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

BILL SCHUETTE, ATTORNEY GENERAL OF THE STATE OF MICHIGAN,

Petitioner.

No. 15-

 $\mathbf{v}$ 

HON.

ROYAL PACKAGING COMPANY, INC., and ABASS BEYDOUN in his capacities as its President and Owner,

Respondents.

Darrin F. Fowler (P53464) Attorney for Petitioner Michigan Department of Attorney General Corporate Oversight Division P.O. Box 30755 Lansing, MI 48909 (517) 373-1160

#### EX PARTE PETITION FOR INVESTIGATIVE SUBPOENAS

- 1. The Michigan Attorney General is authorized to file an ex parte petition with the Circuit Court requesting issuance of an investigative subpoena pursuant to Section 7 of the Act, MCL 445.907, which provides in pertinent part:
  - (1) Upon the *ex parte* application of the attorney general to the circuit court in the county where the defendant is established or conducts business or, if the defendant is not established in this state, in Ingham county, the circuit court, if it finds probable cause to believe a person has engaged, is engaging, or is about to engage in a method, act, or practice which is unlawful under this act, may, after *ex parte* hearing, issue a subpoena compelling a person to appear before the attorney general and answer under oath questions relating to an alleged violation of this act....The subpoena may compel a person to

produce the books, records, papers, documents, or things relating to a violation of this act....

- 2. Petitioner is the Attorney General of the State of Michigan, acting pursuant to the powers entrusted to him by the People of this State in the Consumer Protection Act. The Attorney General is informed and has probable cause to believe that Respondents have engaged in methods, acts, or practices in the conduct of trade or commerce which are defined as unlawful under MCL 445.903, as set forth below.
- 3. Respondent Royal Packaging Company, Inc. (Royal Packaging) is a Michigan corporation doing business in Detroit, Michigan. Royal Packaging is, or at least was, engaged in the business of producing and bottling antifreeze/coolant products under two different brand names: North Atlantic and Shur-XXX. Royal Packaging placed these products into a distribution chain with the knowledge and intent that they be sold to Michigan consumers. Respondent Abass Beydoun is the President and owner of Royal Packaging, and resides in Wayne County. In September 2014, Mr. Beydoun advised State officials that Royal Packaging had sold its equipment and is no longer conducting business. (See Affidavit of Scott Ferguson, Exhibit A, ¶8).
- 4. In 2014, the Michigan Department of Agriculture and Rural
  Development Weights and Measures Office investigated Royal Packaging. Through
  this investigation, it was found that the North Atlantic and Shur-XXX brand
  products were not properly labeled as to their freeze point temperatures.

  Laboratory testing on these products revealed that their actual freeze point

temperature was such that they may be ineffective during the course of a Michigan winter, creating the potential for vehicle damage. Further, several bottles of the North Atlantic antifreeze/coolant were found to have a lower quantity than was stated on the label (See Exhibit A). Specifically, the Attorney General has probable cause to believe Royal Packaging has violated the Consumer Protection Act by "[r]epresenting that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have." MCL 445.903(1)(c).

- 5. During a 2014 investigation, the Weights and Measures Office tested ninety-six bottles of North Atlantic antifreeze/coolant. According to the label, these bottles contained 0.9375 gallon, which is equal to 120 fluid ounces. Of these ninety-six bottles, nine were found to contain a quantity less than 120 fluid ounces, with an average deficiency of 2.2 fluid ounces. Two of the bottles exceeded the maximum allowable variation with deficiencies of more than 2.5 fluid ounces. (See Exhibit A).
- 6. In addition, the Department of Agriculture and Rural Development sent eleven samples of Royal Packaging's North Atlantic and Shur-XXX brands of antifreeze/coolant for water content and freeze point analysis by a private laboratory. The results demonstrated that all eleven samples were misbranded with respect to water content and freeze point. The samples were found to freeze at a higher temperature than stated on the bottles. The Shur-XXX label stated a freeze temperature of -34° F; but, of the three bottles tested, the freeze point ranged from -2.56° F to -0.04° F. And, the North Atlantic brand was labeled as providing freeze protection to -20° F; but the fluid in the eight tested bottles froze at

temperatures ranging from -1.48° F to 3.38° F. This laboratory testing demonstrated that these two brands of antifreeze are not effective in a Michigan winter.

