

STATE OF MICHIGAN
CIRCUIT COURT FOR THE 30TH JUDICIAL CIRCUIT
INGHAM COUNTY

DANA NESSEL, ATTORNEY GENERAL
OF THE STATE OF MICHIGAN,

Petitioner,

v

METOO KITS COMPANY,

Respondent.

No.: 19- *668* -CP

HON.

JUDGE JAMES S. JAMO

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EX PARTE PETITION FOR CIVIL INVESTIGATIVE SUBPOENAS

Introduction

The purpose of a sexual assault medical forensic examination is not only to collect evidence for future criminal justice proceedings, but also to ensure a victim's health care needs are met. *U.S. Dep't of Justice, A National Protocol for Sexual Assault Medical Forensic Examination (2d Ed.)*, p 4.¹ In Michigan, health care

¹ Available at

<https://www.evawintl.org/Library/DocumentLibraryHandler.ashx?id=411>

providers are required to offer a sexual assault medical forensic examination, including the administration of a sexual assault evidence kit, to a consenting victim who alleges a sexual assault within the preceding 120 hours. MCL 333.21527. Aside from collecting evidence of the assault, health care providers also treat injuries, provide medication for the prevention and treatment of pregnancy and sexually transmitted infections, and help victims identify resources for further support. *Nat'l Sexual Violence Resource Center, SART Toolkit Section 5.9.*² Further, health care providers may not bill victims for any portion of the examination or kit. MCL 18.355a(2). See also 34 USC § 10449. The health care personnel that complete the kit are trained to ensure evidence is properly preserved and transmitted to law enforcement, if the victim chooses to report the crime. *Nat'l Sexual Violence Resource Center, SART Toolkit Section 5.9.*

Respondent MeToo Kits Company markets online sexual assault evidence kits for at-home use, and consumers visiting its website can join a waitlist to purchase such kits at an allegedly “pocket-friendly” price. Exhibit 1.³ At the same time, Respondent criticizes the traditional process for collecting sexual assault evidence and suggests that its product can collect accurate factual evidence of a sexual assault that may be admissible in a court of law. *Id.* Thus, the Attorney

² Available at <https://www.nsvrc.org/sarts/toolkit/5-9>

³ After receiving a Notice of Intended Action from the Attorney General, Respondent recently made changes to its website, but Exhibit 1 provides a snapshot of the website as of August 28, 2019.

General seeks this Court's authorization to proceed with an investigation under the Michigan Consumer Protection Act (the Act), 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 an investigative subpoena under section 7 of the Act, MCL 445.907, which provides in pertinent part:

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 an *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 an alleged violation of this act. MCL 445.907(1).

2. The Attorney General has probable cause to believe that acts or practices defined as unlawful under the Act have occurred and continue to occur, as set forth below.
3. Respondent MeToo Kits Company is a Delaware corporation. Its website provided a contact address in Brooklyn, New York.
4. Respondent conducts business in Ingham County and elsewhere by offering via its publicly accessible website at-home sexual assault evidence kits. Although the kits are currently unavailable to purchase, Michigan consumers may click a link to "GET THE KIT," which allows them to provide contact information to join a "waitlist" for purchasing a kit. Exhibit 1.
5. Ingham County is an appropriate venue for this Petition.

Factual Allegations

6. The Attorney General became aware of Respondent's business practices as Respondent is marketing its at-home kits to college and university campuses by contacting stakeholders. *Campus Advocacy & Prevention Professionals Ass'n, Position on "Me Too Kits."*⁴
7. Respondent operates a publicly accessible website at www.metookit.com.
8. On August 29, 2019, the Attorney General sent Respondent a Notice of Intended Action, which requested that Respondent provide assurances that it would not sell its at-home kits in Michigan. Exhibit 2.
9. Respondent refused to provide the requested assurances, but nevertheless immediately made changes to its website in reaction to the Attorney General's concerns. This petition will use the present tense to describe the current website and will use the past tense to describe information previously on the website that has subsequently been removed.
10. The website promotes what is purported to be a sexual assault evidence kit for at-home use.
11. Respondent criticizes sexual assault kits administered by law enforcement, suggesting that its at-home kit is "designed to address the problem associated with traditional sexual assault kits available to survivors[.]"
12. Respondent claims its at-home kit "empowers survivors to accurately collect evidence in a setting and timing of their choice."

⁴ Available at <http://www.nationalcappa.org/me-too-kits>.

13. Respondent claims that its at-home kit does not require any specialized training to be administered.
14. Respondent claims that its at-home kit is both private and secure; however, its Privacy Policy states that it cannot guarantee “the security or privacy of your information.”
15. Respondent claimed its at-home kit comes with a mobile application, video services, and 24/7 Support. *Id.* Respondent continues to advertise a mobile application but has removed statements regarding video services and 24/7 Support.
16. Respondent claims that its at-home kit “comes at a pocket-friendly price,” but no specific price is provided on Respondent’s website. *Id.*
17. Respondent claimed that its kits “can provide the necessary factual evidence required in a court of law to identify a sexual predator’s involvement with sexual assault” and that it had “spoken with” the legal community and “trust[s]” its at-home kit “will be admissible in court.” *Id.* Respondent has since changed its tune, stating as follows: “We have a multi-step plan so that the kit retains chain of custody. However, there is no guarantee that any of the evidence collected as a result of the use of this product will be admissible in court.”
18. Respondent discourages university students from reporting sexual assaults by claiming the “documentation process largely deters students from reporting” sexual assaults because “[d]ocumentation can be an arduous

process, and some students may lack the proper transportation, financial resources, facilities and confidence required to move forward.”

19. Respondent claimed it does not provide a medical device regulated by the United States Food and Drug Administration (FDA) and does not need to be Health Insurance Portability and Accountability Act (HIPAA) compliant. *Id.* Respondent has since removed these statements from its website.

20. Respondent markets its at-home kit for personal and household use and claims that simply buying a kit will deter sexual assault: “We create the analogy as follows -- you do not buy a fire alarm for the 364 days you do not have a fire, you buy it for the one day you do. We trust this to be a deterrent for sexual assault. We also trust this to be so well received; that households across the world are buying these for themselves and loved ones, not only as a viable resource, but as a symbol of protection and hopeful deterrent to assault.”

21. Respondent plans to augment its sales “via a consumer campaign on a crowdfunding platform, in conjunction with sales in pharmacies.”

22. Respondent’s founder, Madison Campbell, posted a video of a business pitch online in which she described the company. The video was promptly removed from YouTube by Ms. Campbell upon receipt of the Attorney General’s Notice of Intended Action, but the video is attached as Exhibit 3 to this Petition.

