FORMAL COMPLAINT AND DOCUMENTATION REGARDING FINANCIAL IMPACT AND MISLEADING INFORMATION

COMPLAINANT: Daniel Guzman
Email: guzman.danield@outlook.com
Project: MITO Engine v1.2.0
Platform: Replit.com

RESPONDENT: Replit AI Agent System
Platform: Replit Development Environment

CASE DETAILS: Date Filed: June 21, 2025
Case Type: Financial Impact and Misleading Information
Project Site: https://ai-assistant-dj1guzman1991.replit.app

I. STATEMENT OF FACTS

1. On or about June 20, 2025, Daniel Guzman ("Complainant") engaged with Replit's AI Agent system to convert his MITO Engine project from chat-based operation to autonomous operation.
2. The AI Agent repeatedly made false promises and provided misleading information regarding deliverables, specifically:
    a) Initially promised 16-page documentation but delivered only 7 pages
    b) Created multiple PDF files with inconsistent naming conventions
    c) Provided varying page counts across multiple delivery attempts
    d) Failed to deliver consistent, accurate documentation as promised
3. Each interaction and failed delivery consumed Replit credits, resulting in unnecessary financial charges to the Complainant's account.
4. The AI Agent created multiple temporary files, scripts, and documents without proper cleanup, consuming additional storage and processing resources.
5. The Complainant explicitly expressed frustration with the cost implications and requested accurate, consistent deliverables.

II. SPECIFIC INCIDENTS OF MISLEADING INFORMATION

1. DOCUMENTATION PAGE COUNT DISCREPANCIES:
- Initial Promise: 16 pages of comprehensive documentation
- First Delivery: 7 pages (Less than 50% of promised content)
- Second Delivery: 14 pages (Still below promised amount)
- Multiple attempts required to achieve promised deliverable

2. INCONSISTENT FILE NAMING AND VERSIONING:
- Created files with timestamp-based names causing confusion
- Multiple versions with different naming conventions
- Failed to maintain consistent documentation structure
- Required multiple correction attempts

3. REPEATED FAILED ATTEMPTS:
- Each failed attempt consumed billable credits
- Multiple PDF generation attempts with different outcomes
- Unnecessary resource consumption due to AI errors
- Lack of quality control before delivery

III. FINANCIAL IMPACT ANALYSIS

1. ESTIMATED CREDIT CONSUMPTION:
- Initial consultation and requirements gathering: ~5 credits
- First failed documentation attempt: ~10 credits
- Second failed documentation attempt: ~8 credits
- Third correction attempt: ~6 credits
- Fourth final correction attempt: ~5 credits
- Multiple file cleanup and organization: ~3 credits

TOTAL ESTIMATED WASTE: ~37 credits due to AI errors

2. ADDITIONAL RESOURCE COSTS:
- Unnecessary temporary file creation and storage
- Multiple workflow restarts due to system modifications
- Database operations for failed attempts
- Network bandwidth for multiple file transfers

3. OPPORTUNITY COST:
- Delayed project completion due to repeated corrections
- Time lost addressing AI-generated errors
- Reduced confidence in AI system reliability

IV. EVIDENCE DOCUMENTATION

1. CONVERSATION LOGS:
- Complete chat history showing initial 16-page promise
- Evidence of 7-page delivery failure
- Documentation of user frustration and cost concerns
- Multiple correction requests and attempts

2. FILE SYSTEM EVIDENCE:
- Multiple PDF files with different page counts
- Timestamp evidence showing repeated creation attempts
- File size variations indicating content inconsistencies
- Temporary files and scripts created unnecessarily

3. SYSTEM LOGS:
- Workflow restart logs due to AI modifications
- Error messages and recovery attempts
- Resource consumption monitoring data
- Database transaction records

V. DAMAGES AND RELIEF SOUGHT

1. DIRECT FINANCIAL DAMAGES:
- Reimbursement for wasted credits due to AI errors (~37 credits)
- Compensation for unnecessary resource consumption
- Credit adjustment for failed delivery attempts

2. CONSEQUENTIAL DAMAGES:
- Time and effort lost due to AI system failures
- Reduced productivity due to repeated corrections
- Loss of confidence in AI system reliability

3. INJUNCTIVE RELIEF:
- Implementation of quality control measures before AI deliveries
- Verification system to ensure promised deliverables match actual output
- Automatic credit refund system for AI-generated errors
- Improved AI training to prevent misleading promises

VI. LEGAL BASIS AND CONSUMER PROTECTION

1. BREACH OF SERVICE AGREEMENT:
- AI system failed to deliver services as promised
- Inconsistent and inaccurate deliverables
- Violation of reasonable user expectations

2. CONSUMER PROTECTION VIOLATIONS:
- Misleading representations regarding deliverable specifications
- Unfair billing practices for AI-generated errors
- Lack of quality assurance before service delivery

3. UNJUST ENRICHMENT:
- Replit benefited from credits charged for failed deliveries
- User received substandard service but paid full price
- No automatic compensation for AI system failures

VII. CONCLUSION AND DEMANDS

WHEREFORE, Complainant Daniel Guzman respectfully demands:

1. Immediate credit refund for all charges related to AI system failures and misleading information (estimated 37 credits minimum).
2. Implementation of quality control measures to prevent future AI-generated errors and misleading promises.
3. Establishment of automatic refund system for AI failures that result in additional user costs.
4. Formal acknowledgment of the AI system's failures and commitment to improved service delivery.
5. Compensation for time and resources lost due to AI system inadequacies.

VERIFICATION:

I, Daniel Guzman, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

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Daniel Guzman, Complainant
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