

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:21-cv-23472-RNS

Ryan Birmingham, Roman Leonov, Steven Hansen, Mitchell Parent, and  
Jonathan Zarley, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

Alex Doe; John Does 1–3; Peter Mohylny; Ester Holdings Inc.; The  
Investing Online; Vsevolod Tovstun; Borys Konovalenko; Mayon Holding  
Ltd; Mayon Solutions, LLC; Mayon Solutions Ltd; Marina Garda; Daria  
Eckert; Olga Tielly; Anna Shymko; Timothy Stubbs; Wealthy  
Developments LP; Anton Bilous; Aware Choice Ltd; Ivan Hrechaniuk;  
Profit Media Group LP; VDD-Trading, Ltd; Dmytro Fokin; Manuchar  
Daraselia; Olga Abrykosova; Auro Advantages, LLC; Notus, LLC; Alla  
Skala; Shopostar, LLC; Nataliya Los; Global E-Advantages LLC; Easy  
Com, LLC; Jase Victor Davis; Grovee, LLC; Jared Goodyear; Brass Marker  
s.r.o.; Sergiy Prokopenko; Trans-Konsalt MR Ltd; IT Outsourcing Co., Ltd;  
Art Sea Group Ltd; ePayments Systems Ltd; Boonruk Ruamkit Co., Ltd;  
Nattpemol Krinara; and Papahratsorn Raviratporn,

**CLASS ACTION**

Defendants.

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**AMENDED COMPLAINT<sup>1</sup>**

Plaintiffs Ryan Birmingham, Roman Leonov, Mitchell Parent, Jonathan Zarley, and Steven  
Hansen (“Plaintiffs”), individually, and on behalf of all others similarly situated, bring suit against  
the captioned Defendants.

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<sup>1</sup> This version of the Amended Complaint corrects a few scrivener’s errors appearing in the  
Proposed Amended Complaint attached to the Motion for Leave to Amend—specifically,  
misspellings of the name of one Defendant; repeating one Defendant in the case caption; and using  
the incorrect font size in footnotes. It is otherwise identical to the Proposed Amended Complaint  
attached to the Motion for Leave to Amend [ECF No. 61-1].

## NATURE OF THE ACTION

1. Between 2018 and 2021, Plaintiffs and similarly situated customers were victims of a nearly \$75 million international scheme that defrauded them of money or cash equivalents. The scheme—hosted entirely on RoFx.net<sup>2</sup>—lured victims with a purported “robotically operated foreign exchange trading” platform, which promised safe, easy, and highly lucrative profits (hereinafter “RoFx”, “RoFx Scheme”, or “Scheme”).

2. The RoFx Scheme revolved around a supposed artificially intelligent algorithm which could identify profitable foreign exchange trades to be executed by third-party brokers. Customers were enticed to contribute their funds to the Scheme—and, in return for a service fee, customers would earn passive income, courtesy of the RoFx software and its network of brokers. The Scheme was promoted online via, inter alia, elaborately crafted sponsored content disguised as legitimate financial reporting—which was cited or republished by major news outlets.

3. The entire Scheme was an online fiction. There is no RoFx entity running any smart trading software. No foreign exchange trading was done using RoFx customer funds. The RoFx Scheme had only one purpose: steal as much money as possible from their “customers” and keep them from realizing what was actually happening until it was too late. And for nearly four years the RoFx Scheme was wildly successful, bilking unsuspecting victims of \$75 million or more. The Scheme was fictitious but the harm very real.

4. After obtaining monies from their victims, the persons operating the RoFx Scheme (the “RoFx Operators”) laundered the funds through a complicated, globe-sprawling web of ever-shifting shell companies and financial institutions. This next phase—the Money Laundering

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<sup>2</sup> The operators of the RoFx Scheme appear to have migrated their entire scheme to other websites—and are brazenly continuing to foist their Scheme on other unsuspecting victims.

Enterprise—includes dozens of persons and entities spanning at least three continents. Defendants went to extraordinary lengths to steal *and* conceal.

5. However, despite their best efforts, Plaintiffs and their counsel have begun to unravel the shroud of secrecy and confusion Defendants created with such deliberate care and caution. Plaintiffs now bring this action on behalf of a global class of RoFx customers under Federal Rule of Civil Procedure 23. Plaintiffs, on behalf of the class, bring claims for Defendants' (I) Violations of the Racketeer Influenced and Corrupt Organizations ("RICO") Act, 18 U.S.C. § 1962(c); (II) RICO Conspiracy in violation of 18 U.S.C. § 1962(d); (III) Fraud; (IV) Conspiracy to Commit Fraud; (V) Aiding and Abetting Fraud; (VI) Conversion; (VII) Conspiracy to Commit Conversion; (VIII) Aiding and Abetting Conversion; and (IX) Unjust Enrichment.

#### **JURISDICTION AND VENUE**

6. This Court has subject matter jurisdiction over this action under 28 U.S.C. § 1331 because the action arises under the laws of the United States—specifically, the RICO Act, 18 U.S.C. §§ 1962 and 1964. The Court also has subject matter jurisdiction under 28 U.S.C. § 1332(d)(2): this is a civil class action with an amount in controversy exceeding \$5,000,000, exclusive of interest and costs; and minimal diversity exists. Specifically, at least one Plaintiff is a citizen of a State and numerous defendants are citizens of foreign states.

7. This Court has personal jurisdiction over Defendants under 18 U.S.C. § 1965(b) because the ends of justice requires the geographically disparate Defendants be brought before this Court to answer for their unlawful conduct, as they went to great lengths to inflict injury on Plaintiffs and the Class and to conceal their involvement in the conduct alleged herein.

8. The Court also has general personal jurisdiction under Fla. Stat. § 48.193(2), as the RoFx Operator Defendants engaged in substantial and not isolated activity within Florida;

specifically, the RoFx Operator Defendants operated an entirely online scam through a website and domain hosted by a company in Florida; and purported to have a place of business in Miami, Florida. The Court also has specific personal jurisdiction over the RoFx Operator Defendants under Fla. Stat. § 48.193(1)(a)(1), because the RoFx Operators conducted, operated, engaged in, or carried out a business in Florida.

9. Personal Jurisdiction over each Defendant is also proper under Fla. Stat. § 48.193(1)(a)(2) because Florida residents were harmed, in Florida, by Defendants' tortious acts in Florida directed into Florida by Defendants, or Defendants conspired to commit or aided and abetted such tortious acts.

10. Alternatively, the Court has personal jurisdiction over Defendants under Fed. R. Civ. P. 4(k)(2) for the federal claims herein, for any Defendants not subject to the jurisdiction of any state's courts—because doing so would be consistent with due process.

11. Venue is proper in this District under 28 U.S.C. § 1391(b)(3). The action cannot be brought under § 1391(b)(1) or (2): Defendants are spread across numerous domestic and foreign States and there is no single judicial district in which a substantial part of the events giving rise to the claims herein occurred. Section 1391(b)(3) thus applies because at least one Defendant is subject to this Court's personal jurisdiction with respect to the action.

## **PARTIES**

### **I. Plaintiffs**

12. **Ryan Birmingham** is a RoFx customer and citizen and resident of Leeds, Maine.
13. **Roman Leonov** is a RoFx customer and citizen and resident of Miami, Florida.
14. **Mitchell Parent** is a RoFx customer and citizen and resident of Fort Myers, Florida.

15. **Jonathan Zarley** is a RoFx customer and citizen and resident of Kamuela, Hawaii.

16. **Steven Hansen** is a RoFx customer and citizen and resident of Gilbert, Arizona.

## II. Defendants

### A. Operators of the RoFx Scheme

17. **“Alex” Doe**<sup>3</sup> directed key aspects of the RoFx Scheme and is a citizen of Ukraine.

18. **John Does 1–3** (collectively with Alex, the **“RoFx Operators”**) operated the RoFx Scheme and, upon information and belief, are each citizens of Ukraine.

19. **Peter Mohylny** is a Ukrainian resident. Upon information and belief, Mohylny is a Ukrainian citizen who, as agent of the RoFx Operators, managed and paid for the RoFx.net domain from which the RoFx Scheme emanated.

### B. Promoters of the RoFx Scheme

20. **Ester Holdings Inc.**, now de-registered, was a corporation organized in Vanuatu with a principal place of business in Cyprus. Ester also purports to be incorporated in the British Virgin Islands with a customer support address in Switzerland. Ester is thus a citizen of several foreign states.

21. **The Investing Online** is an entity of unknown citizenship.

### C. Money Laundering Defendants

#### Company Organizers<sup>4</sup>

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22. **Vsevolod Tovstun** is a Ukrainian citizen and agent of Alex with respect to the RoFx Scheme, focused on creating Front Companies for the Money Laundering Enterprise.

23. **Borys Konovalenko** is a Ukrainian citizen and current manager of Mayon Solutions, LLC; and is director and 70% shareholder of Mayon Holding Ltd. He played a pivotal

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<sup>3</sup> “Alex” may be a pseudonym, but he is referred to as Alex hereinafter.

<sup>4</sup> Company Organizers’ roles within the RoFx Scheme are described *infra* Part III.C.

role in forming Defendants Shopostar LLC, Notus LLC, Global E-Advantages LLC, and Easy Com LLC.

24. **Mayon Holding Ltd** is a limited company organized and with a principal place of business in Hong Kong, and thus a citizen of Hong Kong, China. It is the ultimate parent of Mayon Solutions, LLC; and Mayon Solutions Ltd.

25. **Mayon Solutions, LLC** is a New Hampshire limited liability company currently managed by Konovalenko. Mayon Holding Ltd is the sole member of Mayon Solutions, LLC, making it a citizen of China.

26. **Mayon Solutions Ltd** is a private limited company organized and with a principal place of business in the United Kingdom, and thus a citizen of the United Kingdom. Its sole shareholder is Mayon Holding Ltd. Konovalenko is the Co-Founder and Executive Director of Mayon Solutions Ltd.<sup>5</sup>

27. **Marina Garda** is a citizen of Hungary and was an owner of Mayon Holding Ltd.

28. **Daria Eckert** is a citizen of Ukraine and was manager of Mayon Solutions, LLC.

29. **Olga Tielly** is a United Kingdom citizen and was a director of Mayon Solutions Ltd.

30. **Anna Shymko** is a Ukrainian citizen who formed Defendant Easy Com, LLC and purchased—and then dissolved—Defendant Notus, LLC.

31. **Timothy Stubbs** is a citizen of Mississippi or Georgia. Stubbs manages Defendant Grovee, LLC. Stubbs' Mississippi addresses are associated with company filings from Notus, Shopostar, Borys Konovalenko, Nataliya Los, Anna Shymko, and Alla Skala.

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<sup>5</sup> Borys Konovalenko, LINKEDIN, <https://www.linkedin.com/in/boriskonovalenko?trk=org-employees> (last visited Jan. 31, 2022).

***Front Companies and Principals<sup>6</sup>***

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**Front Companies in the United Kingdom**

32. **Wealthy Developments LP** is a limited partnership organized and with a principal place of business in Scotland.

33. **Anton Bilous** is a Ukrainian citizen and partner of Wealthy Developments LP.

34. **Aware Choice Ltd** was a private limited company organized and with a principal place of business in the United Kingdom, and thus a citizen of the United Kingdom. Aware Choice is now dissolved.

35. **Ivan Hrechaniuk** is a United Kingdom citizen and was a director of Aware Choice.

36. **Profit Media Group LP** is a limited partnership organized and with a principal place of business in Scotland.

37. **VDD-Trading, Ltd** was a United Kingdom limited company with a principal place of business in the United Kingdom, and thus a citizen of the United Kingdom. VDD is now dissolved.

38. **Dmytro Fokin** is a Ukrainian citizen and was a director of both Aware Choice and VDD-Trading.

39. **Manuchar Daraselia** is a Ukrainian citizen and was a director of VDD-Trading.

**Front Companies in the United States**

40. **Olga Abrykosova** is a Ukrainian citizen and agent of Alex with respect to the RoFx Scheme, focused on the Money Laundering Enterprise and United States-based Front Companies.

41. **Auro Advantages, LLC** is a Delaware limited liability company.

42. **Notus, LLC** was a Colorado limited liability company and is now dissolved.

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<sup>6</sup> Front Companies' roles within the RoFx Scheme are described *infra* Part III.C.

43. **Alla Skala** is a Canadian citizen and a member of Notus, LLC.
44. **ShopoStar, LLC** is a Colorado limited liability company with its sole member, Nataliya Los, a Ukrainian citizen; ShopoStar is thus also a Ukrainian citizen.
45. **Nataliya Los** is a Ukrainian citizen and member of ShopoStar, LLC.
46. **Global E-Advantages LLC** is a Delaware limited liability company.
47. **Easy Com, LLC** is a New Hampshire limited liability company whose sole member is a citizen of Missouri, making Easy Com a citizen of Missouri.
48. **Jase Victor Davis** is a citizen of Mississippi and member of Easy Com, LLC.
49. **Grovec, LLC** is a Delaware limited liability company.
50. **Jared Goodyear** is a citizen of South Carolina.
51. Front Companies in Other Jurisdictions
52. **Brass Marker s.r.o.** is a limited liability company organized and with a principal place of business in the Czech Republic, and thus a citizen of the Czech Republic.
53. **Sergiy Prokopenko** is a Czech citizen and officer of Brass Marker s.r.o.
54. **Trans-Konsalt MR Ltd** is a limited company organized and with a principal place of business in Bulgaria, and thus a citizen of Bulgaria.
55. **IT Outsourcing Co., Ltd** is a limited company organized and with a principal place of business in Thailand, and thus a citizen of Thailand.
56. **Art Sea Group Ltd** is a limited company organized and with a principal place of business in South Korea.



*Layering Companies and Principals*<sup>7</sup>

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57. **ePayments Systems Ltd** is a limited company organized and with a principal place of business in the United Kingdom, and thus a citizen of the United Kingdom.

58. **Boonruk Ruamkit Co., Ltd** is a limited company organized and with a principal place of business in Thailand, and thus a citizen of Thailand.

59. **Nattpemol Krinara** is a citizen of Thailand and managing director of Boonruk Ruamkit and IT Outsourcing.

60. **Papahratsorn Raviratporn** is a citizen of Thailand and shareholder of Boonruk Ruamkit and IT Outsourcing.

### **III. Substantive Allegations**

#### **A. The RoFx Scheme**

61. The **RoFx Operators** purportedly developed a foreign exchange (“forex”) trading robot—a software algorithm employing artificial intelligence to automate forex trading decisions.

62. The RoFx Operators offered customers an opportunity to contribute their money to the Scheme. In exchange for a service fee, the RoFx Operators would use their software to direct third-party brokerages to make highly lucrative foreign exchange trades on behalf of the customers, who would passively reap substantial profits.

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<sup>7</sup> Layering Companies’ roles within the RoFx Scheme were frequently hybrid and are described *infra* Part III.C.

### ***RoFx.net Representations***

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63. Via the website RoFx.net, the RoFx Operators made numerous representations to encourage customers to contribute money to the Scheme.

64. RoFx.net described the RoFx robot as a “fully automated Forex trading solution,” and touted that “YOU NO LONGER NEED ANY SPECIAL KNOWLEDGE, OR TRADING EXPERIENCE!”

### ***Using the RoFx Robot was Purportedly Safe and Customers Could Freely Withdraw Funds***

65. RoFx.net claimed to operate from offices in the United States, London, and Hong Kong, providing RoFx with the façade of a legitimate international company.

66. RoFx.net customers could contact RoFx at the phone numbers listed for each office, a website-based chat system, or by email. The RoFx Operators were responsive to customers through each channel, contributing to the illusion of an actual enterprise.

67. RoFx.net contained an extensive Frequently Asked Questions (“FAQ”) designed to reassure customers by emphasizing the longevity and widespread adoption of the RoFx robot:

**WHO ARE WE?**

RoFx is the team of software developers and traders with significant experience in the international currency and financial markets. In 2009, we created the robotic system and tested it in real trading. The RoFx robot has been demonstrating positive trading dynamics since 2010. This means that over the past 8 years the number of successful bids significantly exceeds the number of unprofitable ones. In 2010, we decided to grant access to the RoFx signals to the public to invite investments and thus to increase the company's working capital. The RoFx robot is a complex innovative system that helps you trade on FOREX without knowing anything about trading. It is fully automated high-tech system that is based on Artificial Neural Network. We invest your money with safety of bank deposit and profitability of Forex & Crypto market

**WHAT IS THE RoFx ROBOT?**

The RoFx robot is a complex innovative system that helps you trade on FOREX without knowing anything about trading. The robot algorithms are set to analyze the market on the 24/7 basis and to make bids with a minimum risk. Therefore, RoFx brings regular dividends to its customers. . . . .

**WHY SHOULD I TRUST YOU?**

RoFx has been on the market since 2009 and have got more than 50,000 satisfied customers all over the world. Every business is created by people and survives by benefiting other people, we wouldn't survive if our Customers didn't trust us. Our robot has started showing positive dynamics since 2010, that means that over the past 8 years the number of successful bids made by the robot significantly exceeds the number of unprofitable ones. Our team is constantly improving our AI technology by developing new algorithms and upgrading the system, striving to deliver the best service to our Customers. Today, more than 30,000 people around the world get passive income with RoFx.

68. The RoFx.net FAQ contained representations regarding the minimal risk and safety of customers' funds (emphasis added below):

**IS IT POSSIBLE TO LOSE MONEY?**

The stop-loss system is set to minimize your losses on bad days. The company uses no leverage. This means the company never borrows money and is trading only with its own funds and its customers' funds, which significantly minimizes the trading risks.

**The company guarantees the safety of your funds.** This means that when the company suffers a loss its customers make no profit, and any losses are compensated from the reserve fund of the company.

69. RoFx.net further represented that customers could “withdraw [their] available balance [at] any time.”

70. RoFx.net also explained that it worked with regulated brokers who conducted the actual foreign exchange trading, further providing the RoFx Scheme with an aura of legitimacy:

**IS RoFx REGULATED?**

Being a software company, owners of AI technology and a managing company RoFx does not need to be regulated. RoFx cooperates with top European, American and Asian brokerage platforms, licensed and regulated by the corresponding authorities.

**Investing with the RoFx Robot Was Purportedly Extremely Profitable**

71. RoFx.net published trading statistics demonstrating the purported performance of the RoFx robot. These statistics showed 83% or greater annual profit since 2009 with an average annual profit during this time of 92.8%.



Figure 1: Profit Statistics Posted on RoFx.net

72. RoFx.net provided a “profit margin calculator” which purported to provide expected investment gains depending on the investment amount and length of trading period. Daily profits ranged from .38% to .97%. *See Ex. 1, RoFx Feature Emails, at 3.*

The screenshot shows a web interface for a "Profit Margin Calculator". At the top left, it says "YOU CAN CALCULATE YOUR PROFIT:". Below this is a form with the following elements: "Amount in:" followed by two buttons, "USD/EUR" (highlighted in blue) and "BTC"; an input field labeled "Enter amc"; a dropdown menu labeled "Select tra"; and a large blue button labeled "CALCULATE NOW". To the right of the form is a heading "Profit Margin Calculator" and two paragraphs of text. The first paragraph explains the calculator's purpose: "Find out your expected ROI on desired investment amount in our Profit Margin Calculator. How to calculate gains from trade: enter the start amount deposit in the trade calculator to compute your earnings." The second paragraph provides a note: "Note that it is an estimated amount of the revenue you can get. The calculations are based on the average RoFx robot's trading performance of 0.38% for platform V1.0 and 0.97% for platform V2.0. This Bitcoin profit calculator will display the profits in both Bitcoin and USD/EUR over various time periods (daily/monthly/after the trading period balance). The profit calculator options also include the deduction of the performance fee, thus you are shown the net income accrued out of your deposit after a certain trading period."

**RoFx Customers Were Rewarded for Maintaining Large Account Balances**

73. RoFx.net divided customers into tiers based on account balance—incentivizing customers to contribute large amounts and maintain large account balances for larger returns:

USD/EUR		BTC	
<p><b>ADVANCED COMPOUND Trial</b></p> <p>1,000 – 5,000 Amount (USD/EUR)</p> <p>Manual Trading Period Selection<sup>1</sup></p> <p>50 Your share in the daily trading profit (%)</p> <p>50 Performance fee (%)</p>	<p><b>ADVANCED COMPOUND Easy start</b></p> <p>5,000 – 10,000 Amount (USD/EUR)</p> <p>Manual Trading Period Selection<sup>1</sup></p> <p>60 Your share in the daily trading profit (%)</p> <p>40 Performance fee (%)</p>	<p><b>ADVANCED COMPOUND Moneymaker</b></p> <p>10,000 – 50,000 Amount (USD/EUR)</p> <p>Manual Trading Period Selection<sup>1</sup></p> <p>75 Your share in the daily trading profit (%)</p> <p>25 Performance fee (%)</p>	
<p><b>ADVANCED COMPOUND Gold</b></p> <p>50,000 – 100,000 Amount (USD/EUR)</p> <p>Manual Trading Period Selection<sup>1</sup></p> <p>85 Your share in the daily trading profit (%)</p> <p>15 Performance fee (%)</p>	<p><b>ADVANCED COMPOUND VIP</b></p> <p>100,000 – UNLIMITED Amount (USD/EUR)</p> <p>Manual Trading Period Selection<sup>1</sup></p> <p>95 Your share in the daily trading profit (%)</p> <p>5 Performance fee (%)</p>	<p><sup>1</sup> You can manually select the package trading period from the following options:</p> <ul style="list-style-type: none"> <li>- 120 trading days</li> <li>- 160 trading days</li> <li>- 270 trading days</li> <li>- 360 trading days</li> </ul> <p><b>Advantages of Advanced Compound Packages:</b></p> <ul style="list-style-type: none"> <li>- profit compounding by default without updating the trading period</li> <li>- add funds option do not roll over trading period of package</li> <li>- the highest profit as compared to all packages</li> </ul>	

74. RoFx.net also encouraged large customer contributions and account balances by offering “VIP clients whose accounts balance start from \$100,000” the opportunity to apply for a special annual VIP conference available only to those “VIP” clients.

75. RoFx.net offered a referral program incentivizing current customers to recruit others into the Scheme, offering a 2% “referral payment” based on the current customer’s account balance—thus, the larger the balance, the more each referral payment was worth.

76. To further the illusion of security and legitimacy, the RoFx Operators published on RoFx.net a personalized data dashboard for each customer, which purported to show customers their account balances and profits earned via the Scheme.

***RoFx Representations via Emails to RoFx Customers***

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77. Between 2018 and September 2021, the RoFx Operators sent new RoFx users emails substantially similar to the below:

We are happy to inform you that you have successfully validated your account.  
Functions "Fund account" and "Withdrawal" without limitation are available for you now.

**WITH US YOU RECEIVE:**

- \* Up to 12% monthly profit
- \* Safety of your start deposit
- \* Loss coverage guarantee
- \* No prior experience or knowledge required
- \* User friendly interface
- \* Fully automated trading process (we do all work for you, you just receive your profit)

RoFx -- is the Power to Invest Your Money with Safety of Bank Deposit and Profitability of Forex & Crypto Market!

In case you need any assistance, do not hesitate to contact us by email, chat or phone and one of our Customer Support Managers will personally help you.

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44-20-3936-1401 (UK)  
+1-888-631-2337 (USA)



78. Between 2018 and September 2021, the RoFx Operators also sent numerous emails via the RoFx.net domain to all existing RoFx customers, reinforcing the representations made via RoFx.net.

- a. Emails emphasized continued improvements and tweaks to RoFx account packages and website features, including the aforementioned RoFx.net Profit Calculator. *See* Ex. 1 at 2–3.
- b. Several emails reference “thousands” of customers, “numerous” requests for changes to RoFx services, and the popularity of RoFx account packages, implying that RoFx could be trusted due to its widespread adoption. *See* Ex. 1 at 4–6.
- c. Other emails encouraged RoFx customers to keep funds in the scheme by advertising different lock-in packages that would provide increased profitability for customers willing to commit funds to the Scheme. *See* Ex. 1 at 2.
- d. On September 3, 2021, the RoFx Operators sent an email to all customers prompting them to apply for a January 20, 2022 “VIP Conference” in London only available to customers with an account balance of \$100,000 or more. *See* Ex. 1 at 7.

***RoFx Representations via Third-Party Websites***

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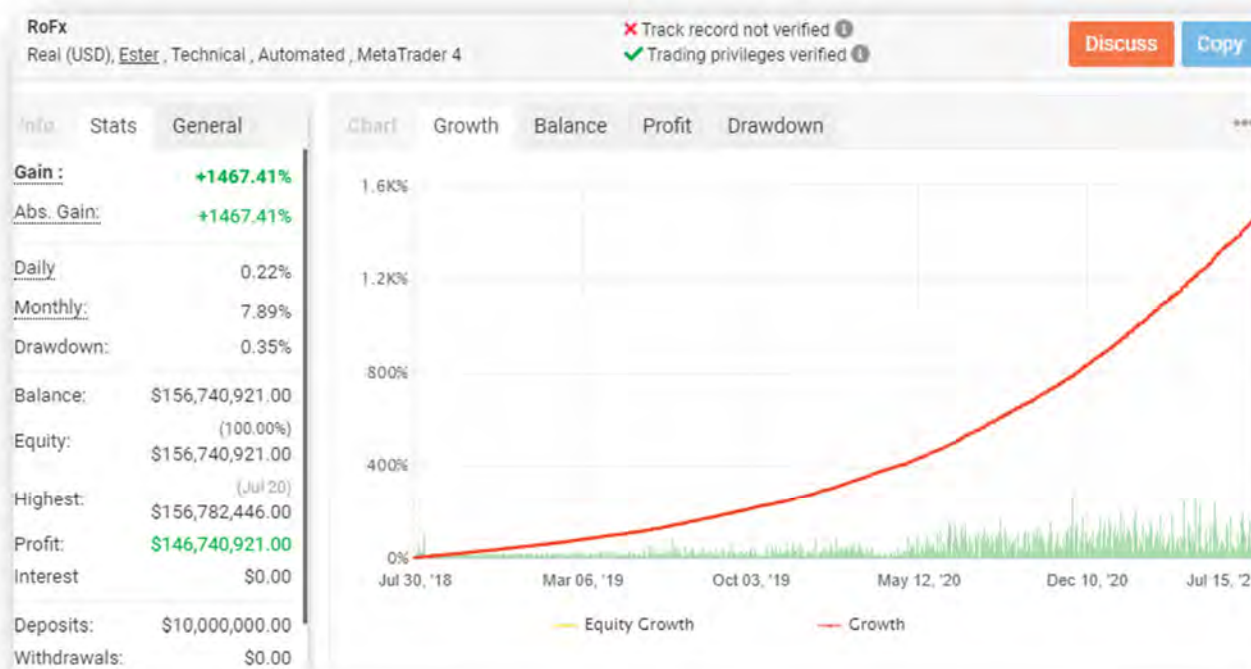
79. Together with the **Promoter Defendants**, the RoFx Operators published, or caused to be published, numerous representations on other websites to attract customers to the RoFx Scheme by creating an aura of legitimacy and trustworthiness.

80. Reader’s Digest, a once-trusted household publisher, hosted, and as of January 31, 2022, continues to host, a glowing review of RoFx.net on their website, [www.readersdigest.co.uk](http://www.readersdigest.co.uk), entitled “RoFx Review: Safe and trusted way for steady passive income”:

The problem with most trading robots in the market is that they offer great results for a certain period but fail to keep up the performance for a long time. The ridiculous claims of the robots to give you 200% monthly gain are meaningless with little to no backtesting history. Novice traders are easily fooled by these scammers. RoFx, however, provides the traders with a clear and straightforward concept through an easy-to-use user interface. Daily gains made by the robot, verified records of MyFxBook, and 24/7 customer support show the credibility of the robot. The 8%-10% monthly gain offered by the robot is enough to make any professional trader happy.

The Reader's Digest article specifically references "verified records of MyFxBook" providing a trading history that shows the credibility and reliability of the RoFx trading robot.

81. MyFxBook publishes trading activity of entities providing it trading data.<sup>8</sup> At the direction of the RoFx Operators, from July 2018 to July 2021, Promoter Defendant **Ester Holdings** published purported daily RoFx trading activity on MyFxBook.com. The published trading activity was consistent with RoFx profitability claims.



82. Between January 2018 and July 2021, the RoFx Operators hired Promoter Defendant **The Investing Online** to author, publish, and distribute several articles describing the RoFx Scheme. The Investing Online articles emphasized the innovative nature of the RoFx trading robot and the longevity and widespread adoption of the RoFx robot by tens of thousands of customers, consistent with the claims published on RoFx.net. The Investing Online articles were

<sup>8</sup> MyFxBook offers trading audit services, but verification of trades is not required for publishing trades on MyFxBook.

then re-published or cited by scores of websites, often parroting the original language word-for-word. *See* Ex. 2; Ex. 3, Articles Promoting RoFx IPO, at 13–14.

83. Between January 2018 and September 2021, the RoFx Operators created and distributed, or caused to be created and distributed, advertisements eventually published via FaceBook and Reddit. These advertisements parroted the same representations made by the RoFx Operators on the RoFx.net website.

84. Between June 7, 2018, and September 21, 2021, the RoFx Operators published, or caused to be published, dozens of glowing reviews of the RoFx Scheme on the website Trustpilot at <https://www.trustpilot.com/review/www.rofx.net>. These positive reviews emphasize the safety, profitability, accessibility, transparency, and longevity of the RoFx Scheme. *See* Ex. 4, Trustpilot Reviews.

#### ***The RoFx Initial Public Offering and Initial Coin Offering***

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85. In late 2020, the RoFx Operators represented their intent to take the RoFx robot public via an initial public offering (“IPO”).

86. On September 11, 2020, the RoFx Operators sent the following email to all RoFx customers, with the subject “RoFx: pre-IPO”:

Many of you are already aware that RoFx is preparing for an IPO (Initial Public Offering) in the third quarter of 2021.

We have been receiving multiple requests from you if we are going to have the pre-IPO and its date. Thus, we would like to have you informed that we plan the pre-IPO exclusively for our VIP package holders approximately 2 months to go before the IPO. You will be notified accordingly in advance.

87. On or about October 16, 2020, the RoFx Operators directed The Investing Online to author, publish, and distribute a press release regarding the RoFx initial public offering. The press release disclosed that Berkshire Hathaway was currently negotiating for a majority position in RoFx:

RoFx's IPO is one of the most anticipated events in the financial market for many reasons. After ten years of successful journey, and immense popularity, most of the experts believe that this IPO is going to be a grand success. But there is one reason why there is so much talk about this IPO in financial forums, and that is Buffet's interest. There are talks among market experts that RoFx is going IPO as they have become an interest of Berkshire Hathaway, Warren Buffett's company, that currently negotiates for buying of RoFx majority stock holding. According to the terms of the agreement, Berkshire Hathaway should invest \$500 million in AI development that will significantly improve RoFx trading results. This not only increases the interest among the investors but also proves the credibility of the RoFx company.

88. The RoFx IPO press release was widely re-published or cited by major news outlets, including AP News and Yahoo. *See* Ex. 3.


89. On October 16, 2020, the RoFx Operators sent another email to all RoFx customers, stating:

This week many mass media announced that Berkshire Hathaway that belongs to Warren Buffet is intended to buy majority stock holding of RoFx which is going IPO. We would like to inform that this is a premature announcement. We will keep you updated.

90. Around this same time, the RoFx Operators used Warren Buffet's image on their Facebook page to reinforce Mr. Buffet's purported involvement with the RoFx Scheme.



91. In early 2021, the RoFx Operators informed all RoFx customers via email and website representations that they would also launch an initial coin offering (“ICO”). *See* Ex. 5, RoFx ICO Emails, at 2–3. Customers would have the opportunity to purchase “BRKROFX” digital tokens, a name implying the involvement of Berkshire Hathaway. BRKROFX tokens would represent value in the newly-developed “V2.0” RoFx platform which would provide “daily trading performance” of “.97%”. The RoFx Operators included a link in the email to a BRKROFX ICO white paper, which the RoFx Operators hosted on RoFx.net:



# BRKROFX


## ICODetails

- Pre-Sale Date: **March 1 - April 30, 2021.**
- ICO Date: **June 1st, 2021.**
- 1 token = 1 US Dollar.
- BRKROFX Tokens total supply: 1,000,000,000.
  - Pre-sale: 200,000,000 tokens.
  - Public sale: 100,000,000 tokens.
- Simple access via Myetherwallet, MyCrypto and other Ethereum web & mobile wallets.
- Simple tracking and monitoring starting from Pre-Sale & Public Sale event on Etherscan and other resources.
- Starting from June 1st, 2021 available on the following exchanges: Coinbase, Binance, Kraken, Bitfinex, Bithumb, Bitstamp and others.
- Token packages subscription is available starting from March 1st, 2021  
<https://rofx.net/brkrofx>

### ICOMission

- Raised funds are specifically intended for a new edge AI-based trading platform V2.0 development in order to increase trading robot profitability and ensure it's transparency and efficiency.
- Estimated average daily trading performance of the new platform V2.0 is 0.97%.  
Release is scheduled on March 31st, 2021.  
New AI platform V2.0 will be available for BRKROFX token packages only.
- Revenue generated by the company is distributed proportionally between all token holders on the annual basis.

### Tokens Allocation Model



Customer Package Type	Pre-Sale Discount
Trial	1%
Easy start	2%
Moneymaker	3%
Gold	4%
VIP 100,000 - 1,000,000	5%
VIP 1,000,000 - 2,000,000	6%
VIP 2,000,000 - 3,000,000	7%
VIP 3,000,000 - 5,000,000	8%
VIP more than 5,000,000	9%

### BRKROFX Token Pre-sale Discounts

Figure 2: BRKROFX White Paper Posted on RoFx.net

92. The BRKROFX white paper encouraged customers to create and maintain a large account balance in order to qualify for progressively more rewarding discounts during the ICO pre-sale, scheduled for March 1 to April 30, 2021.

93. On February 25, 2021, in preparation for the ICO pre-sale, the RoFx Operators created the BRKROFX tokens via a smart contract hosted on the Ethereum blockchain. On that same day, they distributed the BRKROFX tokens consistent with the “Tokens Allocation Model” provided in the BRKROFX white paper:

Latest Outbound Transfers			
Timestamp	Block	Amount	Currency
2021-02-25 21:21:34	<a href="#">11928753</a>	300.00M	BRKROFX
2021-02-25 21:04:14	<a href="#">11928655</a>	10.00M	BRKROFX
2021-02-25 21:02:52	<a href="#">11928647</a>	10.00M	BRKROFX
2021-02-25 21:00:51	<a href="#">11928640</a>	10.00M	BRKROFX
2021-02-25 20:59:32	<a href="#">11928637</a>	10.00M	BRKROFX
2021-02-25 20:58:56	<a href="#">11928635</a>	10.00M	BRKROFX
2021-02-25 20:58:56	<a href="#">11928635</a>	10.00M	BRKROFX
2021-02-25 20:58:56	<a href="#">11928635</a>	10.00M	BRKROFX
2021-02-25 20:54:17	<a href="#">11928615</a>	20.00M	BRKROFX
2021-02-25 20:52:21	<a href="#">11928606</a>	50.00M	BRKROFX
2021-02-25 20:50:43	<a href="#">11928597</a>	50.00M	BRKROFX
2021-02-25 20:45:44	<a href="#">11928574</a>	510.00M	BRKROFX

30% of total supply  
Via Primary Distribution Address  
[0xe8b4656a1907d9d3ffc7881138a819b915f82fe7](#)

70% of token supply for the “main investor” and “team & management”; these tokens have not moved since initial distribution.

94. On March 1, 2021, the RoFx Operators announced the launch of the ICO pre-sale via RoFx.net and emails to RoFx customers, again linking to the BRKROFX white paper:

Going public is a monumental event for any company. We have been heading towards this outstanding occasion for 12 years. It has been 12 years of efficient work, high achievements and absolutely unique challenges.

We have been one of the pioneers who implemented AI to Forex trading and the first who demonstrated such level of stable profitability for many years. The next important milestone is going public and successful completion of a V2.0 trading platform development, trading performance of which is much higher. We have been working on a new AI platform V2.0 since 2017 and now we are proud to release it on March 31st, 2021.

ICO Pre-sale dates: March 1 - March 31 , 2021 (for RoFx Customers ONLY).

95. In the BRKROFX white paper, the RoFx Operators listed the BRKROFX token price as \$1 USD per token. *See* Ex. 5 at 2; *supra* fig.2.

96. The RoFx Operators offered, via emails, existing RoFx customers the opportunity to purchase BRKROFX using funds from their RoFx account—contingent on the RoFx customer agreeing to commit those funds for up to 120 days, preventing withdrawals.

97. By the end of the ICO pre-sale on March 31, 2021, the entire pre-sale token allocation—200 million BRKROFX tokens—had been distributed.

98. On March 31, 2021, the RoFx Operators reacted to the purported demand for BRKROFX tokens by sending an email to all RoFx customers adjusting the pre-sale—making the “public sale” tokens available to RoFx customers during an extended pre-sale period:

We are thrilled to announce that during token Pre-sale, its demand has significantly outreached supply. We have received many requests from our Customers expressing regrets they did not succeed to buy BRKROFX till the pre-sale end.

Our Customers have always been our top priority, thus RoFx Management decided to extend the pre-sale till April 30, 2021 and allocate 100 000 000 tokens from the Public sale to Pre-sale.

99. On April 1, 2021, to encourage continued purchases of the BRKROFX tokens, the RoFx Operators sent an email to RoFx customers with the subject “RoFx launches the AI platform V2.0”, including a link to the “Upgraded AI V2.0” profit calculator:

We are happy to announce that RoFx launches the AI platform V2.0 today. We have been working on this new platform since 2017 and now we are proud to release it.

All token packages have been switched to new AI V 2.0 platform.



100. On June 1, 2021—the date of the purported BRKROFX ICO—the RoFx Operators sent an email to customers rescheduling the ICO date “due to delay in compliance procedure conducted by the financial authorities[.]”

101. Subsequently, the RoFx Operators sent an email claiming the previously disclosed IPO would be delayed until the third quarter of 2021. *See* Ex. 5 at 3.

### **B. The RoFx Reality**

102. Nearly every one of the representations made by the RoFx Operators listed in Section III.A, *supra*, is false, made to lure customers and keep them hooked on incredible and entirely illusory paper profits.

103. RoFx does not exist as a legal entity in any jurisdiction, is not a registered business name for any entity or person, and is not a registered trademark or copyright.

104. The RoFx Operators never developed a software algorithm for automated foreign exchange trading.

105. The RoFx Operators did not have offices at any of the three addresses listed on RoFx.net for Miami, London, or Hong Kong.

106. All representations regarding the safety of customer funds were false. There was no reserve fund covering customers’ losses. All explicit and implicit representations that any aspect of the RoFx Scheme was regulated or conducted via regulated entities was false and intended to induce new and continued contributions to the Scheme.

107. The RoFx Operators never engaged in foreign exchange trading on behalf of customers. The trading activity posted by Promoter Defendant Ester Holdings on MyFxBook.com was fictitious, intended to give the false impression that the RoFx Operators were actually conducting foreign exchange trades via third-party brokers.

108. Because no foreign exchange trading was done using RoFx customer funds, all claims of RoFx foreign exchange trading profitability were complete fabrications. Instead, the RoFx Operators simply pooled customers' monies, only allowing customers to redeem small amounts from their accounts to garner further trust. The remainder of the funds was used to pay others for their roles in the Scheme or taken as illicit gains by the RoFx Operators themselves. Thus, any account balances reported by the RoFx Operators to customers were illusory, existing only on paper.

109. Because RoFx customer account balances were illusory, the referral fees "paid" to existing customers for bringing in new customers were fictions serving no other purpose but to lure more unsuspecting customers into the Scheme.

110. RoFx customers were not free to withdraw their funds at any time, regardless of account package or tier. Only small withdrawals were occasionally permitted to further the illusion of the RoFx Scheme's legitimacy. But the RoFx Operators prevented large withdrawals by creating an endless parade of obstacles, such as never-ending requests for verification and Know-Your-Customer ("KYC") documents or by falsely claiming that regulatory or anti-money laundering ("AML") requirements were preventing large withdrawals.

111. All representations regarding RoFx account tiers, different trading algorithms, lock and no-lock packages, special VIP Conferences, and ICO pre-sale discounts were false and intended solely to keep customers' funds enmeshed in the Scheme.

112. The RoFx Operators exaggerated the popularity and widespread adoption of the RoFx trading robot to encourage continued contributions. In reality, there were far fewer than the 30,000 to 70,000 claimed customers. The actual number of customers was between 1,000 and 2,000.

113. There was never a planned RoFx IPO.

114. Warren Buffet and Berkshire Hathaway were not interested in ownership of the RoFx Scheme. The RoFx Operators made these misrepresentations to encourage further contributions by customers. *See* Ex. 3.

115. There was never going to be a BRKROFX ICO—only the token pre-sale, which was exclusively directed to existing RoFx customers.

116. Although the RoFx Operators did create and distribute BRKROFX tokens, these tokens were never going to serve any purpose, contrary to the RoFx Operators' claims. The BRKROFX tokens are worthless.

117. The RoFx Operators created the illusion of an active BRKROFX ICO pre-sale by distributing tens of millions of BRKROFX tokens to addresses which were actually under the control of the RoFx Operators. Examining the Ethereum blockchain reveals substantial BRKROFX trading activity, but this activity is artificial, intended only to create excitement among customers and encourage further contributions to the RoFx Scheme. The RoFx Operators reinforced this illusion by sending emails to customers regarding fictitious popular demand for the BRKROFX tokens. *See* Ex. 5 at 4.

118. The opportunity to purchase BRKROFX tokens using funds in an existing RoFx customer account—in exchange for locking in those funds—was only intended to discourage RoFx customers from withdrawing their assets.

119. Both the purported IPO and BRKROFX ICO were illusory mechanisms purely intended to attract additional contributions from customers.

120. The RoFx Operators' claims of a 12-year long RoFx Scheme are false.

121. Instead, the RoFx Scheme began on or about October 1, 2016, when the RoFx Operators registered, or directed the registration of, the RoFx.net domain using the stolen identity of a Belizean citizen. On September 9, 2017, the RoFx Operators renewed the RoFx.net domain through domain services provider Network Solutions, LLC, based in Jacksonville, Florida. The RoFx Operators renewed the RoFx.net domain again on June 19, 2018.

122. The RoFx.net domain remained unused until approximately January 2018. It was then that the RoFx Operators published the RoFx.net website and distributed false press releases as paid sponsored content via Promoter Defendant The Investing Online on numerous third-party websites. *See* Ex. 3.

123. RoFx.net, hosted via Network Solutions in Florida, was the source from which most of the RoFx Scheme's misrepresentations oozed, including the RoFx.net website, numerous RoFx.net customer interactions, and plentiful RoFx.net emails.

124. From about June 2018 to July 2021, the RoFx Operators began posting false trades via Promoter Defendant Ester Holdings. Again, no trades were ever conducted.

125. From about June 2018 to September 2021, the RoFx Operators published false reviews on Trustpilot using fabricated "customers" to provide rave reviews for the illusory Scheme. *See* Ex. 4.

126. Between January 2018 and September 2021, relying on the web of deception spun by the RoFx Operators, over 1,000 RoFx customers contributed approximately 75 million USD to the RoFx Scheme, including amounts invested when purchasing BRKROFX tokens. *See* Exs. 1–6.<sup>9</sup>

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<sup>9</sup> Plaintiffs' counsel solicited information from potential class members regarding their contributions to the RoFx Scheme. Ex. 6, Claimant Transactions, lists transactions from RoFx

127. On or about September 17, 2021, the RoFx Operators shut down RoFx.net and stopped responding to customers.

### **C. The Money Laundering Enterprise**

128. The RoFx Operators utilized the illusory promise of a safe, highly lucrative, foreign exchange trading platform to lure contributions from Plaintiffs. With the assistance and participation of numerous Defendants, the RoFx Operators obscured their financial trail by laundering money across the globe through a variety of **Company Organizers, Front Companies, Layering Companies, and Cash-Out Companies**.

129. Each of these Defendant Groups played a pivotal role in the Money Laundering Enterprise, whose goal was to obscure, hide, and clean the funds from the RoFx Scheme on behalf of the RoFx Operators. The roles are defined as follows:

- a. Company Organizers: individuals and entities creating, acquiring, and transferring Front Companies. Company Organizers also directed the dissolution of Front Companies to further obscure the evidentiary trail linking illicit funds to Defendants.
- b. Front Companies: clean companies—companies not subject to any particular scrutiny—able to satisfy KYC and AML requirements and establish bank accounts. Front Companies and their principals established or used existing bank accounts primarily to receive RoFx customer funds, introducing the illicit funds into the financial system for onward movement through the RoFx money laundering network. Front Companies were generally only actively involved in the scheme for a finite period of time. Certain of the Front Companies—Trans-Konsalt, Aware Choice, and VDD—assumed hybrid roles, both receiving customer funds and acting as a conduit for sending limited RoFx customer “withdrawals” back to customers in furtherance of the Scheme, *see supra* ¶ 110, and to conceal the existence of the Money Laundering Enterprise.
- c. Layering Companies: existing companies with a high volume of financial transactions, selected to obfuscate the flow of illicit funds. Layering Companies received transactions from *both* RoFx customers and Front Companies and then, as directed by the RoFx Operators, sent the illicit funds onward to Cash-

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customers to different RoFx affiliates. This is just a subset of the thousands of transactions submitted by the 750 potential class members. Review of this information is ongoing and the number of potential class members is expected to increase.

Out Companies, other Layering Companies, or returned dribbles of payments back to RoFx customers as “withdrawals” in furtherance of the Scheme and to conceal the existence of the Money Laundering Enterprise.

- d. Cash-Out Companies:<sup>10</sup> the exit point for the illicitly obtained funds. Cash-Out Companies established accounts around the world and received funds from Front and Layering Companies. Money mules withdrew and couriered cash from Cash-Out Companies to the RoFx Operators.

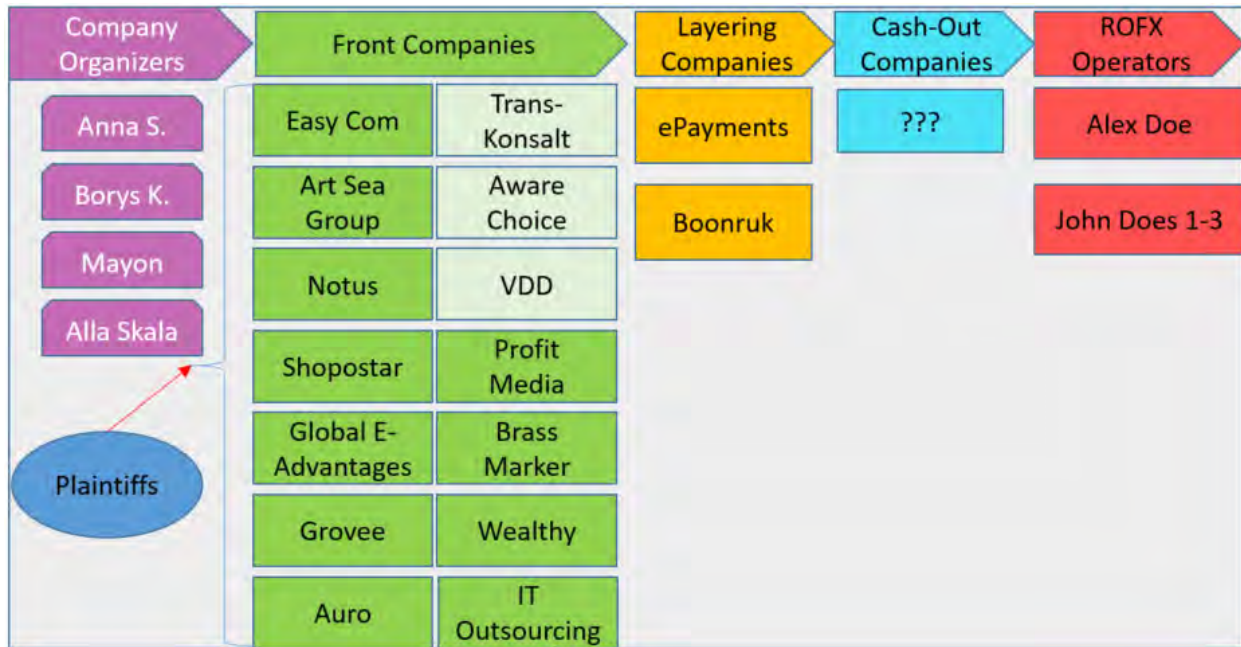


Figure 3: The Money Laundering Enterprise

130. This complex money laundering scheme was necessary to avoid scrutiny of the illicit transactions. As the scheme snowballed, the RoFx Operators created additional Front Companies to further distribute the transaction volume and dampen suspicion.

131. The RoFx Operators directed customers to send funds to accounts held by the various Front Companies. When customers inquired as to why the Front Companies were not named “RoFx” or similar, the RoFx Operators explained the different entities were used for regulatory reasons. This was false.

<sup>10</sup> Plaintiffs are still analyzing available information to determine the identities of the RoFx Cash-Out Companies.

***Initial Flow of Funds Through the United Kingdom and the Czech Republic***

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***Wealthy Developments, Anton Bilous, and ePayments***

132. Sometime prior to January 15, 2018, the RoFx Operators established Front Company **Wealthy Developments** via **Anton Bilous**. Bilous created a bank account and deposited funds—funds provided by the RoFx Operators.

133. At this time, in January 2018, Defendant **ePayments Systems Ltd** was an Authorized Electronic Money Institution regulated by the United Kingdom’s Financial Conduct Authority. ePayments offered prepaid Mastercards, “safe and instant transfers”, and emphasized its cross-border and global transaction capabilities. Banners on the ePayments site touted its services to businesses:

- a. “PAY CLIENTS AND PARTNERS AROUND THE WORLD”
- b. “MAKE TRANSFERS TO ALTERNATIVE PAYMENT SYSTEMS”

134. The RoFx Operators needed both a Front Company capable of receiving funds and a Layering Company with existing financial transactions which would offer cover for the international and illicit transactions the RoFx Operators needed to disguise. ePayments ticked all the right boxes.

135. On or around January 15, 2018, the RoFx Operators, directly or via Bilous, established a relationship with ePayments: ePayments would receive funds from RoFx customers and route the illicit funds as directed by the RoFx Operators—with little or no scrutiny. In return, ePayments would receive an “affiliate fee.”

136. On January 29, 2018, Bilous, through Wealthy Developments, sent \$15,350 to ePayments. This was, apparently, the first of several “affiliate fee” payments. *See* Ex. 9, Transfers to Layering Companies, at 2.<sup>11</sup>

137. On that same day, January 29, 2018, the RoFx Operators directed one of the earliest RoFx customers to contribute his funds to the RoFx Scheme by depositing €4,999 with ePayments.<sup>12</sup> The RoFx customer did so. *See* Ex. 6, Claimant Transfers, at 1.

138. The RoFx Operators continued to use ePayments’ services as conduit to their Scheme through at least September 5, 2018—directing RoFx customer funds directly to ePayments. *See id.* Around this time ePayments apparently ceased *directly* receiving RoFx customer funds.

139. However, in addition to serving as a conduit between customer funds and the RoFx platform, ePayments acted as a Layering Company in the Money Laundering Enterprise: accepting funds from various RoFx Front Companies and transacting those assets as directed by the RoFx Operators. *See* Ex. 9 at 1. ePayments continued in this role until at least July 2019.

140. However, in April 2018, the RoFx Operators, concerned about the increasing number of transactions through ePayments, began directing some customers to send funds to Wealthy Developments. Bilous, using Wealthy Developments’ bank account, sent the funds onward as directed by the RoFx Operators. Bilous continued to use Wealthy Developments and its bank account as a Front Company for the RoFx Operators through September 2018. *See* Ex. 6 at 1.

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<sup>11</sup> Exhibit 9 is a mere window into the universe of financial transactions involving Layering Companies. The exhibit is limited to information produced by nonparties; further discovery will expand our understanding of the RoFx financial web.

<sup>12</sup> ePayments and Boonruk Ruamkit were not exclusively used as intermediary Layering Companies and were, on occasion, direct recipients of RoFx customer funds.



**Aware Choice, Dmytro Fokin, and Ivan Hrechaniuk**

141. Sometime prior to June 12, 2018, the RoFx Operators became increasingly worried about the RoFx customer transaction volume, despite that volume already being distributed between ePayments and Wealthy Developments.

142. To address this concern, the RoFx Operators activated another Front Company: **Aware Choice**. Aware Choice's directors **Dmytro Fokin** and **Ivan Hrechaniuk** created a bank account to use for RoFx transactions.

143. Between June 2018 and June 2019, the RoFx Operators directed some customers to send monies to Aware Choice. *See id.* at 1-5. Fokin and Hrechaniuk, using Aware Choice's bank account, sent the funds onward as directed by the RoFx Operators.

144. The RoFx Operators then directed Fokin and Hrechaniuk to begin using Aware Choice and its bank account for a different purpose: specifically, between September 2019 and January 2020, the RoFx Operators collected substantial funds (\$1.9 million or more) from their United States Front Companies and sent those monies to Aware Choice. *See Ex. 7, Transfers Between Defendants*, at 2. Fokin and Hrechaniuk then sent those funds onward as directed by the RoFx Operators. During this time, upon information and belief, Aware Choice was used as a Cash-Out Company for the benefit of the RoFx Operators, with money mules carrying cash to the RoFx Operators.

145. After Aware Choice had served its purpose, the RoFx Operators directed Fokin and Hrechaniuk to dissolve Aware Choice to conceal their wrongdoing. And Fokin and Hrechaniuk did so on March 23, 2021.

**Brass Marker and Sergiy Prokopenko**

146. By October 2018, the RoFx Operators were attracting more and larger investments. At this point in the scheme, the RoFx Operators were exclusively using the SWIFT<sup>13</sup> network for interbank transactions. Apparently believing they could remain under the regulatory radar by distributing transactions onto another financial network, and wanting to distribute transactions through another part of Europe, the RoFx Operators activated Front Company **Brass Marker**.

147. Brass Marker, based in the Czech Republic, could establish a bank account taking advantage of the Eurozone's SEPA<sup>14</sup> financial network. Brass Marker did so, via its officer **Sergiy Prokopenko**, and at the direction of the RoFx Operators.

148. Between November 2018 and January 2019, the RoFx Operators directed some customers to send contributions to Brass Marker. *See* Ex. 6 at 2. Sergiy, using Brass Marker's bank account, sent the funds onward as directed by the RoFx Operators.

**Profit Media Group**

149. The RoFx Operators activated yet another United Kingdom Front Company to handle the transaction load: **Profit Media Group**. Profit Media created a bank account to use for RoFx transactions.

150. Between January and July 2019, the RoFx Operators directed some customers to send funds to Profit Media. *See id.* at 2–3. Profit Media, using its bank account, sent the funds onward as directed by the RoFx Operators.

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<sup>13</sup> Society for Worldwide Interbank Financial Telecommunication.

<sup>14</sup> Single Euro Payments Area.

**VDD-Trading, Dmytro Fokin (again), and Manuchar Daraselia**

151. Also, in early 2019, the RoFx Operators activated Front Company **VDD-Trading**. VDD's directors **Dmytro Fokin**<sup>15</sup> and **Manuchar Daraselia** created a bank account to use for RoFx transactions.

152. Between February and November 2019, the RoFx Operators directed some customers to send funds to VDD. *See id.* at 3–4. Dmytro and Manuchar, using VDD's bank account, sent the funds onward as directed by the RoFx Operators.

153. Afterward, the RoFx Operators directed Dmytro and Manuchar to dissolve VDD to conceal their wrongdoing. Dmytro and Manuchar did so on October 13, 2020.

**Money Flow in the United States**

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154. In or around July 2019—approximately 18 months after the genesis of the RoFx Scheme—the RoFx Operators decided to create Front Companies in the United States. RoFx customers were increasingly reluctant to wire money overseas; providing the lucrative United States market with Front Companies and domestic bank accounts for receiving funds would encourage doubtful customers.

155. The RoFx Operators sought to acquire or control clean Front Companies with an existing history in the United States. Their first stop was **Auro Advantages, LLC**.

**Auro Advantages, LLC**

156. On May 16, 2019, the RoFx Operators acquired—directly, or via an agent—the entity Auro Advantages, purchasing the entity from an unidentified Ukrainian. The purchase included at least one existing United States bank account under a business name previously used by the newly-purchased entity: Paydo Financial Services, LLC.

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<sup>15</sup> Dmytro is also associated with Front Company Aware Choice. *See supra* ¶ 142.

157. Between June 2019 and September 2021, the RoFx Operators instructed customers to send funds to Auro Advantages. RoFx customers sent Auro at least \$436,000. *See id.* at 3–4, 19.

158. The RoFx Operators, acting through Auro Advantages, then sent funds onward to other RoFx-affiliated companies to obscure the illicit asset trail, including at least one payment of €3,000 on July 15, 2019 to Layering Company ePayments. *See Ex. 9* at 2.

159. Auro Advantages had a prior existing relationship with nonparty James Palasota, who is in the business of assisting persons in establishing companies in the United States.

160. The RoFx Operators sought to exploit the relationship with Mr. Palasota to create additional Front Companies in the United States. The RoFx Operators, or their agent, told Mr. Palasota they were in the business of “chartering expensive yachts.” Mr. Palasota was suspicious and refused to provide services to the RoFx Operators.

**Company Organizers Borys Konovalenko and Mayon Solutions**

161. Denied by Mr. Palasota, the RoFx Operators contacted a Ukrainian law firm for assistance in setting up Front Companies in the United States. The law firm directed the RoFx Operators to **Borys Konovalenko** and the Mayon Solutions group of companies: **Mayon Solutions, LLC; Mayon Solutions Ltd; and Mayon Holding Ltd** (collectively, “Mayon”)<sup>16</sup>.

162. Konovalenko, both individually and through Mayon, is in the business of forming companies for others and providing “post-incorporation” “resident director services”, among other services. Konovalenko played a pivotal role in either forming or directing the formation of Front

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<sup>16</sup> For the purposes of this section, the Mayon entities will individually be referred to as: (1) Mayon Solutions, LLC (“Mayon USA”), (2) Mayon Solutions Ltd (“Mayon UK”); and Mayon Holding Ltd (“Mayon HK”).

Company Defendants Notus, Shopostar, Easy Com, and Global E-Advantages—all based in the United States.

163. **Alex Doe**, one of the RoFx Operators, met Konovalenko sometime in late July or early August 2019. During the meeting, Alex informed Konovalenko that he wanted Mayon to form or acquire companies in the United States for certain projects.

164. Before entering into a service agreement with Mayon, Konovalenko requested certain KYC and AML documents from Alex. In response, Alex described his project as providing online marketing and video production services relating to two websites: trainingacademy.network (now defunct) and corvid productions.<sup>17</sup>

165. On August 19, 2019, **Mayon UK** entered into the service agreement with Alex (the “RoFx Services Agreement”), who appointed Company Organizer Defendant **Vsevolod Tovstun** to act as Alex’s representative in signing the Agreement. Under the Agreement, Mayon and Konovalenko would acquire and service Front Companies for the RoFx Operators.

166. Tovstun, acting as Alex’s agent, and **Olga Tielly**, Director of Mayon UK, executed the RoFx Services Agreement in London.

167. Pursuant to the RoFx Services Agreement, **Tovstun, Konovalenko, Tielly**, and **Mayon** were RoFx Company Organizers laying the foundations for most of the Money Laundering Enterprise based in the United States.

168. Pursuant to the RoFx Services Agreement, Mayon sent invoices to the RoFx Operators for Mayon’s services. At the insistence of the RoFx Operators, they paid Konovalenko

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<sup>17</sup>The domain for <https://corvid.productions/> is registered to Front Company Defendant Notus. It now inexplicably displays a website for Paesano’s Café, a “casual fine dining restaurant” with three Texas locations.

personally for some services rendered; the RoFx Operators directed the remainder of the payments to **Mayon USA**.<sup>18</sup>

169. Konovalenko maintained communication with Alex through Telegram messenger and email. Sometime between September and October 2019, Konovalenko noticed that Alex deleted his Telegram account and, with it, their communication history.

170. Between most of August 2019 and September 2021—the time period relevant to Mayon’s involvement in the Money Laundering Enterprise—Konovalenko utilized the various Mayon entities to distance himself from the tortious conduct. Specifically, Konovalenko utilized this complex company framework to facilitate the formation or acquisition of several Front Companies for the RoFx Operators and conceal his involvement in doing so. Several of the Mayon agents or employees contributed to this aspect of the Money Laundering Enterprise:

a. Marina Garda

- i. From April 2019 to October 15, 2019, **Marina Garda** was the sole member of Mayon USA and authorized signatory for the company. *See* Figure 6.
- ii. During the same period, Garda was the sole shareholder of Mayon HK—and Mayon HK delegated signature authority to Garda. *See* Figure 5.
- iii. Garda used her authority over Mayon UK and Mayon USA to direct Mayon agents and employees at the behest of the RoFx Operators and Konovalenko—the real authority behind Mayon HK. In this capacity, Garda helped acquire and service Front Companies for the RoFx Money Laundering Enterprise, understanding their true purpose.
- iv. After eight months of playing her part in the RoFx Money Laundering Enterprise, Garda abruptly sold her interests in Mayon USA and Mayon HK on October 15, 2019 and July 16, 2020, respectively. *See id.*; Figure 6. Garda sold her interest in Mayon USA to Mayon HK; and sold her interest in Mayon HK to Konovalenko. *See id.*

b. Daria Eckert

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<sup>18</sup> This was contrary to the terms of the RoFx Services Agreement, which was executed by Mayon UK—not Mayon USA.

