

Exhibit 1



United States of America
Bureau of Consumer Financial Protection

Civil Investigative Demand

To **Credit Acceptance Corporation**
25505 West Twelve Mile Road
Southfield, MI 48034

This demand is issued pursuant to Section 1052 of the Consumer Financial Protection Act of 2010 and 12 C.F.R. Part 1080 to determine whether there is or has been a violation of any laws enforced by the Bureau of Consumer Financial Protection.

Action Required (choose all that apply)

☐ **Appear and Provide Oral Testimony**

Location of Investigational Hearing	Date and Time of Investigational Hearing
	Bureau Investigators

☒ **Produce Documents and/or Tangible Things**, as set forth in the attached document, by the following date 07/01/2020

☒ **Provide Written Reports and/or Answers to Questions**, as set forth in the attached document, by the following date 07/01/2020

Notification of Purpose Pursuant to 12 C.F.R. § 1080.5

The purpose of this investigation is to determine whether auto lenders or associated persons, in connection with originating auto loans (including marketing and selling products ancillary to such loans), servicing loans, collecting debts (including through repossessing vehicles), or consumer reporting, have: (1) made false or misleading representations to consumers, failed to ensure that borrowers received title to their vehicles, or failed to notify consumers of collections lawsuits filed against them, in a manner that is unfair, deceptive, or abusive in violation of §§ 1031 and 1036 of the Consumer Financial Protection Act of 2010 (CFPA), 12 U.S.C. §§ 5531, 5536; (2) knowingly or recklessly provided substantial assistance to others in such violations, also in violation of §§ 1031 and 1036 of the CFPA, 12 U.S.C. §§ 5531, 5536; (3) failed to perform the duties of a furnisher of information to consumer reporting agencies in a manner that violates the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq., principally § 1681s-2, or Regulation V, principally Subpart E; or (4) failed to follow the requirements for providing disclosures to consumers or used advertisements with prohibited content in a manner that violates Regulation Z, 12 C.F.R. Part 1026, principally Subpart C, implementing the Truth in Lending Act, 15 U.S.C. 1601 et seq. The purpose of this investigation is also to determine whether Bureau action to obtain legal or equitable relief would be in the public interest.

Custodian / Deputy Custodian

John C. Wells / Cheryl Goodwin
Bureau of Consumer Financial Protection
1700 G Street NW, Washington, DC 20552

Bureau Counsel

Nina Schichor / Vanessa Buchko

Date Issued
06/01/2020

Signature **John C. Wells**

Digitally signed by
John C. Wells
Date: 2020.06.01
14:23:37 -04'00'

Name / Title **John C. Wells, Deputy Enforcement Director**

Service

The delivery of this demand to you by any method prescribed by the Consumer Financial Protection Act of 2010, 12 U.S.C. § 5562, is legal service. If you fail to comply with this demand, the Bureau may seek a court order requiring your compliance.

Travel Expenses

Request a travel voucher to claim compensation to which you are entitled as a witness before the Bureau pursuant to Section 1052 of the Consumer Financial Protection Act of 2010, 12 U.S.C. § 5562.

Right to Regulatory Enforcement Fairness

The Bureau is committed to fair regulatory enforcement. If you are a small business under Small Business Administration standards, you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

Paperwork Reduction Act

This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

**CIVIL INVESTIGATIVE DEMAND FOR
PRODUCTION OF DOCUMENTS, WRITTEN REPORTS, AND
ANSWERS TO INTERROGATORIES**

I. Requests.

Interrogatories

1. Explain how Reassignment Dates are calculated for reports such as CFPB-CA-0000585 and CFPB-CA-0000586.
2. Explain in detail the meaning of each of the titles in CFPB-CA-0002374.
3. Explain in detail the meaning of the “Reason Descriptions” in CFPB-CA-0002369.
4. Identify by name and last known mailing address, phone number, and e-mail address, all former employees who worked at the Company for six or more months in any position and who were terminated or resigned on or after January 1, 2017, and state the last title or position held, department, and the date of, and reasons for, his or her departure. Do not include the former employees already provided to the Bureau in response to Interrogatory 14 in the April 2019 CID.
5. Provide the date ranges during which CAC used the reports provided in response to Document Request 2. Identify each report by name and Bates Number.
6. Explain how CAC uses the “Recommended Selling Process” video series referenced at CFPB-CA-0047541 at 327. Provide sufficient information to determine the purpose of the videos and the audience for the videos.
7. Provide a chart of all lawsuits filed against CAC during the Applicable Period. The chart should include date filed, case caption, name of counsel, court name, court location, disposition, and disposition date.
8. List all the purposes for which the Company used CFPB-CA-0004711, by providing the following information:
 - a. Explain whether this document was distributed to Company employees, Dealers, consumers, or any other persons;
 - b. List the beginning and ending dates when this document was disseminated to each such group, and provide sufficient information to determine how many times this document was disseminated, when, where, and to whom; and
 - c. If this document was available online, identify every URL and the dates the document was available online at each URL.

9. List all purposes for which the Company used the script found at CFPB-CA-0047870-71 and provide the following information:
 - a. Explain whether this script was distributed to Company employees, Dealers or any other persons;
 - b. List the beginning and ending dates when this script was disseminated to each such group, and provide sufficient information to determine how many times this script was disseminated, when, where, and to whom;
 - c. If this script was available online, identify every URL and the dates the script was available online at each URL; and
 - d. In addition, provide sufficient information to determine how many times this script was used by Dealers in communications with consumers.
10. Describe all audits, reviews, evaluations, self-assessments, compliance reports, monitoring reports, and investigation reports, if any, performed by or on behalf of the Company about Dealer's penetration rates of GAP products and VSC products.
11. Identify all Dealers CAC penalized or reprimanded because the Dealer required consumers to purchase a GAP product or VSC product to finance their car. For each Dealer, provide the Dealer name, Dealer ID, Unique identifier for each Loan (should be the same as in Written Report 3), a brief description of the Dealer's conduct, a brief description of the penalty or reprimand to the Dealer, and any action CAC took to remediate the consumer.
12. List all employment positions at CAC where the compensation of any employee holding such position can vary based on the number of Vehicle Service Contracts ("VSC" or "VSC products") products and GAP insurance products sold and explain how the employee's compensation can so vary.
13. Explain the reason or reasons for CAC's decision to stop allowing Dealers to install Starter Interruption Devices or GPS-SIDs on vehicles effective September 1, 2019. Provide sufficient information to determine who made the decision and what facts they used to make that decision.
14. For each document provided in response to Document Requests 1, 3, and 4 in this CID, list the Bates number in your production and the time period during which the document was in use by the Company.
15. If, at any point during the Applicable Period, you did not send a letter based on one of the Welcome Letter templates to every new Loan borrower and co-borrower, please explain those circumstances in detail.¹ If your response differs

¹ These templates were provided in response to Document Request 3 in this CID or Document Request 16 in the April 2019 CID.

based on types of Loans, time period, or any other factor, please explain.

16. Describe how CAC determines the maximum price it will permit Dealers to charge for a vehicle in CAPS. Provide sufficient information to understand CAC's calculations and what data is used in its calculations.

Requests for Written Reports

Produce the following data in tab-delimited text files, using double-quote-escaped text fields when necessary. Where data derives from separate tables or dimensions, use a separate text file for data elements along each separate dimension. This should comply with at least the first normal form (1NF). Include both unique identifiers, primary keys, and foreign keys (i.e., all fields used to perform joins between tables) in each file expressing the relationship between these files. When data is available for some records and not others, leave the unavailable data items blank (omissions due to unavailability should be identified and discussed during the meet and confer process and described in narrative with the production).

Individual records should never be of varying lengths. Where information exists at the record level requested but is not included in the individual Written Report Request, you are expected to include this information in additional columns in your response to the written report.

Produce the source code for all scripts used to query data responsive to each Request for Written Report. If the data is converted from its native format to comply with the format requirements, please provide the file from which it was derived.

1. All of the data points contained in CFPB-CA-0000586 for the entire Applicable Period (including unique identifiers for the loan/account), plus the following:
 - a. Description of remediation provided to the consumer relating to the delay or failure to provide legal title (remediation includes, but is not limited to, refunding money and ceasing collection activity);
 - b. Dollar value of remediation provided to the consumer relating to the delay or failure to provide legal title, if applicable; and
 - c. Date on which remediation was provided.
2. All of the data points contained in CFPB-CA-0002323 for the entire Applicable Period (including unique identifiers for the loan/account), plus the following:
 - a. The date on which each consumer notified CAC that he or she did not have a copy of the contract;
 - b. The date on which CAC mailed a copy of the contract to each consumer, if applicable;

- c. Description of remediation provided to the consumer relating to the delay or failure to provide a contract to the consumer (remediation includes, but is not limited to, refunding money and ceasing collection activity);
 - d. Dollar value of remediation provided to the consumer relating to the delay or failure to provide a contract to the consumer, if applicable; and
 - e. Date on which remediation was provided.
3. Provide the following for each Loan in the Applicable Period:
- a. Unique identifier for each Loan;
 - b. Account number or unique identifier for account;
 - c. Unique identifier for borrower;
 - d. Unique identifier for co-borrower;
 - e. Dealer name;
 - f. Dealer ID;
 - g. Contract date;
 - h. Date that CAC approved loan for Portfolio Program or Purchase Program;
 - i. Whether the Loan was originated through the Portfolio Program or Purchase Program;
 - j. For Loans in the Portfolio Program, Unique Identifier for the Loan Pool;
 - k. Whether Dealer gave Consumer a copy of the Customer Presentation Sheet at the time of sale;
 - l. Cash Price of the vehicle, as listed in the Loan contract;
 - m. Monthly payment, as listed in the Loan contract;
 - n. Term of the loan, as listed in the Loan contract;
 - o. Annual percentage rate, as listed in the Loan contract;
 - p. Amount financed, as listed in the Loan contract;
 - q. Finance charge, as listed in the Loan contract;
 - r. Down Payment, as listed in the Loan contract;
 - s. Total Sale Price, as listed in the Loan contract;
 - t. Actual Cash Value (as used to calculate Average ACV in the Dealer Dashboard);
 - u. Black Book value of the vehicle at the time of sale as indicated in CAC's system;
 - v. Current Black Book value of the vehicle as indicated in CAC's system;
 - w. Total amount paid by consumer to Dealer, if different from the down payment;
 - x. The date on which legal title was provided to the consumer, if applicable;
 - y. The date on which legal title was provided to CAC, if applicable;
 - z. The date the contract was reassigned to the Dealer, if any;
 - aa. If a GAP product was purchased, the date on which it was purchased;
 - bb. Total amount consumer promised to pay for GAP product, per the GAP contract;
 - cc. Whether the GAP product is financed by CAC or the Dealer;
 - dd. The amount each of the following recipients received from sale of the GAP product: Dealer, CAC, Phoenix American Warranty Company, and

Western Diversified Services, Inc. Respond in separate columns for each recipient.

