

Exhibit C_Declaration of Jonathan Zarley

**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, *et al.*,

Defendants.

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DECLARATION OF PLAINTIFF JONATHAN ZARLEY

I, JONATHAN ZARLEY, declare under penalty of perjury as follows:

1. I am a named Plaintiff in the above-captioned proceeding.
2. I am a citizen and resident of Kailua-Kona, Hawaii.
3. I am over the age of 18, am personally familiar with, and have personal knowledge of the facts contained herein, which I could and would testify competently thereto.
4. I first heard about RoFx in January 2020 after I saw a series of Facebook advertisements. I was intrigued by RoFx because it was touted as totally automated and passive. Specifically, I continued to do research online via Google searches and RoFx.net itself. I remember reading the following representations:
 - 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.”

5. Persuaded by these promises of a secure, guaranteed, and passive income stream, I registered for a RoFx.net account on or about January 27, 2020 and made my first contribution the following day.

6. Between January 2020 and May 2021, I invested a total of \$2,057,000.00¹ with RoFx.net. Each time I elected to deposit funds into my RoFx.net account, the website directed me to send funds to several different entities. I did contribute as directed, sending to each beneficiary my contributions as identified below:

Beneficiary	Total Dollars Contributed
Notus LLC	\$1,165,000.00
Global E- Advantages LLC	\$335,000.00
Shopostar LLC	\$557,000.00
Total:	\$2,057,000.00

7. Additionally, my wire transaction receipts are attached hereto as **Exhibit 1**.

8. None of the money that I transferred to these beneficiaries has been returned; therefore, the total sum of my damages is \$2,057,000.00, which is broken down by entity in the chart above.

¹ In the Amended Complaint and my previous Declarations, I stated that my total contribution to RoFx was \$2,042,000.00; this was a misstatement. After a re-review of my records, the total amount of my contribution was \$2,067,000.00 (including \$10,000.00 to Aware Choice Limited), but with respect to the Motion Defendants, my total loss is \$2,057,000.00. The true and accurate amounts are reflected in this Declaration and evidenced by my attached wire receipts.

Pursuant to Section 1746 of Title 28 of the United States Code, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 7.00, 2023

Location: Kailua-Kona, Hawaii (City, State)

DocuSigned by:

Jonathan Zarley

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Jonathan Zarley

Plaintiff

Zarley_Exhibit 1

All deposits were made from American Savings Bank 3268
except the six \$25,000 deposits which were Wells Fargo 4284.

JAN 28 2020	OUTGOING WIRE 28622 AWARE CHOICE LIMITED	- \$1,000.00 \$14,537.46	⋮
Details			
Statement Description: OUTGOING WIRE 28622 AWARE CHOICE LIMITED			
Date: 1/28/2020			
Type: Debit			

JAN 30 2020	OUTGOING WIRE 28720 AWARE CHOICE LIMITED	- \$9,000.00 \$5,326.46	⋮
Details			
Statement Description: OUTGOING WIRE 28720 AWARE CHOICE LIMITED			
Date: 1/30/2020			
Type: Debit			

FEB 6 2020	OUTGOING WIRE 29100 NOTUS LLC	- \$2,000.00 \$79,402.08	⋮
Details			
Statement Description: OUTGOING WIRE 29100 NOTUS LLC			
Date: 2/6/2020			
Type: Debit			

FEB 10 2020	OUTGOING WIRE 29268 NOTUS LLC	- \$18,000.00 \$61,087.40	⋮
Details			
Statement Description: OUTGOING WIRE 29268 NOTUS LLC			
Date: 2/10/2020			
Type: Debit			

FEB 13 2020	OUTGOING WIRE 29582 NOTUS LLC	- \$60,000.00 \$8,269.60	⋮
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FEB 21 2020	OUTGOING WIRE 29952 NOTUS LLC	- \$5,000.00 \$88,130.38	⋮
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Details

Statement Description:
OUTGOING WIRE 29952 NOTUS LLC
Date:
2/21/2020
Type:
Debit

FEB 26 2020	OUTGOING WIRE 30213 NOTUS LLC	- \$80,000.00 \$277,847.76	⋮
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Details

Statement Description:
OUTGOING WIRE 30213 NOTUS LLC
Date:
2/26/2020
Type:
Debit

FEB 27 2020	OUTGOING WIRE 30342 NOTUS LLC	- \$190,000.00 \$86,832.76	⋮
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Details

Statement Description:
OUTGOING WIRE 30342 NOTUS LLC
Date:
2/27/2020
Type:
Debit

MAR 4 2020	OUTGOING WIRE 30714 NOTUS LLC	- \$130,000.00 \$14,250.68	⋮
Details			
Statement Description: OUTGOING WIRE 30714 NOTUS LLC			
Date: 3/4/2020			
Type: Debit			

APR 17 2020	OUTGOING WIRE 33331 NOTUS LLC	- \$40,000.00 \$19,617.94	⋮
Details			
Statement Description: OUTGOING WIRE 33331 NOTUS LLC			
Date: 4/17/2020			
Type: Debit			