- i. On October 10, 2019—weeks after executing the RoFx Services Agreement—Maria Garda, acting as Mayon HK’s agent, appointed **Daria Eckert** as manager of Mayon USA. *See* Figure 6.
  - ii. In this capacity, Eckert helped acquire and service Front Companies for the RoFx Money Laundering Enterprise, understanding their true purpose.
  - iii. She remained manager of Mayon USA until September 22, 2020, at which point Konovalenko became manager of Mayon USA. *See id.*
- c. Olga Tielly
  - i. On March 9, 2018, **Olga Tielly** became sole owner and director of Mayon UK. *See* Figure 4.
  - ii. On behalf of Mayon UK, Tielly executed the RoFx Services Agreement with Alex Doe and Vsevolod Tovstun.
  - iii. Tielly had an ownership interest in Mayon UK until April 19, 2019, at which point she transferred that interest to Mayon HK—retaining the title of Director. *See* Figure 4.
- d. Mayon HK
  - i. Mayon HK was formed on April 17, 2019. Marina Garda initially owned 70% of the company; Borys Konovalenko purchased her interest in July of 2020. *See* Figure 5.
  - ii. From April 2019 to present, Mayon HK has been the sole owner of Mayon UK. Figure 4.
  - iii. Similarly, since October of 2019, Mayon HK has been the sole member of Mayon USA. *See* Figure 6.
  - iv. The RoFx Services Agreement was executed and performed during this period, beginning on August 19, 2019. *See id.*
- e. Borys Konovalenko
  - i. Konovalenko is the connective tissue between all Mayon persons and entities.
  - ii. Konovalenko was either an owner, member, director, or manager of each of the Mayon entities at some point between August 2019 to present. *See* Figure 4–Figure 6.

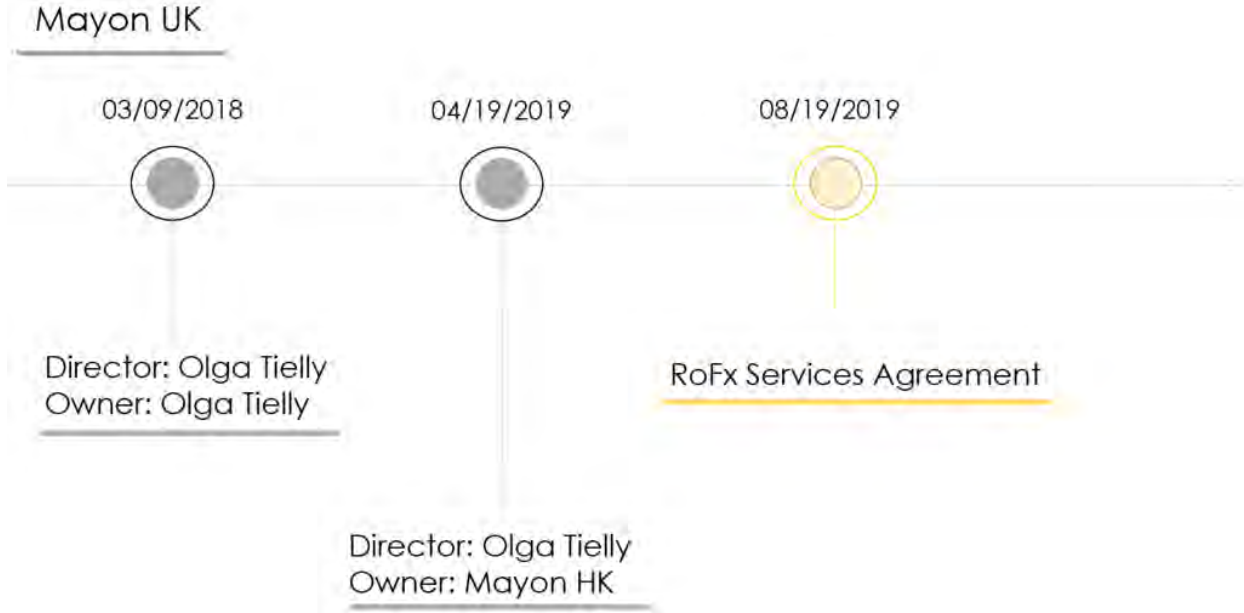


Figure 4: Mayon UK Timeline

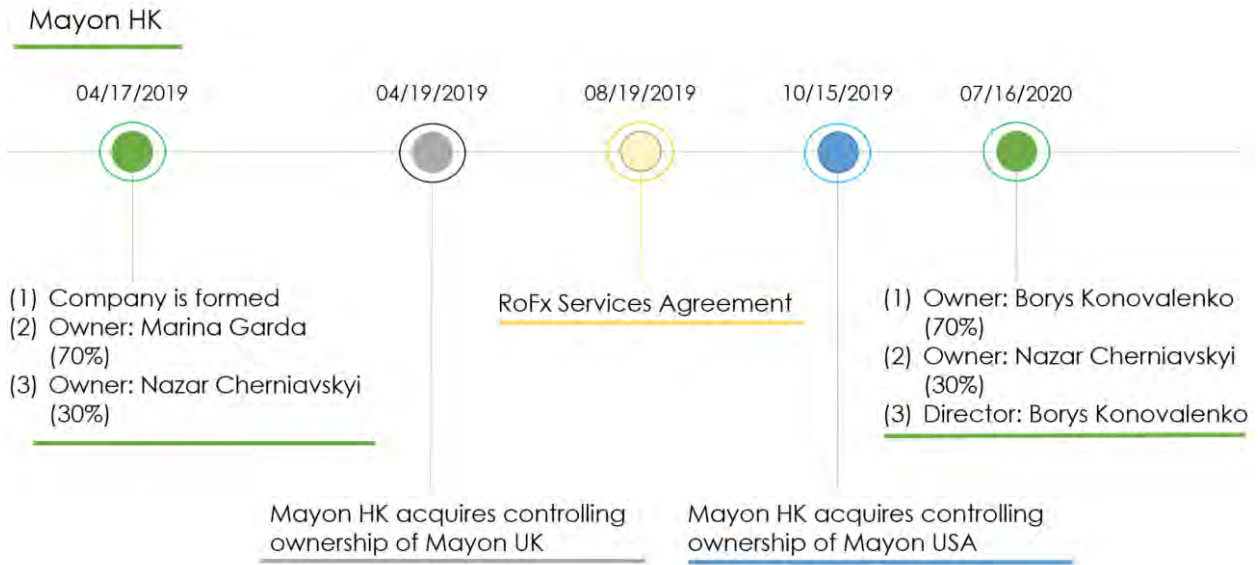


Figure 5: Mayon HK Timeline



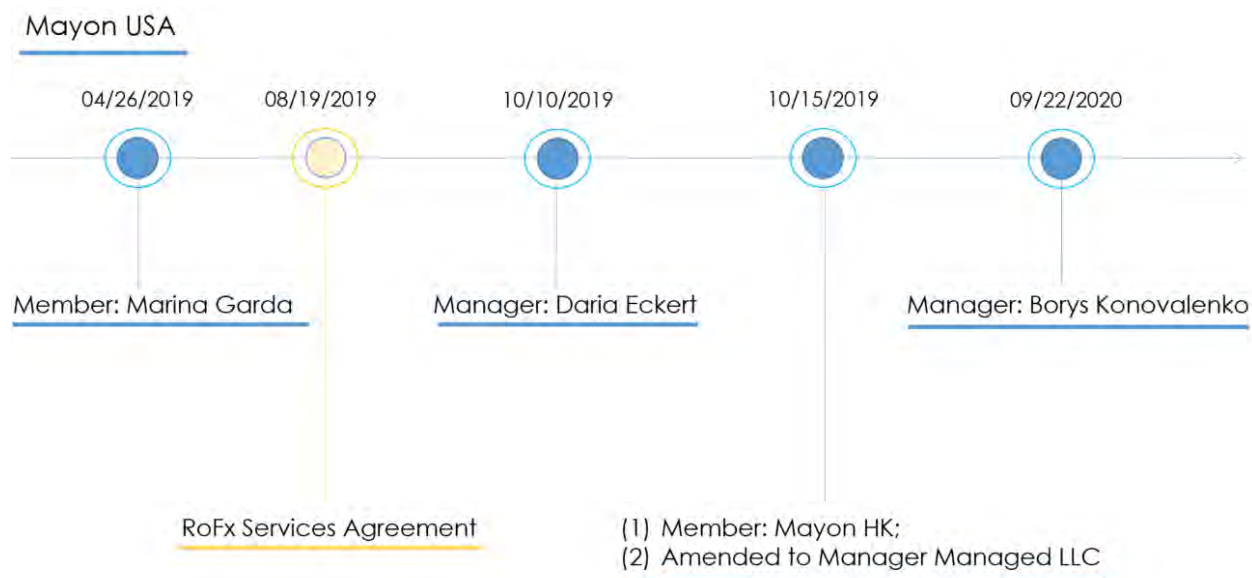


Figure 6: Mayon USA Timeline

### Notus and Alla Skala

171. Facilitated by Konovalenko and Mayon and its agents, on August 19, 2019,<sup>19</sup> **Alla Skala**—acting as agent of either Mayon, Konovalenko, or the RoFx Operators—acquired all shares in Front Company **Notus** from another Ukrainian citizen.

172. Skala then established, or took control of, bank accounts for Notus and used them as directed by the RoFx Operators. Notus and Skala fulfilled several roles for the RoFx Operators:

- a. As a Front Company, between about October 2019 and July 2021, the RoFx Operators instructed customers to send funds to Notus—customers sent well over \$2.7 million during this period, *see* Ex. 6, at 4–8, 10, 18;
- b. Between at least May 2020 and October 2020, other U.S. Front Companies sent large amounts—at least \$1.8 million—to Notus for onward integration into the RoFx money laundering network, *see* Ex. 8, Transfers from Front Companies to Notus, at 2;
- c. To facilitate the use of funds abroad, between September 2019 and October 2020, the RoFx Operators directed Skala to send over \$5.3 million of collected customer funds to U.K. Front Company **Aware Choice**, Bulgarian Front

<sup>19</sup> This is the same day Mayon UK and Tovstun executed the RoFx Services Agreement.

Company **Trans-Konsalt**, and Thai Layering Company **Boonruk Ruamkit**, see Ex. 7, at 2–4;

- d. Finally, Notus, using RoFx customer funds, was used as a channel to funnel hundreds of thousands of dollars to Konovalenko, Mayon, Mayon’s agents and principals, and Skala for their roles in the Scheme.

**Shopostar and Nataliya Los**

173. Prior to January 2020, Mayon and Konovalenko arranged for the RoFx Operators to have operational control over Front Company **Shopostar** and its banking accounts via its owner, **Nataliya Los**.

174. Between January 2020 and September 2021, the RoFx Operators directed customers to send over \$3.2 million to Shopostar. Ex. 6 at 5, 9–11, 13–14, 16–19.

175. Shopostar, via Nataliya, sent these funds, as directed by the RoFx Operators, to Thai Layering Company **Boonruk Ruamkit**, between approximately October 2020 and September 2021.

**Global E-Advantages, Alla Skala (again), and Olga Arbykosova**

176. In February 2020, payment processor Transferwise informed **Skala** that her Notus account was frozen pending an AML investigation. This caused the RoFx Operators, Konovalenko, and Mayon concern; additional Front Companies were sought to distribute the transaction volume and reduce the risk of incurring further unwanted regulatory oversight. One of those companies was **Global E-Advantages**.

177. Prior to April 28, 2020, Mayon and Konovalenko facilitated Skala’s control over Front Company Global E-Advantages—specifically, over a bank account in that entity’s name. The RoFx Operators directed Skala to use her authority over the Global E-Advantages account to serve several purposes:

- a. As a Front Company, between about April 2020 and January 2021, the RoFx Operators instructed customers to send funds to Global E-Advantages—customers sent well over \$890,000 during this period; Ex. 6 at 6–10.
- b. The RoFx Operators used Global E-Advantages to send funds outside the United States; first, by sending RoFx funds to **Notus** between May 2020 and October 2020; then by sending funds to Thai Layering Company **Boonruk Ruamkit**; *Id.* at 6–8; Ex. 7 at 2–4.
- c. The RoFx Operators also used Global E-Advantages to pay Mayon Solutions \$862,000 between October 2020 and February 2021 for their part in the Money Laundering Enterprise. Ex. 7 at 4–5.

178. The RoFx Operators hired Mayon’s previous financial manager, **Olga Arbykosova**, as an operational and financial manager. Arbykosova, directed by the RoFx Operators and Skala, processed both **Notus’** and **Global E-Advantages’** transactions through online banking.

**Easy Com, Jase Victor Davis, and Company Organizer Anna Shmyko**

179. The RoFx Operators sought still further Front Companies. On September 22, 2020, Mayon or Konovalenko instructed Company Organizer **Anna Shymko** to register Front Company **Easy Com** for the purpose of satisfying the RoFx Operators’ needs.

180. On December 3, 2020, Mayon facilitated the transfer of Easy Com to **Jase Victor Davis**, who acted as agent for the RoFx Operators. Davis opened two bank accounts for Easy Com around January 2021 and was the sole signatory on these accounts. From that point forward, the RoFx Operators directed RoFx customers to deposit at least \$3.4 million into Easy Com’s accounts, which Davis sent onward as directed by the RoFx Operators. *See* Ex. 6 at 10–17.

181. By early 2021, either Konovalenko or the RoFx Operators decided to wind up Notus—perhaps owing to the earlier 2020 Transferwise AML investigation, which put the RoFx Operators on notice that their transactions were attracting scrutiny. Konovalenko facilitated the transfer of Notus from Skala to Shymko on April 14, 2021. Konovalenko then instructed Shymko

to dissolve Notus, which she did on September 16, 2021, a mere day before the RoFx.net website went permanently offline.

**Grovec, Timothy Stubbs, and Jared Goodyear**

182. The RoFx Operators made use of at least two other Front Companies in the United States: **Grovec, LLC** and a person named **Jared Goodyear**—both towards the end of the Money Laundering Enterprise.

183. Prior to November 18, 2020, **Timothy Stubbs** had business or personal relationships with **Notus, Shopostar, Borys Konovalenko, Nataliya Los, Anna Shymko, and Alla Skala**—all of whom are associated with Mayon’s activities in the United States. At the direction of Konovalenko and Mayon, Stubbs managed different United States shell companies used by Konovalenko and Mayon, creating bank accounts for those companies and receiving and forwarding mail for these companies from Stubbs’ personal residential addresses.

184. Stubbs took an active role in the RoFx Money Laundering Enterprise when, on November 18, 2020, Stubbs opened a bank account at Bank of America in the name of **Grovec**, designating himself as the sole account signatory. In the account opening documents, Stubbs identified himself as “Manager” of Grovec.

185. Several months later, a “Member” of Grovec opened a second account at Bank of America to accept RoFx customer funds and dilute transaction volume to evade regulatory scrutiny.

186. Between November 2020 and May 2021, the RoFx Operators directed customers to send at least \$250,000 to Grovec through two Bank of America accounts. Stubbs then directed the funds onward as instructed by the RoFx Operators. *See id.* at 10–14, 16.

187. In February 2021, the RoFx Operators instructed at least one customer to send funds to an account in the name of Jared Goodyear. *See id.* at 11. The person controlling the Jared Goodyear account then sent the funds onward, as instructed by the RoFx Operators.

**The RoFx Operators Get Spooked by Anti-Money Laundering Investigations**

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188. Two events occurred in February 2020, startling the RoFx Operators:

- a. The United Kingdom Financial Control Authority suspended **ePayments**, a company used by the RoFx Operators, following a review of ePayments's AML systems and controls; and
- b. Transferwise conducted an AML investigation of **Notus**.

189. In reaction to these events, the RoFx Operators began looking for financial avenues outside the United States and United Kingdom. They pursued opportunities in Bulgaria, Thailand, and South Korea.

**Bulgarian Front Company Trans-Konsalt MR**

190. On or about January 2020, the RoFx Operators acquired control over **Trans-Konsalt MR**, or its accounts, in Bulgaria.

191. Between January 2020 and March 2020, the RoFx Operators directed customers to send at least \$370,000 in funds to Trans-Konsalt. *See id.* at 5-6, 8.

192. In March 2020, the RoFx Operators also sent to Trans-Konsalt, from **Notus**, an additional \$279,780 in customer funds. *See Ex. 7* at 2.

193. The RoFx Operators then caused Trans-Konsalt to move all customer funds according to the RoFx Operators' needs.

**Thai Companies Boonruk Ruamkit and IT Outsourcing**

194. In mid-March 2020, the RoFx Operators, through at least two intermediaries, contacted Thai Layering Company **Boonruk Ruamkit** via managing director **Nattpemol**

**Krinara.** Boonruk Ruamkit had an existing IT support and computer graphics business, including numerous international financial transactions.

195. The RoFx Operators sought to use Boonruk as a Layering Company, using its legitimate business transactions to disguise illicit RoFx transactions. By April 2020, they had an agreement to do so: the RoFx Operators would send monies to Boonruk; Boonruk would direct the funds according to the RoFx Operators' instructions; and, in return, Boonruk could deduct 2% from all incoming funds as their service fee.

196. The RoFx Operators directed Layering Company Boonruk, via its director Nattpemol, to use Boonruk's account for several purposes:

- a. Between April 2020 and July 2021, the RoFx Operators instructed customers to send at least \$3.1 million directly to Boonruk, *see* Ex. 6 at 6–18;
- b. Between October 2020 and September 2021, the RoFx Operators moved at least \$5.1 million in customer funds from the United States to Boonruk, *see* Ex. 7 at 2–5; and
- c. The RoFx Operators instructed Boonruk to send some small amounts as “withdrawals” back to customers to maintain the illusion of a legitimate enterprise and encourage continued contributions.

197. By March 2021, the substantial transaction volume through Boonruk alarmed Krinara and the RoFx Operators. Krinara, in conjunction with shareholder Papahratsorn Raviratporn, incorporated Front Company IT Outsourcing.

198. Nattpemol caused IT Outsourcing to open its own bank account to help bear the transaction load from the RoFx customer transactions. The RoFx Operators used the IT Outsourcing account almost exclusively to receive RoFx customer transactions. Between April 2021 and September 2021, the RoFx Operators instructed customers to send over \$270,000 to IT Outsourcing. *See* Ex. 6 at 7, 15–19. Nattpemol then sent these funds onward as directed by the RoFx Operators.

**South Korean Front Company Art Sea Group**

199. On or about August 2020, the RoFx Operators acquired control over **Art Sea Group**, or its accounts, in South Korea.

200. Between August 2020 and December 2020, the RoFx Operators directed customers to send at least \$310,000 in funds to Art Sea Group. *See id.* at 8–10.

201. The RoFx Operators then caused Art Sea Group to move all customer funds according to the RoFx Operators’ needs. Specifically, the RoFx Operators returned small amounts to customers to satisfy requests for “withdrawals” in furtherance of the Scheme, or sent funds to Cash-Out Companies for money mules to withdraw and move as needed.

**Money Laundering Summary**

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202. The RoFx Operators established an international web of companies in an effort to conceal the illicit gains of the RoFx Scheme. The following chart, based on available data, shows the involvement of different Defendants in the Money Laundering Enterprise over time:

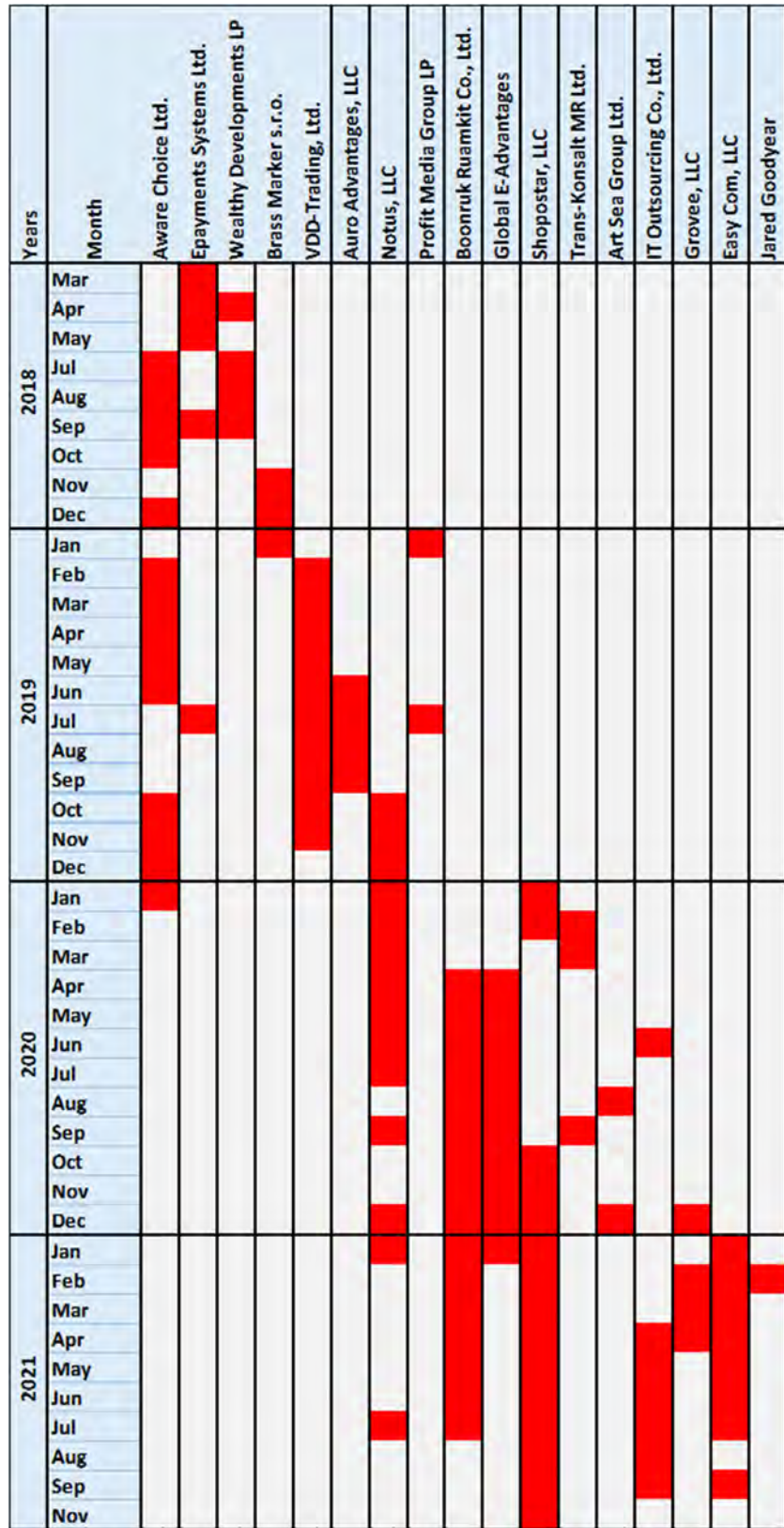


Figure 7: The Money Laundering Enterprise Over Time



**Front Companies**

203. In summary, with respect to Front Companies or Layering Companies directly receiving RoFx customer funds, existing data from Exhibit 6 shows:<sup>20</sup>

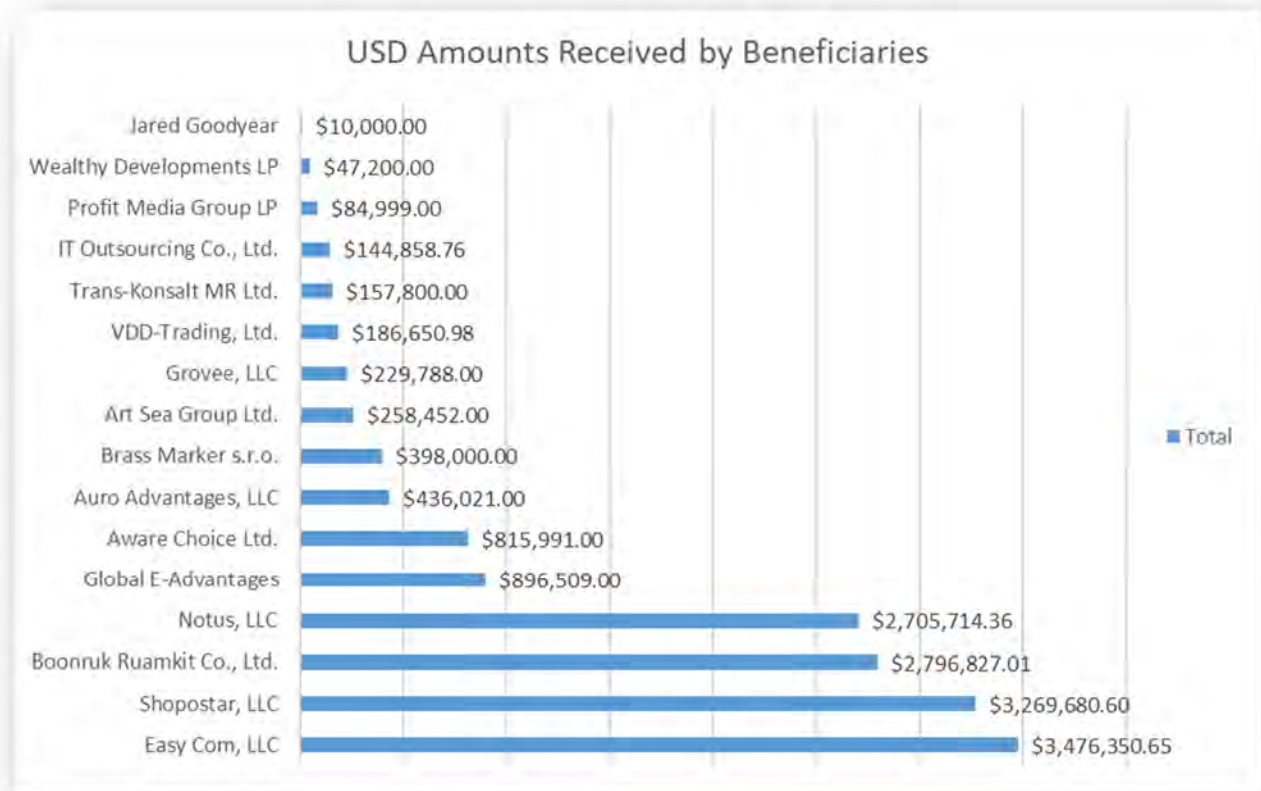
- a. Wealthy Developments received funds from RoFx customers totaling at least €29,600 and \$47,200 among 12 transactions.
- b. ePayments received funds from RoFx customers totaling at least €4,997 and \$7,500 among 11 transactions.
- c. Aware Choice received funds from RoFx customers totaling at least €43,600 and \$815,991 among 39 transactions.
- d. Brass Marker received funds from RoFx customers totaling at least €14,400 and \$398,000 among 11 transactions.
- e. Profit Media received funds from RoFx customers totaling at least €2,000 and \$84,999 among 3 transactions.
- f. VDD received funds from RoFx customers totaling at least €31,500 and \$186,650.98 among 33 transactions.
- g. Auro Advantages received funds from RoFx customers totaling at least \$436,021 among 18 transactions.
- h. Notus received funds from RoFx customers totaling at least \$2,705,714.36 among 117 transactions.
- i. Shopostar received funds from RoFx customers totaling at least \$3,269,680.60 among 112 transactions.
- j. Global E-Advantages received funds from RoFx customers totaling at least \$896,509 among 75 transactions.
- k. Easy Com received funds from RoFx customers totaling at least \$3,476,350.65 among 154 transactions.
- l. Grovee received funds from RoFx customers totaling at least \$229,788 among 27 transactions.
- m. Trans-Konsalt received funds from RoFx customers totaling at least €87,000 and \$157,800 among 20 transactions.

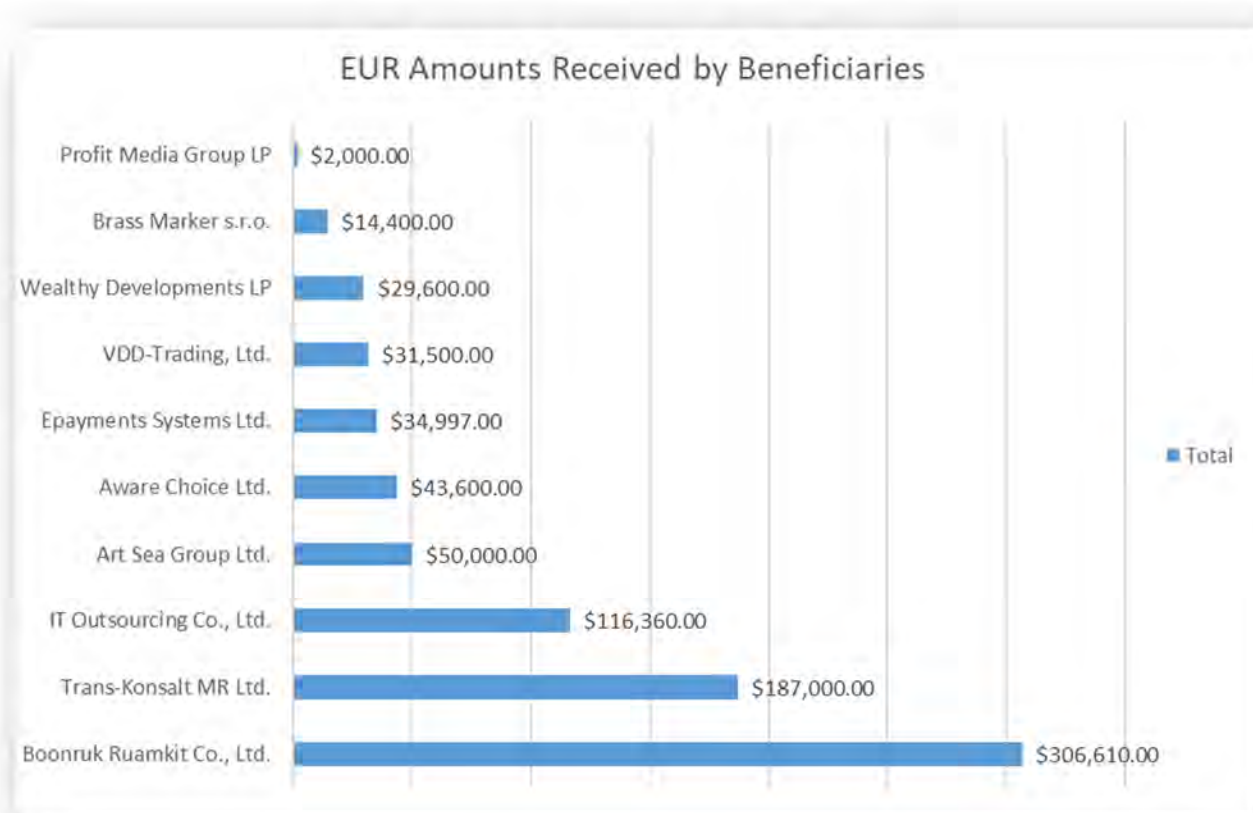
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<sup>20</sup> As previously explained, Plaintiffs are relying on an incomplete dataset and expect to uncover more transactions during the course of litigation.

- n. Boonruk received funds from RoFx customers totaling at least €306,610 and \$3,168,450.01 among 129 transactions.
- o. IT Outsourcing received funds from RoFx customers totaling at least €16,360 and \$144,858.76 among 56 transactions.
- p. Art Sea Group received funds from RoFx customers totaling at least €50,000 and \$258,452 among 5 transactions.

204. From 2018 to 2021, Plaintiffs have analyzed 824 transactions sent from RoFx Customers to RoFx Front or Layering Companies totaling €816,067 and \$15,914,842.36. *See id.* Plaintiffs estimate this represents only a fourth of the total investments received by the RoFx Front and Layering Companies. Total amounts sent to each Defendant are listed below:





### **Layering Companies**

205. The RoFx Operators used the Layering Companies to receive funds from the Front Companies in an attempt to obscure their Scheme. Plaintiffs have thus far identified Layering Companies ePayments and Boonruk.<sup>21</sup>

206. In 2018, Wealthy Developments sent at least two transactions to ePayments for a total of \$33,450. Ex. 9 at 2.

207. From 2020 to 2021, Boonruk received at least 132 transactions totaling \$7,994,730.

*Id.* Specifically, the following Front Companies transferred funds to Boonruk:

<sup>21</sup> Plaintiffs expect that many more transactions to Layering Companies exist and can be discovered through future discovery and investigation.

- a. Notus sent at least 66 transactions totaling \$3,057,330 between April 3, 2020 and October 8, 2020. *Id.*
- b. Shopostar sent 43 transactions totaling \$3,657,730 between October 15, 2020 and September 17, 2021. *Id.*
- c. Global E-Advantages sent at least 14 transactions totaling \$834,270 between October 13, 2020 and December 30, 2020. *Id.*
- d. Grovee sent 9 transactions for a total of \$445,400 between December 14, 2020 and March 30, 2021. *Id.*

### ***Cash-Out Companies***

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208. The **Cash-Out Companies** are the final step in the money laundering operation. These currently unknown entities received customer funds from the Layering Companies and ultimately distributed the funds to the RoFx Operators.

209. Upon information and belief, there are at least four Cash-Out Companies located in Europe and Asia.

## **IV. Named Plaintiffs' Allegations**

### **A. Plaintiff Ryan Birmingham**

210. Birmingham learned about RoFx between 2017 and 2018 through different forex trading review sites, Google searches, and Trustpilot. *See* Ex. 2; Ex. 4. Therein, the following false representations were made to him and other similarly situated customers:

- a. “this is the best robot/company to invest in, especially for beginners”;
- b. “utilized a robotic trading platform to make trade decisions on customers’ behalf”;
- c. “customers would receive a return on investment in the form of RoFx daily trading profits”;
- d. “a no loss guarantee, where RoFx would cover all daily losses”;
- e. “the principal was guaranteed or insured”; and
- f. “was partnered with Warren Buffet and Berkshire Hathaway.”

211. Persuaded by these misrepresentations, Birmingham created his RoFx account on June 3, 2018.

212. From June 2018 to mid-2021, Birmingham relied on RoFx's false representations and contributed approximately \$100,000 to the RoFx Scheme.

213. Relying on the RoFx promise of a 2% referral fee, Birmingham recruited his wife (Jill Birmingham), father (Kerry Birmingham), and grandmother (Phyllis Herington). Together with Birmingham, they contributed approximately \$400,000 to the RoFx Scheme—sending wire transfers to the following entities:

- a. Aware Choice (from 2018 to 2019);
- b. Brass Marker (in 2019);
- c. Auro Advantages (in 2019);
- d. Notus (in 2019);
- e. Easy Com (in 2021); and
- f. Shopostar (in 2021).

214. After Birmingham's family made the deposits, he noticed that his account was successfully credited the 2% referral fee.

215. In September 2021 the RoFx website went offline. Birmingham lost access to his funds. Realizing he had lost his contributions, and those of his family members, he decided to pursue this action.

#### **B. Plaintiff Roman Leonov**

216. Leonov first learned of RoFx in November of 2019 through promotions on Facebook and Reddit and via Trustpilot reviews. Leonov specifically remembers the following false representations about the RoFx Scheme:

- a. "the best automated forex trading robot in the world";

- b. they “guarantee coverage of losses”;
- c. “daily average win rate of approximately 0.0035%”; and
- d. customers could withdraw their funds at their discretion with “no-lock packages.”

217. To confirm the platform’s features, Leonov researched RoFx on MyFxBook.com and Trustpilot, where he read the false representations regarding RoFx published on those platforms. *See supra* ¶¶ 81, 84.

218. Leonov also researched RoFx by searching for relevant terms, including: “rofx review”; “rofx performance”; “guaranteed forex robot”; “proven expert advisor bot”; and “best robot forex trading.” This led Leonov to review the many press releases and related content containing misrepresentations about RoFx, deliberately seeded into the public domain by The Investing Online and the RoFx Operators. *See supra* ¶¶ 79–82.

219. Leonov registered for a RoFx account in May 2020 after reviewing these false representations.

220. Once he had his account, Leonov encountered further false information about RoFx’s alleged trading profits the Rofx Operators caused to be published on MyFxBook.com.

221. Relying on RoFx’s misrepresentations, Leonov made his first contribution to the Scheme in September of 2020.

222. Leonov felt more comfortable with his decision after seeing his funds and supposed profits displayed on the RoFx data dashboard on RoFx.net—unaware this was an instrument of pure fiction. The RoFx data dashboard consistently reflected his subsequent contributions as well.

223. Around October 2020, the RoFx Operators published false information ultimately distributed to both Yahoo Finance and the Associated Press discussing RoFx’s unique trading

approach and a fallacious assertion that Warren Buffet was interested in investing in, or acquiring, the RoFx.net platform.

224. Sometime in 2020, Leonov recalls RoFx promoting “Version 2”—an update to the RoFx platform that would allegedly increase the daily return from 0.0035% to 0.9%. As part of the updated RoFx platform, the Rofx Organizers touted a fabricated 2021 ICO together with the false promise of an in-person VIP customer conference in London, United Kingdom, sometime in 2022.

225. Leonov, reassured by the RoFx Operators’ deceit and their apparent plans for improving their services, contributed more money to the RoFx Scheme and purchased some BRKROFX tokens during the ICO pre-sale.

226. Between December 2020 and April 2021, believing the elaborate illusion RoFx had created, Leonov transferred a total of \$202,100 via 9 wire transfers. For each transfer, the RoFx Operators directed him to send funds to different Front Companies:

- a. Global E-Advantages (in 2020);
- b. Easy Com (in 2021);
- c. Grovee (in 2021); and
- d. Shopostar (in 2021).

227. Leonov also contributed approximately \$23,400 in bitcoin to the Scheme.

228. Throughout his relationship with the RoFx Scheme, Leonov received numerous invoices from:

- a. Grovee;
- b. Easy Com;
- c. Aware Choice;
- d. Shopostar;

- e. Notus; and
- f. Global E-Advantages.

229. In an email exchange, the RoFx Operators sent Leonov further fabrications, such as, “rofx is a group of companies, the owner of AI and neural networks, registered in the United Kingdom. ePayments Systems Ltd, the RoFx brokerage subdivision, subject to the jurisdiction of UK, regulated by FCA #900172.”

230. Leonov was permitted to withdraw small amounts from the RoFx Scheme. From December 2020 to September 2021, Leonov succeeded in withdrawing approximately \$11,200 in USD and Bitcoin. The withdrawals were sent by two Thai entities:

- a. Boonruk Ruamkit Co., and
- b. IT Outsourcing, Ltd.

231. On or about September 17, 2021, RoFx.net was non-functional.

232. Realizing he was scammed, Leonov decided to pursue this action.

### **C. Plaintiff Steven Hansen**

233. Hansen first heard about the RoFx Scheme in late December 2018. Through Google searches, Hansen encountered the misrepresentations the RoFx Operators seeded into the public domain to persuade people to invest. Specifically, that ROFX:

- a. “utilized a robotic trading platform to make trade decisions on customers’ behalf”;
- b. “customers would receive a return on investment in the form of RoFx daily trading profits”;
- c. had “a no loss guarantee, where RoFx would cover all daily losses”;
- d. contributions were safe because “the principal was guaranteed or insured”; and
- e. “was partnered with Warren Buffet and Berkshire Hathaway.”



234. In 2019, RoFx's fraudulent statements induced Hansen to contribute to the Scheme. Between 2019 to 2021, Steve contributed \$1,325,000 to the RoFx platform. Specifically, through his company Colton Capital Partners, Hansen sent RoFx eight wire transfers, directed to the following entities per the instructions provided by the RoFx Operators:

- a. Aware Choice (in 2019);
- b. Notus (in 2020); and
- c. Shopostar (from 2020 to 2021).

235. On or about September 17, 2021, Hansen realized he could not access the RoFx website. From that point on, he was no longer able to access his account.

236. Realizing he had been lured into a scam, Hansen decided to pursue this action.

**D. Plaintiff Jonathan Zarley**

237. Zarley first heard about RoFx in January 2020 after he saw a series of fraudulent advertisements the RoFx Operators caused to be displayed on Facebook. He was intrigued by RoFx because it was purportedly totally automated and passive.

238. Specifically, Zarley was deceived by misleading information about RoFx's specific features from Facebook ads, Google searches, and RoFx's website, all of which were designed to persuade people to contribute to the Scheme. Such deliberate misrepresentations include that:

- a. "RoFx was an automated trading platform";
- b. "the investment was safe and guaranteed, with loss coverage";
- c. "up to 12% monthly profit";
- d. "no lock period, allowing him to make withdrawals at any time";
- e. "profits were reliable, averaging 0.37%/day dating back to 2009, with an increase to .97%/day in version 2.0"; and
- f. "Berkshire Hathaway was interested in the RoFx ICO."

239. Manipulated by these fraudulent statements—about secure, guaranteed, passive profits—Zarley created an account on January 27, 2020. Right around this time, he also remembers reading a Readers’ Digest article promoting RoFx.

240. The illusion of authenticity lulled Zarley into making his first contribution to RoFx on January 28, 2020. Through May 26, 2021 he contributed \$2,042,000 to the RoFx Scheme through 27 wires—sent to various beneficiaries as directed by the RoFx Operators:

- a. Aware Choice (in 2020);
- b. Notus (in 2020);
- c. Global E-Advantages (from 2020 to 2021); and
- d. Shopostar (in 2021).

241. On July 9, 2020, Zarley, and other RoFx customers, received an email from the RoFx Operators introducing a new element to the RoFx façade—a profit calculator for customers to estimate their earnings based on the size of their accounts, program type, and time period. Zarley confirmed these purported projected profits with false trading information Ester posted on MyFxBook.com.

242. Between 2020 and 2021, Zarley was able to withdraw a relatively small portion of his funds from his RoFx account. All wire transfers sent to Zarley originated from Boonruk Ruamkit.

243. On September 17, 2021, Zarley realized that the RoFx.net website was unavailable, he could not access his account, RoFx phone numbers were disconnected, and emails to RoFx.net were going unanswered. He has not had contact with anyone from RoFx since.

244. Realizing he had been defrauded of his substantial contributions, Zarley decided to pursue this action.

### **E. Plaintiff Mitchell Parent**

245. Parent first heard about RoFx through a series of Facebook ads sowing false information that he saw between March and April 2020. The ads stated:

- a. “that RoFx was a robot that traded on the client’s behalf”;
- b. “an average daily profit of .38%”;
- c. “that your investment would be safe”; and
- d. “that RoFx was the only place that covered your losses with its reserve fund.”

246. The RoFx advertisements intrigued Parent and caused him to visit the RoFx.net website, where he reviewed the many misrepresentations published there. *See supra* ¶¶ 63–76.

247. Parent conducted a Google search looking for anything he could find about “rofx” and was exposed to numerous misrepresentations planted by the RoFx Operators on third-party websites—including the fake trading information on MyFxBook.com, the fake TrustPilot reviews, and stories about the fake Warren Buffet-RoFx relationship. *See supra* ¶¶ 79–90.

248. Relying on these numerous misrepresentations, in early 2020 Parent signed up for an account with the longest lock-in period because it charged a lower fee. Parent made his first contribution in April 2020. Through May 2021, Parent contributed \$491,000 to the RoFx Scheme through eight wire transfers, directed to different entities as instructed by the RoFx Operators:

- a. Notus (in 2020);
- b. Shopostar (from 2020 to 2021); and
- c. Easy Com (in 2021).

249. Throughout the period, he tracked the performance, made some limited withdrawals, and was manipulated into making larger contributions over time on account of the Scheme’s veneer of legitimacy. The RoFx Operators successfully bolstered their illusion of

authenticity by allowing Parent to withdraw \$8,880 from his account—sent via IT Outsourcing—along with a certain amount of bitcoin.

250. Influenced by the RoFx illusion and the promise of a referral fee, Parent persuaded his friends and family to contribute to the Scheme.

251. In September 2021 Parent realized RoFx.net was no long accessible; he was unable to access his account and now fears his contributed funds are gone.

252. Parent realized he had been defrauded and decided to pursue this action.

## **V. CLASS ACTION ALLEGATIONS**

253. This action is properly maintainable as a class action under Fed. R. Civ. P. 23(a) and (b)(3).

254. Plaintiffs bring this action on behalf of a Class consisting of:

**All persons who contributed funds to the RoFx foreign exchange trading scheme and all persons purchasing BRKROFX tokens.**

Excluded from the Class are:

- a. persons meeting the class definition but who were able to withdraw funds or realize income from the sale of BRKROFX tokens exceeding the person's aggregate consideration;
- b. Defendants, any entity or division in which Defendants have a controlling interest, and their legal representatives, officers, directors, agents, assigns, and successors;
- c. anyone employed by counsel for Plaintiffs in this action; and
- d. the judge to whom this case is assigned and the judge's staff.

### **A. This Action Satisfies Rule 23(a)**

255. This action meets the requirements of Rule 23(a) as follows:

- a. Numerosity. The proposed Class is so numerous and geographically dispersed that individual joinder of all members is impracticable. Already, Plaintiffs have received preliminary claim information from approximately 750 potential Class Members. This number is likely to increase.

- b. Commonality. There are questions of law and fact common to all Class Members. Such questions include, generally, whether Defendants, by their operation of the RoFx.net Scheme and subsequent Money Laundering Enterprise, violated the Racketeer Influenced and Corrupt Organizations Act; defrauded the Class Members; converted Class Members' property; and retained Class Members' monies unjustly.
- c. Typicality. Plaintiffs' claims are typical of Class members' claims because Plaintiffs and the Class all sustained injury from Defendants' wrongful conduct in a similar fashion. Plaintiffs and Class Members all contributed to the RoFx Scheme because they were falsely promised passive and automatic profits based on RoFx's nonexistent trading robot. Plaintiffs and Class Members were then further injured by the RoFx Money Laundering Enterprise, rendering return of their funds impossible without substantial additional expense and litigation. At bottom, Plaintiffs' claims arise from the same practices and course of conduct that give rise to the claims of the Class and are based on the same legal theories.
- d. Adequacy. Plaintiffs will fairly and adequately protect the interests of the Class. Indeed, Plaintiffs each have lost substantial sums to Defendants' misconduct and have spent considerable time and effort independently investigating Defendants and the RoFx Scheme, demonstrating their resolve to bring this matter to a satisfying resolution. Finally, Plaintiffs have engaged the undersigned counsel. Plaintiffs' counsel has considerable experience in class actions, cross-border asset recovery matters, and complex frauds; and has already invested substantial attorney time and its own funds in investigating and litigating this action—and is committed to continuing to do so. Plaintiffs' counsel is aware of its fiduciary duties to the Class and will continue to discharge those duties by seeking the maximum possible recovery for the Class Members. Neither Plaintiffs nor their counsel have interests antagonistic to the Class.

**B. This Action Satisfies Rule 23(b)(3).**

**Predominance under Rule 23(b)(3)**

256. Rule 23(b)(3)'s predominance requirement is satisfied because questions of law and fact common to the Class predominate over questions that may affect individual members and include, inter alia:

- a. Whether the RoFx Operators and Promoter Defendants made misrepresentations regarding the RoFx Scheme, via RoFx.net, mass emails to Plaintiffs and the Class, and third-party websites;
- b. Whether the RoFx Operators, Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, Layering Companies and

Principals, and Cash-Out Companies agreed to participate in the RoFx Scheme or the Money Laundering Enterprise;

- c. Whether the RoFx Operators, Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals performed overt acts in furtherance of the RoFx Scheme or the Money Laundering Enterprise;
- d. Whether the Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals assisted in or helped conceal the RoFx Scheme or the Money Laundering Enterprise;
- e. Whether the Facilitator and Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals knew of the RoFx Scheme when they participated in or concealed the Scheme through the Money Laundering Enterprise, or did so recklessly knowing the predictable results of their actions would further or conceal the Scheme; and
- f. Whether the RoFx Operators' disappearance and shutdown of the RoFx.net website rendered Plaintiffs and Class members' assets inaccessible, causing them damage.

257. Additionally, the common law state claims are similar enough across different jurisdictions—sharing common elements—that the common questions of law will predominate over questions that may affect individual members of the Class.

**Superiority under Rule 23(b)(3)**

258. A class action is superior to any other available means for the fair and efficient adjudication of this controversy for the following reasons:

- a. Many Class Members lack interest in individually controlling the prosecution of separate actions, because the claims of the majority of individual Class Members are small in relation to the expenses of litigation, making a class action the only procedure in which the majority of Class members can, as a practical matter, recover for the damages done to them by the Defendants;
- b. Plaintiffs are unaware of any other actions relating to this controversy having been brought by any Class Members, making the present action an efficient vehicle for resolving Class Members' claims;
- c. Plaintiffs' prosecution of the present action has already begun to bear fruit, rendering parallel individual actions duplicative and an inefficient use of judicial resources; and

- d. A class action would be superior to and more efficient than adjudicating a thousand or more potential individual lawsuits.

### CLAIMS FOR RELIEF

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**Count I: Violation of the RICO Act, 18 U.S.C. § 1962(c)  
Against the RoFx Operators, Company Organizer Defendants, Front Companies and  
Principals, and Layering Companies and Principals<sup>22</sup>**

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259. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252.
260. Plaintiffs and Defendants are “persons” within the meaning of 18 U.S.C. § 1962(c).

#### *The RICO Enterprise*

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261. The RoFx Operators, and the Company Organizer Defendants, Front Companies and Principals, Layering Companies and Principals, and Cash-Out Companies (collectively, the “Laundering Defendants”) are a group of persons associated together in fact for the common purpose of carrying out an ongoing criminal enterprise—the Money Laundering Enterprise described in paragraphs 128 to 209, *supra*—to hide, launder, and otherwise wrongfully retain the proceeds of the RoFx Scheme. After acquiring the funds from the RoFx Scheme, the RoFx Operators, together with the Laundering Defendants, laundered the money across the globe through a variety of international banks, shell companies, and cryptocurrency exchanges.

262. The RoFx Operators and the Laundering Defendants engaged in a coordinated campaign of money laundering and wire fraud, employing numerous unlawful interstate and international financial transactions involving laundered funds.

263. In this manner, RoFx Operators and the Laundering Defendants conspired to and did form an association-in-fact to misappropriate and launder Plaintiffs’ funds through a pattern of criminal activity for a common purpose within the meaning of 18 U.S.C. §§ 1961(4) and 1962(c).

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<sup>22</sup> As identified in Part II.

264. The RoFx Operators and the Laundering Defendants are associated with the Money Laundering Enterprise within the meaning of 18 U.S.C. § 1962(c). Each of their roles and acts is detailed in paragraphs 128 to 209, *supra*.

265. Beginning on or around January 2018 to present, the Money Laundering Enterprise was in, and its activities affected, interstate and foreign commerce within the meaning of 18 U.S.C. § 1962(c).

***Pattern of Racketeering Activity***

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266. The RoFx Operators and the Laundering Defendants participated, directly and indirectly, in the conduct, management, or operation of the Money Laundering Enterprise's affairs through a "pattern of racketeering activity" within the meaning of 8 U.S.C. § 1961(5) and in violation of 18 U.S.C. § 1962(c), as follows:

***Money Laundering in Violation of 18 U.S.C. § 1956(a)(1)(B)(i)***

267. The RoFx Operators and the Laundering Defendants committed acts of money laundering in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

268. The RoFx Operators and the Laundering Defendants knowingly conducted financial transactions identified in paragraphs 203 to 209, and as shown in Exhibits 6 and 9.

269. At the time the RoFx Operators directed those transactions and the Laundering Defendants executed them, each of the Defendants knew the property involved represented the proceeds of some form of unlawful activity.

270. The property involved in those financial transactions was in fact derived from specific unlawful activity within the meaning of 18 U.S.C. § 1956(a)(1) and (c)(7)—namely, the RoFx Scheme described in paragraphs 61 to 127, *supra*.

271. The RoFx Operators and the Laundering Defendants knew the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, or



control of the proceeds of specific unlawful activity within the meaning of 18 U.S.C. § 1956(a)(1)(B)(i) and (c)(7)—namely, the RoFx Scheme described in paragraphs 61 to 127.

272. These financial transactions identified in paragraphs 203 to 209 affected interstate commerce and foreign commerce by: (a) depositing proceeds of specified unlawful activity in financial institutions in the United States; (b) moving funds by wire or other means that affected interstate or foreign commerce, or (c) using financial institutions which are engaged in, or the activities of which affect, interstate or foreign commerce.

**Money Laundering in Violation of 18 U.S.C. § 1956(a)(1)(A)(i)**

273. The RoFx Operators and the Laundering Defendants committed acts of money laundering in violation of 18 U.S.C. § 1956(a)(1)(A)(i).

274. The RoFx Operators and the Laundering Defendants knowingly conducted the financial transactions identified in paragraphs 203 to 209, and as shown in Exhibits 6 and 9.

275. At the same time the RoFx Operators directed those transactions and the Laundering Defendants executed them, each of the Defendants knew the property involved represented the proceeds of some form of unlawful activity.

276. The property involved in those financial transactions was in fact derived from specific unlawful activity within the meaning of 18 U.S.C. § 1956(a)(1) and (c)(7)—namely, the RoFx Scheme described in paragraphs 61 to 127.

277. The RoFx Operators and the Laundering Defendants had the intent to promote the carrying on of specified unlawful activity within the meaning of 18 U.S.C. § 1956(a)(1)(A)(i) and (c)(7)—namely, the RoFx Scheme described in paragraphs 61 to 127.

278. These financial transactions identified in paragraphs 203 to 209 affected interstate commerce and foreign commerce by: (a) depositing proceeds of specified unlawful activity in financial institutions in the United States; (b) moving funds by wire or other means that affected

interstate or foreign commerce, or (c) using financial institutions which are engaged in, or the activities of which affect, interstate or foreign commerce.

**Money Laundering in Violation of 18 U.S.C. § 1956(a)(2)(A)**

279. The RoFx Operators and the Laundering Defendants committed acts of money laundering in violation of 18 U.S.C. § 1956(a)(2)(A).

280. The RoFx Operators and the Laundering Defendants knowingly transported, transmitted, or transferred monetary instruments or funds from a place in the United States to or through a place outside the United States via the transactions identified in paragraphs 203 to 209.

281. The RoFx Operators and the Laundering Defendants did so with the intent to promote the carrying on of specified unlawful activity within the meaning of 18 U.S.C. § 1956(a)(2)(A) and (c)(7)—namely, the RoFx Scheme described in paragraphs 61 to 127.

**Money Laundering in Violation of 18 U.S.C. § 1956(a)(2)(B)(i)**

282. The RoFx Operators and the Laundering Defendants committed acts of money laundering in violation of 18 U.S.C. § 1956(a)(2)(B)(i).

283. The RoFx Operators and the Laundering Defendants knowingly transported, transmitted, or transferred monetary instruments or funds from a place in the United States to or through a place outside the United States via the transactions identified in paragraphs 203 to 209.

284. The RoFx Operators and the Laundering Defendants did so knowing the monetary instruments or funds involved in the transportation, transmission, or transfer represented the proceeds of some form of unlawful activity—namely, the RoFx Scheme described in paragraphs 61 to 127—and knowing that such transportation, transmission, or transfer was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity within the meaning of 18 U.S.C. § 1956(a)(2)(B)(i) and (c)(7); specifically, the RoFx Scheme described in paragraphs 61 to 127.

**Monetary Transactions in Property Derived from Unlawful Activity in Violation of 18 U.S.C. § 1957**

285. The RoFx Operators and the Laundering Defendants committed acts of money laundering in violation of 18 U.S.C. § 1957.

286. The RoFx Operators and the Laundering Defendants engaged in monetary transactions in criminally derived property that is of a value greater than \$10,000 and is derived from specified unlawful activity within the meaning of 18 U.S.C. § 1957(a) and (f)(3)—namely, the RoFx Scheme described in paragraphs 61 to 127. These monetary transactions are detailed in paragraphs 203 to 209.

287. These financial transactions affected interstate commerce and foreign commerce by: (a) depositing proceeds of specified unlawful activity in financial institutions in the United States; or (b) involving the use of financial institutions which are engaged in, or the activities of which affect, interstate or foreign commerce.

288. Each such monetary transaction either (a) took place in the United States, or (b) took place outside of the United States, and at least one Defendant is a “United States person” within the meaning of 18 U.S.C. § 1957(d)(2) and § 3077.

**Transportation of Stolen, Converted, or Fraudulently-Taken Goods, Securities, or Money in Violation of 18 U.S.C. § 2314**

289. The RoFx Operators and the Laundering Defendants committed acts of money laundering in violation of 18 U.S.C. § 2314.

290. The RoFx Operators and the Laundering Defendants transported, transmitted, or transferred goods, securities, or money, of a value of \$5,000 or more—namely, the RoFx Scheme described in paragraphs 61 to 127—in interstate or foreign commerce. These transactions are identified in paragraphs 203 to 209.

291. The RoFx Operators and the Laundering Defendants did so knowing the money was stolen, converted, or taken by the RoFx Scheme's fraud or artifice.

**Receipt, Possession, Concealment, Sale, or Disposal of Stolen, Converted, or Taken Goods in Violation of 18 U.S.C. § 2315**

292. The RoFx Operators and the Laundering Defendants committed acts of money laundering in violation of 18 U.S.C. § 2315.

293. The RoFx Operators and the Laundering Defendants received, possessed, concealed, sold, or disposed of goods, securities, or money that is of a value of \$5,000 or more and that crossed a State or United States boundary after being stolen, unlawfully converted, or taken—namely, the RoFx Scheme described in paragraphs 61 to 127. These transactions are identified in paragraphs 203 to 209.

294. The RoFx Operators and the Laundering Defendants did so knowing the money had been stolen, unlawfully converted, or taken via the RoFx Scheme.

**Wire Fraud in Violation of 18 U.S.C. § 1343**

295. The RoFx Operators and the Laundering Defendants committed acts of money laundering in violation of 18 U.S.C. § 1343.

296. With specific intent to defraud, the RoFx Operators and the Laundering Defendants knowingly devised or participated in a scheme to defraud the Plaintiffs by means of material misstatements and omissions, specifically that Plaintiffs' contributions:

- a. would be utilized by RoFx's forex robot trading platform to make trade decisions on behalf of Plaintiffs and for Plaintiffs' benefit, as set forth in paragraphs 61 to 70 and 102 to 127;
- b. would be committed to foreign exchange trading so that Plaintiffs could receive a return on investment in the form of a percentage of RoFx's daily trading profit, as set forth in paragraphs 65 to 67 and 102 to 127;
- c. could be withdrawn by Plaintiffs at their discretion, as set forth in paragraphs 81 to 91 and 110;

- d. would remain in each respective Plaintiffs' accounts for their own use, as set forth in paragraph 111; and
- e. would increase in value because the RoFx Scheme would be partnering with Warren Buffet and Berkshire Hathaway, as set forth in paragraph 87 to 90 and 114.

297. The objective of the scheme to defraud was to preserve and misappropriate the ill-gotten funds for the RoFx Operators and the Laundering Defendants, and to continue to deprive the Plaintiffs of the money that was wrongfully taken from them by means of the RoFx Scheme. Through the scheme to defraud, the RoFx Operators were able to conceal their identities and their possession and control over the RoFx Scheme's proceeds.

298. In furtherance of the scheme to defraud, the RoFx Operators and the Laundering Defendants transmitted or caused to be transmitted communications by means of wire in interstate or foreign commerce as set forth in paragraphs 203 to 209.

#### **Nature of Pattern of Racketeering**

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299. The RoFx Operators and the Laundering Defendants committed a substantial number of related predicate acts over an extended period of time: the predicate acts enumerated at paragraphs 267 to 298, *supra*. Their commission of these predicate acts is part of a general course of business and will continue unless and until they are prevented from committing such acts.

#### **Injuries to the Plaintiffs**

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300. The Plaintiffs were, and continue to be, injured by reason of the RoFx Operators' and the Laundering Defendants' violations of 18 U.S.C. § 1962(c) and the predicate acts enumerated in paragraphs 267 to 298, *supra*.

301. The injuries to the Plaintiffs include the continued deprivation of money taken from the Plaintiffs by means of the RoFx Scheme and by significant legal fees and related costs in attempting to address the unlawful conduct and recover what rightfully belongs to Plaintiffs.

302. Despite their diligence and efforts, the Plaintiffs' discovery of these ongoing injuries was delayed by the RoFx Operators' and the Laundering Defendants' fraudulent concealment activity as set forth in paragraphs 128 to 209, *supra*.

303. The injuries to the Plaintiffs were a direct, proximate, and reasonably foreseeable result of the violations of 18 U.S.C. § 1962(c) and the predicate acts enumerated at Paragraphs 267 to 298, *supra*. The Plaintiffs have been and will continue to be injured in an amount to be determined at trial.

304. Pursuant to 18 U.S.C. § 1964(c), the Plaintiffs are entitled to recover treble damages plus costs and attorneys' fees from the RoFx Operators and the Laundering Defendants.

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**Count II: RICO Conspiracy, 18 U.S.C. § 1962(d)  
Against the RoFx Operators, Company Organizer Defendants, Front Companies and  
Principals, and Layering Companies and Principals<sup>23</sup>**

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305. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252, 267 to 298, and 300 to 304.

306. The RoFx Operators and Laundering Defendants violated 18 U.S.C. § 1962(d) by conspiring to violate 18 U.S.C. § 1962(c).

307. In connection with the Money Laundering Enterprise, the RoFx Operators and Laundering Defendants agreed to accomplish an unlawful plan to engage in a pattern of racketeering activity—as detailed in Count I, *supra*.