- ee. Date on which GAP product was cancelled, if applicable;
 - ff. Reason for cancellation;
 - gg. Amount refunded to the consumer as a result of cancellation;
 - hh. If the full amount paid was not refunded, explain in detail why not;
 - ii. If a VSC product was purchased, the date on which it was purchased;
 - jj. Total amount consumer promised to pay for VSC product, per the VSC contract;
 - kk. Whether the VSC product is financed by CAC or the Dealer;
 - ll. The amount each of the following recipients received from the sale of a VSC product: Dealer, CAC, Wynn's Extended Care, Inc., and First Automotive Service Corporation. Respond in separate columns for each recipient;
 - mm. Date on which VSC product was cancelled, if applicable;
 - nn. Reason for cancellation;
 - oo. Amount refunded to the consumer as a result of cancellation; and
 - pp. If the full amount paid was not refunded, explain in detail why not.
4. For each Loan included in your Written Report 3 for which the primary borrower or co-borrower made a claim for GAP coverage, provide the following:
- a. Unique identifier for each Loan (matching the unique identifier provided in Written Report 3);
 - b. Unique identifier for each claim;
 - c. Date of claim;
 - d. Description of the claim;
 - e. All codes used to categorize or classify the claim and a description of the meaning and use of the codes;
 - f. Amount owed to CAC at time GAP claim filed;
 - g. Of the amount owed to CAC at time GAP claim filed, the portion that is considered past-due;
 - h. Of the amount owed to CAC at time GAP claim filed, the portion that is from fees or other costs associated with a past-due payment (e.g., late fees);
 - i. Amount of the claim paid by consumer's primary insurance, not including GAP;
 - j. Excluding the payment listed in subsection (i), list the amount paid toward the GAP claim in separate columns for each payor, including but not limited to, Phoenix American Warranty Company and Western Diversified Services, Inc.;
 - k. If amount paid by the GAP underwriter was less than full amount claimed, explain why in detail (e.g., claim included deficiency balance, loss was caused intentionally by borrower, the vehicle did not constitute a total loss);

- l. If the amount paid by the GAP underwriter was less than full amount claimed, provide any associated codes entered into your system and a description of the meaning and use of the codes;
 - m. Identify the entity that decided whether to allow or reject the claim;
 - n. Identify the entity that decided how much to award in response to the claim;
 - o. Date GAP payment was made, if applicable;
 - p. If no GAP payment made, channel by which decision was communicated to the borrower or co-borrower (e.g., email, phone call, letter);
 - q. If no GAP payment was made, date decision was communicated to the borrower or co-borrower;
 - r. Amount of charges or fees accrued to consumer's account between dates in subsection (c) and (o); and
 - s. Balance in consumer's account after insurance and GAP payments applied, if any.
5. For each Loan included in your Written Report 3 for which the primary borrower or co-borrower made a claim for VSC coverage, provide the following:
 - a. Unique identifier for each Loan (matching the unique identifier provided in Written Report 3);
 - b. Unique identifier for each claim;
 - c. Date of claim;
 - d. Description of the claim;
 - e. Any codes used to categorize or classify the claim and a description of the meaning and use of the codes;
 - g. Amount claimed, if applicable;
 - h. Amount paid in response to the claim;
 - i. Date of payment listed in subsection (h);
 - j. List the amount paid toward the VSC claim in separate columns for each payor, including but not limited to, CAC, Wynn's Extended Care, Inc., and First Automotive Service Corporation;
 - k. If amount paid by VSC underwriter was less than full amount claimed, provide any associated codes entered into your system and a description of the meaning and use of the codes;
 - l. Identify the entity that decided whether to allow or reject the claim;
 - m. Date the decision to allow or reject the claim was communicated to the borrower or co-borrower; and
 - n. Identify entity that decided how much to award in response to the claim.
6. For each Dealer included in your Written Report 3, provide the following for each month during the Applicable Period:
 - a. Dealer name;
 - b. Dealer ID;
 - c. Month-Year (e.g. April 2018)
 - d. Number of contracts approved by the Dealer;

- e. Average Initial Profit (Portfolio), as listed in the Dealer Dashboard;
 - f. Average Portfolio Profit (Portfolio), as listed in the Dealer Dashboard; and
 - g. Average Initial Profit (Purchase), as listed in the Dealer Dashboard.
7. For each consumer complaint received during the Applicable Period, regardless of source, provide the following:
- a. Unique identifier for complaint;
 - b. Date of complaint;
 - c. Account number or unique identifier for account (matching the account number or unique identifier provided in Written Report 3, if applicable);
 - d. Unique identifier for the Loan (matching the unique identifier provided in Written Report 3, if applicable);
 - e. Unique identifier for borrower (matching the unique identifier provided in Written Report 3, if applicable);
 - f. Unique identifier for co-borrower (matching the unique identifier provided in Written Report 3, if applicable);
 - g. Dealer name (if applicable);
 - h. Dealer ID (if applicable);
 - i. Complaint source;
 - j. Description of the complaint;
 - k. Text of the complaint;
 - l. Classification of the complaint, including any codes and a description of the meaning and use of the codes;
 - m. All data fields associated with the complaint;
 - n. Primary issue;
 - o. Sub issue;
 - p. Secondary issue;
 - q. Sub issue for secondary issue;
 - r. CAC's determination of merit of the complaint;
 - s. Complaint resolution;
 - t. CAC's action in response to the complaint (e.g., refunding money to consumer, cancelling contract, reprimanding Dealer);
 - u. Amount of money refunded to consumer, if applicable;
 - v. Date on which CAC cancelled contract, if applicable;
 - w. Complaint close date;
 - x. Service provider name; and
 - y. Service provider ID.
8. For the Dealers listed in Exhibit A, provide the following information for each time the Company took corrective action because of compliance concerns. For purposes of this Written Report, "corrective action" includes but is not limited to requiring additional training, terminating the relationship, not funding as many Loans, not funding any new Loans, imposing a sanction, reducing the amount of money CAC pays the Dealer, reducing the speed at which portfolio profits are

paid, requiring the Dealer to sign an acknowledgment form or an audit acknowledgment form, or any other sanction CAC imposes.

- a. Dealer Name;
 - b. Dealer ID;
 - c. Unique identifier for corrective action occurrence (use company code or abbreviation, if available);
 - d. Date of corrective action;
 - e. Description of the compliance concern(s);
 - f. The corrective action that the Company imposed (including the scope or time period for the action if applicable);
 - g. The date on which the Company imposed the corrective action on the dealer;
 - h. By what channel the decision to impose the corrective action was communicated to the dealer;
 - i. Identify the entity that made the decision to impose the corrective action (if this decision was made by a CAC employee, include the name, title, department, and employee identifier);
 - j. Identify the entity that communicated to the dealer the decision to impose the corrective action (if this decision was made by a CAC employee, include the name, title, department, and employee identifier);
 - k. All remediation or redress provided to consumers by the Company because of this compliance concern.
9. For each unique individual Loan originated by a Dealer listed in Exhibit A and impacted by a compliance concern referenced in your response to subsection (e) of Written Report 8, provide the following information:
 - a. Dealer Name;
 - b. Dealer ID;
 - c. Unique identifier for each Loan (matching the unique identifier provided in Written Report 3, if applicable);
 - d. Description of the compliance concern (matching the terms used in Written Report 8(e));
 - e. Unique identifier for the corrective action occurrence (matching the unique identifier in Written Report 8(c));
 - f. Description of any non-monetary relief related to the corrective action occurrence that was provided by the Company to the borrower or co-borrower of each Loan, because of the corrective action occurrence; and
 - g. Amount of money related to the corrective action occurrence that was provided by the Company to the borrower or co-borrower of each Loan.
10. For every account listed in Exhibit B, provide:
 - a. Unique identifier for each Loan (matching the unique identifier provided in Written Report 3, if applicable);
 - b. Account number or unique identifier for account (matching the account number or unique identifier provided in Written Report 3, if applicable);

- c. Unique identifier for borrower (matching the unique identifier provided in Written Report 3, if applicable);
 - d. Unique identifier for co-borrower (matching the unique identifier provided in Written Report 3, if applicable);
 - e. The title-related problem that led CAC to provide a refund;
 - f. List the amount paid by the consumer until date of refund, in separate columns for each payee, including but not limited to, CAC and the Dealer;
 - g. List the amount paid by the consumer until contract was terminated, in separate columns for each payee, including but not limited to, CAC and the Dealer;
 - h. List the amount refunded to each recipient, including but not limited to, the Dealer and the consumer;
 - i. Date refund was provided;
 - j. Whether refund was mailed or deposited into an account;
 - k. Type of location where check was sent or deposited (e.g., to Dealer or to Consumer);
 - l. Amount refunded by Dealer to consumer, if known;
 - m. Date contract terminated; and
 - n. Date consumer received valid legal title.
11. For each account number included in Written Report 3 and 7 (and 9 and 10 if not already included in Written Report 3), provide the following:
- a. Unique identifier for each Loan (matching the unique identifier provided in Written Report 3, if applicable);
 - b. Account number or unique identifier for account (matching the account number or unique identifier provided in Written Report 3, if applicable);
 - c. Unique identifier for borrower (matching the unique identifier provided in Written Report 3, if applicable);
 - d. Unique identifier for co-borrower (matching the unique identifier provided in Written Report 3, if applicable);
 - e. Date vehicle was purchased;
 - f. Dealer name;
 - g. Dealer ID;
 - h. Dealer state;
 - i. Primary borrower's last name;
 - j. Primary borrower's first name;
 - k. Primary borrower's street address;
 - l. Primary borrower's city;
 - m. Primary borrower's state;
 - n. Primary borrower's phone number;
 - o. Primary borrower's email address;
 - p. Co-borrower's last name;
 - q. Co-borrower's first name;
 - r. Co-borrower's street address;
 - s. Co-borrower's city;

- t. Co-borrower's state;
 - u. Co-borrower's phone number; and
 - v. Co-borrower's email address.
12. For each debt collection lawsuit filed against a borrower/co-borrower related to a Loan included in your Written Report 3, provide the following:
- a. Unique identifier for each Loan (matching the unique identifier provided in Written Report 3);
 - b. Unique identifier for the debt collection lawsuit;
 - c. Date of the debt collection lawsuit;
 - d. Name of defendant in the lawsuit;
 - e. State in which the lawsuit was filed;
 - f. Court in which the lawsuit was filed;
 - g. Case number for the lawsuit;
 - h. Resolution of the lawsuit (e.g., dismissed without prejudice, dismissed with prejudice, judgment entered); and
 - i. If garnishment was entered as a result of the lawsuit, the total dollar amount of the garnishment.

Requests for Documents

1. All Customer Approval Sheet templates or Customer Presentation Sheet templates used by the Company at any time during the Applicable Period and 10 exemplars.
2. Versions of the following reports and the data underlying the reports covering the full Applicable Period (underlying data must be produced consistent with the instructions relating to the Requests for Written Reports):

CAC Title	Bates No
Advance on Hold	CFPB-CA-0002368
Bad Behavior Model Report	CFPB-CA-0002369
Consolidated Dealer Monitoring Report	CFPB-CA-0002370
Audits from Kies	CFPB-CA-0002374

3. All Welcome Letter templates used by the Company at any time during the Applicable Period, aside from those produced in response to Document Request 16 in the April 2019 CID.
4. All Payment Due Notice templates used by the Company at any time during the Applicable Period, aside from those produced in response to Document Request 16 in the April 2019 CID.

