

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND,)
 Plaintiff,)
v.)
SACCUCCI AUTO GROUP, INC.,)
 Subject.)
_____)

C.A. No.: NC-2023-0252

MEMORANDUM IN SUPPORT STATE PLAINTIFF’S MOTION FOR ENFORCMENT OF A CIVIL INVESTIGATIVE DEMAND

I. INTRODUCTION

The State of Rhode Island, by and through Peter F. Neronha, in his capacity as Attorney General for the State of Rhode Island (the “State”), moves the court to enter an order pursuant to Rhode Island’s Deceptive Trade Practices Act (“DTPA”), R.I. Gen. Laws § 6-13.1-7(f) requiring Subject Saccucci Auto Group, Inc. (“Saccucci”) to comply with the Attorney General’s April 14, 2023 Civil Investigative Demand (the “CID”). Specifically, the State respectfully requests that this Court enter an order requiring Saccucci to fully comply with the CID within fourteen (14) days and a monetary sanction for each day that Saccucci fails to comply after that date.

The State is investigating whether Saccucci has violated the DTPA by unfairly and deceptively (1) charging customers for a theft deterrent warranty without first obtaining their express, informed consent, (2) refusing to honor prices advertised on the dealership’s website, and/or (3) has policies or practices that resulted in discriminatory pricing. The CID at issue here requests that Saccucci produce basic transaction information about each customer who was automatically charged \$168.00 for that theft deterrent warranty.¹ Saccucci has yet to produce any responsive information in response to this CID and Saccucci has not served any formal objection. Prior to issuing the CID, counsel for the State

¹ A copy of the CID is attached hereto as Exhibit A.

worked with Saccucci to tailor these requests to focus on information that could be produced with minimal burden or business disruption through Saccucci's automated systems. Additionally, the State has attempted in good faith to secure compliance with the CID; for example, the State asked whether Saccucci could propose a compromise to resolve the parties' dispute four weeks ago. They have yet to respond with a proposal. Because Saccucci has failed to cooperate, the State now requires the Court to intervene.

II. PARTIES AND JURISDICTION

Plaintiff Peter F. Neronha is the Attorney General of the State of Rhode Island. The Attorney General is the State of Rhode Island's chief law enforcement officer and is authorized to issue Civil Investigative Demands to investigate potential violations of the Deceptive Trade Practices Act by R.I. Gen. Laws § 6-13.1-7.

Saccucci Auto Group, Inc. d/b/a Saccucci Honda is a Rhode Island corporation with a principal office address of 1350 West Main Road in Middletown, RI where it operates a motor vehicle dealership.²

Subject matter jurisdiction over this matter is properly conferred in this Court pursuant to R.I. Gen. Laws § 6-13.1-7(f). Personal jurisdiction over Saccucci in this case is properly conferred in this Court based on Saccucci's presence within the State of Rhode Island.

III. FACTS

On February 17, 2023 the State initiated an investigation into Saccucci after receiving information that indicated that the business was engaged in the practice of automatically charging customers for a \$168.00 theft deterrent product. It appeared that Saccucci added that fee to a customer's bill without first obtaining their express, informed consent. The State first received a

² Saccucci's 2023 Business Corporation Annual Report filed with the Rhode Island Secretary of State attached hereto as Exhibit B.

consumer complaint about that practice in 2019, which it brought to the attention of the business and obtained a refund for the customer.³ Since that time, the State received additional complaints from consumers alleging that Saccucci was charging more for vehicles than their advertised prices.⁴

Saccucci complied with the State's initial February 17, 2023 demand, and upon review the State issued three additional demands: two demands requesting testimony from Saccucci employees (which have yet to be successfully scheduled) and the April 14, 2023 CID that is the subject of this motion. This CID requested data about which customers were potentially illegally charged for the Theft Deterrent product and information about the price, financing, and add-on products involved in those sales. The State will rely on this information to further its investigation into Saccucci's sales and advertising practices. Prior to issuing the CID, counsel for the State conferred with Saccucci's counsel about the type of reports that the company's deal tracking software could produce and attempted to tailor the CID's single information request to ask for information that could be compiled with the click of a button. Saccucci has informally objected to the requests by email and by phone on the basis that the information sought is confidential and not sufficiently related to the Theft Deterrent issue.

