

Exhibit A :

Plaintiff Roman Leonov

**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.

DECLARATION OF PLAINTIFF ROMAN LEONOV

I, ROMAN LEONOV, 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 Miami, Florida.
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 registered for a RoFx.net account on or about May of 2020.
5. Between December 2020 and April 2021, I invested a total of \$202,100 with RoFx.net. Specifically, I sent a total of 9 wire transfers to Global E Advantages LLC, Easy Com LLC, Grovee LLC, and Shopostar LLC.
6. During that same time period, RoFx.net allowed me to make two withdrawals from my account. Specifically, I succeeded in withdrawing approximately \$13,565 in USD.
7. The USD withdrawals were wire transferred to my bank account by two entities:
 - a. Boonruk Ruamkit Co., Ltd, and
 - b. IT Outsourcing Co., Ltd
8. Screenshots of the wire transfers are attached after my signature.

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: August 3, 2022

Location: Hallandale, FL (City, State)



Roman Leonov

Plaintiff



Business Adv Fundamentals - 0243: Account Activity Transaction Details

Post date: 05/14/2021

Amount: 8,680.00

Type: Credit

Description: WIRE TYPE:INTL IN DATE:210514 TIME:0734
ET TRN:2021051400195716
SEQ:OR21200900/484723 ORIG:IT
OUTSOURCING CO.,LTD. ID: [REDACTED] 3759 PMT
DET: \$20.00 FEE
DEDUCTINV.NO.IT202105020

Merchant name: IT OUTSOURCING CO.,LTD.


Transaction category: Uncategorized: Pending



Business Adv Fundamentals - 0243: Account Activity Transaction Details

Post date: 04/27/2021

Amount: 4,885.00

Type: Credit

Description: WIRE TYPE:INTL IN DATE:210427 TIME:0526
ET TRN:2021042700138907
SEQ:OR21172299/336239 ORIG:BOONRUK
RUAMKIT CO.,LTD. ID: [REDACTED] 8574 PMT DET:
\$15.00 FEE DEDUCTINV.NO.202104084

Merchant name: BOONRUK RUAMKIT CO.,LTD.



Transaction category: Income: Deposits