5. Records sufficient to substantiate corrective action taken by the Company, as referenced in Written Report 8 as well as all documents recording or substantiating the Company's compliance concerns that led to those actions. Do not reproduce documents already provided in response to Document Request 13 of the April 2019 CID. If documents were cited on the privilege log and CAC maintains they are privileged, cite them on the privilege log submitted in response to this CID as well.
6. Provide all documents relating to the files in Exhibit C. The files should include all notes in Artiva, consumer complaints, all origination documents, all internal correspondence and correspondence with the Dealer and consumer, both sides of all cancelled refund checks for any check sent to the consumer, and full payment history. In the metadata for each document, please use the following naming convention: account number_space_dash_space_title of document in your system. For all cashed checks, please add the words "cash check" to the end of the metadata.
7. Provide all documents relating to the files in Exhibit D. The files should include all notes in Artiva, consumer complaints, all origination documents, all internal correspondence and correspondence with the Dealer and consumer, both sides of all cancelled refund checks for any check sent to the consumer, and full payment history. In the metadata for each document, please use the following naming convention: account number_space_dash_space_title of document in your system. For all cashed checks, please add the words "cash check" to the end of the metadata.
8. The "Recommended Selling Process" video series referenced at CFPB-CA-0047541 at 327-334.

II. Definitions.

- A. **"And"** and **"or"** must be construed both conjunctively and disjunctively.
- B. **"Any"** includes **"all,"** and **"all"** includes **"any."**
- C. **"Bureau"** means the Bureau of Consumer Financial Protection.
- D. **"CID"** means the Civil Investigative Demand, including the Requests, Definitions, and Instructions.
- E. **"Company"** or **"you"** or **"your"** means Creative Acceptance Corporation and any successor in interest, as well as its parent companies, wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates.

F. **“Dealer”** means any Person that offers loans to consumers that are originated by, serviced by, purchased by, or assigned to the Company.

G. **“Deputy Enforcement Director”** refers to a Deputy Assistant Director of the Office of Enforcement.

H. **“Direct Dispute”** means “a dispute submitted directly to a furnisher (including a furnisher that is a debt collector) by a consumer concerning the accuracy of any information contained in a consumer report and pertaining to an account or other relationship that the furnisher has or had with the consumer,” as set forth in 12 C.F.R. §1022.41(b).

I. **“Dispute Address”** means the address of the Company at which it accepts Direct Dispute notices from consumers.

J. **“Document”** means any written matter of every type and description, including electronically stored information. “Document” includes any non-identical copy (such as a draft or annotated copy) of another document.

K. **“Each”** includes **“every,”** and **“every”** includes **“each.”**

L. **“Electronically Stored Information,”** or **“ESI,”** means the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise) of any electronically created or stored information, including but not limited to e-mail, instant messaging, videoconferencing, SMS, MMS, or other text messaging, and other electronic correspondence (whether active, archived, unsent, or in a sent or deleted-items folder), word-processing files, spreadsheets, databases, unorganized data, document metadata, presentation files, and sound recordings, regardless of how or where the information is stored, including if it is on a mobile device.

M. **“Enforcement Director”** refers to the Assistant Director of the Office of Enforcement.

N. **“Identify”** means to provide: (a) for natural persons, their name, title or position, present business affiliation, present business address, e-mail address, and telephone number, or if a present business affiliation or present business address is not known, the last known business address, home address, e-mail address, and telephone number; (b) for businesses or other organizations, a unique identifier that remains static in all responses provided by the Company, the name, address, identities of officers, directors, or managers of the business or organization, and contact persons with e-mail addresses and telephone numbers, where applicable; and (c) for documents, the title, date, authors, recipients, Bates numbers, if applicable, type of document or some other means of identifying the document, and the present or last known location or custodian.

- O. **“Indirect Dispute”** means a consumer dispute that is sent to the Company by a Consumer Reporting Agency.
- P. **“Loan”** means any loan to a consumer that it originated by, serviced by, purchased by, or assigned to the Company.
- Q. **“Loss Ratio”** means the VSC loss ratio report on the Dealer Dashboard.
- R. **“Metro 2”** means that Metro 2 format developed by the Consumer Data Industry Association that is the current industry standard format for furnishing information to consumer reporting agencies.
- S. **“Person”** means an individual, partnership, company, corporation, association (incorporated or unincorporated), trust, estate, cooperative organization, or other entity.
- T. **“Referring to”** or **“relating to”** means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, comprising, showing, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.
- U. **“Starter Interruption Device”** means a device that allows a vehicle to be disabled remotely and includes a GPS-SIDs device.

III. Instructions.

- A. **Sharing of Information:** This CID relates to a nonpublic, law-enforcement investigation being conducted by the Bureau. The Bureau may make its files available to other civil and criminal federal, state, or local law-enforcement agencies under 12 C.F.R. §§ 1070.43(b)(1) and 1070.45(a)(5). Information you provide may be used in any civil or criminal proceeding by the Bureau or other agencies. As stated in 12 C.F.R. § 1080.14, information you provide in response to this CID is subject to the requirements and procedures relating to the disclosure of records and information set forth in 12 C.F.R. pt. 1070.
- B. **Meet and Confer:** As stated in 12 C.F.R. § 1080.6(c), you must contact Enforcement Attorney **Nina Schichor** at **202-435-9770** as soon as possible to schedule a telephonic meeting to discuss your response to the CID. The meeting must be held within **10** calendar days after you receive this CID or before the deadline for filing a petition to modify or set aside the CID, whichever is earlier.
- C. **Applicable Period for Responsive Materials:** Unless otherwise directed, the applicable period for the request is from January 1, 2017 until May 31, 2020.
- D. **Privilege Claims:** If any material responsive to this CID is withheld on the

grounds of privilege, you must make the privilege claim no later than the date set for the production of the material. As stated in 12 C.F.R. § 1080.8(a), any such claim must include a schedule of the documents, information, or tangible things withheld that states, for each:

1. its type, specific subject matter, and date;
2. the names, addresses, positions, and organizations of all authors and direct or indirect recipients;
3. the specific grounds for claiming the privilege;
4. the request to which the privileged document, information, or thing is responsive; and
5. its Bates number or range.

In addition, the person who submits the schedule and the attorney stating the grounds for the privilege must sign it. A person withholding material solely based on a claim of privilege must comply with the requirements of 12 C.F. R. § 1080.8 rather than file a petition for an order modifying or setting aside a demand under 12 C.F.R. § 1080.6(e). Please follow the enclosed Document Submission Standards for further instructions about producing redacted privileged documents.

E. **Document Retention:** Until you are notified otherwise, you are required to retain all documents and other tangible things that you used or relied on in responding to this CID. In addition, you must retain, and suspend any procedures that may result in the destruction of, documents, information, or tangible things that are in any way relevant to the investigation, as described in the CID's Notification of Purpose. You are required to prevent the destruction of relevant material irrespective of whether you believe such material is protected from future disclosure or discovery by privilege or otherwise. *See* 18 U.S.C. §§ 1505, 1519.

F. **Modification Requests:** If you believe that the scope of the search or response required by this CID can be narrowed consistent with the Bureau's need for documents or information, you are encouraged to discuss such possible modifications, including modifications of the requirements of these instructions, with Enforcement Attorney **Nina Schichor** at **202-435-9770**. Modifications must be agreed to in writing by the Enforcement Director or a Deputy Enforcement Director. 12 C.F.R. § 1080.6(d). **The Bureau does not accept unilateral modifications written into production letters.**

G. **Petition for Order Modifying or Setting Aside Demand:** Under 12 U.S.C. § 5562(f) and 12 C.F.R. § 1080.6(e), you may petition the Bureau for an order modifying or setting aside this CID. To file a petition, you must send it by e-mail to the

Bureau's Executive Secretary at ExecSec@cfpb.gov, copying the Enforcement Director at Enforcement@cfpb.gov, within 20 calendar days of service of the CID or, if the return date is less than 20 calendar days after service, before the return date. The subject line of the e-mail must say "Petition to Modify or Set Aside Civil Investigative Demand." If a request for confidential treatment is filed, you must file a redacted public petition in addition to the unredacted petition. All requests for confidential treatment must be supported by a showing of good cause in light of applicable statutes, rules, Bureau orders, court orders, or other relevant authority.

H. **Certification:** The person to whom the CID is directed or, if it is directed to an entity, any person having knowledge of the facts and circumstances relating to the production, must certify that the response to this CID is true and complete. This certification must be made on the form declaration included with this CID. **This certification must be unmodified by CAC.**

I. **Scope of Search:** This CID covers materials and information in your possession, custody, or control, including but not limited to documents in the possession, custody, or control of your attorneys, accountants, other agents or consultants, directors, officers, and employees.

J. **Document Production:** The Bureau encourages the electronic production of all material responsive to this CID; please follow the enclosed Document Submission Standards.

For all packages destined for Bureau offices, please contact Enforcement Attorney **Nina Schichor** for the mailing or internet-protocol address.

Please provide any tracking numbers by e-mail to Enforcement Attorney **Nina Schichor** at nina.schichor@cfpb.gov.

K. **Document Identification:** Documents that may be responsive to more than one request of this CID need not be submitted more than once. All documents responsive to this CID must be accompanied by an index that identifies: (i) the name of each custodian of each responsive document; (ii) the corresponding Bates number or range used to identify that person's documents; and (iii) the request or requests to which each document responds.

L. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information, sensitive health information of any individual, or Suspicious Activities Reports, please contact Enforcement Attorney **Nina Schichor** at **202-435-9770** before sending those materials to discuss ways to protect the information during production. You must encrypt electronic copies of such materials with encryption software acceptable to the Bureau. When submitting encrypted material, you must provide the encryption key, certificate, or passcode in a separate communication.

For purposes of this CID, sensitive personally identifiable information includes an individual's Social Security number alone or an individual's name, address, or phone number *in combination with* one or more of the following: date of birth, Social Security number, driver's-license number or other state-identification number, or a foreign country equivalent, passport number, financial-account number, credit-card number, or debit-card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

M. Information Identification: Each request for a written report or interrogatory in this CID must be answered separately and fully in writing under oath. All information submitted must clearly and precisely identify the request or requests to which it is responsive.

N. Submission of Documents in lieu of Reports or Answers: Documents in existence before your receipt of this CID that contain the information requested in any interrogatory may be submitted as part of or in lieu of an answer to the interrogatory. If you submit documents as part of or in lieu of an answer, you must clearly indicate the specific request to which the documents are responsive, and you must clearly identify the specific portion of the documents that are responsive, including page, paragraph, and line numbers, as applicable.

O. Declaration Certifying Records of Regularly Conducted Business Activity: Attached is a Declaration Certifying Records of Regularly Conducted Business Activity, which may limit the need to subpoena you to testify at future proceedings to establish the admissibility of documents produced in response to this CID. Please execute this Declaration and provide it with your response.

P. All references to “**year**” or “**annual**” refer to the calendar year. Where information is requested “for each year,” provide it separately for each year; where yearly data is not available, provide responsive information for the calendar year to date, unless otherwise instructed.

Q. Duty to Estimate: If you are unable to answer any interrogatory fully, supply such information as is available. Explain why such answer is incomplete, the efforts you made to obtain the information, and the source from which the complete answer may be obtained. If books and records that provide accurate answers are not available, enter best estimates and describe how the estimates were derived, including the sources or bases of such estimates. Estimated data should be followed by the notation “est.” If there is no reasonable way to make an estimate, provide an explanation.