- 7. The freeze point problem with the North Atlantic and Shur-XXX brand products manufactured by Royal Packaging is a matter of significant public concern. The product is created with the intention it will be sold to consumers, and Royal Packaging put it into a distribution chain knowing that consumers throughout Michigan would be purchasing these products.
- 8. As a result of this testing, the Department of Agriculture and Rural Development issued a State-wide Stop Use and Stop Removal Order for North Atlantic brand antifreeze/coolant. (See Stop Order, Exhibit B.) These orders, which were issued on September 11, 2014, were intended to ensure removal of these products from store shelves.
- 9. Some consumers have already been harmed by distribution of Royal Packaging's misbranded products. For example, in October 2014, the Attorney General received a consumer complaint from Jesse W. of Sanilac County. Jesse's vehicle suffered a cracked radiator head after it overheated while he was using the Shur-XXX brand antifreeze/coolant. (Jesse W. complaint, Exhibit C).
- During the investigation of this matter, Royal Packaging advised the Department of Agriculture and Rural Development that it sold the North Atlantic and Shur-XXX brand products through two distributors: Capital Sales Co. Inc. of Hazel Park, Michigan, and City Petroleum of Dearborn, Michigan.

The Department of Agriculture and Rural Development then visited the warehouses for Capital Sales and City Petroleum. These entities were advised of the Stop Use and Stop Removal Order on the North Atlantic and Shur-XXX brand products. The Department of Agriculture and Rural Development Detained the existing inventories at these warehouse locations. Both City Petroleum and Capital Sales were asked by investigator Scott Ferguson to provide information identifying all persons and entities to which it had sold or distributed these products. Although these requests were made in August of 2014, neither City Petroleum nor Capital Sales has yet complied with these requests. (Exhibit A, ¶7).

- 11. Due to the fact it has not been able to obtain information about the distribution chain for the North Atlantic and Shur-XXX products, the Department of Agriculture and Rural Development has invested significant time and resources by having its investigators visit storefront locations throughout the State, doing spot-checks to see if the products are being held out for sale to consumers.
- 12. Despite the Stop Use and Stop Removal Order, these investigators have found the North Atlantic and Shur-XXX brand products on store shelves in dozens of locations, throughout Wayne, Oakland, Macomb, Genesee, Jackson, Livingston, Houghton, and other counties throughout Michigan. The most recent finding of North Atlantic brand antifreeze/coolant occurred at a gas station in Roseville on January 28, 2015. And, according to Inspector Ferguson, the potential for a large amount of these products to still be in the marketplace remains. (See Exhibit A, ¶9).

- The work of identifying locations selling North Atlantic and Shur-XXX 13. antifreeze/coolant has been unnecessarily slowed by the failure of City Petroleum and Capital Sales to supply the requested information about the entities to which these products were distributed. Further, the Department of Agriculture and Rural Development has identified other warehouse locations where these products appear to have been kept and distributed to businesses selling it to consumers. These locations are: Tradewell Grocery Distribution in Oak Park, D&B Grocers in Livonia, Trepco Inc. in Madison Heights, Motor Oil Distributors, Inc. in Dearborn, the H. T. Hackney Company in Wyoming, Chase Cash & Carry in Dearborn, and Universal Wholesale in Southfield, Michigan. (Exhibit A, ¶10). Subpoenas compelling these entities to provide information about the distribution chain of the North Atlantic and Shur-XXX brand products are necessary to better ensure the stores, gas stations, oil change operations and other purchasers of these products do not unwittingly continue to offer them for sale to consumers. As part of this investigative process, the Attorney General also seeks any information these entities possess identifying any consumers they are aware of who have experienced vehicle damage caused by these products.
- 14. Further, through these subpoenas the Attorney General seeks information from Royal Packaging regarding any communications it has had with consumers alleging they suffered damages because of its products, and any correspondence it has had with distributor's regarding the recall.

## RELIEF REQUESTED

Accordingly, the Attorney General respectfully requests that this Court grant this Ex Parte Petition, and enter an order authorizing issuance of subpoenas as detailed above. The proposed order with attached subpoenas are being submitted along with this Ex Parte Petition.

Respectfully submitted,

Bill Schuette Attorney General

Darrin F. Fowler (P53464) Assistant Attorney General Corporate Oversight Division P.O. Box 30755

Lansing, MI 48909

(517) 373-1160

Date: March 17, 2015

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

BILL SCHUETTE, ATTORNEY GENERAL OF THE STATE OF MICHIGAN,

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No.