IV. ANALYSIS

1. Legal Standard

Under the Deceptive Trade Practices Act ("DTPA"), the Attorney General may require that "any person who is believed to have information, documentary material, or physical evidence relevant to [an] alleged or suspected violation" of the DTPA to "produce relevant, documentary material or physical evidence for examination, at any reasonable time and place that may be stated in the investigative demand, concerning the advertisement, sale, or offering for sale of any goods or services or the conduct of any trade or commerce that is the subject matter of the investigation." R.I. Gen.

³ A redacted copy of that complaint is attached hereto as Exhibit C.

⁴ Another redacted copy of a consumer complaint regarding price advertising is attached hereto as Exhibits D.

Laws § 6-13.1-7(a). “A person upon whom a demand is served pursuant to the provisions of this section shall comply with the terms of the demand unless otherwise provided by order of court.” R.I. Gen. Laws § 6-13.1-7(e).

If the subject of a CID wishes to modify, set aside, or extend the time period to respond to the CID, they must file a petition with the superior court demonstrating “good cause” within 20 days of the CID being served. R.I. Gen. Laws § 6-13.1-7(b). Therefore, if the subject of a CID fails to petition the Court within 20 days, they must comply with the requirements of the CID unless any request for a modification or extension of time is granted by the Attorney General.

However, if the subject of a CID “fails or refuses to ... obey any subpoena or investigative demand issued by the attorney general, the attorney general may ... petition for an order of the court for the enforcement of this section, and the petition may request, and the court shall have jurisdiction to grant, after notice and a hearing, an order:

- (1) Granting injunctive relief to restrain the person from engaging in the advertising or sale of any merchandise, or the conduct of any trade or commerce, that is involved in the alleged or suspected violation;
- (2) Vacating, annulling, or suspending the corporate charter of a corporation created by or under the laws of this state or revoking or suspending the certificate of authority to do business in this state of a foreign corporation or revoking or suspending any other licenses, permits, or certificates issued pursuant to law to the person that are used to further the allegedly unlawful practice; and
- (3) Granting any other relief that may be required, until the person files the statement or report, or obeys the subpoena or investigative demand.

R.I. Gen. Laws § 6-13.1-7(f).

2. Saccucci’s compliance with the CID is plainly deficient.

Despite the State’s good faith efforts to secure cooperation, Saccucci has failed to produce any information in response to this CID and failed to timely seek a motion to modify or set aside the CID as required by R.I. Gen. Laws § 6-13.1-7(b). As discussed above, this CID requires Saccucci to provide 10 basic pieces of information about each transaction where a customer was charged for a Theft

Deterrent warranty without their express, informed consent. This information falls into four general categories: information about the customer and their vehicle, information about Saccucci's vehicle pricing, information about the add-on products and services they paid for, and information about their financing.

It is important to note that producing this information should impose no burden on Saccucci. Before the State issued this CID, it attempted to confer with Saccucci to ensure that the requested information could be produced via a routine report from Saccucci's computer systems. And after issuing the CID, counsel for the State continued to offer to alter or narrow the requests to exclude anything that could not be included in such a report.

This information is also directly relevant to the State's investigation for at least three reasons. *First*, all of the requested information relates to customers who were already the subject of a suspected DTPA violation when they were charged a fee for a warranty they did not ask for. It is a basic part of any investigation to request information about suspected victims and their purchase experience. This CID is the least-burdensome method possible to identify each potentially harmed consumer, understand their purchase of Theft Deterrent in light of the overall transaction, and to potentially identify whether they were the victim of additional unfair or deceptive trade practices. *Second*, this information will allow the State to compare Saccucci's web advertisements against the prices customers were actually charged to determine whether the dealer has engaged in a practice of advertising prices for vehicles that it did not intend to honor. *Third*, the requested data will allow the State to analyze whether Saccucci's business practices led to customers paying different prices for vehicles, products and services, or for financing based on their race or ethnicity.

