EXHIBIT A

Penny Pinchers Discount Groceries and Close-Outs
Like This Page · April 6

MEDICAL MASK
N95
99% BACTERIAL FILTRATION
$3.00 each
LIMITED AMOUNT

15 37 Comments 22 Shares

Like Comment Share

Most Relevant

Janice [redacted] What location?
Like · Reply · 3d

View 5 more replies

Author
Penny Pinchers Discount Groceries and Close-Outs LeAnna [redacted]yes both stores
Like · Reply · 2d

Most Relevant is selected, so some replies may have been filtered out.

Emilee [redacted] They shouldbe donated to the hospitals. Shame people are going to try and take advantage at a time like this. When people are dieing and need these mask. What if one if loved ones were in the hospital. Or someone you know had to work in a hospital with nothing to protect them.
Like · Reply · 3d 1

View 4 more replies

Author
Penny Pinchers Discount Groceries and Close-Outs Jamie [redacted]thank you

Write a comment...

EXHIBIT B

Moua, Andrea (AG)

From: [redacted]
Sent: Wednesday, April 8, 2020 11:52 AM
To: Email, CP
Subject: Business price gouging

Attached are pictures of face masks being sold by Penny Pinchers in Battle Creek, Michigan. They're charging $30.00 for a package of 10 masks. I understand normally these masks sell for 58 cents a piece. Thank you for your consideration.

[redacted]

Sent from my Verizon, Samsung Galaxy smartphone

EXHIBIT C

Understanding the Difference

	 Surgical Mask	 N95 Respirator
Testing and Approval	Cleared by the U.S. Food and Drug Administration (**FDA**)	Evaluated, tested, and approved by **NIOSH** as per the requirements in 42 CFR Part 84
Intended Use and Purpose	Fluid resistant and provides the wearer protection against large droplets, splashes, or sprays of bodily or other hazardous fluids. Protects the patient from the wearer's respiratory emissions.	Reduces wearer's exposure to particles including small particle aerosols and large droplets (**only non-oil aerosols**).
Face Seal Fit	Loose-fitting	Tight-fitting
Fit Testing Requirement	No	Yes
User Seal Check Requirement	No	Yes. Required each time the respirator is donned (put on)
Filtration	Does NOT provide the wearer with a reliable level of protection from inhaling smaller airborne particles and is not considered respiratory protection	Filters out at least 95% of airborne particles including large and small particles
Leakage	Leakage occurs around the edge of the mask when user inhales	When properly fitted and donned, minimal leakage occurs around edges of the respirator when user inhales
Use Limitations	Disposable. Discard after each patient encounter.	Ideally should be discarded after each patient encounter and after aerosol-generating procedures. It should also be discarded when it becomes damaged or deformed; no longer forms an effective seal to the face; becomes wet or visibly dirty; breathing becomes difficult; or if it becomes contaminated with blood, respiratory or nasal secretions, or other bodily fluids from patients.

Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health

EXHIBIT D

Invo

Kooz Concepts International Inc.

1740 44th Street SW #106
Grand Rapids, MI 49519
[redacted]

Date	Invoice N
04/06/20	204

Bill To:
Penny Pinchers 199 N 20Th St Battle Creek, MI 49037

Ship To
Penny Pinchers 199 N 20Th St Battle Creek, MI 49037

P.O. Number	Terms	Due Date	Contract #
	Due on receipt	04/06/20	

Item	Description	Est Amt	Prior %	Quantity	Rate	Curr %	Amount
FaceMask				1,000	1.20		1,200.00
Shipping	Shipping				16.00		16.00

☑ Track your expenses...
☐ Clothing ☐ Food ☐ Transportation
☐ Credit Card ☐ Utilities ☐ Mortgage
☐ Entertainment ☐ Insurance ☐ Other: _____

☐ TAX-DEDUCTIBLE ITEM

[redacted]

4-7-20

Kooz
thousand two hundred

1000 face mask

BALANCE FORWARD
THIS ITEM 1200
BALANCE
DEPOSIT
OTHER
BALANCE FORWARD

[redacted]

For added security, your name and account number do not appear on this copy.