MAY 12 2020	OUTGOING WIRE 36387 NOTUS LLC	- \$100,000.00 \$3,954.22	⋮
Details			
Statement Description: OUTGOING WIRE 36387 NOTUS LLC			
Date: 5/12/2020			
Type: Debit			

JUN 5 2020	OUTGOING WIRE 38457 NOTUS LLC	- \$90,000.00 \$10,808.85	⋮
Details			
Statement Description: OUTGOING WIRE 38457 NOTUS LLC			
Date: 6/5/2020			
Type: Debit			

JUL 2 2020	OUTGOING WIRE 40092 NOTUS LLC	- \$45,000.00 \$19,273.22	⋮
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Details

Statement Description:
OUTGOING WIRE 40092 NOTUS LLC
Date:
7/2/2020
Type:
Debit

JUL 16 2020	OUTGOING WIRE 41017 NOTUS LLC	- \$77,500.00 \$22,884.86	⋮
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Details

Statement Description:
OUTGOING WIRE 41017 NOTUS LLC
Date:
7/16/2020
Type:
Debit

⊕ 07/28/20	WT FED#01253 KEYBANK NATIONAL A /FTR/BNF=Notus LLC SRF# OW00000882658665 TRN#200728017253 RFB# OW00000882658665	\$25,000.00
⊕ 07/29/20	WT FED#08374 KEYBANK NATIONAL A /FTR/BNF=Notus LLC SRF# OW00000885287222 TRN#200729189647 RFB# OW00000885287222	\$25,000.00
⊕ 08/03/20	WT FED#02011 KEYBANK NATIONAL A /FTR/BNF=Notus LLC SRF# OW00000886414279 TRN#200803219679 RFB# OW00000886414279	\$25,000.00
⊕ 08/03/20	WT FED#01376 KEYBANK NATIONAL A /FTR/BNF=Notus LLC SRF# OW00000892540220 TRN#200803218481 RFB# OW00000892540220	\$25,000.00
⊕ 08/28/20	WT FED#08993 KEYBANK NATIONAL A /FTR/BNF=Notus LLC SRF# OW00000927570504 TRN#200828189846 RFB# OW00000927570504	\$25,000.00

SEP 16 2020	OUTGOING WIRE 45030 NOTUS LLC	- \$177,500.00 \$29,348.78	⋮
<p>Details</p> <hr/> <p>Statement Description: OUTGOING WIRE 45030 NOTUS LLC</p> <p>Date: 9/16/2020</p> <p>Type: Debit</p>			
⊕ 09/16/20	WT FED#07579 KEYBANK NATIONAL A /FTR/BNF=Notus LLC SRF# OW00000955777110 TRN#200916168695 RFB# OW00000955777110	\$25,000.00	

DEC 18 2020	OUTGOING WIRE 51451 SHOPOSTAR,LLC	- \$150,000.00 \$508,966.70	⋮
<p>Details</p> <hr/> <p>Statement Description: OUTGOING WIRE 51451 SHOPOSTAR,LLC</p> <p>Date: 12/18/2020</p> <p>Type: Debit</p>			

DEC 18 2020	OUTGOING WIRE 51450 SHOPOSTAR,LLC	- \$150,000.00 \$659,036.70	⋮
<p>Details</p> <hr/> <p>Statement Description: OUTGOING WIRE 51450 SHOPOSTAR,LLC</p> <p>Date: 12/18/2020</p> <p>Type: Debit</p>			

DEC 21 2020	OUTGOING WIRE 51644 SHOPOSTAR,LLC	- \$190,000.00 \$316,783.64	⋮
Details			
Statement Description: OUTGOING WIRE 51644 SHOPOSTAR,LLC			
Date: 12/21/2020			
Type: Debit			

DEC 23 2020	OUTGOING WIRE 51811 GLOBAL E-ADVANTAGES LLC	- \$110,000.00 \$201,058.27	⋮
Details			
Statement Description: OUTGOING WIRE 51811 GLOBAL E-ADVANTAGES LLC			
Date: 12/23/2020			
Type: Debit			

DEC 31 2020	OUTGOING WIRE 52362 GLOBAL E-ADVANTAGES LLC	- \$150,000.00 \$98,906.96	⋮
Details			
Statement Description: OUTGOING WIRE 52362 GLOBAL E-ADVANTAGES LLC			
Date: 12/31/2020			
Type: Debit			

JAN 4 2021	OUTGOING WIRE 52541 GLOBAL E-ADVANTAGES LLC	- \$75,000.00 \$36,284.17	⋮
Details			
Statement Description: OUTGOING WIRE 52541 GLOBAL E-ADVANTAGES LLC			
Date: 1/4/2021			
Type: Debit			

MAY 26 2021	OUTGOING WIRE 63839 SHOPOSTAR LLC	- \$67,000.00 \$7,538.32	⋮
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Details

Statement Description:
OUTGOING WIRE 63839 SHOPOSTAR LLC
Date:
5/26/2021
Type:
Debit