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HON.

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### AFFIDAVIT OF SCOTT FERGUSON

Scott Ferguson, being first duly sworn, deposes and says as follows:

- 1. I am the Senior Field Metrologist with the Michigan Department of Agriculture and Rural Development (MDARD), Weights and Measures Program. I have worked for the program for 10 years. Weights and Measures Inspectors ensure that everything purchased on the basis of weight, measure or count is done in compliance with the Weights and Measures Act, 1964 P.A. 283. Inspectors conduct inspections and testing of commercial weighing and measuring devices in order to verify their accuracy and compliance with other legal requirements. Inspectors also have responsibility for the method of sale of commodities and ensure the net content of packaged products. In addition, the Weights and Measures Program investigates consumer complaints.
- 2. Weights and Measures became aware of Royal Packaging Company Inc. with the filing of Consumer Complaints #606229, alleging that North Atlantic and Shur-XXX Antifreeze were short measure; Consumer Complaint #607174

alleging North Atlantic and Shur-XXX Antifreeze / Coolant is short measure and misbranded (product in the container does not match labeling information); Consumer Complaint #607249, alleging North Atlantic and Shur-XXX Antifreeze / Coolant is not a gallon and is mislabeled.

The complaints resulted in MDARD Weights and Measures conducting net content verification testing as well as submitting North Atlantic and Shur-XXX brands to an independent laboratory. Product analysis was conducted for comparison to label declarations. During the investigation, Royal Packaging Company Inc. identified 2 distributors. These distributors supplied product to other distributors / retailers.

These complaints were referred to the Weights and Measures Office and I acted as the lead investigator. Inspection and testing of product was conducted in order to prove or disprove the complaints' allegations. Inspection and testing consisted of net content verification as well as product samples being submitted to an independent laboratory for analysis and comparison to the product label declarations.

- 3. The MDARD investigation of Royal Packaging was centered around the three anonymous complaints we received. In general, this is the chronology of this investigation:
  - In April and June of 2014, an informant provided samples of Shur-XXX (1) and North Atlantic (1) Antifreeze / Coolant concerned that the product did not meet the freeze point declared on the label.
  - May 30, 2014, Consumer Complaint #607174 was filed, alleging North Atlantic and Shur-XXX Antifreeze / Coolant is short measure and misbranded (product in container does not match labeling information). Samples of product were submitted to an independent laboratory for product analysis.
  - June 9, 2014 Consumer Complaint #607249 was filed, alleging North Atlantic Antifreeze and Shur-XXX Antifreeze / Coolant is not a gallon and mislabeled. Weights and Measures sampling and testing conducted of North Atlantic Antifreeze / Coolant resulting in 9 of 96 (9%) identified as being short measure and 2 of 96 (2%) MAV's (identified gross errors). Additional product was detained at seven (7) warehouses for failing to meet basic labeling requirements. Samples of the detained product were submitted to an independent laboratory for product analysis; the laboratory reported that both Shur-XXX and North Atlantic brands of antifreeze / coolant failed to meet the declared freeze point protection.

4. The product is packaged in plastic, yellow, gallon size containers with a product label applied to the front and back of the bottle. The front label indicates the product name, freeze point protection and net content; the back label indicates directions for use, ingredients and distributor information. Shur-XXX Antifreeze / Coolant is labeled as freeze protection to -34° Fahrenheit. North Atlantic Antifreeze / Coolant is labeled as freeze protection to -20° Fahrenheit.

Between the dates of April 16<sup>th</sup> and May 19<sup>th</sup>, 2014, (3) samples of Shur-XXX Antifreeze / Coolant was submitted to Savant Inc. Laboratory, 4800 James Savage Rd., Midland, MI 48642 (989) 496-2301 for product freeze point analysis. Compared to the labeled -34°F protection, Savant Inc. Laboratory reported the freeze points of the samples to be -2.56°F, -0.04°F and -0.22°F.

Between the dates of June 3<sup>rd</sup> and August 12<sup>th</sup>, 2014, (8) samples of North Atlantic Antifreeze / Coolant were submitted to Savant Inc. Laboratory of Midland, MI for product freeze point analysis. Compared to the labeled -20°F, Savant Inc. Laboratory reported freeze points of the samples to be -0.94°F, 3.38°F, 0.14°F, -0.22°F, -0.76°F, -1.12°F, -1.48°F and -0.32°F.

