

STATE OF MICHIGAN
CIRCUIT COURT FOR THE 39TH JUDICIAL CIRCUIT
LENAWEE COUNTY

THE PEOPLE OF THE STATE OF
MICHIGAN,

Plaintiff,

v

CHADWICK BOSS and BOSS'S PUMP &
WELL SERVICE, LLC, a Michigan limited
liability company,

Defendants.

No. 2026-7871-CZ

HON. HONORABLE
ANNA MARIE ANZALONE

COMPLAINT

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There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint.

COMPLAINT

Plaintiff, the People of the State of Michigan, by and through Nathan Frischkorn and Nicholas T. Sturos, Assistant Attorneys General, states as follows:

NATURE OF THE CASE

1. This is a civil action to prevent Chadwick Boss and Boss's Pump & Well Service, LLC (collectively, Defendants) from engaging in unlawful pump installation and well drilling activities that endanger the public health and have already cost Michigan consumers at least tens of thousands of dollars.

2. The People of the State of Michigan (Plaintiff) seek injunctive relief under Part 127 of the Public Health Code, MCL 333.12701–12715 (Part 127).

3. Plaintiff also seeks injunctive relief and civil fines under the Michigan Consumer Protection Act (MCPA), MCL 445.901 *et seq.*

4. Additionally, Plaintiff seeks dissolution of Boss's Pump & Well Service, LLC under MCL 450.4803(1)(c), which is part of the Michigan Limited Liability Company Act, MCL 450.4101 *et seq.*

PARTIES

5. Plaintiff the People of the State of Michigan is represented by Michigan Attorney General Dana Nessel. The Attorney General is Michigan's chief law enforcement officer and is authorized to bring this action on behalf of the People

of the State of Michigan pursuant to MCL 14.28, MCL 333.2255, MCL 445.905, MCL 450.4803.

6. Defendant Chadwick Boss is a resident of Manitou Beach, Michigan, and is a “person” within the meaning of MCL 333.12701(1)(a) and MCL 445.902(1)(d).

7. Defendant Boss’s Pump & Well Service, LLC is a limited liability company registered in Lenawee County to do business in the state of Michigan and is a “person” within the meaning of MCL 333.12701(1)(a) and MCL 445.902(1)(d).

JURISDICTION AND VENUE

8. This Court has jurisdiction over the subject matter of this action under MCL 600.601(1), MCL 600.605, MCL 445.905(1), and MCL 450.4803.

9. This Court has personal jurisdiction over Defendant Chadwick Boss under Section 701 of the Revised Judicature Act because he is domiciled and present in this state. MCL 600.701.

10. This Court has personal jurisdiction over Defendant Boss’s Pump & Well Service, LLC under Section 711 of the Revised Judicature Act because it is incorporated under Michigan law and carrying on continuous and systemic portions of its business in Michigan. MCL 600.711.

11. Venue in this Court is proper under MCL 600.1627, MCL 445.905(1), and MCL 450.4803.

STATUTORY AND REGULATORY BACKGROUND

Part 127

12. Part 127 regulates water well drilling and well pump installation in the state of Michigan.

13. Executive Reorganization Order 1996-1, MCL 330.3101, transferred all authority, powers, and duties pertaining to Part 127 from the Department of Public Health to the Department of Environmental Quality, which has since been renamed the Department of Environment, Great Lakes, and Energy (EGLE). Executive Reorganization Order 2019-1, MCL 324.99923.

14. MCL 333.12704(1) requires persons to obtain an annual certificate of registration before engaging in the business of well drilling or pump installing.

15. Part 127 contains the following definitions relevant to this Complaint:

- a. A “pump” is “a mechanical equipment or device used to remove water from a well.” [MCL 333.12701(1)(b)];
- b. A “well” is “an opening in the surface of the earth for the purpose of removing fresh water,” among other things. [MCL 333.12701(1)(d)]; and
- c. A “person” is “an individual, partnership, cooperative, association, private corporation, personal representative, receiver, trustee, assignee, or other legal entity.” [MCL 333.12701(1)(a); MCL 333.1106(4)].

16. MCL 333.12714 requires EGLE to promulgate a well construction code to implement Part 127, which EGLE has done. See Mich Admin Code, R 325.1601 *et seq.* (Well Construction Code).

17. Persons engaged in the business of well drilling or of pump installing must comply with both Part 127 and the Well Construction Code. MCL 333.12715.

