

Exhibit E_Declaration of Steven Hansen

**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 STEVEN HANSEN

I, STEVEN HANSEN, 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 Gilbert, Arizona.
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. Through Google searches, I first learned about RoFx in late December 2018. I remember reading the following representations about the platform:
 - 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.”
5. Relying on these representations, I registered for a RoFx.net account in 2019. Then, between 2019 and 2021, I contributed \$950,000 to fund my RoFx.net account. 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 via my company, Colton Capital Partners.

Each beneficiary and my total contribution is identified below:

Beneficiary	Total Dollars Contributed
Notus LLC	\$450,000.00
Shopostar LLC	\$500,000.00
Total:	\$950,000.00¹

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

7. None of the money that I transferred to these beneficiaries has been returned; therefore, the total sum of my damages is \$950,000.00, 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: Glenwood Utah (City, State)

DocuSigned by:

Steven Hansen

D26080A74BCE451...

Steven Hansen

Plaintiff

¹ The total amount of my loss with respect to the Motion Defendants is \$950,000.00; however, my total contributions to RoFx.net was \$1,325,000.00 (including \$375,000.000 to Aware Choice Limited).

Hansen_Exhibit 1

4/17/2019

Invoice Number: 40296.3

Service For:
Colton Capital Partners LLC

Invoice Number: 40296.3
Date: 18 April 2019
Amount: 125000.00 USD

Payment Reference (SHOULD BE OBLIGATORY INDICATED)

pmnt invoice 40296.3 dated 18.04.2019

The information below should be obligatory included in your bank transfer details. Failure to provide the correct bank account information and payment reference will cause a rejection of the transaction by the receiving bank or a processing delay, as the bank will not be able to identify your payment.

Beneficiary Account Name: Aware Choice Limited
Beneficiary Address: 85 Great Portland Street, London, United Kingdom, W1W 7LT
Account Number (IBAN): [REDACTED] 3473

Beneficiary Bank: mBank SA
SWIFT: BREXPLPW
Beneficiary Bank Address: 18 Senatorska Street, Warszawa, Poland, 00-950

Amount: 125000.00 USD

Payment Reference: pmnt invoice 40296.3 dated 18.04.2019
(SHOULD BE OBLIGATORY INDICATED)

5/5/2019

Invoice Number: 40296.4

Service For:
Colton Capital Partners LLC

Invoice Number: 40296.4
Date: 6 May 2019
Amount: 150000.00 USD

Payment Reference (SHOULD BE OBLIGATORY INDICATED)

pmnt invoice 40296.4 dated 06.05.2019

The information below should be obligatory included in your bank transfer details. Failure to provide the correct bank account information and payment reference will cause a rejection of the transaction by the receiving bank or a processing delay, as the bank will not be able to identify your payment.

Beneficiary Account Name: Aware Choice Limited
Beneficiary Address: 85 Great Portland Street, London, United Kingdom, W1W 7LT
Account Number (IBAN): [REDACTED] 3473

Beneficiary Bank: mBank SA
SWIFT: BREXPLPW
Beneficiary Bank Address: 18 Senatorska Street, Warszawa, Poland, 00-950

Amount: 150000.00 USD

Payment Reference: pmnt invoice 40296.4 dated 06.05.2019
(SHOULD BE OBLIGATORY INDICATED)



Consumer International Wire Transfer Combined Disclosure and Receipt

JPMorgan Chase Bank, N.A.
Superstition Springs
1750 S Power Rd
Mesa, AZ 85206-4306

Today's Date: May 06, 2019
Wire Transfer Date: May 07, 2019

Date Funds Available to Recipient: May 14, 2019
Chase Wire Tracking Number: JVCXCUHM00AI

SENDER:

STEVEN J HANSEN

[REDACTED]
GILBERT, AZ [REDACTED]

RECIPIENT:

AWARE CHOICE LIMITED
85 GREAT PORTLAND STREET
LONDON, POL W1W7LT

[REDACTED] 8473

RECIPIENT BANK:

