

EXHIBIT G

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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

MS. CARMEN DE LA CRUZ

December 9, 2022

Reported by:
Michelle Hartman
JOB No. 221209WWC

1 Q. Who was that person?

2 A. It is an acquaintance of me and my
3 children from years and his wife. And they are here
4 in Texas because of me.

5 Q. Does he have a name?

6 A. Yes.

7 Q. What is it?

8 A. Christian Sanchez.

9 Q. Is it C-R or C-H-R?

10 A. I don't know, but it is Christian
11 Sanchez.

12 Q. And Christian Sanchez and his wife came
13 to your house?

14 A. Just him.

15 Q. Okay. Did you bring up his wife because
16 she was an investor, too?

17 A. Yes.

18 Q. Okay. How much had Christian and his
19 wife invested with CFX?

20 A. A total of 38,000.

21 Q. Were they 38,000 out of pocket or is
22 38,000 the total amount of return?

23 A. It was -- it was not the returns. It was
24 like, for example, he would get a contract for
25 10,000, a friend of him that lived in New York and

1 imagine, he would get the bonuses. And then that
2 friend in New York, there is another contract for
3 10,000, and he gets the bonus; and then Christian's
4 wife makes another contract, and they get the bonus
5 themselves. Those two friends of the wife that she
6 invited, one was 5,000 and the other one was 6,000.
7 So it was a whole sum of 38,000.

8 Q. Okay. So that 38,000 included the amount
9 that Christian and his wife had invested, whatever
10 bonuses and sponsorship payments they were owed?

11 A. No, that was not -- the bonus were not
12 included, the bonus were paid immediately.

13 Q. Oh, they had already gotten them?

14 A. Yes, uh-huh.

15 Q. Okay. So just to be clear -- well, do
16 you know how much that was?

17 A. No, no, I don't remember, but they
18 invited those people and they earn those bonuses.

19 Q. Okay. So after having received those
20 bonuses, CFX still owed Christian and his wife
21 \$38,000?

22 A. Christian, the wife, and the friend that
23 they brought.

24 Q. What is Christian's wife's name?

25 A. Marayeline Caputo.

1 Q. Is the first name Maura or Maria?

2 A. Marayeline.

3 THE INTERPRETER: Per interpreter: The
4 witness explained that the first name of the investor
5 is Marayeline, M-A-R-A-Y-E-L-I-N-E.

6 Q. (BY MR. GULDE) Sanchez?

7 A. Caputo.

8 Q. And then who were the friends?

9 A. Their friend, I don't remember.

10 Q. But were they present the day that
11 Christian came?

12 A. No, it was just Christian. You mean when
13 he came to my house?

14 Q. Yes.

15 A. And then the wife came over to apologize
16 crying.

17 Q. Did Christian bring a weapon when he came
18 to your house alone?

19 A. Yes.

20 Q. Okay. What kind of weapon was it?

21 A. I don't know. I got very nervous. I
22 never been in a situation like that. I almost
23 fainted. So my son, who is young and knows him,
24 well, he opened the door for him; and I was in my
25 room, and I was very nervous. And in that scene, he

1 told me that I had to take him to the place where
2 Orlin lived.

3 Q. Was it a pistol or was it a rifle?

4 A. A pistol.

5 Q. And did he have it in a holster? Was he
6 holding it in his hand?

7 A. In his hand.

8 Q. The entire time he was at your house, did
9 he have a pistol in his hand?

10 A. Yes.

11 Q. Did he have the contracts of him, his
12 wife, and his friends with him?

13 A. No.

14 Q. And he demanded to see Orlin?

15 A. Yes.

16 Q. And what did you do?

17 A. I told him, "Orlin has his family, you
18 have your family, I have my family. You have to
19 leave my house." And he told me that he didn't care
20 about the families at that moment, but that he was
21 not going to hurt me, but that he wanted to hurt
22 Orlin.

23 Q. And so what did you do?

24 A. I told him to leave my house, to leave
25 and to think about his daughters, I told him.

1 Q. And did he?

2 A. Yes.

3 Q. And what happened after that?

4 A. I called Orlin and I told him what had
5 happened, and I told him that I was very scared; and
6 that's when he told me that he was going to call
7 Mauricio to tell him all about it.

8 And I told him that my two sons have had
9 serious problems after the scene, because my oldest
10 son asked the youngest son why he had opened the door
11 without my permission, and the youngest one said that
12 since because he knew him, he had opened the door.
13 And the other one told him that "Nobody, not even to
14 our dad," who is my former husband, "you should open
15 the door. If they are not supporting us, you should
16 not open the door to anybody."

17 So they were speaking mainly in English,
18 and I didn't understand a lot of English, but I saw
19 that both of them were very upset. And I asked them
20 to explain to me in Spanish. They explained me, so
21 kindly I told them that both of them were right.

22 And then I called Orlin and Orlin was
23 able to get in touch with Mauricio and I told him
24 about that threat, about the -- the stress that was
25 caused to my sons that was so strong, and also that I

1 was afraid to go out to the street. So Orlin called
2 Mauricio and Mauricio sent the money to him.

3 Q. Mauricio sent the money to Orlin?

4 A. That's what I understand.

5 Q. And you understand it's from Orlin?

6 A. Yes.

7 Q. Is it your understanding that that money
8 got to Christian?

9 A. Yes.

10 Q. And what is the basis of that
11 understanding?

12 A. Because I handed it to the wife. Orlin
13 gave it to me, and then I called the wife and I told
14 her that Christian could not be present because
15 otherwise I was going to call the police. And the
16 wife came with two people that she had invited, and I
17 got her to sign for me that she had received this
18 money already so I could give to Orlin that signed
19 receipt that she had received the money. She brought
20 the contract and she signed them in receipt.

21 Q. And you gave that receipt to Orlin?

22 A. Yes. Yes.

23 Q. How much money was it?

24 A. \$38,000.

25 Q. And that's exactly what they had been

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STATE OF TEXAS
COUNTY OF HARRIS

REPORTER'S CERTIFICATE
ORAL VIDEOTAPED DEPOSITION OF
MS. CARMEN DE LA CRUZ
December 9, 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 14th day of December, 2022.

3
4
5 *Michelle Hartman*



6 Michelle Hartman, CSR, RPR

7 Texas CSR 7093

8 Expiration: 12/31/23
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