

EXHIBIT D

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

SECURITIES AND EXCHANGE)
COMMISSION,)

Plaintiff,)

vs.) Case No. 4:22-cv-3359

MAURICIO CHAVEZ,)
GIORGIO BENVENUTO, and)
CRYPTOFOX, LLC,)

Defendants.)

and)

CBT GROUP, LLC,)

Relief Defendant.)

ORAL VIDEOTAPED DEPOSITION

ORAL VIDEOTAPED DEPOSITION OF

MR. JULIO E. TAFFINDER

December 14, 2022

ORAL VIDEOTAPED DEPOSITION OF MR. JULIO E.
TAFFINDER, produced as a witness at the instance of
the Plaintiff and duly sworn, was taken in the
above-styled and numbered cause on the 14th day of
December, 2022, from 9:15 a.m. to 6:43 p.m., before
Michelle Hartman, Certified Shorthand Reporter in and
for the State of Texas and Registered Professional
Reporter, reported by computerized stenotype machine

1 Q. I am just going to go ahead and mark this
2 document as Exhibit 31 --

3 (Exhibit 31 marked)

4 Q. (BY MR. GULDE) -- and hand it to you.
5 Can you tell me what I have marked as
6 Exhibit 31?

7 A. Am I looking for a yellow sticker?

8 Q. I put a front -- a sticker on the first
9 page there that says --

10 A. Oh.

11 Q. -- Exhibit 31.

12 A. Sorry.

13 Q. That's for our purposes to identify it
14 when we're looking at this record later.

15 A. Okay.

16 Q. Can you tell me what this document is?

17 A. Oh, of course, yes, sir. It's a WhatsApp
18 chat between me and Mauricio.

19 Q. And as I read it, it -- it starts with a
20 chat entry from April 19th, 2022; is that correct?

21 A. Yes, sir.

22 Q. And the last one on here is from
23 October 8th, 2022?

24 A. Yes.

25 Q. And this is a document that you provided

1 to your lawyer recently?

2 A. Yes, sir.

3 Q. Okay. As you look at it -- when you
4 provided it to your lawyer, was it in the same form
5 that it -- that it was sitting in your phone or your
6 computer?

7 A. Of course.

8 Q. Okay. Did you do anything to change it?

9 A. No, sir.

10 Q. Are there any texts between you and
11 Mauricio outside of this time frame, April to
12 October?

13 A. So there were texts before, but I had a
14 phone glitch, so these are the -- from the WhatsApp
15 chat, these are the only ones that exist.

16 Q. So am I to understand you switched your
17 phone sometime around April --

18 A. In March.

19 Q. -- 2022?

20 A. Yes, sir. But the WhatsApp chat started
21 in April.

22 Q. Did you have WhatsApp chats on the prior
23 phone?

24 A. No.

25 Q. Okay. How did you communicate with

1 Mauricio before April of 2022?

2 A. IMessage.

3 Q. IMessage on a --

4 A. iPhone.

5 Q. -- an iPhone?

6 A. Yes, sir.

7 Q. Is that just the normal text message app
8 on an iPhone?

9 A. Correct.

10 Q. Okay. And when you got your new phone,
11 did you migrate any of that data over to your -- over
12 to your new phone?

13 A. The -- the other iMessages that were
14 submitted were -- those were the ones that I was able
15 to retrieve.

16 Q. Okay. So you gathered in preparation for
17 this deposition the messages you were able to
18 retrieve?

19 A. Exactly, yes, sir.

20 Q. Okay. And what was the process you went
21 through to get your hands on those?

22 A. So on the Apple computer, you are able
23 to -- whatever is synced to the computer, you're able
24 to print out a PDF file of it, and it automatically
25 generates that.

