

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30736
LANSING, MICHIGAN 48909

DANA NESSEL
ATTORNEY GENERAL

September 24, 2019

VIA HAND DELIVERY

Peter Miller
2349 E. Montgomery
Hillsdale, MI 49242

Paul Steury
5900 W. Burt Road
Camden, MI 49232

Re: Notice of Intended Action

Dear Mr. Miller and Mr. Steury:

This letter is to give you notice of intended action in accordance with MCL 445.905(2), and to give 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.* Over the past several months, our Corporate Oversight Division has received complaints against your puppy mill operation that is being run at 5900 West Burt Road, Camden, MI, 49232. Through a referral from the Director of Monroe County Animal Control, and additional complaints shared with us by the Humane Society of the United States, we learned that you are selling sick puppies and adult dogs to consumers, and providing false documentation in regard to the breed, age, health, and vaccination records of these animals. The providing of false or misleading information in connection with the sale of goods violates the Michigan Consumer Protection Act.

We have interviewed some of the complainants and have been obtaining supplemental documentation from them. Based on this information, the Attorney General believes that you are engaging in the following unfair and deceptive trade practices made unlawful by the Act:

- (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.

September 24, 2019

- (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)]

You should immediately cease and desist these unlawful business practices, which includes any further sales of any animal. You are also cautioned against getting rid of any of the animals on the premises, this includes moving the animals to a different location or euthanizing them. You have ten days within which to provide this Office with assurances of voluntary compliance under the Act.

Be advised that we will be filing a petition in Hillsdale County Circuit Court seeking authority to issue investigative subpoenas. See MCL 445.907. We are extremely concerned with not only the representations being made to consumers regarding the health, breed and age of the animals that you are selling, but also with the actual health of these animals and the conditions that they are being kept in. This is an extremely important matter to our Office, and we will pursue it accordingly.

We look forward to your response. We are available to meet with you in person or by telephone regarding this matter and look forward to your response.

Sincerely,



Ashlee N. Lynn
Darrin F. Fowler
Assistant Attorneys General
Corporate Oversight Division