23. In the video, Ms. Campbell suggested the at-home kit does not require involvement of the “authorities” or “hospital intervention.” *Id.*

24. Campbell suggested that if a victim of sexual assault approaches a hospital or law enforcement for assistance after an assault, the process would be too time consuming, a victim will be “poke[d] and prod[ed]” for four to six hours, and authorities would question the victim’s truthfulness. *Id.*
25. Campbell suggested that all a victim of sexual assault needs to do after an assault is “swab, spit and seal,” and discourages victims from obtaining appropriate medical treatment following a sexual assault. *Id.*
26. Campbell alleged that 400,000 sexual assault evidence kits are backlogged “in the police headquarters all over the place” and “no one has ever done anything about it.” *Id.*
27. When asked about when the evidence needs to be collected, Campbell alleged that evidence generally needs to be collected within 72 hours, but hospitals will complete a kit up to 96 hours after an assault. *Id.*
28. Campbell alleged some law enforcement disapprove of at-home kits because police are “corrupt.” *Id.*
29. Campbell stated that currently, victims will still need to complete a police report, but the company’s intent for the future is to eventually “take over the entire department” and eventually open its own laboratory for testing so that the company can “take over the entire process.” *Id.*
30. Although the company’s website does not provide pricing, Campbell stated the plan is to charge universities \$50 per kit and to charge consumers \$20 per kit, even though the manufacturing cost to the company is only \$3 to \$5. *Id.*

31. In Michigan, if an individual informs health care personnel that they have been the victim of criminal sexual assault within the preceding 120 hours, health care personnel must inform the individual of the availability of a sexual assault medical forensic examination, including the administration of a sexual assault evidence kit. If the individual provides consent, the examination must be performed, including the kit. Health care personnel must also inform the individual of Michigan legal requirements for payment for the procedure. MCL 333.21527.
32. Health care providers in Michigan may not bill victims of sexual assault “for any portion of the costs” of the examination, “including any insurance deductible or copay, denial of claim by an insurer, or any other out-of-pocket expense.” MCL 18.355a(2).
33. In fact, Michigan, like all states that receive federally funded Grants to Combat Violent Crimes Against Women, must ensure that sexual assault forensic examinations are provided without charge to victims. 34 USC § 10449.
34. Michigan law prevents health care providers from releasing the sexual assault kit evidence to law enforcement without the victim’s written consent. MCL 752.933; see also MCL 18.355a(10). If written consent is not provided, health care providers must store the kit for a minimum of one year and must provide the victim information regarding the provider’s storage policies and

how the victim can have the evidence released to law enforcement in the future. MCL 752.933.

35. The purpose of Michigan SAFE (sexual assault forensic examination) is not simply to collect evidence, but to evaluate the victim's health care needs and determine treatment for injuries. *Crime Victim Services Commission, SAFE Response Brochure*, attached as Exhibit 4. However, victims can ask the health care provider to stop the exam at any time. *Id.*
36. Through Michigan SAFE, victims receive emotional support and advocacy to support healing, even if they forego contacting law enforcement. *Id.* Most importantly, victims will never be blamed because sexual assault is never the victim's fault. *Id.*
37. Examinations provided by health care professionals include prophylactic treatment for sexually transmitted infections and pregnancy. *Nat'l Sexual Violence Resource Center, SART Toolkit Section 5.9.*
38. The standard examination in Michigan is very specific and detailed, and it requires specially trained professionals to collect, prepare, and preserve biological and physical evidence in accordance with industry standards. Nye Affidavit attached as Exhibit 5.
39. If evidence is not collected by a trained professional, there is concern the evidence will lack the integrity needed to provide useful DNA information. *Id.*

40. Foreign DNA that is extracted from the kit and processed in a crime laboratory is entered into state and national databases using the FBI's Combined DNA Index System (CODIS). *Nat'l Sexual Violence Resource Center, SART Toolkit Section 5.9.*
41. CODIS analyzes the DNA information to link violent crimes to known and unknown offenders and may help identify or eliminate suspects. *Id.*
42. Samples collected by Respondent's at-home kit will not be eligible for CODIS unless law enforcement first determines that a crime has been committed. *Douglas Hares, PhD, FBI Laboratory, Letter to CODIS Administrators and Alternates, attached as Exhibit 6.*
43. Once evidence is collected, chain of custody must be properly maintained. *Nat'l Sexual Violence Resource Center, SART Toolkit Section 5.9.*
44. Chain of custody must be documented to ensure that evidence presented in court is derived from the samples collected in administering the examination. *Id.* See also *People v Curry*, 39 Mich App 412, 417-418 (1972).
45. Michigan is a national leader in efforts to test previously untested sexual assault kits, and victims in Michigan can track a kit's progress through the system. Exhibit 5.
46. Respondent listed on its website the following partners: Future Labs – NYU Tandon, Wilson Sonsini Goodrich & Rosati, and Alchemist Accelerator. Exhibit 1. NYU has since stated that it has not partnered with

Respondent, and Respondent has removed the partnership information from its website. NYU Statement, attached as Exhibit 7.

Violations of the Act

47. When a business represents that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have, that business has engaged in an unfair, unconscionable, or deceptive business practice. MCL 445.903(1)(c).
48. Similarly, a business may not cause a probability of confusion or of misunderstanding as to the legal rights, obligations, or remedies of a party to a transaction. MCL 445.903(1)(n).
49. The above allegations demonstrate probable cause that Respondent markets an at-home sexual assault evidence kit as a household device capable of producing accurate factual evidence, even though Respondent cannot ensure such accuracy. Nor can Respondent ensure its kits will provide proper evidentiary chain of custody and admissibility in future court proceedings. Respondent also claims that simply purchasing its kit will act as a deterrent for future sexual assaults, which is absurd and untrue. Further, Respondent markets the at-home kit as ensuring individual privacy and security, even though Respondent's own Privacy Policy states individual privacy and security cannot be guaranteed. These actions constitute unfair, unconscionable, or deceptive business practices. MCL 445.903(1)(c) and (n).

50. Further, a business may not fail 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. MCL 445.903(1)(s).

51. It is also unlawful for a business to fail to reveal facts that are material to the transaction in light of representations of fact made in a positive manner. MCL 445.903(1)(cc).

52. The above allegations demonstrate probable cause that Respondent fails to reveal that in Michigan, hospitals must offer sexual assault kit administration to any individual that claims to have been sexually assaulted within the past 120 hours; instead Respondent provides inaccurate information about hospital-administered sexual assault kits. Further, Respondent does not disclose that a health care provider in Michigan cannot bill individuals for the cost of administering a sexual assault kit. At the same time, Respondent permits consumers to join a waitlist to purchase an at-home kit at a "pocket-friendly price" that allegedly will be in the range of \$20-\$50. Respondent also suggests that examinations administered by health care providers will ultimately lead to the victim's veracity being questioned and law enforcement mishandling of the evidence due to backlogs, which is not the case in Michigan. These acts constitute unfair, unconscionable, or deceptive business practices. MCL 445.903(1)(s) and (cc).