1 Q. Okay. So between this document,
2 Exhibit 31 --

3 A. Uh-huh.

4 Q. -- and the other text messages that you
5 provided to your lawyer --

6 A. Yes, sir.

7 Q. -- that he provided to us, are there any
8 other text messages that you have between you and
9 Mauricio?

10 A. No text, just the e-mails that were
11 provided as well.

12 Q. You provided e-mails, okay.

13 A. Yes, sir.

14 Q. Are there any other records of your
15 communications other than those text messages or
16 e-mails?

17 A. Not that I recall, sir.

18 Q. Okay. So let's just start with this
19 document, Exhibit 31.

20 A. Uh-huh.

21 Q. Starting in April of 2022, had Mauricio
22 told you prior to this that he had already been
23 interviewed by the SEC in February?

24 A. I have no idea, sir.

25 Q. Okay. And I noticed down in the third

1 entry here for 4/21 at 4:22 p.m., there's Flow with
2 two emojis there. And who is that?

3 A. That's my -- so in October, I was
4 receiving a lot of calls constantly, and for security
5 reasons, I didn't know who had access to my phone, so
6 I changed the -- my name on WhatsApp to Flow, just to
7 limit the amount of calls that I was receiving.

8 Q. And is there any significance to the word
9 "Flow"?

10 A. No, sir.

11 Q. Okay. Do you know -- why did you pick
12 it?

13 A. I believe that my parents' death, like
14 everything just goes with the flow in life --

15 Q. Okay.

16 A. -- and you just have to adjust to that.

17 Q. Is there any meaning to the emojis?

18 A. Oh, no, sir. I like learning, so I'm
19 putting a little thing.

20 Q. That's a graduation cap?

21 A. Yes, sir.

22 Q. And then some stars?

23 A. Yes, sir.

24 Q. Okay. What was your name before you
25 changed it to Flow?

1 Q. I guess, what is the -- what does the
2 month of April mean in this sentence? Is it that's
3 when the request came in from -- into customer
4 service?

5 A. It could be that either the customer
6 called in June regarding April or it could be that
7 the -- for whatever reason or another, that that
8 payment wasn't processed.

9 Q. Would it have anything to do with the
10 contract date?

11 A. So it says "April," that means that the
12 customer's contract date was from April.

13 Q. Okay. So -- so as I understand it here,
14 the month of April refers to the contract due date of
15 payment?

16 A. Yes, sir.

17 Q. Okay. And you're saying, you know, it's
18 June, that -- that could be because people just
19 haven't called much?

20 A. Exactly.

21 Q. Okay. It doesn't necessarily mean that
22 Mauricio's been stingy with the BitCoin?

23 A. Exactly, sir.

24 Q. Okay. Excuse me. Let's turn to -- turn
25 to the next page and look about halfway down the

1 page. There's a message from Mauricio --

2 A. Uh-huh.

3 Q. -- that starts in Spanish, and then is
4 paid -- is spaced differently than other messages.

5 A. Uh-huh.

6 Q. Do you see that?

7 A. (Nods).

8 Q. What does that -- what does "CFX formato
9 de retiro de pago" (ph) mean?

10 A. Oh. So that's how customers sent in
11 through the customer service their information, sir.

12 Q. And what does that literally mean in
13 Spanish?

14 A. It means CFX contract payment withdrawal.

15 Q. And they would send these directly to
16 Mauricio?

17 A. Again, sir, some -- some people had
18 their -- his direct phone number, sir.

19 Q. Did some of these come through customer
20 service as well?

21 A. Most --

22 Q. Okay.

23 A. -- should have come through there, sir.

24 Q. Do you have any sense, like what
25 percentage came through customer service versus

1 Mauricio?

2 A. No, sir.

3 Q. Okay. So as we look down the page here,
4 does this mean that Mauricio is telling you that Joel
5 Ayala is wishing to withdraw his payment and cancel
6 his contract?

