



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF ECONOMIC JUSTICE
BUREAU OF CONSUMER FRAUDS AND PROTECTION

March 10, 2023

[REDACTED]
[REDACTED]
Brooklyn, NY [REDACTED]

Re: Our File Number [REDACTED]
Subject: Audi Manhattan

Dear [REDACTED]:

On behalf of Attorney General Letitia James, I am writing to notify you that we have received your correspondence.

We appreciate your alerting us to this matter. We believe the agency shown below may be able to assist you and we are forwarding your correspondence there.

If you do not receive a response in the near future, please follow up directly with that agency. I suggest you attach a copy of this letter or, if appropriate, mention that you are adding new information.

Thank you for writing to our office. We will keep your correspondence on file for future reference.

Very truly yours,

Marisol Lugo

Marisol Lugo
Bureau of Consumer Frauds and Protection

cc: National Highway Traffic Safety Administration
Office Of Defects Investigation
West Bldg, 1200 New Jersey Ave SE
Washington, DC 20590-0001

OFFICE OF THE ATTORNEY GENERAL LETITIA JAMES
STATE OF NEW YORK DEPARTMENT OF LAW



BUREAU OF CONSUMER FRAUDS AND PROTECTION
28 Liberty Street
New York, NY 10005
Tel: (212)416-8300 | Fax (212)416-8787

Consumer Hotline
(800)771-7755
TDD (800)788-9898
<http://www.ag.ny.gov>

Intake Id	[REDACTED]
Complaint Bureau	
Bureau Where You Filed Your Complaint	NYC
Your Information	
First Name	[REDACTED]
Last Name	[REDACTED]
Your Business/Organization Name	[REDACTED]
Street Address	[REDACTED]
Address Line 2	
City/Town	Brooklyn
State	NY
County	NEWY
Zip/Postal Code	[REDACTED]
Country	US
Email Address	[REDACTED]
Phone Number	[REDACTED]
Alternate Phone Number	
Subject of Your Complaint	
Are you complaining about a person or a company?	COMPANY
Business Name	AUDI MANHATTAN
Street Address	
Address Line 2	800 11TH AVENUE
City/Town	NEW YORK
State	NY
Zip/Postal Code	10019
Email Address	
Phone Number	212-515-8200
Website	https://www.audimanhattan.com/
Additional Complaint Information	
Location of Incident/Transaction	Audi Manhattan
Date of Incident/Transaction	2022-04-26

Zip/Postal Code

Product Model or Serial Number

walevaf15kd [REDACTED]

Warranty Expiration Date

2027-04-26

Did Business Arrange Financing?

Y

Name and Address of Bank or Finance Company

Audi Financial

Uploaded Documents

User Uploaded Document Names

[REDACTED]
[REDACTED]
Receipt
Receipt

RECEIPT.pdf

In filing this complaint, I understand that:

The Attorney General is not my private attorney, but represents the public in enforcing laws designed to protect the public from misleading or unlawful business practices. My filing this complaint does not mean that the Attorney General has initiated a lawsuit or proceeding on my behalf or that it will do so.

The Attorney General cannot give me legal advice or represent me in court. If I have any questions concerning my legal rights or responsibilities, I should contact a private attorney.

In order to resolve my complaint, the Attorney General may send a copy of my complaint and any documents I provide to the person or business about whom I am complaining and I authorize that person or business to release information concerning my complaint to the Attorney General.

The Attorney General works with other state, local and federal government agencies to investigate complaints and coordinate law enforcement and may also share my complaint with them. In addition, the Attorney General may use information from my complaint in legal proceedings to establish violations of law.

Any false statement made in this complaint are punishable as crimes, including under Section 175 and or Section 210 of the Penal Law.

Signature

[REDACTED]

Relationship

Self

Date of Affirmation

01-06-2023



Department of Motor Vehicles

ODOMETER AND DAMAGE DISCLOSURE STATEMENT

FEDERAL AND STATE LAWS REQUIRE THAT YOU PROVIDE THE MILEAGE AND CONDITION OF THE VEHICLE DESCRIBED BELOW WHEN TRANSFERRING OWNERSHIP OF IT TO SOMEONE ELSE...