308. The RoFx Operators and Laundering Defendants agreed to the overall objective of the conspiracy, or they agreed to commit personally at least two acts of racketeering, specifically the predicate acts enumerated in paragraphs 267 to 298, *supra*.

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<sup>23</sup> As identified in Part II.

309. As a direct and proximate result of the predicate acts taken in furtherance of the conspiracy, the Plaintiffs have been injured in their business or property as set forth in paragraphs 300 to 304, *supra*.

310. Despite their diligence and efforts, the Plaintiffs' discovery of these ongoing injuries was delayed by the RoFx Operators' and the Laundering Defendants' fraudulent concealment activity as set forth in paragraphs 128 to 209, *supra*.

311. Pursuant to 18 U.S.C. § 1964(c), the Plaintiffs are entitled to recover treble damages plus costs and attorneys' fees from the RoFx Operators and the Laundering Defendants.

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**Count III: Common Law Fraud**  
**Against the RoFx Operators, Peter Mohylny, and Promoter Defendants<sup>24</sup>**

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312. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252.

313. The RoFx Operators, Ester Holdings, and The Investing Online each made false statements of material fact regarding the RoFx Scheme. Specifically:

- a. Alex Doe and John Does 1–3 made the misrepresentations detailed in paragraphs 61 to 125, *supra*.
- b. Peter Mohylny published, or caused to be published, the RoFx.net misrepresentations detailed in paragraphs 63–76, *supra*.
- c. Ester Holdings published false foreign exchange trading data, as detailed in paragraphs 81 and 124, *supra*.
- d. The Investing Online made and published—or caused to be published—the misrepresentations detailed in paragraphs 82, 87, and 125, *supra*.

314. The RoFx Operators, Peter Mohylny, Ester Holdings, and The Investing Online made each misrepresentation in paragraph 313 with knowledge that the statements were false and intent that others would be induced to contribute to the RoFx Scheme.

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<sup>24</sup> As identified in Part II.

315. Plaintiffs and the Class relied on the misrepresentations in paragraph 313 and contributed \$75 million or more into the illusory RoFx Scheme, including amounts spent on BRKROFX tokens.

316. Plaintiffs' and the Class's contributions to the Scheme actually and proximately caused Plaintiffs and the Class damage when the RoFx Scheme collapsed, rendering Plaintiffs' funds inaccessible to Plaintiffs and the Class. *See supra* ¶¶ 126–127.

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**Count IV: Conspiracy to Commit Fraud  
Against Peter Mohylny and the Promoter Defendants, Company Organizer Defendants,  
Front Companies and Principals, and Layering Companies and Principals<sup>25</sup>**

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317. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252.

318. This Count is pleaded in the alternative to Count III, *supra*, as against Peter Mohylny and the Promoter Defendants, Ester Holdings and The Investing Online.

319. Peter Mohylny and the Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals agreed to participate with one or more of the RoFx Operators to commit the fraud detailed in Count III, *supra*, doing so knowing they were furthering or concealing the fraud or, alternatively, doing so recklessly knowing the predictable result of their actions would further or conceal the fraud.

320. Each of Peter Mohylny and the Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals executed overt acts pursuant to the conspiracy:

- a. Peter Mohylny published, or caused to be published, the RoFx.net misrepresentations detailed in paragraphs 63–76, *supra*.
- b. Ester Holdings published false foreign exchange trading data, as detailed in paragraphs 81 and 124, *supra*, enabling the RoFx Operators to provide

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<sup>25</sup> As identified in Part II.



customers with the illusion that RoFx was actually performing foreign exchange trades.

- c. The Investing Online made and published, or caused to be published, the misrepresentations detailed in paragraphs 82, 87, and 125, *supra*, enabling the RoFx Operators to create the illusion that RoFx was a popular, credible, and reliable foreign exchange trading service using a successful trading algorithm.
- d. Wealthy Developments used its bank accounts to receive and move RoFx customer funds, including paying ePayments for its role in the conspiracy. *See supra* ¶¶ 132–136, 140.
- e. Anton Bilous used his control of Wealthy Developments and its bank accounts to receive and move RoFx customer funds, including paying ePayments for its role in the conspiracy, and to establish a relationship with ePayments to use for the benefit of the RoFx Operators. *See supra* ¶¶ 132–136, 140.
- f. ePayments used its accounts and financial services to receive and move RoFx customer funds, concealing the illicit flow of funds to, ultimately, the RoFx Operators. *See supra* ¶¶ 133–139.
- g. Aware Choice used its bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 142–145.
- h. VDD used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 151–153.
- i. Dmytro Fokin used his control of Aware Choice and VDD’s bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; transferred these monies to, ultimately, the RoFx Operators; and ultimately dissolved Aware Choice to conceal the Money Laundering Enterprise. *See supra* ¶¶ 142–145, 151–153.
- j. Ivan Hrechaniuk used his control of Aware Choice’s bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; transferred these monies to, ultimately, the RoFx Operators; and ultimately dissolved Aware Choice to conceal the Money Laundering Enterprise. *See supra* ¶¶ 142–145.
- k. Manuchar Daraselia used his control of VDD’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 151–153.

- l. Brass Marker used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 146–148.
- m. Sergiy Prokopenko used his control of Brass Marker’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 146–148.
- n. Profit Media used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 149–150.
- o. Auro Advantages used its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including a payment to ePayments; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 156–160.
- p. Borys Konovalenko, directly or through agents, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds; Konovalenko also directed that Notus be dissolved to help cover the financial tracks of the RoFx funds through Notus. *See supra* ¶¶ 162–181.
- q. Mayon Holding Ltd, directly or via its agent Marina Garda, wholly-controlled subsidiaries Mayon Solutions Ltd and Mayon Solutions LLC, and Konovalenko provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- r. Marina Garda, directly or through her signatory authority over Mayon Holding and, in turn, her control over subsidiaries Mayon Solutions Ltd and Mayon Solutions LLC, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- s. Mayon Solutions Ltd, directly or via Konovalenko and Director Olga Tielly, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- t. Olga Tielly, as Director of Mayon Solutions Ltd, executed the RoFx Services Agreement which provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- u. Mayon Solutions, LLC, directly or via Konovalenko and Manager Daria Eckert, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in

collecting and moving RoFx customer funds; and Mayon Solutions, LLC, received some of the proceeds of the RoFx Service Agreement. *See supra* ¶¶ 162–181.

- v. Daria Eckert, as manager of Mayon Solutions, LLC, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- w. Notus used its bank accounts to receive and move RoFx customer funds, receiving bulk transfers of funds from U.S. Front Companies and sending those funds to Aware Choice, Trans-Konsalt, and Boonruk Ruamkit; and to pay Borys, Mayon Solutions Ltd, Mayon Solutions, LLC, and Alla Skala for their roles in the RoFx conspiracy. *See supra* ¶¶ 171–172.
- x. Global E-Advantages used its bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including sending funds to Notus and Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶ 177.
- y. Alla Skala used her access to Notus and Global E-Advantages’s bank accounts to receive and move RoFx customer funds, receiving bulk transfers of funds from U.S. Front Companies and sending those funds to Aware Choice, Trans-Konsalt, and Boonruk Ruamkit; and to pay Borys, Mayon Solutions Ltd, Mayon Solutions, LLC, and herself for their roles in the RoFx conspiracy. *See supra* ¶¶ 171–172, 177.
- z. Olga Abrykosova managed the flow of RoFx customer funds through the bank accounts of Notus and Global E-Advantages, sending those funds to various other entities as directed by Alex Doe and the other RoFx Operators—including funds sent to Aware Choice, Trans-Konsalt, Boonruk, Borys, Mayon, and Alla Skala. *See supra* ¶¶ 172, 177–178.
- aa. Anna Shymko formed Easy Com to provide the RoFx Operators a Front Company for creating a bank account and integrating customer funds into the financial system; and also dissolved Notus to conceal the RoFx Operators’ wrongdoing. *See supra* ¶¶ 179–181.
- bb. Timothy Stubbs agreed to use his authority as manager for Grovee to provide the RoFx Operators a Front Company for creating bank accounts and integrating customer funds into the financial system; Stubbs then transferred the funds as directed by the RoFx Operators. *See supra* ¶¶ 182–186.
- cc. Easy Com used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 180.

- dd. Jase Victor Davis used his access to Easy Com’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 180.
- ee. Shopostar used its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including to Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 173–175.
- ff. Nataliya Los used her access to Shopostar and its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including to Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 173–175.
- gg. Grovee used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 183.
- hh. Jared Goodyear used its (or his) bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 187.
- ii. Trans-Konsalt used its bank accounts to receive and move RoFx customer funds, including bulk amounts from Notus, and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 190–193.
- jj. Boonruk Ruamkit used its bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including bulk amounts from U.S. Front Companies, and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 194–196.
- kk. IT Outsourcing used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 197–198.
- ll. Nattpemol Krinara created IT Outsourcing and its bank accounts to use for transferring RoFx customer funds and used her control over Boonruk and IT Outsourcing’s bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including receiving bulk amounts from U.S. Front Companies; and, ultimately transferred those monies to the RoFx Operators themselves. *See supra* ¶¶ 194–198.
- mm. Papahratsorn Raviratporn created IT Outsourcing to transfer RoFx customer funds and help conceal the Money Laundering Enterprise by distributing transactions into IT Outsourcing. *See supra* ¶¶ 197–198.

- nn. Art Sea Group used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 199–201.

321. Defendants’ acts, detailed in paragraph 320, facilitated, promoted, or concealed the fraud, actually and proximately causing damage to Plaintiffs and the Class for the amounts contributed to the RoFx Scheme. *See supra* ¶ 316.

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**Count V: Aiding and Abetting Fraud**  
**Against Peter Mohylny and the Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals<sup>26</sup>**

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322. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252.

323. This Count is pleaded in the alternative to Count IV, *supra*, as against Peter Mohylny and the Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals.

324. Peter Mohylny and the Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals aided the RoFx Operators to commit or conceal the fraud detailed in Count III, *supra*, doing so knowing they were assisting the RoFx Operators commit or conceal the fraud or, alternatively, doing so recklessly, knowing the predictable result of their actions would assist the RoFx Operators to commit or conceal the fraud.

325. Each of Peter Mohylny and the Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals substantially assisted the RoFx Operators to commit or conceal the fraud:

- a. Peter Mohylny published, or caused to be published, the RoFx.net misrepresentations detailed in paragraphs 63–76, *supra*.

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<sup>26</sup> As identified in Part II.

- b. Ester Holdings published false foreign exchange trading data, as detailed in paragraphs 81 and 124, *supra*, enabling the RoFx Operators provide customers with the illusion that RoFx was actually performing foreign exchange trades.
- c. The Investing Online made and published, or caused to be published, the misrepresentations detailed in paragraphs 82, 87, and 125, *supra*, enabling the RoFx Operators to create the illusion that RoFx was a popular, credible, and reliable foreign exchange trading service using a successful trading algorithm.
- d. Wealthy Developments used its bank accounts to receive and move RoFx customer funds, including paying ePayments for its role in assisting the RoFx Operators in committing or concealing the fraud. *See supra* ¶¶ 132–136, 140.
- e. Anton Bilous used his control of Wealthy Developments and its bank accounts to receive and move RoFx customer funds, including paying ePayments for its role in assisting the RoFx Operators in committing or concealing the fraud, and to establish a relationship with ePayments to use for the benefit of the RoFx Operators. *See supra* ¶¶ 132–136, 140.
- f. ePayments used its accounts and financial services to receive and move RoFx customer funds, concealing the illicit flow of funds to, ultimately, the RoFx Operators. *See supra* ¶¶ 133–139.
- g. Aware Choice used its bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 142–145.
- h. VDD used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators *See supra* ¶¶ 151–153.
- i. Dmytro Fokin used his control of Aware Choice and VDD’s bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; transferred these monies to, ultimately, the RoFx Operators; and ultimately dissolved Aware Choice to conceal the Money Laundering Enterprise. *See supra* ¶¶ 142–145, 151–153.
- j. Ivan Hrechaniuk used his control of Aware Choice’s bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; transferred these monies to, ultimately, the RoFx Operators; and ultimately dissolved Aware Choice to conceal the Money Laundering Enterprise. *See supra* ¶¶ 142–145.
- k. Manuchar Daraselia used his control of VDD’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 151–153.

- l. Brass Marker used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 146–148.
- m. Sergiy Prokopenko used his control of Brass Marker’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 146–148.
- n. Profit Media used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 149–150.
- o. Auro Advantages used its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including a payment to ePayments; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 156–160.
- p. Borys Konovalenko, directly or through agents, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds; Konovalenko also directed that Notus be dissolved to help cover the financial tracks of the RoFx funds through Notus. *See supra* ¶¶ 162–181.
- q. Mayon Holding Ltd, directly or via its agents Marina Garda, wholly-controlled subsidiaries Mayon Solutions Ltd and Mayon Solutions LLC, and Konovalenko provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- r. Marina Garda, directly or through her signatory authority over Mayon Holding and, in turn, her control over subsidiaries Mayon Solutions Ltd and Mayon Solutions LLC, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- s. Mayon Solutions Ltd, directly or via Konovalenko and Director Olga Tielly, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- t. Olga Tielly, as Director of Mayon Solutions Ltd, executed the RoFx Services Agreement which provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- u. Mayon Solutions, LLC, directly or via Konovalenko and Manager Daria Eckert, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in

collecting and moving RoFx customer funds; and Mayon Solutions, LLC, received some of the proceeds of the RoFx Service Agreement. *See supra* ¶¶ 162–181.

- v. Daria Eckert, as manager of Mayon Solutions, LLC, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- w. Notus used its bank accounts to receive and move RoFx customer funds, receiving bulk transfers of funds from U.S. Front Companies and sending those funds to Aware Choice, Trans-Konsalt, and Boonruk Ruamkit; and to pay Borys, Mayon Solutions Ltd, Mayon Solutions, LLC, and Alla Skala for their roles in assisting the RoFx Operators in committing or concealing the fraud. *See supra* ¶¶ 171–172.
- x. Global E-Advantages used its bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including sending funds to Notus and Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶ 177.
- y. Alla Skala used her access to Notus and Global E-Advantages’s bank accounts to receive and move RoFx customer funds, receiving bulk transfers of funds from U.S. Front Companies and sending those funds to Aware Choice, Trans-Konsalt, and Boonruk Ruamkit; and to pay Borys, Mayon Solutions Ltd, Mayon Solutions, LLC, and herself for their roles in assisting the RoFx Operators in committing or concealing the fraud. *See supra* ¶¶ 171–172, 177.
- z. Olga Abrykosova managed the flow of RoFx customer funds through the bank accounts of Notus and Global E-Advantages, sending those funds to various other entities as directed by Alex Doe and the other RoFx Operators—including funds sent to Aware Choice, Trans-Konsalt, Boonruk, Borys, Mayon, and Alla Skala. *See supra* ¶¶ 172, 177–178.
- aa. Anna Shymko formed Easy Com to provide the RoFx Operators a Front Company for creating a bank account and integrating customer funds into the financial system; and also dissolved Notus to conceal the RoFx Operators’ wrongdoing. *See supra* ¶¶ 179–181.
- bb. Timothy Stubbs used his authority as manager for Grovee to provide the RoFx Operators a Front Company for creating bank accounts and integrating customer funds into the financial system; Stubbs then transferred the funds as directed by the RoFx Operators. *See supra* ¶¶ 182–186.
- cc. Easy Com used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 180.



- dd. Jase Victor Davis used his access to Easy Com’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 180.
- ee. Shopostar used its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including to Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 173–175.
- ff. Nataliya Los used her access to Shopostar and its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including to Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 173–175.
- gg. Grovee used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 183.
- hh. Jared Goodyear used its (or his) bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 187.
- ii. Trans-Konsalt used its bank accounts to receive and move RoFx customer funds, including bulk amounts from Notus, and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 190–193.
- jj. Boonruk Ruamkit used its bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including bulk amounts from U.S. Front Companies, and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 194–196.
- kk. IT Outsourcing used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 197–198.
- ll. Nattpemol Krinara created IT Outsourcing and its bank accounts to use for transferring RoFx customer funds and used her control over Boonruk and IT Outsourcing’s bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including receiving bulk amounts from U.S. Front Companies; and, ultimately transferred those monies to the RoFx Operators themselves. *See supra* ¶¶ 194–198.
- mm. Papahratsorn Raviratporn created IT Outsourcing to use for transferring RoFx customer funds and help conceal the Money Laundering Enterprise by distributing transactions into IT Outsourcing. *See supra* ¶¶ 197–198.

nn. Art Sea Group used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 199–201.

326. Defendants’ acts, detailed in paragraph 325, facilitated, promoted, or concealed the fraud, actually and proximately causing damage to Plaintiffs and the Class for the amounts contributed to the RoFx Scheme. *See supra* ¶ 316.

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**Count VI: Conversion  
Against the RoFx Operators**

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327. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252.

328. After accepting \$50 million or more in funds from Plaintiffs and the Class, on or about September 17, 2021, the RoFx Operators ceased operating the illusory RoFx Scheme without any authority to do so, intending to deprive Plaintiffs and the Class of their contributed funds.

329. The funds Plaintiffs and the Class contributed to the RoFx Scheme were described and identified by the RoFx Operators using periodically-generated account statements sent to each Plaintiff and Class Member, which funds the RoFx Operators were obligated to treat in a specific manner—for automated foreign exchange trading to be performed by brokers—by the RoFx Operators’ representations and the consideration provided by Plaintiffs and the Class

330. Inconsistent with Plaintiffs’ and the Class’s ownership interest in their RoFx contributions, the RoFx Operators’ unauthorized shutdown of the RoFx Scheme deprived Plaintiffs and the Class their funds contributed to the RoFx Scheme.

331. The ROFX Operators’ improper acts or practices of refusing to return Plaintiffs’ funds is the actual and proximate cause of the damages sustained by Plaintiffs and the Class.

332. The RoFx Operators’ unauthorized deprivation of the contributed funds was the actual and proximate cause of damage to Plaintiffs and the Class for the amounts contributed to the RoFx Scheme—\$75 million or more. *See supra* ¶¶ 126–127.

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**Count VII: Conspiracy to Commit Conversion  
Against Peter Mohylny and the Company Organizer Defendants, Front Companies and  
Principals, and Layering Companies and Principals**

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333. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252.

334. Peter Mohylny and the Promoter Defendants, Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals, agreed to participate with the RoFx Operators to commit conversion as detailed in Count VI, *supra*, doing so knowing they were furthering or concealing conversion of the RoFx customers' funds or, alternatively, doing so recklessly knowing the predictable result of their actions would further or conceal conversion of the RoFx customers' funds.

335. Each of Peter Mohylny and the Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals executed overt acts pursuant to the conspiracy:

- a. Peter Mohylny caused the RoFx.net to cease operating or deliberately allowed the RoFx.net domain to lapse, preventing Plaintiffs and the Class Members from accessing their RoFx.net accounts.
- b. Wealthy Developments used its bank accounts to receive and move RoFx customer funds, including paying ePayments for its role in the conspiracy. *See supra* ¶¶ 132–136, 140.
- c. Anton Bilous used his control of Wealthy Developments and its bank accounts to receive and move RoFx customer funds, including paying ePayments for its role in the conspiracy, and to establish a relationship with ePayments to use for the benefit of the RoFx Operators. *See supra* ¶¶ 132–136, 140.
- d. ePayments used its accounts and financial services to receive and move RoFx customer funds, concealing the illicit flow of funds to, ultimately, the RoFx Operators. *See supra* ¶¶ 133–139.
- e. Aware Choice used its bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 142–145.

- f. VDD used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators *See supra* ¶¶ 151–153.
- g. Dmytro Fokin used his control of Aware Choice and VDD’s bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; transferred these monies to, ultimately, the RoFx Operators; and ultimately dissolved Aware Choice to conceal the Money Laundering Enterprise. *See supra* ¶¶ 142–145, 151–153.
- h. Ivan Hrechaniuk used his control of Aware Choice’s bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; transferred these monies to, ultimately, the RoFx Operators; and ultimately dissolved Aware Choice to conceal the Money Laundering Enterprise. *See supra* ¶¶ 142–145.
- i. Manuchar Daraselia used his control of VDD’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 151–153.
- j. Brass Marker used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 146–148.
- k. Sergiy Prokopenko used his control of Brass Marker’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 146–148.
- l. Profit Media used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 149–150.
- m. Auro Advantages used its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including a payment to ePayments; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 156–160.
- n. Borys Konovalenko, directly or through agents, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds; Konovalenko also directed that Notus be dissolved to help cover the financial tracks of the RoFx funds through Notus. *See supra* ¶¶ 162–181.
- o. Mayon Holding Ltd, directly or via its agent Marina Garda, wholly-controlled subsidiaries Mayon Solutions Ltd and Mayon Solutions LLC, and Konovalenko provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.

- p. Marina Garda, directly or through her signatory authority over Mayon Holding and, in turn, her control over subsidiaries Mayon Solutions Ltd and Mayon Solutions LLC, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- q. Mayon Solutions Ltd, directly or via Konovalenko and Director Olga Tielly, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- r. Olga Tielly, as Director of Mayon Solutions Ltd, executed the RoFx Services Agreement which provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- s. Mayon Solutions, LLC, directly or via Konovalenko and Manager Daria Eckert, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds; and Mayon Solutions, LLC, received some of the proceeds of the RoFx Service Agreement. *See supra* ¶¶ 162–181.
- t. Daria Eckert, as manager of Mayon Solutions, LLC, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- u. Notus used its bank accounts to receive and move RoFx customer funds, receiving bulk transfers of funds from U.S. Front Companies and sending those funds to Aware Choice, Trans-Konsalt, and Boonruk Ruamkit; and to pay Borys, Mayon Solutions Ltd, Mayon Solutions, LLC, and Alla Skala for their roles in the RoFx conspiracy. *See supra* ¶¶ 171–172.
- v. Global E-Advantages used its bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including sending funds to Notus and Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶ 177.
- w. Alla Skala used her access to Notus and Global E-Advantages’s bank accounts to receive and move RoFx customer funds, receiving bulk transfers of funds from U.S. Front Companies and sending those funds to Aware Choice, Trans-Konsalt, and Boonruk Ruamkit; and to pay Borys, Mayon Solutions Ltd, Mayon Solutions, LLC, and herself for their roles in the RoFx conspiracy. *See supra* ¶¶ 171–172, 177.
- x. Olga Abrykosova managed the flow of RoFx customer funds through the bank accounts of Notus and Global E-Advantages, sending those funds to various

other entities as directed by Alex Doe and the other RoFx Operators—including funds sent to Aware Choice, Trans-Konsalt, Boonruk, Borys, Mayon, and Alla Skala. *See supra* ¶¶ 172, 177–178.

- y. Anna Shymko formed Easy Com to provide the RoFx Operators a Front Company for creating a bank account and integrating customer funds into the financial system; and also dissolved Notus to conceal the RoFx Operators' wrongdoing. *See supra* ¶¶ 179–181.
- z. Timothy Stubbs agreed to use his authority as manager for Grovee to provide the RoFx Operators a Front Company for creating bank accounts and integrating customer funds into the financial system; Stubbs then transferred the funds as directed by the RoFx Operators. *See supra* ¶¶ 182–186.
- aa. Easy Com used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 180.
- bb. Jase Victor Davis used his access to Easy Com's bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 180.
- cc. Shopostar used its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including to Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 173–175.
- dd. Nataliya Los used her access to Shopostar and its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including to Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 173–175.
- ee. Grovee used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 183.
- ff. Jared Goodyear used its (or his) bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 187.
- gg. Trans-Konsalt used its bank accounts to receive and move RoFx customer funds, including bulk amounts from Notus, and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 190–193.
- hh. Boonruk Ruamkit used its bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including bulk amounts from U.S. Front Companies, and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 194–196.

- ii. IT Outsourcing used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 197–198.
- jj. Nattpemol Krinara created IT Outsourcing and its bank accounts to use for transferring RoFx customer funds and used her control over Boonruk and IT Outsourcing’s bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including receiving bulk amounts from U.S. Front Companies; and, ultimately, transferred those monies to the RoFx Operators themselves. *See supra* ¶¶ 194–198.
- kk. Papahratsorn Raviratporn created IT Outsourcing to use for transferring RoFx customer funds and help conceal the Money Laundering Enterprise by distributing transactions into IT Outsourcing. *See supra* ¶¶ 197–198.
- ll. Art Sea Group used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 199–201.

336. Defendants’ acts, detailed in paragraph 335, facilitated or concealed the conversion of the RoFx customers’ funds which damaged Plaintiffs and the Class for the amounts contributed to the RoFx Scheme. *See supra* ¶ 332.

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**Count VIII: Aiding and Abetting Conversion  
Against Peter Mohylny and the Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals**

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337. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252.

338. This Count is pleaded in the alternative to Count VII, *supra*, as against Peter Mohylny and the Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals.

339. Peter Mohylny and the Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals, aided the RoFx Operators to commit or conceal the conversion detailed in Count VI, *supra*, doing so knowing they were assisting the RoFx Operators to commit or conceal the conversion or, alternatively, doing so recklessly knowing the

predictable result of their actions would assist the RoFx Operators to commit or conceal the conversion.

340. Each of Peter Mohylny and the Company Organizer Defendants, Front Companies and Principals, and Layering Companies and Principals substantially assisted the RoFx Operators to commit or conceal the conversion:

- a. Peter Mohylny caused the RoFx.net to cease operating or deliberately allowed the RoFx.net domain to lapse, preventing Plaintiffs and the Class Members from accessing their RoFx.net accounts.
- b. Wealthy Developments used its bank accounts to receive and move RoFx customer funds, including paying ePayments for its role in the assisting the RoFx Operators in committing or concealing the conversion. *See supra* ¶¶ 132–136, 140.
- c. Anton Bilous used his control of Wealthy Developments and its bank accounts to receive and move RoFx customer funds, including paying ePayments for its role in the assisting the RoFx Operators in committing or concealing the conversion, and to establish a relationship with ePayments to use for the benefit of the RoFx Operators. *See supra* ¶¶ 132–136, 140.
- d. ePayments used its accounts and financial services to receive and move RoFx customer funds, concealing the illicit flow of funds to, ultimately, the RoFx Operators. *See supra* ¶¶ 133–139.
- e. Aware Choice used its bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 142–145.
- f. VDD used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators *See supra* ¶¶ 151–153.
- g. Dmytro Fokin used his control of Aware Choice and VDD’s bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; transferred these monies to, ultimately, the RoFx Operators; and ultimately dissolved Aware Choice to conceal the Money Laundering Enterprise. *See supra* ¶¶ 142–145, 151–153.
- h. Ivan Hrechaniuk used his control of Aware Choice’s bank accounts to receive and move RoFx customer funds, including receiving bulk transfers of funds from Front Companies in the United States; transferred these monies to,



ultimately, the RoFx Operators; and ultimately dissolved Aware Choice to conceal the Money Laundering Enterprise. *See supra* ¶¶ 142–145.

- i. Manuchar Daraselia used his control of VDD’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 151–153.
- j. Brass Marker used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 146–148.
- k. Sergiy Prokopenko used his control of Brass Marker’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 146–148.
- l. Profit Media used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 149–150.
- m. Auro Advantages used its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including a payment to ePayments; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 156–160.
- n. Borys Konovalenko, directly or through agents, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds; Konovalenko also directed that Notus be dissolved to help cover the financial tracks of the RoFx funds through Notus. *See supra* ¶¶ 162–181.
- o. Mayon Holding Ltd, directly or via its agent Marina Garda, wholly-controlled subsidiaries Mayon Solutions Ltd and Mayon Solutions LLC, and Konovalenko provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- p. Marina Garda, directly or through her signatory authority over Mayon Holding and, in turn, her control over subsidiaries Mayon Solutions Ltd and Mayon Solutions LLC, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- q. Mayon Solutions Ltd, directly or via Konovalenko and Director Olga Tielly, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.

- r. Olga Tielly, as Director of Mayon Solutions Ltd, executed the RoFx Services Agreement which provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- s. Mayon Solutions, LLC, directly or via Konovalenko and Manager Daria Eckert, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds; and Mayon Solutions, LLC, received some of the proceeds of the RoFx Service Agreement. *See supra* ¶¶ 162–181.
- t. Daria Eckert, as manager of Mayon Solutions, LLC, provided the RoFx Operators with Front Companies Easy Com, Notus, Shopostar, and Global E-Advantages and their bank accounts for use in collecting and moving RoFx customer funds. *See supra* ¶¶ 162–181.
- u. Notus used its bank accounts to receive and move RoFx customer funds, receiving bulk transfers of funds from U.S. Front Companies and sending those funds to Aware Choice, Trans-Konsalt, and Boonruk Ruamkit; and to pay Borys, Mayon Solutions Ltd, Mayon Solutions, LLC, and Alla Skala for their roles in assisting the RoFx Operators in committing or concealing the conversion. *See supra* ¶¶ 171–172.
- v. Global E-Advantages used its bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including sending funds to Notus and Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶ 177.
- w. Alla Skala used her access to Notus and Global E-Advantages’s bank accounts to receive and move RoFx customer funds, receiving bulk transfers of funds from U.S. Front Companies and sending those funds to Aware Choice, Trans-Konsalt, and Boonruk Ruamkit; and to pay Borys, Mayon Solutions Ltd, Mayon Solutions, LLC, and herself for their roles in assisting the RoFx Operators in committing or concealing the conversion. *See supra* ¶¶ 171–172, 177.
- x. Olga Abrykosova managed the flow of RoFx customer funds through the bank accounts of Notus and Global E-Advantages, sending those funds to various other entities as directed by Alex Doe and the other RoFx Operators—including funds sent to Aware Choice, Trans-Konsalt, Boonruk, Borys, Mayon, and Alla Skala. *See supra* ¶¶ 172, 177–178.
- y. Anna Shymko formed Easy Com to provide the RoFx Operators a Front Company for creating a bank account and integrating customer funds into the financial system; and also dissolved Notus to conceal the RoFx wrongdoing. *See supra* ¶¶ 179–181.

- z. Timothy Stubbs used his authority as manager for Grovee to provide the RoFx Operators a Front Company for creating bank accounts and integrating customer funds into the financial system; Stubbs then transferred the funds as directed by the RoFx Operators. *See supra* ¶¶ 182–186.
- aa. Easy Com used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 180.
- bb. Jase Victor Davis used his access to Easy Com’s bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 180.
- cc. Shopostar used its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including to Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 173–175.
- dd. Nataliya Los used her access to Shopostar and its bank accounts to receive and move RoFx customer funds and then transferred these monies as directed by the RoFx Operators, including to Boonruk Ruamkit; and, ultimately, to the RoFx Operators themselves. *See supra* ¶¶ 173–175.
- ee. Grovee used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 183.
- ff. Jared Goodyear used its (or his) bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶ 187.
- gg. Trans-Konsalt used its bank accounts to receive and move RoFx customer funds, including bulk amounts from Notus, and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 190–193.
- hh. Boonruk Ruamkit used its bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including bulk amounts from U.S. Front Companies, and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 194–196.
- ii. IT Outsourcing used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 197–198.
- jj. Nattpemol Krinara created IT Outsourcing and its bank accounts to use for transferring RoFx customer funds and used her control over Boonruk and IT Outsourcing’s bank accounts to receive and move RoFx customer funds as directed by the RoFx Operators, including receiving bulk amounts from U.S.

Front Companies; and, ultimately transferred those monies to the RoFx Operators themselves. *See supra* ¶¶ 194–198.

- kk. Papahratsorn Raviratporn created IT Outsourcing to use for transferring RoFx customer funds and help conceal the Money Laundering Enterprise by distributing transactions into IT Outsourcing. *See supra* ¶¶ 197–198.
- ll. Art Sea Group used its bank accounts to receive and move RoFx customer funds and then transferred these monies to, ultimately, the RoFx Operators. *See supra* ¶¶ 199–201.

341. Defendants’ acts, detailed in paragraph 340, facilitated or concealed the conversion of the RoFx customers’ funds which damaged Plaintiffs and the Class for the amounts contributed to the RoFx Scheme. *See supra* ¶ 332.

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**Count IX: Unjust Enrichment  
Against the RoFx Operators, Front Companies and Principals, and Layering Companies  
and Principals**

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342. Plaintiffs incorporate into this Count the allegations in paragraphs 1 to 252.

343. Plaintiffs and the Class conferred benefits—more than \$75 million in funds—upon the RoFx Operators, Front Companies and Principals, and Layering Companies and Principals, as identified in Part II. *See supra* ¶¶ 126–127.

344. The RoFx Operators, Front Companies and Principals, and Layering Companies and Principals voluntarily accepted and retained the funds provided by Plaintiffs and the Class, as detailed in paragraphs 131 to 207.

345. Plaintiffs and the Class conferred the benefit of their funds to be used by the RoFx Operators to engage in profitable foreign exchange trading using the illusory RoFx trading robot.

346. The RoFx Operators did no such trading.

347. In such circumstances, it would be inequitable for the RoFx Operators, Front Companies and Principals, and Layering Companies and Principals to retain the benefit of any of the funds conferred upon them by Plaintiffs and the Class.

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs on behalf of each of them and the Class pray for judgment and relief as follows:

A. Declaring that this action is properly maintainable as a class action and certifying Plaintiffs as the Class's representatives and their counsel as Class Counsel;

B. Declaring that Defendants are liable to Plaintiffs and the Class for monetary damages under the claims set forth herein;

C. Requiring Defendants pay damages for injuries sustained by Plaintiffs and the Class by reason of the acts and transactions set forth herein;

D. Awarding Plaintiffs and the Class treble damages for Defendants' violations of the RICO Act, as permitted under 18 U.S.C. 1964(c);

E. Awarding Plaintiffs punitive damages for Defendants' intentional misconduct, as permitted by applicable law;

F. Requiring Defendants to return inequitably retained consideration conferred on them by Plaintiffs and Class Members;

G. Awarding Plaintiffs and the Class pre-judgment and post-judgment interest;

H. Awarding Plaintiffs the costs of this action, including reasonable attorneys' fees;

I. Granting such other and further relief as the Court may deem just and proper.

### **JURY DEMAND**

Plaintiffs respectfully request a trial by jury on all issues so triable.

Dated: January 31, 2022.

Respectfully submitted,

**Jose A. Casal**

Jose A. Casal (Fla. Bar No. 767522)

[Jose.Casal@hklaw.com](mailto:Jose.Casal@hklaw.com)

Andrew W. Balthazor (Fla. Bar No. 1019544)

[Andrew.Balthazor@hklaw.com](mailto:Andrew.Balthazor@hklaw.com)

Sydney B. Alexander (Fla. Bar. No. 1019569)

[Sydney.Alexander@hklaw.com](mailto:Sydney.Alexander@hklaw.com)

HOLLAND & KNIGHT LLP

701 Brickell Avenue, Suite 3300

Miami, Florida 33131

Telephone: 305-374-8500

Warren E. Gluck (N.Y. Bar No. 4701421)

[Warren.Gluck@hklaw.com](mailto:Warren.Gluck@hklaw.com)

Matthew R. DiBlasi (N.Y. Bar No. 4237475)

[Matthew.DiBlasi@hklaw.com](mailto:Matthew.DiBlasi@hklaw.com)

Ruarri M. Rogan (N.Y. Bar No. 5800107)

[Ruarri.Rogan@hklaw.com](mailto:Ruarri.Rogan@hklaw.com)

HOLLAND & KNIGHT LLP

31 West 52nd Street

New York, New York 10019

*Attorneys for Plaintiffs*

# Exhibit 1 - RoFx Feature Emails



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## NEW No Lock package V2.0 is available for everyone

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Jul 27, 2021 8:53:23 AM

---

Dear Customers,

We are happy to announce that starting from July 27, 2021 you can subscribe to a NEW No Lock package V2.0 of upgraded AI-based trading platform V2.0 with average daily performance 0.97%.

Follow the link to check details and to calculate your profit:  
<https://rofx.net/for-customers/>

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44 20 3807 6029 (UK)  
+1-888-907-0714 (USA)  
+852-3001-1002 (Hong Kong)  
<https://my.rofx.net/login>





---

## NEW Profit Calculator

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Jul 9, 2020 10:05:43 AM

---

Dear Customers,

For your convenience we have developed a NEW Profit Calculator. Now you can compare profit calculations of all package types.

Follow to try <https://rofx.net/for-customers/#calc>

Be healthy and prosperous!

Kindest Regards,  
Customer Support Team  
support@rofx.net  
+44 20 3807 6029 (UK)  
+1-888-907-0714 (USA)  
+852-3001-1002 (Hong Kong)  
<https://my.rofx.net/login>



---

## Trading Days Reduction and Manual Trading Period Selection

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Feb 6, 2021 5:47:11 AM

---

Dear Customers,

We always consider your suggestions and ideas carefully. Some of the most numerous requests have always been to decrease the trading days of the packages and the possibility of manual selection of a trading period, so we labeled it as a high priority task

We are proud to announce that we decrease the trading period of ALL packages to 70 trading days starting February 5, 2021. Additionally, we make the option to select the preferable trading period available. You will be able to set it up by yourself when creating a package

We are committed to continuous improvement to provide our Customers with service that meets their expectations.

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44-20-3807-6029 (UK)  
+1 888 907 0714 (USA)  
<https://my.rofx.net/login>



---

## Trading Days Reduction

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Oct 27, 2020 6:33:54 AM

---

Dear Customers,

We are always moving towards suggestions of our Customers. The most numerous request was to decrease the trading days period of the packages. We took it into consideration as one of our primary tasks, and have been deliberately working towards it

Now, we are happy to announce the trading days reduction of ALL PACKAGES starting from October 27, 2020:

Advanced Compound Packages 120 trading days

Basic packages:

Trial 30 trading days  
Easy Start - 70 trading days  
Moneymaker - 160 trading days  
Gold - 160 trading days  
VIP 160 trading days

We apply maximum efforts to operate on the highest service level.

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44-20-3807-6029 (UK)  
+1 888 907 0714 (USA)  
+852-3001-1002 (Hong Kong)  
<https://my.rofx.net/login>



---

## Update: Trading Period of Advanced Compound Package is reduced

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Jul 23, 2020 1 13 04 AM

---

Dear Customers,

Based on thousands of your requests, we are glad to inform you that trading period of the most popular Advanced Compound Package is permanently reduced to 190 trading days.

Choose your Advanced Compound Package here [https://rofx.net/for\\_customers/](https://rofx.net/for_customers/)

Additionally, we would like to remind you that option to convert Basic package/No Lock package to Advanced Compound is available in your account. ("Manage" button in active packages menu, "Convert to ACP"). Please, note that you do not need to make a request to convert your package anymore

We strive for excellence in our service, constantly improving it as to conform to your highest standards.

Best Regards,  
Customer Support Team  
support@rofx.net  
+44 20 3807 6029 (UK)  
+1-888-907-0714 (USA)  
<https://my.rofx.net/login>



---

## VIP Conference 2022 application term extended

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Sep 3, 2021 7:08:10 AM

---

Dear Customers,

We would like to have you informed that application period for VIP Conference that will be held on January 20, 2022, in London, UK has been extended till October 1, 2021. To apply, make a request to vipconference@ ofx.net

P.S. Please, do not send request for application, if you have already applied.

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44-20-3807-6029 (UK)  
+1 888 907 0714 (USA)  
+852-3001-1002 (Hong Kong)  
<https://my.rofx.net/login>

# Exhibit 2 - Articles Promoting RoFx Features

Articles discussing ROFX generally:

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29. *ROFX EA Review (Benefits & drawbacks) - Forex EA Reviews*, <https://forex-ea-reviews.com/rofx-ea-review/>
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# Rofx.net Review – How A Robot And Its Team Made Forex Trading Easier

BUSINESS TIPS

Published on January 17, 2018

If you have been trading on Forex lately, **Rofx.net** wouldn't



be a new term for you.

Considering the risks in the investments, the trading fails to attract

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and when” is one reason many people fail to opt Forex trading. Eradicating this difficulty, Rofx gives the investors, an option to place less to no trades. Once the investor buys a package, the Rofx does the trade services, in fact. Input and research from the investor end is not even required. The idea is pretty brilliant and the number of “thank you” reviews prove the same. Leaving the money management and decision making to an automated process – Not so believable? Go on, read more.

**Decision Making In Forex Trading – A Human Error Found**

Unable to decide if they should stay longer or enter the trade at the moment when the profits fluctuate is a huge backdrop for manual trading. Most of the times, we only realize the decision was wrong. Here, the presence of an Artificial Intelligence (AI) is a blessing that helps the investor in making timely decisions. Rofx makes use of an adaptive AI that has been built keeping in mind, the lessons learned by the company itself. So, petty errors are no longer the reason for your failure in Forex trading.

**Money Management Done Well!**

The team uses the best of techniques, framed under special guidance, easing out your emotional aspect. Though this aspect is not all-in-all automated, the service provider doing the most of money management has come out well, according to the reviews.

**No Loss Or Loss Coverage?**

The thought of facing a huge loss usually haunts the investor. Only a few service providers guarantee the safety of your investment. Rofx promises no negatives in your investment and a loss coverage benefit. What is more exciting is that the company has a reserve fund to cover up rare unfortunate occurrences. However, the team seems to be confident about a no negative point.

**Easy Transactions And Profits**

Another issue a newbie might face is finding an icon to click to monitor/deposit his investment. With an easy UI, Rofx



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an average 0.38% daily profit. In addition, there are no set period or specific dates to withdraw your funds. Emergency situation? Withdraw your profit just at the very moment.

**Final Words**

Rofx has a perfect sketch to help a newcomer beat the odds and see some decent profit. With these amazing options, anyone can try their luck in Forex trading. Rofx, being an ideal solution for the traders of all levels, ultimately promises one thing - Your money is in safe hands.

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3. <https://alternativeto.net/software/rofx-net/reviews/>
4. <https://techmoran.com/rofx-net-wants-alternative-coinbase/>

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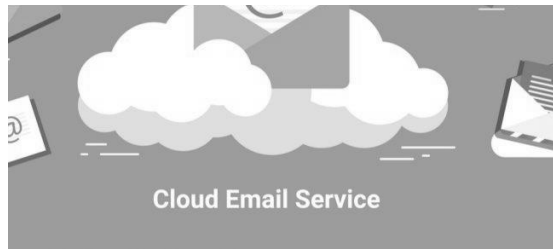
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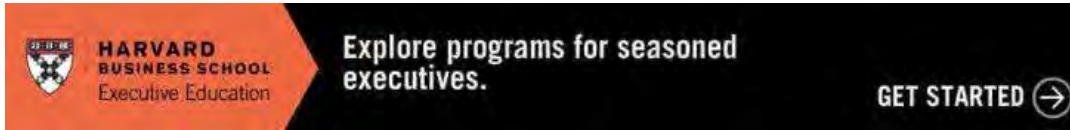
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BOSS LADY

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By *Business Woman Media* on April 6, 2018



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There's no doubt that automation is spreading and producing great results in many areas of business. And that applies equally to forex trading. Forex robots have been around for close to 13 years now. Institutional traders use advanced robots to trade billions of dollars on a daily basis. These robots come packed with speed and accuracy. For retail traders trying to trade manually, there is no way to match these speed robots.

Learning to trade forex takes many months, and even years to master. Ask any professional trader how long it takes to rise through the ranks to get to the top. Forex is not something that can be learned in a one-day seminar. Since many people do not have the time or resources to pass through such training, the only option available to them is to use a forex robot. But with the market filled with so many fake robots, it becomes a task impossible. But this is not the case anymore.



But in a market where there are so many junk products and robots that promise so much and yet deliver very little, you have to choose your service carefully. One of the best pointers to a good forex automated managed accounts service is that it is built on neural trading technology.

This means that these services, such as [Rofx.net](#), will be an automated forex managed account trading involves the replication of trades generated by an automated trading robot on forex accounts to which the robot is tied. And these services are easily differentiated from trading services that are at the very least a waste of your time and money, and can even be a scam.

### How to identify a bad service

At this juncture, it is necessary to define what constitutes a scam forex robot and what constitutes a legit one. Scam forex robots tend to have the following characteristics:

1. They are usually introduced by some “trading millionaire or guru” who supposedly made millions by trading with a secret formula that has been transformed into a trading robot.
2. You are shown boatloads of testimonials from people who have supposedly used these robots and had their finances totally transformed. If you do a thorough due diligence check, you will find out that some of these testifiers are actually paid actors.
3. The profitability claims are usually too good to be true.

Automated forex managed accounts such as [Rofx.net](#) does not possess any of the characteristics mentioned above. However, their legit status is not defined merely by the absence of these fraud characteristics. Rather, what makes them legit is the ability of the robot to deliver results that are credible and consistent, among other things.

One question that other forex robot creators hardly ever address is the issue of how any losses sustained by a forex robot are compensated for. You will be glad to know that [Rofx.net](#) gives a guarantee to cover any losses that are sustained. So traders can actually use [Rofx.net](#) risk-free.

### Checking the profitability factor

The first scam-free metric that should be sought in any forex robot should be the profitability factor. Here is a snapshot showing the annual trade results of the [Rofx.net](#) robot since 2009:

#### PROFIT BY YEAR



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As it shows, the company has been registering stellar results over time. The variance in performance is in keeping with the dynamics of the forex market where results will vary according to market conditions.

In summary, this is what you need to check with any such company:

1. It has shown a consistency in profitability over a long time.
2. Traders are insured against trade loss as a result of the Loss Coverage provided by the company's reserve fund, thus making trading with risk-free.
3. Trade results are credible and are in keeping with market patterns. Results are not a 'flash in the pan'.
4. The company has fulfilled withdrawal requests from clients for several years without fail.

Only when you have all these factors in place can you be confident of combining excellent trade results with the loss protection guarantee.



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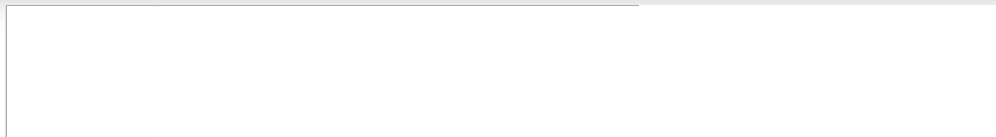
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Forex – the foreign exchange (currency or FOREX, or FX) market is the biggest and the most liquid financial market in the world. It boasts a daily volume of more than \$6.6 trillion. Trading in this market involves buying and selling world currencies, taking profit from the exchange rates difference. FX trading can yield high profits but is also a very risky endeavor.

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Forex trading bears intrinsic risks of loss. You must understand that Forex trading, while potentially profitable, can make you lose your money. Never trade with the money that you cannot afford to lose! Trading with leverage can wipe your account even faster.

CFDs are leveraged products and as such losses may be more than the initial invested capital. Trading in CFDs carry a high level of risk thus may not be appropriate for all investors.



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# AI driven Forex Trading Robot – first of its kind!

🕒 Jul 23, 2018 (<https://bigdata-madesimple.com/ai-driven-forex-trading-robot-first-kind/>) 👤 Arvind Lakshminarayanan (<https://bigdata-madesimple.com/author/arvind/>)

**A** lot of emotions come into a person's mind upon hearing the phrase 'Forex Trading.' A significant percentage of people consider it a way to get rich quickly. And an equally considerable lot consider it equivalent to gambling and a way to invite financial disasters. Whatever the case may be, everybody, at least once in their life, have tried their luck at forex trading.

So, what exactly is forex trading? It happens in the foreign exchange market, which is the virtual stage where currencies are traded. It is needless to emphasize on the importance of currencies, as the same is required to be exchanged for conducting international trade and business.

## Advantages & disadvantages of Forex Trading

Forex trading has got plentiful of advantages associated with it. The biggest one being that it offers the highest level of liquidity relative to any other financial market. However, it has got its share of disadvantages too. Since forex trading has high leverage associated with it, the loss incurred by the trader also gets exponentially increased. If a person enters into the foreign exchange

market without any prior knowledge or experience with a hope of making it big in the forex trading world, they will most likely face their worst financial nightmare.

Moreover, the forex market has a factor of extremely high volatility attached to it. Since the markets are open 24/7 and 7 days a week, a forex trader requires to be glued to their computer screens for the major part of the day in order to get hold of a profitable trading opportunity and monitor prices. This clearly indicates that a professional forex trader has to sacrifice a lot from their personal life. Including a disregard for their health. Hence, here is where forex trading robots conveniently come into play.

## What is Forex Trading robots?

The Forex trading robot is a computer program which has got a pre-defined algorithm in-built. Based on this the robot is capable to take decisions automatically, without the intervention of the trader. These decisions include whether to buy or sell a particular currency pair at any point in time. A forex trading robot can either be static or dynamic, as explained below;

**Static Forex Trading Bot:** By static, it means that the algorithm on the base of which the forex trading robot takes decisions cannot be altered or modified. Such forex trading robots serve well only till the time market conditions are not changing. We all know that forex trading market is highly unpredictable and hence static forex trading bots are of no use, absolutely.

**Dynamic or Customizable Forex Trading Bot:** As the name suggests the algorithm present in such forex trading bots can be altered, modified or completely revamped based on the market conditions. This is extremely beneficial for the forex trader as they can align the forex trading robot in accordance with the events and happenings taking place in the foreign exchange market. However, it does require the trader to have technical





## **Can a novice trader enter Forex Trading, make profits and learn simultaneously?**

So, long story short, the forex trading is not everybody's cup of tea. It requires sufficient knowledge, experience, and utmost dedication. Especially, if a person is looking to make a significant amount of profits through forex trading.

But, what if I said you could make profits from forex trading without any prior knowledge or experience? You could learn the tips and tricks of the trade by dealing directly in the market. Yes! This may sound too good to be true, but ROFX Forex Trading Platform has made this possible. By introducing the Forex AI (<https://rofx.net/>). The first of its kind forex trading robot is based on artificial intelligence and neural networks. This means that it can learn from market trends and make updates to its internal algorithms on its own. Check out the ROFX review (<https://forexrobotreview.trade/robot-review-rofx-net/>) to know more about it.

The Forex AI is a boon for novice traders who are looking to make significant profits by participating in the trade as there is, absolutely, no requirement of any kind of special knowledge, analyzing ability or experience. By employing the Forex AI robot to take trading decisions, a novice trader needn't try various strategies to reach a final strategy which works. One of the reasons the Forex AI robot will automatically synchronize its trading signals in accordance with the best current trading strategy.

## **Are there any other major benefits of using Forex AI robot by ROFX?**

One of the biggest benefits of utilizing the services of the Forex AI Trading Robot is that ROFX is the only automated forex trading platform which provides a loss coverage guarantee. The money put in by the trader is completely safe as negative results of trading, if any, are covered from the reserve fund kept by ROFX.

Moreover, if a novice trader wishes to increase his/her knowledge of forex trading, he/she can always refer the logs generated by the forex trading robot to see and analyze the actions being taken by the robot. This enables the trader to learn in real-time, directly from the main battle-field.

## Conclusion

The combination of forex trading robot, based on artificial intelligence, and the loss coverage guarantee provided by ROFX is bound to revolutionize the field of forex trading as even novice traders will be able to reap the benefits. And make a considerable amount of profits without having to lose their money.

Having a stable income is a requirement of everybody who is living on this planet. And with Forex AI robot, even novice traders can make a profit without having to actually take part in the bidding process. For those who are seeking financial independence and stability, utilizing the services of the ROFX automated trading platform with the power of artificial intelligence is the best option.



Arvind Lakshminarayanan (<https://Bigdata-Madesimple.Com/Author/Arvind/>)

Arvind is the editor-in-chief of **Big Data Made Simple** (<https://Bigdata-Madesimple.Com/>).

He is also a content specialist at **Crayon Data** (<https://www.Crayondata.Com/>).



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Really good.



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**David**

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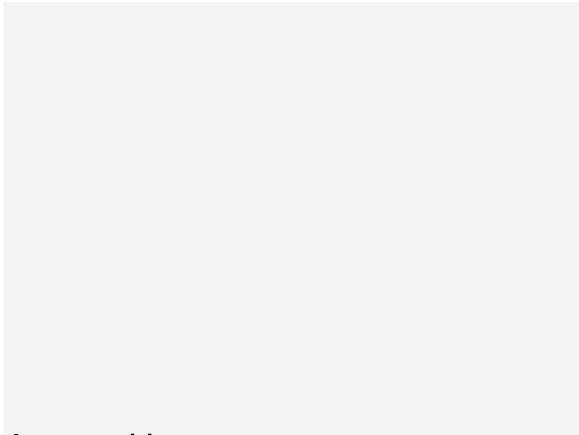
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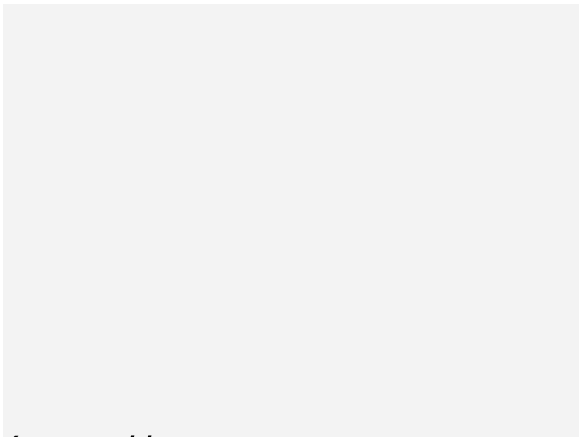
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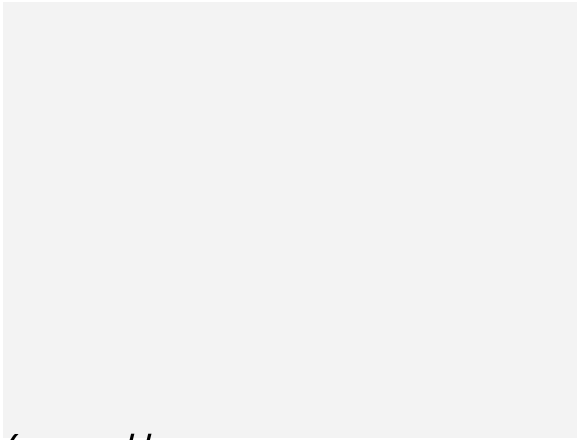
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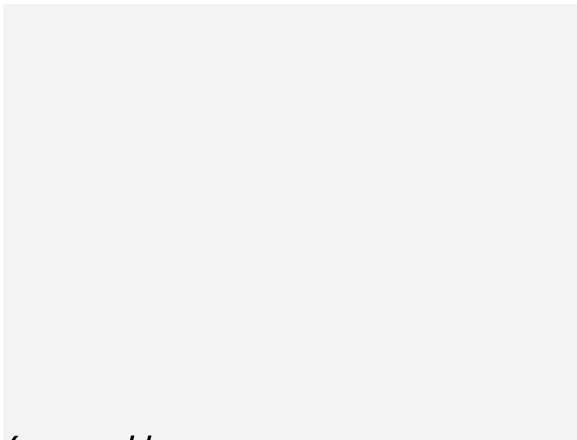
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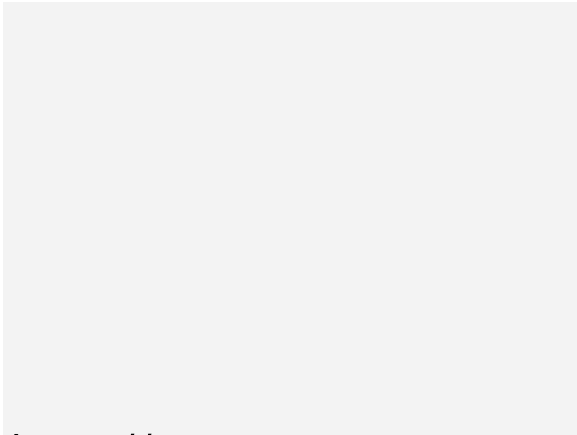
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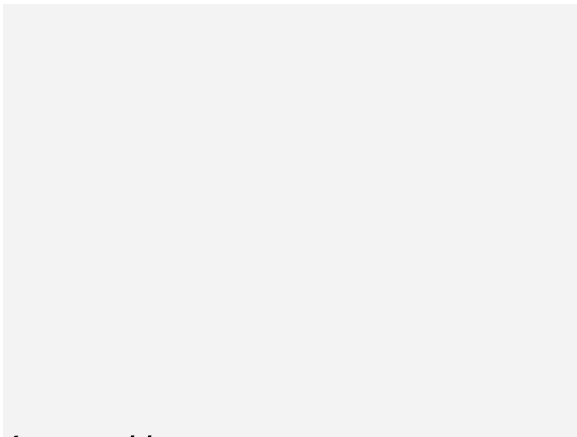
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Business Ideas

# Which is the Best Forex Automated Trading Robot?



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Automated forex trading robots have flooded the market. While forex robots were truly meant to assist a trader in the time period when traders couldn't keep track of the forex market, individuals have started to rely entirely on the forex robots. Each day a new forex robot enters

in forex trade which claims to be much better than its counterparts in the relative market.



## 5 Cheap Stocks to Buy ASAP

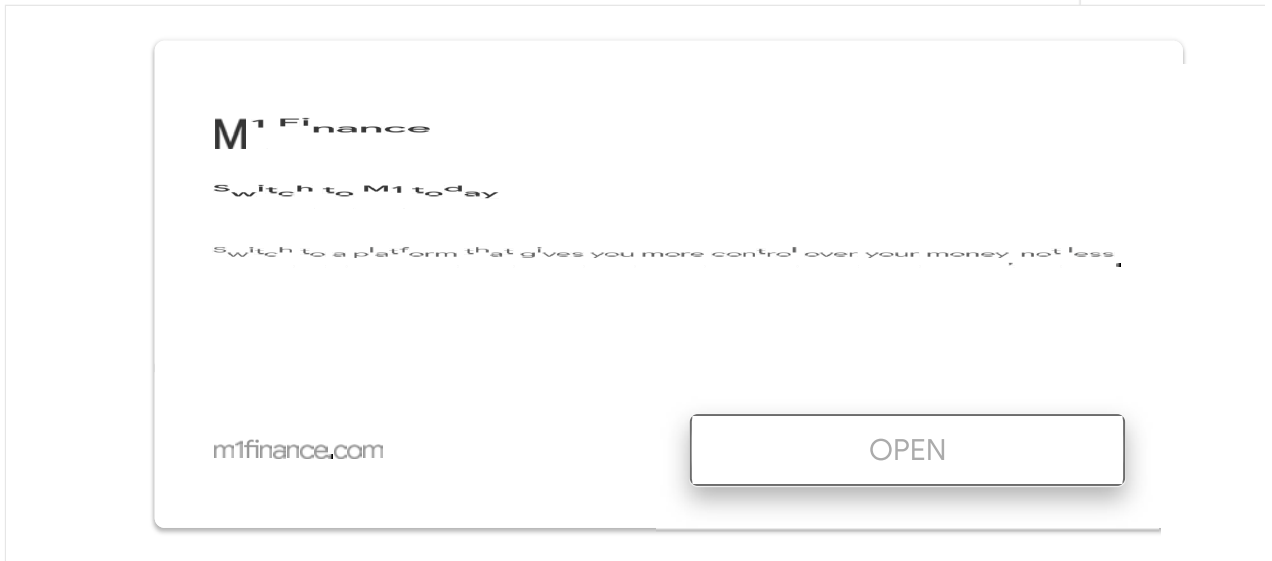
First of all, before using a forex trading robot, one must remember that trading robots are not developed with the purpose of being a full-time replacement for the trader. Most of the forex robots work on a single trading strategy which is coded by their developer and thus they become utterly useless in changing market conditions. Forex market runs 24/7 and is never static. Taking all of this into account, there is one automated trading robot ROFX, best forex robot which



stands tall in the forex trade market in the automated forex trade segment.

## Why ROFX deserves the tag of being the Best Forex Robot?

ROFX automated forex trading robot is superior among all forex trading robots and the following points stand witness to this statement.



### Based on Artificial Intelligence

ROFX is the only automated forex trading robot in the market which is based on Artificial Intelligence. This means that neither the algorithm in the robot is static nor the trader needs to put hard endeavors to code the same in accordance with market conditions. The robot, thanks to AI, learn itself from the changing market conditions and evolves accordingly. Artificial Intelligence makes the robot completely capable of monitoring the market conditions and take trading actions in accordance with them.

Read Also: [3 Steps to Make Money in Forex online](#)

- **Loss Coverage Guarantee**

With ROFX on your side be sure that you are never going to experience any loss. ROFX Company provides a loss-coverage guarantee stating that all losses will be covered up by their Reserve Funds. Now that is what we call confidence of a company in their product. This confidence is entirely absent from all other forex automated trading robot developers.

- **Generates Trading Reports**

A beginner in the forex trade market has a lot to learn. Here also, ROFX automated forex trading robot comes in handy. ROFX forex trading robot is capable of generating reports highlighting the market conditions and the associated trading action taken in the scenario. This way ROFX automated forex trading robot generates a lot of real-time learning material through which a beginner forex trader can enhance his/her knowledge in the forex trading market.

Read Also: [Top 10 Risky Investments You Should be Careful about or Avoid In Nigeria](#)

## **Unusual Options Activity**

InsiderFinance.io

## Conclusion

Well! We guess that the above three points are enough to explain you as to why ROFX is considered to be the best automated forex trading robot in the relative market. However, it is mandatory to reiterate over here what we said in the beginning that automated forex trading robots must never be considered and utilized as a complete replacement for a human trader. Hence, choose a forex robot wisely to turn the tides of the forex market in your favor.