7 A. I think those are just a template space
8 holder, sir.

9 Q. You don't -- is there a real Joel Ayala?

10 A. There should be, sir.

11 Q. Okay. Well, explain -- explain what you
12 mean by template or placeholder.

13 A. So this was a template of how customer
14 service needed to receive customer information, sir.

15 Q. Oh, okay. So that's what -- that's what
16 "formato" means?

17 A. Yes, sir --

18 Q. Okay.

19 A. -- format.

20 Q. Got you. So he is -- is he sending this
21 to you to tell you what the format should be?

22 A. No. He's simply telling me that he
23 received that, this customer information, and to
24 basically, you know, make sure that it is tracked.

25 Q. That what is tracked?

1 them?"

2 A. I was asking -- I was trying to
3 understand what was going on with that situation,
4 because I had never come across it, sir.

5 Q. Yeah. And what did you end up finding
6 out about that?

7 A. I don't exactly remember. I believe they
8 were, but did not seem to have answered my question.

9 Q. Now, does that 18 percent mean that they
10 were better at trading BitCoin than L.A.?

11 A. I don't know where it came from, sir.

12 Q. What's your understanding of how CFX was
13 able to pay any percent of return on amounts invested
14 by student investors?

15 A. Mauricio would conduct trading, sir.

16 Q. And you said trading, not training?

17 A. Trading, yes.

18 Q. Okay. So Mauricio would conduct trading
19 in -- in what assets?

20 A. I don't know, sir.

21 Q. Now, do you know if Mauricio conducted
22 trades in -- in crypto currency?

23 A. I witnessed a Coinbase Pro account once.

24 Q. And do you have any details of that
25 Coinbase Pro account?

1 A. No. He just mentioned that he had made
2 \$50,000 in five minutes once and then he showed the
3 transaction.

4 Q. When was this transaction?

5 A. It was when I was joining, sir.

6 Q. Would that have been around -- or when
7 was that?

8 A. It should have been around -- I started
9 volunteering for classes in February, so around that
10 time, sir.

11 Q. And this is February of 2022?

12 A. Yes, sir.

13 Q. And Mauricio -- Mauricio was telling you
14 that he just made \$50,000 in five minutes?

15 A. Yes, sir.

16 Q. And did he spin his monitor around and
17 show you?

18 A. Oh, no, he showed me on his phone, sir.

19 Q. On his phone?

20 A. Yeah.

21 Q. And is this something Mauricio did more
22 than once?

23 A. No, sir, I only saw it once.

24 Q. Did you ever see any -- anything on his
25 phone or in documentation that reflected other crypto

1 currency trading?

2 A. I saw a -- on his monitor, he had
3 CoinMarketCap pulled up quite often.

4 Q. What is CoinMarketCap?

5 A. It is a platform that shows you all the
6 crypto currencies and their relevant prices at the
7 time.

8 Q. And could you tell if he was logged in as
9 a trader on this website?

10 A. No, sir.

11 Q. Is this a trading website that allows you
12 to conduct transactions?

13 A. It's an information site, sir.

14 Q. Okay. So it's like having CNN up?

15 A. Yes.

16 Q. Okay. So that's not an indication to you
17 that he was conducting trades?

18 A. I never saw anything other than
19 described, sir.

20 Q. Okay. So you saw on his monitor, he
21 would have the CoinMarketCap screen up, and he showed
22 you his phone the one time.

23 Did you actually confirm that there was a
24 \$50,000 gain on a transaction?

25 A. I glanced at it, sir.

1 Q. Yeah. So at no time in September did
2 Mauricio talk to you about the SEC lawsuit?

3 A. No, sir --

4 Q. Okay.

5 A. -- unfortunately not.

6 Q. And not a week later when the receiver
7 was appointed?

8 A. When is that, sir?

9 Q. That was on September 29th.

10 A. No, sir.

11 Q. And just to confirm, you know, between
12 the 20 -- the 20th of September and the 29th of
13 September, Mauricio is still sending you BitCoin in
14 your role as -- as a liaison for people who wanted to
15 get paid on their contracts in BitCoin, correct?