DLR ID	DLR NM
TPS	ANY CREDIT AUTO SALES, INC., LLC
F6Z	Auto Giants, Inc.
HUA	AUTO MAX USA INC
SX4	Auto World Inc.
DTW	AUTOMARKET AT WOLFCHASE LLC
BX8	Betten Friendly Motors Company; DBA: Preferred Chrysler Dodge Jeep of Muskegon
59T	BIG THREE AUTO SALES INC
22E	Bob Ruth Ford Inc (PA) (LW)
3JJ	Car City of Danbury LLC
FHS	CARS R US OF AUGUSTA INC
3LD	Custom Auto Sales (CO)
WV2	ELITE AUTO SALES, LLC
A15R	EZ LOAN AUTOPLEX, LLC
4ZZ	FOREIGN AUTO IMPORTS LLC
A0B3, A0B5, A0QU, A137, VZR, W2V, WFG, WG5, WGB, WGD, WPQ, Y8A, ZMG, ZMJ, ZQZ	Fuccillo Automotive Group
4KD	GERALD ROYER
K7A	HAH PREOWNED AUTO OUTLET, INC
DGS	HAWKINSON NISSAN LLC
2W6, 95M	Holler Imports of Winter Park Inc., Roger Holler Chevrolet Company (FL)
MM7	HOMER SKELTON FORD, INC.
T43	JOE SISNEROS CAR & TRUCK CENTER (NM) (LW)
UM9	JOSEPH SAGE AUTO SALES, INC
2G0	Kelly Nissan, INC. (IL) (LW)
2XY	KINGSTON AUTOMOTIVE LLC
3MB	L.A. MOTORS INC
32E	NEVER SAY NO AUTO, LLC
W5L	PAUL BLANCO'S GOOD CAR COMPANY LAS VEGAS
17G	RACEWAY MOTORS, LLC
LUP	RICK MILLER
8VX	SANTA MOTORS INC
2B5	SINA AUTO SALES INC
B0C	SKIPPERS AUTO MART INC
MYD	STERLING RENTAL INC
Several Lots	Tate Dealerships- 5 Lots
2B2	THE CAR STORE, INC
LCV	TWINS AUTO SALES INC
1AZ	UNDERWOOD ENTERPRISES LLC
HY2, 41D, PJG	US AUTO SALES
42U	VAN DEVERE, INC.
4RQ	WEBSMART AUTO INC



Dealer ID	Dealer Name	Account Number
97	Lone Star Cleburne Autoplex, Inc.	86361564
0A8	Wes Financial Auto Group, Inc	84836567
0AD	Nourse Fmly Of Dlershps Chillicothe Inc	83432876
0DD	Auto Acceptance Center Inc	81597675
0DD	Auto Acceptance Center Inc	84003763
0DD	Auto Acceptance Center Inc	87164885
0DD	Auto Acceptance Center Inc	86741065
0DD	Auto Acceptance Center Inc	87470967
0GR	Fontainebleau Auto Sales Inc	81760899
0JG	Zimmerman Motor Cars, Llc	80423524
0JG	Zimmerman Motor Cars, Llc	81295349
0JG	Zimmerman Motor Cars, Llc	81142944
0JG	Zimmerman Motor Cars, Llc	80330500
0JG	Zimmerman Motor Cars, Llc	80891951
0JG	Zimmerman Motor Cars, Llc	81182317
0JG	Zimmerman Motor Cars, Llc	81189544
0JG	Zimmerman Motor Cars, Llc	81246219
0JG	Zimmerman Motor Cars, Llc	80377488
0JG	Zimmerman Motor Cars, Llc	81299660
0JG	Zimmerman Motor Cars, Llc	81073159
0JG	Zimmerman Motor Cars, Llc	80354344
0JG	Zimmerman Motor Cars, Llc	79814131
0JG	Zimmerman Motor Cars, Llc	81182371
0JG	Zimmerman Motor Cars, Llc	81234335
0ME	Parkway Chevrolet Inc	88212005
0YS	Premier Automotive Llc	81978753
12N	Kernersville Chrysler Dodge, Llc	86528272
14N	Wind Rider Auto Outlet, Inc.	81913151
1CC	Angel Auto Inc	82564897
1FP	Autoplex Of Augusta Llc	84736358
1GE	D & J Motors Inc	81677104
1GE	D & J Motors Inc	81555926
1GE	D & J Motors Inc	81550674
1GE	D & J Motors Inc	81468797
1GE	D & J Motors Inc	81752678
1IX	Ple Enterprises Inc	82200477
1KX	Zumbrota Ford Sales Llc	87801780
1KX	Zumbrota Ford Sales Llc	87955913
1NV	Hamilton Avenue Auto Sales Inc	86237507
1WI	Jim Butler Used Cars Llc	88826250
1ZP	D C Enterprise Inc	81367152
1ZP	D C Enterprise Inc	82837491
1ZP	D C Enterprise Inc	82895747
1ZP	D C Enterprise Inc	82692830
1ZP	D C Enterprise Inc	83870420
27H	Lindsay Ford, Llc	87698354
27H	Lindsay Ford, Llc	88117311
2B1	Deer Automotive Group, Llc	82895682
2HQ	G & J Automotive Inc	81968320
2HQ	G & J Automotive Inc	80649394
2HX	Ejb Motors Inc	83523412
2JC	4 Rides Auto Sales Llc	85469256
2RS	Auto Select Inc	85460700
2SN	Voyage Auto Sales Inc	86820547
2T2	John Michael Willerford	82176949
2UA	Hayes Motor Company Llc	81098049
2VF	Luxury Motors Llc	80868849
2VF	Luxury Motors Llc	80885425
2YY	Meena's Corp	79379492

30J	Mid-Rivers Motors Llc	80983954
315	Shirey's Auto Sales	84705573
315	Shirey's Auto Sales	84724516
315	Shirey's Auto Sales	84516944
315	Shirey's Auto Sales	85072365
315	Shirey's Auto Sales	84482968
315	Shirey's Auto Sales	84734623
315	Shirey's Auto Sales	84845909
315	Shirey's Auto Sales	85103911
315	Shirey's Auto Sales	84883530
315	Shirey's Auto Sales	84254453
315	Shirey's Auto Sales	84597711
315	Shirey's Auto Sales	84359006
31D	Auto Stop, Inc.	81972442
31E	Cross Keys Auto, Inc.	84575619
31P	Auto Centers West Llc	83690323
31P	Auto Centers West Llc	84164916
31U	Pay Day Motors, Llc	82384560
31U	Pay Day Motors, Llc	80328601
31U	Pay Day Motors, Llc	84032333
31U	Pay Day Motors, Llc	84296050
31U	Pay Day Motors, Llc	84392697
32Q	The Car Barn Llc	82345675
32Q	The Car Barn Llc	84043827
33T	Queens Auto Mall Inc	82237546
35E	Hudson Auto Trade Llc	82904088
37E	Carrolandia 1 Auto Sales, Inc.	83108785
37F	Jack Gosch Ford Inc	75836785
397	Charlotte Used Car Central Inc	82690939
3AL	Any Credit Auto Sales Llc	81760436
3BL	K & T Tire And Auto Of Tampa Fowler Inc	83001762
3BP	Pro Marketing & Advertising Llc	83491207
3FB	Jf Enterprises Llc	84902362
3FV	B & T Enterprises Services Inc	84394930
3HF	Foreign Auto Sales Llc	86073151
3HF	Foreign Auto Sales Llc	85979492
3HF	Foreign Auto Sales Llc	85883135
3HF	Foreign Auto Sales Llc	85861726
3HF	Foreign Auto Sales Llc	85831095
3HF	Foreign Auto Sales Llc	85809605
3HF	Foreign Auto Sales Llc	85848135
3HF	Foreign Auto Sales Llc	86137408
3HF	Foreign Auto Sales Llc	86130200
3HF	Foreign Auto Sales Llc	86051405
3HF	Foreign Auto Sales Llc	85314876
3HQ	Classic Chevrolet Inc	82306472
3IM	Smart Motors Inc	82778197
3KA	Harborcreek Resales Llc	84686310
3KR	All Credit Car Sales Llc	85255488
3LD	Custom Auto Sales Llc	86878414
3LD	Custom Auto Sales Llc	86962690
3LD	Custom Auto Sales Llc	87686755
3LD	Custom Auto Sales Llc	87306576
3LD	Custom Auto Sales Llc	87675580
3LD	Custom Auto Sales Llc	87634469
3LD	Custom Auto Sales Llc	88297267
3LD	Custom Auto Sales Llc	87634321
3LD	Custom Auto Sales Llc	87706920
3LD	Custom Auto Sales Llc	87769728
3LD	Custom Auto Sales Llc	87774752
3LD	Custom Auto Sales Llc	87767929

3LD	Custom Auto Sales Llc	87821482
3LD	Custom Auto Sales Llc	87821866
3LD	Custom Auto Sales Llc	87791629
3LD	Custom Auto Sales Llc	87813556
3LD	Custom Auto Sales Llc	87875707
3LD	Custom Auto Sales Llc	87945098
3LD	Custom Auto Sales Llc	88130110
3LD	Custom Auto Sales Llc	88111932
3LD	Custom Auto Sales Llc	88129787
3LD	Custom Auto Sales Llc	88103756
3LD	Custom Auto Sales Llc	88044813
3LD	Custom Auto Sales Llc	88113416
3LD	Custom Auto Sales Llc	88285756
3LD	Custom Auto Sales Llc	88287051
3LH	Reliable Autos Llc	83419648
3MF	Victoria Motors Llc	89101107
3NA	Superior Motors Colerain Llc	81419387
3QG	Harandi's Corporation	86024034
3QI	Ellis Ave Ok Cars And Trucks Inc	82593569
3QI	Ellis Ave Ok Cars And Trucks Inc	83250934
3QI	Ellis Ave Ok Cars And Trucks Inc	83147554
3QI	Ellis Ave Ok Cars And Trucks Inc	83079687
3QI	Ellis Ave Ok Cars And Trucks Inc	83193567
3QI	Ellis Ave Ok Cars And Trucks Inc	83169367
3QI	Ellis Ave Ok Cars And Trucks Inc	83150453
3QI	Ellis Ave Ok Cars And Trucks Inc	83148966
3QI	Ellis Ave Ok Cars And Trucks Inc	83099798
3QI	Ellis Ave Ok Cars And Trucks Inc	83077467
3QI	Ellis Ave Ok Cars And Trucks Inc	83080634
3QI	Ellis Ave Ok Cars And Trucks Inc	83210502
3QI	Ellis Ave Ok Cars And Trucks Inc	83025643
3QI	Ellis Ave Ok Cars And Trucks Inc	82884421
3QI	Ellis Ave Ok Cars And Trucks Inc	83179271
3QI	Ellis Ave Ok Cars And Trucks Inc	82976177
3QI	Ellis Ave Ok Cars And Trucks Inc	82967350
3QI	Ellis Ave Ok Cars And Trucks Inc	82966571
3QI	Ellis Ave Ok Cars And Trucks Inc	82959126
3QI	Ellis Ave Ok Cars And Trucks Inc	82926925
3QI	Ellis Ave Ok Cars And Trucks Inc	82808903
3QI	Ellis Ave Ok Cars And Trucks Inc	83008702
3QI	Ellis Ave Ok Cars And Trucks Inc	83502135
3QI	Ellis Ave Ok Cars And Trucks Inc	83426182
3QI	Ellis Ave Ok Cars And Trucks Inc	83384804
3QI	Ellis Ave Ok Cars And Trucks Inc	83341842
3QI	Ellis Ave Ok Cars And Trucks Inc	82864453
3QI	Ellis Ave Ok Cars And Trucks Inc	83075082
3QI	Ellis Ave Ok Cars And Trucks Inc	82633622
3QI	Ellis Ave Ok Cars And Trucks Inc	82572453
3QI	Ellis Ave Ok Cars And Trucks Inc	83116164
3QI	Ellis Ave Ok Cars And Trucks Inc	82562658