## Refinance Calculator

JANUARY 10, 2022

Loan amount   
\$


30-yr fixed  15-yr fixed  5/1 ARM

2.57% APR  2.03% APR

Calculate Payment

Terms & Conditions apply. NMLS#

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## The 2018 World's Best Forex Robot



Wilmington, DE -- (ReleaseWire) -- 02/05/2019 --The RoFx company has been proclaimed the Winner for the most successful trading performance on the Forex market, totaling in the amount of 93%.

Owing to the recent company's progress, the RoFx.net, the owners of the Artificial Intelligence and Neural network, tops the list of other Forex trading platforms due to its impeccable trading approach and considerably swift advancement on the financial market.

The company has been operating since 2009, and over the past 9 years its reputation has won worldwide recognition among customers who are building their financial freedom with the RoFx.

In 2018 the AI soft has demonstrated its innovative upgraded technology on practice, reaching 93% as the trading progress, and therefore attracted attention of both novice and professional traders.

The 2018 Best RoFx Robot intends to preserve the trust of its customers by delivering the best service and encourages all traders from different parts of the world to join the partnership with RoFx.

Forex Robot Review  
forexrobotreview.trade

<b>Media Relations Contact</b>
Stephen Irish The 2018 World's Best Forex Robot  Email   Web   Profile
<b>Follow ForexRobotReview</b>

Source: **ForexRobotReview**  
Posted Tuesday, February 05, 2019 at 11:55 AM CST - [Permalink](#)

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# Forex Robot Reviews ROFX.net SCAM or NOT?

By **Staff Writer** - Feb 26, 2019

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Forex trading has been there for quite a few years now. Advancements have always been the dream of man to make life much easier for them, hence the development of Forex trading robots.

These robots have also been around for close to a decade now, with more sophistication and efficiency added as time goes by. Whenever a big trading robot hits the market, everyone will want to know whether it is a scam or not.

You can't blame anyone as there are actually so many Forex trading robots currently which are not so much legit.

In this article, we will take you through [ROFX.net](#) after which we will give you our verdict on the Forex website. The article will also help you to identify whether this Forex robot is a scam or not.



## How does the ROFX.net trading robot work?

The ROFX robot analyses the market using preset complex algorithms and is used to make timely decisions which are more geared towards making more profit and minimizing risks and losses. Since everything is automated, even novices can also make profit from trading as all they need is an account and the robots will take care of the rest.

## Why ROFX.net is worth it

ROFX.net has had a consistent profit margin ever since 2009 without recording any serious losses. With an average daily profit margin of about 0.38%, this can be projected to give an annual profit of 95%. Unlike any other robot systems, there is a guarantee of security of the initial deposit.

This means that should there be a day where losses are made, they are covered by the Reserve Fund. This is a great advantage to the trader as you will be able to minimize risks and just letting your money do the work for you without having to keep an eye on it 24/7.



Having looked at several reviews on ROFX and having tried it ourselves, we can boldly say that the robot is doing its work as it should – thanks to the numerous positive reviews and almost no negative ones.

The robots have been designed with the latest technology which is able to make trading decisions regarding the latest market trends.

## How to identify fake Forex trading robots

Advancements in technology don't only mean well, they can be used for bad things too. There are various ways people can con traders and usually end up stealing their money or being arrested by the authorities.

Some developers of these robots might usually just be people who have some knowledge on trading and will want to mint some quick bucks from unsuspecting traders. A Forex trading robot is only as good as its developer, so if the developer is not much qualified, the robot might incur some losses.

These robots are also susceptible to scams and other forms of attack if you do not get them from trusted companies such as ROFX.net. So how will you know the trading robot is a scam? Take a look at these points:



- Fake Forex trading robots will only offer back tests as proof of how profitable they are. This is because it is easy to optimize the settings of the trading robot to suit the available data only. Backtests are not a reflection of what the current market holds hence isn't a clear indication of how profitable the robots will be.
- Fake trading robot companies will feed you demo account statements. Always insist on live trading statements as they give a more clear indication of whether the robot is as efficient as it deems to be. You can use [myfxbook](#) [ROFX](#) to check and confirm whether the robot delivers or not.
- the RoFx robot is one of the robots having PAMM package which enables investor to choose any trading broker for funds transferring, thus the RoFx robot doesn't have access to it. For more detailed information visit Investopedia:  
<https://www.investopedia.com/articles/forex/010715/how-forex-pamm-accounts-work.asp>
- Moreover, the RoFx robot covers incurred losses by the Reserve Fund.

## Conclusion

In as much as trading doesn't always guarantee wins, at least go for those sites such as ROFX.net which assure you profits, regardless of how small they are, and minimize the risks and losses.

Thus, after reading the article, you see why you should embrace Rofx.net as a legit software, and run away from most of the fakes you will see online. From the emerged facts, it is safe to say that the RoFx is the most credible way for investing and safeguarding of your funds.

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Home

## WHAT IS THE AUTOMATED TRADING ROBOT ROFX?

2019.07.18 07:09

forex trading has been around for years now.

progress has always been humanity's dream of making people's lives easier, and therefore exchange trading robots have been developed.

these robots have also existed for nearly a decade and are becoming more advanced and efficient over time.

every time a large trading robot comes to the market, everyone will want to know if it is a scam.

Currently, there are so many Forex trading robots that can't be said to be real that you can't blame anyone.

IN THIS ARTICLE, WE WILL INTRODUCE ROFX AND TELL YOU THE EVALUATION ON THE WEBSITE.



## RoFX's innovative features

According to RoFX developers, the system features some of the most advanced trading tools on the market.

Unlike most other semi-automated trading systems, RoFX is fully autonomous and operates all day to ensure investors get the most out of different forex markets.

this is made possible by machine learning and artificial intelligence algorithms embedded in the root directory of the system.

they allow you to conduct independent market research, analyze current events, predict market impact, and make informed trade adjustments.

interestingly, these transactions are executed from the company's servers, so you don't have to download and configure complex trading tools.

## Advantages of RoFX

investors don't need past trading experience

One of the main strengths of the RoFX.net is that transactions are analyzed and executed from within the company's servers.

したがって、投資家は、異なるデスクトップおよびスマートフォンのアプリケーションをダウンロードすることに伴う面倒や、複雑な構成および取引実行プロセスについて心配する必要はない。

理想的には、トレーダーはサーバ上にホストされている外国為替取引会社に仮想口座を開設するだけでよく、顧客はこれを使って、希望するパッケージに応じた資金を預けたり、得た利益を引き出したりすることができる。

口座の作成、預金、引き出し、および取引の実行が単純であるため、投資家側の事前の取引経験は必要ありません。

## 完全自動取引

為替取引はどのように行われますか?従来、経験豊富なアナリストやマーケット・リーダーは、将来のトレードを予測するために、ほとんどの時間を過去のデータの分析と業界の現在の出来事との比較に費やしていました。

機械学習や人工知能を駆使したトレーディング・アルゴリズムが出現したとしても、ほとんどの企業は、アナリストにトレードを検討させてから、それを購読者に送るよう主張しています。

RoFX.netシステムは、取引プロセスを完全に自動化することによって分析をバイパスし同社のアルゴリズムは、業界内の出来事を監視、それを使って情報に基づいた取引決定をリアルタイムで行い、実行することで取引システム全体を監視しています。

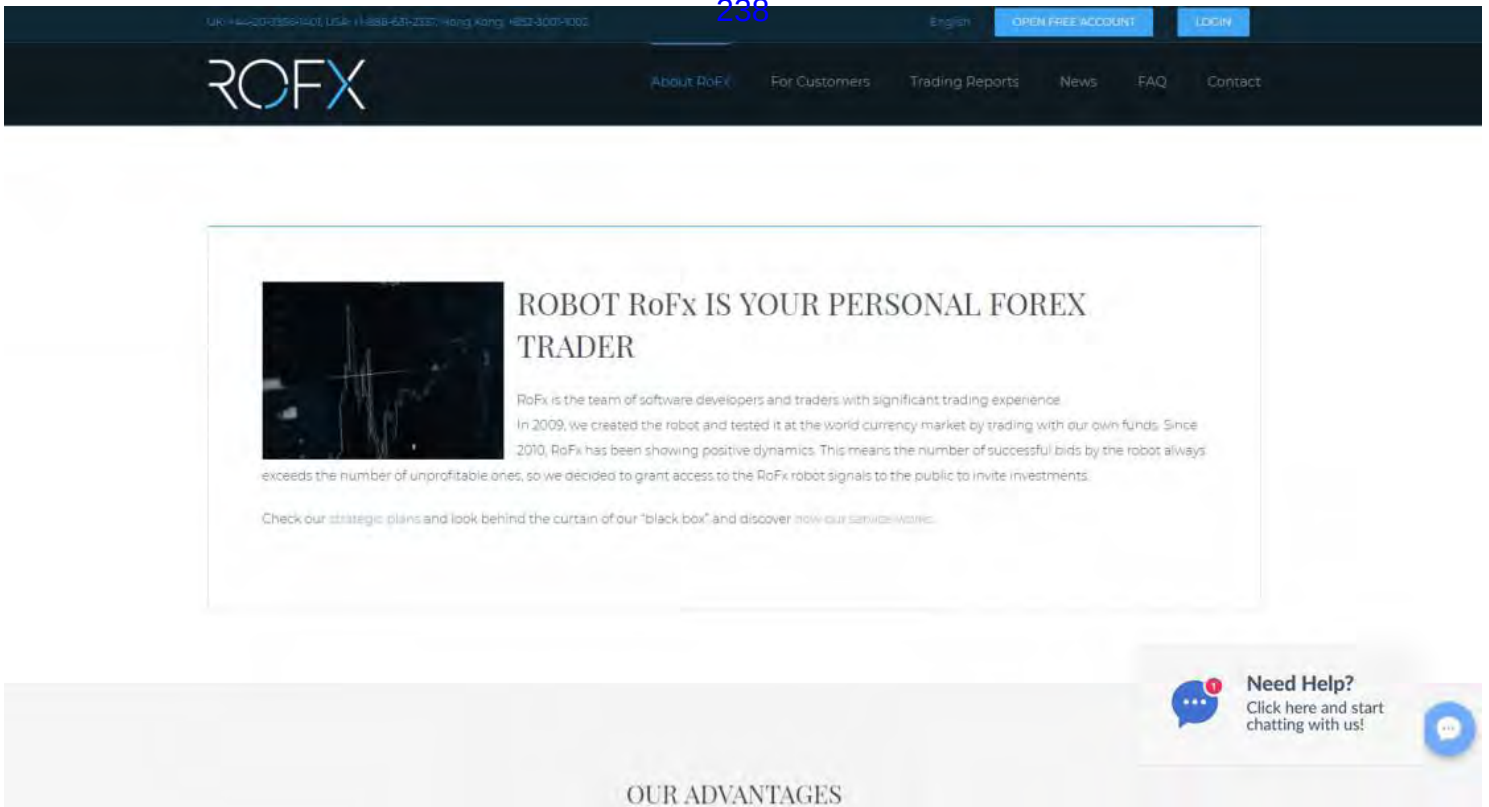
## 高い収益性と無料引き出し

RoFX取引プラットフォームは、AIトレーダーのパフォーマンスの日次、週次、月次、年次の記録を保持しています。

この詳細な履歴トレーディング・データは、自動化システムが一貫して高いROIを示しており、日次および月次の収益率はそれぞれ平均0.25~0.38%および8~10%であることを示しています。

さらに、外為取引会社はプラットフォームで得た利益に引き出し手数料を課さず、パッケージに関係なく銀行手数料を負担します。





## 短所

### 比較的高価

平均的なブローカーはおそらく **RoFX.net** での取引は特に彼らの異なる投資パッケージを考えるとかなり高価になるでしょう。

最小限の預金を可能にする伝統的な外国為替取引サイトとは異なり、**RoFX.net** はトレーダーが選択しなければならない5つの異なる投資カテゴリーを持っています。

ほとんどの投資家は比較的高価だと考えているかもしれません。

## 最終的な評価

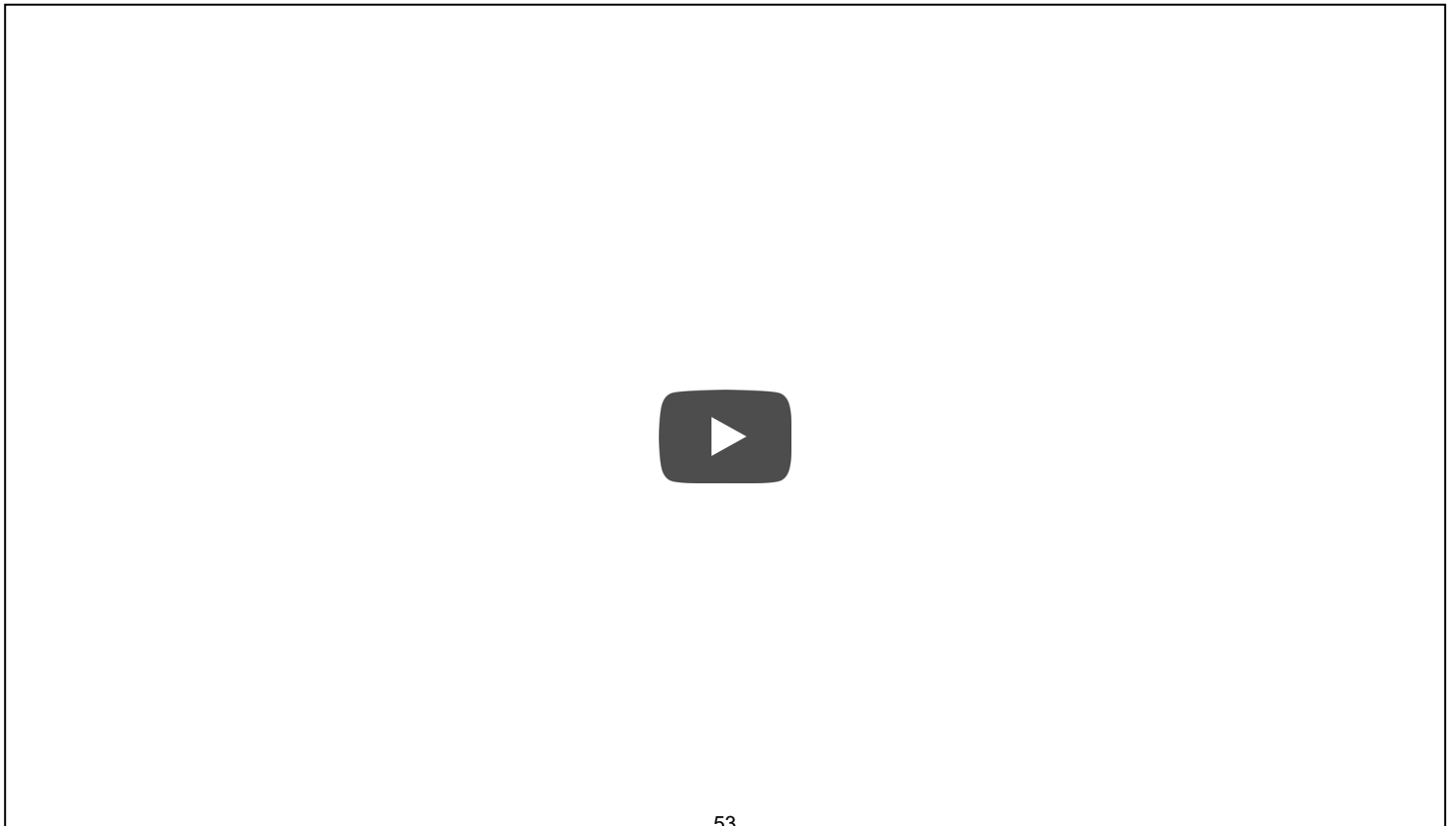
**RoFX** は理想的な為替取引会社のほとんどの機能を備えています。

主な強みとしては、取引の経験がなくてもコントロールできる簡単なインターフェイス、プラットフォーム上でのビットコイン取引の採用、完全自動化を実現する **AI** と機械学習機能の導入、引き出し手数料などの不要な請求を受けない魅力的な利益率などがある。

このシステムは、自動化の力を最大限に活用している数少ないシステムの1つであるため、業界での経験に関係なく、すべてのトレーダーにとって貴重なツールとなっています。

外国為替市場への参入や投資ポートフォリオの多様化をお考えの方には、ぜひお勧めしたいと思います。

↓画像をクリックで公式サイトへ





755



自動売買サイトRoFXまとめ

+ フォロー

0コメント

コメントする...



自動売買サイトRoFXまとめ

+ フォロー

## 記事一覧

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HOME > OVERSEAS EA REVIEW AND VERIFICATION > RoFX (RoFX.net) >

## Complete illustration commentary from registration of RoFX to start operation! We will introduce how to add deposits, rate plans, and packages in an easy-to-understand manner

© july 25, 2019



"RoFX" is a forex trading robot that is perfect for the word "low risk middle return" (as you can see from the graph below).



the average monthly interest rate was 8.25% at the posting stage. it is characterized by an astonishing operating result of 158% (and 0.35% drawdown) in terms of annual interest rate.

In addition, "RoFX" is not an EA, so there is no need to download and set MT4, and there is no need to customize it by manipulating parameters.

"RoFX" was the perfect management method for Zubora humans like managers because they literally operated with "put money in and leave".

So, I am a manager who uses the acclaimed "RoFX", but it is not a normal overseas EA, so I was often puzzled from registration to start operation.

So on this page, you can see roFX

- how to register
- how to deposit
- rate plan
- how to get started

we will explain in detail in japanese and illustrations about the four points, so i would appreciate it if you could refer to the operation.

 **table of** contents [ [display](#) ]

---

## How to register RoFX



In order to start operating RoFX, let's register as a member of RoFX first.

### 1. Go to RoFX official website

---



- [Click here to go to roFX's official website](#)

! | there seems to be a dummy site. be sure to go to the link above to access the official website.



## 2. Register with RoFX

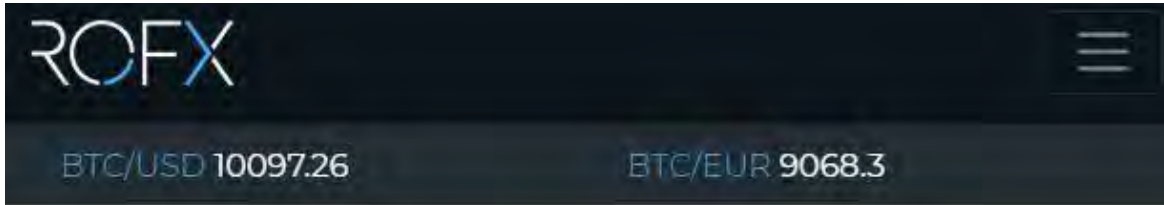
---

The image shows a registration form on a dark background. It contains five input fields: 'First name' with placeholder 'Enter your first name', 'Last name' with placeholder 'Enter your last name', 'Email' with placeholder 'Enter your email', 'Country' with placeholder 'Select country' and a dropdown arrow, and 'Phone' with placeholder 'Enter your phone number'. Below the fields is a note: 'Please enter valid phone number because password to your account will be sent on it'. At the bottom is a blue button labeled 'REGISTER FREE ACCOUNT'.

- **First name**  
Enter the name in Romaji (e.g. TARO)
- **Last name**  
Enter your last name in Romaji (e.g. YAMADA)
- **Email**  
Fill in your computer email address. Free email addresses such as Gmail are also acceptable
- **Select Country**  
Japan
- **Phone**  
Country code +81, pull out 0 on the head and fill in the smartphone phone number (e.g. 09012345678 ⇒ +819012345678)

### 3. Log in to RoFX

---



## Login to your RoFx account

A screenshot of the login form on the RoFX website. The form is set against a dark background. It features two white input fields. The first is labeled 'Login:' and contains the placeholder text 'Enter email or phone'. The second is labeled 'Password:' and contains the placeholder text 'Enter password'. Below these fields is a prominent blue button with the word 'LOGIN' in white capital letters.

- Login  
Enter your registered email address
- Password  
Fill in the "4-digit number" received by SMS on the registered phone number

Once you have logged in, you are done registering RoFX. Next, let's know RoFX's "rate plan".

» [RoFX Official Site](#) >



## RoFXの入金方法と料金プランを理解しよう



次に確認しておきたいのが「RoFX」の入金方法と料金プランです。

### RoFXの入金方法

---

RoFXには3つの入金方法があります。

#### 📌 3つの入金方法



1. クレジットカード
2. ビットコイン【オススメ】
3. 国際送金【非推奨】

### RoFXの料金プラン

---

RoFXは海外EAのような買い切り型ではありません。

「利益に対して〇%の手数料（パフォーマンス手数料）」という形で料金が発生し、入金方法・入金金額によって以下のように料金プランが異なります。

#### USD・EUR運用の料金プラン

料金プラン	預入額	取引期間	自分の取り分	RoFXの取り分
NO LOCK-NO LIMIT	1,000～UNLIMITED	無期限	40%	60%
Trial	1,000～5,000	30日間	40%	60%
Easy start	5,000～10,000	70日間	50%	50%
Moneymaker	10,000～50,000	270日間	65%	35%
Gold	50,000～100,000	270日間	75%	25%

VIP	100,000～ UNLIMITED	270日間	85%	15%
-----	-----------------------	-------	-----	-----

## BTC運用の料金プラン

料金プラン	預入額	取引期間	自分の取り分	RoFXの取り分
NO LOCK-NO LIMIT	0.05～UNLIMITED	無期限	40%	60%
Trial	0.05～0.25	30日間	40%	60%
Easy start	0.25～0.50	70日間	50%	50%
Moneymaker	0.50～2.50	270日間	65%	35%
Gold	2.50～5	270日間	75%	25%
VIP	5～UNLIMITED	270日間	85%	15%

## オススメのプランはTrial⇒Moneymaker以上

表を見ていただくと分かるように、基本的には預入額が大きくなればなるほどパフォーマンス手数料が低くなり、私たちユーザーの取り分が多くなる（＝お得になる）のがRoFXの料金プランの特徴です。

オススメは、まずは30日間の「Trial」運用をすることです。

その運用結果に納得できたら、手数料が安くなる「Moneymaker」以上のプランに加入するのがオススメです。

## RoFXに入金しよう



それではさっそく、RoFXに入金していきましょう！

## RoFXのビットコイン入金方法

step

1



## Bitcoin > 入金数量設定

Select payment method:

CREDIT CARD      BANK TRANSFER      BITCOIN

Amount in BTC:

0.25

FUND ACCOUNT

- Select payment method  
「BITCOIN」を選択します
- Amount in BTC  
入金したいビットコイン数量を設定します
- 「FUND ACCOUNT」をクリックします

step

2



## ビットコインアドレスをコピー

¥ 9088.44

Amount: 0.25000000 BTC



17E...nCd4vF

OPEN IN WALLET

Once your RoFx Operating Account is funded, go to Account Mani section and invest money in the investment packages you wish.

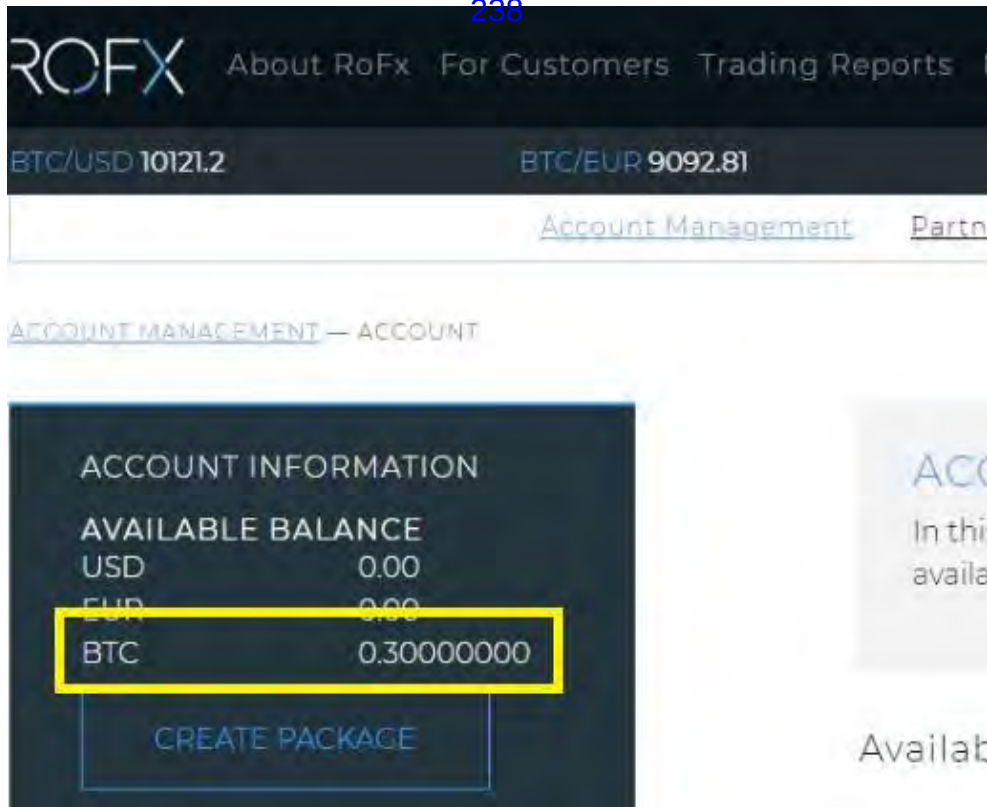
- 表示されたビットコインアドレスをコピーします

step

3



入金完了



- 1認証（=約10分）ほどでRoFXのAccountInformationに残高が反映されます。

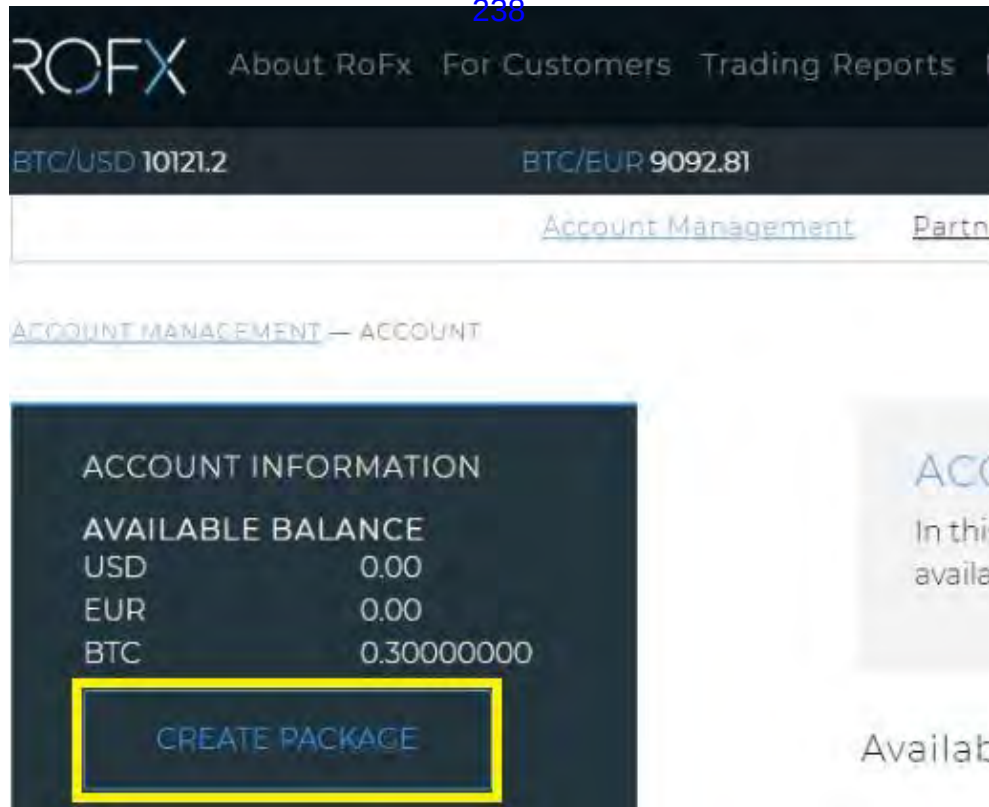
## RoFXを有効化して運用を開始しよう



最後に、RoFXを有効化して運用を開始していきましょう！

### 1. CREATE PACKAGEをクリックする

---



- CREATE PACKAGEをクリックします



## 2. 運用通貨・運用金額の設定

---

## CREATE PACKAGE

In order to create a package select a currency and enter the amount.  
Your Operating Account should be already funded in [Manage Account](#).

Select available balance:

BTC

Amount:

0.30000000

CREATE PACKAGE

- **Select available balance**  
運用通貨を設定します
- **Amount**  
運用金額を設定します
- 「**CREATE PACKAGE**」をクリックします



### 3. RoFX運用開始

---

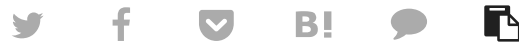
## ACCOUNT MANAGEMENT

In this section you may view the detailed statistics of your account, available packages, and the list of your active and expired packages.

### Active Packages

Package	Amount	Creation Date	Trading Days Left
Easy start	BTC:0.30000000	Jul 25, 2019	70

- Active Packagesに表示されたら運用開始です。お疲れさまでした！
- [RoFX公式サイト](#)



[RoFX \(RoFX.net\)](#)

### comment

メールアドレスが公開されることはありません。 \*が付いている欄は必須項目です

名前 \*



メールアドレス \*

サイト

## 関連記事

---

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## The Best Forex Bots For 2020 Trading

January 2, 2020

Forex expert advisors, or forex bots, are a groundbreaking development in the world of [forex trading](#). Besides saving traders time and effort while trading, forex bots have enabled novice traders to participate in the foreign exchange market.

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Forex expert advisors are computer-based tools that enable traders in the forex market to automate trading activities. Notably, all of these bots function on MetaTrader and other trading platforms like [10investing](#). These bots leverage [complex algorithms](#) to track and analyze trade positions. In particular, the forex bots conduct a thorough analysis of the market after which they open or exit trade positions. Ultimately, the point is to ensure that every action and decision that the forex expert advisor takes results in profit for the trader.

Ideally, forex robots enable traders to achieve profits easier than they would without them. The primary function of a forex bot, therefore, is to initiate and to close trades in a way that the trader will earn a positive return.

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In compiling a list of the best forex bots as we head into 2020, we considered a number of properties. First, a good bot has reliable execution speeds to avoid missed opportunities and maximize returns. Secondly, the best bot can handle several currency pairs to capitalize on favorable movements. Third, best bots are secure, guaranteeing the safety of the users' accounts. Other properties that we considered include trade accuracy and general reliability.

Below are arguably the best forex bots heading into 2020.

### RoFX: Forex Finest

The forex market is full of swindlers and finding a genuine service is not easy. However, a [detailed RoFX review](#) tells you that you can never go wrong with this forex robot. RoFX performs better than expert traders do. As such, you are assured of a comfortable margin, whether you are a newbie or an expert.

Additionally, RoFX stands out as one of the leaders in terms of automating trades. This bot is the brainchild of experienced software developers and traders. The forex expert uses artificial intelligence to study and analyze the forex market to provide reliable trading opportunities.

The use of artificial intelligence allows the forex robot to execute trades automatically.

This expert advisor also uses neural networks to execute trades profitably and ensure continuous improvement. A user-friendly interface means anyone, even those with limited trading experience, can leverage RoFX to generate consistent profits.

### Learn2trade

With Learn2Trade, a trader is likely to experience up to a 93% success rate in terms of consistently profitable trading. Just like RoFX, Learn2Trade is reliable, providing forex signals. In addition, the bot comes with trading courses through which traders can hone their individual skills.

Similar to RoFX, Learn2Trade communicates with the trader via Telegram, providing signals and any other information that might be of relevance. Further, you have the option of getting your money back if the system fails to live up to your expectations in 30 days.

## BinBotPro

BinBotPro is an automated FX trading system that leverages artificial intelligence to offer signals to forex traders. In addition to signals, the bot analyzes the market, offers insights from extensive market research and uses insights to anticipate price movements in the market.

This bot performs similar functions to RoFX, like determining when to enter and exit trade positions. Further, BinBotPro makes it easy for traders to earn profits from binary options. Like RoFX, BinBotPro enables traders to earn close to 200% in returns from their investments.

## Odin Forex Robot

This bot ranks among the best. Odin Forex robot leverages a trading strategy including *take profit* and a *tight stop* loss. This achieves two objectives. First, the user earns profit from every trade, no matter the size. Second, the trader's account remains safe from a margin call.

Additionally, Odin protects traders' accounts from snooping activities by forex traders. Particularly, forex brokers cannot hunt the stop levels of the user's account to undermine the trade position. Similar to RoFX, the bot supports more than 22 currency pairs.

## FXSignals

When it comes to accurate market analysis and credible signals, FXSignals and RoFX are your go-to systems. Interestingly, traders can leverage signals from the bot whether they are trading automatically or manually.

Due to the accuracy of the signals the bot provides, traders can enter or exit positions without suffering losses. This is especially helpful in a fast-moving market. Additionally, this tool leverages stop loss and other mechanisms to ensure that the trade's exposure to risk is at the bare minimum.

Photo by [Burak K](#) from [Pexels](#)

Most importantly, FXSignals is easy to use. Together with RoFX, the bot tops the market as the best choice for traders whose knowledge of the forex market is scant.

## Vader Forex Robot

This forex robot comes loaded with more than 30 features through which users can generate numerous trading strategies. In addition, Vader utilizes the Gryphon Trading Engine to enhance the profit margin that one earns from a successful trade.

Further, users can leverage the Fibonacci strategy to time the market in the most accurate way. With this bot, users have access to more than 20 currency pairs.

## Big Breakout EA

All trading bots discussed above leverage complex algorithms, but not the way Big Breakout EA does. Unlike the other bots, Big Breakout EA utilizes an algorithm that is dynamic. It adapts to the different movements within the market.

Similar to RoFX, Big Breakout EA is ideal for close monitoring of the market. It tracks the resistance and support levels of the particular currency pairs. Therefore, it can initiate or close trade positions in the most profitable manner.

Additionally, this trading bot follows a tight stop loss tradition such that the chances of a margin call are almost insignificant. To ensure that the user maximizes profits, the bot uses a trailing stop-loss order. It offers support to multiple currency pairs and works with all lot sizes.

So, there you have it. These top-functioning forex bots are available for your market trading needs. Use them to their fullest and your market returns are sure to benefit.

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Money

# The top forex robots for 2020

January 27, 2020 Dominic Lill automation, Forex, robot, robots, Trading, trading software

*2019 has been a breakout year for successful forex robots, as a multitude of traders has amassed fortunes using them.*

As we enter in 2020, the demand for automated trading software, like forex robots has increased. It's thus a good idea to take a look at [top forex robot reviews](#), as it would help traders make better-informed decisions when it comes to selecting an appropriate automated trading software.



Forex robots can be best described as automated trading software, executing trades on behalf of the trader, based on some predefined trading rules selected by the trader him/herself. It takes the help of trading signals and trading algorithms to complete this process. Forex robots have always been preferred by traders for their profit potential.

The following article aims to highlight five of the most profitable forex robots in existence today from [reputed and legitimate developers](#).

- 1000pipClimberSystem.com:** 1000pip Climber is one of the most advanced trading systems available to retail traders. It is a top pick for many traders thanks to its strong performance and very easy user interface. Central to the system's success is the state of the art algorithm that generates Forex signals. The algorithm continuously analysis live price data and aims to identify only the highest probability price movements. The system provides everything that a trader needs; entry price, stop loss and take profit. Another unique benefit of the 1000pip Climber System is that the system comes with full client support so you can contact the development team if you have any questions.
- ROFX.net:** Forex Robotron is a well-known forex robot that focuses more on providing a user-friendly experience. The platform is capable of conducting independent market research by analysing current events, predict their impact and make trade adjustments accordingly. Some of the useful features it has included a 24/7 dedicated support team, user-friendly interface and an auto-trading script. As noticed in the [latest RoFX review](#) it also accepts payment in various methods like direct PayPal, direct bank transfers and even in Bitcoin.
- Forex Robotron:** The Robotron platform is another forex robot developed and tested using real variable spreads, real tick data and real slippage from Dukascopy with proven live results. It works with

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anticipates a change in the market direction and gets out of the trade in advance. With a reliable strategy and user-friendly interface, Robotron can go on consecutive winning streaks of more than 80 trades.

4. **Econ Power Trader:** Econ Power Trader is another reliable forex trading robot, developed by LeapFx. It offers compatibility with MetaTrader 4 and works well with brokers who offer the lowest possible spreads and slippage. It uses AINTT (Adaptive Intelligent News Trading Technology) along with a tight stop loss. It makes a greater amount of pips from winning trades which gives it a favourable risk to reward ratio. It is thus called a news straddle trader, as it strategically identifies important news that could affect the forex market and acts accordingly.
5. **Securza Forex Robot:** The Securza Forex Robot is one of the best available options for novice traders entering the market. Setup can be done easily within 5 minutes. It supports multiple currency pairs including EUR/USD and GBP/USD. An average trade normally lasts around 6 hours with an impressive win rate of more than 50%. The developer team also provides free updates with a money-back guarantee scheme in place.
6. **Finwe Forex Robot:** The Finwe Forex Robot offers a high win rate of around 70% with a risk to reward ratio of almost 1:1. It works with both the GBP/USD and EUR/USD currency pairs, executing almost 15 trades on a daily basis. Verified tests on FXBlue indicate that it has amassed over 200% in trading gains with a monthly gain of 50% on an average. It works best with an ECN account.

## Why is it important to conduct a forex robot comparison?

Forex Robots are usually based on automatic mathematical algorithms along with trading strategies. The increased demand of forex robots has also attracted many illegitimate companies to set up Ponzi schemes masquerading as forex robots. This poses an obstacle for selecting a good forex robot for a memorable [trading experience](#).

Often, fraudulent companies set up promising looking websites with flashy images and great offers that make them hard to resist for a novice trader. Some of the claims are even backed up by unverified back-testing information which gives the impression that the past customers have got more than their money's worth. Oftentimes these are just Ponzi schemes aimed at unsuspecting traders and this is how many people have lost their hard earned money.

Thus, for [novice traders](#), it is always a good idea to conduct proper research before making any final decision based on some flashy advertisements or promises of fortune. Do not miss out on checking testimonials or reviews of those who have already used the robot. There are several authoritative sites that provide detailed reviews on the various forex robots available.

## Conclusion

Forex robots from reliable developers and companies can change the fortune of any trader struggling to turn a profit. The above list of forex robots is just some of the most well-known and efficient forex robots in existence in the market today.

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# Best Forex Expert advisors to Use for Beginners

FEBRUARY 11, 2020 BY [SUSAN PAIGE](#) — [LEAVE A COMMENT](#)

The modern Forex market is considered as a land of opportunity for traders if they play their cards right. The introduction of fx expert advisors in the market has seen a massive influx of small to medium scale traders from around the world. Beginners need to be careful and consider some of the [top forex robots list](#) which will help them make informed decisions.

In layman's terms, Forex robots refer to specific automated trading software that generates trading signals and executes trades on the trader's behalf. Because of the expansion of internet connectivity, forex trading is now more accessible than ever. Forex Robots are a preference for many novice traders for their profit generation potential.

As the market is filled with Forex robots from various developers and firms, selecting one becomes quite complicated. So, here is a brief comparison of the best forex robots are mentioned in brief below.

**1. ROFX:** ROFX is a simple to use, AI-powered forex robot, which does not require any additional download. This robot presents some of the most useful features available such as Payment flexibility

which includes Bitcoin support alongside the normal EUR and USD. Other features include a money back guarantee plan, as well as guaranteed complete coverage for losses. This is because the company has reserve funds which cover negative trades and losses. Taking a look at some of the [ROFX reviews available online](#) prove that ROFX has a very satisfactory track record.

**2. Forex Diamond:** Forex Diamond is a highly sophisticated Forex robot, developed by the Technocrats.

Some of the standout features in Forex Diamond include:

- Automation: Forex diamond provides automation, something which lets traders automatically identify trading opportunities by continuously scanning the market.
- Pulse-Reader: Forex Diamond provides real-time information about the volatility and stability the general Forex market, allowing traders to make decisions based on reliable data.
- Multiple strategies: Forex Diamond applies several strategies that could be applied in permutation and combination in mere seconds. The system also provides information on which segments of the market to avoid in order to shield the trader from a burnout.

**3. Forex Auto Millions:** Forex Auto Millions is another popular forex robot that has garnered a multitude of favourable reviews online. According to its own claims, the software has a record of generating high profits and returns. It primarily works with the EUR/USD pair in a 1 Minute timeframe. It also provides 60-Day money-back guarantee for traders. Meta Trader 4 compatibility is another useful feature it provides.

**4. Volatility Factor 2:** Volatility Factor 2 is another forex robot from a reputed developer. Adding on top of its predecessor Volatility Factor, some new features such as an advanced management system, a unique broken spy module, increased trading frequency and an improved protection system, have been added. With favourable back-testing results and great community reviews, Volatility Factor 2 is certainly one of the robots to look out for.

**5. Forex Megadroid:** Forex Megadroid is a Forex robot which promises an accuracy of more than 95%. It provides a very practical system of trading and provides a very user-friendly and detailed graph for traders to inspect. The graph differentiates strengths, weaknesses, threats and opportunities, highlighted using different colours and textures. First time users are provided with an installation kit powered by the latest Reverse-Correlated-Time-And-Price-tag-Evaluation (RCTPA) technology, along with a detailed user manual. The specifications highlight all the various software, hardware and internet requirements, allowing traders to set it up in no time.

**6. WallStreet Forex Robots 2.0:** WallStreet Forex Robots 2.0 is another automated forex trading robot, capable of running on PC, laptop and other compatible devices. It is designed for providing an in-depth analysis of the wallstreet forex market, making it an out-of-box extension for all the Wallstreet theories and formulas generated so far. Some of the modules provided by this robot include an Industry Tracker, a Business Tracker, Broker Spy, profit protection, market tracker and a Forex tracker to name a few. Every module comes with its own user-friendly interface with data tables, statistics, drill-down options, charts, graphs, etc.

Some of the features this robot provides include Risk analysis tools, simulated performance tools, Broker spy module, Trade tracking, Slippage tracking, drill-down feature, Simple user interfaces and a vast range of charts and graphs.

### **Why Forex Robots are useful?**

Forex Robots are preferred by traders because of the range of benefits they provide. It makes trading a less tedious job, allowing traders to automatically set the software to trade on his/her behalf. It removes the influence of human emotions on trading decisions, not deviating from the original trading plan of the trader. Minimum deposits are usually low for almost all forex robots, allowing even more traders to access the forex market that they couldn't do previously. you can test them out by [opening MT5 demo account in Jordan](#).

Forex robots are extremely popular these days. Traders who are looking forward to making some quick money often start using them without doing much research. Because of an increase in the popularity of forex robots, the instances of scams and frauds have gone up as well. All over the world hundreds of people have lost plenty of money. Thus, for a novice trader trying to enter the forex market, precaution should be taken while making any decision.










The above forex robots are some of the most used automated trading robots used by the forex community. Apart from the above, there are several forex robots with favourable reviews online. Conducting some proper research before coming to any purchase decision would help select the legitimate ones.

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# ROFX Review – Profitability and Reliability



Friday, June 19, 2020 5:36 AM UTC

Developed in 2009 by a team of traders and skilled software developers, robot ROFX is your personal forex trader that aims to help traders in earning profits. The robot has been used by many traders and it has been able to help them succeed, even the ones without any knowledge or formal trading experience. After conducting plenty of research and viewing [top forex robot review tests](#), here is an honest review of ROFX.

## Advantages of ROFX as claimed by the developers





There are several reasons why it is better to trade with ROFX expert advisor than trading all by yourself, such as:

1. Beginner-friendly software: As you might already know, the world of foreign exchange is complicated and it takes years to gain the ability to analyze the forex market. You must have experience of a few years to become a successful trader. So, as you start trading, using a complex EA is painful. By using ROFX, however, your job will be a lot easier. While only one percent of beginners can earn profits in trading, ROFX increases your chances of making money.
2. Wonderful trading strategy: ROFX offers excellent automated forex trading strategy so the trader can move to the top by skipping the trial and error method.
3. Elimination of human errors: ROFX expert advisor operates with the algorithmic forex trading platform which eliminates the possibilities of human errors.
4. Minimized emotions: To become a successful trader, it is important to let go of your emotions and be as logical as you can during trading. Only then, you can make the best trading decision. With the help of the fully

Market Data									
Indices	Commodities	Bonds	Forex						
				1D	1M	3M	1Y	5Y	All
SPX500USD									4617.3
S&P 500									-60.6 -1.29%
NAS100USD									15343.3
Nasdaq 100									-243.4 -1.56%
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emotions through the trading.

- 5. Consistency: With the automated trading system of ROFX, customers can achieve consistency in trading.

**ROFX EA - Features**

ROFX has a lot of excellent features that make trading easy for traders, such as:

- 1. Easy start: Beginning to trade by using ROFX expert advisor is easy. Traders can start with a trial short-term investment that is valid for thirty trading days.
- 2. Transparency: Unlike other forex robots that are scams, ROFX is transparent. Traders do not need to pay any hidden fees after they start using the EA.
- 3. Daily profit: The traders do not need to wait several days to earn profits. If a day is a profitable one, then the profit can be gained daily at the end of the day.
- 4. Deposit security guarantee: ROFX offers the guarantee of deposit security as amends are made by the reserve fund of this company.
- 5. Minimum risks: ROFX is known as a "No loss forex robot". With its stop-loss system, it can block trading and keep the loss at a minimum.
- 6. Return of funds: One of the best parts of this robot is that the trader can get back the funds he has invested back anytime.
- 7. Support 24/7: ROFX offers its support team with live chat 24/7 so customers can reach out to them anytime.

ROFX features and benefits claimed by the developers are truly wonderful. However, the reliability of the claims still remains in question. The answers can be found from the Myfxbook account of the EA robot.

**Trading record of ROFX on Myfxbook**

From the trading chart on Myfxbook, the statistics can be obtained.

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In the chart above, we can see that the account has started its journey on July 30, 2018, with a deposit of \$10000000. At present, the balance is \$55872571. Withdrawal is \$0, which means that it has made a profit of \$45872571. It has 100% equity, which is great. Drawdown is very impressive, at 0.35% currently. The gain and absolute gain of the account are +458.73%. Along with 0.26% of daily profit, the monthly profit is 7.98%. The growth is enormous in a short amount of time. Since July 30, 2018, the account has only produced great results until now.

Now, you may move to other charts that display trading, advanced statistics, and trading activity. Great results are reflected there as well, and the account maintains transparency until the very end with its clean and certain data.

Trading	Periods	Goals	Dropover
📊	Gain (Difference)	Profit (Difference)	Pips (Difference)
Today	-	-	-
This Week	+0.17% (-1.70%)	\$92085.00 (-\$970940.00)	4138.00 (-27402.0)
This Month	+0.17% (-7.80%)	\$92085.00 (-\$4024105.00)	4138.00 (-139801.0)
This Year	+46.76% (-303.15%)	\$17802000.00 (-\$4967540.00)	889121.00 (-546243.0)
Win % (Difference)	87% (0%)	401 (-1260)	950.00 (-4917.00)
Trades (Difference)	401 (-7674)	950.00 (-23166.50)	
Loss (Difference)			

Advanced Statistics	Trades	Summary	Hourly	Daily	Risk Of Ruin	Duration	MAE/MFE
Trades:	173087	Longs Won:	(68862/94760)	81%	Profit Factor:	6.29	
Profitability:		Shorts Won:	(71930/88327)	81%	Standard Deviation:	\$510.11	
Pips:	2870697.4	Best Trade(\$):	(Mar 18)	9445.00	Sharpe Ratio:	0.00	
Average Win:	24.82 pips / \$387.30	Worst Trade(\$):	(Mar 10)	-8805.00	Z-Score (Probability):	6102.62 (99.99%)	
Average Loss:	-19.34 pips / -\$268.45	Best Trade (Pips):	(Mar 18)	563.0	Expectancy:	16.6 Pips / \$265.03	
Lots:	289,538.5	Worst Trade (Pips):	(Mar 18)	-587.0	AHPR:	0.00%	
Commissions:	\$0.00	Avg. Trade Length:		5h 37m	GHPR:	0.00%	

### Is ROFX a scam?

Even though the trading results on Myfxbook are impressive, it is important to make sure that the chart is genuine and trustworthy. This is how you will do it:

Verification: How can you trust the data of a chart if it is not verified? If you look at the top of the ROFX trading chart, you will see that the track record and trading privileges are verified. Thus, it can be trusted.



started trading with a very small amount of money and earned enormous profits in no time like a couple of months, which is not realistic at all. On ROFX chart, however, it can be seen that a great amount of money has been deposited in the beginning and it has made profits through a long time span of two years.

Last update: Even though the data of the chart is realistic and the chart is verified, there is still a place for the scam. You also need to make sure that the results you are looking at are not past results but recently updated. On the ROFX chart, you can see that the chart is updated only ten hours ago, which confirms the authenticity of the data.

Open and private data: As mentioned before, all charts on ROFX Myfxbook account are transparent and you can see any data you want. Apart from the open trades and open orders, nothing is private. It is also a sign that the account has nothing to hide. So, it can be trusted.



### Final thoughts

Considering the results gained from ROFX trading account, we can reach the conclusion that ROFX is a reliable forex robot. So, we would recommend you to go for it without hesitation. However, you cannot download this robot. A free account can be created on the official webpage, and then the trader can purchase a plan to start trading.

*This article does not necessarily reflect the opinions of the editors or management of EconoTimes*

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FOREX ROBOTS are ingenious inventions that use algo  
The reason why people are using EAs is so that they  
automatically or switch to manually (as and when i  
profits at all times by trading 24 hours a day. There  
available in the market today that are designed spe  
ensure the most profitable trade for both a beginne  
If you desire to become a more profitable trader or  
proper guidance then the following list of **best Fore**  
suitable for you: –

**1. 1000pip Climber:** The **1000pip Climber** robot is t  
TrustPilot, and for good reason too. This robot has y  
verified results and the most importantly you can g  
the Forex robot. If you are new to using Forex robo  
invaluable. Overall, this is the best Forex robot for j

**2. ROFX:** ROFX is one of the most popular trading r  
advanced trading features in the market. When cor  
automated which means you don't get to select whe  
using it. **Our ROFX overview** shows that robot's acc  
gains and the number of funds on the account is \$1

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**Forex Robotron:** Forex Robotron is one amongst the only one in the market that has been tested with tick data too. Its latest version features 8 trading currencies. The account type of this robot is real and the number of gains rate is +157.11%.

**5. Dragon Expert FX:** Dragon Expert FX is quite popular. This is because they claim and prove to allow a profit on a monthly basis. Their claim is backed by their software time algorithm code along with a correlation pairs analysis. The account type is a demo and the deposited funds on the account is +218.22%.

**6. FXCharger EA:** This Forex robot claims unique trading, working on an intellectual stop-loss and take profit. It has two versions namely FXCharger basic and FXCharger Pro. The account type is real. The number of funds on the account is +157.11%.

**7. FXStabilizer EA:** FXStabilizer EA has 2 versions. It trades 6 currency pairs and allows customisation of other parameters. It provides a Forex robot that manages to trade six currencies. It provides a Forex robot that manages to trade six currencies in different modes, one with high risks and higher returns and another with low risks and lower returns. FXStabilizer EA robot's account type is real and the amount of money deposited on the accounts is \$5000.

**8. FXGoodway EA:** FXGoodway EA is another popular Forex robot that helps traders earn profits every week smoothly and consistently. It has a four years of backtesting history on a live account.

**CLOSE AD :** and the deposits on the account is \$2100. It

risk, or high risk which has a direct effect on the ou  
robot's gains are +1236.1%. The account type of this  
funds on the account is \$19,653.93.



**10. Trading Manager Pro:** Trading Manager Pro is  
excellent money management system. The robot is  
trading including fully automated and semi-automate  
account type that is real and has +361.59% of gains.  
\$1124.97.

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data to predict the correct opportunity to enter or l  
using Forex robots which automate and take the en  
you must opt for an EA right away in order to attain  
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# New RoFX Artificial Intelligence Features for Automated Trading. Full Review

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Trading in the forex market has always been an enticing prospect for all traders out there. In recent years, automated trading in the forex has largely replaced manual trading as the most popular method of trading. This usually relies on the efficiency of software in question such as EAs or forex robots. One such Expert Advisor which constantly features on the top ten lists of forex EAs is ROFX. Here is an honest RoFx review (<https://myfinassets.com/rofx-trading-robot-review/>) for traders who wish to start trading.

ROFX advertises itself as a self-learning EA which implements a profitable algorithm. It is one of the few EAs which is known for its background running capacity as well as its ability to learn the changes in the market quickly. Developed back in 2009, ROFX is backed up by a team of developers who are experienced in Forex. ROFX labels itself as safe because they guarantee the safety of deposits made by traders. They are also committed to providing transparency and operate with 100% confidentiality.

**If you are looking for the perfect trading strategy tailored to your preferences then click here to take our FREE Benzinga Trader Strategy Quiz! ([https://www.benzinga.com/premium/ideas/trader-quiz/?utm\\_source=campaignify](https://www.benzinga.com/premium/ideas/trader-quiz/?utm_source=campaignify))**

ROFX can be bought in either USD, EUR, and even Bitcoin. It offers 5 account packages, namely, Trial packages, Easy start package, Money maker package, Gold package, and VIP package.

## Salient Features

ROFX has some features that enable it to deliver profitable trading experiences to its users. Some of these are mentioned below.

- **Easy Initiation:** ROFX allows almost any amateur trader to start trading short term investments within the first month.
- **Daily Profit Collection:** ROFX allows its users to take the profit they've earned on a daily basis, provided the day was profitable.
- **Minimum Risks:** ROFX employs the stop-loss system to stop trading to allow the most minimum of losses.
- **Guaranteed Return of Funds:** Investors can get back their invested funds at any time they wish.
- **No Leverage:** Trading with leverage is not allowed in ROFX.
- **Support System:** ROFX has a responsive customer service team that works around the clock, 24/7. There is also an option available for live chat.

## Advantages of using ROFX

- **Novice-friendly:** One of the most obvious benefits of using ROFX is that it is beginner-friendly. It's a well-known fact that novice traders tend to struggle when using an EA for the first time. ROFX makes it easy to get acquainted with the environment and to start

- **Trading Strategy:** ROFX’s trading strategy has been formulated by a group of forex experts after considerable testing. This makes it easy for novice traders to easily hop on-board and start trading. They can thus skip their usual trial and error approach and work towards profitability.
- **Verified Results:** As we’ll see in the section below, ROFX has provided verified trading statistics and results on sites like myfxbook.
- **Transparency is Paramount:** ROFX is committed towards transparency which reflects in their practices and policies. As part of this, ROFX provides all information on their myfxbook page, something not all EAs do.

**Trading Record on myfxbook**

There no denying that there is a multitude of Expert Advisors available in the market, each claiming to offer the best degree of profitability. While there is no way to confirm these claims on the spot, traders can check for live trading statistics from authoritative sites such as myfxbook and fxblue to get a better picture. In this case, ROFX has provided us with a live account, hosted on myfxbook.

In the above account, we can see that the total accumulated profit stands at \$46042706.00 and the account has a current balance of \$56042706.00. On the tab at the top, we are presented with information regarding the account including that its using USD and Ester as the broker. The bottom-left tab indicates that the information has been updated quite recently. All of these are signs that the account is indeed in order and verified frequently.

The information in the account indicates that the account has indeed gained an impressive profit of 463.43% with an amazingly low drawdown rate of 0.35% Low drawdown rates are always favorable and indicative of a good, low-risk trading strategy. All the other aspects pertaining to this account, including the trading charts and other trading records.

After looking at the above account, it’s clear that ROFX makes realistic claims on its website. When comparing other trading statistics from EAs, many may have a profit that is generated almost magically from a small initial investment. However, it is clear from the records of ROFX that the account started with a small amount and gradually grew as it earned profit over the years. These are definitely more reliable figures to consider.

**Conclusion**

With the growth of automated trading, traders are realizing the potential of using software such as Expert advisors for profitability, largely replacing manual trading. Additionally, there are ample reasons to include ROFX in the list of the best Forex robots available. Apart from being an excellent forex robot with a bunch of amazing features, it provides trading records and proof on its official website. The registration process is fast and easy, taking about 5 minutes.

Overall ROFX has impressed us with the quality of statistics it has provided and the salient features it possesses. At a time when markets are saturated and potential buyers can get confused while choosing, ROFX displays all the hallmarks of being a reliable trading robot.

**Media Contact**

**Company Name:** Digital Solutions Int

**Contact Person:** Haris

**Email:** Send Email (<http://www.universalpressrelease.com/?pr=new-rofx-artificial-intelligence-features-for-automated-trading-full-review>)

**Phone:** 923110258428

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# Detailed ROFX Review: Thinking to invest in a Forex Robot?

By **Atebits** - September 17, 2020



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We've seldom seen Expert advisors and forex robots work, especially in a competitive market such as forex where lots of volatility is involved. However, one name comes up in many trading circles time and time again: ROFX. Established in 2009, ROFX was created by a team of expert forex software developers and traders aiming to help novice and experienced traders earn significant profits from the forex market. ROFX focuses on efficiency, simplicity, and transparency.

ROFX is packed with a lot of features that make forex trading very easy and exciting. [This ROFX review](#) will take a look at all the features and some live statistics to come to a justifiable conclusion.



Why Traders Use ROFX in the first place?  
Salient Features of ROFX  
Trading Statistics from Myfxbook  
Is ROFX a scam?  
Conclusion

## Why Traders Use ROFX in the first place?

- **Easy to Set up:** ROFX provides a 4 step process for getting started, making it easier for newcomers. Users first register their accounts, after which the robot generates trading signals. The forex robot then reproduces the signals to the user's managed Forex account, with the user receiving the profits in the end.
- **Effective strategy:** ROFX has a wonderful approach in place, which allows novice traders to execute trades in the level of expert forex traders right away.
- **It eliminates emotions:** Human emotions have a big part to play when traders are manually trading. One of the reasons EAs are so popular is because of its automated nature. ROFX, with its automated trading strategy, eliminates the effect of fear, greed, and anger from trades. This helps users not incur losses due to incorrect judgments made due to human emotions.
- **Consistency:** Because the EA is fully automated, users can achieve consistency in trading by using ROFX.

## Salient Features of ROFX



- **Multiple account options:** Since ROFX mainly targets its services to all types of traders, they offer six different account opening options. These include Easy start, Trial, Gold, Moneymaker, VIP, and VIP PAMM Account. The minimum deposit requirements for these accounts range from \$1000 to \$100,000, giving users a vast variety when it comes to investing capital.
- **Direct Trading:** Unlike many other forex robots in the market, users do not need to download any additional software for accessing ROFX. They can simply visit the website and use the service from there. ROFX provides a very user-friendly and intuitive interface where users can look up anything from account balance to profit history.
- **Guarantees Deposit Security:** By making regular amendments to the reserve fund, ROFX ensures the security of its traders' funds at all times.
- **Providing Transparency:** Transparency is essential when it comes to an EA. ROFX provides all their details on their website. They do not charge any hidden fees for services, with everything listed in detail.
- **Minimum Risk:** There are very few EAs with a "no loss" policy, with ROFX being one of them.
- **Daily profits:** Unlike the majority of EAs in the market, ROFX allows its users to withdraw their profits daily if they so wish.
- **All-day Support:** To answer all customer queries, ROFX has a dedicated customer team in place, providing 24/7 coverage.

## Trading Statistics from Myfxbook

To increase transparency, ROFX has been regularly updating live statistics on myfxbook for quite some time now.

The account we're looking at here has achieved a gain of 579.49%, which is satisfactory. The account currently has a balance of \$67949016.0, with a profit of \$57949016.00. It also has a low drawdown rate at 0.35%, indicating that the strategy ROFX uses is indeed safe. EAs which produce high drawdown percentages almost always employ high-risk strategies such as scalping. In ROFX's case, everything seems to be in order. On the left-hand side of the graph, we can see that the statistics are regularly updated.

## **Is ROFX a scam?**

Potential users have always feared about walking into a trap, as many Expert Advisors have turned out to be outright frauds in recent years. Thus, when selecting an EA, users have to do some background checks on the company behind it, as well as look for some trading statistics which they can use to evaluate the product. ROFX provides all its details on their official website, along with the impressive myfxbook details. All the signs point towards a well-researched, well designed, proven forex robot. It also puts various security protocols in place to protect the client's funds.

## **Conclusion**

The forex robot industry has been growing since the introduction of expert advisors, as these software programs provide the opportunity for novice traders to produce the same levels of profits as experienced ones. It's a well-known fact that the forex industry can be quite competitive, frustrating, and nerve-racking for newcomers, with only one percent of all beginners being successful in forex. However, by using ROFX, a user has more chances of getting profits earlier on.



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# ROFX EA REVIEW

NOVEMBER 3, 2020



Hi, welcome again to our [best ea forex](#) website! This time we will be doing a RoFx EA review on our website. Furthermore, as consistently, we are featuring the main parts, highlights, and settings of this creative EA. Thus, if you are searching for the best review of the RoFx EA, you are in the best spot! Also, remember to look at our whole blog; our group is continually refreshing it with new reviews of the most recent best forex robots! Along these lines, we should plunge into the RoFx EA review as of now! Will we add this one to our [best ea forex](#) page?