16 A. He sent me on the 27th, sir, based on the
17 chat.

18 Q. Sure, sure. And -- well, and look at
19 page 185. On the 23rd, he sent you 50,000, right?

20 A. If that's what it says on the chat, sir.

21 Q. Okay.

22 A. Okay, yes.

23 Q. And then on the 23rd, the same day, you
24 left him 85,000 in NFT sales, right?

25 A. Where?

1 Q. The very top, the very top of the page,
2 page 186.

3 A. Oh, yes, sir. Yeah, in that particular
4 instance, again, I left it with Henry.

5 Q. Okay. And would that have been \$85,000
6 in cash?

7 A. For those particular, yes, sir.

8 Q. Okay. And then on the 27th, you've
9 already said he sent you another \$25,000. You know,
10 on the -- on the evening of the 29th, there at the
11 bottom of page 187, Mauricio says, "Call me when you
12 get a chance."

13 A. Uh-huh.

14 Q. Did you have that conversation?

15 A. Yes, he did call me, sir.

16 Q. Do you -- well, he called you? Because
17 he asked you to call him.

18 A. I don't -- if he says, "Call me when you
19 get a chance," then I probably did follow up, sir.

20 Q. Okay. But that conversation happened?

21 A. Yes, sir.

22 Q. And what did Mauricio tell you on the
23 29th?

24 A. He was asking me if I was going to
25 Chicago on October 1st, and October 1st I was

1 scheduled to do a learning -- live learning, again
2 about the history of BitCoin and where we're at and
3 where we're going.

4 Q. Were you supposed to do that live from
5 Chicago?

6 A. Yes, sir.

7 Q. Okay. Did that end up happening?

8 A. Yes, sir.

9 Q. During that conversation, did he say, "By
10 the way, a receiver was appointed in our case this
11 morning"?

12 A. No, sir, not at all.

13 Q. Okay. Move on down to the bottom of page
14 188. You send him a message at 10:16 in the morning
15 that says, "Hi, Brother. Carlito sent me the news.
16 Let's get together, brainstorm some ideas and bite
17 this in the butt brother"?

18 A. Yes, sir.

19 Q. Strongarm, rocket ship?

20 A. Yes, sir.

21 Q. What news had Carlito sent you?

22 A. The news of the lawsuit, sir.

23 Q. Do you remember what news outlet?

24 A. No, sir. It was a -- there was a news
25 from El Salvador if I remember correctly.

1 he had and he's --

2 Q. Mauricio went on a date with Juan?

3 A. No, sir. Apologies. Juan at the time
4 was dating a very pretty lady that he was into --

5 Q. Oh, okay.

6 A. -- and so Mauricio gave him all his
7 money, and he was recollecting those type of memories
8 to enforce that he still has the best interest of the
9 community in mind.

10 MR. PATEL: We should probably, just so
11 it's clear -- who is -- who is -- when you describe
12 these comments and this conversation, who is in
13 attendance for those conver -- for that conversation?

14 THE WITNESS: There was a staff meeting
15 held that week.

16 Q. (BY MR. GULDE) And who was present at the
17 staff meeting?

18 A. The entire staff, sir.

19 Q. So when he says on 10/4, "Let's get
20 together this afternoon," that's announcing the staff
21 meeting to you?

22 A. Yes. But I can't recollect that we got
23 together that day.

24 Q. But the conversation that you're
25 recalling when he's talking about prior good deeds,

1 that was in a staff meeting with other people?

