

Exhibit A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARK W. DOBRONSKI,

Plaintiff,

v.

Case No. 5:25-cv-10168

Hon. Judith E. Levy

Mag. Elizabeth A. Stafford

ADVISORWORLD.COM,
INC., *et al.*,

SECOND DECLARATION OF GALEN WESTON

I, Galen Weston, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over eighteen years of age and providing this declaration as the Chief Executive Officer of Advisorworld.com, Inc (“Advisorworld”).
2. I have personal knowledge of all facts included herein.
3. Based upon our IP address logging program, as discussed in my first declaration, dated August 7, 2025, ECF 21-1, we have been able to identify further attempts to bait Advisorworld into contacting Mark Dobronski under an additional alias: On January 27, 2025 at 10:38 AM, an inquiry was created for “Charles A. Meraman” at email address cameraman5555@yahoo.com, through our “Contact Us” webpage, posing as an investment advisor seeking to learn more about our platform. **Exhibit 1, Lead Email.**

4. However, the Gmail server indicated that the email account belonged to a “Tyler Tarrant.” *Id.*

5. As the email chain shows, we attempted to contact this person, and they followed up with a tersely written do-not-call demand and request for our written do-not-call policies, which we promptly provided.

6. Based on the repeated, very similar inquiry forms from the same IP address that created the inquiry for “Stanley Norris” and Dobronski’s admission in the Complaint that he used that alias while on the phone with us, I believe Dobronski submitted these other inquiries in an attempt to entrap Advisorworld.com into violations of the Telephone Consumer Protection Act and related state statutes.

7. Advisorworld has now initiated a lawsuit against Dobronski in Ontario, Canada, alleging fraudulent inducement and entrapment among other things. The case is Filed at No. CV-25-00751124-0000.

I certify, under penalty of perjury under the laws of the United State of America, that the foregoing is true and correct.

Executed this 16th day of September, 2025.

By: Galen Weston

/s/  _____