MBANK S.A. (FORMERLY BRE BANK S.A.)
CYBERNETYKI 7A,
WARSZAWA, POL

BREXPLPWCUJ

Exchange Rate: \$1 USD = 1 USD

Amount to be Deducted from Your Account:

Transfer Amount:	\$150,000.00
Transfer Fees:	+\$0.00
Transfer Taxes:	+\$0.00
Total:	\$150,000.00

Amount to be Received by the Recipient:

Transfer Amount:	150,000.00	USD
Other Fees:*	-0.00	USD
Total to Recipient	150,000.00	USD

*charged by other institutions

The recipient may receive less due to fees charged by the recipient's bank and foreign taxes.

If you provided us an incorrect account number for the Recipient or an incorrect routing or identification number for the Recipient's bank, you could lose the amount of the transfer.

You have a right to dispute errors in your transaction. If you think there is an error, contact us within 180 days at 1-888-434-3030 or send an account inquiry via Secure Message Center on chase.com. You can also contact us for a written explanation of your rights.

You can cancel this wire transfer at no cost within 30 minutes after you have authorized us to send this wire transfer. Please contact 1-800-935-9935 or visit a Chase branch.

If you have question or complaints about JPMorgan Chase Bank, N.A. contact:

Consumer Financial Protection Bureau
1-855-411-2372
1-855-729-2372 (TTY/TDD)
www.consumerfinance.gov



6/26/2019

Invoice Number: 40296.5

Service For:
Colton Capital Partners LLC

Invoice Number: 40296.5
Date: 27 June 2019
Amount: 100000.00 USD

Payment Reference (SHOULD BE OBLIGATORY INDICATED)

pmnt invoice 40296.5 dated 27.06.2019

The information below should be obligatory included in your bank transfer details. Failure to provide the correct bank account information and payment reference will cause a rejection of the transaction by the receiving bank or a processing delay, as the bank will not be able to identify your payment.

Beneficiary Account Name: Aware Choice Limited
Beneficiary Address: 85 Great Portland Street, London, United Kingdom, W1W 7LT
Account Number (IBAN): [REDACTED] 3473

Beneficiary Bank: mBank SA
SWIFT: BREXPLPW
Beneficiary Bank Address: 18 Senatorska Street, Warszawa, Poland, 00-950

Amount: 100000.00 USD

Payment Reference: pmnt invoice 40296.5 dated 27.06.2019
(SHOULD BE OBLIGATORY INDICATED)

Wire Transfer Outgoing Request

CHASE 

Wire Transfer Sender Information

Sender Name: STEVEN J HANSEN				
Account Name: COLTON CAPITAL PARTNERS, LLC			Street Address: [REDACTED]	
City: GILBERT	State: AZ	Zip: 85234-7476	Country: USA	Daytime Phone: [REDACTED]
Primary ID Type: Driver's License	ID Issuer: AZ	ID Number: [REDACTED] 2315	ID Issue Date: 10/24/2016	ID Exp: 11/29/2024
Secondary ID Type: Chase or Bank Issued Credit/Debit Card	ID Issuer: chase	ID Number: XXXXXXXXXXXX7810	ID Issue Date:	ID Exp: 01/31/2022
Comments:				

Wire Transfer Information

Request Date: 06/27/2019	Request time: 06:12:29PM Eastern time	Effective date: 06/28/2019	Wire Type: International
Debit Account #: [REDACTED] 200	Debit Account Type: TOTAL BUS CHK	Available balance: \$102,815.00	Wire Amount (US dollars): \$100,000.00
Qualifying Account #:	Qualifying Account Type:	Source of funds: Checking	Wire Fee: \$50.00
Currency type to be sent: US Dollars	Exchange rate: N/A	Foreign currency amount: N/A	Amount to Collect (USD): \$100,050.00
FX Contract Number:			