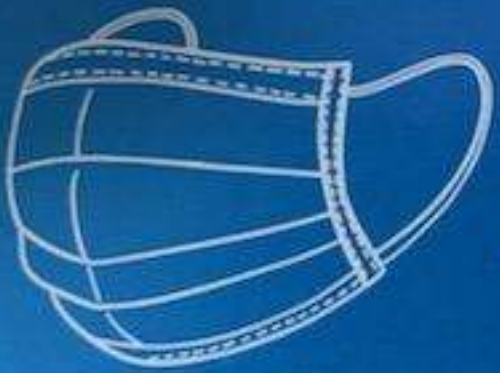
NOT NEGOTIABLE

Thank you for your business

Total $1,216.0

EXHIBIT E

Medical Protection
N95 Filter layer, professional and medical



Disposable me

■ Ear type
17.5cm × 9.2cm, 3 layers

50 In

EXHIBIT F

DEPARTMENT OF ATTORNEY GENERAL FINANCIAL CRIMES DIVISION

ORIGINAL DATE	ATTY GEN LEGAL FILES NUMBER
April 10, 2020	
DATE OF THIS REPORT	**LANSING – CORPORATE OVERSIGHT**
April 15, 2020	

SPECIAL AGENT NAME	AAG ASSIGNED	COMPLAINANT
Jeff Campbell	Darrin Fowler	Karen [redacted]
STREET ADDRESS AND CITY OF INVESTIGATOR OFFICE		**REPORT NUMBER AND CASE STATUS**
525 W. Ottawa St., Lansing, MI 48933 [redacted]		#1 – Initial - Open

Report Type:
Initial

Complaint/Nature of Incident:
Sale of possible counterfeit N-95 face mask

Venue:
Battle Creek, MI

Complainant:
Karen [redacted]

Suspect:

1. James Ziebell – JimmyZ Penny Pinchers, LLC
   1255 E. Columbia Ave
   Battle Creek, MI 49014
   [redacted]
   [redacted]

2. Kraig Koeze – Kooz Concepts International, Inc.
   1740 44th St. SW Ste #106
   Grand Rapids, MI 49509
   [redacted]

Information:
On 4/10/2020, I was assigned to investigate a complaint of price gouging for face masks being sold by a store called Penny Pinchers in Battle Creek, MI. This complaint was emailed to the Attorney General Consumer Protection Division, and included photos of the face masks in question. A copy of that complaint is included with this file. The complainant reported seeing packages of 10 masks on sale for $30.00. I also looked up the Penny Pinchers Facebook page, and saw that they were advertising "medical masks" for sale at a price of $3 per mask. Screenshots of the Facebook advertisements are included, labeled as "Penny Pinchers Facebook screenshot #1 through #3."

I called Penny Pinchers on 4/10/2020 at approximately 3:35pm. Without identifying myself, I asked if they still had masks in stock, and if they were N-95 masks. The male who answered the phone told me he did have masks on sale, and still had some. He told me they were N-95 masks,

and said they were the paper version with a 3-layer filter. This call was recorded, and a copy of that recording is included with this file, labeled as "Penny Pinchers pre-text call."

I called Penny Pinchers back on 4/10/2020 at 3:59pm. I identified myself and informed the man who answered the phone of the complaint received by the Attorney General. He identified himself as the store owner, James Ziebell. I asked him what he could tell me about the masks, and he told me they are 3-layer system with filtration, N-95 filtration system. I asked him what brand they are, and he advised they are a generic brand. He went on to tell me he called Emmet Township about the masks before he bought them or put them out for sale and was told they seemed reasonably priced. He advised he paid around $2 per mask and was selling them for $3 each. I asked him where he obtained the masks, and he told me a gentleman in Grand Rapids had them, and his son had gone to pick them up. I asked him for a copy of his purchase invoice, and photos of the masks, and he agreed to provide that information. He told me he bought 1,000 masks and had approximately 300 to 400 masks left in the store. This call was also recorded, and a copy is included with this complaint file labeled as "1st Call with James Ziebell."

