

STATE OF MICHIGAN
IN THE 3RD JUDICIAL CIRCUIT COURT FOR THE COUNTY OF WAYNE

THE PEOPLE OF THE STATE OF
MICHIGAN,

Plaintiff,

Case No. 26-

-CP

v

HON.

HAILGATEA2, LLC, and JOHN KLEIN,

Defendants.

Jacob M. Satin (P80149)
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*There is no other pending or resolved civil action arising out of the same
transaction or occurrence as alleged in the complaint.*

COMPLAINT

Plaintiff, the People of the State of Michigan, through Assistant Attorney
General Jacob M. Satin, states the following for their complaint:

I. Introduction

Crisp autumn air is punctuated by notes of a drum line and the iconic melody
of a fight song. The low morning sun rises, bathing SUVs and truck beds in a
golden light. Their owners were awake hours ago already, busy with preparation.

There are TVs to set up, coolers to stock, and hot dogs to roast. This is college football in its best form.

These scenes are nostalgic, yet present. They are ephemeral, yet traditional. They are special places and special times. College campuses on gameday Saturdays are—in a literal sense—great American institutions.

Few things in modern life command such reverent loyalty as college football. And that loyalty begets trust. With it comes a shared community that cuts across all swaths of Michiganders. It is what makes college football special.

So, when that trust is broken—when a member of the community preys upon their fellow members—the harm is greater than the sum of its parts. And when that happens, the People look to the Michigan Consumer Protection Act for restitution and protection.

II. Parties, Legal Authority, and Venue

1. Plaintiff, the People of the State of Michigan, is represented by 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. Through the Michigan Consumer Protection Act (MCPA), the People have authorized 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.*

2. According to records maintained by the Michigan Department of Licensing and Regulatory Affairs (LARA), Defendant HailgateA2, LLC (Hailgate) is a Michigan for-profit limited liability company founded by John Klein in 2023.

(Exhibit A.)

3. Hailgate has its principal place of business at 1098 Ann Arbor Road, Ste. 133, Plymouth, Michigan, which is located in Wayne County, Michigan. *Id.*

4. Defendant John Klein (Mr. Klein) is the founder of Hailgate and personally conducted much of the company's activity. He is a resident of [REDACTED] Michigan; a Notice of Intended Action was sent to him in July 2026. **(Exhibit B.)**

5. Thus, Defendant Hailgate is domiciled in Wayne County and Defendant Mr. Klein is a resident of Wayne County. This Court is therefore an appropriate venue in which to file this Complaint.

6. This is an action for violations of the MCPA as well as for relief under the equitable doctrines of unjust enrichment and money had and received. The Attorney General also seeks the dissolution of Hailgate under the Michigan Limited Liability Company Act because it has been used for willful and repeated unlawful conduct.

III. Factual Allegations

7. M-Live published a story on July 21, 2026, highlighting a disturbing trend of consumers reporting issues with tickets and experiences related to that weekend's two-show run by country music artist Morgan Wallen at the Big House in

Ann Arbor. The story named Defendants Mr. Klein and Hailgate as the perpetrators of misrepresentations about the scope of tickets sold by Defendants to this event.¹ According to the article, several consumers complained that they purchased tickets that included “meet and greets” with Morgan Wallen that were never provided. *Id.* No details about the “meet and greet” or tickets were ever delivered before the show, even though money was sent to Defendants to purchase the tickets. *Id.* And, when M-Live’s journalist contacted Mr. Wallen’s team, he was informed that Mr. Wallen never offered such “meet and greet” experiences—confirming that consumers were misled. *Id.*

8. This initial story proved to be the first thread, which, once pulled, revealed longstanding concerns about consumers’ experiences with Defendants. *Id.*

9. Beyond local journalism, the Department of Attorney General received at least ten complaints from consumers alleging MCPA violations by the Defendants from 2024 through the present. These included issues with the Morgan Wallen concert, as articulated above, as well as complaints related to undelivered sports memorabilia, missing refunds, and misrepresentations about tickets to University of Michigan athletic events.