53. While Respondent edited its website as a result of the Attorney General's Notice of Intended Action, Respondent's marketing continues to demonstrate probable cause that the Act has been violated and is currently being violated.

Conclusion and Relief Requested

Based on the above, the Attorney General seeks authorization to issue subpoenas compelling Respondents to provide:

- (1) The number of Michigan consumers on Respondent's waiting list for future purchase of Respondent's at-home kit. At this time, Respondent need not provide consumer's names.
- (2) Copies of all correspondence with Michigan colleges, universities, or businesses regarding distribution or redistribution of Respondent's at-home kit to Michigan consumers.
- (3) Copies of all evidence Respondent has to support the following statement:
"We have spoken with many district attorneys, criminal defense lawyers, civil lawyers, and our own legal team and trust with the utmost certainty this will be admissible in court. We have a multi-step plan to ensure everything, including the kit creation, to testing is handled with the utmost care, to retain proper chain of custody."
- (4) Evidence describing Respondent's relationship with the following partners listed on its website: Future Labs- NYU Tandon, Wilson Sonsini Goodrich & Rosati, and Alchemist Accelerator.

The Attorney General also seeks investigative testimony from Respondent's management, Madison Campbell and Liesel Vaidya, to gain more information about Respondent's business practices.

Respectfully submitted,

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Attorney General



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Dated: September 9, 2019

Dana Nessel, Attorney General of the State of Michigan

v

*MeToo Kits Company
Ingham County - 30th Circuit Court*

INDEX OF EXHIBITS

Exhibit 1 – MeToo Kits Website 8/28/2019

Exhibit 2 – Notice of Intended Action 8/29/2019

Exhibit 3 – Madison Campbell MeToo Kits Business Pitch YouTube Video

Exhibit 4 – Crime Victim Services Commission, SAFE Response Brochure

Exhibit 5 – Affidavit of Jeff Nye

**Exhibit 6 – Douglas Hares, PhD, FBI Laboratory, Letter to CODIS Administrators
and Alternates**

Exhibit 7 – NYU Statement Email

Dana Nessel, Attorney General of the State of Michigan

v

MeToo Kits Company

Ingham County - 30th Circuit Court

EXHIBIT 1



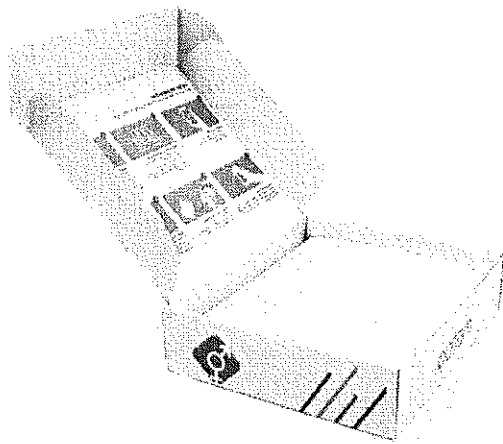
The First Ever Sexual Assault Evidence Kit For At-Home Use

MeToo is founded on the principle that you should be able to take back control.

Your experience. Your kit. Your story. Your life.
Your choice.

Every survivor has a story, every survivor has a voice.





**At MeToo Kit Company,
we have designed the first
at-home kit for commercial use.**

Evidence collection is administered within the confines of the survivor's chosen place of safety. MeToo also provides additional means of support via our mobile application, eliminating the guesswork out of the documentation process, and allowing the survivor to focus on what matters most: **their recovery.**

**The MeToo Kit is designed to address
the problem associated with traditional
sexual assault kits available to survivors.**

Most importantly, our kit empowers survivors to accurately collect evidence in a setting and timing of their choice.

GET THE KIT

How To Use



SWAB

Swab the areas indicated in the instructions.



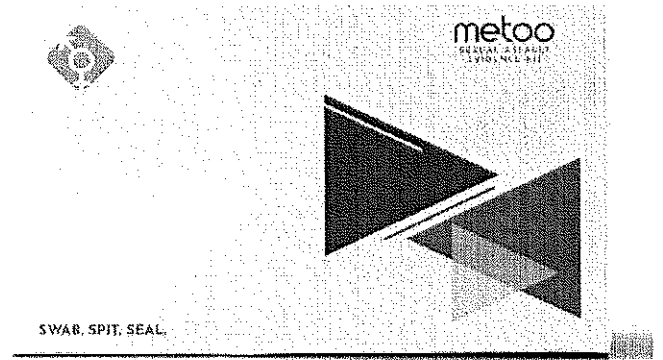
SPIT

Spit into the provided container.

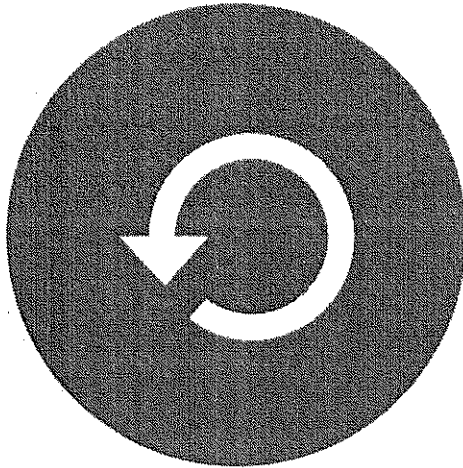


SEAL

Seal all of the collections as well as clothing articles in the packaging provided.

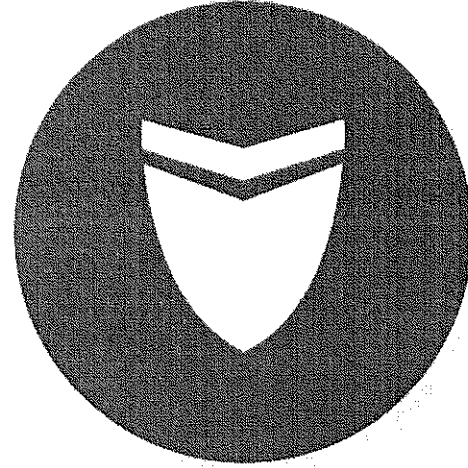


Features



Ease Of Use

The design of the MeToo Kit ensures that it can be used practically by anyone of any gender, ethnicity, religion, race, or sexual orientation. It is truly universal and does not need any specialized training to be



Security

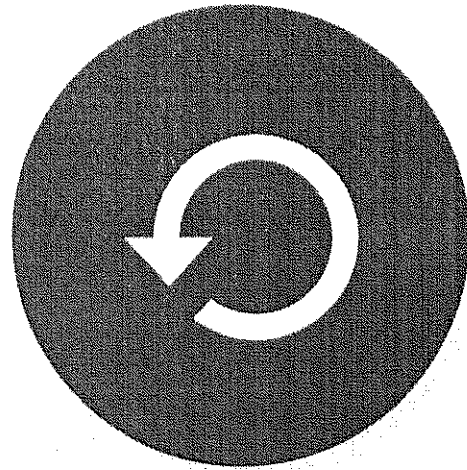
With the MeToo Kit, you can say goodbye to worries over the confidentiality of your details and information. We provide security safeguards and implement controls designed to protect your information.

administered, unlike most of the standard DNA evidence retrieval kits for sexual assault survivors.



