

Exhibit A_Declaration of 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 Hollywood, 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 first learned of RoFx in November of 2019 through promotions on Facebook and Reddit and via Trustpilot reviews. I remember reading the following representations about the platform:
 - 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.”
5. To confirm the platform’s features, I researched RoFx on MyFxBook.com and Trustpilot, where I saw trading information and reviews suggesting the platform. I also read many press releases and related content, including an article published by The Investing Online.

6. Relying on these representations, I registered for a RoFx.net account on or about May of 2020 and made my first investment in September of that same year.

7. Around October of 2020, the RoFx.net owners published news stories on Yahoo Finance and the Associated Press, discussing RoFx's unique robotic trading approach and Warren Buffet's interest in the platform.

8. Between December 2020 and April 2021, I invested a total of \$202,100 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—which I did, contributing my deposits through my company Lust & Leonov, P.C. Each beneficiary and my total contribution is identified below:

Beneficiary	Total Dollars Contributed
Global E Advantages LLC	\$33,100.00
Easy Com LLC	\$93,500.00
Grovec LLC	\$16,500.00
Shopostar LLC	\$59,000.00
Total:	\$202,100.00

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

10. None of the money that I transferred to these beneficiaries has been returned; therefore, the total sum of my damages is \$202,100.00, which is broken down by entity in the chart above.

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 8.00, 2023

Location: hollywood, FL (City, State)

DocuSigned by:

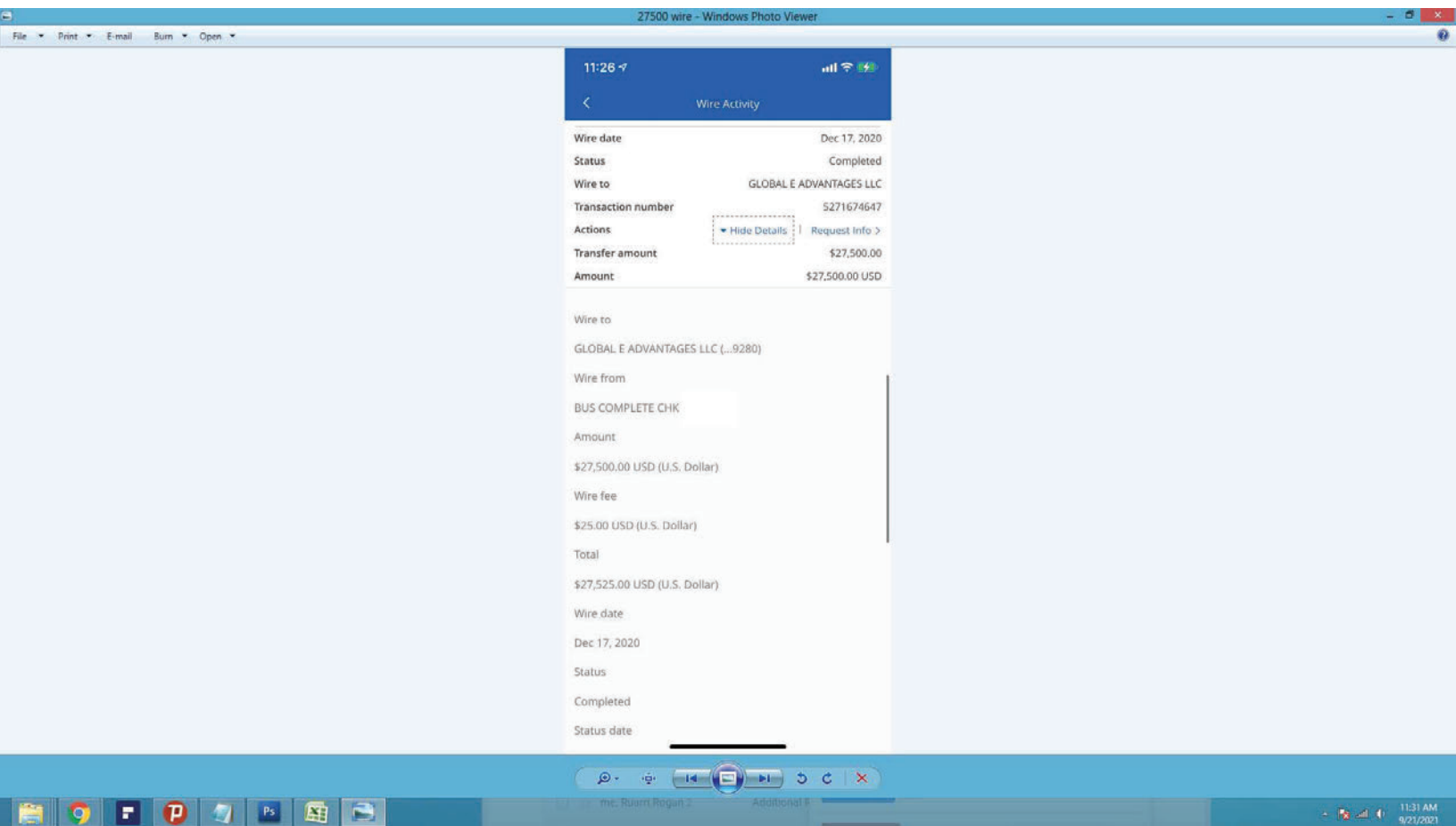
Roman Leonov

B5EBA049360E4DB...