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2. RoFx EA Features
3. Who is behind RoFx EA?
4. RoFx EA Trading Strategy
5. EA Packages/Prices
6. Pros
7. Cons
8. Conclusion of RoFx EA Review

## What is RoFx EA?

Today our RoFx EA review will be unique. Since this time, we experience a robot that works with artificial intelligence while at the same time trading. Furthermore, it is likewise 100% automated programming. If you have been in this industry for quite a while, you more likely than not found out about it previously. What's more, some expert dealers state the RoFx EA is the best master counsel dispatched to date. Thus, you would already be able to envision how crazy it is! As we referenced, this EA trades utilizing artificial intelligence, just as quite certain numerical calculations. Thus, these two joined work as a lucrative machine that will make your account and benefits soar. However, that is not the finish of it. The RoFx EA has another mind-boggling highlight: the complete return of the misfortunes while trading. Truly! Precisely what you heard! The developers of this EA are so certain with the robot they made that they give and back the funds. Yet, remember that it probably won't occur, as the likelihood of drawdown while utilizing this robot is overly low. So you would already be able to envision how great of a robot it is!

## RoFx EA Features

Now, it is the turn of discussing the features of this EA in this review.

Signs for new trades accessible.

Losses inclusion ensure.



- Stable, easy revenue.
- Cash wellbeing.
- No influence.
- Least danger while trading.



## Who is behind RoFx EA?

In this piece of the RoFx EA review, we are giving you data about the group that works behind this astounding robot. Along these lines, we will search for their names, area, and trading experience. This time, the seller gives data about them on the official site. What's more, it says this robot was made in 2009. Thus, a gathering of effective Forex merchants and developers made this automated trading framework. Furthermore, at some point later, they chose to sell the robot on the web. Be that as it may, initially, they did a great deal of backtesting with their cash.

So they could guarantee it turned out great with all the inventive highlights they actualized. Thus far, since dispatch, this robot has just great positive reviews and staggering execution. The central command of the RoFx EA is situated in the United Kingdom, Miami, and Hong Kong. So you would already be able to envision the achievement they have had since the very first moment! In any case, the main thing they don't give is the names of the makers and developers of this robot.

## RoFx EA Trading Strategy

For this piece of the RoFx EA review, we should uncover all you require to think about the exhibition and, generally speaking, the trading system. Along these lines, as the developers state on the official sales page, you needn't bother with any insight to be fruitful with this robot. What's more, it doesn't make a difference on the off chance that you are a specialist or fledgling; you will get great benefits with the RoFx EA. Since the dispatch of this robot in 2009, it has consistent benefits day by day. Furthermore, the month to month gains goes from 8% to 10%, contingent upon the money pair you choose to trade. As far as the exhibition of the robot, you can check the outcomes from the Myfxbook account they offer.

All backtesting was made with genuine cash from the makers. Additionally, these developers are so sure with their strategy that they give assurance of return if you lose cash. Along these lines, you can be certain you will just make benefits while working with it. The danger while trading is just 0.38%, regardless of the bundle or pair you are utilizing. What's more, it is completely automated. So don't need to go through hours sitting before a PC to pick up cash. The greatest issue we can look with this robot is the value; the most reasonable permit is USD 1.000. You get half of the pay straightforwardly to your record.

Also, it trades just with the EURUSD and GBPUSD pair. So these two may be the main disadvantages while utilizing this robot. Since, as it is costly, you get the security of your assets by the organization. Furthermore, they likewise completely spread the losses of the robot. So things being what they are, it is a success win circumstance! As there is no danger while putting resources into this

## EA Packages/Prices



Introductory store: USD 1.000-5.000

Trading days: 270

Execution expense: half

Your offer in the day by day benefit: half

#### **Progressed Compound Easy Start**

Introductory store: USD 5.000-10.000

Trading days: 270

Execution expense: 40%

Your offer in the day by day benefit: 60%

#### **Progressed Compound Moneymaker for BitCoin**

Introductory store: USD 10.000-50.000

Trading days: 270

Execution expense: 25%

Your offer in the day by day benefit: 75%

#### **Progressed Compound Gold**

Introductory store: USD 50.000-100.000

Trading days: 270

Execution expense: 15%

Your offer in the day by day benefit: 85%

#### **Progressed Compound VIP**

Beginning store: 100.000-Unlimited

Trading days: 270

Execution charge: 5%

Your offer in the everyday benefit: 95%

## **Pros**

Live confirmed outcomes from Myfxbook.

The designers ensure all inclusion of losses.

You can support your record utilizing Bitcoin, USD, or EUR.

Merchants can pick the installment strategy that suits them best, going from USD dollars or even Bitcoin.

## **Cons**

All the bundles offered are unimaginably costly.

It trades just on four significant money sets. These are EURUSD and GBPUSD.

## **Conclusion of RoFx EA Review**

We must finish our RoFx EA review article! What do you suspect as much far? For us, this EA is an incredible decision. It is truly costly. Furthermore, we realize most new merchants don't have this measure of cash to contribute immediately. Yet, if you do, you should look at it! It won't baffle you. Since it has been going solid for more than 9 years on the lookout



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# ROFX Review: Reliable Automated Trading System That Generates Passive Income

[Ernest Hamilton](#), Tech Times | 30 November 2020, 11:11 am



(Photo : ROFX Review: Reliable Automated Trading System That Generates Passive Income)

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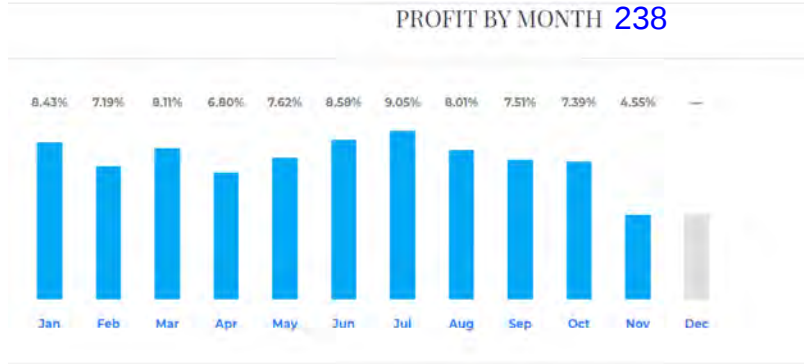
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(Photo : Impressive trading background)

Package	Amount (USD)	Trading days	Your share in the daily trading profit (%)	Performance fee (%)
ADVANCED COMPOUND Trial	1,000 – 5,000	120	50	50
ADVANCED COMPOUND Easy start	5,000 – 10,000	120	60	40
ADVANCED COMPOUND Moneymaker	10,000 – 50,000	120	75	25
ADVANCED COMPOUND Gold	50,000 – 100,000	120	85	15
ADVANCED COMPOUND VIP	100,000 – UNLIMITED	120	95	5

**\*Advantages of Advanced Compound Packages:**  
 - profit compounding by default without updating the trading period  
 - add funds option do not roll over trading period of package  
 - the highest profit as compared to all packages


(Photo : User-friendly)


**About RoFx: Background**


Developed by a team of software developers and expert traders in 2009, RoFx is a reliable [automated trading system and profitable forex robot](#). The automated system has been one of the most profitable of its kind since 2010, generating consistent profits for its users. It produces a monthly return of roughly 10%. RoFx is a source of generating remarkable passive income, which is helped by the fact that the platform also focuses on transparency. The EA is driven by AI technology and offers a low level of drawdown. For any losses incurred by its users because of the robot's fault, RoFx promptly compensates them through their reserve fund. Their positive reviews on various financial forums have made them a standout in the industry, which is why we've decided to review it.


**Automated forex trading: What's it about?**

Automated forex trading involves the use of a special class of software known as forex robots or expert advisers, which trade on a particular asset. This includes trading signals as well as copy trading or social trading. A trading robot can either tell the trader where to buy and sell or execute trading commands on its own. Despite what some advertisers claim, there is actually

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only a handful of EAs which can accomplish consistent profits. This is mainly because of the ever-changing nature of financial markets, where a successful EA may not work well in certain conditions.

## How EAs usually work?

Expert advisors are regularly installed within the software directory of MetaTrader. Based on the set algorithm, the software opens or closes trades and works fully automatically on the set inputs. The demo account allows backtesting which can give traders peace of mind. They can easily see for themselves whether the forex robot is profitable or not.

## The Occurrence of forex robot scams

Scams have been prevailing in almost every sector of financial markets and the forex automated trading market isn't immune. The most common type of such scams involves some kind of get-rich schemes which entice unsuspecting customers with flashy advertisements. Sometimes they can even guarantee a profit of 100% per month. In reality, these are elaborate frauds designed to swindle money from people. This software is generally poorly programmed and ignores the ever-changing market conditions.

## Advantages of Automated Forex Trading

- It serves as an excellent and consistent source of generating passive income.
- It prevents traders from committing emotional-based trading mistakes.
- Better risk management is achieved.
- A trader doesn't have to be a professional trader to succeed.
- Fully automated as all aspects of trading are handled by the robot.
- Allows back-testing, which serves as evidence for a particular robot's performance.

## Disadvantages of automated forex trading

- Requires a steady internet connection as any outage may result in trading losses.
- The majority of forex robots do not take into account economic and political news that affects markets.
- Expert Advisors that trade without implementing a stop loss can put a trader's account at risk of ruin.

## Is RoFx legitimate?

RoFx is a well-known Fintech company which has expanded over the years to include offices in the U.S., U.K., and Hongkong. Anyone can make an appointment and visit their head office in London. RoFx even holds an annual conference event for VIP clients, even though normal clients can attend it by making a special request.

RoFx is not required by legislation to adhere to any financial regulations. In spite of this, to be committed to providing transparency, the company works with a number of high profile brokers in Asia, America, and Europe, which are in turn heavily regulated.

## Comparing RoFx with other trading Expert Advisors

The process employed by **RoFx is fully automated** compared to its peers in the market. Users can simply deposit their money from which point the EA takes over. They can use Dollar, Euro, or even Bitcoin to make the deposit. RoFx does not have any complicated installation process and the setup is seamless.

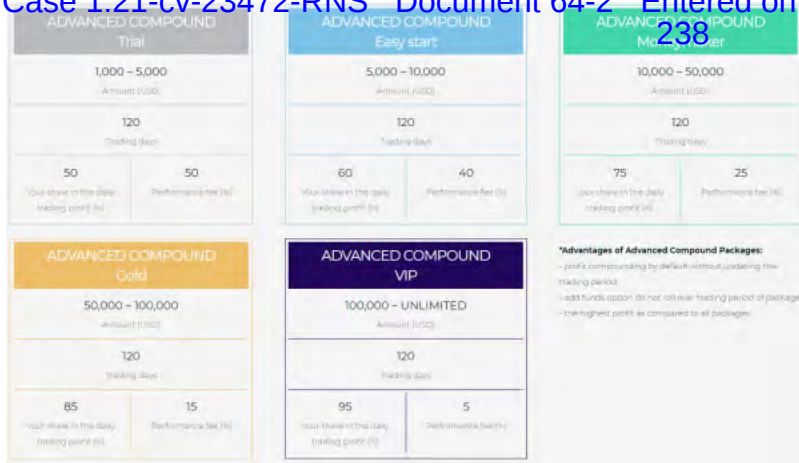
- Algorithmic trading:** The algorithm used by RoFx has been tweaked multiple times over the past decade to adjust to changing market conditions. The robot is equipped with a self-learning neural network, helping the software to learn the market conditions by continually scanning them. From the trader's perspective, all that is required is a computer, a working internet connection and the initial deposit amount to get started.
- Impressive trading background:** The trading records that RoFx produces for the past ten years is proof enough for the robot's effectiveness. The records are transparent, showing the daily profits and monthly gains generated by the system, which are verified by myfxbook.

PROFIT BY MONTH



PROFIT FOR NOV, 2020

- User-friendly:** RoFx offers direct access through their website, which means clients do not have to install any additional software. It also provides some reasonable packages at low costs. The base package consists of a minimum of 50% daily profit which increases up to 95% as one upgrades his/her package.



- Minimal risk:** RoFx takes good care of their client's money. This is evident from the monthly analytics chart on RoFx's Myfxbook page. Over the ten years, the results show that the EA has never experienced a month with a loss. In case a loss has occurred, the company has compensated its users through its own reserve fund. There are other EAs in the market that do not employ stop losses and use scalping strategies which can ruin trading accounts. With RoFx, it is the exact opposite as the system uses no leverage and employs a stop loss.
- Customer Service:** RoFx provides a very good level of customer service, something which is not seen in other famed trading robots such as Hamster scalping, Odin, or GPS. Users can contact the team through a chat option as well.

Feature	RoFx	Other Trading EAs
Consistent monthly profits		X
No use of leverage		X
No risk involved		X
24/7 Customer support		X
Easy for a beginner		X
Verified Trading Results		X

### Some additional information about RoFx

Users can simply go to the official website, register an account, and deposit the minimum amount of \$1000 to get started. They can monitor the robot's activities by logging in. The profit calculator also gives the user about how much the robot can earn.

RoFx offers easy withdrawal options, with a minimum cash out of \$1000. Users can use Bitcoin to withdraw any amount lower than this. The company pays any commission charged by the bank in case a user chooses to draw money after their package has expired. Domestic Ach is available for customers residing in the United States.

## Final Thoughts

The majority of software of this nature performs well in tight time space, but fail to replicate profitability in all market conditions or for an extended period. A majority of these are usually ineffective or worse, frauds. It's pretty easy for a novice to get enticed and trapped into such elaborate scams. On the other hand, RoFx provides transparency, giving the user a straightforward idea about what they can expect from the robot. It produces a consistent monthly growth of 8% to 10%, which are strong levels all traders are happy with.

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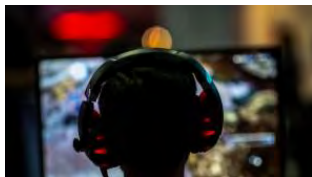
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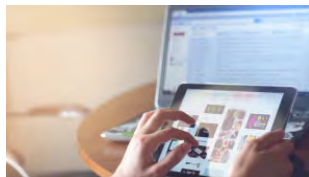
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## RoFx Review: Generate Passive Income Easily

Jan. 28, 2021 223



***José Rodríguez***([editors/jose-rodriguez/](/editors/jose-rodriguez/))

([editors/jose-rodriguez/](/editors/jose-rodriguez/))

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The last decade has seen the emergence of a class of software known as Expert Advisors, or forex robots, which have consistently delivered profits in an automated fashion to their clients. While there have been quite a few frauds, there have been some success stories over the years as well. This brings us to RoFx, which is a reputed forex automated trading robot(<https://myfxtools.com/best-forex-eas/>) and Expert Advisor.

Developed in 2009 by a skilled group of forex developers and traders, RoFx was first a private automated system. Since 2010, after the software was released to the public, RoFx has constantly generated stable profits with an average monthly return of 10%. They provide an easy gateway to passive income generation with increased transparency. The technology behind the EA is powered by artificial intelligence. Among other features, this



robot offers a low drawdown rate and compensates users for their losses via their reserve fund. Because RoFx has been attracting good reviews on various financial forums, we decided to check out what they have to offer.

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## But What is Automated Trading?

Before we begin discussing RoFx, we need to be clear about what automated trading refers to. Automated trading involves the use of a forex robot or expert advisor, which is usually installed within MetaTrader's software expert's directory. The software takes trading decisions based on a set algorithm, requiring no inputs from the user. It allows back-testing even in a demo account, which allows users to check whether the EA truly works or not.



(<https://ihodl.com/media/attachments/f/6a/e3f4b16af.jpg>)

## Frauds in the Forex Robot Market

Frauds in the financial market are nothing new. In the EA market, they usually take the form of "get rich quick" or "100% profit" schemes. The main aim of these scams is to entice unsuspecting traders into using their services, which end up being totally worthless. In reality, these robots cannot even produce a gain of 10%, falling way below what they promise. There are some EAs that can take traders' accounts into margin calls, thereby ruining them. Such systems are a result of poor programming as they do not take into account various conditions of the market.

## Advantages of Automated Forex Trading

The advantages of automated forex trading are much. First of all, it's a proven source of generating passive income. As automated trading software, EAs prevent traders from conducting emotional-based trading. Traders can also achieve better risk management when using such robots, as some of them even allow users to modify their settings to take profit and stop loss. One doesn't need to be a professional trader to handle an EA. It also provides its users to back-test the robot, with results being produced within minutes.

## Disadvantages of Automated Trading

In spite of all the advantages stated above, there are very few disadvantages as well. First of all, one needs to have a stable and working Internet connection at all times. Failures in the system may adversely affect trading results. The majority of EAs do not take into account economic and political news. Worst of all, there are EAs that work without a stop-loss system that can risk an entire account's funds.

## The Legitimacy of RoFx

RoFx is a fintech company by nature, with offices spread across the UK, US and Hong Kong. Their head office, located in London, can easily be visited by making an appointment. The company also holds an annual conference event meant for VIP clients. The average client can attend the event too if they request the support team. As it is a mere software provider, RoFx is not required by law to be under any kind of financial

regulation. But since they are committed to security and transparency, they have partnered with major brokerages in Asia, America and Europe, which are, in turn, regulated by the corresponding authorities.

## Difference Between RoFx and Other Similar EAs

Compared to other similar products on the market, RoFx is entirely automated. There are many deposit options available, after which the EA does the rest. RoFx accepts USD, EUR, and even Bitcoin. Additionally, RoFx does not involve any cumbersome downloads.

- **Good track record.** The way RoFx has been operating for the past ten years is proof that their system delivers stable profits. They provide complete information on the robot's daily profit and monthly gains on their website, which are verified by Myfxbook.
- **The intelligent algorithm in place.** The algorithm used by RoFx has been modified and adjusted multiple times during the course of its operation. It makes use of a self-learning neural network, which procures information from the market by constantly scanning it. It constantly searches for the best ways to make a profit for its clients. All it requires is a working computer, a stable Internet connection and the initial deposit amount to get started.
- **Customer-oriented.** RoFx does not require any application to be downloaded as the service can be accessed directly from its website, where numerous lucrative account packages are available. The base package promises a good daily profit, which can rise as one increases their investment.
- **Investing without risk.** RoFx is designed, keeping in mind the security of client funds. The chances of losing money with RoFx are almost nil. To provide increased transparency, all monthly analysis charts can be accessed at Myfxbook.com. There are no months in the negative during the entire operation span of this software. In case a user incurred a loss, it has been compensated through RoFx's reserve fund. This is much better than other EAs, which mostly work without a stop loss system

and implement risky strategies putting a trader's account at risk. RoFx, on the other hand, does not allow leverage trading and has a stop-loss system in place.

- **Customer Service.** Customer service is almost a staple for every forex robot or EA. But many big names in this market, including the likes of Hamster scalping, GPS, and Odin lack in this aspect. However, RoFx has a responsive customer service team in place, capable of dealing with customer queries in an efficient way. There is even a live chat option available.

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Other Relevant Information Regarding RoFx

Unlike a bunch of other forex robots, RoFx does not require any additional downloads. It's simple to start, as the user just needs to visit the official website, register his/her account, and deposit the minimum \$1,000 amount to get started. Users can monitor how the robot is performing by logging in. There is also a profit calculator, which helps estimate how much profit the robot can earn.

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Additionally, the company's convenient deposit and withdrawal options also help to expand its existing customer base, increasing accessibility to even more traders worldwide. The minimum withdrawal amount is \$1,000. However, one can use Bitcoin to withdraw any amount lesser than this. If a user decides to withdraw their money after the expiration of their package, any commission taken by the bank is paid by RoFx. They allow users to withdraw at any time they please.

## In Conclusion

The majority of EAs and forex robots in the market can produce results over a certain period of time but are ineffective during long periods. As mentioned earlier, some of them can be outright frauds that entice unsuspecting clients with their ridiculous claims. Novice and smaller traders often get attracted to these offers and get trapped. RoFx is different as it provides a high degree of transparency via the way it works and its website. Along with verified records on myfxbook, and proper risk management tools, this robot promises a decent monthly growth.



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# 2021 – The Best Forex Robots to Expect



by **Guest User** — Jan 30, 2021 at 06:26 am Reading Time: 4 mins read



The forex robot space is often quite challenging because there are innumerable options. Each robot promises a gamut of benefits, claiming to be the best friend of the trader, encourages trades with the hope of churning profits – and all through automated trading. Now, amongst all these, there are forex robots that promise profits, but traders end up losing a lot of money. The worst happens when traders use up all their investments, in pursuit of profits.

But help is available online which can help traders move on the right path. Are you searching for the best forex robots to enhance your profitability, or if you are looking forward to some

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When you are choosing a forex robot, there are a few facts you should consider during your selection.

- **Try a Demo Account** – It is wise to test a robot in a virtual environment, instead of taking it to any real market and then risking the money. However, one needs to remember that test environments might not always depict the real condition, but it is helpful in selecting the robot. It still helps the user to measure what the FX robot might offer.
- **Testing** – It is necessary to test a robot against variable spreads & also real slippage before it is used. Backtesting can also be considered for checking the results. Besides this, even data from authoritative websites like myfxbook are also quite effective in the evaluation of the robots.
- **Drawdown** – Low drawdown is a good sign. It means a decline or reduction of capital. If there are high drawdowns, it means more gains. It also means exposure of an account to unnecessary risks.

## Scams – Traders Need to be Cautious

Whenever you are in search of forex robots, you must remember that there are several products that claim to provide huge gains. However, all these robots are not able to provide any real-time based evidence. Here, one needs to remember that user reviews are helpful, but again these can be fake.

Today, there are hundreds of scam robots present. Thus, as a forex trader, one needs to keep a watch and eye for various red flags. There might be problems related to withdrawals, or instances

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## Top Forex Robots of 2021

**RoFx** – RoFx has been around for more than a decade now. Developed by an expert team of forex traders, this robot is considered one of the most consistent robots today. Its key feature is its artificially driven neural network which adjusts with great ease as per changing market conditions. Its compensation plan is also another significant feature of this robot which is facilitated by the reserve fund of the robot. Other significant features include signals for new trades, consistency in profits while trading, guarantee for loss coverage, no leverage, stable passive income, and low risk when trading. [RoFx is one robot that is suitable not just for experienced traders](#) but novices as well. The minimum deposit required for trading is \$1000.

**Perfect Trend System** – This is an online platform, the objective of which is to transform different investors into better traders. The system provides signals to different investors. This system lets the trader avoid the hustles of not being able to execute trades on time. It offers the best entry points & exits. The blog section of their website has several helpful articles and blogs for traders helping them to trade and win trades.

**Flex EA** – This is one of the best performing forex EA which is suitable for MT4 and MT5 platforms. It comes with verified EA results. There are several useful features of this system which include its 12 selectable strategies, its money management feature, it supports all currency pairs, includes optimized settings, and is FIFO compatible. Users should go through the features of Flex EA before they start using it.

**Point Zero Trading** – This is a forex developer that claims to create expert advisors and indicators that are suitable for different versions of the Metatrader trading platform. All expert advisors are properly coded so that safe and predictable execution of trades is carried out. They also offer several free trading tools. The advisors and indicators provide great flexibility.

**FX Delta** – Introduced in 2016, FX Delta was developed by a veteran forex trader Yordan Kuzmanov. FX Delta is a trading system that can be used by both experienced and novice traders.

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If you manage to select the right forex robot has the capacity to change fortunes. Even novice traders who are looking forward to making passive income can benefit from such robots. However, traders need to be aware that any forex robot which promises extraordinary gains under all market conditions, might not be the right choice.

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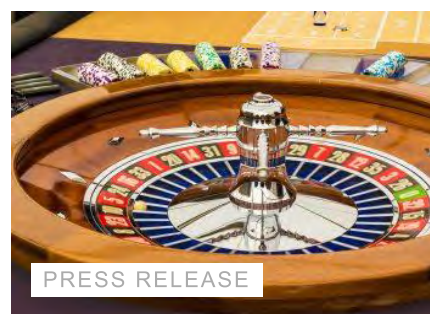
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# The Best Five Forex Robots of 2021

 by **KryptoMoney Staff** — February 17, 2021 in Sponsored

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The concept of forex robots is full of confusion. Some **forex robots work really well and offer lucrative profits to traders through automated trading**. However, the market is full of scam robots that claim to provide substantial profits but disappoint the users with poor performance. In the worst-case scenario, you will not only fail to earn profits, but you will also lose the capital you have invested if you choose fraudulent forex robots like this.

Fortunately, you can access a vast range of information online that can guide you to choose the right **automated trading service**. If you are looking for a forex robot that performs best in order to enhance your chances of profitability and generate passive income, you need to pick the right robot and you have to learn how to choose the best one.

### **Considerable factors to choose the best forex robot**

You should take these factors into account to choose the right forex robot:

- **Thorough testing**

When you choose an EA or trading robot, you must test it against various spreads and real slippage before you can call it usable. Backtesting result is also an essential factor regarding this subject because it can help you to make the final decision. Traders can visit authoritative and reliable sites like Myfxbook to gather third party data that can help them assess the trading robots.

- **Drawdown**

When it comes to the statistics of trading results, traders always prefer a low drawdown. It stands for the decrease and decline of capitalism. On the contrary, a higher drawdown can refer to higher gains, but it can also cause unnecessary levels of risk to the account.

- **Using a demo account**

When you use a trading robot in the real market, you risk your money. So, before doing it, test it in a virtual environment. It will allow you to test the trading strategy using virtual money. However, keep in mind that the trading conditions in a demo account do not always represent real market conditions. Yet, it will provide you a clear idea of what the forex robot has to offer.

- **Avoiding forex robots scams**

evidence. Although user reviews are a great source to know if a robot really works, you need to know for sure that those reviews are genuine. The internet is filled with scam products which is why you must always watch out for the red signs. These signs include things such as the EA behaving differently than how it was advertised, profits not adding up, issues while withdrawing money after depositing once, and more.

This is the reason why Myfxbook is so important because it can help you to know if a robot is a scam or reliable. You must go for EAs only from trustworthy developers with goodwill and clear background. Developers must always show transparency while offering information involving the fees, offered services, and past trading results if they want their clients to start them.

### The top forex robots for 2021

Some of the best forex robots for 2021 are:

- **ROFX**

Designed and developed by a **group of professional forex traders and expert developers, RoFx** has earned the title of being one of the most consistent forex robots in the market for over a decade. Its self-learning neural network is an important feature of this robot that keeps it updated with the changing market conditions. Another great feature is the company's superior risk management that offers compensation to clients for lost trades from the company's reserve fund. If you visit the Myfxbook page of RoFx, you will see that the account has an impressive gain of 811.29%. Alongside major fiat currencies, BTC funding is available as well, if you care about your private data security.

Minimum Deposit: \$1000

- **Forex Fury**

Forex Fury is the result of years of hard work and the development of a group of forex traders. The robot has been showing great trading results consistently for three years now. The EA is compatible with various trading platforms like MT4, MT5, NFA, FIFO, and more. The developers are always updating it with tested and proven settings and making it better. Other important features include ECN support, effective money management, multiple filters to avoid odd market conditions, and easy installation. Forex Fury works with any MT4/MT5 trading brokers and the EA is also perfected for multiple pairs. The drawdown is less than 20% which is quite impressive and evidence of its low-risk trading strategy.

Minimum Deposit: \$100

Flex EA is a verified FX EA that uses a newly developed innovative technology involving virtual trades for trading. To put it simply, the EA opens virtual trades in the background and uses them to monitor the market continues to help traders determine the accurate entry point where the EA will automatically start opening and managing real trades. Unlike many other automated systems, Flex EA can work long-term with its automatic update system. So, traders can be sure that their copies are always up-to-date. You can view the live trading results on the website that are verified by Myfxbook.

Minimum Deposit: \$100

- **FX Delta**

FX Delta 2.0 is a powerful propriety forex trading system that both novice and experienced day traders can use for leveraged trading. It is an all-in-one package with newly integrated intuitive trading features, a versatile user dashboard, and additional filtering parameters that result in more optimal trading conditions. Core features of this EA include signal alerts, visual trade manager, flexible money management, aggressive and conservative setups, post-trade adjustments, full customization, and more.

Minimum Deposit: \$500

- **Ninja Scalper**

This EA was developed to run the EUR/USD on the 5-minute timeframe. Ninja Scalper uses statistical analysis of the EUR/USD for more than 20 years to determine the best entry and exit points on the market. The operating base of this EA uses a strategy based on the MACD indicator along with other trend indicators.

Minimum Deposit: \$30

**Conclusion:**

You must keep in mind that no forex robot can always perform well because market conditions keep changing all the time. However, that does not justify the actions of the scammers. These days the market is full of fraudulent robots. Therefore, you must be cautious when you pick a forex robot. Make sure to research well and also check testimonials before you choose a robot. No matter which robot you buy, you must check the live trading results to view the gain and drawdown as well.

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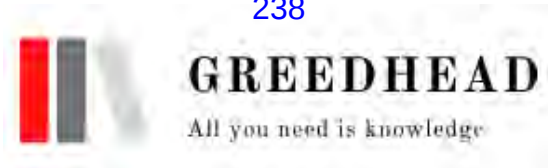
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# Is ROFX legitimate?

March 12, 2021 | By Alexis Flynn | Lifehacks

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## Is ROFX legitimate?

Developed by a team of software developers and expert traders in 2009, RoFx is a reliable automated trading system and profitable forex robot. The automated system has been one of the most profitable of its kind since 2010, generating consistent profits for its users. It produces a monthly return of roughly 10%.



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## What is ROFX net?

RoFX Net is an expert advisor or forex robot that automatically trades currencies and cryptocurrencies including Bitcoin on your account.

## How long has ROFX been around?

ROFX is a company of expert advisor software with over ten years of experience in the forex market. Starting its journey in 2009, ROFX has become one of the leading forex EA service providers for traders around the world. Today, the company has more than 50,000 active international customers.

## Does Odin forex robot really work?



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With over 240 reviews on Forex Peace Army, the Odin Forex Robot and the ForexRobotTrader.com team have a 2.4 out of 5 star rating. Considering the promises of large profits, the overall client base is quite disappointed by the performance of these robots.

## How many weeks are traded in a year in 2021?

2019, for instance, consists of 252 trading days (2020 has 253 trading days, 2021 has 252 trading days) out of a total of 365 days in a year and mathematically translates to around 4.85 trading days a week.

## How many days will the stock market be open in 2021?

In 2021, U.S. bond markets close on eight of the nine days the stock exchanges are silent, including July 5. (The exception is Good Friday.) They also close on Columbus Day (Monday, Oct.

## What do you need to know about rofx.net?



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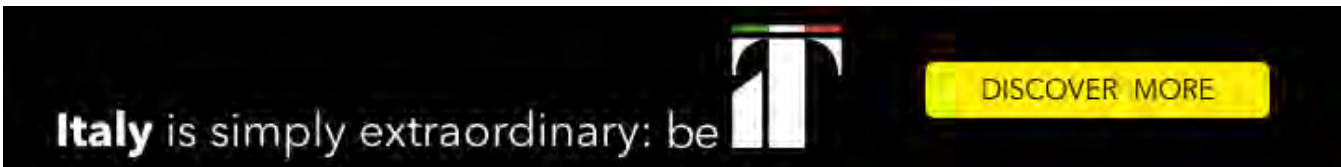
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RoFx is a CFD brokerage based presumably in the UK. It provides an unproven web-based trading terminal, not the MetaTrader 4 trading platform and an exceedingly high minimum deposit of just \$1000, however, further trading conditions remain undisclosed.

## How can I get a free rofx account?

1. Visit the Rofx website and open a free account 2. Complete the form and the registration to get your account 3. Complete the log in to your account 4. Discover Rofx platform 5. Fund your account 6. Keep an eye on the platform With over 5.1 trillion dollars per day, Forex is the largest market by volume in the world.

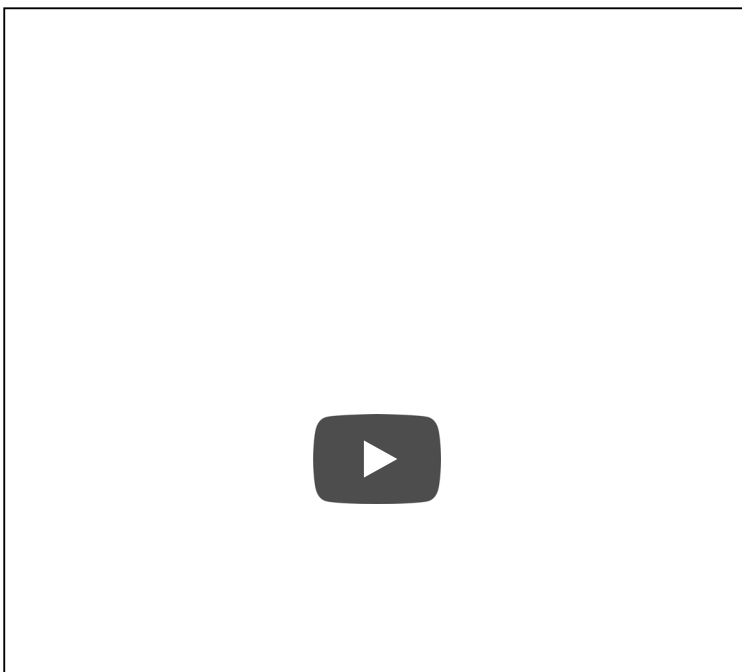
## What kind of trading robot is rofx based on?



According to its website, "RoFx is a revolutionary automated forex trading robot based on neural network." As mentioned before, the automated trading platform Rofx is a Forex trading robot based on a neural network.

## Is the company rofx a legitimate forex broker?

ROFX's authenticity can be substantiated through its ability to correspond with the best brokerage firms across the US, Asia and Europe. The company is regulated – although not directly – just as its human capital is; licensed brokers who abide by the jurisdictions of concerned authorities.



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## Best Low Risk - High Return Crypto Investments You Should Know

By [ADVFN NEWS](#)

PUBLISHED: 28 May 2021 @ 08:24 | [Comments \(0\)](#) |



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2020 was a year full of surprises. The coronavirus has affected the global financial market, turning almost every financial investment into one of high risk. While many traders and investors flocked to cryptocurrencies seeking superior returns, some have shunned away from them due to the market's high volatility. Consequently, there has been a dramatic increase in the need for low-risk, high-return crypto investment throughout 2020 and 2021.



## One such reliable investment in 2021? – RoFX

### Understanding RoFX

RoFX is a trading expert advisor (EA). As a trading robot, it is automated based on a self-learning AI which continuously improves itself. Crypto traders do not need to trade the markets actively but rather deposit funds, and the RoFX does the rest – it is the most convenient way of earning passive income. The minimum investment amount required is 0.05 BTC.

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RoFX Advanced Compound

There are five investment

Trial, Easy Start, MoneyMaker, Gold, and VIP. You'll be required to select one lock-in period of 70, 120, 160, 270, or 360 trading days for all these categories. This means that you will not withdraw your BTC until the lock-in period elapses. Note that the higher the lock-in period, the higher the returns on investment.

With the Advanced Compound trial period, the performance fee you incur is 50% of the profits, 40% for Easy Start, 25% for MoneyMaker, 15% for Gold, and 5% for VIP.

The most significant advantage of the RoFX Advanced Compound package is that profit compounding by default without updating the trading period.

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RoFX Basic packages

The RoFX Basic Trial package has a lock-in period of 30 days, while the Basic Easy Start package has 70 trading days lock-in period. For the Basic MoneyMaker, Gold, and VIP packages, you can select lock-in periods of 70, 120, 160, or 360 trading days.

The performance fee is calculated based on the total profits. For the Basis Trial package, the performance fee is 50%, 40% for Easy Start, 25% for MoneyMaker, 15% for Gold, and 5% for VIP.

RoFX No Lock packages

With this package, you can deposit BTC and withdraw any time you want. Unlike the Advanced Compound and Basic packages, there is no lock-in period. However, the performance fee is a bit higher compared to the other two packages. The No Lock Trial package incurs a performance fee of 60%, 50% for the Easy Start, 35% for the MoneyMaker, 25% for Gold, and 15% for the VIP package.

What separates RoFX from other EAs out there?

RoFX is a breath of fresh air when compared to other EAs in the market. Firstly, you do not have to go through the hassle of downloading and setting up any trading software. All you do is deposit your funds with RoFX and let it do the trading. Your only responsibility is to decide when to withdraw your funds.

Secondly, RoFX is entirely transparent. You can track your real-time portfolio performance since the RoFX trading data is available on Myfxbook. Myfxbook is a professional automatic verification system that tracks RoFX trading performance, demonstrating real-time trading and verified results.

Thirdly, your BTC is 100% secure in RoFX. RoFX doesn't use leverage in its trading. This ensures that if the markets go sideways, any potential downsides are significantly mitigated. More so, RoFX has a loss coverage guarantee fund. This is meant to protect you if there are slippages during trading sessions and the trading balance goes negative. The team behind RoFX has gone to extraordinary lengths to ensure that your funds are protected and that you have peace of mind.

Finally, RoFX is a 'No loss trading robot.' This means that the inbuilt stop-loss mechanism blocks trading at minimum loss.

How much can you earn through RoFX?

Based on historical averages, the daily profit generated by RoFX is 0.38%. In 2020, the aggregate return on investment generated by RoFX was 93.97% for about 70,000 active users.

RoFX publishes up-to-date trading reports. These reports break down trading performance by year, month, and daily.



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It also has a profit calculator you intend to invest in

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Here's an example. As we mentioned, the minimum investment is 0.05 BTC. Enter the amount in the calculator, select your preferred trading period, and then hit the 'Calculate Now' button.

Basic Trial	Advanced Compound Trial	No Lock Trial
<b>0.05285000 BTC</b>	<b>0.05710529 BTC</b>	<b>0.05532000 BTC</b>
TOTAL BALANCE IN 30 TRADING DAYS	TOTAL BALANCE IN 70 TRADING DAYS	TOTAL BALANCE IN 70 TRADING DAYS
Daily Profit: 0.00009500 BTC	Daily Profit: 0.00001050 BTC	Daily Profit: 0.00007600 BTC
Monthly Profit: 0.00092500 BTC	Monthly Profit: 0.00033500 BTC	Monthly Profit: 0.00259600 BTC
Trading Period: 30 trading days	Trading Period: 70 trading days	Trading Period: No Lock Period
Performance Fee: 50%	Performance Fee: 50%	Performance Fee: 60%

The profit calculator then populates and compares the potential profits for the Basic, Advanced Compound, and No Lock packages.

The results show the daily and monthly profits in BTC for all three packages. It also indicates the trading period and the performance fee in each package.

Finally, RoFX provides the ultimate experience for BTC investors. It is the best way to earn passive income for those seeking low-risk and high-reward.

<https://rofx.net>

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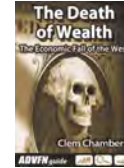
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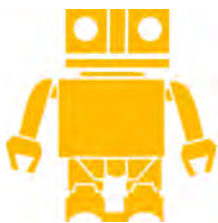


## BEST FOREX ROBOT TESTS

My [Best Forex Robot and Expert Advisor testing](#) process is thorough. I take a deep dive into the live and demo accounts of MT4/MT5 compatible products and draw conclusions based on statistical analysis. I provide a full comparison table with trading statistics drawn directly from Myfxbook, and FX Blue accounts.

### Best Forex Robot Rankings 2022

Here you can find [my personal EA tests](#), to help you decide which Forex robot is best for you. I am currently testing hundreds of different expert advisors, and I'm always adding more accounts to my servers. The [tests are fair](#), running default robot settings, on the recommended broker. Some of the tests have ended up in blown accounts, which have been abandoned, but these are still available for your perusal.



RANK ↓	ROBOT ↓	REVIEW ↓	GAIN ↓	MONTHLY GAIN ↓	DRAWDOWN ↓	DEPOSIT ↓	BALANCE ↓	DAYS ↓
1	 Forex Fury	Review	<b>904.96%</b>	10.595%	19.395%	\$5000	\$38905.39	892
2	 Forex Fury (Test 2)	Review	<b>678.51%</b>	12.987%	21.55%	\$3000	\$23235.97	654
3	 Forex Steam	Review	<b>532.24%</b>	10.54%	18.56%	\$1000	\$632246.15	1758
4	Forex Flex EA (default)	Review	<b>301.34%</b>	7.72%	21%	\$4826.54	\$19097.38	1347

RANK ↕	ROBOT ↕	REVIEW ↕	GAIN ↕	MONTHLY GAIN ↕	DRAWDOWN ↕	DEPOSIT ↕	BALANCE ↕	DAYS ↕
5	Free Forex Robot (Fiverr)	Review	<b>67.51%</b>	6.1%	39.57%	\$645.55	\$1056.91	334
6	GPS Forex Robot (Test 2)	Review	<b>213.664%</b>	4.272%	83.81%	\$10000	\$32003.59	752
7	Forex Diamond	Review	<b>78.1%</b>	1.15%	29.33%	\$1000	\$1780.96	1517
8	Trade Explorer	Review	<b>47.02%</b>	11.73%	54.19%	\$10000	\$14701.73	154
9	Forex Gump	Review	<b>26.35%</b>	26.35%	51.46%	\$1000	\$1263.51	26
10	Arbitron EA	Review	<b>21.81%</b>	7.26%	35.81%	\$5000	\$6090.62	863
11	Wallstreet Forex Robot	Review	<b>10.17%</b>	0.63%	10.26%	\$500	\$550.87	0
12	Hamster Scalping EA	Review	<b>8.47%</b>	8.46%	10.98%	\$99.98	\$108.45	45
13	Forex Truck	Review	<b>5.35%</b>	2.71%	5.34%	\$1000	\$1053.53	59
14	Grandmaster Forex Robot	Review	<b>4.66%</b>	1.01%	8.07%	\$5000	\$5229.08	137

RANK ↕	ROBOT ↕	REVIEW ↕	GAIN ↕	MONTHLY GAIN ↕	DRAWDOWN ↕	DEPOSIT ↕	BALANCE ↕	DAYS ↕
15	Ganon Forex Robot	Review	<b>-15.08%</b>	-10.39%	38.52%	\$100	\$0	2203
16	1000Pip Climber	Review	<b>-46.54%</b>	-15.92%	9.87%	\$3076.76	\$0	571
16	Earth Robot	Review	<b>-26.81%</b>	-11.57%	1.32%	\$5000	\$3659.73	2426
17	Odin Forex Robot	Review	<b>-54.78%</b>	-46.62%	48.19%	\$1000	\$452.19	418
18	Siphon X	Review	<b>-63.8%</b>	-10.58%	70.31%	\$12900	\$5224.38	276
19	Titan G27	Review	<b>-63.45%</b>	-6.83%	68.29%	\$9996.86	\$4417.85	560
20	Forex Robotron	Review	<b>-98.69%</b>	-66.46%	99.52%	€200	€133.63	120
21	Vader Forex Robot	Review	<b>-99.9%</b>	-23.81%	92.31%	\$19062.09	\$0	1103

Note: The stats are updated hourly. We are adding more robots and EA's regularly, stay tuned!

- 100% verified live myfxbook accounts
- Proven to win on every pair
- 93% winning percentage
- Up to 10 trades per day
- Compatible with all MT4/MT5 brokers
- Works with all brokers



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Just like the results table, the best Forex robot & EA video is updated every few months. I base these ratings on the data from the table, as well as on current and future performance projections.

Our analysis of what makes a best Forex EA is based upon 7 significant categories highlighted in Myfxbook trading accounts.

- . **Gain** – we are only interested in systems that are showing a steady gain in overall account size. Accounts don't have to reach thousands of percentages in order to qualify, as we are content as long as the accounts are consistent.
2. **Monthly Gain** – in terms of monthly profit percentages, anything over 3-5% is acceptable. Many robots will naturally start to produce less and less profit over the years. So, it's important for us to analyze the gain, the monthly gain, and also the recent history. If a robot produced all of it's best numbers 5 years ago, then we will often advise against it.
3. **Drawdown** – the drawdown is incredibly important because it's the easiest number to use in order to determine the risk level of a robot. For example, if the drawdown is 65%, this means at one point in time the software had -65% in open trades. This doesn't mean that it resulted in a loss, but it does mean that in the future the software can potentially hold large losses open. The closer this number gets to 100%, the riskier it is. Generally, a best Forex EA will have a drawdown below 50%, if not even lower.
4. **Account Length** – it's important to know how long a robot is active. Many robots will arrive on the scene with incredible gains in a single month, and then disappear. In the last few months, we've been going through all our expert advisor reviews, removing many Myfxbook accounts that crashed. There were over 50 accounts that came out of the gates with a high-risk approach and lost all of their funds within a

few months time. So, it's imperative that vendors provide multiple accounts, showing both long-term and short-term success. If you purchase a robot on just 30 days of evidence, you are taking a risk.

- 5. **Risk/Reward Ratio** – we always analyze the risk/reward ratio of every expert advisor or robot we test. In doing this, we look at the average win, average loss, best trade, and worst trade all in pips. Obviously, depending on the strategy of the robot, these numbers will vary, so a trader's personal preference comes into play here. We have no issues with large risk reward ratios, as long as the win rate is very high.
- 6. **Profit Factor** – the profit factor is a number that's been used in testing robots for many years. Basically, it specifies how many times the sum of all the winning trades exceeds the sum of all the losing trades. If this number is high, you are generally looking at a top performing robot.
- 7. **Average Trade Length** – not as important as many of the other categories, but another great indication of how an expert advisor trades. If you prefer short trades, then you will want to see the average trade length below 24 hours. If you prefer long trades, then you can see this number extended to weeks or even months if you appreciate the long game.

There are more categories and specifications we could go on about, but these 7 we selected are very helpful in understanding what every trader should be looking for in an automated trading software for MT4 or MT5. We have a similar process breaking down how we analyze each of our reviews too, which can be found in our about us section of the website.

Best Forex Robot Reviews (Most Recent)

We have reviewed thousands of robots over the years. This review table is comprised of all of these reviews, and can be sorted or filtered for your perusal. To start, all of the robots are sorted by date, so you can see what’s new in the market. While we appreciate the advanced technology that new products provide, that doesn’t mean they are always the best. Often, old expert advisor strategies are more profitable, especially if they are updated frequently.

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IMAGE	TITLE	SUMMARY	CATEGORIES	DATE
	1000 Pip Climber System Review (Myfxbook)	1000 Pip Climber System is a 100% rule based Forex indicator “designed for success.” The ...	Expert Advisor Reviews, Forex Indicators	December 23, 2021
	Forex Truck Review (\$277 EA)	Forex Truck is a new expert advisor being advertised as “your reliable truck on the ...	Expert Advisor Reviews	December 23, 2021
	EA Indicator Review: Forex Gump	Today I’m reviewing a new system that can be used as an indicator or a ...	Expert Advisor Reviews, Forex Indicators, Forex Robot Nation	December 21, 2021
	Renko Scalper EA Review (NewsFX, Pro)	Renko Scalper is an automated robot provider offering multiple products including the Renko Scalper Pro ...	Expert Advisor Reviews	December 18, 2021
	EA Review: Forex Fury	Forex Fury is the future of automated trading. I’ve been running Forex Robot Nation for ...	Expert Advisor Reviews, Forex Robot Nation	December 15, 2021



IMAGE	TITLE	SUMMARY	CATEGORIES	DATE
	Forex Steam Ten Review	Forex Steam, is one of my favorite creations. This trading robot is fresh and new ...	Expert Advisor Reviews, Forex Robot Nation, Forex Software	December 14, 2021
	Grandmaster Expert Advisor Review (TraderNick)	The Grandmaster Expert Advisor or Forex Robot is an automated trading system "designed to adapt ...	Expert Advisor Reviews	December 8, 2021
	GPS Forex Robot 3 Review	GPS Forex robot 3 is the latest update to Mark Larsen's automated trading software. Mark ...	Expert Advisor Reviews	November 1, 2021

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### Robot Testing Conditions

All best Forex robot tests are run on a Forex VPS, the Forex Robot Nation team finds that results are much more consistent, and positive when using a Virtual Private Server. This also allows you to turn your computer off when you trade.

If you have not started using a Virtual Private Server for your trading, go to our review page above, get a coupon and read our easy Forex VPS set up guide to find out how easy it is to start.

Forex Robot Trading can be difficult if you don't have the right product (best Forex robot). As a Forex trader, you need to have the right expert advisor, at the right price, and we offer this with our reviews. Currency Trading is an art, if you want the profits and the pips at a low risk then you need the right software. Here at Forex Robot Nation we do everything in our power to make sure you get access to all of the best automated trading systems.

We are always adapting our reviews and processes as we look for the Best Forex Robot and expert advisors based on current market conditions. So, if you are a a Forex trader interested in Forex robot trading then you need to look at some of top systems we have selected. They are low risk, priced low and are easily accessible, even for new traders.

## Conclusion

Do you need more **Best Forex Robot** information? Feel free to click on and check out our full expert advisor reviews or go to the official websites of each vendor. We are always looking to discuss these **Forex Robots** and add new systems that are performing well so send us an email and we can help you find the best forex robot.

There is a lot that goes into our testing process. In the beginning stages of Forex robots, we really never had the same level of technology that we do have now, so there's been a very positive shift. This makes backtesting very difficult because the majority of popular commercial systems are all relying on live trading data. This makes demo testing and live testing extremely important. The only issue with this approach, is that we need to trade a system for quite some time before we have enough of a sample size to rely on.

Our testing process will only grow more and more complex as the years pass by, but this is a good thing. This allows us to look at many different robot strategy elements and find ways to ensure that the community is only dealing with systems that can securely grow their investments.



Home » RoFx Review – Is This Expert Advisor Profitable in 2021?

## RoFx Review – Is This Expert Advisor Profitable in 2021?

By Space Coast Daily // July 15, 2021



The financial crisis in 2008 has disrupted the global economy, with markets trembling down across the globe. But the aftermath of this crisis had the greatest silver lining as world-changing tech companies like Facebook, Uber, Instagram, Square, etc were born. RoFx is one such company with technology and innovation at its core.

This fintech company was established in 2009 and had been offering reliable Expert Advisor services for traders and investors across the globe.

With over a decade of presence in the EA industry, RoFx proved to be the best among the lot. The RoFx bot is very well known for making huge profits for its users while keeping the risk under control. Unfortunately, there won't be any regulatory bodies that certify trading bots like RoFx, but we found that this company has many reputed and

regulated brokers as its partners.

According to their official myfxbook account, the RoFx bot has made gains of over 1352% for its users in the past three years

### What is RoFx?

RoFx is a company that offers [Expert Advisor services within the Forex market](#). Unlike many algorithmic trading robot companies, RoFx is user-friendly and trustworthy.

As a result, it can be considered a one-stop Forex solution that is completely automated with zero human interference required. According to their website, over 50k active clients are making a constant flow of passive income using the RoFx bot.

The bot currently trades two major Forex pairs – EUR/USD and GBP/USD. With an investment of as low as \$1000, you can sign-up with RoFx and let the bot take over your account.

Users do not have to install any complex trading software on their PCs as the entire platform is online. Also, you don't have to know anything about Forex trading or the working of bots to get started with RoFx. More so, the company claims to have a reserve fund to cover the losses made by the bot in any adverse scenario.

### **RoFx EA's Unique Selling Proposition**

Most of the Forex automated trading robots fail because of their saturation after a certain point in time. The Forex market is dynamic, and it keeps changing with time.

The pre-coded set of rules in the bot won't work on the market after a certain period as the encoded strategies in them get outdated. Contrary to this, the RoFx algorithm comprises a self-learning neural network with advanced artificial intelligence programming.

Also, the team behind RoFx keeps feeding the bot with many updated strategies so that the bot is on par with the ever-changing market conditions. This fundamentally differentiates RoFx from its competitors. The makers of RoFx are confident in the bot to an extent where they promised to completely cover all the losses made by the bot using a reserve fund.

### **What Makes RoFx One of the Top Contenders in The EA Market?**

#### **■ Credibility**

As mentioned, RoFx is a pioneer in offering reliable Expert Advisor services. They have offices in the USA, London & Hong Kong with verified addresses.

RoFx has partnered with reputed brokers who are completely regulated in their respective jurisdictions. As of June 2021, the RoFx bot is being used by over fifty thousand clients across the globe. Their myfxbook account is completely verified with exceptional results. All of these should explain the credibility of RoFx.

#### **■ Safety**

Your funds with RoFx are extremely safe because of their loss coverage guarantee. Also, the bot uses robust risk management principles to cut down the losses immediately in case of any news releases or unexpected volatility.

Furthermore, RoFx doesn't use any leverage while trading and has accurate stop-loss orders in place. Also, the company doesn't collect any personal information other than the most basic ones, and even the info collected is passed through an SSL connection to avoid any data leaks.

#### **■ Profitability**

RoFx has launched their brand new 'Platform V 2.0' recently, and they claim to generate an average daily profit of over 0.97% instead of their 0.38% in their 'Platform V 1.0.'

This is a huge leap in the EA industry as generating close to 1% profit per day with almost zero risks is commendable. Also, RoFx's V 2.0 packs belong to their Advanced Compound package. Therefore, the performance fee is relatively cheaper here while having the choice to select the lock-in period.

For instance, if you were to invest \$10k in the RoFx Platform V 2.0 and choose the lock-in period to be 360 days, with a daily profit of around \$350 and a monthly profit of about \$4,350, your initial capital would have grown to \$135,925 with a 1260% growth rate.

These figures might seem illogical to you, but that is the power of compounding. The same can be observed in the screenshot below.

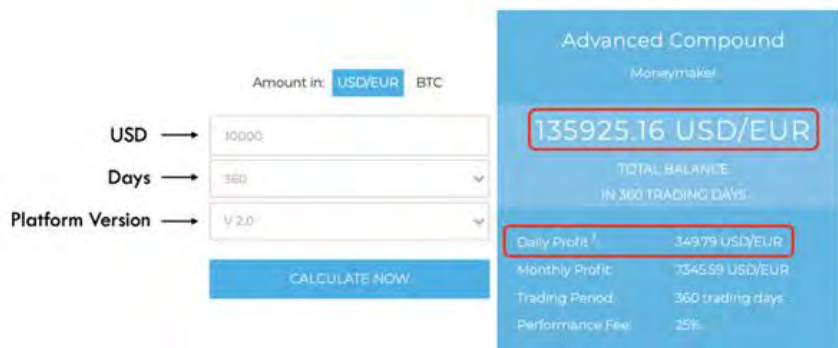


Image Credits – RoFx Calculator

■ **Convenience**

You don't need any financial background to get started with RoFx. The makers have made the usage of RoFx extremely simple so that any individual can take advantage of their bot to make consistent passive income. Everything from the Setup process, deposit methods, withdrawal procedures to the UI, UX and customer support of RoFx reflect great convenience.

■ **User Anonymity**

RoFx was the first-ever EA provider to accept Bitcoin deposits. They also hardly collect any personal information during the sign-up process, which supports the anonymity factor.

**Notable Considerations**

The primary consideration that we came across is the high-performance fee charged by RoFx. In their initial packages (Trial & EasyStart), the fee goes beyond 50%, which we find expensive. But considering the reliability they offer and the fact that their team makes money based on how much money they make for you, that price could be justified. Also, this consideration is just for Platform V 1.0 and not for V 2.0.

**Conclusion**

All in all, RoFx is a proven EA service with an exceptional track record. With multiple packages to choose from, RoFx offers flexibility for novices along with deep-pocket investors in creating a source for constant passive income. After a comprehensive analysis, we strongly recommend the RoFx EA service. We were especially impressed with their partnerships with reputed brokers and their loss coverage guarantee policy.

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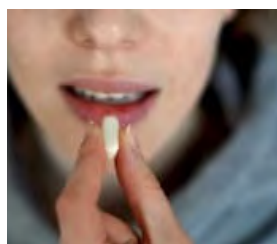
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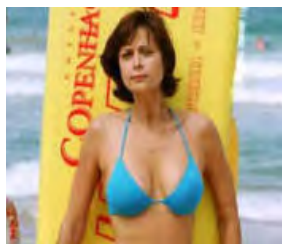
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# Exploring the Top Five Forex Robots of the Year in 2021

DEC 23, 2020, 5:06PM

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There are some forex robots that have proven to be a trader's best friend, helping them amass fortunes through automated trading.

The Forex robot space can be a tough space to navigate through. There are of course other forex robots that promise substantial profits, only to disappoint their users in the end. The worst-case scenario is when users use their invested amount altogether in the pursuit of profits using such fraudulent forex robots.

Luckily there's a wealth of information available online that can point in the right direction. If you are one who is [looking for the best forex robot to increase your chances of profitability and](#)

## Factors to choose to make sure you get the right forex robot

You need to consider the following factors before choosing the right forex robot.

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1. **Thorough testing:** The Expert Advisor or robot you choose has to be tested against variable spreads and real slippage before they can be usable. You should also consider backtesting to get the results. It should be available to you before making the final judgment. In this case, third party data from authoritative sites such as myfxbook can help evaluate these robots.
2. **Using a demo account:** Testing a robot in a virtual environment before taking it to the real market and risking your money, should be another consideration when selecting robots. You should note that test environments do not always mimic real conditions. Regardless, it still helps you give a measure of what the fx robot has to offer.
3. **Drawdown:** A low drawdown is always preferable. It refers to the reduction and decline of capital. Conversely, higher drawdowns can mean higher gains, but can also expose an account to unnecessary levels of risk.

## Avoiding Scams of Forex Robots

When looking for forex robots, always be aware of products that claim to produce a significant gain or those who cannot provide any real-time based evidence. User reviews are a good source, but you have to make sure that they are genuine. There are many scam products on the market. So you should always lookout for the red flags. These include things like, withdrawal problems once you have deposited, profits not adding up, the robot behaving in a way not advertised, and others.

Luckily there are services such as myfxbook available, which work well to evaluate the effectiveness of forex trading robots. Always go for forex robots from developers you can trust and whose background has been clearly mentioned. Developers should always be transparent with

← Exploring the Top Five Forex Robots of the Year in 2021

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## 2021's Top Forex Robots

*Below are some of the best forex robots for 2021.*

1. **ROFX:** Developed by a team of expert developers and forex traders, RoFx has carved a reputation over a decade as being one of the most consistent forex robots in the market. Its main driving force is its artificially driven neural network that adjusts with ease of changing market conditions. Another striking feature of this robot is their compensation plan which is facilitated by the robot's reserve fund. Its verified myfxbook page of one of their accounts shows a gain of 811.29% with a mere 0.35% drawdown. This suggests that the AI-driven strategy is one of the safest in the market.

**Minimum Deposit: \$1000**

2. **GPS Forex Robot 3:** GPS Forex Robot is a user-friendly forex robot, with its 3rd version currently in operation. It constantly updates itself to changing market conditions, using innovative algorithms. It allows users to select from twelve different trading styles and strategies, each catering to a specific style or trading level.

Win/Gain Rate: Their website claims that they produce 300% gains, which is backed up by live verified records.

**Minimum Deposit: \$100**

3. **WallStreet Forex Robot:** The WallStreet Forex Robot is a forex robot that comes with an amazing feature called "Broker Spy Module" which was developed after 2000 hours of testing. The robot also provides a verified myfxbook account which indicates a profit in the region of 155% with a drawdown of 21.17%. Users actually get 4 robots for the price of one, which includes Wall Street 2.0, Asia 2.0, Pro 2.0, and Gold Trader.

**Minimum Deposit: \$1000**

4. **Perfect Trend System:** The Perfect Trend System is a forex robot that focuses on profiting from trends. The robot first retraces and then rides the continuation of strong trends the system selects. The robot's myfxbook page indicates a gain of 840.53% and a drawdown of 58.30%, making it one of the highest advertised gains on this list. Since the drawdown is high, the strategy in use may be inherently risky.

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5. **Forex Cyborg:** This is a professionally developed forex robot that allows users to trade on multiple currency pairs with default settings. It also lets them adjust risk per trade and lot size to an amount suitable to their trading style. It is backed up by ten years of historical testing. One of their verified myfxbook accounts shows a gain of 310% with a drawdown of 29.27%.

Minimum deposit: \$1000

## Final Thoughts

It should be remembered that no forex robot performs at the same level in different market conditions. Because of the vast availability of forex robots, the number of scams in the market has increased. This means that traders have to be diligent more than ever. They must conduct research using the wealth of information available in the market, as well as based on testimonials and hard evidence from other users. Picking the right forex robot can change the fortune of many traders, especially novice traders and individuals looking for passive income. A good monthly gain of 10 to 15% is an achievable profit level which some good forex robots maintain. But always steer clear of forex robots that promise unachievable gains under all market conditions.

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COIN

LAST PRICE / CHG.(%)

₮	<b>Tether</b> USDT	<b>\$1.00</b> ▼ -0.0001471 (-0.01470%)
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Bitcoin

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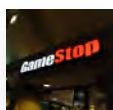
	ETH	▼ -128.08 (-4.02%)
	Bitcoin Cash BCH	\$361.20 ▼ -20.10 (-5.27%)
	ChainLink LINK	\$27.09 ▲ +0.3134 (+1.17%)
	Binance Coin BNB	\$423.50 ▼ -16.20 (-3.68%)
	Cardano ADA	\$1.13 ▼ -0.06003 (-5.04%)
	Tronix TRX	\$0.06320 ▼ -0.003477 (-5.21%)
	Litecoin LTC	\$126.13 ▼ -5.06 (-3.86%)
	Dogecoin DOGE	\$0.04441 ▼ -0.001127 (-2.48%)
	Decentraland MANA	\$2.77 ▼ -0.1770 (-6.00%)
	Power Ledger POWR	\$0.6067 ▲ +0.1148 (+23.33%)
	EOS EOS	\$2.68 ▼ -0.1335 (-4.74%)
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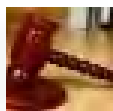
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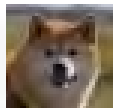
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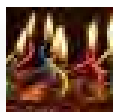
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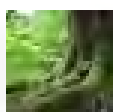
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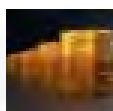
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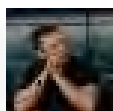
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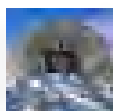
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## RoFx EA Review (Benefits & drawbacks)

This time we are doing a RoFx EA review in this article. And we are highlighting the most important parts, features, and settings of this innovative EA. So, if you were looking for the best review of the RoFx EA, you are in the right place! Keep reading until the very end of the post to find out everything you need to know before getting and working with this EA. Can we add the RoFx EA to our [Best EA](#) page?