2 A. Yes, sir.

3 Q. And who else was present at that one?

4 A. The entire staff, sir.

5 Q. Okay. And can you -- that's everybody
6 who works at Blalock?

7 A. Yes, sir, the accounting team, sales
8 team, everyone.

9 Q. Where was the meeting?

10 A. Royal Sonesta, sir, as well.

11 Q. Okay. So that's -- is that where we're
12 talking about the very last entry on this document,
13 on 10/8 --

14 A. Yes, sir.

15 Q. -- or is it a -- could there have been
16 multiple meetings at the Royal Sonesta?

17 A. There could have been multiple meetings
18 at the Royal Sonesta.

19 Q. Okay. So do you -- do you recall if
20 there were multiple meetings after 10/4 at the Royal
21 Sonesta?

22 A. There was -- there was two, sir, that I
23 recollect.

24 Q. Okay. And were they both staff type
25 meetings?

1 A. Yes, sir.

2 Q. Where the entire staff of CFX was there?

3 A. Yes, sir.

4 Q. Okay. And we talked about entire staff.

5 Is this like 25 people?

6 A. Hmm, I think it was more around 30
7 people, sir.

8 Q. Okay. What sort of facility at the Royal
9 Sonesta?

10 A. It was just a conference room, sir.

11 Q. Okay. Do you know who paid for it?

12 A. No, sir.

13 Q. Did you have anything to do with setting
14 that up?

15 A. No, sir.

16 Q. Had the space been reserved for CFX?

17 A. I presume so, sir.

18 Q. Okay. Halfway down the page on 189 --

19 A. Uh-huh.

20 Q. -- you send him a Google Map of a
21 location on Westheimer.

22 A. Yes, sir.

23 Q. What is that?

24 A. So that was a -- so he asked me to book a
25 temporary office there.

1 Q. And did you book a temporary office?

2 A. Yes, sir.

3 Q. Who -- who did you contact for that?

4 A. It was done through Spaces.

5 Q. Spaces, S-P-A-C-E-S?

6 A. Yes, sir. It's a website.

7 Oh, sir --

8 Q. Yeah?

9 A. -- this was the day actually that I found
10 out about the SEC. It was this evening.

11 Q. So 10/5 is the day that you had that
12 conversation with Marvin?

13 A. Yes, sir.

14 Q. After your conversation with Mauricio
15 about temporary office space?

16 A. No, before.

17 Q. Okay. So walk me through that timeline.

18 A. So before 10/5, I didn't understand the
19 details or implications of everything happening with
20 the lawsuit, nor the asset freeze, nor the
21 appointor/receiver, or I believe there's also a
22 restraining order or something with that. So I
23 didn't understand those details.

24 Then on 10/5, he asked me to get a space
25 for the staff, for the customer service so they can

1 take calls, and so that place was booked. And then
2 at the end of that day is when Marvin -- I would meet
3 with Marvin and Marvin brings up the details of
4 everything that's happening, sir.

5 Q. You're telling me that this -- when you
6 say this place was "booked," do you mean it was full,
7 it was already occupied, or are you saying that you
8 booked this space for CFX?

9 A. It was rented. It was just a temporary
10 rental for caparse (ph).

11 Q. I'm talking about the use of the passive
12 voice whenever we're not knowing who's doing the --
13 the stuff, so --

14 A. Oh, yes, he asked me to -- to book it.

15 Q. Mauricio asked you to book this location
16 on Westheimer?

17 A. He asked me to book a location.

18 Q. Okay. And you found the location on
19 Westheimer?

20 A. This was the only thing available, sir.

21 Q. Got you. And you sent him this map?

22 A. Uh-huh.

23 Q. And he okayed it, said, "Awesome"?

24 A. Yes, sir.

25 Q. Okay. How much was rental on that?

1 A. Anywhere between a hundred or \$150, maybe
2 a little bit more.

3 Q. Per what?

4 A. Per the day.

5 Q. And how many days did you rent it for?

6 A. Oh, just that one, sir.

7 Q. Okay. And where did you get the
8 hundred -- hundred to \$150 a day to --

9 A. To pay bills --

10 Q. -- pay it?

11 A. -- that -- that was just personal, sir.

12 Q. You paid for it?

13 A. Yes, sir.

14 Q. Out of your own pocket?

15 A. Yes, sir.

16 Q. Okay. Did Mauricio ask you to do that?

17 A. Yes, sir. Well, he told me to book it,
18 sir, and he didn't provide me further details.

19 Q. Okay. And did you -- so what did -- what
20 did CFX use that space for?

21 A. It was just more of an employee meeting.
22 Everybody was venting. Some people answered customer
23 phone calls, but it was -- we were all kind of lost
24 as to what was going on, sir.

