

STATE OF MICHIGAN
IN THE 1ST JUDICIAL CIRCUIT COURT FOR THE COUNTY OF HILLSDALE

DANA NESSEL, ATTORNEY GENERAL
OF THE STATE OF MICHIGAN,

Petitioner,

No. 19- -CZ

v

HON.

PAUL STEURY AND PETER MILLER

Respondents.

Ashlee N. Lynn (P78789)
Darrin F. Fowler (P53464)
Assistant Attorneys General
Michigan Dep't of Attorney General
Corporate Oversight Division
P.O. Box 30736
Lansing, MI 48909
(517) 335-7632
Lynna@michigan.gov
FowlerD1@michigan.gov

**ATTORNEY GENERAL'S *EX PARTE* PETITION FOR CIVIL
INVESTIGATIVE SUBPOENAS**

Introduction

Animals do not have a voice and so we must speak for them. When consumers purchase puppies and dogs from a puppy mill or a pet store, they are not always told exactly where the animal came from, the real health of the animal, and the conditions of which it lived in previously. Some unscrupulous sellers lie about these things so they can make a quick buck.

When purchasing a dog or puppy, you are acquiring a new member of the family, it is not simply a product that you are buying off of the shelf. Unfortunately,

not all consumers know what signs to look for when they are purchasing an animal to determine if it came from an illegal puppy mill or a reputable breeder, and Respondents rely on that fact. According to complaints that the Attorney General received, Respondents, Paul Steury (Steury) and Peter Miller (Miller), have been selling puppies and dogs to consumers, under the assertion that these animals are healthy and have been examined by a veterinarian. Respondents sell these dogs for over \$200.00 each, knowing that some if not most of the consumers, will have to pay high veterinary fees due to the health conditions of these animals. Additionally, Respondents indicate that the animals have been certified as a certain breed, which is not always the case. Thus, the Attorney General seeks this Court's authorization to proceed with an investigation under the Michigan Consumer Protection Act (MCPA), MCL 445.901 *et seq.*

Parties, Legal Authority, and Venue

1. The Michigan Attorney General is authorized to file an *ex parte* petition with the Circuit Court requesting issuance of investigative subpoenas pursuant to Section 7 of the MCPA, MCL 445.907, which provides in pertinent part:

(1) Upon the *ex parte* application of the attorney general to the circuit court in the county where the defendant is established or conducts business or, if the defendant is not established in this state, in Ingham county, the circuit court, if it finds probable cause to believe a person has engaged, is engaging, or is about to engage in a method, act, or practice which is unlawful under this act, may, after *ex parte* hearing, issue a subpoena compelling a person to appear before the attorney general and answer under oath questions relating to an alleged violation of this act....The subpoena may compel a person to produce the books, records, papers, documents, or things relating to a violation of this act. MCL 445.907(1).

2. For purposes of this investigation, the Respondents are Paul Steury (Steury) and Peter Miller (Miller). Steury owns the property where the dogs are bred and housed, and he is directly involved with the selling of the animals. Miller is Steury's driver and assumed business partner.

3. Respondents have their principal place of business in Hillsdale County, located at 5900 West Burt Road, Camden, MI, 49232. This puppy mill, however, is not a registered business in the state of Michigan. Thus, this Court is an appropriate venue in which to file this Petition.

4. As elaborated below, the Attorney General has probable cause to believe that the Respondents have engaged in patterns of misconduct constituting violations of multiple provisions of the MCPA. In numerous instances, evidence suggests the Respondents sold dogs that were sick; provided falsified documentation regarding breed, age, health, and vaccination history; and also sold dogs to pet stores, while not being licensed to do so. It is unknown as to how widespread these practices have been and how many consumers have been affected. The Respondents are not only tricking consumers into purchasing the animals, but possibly leaving consumers stuck paying hundreds or thousands of dollars in veterinary bills due to the hidden medical issues the animals may face. Further, there is probable cause to believe that the Respondents have engaged in a widespread pattern of selling sick and injured animals to consumers knowing full well that the animal was sick.

Factual Background

5. In 2019, the Attorney General's office received three (3) complaints from consumers through the Humane Society of the United States and we received one (1) complaint that was filed with the Monroe County Sheriff's Office by employees of the Monroe Society for the Prevention of Cruelty to Animals. (SPCA).

6. Due to the troubling nature of the allegations, the Attorney General began informally gathering information about Respondents.

