/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for June 2023, related to SEC v. Mauricio Chavez, et al.	\$1,295.70
07/31/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for July 2023, related to SEC vs. Mauricio Chavez, et al.	1,220.70
08/31/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for August 2023, related to SEC vs. Mauricio Chavez, et al.	1,295.78
09/30/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for September 2023, related to SEC vs. Mauricio Chavez, et al	1,295.78
10/31/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for October 2023, related to SEC vs. Mauricio Chavez, et al	1,557.10
11/30/23	Gulfstream Legal Group LLC - Litigation Support Gulfstream Legal Group LLC, Relativity managed services and electronic data collection invoice for November 2023, related to SEC vs. Mauricio Chavez, et al	1,295.85
Subtotal for	E118	\$7,960.91

Expense Code: E124

11/06/23	Commerce Bank - Advertising Commerce Bank, Green Sheet Ads for Property Listing re: 28 Mack Washington Lane, Hempstead, TX 77445	\$98.00
11/06/23	Commerce Bank - Advertising Commerce Bank, Green Sheet Ads for Property Listing re: 28 Mack Washington Lane, Hempstead, TX 77445	98.00
Subtotal for	E124	\$196.00
Total Disbursements		\$9,217.63



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Current Disbursements	<u>9,217.63</u>
Total Amount Due	<u>\$59,204.63</u>

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 10/1/2023 to 12/31/2023

January 18, 2024

Professional Services

	<u>Hours</u>	<u>Amount</u>
Accounting	4.00	1,104.00
Business Analysis	5.00	1,252.80
Case Administration	1.60	489.20
Claims Administration & Objections	10.50	2,906.60
Data Analysis	1.80	382.80
Fee / Employment Applications & Objection	1.90	NO CHARGE
Forensic Accounting	0.60	217.20
Status Reports	1.70	503.60
Tax Issues	14.30	3,989.80
	<u>41.40</u>	<u>\$10,846.00</u>

Additional Charges :

Pacer Charges	32.10
Total costs	<u>\$32.10</u>

Total amount of this bill	<u><u>\$10,878.10</u></u>
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Hays Financial Consulting, LLC

2964 Peachtree Road
 Suite 555
 Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 10/1/2023 to 12/31/2023

January 18, 2024

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
Dwaine A. Butler	2.80	476.00
	170.00/hr	
James R. Jennings, CPA	13.40	3,698.40
	276.00/hr	
S. Gregory Hays, CTP, CIRA	3.30	1,013.60
	307.15/hr	
Scott S. Askue	21.90	5,658.00
	258.36/hr	
For professional services rendered	41.40	\$10,846.00
Additional Charges :		
Pacer Charges		32.10
Total costs		\$32.10
Total amount of this bill		\$10,878.10

Hays Financial Consulting, LLC

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 10/1/2023 to 12/31/2023

January 18, 2024

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Accounting</u>			
10/10/2023	SSA	Reviewed prior quarter transactions and prepared SFAR for period ending 9/30/23.	1.80 276.00/hr 496.80
10/19/2023	SSA	Reviewed form2, recoveries and other mattes. Prepared updated recovery analysis.	1.20 276.00/hr 331.20
12/4/2023	SSA	Drafted emails regarding payment and allocation of awarded fees amongst cases.	0.30 276.00/hr 82.80
12/6/2023	SSA	Prepared analysis of fee and expense allocation among defendants bank accounts.	0.70 276.00/hr 193.20
	Subtotal		4.00 1,104.00
<u>Business Analysis</u>			
10/9/2023	DAB	Reviewed Relativity portal for case detail and supporting documentation regarding specific insider research.	0.60 170.00/hr 102.00
10/11/2023	SSA	Reviewed and compiled data from Salesforce relating to select leaders.	3.40 276.00/hr 938.40
10/12/2023	DAB	Follow up research via Relativity portal. Review of open issues and leader research.	0.60 170.00/hr 102.00
12/5/2023	SSA	Compiled and drafted email to Poston Pritchett regarding records relating to Julio Taffinder.	0.40 276.00/hr 110.40
	Subtotal		5.00 1,252.80
<u>Case Administration</u>			
10/10/2023	SGH	Zoom call with Receiver, Poston Pritchett, and Scott Askue regarding pending matters, next report, and litigation claims.	0.60 362.00/hr 217.20
	SSA	Telephone conference with the Receiver, Poston Pritchett and Greg Hays regarding various case matters.	0.60 276.00/hr 165.60
10/11/2023	SGH	Drafted email to Receiver regarding pending matters.	0.20 362.00/hr 72.40
10/25/2023	DAB	Discussed issues with Greg Hays regarding case status and review of outstanding case issues.	0.20 170.00/hr 34.00
	Subtotal		1.60 489.20

