

EXHIBIT 4

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

_____)	
In the Matter of:)	
)	
Stephen Pearson d/b/a)	
Pearson Custom Homes)	Docket No.
30 Wayside Avenue)	TSCA-01-2018-0015
Byfield, MA 01922)	
)	
Respondent.)	
)	
Proceeding under Section 16(a) of the)	
Toxic Substances Control Act,)	
15 U.S.C. § 2615(a))	
_____)	

AFFIDAVIT

I, Mary Medeiros, do depose and say as follows:

1. I am a certified public accountant and work as a Financial Analyst for the United States Environmental Protection Agency – Region 1.

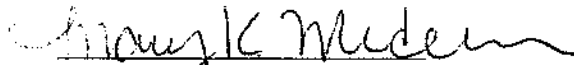
2. Among other duties, in my capacity as a Financial Analyst I complete evaluations of the ability of a person, corporation or other entity to pay a penalty assessed in an EPA administrative penalty action under EPA’s Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. Part 22, in accordance with various EPA guidance.

3. In the above-referenced matter, I lent my support to review documents retrieved from EPA’s search of Stephen Pearson d/b/a Pearson Custom Homes on the websites of Nexis/Lexis and the Southern Essex Registry of Deeds, Massachusetts, full copies of which are attached as

Exhibits 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), and 3(g) to EPA's Memorandum in Support of Motion for Default Order.

4. Based on my review, nothing in the information found on the websites indicates that Respondent does not have the ability to pay the assessed penalty of \$4,667.

Signed this 12 day of March, 2019.



Mary K. Medeiros, C.P.A.
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