Finally, it is important to note that Saccucci is already obligated to share much of the requested information with the Office of the Attorney General pursuant to the Division of Motor Vehicles Rules and Regulations. Specifically, Saccucci is obligated to maintain a system with a "complete description

of all vehicles bought and sold ...” including, but not limited to, information about the purchaser, the vehicle, and a bill of sale which must include any warranties given to or purchased by the customer. 280-RICR-30-20-1.7(D)-(E). And this information is open to inspection by the Office of the Attorney General at all times during business hours. The vast majority of information requested by the CID should already be maintained in this system; this CID allows the State to obtain this same information with minimal business disruption and expenditure of government or business resources.

3. The State’s proposed relief is appropriate.

It is indisputable that Saccucci’s failure to obey the CID is a violation of the DTPA. *See* R.I. Gen. Laws § 6-13.1-7(e) (“A person upon whom a demand is served pursuant to the provisions of this section shall comply with the terms of the demand unless otherwise provided by order of court.”). Because the State has failed to voluntarily obtain compliance with the CID, it is appropriate for the Court to issue an order applying the statutory remedies provided by the DTPA.

First, the Court should order Saccucci to fully obey the CID by producing the requested information within fourteen (14) days. In order to proceed with its investigation expeditiously, the State requires full compliance with the CID as soon as possible.

Second, the Court should prospectively order a monetary sanction for each day that Saccucci fails to fully comply with the CID following that 14-day deadline. That penalty should begin in the amount of \$10 and double each day until Saccucci comes into compliance. Such a sanction would preserve judicial resources and would further incentivize Saccucci to promptly comply with the Court’s order.

V. CONCLUSION

The Court should grant the State's Motion and, for the aforementioned reasons, the State respectfully requests that this Court enter an order pursuant to R.I. Gen. Laws § 6-13.1-7(f) requiring Saccucci to:

- (1) Produce the documents and information requested in the State's April 14, 2023 Civil Investigative Demand within fourteen (14) days;
- (2) Pay a civil penalty to the Office of the Attorney General for each day following the expiration of that fourteen (14) day period that Saccucci fails to comply with the CID beginning in the amount of \$10 and doubling each day; and

granting any other such relief as this Court deems just and proper.

Dated: July 25, 2023

STATE OF RHODE ISLAND,

PETER F. NERONHA,
ATTORNEY GENERAL,
BY HIS ATTORNEY

/s/ Stephen N. Provazza

Stephen N. Provazza (Bar #10435)
Special Assistant Attorney General
sprovazza@riag.ri.gov
150 South Main Street
Providence, RI 02903
(401) 274-4400

CERTIFICATION OF SERVICE

I, the undersigned, hereby certify that on the Twenty Fifth day of July, 2023, I filed this document electronically and it is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System. I also emailed this document to William Devereaux at WDevereaux@pdlolaw.com.

/s/ Stephen N. Provazza

OAG Exhibit A

Demand No. 2023-SAC-4

Issued to: Saccucci Auto Group, Inc.

Date Issued: April 14, 2023

**OFFICE OF THE ATTORNEY GENERAL
STATE OF RHODE ISLAND**

In the matter of:

SACCUCCI AUTO GROUP, INC.

**CIVIL INVESTIGATIVE DEMAND
FOR PRODUCTION OF
DOCUMENTS AND
INFORMATION**

THE STATE OF RHODE ISLAND TO:

SACCUCCI AUTO GROUP, INC.

CIVIL INVESTIGATIVE DEMAND

The State of Rhode Island, by and through Attorney General Peter F. Neronha, directs the subject of this investigation, Saccucci Auto Group, Inc., (hereinafter “Saccucci Honda” or “Subject”) to the provisions of this Civil Investigative Demand (“CID”), served upon them pursuant to R.I. Gen. Laws § 6-13.1-1 *et seq.*, and referred to as the “Deceptive Trade Practices Act.”