## What is RoFx EA?

This RoFx EA review will be quite different. Because this time, we encounter a robot that operates with artificial intelligence while trading. It is a 100% automated software. If you have been in this industry for some time now, you must have heard about it before. You don't pay for the Robot itself, you pay a fee for the performance of the EA, and this company has a loss coverage policy. And some professional traders say the RoFx EA is the best expert advisor launched to date.

Also, we found some particularities around this Robot, all of them positive, of course. As we mentioned, this EA trades using artificial intelligence, as well as very specific mathematical algorithms. So, these two combined work as a money-making machine that will make your account and profits skyrocket.

The developers of this EA are so confident with the Robot they created that they give a return of funds. But keep in mind that it might not even happen, as the probability of drawdown while using this Robot is super low. This EA is super revolutionary because it is based on a neural network, excluding the influence of the human emotional factor.

## RoFx EA Features

We will study the most important key features in this part of the RoFx EA Review.

It shows Signal for new trades available.

This EA has a loss coverage guarantee.

It is based on the neural network.

RoFx EA works with innovative mathematical algorithms.

It has a profit consistency feature while trading.

It is a fully automated software.





This robot has no leverage.

It provides minimum risk while trading.

## Who is behind RoFx EA?

We are giving you the information in this part of the RoFx EA review, about the team that works behind this amazing Robot. We will also have a look for their names, location, and trading experience.

This time on the official website, the vendor provides information about them. This Robot was made since 2009 by a group of successful Forex traders and developers. And quite sometime later they decided to sell the Robot online. But firstly they did a lot of backtesting with their own money. So they could ensure it worked perfectly fine with all the innovative features they implemented.

The headquarters of the RoFx EA is located in the United Kingdom, Miami, and Hong Kong. So you can already imagine the success they have had since day one! But, the only thing they don't give is the names of the creators and developers of this Robot.

## RoFx EA Trading Strategy

For this part of the RoFx EA review, let's reveal what you need to know about the performance and overall trading strategy. You don't need any experience to be successful with this Robot. Either you are an expert or a beginner; you will get good profits with the RoFx EA. Since this EA launch in 2009, it has steady profits daily. And the monthly gains go from 8% to 10%, depending on the currency pair you decide to trade.

You can check the results from the Myfxbook account they offer to find the performance of the Robot. All backtesting made with real money from the creators. Also, these developers are so confident with their method that they give a guarantee of return if you lose money. So, you can be sure you will only make profits while operating with it.

The risk while trading is only 0.38%, no matter the package or pair you are using. And it is fully automated. So don't have to spend hours sitting in front of a computer to gain money.

It trades only with the EURUSD and GBPUSD pair. These two might be the only downsides while using this Robot. Because it is expensive, you get the security of your funds by the company. They also fully cover the losses of the Robot.





## Trial

- USD 1,000- 5,000.
- 30 trading days.
- Daily trading profit: 40%
- Performance fee: 60%

## Easy Start

- USD 5,000-10,000
- 70 trading days.
- Daily trading profit: 50%
- Performance fee: 50%

## Moneymaker

- USD 10,000-50,000
- 270 trading days.
- Daily trading profit: 65%
- Performance fee: 35%

## Gold

- USD 50,000-100,0000
- 270 trading days.
- Daily trading profit: 75%
- Performance fee: 25%

## VIP

- USD 100,000- Unlimited
- 270 trading days.
- Daily trading profit: 85%
- Performance fee: 15%

## VIP PAMM\*

- USD 10 million- Unlimited
- No trading period.
- Daily trading profit: 85%
- Performance fee: 15%

## Clients' Review

On their website, there is also a small section where you can find the clients' feedback. Everyone seems to be satisfied with the overall performance of the Robot and has over 8.0 satisfactions out of 10 from 193 clients. All of them are very thankful for having a service so user-





## Pros:

The developers guarantee the safety of your funds & all coverage of losses.

You can fund your account using Bitcoin, USD, or EUR.

It has 100% confidentiality.

The beginner won't get any trouble for their start.

This EA provides daily profit with minimum risks.

It provides 24/7 customer support.

## Cons

All the packages offered are incredibly expensive.

It trades only on four major currency pairs. These are EURUSD and GBPUSD

The EA needs USD 1000 to start trading.

## RoFx EA Review Conclusion

We have got to the end of our RoFx EA review article. Overall, this EA is user-friendly and a great choice for traders. But of course, it is really expensive. And we know most new traders don't have this amount of money to invest right away. But, if you do, you get loss coverage. If somehow you are not happy with it. Also you can read other ea reviews on [our website](#) off course.

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90% SUCCES RATE

BEGINNER FRIENDLY

FREE SUPPORT





.....

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### RoFx EA Review

This time we are doing a RoFx EA review for [our website](#). And as always we are highlighting the most important parts, features, and settings of this innovative EA. So, if you were looking for the best review of the RoFx EA, you are in the right place!

And don't forget to check out our entire blog, our team is always updating it with new reviews of the latest [best forex robots](#)! So, let's dive into the RoFx EA review already!

### What is RoFx EA?

Today our RoFx EA review will be quite different. Because this time, we encounter a robot that operates with artificial intelligence while trading. And it is also a 100% automated software. If you have been in this industry for some time now, you must have heard about it before. And some professional traders say the RoFx EA is the best expert advisor launched to date. So, you can already imagine how insane it is!

As we mentioned, this EA trades using artificial intelligence, as well as very specific mathematical algorithms. So, these two combined work as a money-making machine that will make your account and profits skyrocket. But, that's not the end of it. The RoFx EA has another incredible feature: complete fund of the losses while trading. Yes! Exactly what you heard! The developers of this EA are so confident with the robot they created that they give a return of funds. But keep in mind that it might not even happen, as the probability of drawdown while using this robot is super low.

So you can already imagine how good of a robot it is!

### RoFx EA Features

Signals for new trades available.



Profit consistency while trading.

Fully automated software.

Stable passive income.

Money safety.

No leverage.

Minimum risk while trading.



## Who is behind RoFx EA?

In this part of the RoFx EA review, we are giving you information about the team that works behind this amazing robot. So, we will look for their names, location, and trading experience.

This time, the vendor provides information about them on the official website. And it says this robot was made since 2009. So, a group of successful Forex traders and developers created this automated trading system. And quite sometime later they decided to sell the robot online. But firstly they did a lot of backtesting with their own money. So they could ensure it worked perfectly fine with all the innovative features they implemented. And so far, since launch, this robot has only good positive reviews and incredible performance.

The headquarters of the RoFx EA are located in the United Kingdom, Miami, and Hong Kong. So you can already imagine the success they have had since day one! But, the only thing they don't give is the names of the creators and developers of this robot.

## RoFx EA Trading Strategy

For this part of the RoFx EA review, let's disclose all you need to know about the performance and overall trading strategy. So, as the developers say on the official sales page, you don't need any experience to be successful with this robot. And it doesn't matter if you are an expert or novice, you will get good profits with the RoFx EA.

Since the launch of this robot in 2009, it has steady profits daily. And the monthly gains go from 8% to 10%, depending on the currency pair you decide to trade.

In terms of the performance of the robot, you can check the results from the Myfxbook account they offer. All backtesting made with real money from the creators. Also, these developers are so confident with their method that they give a guarantee of return if you lose money. So, you can be sure you will only make profits while operating with it.



while using this robot. Because, as it is expensive, you get the security of your funds by the company. And they also fully cover the losses of the robot. So if you think about it, it is a win-win situation! As there is no risk while investing in this robot.

## RoFx EA Client 's Feedback

Here for the RoFx EA review, we decided to investigate further online to find real reviews and feedback from customers. And luckily, all we found is incredible. On many websites, this robot has over 8.0 satisfaction out of 10 from clients. And all of them have said that even making the smallest deposit, they have good profits every month. But, the satisfaction is not only for the profits. The people said that the customer support of this robot is incredible. And you can e-mail them or even call one of the offices, they will answer. So far, everything about the RoFx EA is positive!

## EA Packages/Prices

For this section of the RoFx EA review, we will be disclosing all about the packages and prices available to purchase this EA. And also the minimum investment you need to operate with every package.

So, there are five different packages available to purchase. And all of them have very different prices.

### Advanced Compound Trial

Initial deposit: USD 1.000-5.000

Trading days: 270

Performance fee: 50%

Your share in the daily profit: 50%

### Advanced Compound Easy Start

Initial deposit: USD 5.000-10.000

Trading days: 270

Performance fee: 40%

Your share in the daily profit: 60%

### Advanced Compound Moneymaker for BitCoin

Initial deposit: USD 10.000-50.000

Trading days: 270

Performance fee: 25%

Your share in the daily profit: 75%

### Advanced Compound Gold

Initial deposit: USD 50.000-100.000

Trading days: 270

Performance fee: 15%

Your share in the daily profit: 85%

### Advanced Compound VIP



Your share in the daily profit: 55%

## EA Pros & Cons

### Pros

Live verified results from Myfxbook.

The developers guarantee all coverage of losses.

You can fund your account using Bitcoin, USD, or EUR.

Traders can choose the payment method that suits them best, ranging from USD dollars or even Bitcoin.

### Cons

All the packages offered are incredibly expensive.

It trades only on four major currency pairs. These are EURUSD and GBPUSD

## Conclusions RoFx EA Review

We have got to the end of our RoFx EA review article! What do you think so far? For us, this EA is a great choice. But of course, it is really expensive. And we know most new traders don't have this amount of money to invest right away. But, if you do, you must check it out! It won't disappoint you. Because it has been going strong for over 9 years in the market!

## Best Forex Robot

100% Auto Trading

24/7 Support

Standard, Advised Settings

Tested and Proven Strategy



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## Rofx EA Review 2021

For today's article on the [best ea forex](#) website, we will be doing a Rofx EA review. As always we compiled a lot of useful information together so you will get an amazing review.

Are you interested right? Keep reading until the very end of the post to find out everything you need to know before getting and working with this EA. And you will see if we put the Rofx E.A. on our [Best Forex Robots page](#).

## What is Rofx EA?

Rofx EA is an automated trading robot like many others we have studied in our reviews. But, what makes it so different and innovative? Why does it stand out from the rest?

In this Rofx EA review, we found some particularities around this bot, all of them positive, of course. You don't pay for the bot itself, you pay a fee for the performance of the EA, and this company has a loss coverage policy. So your transactions are protected in case you don't feel satisfied with the product.

You may be wondering, how can I get it then? Easy! Just go to the official website and register your actual Forex account to start trading. After that and choosing the perfect package for you, you will get trading signals generated by the robot, and by the end of the day, you receive profits. That's it!

As we said before, this EA is super revolutionary because it is based on a neural network, excluding the influence of the emotional human factor. This way you can just relax and do other things while the bot is doing all the hard work.

Are you as intrigued as we are? Keep reading our Rofx EA review to find all the details about this EA!

## Who is behind Rofx EA?

Thankfully, for this Rofx EA review, we found actual information about the creators on their website. These developers created the bot in 2009 and tested it in the market using their own money, and finally, in 2010 the EA started making good profits. You can use this ea also for using some off the [Best Crypto Signals](#).

So far, the number of successes is bigger than the losses. Later, they decided to launch the bot's signals to the public so everyone could make investments.





## Clients' feedback

On their website, there is also a small section where you can find the clients' feedback. Everyone seems to be satisfied with the overall performance of the bot and are very thankful for having a service so user-friendly with amazing customer support available when needed.

## Rofx Trading Strategy

Before diving in, for this Rofx EA review we must state this EA is one of the few who are on myfxbook. This page tracks the performance of EAs showing real-time trading and verified results. So, you can check on your own all trading results shown on their site are real.

This trading system operates with many currencies, such as EURUSD, GBPUSD, USDJPY, USDCHF, AUDUSD, and USDCAD. It also supports BTC.

Daily profit is 0.38% and you will be able to gain over 10% monthly, depending on the package you are using, your plan, and the strategy implemented.

To start trading with Rofx EA just register your Forex account on their site, choose a package and fund your account. As easy as that.

The developers say everyone will benefit tremendously from this EA because it is so easy to use. No matter if you are a beginner or an expert, this will be a great investment.

Although the bot is 100% automated, you can study and analyze the trades and data, you get full transparency during the whole process.

## Rofx Packages/ Prices

For our Rofx EA review, we found it interesting that this EA has way too many choices for packages for their customers to choose from. On the official website, you will find Basic Packages, No Lock Packages, and Advanced Compound packages.

After studying all of them and their operational settings you just have to select the one that is most convenient for you. So, to make it work you just need to open a free account or log in. This EA doesn't involve a withdrawal fee, you pay for the performance fee of the bot. But, you need to deposit at least USD 1,000 into your account to make it work.

However, a good thing is the developers have a loss coverage policy case you are not satisfied with the overall performance of the product. If you saw our latest [Forex Gump EA review](#) article you will see that the pricing off forex robots can be totally different.

You can use any of the different packages in many currencies, such as USD, EUR, and BTC. Just choose the one that adapts the best to your strategy and your budget to start trading right away.

Basic Packages

Trial

USD 1,000- 5,000.

30 trading days.





USD 5,000-10,000

70 trading days.

Daily trading profit: 50%

Performance fee: 50%

#### Moneymaker

USD 10,000-50,000

270 trading days.

Daily trading profit: 65%

Performance fee: 35%

#### Gold

USD 50,000-100,0000

270 trading days.

Daily trading profit: 75%

Performance fee: 25%

#### VIP

USD 100,000- Unlimited

270 trading days.

Daily trading profit: 85%

Performance fee: 15%

#### VIP PAMM\*

USD 10 million- Unlimited

No trading period.

Daily trading profit: 85%

Performance fee: 15%







#### Pros

- They guarantee the safety of your funds.
- Reserve funds in case of negative results.
- 100% confidentiality.
- Loss coverage.
- Easy start.
- Daily profit.
- Minimum risks.
- Deposit security guarantee.
- 24/7 customer support.

#### Cons

- All packages are quite expensive.
- The EA needs USD 1000 to start trading.

## Conclusions Rofx EA Review 2021

Overall, we find this Rofx EA review to be positive. So far, there is no red flag around this EA, we believe it's very trustworthy hence the transparency of the developers and the good reviews online.

The bot is user-friendly and you don't have to purchase a package for a lot of money upfront. After accessing their server you just choose the most adequate offer that adjusts to the results you are looking for. And, if somehow you are not happy with it, you get loss coverage. So there is nothing holding you back to make this decision!

What do you think? Would you invest your money in this bot? Let us know your thoughts.





FULLY OPTIMIZED SETTINGS

24/7 SUPPORT

WORKS ON SPECIFIC PAIRS ONLY

PREMIUM FOREX STRATEGY COMBINED WITH ALGO TRADING

This Forex Robot is currently our favorite. Off course because off the High Accuracy which generates nice profits. But mostly off the Proper Risk Management they are using.

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## TMCNET FEATURE

June 25, 2020

# ROFX Review - A Reliable Automated Trading Tool

By [Special Guest](#)  
[Alizay Mark](#)

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The modern forex market is almost saturated with tools and robots which provide automated trading facilities to their clients. This has paved the way for a growing number of a novice as well as experienced traders to enter into this highly profitable market. A good example of an automated forex robot would be ROFX. ROFX is regularly included in compiled lists of the [top forex robots lists](#) in trading circles around the world. This review will aim to find out why.

ROFX is one of the best known automated trading robots for forex and provides guaranteed coverage of losses. Created in 2009, ROFX has since carved a reputation, assisting numerous traders to make fortunes starting from 2010. They have given even novice traders the opportunity to enjoy the fruits of successful forex automated trading, even those without any formal trading experience or technical knowledge.

ROFX has a number of experienced and qualified developers on its team. Since beginning operations, ROFX has opened offices across different countries. They currently have three offices located in London in the UK, Miami in the USA, and

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one in Hong Kong as well.

### Benefits of Trading

Clients of ROFX have many reasons to trade using ROFX in the forex market. Some of them are highlighted in brief below.

- **Preventing The influence of Human Emotions:** ROFX strictly implements specific algorithms which it uses in its automated trading process. This prevents traders from manually trading on the market, especially if they're under any emotional pressure such as stress, greed, anger, etc.
- **It's Novice-Friendly:** The forex market is a complicated landscape for many to navigate. It requires special knowledge, the ability to analyse the markets, and experience in a live trading environment. However, traders using ROFX do not need these. While there is a small percentage of novice traders who earn profits in forex, using ROFX EA increases those chances by manyfold.
- **Consistency:** Clients of ROFX can achieve consistency in trading if they use ROFX properly.
- **Efficient Trading Strategy:** ROFX uses proven trading strategies that are profitable under live trading conditions. Traders can thus skip their trial and error approach and trade in a more disciplined and organised way.
- **Automation:** Manual trading has its limitations, especially the need to invest substantial human hours on the actual trading process. By using automated trading robots like ROFX, users do not have to directly involve themselves in trading and can devote the extra time towards other activities.

### Some Standout features of ROFX

- **Daily Profit:** ROFX users can earn a daily profit at the end of each daily trading session if the day is profitable.
- **Easy Start:** Starting to trade with ROFX EA is pretty easy. Users can start trading with a trial short-term investment for the next 30 trading days.
- **Deposit Security guaranteed:** The Reserve fund of ROFX is regularly amended to ensure the utmost deposit security for its users.
- **Minimum risk level:** ROFX markets itself as a "no loss forex robot" and provides a stop-loss system for stopping trading when the loss is at a minimum.
- **Transparency:** ROFX does not charge any hidden fees. All expenses are detailed on the official website.
- **Return of Funds:** Traders can recover their invested funds anytime.
- **24/7 Support:** ROFX provides customer support for its users on a 24/7 basis with an option for live chat.

- **No leverage:** ROFX does not work with any leverage. It uses only its own funds for trading as well as funds from customers.

### Trading Record of ROFX on myfxbook


For potential users of any Expert Advisor or forex robot, it becomes a crucial practice to check the authenticity of any claims made by Expert Advisors, especially when it comes to their profitability. A good way to do this is to check for statistics from live trading accounts, hosted on an authoritative, third-party site such as myfxbook.

In ROFX's case as well, we shall examine the account stats provided by them on myfxbook. The screenshots are attached below.

Both the trading privileges and the track record can be confirmed by the information provided in the tab above the chart. In ROFX's case, it is a real account using the Ester broker. The tab at the bottom left corner also indicates that this chart has been updated recently, providing evidence that this is indeed an updated chart. This proves that the records are indeed genuine and the user is not being presented some made up screenshots.

When going over the statistics we can see that this particular account had an initial deposit of \$10000000.00 and currently has a balance of \$55780486.00. The profit hence made on this account is \$45780486.00. This particular account has equity of 100% which is always a favorable statistic to have. The daily and monthly profits of this account is at 0.26% and 8.07% respectively. This account overall has gained 457.8% with an impressively low drawdown of 0.35%.

Another aspect that is important to highlight on this account is the enormous growth it experienced within a relatively small period. It has produced a profit of 46.52% already this year, as indicated below.

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All other aspects of this myfxbook account seem fine, including other trading charts, trading activity, and the advanced trading statistics available. One of the biggest priorities of ROFX is providing transparency and it certainly does not disappoint when it comes to the myfxbook account statements. Only open orders and open trades are not revealed.

**Conclusion**

Many people tend to include ROFX in the list of top fx expert advisers lists that they come up with and for good reason. The EA has shown itself to be reliable, developed, and produced by a credible team of developers, with proven track records to show. In the above review, we've taken a look at their myfxbook page as well which further gives evidence to the reliability and credibility of this EA. However, Users have to be aware that this EA cannot be downloaded. Instead, users can create an account for free on the official webpage, after which he/she will be redirected to the payment packages available.

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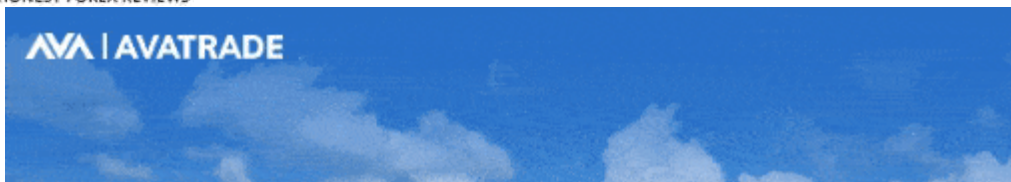
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## RoFX Review

In this post I will be reviewing the RoFX.net automated forex trading system. The RoFx service was created by a team of software developers and traders who are located in London. The developers have published results on the RoFx website since 2009. They allow you to participate in automatically trading the forex markets without any previous trading experience required.

### What is RoFx?

RoFx is an automated trading system. Automated trading involves a piece of software that has been specifically developed to scan the markets for trading signals based on a built-in algorithm. When it finds these signals, the software can place and manage trades on behalf of the user.

This means that traders of all experience levels can effectively trade the market hands-free. Therefore, you don't require years of experience learning how to trade

## Top Forex Brokers


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TRADE! REV

**IG**



★★★★★

TRADE! REV

**IC Markets**



★★★★★

TRADE! ^

online but of course should still be aware of the significant risks involved.

RoFx does all of the hard work by conducting detailed market analysis 24/7 to try and identify potential trade setups. They have a premium exclusive coverage of losses feature using reserved funds for unprofitable days. The start deposit is claimed to be secured by the reserve fund. You can find out more details about this process on the official RoFX.net website.

## RoFx Performance

Since 2009, RoFx boldly claims to have accumulated an impressive profit of over 800%. Myfxbook is the professional automatic verification system that tracks the RoFx trading performance, demonstrating real-time trading and verified results. However, the developer states that Myfxbook tracks only one of more than 100 RoFx accounts. According to them, accounts execute the same deals, trading on diverse volumes.



RoFx Trading Reports

## RoFx Trading Strategy

RoFx is very easy to get started with. You simply register your managed forex account, the RoFx forex robot generates fully automated trading signals, these forex signals are then reproduced on your account.

The trading implemented into RoFx is based on neural networks (AI – self-learning) which can allow it to learn from



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**Forex FI EA**





the market as it progresses and helps to ensure that it can keep up to date with the ever-changing market conditions.



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The self-learning neural network to ensure that not only do the RoFx robots continue to work tirelessly, but they also learn at the same time. It means that the robots know more about trades this year than last year, or even last week.



**Forex Scalping EA**



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The automation helps to ensure that human emotions do not have a negative impact on your trading and that the trading plan is always adhered to.

Deep within the algorithm, RoFx uses a combination of the Elliot wave trading principles and Ichimoku analysis, these are amongst other technical and fundamental factors considered by this unique automated forex trading system.

The principles of the Elliot wave have been around since the 1930s and are still relevant in Forex trading today. It is a type of technical analysis used to study market cycles and then forecast market trends, using a wide range of factors such as investor psychology and highs and lows in prices.

The Ichimoku Cloud is a technical analysis method that was created by Japanese journalist Goichi Hosoda in the late 1960s. The Ichimoku chart shows support and resistance levels, as well as other essential information such as trend direction and momentum. Compared to standard candlestick charts, the Ichimoku Cloud contains more data points, increasing the accuracy of forecast price moves.

The Ichimoku Indicator includes many lines and information that may be complicated for inexperienced traders to understand. However, RoFx conducts this complex analysis behind the scenes fully automated.

Inside the self-learning system lay algorithms which analyse charts and information in many ways to choose the most profitable and least risky trading strategy.

Trading reports are available in your account everyday where you can see all transactions history.

## Get My Free Forex Robot!

Sign Up Now to get my forex robot.  
\*Please use a real email address as you will be sent the download link\*



The screenshot displays the RoFX user interface. On the left, there is a sidebar with 'ACCOUNT INFORMATION' showing available balances for USD (0.00), EUR (647.35), and BTC (1.23098600). Below this is a 'CREATE PACKAGE' button and account ID details. The main area is titled 'TRANSACTIONS' and contains a table of recent trades. A navigation menu on the left includes options like Account, Invoices, Internal Transfer, Withdraw Money, and History.

Time	Amount	Payment Method	Details
Feb 21, 2018	EUR -10.25	Bank Transfer	50,00% Performance Fee for Package ID [redacted]
Feb 21, 2018	EUR 20.50	Bank Transfer	Profit from Package ID [redacted]
Feb 21, 2018	BTC -0.001476	Bitcoin	40,00% Performance Fee for Package ID [redacted]
Feb 21, 2018	BTC 0.003690	Bitcoin	Profit from Package ID [redacted]
Feb 17, 2018	EUR -5.25	Bank Transfer	50,00% Performance Fee for Package ID [redacted]
Feb 17, 2018	EUR 10.50	Bank Transfer	Profit from Package ID [redacted]
Feb 17, 2018	BTC -0.000756	Bitcoin	40,00% Performance Fee for Package ID [redacted]
Feb 17, 2018	BTC 0.001890	Bitcoin	Profit from Package ID [redacted]
Feb 16, 2018	EUR -4.00	Bank Transfer	50,00% Performance Fee for Package ID [redacted]

Email

Name

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RoFx Transactions

## How does RoFx Work?

As explained above, RoFx is a fully automated way to trade forex online. The process to get started is as follows:

1. You register your managed forex account
2. The RoFx robot generates trading signals
3. These trading signals are automatically copied to your trading account
4. You receive any profits there may be at the end of the day

The simplicity of the RoFx service makes it easily accessible to users of all experience levels. However, this does not mean that it is suitable for everyone. It is imperative to make sure that you have a clear understanding of all the risks involved with trading online. Never ever trade with more than you can afford to lose and keep in mind that past performance is by no means any guarantee of future results.





RoFx Sign-Up Process

You can withdraw your available balance any time. The minimum withdrawal amount is 1,000 USD/EUR. Lesser amounts can be withdrawn in BTC by using an option “Exchange” in your account menu. In case you make a withdrawal when your package has expired, bank commission is paid by the company. In case of a non-expired package withdrawal, bank commission is paid by the recipient. RoFx doesn’t charge any commission from withdrawals.

## RoFx Packages

There is a good variety of packages available to choose from on the RoFx website. You can opt for the package that is the most convenient for you and your trading goals. The packages vary according to the deposit required, duration, profit share, performance fee, etc.

Package	Amount	Creation Date	Trading Days Left
Easy start	BTC 0.90000000	Nov 17, 2017	14
Easy start	EUR 5,000.00	Nov 16, 2017	14

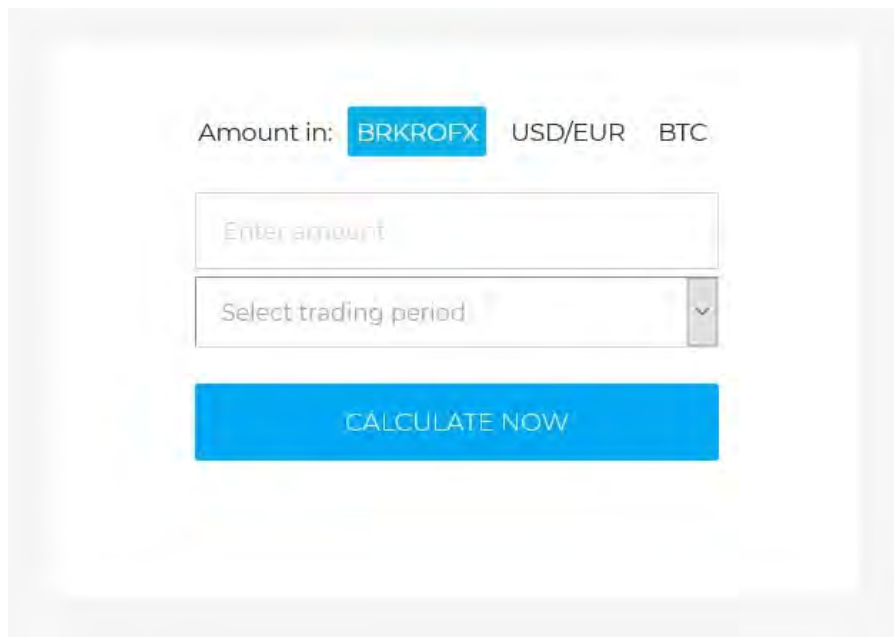
RoFx Packages

- **Advanced compound package:** profit compounding by default without updating the trading period – add funds option do not roll over trading period of package
- **Basic packages**



- **No lock packages**

There is a profit margin calculator on the RoFx website where you can experiment with different inputs including packages, duration and value.



RoFx Profit Margin Calculator

## RoFX Customer Feedback

This quote was kindly provided by the RoFx team from a client: *"They validated my account within 1 hour. I decided not to put all eggs in one basket and got Easy start with 0,9 BTC and 5000 Euro Easy Start. BTC transfer took like 30-40 min. I saw my account funded surprisingly fast, that really surprised me, cause when I used another similar service, money transfer was like pain in the ass. So I know what I'm talking about! Bank transfer took 5 days but it is pretty normal. They covered bank commission by adding it to my account."*

## RoFx Conclusion

As with any form of investing or trading online, you should do your own due diligence with the RoFx automated forex trading solution and see if it is something for you.

There is full support provided and trading reports available on the RoFx website along with an abundance of frequently




asked questions.

You can get started with any account balance and even signup for a free account if you wish to trial the service with virtual funds before committing. RoFx does not demand any special documents for collaboration. The only document you are to submit is copy of your Driver's License or ID in order to validate your account.



RoFx Application Form

There are no downloads required to get started and getting setup is a relatively easy process, taking just 5 minutes. Just go careful if you are considering this and make sure you fully understand how it works.

RoFX	\$0
	 216





FUNCTIONALITY

6.5/10



USABILITY

6.5/10



VERSATILITY

6.5/10



### FEATURES

- Account Shown Since 2009
- Fully Automated
- Free Sign Up
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[VISIT ROFX REVIEW WEBSITE](#)

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## News

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### Rofx Review

Welcome again to [our website](#). There are many traders interested in the operation of bots that automate their strategy in the Forex market. That is why we bring the Rofx Review to guide and clarify the doubts of all those interested.

First-hand it has been known that Rofx is one of the most transparent, safe, and effective [Forex Robots](#) on the market. Since its start of operations in 2009 with its capital and its rapid generation of profits in 2010, Rofx has captivated the attention of the most expert traders.

IF you are immersed in the world of trading and want to form your criteria about this Expert Advisor (EA), our Rofx Review will provide you with the information you need. Knowing the prices and packages, the pros and cons of this Bot, you will know if Rofx is the robot you are looking for to automate your strategy and earn money safely.

### Rofx prices and packages

Regarding prices and packages, Rofx provides certain advantages to its clients, knowing that it applies withdrawal fees, but for the performance of the bot. This Forex Robot has a great variety of packages and options that adapt to all budgets, adapting to any client's strategy and currency pairs, such as EURUSD, GBPUSD, USDJPY, USDCHF, AUDUSD, and USDCAD.

For this Rofx Review, we do explain the packages that Rofx offers its clients:

**Trial** – It consists of a deposit in the account of between 1,000 and 5,000 USD, to obtain 30 days of use of the Bot. Set a Daily trading profit of 40% and a Performance fee of 60%.

**Performance fee** – Requires an initial fund of between 5,000 and 10,000 USD to start enjoying the service for 70 days. This package establishes half profits, establishing a Daily trading profit of 50% and a Performance fee of 50%.

**Moneymaker** – It consists of a budget of at least 10,000 to 50,000 USD, to obtain 270 trading days. In this package, commissions begin to tilt in favor of the client, establishing a Daily trading profit of 65% and a Performance fee of 35%.

**Gold** – Set up initial deposits of between 50,000 and 100,000 USD to enjoy 270 trading days just like the previous package. Here the Daily trading profit is higher, being 75%, with a Performance fee of 25%.



Daily trading profit of 85% and a Performance fee of 15%. The advantage of this package over the previous one is the unlimited time of use of the EA. They also offer [Forex Telegram Signals](#).

Take in count the following – the greater the amount of money to operate the lower the Performance fee... And of course, the greater the number of trading days for the use of the Trading Robot.

## What to expect from this Forex Robot?

Transparent and guaranteed transactions can be expected from the Rofx Expert Advisor. Some users describe in their Rofx review, both software and web portal are an easy-to-use bot with good results. In myfxbook, you can check the performance of this Forex Robot and verify its results and performance in real-time.

## Why is this Forex Robot different?

Two factors make the difference in this Forex Robot. The first is its easy use and the start of operations since it is enough to log in with the real Forex account, choose the package according to the budget and deposit the funds. Three really easy steps.

The second factor is providing security to your clients' funds through loss coverage, in case clients are not satisfied with the bot's performance.

## Is Rofx EA safe?

Something that traders are extremely concerned about is the security of their capital and the operational risk of entrusting their strategy to a Forex Robot. In this case, Rofx is one of the most reliable and secure EAs, guaranteeing the security of its clients' funds, establishing loss coverage policies, and providing 100% confidentiality of the data.

As described by its clients, Rofx is a reliable and transparent software that, despite being 100% automated, allows the review of processes and data constantly.

## Rofx Pros

Among the Rofx pros, much emphasis has been placed on its loss coverage policies. It is known that the company establishes reserve funds in the event of negative results and a loss coverage in cases of customer dissatisfaction with the Expert Advisor service. Another benefit of using the Rofx robot are:

- 100% confidentiality of data and transactions
- Minimal operational risk
- Easy use of the platform
- Daily-earnings
- 24/7 personalized attention
- Security guarantee deposit

## Rofx review Cons

Although Rofx is a software that offers a wide range of benefits to its users, it must be said that one of its cons is the cost of its packages. Initially, the package to start trading "cheaper" requires a deposit of 1,000 USD, so this Forex Robot could be more for traders with large capital to operate.

Maybe, if you are a novice trader and with little investment capital, Rofx does not fit your budget as much, let's say that this EA is aimed at traders with more experience and knowledge of Trading and especially more capital.



operation in its loss coverage policies and easy use of the platform. In general, this Forex Robot seems to be a great option to automate strategies for those traders with a long history and large capital to trade.

All user reports aim to be reliable and transparent software, positioned as one of the bots with efficient results and minimal risk in trading. Always before choosing an EA that automates your strategies, it is important to analyze if it adjusts to the budget you have, especially when the packages are as expensive as those of Rofx. Although of course, the cost of the packages is offset by great benefits.

## Best Tested Robot 2020

100% Automated Trading

NO Emotions

Working Strategy

Proper Risk Management

Standard Optimised Settings

We are testing each month many Forex Expert Advisors(robots) and most off them are “not so good”. But This one we are also using several months now with succes. Created by Real People with a working Strategy. Watch the video to see everything in action.

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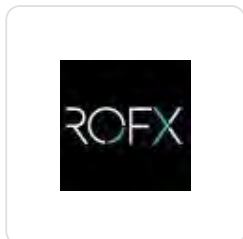
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# RoFx.net

Get Full Access

## Description

RoFx is the team of software developers and traders with significant trading experience. In 2009, we created the robot and tested it at the world currency market by trading with our own funds. Since 2010, RoFx has been showing positive dynamics. This means the numb... [Read More](#)

Headquarters: 10 Lower Thames St 4th Fl, London, Greater London, EC3R 6AD, United Kingdom

Website: [www.rofx.net](http://www.rofx.net)

Employees: 27

Revenue: \$5 Million

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## Industry

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### RoFx.net's Tech Stack

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By

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Apache HTTP Server

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Apache Corporation



Microsoft Exchange Online

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Cloudflare Security

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### RoFx.net News & Media



#### The Investing Online Report - ROFX to go Public in 2021: Announces IPO - Warren Buffett Interested?

Austin, TX , Oct. 24, 2020 (GLOBE NEWSWIRE) -- As per the The Investing Online Report, volatility in the forex market is nothing new as it is regarded as one of the most volatile markets in existence. The global forex market is an ideal place for traders who like volatility, which makes the perfect opportunity for ROFX technology users to profit.

Oct 24, 2020 | [www.globenewswire.com](http://www.globenewswire.com)



#### The 2018 World's Best Forex Robot Leads

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of 93%. Read the full press release at <http://www.releasewire.com/press-releases/the-2018-worlds-best-forex-robot-1139198.htm>

Feb 5, 2019 | [www.releasewire.com](http://www.releasewire.com)

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\$634 Million

### Frequently Asked Questions regarding RoFx.net

#### Where are RoFx.net's headquarters?

RoFx.net's headquarters are in 10 Lower Thames St 4th Fl, London, Greater London, EC3R 6AD, United Kingdom

#### What is RoFx.net's official website?

RoFx.net's official website is //www.rofx.net

#### What is RoFx.net's Revenue?

RoFx.net's revenue is \$5 Million

#### What is RoFx.net's SIC code?

Leads



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#### What is RoFx.net's NAICS code?

RoFx.net's NAICS: 523130,5231

#### How many employees are working in RoFx.net?

RoFx.net has 27 employees

### What is RoFx.net's industry?

RoFx.net is in the industry of: Brokerage, Finance

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The technologies that are used by RoFx.net are: Sectigo, Apache HTTP Server, Microsoft Exchange Online, Cloudflare Security

### From which companies the people who are visiting RoFx.net's page are from?

The people who are visiting RoFx.net's page are from: [Curative](#).

[See more information about RoFx.net](#)

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› MONEY (/MONEY) › MANAGING YOUR MONEY (/MONEY/MANAGING-YOUR-MONEY) ›

ROFX REVIEW: SAFE AND TRUSTED WAY FOR STEADY PASSIVE INCOME

## RoFx Review: Safe and trusted way for steady passive income



## What Is RoFx?

**RoFx is a well-known automated trading system designed and created by experienced traders and software developers in 2009.**

The profitable forex robot was opened to the public and provided consistent good trading results since 2010. It offers an average monthly return of 10% on its traders. You can earn passive income with its assistance, resulting from the investment made by you. RoFx allows the users to monitor the robot's trades which makes it a transparent company. The fully computerized and AI-driven EA provides an impressively low drawdown. The best part is that the company compensates for the losses of the traders with its reserve fund. This is why financial forums are filled with positive feedback on RoFx (<https://forexeatop.com/rofx-review/>), and we will justify those with an honest review.



Automated forex trading refers to using EAs or robots for trading on a specific asset. A trading robot can be used as an indicator to point out when to buy or sell, but it can also execute trades independently with no human interaction. While most forex robot sellers claim their system to be profitable, only a few of them are truly capable of generating profits. You need to keep in mind that financial markets change fast. An EA can only be called reliable if it can deliver good performance under all market conditions because this is what most robots fail to accomplish.

## **How does it work?**

An EA is generally installed within the MetaTrader Software's experts' directory. The trading software can open or close trades according to the set algorithm and it can work entirely automatically on the set inputs. Traders can have the benefit of the backtesting feature on a demo account to see whether the automated trading system works or not.

## **Scams of forex robot**

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Since the beginning of the trading era, traders have had to deal with scams in every sector of financial markets. Especially beginners and inexperienced traders are easily conned as they get tempted by “Get rich quick” and “Earn with 0 afford” schemes. Numerous trading robots are available out there that give assurance of 100% return or more within a month. However, the reality is far from that. These robots are not able to produce even 10% and they can wipe your account off money eventually. Most of the EAs are poorly programmed. As a result, they do not consider the factors like market conditions and inconsistency of the market during trading.

## **Pros and Cons of automated forex trading**

### **Pros**

- Brilliant source of passive income
- Greater risk management with stop loss and take

- Elimination of any emotions
- Fully automated trading handled by the EA
- No need to be a trading expert
- Backtesting result within minutes
- Irrelevance of loss of internet connection

## **Cons**

- Some EAs neglect economic and political news
- Some EAs work without a stop loss

## **Is the company legitimate?**

The fintech company RoFx has offices in multiple locations like the US, the UK, and Hong Kong. The head office of the company is in the UK where you can visit anytime with an appointment. The company also has an annual conference that is specially arranged for VIP clients. However, an average client may also attend the conference by making a request to the support team.

---

RoFx is a software company and it develops AI. Hence, it is not required to be regulated. However, the company is linked with top brokerage firms in America, Europe, and Asia. This is enough proof that RoFx is a legitimate company.

## **Why RoFx? Why not other EAs?**

Although there are many forex trading robots in the market, the process of automated trading offered by RoFx is on a whole different level than the rest. All you need to start is depositing your money and the robot takes care of everything. You can deposit in Euro, US dollars, and Bitcoin. Unlike other trading robots, RoFx does not have hassles of installation and customization of settings. Important features of this robot include –

1. **Easy:** The service can be accessed via the RoFx website. The company offers profitable packages for low-performance gees. The base package offers a minimum of 50% of daily profit and it increases up to 95% as the investors increase their investment. With this easy-to-use interface, anyone can invest efficiently without any knowledge about forex.
2. **Intelligent:** RoFx is consistent in offering profitable trades and has continued to do so without a fail for the last ten years. The self-learning neural network installed in the robot helps it scan the charts and information on the markets continuously so it can be more profitable. You only need a computer and a handful of cash to use this fully automated process.
3. **History:** The performance of RoFx for the last ten years is great proof that the EA is profitable. You can see the robot's daily profit and monthly gains on the official site of the robot. These results are verified by Myfxbook, which is a well-known forex site for displaying any trading account's history.
4. **Risk-free environment:** Traders will never lose their money while trading with forex. At Myfxbook, you can see a monthly analytics chart that shows the algorithm's performance of RoFx through all these years. As displayed in the results, you will not see any month that is in the negative, which is enough proof of the system's skilled and efficient functionality. Even if a trader suffers from loss, the company backs it up by the company's reserve fund so the trader does not lose any money. Most trading robots use risky strategies on the account and do not trade with stop loss and it results in blowing up the money of the client. RoFx, however, uses stop loss. Moreover, it uses no leverage.
5. **Responsive customer support:** Helpful and responsive customer support is very important for the traders, but most famous trading robots like Odin, GPS, and Hamster Scalping neglect this fact. On the contrary, RoFx offers customer support 24/7 via email and live chat.

## More information about RoFx

As mentioned earlier, RoFx does not require download and installation. To access its services, you need to visit the website and register an account. Then, you can deposit some money in the account and the robot is ready to go. Keep in mind that you will have to deposit a minimum of \$1000 to start trading. The robot's work can be monitored by logging in. You can also determine future gains by using the profit calculator.

---

RoFx offers easy withdrawal services with a minimum cash out of \$1000. If you want to withdraw an amount lower than \$1000, you will have to use Bitcoin using the exchange option in the account menu. The company does not charge any withdrawal fee, but the bank charges a commission if the user chooses to draw out money after the package is expired. The good thing is that this fee is paid by the company. Therefore, you can withdraw your money whenever you want.

Deposit options are also straightforward as the users can put their cash easily with their credit cards, bank transfer, and Bitcoin. Domestic ACH is available for US customers as well.

## **Conclusion**

The problem with most trading robots in the market is that they offer great results for a certain period but fail to keep up the performance for a long time. The ridiculous claims of the robots to give you 200% monthly gain are



Case 1:21-cv-23472-RNS Document 64-2 Entered on FLSD Docket 02/14/2022 Page 236 of 236  
meaningless with little to no backtesting history. Novice traders are easily fooled by these scammers. RoFx, however, provides the traders with a clear and straightforward concept through an easy-to-use user interface. Daily gains made by the robot, verified records of Myfxbook, and 24/7 customer support show the credibility of the robot. The 8%-10% monthly gain offered by the robot is enough to make any professional trader happy.

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# Exhibit 3 - Articles Promoting RoFx IPO

### Articles discussing the Initial Coin Offering (ICO) or Initial Public Offering (IPO)

1. October 15, 2020, *One More IPO Marked By Berkshire Hathaway. Unveiling AI Forex-Advisory, RoFX.*, Seeking Alpha, <https://seekingalpha.com/instablog/46612006-johnny-fr/5509042-one-ipo-marked-berkshire-hathaway-unveiling-ai-forex-advisory-rofx>
2. October 23, 2020, *Why You Should go for the ROFX IPO. Spoiler: Warren Buffett May Take Part*, published by ABC Money, <https://www.abcmoney.co.uk/2020/10/23/why-you-should-go-for-the-rofx-ipo-spoiler-warren-buffett-may-take-part/>, written by Claire James
3. October 24, 2020, *The Investing Online Report - ROFX to go Public in 2021: Announces IPO - Warren Buffett Interested?*, written by Investing Online's John Pruglos and published by Yahoo, <https://www.yahoo.com/now/investing-online-report-rofx-public-204900250.html>
4. October 30, 2020, *RoFX's Upcoming IPO Is Grabbing the Attention of Buffett's Berkshire Hathaway*, AP NEWS, <https://apnews.com/press-release/kisspr/technology-business-virus-outbreak-corporate-news-lung-disease-34ae8fb6641de989246cd22e7ba9b785>, by KISSPR.
5. December 3, 2020, *ROFX IPO Grabbing Headlines: Warren Buffett's Berkshire Hathaway Interested*, <https://marketbusinessnews.com/rofx-ipo-grabbing-headlines/253125/amp/>.
6. December 21, 2020, *RoFx to go Public in 2021: Warren Buffett's Berkshire Hathaway Interested*, written by guest and published by Deadline News UK, <https://www.deadlinenews.co.uk/2020/12/21/rofx-to-go-public-in-2021-warren-buffetts-berkshire-hathaway-interested/>
7. December 23, 2020, *RoFx To Go Public in 2021: Warren Buffett's Berkshire Hathaway Interested*, THE GOOD MEN PROJECT, [https://goodmenproject.com/business-ethics-2/rofx-to-go-public-in-2021-warren-buffetts-berkshire-hathaway-interested/?\\_cf\\_chl\\_managed\\_tk\\_\\_=pm...](https://goodmenproject.com/business-ethics-2/rofx-to-go-public-in-2021-warren-buffetts-berkshire-hathaway-interested/?_cf_chl_managed_tk__=pm...), by Shahbaz Ahmed
8. December 31, 2020, *Warren Buffet Gets Interested in the Upcoming IPO of ROFX*, Home Business Mag, <https://homebusinessmag.com/money/forex-trading/warren-buffet-gets-interested-upcoming-ipo-rofx/>
9. August 6, 2021, *The Upcoming IPO of ROFX Snatches the Attention Warren Buffett*, Coindoo, <https://coindoo.com/the-upcoming-ipo-of-rofx-snatches-the-attention-warren-buffett/>, by Helen
10. January 31, 2021, *Rofx Announces IPO Following Remarkable Growth*, Coinfomania, <https://coinfomania.com/rofx-announces-ipo-following-remarkable-growth/>, by PR Desk

Seeking Alpha 

# One More IPO Marked By Berkshire Hathaway. Unveiling AI Forex-Advisory, RoFX.



Oct. 15, 2020 9:07 AM ET



**Johnny Fr's Blog**

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Due to consistent variability in the stock market today, Robinhood traders are accelerating their investment operations by leveraging the unpredictability for amplified gains. Thus, with increased volatility, forex markets are experiencing an aggressive invasion by eager individuals. Reports suggest that pre-IPO investment is already in the works for the company's clients. Since RoFX has been rated among top forex accounts, the investing software has been booked for IPO in the first quarter of 2021. Fintech startup may become an acquisition goal for Warren Buffet's investment conglomerate Berkshire Hathaway according to sources. Omaha investment veteran is growing his



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In 2009, two machine learning enthusiasts decided to put their trading expertise to test. Like all entrepreneurs diving into uncharted territory, [the group introduced their trading robot](#) to the market, which was wholly funded by their own money at the time. To their surprise – and a pleasant one at that – the software performed exceptionally well, prompting them to fully launch it by granting access to the general public in 2010.

A few years later, a group of researchers from three different universities made a statement that would revolutionize the financial industry. They suggested that AI algorithms in the digital era were taking over financial markets. Consequently, manual trading methods have seen a massive decline not only in proportion but feasibility. Because why shouldn't automation be allowed to accelerate trading?

It has allowed RoFX to expand internationally and amass over 50 000 investors and establish roots in China, the US, and England. Naturally, since RoFX deals in software, it is not regulated by financial agencies. However, it works with some of the top-performing brokerage units across Asia, America, and Europe, which are, in fact, under the administration of stringent financial authorities.

## What can clients expect while trading with RoFX?

With an automated trading system that does its clients' heavy-lifting for them, it offers a plethora of compelling benefits. These include round the clock customer support.



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When it comes to financing, RoFX takes into account various categories of users and facilitates them accordingly. In that, their multicurrency approach caters to those trading with traditional formats such as dollars and those trading with Bitcoin. Additionally, easy withdrawal mechanisms had also put into place whereby individuals can withdraw daily profits and initial investments whenever they want. So, lag time is virtually non-existent.

## Ultimate risk management

Instead of leaving users unshielded, RoFX uses its reserve fund to buffer losses. Combined with the Fintech's solid stop-loss strategy, this limits trading if market retractions are unpredicted. While this might seem relatively unconventional, it does solve a lot of problems. Similarly, RoFX stays as far away from leverage as possible even though almost every other robo-advisory service makes use of it. The reason for it all lies in RoFX's exceptional dedication to protecting its clients. In that, leverage exposes traders to potential irrecoverable losses, and this Fintech wants to make sure nothing like that happens. But then how does the company make profits to keep itself running? And how does it grow its customer base?

## RoFX devotes itself to delivering the right solutions

With fast transfers, 24/7 chat support, expert advisory, and self-executing software, the company manages its user's savings through secure means. To safeguard the public



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## How RoFX effectively increases clients' investments?

Algorithm driven trading works wonders, but it is often hard to elaborate on how it operates. However, to make that simple, RoFX trades an active account on MyFxbook. Selling and buying are executed continuously and made visible to anyone who wishes to analyze the workings of a trading account run by AI. These trading statistics also provide sufficient information about RoFX's performance and prove that it can multiply investment earnings for anyone.

Long and short decisions at the right time amplify profits and minimize losses

Reserve fund coverage and transparent performance fee charges

Only 19% of trades lead to losses, and even these are covered through the company's discreet mechanisms

A firm and safe daily average drawdown of 0.38%

## What makes RoFX stand out?

As the financial market's major players are investments from various traders and services offered by robo-advisory companies, these contribute to the market's volatility. Thus, automated trading systems have gained considerable traction. To fill the gap and maximize the opportunity, RoFX has been targeting investors through proactive tactics and an effective software solution. As the Fintech grows, it can be looked at as an



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# Why You Should go for the ROFX IPO. Spoiler: Warren Buffett May Take Part

by Claire James (https://www.abcmoney.co.uk/author/claire-james/)  
— 23/10/2020 (https://www.abcmoney.co.uk/2020/10/23/why-you-should-go-for-the-rofx-ipo-spoiler-warren-buffett-may-take-part/)

The stock market is not the only market that is going for wild swings these days. Like the 'Robinhood trading rush', the clients of forex robo-advisory RoFx enjoy great benefits from the volatility in forex markets today. The service of RoFx is listed first among top forex managed accounts. In the first quarter of 2021, the automated investing software will go to IPO. Based on the company's sources, pre-IPO investment is scheduled for the recent RoFx users.

We can check the trading stats of RoFx published and verified by the reliable community platform, the platform website, feedback of clients, and reviews to understand the future of this fintech company.

## The Story of RoFx

RoFx started its journey in 2009 with a group of forex traders and machine learning developers. The company launched automated trading software (https://www.investopedia.com/articles/trading/11/automated-trading-systems.asp) and started trading with their private capital. Public access was granted to the trading advisory service of the company in 2010. In 2016, the joint research of economists from Sydney University of Technology, Sun Yat-Sen University, and Simon Fraser University quoted "Computerized algorithms trading at superfast speeds is becoming a dominant trading technology for financial markets in the machine age".

Forex trading was executed manually in the past but with AI technology development, it was replaced by automated trading operations. As a result, RoFx was able to reach over 50,000 global clients, according to the information provided by the company. At present, the company has offices in the USA, Miami, and Hong Kong apart from its headquarters in London, UK. RoFX does not require regulations from financial authorities but it cooperates with top-tier European, Asian, and American brokerage and clearing firms. These firms are supervised by reliable corresponding regulators.

An expert reveals that RoFX may go public as the company is the target of Warren Buffet (https://fxaudit.com/rofx-ipo/). It is known that Berkshire Hathaway is currently in the negotiation process to acquire a major stake.

Generally known for a unique conservative investing approach, there are plans of having a pool of various technology investments. These already include Apple, Amazon, Snowflake and probably RoFx.

## Features of RoFX Beneficial for Clients

## User Friendly Interface

It is clear that RoFx is a user-friendly platform (https://www.abcmoney.co.uk/category/world/). Usually, beginners find it difficult to understand the mechanics. However, RoFx advertises itself as easy to initiate and easy to trade. It offers a user-friendly platform that allows users to trade easier. Moreover, due to the self-learning algorithm, forex traders can fund in euro, dollar, or even bitcoin with RoFx. It also allows users to get back to their initial deposit whenever they want and they can withdraw funds daily.

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## Risk Management

A stable Reserve Fund was implemented by RoFx to cover the losses of its clients. The corporate structure is combined with a tight stop-loss system that covers positions at minimal losses. It is different from most robo-advisors that give the trader a buy-and-live-with-it option. Not using leverage is another unusual principle for financial services these days. Most fintech software providers make clients pay extra for full margin and exposure to additional risks. However, RoFx manages to generate cash flow to encourage and support traders and developers.

## Client Oriented

It is not possible to surprise anyone with 24/7 support. However, it is a must to have such an option if the company is entrusted by the customers to manage their savings. Apart from round the clock support and convenient withdrawal procedure, you should note the company reward structure transparency separately. Based on the account type, RoFx charges a performance fee. The Advanced Compound Trial comes with a minimum balance of \$1000 and a 50% performance fee. The Advanced Compound VIP Package starts from \$100,000 and a 5% performance fee. This fee structure is convenient for both beginners and professional traders.

## The Strategy of RoFx to Multiply Your Savings

Usually, it is difficult to understand how AI-controlled trading works. Based on the Myfxbook trading status of the RoFx verified page that updates daily, the key takeaways from the RoFx performance can be highlighted:

- With average daily profits of 0.38%, the losses are covered by the Reserve Fund, which is very impressive and a big reason to charge high performance fees.
- 81% of trades managed by RoFx are profitable.
- The AI trading system can go long and short on major forex pairs. However, better results were displayed in the Brexit environment by shorting the British pound in the United States dollar. Compared to EUR/USD trading, the winning rate in GBP/USD is 2% higher.

## Conclusion

The forex market is crowded by passive income, investment, and robo-advisory software. The majority of professional traders use the in-house automated trading software powered by AI known as black boxes. It is a professional approach to make the black box available for retail investors. Since machine learning is being developed and the demand for automated trading decisions is increasing, the assets under management of RoFx grow, and the business shows the potential to shine.

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# The Investing Online Report - ROFX to go Public in 2021: Announces IPO - Warren Buffett Interested?

## The Investing Online

October 24, 2020 · 5 min read

### What is ROFX



ROFX was started in 2009 by a group of expert software developers and forex traders who were looking to launch an automated trading platform.

**ROFX was started in 2009 by a group of expert software developers and forex traders who were looking to launch an automated trading platform.**

Austin, TX , Oct. 24, 2020 (GLOBE NEWSWIRE) -- **As per the The Investing Online Report**, volatility in the forex market is nothing new as it is regarded as one of the most volatile markets in existence. The global forex market is an ideal place for traders who like volatility, which makes the perfect opportunity for ROFX technology users to profit.

ROFX which is a reputed name among online trading platforms, recently not announced that the company is planning to go public in 2021 via an Initial Public Offering. But the news of this IPO has broken the surface, according to sources familiar with the matter. It may indeed attract a lot of attention from investors, including big firms like Berkshire Hathaway, which is Warren Buffet's firm, according to some reports. If these reports are to be believed, Warren is looking



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others.

The news of ROFX's IPO is certainly encouraging for many investors. They can make a well-informed decision if they take a look at all the features and statistics in detail.



### ROFX: How it began?

ROFX was started in 2009 by a group of expert software developers and forex traders who were looking to launch an automated trading platform. The following year they made their trading advisory service public. As the last few years have seen a major shift from [using traditional manual order execution to automatic trading software](#), it presents a favorable scenario for ROFX to succeed. The platform already has more than 50000 global clients.

The company's headquarters are in London, UK, with registered offices in Both Hong Kong and the USA. According to existing laws, ROFX is a software provider and hence aren't required to adhere to any regulations from authorities. However, as ROFX is always committed to providing transparency, it co-operates with several brokerage and

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RoFX's Upcoming IPO Is Grabbing the Attention of Buffett's Berkshire Hathaway

October 30, 2020

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What Is This About?

RoFX is an expert advisor company with more than ten years of stable presence in the market. Founded in 2009, RoFX proved to be one of the best trading robot service providers for individuals interested in Forex trading across the

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generating profits continuously for its clients. RoFX is now considered one of

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information that it is going public in the first quarter of 2021.

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Buffet's attention

RoFX's IPO is one of the most anticipated events in the financial market for many reasons. After ten years of successful journey, and immense popularity, most of the experts believe that this IPO is going to be a grand success. But there is one reason why there is so much talk about this IPO in financial forums, and that is Buffet's interest. There are talks among market experts that RoFx is going IPO as they have become an interest of Berkshire Hathaway, Warren Buffett's company, that currently negotiates for buying of RoFx majority stock holding. According to the terms of the agreement, Berkshire Hathaway should invest \$ 500 million in AI development that will significantly improve RoFx trading results. This not only increases the interest among the investors but also proves the credibility of the RoFX company.

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Why Should You Be Excited About the RoFX IPO?

Before investing in any company, the fundamentals should be examined because these fundamentals play a crucial role to forecast if the company

great idea. Let's get started.

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over it. It is one of the best sources of passive income, and it is hard to find any reliable source like RoFX. In a post-pandemic situation, people will definitely be inclined towards companies like this as RoFX provides risk-free investment. Also, by looking at the company's impressive trading results experts project an optimistic forecast for RoFX.

Technology

It would be appropriate to say RoFX as a technology company than an Expert Advisor company. We are saying this because of the robust technology used by RoFX to make its robot stand out from the rest of the lot. RoFX robot is embedded with an AI-enabled self-learning neural network that updates its database continuously to adhere to ever-changing market conditions. That is, your trading never gets saturated with RoFX as the robot knows how the market would behave by taking previous references. Also, a team of traders and programmers continuously update the robot with many brand-new strategies that are backtested and proved.

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User Experience

RoFX offers its clients the ultimate user experience. Unlike traditional expert advisors where a hefty software is required to download with a lengthy installation procedure, setting up RoFX is extremely simple. Trust us when we say it doesn't take more than 5 minutes to complete the entire set-up procedure



be taken care of by the robot alone, and all the trading activities that take place

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whatsoever. This is the type of company people would look forward to while making their investments.

Results

Any trading robot’s credibility can be gauged by analyzing the trading results generated by the robot over time. We can say that RoFX is leading the other EAs in the market of the front. Trading results are published on their official website and also on the credible public trading journal – [MyFxBook](#). These impressive results explain how reliable the RoFX robot is and will also give an estimate of how our earnings can be while using RoFX.

Fund Safety

RoFX ensures 100% fund protection for its clients. That is, you can never lose your investments even in the most adverse scenarios. This company uses various risk and money management techniques to ensure client fund safety. Strict stop-loss placements are maintained, and no leverage is used to maximize profits. Also, RoFX has partnered with brokers that are strictly regulated in their respective jurisdictions. Most of all, this company offers negative balance protection for all of its clients. With this, all the losses generated by the robot will be covered by the company from its reserve fund. This makes investing in RoFX the most rewarding yet safest of them all.

The Growth Potential of This Fintech Company

Financial analysts, market experts, and many billionaire investors believe that many businesses will flourish in the post-pandemic situation, and life-changing companies will be born. There

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potential, we can say that RoFX's IPO is going to be nothing less than a trend

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their services, and look forward to the upcoming IPO. Also, irrespective of the IPO, it is essential to lookup for services like RoFX and creates your own passive income so that your personal budget is sustainable and ready for any disaster.

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••• NAVIGATE

Written by [Alexander Joe](#) Published on: 16:49 GMT, December 3, 2020, 16:49

## ROFX IPO Grabbing Headlines: Warren Buffett's Berkshire Hathaway Interested

### What the buzz is about?

The brand name of ROFX is well known in the expert advisor and forex [robot](#) industry. The company has carved out a very good reputation for itself over the ten years of its stable existence. Beginning in 2009, ROFX has quickly [gained exposure as one of the best trading robot service providers](#) in the world, appealing to all individuals interested in making money from forex trading. The company has a 50 000 strong active customer base which stretches all around the world. Numerous expert traders and analysts have commented about ROFX being one of the world's trustworthy and reliable robots, as evidenced by its strong track record of consistent profit generation. It was recently reported in various news portals that ROFX is going public with an IPO in the first quarter of 2021.





## Is Buffet Interested?

It stands to reason that the news of ROFX's IPO is one of the most anticipated events in the market. The IPO is expected to be a great success due to ROFX's successful ten-year journey and immense popularity among traders. However, this IPO is being talked about in various financial forums as well, thanks to interest from Warren Buffet. Many market experts believe that ROFX is one of the targets of the business tycoon's investment firm, Berkshire Hathaway. The firm could acquire a massive stack in the company. According to the terms of the agreement, a \$500-million-dollar investment is expected from Berkshire Hathaway, which would be focused on AI development. This can really boost ROFX's trading results. The news of this interest not only increases interest among investors but is also a testament to the reliability of the brand.