3QI	Ellis Ave Ok Cars And Trucks Inc	83099901
3QI	Ellis Ave Ok Cars And Trucks Inc	82932935
3QI	Ellis Ave Ok Cars And Trucks Inc	83481803
3QI	Ellis Ave Ok Cars And Trucks Inc	83341076
3QI	Ellis Ave Ok Cars And Trucks Inc	83306017
3QI	Ellis Ave Ok Cars And Trucks Inc	83327658
3QI	Ellis Ave Ok Cars And Trucks Inc	83195206
3QI	Ellis Ave Ok Cars And Trucks Inc	83129576
3QI	Ellis Ave Ok Cars And Trucks Inc	82991898
3TA	Joe Machens Ford Inc	78075063
3UJ	Charles Saad	81702890
3UJ	Charles Saad	83647610
3UJ	Charles Saad	76589485
3W3	Grote Automotive Inc	84552788
3WK	Louisiana Imports Of Baton Rouge Llc	82638109
3WQ	Key Automotive Sales & Service Inc	83622018
3YQ	New Auto Gallery Inc	80925117
3YX	Victory Auto Group Llc	81430928
41D	Approved 1st, Inc.	81843545
42D	Jake Sweeney Chevrolet Imports Inc.	86823654
42D	Jake Sweeney Chevrolet Imports Inc.	87208700
42T	Mccluskey Automotive Llc	85796309
46P	Auto Gallery Inc.	86581978
4BY	Lostboyz Unlimited Llc	78439870
4DL	Moore's Used Auto Sales, Llc	80688628
4HY	Hibdon Auto Center, Inc.	88808943
4LG	Satterfield Motor Co Llc	83534504
4LG	Satterfield Motor Co Llc	36220541
4LN	Charlene M Connolly	86959325
4LN	Charlene M Connolly	90770605
4LN	Charlene M Connolly	90452467
4P1	Gilbo Enterprises Inc	77612141
4PJ	Gerardo Robles & Elizabeth Perales	84073278
4PJ	Gerardo Robles & Elizabeth Perales	84800509
4QQ	Dbe Enterprises Inc	81650668
4RZ	Sharp Car Co	78687802
4RZ	Sharp Car Co	78317493
4XZ	Gateway Buick Gmc, Inc.	77635662
4YF	Auto Usa Wholesale Llc	82354475
4YF	Auto Usa Wholesale Llc	84202939
4ZZ	Foreign Auto Imports Llc	82552796
4ZZ	Foreign Auto Imports Llc	84833725
4ZZ	Foreign Auto Imports Llc	86916694
51C	Christine Lee And Ryan Vincent Lee	79152262
52A	Bezema Motors Corporation	86783656
53D	Harpwell Auto Sales, Inc.	84593708
57Y	George's Enterprises, Inc.	84194041
5BA	Day's Morgantown Hyundai Llc	84033194
5F3	Mrw, Inc.	82862471
5G3	Crain Chevrolet, Llc	80534131
5G3	Crain Chevrolet, Llc	83168897
5GU	Najjar Auto Mall Inc	81938942
5GU	Najjar Auto Mall Inc	81537823
5GU	Najjar Auto Mall Inc	82050509
5GU	Najjar Auto Mall Inc	82126540
5GU	Najjar Auto Mall Inc	81866723

5GV	Mark C Johnson And Tom Stovall	82780412
5I7	Car Factory Inc	84166300
5I7	Car Factory Inc	85107387
5I7	Car Factory Inc	85258537
5I7	Car Factory Inc	84569714
5QP	Ball Automotive	77648488
5SR	Buffalo Auto Rental Inc	81754339
5SR	Buffalo Auto Rental Inc	81733976
5TN	Dokes Quality Auto Sales, Inc	84209674
5VA	Graff Chevrolet Inc	88655674
5VI	Tw'n Inc	82303549
5WB	Hot Rides, Inc.	85198925
60G	James Dimaggio	88165705
63M	Long Island Auto Find Inc	83644527
63M	Long Island Auto Find Inc	83752456
63M	Long Island Auto Find Inc	83711273
63M	Long Island Auto Find Inc	83709262
64B	Mendenall Motors, Inc.	87089155
64B	Mendenall Motors, Inc.	86977760
64B	Mendenall Motors, Inc.	86974327
66G	Bridgeview Auto Sales, Inc	86875741
66G	Bridgeview Auto Sales, Inc	87175229
66G	Bridgeview Auto Sales, Inc	87154211
66G	Bridgeview Auto Sales, Inc	87273121
66G	Bridgeview Auto Sales, Inc	87338611
66G	Bridgeview Auto Sales, Inc	87329329
66G	Bridgeview Auto Sales, Inc	87303614
66G	Bridgeview Auto Sales, Inc	87441668
66G	Bridgeview Auto Sales, Inc	87493532
66G	Bridgeview Auto Sales, Inc	87459364
66G	Bridgeview Auto Sales, Inc	87472249
683	Roberts Company Motor Mart Llc	89485390
6CW	Abc Auto Brokers Inc	87432752
6DV	Trevino's Auto Sales Inc	79217591
6DV	Trevino's Auto Sales Inc	86333113
6FF	Maypole Chevrolet Inc	83871650
6FL	Robert Cucurull	83491684
6KD	C & S Auto Sales Inc	83572731
6KQ	Hudson Ford Llc	87360019
6LM	Bastians Auto Outlet Inc	83860240
6ND	Gerald Jones Vw Inc	84815852
6PJ	Suburban Imports Of Farmington Hills Inc	38211193
6TI	Infiniti Of Union City Llc	83143901
6UJ	Jeff Schmitt Chevrolet Ltd	79169828
6XV	Prestige Auto Sales Inc	85523394
6Y9	Deals R Us Auto Sales Inc	83485282
6Y9	Deals R Us Auto Sales Inc	83426922
6Y9	Deals R Us Auto Sales Inc	83196829
6Y9	Deals R Us Auto Sales Inc	83585868
6Y9	Deals R Us Auto Sales Inc	83266946
6Z9	Jim Rutkowski	40940615
75L	Mlh Roth, Inc	84577183
75L	Mlh Roth, Inc	84271918
75L	Mlh Roth, Inc	84646106
75L	Mlh Roth, Inc	84893609
75L	Mlh Roth, Inc	85056341
75L	Mlh Roth, Inc	84921140
75L	Mlh Roth, Inc	84269053
75L	Mlh Roth, Inc	84782186
75L	Mlh Roth, Inc	84576197
7AT	Martin Riley Motorcars Llc	78520397

7FA	Route 66 Auto Mart Inc	85693404
7 K	Bmc Llc	85676527
7IM	Cornerstone Chevrolet Llc	87636980
7LH	Frank Leta Automotive Outlet Inc	83165461
7LH	Frank Leta Automotive Outlet Inc	78634919
7LR	Approved Auto Mart Inc	83138328
7PM	Gillaspia Investment Group Inc	82519372
7PM	Gillaspia Investment Group Inc	83708125
7QZ	Uhlmann Motors Inc	75561163
7SK	Thomas Johnson	48765007
7XL	Paramount Homes Inc	83232725
7YD	Alexa Motors Inc	81560080
82J	Tristate Automotive Group Inc	81452401
82J	Tristate Automotive Group Inc	82316130
82J	Tristate Automotive Group Inc	83368521
82J	Tristate Automotive Group Inc	83396851
82J	Tristate Automotive Group Inc	83674186
82J	Tristate Automotive Group Inc	83401278
82J	Tristate Automotive Group Inc	83625883
82J	Tristate Automotive Group Inc	83618887
82J	Tristate Automotive Group Inc	83559118
82J	Tristate Automotive Group Inc	83812963
82J	Tristate Automotive Group Inc	83727004
82J	Tristate Automotive Group Inc	83470261
82J	Tristate Automotive Group Inc	83471896
82J	Tristate Automotive Group Inc	83585277
82J	Tristate Automotive Group Inc	83504709
82J	Tristate Automotive Group Inc	83658213
82J	Tristate Automotive Group Inc	83352859
82J	Tristate Automotive Group Inc	83478104
82J	Tristate Automotive Group Inc	83595416
82J	Tristate Automotive Group Inc	84010248
82J	Tristate Automotive Group Inc	83863003
82J	Tristate Automotive Group Inc	83641377
82J	Tristate Automotive Group Inc	83502326
82N	Eminoglu Used Car Dealer Ltd	82212226
82N	Silk City Auto Mall Inc	84506297
82N	Silk City Auto Mall Inc	83342026
82N	Silk City Auto Mall Inc	85392043
87C	Bob Tomes Ford, Inc.	82006963
87H	Temple Mac Haik Dodge Ltd	83478027
8AS	Toby Gillaspie	75249098
8BI	Hrr Motors Llc	88660597
8BI	Hrr Motors Llc	88900349
8BY	Eas Finance Llc	81172442
8FH	Hp Automotive Group Llc	84933093
8FP	Mainstreet Wholesale Cars, Llc	83618877
8IQ	Linwood L. Ling, Jr.	85864572
8MM	Triple Crown Auto Sales Inc	87155460
8MM	Triple Crown Auto Sales Inc	90522410
8NT	Bc Investments Llc	83078971
8PE	Legacy Motor Company Inc	82750741
8TK	Tnt Auto Sales Llc	86704448
8UY	Sterling Automotive Llc	85661120
8UY	Sterling Automotive Llc	86522536
8UY	Sterling Automotive Llc	86458459
8XB	Chamberlayne Auto Sales & Repairs Inc	81941986
8XB	Chamberlayne Auto Sales & Repairs Inc	81993627
8XW	Geoff Rogers Motor Company Llc	82414255