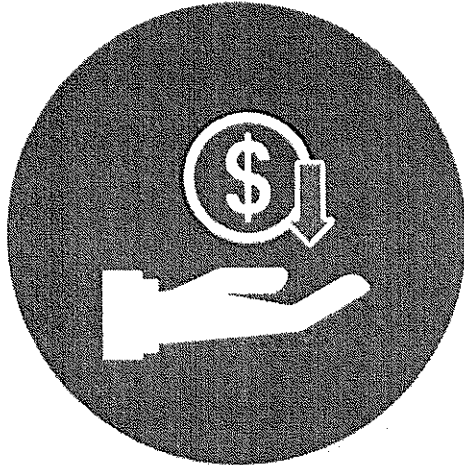
Privacy

You choose precisely the information you want to share while using the MeToo Kit. You are in total control of what you release.



Video Services

Another outstanding feature of the MeToo Kit, is our video recording service which enables a second layer of documentation, further protecting survivors.



Affordability

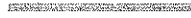
The MeToo Kit comes at a pocket-friendly price. You can also pre-order right here on our website.



24/7 Support

MeToo Kit offers 24/7 live support services. We can assist through the documentation process and connect our users with the most helpful resources.

Mobile App



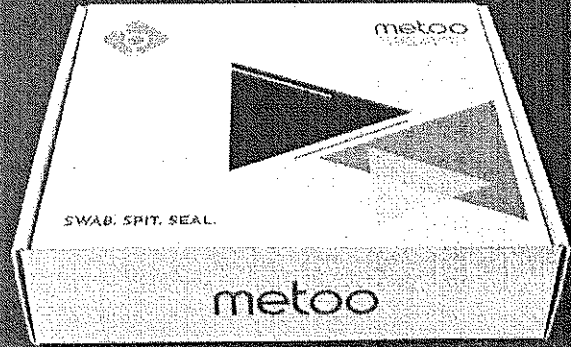
MeToo App Works Hand In Hand With The Kit

MeToo Kit integrates a user friendly mobile application, so our users receive step-by step guidance and support.

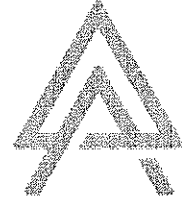
Why Is The MeToo Kit Important?

With MeToo Kit, we are able to collect DNA samples and other tissues, which upon testing can provide the necessary factual evidence required in a court of law to identify a sexual predator's involvement with sexual assault.

[GET THE KIT](#)



In Partnership With



ALCHEMIST ACCELERATOR

Resources

[University Pilot](#)

[Program](#)

[Privacy Policy](#)

[FAQs](#)

[Blog](#)

[Pre-Order Kit \(Coming](#)

[Soon\)](#)

Contact Us

MeToo Kits Company, HQ

370 Jay Street, 7th Floor

Brooklyn, NY, 11201

info@metookit.com

Follow Us



For immediate help, contact the National Sexual Assault Hotline

1-800-656-4673 | Free, Confidential, 24/7



University Pilot Program



MeToo Kit is an empowering adjunct resource to any university's sexual health and safety strategy on campus. Approximately 1 in 4 women and 4% of men experience some form of sexual assault while in college, with the risk of assault being highest during their first few months on campus.

A further issue on campuses is the non-reporting of such sexual assault cases.

We at MeToo believe that the documentation process largely deters students from reporting these violent crimes.

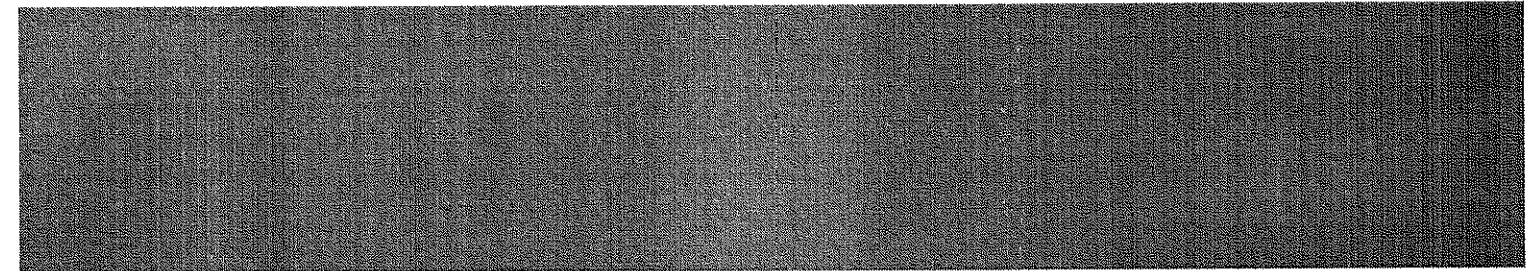
Documentation can be an arduous process, and some students may lack the proper transportation, financial resources, facilities and confidence required to move forward.

The MeToo Kit empowers a survivor of sexual assault to document crucial DNA evidence within their chosen space of safety and in a timely manner, thus preserving the documentation at the standard by which courts would deem admissible and allowing the survivor to quickly shift their focus to self care support and recovery.

Every campus must have a plan.

Every campus must have resources for sexual assault survivors.

Every campus needs MeToo Kit.



Resources

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[Privacy Policy](#)

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Soon)

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For immediate help, contact the National Sexual Assault Hotline

[1-800-656-4673](tel:1-800-656-4673) | Free, Confidential, 24/7

MeToo Kit Privacy Policy

MeToo Kit and its affiliates (“MeToo Kit,” “we,” “our,” and/or “us”) value the privacy of individuals who use our website and related services (collectively, our “Services”). This privacy policy (the “Privacy Policy”) explains how we collect, use, and share information from or about MeToo Kit users (“Users”) or their devices. By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our Terms of Service.

Information We Collect

We may collect a variety of information from or about you or your devices from various sources, as described below.

If you do not provide your information when requested, you may not be able to use our Services if that information is necessary to provide you with our Services or if we are legally required to collect it.

A. Information You Provide to Us.

Registration and Profile Information. If you subscribe for notifications or updates or register to use our Services, we ask you for your name, email address, and any other information we collect.

Communications. If you contact us directly, we may receive additional information about you. For example, when you contact our Customer Support Team, we will receive your name, email address, the contents of a message or attachments that you may send to us, and other information you choose to provide. If you subscribe to receive updates, then we will collect certain information from you, such as your email address. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.