The Rhode Island Office of the Attorney General (“OAG”) has the jurisdiction and authority to issue this CID pursuant to R.I. Gen. Laws § 6-13.1-7 because, based upon information and belief, the Subject has conducted business in the State of Rhode Island and the Subject has, or is currently, in violation of R.I. Gen. Laws § 6-13.1-2, as defined by R.I. Gen. Laws § 6-13.1-1(6), because, among other things, the Subject is:

- (ix) Advertising goods or services with intent not to sell them as advertised;
- (xii) Engaging in any other conduct that similarly creates a likelihood of confusion or of misunderstanding;
- (xiii) Engaging in any act or practices that is unfair or deceptive to the consumer; and/or
- (xiv) Using any other methods, acts, or practices that mislead or deceive members of the public in a material respect.

As a basis for the issuance of this CID, the Rhode Island Office of the Attorney General’s Consumer and Economic Justice Unit has received information that the Subject may be engaged in unfair or deceptive practices related to the advertising and sale of motor vehicles.

The OAG has determined that it would be in the public interest to further investigate this issue. To that end, this CID is being served upon you pursuant to R.I. Gen. Laws § 6-13.1-7. In order to comply with the provisions of this Civil Investigative Demand, please provide the requested information according to our instructions below to Special Assistant Attorney General Stephen N. Provazza, Office of the Attorney General, 150 South Main Street, Providence, RI 02903 by April 26, 2023.

Demand No. 2023-SAC-4

Issued to: Saccucci Auto Group, Inc.

Date Issued: April 14, 2023

Please note that, pursuant to R.I. Gen. Laws § 6-13.1-7(b), a person upon whom this Civil Investigative Demand is served shall comply with the terms of the demand unless otherwise provided by order of court. Additionally, pursuant to R.I. Gen. Laws § 6-13.1-7(b), at any time before the return date specified in this investigative demand, or within twenty (20) days after the demand has been served, whichever period is shorter, a petition to extend the return date or to modify or set aside the demand, stating good cause, may be filed in the superior court in which the person served with the demand shall dwell or have his or her principal place of business, or in the superior court of Providence County.

DEFINITIONS

For this CID, the following definitions will apply:

1. “Saccucci Honda” means Saccucci Auto Group, Inc., and its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates, partnerships, captive professional corporations, limited liability companies in which any entity affiliated with Saccucci Auto Group, Inc. has an ownership interest, and joint ventures; and all directors, officers, employees, agents, and representatives of the foregoing.

2. “Communication” or “communications” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise), and shall include, but not be limited to, any conversation (whether in person or by telephonic, electronic, or other means), meeting, discussion, letter, memorandum, e-mail message, text message, website posting, note or other transfer or transmittal of information, and includes any document which refers to, reflects, abstracts, digests, transcribes, memorializes, or records any such communication.

3. “Document” or “documents” includes, without limitation, all originals and copies, duplicates, drafts, and recordings of any written, printed, graphic or otherwise recorded matter, however produced or reproduced, and all “writings,” as defined in Rhode Island Evidence Code § 1001, of any nature, whether on paper, magnetic tape, electronically recorded or stored, including film and computer memory devices; and where any such items contain any marking not appearing on the original or are altered from the original, then such items shall be considered to be separate original documents.

Any word or term that Saccucci Honda considers vague or insufficiently defined has the meaning most frequently assigned to it by Saccucci Honda in the ordinary course of business.

INSTRUCTIONS

1. Saccucci Honda is to serve a written response to each Request. For each Request, the response shall state, with respect to each item or category, that all requested information and documents have been produced, unless documents or information are being withheld, in which event the reasons for that withholding shall be stated. If, for any Request, Saccucci Honda does not have any responsive information or documents within its possession, custody or control, Saccucci Honda shall so state in its written responses to these Requests and explain why.

Demand No. 2023-SAC-4

Issued to: Saccucci Auto Group, Inc.

Date Issued: April 14, 2023

2. These Requests cover documents and information, whether or not admissible, that are in Saccucci Honda's possession, custody or control, wherever such documents are located.