18. EGLE may bring an injunctive action on behalf of the People of the State of Michigan “to restrain, prevent, or correct a violation of a law, rule, or order . . . which [EGLE] believes adversely affects the public health,” including violations of Part 127. MCL 333.2255.¹

19. “Well drilling” activities include, among other things:

- a. Constructing or repairing a well. [Mich Admin Code, R 325.1606(4)(a)];
- b. Operating a well drilling machine. [Mich Admin Code, R 325.1606(4)(b)];
- c. Chemical treatment of a well. [Mich Admin Code, R 325.1606(4)(h)]; and
- d. Plugging abandoned wells. [Mich Admin Code, R 325.1606(4)(i)].

20. Only a registered well driller—not a registered pump installer—may perform well drilling activities. Mich Admin Code, R 325.1608.

¹ While MCL 333.2255 authorizes the Department of Public Health to pursue injunctive relief, this authority as it pertains to Part 127 was transferred to EGLE by Executive Reorganization Order 1996-1, MCL 330.3101.

21. Registered pump installers and registered well drillers may both perform pump installation activities, which include:

the selection of, and procedure employed in the placement and preparation for operation of, pumps and pumping equipment, including any construction that is involved in making an entrance to the well and also means installing a pitless adapter, well cap, pump drop pipe, suction line, discharge line, water service line, or pressure tank. [Mich Admin Code, R 325.1603(8); Mich Admin Code, R 325.1608.]

22. “Pumping equipment means equipment or materials that are used or intended to assist a pump in withdrawing water from a well,” including specific components such as seals, fittings, piping, and controls. Mich Admin Code, R 325.1604(6).

23. To become a registered well driller or pump installer, an applicant must meet requirements related to experience, education, and moral character, and must then take a test that includes both a written and hands-on portion. Mich Admin Code, R 325.1701; R 325.1701a; R 325.1706.

24. The well construction code prohibits advertising “which indicate[s] or impl[ies] that a person . . . is engaging in the business of well drilling . . . or in the installation of pumps and pumping equipment” without that person having a certificate of registration from EGLE. Mich Admin Code, R 325.1711(1).

Consumer Protection Act

25. The MCPA authorizes the Attorney General to seek injunctive relief, civil fines, and damages on behalf of injured consumers against those who engage in unfair, deceptive, or unconscionable trade practices. MCL 445.901 *et seq.*

26. MCL 445.903(1) prohibits “unfair, unconscionable, or deceptive methods, acts, or practices in the conduct of trade or commerce” including:
- a. “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.” [MCL 445.903(1)(c)];
 - b. “Representing that goods are new if they are deteriorated, altered, reconditioned, used, or secondhand.” [MCL 445.903(1)(d)];
 - c. “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.” [MCL 445.903(1)(e)];
 - d. “Representing that a part, replacement, or repair service is needed when it is not.” [MCL 445.903(1)(j)];
 - e. “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.” [MCL 445.903(1)(s)];
 - f. “Failing, in a consumer transaction that is rescinded, canceled, or otherwise terminated in accordance with the terms of an agreement, advertisement, representation, or provision of law, to promptly restore to the person or persons entitled to it a deposit, down payment, or other payment, or in the case of property traded in but not available, the greater of the agreed value or the fair market value of the property, or to cancel within a specified time or an otherwise reasonable time an acquired security interest.” [MCL 445.903(1)(u)]; and
 - g. “Gross discrepancies between the oral representations of the seller and the written agreement covering the same transaction or failure of the other party to the transaction to provide the promised benefits.” [MCL 445.903(1)(y)].

Skilled Trades Regulation Act

27. Article 11 of the Skilled Trades Regulation Act regulates plumbers and plumbing contractors. MCL 339.5101 *et seq.*

28. MCL 339.6107(1) provides that, “[a] person shall not engage in or work at the business of a plumbing contractor, master plumber, journey plumber, or apprentice plumber unless that person is licensed or registered under this article.”

29. For Article 11 of the Skilled Trades Regulation Act, plumbing means:

the practice, materials, and fixtures, in or adjacent to a building, structure, or premises, used in the installation, maintenance, extension, or alteration of all piping, fixtures, plumbing appliances, or plumbing appurtenances, as defined in the state construction code, in connection with the sanitary drainage or storm drainage facilities, plumbing venting systems, medical gas systems, backflow preventers, and public or private water supply systems. [MCL 339.6103(c).]