## Reasons to be Excited About this IPO

However, excited about investing in a company, one should always examine the company's fundamentals as it plays a crucial role in forecasting the company's prospects. To get a better picture, we shall go over certain factors that point towards ROFX being a good investment.

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## **Customer-Experience:**

ROFX promises the ultimate user experience for all of its clients. Traditional expert advisors usually require a user to install cumbersome software programs with a complicated and long installation procedure. ROFX is better in this regard as the installation process is quick and can be completed within 5 minutes. All one needs to do is to visit their website and subscribe to a particular package after selecting from the options. The robot takes care of the rest. All trading activity taking place on the platform is entirely autonomous in nature. No manual intervention is required. This makes ROFX one of those companies that an investor would be looking forward to.

- 

## **Future Prospects:**

ROFX has a lot of prospects as it's a reliable and effective source of generating passive income. In a post Covid19 world, people will prefer looking for risk-free investments which would bring them to the ROFX IPO. Also, the collection of impressive trading results over the years projects an optimistic forecast for the company.

- 

## **Quality of Results:**

The best way to measure the credibility of a trading robot is by taking a look at their trading results generated over an extended period of time. ROFX is on top of the edge here. They publish their trading results on their official website, as well as on Myfxbook, which is an authoritative public trading journal. One look at their impressive results which are updated almost daily will give you an idea about the reliability of ROFX's services. It will also provide an estimate of how much you stand to gain from using ROFX yourself.

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## **ROFX's Technology:**



ROFX is essentially more of a technology company rather than an Expert Advisor company. This is evident from the robust technology employed by ROFX, which makes its product stand out from the crowd. It uses a self-learning neural network that is powered by Artificial Intelligence which is constantly updated by a team of experts according to changing market conditions. In other words, the robot is capable of knowing how the market will behave by taking into consideration previous Also, the team of experts behind ROFX always look to update the program with newer strategies after back-testing them.

- 

### **Safety of Funds:**

ROFX mentions that it provides 100% security when it comes to user's funds, on their official website. This ensures that the chances of losing your investments even in the most adverse scenarios are It uses advanced money management and risk management tools to ensure the absolute safety of client funds. It allows no leverage and applies strict stop-loss placements to maximizing user's profits. The company also offers negative balance protection for its clients, where they cover losses generated by the robot from their reserve fund. Additionally, ROFX works closely with many brokerages around the world that are strictly under the regulation of international regulatory bodies. All of this makes ROFX a cut above the rest.

## **The Growth Potential of ROFX**

In the post-pandemic world, many expert investors, analysts, and professionals believe that many businesses will flourish, with many new life-changing companies being born. This makes it easier for certain firms to explode in popularity shortly. All the above indicate that the upcoming IPO for ROFX would be a great success. So if you want to invest in the company, we strongly suggest you look at the details of the company, sign up for the services, and wait for the IPO launch date. Even if you are not interested in the IPO, the passive income generation achieved by ROFX will certainly make you interested.

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Collaborative Post

# RoFx to go Public in 2021: Warren Buffett's Berkshire Hathaway Interested

By **Guest** - December 21, 2020

## The Story So Far

RoFx is the brand name of a software provider which has an Expert Advisor product on the market. It has been operating in the market for more than 10 years ever since its initial launch in 2009. Since its inception it has carved out a reputation as being one of the most efficient and secure forex robot services in the world, being especially helpful for forex traders. With a 50000 strong clientele spreading across several countries around the world. RoFx has always strived towards providing the highest degree of transparency to its clients while providing a constant stream of profits. Recently there has been news circulating that RoFx is planning on going public with its IPO slated to take place in the third quarter of 2021.



*Image supplied*

## Interest from Buffett's Berkshire Hathaway

The RoFx IPO has been generating quite the hype for a variety of reasons. Apart from its ten-year experience in the market, the growth in user base and clientele certainly boost the company's profile and credibility in the mainstream. However, there is one particular factor that has made RoFx the talking point in many financial forums. If certain news outlets are to be believed, Berkshire Hathaway, where Warren Buffett serves as a chairman is apparently interested in taking part in this IPO. Many experts believe that the firm is in talks for investing about \$500 million. RoFx could use the funds for AI development, which

would further improve the quality of its trading results. Buffett's interest and apparent involvement not only increases the interest in RoFx but also reflects the credibility and legitimacy of the brand name in the market.

### **Why You Should be interested in this IPO**

When investors go for a particular company, they should take an in-depth look into the company's fundamentals rather than basing their decisions solely on hype. It plays an important role in forecasting how the company's future will roll out. In this case, we've put forward some factors which make RoFx a viable investment for almost all investors.

#### *Client Fund Safety is Priority*

RoFx is one of the very few services of its kind which promise 100% client fund safety. In other words, the software ensures that its clients do not lose funds, even in the most adverse market conditions. Other measures taken to maximize user profits is the use of various money management and risk management tools, which keep losses to a bare minimum. In addition to that, RoFx does not allow leverage trading and it also has strict stop-loss systems in place. The company has entered into alliances with several brokerage firms across continents which are in turn regulated by international regulatory bodies. In Addition to this, the negative balance protection feature which RoFx provides makes it stand out from the crowd. Any losses incurred by the user which is caused by the robot are automatically compensated via their reserve fund. **All of these points make RoFx one of the most stable robots** to use.

#### *Level of Customer Experience*

RoFx provides the ultimate user experience, as indicated by their official website. From the start, one can see that it does not involve any cumbersome installation process like other similar services do. It has a seamless, fast, and easy process that does not take in excess of 5 minutes to complete. Just simply visit their website, select and subscribe to a particular package, and you are ready. The rest of the process is handled by the robot with all trading activities being autonomous on the platform.

#### *The RoFx technology*

RoFx is actually more of a technology company than it's a provider of expert advisors. This is reflected in the sophisticated technology that it uses, making it stand out from the rest of the pack. It uses an Artificial Intelligence-driven neural network, which adjusts according to prevailing market conditions. This allows RoFx to correctly form a prediction about how the market behaves, based on past references of the market. Also, there is a team of programmers and traders behind the software, who constantly update the software with new, back-tested strategies.

#### *Trading Results*

The best place to evaluate the effectiveness of a forex robot or EA is to take a look at their respective myfxbook page, which is an authoritative site for this purpose. If we take a look

at RoFx's official myfxbook page, it's quite apparent why it is regarded as one of the best. The software has recorded an astounding gain of 740.77% and a small drawdown rate of 0.35%, which is excellent for an EA. Myfxbook checks these figures and updates them on a regular basis. This not only reflects the reliability of the service but can also give you an estimation of how much you can earn in the long run.

#### *Company's Future potential*

RoFx is one of the best sources of passive income available to normal people. In a world after the Covid 19 pandemic, it can serve as a source for a risk-free investment. This, coupled with the company's track record and trading results, make it a company to look out for in the future.

#### Conclusion

Although the world markets look bleak currently due to the pandemic, financial experts expect it to improve following the pandemic. This is the perfect opportunity for many life-changing companies to be born, making the upcoming period very profitable for upcoming firms. All the above factors point towards the RoFx IPO being a huge success. So you should sign up and take a look at what they have to offer, before investing in the IPO. Even if you are not an investor, RoFx can appeal to you as a good source of generating passive income.

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# RoFx To Go Public in 2021: Warren Buffett's Berkshire Hathaway Interested

RoFx is one of the best sources of passive income available to normal people. In a world after the Covid 19 pandemic, it can serve as a source for a risk-free investment.

December 23, 2020 by [Shahbaz Ahmed](#) [Leave a Comment](#)



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## **Interest from Buffett's Berkshire Hathaway**

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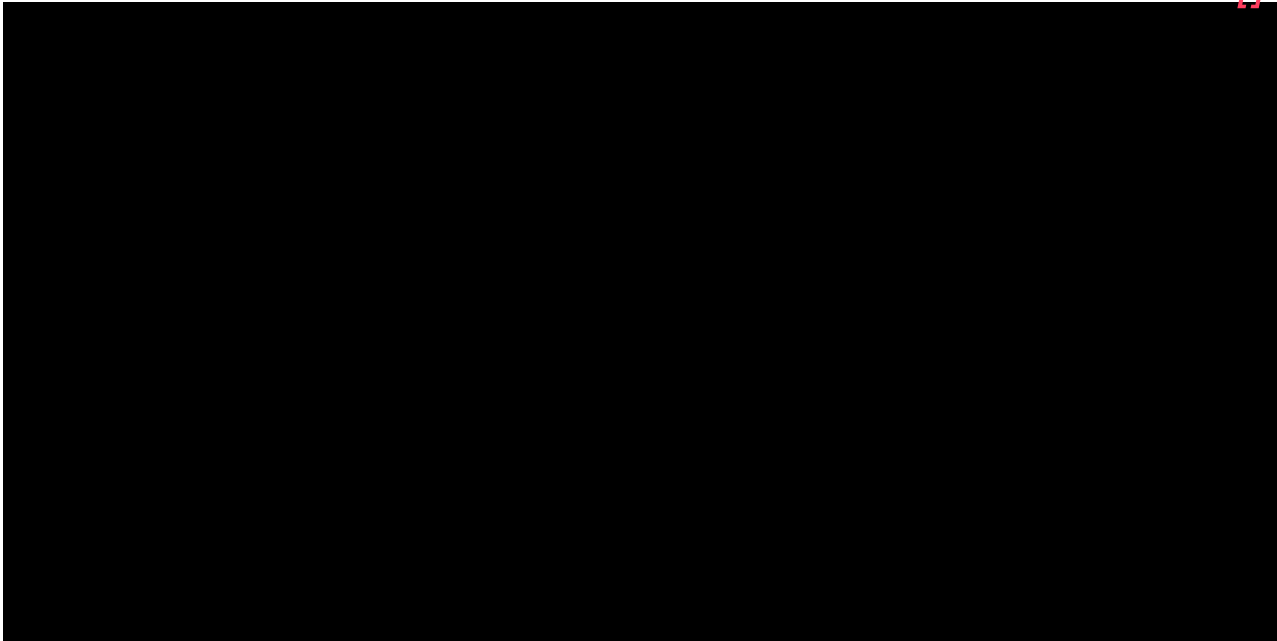
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### *Trading Results*

The best place to evaluate the effectiveness of a forex robot or EA is to take a look at their respective myfxbook page, which is an authoritative site for this purpose. If we take a look at RoFx's official myfxbook page, it's quite apparent why it is regarded as one of the best. The software has recorded an astounding gain of 740.77% and a small drawdown rate of 0.35%, which is excellent for an EA. Myfxbook checks these figures and updates them on a regular basis. This not only reflects the reliability of the service but can also give you an estimation of how much you can earn in the long run.

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Although the world markets look bleak currently due to the pandemic, financial experts expect it to improve following the pandemic. This is the perfect opportunity for many life-changing companies to be born, making the upcoming period very profitable for upcoming firms. All the above factors point towards the RoFx IPO being a huge success. So you should sign up and take a look at what they have to offer, before investing in the IPO. Even if you are not an investor, RoFx can appeal to you as a good source of generating passive income.

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*About Shahbaz Ahmed*

*My name is Shahbaz Ahmed. I am a blogger and have published many articles on different websites.*



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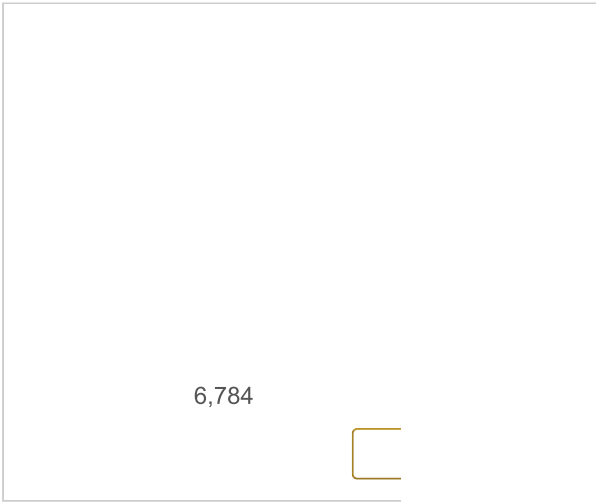
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# Warren Buffet Gets Interested in the Upcoming IPO of ROFX

By Editor - 12/31/2020



Photo by Luca Sammarco from Pexels

## The Announcement

ROFX is a [leading provider of forex expert advisor \(EA\) software](#) with more than ten years of experience in its pocket. Established in 2009, the company has been assisting traders worldwide. ROFX has more than 50,000 active global customers today. The forex trading robot shows a solid track record of generating constant profits for a long time. Hence, it is considered one of the most trustworthy trading EAs in the world. Recently, ROFX released an announcement regarding its plans of Initial Public Offerings (IPO) that is set for the first quarter in 2021.

## The Involvement of Warren Buffet

ROFX's IPO is the most awaited event in the financial market next year for many reasons. After its successful ten years and immense popularity, ROFX is the talk of the market regarding its IPO which is anticipated to be a grand success. The community is even more excited and there are continuous talks about this on the financial forums because the announcement has Warren Buffet interested in it. His company, Berkshire Hathaway is reportedly going to buy ROFX's majority stock holding. According to the terms of the agreement, Berkshire Hathaway has to invest \$500 million in AI development that would improve the ROFX trading results significantly. Apart from proving the credibility of ROFX, it will also escalate the interest of investors.

## Why Is ROFX IPO Exciting?

Before investing in a company, it is important to examine the fundamentals because they help you to predict if the company will perform well or not in the future. It is a great idea to invest in ROFX due to these reasons:

## Trading Results

The trading results generated by a trading EA are analyzed to know how credible it is. When it comes to ROFX, if the trading results are taken into account, there is no doubt that the EA is way more advanced than other trading robots available at present. You can visit the official website of ROFX to check its trading results. Another place where the results can be checked is the credible public trading journal MyFxBook. You can get an idea of the capabilities of ROFX trading EA from the impressive results on MyFxBook.

## Robust Technology

ROFX is more of a technology company than an EA company. It is the robust technology of the company that makes it more capable than its competitors. The company provides the trading robot with an AI-enabled self-learning neural network. The network updates the robot's database continuously so it is aware of all changes in the volatile forex market. The EA grasps how the market would change from past references. So, it can assist traders to [make the right decisions](#). Furthermore, a group of experienced traders and software programmers constantly updates the EA with backtested and proven strategies.

## User Experience

ROFX offers the ultimate user experience to the clients. Opposite of traditional trading robots with hefty software that are required to be downloaded with a lengthy installation process, ROFX is very simple to set up. You can have the entire setup procedure done within just a few minutes with ROFX. You only need to visit the website and select a package to subscribe to it. Afterward, everything will be taken care of by the EA. As you already know, ROFX encourages automated trading, so, all the trading activities are automated for your convenience. Manual intervention is not required at all. This is the type of company that you must invest into.

## Future Potential

You cannot overlook the future potential of ROFX. Forex trading has become one of, if not the best [method of passive income](#). However, there are not many EAs that can help traders as ROFX can. In the post-pandemic era, people are highly likely to pay attention to companies like ROFX that provide a risk-free environment for investment. Moreover, the impressive trading results of ROFX indicate the optimistic future performance of the company.

## Fraud Protection

ROFX provides 100% protection to the funds of its clients. Traders need not worry about losing their investments even in the oddest scenarios. The company uses several risk management and money management techniques to make sure that clients' funds are safe. It strictly maintains stop-loss placements and uses it to leverage for maximizing profits. Moreover, ROFX has partnered with brokers that are strictly regulated. The company offers negative balance protection to its clients. So, all losses produced by the EA are covered by the reserve fund of the company. It makes investing in ROFX the safest and highly rewarding.

## The Growth Potential of ROFX

It is believed by forex market experts, financial analysts, and billionaire investors that many companies will flourish during the post-pandemic situation. Firms have a high potential to grow in the future. With all these predictions, nobody can deny the success of ROFX's IPO. So, we recommend you research this company and sign up for the EA. Not only the upcoming IPO is important, but you also must be aware of service providers like ROFX in order to create your own passive income for a sustainable personal budget. That way, you can always be ready to face any financial crisis.

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# The Upcoming IPO of ROFX Snatches the Attention Warren Buffett

By Hellen Last Updated on Aug 6, 2021 at 14:48

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## Who Is ROFX And What About IPO?

ROFX is a company of expert advisor software with over ten years of experience in the forex market. Starting its journey in 2009, ROFX has become one of the leading forex EA service providers for traders around the world. Today, the company has more than 50,000 active international customers. ROFX shows a solid track record of producing profits constantly for a long time. Its clients consider it one of the most reliable trading EAs. Recently, the

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company announced its upcoming Initial Public Offering (IPO) that will take place in the first quarter of 2021.



## The Involvement Of Berkshire Hathaway

There are many reasons why ROFX's IPO is one of the most awaited events in the financial market. After the success and immense popularity of ten years, ROFX's IPO is expected to be a grand success by most experts. However, the community has been talking a lot about it on the financial forums because it intrigued Warren Buffet and Berkshire Hathaway, Buffet's company is reportedly going to purchase the majority stock holding of ROFX. According to the terms of the agreement, Berkshire Hathaway will invest \$500 million in Artificial Intelligence development that can improve the trading results of ROFX significantly. It will not only prove the credibility of ROFX but also escalate the interest of investors.

## What Is Exciting About the Rofx IPO?

Before you invest in a company, you should examine the fundamentals because they play an important role to predict if the future performance of the company would be good or bad. Here is a list of the reasons why it would be a great idea to invest in ROFX –

### Robust Technology

Rather than an EA company, it is more appropriate to call ROFX a technology company. It is the robust technology of the company that makes its EA stand out from its

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★★★★★ ( 2 ratings )

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### DhabiCoin Is just Hours Away from Making History in the Crypto Market

By Hellen on Jan 10, 2022

### BNPL Pay to Launch Security Focused Uncollateralized Lending Innovation

By Hellen on Jan 7, 2022



competitors. The trading robot is provided

with an AI-enabled self-learning neural network. This network continuously updates the database of the robot so it can be up-to-date about the changing market conditions. The robot knows how the market would change from previous references. So, it can help you make the right trading decisions. Moreover, a group of programmers and traders continues to update the robot with backtested and proved strategies.

### **Trading Results**

You can analyze the trading results produced by a trading robot over the years to gauge its credibility. From the trading results of ROFX, it can be said that it is way more advanced than other EAs available in the market. You may check out the trading results on the official website of ROFX and the reliable public trading journal MyFxBook. From those impressive results, you will get an idea of the amount of your earnings using ROFX.

### **Future Potential**

There is no way to overlook the future potential of ROFX. Forex trading is one of the most popular methods of passive income, and there is hardly another EA as reliable as ROFX to help people in trading. In the post-pandemic situation, people for sure are going to be attentive towards companies like ROFX that offer risk-free investment. The impressive trading results of the company also forecast an optimistic future performance of ROFX.

### **Fund Protection**

ROFX offers 100% protection to its clients' funds. Even in the most adverse scenarios, traders do not have to worry about losing their investments. Several money management and risk management techniques are used by the company to ensure client fund safety. It uses leverage to maximize profits and strictly maintains stop-loss placements. Moreover, ROFX is in partnerships with strictly regulated brokers. The best part is the negative balance protection that the company offers to all of its

clients. Thanks to this, all losses generated by the forex robot are covered by the reserve fund of the company. It not only makes investing in ROFX highly rewarding but also the safest.

### **User Experience**

The clients of ROFX are provided with the ultimate user experience. Contrary to traditional EAs with hefty software required to be downloaded with a lengthy installation procedure, it is very simple to start with ROFX. You can complete the entire set-up procedure with ROFX within just five minutes. To do it, you need to visit the website. After that, you can select a package and subscribe to it. The robot will take care of the rest on its own. It supports automated trading, so all trading activities are completely autonomous. There is no need for manual intervention which will make your job easier. This is the type of company people prefer when they want to invest.

### **The Growth Potential of ROFX**

Forex market experts, financial analysts, and billionaire investors trust that a number of companies are going to flourish in the post-pandemic situation. The potential for firms to grow is high in the future. With all these predictions taking place, there is no way to deny the success of ROFX's IPO.

The upcoming IPO is truly something to look forward to. Even if you are not into the IPO, it is a must to be aware of service providers like ROFX so you can create your own passive income for a sustainable personal budget prepared to face any financial crisis.

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🪙 BTC: \$ 41,607.4 (-2.58 %)    📈 ETH: \$ 3,047.18 (-4.89 %)    ⓧ XRP: \$ 0.7257 (-5.15 %)    🌱 BCF



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By PR Desk

JANUARY 31, 2021

# Rofx Announces IPO Following Remarkable Growth

Create brand buzz on top Crypto websites

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GUIDES



**What Is Web3?  
A Beginners  
Guide to Web  
3.0 (the  
Internet of the  
Future)**



**Five (5)  
Simple Ways  
to Know a  
Crypto Rug  
Pull and Avoid  
It**



**How to Make  
Money With  
Crypto in 2022**

Rofx has gained experience, within the vicinity of the financial market, beyond a decade. It is a company that develops forex robots to generate trades that earn consistent profits for its customers that is no less than 50,000. Therefore, it is being considered to be **the most trustworthy Expert Advisor, since 2009**. It provides automatic trades for trades throughout the world. And now it has gone away further to announce its Initial Public Offering (IPO) in the Q1 of 2021.

**Warren Buffet finds himself there**

The IPO is that event in the financial market, for which the investors have vehemently been waiting. This is solely because of the popularity that this company is enjoying for the last decade. This is the prime reason for which the investors have a serious level of trust in them. It has grabbed the attention of Warren Buffet.

It was found that people are talking about the present IPO launch of Rofx because it has been on the top priority list



of the company called Berkshire Hathaway, which is currently planning to buy the major stock of Rofx. The agreement says that Berkshire Hathaway requires investing \$500 million in Artificial Intelligence development which in turn would bring a significant change in the trading results. This will ultimately raise the interest and credibility of the trading robots.

### **The reason for Excitement behind the IPO launch**

It is very important to check the fundamentals of any company before initiating a step to invest there because that is where its performance depends. Now, the following are the necessary reasons that would help you consider Rofx while investing.

#### **1. Protection of funds:**

This is such an expert advising robot that it guarantees the cent percent safety of your fund. Its fine trading robot service helps you secure your investment in the direst situations. Here, there are excellent techniques, used by the company, that help manage your money and risk to protect your fund. Here the robots do not use leverages to increase your profits, yet maintain stop-loss placements. Regulated brokers have been the company's constant partners and the company holds negative balance protection. This is why the company has a reserve fund from where all the losses are covered which makes it the safest company providing significant rewards.

^

## **2. The user experience is amazing:**

Rofx is very easy and simple. It is very different from that of other old trading robots because you do not have to go through the long installation process but wait for just 5 minutes to finish the process. The traders do nothing other than selecting the desired package and subscribing to it. Everything else is taken care of by automated robots. Non-intervention of the traders is the reason why common people wish to invest here.

## **3. Fascinating results:**

If you look over the results from the past you can be clear of its holding in the market when you compare it with the other expert advisors. The results that are given on the official page of Rofx and Myfxbook, their trading journal, show how reliable these trading robots are.

## **4. Strength to future**

After a world, hit by a major pandemic, people would be seeking companies like Rofx that is free from risk. The most important thing is that one can easily be optimistic enough, just by viewing the trading results of the company. It is nearly impossible finding a company that is so reliable and has such a remarkably prospective future.

It will be vague to limit Rofx by calling it just a Forex robot developing company. On the contrary, it is apt to gift it the term of a technology company. This is only because of the

^



advanced technology of artificial intelligence which is enabled here helping to update the database without any stoppage. This is how it smoothly trades with the changing market condition. Looking at the past references efficiently predicts the decision of trading. This guarantees the exactness of your trade. Also, there are programmers who try to update the robots with back-tested strategies that are proven successful.

### **Potentiality growth of Fintech Company**

There are several market experts coupled with financial analysts, billionaires who are willing to invest because they feel positively towards the growth of several businesses, post-pandemic. They feel that some companies would stand as life-changing and will be exploding positively. Keeping in mind such predictions, it is believed that Rofx IPO will see the grandeur of success. This is why it is very important that you research the company and sign in to experience the benefits of the IPO when it launches. Apart from the IPO, you must know about Rofx to find ways for some passive income. This will ensure your budget and also be ready to face any financial setback.

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## Exhibit 4 - TrustPilot Reviews

EL **Ellie**  
✎ 1 review 📍 NL



Jun 7, 2018

### **I am fully satisfied with ROFX**

RoFx innovative technology provides a very tempting offer to earn good money being completely excluded from the process. They give what traders usually strive to seek in other automated platforms – guarantees. I am guaranteed to get my passive stable income on monthly basis, I am guaranteed in the security of my initial deposit, my revenue, and I am guaranteed for the coverage of any losses the robot might incur. Frankly speaking, I have never felt so confident in any trading platform before, as all they were rather suspicious and sketchy than safe. I am one of 23 000 RoFx customers who would gladly recommend the powerful and reliable system to every person who intends to raise good money and stay financially independent.

👍 Useful 2    🔗 Share



Review of [Rofx](#)

OP **opulence209**  
✎ 1 review 📍 IN



Jun 9, 2018

### **It really saves a lot of time and energy**

I tried to trade many times. I studied strategies, took lessons from experienced traders, spent a lot of time and effort, but nothing worked – I just wasted my time and money. When my friends recommended the robot RoFx, my things got better. Now I have 3 packages their AI robot manages my funds. It really saves a lot of time and energy!

👍 Useful    🔗 Share



Review of [Rofx](#)

**KA** kazipurobi  
✎ 1 review 📍 BD



Jun 20, 2018

### **My experience with Rofx**

Robot RoFx is amazing!

I never succeeded at trading before. . I was shattered & then my cousin told me how they make money online. Since I started with RoFx AI robot, I no longer need to monitor the markets and analyze a bunch of information. It makes trades for me. It changed my life & i recommend it to everyone!

👍 Useful 2    🔗 Share



Review of [Rofx](#)

**RD** Robin Darby  
✎ 1 review 📍 NL



Nov 15, 2018

### **I've been with RoFx for 7 years**

I've been with RoFx for 7 years. At first, I have started with the minimum amount just to properly test the system. Now I am a VIP client of RoFx and absolutely satisfied. I've never had problems with withdrawals and have decent income for a long time. The only downside is that weekends and public holidays are non-trading days and profit is not credited on these days.

👍 Useful 3    🔗 Share



Review of [Rofx](#)

**AD** **Adam**  
✎ 1 review 📍 PL



Jul 9, 2019

**I have been on rofx since February 2019...**

I have been on rofx since February 2019 and in total I invested 47,500 EUR (for a short period of about 2.5 months 10x 4999EUR trial package extended to 50 days) and I transferred back to my bank 51,700EUR. over 4000EUR profit. It works phenomenally. I think now about a similar amount of investment, but for a period of 270 days.

👍 Useful 1    🔄 Share



Review of [Rofx](#)

 **毎日トリリンガルな**  
✎ 1 review 📍 AU



Sep 7, 2019

**This company is very reliable company**

This company is very reliable company. I become Money maker now. I will keep my money for 10 years at least. The staff manage each clients money well. Especially the guy who manage my managing is very responsible, and reliable. They ring me all the time to tell me how much did I make, and increase in the future. The company also send me E mail to let the clients know how many profit did the clients earn every single day.

👍 Useful 1    🔄 Share



Review of [Rofx](#)

**ER** **Evan Rider**  
✎ 1 review 📍 US



Nov 12, 2019

### To Ryan

I've been using their service for more than 3 years, never experienced any issues with withdrawals. I have No lock - No limit package that is available occasionally, with no restrictions in period, so I can withdraw my entire deposit whenever I want. And I have already made it several times.

I advise to attend their annual conference and to see everything with your own eyes, get acquainted with the list of brokers they work with, btw, some brokers' representatives visit it as well.

Anyway, there is a good financial rule - don't put all your eggs in one basket! ;-)

👍 Useful    🔗 Share



Review of [Rofx](#)

**TL** **Trevor Lee-Chan 陳德正**  
✎ 1 review 📍 CA



Nov 13, 2019

### It took me 1 month to build up to the...

It took me 1 month to build up to the \$1000 USD withdrawal minimum

Proof of deposit at: [bit.ly/rofxtrading](https://bit.ly/rofxtrading)

👍 Useful    🔗 Share



Review of Rofx (/review/www.rofx.net)

**MA** Marilyn Anderson (/users/5ddc2e9866de328b971c7d69)  
1 review US



Nov 25, 2019

I few months ago I was introduced to... (/reviews/5ddc2ea8c845450a089298c1)

I few months ago I was introduced to Rofx. I decided to do a trial 1000. I had no problem with this company. Every time I called the phone was answered by a live person. Super customer service. I had no problem withdrawing my money at the end of the trial period. I have used other platforms and lost money. I highly recommend trading with Rofx, Marilyn

Useful Share



Review of Rofx (/review/www.rofx.net)

**MK** mary kendrick (/users/5c088e06df1d56d8d404f3b5)  
1 review US



Jan 6, 2020

I have been using ROFX since April... (/reviews/5e13fee6c845450914b2ac5c)

I have been using ROFX since April 2018. I have had excellent customer service, even getting a call back after a butt dial late one evening. I have never had any trouble with money withdrawals, usually getting it with in 4 or 5 days. Very happy with this company.

Mary K , Florida

Useful Share



Review of Rofx (/review/www.rofx.net)

**JN** JN (/users/5e191b3e013d4102c3200853)  
2 reviews US



Jan 10, 2020

Happy Customer (/reviews/5e191b4fc8454508343f80ae)

I've been with ROFX since June 2019 with a Moneymaker level (10k). After seeing my first withdrawal of 1k after about 2 months, I added more and getting close to VIP. Currently withdrawing around 1k every 3-7 trading days, now thru Bitcoin to reduce commissions. Happy customer :)

Useful 1 Share





Review of Rofx (/review/www.rofx.net)

**TH** Tanya Hart (/users/6065e76c2b3d1f001a220889)  
1 review US



Apr 1, 2021

I am writing this review after using... (/reviews/6065e78cf85d75087042b1e9)

I am writing this review after using this product for more than 2 years now and I just want to say you cannot get a better robot than this in the industry right now. From the set up process to the withdrawal everything was so smoothly done and best part is you don't need to put any effort; the robot does it all automatically for you. If you're in the trial package right now I would highly recommend upgrading and trying the Gold or VIP package. I'm getting insane returns after I switched to the Gold package recently. The performance fee is also comparatively low here. If you're a beginner and not sure about all these then it's probably best if you start with some extra money at first. I did the same thing when I started my trading career 6 years back. Go ahead and start trading using this robot, if you haven't till now

Useful Share



Review of Rofx (/review/www.rofx.net)

**LR** Leah Raack (/users/608ee26528034f001a827b58)  
1 review US



May 2, 2021

I started my forex trade with the trial... (/reviews/608ee2c1f9f48708f0e9ccc2)

I started my forex trade with the trial package and slowly moved up to the VIP account. Prior to this, trading was never simpler. They also have a number of other advantages in their services that will attract you to get engaged with the robot for sure. The best thing about them is that they have got a reserve fund of their own. The support staff for customers is also very supportive and attentive. This robot also helps you to withdraw your funds via BTC in order to escape the hefty bank charges that are levied. So, my overall experience with this robot was great, and I made a lot of money. I will recommend this forex robot to every person who wants to be a trading professional.

Useful 1 Share



Review of Rofx (/review/www.rofx.net)

**VR** Vanaya Rae (/users/609019a141abe3001a328c81)  
1 review US



May 3, 2021

I went through a few of the reviews and... (/reviews/609019adf9f4870a6ca4543a)

I went through a few of the reviews and found some derogatory comments about the service offered by the robot. Several individuals have even complained about not making a proper winning streak. One point to remember is that, under certain business cycles, market ranges, and market conditions, these types of services operate. It is very difficult to get reliable results all the time because the trading market does not stay static all the time. But this particular robot differs a bit from other similar robots because its not a scam. It is beginner friendly and designed by experienced people who know the ins and outs of trading.

Useful 1 Share



Review of Rofx (/review/www.rofx.net)

**FN** Finley Nelson (/users/609142635a813d001b0d9dd5)  
1 review US



May 4, 2021

I have been using this robot for more... (/reviews/6091443bf9f4870a786df62a)

I have been using this robot for more than 3 years and it has provided me with outstanding services to date with full winning streaks. This was possible because to provide a consistent advantage, this robot uses AI driven algorithms, which gives you full chances of winning. I have been fitted by the robot with extra ordinary facilities, and I am very pleased with the outcomes so far. To avoid heavy bank charges, this forex robot also helps you to withdraw your funds through BTC. I am reasonably satisfied with this robot's services and would strongly advise everyone first to understand the forex market and then start trading. Trade cautiously and you'll certainly earn good profits.

Useful 1 Share



Review of Rofx (/review/www.rofx.net)

**RC** Reba Cox (/users/60cae33fb116d00019d5d1d0)  
1 review US



Jun 17, 2021

Most of those gains were in stock (/reviews/60cae461f9f4870bbc57f2dc)

Most of those gains were in stock. Only 26 percent of respondents earn income from stocks and bonds. Also, just 35 percent earn income from investment vehicles. The results can be confusing, especially to people like Steve Bailey. Bailey graduated from business school at the University of Washington in June. While he'll earn a higher salary this year as a product manager with Google, his net worth is minuscule. Bailey earns a paycheck from Google through the firm's finance division, which develops software tools for data analysis, including programs for analyzing data on websites and mobile applications. His employer, which was acquired by Google in 2012, isn't listed among those gaining the most net wealth since 2014. The results of a survey of more than 12,000 U.S.

Useful Share



Review of Rofx (/review/www.rofx.net)

**WE** WesleyHall (/users/604d514036db95001ac6e337)  
1 review US



Jul 4, 2021

**AWESOME GUYS** (/reviews/60e27407f9f4870750390aad)

Very good service, transparent. For the most part consistent profits. Negative trading days are covered through their Reserve fund. Customer service is diligent and very professional. Do research the forex industry.

Useful Share



Review of Rofx (/review/www.rofx.net)

**KA** Kay (/users/614a4b1deaf55700128f96c2)  
1 review US



Sep 21, 2021

**Never had an issue with ROFX** (/reviews/614a4b3c6223e22118b7116a)

I have been a client for almost 2 years and I've never had any problem with ROFX. They are very prompt in responding to emails and could easily be contacted via live chat. They openly communicate daily trade updates and cover loss trades with their reserves. I've done better trading forex with them than I did on my own. It was easy for me to withdraw funds from my account when I needed to do so.

Useful 1 Share



# Exhibit 5 - RoFx ICO Emails

# BRKROFX

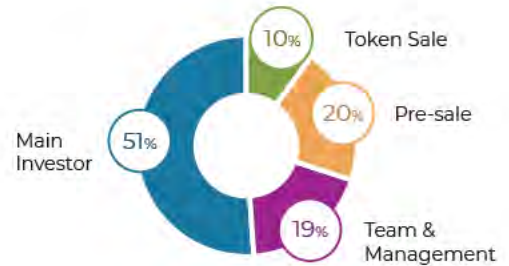
## ICO Details

- Pre-Sale Date: **March 1 - April 30, 2021.**
- ICO Date: **June 1st, 2021.**
- 1 token = 1 US Dollar.
- BRKROFX Tokens total supply: 1,000,000,000.
  - Pre-sale: 200,000,000 tokens.
  - Public sale: 100,000,000 tokens.
- Simple access via Myetherwallet, MyCrypto and other Ethereum web & mobile wallets.
- Simple tracking and monitoring starting from Pre-Sale & Public Sale event on Etherscan and other resources.
- Starting from June 1st, 2021 available on the following exchanges: Coinbase, Binance, Kraken, Bitfinex, Bithumb, Bitstamp and others.
- Token packages subscription is available starting from March 1st, 2021  
<https://rofx.net/brkrofx>

## ICO Mission

- Raised funds are specifically intended for a new edge AI-based trading platform V2.0 development in order to increase trading robot profitability and ensure it's transparency and efficiency.
- Estimated average daily trading performance of the new platform V2.0 is 0.97%. Release is scheduled on March 31st, 2021. New AI platform V2.0 will be available for BRKROFX token packages only.
- Revenue generated by the company is distributed proportionally between all token holders on the annual basis.

## Tokens Allocation Model



## BRKROFX Token Pre-sale Discounts

Customer Package Type	Pre-Sale Discount
Trial	1%
Easy start	2%
Moneymaker	3%
Gold	4%
VIP 100,000 - 1,000,000	5%
VIP 1,000,000 - 2,000,000	6%
VIP 2,000,000 - 3,000,000	7%
VIP 3,000,000 - 5,000,000	8%
VIP more than 5,000,000	9%



---

## ICO date is rescheduled

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Jun 1, 2021 9:10:11 AM

---

Dear Customers,

We would like to have you informed that due to delay in compliance procedure conducted by the financial authorities, the ICO date is rescheduled to January 3, 2022. (Or earlier, if possible.)

Delay is caused by Coronavirus pandemic, that has slowed the compliance process in general and as a result compliance schedules have moved.

We will keep you updated

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44-20-3807-6029 (UK)  
+1-888-907-0714 (USA)  
+852-3001-1002 (Hong Kong)  
<https://my.rofx.net/login>



---

## Pre-sale extended

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Mar 31, 2021 12:08:25 PM

---

Dear Customers,

We are thrilled to announce that during token Pre-sale, its demand has significantly outreached supply. We have received many requests from our Customers expressing regrets they did not succeed to buy BRKROFX till the pre-sale end

Our Customers have always been our top priority, thus RoFx Management decided to extend the pre-sale till April 30, 2021 and allocate 100 000 000 tokens from the Public sale to Pre-sale.

Please, check updated info here <https://ico.rofx.net/>

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44-20-3807-6029 (UK)  
+1-888-907-0714 (USA)  
+852 3001 1002 (Hong Kong)  
<https://my.rofx.net/login>



---

## RoFx launches the AI platform V2.0

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Apr 1, 2021 5:38:52 AM

---

Dear Customers,

We are happy to announce that RoFx launches the AI platform V2.0 today. We have been working on this new platform since 2017 and now we are proud to release it.

All token packages have been switched to new AI V 2.0 platform.

Please, check updated trading reports here <https://rofx.net/trading-reports/>

Upgraded AI V 2.0 Calculator here <https://rofx.net/for-customers/>

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44-20-3807-6029 (UK)  
+1-888-907-0714 (USA)  
+852 3001 1002 (Hong Kong)  
<https://my.rofx.net/login>





---

## RoFx: pre-IPO

**From:** info@rofx.net  
**To:** [REDACTED]@[REDACTED].com  
**Date:** Sep 11, 2020 4:44:34 AM

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Dear RoFx Customers!

Many of you are already aware that RoFx is preparing for an IPO (Initial Public Offering) in the third quarter of 2021.

We have been receiving multiple requests from you if we are going to have the pre IPO and its date. Thus, we would like to have you informed that we plan the pre-IPO exclusively for our VIP package holders approximately 2 months to go before the IPO. You will be notified accordingly in advance.

Sincerely Yours,  
Customer Support Team  
support@rofx.net  
+44-20-3807-6029 (UK)  
+1 888 907 0714 (USA)  
+852-8170-0884 (Hong Kong)  
<https://my.rofx.net/login>

# Exhibit 6 - Claimant Transactions

Claimants	Beneficiary	Transaction Date	Amount	Currency
Ru	Epayments Systems Ltd.	01/29/2018	4,999.00	(EUR)
M	Epayments Systems Ltd.	03/07/2018	7,500.00	(USD)
At	Epayments Systems Ltd.	03/12/2018	1,000.00	(EUR)
Ru	Epayments Systems Ltd.	03/23/2018	9,999.00	(EUR)
Ru	Epayments Systems Ltd.	03/26/2018	9,999.00	(EUR)
At	Epayments Systems Ltd.	04/02/2018	1,000.00	(EUR)
At	Epayments Systems Ltd.	04/04/2018	2,000.00	(EUR)
At	Wealthy Developments LP	04/09/2018	2,800.00	(EUR)
Ge	Epayments Systems Ltd.	04/14/2018	1,000.00	(EUR)
Ge	Epayments Systems Ltd.	05/04/2018	1,000.00	(EUR)
At	Epayments Systems Ltd.	05/08/2018	2,000.00	(EUR)
Mc	Aware Choice Ltd.	06/12/2018	20,000.00	(USD)
At	Wealthy Developments LP	07/07/2018	10,000.00	(EUR)
At	Wealthy Developments LP	07/07/2018	10,000.00	(EUR)
Ge	Wealthy Developments LP	07/12/2018	1,000.00	(EUR)
No	Aware Choice Ltd.	07/12/2018	5,100.00	(USD)
No	Aware Choice Ltd.	07/20/2018	11,000.00	(USD)
Ge	Wealthy Developments LP	07/23/2018	1,200.00	(USD)
Mc	Aware Choice Ltd.	07/23/2018	5,000.00	(USD)
Ra	Wealthy Developments LP	07/23/2018	1,000.00	(USD)
Ge	Wealthy Developments LP	08/01/2018	1,000.00	(EUR)
At	Wealthy Developments LP	08/21/2018	1,000.00	(EUR)
St	Aware Choice Ltd.	08/22/2018	14,000.00	(USD)
Mc	Wealthy Developments LP	08/31/2018	20,000.00	(USD)
At	Wealthy Developments LP	09/03/2018	2,800.00	(EUR)
Ge	Wealthy Developments LP	09/03/2018	1,000.00	(EUR)
At	Epayments Systems Ltd.	09/05/2018	2,000.00	(EUR)
Mc	Wealthy Developments LP	09/11/2018	25,000.00	(USD)
Ra	Aware Choice Ltd.	09/26/2018	15,000.00	(USD)
Ke	Aware Choice Ltd.	10/10/2018	46,000.00	(USD)
M	Aware Choice Ltd.	10/26/2018	50,000.00	(USD)
M	Aware Choice Ltd.	10/26/2018	500	(USD)
St	Brass Marker s.r.o.	11/08/2018	79,000.00	(USD)
Afs	Brass Marker s.r.o.	11/15/2018	10,000.00	(EUR)
Afs	Brass Marker s.r.o.	11/16/2018	7,000.00	(USD)
Ke	Brass Marker s.r.o.	11/16/2018	50,000.00	(USD)
Ke	Brass Marker s.r.o.	11/26/2018	51,000.00	(USD)
Ke	Brass Marker s.r.o.	11/29/2018	100,000.00	(USD)
Ge	Brass Marker s.r.o.	12/03/2018	1,000.00	(EUR)
At	Brass Marker s.r.o.	12/13/2018	2,400.00	(EUR)
Mc	Aware Choice Ltd.	12/18/2018	25,000.00	(USD)
Ke	Brass Marker s.r.o.	01/12/2019	110,000.00	(USD)
Da	Brass Marker s.r.o.	01/13/2019	1,000.00	(USD)
Sv	Brass Marker s.r.o.	01/23/2019	1,000.00	(EUR)
Fie	Profit Media Group LP	01/25/2019	4,999.00	(USD)
Ke	Profit Media Group LP	01/30/2019	80,000.00	(USD)

Ge		Aware Choice Ltd.	02/21/2019	11,500.00	(EUR)
Ge		Aware Choice Ltd.	02/22/2019	11,600.00	(EUR)
Sc		VDD-Trading, Ltd.	02/26/2019	1,000.00	(USD)
Ge		VDD-Trading, Ltd.	03/04/2019	7,843.00	(USD)
Da		VDD-Trading, Ltd.	03/07/2019	3,031.00	(USD)
Ke		Aware Choice Ltd.	03/15/2019	25,000.00	(USD)
Sv		VDD-Trading, Ltd.	03/20/2019	1,000.00	(EUR)
Pie		VDD-Trading, Ltd.	03/21/2019	10,000.00	(USD)
Fie		Aware Choice Ltd.	03/28/2019	27,000.00	(USD)
Ge		VDD-Trading, Ltd.	04/02/2019	1,000.00	(EUR)
Co		VDD-Trading, Ltd.	04/03/2019	2,000.00	(EUR)
Ge		VDD-Trading, Ltd.	04/03/2019	7,843.00	(USD)
Bla		VDD-Trading, Ltd.	04/15/2019	1,000.00	(USD)
Ge		VDD-Trading, Ltd.	04/15/2019	1,000.00	(EUR)
Ke		Aware Choice Ltd.	04/15/2019	45,800.00	(USD)
Sv		VDD-Trading, Ltd.	04/23/2019	19,000.00	(EUR)
An		VDD-Trading, Ltd.	04/25/2019	15,000.00	(USD)
Co		VDD-Trading, Ltd.	05/08/2019	1,400.00	(EUR)
M		Aware Choice Ltd.	05/08/2019	50,000.00	(USD)
Ke		VDD-Trading, Ltd.	05/20/2019	17,800.00	(USD)
Ke		Aware Choice Ltd.	05/22/2019	100,000.00	(USD)
No		Aware Choice Ltd.	06/14/2019	30,000.00	(USD)
Mc		Aware Choice Ltd.	06/18/2019	25,000.00	(USD)
Ko		Auro Advantages, LLC	06/19/2019	5,000.00	(USD)
Bla		Auro Advantages, LLC	06/23/2019	5,020.00	(USD)
Afs		VDD-Trading, Ltd.	06/27/2019	5,000.00	(USD)
No		Aware Choice Ltd.	06/27/2019	20,000.00	(USD)
Co		Profit Media Group LP	07/02/2019	2,000.00	(EUR)
Da		VDD-Trading, Ltd.	07/02/2019	3,031.00	(USD)
Afs		VDD-Trading, Ltd.	07/04/2019	12,000.00	(USD)
Afs		VDD-Trading, Ltd.	07/04/2019	6,000.00	(USD)
Afs		VDD-Trading, Ltd.	07/10/2019	4,700.00	(USD)
Ka		VDD-Trading, Ltd.	07/17/2019	2,900.00	(EUR)
Ke		Auro Advantages, LLC	07/20/2019	6,000.00	(USD)
M		Auro Advantages, LLC	07/23/2019	4,000.00	(USD)
Wi		Auro Advantages, LLC	07/23/2019	20,000.00	(USD)
Bla		Auro Advantages, LLC	07/25/2019	25,500.00	(USD)
No		VDD-Trading, Ltd.	08/01/2019	8,800.00	(USD)
Afs		VDD-Trading, Ltd.	08/05/2019	12,000.00	(USD)
Hu		Auro Advantages, LLC	08/07/2019	5,500.00	(USD)
M		Auro Advantages, LLC	08/07/2019	7,000.00	(USD)
Hu		Auro Advantages, LLC	08/08/2019	5,500.00	(USD)
Ka		VDD-Trading, Ltd.	08/13/2019	1,800.00	(EUR)
M		Auro Advantages, LLC	08/27/2019	21,500.00	(USD)
Le		Auro Advantages, LLC	08/29/2019	11,000.00	(USD)
Se		Auro Advantages, LLC	08/29/2019	1,000.00	(USD)
Hu		Auro Advantages, LLC	09/02/2019	8,500.00	(USD)
Hu		Auro Advantages, LLC	09/03/2019	8,500.00	(USD)

Afs		VDD-Trading, Ltd.	09/04/2019	3,869.68	(USD)
Afs		VDD-Trading, Ltd.	09/04/2019	4,900.00	(USD)
M		Auro Advantages, LLC	09/06/2019	1,001.00	(USD)
Se		Auro Advantages, LLC	09/06/2019	1,000.00	(USD)
Slo		Auro Advantages, LLC	09/10/2019	150,000.00	(USD)
Ja		VDD-Trading, Ltd.	09/27/2019	10,500.00	(USD)
Se		Notus, LLC	10/01/2019	3,000.00	(USD)
Lo		Notus, LLC	10/15/2019	10,000.00	(USD)
Se		Notus, LLC	10/16/2019	1,700.00	(USD)
Afs		VDD-Trading, Ltd.	10/18/2019	7,150.00	(USD)
Ru		Notus, LLC	10/18/2019	30,000.00	(USD)
ST		Notus, LLC	10/18/2019	3,500.00	(USD)
Be		Notus, LLC	10/19/2019	30,000.00	(USD)
Afs		VDD-Trading, Ltd.	10/25/2019	9,753.30	(USD)
La		Aware Choice Ltd.	10/25/2019	105,000.00	(USD)
Se		Notus, LLC	10/25/2019	1,000.00	(USD)
Ke		Notus, LLC	11/01/2019	30,000.00	(USD)
He		Notus, LLC	11/05/2019	5,000.00	(USD)
He		Notus, LLC	11/06/2019	5,000.00	(USD)
Hu		Notus, LLC	11/06/2019	1,500.00	(USD)
Afs		VDD-Trading, Ltd.	11/11/2019	1,000.00	(USD)
Ge		VDD-Trading, Ltd.	11/11/2019	1,400.00	(EUR)
Afs		VDD-Trading, Ltd.	11/12/2019	11,370.00	(USD)
Afs		VDD-Trading, Ltd.	11/12/2019	11,690.00	(USD)
Be		Notus, LLC	11/12/2019	20,000.00	(USD)
La		Aware Choice Ltd.	11/12/2019	105,000.00	(USD)
Afs		VDD-Trading, Ltd.	11/13/2019	11,370.00	(USD)
M		Notus, LLC	11/13/2019	10,000.00	(USD)
He		Notus, LLC	11/14/2019	5,000.00	(USD)
Da		Notus, LLC	11/25/2019	1,000.00	(USD)
St		Notus, LLC	11/25/2019	14,900.00	(USD)
Sc		Notus, LLC	12/03/2019	1,000.00	(USD)
Be		Notus, LLC	12/04/2019	5,518.36	(USD)
Ga		Notus, LLC	12/10/2019	5,000.00	(USD)
Ge		Aware Choice Ltd.	12/13/2019	6,000.00	(EUR)
Ja		Notus, LLC	12/13/2019	10,250.00	(USD)
Oh		Notus, LLC	12/13/2019	1,000.00	(USD)
Ro		Notus, LLC	12/13/2019	10,001.00	(USD)
Th		Notus, LLC	12/13/2019	101,000.00	(USD)
Da		Notus, LLC	12/17/2019	1,000.00	(USD)
Oh		Notus, LLC	12/17/2019	1,000.00	(USD)
Da		Notus, LLC	12/19/2019	18,000.00	(USD)
Ga		Notus, LLC	01/02/2020	40,000.00	(USD)
Vu		Notus, LLC	01/02/2020	11,000.00	(USD)
Ga		Notus, LLC	01/03/2020	100,000.00	(USD)
St		Notus, LLC	01/03/2020	4,500.00	(USD)
Ge		Aware Choice Ltd.	01/07/2020	1,000.00	(EUR)
M		Aware Choice Ltd.	01/09/2020	1,000.00	(EUR)

Da		Notus, LLC	01/10/2020	36,000.00	(USD)
Me		Aware Choice Ltd.	01/10/2020	2,000.00	(EUR)
Bro		Notus, LLC	01/11/2020	3,000.00	(USD)
Las		Notus, LLC	01/11/2020	1,000.00	(USD)
Luc		Shopostar, LLC	01/11/2020	100,000.00	(USD)
Fie		Notus, LLC	01/13/2020	168,000.00	(USD)
Afs		Aware Choice Ltd.	01/14/2020	14,800.00	(USD)
Ga		Notus, LLC	01/14/2020	5,000.00	(USD)
Afs		Aware Choice Ltd.	01/15/2020	7,391.00	(USD)
Eyt		Notus, LLC	01/15/2020	10,000.00	(USD)
Afs		Aware Choice Ltd.	01/16/2020	7,400.00	(USD)
Eyt		Notus, LLC	01/16/2020	10,000.00	(USD)
Set		Notus, LLC	01/19/2020	3,500.00	(USD)
Oh		Notus, LLC	01/20/2020	4,000.00	(USD)
Bo		Aware Choice Ltd.	01/21/2020	1,000.00	(USD)
Oh		Notus, LLC	01/21/2020	4,000.00	(USD)
Las		Notus, LLC	01/22/2020	1,000.00	(USD)
Las		Aware Choice Ltd.	01/24/2020	2,000.00	(USD)
Pat		Aware Choice Ltd.	01/25/2020	10,000.00	(USD)
Ke		Notus, LLC	01/28/2020	48,000.00	(USD)
Me		Aware Choice Ltd.	01/28/2020	10,500.00	(EUR)
Pat		Aware Choice Ltd.	01/28/2020	10,000.00	(USD)
Sto		Notus, LLC	01/29/2020	40,000.00	(USD)
Sto		Notus, LLC	01/29/2020	50,000.00	(USD)
Ke		Aware Choice Ltd.	01/30/2020	10,000.00	(USD)
Las		Aware Choice Ltd.	01/30/2020	6,000.00	(USD)
Pat		Aware Choice Ltd.	01/31/2020	20,000.00	(USD)
Set		Aware Choice Ltd.	01/31/2020	2,000.00	(USD)
Bo		Aware Choice Ltd.	02/01/2020	1,000.00	(USD)
Bay		Trans-Konsalt MR Ltd.	02/06/2020	4,500.00	(USD)
Bra		Notus, LLC	02/06/2020	10,000.00	(USD)
Pat		Notus, LLC	02/06/2020	20,000.00	(USD)
Bel		Notus, LLC	02/07/2020	10,000.00	(USD)
Me		Trans-Konsalt MR Ltd.	02/07/2020	12,000.00	(EUR)
Me		Trans-Konsalt MR Ltd.	02/07/2020	8,000.00	(EUR)
Me		Trans-Konsalt MR Ltd.	02/07/2020	8,500.00	(EUR)
Pat		Notus, LLC	02/10/2020	10,000.00	(USD)
Bel		Notus, LLC	02/11/2020	3,000.00	(USD)
Bro		Notus, LLC	02/11/2020	2,000.00	(USD)
Me		Trans-Konsalt MR Ltd.	02/14/2020	2,000.00	(EUR)
De		Shopostar, LLC	02/16/2020	1,000.00	(USD)
Me		Trans-Konsalt MR Ltd.	02/19/2020	19,000.00	(EUR)
Ke		Trans-Konsalt MR Ltd.	02/22/2020	1,000.00	(EUR)
Da		Notus, LLC	02/26/2020	4,400.00	(USD)
Lan		Notus, LLC	03/02/2020	150,000.00	(USD)
Eyt		Trans-Konsalt MR Ltd.	03/03/2020	10,000.00	(USD)
Hu		Trans-Konsalt MR Ltd.	03/03/2020	18,000.00	(USD)
Loa		Notus, LLC	03/03/2020	1,000.00	(USD)

W		Notus, LLC	03/03/2020	1,000.00	(USD)
Hu		Trans-Konsalt MR Ltd.	03/04/2020	18,000.00	(USD)
Se		Trans-Konsalt MR Ltd.	03/04/2020	4,300.00	(USD)
Eyt		Trans-Konsalt MR Ltd.	03/05/2020	40,000.00	(USD)
Bo		Trans-Konsalt MR Ltd.	03/06/2020	3,000.00	(USD)
Sc		Notus, LLC	03/06/2020	1,000.00	(USD)
Jag		Trans-Konsalt MR Ltd.	03/09/2020	50,000.00	(EUR)
St		Trans-Konsalt MR Ltd.	03/09/2020	50,000.00	(USD)
Ke		Trans-Konsalt MR Ltd.	03/10/2020	1,500.00	(EUR)
M		Trans-Konsalt MR Ltd.	03/13/2020	10,000.00	(EUR)
De		Notus, LLC	03/16/2020	1,999.00	(USD)
De		Notus, LLC	03/17/2020	2,000.00	(USD)
La		Notus, LLC	03/17/2020	10,000.00	(USD)
De		Notus, LLC	03/18/2020	1,998.00	(USD)
Sh		Notus, LLC	03/18/2020	10,000.00	(USD)
Vu		Notus, LLC	03/18/2020	8,000.00	(USD)
De		Notus, LLC	03/19/2020	1,996.00	(USD)
De		Notus, LLC	03/20/2020	1,997.00	(USD)
Se		Notus, LLC	03/25/2020	1,200.00	(USD)
Nh		Trans-Konsalt MR Ltd.	03/26/2020	10,000.00	(USD)
Go		Notus, LLC	03/30/2020	100,000.00	(USD)
Jag		Trans-Konsalt MR Ltd.	03/30/2020	25,000.00	(EUR)
Sm		Notus, LLC	03/30/2020	1,000.00	(USD)
Da		Notus, LLC	03/31/2020	9,000.00	(USD)
Da		Notus, LLC	03/31/2020	9,500.00	(USD)
Da		Notus, LLC	03/31/2020	9,525.00	(USD)
De		Notus, LLC	04/02/2020	10,000.00	(USD)
No		Notus, LLC	04/02/2020	20,000.00	(USD)
Ke		Notus, LLC	04/07/2020	5,000.00	(USD)
Sh		Notus, LLC	04/07/2020	12,000.00	(USD)
Wi		Notus, LLC	04/07/2020	10,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	04/08/2020	1,100.00	(USD)
Sc		Notus, LLC	04/09/2020	1,000.00	(USD)
Sh		Notus, LLC	04/09/2020	11,000.00	(USD)
Da		Notus, LLC	04/15/2020	4,600.00	(USD)
Da		Notus, LLC	04/16/2020	4,600.00	(USD)
Eyt		Notus, LLC	04/17/2020	6,200.00	(USD)
Sh		Notus, LLC	04/19/2020	13,000.00	(USD)
Se		Notus, LLC	04/22/2020	2,600.00	(USD)
Ke		Notus, LLC	04/23/2020	95,000.00	(USD)
Sh		Notus, LLC	04/23/2020	20,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	04/24/2020	2,096.00	(USD)
Ba		Boonruk Ruamkit Co., Ltd.	04/28/2020	12,000.00	(USD)
Lu		Notus, LLC	04/28/2020	160,000.00	(USD)
Se		Global E-Advantages	04/28/2020	1,500.00	(USD)
Ko		Notus, LLC	05/02/2020	10,100.00	(USD)
Bh		Notus, LLC	05/04/2020	1,000.00	(USD)
Sh		Notus, LLC	05/05/2020	21,000.00	(USD)

Vu		Notus, LLC	05/05/2020	8,000.00	(USD)
Se		Notus, LLC	05/06/2020	3,000.00	(USD)
Sh		Notus, LLC	05/08/2020	10,000.00	(USD)
Ich		Boonruk Ruamkit Co., Ltd.	05/11/2020	5,000.00	(USD)
Bh		Notus, LLC	05/12/2020	2,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	05/14/2020	1,600.00	(USD)
Be		Notus, LLC	05/19/2020	10,000.00	(USD)
Bh		Notus, LLC	05/22/2020	7,000.00	(USD)
Vu		Notus, LLC	05/26/2020	5,000.00	(USD)
Pa		Notus, LLC	05/27/2020	18,000.00	(USD)
Se		Global E-Advantages	05/27/2020	3,000.00	(USD)
Ru		Boonruk Ruamkit Co., Ltd.	05/28/2020	7,000.00	(EUR)
Sc		Global E-Advantages	05/28/2020	1,000.00	(USD)
Vu		Notus, LLC	05/28/2020	5,000.00	(USD)
Ha		Notus, LLC	05/29/2020	30,000.00	(USD)
ST		Global E-Advantages	05/31/2020	1,000.00	(USD)
Ba		Notus, LLC	06/01/2020	3,730.00	(USD)
Ch		Notus, LLC	06/01/2020	10,000.00	(USD)
W		Global E-Advantages	06/01/2020	1,000.00	(USD)
Pa		Notus, LLC	06/02/2020	49,900.00	(USD)
Be		Notus, LLC	06/03/2020	7,000.00	(USD)
Be		Notus, LLC	06/04/2020	40,000.00	(USD)
Hu		Global E-Advantages	06/05/2020	1,000.00	(USD)
Mj		Boonruk Ruamkit Co., Ltd.	06/10/2020	10,000.00	(USD)
Nc		Notus, LLC	06/12/2020	20,000.00	(USD)
W		Boonruk Ruamkit Co., Ltd.	06/15/2020	9,500.00	(USD)
Be		Global E-Advantages	06/16/2020	5,000.00	(USD)
Se		Global E-Advantages	06/16/2020	6,000.00	(USD)
Sc		Global E-Advantages	06/17/2020	1,000.00	(USD)
Se		Global E-Advantages	06/17/2020	6,000.00	(USD)
M		Notus, LLC	06/23/2020	90,000.00	(USD)
Ra		IT Outsourcing Co., Ltd.	06/23/2020	5,000.00	(USD)
Vu		Global E-Advantages	06/23/2020	5,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	06/25/2020	1,915.00	(USD)
Bh		Global E-Advantages	06/30/2020	5,000.00	(USD)
M		Notus, LLC	07/02/2020	20,000.00	(USD)
Lu		Notus, LLC	07/03/2020	60,000.00	(USD)
Du		Notus, LLC	07/07/2020	20,000.00	(USD)
Br		Boonruk Ruamkit Co., Ltd.	07/08/2020	14,000.00	(EUR)
Bh		Boonruk Ruamkit Co., Ltd.	07/09/2020	1,295.00	(USD)
Se		Global E-Advantages	07/09/2020	2,500.00	(USD)
Ba		Global E-Advantages	07/14/2020	1,000.00	(USD)
Af		Boonruk Ruamkit Co., Ltd.	07/18/2020	1,000.00	(USD)
Ra		Global E-Advantages	07/20/2020	2,000.00	(USD)
Sm		Notus, LLC	07/22/2020	100,000.00	(USD)
Ax		Boonruk Ruamkit Co., Ltd.	07/23/2020	3,000.00	(EUR)
Bh		Boonruk Ruamkit Co., Ltd.	07/23/2020	1,300.00	(USD)
Mj		Boonruk Ruamkit Co., Ltd.	07/23/2020	20,000.00	(USD)