7. An affidavit was obtained from Katrina Stillwagon, the president of the Monroe SPCA. (See Katrina Stillwagon's Affidavit, attached as **Exhibit 1**).

8. On February 15, 2019, Katrina and her co-worker were approached by the Respondents in the parking lot of the Monroe SPCA Adoption Center and Retail Store located at 293 W. Monroe Street, Dundee, MI 48131.

9. Respondents were selling five (5) puppies out of the back of Miller's vehicle. The puppies were being held in a filthy, rabbit-style cage and smelled of feces and urine. One puppy in particular seemed to have some neurological issues, however Steury told Katrina that one was not for sale.

10. Katrina set up a time to meet the Respondents the next day to purchase the five (5) puppies, for \$275.00 each. Katrina bought all five (5) puppies and took them to the Allegan Veterinary Clinic. All five (5) puppies tested positive for Giardia and other health issues. (See **Exhibit 1A**).

11. The Respondents provided individual health records for each puppy. As the veterinarian at the Allegan Veterinary Clinic examined each puppy, she

found that the health records were most likely false and that these puppies were not healthy, and possibly had not been vaccinated, as the health records had indicated. **(See Exhibit 1B).**

12. In March, Steury contacted Katrina regarding the sale of seven (7) Newfoundland and Poodle mix puppies. On March 22, 2019 Katrina met with the Respondents at the Monroe SPCA Adoption Center and Retail Store and purchased all seven (7) puppies for \$2,000.00. The puppies were again in small, filthy, wire cages and smelled of urine and feces. Respondents gave Katrina documents saying they were the health records for each puppy. **(See Exhibit 1C).**

13. All seven (7) puppies were taken to the Monroe Veterinary Clinic and examined by Dr. Bhupinder Pelia. All seven (7) puppies tested positive for Giardia infections and were malnourished. **(See Exhibit 1D, 1E and 1F).** The veterinarian determined that these puppies were not healthy, and possibly had not been vaccinated, as the health records supplied by Respondents had indicated.

14. During the veterinarian examination of the seven (7) puppies Steury called Katrina regarding another puppy that was for sale. Katrina previously asked about this puppy during the last buy, as it was in the back of the van, but was told this puppy was being sold in Ypsilanti. Steury and Katrina met at the McDonalds in Dundee, Michigan that day and Katrina purchased the one (1) puppy. Steury said he had been using Cannabidiol 125 on this puppy's eyes. Steury did not provide any health records to Katrina regarding this puppy. A vision test was done on the puppy and the veterinarian determined that his eyes most likely had been

damaged due to a non-veterinary prescribed treatment, possibly the Cannabidiol
125. (See Exhibit 1G and 1H).

15. On April 11, 2019 Katrina planned to meet the Respondents at the Monroe SPCA Adoption Center and Retail Store to purchase (7) more puppies. However, the day before the meeting, Steury called Katrina and informed her that he only had three (3) puppies left, as he sold the other four (4) to someone else who offered more money. Katrina still met with the Respondents and while they used a different vehicle, the puppies were kept in the back in small, filthy cages, smelling like urine and feces. Steury gave Katrina documents he said were health records for the three (3) puppies. (See Exhibit 1I).

16. Katrina took the puppies to the Monroe Veterinary Clinic where they were examined by Dr. Bhupinder Pelia, who found that all three (3) puppies tested positive for Guardia. (See Exhibit 1J and 1K). The veterinarian determined that the Individual Health Records provided by Steury were likely false and that these puppies were not healthy, and possibly had not been vaccinated, as the health records had indicated.

17. On July 18, 2019 Steury invited Katrina to his property to purchase some dogs and puppies. While on the premises she observed more than one hundred (100) dogs, most in dire conditions. The animals were confined to four different areas. Moreover, the two outdoor pens did not have any protection from the elements and the dogs, some of which were pregnant, were heavily panting and in rough condition, as the temperature that day was nearing ninety (90) degrees.

The two indoor areas smelled like urine, feces and vomit, and were extremely hot. The animals did not look healthy and Katrina thought that one of the puppies may have been dead.

18. Steury told Katrina that his two sons lived nearby and housed more of his animals. Katrina bought sixteen (16) dogs from Steury that day. Miller was not present during this transaction.