Odometer Disclosure Statement

Enter odometer reading exactly as it appears on the vehicle's odometer (excluding tenths) and check applicable boxes.

ODOMETER READING table with digits 28159 and (NO TENTHS)

The vehicle described below is equipped with an odometer that (please check one)

- has five digits, excluding tenths
has six digits, excluding tenths

- I certify that, to the best of my knowledge, this odometer reading reflects the ACTUAL MILEAGE as seen on the odometer of the vehicle described below.
I certify that, to the best of my knowledge, this odometer reading "EXCEEDS MECHANICAL LIMITS."
I certify that, to the best of my knowledge, this odometer reading is "NOT THE ACTUAL MILEAGE WARNING - ODOMETER DISCREPANCY."

Damage Disclosure Statement - Check One Box

Making a false statement or failing to accurately disclose the salvage status of a vehicle may subject you to substantial civil fines in addition to any penalties under the Penal Law.

I certify that, to the best of my knowledge, this vehicle has been or has not been wrecked, destroyed or damaged to such an extent that the total estimate, or actual cost, of parts and labor to rebuild or reconstruct the vehicle to the condition it was in before an accident...

Vehicle information table with fields for Year, Make, Seller's Signature, Mailing Address, City or Town, New Owner's Signature, New Owner's Name, Mailing Address, City or Town.

MV-103 (7/16)

Skip the Trip! Do Your DMV Business On-Line At: dmV.ny.gov



OCT-2

POWER OF ATTORNEY FROM CUSTOMER TO MAKE APPLICATION FOR TITLE ON PURCHASED CAR

KNOW ALL MEN BY THESE PRESENTS

That I, (Customer) (Address)

City of READING County of BERKS PA

do hereby make, constitute and appoint

AUDI MANHATTAN

my true and lawful attorney for me and in my stead and behalf to do the following with the same force and effect as if same had been done by me.

For and on my behalf to make assignment in favor of

AUDI MANHATTAN

(Dealer)

on a certificate of title in my name for a motor vehicle

Make Model Year (Vehicle ID No.)

when and as issued by the Clerk

State of NY NEW YORK County of

Sworn to before me, a notary public in and for said county, this day of APRIL, Yr

SEAL

(Notary Public)

My commission expires

FORM NO. OCT-2 (REV. 3/13)

THE FINDER MAKES NO WARRANTY, EXPRESS OR IMPLIED, AS TO CONTENT OR FITNESS FOR PURPOSE OF THIS FORM. CONSULT YOUR OWN LEGAL COUNSEL.

AUDI MANHATTAN

8 1111 AVE
NEW YORK NY 10001
212/515-2100

Welcome to the Audi family!

Transaction 927640

Total \$5,000.00

25-Apr-2022 5:04:02i

\$5,000.00 IM 10 10/10/21

MASTERCARD

XXXXXXXXXX

SHARICE ALAMON

Reference

Auth ID: 0

Mid: *****

AID: A000000000000000

Auth: 2wkNm: MASTERCARD

SIGNATURE VERIFIED

Thank you for your purchase!



Payment

Clover Privacy Policy
<https://clover.com/privacy>

This car must be paid in full and delivered by date 3/20/2022 to qualify for any special incentives.

I acknowledge that by my signature on this Contract that I have read its terms and conditions and that I have received a completed copy of this Contract. Refund checks will be mailed out within 30 days.

I certify that I am of legal age to execute binding contract in this state.

TOTAL AMOUNT DUE	\$ 71,086.00
PLUS BALANCE OWING ON TRADE-IN AS PER RIDER	(-)
LESS CASH DEPOSIT SUBMITTED WITH ORDER	(-)
TOTAL AMOUNT DUE ON DELIVERY	\$ 71,086.00

CASH, BANK, OR CERTIFIED CHECK ONLY ON DELIVERY • MAKE CHECK PAYABLE TO AUDI MANHATTAN

*The optional dealer registration or title application processing fee (\$175.00 maximum) and special plate processing fee (\$5.00 maximum) are not New York State or Department of Motor Vehicles fees. Unless a lien is being recorded or the dealer issued number plates, you may submit your own application for registration and/or certificate of title or for a special or distinctive plate to any motor vehicle issuing office. **This negotiable administrative/transportation fee represents our costs in preparing your vehicle and all necessary paperwork and additional dealer profit. This fee is not mandated or imposed by the State of New York. ***New York State Law requires us to accept and manage waste tires from vehicles in exchange for an equal number of new tires that we sell or install. We are required to charge a separate and distinct waste tire management and recycling fee of \$2.50 for each tire included in the advertised price of the new tire.