SEC v CryptoFX

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		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Claims Administration & Objections</u>			
10/19/2023	SSA	1.50 276.00/hr	414.00
11/20/2023	SSA	0.70 276.00/hr	193.20
11/28/2023	SGH	0.10 362.00/hr	36.20
11/29/2023	SSA	3.60 276.00/hr	993.60
12/4/2023	SSA	3.90 276.00/hr	1,076.40
12/19/2023	SSA	0.70 276.00/hr	193.20
	Subtotal	10.50	2,906.60
<u>Data Analysis</u>			
10/18/2023	SGH	0.40 362.00/hr	144.80
	DAB	0.70 170.00/hr	119.00
11/2/2023	DAB	0.70 170.00/hr	119.00
	Subtotal	1.80	382.80
<u>Fee / Employment Applications & Objection</u>			
10/10/2023	SSA	1.40 276.00/hr	NO CHARGE
10/11/2023	SGH	0.30 362.00/hr	NO CHARGE
10/12/2023	SGH	0.20 362.00/hr	NO CHARGE
	Subtotal	1.90	0.00
<u>Forensic Accounting</u>			
10/4/2023	SGH	0.30 362.00/hr	108.60
11/29/2023	SGH	0.30 362.00/hr	108.60
	Subtotal	0.60	217.20

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		<u>Hrs/Rate</u>	<u>Amount</u>	
<u>Status Reports</u>				
10/27/2023	SSA	Reviewed and edited status report. Drafted email to Poston Pritchett regarding same. Prepared exhibits for same.	1.30 276.00/hr	358.80
10/30/2023	SGH	Reviewed and edited report.	0.40 362.00/hr	144.80
	Subtotal		1.70	503.60
<u>Tax Issues</u>				
10/2/2023	JRJ	Reviewed and analyzed all reporting done for non bank cash activity for the period January 1, 2021-September 30, 2022. Prepared memorandum discussing \$50,000,000 net income and corresponding distributions made to Mauricio Chavez.	4.50 276.00/hr	1,242.00
10/6/2023	JRJ	Set up analysis database for bank transactions for 2021 for Cadence Bank acct 7103 and 7129. Researched wires and checks. Compiled data set to use in support of bank statements for January 1, 2021-June 30, 2021.	3.10 276.00/hr	855.60
10/10/2023	JRJ	Reviewed banking transactions in accts 7037 and 7129 for determining taxable income to be combined with non bank transaction analysis for years 2021 and 2022 Mauricio Chavez Schedule C of 1040.	1.50 276.00/hr	414.00
10/15/2023	JRJ	Reviewed all final 2021 bank activity for Cadence bank for 2021 for accounts 7129 and 7103. Cleaned up analysis and updated memo for taxable income for Mauricio Chavez for 2021.	3.90 276.00/hr	1,076.40
	SGH	Reviewed tax memorandum from Jim Jennings and considered issues regarding the cash transaction and the information that Jim Jennings has assembled.	0.50 362.00/hr	181.00
10/16/2023	SSA	Reviewed various tax issues and impact on Mauricio Chavez's return. Emails regarding same.	0.40 276.00/hr	110.40
10/19/2023	JRJ	Reviewed Receivership order to research Receiver responsibilities regarding income tax filings of the Defendant. Drafted email to G Hays and S Askue regarding same.	0.40 276.00/hr	110.40
	Subtotal		14.30	3,989.80
	For professional services rendered		41.40	\$10,846.00