The product not meeting the declared labeling information does not allow Michigan consumers to make a good comparison when purchasing this type of product. Consumers may read on the label that the product provides the same protection as other, established name brand antifreeze / coolant, however, the cost of Shur-XXX and North Atlantic brands are offered at a significantly lower price. In addition to this, the product having less freeze point protection may cause permanent or costly damage to consumers' vehicles.

5. In response to Consumer Complaint #607249, MDARD Weights and Measures sampled and tested the net content of North Atlantic Antifreeze / Coolant at a distribution warehouse. Testing resulted in 9 of 96 (9%) identified as being short measure and 2 of 96 (2%) MAV's (identified unreasonable errors).

Maximum Allowable Variations or MAV's, is defined as a deficiency in the weight, measure or count an individual package beyond which the deficiency is considered to be an "unreasonable error". The number of packages with deficiencies that are greater than the MAV is controlled by the sampling procedure. The utilized sampling procedure, the definition and application of the MAV is found in NIST (National Institute of Standards and Technology) Handbook 133 Checking the Net Content of Packaged Goods. Handbook 113, Table 2-6. Maximum Allowable Variations for Packages Labeled by Liquid and Dry Volume defines the MAV for packages labeled more than 103 fl. oz. to 160 fl.oz. as 2.5 fl. oz.

Testing consisted of obtaining gross weights at a distribution warehouse. The density of the product was determined as pounds per gallon using the lightest and heaviest samples of the inspected lot. The average density of the 2 samples was then applied to the obtained gross weights of the lot. The density determination was performed by me.

In addition to the net content testing, it was discovered that the product was labeled as 120 oz. as opposed to 1 Gal. (128 fl. oz.).

- 6. On September 11, 2014, MDARD issued a statewide Stop Use and Stop Removal Order for all North Atlantic and Shur-XXX brands of antifreeze / coolant. Notice of the Order is distributed by MDARD's Public Information Office through various media outlets and trade organizations. In addition, the Stop Use and Stop Removal Order were provided to Royal Packaging Company Inc.'s attorney via email and hand delivered to the two identified primary distributors of product on the date it was issued.
- 7. On August 12, 2014, during the detainment of product at Capital Sales Company distribution warehouse, it was requested in writing, that all Bill of Ladings related to the receipt and distribution of North Atlantic antifreeze / coolant, from January 1<sup>st</sup>, 2014 be provided. Mr. Haddad, President, provided documents related to the receipt of product from Royal Packaging Company Inc. from 1/3 1/22/2014 as well as 8/7/2014. Mr. Haddad indicated that he could have the distribution records by the end of the week.

On 8/26/2014, during a follow up to Consumer Complaint #607174 at City Petroleum Inc., it was requested in writing, that all Bill of Ladings related to the receipt and distribution of the products in question, North Atlantic and Shur-XXX antifreeze / coolant, from January 1st, 2014 be provided by the close of business August 27th, 2014. Mr. Moussa Kaddough, President, provided documents related to the receipt of product from Royal Packaging Company Inc. from 1/10 - 7/15/2014. Mr. Kaddough indicated that he could have the distribution records in a few days.

To date, no distribution records have been provided from these firms.

8. During an informal office meeting on 9/3/2014 with Royal Packaging Company Inc. representatives Abass Beydoun, President/Owner, and Mr. Sam Fakih, Attorney, it was verbally requested that records for the production and distribution of North Atlantic antifreeze / coolant be provided to the Department. Mr. Beydoun indicated during the meeting that he maintains no such records and is therefore unable to provide them. However, he said Capital Sales Company Inc. and City Petroleum Inc. were his two distributors of product. It is likely that Capital Sales Company Inc. and City Petroleum Inc. are the distributors, however, failure to provide the requested information does not allow for a comparison of units

produced against units shipped / distributed. Production records would include the purchase of chemical components, labels, plastic bottles and caps.

During the informal office meeting held on 9/3/2014, Mr. Beydoun indicated that he has only been packing under the North Atlantic label and any Shur-XXX product may be old.

Also in September of 2014, Mr. Beydoun indicated that he is no longer manufacturing antifreeze / coolant and he has sold his business along with the packaging equipment to another firm.