¹ Jane, Sam, “*Morgan Wallen fans allege ticket, VIP scam by Michigan tailgate organizer*” MLive (July 21, 2026), available at: <https://www.mlive.com/news/ann-arbor/2026/07/morgan-wallen-fans-allege-ticket-vip-scam-by-michigan-tailgate-organizer.html> (last access on September 23, 2026).

A. Michigan Sports Memorabilia

10. Upon information and belief, Defendants began their operation as a paid-for tailgate at University of Michigan football games. This proved to be popular amongst a subset of Michigan’s fanbase, and the business grew.²

11. Organically, Defendants offered additional services related to the University of Michigan’s Athletic Department. This included sports ticket sales, bowl game travel packages, and—crucially—the sale of signed sports memorabilia.

12. But cracks began to show. The Department of Attorney General received several complaints, which resulted in affidavits by those complainants, related to the sale of a specific item: a Michigan football helmet signed by the 2025 National Championship Michigan Wolverine Football Team.

13. Three consumers ordered the helmet, but not a single one received it, despite months of attempts to get Defendants to provide the item they paid for. *Id.* Only after this office contacted Defendants, did a single consumer receive a refund.

14. Julianna F. requested a refund—she spent months attempting to get her money back to no avail. (**Exhibit C.**) She was met with ever shifting excuses and delays, which lasted over a year. *Id.* Finally, on July 31, 2026, a person

² Kostiuk, Lauren, “Michigan football fans claim HailGate founder scammed them out of Morgan Wallen tickets, VIP experiences” Click on Detroit (July 23, 2026), available at: <https://www.clickondetroit.com/news/investigations/2026/07/23/michigan-football-fans-claim-hailgate-founder-scammed-them-out-of-morgan-wallen-tickets-vip-experiences/#:~:text=Because%20HailGate%20is%20registered%20in,someone%20and%20felony%20identity%20theft> (last accessed on September 23, 2026).

unknown to her refunded her the purchase price of the helmet on behalf of Defendants. *Id.*

15. Julianna received the refund, after months of asking Defendant Klein for her money, just seven days after the Attorney General sent Defendants a Notice of Intended Action. **(Exhibit B)**. The timing of Defendant's sudden about-face is likely the result of efforts by the State of Michigan—not a sudden discovery that Julianna was right to request a refund.

16. Unfortunately, the issues with consumers did not end with unfulfilled orders for sports memorabilia.

B. Ticketed Tailgates

17. At some point, Defendants began selling tickets to away games for Michigan Football. One such ticket package to the September 6, 2024 Michigan-Oklahoma game in Norman, Oklahoma, sold for hundreds of dollars, which Patrick R. purchased. **(Exhibit E)**. Patrick paid \$1,410 for seven tickets to the game. *Id.* Despite paying Defendants, Patrick did not immediately receive his tickets and instead repeatedly contacted Defendants for his tickets. *Id.* He travelled to Oklahoma without tickets in hand. And the day before the game, on September 5, 2024, Defendant Klein sent Patrick seven tickets. *Id.* Quite suspicious of Defendants, Patrick went to the Oklahoma box office to verify the received tickets. When he arrived, officials there told him that he had been sent six tickets that were illegitimate. *Id.* Only one was an authentic ticket to the next day's game. *Id.*

18. Once contacted, Defendant Klein told Patrick to buy replacement tickets himself, with an assurance that Defendants would reimburse him for the additional costs. *Id.* Patrick did so, spending almost \$2,000 more on replacement tickets. *Id.* Patrick then submitted those receipts and asked for his money back—to date, he has not received a refund. *Id.*

19. In another case, a complaining consumer, Terra K., paid for Michigan Football season tickets, but received different tickets than those she bought. **(Exhibit F.)** The tickets were also supposed to come with on-field access, which no tickets ever did. *Id.*