I received 7 photos from Mr. Ziebell via text message on 4/10/2020 at 5:14pm. These photos included images of two different people each wearing a blue paper style face mask. Also included were photos of the mask and packaging, including a box the masks in question presumably had been packaged in. The images of the box showed writing that appeared to be Chinese, and a description of the product that said "Medical Protection, N95 filter layer, professional and medical, disposable medical mask." After reviewing these photos and the packaging, it is my belief that these masks most likely do not meet NIOSH standards to be approved N-95 masks, even though they are labeled as such. These photos are included with this file, and the files are labeled as "Ziebell photos 4-10-2020 #1 through 7."

After receiving these photos, I called Mr. Ziebell back to confirm I received them, and asked him if he was willing to temporarily hold off on selling remaining masks. He told me he had already promised to sell masks to a convalescent home that was on their way to pick them up for their staff. He agreed to hold off on selling any more other than what he had promised to sell already. This call was also recorded and is included with this file, labeled as "2nd call with Ziebell."

I received a photo from Mr. Zeibell via text message on Sunday 4/12/2020 showing a copy of an invoice dated 4/6/2020 from Kooz Concepts International, Inc. showing a sale of 1,000 face masks at a price of $1.20 per mask for a total of $1216.00 including shipping. This photo also showed a carbon copy of a check dated 4/7/2020, written to Kooz for $1,200 for 1000 face masks. This photo is included with this complaint file and is labeled as "Invoice for face masks."

I called Kooz Concepts International on 4/13/2020 at 1:46pm, and spoke with Kraig Koeze, the owner of Kooz Concepts International. I identified myself and informed him of the complaint I was investigating. This call was recorded and is included with this file labeled as "Kraig Koeze

call 4-13-2020." In summary, over the course of my conversation with him, Mr. Koeze provided me with information about why he began purchasing masks, where he obtained them, and his knowledge of the certifications validating these masks. I asked for documentation showing where these masks came from and the specifications of these masks.

On 4/14/2020, I had not received any further information from Mr. Koeze as requested, so I called him again at 4:00pm. This call was recorded as well and is labeled as "Koeze call 4-14" in the complaint file. In summary, Mr. Koeze told me he had been busy and had not been able to get the requested information for me. During this call, I advised Mr. Koeze that I would email him a copy of an Attorney General press release about another company that would help explain the concerns of the Attorney General with these types of masks.

I received 5 photos from Mr. Koeze via text message on 4/14/2020 at 4:20pm, showing documents he advised represented the information he had in his possession about the certifications of the masks. These files are labeled as "Kooz photo #1 thru #6."

On 4-14-2020 as I had told him, I sent Mr. Koeze an email requesting specific information related to the purchase and subsequent sales of his masks. A copy of that email, and Mr. Koez's response is included with this file, labeled as "Koeze email and response 4-14-2020."

Further information will be added as it becomes available in future supplemental reports. Based on the information obtained so far, I will forward these findings to the Corporate Oversight Division for review.

Status:
Open

EXHIBIT G

MONLKA

CERTIFICATE

Reference No.: MNK1603030271R

This certifies that

SILVER DRAGON INDUSTRIAL LIMITED

NO.28, HUACUIERXIANG, LIANHU ROAD, QIAOTOU TOWN, 523520, DONGGUAN, GUANGDONG, CHINA

Has completed the FDA Establishment Registration (as manufacturer and foreign exporter)

And Device Listing with the US Food & Drug Administration, through

SILVER DRAGON INDUSTRIAL LIMITED

Sample Name

SILVER DRAGON INDUSTRIAL LIMITED Will confirm that such registration remains effective upon request and presentation of this certificate until the calendar year stated above, unless said registration is terminated after issuance of this certificate. SILVER DRAGON INDUSTRIAL LIMITED Makes no other representations or warranties, nor does this certificate make any representations or warranties to any person or entity other than the named certificate holder, for whose sole benefit it is issued. This certificate does not denote endorsement or approval of the certificate-holders device or establishment by the U.S. Food and Drug Administration. SILVER DRAGON INDUSTRIAL LIMITED assumes no liability to entity in connection with the foregoing.