9. In addition to issuing the statewide Stop Use and Stop Removal Order, efforts to remove product from retail shelves involve Weights and Measures staff notifying retail operators of the Order and ordering the product removed from retail shelves where found. These enforcement actions are incorporated into routine inspections and / or consumer complaint investigations either related to or unrelated to the product in question due to limited resources.

To date, nine Inspectors have issued orders to remove product at (82) individual retail locations, the majority of which are gasoline stations.

The fact is that the majority of product ordered to be removed from retail shelves is at gasoline stations. Despite the Stop Use and Stop Removal Order, these investigators have found the North Atlantic and Shur-XXX brand products on store shelves in dozens of locations, throughout Wayne, Oakland, Macomb, Genesee, Jackson, Livingston, Houghton, and other counties throughout Michigan. The most recent finding of North Atlantic brand antifreeze/coolant occurred at a gas station in Roseville on January 28, 2015. The concern is that the product was also supplied to various types of convenience stores. The distributors offer products to any type of retailer and therefore, the potential for a large amount of product to exist in the marketplace remains.

10. Additional distribution warehouse locations were identified verbally by retailers as well as reviewing invoices at sites where product was discovered. During the detainment of product at these locations, documentation related to the receipt and sale of North Atlantic and Shur-XXX Antifreeze / Coolant was requested in writing and in some cases verbally via telephone conversation (Motor Oil Distributors Inc.). The following firms provided the information noted:

Universal Wholesale Inc. 16400 West 8 Mile Rd. Southfield, MI 48075 Joseph Sevany, President

#### Note:

As requested during detainment of product on 8/12/2014, the firm provided documents related to the receipt of product from City Petroleum 12/28/2013 – 8/9/2014 as well as sales information through 8/12/2014.

Trepco West 1201 E. Lincoln Ave. Madison Heights, MI 48071 Wisam Paulus, President

#### Note:

• The firm failed to provide documentation related to the receipt of and distribution of product requested during detainment of product on 8/12/2014.

D&B Grocers Inc. 12190 Sears Dr. Livonia, MI 48150 Robert Hesano, President

#### Note:

• The firm failed to provide documentation related to the receipt of and distribution of product requested during detainment of product 8/12/2014.

Chase Cash & Carry Inc. 6661 Chase Rd. Dearborn, MI 48126 Kamal Turfah, President

#### Notes:

- Previously provided documents related to the receipt of product from City Petroleum 1/1/14-8/12/14
- The firm failed to provide documentation related to the distribution of product as requested during detainment of product on 8/12/2014.

Tradewell Grocery Distributor Sahir Gappy, President 12821 Northend Ave. Oak Park, MI 48237

#### Notes:

- Previously provided 1 document related to the receipt of product from Capital Sales Company 4/2/14
- The firm failed to provide documentation related to the distribution of product as requested during detainment of product on 8/12/2014.

The H.T. Hackney Company Bill Hillman, Manager 1180 58th Street S.W. Wyoming, MI 49509

#### Notes:

- Previously provided documents related to the receipt and return of product (251 cases, 1506 units) to D&B Grocers Inc., 7/14/14.
- No documentation related to the distribution of product was provided.

Motor Oil Distributors Inc. Hassan Mahmoud, President 728 Centralia Dearborn Heights, 48127

#### Note:

- The firm failed to provide documentation related to the receipt of and distribution of product requested via telephone conversation on 12/3/2014.
- 12. I have personal knowledge of the facts contained in this affidavit and if called as a witness I can testify competently to these facts.

FURTHER, AFFIANT SAYTH NOT.

Scott Ferguson

Subscribed and sworn to before me this <u>36</u> day of <u>FEB</u>., 2015.

DEBRA CHERESKO, Notary Public LIVINGSTON County, Michigan

Commission Expires: 2-25-2018

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RICK SNYDER

# STATE OF MICHIGAN DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT

JAMIE CLOVER ADAMS DIRECTOR

### STOP-USE AND STOP-REMOVAL ORDER

Issued September 11, 2014

In accordance with the authority granted to the Director of the Michigan Department of Agriculture and Rural Development (MDARD) by the Michigan Weights and Measures Act, 1964 PA 283, as amended, MCL 290.601 *et seq.* MDARD is issuing a Stop-Use and Stop-Removal Order for the following Antifreeze/Coolants produced by Royal Packaging, Inc., of Detroit, Michigan prior to September 11, 2014.