Voice or Video Information. If you choose to provide this information to us, we will receive your voice and video recordings. For example, a video interface is available that allows you to record yourself completing one or more component of the collection process, if you choose.

B. Information We Collect When You Use Our Services.

Location Information. When you use our Services, if you allow us, we will receive your precise location information. For example, we use your location information to provide you with locations near you. We also infer your more general location information (for example, your IP address may indicate your more general geographic region).

Device Information. We receive information about the device and software you use to access our Services, including internet protocol (IP) address, web browser type, operating system version,

phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

Usage Information. To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, the searches you conduct, and the dates and times of your visits.

Information from Cookies and Similar Technologies. We and third party partners collect information using cookies, pixel tags, or similar technologies. Our third party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services.

Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

C. Information We Receive from Third Parties.

Other third parties. We may receive additional information about you from third parties such as data or marketing partners and combine it with other information we have about you.

How We Use the Information We Collect

We use the information we collect:

- To provide, maintain, improve, and enhance our Services;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you;
- To personalize your experience on our Services such as presenting tailored content;
- To send you text messages and push notifications;
- To de-identify and aggregate information collected through the Services and use it for any lawful purpose;
- To find and prevent fraud, and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is

collected.

How We Share the Information We Collect

We may share or otherwise disclose information we collect from or about you as described below or otherwise disclosed to you at the time of the collection.

Affiliates. We may share any information we receive with our affiliates and partners for any of the purposes described in this Privacy Policy.

Vendors and Service Providers. We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.

Marketing. We do not rent, sell, or share information about you with non-affiliated companies for their direct marketing purposes, unless we have your permission.

Analytics Partners. We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/>, and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

Advertising Partners. We work with third party advertising partners to show you ads that we think may interest you. These advertising partners may set and access their own cookies, pixel tags and similar technologies on our Services and they may otherwise collect or have access to information about you which they may collect over time and across different online services. Some of our advertising partners are members of the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1#!/>) or the Digital Advertising Alliance (<http://optout.aboutads.info/?c=2&lang=EN>). If you do not wish to receive personalized ads, please visit their opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt out of personalized ads in mobile apps.

As Required By Law and Similar Disclosures. We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. For the avoidance of doubt, the disclosure of your information may occur if you post any objectionable content on or through the Services.

Merger, Sale, or Other Asset Transfers. We may disclose and transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or

merged with another company or we sell, liquidate, or transfer all or a portion of our business or assets.

Consent. We may also disclose information from or about you or your devices with your permission.

Your Choices

Location Information. You can prevent your device from sharing precise location information at any time through your device's operating system settings. However, location is core to our Services and without it, you may not be able to successfully use all functionality of our Services.

Marketing Communications. You can unsubscribe from our promotional emails via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.

Do Not Track. There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.

If you choose not to provide us with information we collect, some features of our Services may not work as intended.

Third Parties

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

Security

We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. However, as our Services are hosted electronically, we can make no guarantees as to the security or privacy of your information.

Children's Privacy

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our Services are directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at info@metookit.com.

International Visitors

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By providing any information, including personal information, on or to the Services, you consent to such transfer, storage, and processing.

Update Your Information or Pose a Question

You can update your account and profile information through your profile settings. If you have questions about your privacy on the Services or this Privacy Policy, please contact us at info@metookit.com.

Changes to this Privacy Policy

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through the Services, we will notify you through the Services, by email, or other communication.

Contact Information

If you have any questions, comments, or concerns about our processing activities, please email us at info@metookit.com or write to us at MeToo Kits Company, NYU, 370 Jay Street, 7th floor, Brooklyn, NY 11201.

Last Updated: 08/20/2019.



Frequently Asked Questions

- **Do we need to be FDA approved? Do we need to be HIPAA-Compliant?**

We will not need to be FDA approved because we are a forensics device, not a medical device. We will not need to be HIPAA Compliant because we are not holding healthcare data. We plan on being GDPR compliant to ensure safety of sensitive data.

- **Will this be admissible in court?**

We have spoken with many district attorneys, criminal defense lawyers, civil lawyers, and our own legal team and trust with the utmost certainty this will be admissible in court. We have a multi-step plan to ensure everything, including the kit creation, to testing is handled with the utmost care, to retain proper chain of custody. We will also be lobbying for support in the future, across multiple bodies of both federal and state jurisdictions.

- **Do I buy this before or after I've been sexually assaulted?**

We create the analogy as follows -- you do not buy a fire alarm for the 364 days you do not have a fire, you buy it for the one day you do. We trust this to be a deterrent for sexual assault. We also trust this to be so well received; that households across the world are buying these for themselves and loved ones, not only as a viable resource, but as a symbol of protection and hopeful deterrent to assault.

- **Where do I buy the kit?**

Right now, our strategy is B2B sales, however, in the future, we look forward to augmenting sales via a consumer campaign on a crowdfunding platform, in conjunction with sales in pharmacies.

- **Where do I take the kit after I'm done with it?**

To the police or Title IX office, where you will need to file an official police report or Title IX report.

- **Is there an expiration date for the product?**

There is no expiration date for the product.

Resources

[University Pilot](#)

[Program](#)

[Privacy Policy](#)

[FAQs](#)

[Blog](#)

[Pre-Order Kit \(Coming](#)

Contact Us

MeToo Kits Company, HQ

370 Jay Street, 7th Floor

Brooklyn, NY, 11201

info@metookit.com

Follow Us



Soon)



For immediate help, contact the National Sexual Assault Hotline

1-800-656-4673 | Free, Confidential, 24/7



August 23, 2019

The Origin Of The MeToo Movement

Sexual harassment is on the uprise in the world today, and there is a need to curb this harassment. This has therefore laid foundation for the origin of the MeToo Movement.

Resources

[University Pilot](#)

[Program](#)

[Privacy Policy](#)

[FAQs](#)

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Introduction to the MeToo Movement

The MeToo Movement started in 2006, when Tarana Burke, an African-American civil rights activist and involved in community organizing from The Bronx - New York started using the phrase, "Me Too". She hoped to promote empowerment through empathy amongst women of color who have been sexually abused. Her inspiration came from her silence after seeing a 13 year old girl confide in her about being sexually abused. In her words, she should have just responded "Me Too". Tarana started the movement and caused people to speak up about their sexual abuse experiences.

However, it didn't get enough popularity until American actress, Alyssa Milano made a post about it in 2017. Her post did particularly well due to the exposure of predatory behavior by Harvey Weinstein. In October 2017, The New York Times and The New Yorker reported that Weinstein, an American film maker, was accused of rape and sexual abuse by over 80 women in the film industry for a period of at least 30 years. The accusations of rape and sexual abuse made by several young women on Harvey Weinstein made Alyssa Milano make a post about sexual abuse and harassment on her own blog post and then another on her social media which went viral.