Pursuant to USP51AND USP61 "Registration of a device establishment or assignment of a registration number does not in any way denote approval of the establishment or its products. Any representation that creates an impression of official approval because of registration or possession of a registration number is misleading and constitutes misbranding." The U.S. Food and Drug Administration does not issue a certificate of registration, nor does the U.S. Food and Drug Administration recognize a certificate of registration, SILVER DRAGON INDUSTRIAL LIMITED

Is not affiliated with the U.S. Food and Drug Administration.

FDA

Shenzhen MONLKA Technology Co.,Ltd. * TESTING *

David Lee

Manager

April 24, 2016

Shenzhen MONLKA Technology Co.,Ltd.

44 district, Baoping 1st Industrial Park, Shenzhen,Guangdong,China. (518000)

Tel: [redacted]

http://www.monlka.com/

Verification of CE Registration

Certificate No.: CE20200309

This is to certify that during the examination of the Technical Documentation provided by the manufacturer:

Manufacturer: HEFEI [illegible] L PHARMACEUTICAL CO.,LTD
[illegible] nt Zone,231600, Feidong County, Hefei,,China

EC-Representative: Luxus Lebenswelt GmbH
Kochstr.1, 47877, Willich, Germany

On its product as follows:

Product name: Disposable medical mask, medical surgical mask, medical protective mask，Face Mask，disposable face mask

Classification: Class I.

No Non-compliance according to the requirements of the Medical Device Regulation (EU) 2017/745 Annex II and Annex III was detected, and the aforementioned device complies with the Regulation including all General Safety and Performance Requirements defined in Annex I.

The manufacturer has provided the EU Declaration of Conformity according to the Medical Device Regulation (EU) 2017/745 - article 19 requirements, confirming that this medical device, as stipulated above, is fulfilling the applicable requirements of the Medical Device Regulation (EU) 2017/745.

The notification of aforementioned device has been completed by the European Representative in Germany. The German Competent Authority is notified of the manufacturer's medical devices and has allocated registration.

Issue Date:Mar.09,2020
Date of expiry:Mar.08,2025

Justin

SIGNATURE

CE

ABMED SERVICE INC.
Room 608, No. 738 Shangcheng Rd., Pudong Shanghai, 200120 China
E-mail:info@abmed.com.cn

purvigor

FDA登記證明 | FDA Registration | FDA登録 | La registrazione FDA

Fiscal Year 2020

CERTIFICATION OF REGISTRATION

This certifies that

GUANGDONG FEI FAN MSTAR TECHNOLOGY LTD

A1 workshop, No.10, Dongnan Xincun Avenue,zone 2,caobian No.3 Industrial Zone,Dali Town ,Nanhai District, Foshan, Guangdong, 528200, CHINA

has completed the FDA Establishment Registration and Device Listing with the US Food & Drug Administration, through

Shenzhen CTB Testing Technology Co., Ltd.

Owner/Operator Number: 10062900

Device Listing#: See annex

CTB will confirm that such registration remains effective upon receipt and presentation of the certificate until the end of the succeeding year unless sooner revoked after issuance of this certificate. CTB makes no other representations or warranties, nor does this certificate create any representations or warranties to any person or entity other than the named certificate holder for whose sole benefit it is issued. This certificate does not denote endorsement or approval of the certificate holder's device or establishment by the U.S. Food and Drug Administration. CTB assumes no liability to any person or entity in connection with the foregoing.