Roman Leonov

Plaintiff

Leonov_Exhibit 1



LEONOV, P.C. | Account # 8981

| December 1, 2020 to December 31, 2020

12/30/20 TRANSFER LUST & LEONOV, P.C.-GLOBAL E-ADVANTAGES Confirmation# 0534933297

-5,600.00



Your checking account

| January 1, 2021 to January 31, 2021

01/12/21	WIRE TYPE:BOOK OUT DATE:210112 TIME:1039 ET TRN:2021011200291133 RELATED	-9,000.00
	REF:324334142 BNF:SHOPOSTAR LLC ID: [REDACTED] 1507 PMT DET:PMNT INV OICE 73364.5	
	DATE: 12/01/20	

Confirm Transfer



We've scheduled your wire.

Account details

Wire to

Shopostar LLC (...1507)

Wire from

TOTAL BUS CHK

Wire status

In transit

Transaction number

5277788016

Sender information

Wire date

Feb 12, 2021

Wire amount

\$50,000.00 USD (U.S. Dollars)

Done

[Print this Page](#)

Transfer status: In Process

Confirmation Number: 330033798

Transfer Accounts

From: Business Fundamentals Chk -

To: EASY COM LLC (Chase Bank)

Transfer Details

Send amount

Send amount: \$11,000.00

Additional fee: \$5.00

Transfer description

Transfer dates

Frequency: One time, immediately

Delivery speed: Next Business Day

Delivery method: ACH

Start on date: 03/02/2021

Estimated delivery date: 03/03/2021

Note:The receiving bank may make funds available later than this.

Send email to recipient

Email to: support@rofx.net

Email from: billing@valelawgroup.com

Subject: Money Transfer from LUST & LEONOV, P.C.

Message: Hi, \$11000 is being transferred electronically to your account at Chase Bank. Contact me directly if you have any questions. I've chosen to have this message sent from my bank to confirm that the transfer is scheduled.
Regards, LUST & LEONOV, P.C.

Business Advantage 360

How can we help you?

- Accounts
- Bill Pay
- Transfer | Zelle®
- Business Services
- Special Offers & Deals
- Tools & Investing
- Open an Account
- Help & Support

Send money to/from other banks, or to someone else using an account number

- Make Transfer
- Transfer Activity
- Add Account/Recipient
- Manage Accounts/Recipients



Your transfer has been received. To edit your scheduled transfers, go to the [Transfer Activity](#).

Printable version

A confirmation email will be sent to you soon. The Confirmation Number verifies that funds have been submitted to the recipient.

You may print this page for reference purposes.

Quick Help

Use this screen to obtain your confirmation number.

What can I do?

Obtain your confirmation number and print a copy.

Make another transfer.

More information about transfers

Confirmation Number: 330994728

From: Business Adv Fundamentals - 0243 :

To: easy com llc (Chase Bank)

Delivery speed: Next Business Day

Delivery method: ACH

Amount: \$14,500.00

Fee: \$5.00

Frequency: One time, immediately

Start on date: 03/10/2021

Estimated arrival date: 03/11/2021

Email to recipient : Email to support@rofx.net

Email from billing@valelawgroup.com

Subject Money Transfer from LUST & LEONOV, P.C.

Message Hi,

\$14,500.00 is being transferred electronically to your account at Chase Bank.

Contact me directly if you have any questions. I've chosen to have this message sent from my bank to confirm that the transfer is scheduled.

Regards, LUST & LEONOV, P.C.

Make Another Transfer

Secure Area

Sign Out

- Locations
- Contact Us
- Browse with Specialist
- Privacy
- Security
- Online Banking Service Agreement
- Advertising Practices



Online Banking

Business Adv Fundamentals -

Print

All Transactions

Date	Description	Status	Amount	Available Balance
03/16/2021	Wire Transfer Fee	C	-30.00	18,750.10
03/16/2021	WIRE TYPE:WIRE OUT DATE:210316 TIME:0906 ET	C	-18,000.00	18,780.10

Confirm Transfer

Account details

Wire to

EASY COM LLC (...5893)

Wire from

TOTAL BUS CHK [REDACTED]

Wire status

In transit

Transaction number

5283449265

Sender information

Wire date

Apr 5, 2021

Wire amount

\$50,000.00 USD (U.S. Dollars)

Outgoing wire transfer fee

\$25.00 USD (U.S. Dollars)

Total

\$50,025.00 USD (U.S. Dollars)

Your account activity will show separate charges for wire amount and wire transfer fee.

Done

Wire date	Apr 8, 2021
Status	Pending
Wire to	GROVEE LLC
Transaction number	5283837811
Actions	<div style="border: 1px dashed gray; padding: 2px; display: inline-block;"> ▼ Hide Details </div> Edit Cancel
Transfer amount	\$16,500.00
Amount	\$16,500.00 USD

Wire to

GROVEE LLC (...5659)

Wire from

TOTAL BUS CHK [REDACTED]

Amount

\$16,500.00 USD (U.S. Dollar)

Wire fee

\$25.00 USD (U.S. Dollar)

Total

\$16,525.00 USD (U.S. Dollar)

Wire date

Apr 8, 2021

Status

Pending

Status date