20. Also, another complaining consumer paid for tickets to both the Oklahoma-Michigan game and a preceding tailgate hosted by Defendants. **(Exhibit G.)** That consumer, Karen S., paid \$235 for tickets to the tailgate that she believed also included two tickets to the game. *Id.* It turned out the package Karen purchased only included the tailgate and *one* ticket to the game—she purchased a second, more expensive ticket later on. *Id.* But before the game, the tailgate was cancelled and she has not yet received her requested refund. *Id.*

21. These types of problems continued to pile up with Defendants' misrepresentations to consumers and unfulfilled sales, with no indication that Defendants were ready to tackle the issue. Instead, most consumers were met with shifting excuses and changing timelines.

22. In addition, throughout these interactions, Defendants implied that they had special access to, or were associated with, the University of Michigan

Athletic Department. Defendants also implied that they were affiliated with the University or, at a minimum, caused confusion that their services were authorized or approved by the University. Lastly, Defendants included the University of Michigan's "M" logo on sold items through their website despite lacking authorization to do so in any capacity. This is evidenced by communications sent to Defendants by the University regarding the pervasive, improper use of the University's trademarked logos. **(Exhibit I.)**

23. The Defendants continued to engage in the sale of licensed and trademarked memorabilia without authority to do so. And consumers continued to make complaints about these misrepresentations until they were blue in the face. No action was taken to protect Michigan fans against Defendant's unlawful business practices, so the unlawful business practices continued.

24. And then, Morgan Wallen came to town.

C. Morgan Wallen Experiences

25. Defendants once again expanded the business, now offering concert tickets to events associated with the Big House. Morgan Wallen—the popular country music artist—announced that he would headline two shows at the

University of Michigan's Big House stadium in July 2026.³ Defendants began offering consumers tickets and ticket packages via their Facebook group.⁴

26. These ticket packages included items like regular floor seating, suite experiences, and, a "Meet and Greet" with Morgan Wallen.⁵ According to the flurry of media attention before and after the shows, Defendants suggested the meetup would last about an hour. In one Facebook post to the Hailgate group, Mr. Klein wrote that the "meet and greet" package "includes meeting him[,] pictures, cocktail hour, and a special grab bag!!!! At the Big House [e]ither night!!!" (**Exhibit J.**)

³ Ablauf, Dave, "Morgan Wallen and Special Guests to Play Two Shows at Michigan Stadium on July 24-25" Mgoblue, (Oct. 30, 2025), available at: <https://mgoblue.com/news/2025/10/30/general-morgan-wallen-and-special-guests-to-play-two-shows-at-michigan-stadium-on-july-24-25> (last accessed on September 23, 2026).

⁴ Jane, Sam, "*Morgan Wallen fans allege ticket, VIP scam by Michigan tailgate organizer*" MLive (July 21, 2026), available at: <https://www.mlive.com/news/ann-arbor/2026/07/morgan-wallen-fans-allege-ticket-vip-scam-by-michigan-tailgate-organizer.html> (last accessed on September 29, 2026).

⁵ Reinhart, Max, "*Morgan Wallen ticket scam has fans blaming 'shady' UM tailgate organizer*" The Detroit News (July 22, 2026), available at: <https://www.detroitnews.com/story/entertainment/music/2026/07/22/um-tailgate-organizer-allegedly-suckered-hundreds-of-morgan-wallen-fans/91017494007/> (accessed September 23, 2026).



HailGate

John Klein · Nov 20, 2025 · Admin

Ladies And Gentlemen, children around the world... the moment you've all been waiting for... Wallen day meet and greet for Friday or Saturday-two people you pick!!!! This is going to be a live raffle as long as I have enough people tonight. I will run it tonight at 9 o'clock.!!

Please comment and use the link below for how many tickets you want to purchase... I will then comment with your numbers if there is a series, I will come at the start and end number....

If you want to buy one outright or two outright, let me know I have them....

It includes meeting him pictures, cocktail hour, and a special grab bag!!!! At the Big House Either night !!!