8XW	Geoff Rogers Motor Company Llc	85225375
8YA	Legacy Auto Group Inc	84865820
8YA	Legacy Auto Group Inc	84997160
8YU	Brookfield Chrysler Dodge Jeep Inc	85274499
8YX	Kings Autoshow Nj Inc	77145631
8Z9	Express Auto Inc	85081920
8Z9	Express Auto Inc	85462814
91Z	Manassas Auto Truck & Tractor Inc	81662751
91Z	Manassas Auto Truck & Tractor Inc	84710374
92K	Jjr Inc	82902898
92L	Days Auto Sales Inc	80179386
9BN	Jetset Enterprise Inc	80003634
9JD	Auto Mart Llc	82134648
9JD	Auto Mart Llc	81793268
9JD	Auto Mart Llc	81890699
9JD	Auto Mart Llc	81913644
9JD	Auto Mart Llc	81832560
9JD	Auto Mart Llc	81650220
9JD	Auto Mart Llc	81623842
9JD	Auto Mart Llc	81641576
9JD	Auto Mart Llc	81666956
9JD	Auto Mart Llc	81837432
9JD	Auto Mart Llc	82331302
9JD	Auto Mart Llc	81910707
9JD	Auto Mart Llc	81712246
9JD	Auto Mart Llc	81899043
9JD	Auto Mart Llc	82152806
9JP	Cam Automotive Llc	82077645
9JP	Cam Automotive Llc	87857014
9JP	Cam Automotive Llc	88222941
9KH	Cj's Enterprises Group Inc	85932999
9KS	Fast Lane Auto Inc	86032153
9LN	Edward L Hardin	84101511
9LN	Edward L Hardin	84202856
9LN	Edward L Hardin	84341665
9QS	Richard L Carson	81235035
9QS	Richard L Carson	82618388
9VV	Newark Chrysler Plymouth Inc	85677907
9Y5	Premier Auto Group Inc	82840817
9YW	Tko Motorsales Inc	83704139
A03N	Car Plus Motors Llc	90055364
A063	Lamar Mcneil	89188580
A063	Lamar Mcneil	89470784
A06L	Atlanta South Auto Brokers Llc	88295311
A0BY	Auto Junction Llc	88441346
A0C9	1st Place, Llc	88574292
A0G2	Mr Auto & Company, Inc	88054970
A0KP	Godwin's Auto Sales, Llc	88586769
A0L	Unlimited Motors Llc	82936677
A0MP	Grayson Auto Sales Llc	88619288
A0PF	Merlon Palacios	88579430
A0PF	Merlon Palacios	88868892
A0PF	Merlon Palacios	88859023
A0PP	U Save Auto Sales Inc	89647412
A0PP	U Save Auto Sales Inc	89389598
A0PP	U Save Auto Sales Inc	89372971
A0ZH	Clickit Rv Llc	88409937
A178	Mathew M Morgan	89605384
A178	Mathew M Morgan	88805726
A1G	Cars R Us Omg Llc	81407909
A1J	N O Wholesale Llc	75552099

A1W0	Jerrys Ford Sales Inc	89598905
A1X1	Hwy 112 Sales Llc	90629590
A35W	Delaneys Auto Sales Llc	90448246
A3BP	Napleton's Mid Rivers Motors, Inc.	93682430
A3K	Trever Hallmark	79416268
A3NM	Hw Automotive Llc	91187412
A3P	Avon Auto Brokers, Inc	87238705
A3SR	Integrity Motor Group, Inc.	92101960
A3U	R V Auto Sales Llc	80396686
A4BV	Yellow Point Auto Sales Llc	92557697
A6H	Wheel The Deal Inc	83222367
A6H	Wheel The Deal Inc	83503264
A6H	Wheel The Deal Inc	83510043
A6H	Wheel The Deal Inc	83229657
A6H	Wheel The Deal Inc	83482113
A6H	Wheel The Deal Inc	83471102
A6H	Wheel The Deal Inc	83571306
A6H	Wheel The Deal Inc	83813548
A6H	Wheel The Deal Inc	83725509
A6H	Wheel The Deal Inc	83698696
A6H	Wheel The Deal Inc	83905107
A6H	Wheel The Deal Inc	83639947
ABQ	Crazy Carls Inc	85198611
ACK	Juanita Rodriguez	76573426
ALW	Joanna Palacios	79049611
ANK	Harold Hodson Jr	85790224
APJ	Hempstead Auto Sales Llc	88425491
AQR	Usa Auto Sales & Leasing Corp	80552157
ATS	J & J Auto Brokers Llc	85017388
ATS	J & J Auto Brokers Llc	88343470
AVC	First Class Autos Inc	82191309
AZI	Willson Enterprises Llc	83899904
AZI	Willson Enterprises Llc	88594203
AZI	Willson Enterprises Llc	89182997
AZP	James L Seitz	82460382
AZP	James L Seitz	83561128
AZY	D.C. Enterprises Of Tulsa, Inc	83707569
B1Y	Auto Connect Llc	81759915
B2M	Hollywood Motor Co	82269329
B4R	Circle City Auto Exchange Inc	81530041
B5N	K.C.'s Auto Sales Inc	81824458
B5N	K.C.'s Auto Sales Inc	79864475
B5N	K.C.'s Auto Sales Inc	81660068
B5N	K.C.'s Auto Sales Inc	80871429
B5N	K.C.'s Auto Sales Inc	80138761
B5N	K.C.'s Auto Sales Inc	78425837
B6Q	Patriot Auto Sales Group Inc	82002081
B6Q	Patriot Auto Sales Group Inc	83040424
B6Q	Patriot Auto Sales Group Inc	82930883
B6Q	Patriot Auto Sales Group Inc	82715905
B6Q	Patriot Auto Sales Group Inc	82733384
B6Q	Patriot Auto Sales Group Inc	82524872
B7C	John P. Jones	81729868
B7C	John P. Jones	81483741
B9L	Auto Credit Warehouse Llc	80687553
B9L	Auto Credit Warehouse Llc	80546279
B9L	Auto Credit Warehouse Llc	80421160
B9L	Auto Credit Warehouse Llc	80692417
B9L	Auto Credit Warehouse Llc	80706156
B9L	Auto Credit Warehouse Llc	80595063
B9L	Auto Credit Warehouse Llc	80457280

B9L	Auto Credit Warehouse Llc	80654465
B9L	Auto Credit Warehouse Llc	80879018
B9L	Auto Credit Warehouse Llc	80628247
B9L	Auto Credit Warehouse Llc	80493407
B9L	Auto Credit Warehouse Llc	80453021
BCK	K. Williams Investments, Llc	84554784
BCK	K. Williams Investments, Llc	84552702
BCK	K. Williams Investments, Llc	84520459
BCK	K. Williams Investments, Llc	84574709
BCK	K. Williams Investments, Llc	84565586
BCK	K. Williams Investments, Llc	84738152
BCK	K. Williams Investments, Llc	84735319
BCK	K. Williams Investments, Llc	84696680
BCK	K. Williams Investments, Llc	84728404
BCK	K. Williams Investments, Llc	84666915
BCK	K. Williams Investments, Llc	84588929
BCZ	Bouler Inc	81843160
BCZ	Bouler Inc	81536769
BCZ	Bouler Inc	81709640
BCZ	Bouler Inc	81789585
BCZ	Bouler Inc	81658086
BCZ	Bouler Inc	82008167
BCZ	Bouler Inc	81743586
BCZ	Bouler Inc	81753990
BCZ	Bouler Inc	81768569
BCZ	Bouler Inc	81847704
BCZ	Bouler Inc	81677674
BCZ	Bouler Inc	81780983
BCZ	Bouler Inc	81685102
BCZ	Bouler Inc	81835374
BCZ	Bouler Inc	81642313
BCZ	Bouler Inc	81694529
BCZ	Bouler Inc	81661283
BCZ	Bouler Inc	81723137
BCZ	Bouler Inc	81752106
BFY	Crown Central Llc	84915519
BGN	Affordable Auto Wholesalers, Inc.	82429585
BKK	Penuel Enterprises Llc	85238324
BL9	Ryan Auto Sales Inc	84974476
BMR	Frank Myers Auto Maxx, Llc	84069375
BRA	James K. Nichols	82490067
BUK	Elite 1 Auto Inc	79060043
BUV	East Coast Performance Consultants Llc	82015418
BUV	East Coast Performance Consultants Llc	82427634
BUV	East Coast Performance Consultants Llc	81941295
BUV	East Coast Performance Consultants Llc	82326709
BUV	East Coast Performance Consultants Llc	82326395
BUV	East Coast Performance Consultants Llc	82007275
BUV	East Coast Performance Consultants Llc	82383770
BVX	Stephen Molter	84496722
BXY	Easy Auto Sales Llc	81155711
BYC	Tomko Enterprises Inc	77222467
BYC	Tomko Enterprises Inc	80798520
BZQ	Chicago Auto Source Inc	84598887
C0N	Robbie Miller, Randal J. Miller And Eun Lee	81541881
C0V	Twins Auto Sales Inc	83064503
C1S	Credit Cars Select Llc	80750339
C1S	Credit Cars Select Llc	80975766

C3T	Central Arkansas Auto Brokers Inc	84174250
C3T	Central Arkansas Auto Brokers Inc	84802272
C3T	Central Arkansas Auto Brokers Inc	82991588
C3T	Central Arkansas Auto Brokers Inc	85172562
C6N	Jeffrey Rose	81376919
C6N	Jeffrey Rose	83794557
C8K	Andy El-Sharrak	82557889
C8S	Marietta Motor Company Inc	86101040
C8W	Oleg E. Evseev	79041945
CDD	Linden Used Cars Inc	81345078
CDE	Price Is Right Auto Sales Llc	76716596
CE9	One Way Enterprises, Inc.	82672859
CFW	Highview Auto Sales Llc	87942935
CGL	Jean Saliba & Souheil Saliba	85722942
CKR	Trotter Auto El Dorado Llc	86059237
CKZ	S & J Auto Sales Llc	82377077
CKZ	S & J Auto Sales Llc	85268980
CKZ	S & J Auto Sales Llc	85285379
CKZ	S & J Auto Sales Llc	85226817
CKZ	S & J Auto Sales Llc	85297711
CLC	Cash Cow Auto Sales Inc	82123939
CLP	Car Star Inc	88293663
CNV	Heritage Motors Inc	88705104
CVC	Zoe Auto Sales Llc	81847405
CVR	Creative Venture Enterprises L.L.C.	91134080
CWJ	Albert Chevrolet Inc	83640262
CXD	One Stop Auto Sales Inc	84980466
CXR	Sierra Automotive Llc	82134839
CZY	Jet Auto Sales Inc	82606749
CZZ	Dancola Inc	80850615
D3H	Montgomery Used Auto Sales Llc	85430126
D4J	Mdg Associates Llc	81547208
D4J	Mdg Associates Llc	81363021
D4J	Mdg Associates Llc	80996051
D4J	Mdg Associates Llc	81127193
D4J	Mdg Associates Llc	81455708
D4J	Mdg Associates Llc	81194836
D4J	Mdg Associates Llc	81109163
D4J	Mdg Associates Llc	80856188
D4J	Mdg Associates Llc	81178997
D5M	Luis Carrera	82474524
D5M	Luis Carrera	82304354
D5M	Luis Carrera	83117946
D5M	Luis Carrera	83025450
D5M	Luis Carrera	83155937
D5M	Luis Carrera	83240055
D6H	Gmt Auto Sales Inc	83066295
D8C	Florence Auto Mart Inc	83129455
DBJ	Okees Used Auto Sales Inc	84693553
DDA	Norman Nasser	85496685
DFF	Derek Davis	82090156
DFF	Derek Davis	84724220
DFF	Derek Davis	84908159
DFF	Derek Davis	84585225
DFF	Derek Davis	84660120
DFF	Derek Davis	84673136
DFP	Abelardo Trevino	86243242
DFP	Abelardo Trevino	86227221
DFX	Dean & Millington Llc	81451335
DFX	Dean & Millington Llc	81856665