25 Q. Did Mauricio address what was going on?

1 A. No, he never showed up, sir.

2 Q. Who was in charge at this suite on
3 Westheimer?

4 A. There wasn't really anybody in charge,
5 sir.

6 Q. How long were employees at this suite on
7 Westheimer?

8 A. A few hours, sir.

9 Q. How did people know to show up there?

10 A. This was shared, sir, to the group
11 members, to the team.

12 Q. It was shared?

13 A. Yes, sir.

14 Q. By whom?

15 A. I shared it based on Mauricio's
16 instruction, sir.

17 Q. Okay. And what did you tell people when
18 you shared this location?

19 A. That there was a temporary office that
20 was booked for that day, sir, and to meet there.

21 Q. Okay. Did you express that this was
22 Mauricio's wish that people show up?

23 A. I don't recall, sir.

24 Q. Where would we see a copy of that
25 message?

1 A. There is a -- there should be an
2 employee's chat, sir.

3 Q. Okay. Are you a member of that
4 employee's chat?

5 A. Yes, sir. I should be able to pick up
6 the message, sir.

7 Q. Okay. You have access to it right now as
8 far as we -- as far as you know?

9 A. I should have.

10 Q. Okay. That's responsive to the requests
11 we have already made, so please give that to your
12 lawyer.

13 A. Of course, sir.

14 (Information to be supplied)

15 Q. (BY MR. GULDE) All right. A little bit
16 later on -- well, the next day at 7:07 on the 6th,
17 you reach out to Mauricio and -- and you say, "Good
18 evening. Can we meet tomorrow morning for breakfast
19 at our -- at 8:00 at our usual spot."

20 A. Uh-huh.

21 Q. What's your "usual spot"?

22 A. So we had met once or twice in this place
23 called Le Peep --

24 Q. Okay.

25 A. -- on West -- not Westheimer, I'm sorry,

1 I-10 and Gessner, like near Memorial Mall.

2 Q. And you said, "I have to run some
3 important things by you and possible solutions to
4 consider." Do you see that?

5 A. Yes, sir.

6 Q. What important things did you need to run
7 by Mauricio?

8 A. So as I met with Marvin and found out
9 more of what's going on, coincidentally at the same
10 interval in time, I found my attorney, Ronak; and he
11 wasn't my attorney at the time, but I figured that
12 maybe he could provide an opinion to him if he needed
13 it.

14 Q. So you -- you reached out saying, "Got
15 some important things to run by you," and one of
16 those things in your mind was you've made contact
17 with a lawyer who knows this space and could be
18 helpful?

19 A. That was really the only thing I wanted
20 to talk to him about, sir.

21 Q. You wanted to potentially hook him up
22 with a lawyer who could help him?

23 A. Just bring it up to his attention.

24 Q. Okay. And what did he say to that?

25 A. He never responded, sir.

1 Q. He never responded to this text?

2 A. No, sir. He -- we never met, sir, on
3 that date.

4 Q. So there -- there's no difference in this
5 text in your mind between the important things and
6 possible solutions to consider?