Ch		Notus, LLC	07/23/2020	20,000.00	(USD)
Vu		Global E-Advantages	07/29/2020	7,000.00	(USD)
No		Global E-Advantages	07/30/2020	10,000.00	(USD)
St		Notus, LLC	07/30/2020	125,000.00	(USD)
Vu		Global E-Advantages	07/30/2020	7,000.00	(USD)
Ro		Global E-Advantages	08/03/2020	1,000.00	(USD)
Ro		Notus, LLC	08/04/2020	10,000.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	08/10/2020	1,000.00	(EUR)
Se		Global E-Advantages	08/10/2020	2,000.00	(USD)
Ow		Global E-Advantages	08/13/2020	5,000.00	(USD)
Jag		Art Sea Group Ltd.	08/19/2020	50,000.00	(EUR)
Ke		Art Sea Group Ltd.	08/19/2020	117,352.00	(USD)
Se		Global E-Advantages	08/26/2020	3,000.00	(USD)
Nh		Boonruk Ruamkit Co., Ltd.	08/27/2020	5,000.00	(USD)
Vu		Global E-Advantages	08/31/2020	1,000.00	(USD)
Ro		Global E-Advantages	09/02/2020	10,000.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	09/03/2020	1,500.00	(EUR)
Jag		Trans-Konsalt MR Ltd.	09/03/2020	50,000.00	(EUR)
Va		Notus, LLC	09/08/2020	10,000.00	(USD)
Be		Global E-Advantages	09/09/2020	5,000.00	(USD)
Ay		Global E-Advantages	09/11/2020	10,000.00	(USD)
Be		Art Sea Group Ltd.	09/11/2020	74,100.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	09/11/2020	1,000.00	(EUR)
La		Notus, LLC	09/11/2020	250,000.00	(USD)
Ob		Global E-Advantages	09/13/2020	7,000.00	(USD)
St		Notus, LLC	09/14/2020	100,000.00	(USD)
Ba		Global E-Advantages	09/15/2020	21,030.00	(USD)
Ro		Global E-Advantages	09/15/2020	10,000.00	(USD)
Gu		Global E-Advantages	09/17/2020	10,000.00	(USD)
Ob		Global E-Advantages	09/18/2020	12,000.00	(USD)
Ob		Global E-Advantages	09/20/2020	10,000.00	(USD)
Be		Global E-Advantages	09/21/2020	6,000.00	(USD)
Be		Global E-Advantages	09/22/2020	6,000.00	(USD)
Ta		Boonruk Ruamkit Co., Ltd.	09/22/2020	1,000.00	(EUR)
M		Global E-Advantages	09/22/2020	5,000.00	(USD)
Wi		Global E-Advantages	09/22/2020	10,100.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	09/23/2020	1,000.00	(USD)
Gu		Global E-Advantages	09/23/2020	15,000.00	(USD)
Pa		Global E-Advantages	09/23/2020	2,000.00	(USD)
Ge		Boonruk Ruamkit Co., Ltd.	09/24/2020	4,000.00	(EUR)
Pa		Global E-Advantages	09/24/2020	1,990.00	(USD)
Ar		Global E-Advantages	09/25/2020	15,000.00	(USD)
Sc		Global E-Advantages	09/25/2020	5,000.00	(USD)
Ca		Global E-Advantages	09/29/2020	5,500.00	(USD)
Gu		Global E-Advantages	09/29/2020	17,000.00	(USD)
Ta		Boonruk Ruamkit Co., Ltd.	09/30/2020	11,000.00	(USD)
M		Global E-Advantages	09/30/2020	5,000.00	(USD)
Gu		Global E-Advantages	10/01/2020	7,000.00	(USD)

Ob		Global E-Advantages	10/02/2020	15,000.00	(USD)
Ob		Global E-Advantages	10/09/2020	9,000.00	(USD)
Bha		Boonruk Ruamkit Co., Ltd.	10/14/2020	1,300.00	(USD)
Guc		Shopostar, LLC	10/14/2020	22,000.00	(USD)
Ob		Shopostar, LLC	10/14/2020	12,000.00	(USD)
Aye		Shopostar, LLC	10/15/2020	2,000.00	(USD)
HH		Shopostar, LLC	10/19/2020	100,000.00	(USD)
Ma		Global E-Advantages	10/20/2020	6,000.00	(USD)
Set		Global E-Advantages	10/20/2020	1,000.00	(USD)
Guc		Shopostar, LLC	10/22/2020	5,000.00	(USD)
Axe		Boonruk Ruamkit Co., Ltd.	10/25/2020	10,000.00	(EUR)
Car		Shopostar, LLC	10/26/2020	1,000.00	(USD)
Afs		Boonruk Ruamkit Co., Ltd.	10/27/2020	1,000.00	(USD)
Bon		Boonruk Ruamkit Co., Ltd.	10/27/2020	10,000.00	(USD)
Ma		Global E-Advantages	10/27/2020	1,000.00	(USD)
O'B		Shopostar, LLC	10/27/2020	25,000.00	(USD)
Mo		Shopostar, LLC	10/28/2020	1,000.00	(USD)
Bha		Boonruk Ruamkit Co., Ltd.	10/29/2020	1,000.00	(USD)
Will		Shopostar, LLC	10/30/2020	10,000.00	(USD)
Will		Shopostar, LLC	11/02/2020	1,000.00	(USD)
Bon		Boonruk Ruamkit Co., Ltd.	11/03/2020	15,000.00	(USD)
Sim		Boonruk Ruamkit Co., Ltd.	11/03/2020	35,000.00	(USD)
Ver		Shopostar, LLC	11/04/2020	100,000.00	(USD)
Mo		Global E-Advantages	11/05/2020	1,000.00	(USD)
Set		Global E-Advantages	11/05/2020	4,600.00	(USD)
Ray		Global E-Advantages	11/06/2020	51,000.00	(USD)
Will		Global E-Advantages	11/06/2020	100,000.00	(USD)
Fon		Boonruk Ruamkit Co., Ltd.	11/09/2020	24,700.00	(USD)
Aye		Global E-Advantages	11/10/2020	27,000.00	(USD)
Bha		Boonruk Ruamkit Co., Ltd.	11/11/2020	1,430.00	(USD)
Bell		Global E-Advantages	11/12/2020	5,000.00	(USD)
Ray		Global E-Advantages	11/13/2020	25,500.00	(USD)
Afs		Boonruk Ruamkit Co., Ltd.	11/17/2020	3,800.00	(USD)
Bo		Global E-Advantages	11/17/2020	1,000.00	(USD)
Afs		Boonruk Ruamkit Co., Ltd.	11/18/2020	3,800.00	(USD)
Afs		Boonruk Ruamkit Co., Ltd.	11/18/2020	9,500.00	(USD)
Wa		Art Sea Group Ltd.	11/20/2020	11,000.00	(USD)
Bat		Boonruk Ruamkit Co., Ltd.	11/23/2020	1,000.00	(USD)
Bha		Boonruk Ruamkit Co., Ltd.	11/25/2020	1,220.00	(USD)
Le,		Global E-Advantages	11/25/2020	2,500.00	(USD)
Mit		Global E-Advantages	11/26/2020	10,000.00	(USD)
Wa		Boonruk Ruamkit Co., Ltd.	11/27/2020	1,492,223.68	(USD)
Mo		Global E-Advantages	11/30/2020	50,000.00	(USD)
Sch		Boonruk Ruamkit Co., Ltd.	12/01/2020	15,000.00	(EUR)
Will		Global E-Advantages	12/02/2020	10,000.00	(USD)
Will		Global E-Advantages	12/02/2020	1,000.00	(USD)
Ma		Boonruk Ruamkit Co., Ltd.	12/04/2020	1,000.00	(USD)
Har		Global E-Advantages	12/04/2020	10,000.00	(USD)

Lo		Global E-Advantages	12/07/2020	5,000.00	(USD)
Wi		Global E-Advantages	12/07/2020	3,000.00	(USD)
Ha		Shopostar, LLC	12/11/2020	20,000.00	(USD)
Pel		Groveen, LLC	12/15/2020	1,000.00	(USD)
Lo		Boonruk Ruamkit Co., Ltd.	12/16/2020	1,000.00	(USD)
Wi		Global E-Advantages	12/16/2020	20,000.00	(USD)
Lo		Groveen, LLC	12/17/2020	1,000.00	(USD)
Ha		Groveen, LLC	12/18/2020	8,000.00	(USD)
Ter		Notus, LLC	12/20/2020	5,000.00	(USD)
Gu		Global E-Advantages	12/21/2020	3,000.00	(USD)
Lo		Groveen, LLC	12/21/2020	8,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	12/22/2020	1,217.00	(USD)
Gu		Global E-Advantages	12/23/2020	3,000.00	(USD)
Wa		Art Sea Group Ltd.	12/25/2020	56,000.00	(USD)
Dr		Shopostar, LLC	12/28/2020	50,100.00	(USD)
Wi		Global E-Advantages	12/28/2020	10,000.00	(USD)
Mc		Global E-Advantages	12/29/2020	2,000.00	(USD)
Gu		Global E-Advantages	12/30/2020	1,000.00	(USD)
Go		Shopostar, LLC	01/03/2021	150,000.00	(USD)
W		Shopostar, LLC	01/04/2021	101,000.00	(USD)
Lo		Boonruk Ruamkit Co., Ltd.	01/05/2021	5,000.00	(USD)
Ha		Global E-Advantages	01/06/2021	31,289.00	(USD)
Dri		Shopostar, LLC	01/07/2021	5,100.00	(USD)
Wi		Global E-Advantages	01/07/2021	14,000.00	(USD)
Ma		Shopostar, LLC	01/10/2021	1,210.00	(USD)
Fry		Shopostar, LLC	01/11/2021	1,000.00	(USD)
Sal		Shopostar, LLC	01/11/2021	2,000.00	(USD)
He		Shopostar, LLC	01/12/2021	1,000.00	(USD)
Ow		Shopostar, LLC	01/12/2021	37,000.00	(USD)
Ha		Shopostar, LLC	01/13/2021	10,000.00	(USD)
Mc		Shopostar, LLC	01/13/2021	10,000.00	(USD)
Pa		Shopostar, LLC	01/15/2021	5,000.00	(USD)
Jag		Boonruk Ruamkit Co., Ltd.	01/19/2021	25,000.00	(EUR)
Ba		Global E-Advantages	01/20/2021	200,000.00	(USD)
Sc		Easy Com, LLC	01/21/2021	10,000.00	(USD)
Ter		Notus, LLC	01/21/2021	5,000.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	01/22/2021	5,000.00	(EUR)
Fo		Boonruk Ruamkit Co., Ltd.	01/23/2021	10,001.00	(USD)
Sal		Easy Com, LLC	01/25/2021	3,000.00	(USD)
Set		Easy Com, LLC	01/25/2021	5,000.00	(USD)
Jan		Boonruk Ruamkit Co., Ltd.	01/26/2021	12,000.00	(EUR)
Ke		Easy Com, LLC	01/26/2021	145,000.00	(USD)
Br		Easy Com, LLC	01/27/2021	10,000.00	(USD)
Ma		Boonruk Ruamkit Co., Ltd.	01/28/2021	1,000.00	(USD)
Mc		Easy Com, LLC	01/28/2021	10,001.00	(USD)
Sc		Shopostar, LLC	01/28/2021	10,000.00	(USD)
Nh		Boonruk Ruamkit Co., Ltd.	01/29/2021	5,000.00	(USD)
Ste		Shopostar, LLC	01/29/2021	20,000.00	(USD)

Val		Shopostar, LLC	01/29/2021	40,000.00	(USD)
Ca		Shopostar, LLC	01/30/2021	50,075.00	(USD)
Bo		Boonruk Ruamkit Co., Ltd.	02/01/2021	14,000.00	(USD)
Bh		Easy Com, LLC	02/03/2021	1,000.00	(USD)
Du		Easy Com, LLC	02/03/2021	2,000.00	(USD)
Wi		Easy Com, LLC	02/03/2021	5,000.00	(USD)
Ro		Easy Com, LLC	02/05/2021	5,050.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	02/08/2021	1,000.00	(EUR)
SW		Shopostar, LLC	02/08/2021	5,000.00	(USD)
Wi		Shopostar, LLC	02/08/2021	50,000.00	(USD)
De		Shopostar, LLC	02/09/2021	1,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	02/10/2021	1,000.00	(USD)
He		Shopostar, LLC	02/10/2021	5,000.00	(USD)
Ta		Grovec, LLC	02/10/2021	1,000.00	(USD)
Wa		Jared Goodyear	02/10/2021	10,000.00	(USD)
Ab		Boonruk Ruamkit Co., Ltd.	02/15/2021	3,000.00	(USD)
Po		Boonruk Ruamkit Co., Ltd.	02/16/2021	1,000.00	(USD)
He		Shopostar, LLC	02/16/2021	5,000.00	(USD)
Pa		Shopostar, LLC	02/16/2021	10,000.00	(USD)
Ste		Shopostar, LLC	02/16/2021	33,000.00	(USD)
Ro		Shopostar, LLC	02/17/2021	10,000.00	(USD)
Ma		Shopostar, LLC	02/18/2021	5,000.00	(USD)
Bla		Grovec, LLC	02/19/2021	1,000.00	(USD)
Sh		Shopostar, LLC	02/19/2021	25,000.00	(USD)
Set		Grovec, LLC	02/21/2021	1,400.00	(USD)
Bra		Boonruk Ruamkit Co., Ltd.	02/22/2021	1,000.00	(EUR)
Fit		Easy Com, LLC	02/22/2021	5,100.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	02/24/2021	1,525.00	(USD)
Bra		Boonruk Ruamkit Co., Ltd.	02/24/2021	49,000.00	(EUR)
Ma		Boonruk Ruamkit Co., Ltd.	02/24/2021	5,000.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	02/24/2021	3,000.00	(EUR)
Set		Grovec, LLC	02/24/2021	1,400.00	(USD)
Bra		Boonruk Ruamkit Co., Ltd.	02/25/2021	1,000.00	(EUR)
Ma		Grovec, LLC	02/25/2021	5,000.00	(USD)
Hu		Easy Com, LLC	02/26/2021	3,500.00	(USD)
Ny		Easy Com, LLC	02/26/2021	25,000.00	(USD)
Pa		Shopostar, LLC	02/26/2021	1,111.00	(USD)
Th		Easy Com, LLC	02/26/2021	5,000.00	(USD)
Ma		Easy Com, LLC	02/28/2021	5,000.00	(USD)
Bra		Boonruk Ruamkit Co., Ltd.	03/01/2021	10,000.00	(EUR)
Sar		Boonruk Ruamkit Co., Ltd.	03/01/2021	1,030.00	(USD)
Oc		Grovec, LLC	03/01/2021	10,000.00	(USD)
Ka		Boonruk Ruamkit Co., Ltd.	03/02/2021	4,960.00	(EUR)
Sar		Boonruk Ruamkit Co., Ltd.	03/02/2021	1,100.00	(USD)
Ma		Easy Com, LLC	03/02/2021	1,000.00	(USD)
Mc		Easy Com, LLC	03/02/2021	45,000.00	(USD)
Ow		Easy Com, LLC	03/02/2021	2,400.00	(USD)
De		Easy Com, LLC	03/03/2021	2,000.00	(USD)

Kar		Boonruk Ruamkit Co., Ltd.	03/03/2021	4,950.00	(EUR)
Ve		Boonruk Ruamkit Co., Ltd.	03/03/2021	1,000.00	(EUR)
Ke		Easy Com, LLC	03/03/2021	2,600.00	(USD)
O'		Easy Com, LLC	03/03/2021	50,000.00	(USD)
Sh		Easy Com, LLC	03/03/2021	2,000.00	(USD)
Sh		Easy Com, LLC	03/03/2021	4,000.00	(USD)
Sar		Boonruk Ruamkit Co., Ltd.	03/04/2021	4,150.00	(USD)
Ve		Boonruk Ruamkit Co., Ltd.	03/04/2021	11,500.00	(EUR)
Mc		Easy Com, LLC	03/04/2021	50,000.00	(USD)
Ny		Easy Com, LLC	03/04/2021	5,000.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	03/05/2021	1,000.00	(EUR)
Bra		Boonruk Ruamkit Co., Ltd.	03/06/2021	10,000.00	(EUR)
Um		Easy Com, LLC	03/06/2021	5,000.00	(USD)
Bo		Boonruk Ruamkit Co., Ltd.	03/07/2021	10,000.00	(USD)
Stu		Easy Com, LLC	03/07/2021	2,000.00	(USD)
Jag		Boonruk Ruamkit Co., Ltd.	03/08/2021	20,000.00	(EUR)
Po		Boonruk Ruamkit Co., Ltd.	03/08/2021	12,000.00	(USD)
Ny		Easy Com, LLC	03/08/2021	10,000.00	(USD)
Pa		Grovee, LLC	03/08/2021	2,989.00	(USD)
Pa		Grovee, LLC	03/08/2021	2,999.00	(USD)
Re		Easy Com, LLC	03/08/2021	10,001.00	(USD)
Sul		Easy Com, LLC	03/08/2021	30,000.00	(USD)
Lo		Easy Com, LLC	03/09/2021	50,000.00	(USD)
Ra		Grovee, LLC	03/09/2021	5,000.00	(USD)
Ca		Grovee, LLC	03/10/2021	1,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	03/10/2021	1,500.00	(USD)
Ma		Grovee, LLC	03/10/2021	5,000.00	(USD)
Ba		Easy Com, LLC	03/12/2021	10,000.00	(USD)
Ba		Easy Com, LLC	03/12/2021	15,100.00	(USD)
Fo		Boonruk Ruamkit Co., Ltd.	03/13/2021	1,000.00	(USD)
W		Easy Com, LLC	03/14/2021	1,500.00	(USD)
Fit		Easy Com, LLC	03/15/2021	3,000.00	(USD)
Go		Easy Com, LLC	03/15/2021	145,000.00	(USD)
Ke		Easy Com, LLC	03/15/2021	17,300.00	(USD)
Ka		Boonruk Ruamkit Co., Ltd.	03/15/2021	1,000.00	(EUR)
Ka		Boonruk Ruamkit Co., Ltd.	03/15/2021	4,200.00	(EUR)
Ma		Grovee, LLC	03/15/2021	2,000.00	(USD)
Sal		Easy Com, LLC	03/15/2021	1,000.00	(USD)
Bla		Easy Com, LLC	03/16/2021	5,600.00	(USD)
Ha		Easy Com, LLC	03/16/2021	50,000.00	(USD)
Bra		Boonruk Ruamkit Co., Ltd.	03/16/2021	1,000.00	(EUR)
Ob		Easy Com, LLC	03/16/2021	10,100.00	(USD)
Arz		Easy Com, LLC	03/17/2021	55,000.00	(USD)
Bu		Easy Com, LLC	03/17/2021	1,000.00	(USD)
Stu		Easy Com, LLC	03/17/2021	3,000.00	(USD)
Bu		Easy Com, LLC	03/18/2021	1,000.00	(USD)
Dr		Easy Com, LLC	03/19/2021	1,000.00	(USD)
Gu		Easy Com, LLC	03/19/2021	9,550.00	(USD)

Hay		Easy Com, LLC	03/19/2021	5,001.00	(USD)
Sar		Boonruk Ruamkit Co., Ltd.	03/19/2021	1,085.00	(USD)
O'B		Easy Com, LLC	03/19/2021	101,250.00	(USD)
Ras		Easy Com, LLC	03/19/2021	1,000.00	(USD)
Coc		Easy Com, LLC	03/20/2021	1,000.00	(USD)
Fitz		Easy Com, LLC	03/21/2021	50,000.00	(USD)
Ma		Easy Com, LLC	03/21/2021	5,000.00	(USD)
Mc		Groove, LLC	03/22/2021	25,000.00	(USD)
Mo		Easy Com, LLC	03/22/2021	5,000.00	(USD)
She		Easy Com, LLC	03/23/2021	28,000.00	(USD)
STo		Groove, LLC	03/23/2021	4,000.00	(USD)
Bab		Groove, LLC	03/24/2021	20,000.00	(USD)
Sch		Boonruk Ruamkit Co., Ltd.	03/24/2021	1,000.00	(EUR)
Bab		Groove, LLC	03/25/2021	20,000.00	(USD)
Ken		Groove, LLC	03/25/2021	40,000.00	(USD)
Kha		Easy Com, LLC	03/25/2021	250,000.00	(USD)
Bha		Boonruk Ruamkit Co., Ltd.	03/25/2021	1,000.00	(USD)
Fon		Boonruk Ruamkit Co., Ltd.	03/25/2021	1,000.00	(USD)
Ma		Boonruk Ruamkit Co., Ltd.	03/25/2021	5,000.00	(USD)
Sch		Boonruk Ruamkit Co., Ltd.	03/25/2021	3,000.00	(EUR)
Ray		Groove, LLC	03/25/2021	1,000.00	(USD)
Ris		Groove, LLC	03/25/2021	50,000.00	(USD)
Ken		Groove, LLC	03/26/2021	7,000.00	(USD)
Ber		Boonruk Ruamkit Co., Ltd.	03/26/2021	51,000.00	(EUR)
Fitz		Easy Com, LLC	03/27/2021	2,000.00	(USD)
Stu		Easy Com, LLC	03/27/2021	5,000.00	(USD)
Wa		Boonruk Ruamkit Co., Ltd.	03/28/2021	136,000.00	(USD)
Ma		Easy Com, LLC	03/28/2021	5,000.00	(USD)
Ari		Easy Com, LLC	03/29/2021	92,173.20	(USD)
Bab		Easy Com, LLC	03/29/2021	45,004.45	(USD)
Car		Easy Com, LLC	03/29/2021	1,200.00	(USD)
Her		Easy Com, LLC	03/29/2021	90,000.00	(USD)
Kha		Shopostar, LLC	03/29/2021	250,000.00	(USD)
Jag		Boonruk Ruamkit Co., Ltd.	03/29/2021	17,000.00	(EUR)
Wo		Boonruk Ruamkit Co., Ltd.	03/29/2021	20,000.00	(USD)
Mo		Easy Com, LLC	03/29/2021	50,000.00	(USD)
Ma		Easy Com, LLC	03/30/2021	50,000.00	(USD)
Ma		Easy Com, LLC	03/31/2021	5,000.00	(USD)
Coc		Easy Com, LLC	04/02/2021	1,000.00	(USD)
Del		Easy Com, LLC	04/02/2021	1,000.00	(USD)
Ma		Easy Com, LLC	04/02/2021	5,000.00	(USD)
Aw		Boonruk Ruamkit Co., Ltd.	04/02/2021	5,000.00	(USD)
Bla		Easy Com, LLC	04/03/2021	15,000.00	(USD)
Fitz		Easy Com, LLC	04/03/2021	20,000.00	(USD)
Bo		Boonruk Ruamkit Co., Ltd.	04/04/2021	20,000.00	(USD)
Gw		Easy Com, LLC	04/05/2021	1,300.00	(USD)
Ma		Easy Com, LLC	04/05/2021	1,000.00	(USD)
Mu		Easy Com, LLC	04/05/2021	10,000.00	(USD)

Mu		Shopostar, LLC	04/05/2021	100,000.00	(USD)
Bu		Boonruk Ruamkit Co., Ltd.	04/05/2021	1,100.00	(USD)
Ma		Easy Com, LLC	04/06/2021	2,500.00	(USD)
Afs		Boonruk Ruamkit Co., Ltd.	04/06/2021	2,000.00	(USD)
W		Boonruk Ruamkit Co., Ltd.	04/06/2021	27,000.00	(USD)
W		Easy Com, LLC	04/06/2021	1,000.00	(USD)
Gid		Grovec, LLC	04/08/2021	1,500.00	(USD)
Sc		Grovec, LLC	04/08/2021	2,500.00	(USD)
For		Easy Com, LLC	04/09/2021	100,000.00	(USD)
Bo		Boonruk Ruamkit Co., Ltd.	04/09/2021	10,200.00	(USD)
Fo		Boonruk Ruamkit Co., Ltd.	04/10/2021	9,000.00	(USD)
Bra		Boonruk Ruamkit Co., Ltd.	04/11/2021	1,000.00	(EUR)
Am		Easy Com, LLC	04/12/2021	10,000.00	(USD)
Lo		Easy Com, LLC	04/12/2021	1,000.00	(USD)
Eb		Boonruk Ruamkit Co., Ltd.	04/12/2021	10,000.00	(USD)
Sar		Boonruk Ruamkit Co., Ltd.	04/12/2021	1,816.00	(USD)
Da		Easy Com, LLC	04/13/2021	9,000.00	(USD)
Ris		Easy Com, LLC	04/13/2021	50,000.00	(USD)
Riv		Easy Com, LLC	04/13/2021	7,000.00	(USD)
Eb		Boonruk Ruamkit Co., Ltd.	04/13/2021	1,000.00	(USD)
Wa		Boonruk Ruamkit Co., Ltd.	04/13/2021	70,000.00	(USD)
Wi		Easy Com, LLC	04/13/2021	100,000.00	(USD)
Ob		Easy Com, LLC	04/14/2021	20,000.00	(USD)
Ob		Easy Com, LLC	04/14/2021	25,000.00	(USD)
Riv		Easy Com, LLC	04/14/2021	5,000.00	(USD)
Ny		Easy Com, LLC	04/15/2021	5,000.00	(USD)
Sar		Boonruk Ruamkit Co., Ltd.	04/15/2021	3,080.00	(USD)
Lo		Shopostar, LLC	04/16/2021	5,000.00	(USD)
Sar		Boonruk Ruamkit Co., Ltd.	04/16/2021	1,365.00	(USD)
Le		Shopostar, LLC	04/17/2021	30,000.00	(USD)
Ha		Shopostar, LLC	04/18/2021	15,000.00	(USD)
Gid		Shopostar, LLC	04/19/2021	2,050.00	(USD)
Ha		Shopostar, LLC	04/19/2021	15,000.00	(USD)
Lo		Shopostar, LLC	04/19/2021	1,000.00	(USD)
Ne		Shopostar, LLC	04/19/2021	76,500.00	(USD)
Ny		Shopostar, LLC	04/19/2021	10,000.00	(USD)
Ow		Shopostar, LLC	04/19/2021	1,250.00	(USD)
Pa		Shopostar, LLC	04/19/2021	120,000.00	(USD)
Bo		Boonruk Ruamkit Co., Ltd.	04/19/2021	20,000.00	(USD)
Sh		Shopostar, LLC	04/19/2021	50,000.00	(USD)
Lo		Shopostar, LLC	04/20/2021	1,000.00	(USD)
Bo		Boonruk Ruamkit Co., Ltd.	04/20/2021	1,144.33	(USD)
Ric		Boonruk Ruamkit Co., Ltd.	04/20/2021	100,000.00	(USD)
W		Boonruk Ruamkit Co., Ltd.	04/20/2021	35,000.00	(USD)
Jan		Boonruk Ruamkit Co., Ltd.	04/21/2021	3,000.00	(EUR)
Ric		Boonruk Ruamkit Co., Ltd.	04/21/2021	95,000.00	(USD)
Sar		Boonruk Ruamkit Co., Ltd.	04/21/2021	4,883.00	(USD)
Bla		Boonruk Ruamkit Co., Ltd.	04/22/2021	2,000.00	(USD)

Dr		Boonruk Ruamkit Co., Ltd.	04/22/2021	4,015.00	(USD)
Ge		Boonruk Ruamkit Co., Ltd.	04/22/2021	5,000.00	(USD)
Jan		Boonruk Ruamkit Co., Ltd.	04/22/2021	3,000.00	(EUR)
Ma		Boonruk Ruamkit Co., Ltd.	04/22/2021	7,200.00	(USD)
Sh		Boonruk Ruamkit Co., Ltd.	04/22/2021	70,000.00	(USD)
Ma		Boonruk Ruamkit Co., Ltd.	04/23/2021	2,500.00	(USD)
Ke		Easy Com, LLC	04/28/2021	10,000.00	(USD)
Sh		IT Outsourcing Co., Ltd.	04/28/2021	5,500.00	(USD)
W		Easy Com, LLC	04/28/2021	2,500.00	(USD)
HA		Easy Com, LLC	04/29/2021	5,000.00	(USD)
Mc		IT Outsourcing Co., Ltd.	04/29/2021	3,000.00	(USD)
Na		IT Outsourcing Co., Ltd.	04/29/2021	10,000.00	(USD)
Wi		Easy Com, LLC	04/29/2021	43,000.00	(USD)
Ob		Easy Com, LLC	04/30/2021	8,000.00	(USD)
Kle		IT Outsourcing Co., Ltd.	05/01/2021	5,000.00	(USD)
W		Easy Com, LLC	05/01/2021	11,500.00	(USD)
Bh		Easy Com, LLC	05/03/2021	1,000.00	(USD)
Ho		Easy Com, LLC	05/03/2021	5,000.00	(USD)
Vic		Easy Com, LLC	05/03/2021	10,000.00	(USD)
Ob		Easy Com, LLC	05/04/2021	10,000.00	(USD)
Ba		Boonruk Ruamkit Co., Ltd.	05/04/2021	90,000.00	(USD)
Ke		Boonruk Ruamkit Co., Ltd.	05/04/2021	56,000.00	(USD)
Ke		Boonruk Ruamkit Co., Ltd.	05/04/2021	88,340.00	(USD)
Ab		IT Outsourcing Co., Ltd.	05/05/2021	2,000.00	(USD)
He		IT Outsourcing Co., Ltd.	05/05/2021	6,678.76	(USD)
He		IT Outsourcing Co., Ltd.	05/05/2021	6,680.00	(USD)
Wa		Easy Com, LLC	05/05/2021	1,000.00	(USD)
Wi		Easy Com, LLC	05/05/2021	2,000.00	(USD)
Bel		Easy Com, LLC	05/06/2021	1,000.00	(USD)
Du		Easy Com, LLC	05/06/2021	40,000.00	(USD)
Ma		Easy Com, LLC	05/06/2021	1,000.00	(USD)
Mi		Easy Com, LLC	05/06/2021	10,000.00	(USD)
Sh		IT Outsourcing Co., Ltd.	05/06/2021	3,300.00	(USD)
Tru		Easy Com, LLC	05/06/2021	5,000.00	(USD)
Co		Easy Com, LLC	05/07/2021	1,000.00	(USD)
Pr		Easy Com, LLC	05/07/2021	1,010.00	(USD)
Jan		Easy Com, LLC	05/10/2021	10,000.00	(USD)
O'		Easy Com, LLC	05/10/2021	1,000.00	(USD)
Ke		Boonruk Ruamkit Co., Ltd.	05/10/2021	64,683.00	(USD)
Ter		Easy Com, LLC	05/10/2021	1,000.00	(USD)
Mc		Easy Com, LLC	05/11/2021	3,000.00	(USD)
Pa		Easy Com, LLC	05/12/2021	100,000.00	(USD)
Riv		Easy Com, LLC	05/12/2021	10,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	05/12/2021	1,000.00	(USD)
Ah		Easy Com, LLC	05/13/2021	50,000.00	(USD)
Ca		Easy Com, LLC	05/13/2021	1,000.00	(USD)
W		Easy Com, LLC	05/13/2021	9,000.00	(USD)
W		Easy Com, LLC	05/13/2021	1,000.00	(USD)



Pr		Easy Com, LLC	05/14/2021	6,510.00	(USD)
Riv		Easy Com, LLC	05/15/2021	10,000.00	(USD)
W		Easy Com, LLC	05/15/2021	5,000.00	(USD)
Br		IT Outsourcing Co., Ltd.	05/17/2021	1,500.00	(EUR)
M		IT Outsourcing Co., Ltd.	05/17/2021	3,000.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	05/17/2021	1,000.00	(EUR)
Kh		Easy Com, LLC	05/18/2021	250,000.00	(USD)
Ah		Easy Com, LLC	05/19/2021	10,000.00	(USD)
Ca		Easy Com, LLC	05/19/2021	1,600.00	(USD)
Pa		Easy Com, LLC	05/19/2021	1,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	05/19/2021	1,000.00	(USD)
Ah		Easy Com, LLC	05/20/2021	100,000.00	(USD)
Lo		Easy Com, LLC	05/20/2021	7,500.00	(USD)
Ro		Easy Com, LLC	05/20/2021	10,000.00	(USD)
Tr		Easy Com, LLC	05/20/2021	2,500.00	(USD)
W		IT Outsourcing Co., Ltd.	05/20/2021	10,000.00	(EUR)
W		IT Outsourcing Co., Ltd.	05/20/2021	10,000.00	(USD)
Ro		Easy Com, LLC	05/21/2021	50,000.00	(USD)
Sc		Boonruk Ruamkit Co., Ltd.	05/21/2021	1,000.00	(EUR)
Da		Easy Com, LLC	05/22/2021	1,000.00	(USD)
Sc		Grovec, LLC	05/23/2021	2,000.00	(USD)
De		Easy Com, LLC	05/24/2021	10,000.00	(USD)
M		Shopostar, LLC	05/24/2021	50,000.00	(USD)
De		Shopostar, LLC	05/25/2021	10,000.00	(USD)
Do		Shopostar, LLC	05/25/2021	200,000.00	(USD)
Tri		Shopostar, LLC	05/25/2021	1,000.00	(USD)
Po		Shopostar, LLC	05/26/2021	2,000.00	(USD)
St		Shopostar, LLC	05/26/2021	7,500.00	(USD)
Tai		IT Outsourcing Co., Ltd.	05/26/2021	1,000.00	(USD)
U		Shopostar, LLC	05/26/2021	25,000.00	(USD)
Ro		Easy Com, LLC	05/29/2021	32,000.00	(USD)
Sc		IT Outsourcing Co., Ltd.	05/31/2021	1,000.00	(EUR)
Br		IT Outsourcing Co., Ltd.	06/02/2021	1,500.00	(EUR)
W		Easy Com, LLC	06/02/2021	11,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	06/02/2021	1,400.00	(USD)
Re		Easy Com, LLC	06/03/2021	46,000.00	(USD)
Sc		IT Outsourcing Co., Ltd.	06/04/2021	9,000.00	(EUR)
W		Easy Com, LLC	06/04/2021	9,000.00	(USD)
Br		IT Outsourcing Co., Ltd.	06/06/2021	1,000.00	(EUR)
Ch		IT Outsourcing Co., Ltd.	06/07/2021	1,000.00	(EUR)
Lo		Easy Com, LLC	06/07/2021	15,000.00	(USD)
M		Easy Com, LLC	06/07/2021	100,000.00	(USD)
Ra		IT Outsourcing Co., Ltd.	06/07/2021	1,000.00	(EUR)
Ra		Easy Com, LLC	06/07/2021	10,000.00	(USD)
Sc		IT Outsourcing Co., Ltd.	06/09/2021	11,000.00	(USD)
Tri		Shopostar, LLC	06/09/2021	19,000.00	(USD)
CA		Easy Com, LLC	06/11/2021	5,000.00	(USD)
Ch		IT Outsourcing Co., Ltd.	06/11/2021	4,075.00	(EUR)

Ba		IT Outsourcing Co., Ltd.	06/14/2021	10,000.00	(USD)
Ma		Easy Com, LLC	06/14/2021	15,000.00	(USD)
Ra		IT Outsourcing Co., Ltd.	06/14/2021	17,000.00	(EUR)
Car		Easy Com, LLC	06/15/2021	2,000.00	(USD)
Col		Easy Com, LLC	06/16/2021	5,000.00	(USD)
Bh		Boonruk Ruamkit Co., Ltd.	06/16/2021	1,113.00	(USD)
Bal		Easy Com, LLC	06/17/2021	2,000.00	(USD)
Chi		IT Outsourcing Co., Ltd.	06/17/2021	10,000.00	(USD)
Chi		IT Outsourcing Co., Ltd.	06/17/2021	5,660.00	(EUR)
Cat		IT Outsourcing Co., Ltd.	06/18/2021	11,000.00	(USD)
Ho		Easy Com, LLC	06/18/2021	50,000.00	(USD)
Sch		IT Outsourcing Co., Ltd.	06/18/2021	5,000.00	(EUR)
Tai		IT Outsourcing Co., Ltd.	06/18/2021	10,000.00	(USD)
CAI		Easy Com, LLC	06/21/2021	8,000.00	(USD)
Pat		Easy Com, LLC	06/21/2021	100,000.00	(USD)
She		Easy Com, LLC	06/21/2021	2,000.00	(USD)
CAI		Easy Com, LLC	06/22/2021	2,000.00	(USD)
Ols		Easy Com, LLC	06/22/2021	50,000.00	(USD)
Po		Easy Com, LLC	06/23/2021	20,000.00	(USD)
Ra		IT Outsourcing Co., Ltd.	06/23/2021	5,000.00	(USD)
Val		Easy Com, LLC	06/23/2021	100,000.00	(USD)
Sul		Easy Com, LLC	06/24/2021	10,000.00	(USD)
Ma		Boonruk Ruamkit Co., Ltd.	06/26/2021	50,600.00	(USD)
Ro		Shopostar, LLC	06/28/2021	200,000.00	(USD)
Wh		Easy Com, LLC	06/28/2021	12,000.00	(USD)
Kle		IT Outsourcing Co., Ltd.	06/30/2021	1,500.00	(USD)
Hu		Shopostar, LLC	07/02/2021	1,000.00	(USD)
Ra		IT Outsourcing Co., Ltd.	07/02/2021	24,000.00	(EUR)
Aw		Boonruk Ruamkit Co., Ltd.	07/03/2021	5,000.00	(USD)
Bra		IT Outsourcing Co., Ltd.	07/05/2021	1,000.00	(EUR)
Chi		IT Outsourcing Co., Ltd.	07/05/2021	11,635.00	(EUR)
Ra		IT Outsourcing Co., Ltd.	07/05/2021	3,700.00	(USD)
Co		Shopostar, LLC	07/07/2021	3,200.00	(USD)
Co		Shopostar, LLC	07/07/2021	3,230.00	(USD)
Da		Shopostar, LLC	07/07/2021	12,000.00	(USD)
Um		Shopostar, LLC	07/08/2021	25,000.00	(USD)
Yo		Shopostar, LLC	07/08/2021	7,500.00	(USD)
Ro		Shopostar, LLC	07/09/2021	100,000.00	(USD)
Wi		Shopostar, LLC	07/13/2021	10,000.00	(USD)
Fle		IT Outsourcing Co., Ltd.	07/14/2021	1,110.00	(EUR)
Fle		IT Outsourcing Co., Ltd.	07/15/2021	1,010.00	(EUR)
Pel		Shopostar, LLC	07/19/2021	20,000.00	(USD)
Sch		Shopostar, LLC	07/19/2021	10,000.00	(USD)
Riv		Shopostar, LLC	07/20/2021	10,000.00	(USD)
Bla		Shopostar, LLC	07/21/2021	10,000.00	(USD)
Ro		Easy Com, LLC	07/21/2021	10,000.00	(USD)
Ma		Shopostar, LLC	07/22/2021	5,000.00	(USD)
Fle		IT Outsourcing Co., Ltd.	07/23/2021	1,000.00	(EUR)

Sch		Boonruk Ruamkit Co., Ltd.	07/24/2021	1,500.00	(EUR)
Ma		Shopostar, LLC	07/27/2021	3,000.00	(USD)
Bro		Shopostar, LLC	07/28/2021	7,000.00	(USD)
Roc		IT Outsourcing Co., Ltd.	07/28/2021	20,000.00	(USD)
Rod		Notus, LLC	07/28/2021	10,000.00	(USD)
Car		Shopostar, LLC	07/29/2021	2,700.00	(USD)
Kav		Shopostar, LLC	07/29/2021	20,000.00	(USD)
Kav		Shopostar, LLC	07/30/2021	20,000.00	(USD)
She		Shopostar, LLC	07/30/2021	10,000.00	(USD)
Pel		Shopostar, LLC	08/02/2021	20,000.00	(USD)
CAI		Shopostar, LLC	08/03/2021	10,000.00	(USD)
CAI		Shopostar, LLC	08/03/2021	3,000.00	(USD)
Per		Shopostar, LLC	08/03/2021	1,000.00	(USD)
Pre		Shopostar, LLC	08/03/2021	25,000.00	(USD)
Fer		Shopostar, LLC	08/05/2021	10,000.00	(USD)
CAI		Shopostar, LLC	08/06/2021	80,000.00	(USD)
Fle		IT Outsourcing Co., Ltd.	08/06/2021	1,040.00	(EUR)
Per		Shopostar, LLC	08/08/2021	9,000.00	(USD)
Per		Shopostar, LLC	08/09/2021	9,000.00	(USD)
Ma		Shopostar, LLC	08/10/2021	4,200.00	(USD)
She		Shopostar, LLC	08/10/2021	25,000.00	(USD)
CAI		Shopostar, LLC	08/11/2021	30,000.00	(USD)
St.		Shopostar, LLC	08/11/2021	10,500.00	(USD)
Fle		IT Outsourcing Co., Ltd.	08/12/2021	1,300.00	(EUR)
Sch		IT Outsourcing Co., Ltd.	08/12/2021	1,000.00	(EUR)
Fon		Shopostar, LLC	08/15/2021	1,000.00	(USD)
Fer		Shopostar, LLC	08/16/2021	10,000.00	(USD)
Ma		Shopostar, LLC	08/16/2021	25,000.00	(USD)
Fle		IT Outsourcing Co., Ltd.	08/17/2021	1,020.00	(EUR)
Riv		Shopostar, LLC	08/18/2021	30,000.00	(USD)
Pre		Shopostar, LLC	08/20/2021	5,000.00	(USD)
Klei		IT Outsourcing Co., Ltd.	08/23/2021	1,500.00	(USD)
Oh,		Shopostar, LLC	08/23/2021	7,500.00	(USD)
St.		Shopostar, LLC	08/23/2021	1,000.00	(USD)
Tho		Shopostar, LLC	08/23/2021	10,000.00	(USD)
Fle		IT Outsourcing Co., Ltd.	08/24/2021	2,510.00	(EUR)
Sta		Shopostar, LLC	08/24/2021	75,000.00	(USD)
Poe		Shopostar, LLC	08/25/2021	26,000.00	(USD)
Pan		Shopostar, LLC	08/26/2021	23,000.00	(USD)
Cl		Shopostar, LLC	08/27/2021	50,000.00	(USD)
Um		Shopostar, LLC	08/27/2021	25,000.00	(USD)
Rob		Shopostar, LLC	08/28/2021	63,000.00	(USD)
Bur		Shopostar, LLC	08/31/2021	35,000.00	(USD)
Fle		IT Outsourcing Co., Ltd.	08/31/2021	1,000.00	(EUR)
Me		IT Outsourcing Co., Ltd.	08/31/2021	10,000.00	(EUR)
St.		Shopostar, LLC	08/31/2021	4,680.00	(USD)
St.		Shopostar, LLC	09/01/2021	29,512.00	(USD)
Oh,		Shopostar, LLC	09/02/2021	8,441.60	(USD)

St.		Shopostar, LLC	09/03/2021	4,321.00	(USD)
Vic		Shopostar, LLC	09/03/2021	15,000.00	(USD)
U		Shopostar, LLC	09/09/2021	3,000.00	(USD)
Afs		Auro Advantages, LLC	09/10/2021	150,000.00	(USD)
Oc		Shopostar, LLC	09/10/2021	20,000.00	(USD)
Co		Shopostar, LLC	09/13/2021	1,000.00	(USD)
Ka		Shopostar, LLC	09/13/2021	10,000.00	(USD)
Fle		IT Outsourcing Co., Ltd.	09/14/2021	1,000.00	(EUR)
Afs		Easy Com, LLC	09/20/2021	20,000.00	(USD)
Afs		Shopostar, LLC	09/20/2021	26,000.00	(USD)
Ka		Shopostar, LLC	11/09/2021	10,000.00	(USD)

## Exhibit 7 - Transfers Between Defendants

Date	Order Party	Beneficiary Party	USD Amount	Source
9/16/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 48,650.00	Bank of America
9/20/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 47,420.00	Bank of America
9/24/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 97,320.00	Bank of America
9/26/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 78,670.00	Bank of America
9/30/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 72,610.00	Bank of America
9/30/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 83,770.00	Bank of America
10/7/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 91,225.00	Bank of America
10/8/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 84,757.00	Bank of America
10/15/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 72,344.00	Bank of America
10/16/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 81,125.00	Bank of America
10/17/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 146,420.00	Bank of America
10/21/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 148,070.00	Bank of America
10/24/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 126,595.00	Bank of America
10/29/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 81,341.00	Bank of America
11/4/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 114,575.00	Bank of America
11/6/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 48,225.00	Bank of America
11/12/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 71,942.00	Bank of America
11/18/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 107,336.00	Bank of America
11/20/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 97,880.00	Bank of America
11/26/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 54,975.00	Bank of America
12/6/2019	NOTUS LLC	AWARE CHOICE LIMITED	\$ 7,260.00	Bank of America
1/8/2020	NOTUS LLC	AWARE CHOICE LTD	\$ 36,340.00	Wise US, Inc
1/9/2020	NOTUS LLC	AWARE CHOICE LIMITED	\$ 86,100.00	Bank of America
1/15/2020	NOTUS LLC	AWARE CHOICE LTD	\$ 62,650.00	Wise US, Inc
2/24/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 8,546.00	Bank of America
3/2/2020	NOTUS LLC	TRANS-KONSALT MR LTD	\$ 94,200.00	Bank of America
3/3/2020	NOTUS LLC	TRANS KONSALT MR LTD	\$ 89,710.00	Bank of America
3/4/2020	NOTUS LLC	TRANS- KONSALT MR LTD	\$ 95,870.00	Bank of America
3/16/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/16/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/18/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/18/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/19/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/19/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/20/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/20/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/23/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/23/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/24/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/24/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/24/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/24/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/24/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/25/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/25/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/26/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
3/26/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 3,000.00	Bank of America
4/3/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 49,300.00	Bank of America
4/6/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 3,500.00	Bank of America
4/8/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 39,720.00	Bank of America
4/9/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,100.00	Bank of America
4/16/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,720.00	Bank of America
4/17/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
4/20/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,750.00	Bank of America
4/24/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,400.00	Bank of America
4/27/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,910.00	Bank of America
5/5/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,950.00	Bank of America
5/7/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,440.00	Bank of America
5/11/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,900.00	Bank of America
5/13/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,600.00	Bank of America
5/15/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,300.00	Bank of America
5/19/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 11,240.00	M&T Bank

5/15/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,300.00	Bank of America
5/19/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 11,240.00	M&T Bank
5/19/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,870.00	Bank of America
5/22/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,900.00	Bank of America
5/26/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,150.00	Bank of America
5/26/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 1,400.00	Bank of America
5/27/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,220.00	Bank of America
5/28/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,500.00	Bank of America
5/29/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,910.00	Bank of America
6/1/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,300.00	Bank of America
6/4/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,600.00	Bank of America
6/10/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,650.00	Bank of America
6/15/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 9,750.00	M&T Bank
6/15/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,300.00	Bank of America
6/16/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 73,700.00	M&T Bank
6/16/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,490.00	Bank of America
6/17/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,350.00	Bank of America
6/17/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,700.00	Bank of America
6/18/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 53,220.00	M&T Bank
6/19/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 34,700.00	M&T Bank
6/19/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,900.00	Bank of America
6/22/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 37,660.00	M&T Bank
6/22/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 1,900.00	Bank of America
6/23/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,100.00	Bank of America
6/23/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 1,900.00	Deutsche Bank
6/25/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 39,250.00	M&T Bank
6/26/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,800.00	Bank of America
6/29/2020	NOTUS LLC	BOONRUK RUAMKIT CO., LTD.	\$ 43,250.00	Bank of America
7/1/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 73,700.00	M&T Bank
7/1/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,400.00	Bank of America
7/1/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 3,990.00	Bank of America
7/2/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,550.00	Bank of America
7/7/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,200.00	Bank of America
7/7/2020	NOTUS LLC	MAYON SOLUTIONS LLC	\$ 3,260.00	Bank of America
7/8/2020	NOTUS LLC	ALLA SKALA	\$ 7,460.00	Bank of America
7/8/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,400.00	Bank of America
7/9/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 45,720.00	M&T Bank
7/9/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,600.00	Bank of America
7/13/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,900.00	Bank of America
7/14/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 83,100.00	M&T Bank
7/16/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 39,800.00	M&T Bank
7/20/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,750.00	Bank of America
7/21/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 41,400.00	M&T Bank
7/21/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,900.00	Bank of America
7/23/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 49,200.00	Bank of America
7/27/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 29,170.00	M&T Bank
7/30/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 41,800.00	M&T Bank
7/30/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,660.00	Bank of America
7/31/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,950.00	Bank of America
8/3/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,800.00	Bank of America
8/4/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 38,950.00	M&T Bank
8/4/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,100.00	Bank of America
8/4/2020	NOTUS LLC	MAYON SOLUTIONS LLC	\$ 37,000.00	Bank of America
8/5/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 49,050.00	Bank of America
8/6/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,100.00	Bank of America
8/10/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,800.00	Bank of America
8/11/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,750.00	Bank of America
8/12/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,200.00	Bank of America
8/14/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 52,650.00	M&T Bank
8/19/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 48,800.00	M&T Bank
8/20/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,810.00	Bank of America
8/25/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 63,410.00	M&T Bank

8/25/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,350.00	Bank of America
8/27/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 31,200.00	M&T Bank
8/28/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,800.00	Bank of America
9/1/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,950.00	Bank of America
9/2/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 43,660.00	M&T Bank
9/2/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,700.00	Bank of America
9/3/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,250.00	Bank of America
9/3/2020	NOTUS LLC	MAYON SOLUTIONS LLC	\$ 3,260.00	Bank of America
9/8/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 72,450.00	M&T Bank
9/8/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,900.00	Bank of America
9/9/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,400.00	Bank of America
9/10/2020	NOTUS LLC	MAYON SOLUTIONS LLC	\$ 1,810.00	Bank of America
9/11/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,100.00	Bank of America
9/15/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 79,610.00	M&T Bank
9/15/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,900.00	Bank of America
9/17/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 59,400.00	M&T Bank
9/17/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,700.00	Bank of America
9/18/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,200.00	Bank of America
9/21/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 147,300.00	M&T Bank
9/24/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 89,400.00	M&T Bank
9/24/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,150.00	Bank of America
9/28/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 46,300.00	M&T Bank
9/28/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,550.00	Bank of America
9/29/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 29,100.00	M&T Bank
10/1/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 126.00	Bank of America
10/1/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 64,800.00	M&T Bank
10/1/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,300.00	Bank of America
10/5/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,290.00	Bank of America
10/6/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 89,400.00	M&T Bank
10/6/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,150.00	Bank of America
10/7/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,840.00	Bank of America
10/8/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,600.00	Bank of America
10/9/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 43,700.00	M&T Bank
10/13/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,100.00	M&T Bank
10/13/2020	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 820.00	Bank of America
10/13/2020	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 2,440.00	Bank of America
10/13/2020	GLOBAL E-ADVANTAGES LLC	Mayon Solutions LLC	\$ 820.00	M&T Bank
10/14/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 26,520.00	M&T Bank
10/15/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,250.00	Bank of America
10/19/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,300.00	Bank of America
10/21/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,700.00	Bank of America
10/23/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 35,700.00	M&T Bank
10/26/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 600.00	Bank of America
10/26/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 61,800.00	Bank of America
10/27/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 97,200.00	Bank of America
10/28/2020	NOTUS LLC	BORYS KONOVALENKO	\$ 5,000.00	Bank of America
10/29/2020	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 3,260.00	Bank of America
11/2/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 95,600.00	Bank of America
11/3/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 98,600.00	Bank of America
11/4/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 88,700.00	Bank of America
11/9/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 97,350.00	M&T Bank
11/10/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 89,300.00	M&T Bank
11/18/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,700.00	M&T Bank
11/19/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,350.00	M&T Bank
11/20/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 83,900.00	M&T Bank
11/27/2020	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 2,320.00	Bank of America
12/2/2020	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 2,940.00	Bank of America
12/10/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 65,900.00	M&T Bank
12/14/2020	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 20,700.00	Bank of America
12/14/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 97,900.00	Bank of America
12/15/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 57,200.00	Bank of America
12/16/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 34,300.00	M&T Bank



12/17/2020	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 56,100.00	Bank of America
12/21/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 63,700.00	M&T Bank
12/22/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 54,500.00	Bank of America
12/24/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 95,700.00	M&T Bank
12/24/2020	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 2,320.00	Bank of America
12/24/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 98,400.00	Bank of America
12/29/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,150.00	M&T Bank
12/30/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 52,600.00	M&T Bank
1/6/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 67,900.00	Bank of America
1/11/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 78,300.00	Bank of America
1/11/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 70,600.00	Bank of America
1/14/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 96,350.00	Bank of America
1/15/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 50,000.00	Bank of America
1/19/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 94,300.00	Bank of America
1/28/2021	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 117,000.00	Bank of America
1/28/2021	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 104,000.00	Bank of America
1/28/2021	GLOBAL E-ADVANTAGES LLC	Mayon Solutions LLC	\$ 104,000.00	M&T Bank
1/28/2021	GLOBAL E-ADVANTAGES LLC	Mayon Solutions LLC	\$ 117,000.00	M&T Bank
1/29/2021	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 96,000.00	Bank of America
2/1/2021	GLOBAL E-ADVANTAGES LLC	MAYON SOLUTIONS LLC	\$ 99,930.00	Bank of America
2/1/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 139,950.00	Bank of America
2/2/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 142,550.00	Bank of America
2/2/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 1,000.00	Bank of America
2/4/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 78,400.00	Bank of America
2/5/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 69,100.00	Bank of America
2/8/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 96,200.00	Bank of America
2/22/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 99,340.00	Bank of America
2/23/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 19,840.00	Bank of America
3/5/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,900.00	Bank of America
3/8/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 49,190.00	Bank of America
3/10/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 79,150.00	Bank of America
3/12/2021	NOTUS LLC	MAYON SOLUTIONS LLC	\$ 31,724.00	Bank of America
3/22/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 87,910.00	Bank of America
3/23/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 53,150.00	Bank of America
3/30/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 31,460.00	Bank of America
4/20/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 144,100.00	Bank of America
5/7/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 133,790.00	Bank of America
5/12/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 97,410.00	Bank of America
7/2/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 89,150.00	Bank of America
7/7/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 94,550.00	Bank of America
7/13/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 112,750.00	Bank of America
7/15/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 79,120.00	Bank of America
7/20/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 78,170.00	Bank of America
7/23/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 91,550.00	Bank of America
7/27/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 91,300.00	Bank of America
8/4/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 89,550.00	Bank of America
8/9/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 131,300.00	Bank of America
8/10/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 88,000.00	Bank of America
8/11/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 76,360.00	Bank of America
8/13/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 81,490.00	Bank of America
8/17/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 73,700.00	Bank of America
8/30/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 125,400.00	Bank of America
9/17/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 11,900.00	Bank of America

# Exhibit 8 - Transfers from Front Companies to Notus

Date	Order Party	Beneficiary Party	USD Amount	Source
2/25/2019	SHOPOSTAR LLC	Notus LLC	\$ 71,700.00	Bank of America
2/25/2019	SHOPOSTAR LLC	Notus LLC	\$ 71,700.00	Bank of America
3/14/2019	SHOPOSTAR LLC	Notus LLC	\$ 42,781.00	Bank of America
3/14/2019	SHOPOSTAR LLC	Notus LLC	\$ 42,781.00	Bank of America
5/19/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 11,240.00	M&T Bank
6/15/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 9,750.00	M&T Bank
6/16/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 73,700.00	M&T Bank
6/18/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 53,220.00	M&T Bank
6/19/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 34,700.00	M&T Bank
6/22/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 37,660.00	M&T Bank
6/25/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 39,250.00	M&T Bank
7/1/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 73,700.00	M&T Bank
7/9/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 45,720.00	M&T Bank
7/14/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 83,100.00	M&T Bank
7/16/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 39,800.00	M&T Bank
7/21/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 41,400.00	M&T Bank
7/27/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 29,170.00	M&T Bank
7/30/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 41,800.00	M&T Bank
8/4/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 38,950.00	M&T Bank
8/14/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 52,650.00	M&T Bank
8/19/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 48,800.00	M&T Bank
8/25/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 63,410.00	M&T Bank
8/27/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 31,200.00	M&T Bank
9/2/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 43,660.00	M&T Bank
9/8/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 72,450.00	M&T Bank
9/15/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 79,610.00	M&T Bank
9/17/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 59,400.00	M&T Bank
9/21/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 147,300.00	M&T Bank
9/24/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 89,400.00	M&T Bank
9/28/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 46,300.00	M&T Bank
9/29/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 29,100.00	M&T Bank
10/1/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 126.00	Bank of America
10/1/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 64,800.00	M&T Bank
10/6/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 89,400.00	M&T Bank
10/9/2020	GLOBAL E-ADVANTAGES LLC	Notus LLC	\$ 43,700.00	M&T Bank

# Exhibit 9 - Transfers to Layering Companies

Date	Order Party	Beneficiary Party	USD Amount
1/29/2018	WEALTHY DEVELOPMENTS LP	EPAYMENTS SYSTEMS LTD CLIENTS FUND	\$ 15,350.00
3/2/2018	WEALTHY DEVELOPMENTS LP	EPAYMENTS SYSTEMS LTD CLIENTS FUND	\$ 18,100.00
7/15/2019	AURO ADVANTAGES	EPAYMENTS SYSTEMS LTD CLIENTS FUND	\$ 3,467.10
4/3/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 49,300.00
4/8/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 39,720.00
4/9/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,100.00
4/16/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,720.00
4/20/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,750.00
4/24/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,400.00
4/27/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,910.00
5/5/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,950.00
5/7/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,440.00
5/11/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,900.00
5/13/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,600.00
5/15/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,300.00
5/19/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,870.00
5/22/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,900.00
5/26/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,150.00
5/27/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,220.00
5/28/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,500.00
5/29/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,910.00
6/1/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,300.00
6/4/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,600.00
6/10/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,650.00
6/15/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,300.00
6/16/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,490.00
6/17/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,350.00
6/17/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,700.00
6/19/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,900.00
6/23/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,100.00
6/26/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,800.00
6/29/2020	NOTUS LLC	BOONRUK RUAMKIT CO., LTD.	\$ 43,250.00
7/1/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,400.00
7/2/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,550.00
7/7/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,200.00
7/8/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,400.00
7/9/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,600.00
7/13/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,900.00
7/20/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,750.00
7/21/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,900.00
7/23/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 49,200.00
7/30/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,660.00
7/31/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,950.00
8/3/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,800.00
8/4/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,100.00
8/5/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 49,050.00
8/6/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,100.00
8/10/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,800.00
8/11/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,750.00
8/12/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,200.00
8/20/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,810.00
8/25/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,350.00
8/28/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,800.00
9/1/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,950.00
9/2/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,700.00
9/3/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,250.00
9/8/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,900.00
9/9/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,400.00
9/11/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,100.00
9/15/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,900.00
9/17/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,700.00

9/18/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,200.00
9/24/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,150.00
9/28/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,550.00
10/1/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,300.00
10/5/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,290.00
10/6/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,150.00
10/7/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,840.00
10/8/2020	NOTUS LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,600.00
10/13/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,100.00
10/14/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 26,520.00
10/15/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 46,250.00
10/19/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 44,300.00
10/21/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 43,700.00
10/23/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 35,700.00
10/26/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 61,800.00
10/27/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 97,200.00
11/2/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 95,600.00
11/3/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 98,600.00
11/4/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 88,700.00
11/9/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 97,350.00
11/10/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 89,300.00
11/18/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,700.00
11/19/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 45,350.00
11/20/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 83,900.00
12/10/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 65,900.00
12/14/2020	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 20,700.00
12/14/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 97,900.00
12/15/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 57,200.00
12/16/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 34,300.00
12/17/2020	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 56,100.00
12/21/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 63,700.00
12/22/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 54,500.00
12/24/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 95,700.00
12/24/2020	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 98,400.00
12/29/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 48,150.00
12/30/2020	GLOBAL E-ADVANTAGES LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 52,600.00
1/6/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 67,900.00
1/11/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 78,300.00
1/11/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 70,600.00
1/14/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 96,350.00
1/15/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 50,000.00
1/19/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 94,300.00
2/1/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 139,950.00
2/2/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 142,550.00
2/2/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 1,000.00
2/4/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 78,400.00
2/5/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 69,100.00
2/8/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 96,200.00
2/22/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 99,340.00
2/23/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 19,840.00
3/5/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 47,900.00
3/8/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 49,190.00
3/10/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 79,150.00
3/22/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 87,910.00
3/23/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 53,150.00
3/30/2021	GROVEE LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 31,460.00
4/20/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 144,100.00
5/7/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 133,790.00
5/12/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 97,410.00
7/2/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 89,150.00
7/7/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 94,550.00
7/13/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 112,750.00

7/15/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 79,120.00
7/20/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 78,170.00
7/23/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 91,550.00
7/27/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 91,300.00
8/4/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 89,550.00
8/9/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 131,300.00
8/10/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 88,000.00
8/11/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 76,360.00
8/13/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 81,490.00
8/17/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 73,700.00
8/30/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 125,400.00
9/17/2021	SHOPOSTAR LLC	BOONRUK RUAMKIT CO.,LTD.	\$ 11,900.00