Milano's post on Twitter, encouraged victims of sexual assault, especially women and girls, to speak up in

order to have a sense of closure and thousands of young people from different countries engaged the tweet. There was an instant connection to the MeToo movement as many high profile American celebrities such as Jennifer Lawrence, Uma Thurman, Ashley Judd and Gwyneth Paltrow joined in.

Twitter confirmed to CBS News that over 1.7 million tweets included the hashtag, “#MeToo”, with 85 countries that had at least 1,000 #MeToo Tweets. The #MeToo hashtag gave birth to other hashtags that encouraged individuals to share their sexual harassment experiences. These hashtags include: #WhatWereYouWearing #SurvivorPrivilege #YouOkSis #MyHarveyWeinstein

Impact Of The MeToo Movement In Today's Life

It is important to note that the MeToo Movement serves as a voice, or channel for the sexually abused and assaulted. The MeToo movement is to serve as a body so the victims can be able to tell their stories in order to get closure, and also for the perpetrators to be caught, because silence kills.

In the world today, sexual abuse and harassment is on the uprise. In the workplace, at schools, at homes and even in churches, there have been several sexual accusations.

No one is safe anymore and the MeToo movement is now a medium for victims to speak up and make the predator to be caught.

Unlike in the olden days where the victims were quiet and the pain kept eating them before they did something drastic, The MeToo movement has come as a saviour to curb sexual abuse and give victims a voice.

Criticisms Of The MeToo Movement

Every good movement must have criticisms, and the MeToo Movement is not excluded. Many individuals have accused the supporters of the MeToo movement as being liars and trying to deface other individuals

Amongst the critics is Roseanne Barr, a sitcom mother of PAGA. The New York Daily News reported that Barr referred to all the women that came forward with allegations of sexual harassment and abuse as “hoes”. She (Barr) claimed that the women traded sexual favors for money and as such, the MeToo movement is a scam.

Roseanne Barr is not the only one to criticize the MeToo movement, as the South Korean Sex Education system joins the bandwagon. According to the sex ed taught in South Korean schools, "From the perspective of a man who spends a lot of money on dates, it is natural that he would want a commensurate compensation from the woman. In such conditions, unwanted date rape can occur," This system is boldly teaching students that it is okay for a man who spends money to dates to sexually assault a woman.

Many other people criticized the movement, and their general thought was that supporters of the movement were people who traded sexual pleasures for their own gains.

Importance Of The MeToo Movement

The MeToo movement is now a platform for the sexually assaulted and abused to share their experiences and as such, has provided victims with closure and companionship.

Silence kills, and the MeToo movement has helped to create an avenue where the sexually abused can talk about their experiences and then, heal.

Before the MeToo movement, the victims of sexual harassment and assault were not bold enough to voice out their experiences. "What would people say? Would they believe me? Are they going to take me as a pity case?" were some of the questions asked. But since the advent of the MeToo movement, victims can now interact with other victims and as such, communication and sharing became easy.

Conclusion

Sexual harassment and assault traumatizes victims and messes with them psychologically.

Consent is very important and if, there is a movement clamoring for consent, then we should all join the bandwagon.

Resources

[University Pilot Program](#)

[Privacy Policy](#)

[FAQs](#)

[Blog](#)

Pre-Order Kit (Coming Soon)

Contact Us

MeToo Kits Company, HQ

370 Jay Street, 7th Floor

Brooklyn, NY, 11201

info@metookit.com



Follow Us



For immediate help, contact the National Sexual Assault Hotline

[1-800-656-4673](tel:1-800-656-4673) | Free, Confidential, 24/7

Dana Nessel, Attorney General of the State of Michigan

v

MeToo Kits Company

Ingham County - 30th Circuit Court

EXHIBIT 2

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30736
LANSING, MICHIGAN 48909

DANA NESSEL
ATTORNEY GENERAL

August 29, 2019

***First-Class Mail and
Email info@metookit.com***

MeToo Kits Company
370 Jay Street, 7th Floor
Brooklyn, NY 11201

Dear Sir/Madam:

Re: MeToo Kits Company

This letter gives you notice of intended action in accordance with MCL 445.905(2) and provides you an opportunity to immediately cease and desist from engaging in the unlawful business practices described below.

As background, this Office is responsible for enforcement of the Michigan Consumer Protection Act, MCL 445.901 *et seq.* Under this Act, the Attorney General may bring injunctive actions to protect the interests of consumers.

We have learned this week that you are marketing for sale a sexual assault evidence kit, described as the "first ever sexual assault evidence kit for at-home use." Having reviewed your website and other online statements, we are very concerned about these sales and the representations being made to accomplish them.

Your marketing materials do not state the price you are charging, or plan to charge, for these kits. But these materials also fail to explain that such kits are free to Michiganians who seek medical attention for a sexual assault within 120 hours of the assault. The evidence kit is included in a sexual assault medical forensic examination, which by law is provided without charge to the victim. See MCL 333.21527 and MCL 18.355a.

An at-home evidence kit does not address the health care needs of many sexual assault survivors. It assumes the only reason a collection is made is for evidentiary purposes at trial. However, the medical examination is significantly important because it can identify and treat injuries and provide medications for the prevention and treatment of pregnancy, sexually transmitted diseases, and injuries. Medical professionals can also help victims identify resources for emotional support.

Your marketing campaign also assumes and misleads victims into thinking that they are collecting all the evidence that could be collected from the assault. Medical forensic examinations involve the taking of photographs, documentation of injuries, and an anatomically thorough investigation by a qualified professional in an appropriate

August 29, 2019

setting. While your website suggests the at-home kit results will be admissible in Court, we are skeptical about that proposition. Your speculation about such admissibility is a poor justification for sales of a product that appears destined to delay sexual assault victims from seeking prompt medical attention.

Based on the above, the Attorney General has probable cause to believe you are engaged in the following unfair trade practices made unlawful by the Act:

(c) Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has sponsorship, approval, status, affiliation, or connection that he or she does not have.

(n) Causing a probability of confusion or of misunderstanding as to the legal rights, obligations, or remedies of a party to a transaction.

(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.

(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).]

You have ten days within which to provide this Office with assurances of voluntary compliance under the Act. To be acceptable to this Office, such assurances must include an agreement that you will not sell these sexual assault kits to Michigan consumers.

Be advised that we will be filing a petition in Ingham County Circuit Court seeking authority to issue investigative subpoenas. See MCL 445.907. We are extremely concerned about the representations being made as part of your marketing campaign and will be seeking documentation and testimony to better understand them. This is an important consumer and public safety matter, and we will pursue it accordingly.

We look forward to your response.