GENERAL ALLEGATIONS

Part 127

30. Defendants were previously registered pump installers. (Ex 1, 2024 Certificate of Registration.)

31. Defendants’ Certificate of Registration, which allowed them to perform pump installation activities in Michigan, expired on April 30, 2025, and was not renewed. (Ex 2, January 2025 Invoice; Ex 3, EGLE Invoice Query.)

32. Defendants unlawfully performed pump installation activities on at least the following three occasions after their Certificate of Registration expired, in violation of MCL 333.12704. (Ex 4, Bednarski Aff; Ex 5, Parker Aff; Ex 6, Johnson Aff.)

- a. On August 23, 2025, Defendants unlawfully performed pump installation activity at Al Bednarski’s house in Brooklyn, Michigan, by selecting and preparing for the operation of pumps

and pumping equipment, including by inspecting and removing the pump installed in Mr. Bednarski's well. (Ex 4, Bednarski Aff, ¶ 4.)

- b. On June 12, 2025, Defendants unlawfully performed pump installation activity at Gary Parker's house in Adrian, Michigan, by selecting, placing, and preparing for operation a pump and pumping equipment in Mr. Parker's well. (Ex 5, Parker Aff, ¶¶ 1, 4–5.)
- c. In May 2025, Defendants unlawfully performed pump installation activity at Ryan Johnson's house in Adrian, Michigan, by installing a pump in Mr. Johnson's well. (Ex 6, Johnson Aff, ¶ 3.)

33. Defendants have never been authorized to drill wells in Michigan.

34. Defendants unlawfully performed well drilling activities on at least the following five occasions, in violation of MCL 333.12704. (Ex 4, Bednarski Aff; Ex 5, Parker Aff; Ex 6, Johnson Aff; Ex 7, Motter Aff; Ex 8, Elliot Aff.)

- a. On August 23, 2025, Defendants unlawfully performed well drilling activity at Al Bednarski's house in Brooklyn, Michigan, by applying a chemical treatment to Mr. Bednarski's well. (Ex 4, Bednarski Aff, ¶ 5.)
- b. On June 12, 2025, Defendants unlawfully performed well drilling activity at Gary Parker's house in Adrian, Michigan, by

applying a chemical treatment to Mr. Parker's well. (Ex 5, Parker Aff, ¶¶ 1, 4–5.)

- c. In April 2025, Defendants unlawfully performed well drilling activity at Ryan Johnson's house in Adrian, Michigan, by applying a chemical treatment to Mr. Johnson's well. (Ex 6, Johnson Aff, ¶¶ 2–3.)
- d. In November 2024, Defendants unlawfully performed well drilling activity at Anne Motter's house in Brooklyn, Michigan, by constructing a well at Ms. Motter's house. (Ex 7, Motter Aff, ¶¶ 3, 5.)
- e. In August 2024, Defendants unlawfully performed well drilling activity at Ryan Elliot's house in Milan, Michigan, by beginning construction of a well at Mr. Elliot's house. (Ex 8, Elliot Aff, ¶¶ 4–6.)

35. On May 16, 2025, EGLE sent Defendants a Cease-and-Desist Letter, notifying Defendants that EGLE had received reports Defendants had drilled a well, despite not being registered to do so, and ordering Defendants to cease and desist all well drilling activities, including advertising as a well drilling company. (Ex 9, 5/16/25 Cease-and-Desist Letter.)

36. In addition to sending the May 16, 2025 letter via certified mail, EGLE had Defendants personally served a copy of the letter on June 12, 2025. (Ex 10, 6/12/25 Email.)

37. On July 15, 2025, the Lenawee County Health Department also sent Defendants a letter, ordering Defendants to discontinue all well drilling and pump installation activities in Lenawee County. (Ex 11, 7/15/25 LCHD Letter.)

38. On August 5, 2025, the Jackson County Health Department sent Defendants two violation notices for unauthorized well drilling activities Defendants had performed at two different addresses in Jackson County. (Ex 12, 8/5/25 JCHD Letters.)

39. Defendants knowingly and willfully continued engaging in illegal well drilling and pump installation activities, including advertising well drilling and pump installation services, after receiving EGLE's Cease-and-Desist Letter, and similar notifications from the Lenawee County Health Department and the Jackson County Health Department. (Ex 4, Bednarski Aff, ¶¶ 3–5, 7; Ex 5, Parker Aff, ¶¶ 4–5; Ex 13, Stubbleski Aff, ¶¶ 3–4.)