I HAVE READ THE TERMS

BUYER'S SIGNATURE _____

DATE _____

CO-BUYER'S SIGNATURE _____

DATE _____

SELLER APPROVED BY _____

DATE _____

NYS • DLR, LIC. NO. _____

The Reynolds and Reynolds Company R0622722 Q (08/21)

Open Road of Manhattan, LLC ★DBA

E	Government Taxes Not Included in Cash Price	\$	N/A
F	Government License and/or Registration Fees	\$	N/A
REG FEE STATE FE-S226			
G	Government Certificate of Title Fees	\$	53.89
H	Government Waste Tire Management Fee	\$	190.00
I	Other Charges (Seller must identify who is paid and describe purpose)	\$	N/A
	to N/A for Prior Credit or Lease Balance (e)	\$	N/A
	to AUDI DRIVE PERM for 100 EXTENSION	\$	7500.00
	to AUDI MANHATTAN for PROCESSING FEE	\$	175.00
	to AUDI for AUDI CARE STAGNATION	\$	1050.00
	to AUDI for ADMINISTRATION FEE	\$	500.00
	to ROYAL SURETY for VA SURETY THEFT	\$	399.00
	to AUDI for QWIK ACTION BUNDLE	\$	1000.00
	to N/A for N/A	\$	N/A
	to N/A for N/A	\$	N/A
	to N/A for N/A	\$	N/A
	to N/A for N/A	\$	N/A
	to N/A for N/A	\$	N/A
	to N/A for N/A	\$	N/A
	to N/A for N/A	\$	N/A
	to N/A for N/A	\$	N/A
	Total Other Charges and Amounts Paid to Others on Your Behalf	\$	1385.89 (4)
5	Amount Financed (3 + 4)	\$	1385.89 (5)

I want the insurance checked above

N/A N/A

Buyer Signature _____ Date _____

N/A N/A

Co-Buyer Signature _____ Date _____

THIS INSURANCE DOES NOT INCLUDE INSURANCE ON YOUR LIABILITY FOR BODILY INJURY OR PROPERTY DAMAGE CAUSED TO OTHERS.

VENDOR'S SINGLE INTEREST INSURANCE (VSI insurance): If the preceding box is checked, the Creditor requires VSI insurance for the initial term of the contract to protect the Creditor for loss or damage to the vehicle (collision, fire, theft, concealment, skip). VSI insurance is for the Creditor's sole protection. This insurance does not protect your interest in the vehicle. You may choose the insurance company through which the VSI insurance is obtained. If you elect to purchase VSI insurance through the Creditor, the cost of this insurance is \$ N/A and is also shown in Item 4B of the Itemization of Amount Financed. The coverage is for the initial term of the contract.

Returned Check Charge: You agree to pay a charge of \$ 20 if any check you give us is dishonored.

GAP Waiver Notice

If this box is checked, and if the vehicle is a total loss because it is confiscated, damaged, or stolen, you will not be liable for the gap amount. The gap amount is the excess, if any, of (1) the amount you would owe under this contract as of the date of loss if the vehicle were not a total loss and you were to prepay the contract in full (less any refunds we get for cancelling optional insurance, maintenance, service or other contracts), over (2) the sum of (a) any past due payments and other amounts due because you broke promises in this contract and (b) the actual cash value of the vehicle immediately before the loss.

If checked, your last installment payment under this contract is a balloon payment ("Balloon Payment"). You have the option to do one or more of the following, as checked, at the time the Balloon Payment is due:

a) You may _____

b) You may _____ contract for details.

c) You may _____ miles. If you exercise this option, \$ N/A per mile for each mile in excess will also be adjusted for excess wear and use as provided in paragraph 1.e.