DGJ	Fanello Enterprise Llc	91686523
DHA	Ferris Chevrolet Inc	84148752
DLC	Advance Autos Llc	77881889
DLW	Jackson Station Llc	84284764
DLW	Jackson Station Llc	84263132
DMS	Bert Motorsports And Auto Sales Inc	81728969
DMS	Bert Motorsports And Auto Sales Inc	84705341
DMV	Addyson Motors, Llc	81356296
DQ9	Big Blue Autos Llc	84812159
DQA	Lakeview Motors Llc	77683463
DQS	Infinity Auto Sales, Inc.	76977434
DQT	Mid Atlantic Auto Sales Inc	79214922
DRX	Normans Glass & Auto Services Inc	83891765
DSD	Jill Hamilton	82478795
DTM	M & M Auto Group Inc	86024832
DV5	Tommy D Harris	88311352
DVT	Piles Chevrolet & Buick, Inc	79766732
DWQ	Quality Motors Llc	86775573
DWQ	Quality Motors Llc	87066765
DWQ	Quality Motors Llc	87327243
DWQ	Quality Motors Llc	87312172
DWQ	Quality Motors Llc	87539215
DWQ	Quality Motors Llc	87431688
DXB	Absolute Auto Approval Llc	82314684
DYA	Premier Automotive Of Tennessee Llc	83096718
DYF	Dan Witham	78021159
DZB	Kunes Country Chevrolet Cadillac Inc	83463160
DZB	Kunes Country Chevrolet Cadillac Inc	84304432
E08	Sonju Two Harbors Llc	81035296
ET9	Suntrup Hyundai, Inc.	83181830
EZ0	Mcmahon Ford Company	81399481
EZ0	Mcmahon Ford Company	85094982
EZ0	Mcmahon Ford Company	85961286
F1H	Daniel T. Renusch	84981004
F2K	Johnnie L Robinson li	81822722
F3W	M Ballah Auto Sales And Services Inc	84813311
F6S	V A N Car Company Inc	82968766
F9D	Automotive Restyling Concepts Inc	83244458
FCR	Piercey North Inc	82589787
FDU	Superior Auto Solutions Llc	81534045
FE5	Legacy Auto Sales Inc	82569236
FE5	Legacy Auto Sales Inc	82972730
FE5	Legacy Auto Sales Inc	83824705
FE5	Legacy Auto Sales Inc	84119324
FGK	Skyline Auto Sales, Llc	80459290
FJV	Sonia's Auto Sales Inc	77330129
FJV	Sonia's Auto Sales Inc	83615404
FL6	South Dayton Auto & Truck Service Llc	81904340
FMP	H & F Auto Sale Inc	83805351
FMP	H & F Auto Sale Inc	83898301
FMP	H & F Auto Sale Inc	83820691
FMP	H & F Auto Sale Inc	83770834
FMP	H & F Auto Sale Inc	83956675
FMP	H & F Auto Sale Inc	84393184
FMP	H & F Auto Sale Inc	83974649
FNG	All Star Auto Group Llc	81372665
FQS	Fletcher Automotive No 20, Llc	81588810
FQS	Fletcher Automotive No 20, Llc	83321961

FTR	Cars On Route 21 Of Newark Llc	84080220
FUZ	Auto Care Express Llc	79503316
FWG	Logistical Marketing Inc	85486776
FWG	Logistical Marketing Inc	85517987
FWG	Logistical Marketing Inc	85476655
FWG	Logistical Marketing Inc	85778217
FWM	U-Deal Motors, Llc	81117240
FWM	U-Deal Motors, Llc	80771034
FYF	Liberia Auto Group Inc	84604907
FYF	Liberia Auto Group Inc	84801592
FZV	Accurate Auto Group Inc	83703243
G2H	Breon North	79468790
G3H	Dave Liston's Auto Outlet Llc	87997162
G5S	Image Auto Sales Llc	83367939
G5S	Image Auto Sales Llc	84302479
G5S	Image Auto Sales Llc	85417778
G6G	Discount Auto & Finance Center Llc	81155743
G6G	Discount Auto & Finance Center Llc	81971813
G6G	Discount Auto & Finance Center Llc	81788257
G6G	Discount Auto & Finance Center Llc	82326950
G6G	Discount Auto & Finance Center Llc	82455677
G6G	Discount Auto & Finance Center Llc	81625638
G6G	Discount Auto & Finance Center Llc	81832863
G6G	Discount Auto & Finance Center Llc	82070157
G6G	Discount Auto & Finance Center Llc	81770693
G6G	Discount Auto & Finance Center Llc	81704133
G6G	Discount Auto & Finance Center Llc	82578276
G6G	Discount Auto & Finance Center Llc	81743944
G6G	Discount Auto & Finance Center Llc	82440780
G6G	Discount Auto & Finance Center Llc	82600297
G6G	Discount Auto & Finance Center Llc	82385371
G6G	Discount Auto & Finance Center Llc	82293253
G6G	Discount Auto & Finance Center Llc	81957250
G6G	Discount Auto & Finance Center Llc	82337324
G6G	Discount Auto & Finance Center Llc	81773896
G6G	Discount Auto & Finance Center Llc	82574288
G6G	Discount Auto & Finance Center Llc	82234966
G6G	Discount Auto & Finance Center Llc	82035196
G6G	Discount Auto & Finance Center Llc	82570442
G6G	Discount Auto & Finance Center Llc	82628398
G6G	Discount Auto & Finance Center Llc	81893825
G6G	Discount Auto & Finance Center Llc	82213467
G6G	Discount Auto & Finance Center Llc	82183033
G6G	Discount Auto & Finance Center Llc	82530480
G6G	Discount Auto & Finance Center Llc	82269319
G6U	Kenneth D. Walton	81460609
G6Y	Eide Auto Center Inc	84389515
G7H	Eckelman Enterprises Llc	81489723
G8A	Nyc Motorcars Corporation	83820579
G8P	Next Auto Llc	83623728
G8P	Next Auto Llc	83784964

GAX	Usa1 Auto Sales Inc	85257223
GBJ	Alma Leticia Robles	84569021
GCA	Pristine Auto Sales Of Okla Llc	77033028
GCN	Baton Rouge Sports & Imports Inc	81380597
GCN	Baton Rouge Sports & Imports Inc	81453084
GCN	Baton Rouge Sports & Imports Inc	81880803
GCN	Baton Rouge Sports & Imports Inc	81706613
GCN	Baton Rouge Sports & Imports Inc	81741266
GCN	Baton Rouge Sports & Imports Inc	81816307
GCN	Baton Rouge Sports & Imports Inc	81762482
GCN	Baton Rouge Sports & Imports Inc	81945809
GGH	American Eagle Automotive Llc	85695969
GGP	Solo Industries Inc	84327721
GGP	Solo Industries Inc	83652079
GGP	Solo Industries Inc	83813974
GGP	Solo Industries Inc	84349006
GGP	Solo Industries Inc	84066055
GGY	Eagle Auto Enterprise Inc	84074160
GHC	A B C Auto Sales Inc	78428205
GJH	Zeus Associates Llc	81444105
GJQ	Leo Auto Broker Inc	84918439
GJQ	Leo Auto Broker Inc	84676639
GJQ	Leo Auto Broker Inc	85291269
GJQ	Leo Auto Broker Inc	85400291
GJQ	Leo Auto Broker Inc	85825367
GJQ	Leo Auto Broker Inc	85362939
GJQ	Leo Auto Broker Inc	85861630
GJQ	Leo Auto Broker Inc	85524275
GJQ	Leo Auto Broker Inc	85455579
GJQ	Leo Auto Broker Inc	85848821
GJQ	Leo Auto Broker Inc	85230150
GJQ	Leo Auto Broker Inc	85702144
GJQ	Leo Auto Broker Inc	85996416
GJQ	Leo Auto Broker Inc	85324270
GKF	Family Businesses Llc	77554701
GKF	Family Businesses Llc	82378147
GKL	H/R Auto Sales Llc	83059217
GKL	H/R Auto Sales Llc	82561814
GKL	H/R Auto Sales Llc	83260551
GKL	H/R Auto Sales Llc	82650346
GKL	H/R Auto Sales Llc	83301205
GKL	H/R Auto Sales Llc	83286404
GKL	H/R Auto Sales Llc	82553451
GKL	H/R Auto Sales Llc	83162259
GKL	H/R Auto Sales Llc	83055681
GKT	Automatic Auto Credit Llc	80413422
GKT	Automatic Auto Credit Llc	83939957
GKT	Automatic Auto Credit Llc	85461838
GKT	Automatic Auto Credit Llc	85083496
GM7	Griffy Motor Company, Llc	81477171
GM7	Griffy Motor Company, Llc	81338896
GMN	Top Geer Llc	78225172
GMX	My Fico Auto Inc	79783592
GQ4	Mt Moriah Auto Sales Inc	87275685
GQ4	Mt Moriah Auto Sales Inc	87551014
GQ4	Mt Moriah Auto Sales Inc	87742090
GQ4	Mt Moriah Auto Sales Inc	87904597
GQ4	Mt Moriah Auto Sales Inc	88645130
GQ4	Mt Moriah Auto Sales Inc	88158888

GQ4	Mt Moriah Auto Sales Inc	88160924
GQP	Bob Caldwell Automotive Inc	87047994
GQQ	Baber I Chaudhry	84299232
GQQ	Baber I Chaudhry	83772405
GQQ	Baber I Chaudhry	84310256
GQQ	Baber I Chaudhry	84298495
GRJ	Orange Auto Group Inc	84127113
GTK	Rwf & Msw Llc	87299729
GTK	Rwf & Msw Llc	87098077
GTK	Rwf & Msw Llc	87022719
GU6	Collierville Auto Center, Inc.	87966338
GUL	Elite Wholesale Auto, Llc	85506916
GVY	Big Mack Llc	78583227
GVY	Big Mack Llc	81453519
GWH	American Dream Motors Llc	81274484
GWH	American Dream Motors Llc	81148146
GWH	American Dream Motors Llc	81095555
GWH	American Dream Motors Llc	80884400
GWH	American Dream Motors Llc	81673018
GWH	American Dream Motors Llc	81522504
GWH	American Dream Motors Llc	81083069
GWS	Farmingdale Motors Inc	81170548
GXY	Cvt Llc	82392983
GXY	Cvt Llc	83007696
GXY	Cvt Llc	83115971
GXY	Cvt Llc	83099258
GXY	Cvt Llc	82858674
GXY	Cvt Llc	82834839
GXY	Cvt Llc	82979128
GXY	Cvt Llc	82249753
GXY	Cvt Llc	82499846
GYL	Showroom Auto Sales Inc	82786541
GYL	Showroom Auto Sales Inc	80742497
GYL	Showroom Auto Sales Inc	82643270
GYL	Showroom Auto Sales Inc	82743401
GYL	Showroom Auto Sales Inc	82802092
GYL	Showroom Auto Sales Inc	82921919
GYL	Showroom Auto Sales Inc	82727137
GYL	Showroom Auto Sales Inc	82362423
GYL	Showroom Auto Sales Inc	82631615
GYL	Showroom Auto Sales Inc	82586703
GYL	Showroom Auto Sales Inc	82880201
GYL	Showroom Auto Sales Inc	82786940
GYL	Showroom Auto Sales Inc	82725604
GYL	Showroom Auto Sales Inc	82756131
GYL	Showroom Auto Sales Inc	82739549
GZY	T & G Auction Services Llc	77333798
H00L	Christopher Epps And Terrion Jones	91495334
H00L	Christopher Epps And Terrion Jones	92261247
H6F	Matthew Atchison Llc	84983755
H6F	Matthew Atchison Llc	85478069
H6N	Montgomery Auto Sales Llc	82766625
H6S	Ellie Razi	81256578
H6U	All Phases Auto Sales Llc	82727951
H6U	All Phases Auto Sales Llc	83128419
H6U	All Phases Auto Sales Llc	82760811
H6U	All Phases Auto Sales Llc	83211748
H6W	Joseph James Pinocchio	88902940
H7G	Star Motors Llc	85345664
H7G	Star Motors Llc	86076302
H7Z	Lou Fusz Motor Co	84131156

