

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

SECURITIES AND EXCHANGE  
COMMISSION,

*Plaintiff*

v.

MAURICIO CHAVEZ, GIRGIO  
BENVENUTO, and CRYPTOFX, LLC,

*Defendants.*

CBT GROUP, LLC,

*Relief Defendant.*

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CIVIL ACTION NO. 4:22-CV-3359

**DECLARATION OF KEVIN BAJURIN**

I, Kevin Bajurin, hereby declare and state as follows:

1. I have personal knowledge of the facts stated herein, and I could and would testify competently to those facts if called upon to do so.
2. I am the Law Enforcement Response Manager for Blockchain.com, Inc. (“Blockchain.com”).
3. On September 29, 2022, I received a copy of the Order on Preliminary Injunction (Dkt. 10) and Order Appointing Receiver (Dkt. 11) in the above-captioned matter.
4. Pursuant to paragraph 16 of the Order Appointing Receiver (Dkt. 11), I conducted a review of Blockchain.com records for any accounts or assets held by, in the name of, or for the benefit of, directly or indirectly, the following individuals and entities: Mauricio Chavez, Girgio Benvenuto, CryptoFX, LLC, and CBT Group, LLC.

5. Blockchain.com does not have records of accounts or assets held by, in the name of, or for the benefit of, directly or indirectly, the following individuals and entities: Girgio Benvenuto, CryptoFX, LLC, and CBT Group, LLC.

6. Blockchain.com has records of five accounts held by, in the name of, or for the benefit of, directly or indirectly, Mauricio Antonio Chavez.

7. Four of the five accounts held by Mauricio Antonio Chavez are self-custodied accounts.

8. Blockchain.com does not collect, retain, or have access to account balance information for self-custodied accounts.

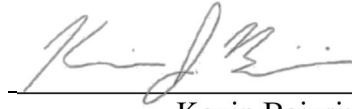
9. Mauricio Antonio Chavez's custodial account includes two categories of assets: (1) assets held in the account and (2) assets held pending withdrawal by Blockchain.com for the benefit of the account.

10. Pursuant to the Temporary Restraining Order (Dkt. 2) and Order Appointing Receiver (Dkt. 11) in the above-captioned matter, Blockchain.com has frozen all accounts associated with the Defendants and Relief Defendant. Funds held by Blockchain.com for the benefit of Mauricio Antonio Chavez's account pending withdrawal will remain as such pending further instruction from the Court or Receiver.

11. The table attached as **Exhibit 1** lists Mauricio Antonio Chavez's five Blockchain.com accounts, denotes whether each account is self-custodied or custodial, and includes balances as of September 29, 2022 for the custodial account.

12. I hereby certify that **Exhibit 1** is a true and correct copy of the statement of accounts held by, in the name of, or for the benefit of, directly or indirectly, Mauricio Antonio Chavez.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Dated this 5th day of October, 2022 in Rohnert Park, California.

A handwritten signature in black ink, appearing to read "Kevin Bajurin", is written above a horizontal line.

Kevin Bajurin

**Exhibit 1**

<b><u>Name on Account</u></b>	<b><u>Account User ID</u></b>	<b><u>Account Balance as of September 29, 2022</u></b>
Mauricio Antonio Chavez	24f41b5c-cf79-4714-97c6-f70395f66862	<i>N/A (Self-Custodied Account)</i>
Mauricio Antonio Chavez	79d36148-ad30-4f6c-b51f-c597468f8c1c	<i>N/A (Self-Custodied Account)</i>
Mauricio Antonio Chavez	7ea1c251-5643-4d3c-b65d-78d590d04aa2	<i>N/A (Self-Custodied Account)</i>
Mauricio Antonio Chavez	e20874af-54ff-4aaa-a33f-c4d58b1646bd	<i>N/A (Self-Custodied Account)</i>
Mauricio Antonio Chavez	32554673-7528-4313-9a40-29d67b43c31d	<p>Account Balance</p> <ul style="list-style-type: none"> <li>• BTC: 0.318082480</li> <li>• ETH: 0.270039250</li> <li>• USDT: 0.015131000</li> </ul> <p>Funds Held Pending Withdrawal</p> <ul style="list-style-type: none"> <li>• BTC: 11.7955</li> <li>• USDT: 912,994.014085</li> </ul>