North Atlantic Antifreeze/Coolant Shur-XXX Antifreeze/Coolant

- A. The Michigan Legislature has tasked MDARD with authority to enforce the Weights and Measures Act.
- B. The Weights and Measures Act provides that the Director of MDARD may inspect commodities offered or exposed for sale to determine whether they are offered or exposed for sale in accordance with the law. MCL 290.612.
- C. The Weights and Measures Act further provides that the Director of MDARD may order the discontinuation of sale of packages or commodities that are found to be offered for sale in violation of the law. MCL 290.612.
- D. The Director of MDARD is also granted authority to issue stop-use and stop-removal orders with respect to packages or amounts of commodities offered or exposed for sale. MCL 290.613.
- E. Laboratory tests of antifreeze/coolant manufactured, packaged, and/or distributed by Royal Packaging, Inc., has consistently demonstrated that the product does not meet the labeled freeze point. As such, the packaging of these products is misleading and does not conform to the packaging requirements in section 3.1 of the Uniform Packaging and Labeling Regulation contained in the National Institute of Standards and Technology (NIST) Handbook 130 and adopted by MCL 290.628c(2). Use of these products may damage vehicles and engines.

MDARD has determined that antifreeze/coolant manufactured, packaged, and/or distributed by Royal Packaging, Inc., under the North Atlantic and Shur-XXX brand names, do not meet the quality standards advertised on the label. Pursuant to the authority granted to the Director of MDARD in sections 290.612 and 290.613 of the Weights and Measures Act, I am issuing a Stop-Use and Stop-Removal order prohibiting the sale, offering for sale, or use of North Atlantic and Shur-XXX brand antifreeze/coolants manufactured, packaged and/or distributed by Royal Packaging, Inc. prior to September 11, 2014. These products should no longer be used, immediately be removed from store shelves or other product displays, and no longer offered for sale.

Jamie Clover Adams, Director

Michigan Department of Agriculture and Rural Development

Date: 9/11/14

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# Michigan Office Of Attorney General Environmental Incident Report **Form**

Web Complaint Number: 2014-ep10151548122-A Submitted: 10/15/2014 3:48:26 PM

#### **Complainant Information**

[False] Check if you prefer to submit this complaint anonymously

Your Last Name: W First Name: Jesse Your Street Address: City: Brown City

Your State: MI Zip Code: 48416

Your County: Sanilac

Your Home Phone: Your Work Phone:

Fax Number: E-mail Address:

#### Information On Company Or Person Your Complaint Is About

Company or Person? Company

Complainee Last Name:

Company Name: Royal Packing Inc

Street Address:

State: Mi

County: Fax Number:

Web Site Address:

Complainee First Name:

City: Detroit

M.I.; D

Ext.:

True

Zip Code: Phone:

E-mail Address:

#### **Incident Information**

Incident Date\Time: 1/17/2014 3:00:00 PM

Incident Location; 123 E Lapeer st

City or Township: Peck County: Sanilac Zip Code: 48466

Lake/Stream:

#### Other Information

Is a court action pending?

False False

Do you have an attorney representing you on this matter?

Are you willing to testify in court regarding this complaint?

False If so, who?

Did you complain directly to the business? What was the response from the business?

If no complaint was given to the business directly, why?

Was this complaint filed with any other agencies? False If so, who?

#### Incident Detail

I used shurxxx antifreeze a total of three gallons and on this date it over heated and threw the litter which in turn cracked the head. Had it towed home and mechanic-rick hayworth-gave me the good news. At that time I was not aware of the problem with the product and it has been parked in our garage since that day. I am hoping something can be done to fix this vehicle . Thank you for your time

[False] Check if this referral is just to give us information and you do not need us to respond to you directly.

[False] Check if you want to send documentation, After you submit this form you will be provided with a postal mail address, and facsimile number, to which you may send documents.

[False] Check if you want to sign up for the Consumer Protection Listserv.

[False] Check if you want to sign up for the AG Press Release Listserv.

[False] Check if you want to sign up for the Attorney General Opinions Listserv.

- (\*) I certify that the information on this form is true and accurate to the best of my knowledge.
- (\*) I consent to releasing to the Michigan Attorney General any information or document relative to the investigation of this complaint. By checking this box, I also certify that I have had the opportunity to review the Michigan Attorney General Privacy Policy before submitting this complaint.