40. Defendants advertised—and, as of April 16, 2026, still advertise—themselves as engaged in the business of well drilling and pump installing in violation of Mich Admin Code, R 325.1711(1). (Ex 14, 4/16/26 Facebook and Yelp Screenshots.)

41. The lengthy process someone must go through to become a registered well driller is important to protect public health. Because Defendants are not registered, EGLE cannot verify that they have met the necessary requirements for experience, education, and moral character, and they have not been tested as required by the well construction code. (Ex 15, DeYoung Aff, ¶¶ 2–3.)

42. The Well Construction Code includes very specific requirements for well drilling activities, all of which are necessary to protect public health. (*Id.* at ¶¶ 5–6.)

43. As unregistered well drillers, Defendants pose a serious threat to public health. (*Id.* at ¶¶ 7–9.)

44. Defendants have engaged in activity that violates the well construction code and that has directly endangered the public health, including by applying improper chemical treatments to a well. (See Ex 4, Bednarski Aff, ¶¶ 5, 7; Ex 5, Parker Aff, ¶¶ 4–5.)

45. EGLE believes these activities directly endanger the public health, because any violation of the well construction code can jeopardize public health, and improper chemical treatments in particular pose a great risk of introducing deadly bacteria or other contaminants into the water supply. (Ex 15, DeYoung Aff, ¶¶ 5.e., 6, 8.)

Consumer Protection Act

46. Defendants have never been licensed to perform plumbing in the State of Michigan. (Ex 16, Certificate of Licensure.)

47. As described in Paragraphs 32 and 34, and in the subparts below, Defendants performed well drilling, pump installation, and plumbing activities without revealing they do not maintain valid certificates or licenses to do so, in violation of MCL 445.903(1)(s). (Ex 1; Ex 4, Bednarski Aff, ¶¶ 4–5; Ex 5, Parker

Aff, ¶¶ 4–5; Ex 6, Johnson Aff, ¶¶ 2–3; Ex 7, Motter Aff, ¶¶ 3, 5; Ex 8, Elliot Aff, ¶¶ 4–6; Ex 13, Stubleski Aff, ¶¶ 3–4; Ex 16; Ex 17, Leupp Aff; Ex 18, Kotulski Aff.)

- a. On or around July 6, 2025, Defendants performed plumbing work on Susan Stubleski’s water holding tank without a plumbing license, but Defendants did not reveal they did not have a plumbing license. (Ex 13, Stubleski Aff, ¶ 3.)
- b. Ronald Leupp hired Defendants to replace his underground water holding tank and change out some water shut-off valves, and Defendants took a deposit to do this plumbing work without revealing they did not have a plumbing license. (Ex 17, Leupp Aff, ¶¶ 3–4.)
- c. In May 2022, Defendants were hired through a service contract company to address a plumbing issue for Astrid Kotulski, which Astrid paid Defendants parts and labor to complete, and Defendants failed to reveal they did not have a plumbing license. (Ex 18, Kotulski Aff, ¶¶ 3–5.)

48. Defendants failed to return payments to consumers after they requested refunds for services either not completed or services performed at a lower quality than what was represented, in violation of MCL 445.903(1)(u). (Ex 8, Elliot Aff, ¶¶ 6–7; Ex 13, Stubleski Aff, ¶ 6; Ex 17, Leupp Aff, ¶¶ 5–6.)

49. Defendants have also provided services that either went unfinished or did not perform as intended and damaged consumers’ properties, in violation of

MCL 445.903(1)(y). (Ex 4, Bednarski Aff; Ex 5, Parker Aff; Ex 6, Johnson Aff; Ex 7, Motter Aff; Ex 8, Elliot Aff; Ex 18, Kotulski Aff; Ex 19, Alton Aff.)