Recipient Account Information

Account Name: Aware Choice Limited				
Street Address: 85 Great Portland Street			Account Number: [REDACTED] 3473	
City: London	State:	Zip: w1w7lt	Country: GB	
Text to Recipient: pmnt invoice 40296.5 dated 27.06.2019				

Receiving Bank Information

Bank Name: mBank SA				
Street Address: ul. Senatorska 18			Bank ABA/SWIFT Code: BREXPLPWXXX	
City: Warsaw	State:	Zip: 00-950	Country: PL	
Intermediary Bank Name:				
Street Address:			Intermediary Bank ABA:	
City:	State:	Zip:	Country:	
Text to Receiving Bank:				



Service For:
Colton Capital Partners LLC

Invoice Number: 40296.6
Date: 2 January 2020
Amount: 225000.00 USD

Payment Reference

pmnt invoice 40296.6 dated 02.01.2020

Enter the following bank details accurately prior to making a transfer. Failure to provide the correct bank account information and payment reference will cause a rejection of the transaction by the receiving bank or a processing delay, as the bank will not be able to identify your payment.

Beneficiary Account Name: Notus LLC
Beneficiary Address: 3801 East Florida Avenue, Suite 400, Denver, CO 80210-2543, USA
Account Number: [REDACTED]1612
Routing Number: [REDACTED]9593

Beneficiary Bank: Bank of America
SWIFT: BOFAUS3N
Beneficiary Bank Address: P.O. BOX 27025, Richmond, VA, 23261-7025, USA

Amount: 225000.00 USD

Payment Reference: pmnt invoice 40296.6 dated 02.01.2020
(DO NOT enter any other details)

Wire Transfer Outgoing Request



Wire Transfer Sender Information

Sender Name: STEVEN J HANSEN				
Account Name: COLTON CAPITAL PARTNERS, LLC			Street Address: [REDACTED]	
City: GILBERT	State: AZ	Zip: 85234-2231	Country: USA	Daytime Phone: [REDACTED]
Primary ID Type: Driver's License	ID Issuer: AZ	ID Number: [REDACTED] 2315	ID Issue Date: 10/24/2016	ID Exp: 11/29/2024
Secondary ID Type: Chase or Bank Issued Credit/Debit Card	ID Issuer: Chase	ID Number: XXXXXXXXXXXX7810	ID Issue Date:	ID Exp: 01/31/2022
Comments:				

Wire Transfer Information

Request Date: 01/02/2020	Request time: 11:21:44AM Eastern time	Effective date: 01/02/2020	Wire Type: Domestic
Debit Account #: XXXXX6200	Debit Account Type: TOTAL BUS CHK	Wire Amount (US dollars): \$225,000.00	
Qualifying Account #:	Qualifying Account Type:	Source of funds: Checking	Wire Fee: \$35.00
Currency type to be sent: US Dollars	Exchange rate: N/A	Foreign currency amount: N/A	Amount to Collect (USD): \$225,035.00
FX Contract Number:			

Recipient Account Information

Account Name: Notus, LLC			
Street Address: 3801 East Florida Avenue Ste 400		Account Number: [REDACTED] 612	
City: Denver	State: CO	Zip: 80210-2543	Country: USA
Text to Recipient: Please reference invoice 40296.6 dated 02.01.2020			

Receiving Bank Information

Bank Name: Bank of America, National Association			
Street Address: 100 N TRYON ST, STE 170		Bank ABA/SWIFT Code: [REDACTED] 593	
City: CHARLOTTE	State: NC	Zip: 28202	Country: USA
Intermediary Bank Name:			
Street Address:		Intermediary Bank ABA:	
City:	State:	Zip:	Country:
Text to Receiving Bank:			

Service For:
Colton Capital Partners LLC

Invoice Number: 40296.7
Date: 20 May 2020
Amount: 225000.00 USD

Payment Reference

pmnt invoice 40296.7 dated 20.05.2020

Enter the following bank details accurately prior to making a transfer. Failure to provide the correct bank account information and payment reference will cause a rejection of the transaction by the receiving bank or a processing delay, as the bank will not be able to identify your payment.

