

Exhibit 4

The Brooksby Defendants

1. Upon information and belief Defendant Craig Orson Brooksby (“Brooksby”) is a citizen and resident of Wake County, North Carolina.
2. Brooksby, either individually or through other entities, owns or controls many of the entities that are part of the Estates Cartel.
3. Upon information and belief Avirta, LLC (“Avirta”) is a Utah limited liability company. King Family Enterprises, LLC is the sole member of Avirta.
4. Upon information and belief, Avirta is an “asset protection LLC” through which Brooksby owns several of the components of the Estates Cartel.
5. King Family Enterprises, LLC, in turn, is a Utah limited liability company
6. The GG Irrevocable Trust is, upon information and belief, a North Carolina irrevocable trust.
7. Upon information and belief, Brooksby and his wife are beneficiaries of the GG Irrevocable Trust.