Pursuant to 21 CFR 807.39, "Registration of a device establishment or assignment of a registration number does not in any way denote approval of the establishment or its products. Any representation that creates an impression of official approval because of registration or possession of a registration number is misleading and constitutes misbranding." The U.S. Food and Drug Administration does not issue a certificate of registration, nor does the U.S. Food and Drug Administration recognize a certificate of registration. CTB is not affiliated with the U.S. Food and Drug Administration.

CTB FDA

Issue Date: December 11, 2020

Expiration Date: December 31, 2020

Fiscal Year 2020

CERTIFICATION OF REGISTRATION

Annex to Device Listing# for Owner/Operator Number: 10062900

Listing No.	Code	Device Name	Proprietary Names	Activities
D334598	MSH	Respirator, surgical	Mask KN95	Manufacture Foreign Exporter

END OF THE ANNEX

Issue Date: December 11, 2020

Expiration Date: December 31, 2020

CERTIFICATE ◆ ZERTIFIKAT ◆ 認證證書 ◆ CERTIFICATE ◆ ZERTIFIKAT

Fiscal Year 2020
CERTIFICATION OF REGISTRATION

This certifies that:

HUBEI KANGNING PROTECTIVE PRODUCTS CO., LTD
SPECIAL NO.1, XUEFU ROAD, XIANTAO CITY, XianTao, Hubei, 433000, CHINA
has completed the FDA Establishment Registration (as manufacturer and foreign exporter) and Device Listing with the US Food & Drug Administration, through

U.S. Agent for FDA Communications: SUNGO TECHNICAL SERVICE INC.
6050 W EASTWOOD AVE APT 201, CHICAGO, ILLINOIS 60630, USA
Telephone: +1-855-957-7779 / E-mail: sungo.group@yahoo.com

Registration Number: 3006799943
Device Listing#: See annex

SUNGO Technical Service Inc. will confirm that such registration remains effective upon request and presentation of this certificate until the end of the calendar year stated above, unless said registration is terminated after issuance of this certificate. SUNGO Technical Service Inc. makes no other representations or warranties, nor does this certificate make any representations or warranties to any person or entity other than the named certificate holder, for whose sole benefit it is issued. This certificate does not denote endorsement or approval of the certificate-holder's device or establishment by the U.S. Food and Drug Administration. SUNGO Technical Service Inc. assumes no liability to any person or entity in connection with the foregoing.

Pursuant to 21 CFR 807.39, "Registration of a device establishment or assignment of a registration number does not in any way denote approval of the establishment or its products. Any representation that creates an impression of official approval because of registration or possession of a registration number is misleading and constitutes misbranding." The U.S. Food and Drug Administration does not issue a certificate of registration, nor does the U.S. Food and Drug Administration recognize a certificate of registration, SUNGO Technical Service Inc. is not affiliated with the U.S. Food and Drug Administration.

Sungo FDA

SUNGO
Executive Director
Issued: Nov. 4 2019
Cert. No.: 2006U8306548
Expiration Date: Dec. 31 2020
CERTIFIED

SUNGO CHINA OFFICE Tel: 021-68828052 Email: [redacted] Website: www.sungoglobal.com
Add: 13th Floor, No.1500 Century Avenue, Shanghai 200122, P.R.China

Add: 13th Floor, No.1500 Century Avenue, Shanghai 200122, P.R.China

ZERTIFIKAT ◆ CERTIFICATE ◆ 認證證書 ◆ ZERTIFIKAT ◆ CERTIFICATE

Fiscal Year 2020
CERTIFICATION OF REGISTRATION

Annex to Cert. No.: 2006US306548

Listing No	Code	Device Name
D293241	FYF	CAP, SURGICAL (bouffant cap; surgical cap)
D293247	OEA	Non-surgical isolation gown (Isolation gown; lab coat; PE coat gown; coverall)
D293249	LYU	ACCESSORY, SURGICAL APPAREL (Sleeve covers; Pillow case; Face mask; Bed covers; Mob cap)
D293250	FXP	COVER, SHOE, OPERATING-ROOM (Shoe Cover)