19. The Michigan Humane Society took five (5) of the dogs and Katrina took the remaining eleven (11) to the Monroe Veterinary Clinic. Dr. Bhupinder Pelia examined the dogs and found that many of them tested positive for Giardia, Coccidia, and other health problems. **(See Exhibit 1L)**. It is Dr. Pelia's professional opinion that "the puppies were not kept in healthy or sanitary conditions." **(See Exhibit 1M)**. Katrina did not initially receive any individual health records for these dogs. However, after Katrina requested them from Steury, Miller dropped off fifteen (15) individual health records to Katrina at the Monroe SPCA. Each record included a specific schedule for different vaccinations, but no name or breed were listed, meaning that these health records were not for any specific dog. **(See Exhibit 1N)**.

20. Respondents contacted Katrina over a dozen times on September 23, 2019 and Steury told her that a deputy from the Hillsdale County Sheriff's Office came out to his property a week prior and instructed him to get rid of some of his dogs. Steury pleaded with Katrina to take eighteen (18) dogs and told her not to

worry about payment at this time. Steury then told her that any dogs he couldn't get rid of by the end of the next day he would move to his son-in-law's property.

21. Steury indicated to Katrina that they were selling these dogs to pet stores in the general area. Katrina specifically went to one of the pet stores and saw a puppy that she knew the Respondents previously had in their possession.

22. There is probable cause to believe the Respondents are violating the MCPA. As explained in this Petition, the Attorney General has probable cause to believe Respondents have engaged in the following unfair and deceptive trade practices that are prohibited under the MCPA:

(e) Representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another.

(s) Failing to reveal a material fact, the omission of which tends to mislead or deceive the consumer, and which fact could not reasonably be known by the consumer.

(bb) Making a representation of fact or statement of fact material to the transaction such that a person reasonably believes the represented or suggested state of affairs to be other than it actually is.

(cc) Failing to reveal facts that are material to the transaction in light of representations of fact made in a positive manner.

[MCL 445.903(1)].

23. Steury and Miller are selling sick animals to consumers while holding them out to be healthy animals that have been cleared by a veterinarian.

24. Neither Steury nor Miller are licensed through the United States Department of Agriculture to sell animals to pet stores, however upon information and belief they are selling dogs and puppies to many pet stores in the area.

25. From the consumers' perspective, the amount of money involved here may not be large at first, but the veterinary bills that they might incur due to the unfair and deceptive actions of the Respondents could be quite large. It is unknown at this time how many potential consumers might have been affected.

Conclusion and Relief Sought

The Attorney General's goal is to develop a sufficient enough understanding to commence a lawsuit expeditiously that includes all necessary and appropriate defendants, and the assertion of well-developed claims leading to prompt relief for affected consumers. Based on the above, the Attorney General seeks a subpoena compelling Respondents to provide (1) a list of all consumers that they have sold animals to within the past year, (2) copies of any vaccination, health, and veterinarian records that the Respondents have provided to consumers, (3) a list of stores that to which Respondents have sold dogs or puppies, and (4) an order authorizing an inspection at Steury's property of all puppies and dogs by a veterinarian from the Humane Society of Michigan who will be assisting the Attorney General in this investigation..

The Attorney General also seeks investigative testimony from both Respondents, to gain more information about their business practices.

Finally, the Attorney General asks for the authority to issue further subpoenas as warranted based on the evidence obtained during the course of the investigation.

Respectfully submitted,

DANA NESSEL
Attorney General



Ashlee N. Lynn (P78789)
Darrin F. Fowler (P53464)
Assistant Attorneys General
Michigan Dep't of Attorney General
Corporate Oversight Division
P.O. Box 30736
Lansing, MI 48909
(517) 335-7632

Dated: September 24, 2019

E

X

H

I

B

I

T

1

AFFIDAVIT OF KATRINA STILLWAGON

Katrina Stillwagon being first duly sworn, deposes and says as follows:

1. I am a Michigan resident and I am the President of the Monroe Society for the Prevention of Cruelty to Animals (SPCA).

2. On February 15, 2019 Monroe SPCA Vice President Tammy Bennett and I were approached by Paul Steury (Steury) and Steven Miller (Miller) in the parking lot of the Monroe SPCA, located at 293 W. Monroe Street, Dundee, MI 48131.

3. Steury indicated to me that they had puppies for sale in the back of their van and wanted to know if I would be interested in purchasing the puppies.