3. Each item produced should bear unique identifying control numbers (e.g., Bates labels) on each item or page if the item is a document.

4. All documents must be produced in the manner in which they are kept in the usual course of business and organized and labeled to correspond with the categories in these Requests.

5. Any requested document includes any attachments, envelopes, explanatory notes or memoranda, and any other material that accompanied the document requested. If the specific document elicited a response, that response is also to be identified and produced. If the document was itself a response to a separate document, the document to which it is responding is also to be identified and produced.

6. If any document is withheld under a claim of privilege or work product protection or on any other basis, provide a detailed privilege log that identifies each document using the unique identifying numbers (e.g., Bates labels) and describes the nature and basis for Saccucci Honda's claim and the subject matter of the document withheld, in a manner sufficient to disclose the facts upon which Saccucci Honda relies in asserting Saccucci Honda's claim, and to permit the grounds and reasons for withholding the document to be identified. Such description should include, at a minimum: the date of the document, each and every author, each and every recipient, each and every person the document has been disclosed to, whether the document had any attachment, the present location of the document and all copies thereof, the subject and purpose of the document, and sufficient information to explain the claim of privilege or immunity and permit the adjudication of the propriety of that claim.

7. If Saccucci Honda contends that a portion of a document is subject to being withheld from production under a claim of privilege or immunity or that a portion of a document is nonresponsive to the requests below, produce the entire document (including all attachments) with any necessary redactions, and in their place, notations clearly indicating where the redactions were made.

8. If a document once existed, but has been lost, destroyed, or otherwise is no longer in Saccucci Honda's possession, identify the document and state the details concerning the loss or destruction of such document, including the date of the document, the title of the document, and the name and address of any person or entity that Saccucci Honda believes may be in possession of such document.

Demand No. 2023-SAC-4

Issued to: Saccucci Auto Group, Inc.

Date Issued: April 14, 2023

REQUESTS

Subject shall produce the following documents and information:

- 1) Documents sufficient to identify the following information for each transaction from January 1, 2021 to the Present where a charge for the Allstate Theft Deterrent Product Limited Warranty (described in your response to CID 2023-SAC-1) was automatically added to the Purchase Agreement and the customer paid the charge:
 - a. Customer name;
 - b. Customer home address;
 - c. Make/model/year/mileage of the vehicle;
 - d. Invoice Price (i.e. the price Saccucci Honda paid for the vehicle);
 - e. Manufacturer's Suggested Retail Price for the vehicle;
 - f. Final sale price of the vehicle, including other taxes and fees;
 - g. The total amount the customer paid for Allstate Theft Deterrent Product Limited Warranty;
 - h. Any other products and services that the customer paid for, including the amount paid;
 - i. The financing rate/APR if the purchase was financed; and
 - j. The financial institution(s) that provided that financing.

Saccucci Honda has represented to the Office of the Attorney General, through counsel, that the information requested above is readily available through the Subject's Vin Solutions and DealerTrak software. Therefore, the OAG will accept a compilation or report with the information provided by those systems in lieu of separate documents related to each transaction. The OAG reserves the right to amend this CID or issue additional civil investigative demands upon obtaining further information in its investigation into this matter.

STATE OF RHODE ISLAND,
BY ITS ATTORNEY

PETER NERONHA,
ATTORNEY GENERAL,
BY HIS ATTORNEY

/s/ Stephen N. Provazza

Stephen N. Provazza
Special Assistant Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400
SProvazza@riag.ri.gov

DATED: April 14, 2023

OAG Exhibit B



**State of Rhode Island
Office of the Secretary of State**

Fee: \$50.00

Division Of Business Services
148 W. River Street
Providence RI 02904-2615
(401) 222-3040

**Business Corporation
Annual Report**

Filing Period: February 1 - May 1

In accordance with R.I.G.L. 7-1.2-1501(e), each corporation failing or refusing to file its annual report within thirty (30) days after the time prescribed by law (R.I.G.L. 7-1.2-1501(c&d)) is subject to a penalty fee of \$25.00.