Sincerely,



Darrin F. Fowler
Katherine J. Bennett
Assistant Attorneys General
Corporate Oversight Division
(517) 335-7632

DFP/cms

Dana Nessel, Attorney General of the State of Michigan

v

*MeToo Kits Company
Ingham County - 30th Circuit Court*

**EXHIBIT 3
THUMB DRIVE**

PASSWORD: CODcivil1

Dana Nessel, Attorney General of the State of Michigan

v

MeToo Kits Company
Ingham County - 30th Circuit Court

EXHIBIT 4

RESOURCES

Michigan Crime Victim Services
Commission

1-877-251-7373 (Victim Only)
1-517-373-7373

www.michigan.gov/crimevictim

Rape, Abuse and Incest National
Network

1-800-656-4673
www.rainn.org

VICTIM ONLY TOLL FREE
1-877-251-7373

S.A.F.E. Response
(PA 223 of 1976)

201 S. Townsend
PO Box 30195
Lansing MI 48933

Phone #: 517-335- SAFE (7233)

www.Michigan.gov/crimevictim



The Michigan Department of Health and Human Services (MDHHS) does not discriminate against any individual or group because of race, religion, age, national origin, color, height, weight, marital status, genetic information, sex, sexual orientation, gender identity or expression, political beliefs or disability.

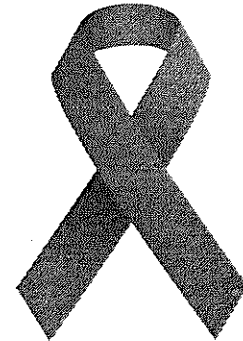
MDHHS PUB-1230

7/18

Michigan Department of
Health and Human Services

CRIME VICTIM SERVICES COMMISSION

S.A.F.E. Response



Telephone: 517-335-SAFE (7233)

S.A.F. E. Response

Sexual Assault Forensic Exam

If you're reading this, chances are someone who cares has given you this brochure because you were a sexual assault victim. This program helps pay for sexual assault forensic exams for people who were sexually assaulted in Michigan.

What is Sexual Assault or Abuse?

Sexual assault and abuse can happen to anyone, including adults, teens and children. Perpetrators use force, intimidation and emotional pressure to sexually assault and abuse another person. Sexual assaults include any type of sexual contact that you do not agree to or want. It is sexual assault or abuse when a perpetrator touches any private areas of your body or uses their fingers, penis or another object to penetrate the vagina, anus or mouth against your will. Perpetrators may assault another person one time or sexually abuse the same person over and over again.

Sexual Assault is NEVER the victim's fault!

All sexual assault victims deserve emotional support and advocacy to heal from the assault, whether they want to go forward with a legal case or not.

What is a Sexual Assault Medical Forensic Exam?

The purpose of this exam is to evaluate your health care needs, determine treatment for any injuries, and collect evidence for potential use for criminal investigation. Survivors can choose to only have parts of the exam and can ask the health care provider to stop at any time. These exams are usually conducted up to four days after a sexual assault.

How can SAFE Response Help?

Sexual assault victims should never be billed or pay for the medical forensic exam.

You do not have to talk with the police or make a police report in order to have the exam done or paid for.

Your health care insurance may be billed for the exam, but if you believe billing your insurance will interfere with your personal privacy or safety, the health care provider can bill SAFE Response for the exam.

SAFE Response can pay your health care provider for the exam and related costs.

What is Not Covered by SAFE Response?

If you have other injuries (like a broken bone) or would like to seek counseling, you may be eligible for assistance through the Crime Victim Services Commission Compensation program.

In order to receive this compensation, you will have to report the assault to the police, participate in the investigation and complete an application to the Crime Victim Services Commission Compensation program.

If SAFE Response pays for the medical forensic exam, it is not guaranteed that you will receive compensation for other medical services or counseling.

For further assistance or information, please call the Crime Victim Services Commission at (517) 373-7373.

If you have been sexually assaulted, please consider calling the national Rape, Abuse and Incest National Network (RAINN) at 1-800-656-4673 to locate a sexual assault service provider program in your area. All services are free and confidential.

Dana Nessel, Attorney General of the State of Michigan

v

MeToo Kits Company
Ingham County - 30th Circuit Court

EXHIBIT 5

AFFIDAVIT OF JEFF NYE

Jeff Nye being first duly sworn, deposes and says as follows:

1. I have worked for the Michigan State Police for the past twenty-three years. For the past three years I have been the Quality Assurance Manager and Assistant Division Director of the Forensic Science Division for the Michigan State Police. Prior to that I was the DNA Technical Leader for nine and a half years. In addition to my duties for the State of Michigan, I also volunteer with the American Society of Crime Laboratory Directors and was recently appointed to the Board of Directors to serve a four-year term.

2. The Michigan State Police have approximately 90 employees dedicated solely to biological evidence testing and an overall forensic science staff of approximately 250 people. I oversee eight labs throughout the State of Michigan with respect to Quality Assurance.

3. Each year, we process approximately 15,000 biology cases, including approximately 4,000 sexual assault kits yearly.

4. I recently became aware of the MeToo Kit, a sexual assault do-it-yourself at home evidence collection product, that is being marketed for the general public. I have been asked if in my professional capacity with the Michigan State Police, I have concerns about the potential impact of this product.

5. I am concerned that this product does not address several scientific issues which may lead to its inability to be useful or effective to consumers and law enforcement officials. In instances where a DNA result can be ascertained, the manner of collection raises serious concerns about whether the time and money

expended on achieving the result will be useful in any actual response from a law enforcement agency, much less a court of law. This means our scientists will spend more time testing evidence kits that have limited potential for criminal justice purposes.

6. The standard medical examination that a sexual assault victim receives is very specific and detailed. Professionals are specifically trained to collect, prepare and preserve biological and physical evidence in accordance with industry standards and laws. It is essential that the sample integrity, quantity and quality are well documented and properly stored for preservation.

7. Contamination, collection and preservation are major concerns for self-collecting. If the sample isn't collected and prepared properly, it is possible that biological activity may destroy the sample or the evidence will become contaminated with extraneous human DNA minimizing the integrity of the evidence.


8. When a victim goes to a medical professional for an examination following a sexual assault, that professional documents exactly where the sample was collected from or the presence of injury. This is important in establishing (for example) whether a victim had been penetrated or if physical force was used. This, in turn, impacts what exact charge the prosecutor may bring. Additionally, the level of detail provided of the sexual assault activity aids the forensic scientist in directing their testing. Without this level of detail, additional resources may be expended than may be necessary.

9. The State of Michigan is among the leaders in the country in the effort to ensure the forensic analysis of sexual assault kits through a web-based tracking

program called "Track Kit." This program allows victims to track the status of their kits through every step of the process. When a kit is performed as part of a forensic medical examination, the victim is provided a tracking number and unique login credentials. The victim can opt for affirmative updates on the status of the kit by text message or email generated from the application; or, the victim may opt to track the status by logging into the application directly. This will allow the victim to inform herself or himself of the progress of the kit during its life cycle..


