

# **Exhibit B\_Declaration of Mitchell Parent**

**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 MITCHELL PARENT**

I, MITCHELL PARENT, 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 Palmetto, 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 heard about RoFx.net through a series of Facebook ads that were published sometime between March and April of 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.”
5. Intrigued by this product, I conducted a Google search looking for anything I could find about “rofx.” This led me to trading information published on MyFxBook.com, reviews on TrustPilot, and articles about Warren Buffet’s interest in the platform.
6. Relying on these representations, I registered for a RoFx.net account in early 2020.

7. Between April 2020 and May 2021, I invested a total of \$491,000 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, with each beneficiary and my total contribution identified below:

Beneficiary	Total Dollars Contributed
Notus LLC	\$186,000.00
Easy Com LLC	\$5,000.00
Shopostar LLC	\$300,000.00
<b>Total:</b>	<b>\$491,000.00</b>

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

9. None of the money that I transferred to these beneficiaries has been returned; therefore, the total sum of my damages is \$491,000.00, 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: Palmetto, FL (City, State)

DocuSigned by:  
*Mitchell Parent*  
ABD3B7761AAA439...

**Mitchell Parent**

*Plaintiff*

# Parent\_ Exhibit 1

**(1)**

Beneficiary Account Name: Notus LLC  
Beneficiary Address: 102 COUNTRY CLUB DR, GRAND ISLAND, NY 14072-2584  
Account Number: [REDACTED] 2270  
ABA Routing Number: [REDACTED] 0077

Beneficiary Bank: KeyBank  
SWIFT: KEYBUS33  
Beneficiary Bank Address: 529 Elmwood Avenue Buffalo, NY, 14222

Amount: 20,000.00 USD  
Payment Reference: pmnt invoice 71387.1 dated 07.04.2020

**(2)**

Beneficiary Account Name: Notus LLC  
Beneficiary Address: 102 COUNTRY CLUB DR, GRAND ISLAND, NY 14072-2584  
Account Number: [REDACTED] 2270  
ABA Routing Number: [REDACTED] 0077

Beneficiary Bank: KeyBank  
SWIFT: KEYBUS33  
Beneficiary Bank Address: 529 Elmwood Avenue Buffalo, NY, 14222

Amount: 16,000.00 USD  
Payment Reference: pmnt invoice 71387.2 dated 13.04.2020

**(3)**

Beneficiary Account Name: Notus LLC  
Beneficiary Address: 102 COUNTRY CLUB DR, GRAND ISLAND, NY 14072-2584  
Account Number: [REDACTED] 2270  
ABA Routing Number: [REDACTED] 0077

Beneficiary Bank: KeyBank  
SWIFT: KEYBUS33  
Beneficiary Bank Address: 529 Elmwood Avenue Buffalo, NY, 14222

Amount: 50,000.00 USD  
Payment Reference: pmnt invoice 71387.3 dated 23.06.2020

**(4)**

Beneficiary Account Name: Shopostar, LLC  
Beneficiary Address: 7887 E BELLEVIEW AVE, STE 1100, ENGLEWOOD, 80111-6097,  
Colorado, United States  
Account Number: [REDACTED] 1507  
ABA Routing Number: [REDACTED] 9593

Beneficiary Bank: Bank of America  
SWIFT: BOFAUS3N  
Beneficiary Bank Address: 100 N Tryon St, STE 170, Charlotte, NC 28202, US

Amount: 100,000.00 USD  
Payment Reference: pmnt invoice 71387.5 dated 03.11.2020

**(5)**

Beneficiary Account Name: Notus LLC  
Beneficiary Address: 102 COUNTRY CLUB DR, GRAND ISLAND, NY 14072-2584  
Account Number: [REDACTED] 2270  
ABA Routing Number: [REDACTED] 0077

Beneficiary Bank: KeyBank  
SWIFT: KEYBUS33  
Beneficiary Bank Address: 529 Elmwood Avenue Buffalo, NY, 14222

Amount: 100,000.00 USD  
Payment Reference: pmnt invoice 71387.4 dated 04.08.2020

**(6)**

Beneficiary Account Name: Shopostar, LLC  
Beneficiary Address: 7887 E BELLEVIEW AVE, STE 1100, ENGLEWOOD, 80111-6097,  
Colorado, United States  
Account Number: [REDACTED] 1507  
ABA Routing Number: [REDACTED] 9593

Beneficiary Bank: Bank of America  
SWIFT: BOFAUS3N  
Beneficiary Bank Address: 100 N Tryon St, STE 170, Charlotte, NC 28202, US

Amount: 100,000.00 USD  
Payment Reference: pmnt invoice 71387.6 dated 08.12.2020

**(7)**

Beneficiary Account Name: Shopostar, LLC  
Beneficiary Address: 7887 E BELLEVIEW AVE, STE 1100, ENGLEWOOD, 80111-6097,  
Colorado, United States  
Account Number: [REDACTED] 1507  
ABA Routing Number: [REDACTED] 9593

Beneficiary Bank: Bank of America  
SWIFT: BOFAUS3N  
Beneficiary Bank Address: 100 N Tryon St, STE 170, Charlotte, NC 28202, US

Amount: 100,000.00 USD  
Payment Reference: pmnt invoice 71387.7 dated 18.04.2021

**(8)**

Beneficiary Account Name: EASY COM LLC.  
Beneficiary Address: 155 Fleet Street, Portsmouth, NH, 03801, United States  
Account Number: [REDACTED] 5893  
ABA Routing Number: [REDACTED] 0021

Beneficiary Bank: CHASE  
SWIFT: CHASUS33  
Beneficiary Bank Address: 1111 Polaris Parkway, Columbus, OH 43240, USA

Amount: 5,000.00 USD  
Payment Reference: pmnt invoice 71387.8 dated 18.05.2021