- a. On August 23, 2025, Al Bednarski paid Defendants to fix his well that had stopped working, but Defendants performed acid treatments that burned a hole in Mr. Bednarski's well, and which did not fix the well. (Ex 4, Bednarski Aff, ¶¶ 4–8.)
- b. On June 12, 2025, Gary Parker paid Defendants to perform basic maintenance on well used for his tenant that was having some troubles, but Defendants' well treatment burned a hole in Mr. Parker's well instead of doing the basic maintenance as purchased. (Ex 5, Parker Aff, ¶¶ 4–7.)
- c. In April 2025, Ryan Johnson paid Defendants to address problems he was having with his well, but Defendants' acid treatment and pump replacement did not work because the well no longer pulled up any water, thus not addressing the problem Mr. Johnson hired Defendants to fix. (Ex 6, Johnson Aff, ¶¶ 2–6.)
- d. In November 2024, Anne Motter paid Defendants to install a new point well for water to her house, but Defendants' installation into her water line was improper which pulled up water with a lot of sand instead of providing clean water. (Ex 7, Motter Aff, ¶¶ 3–7.)

- e. In August 2024, Ryan Elliot paid Defendants to install some form of water treatment on his well; Defendants recommended a replacement pump and a new short well, but Defendants failed to provide water treatment, to create a short well, or to provide the replacement pump. (Ex 8, Elliot Aff, ¶¶ 2–6.)
- f. In May 2022, Astrid Kotulski had her service contract company assign Defendants to fix her plumbing, which included a toilet that was sinking into her mobile home floor, but Defendants failed to re-install the toilet or fix the sinking floor underneath the toilet after she specifically paid the Defendants for parts and labor to fix. (Ex 18, Kotulski Aff, ¶¶ 3–8.)
- g. In March 2025, Laura Alton paid Defendants to get her water back on, but Defendants failed to get Ms. Alton’s water working. (Ex 19, Alton Aff, ¶¶ 2–4.)

50. On at least one occasion, Defendants represented to consumers that they would install a new pump, but they instead installed a used pump, in violation of MCL 445.903(1)(c), (d), and (e). (Ex 6, Johnson Aff, ¶¶ 3–5.)

51. Defendants represented to consumers that they needed pumps replaced to effectuate repairs for the consumers when the consumers’ existing pumps did not need to be replaced, in violation of MCL 445.903(1)(j). (Ex 13, Stubbleski Aff; Ex 19, Alton Aff.)

- a. On or around July 6, 2025, Defendants told Susan Stubleski that she needed a replacement pump, but since Susan canceled her service with Defendants before they could replace her pump, Susan's pump has continued to work fine. (Ex 13, Stubleski Aff, ¶¶ 2–6.)
- b. In March 2025, Defendants told Laura Alton that she needed a replacement pump to get her water back on, but after Defendants replaced her pump, the water still did not work. (Ex 19, Alton Aff, ¶¶ 2–4.)

52. On information and belief, there are additional similarly situated consumers that are not named in this complaint.

COUNT I—VIOLATIONS OF THE PUBLIC HEALTH CODE

53. Plaintiff hereby incorporates by reference and realleges the preceding paragraphs as if fully stated herein.

54. MCL 333.2255 authorizes EGLE to bring an action for injunctive relief through the Attorney General in the name of the people of this state to restrain, prevent, or correct a violation of Part 127 of the Public Health Code, or to restrain, prevent, or correct an activity or condition which EGLE believes adversely affects public health.

55. As detailed in the affidavits of Al Bednarski (Ex 4), Gary Parker (Ex 5), and Ryan Johnson (Ex 6), Defendants engaged in pump installation activities at least 3 times in violation of MCL 333.12704.

56. As detailed in the affidavits of Al Bednarski (Ex 4), Gary Parker (Ex 5), Ryan Johnson (Ex 6), Anne Motter (Ex 7), and Ryan Elliot (Ex 8), Defendants engaged in well drilling activities at least 5 times in violation of MCL 333.12704.

57. As detailed in the affidavit of Ryan Elliot (Ex 8) and shown in Exhibit 15, Defendants advertised themselves as engaged in the business of well drilling for at least the last 20 months, in violation of Mich Admin Code R, 325.1711 and MCL 333.12715.

58. As detailed in the affidavit of David DeYoung (Ex 15), EGLE believes that Defendants' unlawful performance of pump installation and well drilling activities endangers the public health.

COUNT II—VIOLATIONS OF THE CONSUMER PROTECTION ACT

59. Plaintiff hereby incorporates by reference and realleges the preceding paragraphs as if fully stated herein.

60. The Attorney General has the authority to seek injunctive relief for violations of Section 3 of the MCPA under MCL 445.905.