ANNUAL REPORT YEAR: 2023

1. Corporate ID No. 000007373

2. Name of Corporation Saccucci Auto Group, Inc.

3. Street Address Principal Business Office:

No. and Street: 1350 WEST MAIN ROAD

City or Town: MIDDLETOWN

State: RI

Zip: 02842

Country: USA

4. Business Phone No.

4018474737

5. State of Incorporation

State: RI

ARTICLE III

Enter the six digit NAICS Code that best describes the primary business conducted by the entity. Download the list of codes [here](#). More information on [NAICS](#) can be found online.

441110

6. Brief Description of the Character of Business Conducted in Rhode Island

AUTOMOBILE DEALER, SERVICE AND BODY SHOP

7. Names and Addresses of the Officers and Directors:

All officers and directors must be listed. If officers and/or directors have been elected, the title Incorporator is no longer applicable; please delete.

Title	Individual Name	Address
-------	-----------------	---------

	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code, Country
PRESIDENT	BARBARA SACCUCCI RADEBACH	2077 EAST MAIN ROAD PORTSMOUTH, RI 02871 USA
TREASURER	CAROL ELAINE SACCUCCI	2 HIGHLAND RD TIVERTON, RI 02878 USA
SECRETARY	BARBARA S. RADEBACH	2077 EAST MAIN ROAD PORTSMOUTH, RI 02871 USA
VICE PRESIDENT	CAROL ELAINE SACCUCCI	2 HIGHLAND RD TIVERTON, RI 02878 USA
OTHER OFFICER	CAROL E SACCUCCI	1350 WEST MAIN ROAD MIDDLETOWN, RI 02842 USA
VICE PRESIDENT	CAROL E SACCUCCI	1350 WEST MAIN ROAD MIDDLETOWN, RI 02842 USA

8. Shares Authorized and Issued

Class of Stock	Series of Stock	Par Value Per Share	Total Authorized Shares <i>Number of Shares</i>	Total Issued and Outstanding <i>Num of Shares</i>
CNP		\$0.0000	600.00	8474737

9. This report must be executed on behalf of the corporation by an authorized representative. If the corporation is in the hands of a receiver or trustee, this report must be executed on behalf of the corporation by the receiver or trustee.

Signed this 2 Day of February, 2023 at 9:16:36 AM. *This electronic signature of the individual or individuals signing this instrument constitutes the affirmation or acknowledgement of the signatory, under penalties of perjury, that this instrument is that individual's act and deed or the act and deed of the corporation, and that the facts stated herein are true, as of the date of the electronic filing, in compliance with R.I. Gen. Laws § 7-1.2.*

By CAROL E SACCUCCI
 Signature of Authorized Representative of the Corporation

Form No. 630
 Revised 09/07

OAG Exhibit C

Carol Costa

19-1063061

From: Wufoo <no-reply@wufoo.com>
Sent: Friday, October 04, 2019 12:28 PM
To: Consumers
Subject: Electronic Consumer Complaint Form [#11104]

[External email: Use caution with links and attachments]

My name is:

Address

Email

Home Phone

Number

Business you are Saccucci Honda
filing a complaint
against: *

Salesperson/Owner: salesperson:

Address of the

business:



1350 West Main Road
Middletown, RI 02842
United States

Phone number of

business:

May we send a copy Yes

of this to the

business you are

complaining

against? *

Why we provide No
your name and
telephone number
to the media in the
event of an inquiry
about this matter?

Please explain the entire circumstances surrounding your complaint below.

I purchased a 2010 Honda Accord and signed paperwork on August 12, 2019 at Saccucci Honda. My salesperson was [REDACTED] and I also spoke with a manager whose name I cannot remember, possible Matt or Mike. On the purchase agreement, there is a line labeled "accessories." I neglected to question what "accessories" meant before I signed it, but I did question what it meant as we were signing the paperwork. The manager stated it was a theft deterrent they included with all the cars, which would reimburse us if the car was ever stolen. I explained I still didn't understand exactly what it meant. I asked if it was some type of GPS device that tracks the vehicle in the event of theft. Again, he answered vaguely, saying it covers the car so in case of theft, we would be reimbursed. After several more questions, it occurred to me that perhaps it was a warranty. I asked him directly "So it's a warranty?" and he wouldn't answer. I stated I don't need an additional warranty to cover my car in case of theft, I have insurance for that. He replied "Well, you signed it now, so..." My salesperson Meghan stated she has purchased 3 cars in the years she has worked there and she had to purchase this additional warranty herself each time.