4. Miller stayed in the vehicle and Steury exited the vehicle and showed me the six (6) puppies that were for sale in the back of the van.

5. All six (6) puppies were tightly huddled together in a small, filthy wire cage.

6. I could immediately smell urine, vomit and feces when Steury opened the door and I observed that the puppies were shaking.

7. One of the puppies, a Red Merle Aussie mix, seemed to be having motor/neurological problems. When asked about the puppy, Steury indicated he probably wouldn't sell that puppy.

8. I discussed prices with Steury and set up a time to meet for the following day to purchase the puppies. I then exchanged phone numbers with Steury through Miller.

9. On February 16, 2019 Miller arrived without Steury at the Monroe SPCA with five (5) puppies. I tried to negotiate a lower price, which Miller told me he could not accept on behalf of Steury. I then bought the five (5) puppies from Miller for \$1,250.00.

10. The President of Luvnpupz, Carri Shipaila arrived at Monroe SPCA to help me transport the five (5) puppies to the Allegan Veterinary Clinic. Veterinary records have been included as Attachment A. For identification purposes, this group of puppies were named the "Backstreet Boys".

11. All of the puppies tested positive for Giardia and a host of other issues.

12. I received individual health records for all five (5) puppies, included as Attachment B. The veterinarian could not verify that the puppies had actually been given the vaccinations that the health records indicated they had received and could not verify that the correct breed had been listed. The veterinarian did conclude that the ages of the puppies did not match the health records.

13. In March I was contacted by Steury regarding another potential sale of seven (7) puppies that were Newfoundland and Poodle mixes (Newfy-poo) that were 10-12 weeks of age. I negotiated a price for all seven (7) in the amount of \$2,000.00.

14. On Friday March 22, 2019 I met Steury and Miller at the Monroe SPCA to purchase the puppies. Carri Shipaila was also present, along with volunteer Rhonda Hannahs. The seven (7) puppies were in the back of the van,

again in filthy, wire cages, and also some plastic carriers. The cages/carriers were too small for the puppies; as they could not stand up or turn around easily, if at all.

15. I could immediately smell urine, feces and vomit when Steury opened the back door. The puppies were all huddled together, completely frozen and quiet. Steury ripped the puppies from the cages, injuring one in the process, and handed them to us. We brought them inside the Monroe SPCA to quarantine them. I paid \$2,000.00 for the seven (7) puppies. For identification purposes, these puppies are referred to as "The Millers".

16. I noticed that there were some other cages in the back of the vehicle, one with a young German Shepherd mix inside, with vomit dripping from his lips, visibly dirty and very still. The carrier was too small for this dog as I observed the dog hunched over, not being able to sit up straight. I later learned that there was also another puppy behind him in the small carrier. I offered to buy the German Shepherd mix puppy but was told by Miller, who stayed in the vehicle, that the three puppies in the van, (I could only see one), were already promised to someone in Ypsilanti. Steury then gave me the individual health records for all seven (7) puppies. The individual health records are included as Attachment C.

17. Steury closed the door of the vehicle and stated he had more puppies for sale and possibly some adult dogs as well. I tried to get as much information from him as possible regarding the breeds and health of the individual dogs. Steury tried to sell me a Red Stud Poodle for \$1,500.00 and as incentive he said he would

sell me a miniature Aussie for \$200.00. I said I was interested, and he said he would call me in a couple weeks.

18. All seven (7) puppies that I had just purchased were taken to the Monroe Veterinary Clinic and were examined by Dr. Bhupinder Pelia. All seven (7) puppies tested positive for Giardia infections and were malnourished. The initial veterinary records, updated veterinary records and a letter from the veterinarian are included as Attachments D, E and F. The veterinarian could not verify that the puppies had been given any vaccinations. The veterinarian did not review the individual health records for these puppies prior to examination.