END OF THE ANNEX

SUNGO CHINA OFFICE Tel: 021-68828052 [redacted] Website: www.sungoglobal.com
Add: 13th Floor, No.1500 Century Avenue, Shanghai 200122, P.R.China

EXHIBIT H

Campbell, Jeff (AG)

From: Kraig Koeze [redacted]
Sent: Tuesday, April 14, 2020 7:41 PM
To: Campbell, Jeff (AG)
Subject: Re: Attorney General Request for Information

Mr. Campbell
This is an investigation ? . I thought it was an inquiry.
I respectfully responded with documentation provided to me buy suppliers and explained to you that this deed was in good Faith to community as well as attempting to keep my business in operation.
This is now very concerning to my business relationships and with the timeline you are requesting more info I find unreasonable and threatening.
I may be seeking legal representation on this matter moving forward.
Respectfully
Kraig koeze

Sent from my iPhone

On Apr 14, 2020, at 5:38 PM, Campbell, Jeff (AG) [redacted] wrote:

Mr. Koeze,

As we discussed on the phone, the Attorney General has public health concerns with the masks that your company has obtained and distributed. Among those concerns is that labeling on boxes indicate these are "N95" masks. However the masks in question are clearly not N-95 grade masks, as certified by the National Institute for Occupational Safety and Health (NIOSH). As a result, my office will continue to investigate, and requests the following information to assist us with this investigation:

1. The name of the mask manufacturer and any documentation or literature provided by the manufacturer and distributors showing the mask specifications and material used for construction of the masks.
2. Copies of all purchase invoices accounting for the full inventory of masks you have purchased and sold.
3. The names and contact information for all people and/or businesses to whom you have sold these masks, along with the quantity sold, and price per mask for each sale.
4. Confirmation of the quantity of masks still in your possession at this time.

Please feel free to send any other information or documentation you feel would be helpful for our consideration in this investigation. Due to the public health concerns our office has, please provide the requested information by 5:00pm on 4/15/2020. As we discussed, I have also included a copy of a recent press release sent out by Attorney General Nessel, outlining actions being taken on a case with similar elements involving masks being sold as N-95 certified masks. This is intended only to help you understand some of the concerns the Attorney General has with these masks, and the laws that govern the sale of these masks. Thank you.

Jeffrey D. Campbell

Special Agent
Michigan Department of Attorney General
Corporate Oversight Division
P.O. Box 30736
Lansing, Michigan 48909
[redacted]

<image001.jpg>
<image002.jpg>

<AG Press Release - Masks.pdf>

EXHIBIT I

STATE OF MICHIGAN
IN THE 17th JUDICIAL CIRCUIT COURT FOR THE COUNTY OF KENT

DANA NESSEL, ATTORNEY GENERAL
OF THE STATE OF MICHIGAN,

Petitioner,

File No.: 20-10-MS

HON. MARK A. TRUSOCK

v

KOOZ CONCEPTS INTERNATIONAL, INC.,

Respondent.

Andrea Moua (P83126)
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
MouaA@michigan.gov
FowlerD1@michigan.gov

ORDER AUTHORIZING ISSUANCE OF CIVIL INVESTIGATIVE SUBPOENAS

At a session of said Court, held on
April ___, 2020, in the City of Grand Rapids, Michigan.
Present: HON. MARK A. TRUSOCK

The Attorney General has presented this Court with an *Ex Parte* Petition for Civil Investigative Subpoenas, related to an investigation of Respondent Kooz Concepts International, Incorporated. 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 the proposed subpoenas to Respondent. The subpoenas may be served through an electronic mail message to [redacted]

IT IS FURTHER ORDERED that the Respondent must comply with the Attorney General's subpoena regarding documentation related to entities Kooz Concepts International, Inc. made sales to within 24 hours of service of the subpoena.

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 through the subpoenas being issued under this Order.

IT IS SO ORDERED.

_____

Hon. Mark A. Trusock
Circuit Court Judge