

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PROMIER PRODUCTS INC.,

Plaintiff,

v.

GEAROSZ, *et al.*,

Defendants.

Case No. 25-cv-497

(Judge Colville)

FILED UNDER SEAL

SECOND DECLARATION OF DEE ODELL

I, Dee Odell, hereby declare and state as follows:

1. I am over eighteen (18) years of age. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to testify to the matters stated herein. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. In making this declaration, I represent the collective effort for Ference & Associates, including myself, who conducted an investigation to determine if the identified Defendants were and/or are currently offering for sale and/or selling falsely advertised products and whether each of the identified Defendants will ship and/or has actually shipped such products to the United States, including customers specifically located in Pennsylvania.

3. I make this second declaration in support of Plaintiff's *Ex Parte* Application for Entry of a Temporary Restraining Order and Preliminary Injunction against Defendants, the Individuals, Partnerships, and Unincorporated Associations identified on **Schedule "A"** to the Complaint.

4. My original declaration in the matter establishes that each defendant accepted an order from a Pennsylvania resident and shipped its product into Pennsylvania, collecting Pennsylvania tax on the purchase.

5. Additionally, in connection with each purchase, three emails were sent into Pennsylvania: an email confirming the placement of the order; an email confirming the shipment of the order to the Pennsylvania address; and an email confirming the delivery of the order to the Pennsylvania address.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 2, 2025

/s/ Dee Odell
Dee Odell