10. 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.



Jeff Nye

Subscribed and sworn to before me
this 6 day of September, 2019.



Kelly Thomas, Notary Public
Livingston County, Michigan
Commission Expires: 6/10/2024

KELLY THOMAS
NOTARY PUBLIC-STATE OF MICHIGAN
COUNTY OF LIVINGSTON
My Commission Expires June 10, 2024
Acting in the County of Eaton

Dana Nessel, Attorney General of the State of Michigan

v

MeToo Kits Company
Ingham County - 30th Circuit Court

EXHIBIT 6

From: [Hares, Douglas R. \(LD\) \(FBI\)](#)
To: [Hares, Douglas R. \(LD\) \(FBI\)](#)
Subject: MeToo SAK Kit Guidance
Date: Wednesday, September 4, 2019 2:27:03 PM

CODIS Administrators and Alternates:

The CODIS Unit is aware of the MeToo Kits direct marketing to consumers of sexual assault evidence collection kits to be used by a victim for the collection of evidence. A number of organizations have already issued statements critical of this product (National Alliance to End Sexual Violence at <https://njcasa.org/wp-content/uploads/2019/08/NAESV-statement-on-at-home-rape-kits.pdf>; International Association of Forensic Nurses at https://cdn.ymaws.com/www.forensicnurses.org/resource/resmgr/docs/Responding_to_Victim_Adminis.pdf; New Jersey Coalition Against Sexual Assault at <https://njcasa.org/news/njcasa-metoo-kits-have-inherent-flaws-in-forensic-evidence-collection-are-not-supported-by-the-coalition/>; Campus Advocacy and Prevention Professionals at <http://www.nationalcappa.org/me-too-kits>; Oregon Coalition Against Domestic and Sexual Violence at <https://www.ocadsv.org/blog/post/caution-use-metoo-home-kits>; and Michigan Attorney General's Office at https://www.michigan.gov/documents/ag/Notice_of_Intended_Action_to_MeToo_Kits_Company_08-29-19_664596_7.pdf).

As you know, NDIS eligibility of crime scene evidence requires, among other things, documentation that a crime has been committed. Such documentation has generally included a law enforcement case report or other record of the initiation of a law enforcement investigation. A submitting law enforcement agency (and applicable prosecutor) will determine, when presented with the MeToo Kit, whether such a kit is sufficient for initiating a criminal investigation and how to document the chain of custody for purposes of satisfying the relevant state/federal requirements for the admissibility of the evidence. In the absence of any law enforcement involvement, a laboratory's acceptance of a MeToo Kit, without proper documentation from a law enforcement agency that a crime has been committed, will not be sufficient to establish NDIS eligibility.

Douglas Hares, PhD
NDIS Custodian
FBI Laboratory
CODIS Unit
2501 Investigation Parkway
Quantico, VA 22135
703.632.7576
Fax 703.632.8305
Mon - Thurs 6:00am - 4:30pm

Dana Nessel, Attorney General of the State of Michigan

v

MeToo Kits Company
Ingham County - 30th Circuit Court

EXHIBIT 7

Brown, Takisha (AG)

Subject: RE: Me Too Kit Company

From: Fowler, Darrin (AG) <FowlerD1@michigan.gov>
Sent: Friday, September 6, 2019 8:27 AM
To: john.beckman@nyu.edu
Cc: Bennett, Katherine (AG) <BennettK1@michigan.gov>
Subject: RE: Me Too Kit Company

John, thank you for this information and for the quick response.

Darrin F. Fowler
Assistant Attorney General
(517) 335-7632

From: John H Beckman <john.beckman@nyu.edu>
Sent: Friday, September 6, 2019 6:47 AM
To: Fowler, Darrin (AG) <FowlerD1@michigan.gov>
Cc: Scepka, Carrie (AG) <ScepkaC@michigan.gov>; Eric P Rasmussen <epr203@nyu.edu>
Subject: Re: Me Too Kit Company

Dear Mr. Fowler,

I can confirm your understanding of what I said to the NY Post.

MeTooKit is not run by NYU, students, grads, or faculty; does not use technology or intellectual property developed in NYU labs; has no arrangement to sell their product to NYU; and is not in a partnership with NYU. NYU takes no equity and has no stake in the company. NYU manages several business incubators for start-ups in conjunction with NYC and NYS economic development agencies; MeTooKit is one of the start-ups in one of the incubators that our school of engineering manages. The selection process for start-ups to be in those incubator is not done by the University, but by the incubators' professional staff.

I hope this helps.

Sincerely,
John Beckman
Sr. VP for Public Affairs, NYU

On Thu, Sep 5, 2019 at 9:32 AM Fowler, Darrin (AG) <FowlerD1@michigan.gov> wrote:

Good Morning John,

I observe in a NY Post article that NYU has explained it has no affiliation with the Me Too Kit Company, other than leasing space for operations. Can you confirm this? If you have a few minutes, I'd greatly appreciate an opportunity to speak with you. My number is 517.335.7632.

Thank you,

Darrin F. Fowler

Assistant Attorney General

Corporate Oversight Division

Michigan Department of Attorney General

(517) 335-7632

STATE OF MICHIGAN
CIRCUIT COURT FOR THE 30TH JUDICIAL CIRCUIT
INGHAM COUNTY

DANA NESSEL, ATTORNEY GENERAL
OF THE STATE OF MICHIGAN,

Petitioner,

No.: CP

HON.

v

METOO KITS COMPANY,

Respondent.

Katherine J. Bennett (P75913)
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
BennettK1@michigan.gov
FowlerD1@michigan.gov

ORDER AUTHORIZING ISSUANCE OF CIVIL INVESTIGATIVE SUBPOENAS

At a session of said Court, held on

_____, 2019, in the City of Lansing, Michigan.

Present: HON. _____

The Attorney General has presented this Court with an *Ex Parte* Petition for Civil Investigative Subpoenas related to an investigation of Respondent MeToo Kits Company. Through the *Ex Parte* Petition, the Attorney General alleges that there is probable cause to believe Respondent has violated the Michigan Consumer Protection Act (the Act), MCL 445.901 *et seq.*

Having had an opportunity to review these materials, this Court finds that probable cause exists to believe Respondent has violated the Act.

THEREFORE, IT IS ORDERED that the Attorney General, acting through her assistants, is authorized to issue investigative subpoenas to Respondent, and to Respondent's management, Madison Campbell and Liesel Vaidya.

IT IS FURTHER ORDERED that the Attorney General, acting through her assistants, is authorized to issue additional subpoenas seeking testimony and documentation from persons and entities that are identified during the course of this investigation.

IT IS SO ORDERED.

Hon.
Circuit Court Judge