61. Defendants have knowingly done well drilling, pump installation, and also plumbing activities described in Paragraphs 32, 34, and 47 above at least 12 times, without revealing they do not hold these certificates or licenses in violation of MCL 445.903(1)(s).

62. As detailed in the affidavit of Ryan Johnson (Ex 6), Defendants have sold an old or second-hand pump as a new pump at least once in violation of MCL 445.903(1)(c), (d), (e).

63. As detailed in the affidavits of Susan Stubbleski (Ex 13) and Laura Alton (Ex 19), Defendants have represented a pump replacement is required for a repair when the replacement was not needed at least twice in violation of MCL 445.903(1)(j).

64. As detailed in the affidavits of Ryan Elliot (Ex 8), Susan Stubbleski (Ex 13), and Ronald Leupp (Ex 17), Defendants have failed to refund consumers following canceled services because of Defendants' unfulfilled promises at least 3 times in violation of MCL 445.903(1)(u).

65. As detailed in the affidavits of Al Bednarski (Ex 4), Gary Parker (Ex 5), Ryan Johnson (Ex 6), Anne Motter (Ex 7), Ryan Elliot (Ex 8), Ronald Leupp (Ex 17), Astrid Kotulski (Ex 18), and Laura Alton (Ex 19), Defendants have failed to perform services as promised at least 8 times in violation of MCL 445.903(1)(y).

66. The Defendants' MCPA misconduct has been persistent and knowing, because of the continued uncertified well drilling and pump installations following violation notices and cease-and-desist orders and failing to reveal this fact to consumers, and a civil fine is appropriate under MCL 445.905(1).

COUNT III—DISSOLUTION UNDER THE MICHIGAN LIMITED LIABILITY COMPANY ACT

67. Plaintiff hereby incorporates by reference and realleges the preceding paragraphs as if fully stated herein.

68. MCL 450.4803(1)(c) authorizes the Attorney General to seek dissolution of a limited liability company that has repeatedly and willfully conducted business in an unlawful manner.

69. Boss's Pump & Well Service, LLC, as detailed in Paragraph 39 and throughout this Complaint, has repeatedly and willfully conducted business in an unlawful manner.

70. Dissolution of Boss's Pump & Well Service, LLC is appropriate in light of the repeated and willful violations of the Public Health Code and the MCPA.

RELIEF REQUESTED

- A. Find that Defendants violated Part 127 of the Public Health Code;
- B. Permanently enjoin Defendants from engaging in well drilling activities pursuant to MCL 333.2255;
- C. Permanently enjoin Defendants from engaging in pump installation activities pursuant to MCL 333.2255;
- D. Permanently enjoin Defendants from advertising pump installation or well drilling services and order that existing online advertisements be removed, including but not limited to the Yelp and Facebook pages shown in Ex 14;
- E. Preliminarily and permanently enjoin Defendants from creating, owning, operating, managing, or directing any pump installation, well drilling, or plumbing service business in the State of Michigan;

F. Order that any pump installation or well drilling equipment that Defendants own be seized and sold at auction, with the proceeds distributed among the consumers who submitted the affidavits that accompany this complaint;

G. Find that Defendants violated the MCPA;

H. Permanently enjoin Defendants to refund Laura Alton, Al Bednarski, Ryan Elliot, Jeff Ferguson, Ryan Johnson, Astrid Kotulski, Ronald Leupp, Anne Motter, Gary Parker, Susan Stubbleski, and similarly situated consumers;

I. Preliminarily and permanently enjoin Defendants from transferring, spending, selling, or otherwise dispensing of funds or assets that can be used to refund identified and similarly situated consumers;

J. Order Defendants to return payments to Laura Alton, Al Bednarski, Ryan Elliot, Jeff Ferguson, Ryan Johnson, Astrid Kotulski, Ronald Leupp, Anne Motter, Gary Parker, Susan Stubbleski, and similarly situated consumers under the equitable doctrine of money had and received;

K. Order Defendants to pay a \$25,000.00 civil fine for each knowing and persistent violation of Section 3 MCPA pursuant to MCL 445.905(1);

L. Dissolve Boss's Pump & Well Service, LLC in accordance with MCL 450.4803;

M. Grant Plaintiff attorneys' fees; and

N. Grant such other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Nathan Frischkorn

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Dated: May 6, 2026

LF: Boss, Chadwick, et al. (The People v) CC/AG #2026-0450158-B/Complaint 2026-05-06