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

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

Amount: 225000.00 USD

Payment Reference: pmnt invoice 40296.7 dated 20.05.2020
(DO NOT enter any other details)

Wire Transfer Outgoing Request



Wire Transfer Sender Information

Sender Name: STEVEN J HANSEN				
Account Name: STEVEN J HANSEN			Street Address: [REDACTED]	
City: GILBERT	State: AZ	Zip: 85234-2231	Country: USA	Daytime Phone: [REDACTED]
Primary ID Type: Driver's License	ID Issuer: AZ	ID Number: [REDACTED] 315	ID Issue Date: 01/22/2020	ID Exp: 01/22/2025
Secondary ID Type: Chase or Bank Issued Credit/Debit Card	ID Issuer: Chase	ID Number: XXXXXXXXXXXX7810	ID Issue Date:	ID Exp: 01/30/2022
Comments:				

Wire Transfer Information

Request Date: 05/21/2020	Request time: 03:03:23PM Eastern time	Effective date: 05/21/2020	Wire Type: Domestic
Debit Account #: XXXXX5923	Debit Account Type: CPC CHECKING	Wire Amount (US dollars): \$225,000.00	
Qualifying Account #:	Qualifying Account Type:	Source of funds: Checking	Wire Fee: \$0
Currency type to be sent: US Dollars	Exchange rate: N/A	Foreign currency amount: N/A	Amount to Collect (USD): \$225,000.00
FX Contract Number:			

Recipient Account Information

Account Name: Notus LLC				
Street Address: 102 Country Club Dr			Account Number: [REDACTED] 2270	
City: Grand Island	State: NY	Zip: 14072	Country: USA	
Text to Recipient: Pmnt Invoice 40296.7 dated 20.05.2020				

Receiving Bank Information

Bank Name: KeyBank National Association				
Street Address: 105 PARK ST			Bank ABA/SWIFT Code: [REDACTED] 077	
City: ALTAMONT	State: NY	Zip: 12009	Country: USA	
Intermediary Bank Name:				
Street Address:			Intermediary Bank ABA:	
City:	State:	Zip:	Country:	
Text to Receiving Bank:				

Service For:
Colton Capital Partners LLC

Invoice Number: 40296.8
Date: 28 October 2020
Amount: 250000.00 USD

Payment Reference

pmnt invoice 40296.8 dated 28.10.2020

Enter the following bank details accurately prior to making a transfer. Failure to provide the correct bank account information and payment reference will cause a rejection of the transaction by the receiving bank or a processing delay, as the bank will not be able to identify your payment.

Beneficiary Account Name: Shopostar, LLC
Beneficiary Address: 7887 E BELLEVIEW AVE, STE 1100, ENGLEWOOD, 80111-6097, Colorado, United States
Account Number: [REDACTED] 1507
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: 250000.00 USD

Payment Reference: pmnt invoice 40296.8 dated 28.10.2020
(DO NOT enter any other details)



Wire Transfer Outgoing Request

Wire Transfer Sender Information

Sender Name: STEVEN J HANSEN				
Account Name: COLTON CAPITAL PARTNERS, LLC			Street Address: [REDACTED]	
City: GILBERT	State: AZ	Zip: 85234-2231	Country: USA	Daytime Phone: [REDACTED]
Primary ID Type: Driver's License	ID Issuer: AZ	ID Number: [REDACTED] 2315	ID Issue Date: 01/22/2020	ID Exp: 01/22/2025
Secondary ID Type: Chase or Bank Issued Credit/Debit Card	ID Issuer: Chase	ID Number: XXXXXXXXXXXX7810	ID Issue Date:	ID Exp: 01/31/2022
Comments:				