Have you Yes
complained to the
business?

What was their I understand that I signed the paperwork first, and then began questioning what the "Accessories"
response? referred to, however, when I made it clear that I didn't need their additional warranty, the manager replied "Well you signed it now, so..." and he would not remove it. There was never a discussion that the theft warranty was optional, or could be removed.

Was an oral or Yes
written warranty
given?

Did you sign any Yes
documents?

What was the date Monday, August 12, 2019
of the transaction?

Total dollar amount \$168.00

**you believe you are
owed:**

**What was the place
of the transaction?** Saccucci Honda dealership

**Witness to
transaction:**



**Was the product or
service advertised?** No

**Do you have an
attorney
representing you in
this matter?** No

**Is there any legal
action pending?** No

**List any other
consumer agencies
contacted below:** none

Your age: Under the age of 60

Military/Veteran Not applicable

**How did you hear
about us** Called AG Office

Name




OAG Exhibit D

[Home](#) > [File a Consumer Complaint](#) > [Results](#)

File a Consumer Complaint : Submission

#2848

View	 Received MAR 13 2023 Office of Attorney General ↖
HTML	
Table	
Plain text	
Data (YAML)	

The **View** page displays a submission's general information and data. [▶ Watch video](#)

Main page content

[< Previous submission](#)

[Next submission >](#)

Submission information

Your Information

My name is

PII

Address

PII

Email

PII

Home Phone Number

PII

Work Phone Number

PII

Business Information (whom you are filing a complaint against)

Business you are filing a complaint against

Saccucci Honda

Salesperson/Owner

Eve Lowrimore

Address of the business

1350 West Main Road
Middletown , Rhode Island. 02842
United States

Phone number of the business

PII

Email address of the business

{Empty}

May we send a copy of this to the business you are complaining against?

Yes

May we provide your name and telephone number to the media in the event of an inquiry about this matter?

Yes

Please explain the entire circumstances surrounding your complaint below.

Created an online deal for a Honda Civic at THEIR advertised price of \$47,845. When I began the purchase process, they now want \$59,845.

Have you complained to the business?

Yes

What was their response?

No response yet.

Was an oral or written warranty given?

No

Did you sign any documents?

No

What was the date of the transaction?

{Empty}

Total dollar amount you believe you are owed

{Empty}

What was the place of the transaction?

{Empty}

Witness to transaction

{Empty}

Was the product or service advertised?

Yes

If yes, please indicate the date and how it was advertised

I have screenshots and emails but can't attach them to this portal.

Do you have an attorney representing you in this matter?

No

Is there any legal action pending?

No

List any other consumer agencies contacted below

{Empty}

Please upload accompanying documents. Attach a file here (10mb limit)

[43032fc1-ea29-40f4-bd2b-36a7bb8ac2ad.png](#) (788.77 KB)

Statistical Information

Your age

Under the age of 60

Military/Veteran

Not applicable

How did you hear about us?

Went to AG website

Name

PII

{Empty}



Detailed cash Summary

No surprises at the dealership. Review your estimated payment details.



Your Price

\$47,845

MSRP

\$47,845

— **Taxes & Fees**  Edit

\$787

Total Taxes

\$0

DMV/Registration Fees

\$219

Documentation Fee

\$400

Theft Deterrent

\$168


Estimated Cash

\$48,632

Payment

*Estimated payment based on advertised price of \$47,845. This is not an offer or sales contract. See dealer for terms of purchase.

Close

Details		Details
	New 2023 Honda Civic Type R	Total Price \$48,632