19. During the veterinary exam of the seven (7) puppies I received a call from Steury asking if I was interested in buying an English Bulldog puppy that was previously being sold to someone in Ypsilanti. Steury said the sale fell through and he said that something was wrong with the dog's eyes. I told Steury that I would pay \$200.00 for the puppy and he agreed to the price. We met at the McDonald's in Dundee, Michigan and Steury yanked the puppy out of the filthy cage from the back of Miller's vehicle and held the puppy by her leg. The puppy was clearly in distress but Steury showed no emotion or reaction to the puppy's cries. I purchased the puppy and Steury continued to talk to me. He took a bottle out of his pocket that was labeled as Cannabidiol 125. Steury asked me if I planned on treating the puppy's eyes, and I said yes. Steury mentioned that he used the Cannabidiol 125 to treat this dog and it had helped. No health records were provided for this puppy, as Steury said he left them with someone else. I took the puppy to the Monroe

Veterinary Clinic. A vision test was done on the puppy and the veterinarian determined that her eyes most likely had been damaged due to a non-veterinary prescribed treatment, possibly the Cannabidiol 125. A letter from the veterinarian and the veterinary records are included as **Attachments G and H**.

20. Steury continued to call me offering other sales of different puppies and adult dogs. We scheduled a meeting for the sale of seven (7) puppies for April 11, 2019 at the Monroe SPCA. I negotiated a price for each of the puppies, however the day before the meeting Steury called me to tell me he only had three (3) puppies left, because he sold the other puppies to other individuals who were willing to pay a higher price. I met with Steury and Miller on April 11, 2019 at the Monroe SPCA and Steury began unloading the three (3) puppies. I placed them into a quarantine pen and then paid Steury. This time Miller was driving a different vehicle, specifically a Chevrolet pickup truck, however the back-seat area of the cab smelled of urine and feces and the cages where the puppies were being held were dirty. Steury gave me the health records for the three (3) puppies and then he told me about other dogs that he had available for purchase. The individual health records are included as **Attachment I**. I asked him to call me later about the other dogs and he left the premises. Shortly thereafter the puppies were taken to the Monroe Veterinary Clinic and were examined by Dr. Bhupinder Pelia, who found that the three (3) puppies were positive for Giardia infections. The veterinary records and a letter from the veterinarian are included as **Attachments J and K**. For identification purposes, these puppies are known as "The Noodles."

21. The veterinarian could not verify that the puppies had actually been given the vaccinations that the health records indicated they had received and could not verify that the correct breed had been listed. On July 18, 2019 Steury invited me and two others to his property to look at and potentially buy several adult breeding dogs, as well as some puppies. I went to his property and was there for approximately two (2) hours. During that time, I observed more than one hundred (100) dogs on the premises.

22. While on the property, I observed that there were four (4) different areas where Steury kept the dogs. There was a "puppy building" which contained several pens where adult dogs were being held while nursing their puppies. A few of the pens contained only puppies. The temperature that day was already nearing ninety (90) degrees. The heat in this building was stifling and there was little to no air circulation. The stench of urine and feces was almost too strong to stomach. It was difficult to breathe and there were flies everywhere. The adult dogs in this building were visibly panting, some heavily. All the dogs were dirty and caked with urine and/or fecal matter. Some of the dogs were so heavily matted that I could not discern what breed they were. I was able to come back to this building by myself an hour or so later and I went to each pen to check on the puppies. When I touched them, they were listless and warm to the touch. Some of the dogs were restrained in their pens, and therefore I was unable to touch them.

23. The "breeding building" was attached to the puppy building and housed primarily adult dogs in pens, but one pen had at least five (5) puppies, one of

which seemed to be deceased, as it was not moving. I asked Steury about the puppy and he told me that all of the puppies in that particular pen were being treated for an illness and would not allow me to purchase the puppies nor was I allowed to pick them up. It was extremely hot in this building, the flies still plagued us and the dogs, and I could still smell urine and feces. A couple of the dogs being kept in this building seemed visibly afraid of us and seemed extremely anxious and distressed. It was traumatizing for me to witness the conditions of these dogs, as well as the manner in which they were being handled. I have been doing this work for more than twenty (20) years and this day still haunts me. One dog in particular had recently been shaved, however not with trimmers but rather it appeared it was done by hand with some kind of shears and he was extremely scared of us.

24. The next area was a fenced in outdoor yard that contained four (4) large young dogs. Steury said the dogs were Newfy-pooos, approximately five (5) months old, and he was willing to sell us only one of them, as the others would be used for breeding soon. This outdoor area had no shelter for protection from the elements and had no water or food.