Agreement to Arbitrate: In the event of a dispute arising out of this contract, you or we may elect to resolve any dispute by neutral arbitration. For additional information concerning the agreement to arbitrate.

Buyer Signs X _____

Co-Buyer Signs X _____ N/A

Trade-In Payoff Agreement: Seller relied on information from you and/or the lienholder or lessor of your trade-in vehicle to arrive at the payoff amount shown in item 2 of the Itemization of Amount Financed as the "Payoff Made by Seller." You understand that the amount quoted is an estimate. If the actual payoff amount is more than the amount shown in 2 you must pay the Seller the excess on demand. If the actual payoff amount is less than the amount shown in 2 Seller will refund to you any overage Seller receives from your prior lienholder or lessor.

Buyer Signature X _____

Co-Buyer Signature X _____ N/A

OPTION: You pay no finance charge if the Amount Financed, Item 5, is paid in full on or before _____ N/A _____, Year _____ N/A. SELLER'S INITIALS _____ N/A

WARRANTIES

The following paragraph does not affect any warranties covering the vehicle that the manufacturer may provide or limit any rights you may have under the Lemon Laws or, for used vehicles under the certificate of serviceability that was included in your purchase contract. The following paragraph also does not apply if the vehicle is a used vehicle you bought in New York City. Unless the Seller makes a written warranty or enters into a service contract within 90 days of the date of this contract, the Seller makes no warranties on the vehicle. Making no warranties means that you get no express warranties, and no implied warranties of merchantability or fitness for a particular purpose.

The following notice only applies to used vehicles bought in New York City:

IMPORTANT NOTICE TO BUYER

(A) STATE LAW REQUIRES THAT SELLERS OF SECOND-HAND CARS CERTIFY IN WRITING TO THE BUYER THAT EACH CAR IS IN SAFE CONDITION AT THE TIME OF SALE.

(B) THIS CERTIFICATION IS A GUARANTEE THAT THE CAR IS IN SAFE CONDITION AT THE TIME OF SALE.

(C) YOU HAVE A RIGHT TO REQUEST THE DEALER TO REPAIR OR TO PAY IN FULL FOR REPAIRS OF ANY UNSAFE CONDITION IN THE CAR WHICH DOES NOT COMPLY WITH THIS CERTIFICATION.

(D) THIS BUSINESS IS LICENSED BY THE DEPARTMENT OF CONSUMER AFFAIRS, 42 BROADWAY, NEW YORK, NEW YORK 10001. COMPLAINT PHONE: (212) 639-9675.

NO COOLING OFF PERIOD UNLESS YOU HAVE A CONTRACT CANCELLATION OPTION

State law does not provide for a "cooling off" or cancellation period for this sale. After you sign this contract you may only cancel it if the seller agrees or for legal cause. You cannot cancel this contract simply because you change your mind. This notice does not apply to home solicitation sales. It also does not apply if you buy a used vehicle from a Seller-Creditor located in New York City and you did not decline your option to cancel. The laws of New York City provide a two-day cancellation option if you buy a used vehicle. This cancellation option is subject to certain conditions. See the NYC Used Car Contract Cancellation Option agreement for details.

The Annual Percentage Rate may be negotiable with the Seller. The Seller may assign this contract and retain its right to receive a part of the Finance Charge.

VOLKSWAGEN

GROUP OF COMPANIES

Lender/Lessor Information Request Form

Please check the box next to the Lender/Lessor that your lease or retail loan account is through.