7 A. No, that is that; that is the possible
8 solution, that maybe he could have an extra pair of
9 eyes.

10 Q. Okay. Just to get some good advice?

11 A. Yes, sir.

12 Q. Okay. So you're testifying that Mauricio
13 never responded to this?

14 A. Uh-huh.

15 Q. But he does respond -- he does say more
16 things to you, right?

17 A. Yes, sir.

18 Q. So on 10/6, Mauricio says, "Are you going
19 today?"

20 A. Uh-huh.

21 Q. At 7:45?

22 A. Yes, sir.

23 Q. And you say, "I'm not available today,
24 Bro, but I would really love to sync in the morning."

25 A. Uh-huh.

1 Q. He says, "Okay." What -- what is he --
2 what is Mauricio talking about?

3 A. He must have had like a meeting that day,
4 and I wasn't available, sir.

5 Q. Had you been invited to it?

6 A. Based on this conversation, I presume so,
7 sir.

8 Q. But you don't recall what that meeting
9 was as we sit here today?

10 A. No, sir.

11 Q. Had you been -- already been instructed
12 not to interact with Mauricio at this time?

13 A. Not by -- not by Ronak or anybody.
14 Still, I knew that the lawsuit was going on.

15 Q. Did Marvin suggest to you it's not a good
16 idea to interact with Mauricio?

17 A. Marvin did suggest that, sir.

18 Q. When Mauricio suggests this meeting at
19 the Royal Sonesta on 10/8 --

20 A. Uh-huh.

21 Q. -- did you go to that?

22 A. Yes, sir. That's when I basically told
23 him, thank you for the opportunity and, you know,
24 good luck to you with everything in the future
25 endeavors. And just doing my due diligence, sir.

1 Q. And when you say doing your due
2 diligence, do you mean addressing the formalities of
3 quitting your job?

4 A. Yes, sir.

5 Q. Did you give him back anything that you
6 had in your possession from CFX?

7 A. There was one thing that I tried giving
8 back to him, but he deflected.

9 Q. What did you try to give back to him?

10 A. The crypto wallet, sir.

11 Q. And that's the one we've been talking
12 about this whole time?

13 A. Yes, sir.

14 Q. And when you say "tried to give back the
15 wallet," does that mean try to give back the --
16 the --

17 A. The key.

18 Q. -- the pass key to it?

19 A. Yes, sir.

20 Q. Okay. And he deflected, he didn't take
21 it?

22 A. Yes, sir.

23 Q. Did you -- how did you interpret that?

24 A. I mean, I didn't think much of it, sir,
25 other than he just doesn't want to give me time, you

1 know.

2 Q. You didn't think he was making you a gift
3 of whatever was in that wallet?

4 A. No, sir.

5 Q. Okay.

6 A. He just -- he answered a phone call and
7 he said, "Later, later, later." And I was obviously
8 not going to interact with him, you know.

9 Q. At this meeting at 4:30 at the Royal
10 Sonesta Hotel on the 8th, who else was present?

11 A. There were staff members present that
12 day, sir.

13 Q. Is this the entire staff again?

14 A. No. There was -- there was -- I'm just
15 trying to get my dates in order. Everything was hazy
16 that week, lots going on. There was members from
17 accounting team and then random leaders came in.
18 There was one leader from Houston that came in. Her
19 name was Loly (ph). And I remember Anna from
20 accounting was there. Nancy from accounting was
21 there.

22 Q. Is Loly (ph) Marie Seravia --

23 A. I don't know, sir.

24 Q. -- do you know? Okay.

25 A. I just know her by Loly.

1 Q. Okay. Was Orlin Turcios there?

2 A. I don't recall, sir, no.

3 Q. Do you know Orlin Turcios?

4 A. I know who he is, sir.

5 Q. Who is he?

6 A. He's a leader.

7 Q. Where?

8 A. I know he would do presentations in
9 New Orleans, and I knew he would do presentations in
10 Houston.

11 Q. Okay. But you don't know if he was based
12 in Houston or New Orleans?

13 A. (Shakes head.)

14 Q. Okay.

15 A. No, sir. Sorry.

16 Q. And what did -- did Mauricio present to
17 the group at the hotel that day on the 8th?

18 A. He did, sir.

19 Q. What did he say?

20 A. Again, he was trying to -- he was just
21 saying that, like, everything's not true; that he's
22 working on it, to be patient with him; that things
23 are going to get resolved. And it was just a long
24 conversation of it. And I mean, people -- people
25 still showed support, but, you know, not -- it wasn't

1 clear to me that -- I felt a strong sense of morale
2 to say, hey, this is not cool, and I expressed it;
3 and I also expressed that I didn't think it was fair
4 that we had to find out this late.