27. In another, he wrote that "I can only allow so many to take part in which I will call Kissing babies and taking pics' for Wallen . . . Includes a pic and handshake [] hug etc . . . line has to stay moving." (**Exhibit K**)



HailGate

John Klein · Dec 3, 2025 · Admin

I can only allow so many to take part in what I will call "kissing babies and taking pics" for Wallen. It's a \$125 per person donation. I only have so many spots for both days. Comment below if you're ready to do this today and for what day. Only those who commented will I reach out or tag... you will have a limited time to purchase:

Includes a pic and handshake 🤝 hug etc... line has to stay moving.

28. Defendants sold these additional experiences to the Morgan Wallen show for large, additional fees.

29. The problem: Morgan Wallen did not sell or participate in meet-and-greets. Mr. Wallen's team sent Defendants a Cease-and-Desist Letter highlighting this issue. (**Exhibit L.**) Defendant Klein was also reminded he was not authorized to sell "tickets, experiences, and merchandise advertised and offered for sale." *Id.* The origin of these alleged "kissing babies and taking pics" ticket packages remains unclear to Plaintiff.

30. Despite this action by Mr. Wallen and his representatives, Defendants continued to hold out to consumers that the packages were legitimate. They claimed that any misunderstanding was due to Mr. Wallen's legal representatives.⁶ In fact, Mr. Klein told one local newspaper that he was "between a rock and a hard place" because he did not want to "cross" Mr. Wallen.⁷ At no point did he admit the ticket packages were fake.

31. Such behavior suggests that Defendants continued to engage in misrepresentations to consumers about the legitimacy of what was being sold despite strong evidence to the contrary.

⁶ Reinhart, Max, "*Morgan Wallen ticket scam has fans blaming 'shady' UM tailgate organizer*" The Detroit News (July 22, 2026), available at: <https://www.detroitnews.com/story/entertainment/music/2026/07/22/um-tailgate-organizer-allegedly-suckered-hundreds-of-morgan-wallen-fans/91017494007/> (last accessed on September 30, 2026).

⁷ *Id.*

32. These misrepresentations had impacts in the real world. Jerry M., a resident of Arkansas, bought tickets to the concert from Defendants. (**Exhibit M**) Jerry began planning his trip to the show months before, including a non-refundable car rental and rental house. *Id.* In total, Jerry bought four tickets totaling \$2,400. *Id.* He also purchased a whiskey bottle with Mr. Wallen’s likeness for \$120. *Id.* It featured licensed Wallen intellectual property in addition to Wallen’s image.

33. As the show got closer, Jerry repeatedly asked for copies of his tickets. *Id.* Mr. Klein never offered them and never gave a refund, even after it became clear that tickets would not be produced. *Id.* Jerry believed the Wallen concert tickets were legitimate and included special access to the “pit” area below the stage—the last-minute tickets he did purchase in lieu of Defendant’s sale did not include any such upgrades. *Id.* His experience was not likely the only one like this.

34. Frankly, Defendants left these consumers wishing that Mr. Klein was somebody they had never met.

IV. Legal Claims

COUNT I: MICHIGAN CONSUMER PROTECTION ACT VIOLATIONS

35. The Attorney General incorporates the above allegations as though fully set forth here.

36. Defendants, both individually and collectively, have engaged in the following practices made unlawful through the Michigan Consumer Protection Act:

(a) Causing a probability of confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services;

...

(c) “[r]epresent 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;”

...

(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 another;

...

(g) Advertising or representing goods or services with intent not to dispose of those goods or services as advertised or represented;

...

(q) Representing or implying that the subject of a consumer transaction will be provided promptly, or at a specified time, or within a reasonable time, if the merchant knows or has reason to know it will not be so provided.

...

(u) 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.

...

(y) 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)(a), (e), (g), (q), (u), and (y).]

37. The MCPA also contains a specific section describing unfair, unconscionable, or deceptive business practices involving impersonation of governmental entities. MCL 445.903m.