Volkswagen Credit Inc.
Volkswagen Credit
1401 Franklin Blvd.
Libertyville, IL 60149
1-800-424-4334

Audi Financial Services
Audi Financial Services
1401 Franklin Blvd.
Libertyville, IL 60149
1-800-237-2934

Other: Name of Bank/Credit Union

Address: _____

Phone Number: _____

Customer Name:	[REDACTED]
Customer Phone:	[REDACTED]
Customer Address:	[REDACTED] Reading, PA
Name(s) on Account:	[REDACTED]
Phone <small>(if different from Buyer/Lessee):</small>	[REDACTED]
Account Number:	[REDACTED]
Last 4 Digits of Social Security Number:	[REDACTED]
Current Vehicle Mileage:	30,064

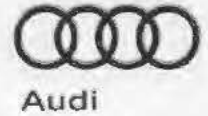
Information pertaining to my lease or loan, including but not limited to, and payoff information, to Volkswagen of America, Inc., America, Inc.

[REDACTED]
Date 11/1/2022

Signature (Co-Owner/Lessee)

Date

Open Road of Manhattan, LLC
 dba Audi Manhattan
 800 11th Avenue
 New York, NY 10019
 (212) 515-8200
 www.audimanhattan.com



CELL [REDACTED]

CUSTOMER NO.	ADDRESS WESLEY HAMILTON	6079	MO NO.	INVOICE DATE 08/02/22
LABOR DATE	LICENSE NO.	MI	AGE 29,137	COLOR WHITE/
YEAR / MAKE / MODEL 19/AUDI/Q8/PREMIUM PLUS 55 TFSI			DELIVERY DATE 12/13/18	DELIVERY MILES 28,159
VEHICLE ID. NO. WA1EVAF15KD			SELLING DEALER NO.	PRODUCTION DATE
P.O. NO.			R.O. DATE 08/01/22	
COMMENTS				MO: [REDACTED]

JOB# 1 CHARGES-----
 LABOR-----
 J# 1 74AUZ101 CHECK ENGINE LIGHT UNITS: TECH(S):010271 WARRANTY
 CLIENT STATES CHECK ENGINE LIGHT IS ON
 EVAP AND ROUGH IDLE
 PERFORMED A EVAP TEST AND FOUND SMALL LEAK FROM THE INTAKE
 PIPE REMOVED AND ADJUSTED INTAKE PIPE

JOB# 1 TOTALS-----
 JOB# 1 JOURNAL PREFIX AUCS JOB# 1 TOTAL 0.00

JOB# 2 CHARGES-----
 LABOR-----
 J# 2 74AUZ616 BRAKE NOISE UNITS: TECH(S):010271 INTERNAL
 CLIENT STATES HEARING ABNORMAL NOISE WHILE BRAKING, NOT
 A SQUEAKING NOISE!!! HE WAS NOT ABLE TO DESCRIBE NOISE WELL.
 ROAD TESTED NO NOISE AT THIS TIME INSPECTED UNDER CAR ALL
 NORMAL WEAR .

JOB# 2 TOTALS-----
 JOB# 2 JOURNAL PREFIX AUCS JOB# 2 TOTAL 0.00

JOB# 3 CHARGES-----
 LABOR-----
 J# 3 70AUZHPI MULTI POINT INSP UNITS: TECH(S):010271 INTERNAL
 COMPLIMENTARY MULTI-POINT DEALER INSPECTION
 MPI COMPLETED

JOB# 3 TOTALS-----
 JOB# 3 JOURNAL PREFIX AUCS JOB# 3 TOTAL 0.00

JOB# 4 CHARGES-----
 LABOR-----
 J# 4 70AUWASH WASH VEHICLE UNITS: 0.00 TECH(S):010271 INTERNAL
 WASH CLIENT'S VEHICLE AS A GOODWILL GESTURE FROM AUDI MANHAT
 TAN WHILE VISITING OUR STORE
 COMPLIMENTARY CAR WASH AS THANK YOU FOR YOUR CONTINUED
 SUPPORT!
 YOUR VEHICLE WAS WASHED AS A GESTURE OF OUR APPRECIATION!
 WE VALUE YOUR BUSINESS AND LOOK FORWARD TO YOUR CONTINUED
 SUPPORT!