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Additional Charges :

	<u>Amount</u>
<u>Expenses</u>	
10/13/2023 Pacer on-line charges	32.10
Subtotal	32.10
Total costs	\$32.10
Total amount of this bill	<u><u>\$10,878.10</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 10/01/2023 to 12/31/2023

FUND ACCOUNTING (See Instructions:)				
Line	Description	Detail (for Current Period)	Subtotal (From Prior Period)	Grand Total (All Periods)
Line 1	Beginning Balance	\$2,639,671.22		\$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	\$1,027,280.34	\$132,824.93	\$1,160,105.27
Line 6	Personal Asset Liquidation	\$9,267.00	\$80,262.93	\$89,529.93
Line 7	Third-Party Litigation Income	\$0.00	\$0.00	\$0.00
Line 8	Miscellaneous - Other (Attorney Escrows)	\$0.00	\$527,347.20	\$527,347.20
	<i>Total Funds Available (Lines 1-8)</i>	<i>\$3,676,218.56</i>		<i>\$5,256,308.13</i>
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors	\$0.00	\$0.00	\$0.00
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	\$112,192.94	\$1,379,264.33	\$1,491,457.27
Line 10b	Business Asset Expenses	\$0.00	\$9,007.60	\$9,007.60
Line 10c	Personal Asset Expenses (Includes monthly budget for Defendant)	\$63,215.91	\$191,817.64	\$255,033.55
Line 10d	Investment Expenses	\$0.00	\$0.00	\$0.00
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees	\$0.00	\$0.00	\$0.00
	2. Litigation Expenses	\$0.00	\$0.00	\$0.00
	<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	\$175,408.85	\$1,580,089.57	\$1,755,498.42
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):	\$175,408.85	\$1,580,089.57	\$1,755,498.42
Line 13	Ending Balance (As of 6/30/2023):	\$3,500,809.71		\$3,500,809.71

Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	\$3,500,809.71	\$0.00	\$3,500,809.71
Line 14b	Investments	\$0.00	\$0.00	\$0.00
Line 14c	Other Assets or Uncleared Funds (Frozen Accounts)	\$0.00	\$0.00	\$0.00
	Total Ending Balance of Fund - Net Assets	\$3,500,809.71	\$0.00	\$3,500,809.71

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 the Fund:			
Line 17	DC & State Tax Payments	\$0.00	\$0.00	\$0.00
Line 18	No. of Claims:			
Line 18a	# of Claims Received This Reporting Period			0
Line 18b	# of Claims Received Since Inception of Fund			0
Line 19	No. of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid This Reporting Period			0
Line 19b	# of claimants/Investors Paid Since Inception of Fund			0

Receiver:

By: _____
(signature)

(printed name)

(title)

Date: _____

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

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

(b) The Receiver be conditionally awarded fees incurred during the Fifth Interim Fee Application in the amount of \$14,017.50; it is further ordered that

(c) The Receiver's Retained Professionals be awarded fees incurred during the Fifth Interim Fee Application as follows: Shook Hardy & Bacon, LLC for \$59,204.63; Hays Financial Consulting, LLC for \$10,878.10; it is further ordered that

(d) The out-of-pocket costs and expenses incurred by the Receiver in the ordinary course of the administration and operation of the Receivership, as set out more fully in the FCIFA in the aggregate amount of \$9,217.63 are reasonable and necessary, and that they be approved for immediate reimbursement by the Receiver.

IT IS SO ORDERED this ____ day of _____, 2024.

JUDGE ANDREW S. HANEN
UNITED STATES DISTRICT JUDGE