38. A person that is not part of or associated with a governmental entity shall not represent, imply, or otherwise engage in an action that may reasonably cause confusion that the person using or employing the action is a part of or associated with a governmental entity. MCL 445.903m(2)(b); MCL 445.903m(2)(c); MCL 445.903m(2)(d); and MCL 445.903(1)(ll).

39. MCL 445.903m(2), in relevant part, prohibits the following acts by a person that is not part of or associated with a governmental entity.

- (a) Represent, imply, or otherwise engage in an action that may reasonably cause confusion that the person using or employing the action is a part of or associated with a governmental entity;
- (b) Represent, imply, or otherwise reasonably cause confusion that goods, services, an advertisement, or an offer was disseminated by or has been approved, authorized, or endorsed, in whole or in part, by a governmental entity, when such is not true.
- (c) Use or employ language, symbols, logos, representations, statements, titles, names, seals, emblems, insignia, trade or brand names, business or control tracking numbers, website or email addresses, or any other term, symbol, or other content that represents or implies or otherwise reasonably causes confusion that goods, services, an advertisement, or an offer is from a governmental entity, when such is not true.

40. These violations have been committed with respect to each of the above-named consumers. Upon information and belief, Defendants have committed such violations with respect to similarly situated consumers who are yet to be

identified. This lawsuit is brought on behalf of both the known and still to be identified consumers.

COUNT II: EQUITABLE CLAIMS

41. The Attorney General incorporates the above allegations as though fully set forth here.

42. Defendants received funds from consumers, both known and yet to be identified, and have unjustifiably failed to refund that money. Upon information and belief, Defendant Mr. Klein is the owner of Hailgate, and he has derived an unjust financial benefit from these circumstances.

43. Defendants' misconduct is contrary to the common law doctrines of unjust enrichment and money had and received. Claims under these doctrines are thus advanced here by the Attorney General in *parens patriae* on behalf of the above-named consumers and all similarly situated consumers yet to be identified.

COUNT III: MICHIGAN LIMITED LIABILITY COMPANY ACT

44. The Attorney General incorporates the above allegations as though fully set forth here.

45. Defendants have used the limited liability company HailgateA2, LLC, in a pattern of misconduct made unlawful under the MCPA and contrary to the common law as alleged in Count II.

46. Based upon this misconduct, HailgateA2, LLC should be dissolved under MCL 450.4803(1)(c) upon a securing of its money and assets to ensure repayment to all consumers to whom it owes refunds.

IV. Conclusion and Relief Sought

Accordingly, for the reasons set forth above, the Attorney General respectfully requests this Honorable Court enter orders:

- A. Preliminarily and permanently enjoining Defendants from selling any tickets or sports memorabilia affiliated with the University of Michigan or its Athletic Department;
- B. Preliminarily and permanently enjoining Defendants from selling any tickets or memorabilia affiliated with any concerts, past or future, or any other live events occurring at Michigan Stadium in Ann Arbor or any other venue in the State of Michigan;
- C. Preliminarily and permanently enjoining Defendants from spending, assigning, transferring or otherwise dispossessing itself of funds and assets that may be used to make refunds to the identified consumers and all those similarly situated;
- D. Preliminarily enjoining Defendants from retaining any funds contrary to the common law doctrines of unjust enrichment and money had and received with respect to the above identified consumers and all similarly situated consumers when good conscience says it ought to be returned;

- E. Imposing civil fines against Defendants under MCL 445.905 for each and every violation of the MCPA that is found to be knowing and persistent;
- F. Dissolving HailgateA2, LLC in accord with MCL 450.4803 and permanently enjoining Mr. Klein from undertaking any comparable business activity in the State of Michigan;
- G. Awarding costs as this Court deems appropriate; and
- H. Granting such further relief this Court may deem just and proper.

Respectfully submitted,

/s/ Jacob M. Satin

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Dated: October 8, 2026