25. The last area was another fenced in outdoor yard that had more than six (6) large dogs, said by Steury to be purebred adult females, and four (4) of them were confirmed pregnant. This outdoor area also had no protection from the elements and no food or water. There were large, deep holes in the dirt in this area, presumably dug by the dogs, in which the dogs were laying. The dogs were all heavily panting and visibly distressed. One of the adult dogs had fresh wounds on

her face and muzzle, which appeared to be lacerations from some object rather than another dog. I indicated I was interested in purchasing this dog, however, Steury did not want to sell her as she was pregnant. Steury then indicated he was not willing to sell any of the pregnant dogs.

26. Steury told me that his two sons had more dogs on their properties, one of which is located right next door to Steury and from the road you can see buildings similar to the ones on Steury's property, with large kennels.

27. I bought sixteen (16) dogs from Steury that day.

28. To note—when I arrived at Steury's home that day I observed a pony standing by the entrance, harnessed to a cart and secured to a hitching post. When I was leaving approximately two hours later, I saw that the pony was still in the exact same spot, and I did not see any food or water that the pony might have had access to and there was also no protection from the elements.

29. We transported the dogs to the Monroe Veterinary Clinic. The Michigan Human Society took possession of four (4) adult dogs and one (1) puppy. Dr. Bhupinder Pelia examined the eleven (11) remaining dogs and found that many tested positive for Giardia, Coccidia, and other health problems. The veterinary records and a letter from the veterinarian are included at Attachments L and M.

30. At that time I did not receive any individual health records from Steury for these dogs. However, I reached out to Steury and told him I needed the health records and on September 21, 2019 Miller dropped off fifteen (15) individual health records in the Monroe SPCA mailbox. Each individual health record

indicates a specific schedule for different vaccinations, however, there is no dog listed for any of the records. The individual health records are included as Attachment N. Therefore, I was given documentation of vaccinations for fifteen (15) dogs, however they were not specific to any dog. This furthers my belief that Steury is not vaccinating the dogs and is fabricating health records.

31. Steury and Miller called me over a dozen times on September 23, 2019. When I finally answered the phone Steury told me that he was desperately trying to move most of the dogs that he owned. He said that a deputy from the Hillsdale County Sheriff's Office came out to his home a week prior and told him he needed to decrease the number of dogs that he had on his property. The deputy then told Steury that he would be back in a week or so to check on his progress. Steury then asked if I could take eighteen (18) dogs from him. I told him that I couldn't pay for them at this time and Steury said that he didn't care and that he just needed them gone for now. Steury then told me that any dogs he couldn't get rid of by the end of the next day he would move to his son-in-law's property.

32. It is my strong belief that Steury is selling these dogs to the public without regard to their health, and in some cases knowing them to be in poor health. Based on my conversations with Steury, he is aware of the licensing and regulatory requirements, and well as the health requirements for commercial breeders, but does not care that he is not in compliance with those requirements. In regard to overall care and selling of the dogs he told me that "he isn't as bad as

some of his friends” and said he hasn’t gotten licensed because he “hasn’t gotten around to it yet.”


33. I personally know that Steury is selling his dogs directly to pet stores. Not only did Steury tell me this, I also went to one of the pet stores he had mentioned (Pet City Pets in Ypsilanti, Michigan) and saw and handled dogs that I know were previously in Steury’s possession. Also, the Monroe SPCA building where I met with Steury and Miller used to be a pet store, and the sign on the building still says “Gator’s Pet Supplies” from the previous owner. Miller and Steury may have assumed that we were also a pet store operating out of that location.

34. To my knowledge Steury is not USDA certified to sell puppies to pet stores and does not have a breeding license. It is my understanding that Steury previously had a USDA license to breed English Bulldogs in 2009, therefore he knows that he is violating the law.

35. I filed a complaint with the Monroe County Sheriff’s Office. A copy of this complaint is included as Attachment O.

36. I have personal knowledge of the facts stated in this affidavit and will testify about them if called upon to do so.

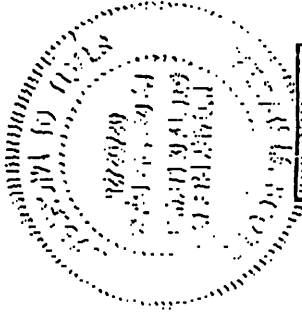
FURTHER, AFFIANT SAYTH NOT.


KATRINA STILLWAGON

Subscribed and sworn to before me
this 24th day of September, 2019.

Megan M Scott

Notary Public
Lenawee County, Michigan
Commission Expires:



Megan M Scott
Notary Public - State of Michigan
County of Lenawee
My Commission Expires February 2, 2025