5 Q. You said that to Mauricio in front of
6 everybody?

7 A. Yes, sir.

8 Q. And how did he react to that?

9 A. He -- in my previous conversations with
10 Mauricio, and this was -- this happened quite a bit,
11 there was always something that just happened in the
12 middle of my speech, whether somebody came in or the
13 subject was rapidly changed, but that is what I
14 recall, sir.

15 Q. And when you're talking about "this"
16 happening before, are you saying -- is this a common
17 thing when Mauricio is presented with information he
18 doesn't like?

19 MR. FLACK: Object to the form of the
20 question.

21 Q. (BY MR. GULDE) You can answer.

22 A. Oh, okay. That is my interpretation,
23 sir. He was on his phone as well.

24 Q. He was on his phone while you were trying
25 to talk to him?

1 my --

2 Q. (BY MS. THEMELI) It's okay. Did
3 Mauricio, say, have a chauffeur or someone who would
4 drive him around?

5 A. Yes.

6 Q. And who would that be?

7 A. It was Mon, and there was also another
8 guy. I don't know his name, though.

9 Q. And did Mon carry a gun?

10 A. I never saw anything.

11 Q. What about the other guy, did he carry a
12 gun? Or I assume it was a guy.

13 A. I don't know.

14 Q. Did Mauricio have a personal computer?

15 A. Yes, ma'am.

16 Q. Was it a desktop?

17 A. It was a Mac Mini that sat on his desk.

18 Q. And we have seen some pictures. And
19 other than that computer you just described, are you
20 aware of any other type of computer, laptop or iPads
21 that Mauricio had?

22 A. His cousin gifted him a custom built
23 computer. It was white. It was underneath his desk
24 as well.

25 Q. Was it an Apple computer?

1 A. A custom built PC.

2 Q. Custom built. And I am a complete
3 ignorant. That's why I'm asking you.

4 A. No, no worries. It was a custom built
5 PC.

6 Q. PC?

7 A. Uh-huh.

8 Q. Did he have any other device that you
9 have seen him other than his phone?

10 A. No, ma'am.

11 Q. An iPad, for example?

12 A. No, ma'am.

13 Q. What type of car did Mauricio drive at
14 the office?

15 A. It was a BMW.

16 Q. We know that CFX had a Facebook account
17 and other social media. Do you know who administered
18 those and who ran those?

19 A. No, ma'am.

20 Q. Was Carlo in marketing? Right?

21 A. Yes.

22 Q. Would he handle -- is it possible that he
23 handled those?

24 A. No, ma'am, I don't think so.

25 Q. And who would know?

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STATE OF TEXAS
COUNTY OF HARRIS

REPORTER'S CERTIFICATE
ORAL VIDEOTAPED DEPOSITION OF
MR. JULIO E. TAFFINDER

December 14, 2022

I, Michelle Hartman, the undersigned
Certified Shorthand Reporter in and for the State of
Texas and Registered Professional Reporter, certify
that the facts stated in the foregoing pages are true
and correct.

I further certify that I am neither
attorney or counsel for, related to, nor employed by
any parties to the action in which this testimony is
taken and, further, that I am not a relative or
employee of any counsel employed by the parties
hereto or financially interested in the action.

1 SUBSCRIBED AND SWORN TO under my hand and
2 seal of office on this 19th day of December, 2022.

3
4 *Michelle Hartman*



5 _____
6 Michelle Hartman, CSR, RPR

7 Texas CSR 7093

8 Expiration: 12/31/23
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