Wire Transfer Information

Request Date: 10/28/2020	Request time: 06:53:49PM Eastern time	Effective date: 10/29/2020	Wire Type: Domestic
Debit Account #: XXXXX6200	Debit Account Type: TOTAL BUS CHK	Wire Amount (US dollars): \$250,000.00	
Qualifying Account #:	Qualifying Account Type:	Source of funds: Checking	Wire Fee: \$35.00
Currency type to be sent: US Dollars	Exchange rate: N/A	Foreign currency amount: N/A	Amount to Collect (USD): \$250,035.00
FX Contract Number:			

Recipient Account Information

Account Name: Shopostar, LLC				
Street Address:		Account Number: [REDACTED] 1507		
City:	State:	Zip:	Country:	
Text to Recipient: Payment Reference: pmnt invoice 40296.8 dated 28.10.2020				

Receiving Bank Information

Bank Name: Bank of America, National Association				
Street Address: 100 N Tryon St, Ste 170		Bank ABA/SWIFT Code: [REDACTED] 9593		
City: Charlotte	State: NC	Zip: 28202	Country: USA	
Intermediary Bank Name:				
Street Address:		Intermediary Bank ABA:		
City:	State:	Zip:	Country:	
Text to Receiving Bank:				

1/4/2021

Service For:
Colton Capital Partners LLC

Invoice Number: 40296.10
Date: 4 January 2021
Amount: 250000.00 USD

Payment Reference

pmnt invoice 40296.10 dated 04.01.2021

Enter the following bank details accurately prior to making a transfer. Failure to provide the correct bank account information and payment reference will cause a rejection of the transaction by the receiving bank or a processing delay, as the bank will not be able to identify your payment.

Beneficiary Account Name: Shopostar, LLC
Beneficiary Address: 7887 E BELLEVIEW AVE, STE 1100, ENGLEWOOD, 80111-6097, Colorado, United States
Account Number: [REDACTED] 1507
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: 250000.00 USD

Payment Reference: pmnt invoice 40296.10 dated 04.01.2021
(DO NOT enter any other details)

Wire Transfer Outgoing Request



Wire Transfer Sender Information

Sender Name: STEVEN J HANSEN				
Account Name: COLTON CAPITAL PARTNERS, LLC			Street Address: [REDACTED]	
City: GILBERT	State: AZ	Zip: 85234-2231	Country: USA	Daytime Phone: [REDACTED]
Primary ID Type: Driver's License	ID Issuer: AZ	ID Number: [REDACTED] 2315	ID Issue Date: 01/22/2020	ID Exp: 01/22/2025
Secondary ID Type: Chase or Bank Issued Credit/Debit Card	ID Issuer: Chase	ID Number: XXXXXXXXXXXX7810	ID Issue Date:	ID Exp: 01/30/2022
Comments:				

Wire Transfer Information

Request Date: 01/04/2021	Request time: 11:17:56AM Eastern time	Effective date: 01/04/2021	Wire Type: Domestic
Debit Account #: XXXXX6200	Debit Account Type: TOTAL BUS CHK	Wire Amount (US dollars): \$250,000.00	
Qualifying Account #:	Qualifying Account Type:	Source of funds: Checking	Wire Fee: \$35.00
Currency type to be sent: US Dollars	Exchange rate: N/A	Foreign currency amount: N/A	Amount to Collect (USD): \$250,035.00
FX Contract Number:			

Recipient Account Information

Account Name: Shopostar, LLC			
Street Address: 7887 E Belleview AVE STE 1100		Account Number: [REDACTED] 507	
City: Englewood	State: CO	Zip: 80111	Country: USA
Text to Recipient: pmnt invoice 40296.10 dated 04.01.2021			

Receiving Bank Information

Bank Name: Bank of America, National Association			
Street Address: 100 N Tryon St, Ste 170		Bank ABA/SWIFT Code: [REDACTED] 9593	
City: Charlotte	State: NC	Zip: 28202	Country: USA
Intermediary Bank Name:			
Street Address:		Intermediary Bank ABA:	
City:	State:	Zip:	Country:
Text to Receiving Bank:			