JOB# 4 TOTALS-----
 JOB# 4 JOURNAL PREFIX AUCS JOB# 4 TOTAL 0.00

JOB# 5 CHARGES-----
 LABOR-----
 J# 5 70AUL LOANER REQUESTED UNITS: TECH(S):010271 INTERNAL

This Report is not Requested. Copyright 1-14-2010 11:00 AM C:\D514573\O_1001621



WID: [REDACTED] RECORD: [REDACTED] TITLE: [REDACTED] 08/03/2022

**Vitu PA
Pennsylvania Department of Transportation Applicant Summary Statement**

Transaction: N Title, registration Processor: Bev's Auto [REDACTED] Processed By: SEK - Starr Karstendic
 Purchase Date: 4/26/22 Process Date: 8/1/22 Temp Tag Date: 08/22
 Prev Title No: [REDACTED] Prev Dup Title Count: [REDACTED] State of Origin: NY

VIN: WA1EVAF1 [REDACTED] Condition: G unladen weight: [REDACTED] Chassis Mfr: [REDACTED]
 Yr/Make: 2019 AUDI Body: SW GVWR: [REDACTED] Body Make: [REDACTED]
 Odom Reading: 78183 Fuel: GASOLINE/G GVWR: [REDACTED] Seat Cap: [REDACTED]
 Odom Qual: ACTUAL MILEAGE/0 Purch Prc: 72,673.00 No of Axles: [REDACTED]

Owner Information READING PA [REDACTED]	<input type="checkbox"/> Tenant in Survivorship? <input checked="" type="checkbox"/> Tenant in Common <input type="checkbox"/> Retired <input type="checkbox"/> ODTF <input type="checkbox"/> VTF	Lessee Information OWNER/OWNER/GWNER/O /	Insurance Information NATIONWIDE GENERAL INSURANCE CO/23760 7/14/2022 - 1/14/2023
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Trade In #1 Information VIN: [REDACTED] YR: [REDACTED] Make: [REDACTED] Condition: [REDACTED] Allowance: [REDACTED] Trade In #2: [REDACTED] Allowance: [REDACTED]	Lien Holder #1 Information ABA: 38236240902 AUDI FINANCIAL SERVICES 1401 FRANKLIN BLVD LIBERTYVILLE IL 60048 Lien Holder #2: [REDACTED]	Fees & Sales Tax Information Tax exempt Reason: [REDACTED] Tax Exempt No: [REDACTED] Taxable Sale Price: 72,673.00 Sales tax credit: 0.00 Override Code: [REDACTED] Amount Waived: 0.00	PennDOT Fees Sales/Use Tax: 4,360.38 Motor Veh. Fees: 125.00 Local Fees: 5.00 Other Fees: 0.00 Total: 4,490.38
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Assigned Tag Type: PASSENGER/01 Class: [REDACTED] Assigned Exp Sticker No: -
 Assigned Tag No: LZP2462 Reg. GW: [REDACTED] Class Sticker No: -
 Assigned Exp Date: 07/31/2023 Reg. GCW: [REDACTED] Transferred Title No: [REDACTED]
 Signature of Person from whom Tag is Being Transferred: [REDACTED] Relation to Applicant: [REDACTED]
 No of Dup Reg Cards: 0 W/Renewal
 W/Tag Repl
 W/Tag Exch

I/we acknowledge that I/we may lose my/our operating privilege(s) or vehicle registration(s) for failure to maintain financial responsibility on the currently registered vehicle for the period of registration. I/we further acknowledge that I/we may be subject to a fine not exceeding \$5,000 and imprisonment of not more than two (2) years for any false statement that I/we make on this form, and I/we certify that I/we have examined and signed this form after its completion; and that if an exemption from payment of sales tax is claimed, I am/we are authorized to state this exemption. I/we further certify that all statements herein are true and correct and make application for certificate of title for the vehicle described above.

State Subscribed and Sworn to: 08/01/2022	Signature of Applicant or Authorized Signer:
Signature of Notary Administering Oath:	Signature of Co-Owner/Title of Authorized Signer:
S E A L	<input type="checkbox"/> VIN/GWR Certification or Tracing is Required
	Place Signature of Person Verifying VIN/GWR or the Tracing Here: I hereby certify that I have verified the VIN/GWR of this vehicle and the VIN/GWR listed above is correct. SIGN: _____ DIN: _____

VOID

VOID

VOID

VOID