H80	Lou Fusz Motor Company	85348383
H8V	Cars Inn Inc	83690491
HCG	Bennetts Auto Sales Of Ocala Inc	79048411
HCH	Suburban Imports Of Farmington Hills Inc	85025694
HDQ	Bugg Motors, Llc	89019435
HDQ	Bugg Motors, Llc	88817712
HFC	Lundy Motors Llc	79809394
HFZ	Rose City Motors Inc	83736761
HGH	South Street Auto Inc	77725776
HHB	Jerome K. Holmes	87601565
HJ6	Auto Maxx Llc	83854922
HJ6	Auto Maxx Llc	83267955
HJ6	Auto Maxx Llc	83848770
HJ8	Wills Used Cars Llc	82013613
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83640415
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	84053584
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	84140171
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83774077
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83892688
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83824751
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83660707
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83708137
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83993844
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	84153454
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	84139239
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	84080101
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	84070790
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83981545
HJV	Christopher Carrol Cogburn, Steve Wayne Moore	83993844
HL6	Sandy Lane Auto Llc	81341569
HLH	Tri State Auto Group Llc	82059821
HLH	Tri State Auto Group Llc	83933001
HLL	Pdq Auto Brokers Llc	79943895
HN4	Judson Motors Llc	83961016
HN5	Terrell L. Dudley	81859036
HNY	Preferred Motor Company Llc	82248354
HPH	Premier Automotive Of Kansas City Llc	81492562
HRC	Baltimore Auto Locators Inc	80318827
HRW	Consolidated Solutions Inc	82571139
HST	Talent Investments Inc	78716431
HT5	Napoli Indoor Auto Outlet Llc	82903222
HT6	Alabama Direct Auto, Llc	81279694
HT6	Alabama Direct Auto, Llc	81486792
HT6	Alabama Direct Auto, Llc	81477572
HT6	Alabama Direct Auto, Llc	81634888
HT6	Alabama Direct Auto, Llc	81250390
HT6	Alabama Direct Auto, Llc	80962463
HT6	Alabama Direct Auto, Llc	81419581
HT6	Alabama Direct Auto, Llc	81611294
HT6	Alabama Direct Auto, Llc	81718216
HT6	Alabama Direct Auto, Llc	81682219
HT6	Alabama Direct Auto, Llc	81445217
HT6	Alabama Direct Auto, Llc	81399712
HT6	Alabama Direct Auto, Llc	81656119
HT6	Alabama Direct Auto, Llc	81231383

HT6	Alabama Direct Auto, Llc	81460860
HT6	Alabama Direct Auto, Llc	81586080
HT6	Alabama Direct Auto, Llc	81827713
HT6	Alabama Direct Auto, Llc	81703626
HT6	Alabama Direct Auto, Llc	81592612
HT6	Alabama Direct Auto, Llc	81427402
HT6	Alabama Direct Auto, Llc	81537982
HT6	Alabama Direct Auto, Llc	81427544
HTX	Massey Motors Inc.	84013928
HU5	Samuel W. White	81103409
HU7	A-1 Auto Group Llc	83874013
HVK	Arshad Hussain	85220117
HVW	Ghazel Motors Llc	81982898
HVW	Ghazel Motors Llc	81912631
HVW	Ghazel Motors Llc	81932062
HVW	Ghazel Motors Llc	82749190
HVW	Ghazel Motors Llc	81934193
HVW	Ghazel Motors Llc	82224614
HVW	Ghazel Motors Llc	82412642
HVW	Ghazel Motors Llc	81891801
HVW	Ghazel Motors Llc	82070252
HVW	Ghazel Motors Llc	81973888
HVW	Ghazel Motors Llc	82170834
HVW	Ghazel Motors Llc	82805468
HVW	Ghazel Motors Llc	81878597
HVW	Ghazel Motors Llc	81959880
HVW	Ghazel Motors Llc	81904650
HVW	Ghazel Motors Llc	81877017
HWC	Credit Max Automotive Llc	81907744
HXM	Platnium Auto Connection Llc	81772623
HY3	Lou Fusz Motor Company Of Creve Coeur	82838255
HY3	Lou Fusz Motor Company Of Creve Coeur	83416177
HYN	Nicholson's College Cars, Llc	81626888
HYN	Nicholson's College Cars, Llc	83208640
HYX	Luxury Cars Inc	78598970
HZF	Tradewind Auto Sales Llc	84533190
HZR	Ohio Motor Group Llc	84386585
IZ5	Sam Lemans I, Llc	82456010
J2A	Paul Blancos Good Car Company Fresno Inc	88120761
J2G	Auto Outlet Preowned Llc	83166325
J2G	Auto Outlet Preowned Llc	83002849
J2G	Auto Outlet Preowned Llc	82895813
J2G	Auto Outlet Preowned Llc	83074133
J2G	Auto Outlet Preowned Llc	83246919
J2W	Roman Realty Management Services Llc	80545437
J3P	Southeastern Auto Sales Llc	86228427
J4T	Great Sierra, Llc	79074493
J5V	Usa Auto Dealers Inc	86248155
J6N	United Auto Sales Of Ft Pierce Llc	83957994
J6N	United Auto Sales Of Ft Pierce Llc	90815414
J6T	Jakes Used Cars Llc	80480067
J7Z	United Auto Corp	84788953
J8J	Kenan Appelhans And Martin Appelhans	86730097
J8K	Iman Marwan Sakka	82625551
J9X	46 Vans & Trucks Llc	81936060
J9X	46 Vans & Trucks Llc	81803499
J9X	46 Vans & Trucks Llc	81145877
J9X	46 Vans & Trucks Llc	81770940
J9X	46 Vans & Trucks Llc	81880056

JAT	Yvonne Mastromatteo	87944890
JBA	Hawkins And Sons Inc	79598540
JBA	Hawkins And Sons Inc	79896070
JBA	Hawkins And Sons Inc	81317277
JBK	Hands Down Auto Sales Llc	84934257
JBK	Hands Down Auto Sales Llc	84168221
JBK	Hands Down Auto Sales Llc	84294355
JCC	Fastlane Auto Credit, Inc	84649397
JCC	Fastlane Auto Credit, Inc	85054990
JCC	Fastlane Auto Credit, Inc	84619904
JCC	Fastlane Auto Credit, Inc	84951369
JCD	Mohammad Reza And Melissa M York	82872850
JCJ	Baker Motor Corporation	81380965
JCJ	Baker Motor Corporation	84801665
JCJ	Baker Motor Corporation	85710807
JCJ	Baker Motor Corporation	85036069
JDA	Edgar Padilla Gutierrez And Jose Alfredo Padilla Gutierrez	81502352
JDP	Public Auto Auction Of Oklahoma Inc	79436337
JFH	Ufac Auto Superstore Llc	81364785
JFL	Square Deal Auto Sales & Service Llc	90168290
JFP	Orient Auto Sales Llc	81252312
JGV	James Mowatt	84453391
JGV	James Mowatt	83937189
JGV	James Mowatt	84226430
JGV	James Mowatt	84024782
JGV	James Mowatt	83755647
JGV	James Mowatt	83998389
JKQ	Aaron Tucker	84597947
JKT	Area Auto Center Llc	82355189
JML	Crain K Of Conway Llc	81736120
JPk	Outlet Rental Car Sales Of Dothan Inc	83468340
JPS	Old Towne Motors Inc	89138715
JPW	Williams Auto Sales Llc	88784634
JQL	Potomac Auto Llc	86218883
JQN	J D Motors Llc	83108415
JQN	J D Motors Llc	83941750
JQN	J D Motors Llc	83680251
JQN	J D Motors Llc	84347618
JQN	J D Motors Llc	83971175
JQN	J D Motors Llc	84074876
JQN	J D Motors Llc	83836668
JQN	J D Motors Llc	83426583
JQN	J D Motors Llc	85467386
JQN	J D Motors Llc	83865946
JQN	J D Motors Llc	84036801
JRL	Infinity Motors Llc	84069267
JRL	Infinity Motors Llc	79374723
JST	Jireh Divine Inc	82076204
JVF	James Stone	81940547
JVF	James Stone	82175775
JVF	James Stone	82211157
JVW	New School Auto Llc	81137844
JVW	New School Auto Llc	81243142
JVW	New School Auto Llc	81436120
JVW	New School Auto Llc	81892163
JVW	New School Auto Llc	82003917
JVW	New School Auto Llc	81588149
JVW	New School Auto Llc	81216293
JVW	New School Auto Llc	81216265
JVW	New School Auto Llc	81581286

JVW	New School Auto Llc	81091311
JVW	New School Auto Llc	81765924
JVW	New School Auto Llc	81817531
JVW	New School Auto Llc	81612376
JVW	New School Auto Llc	81679801
JXL	Mainstreet Wholesale Cars Llc	83146060
JXL	Mainstreet Wholesale Cars Llc	83102838
JXL	Mainstreet Wholesale Cars Llc	83362935
JXL	Mainstreet Wholesale Cars Llc	83347232
JXL	Mainstreet Wholesale Cars Llc	83353086
JXL	Mainstreet Wholesale Cars Llc	83224742
JXL	Mainstreet Wholesale Cars Llc	83125285
JXY	Tom's Finance Center, Llc	78858749
JYK	Cabral Motorgroup Llc	81564457
JYK	Cabral Motorgroup Llc	81708818
JYK	Cabral Motorgroup Llc	81597107
JYK	Cabral Motorgroup Llc	81220258
JYK	Cabral Motorgroup Llc	81509797
JYR	David G Davis	83170723
JYX	Prestige Motor Sales Inc	85154997
JYZ	Sheriff Auto Sales Llc	83224035
JYZ	Sheriff Auto Sales Llc	83162930
JYZ	Sheriff Auto Sales Llc	83399595
JYZ	Sheriff Auto Sales Llc	83319767
JYZ	Sheriff Auto Sales Llc	82929102
JYZ	Sheriff Auto Sales Llc	83245176
JYZ	Sheriff Auto Sales Llc	83214843
JYZ	Sheriff Auto Sales Llc	82896135
JYZ	Sheriff Auto Sales Llc	83299964
JYZ	Sheriff Auto Sales Llc	83447313
JYZ	Sheriff Auto Sales Llc	83416030
JYZ	Sheriff Auto Sales Llc	83358127
JYZ	Sheriff Auto Sales Llc	83297529
JYZ	Sheriff Auto Sales Llc	83496834
JYZ	Sheriff Auto Sales Llc	83516180
JYZ	Sheriff Auto Sales Llc	83300572
JYZ	Sheriff Auto Sales Llc	83241408
JZ5	Car Cloud Auto Group Inc	88232995
JZC	Brookside Auto Sales Llc	79791099
JZQ	109 Auto Sales Inc	82533801
K0D	Jesus Naranjo	78892960
K0S	H G Rhodes Inc	82694367
K0S	H G Rhodes Inc	82703810
K0S	H G Rhodes Inc	82671691
K0S	H G Rhodes Inc	82773198
K0S	H G Rhodes Inc	82722339
K0S	H G Rhodes Inc	83049492
K0S	H G Rhodes Inc	82869532
K0S	H G Rhodes Inc	83234981
K0S	H G Rhodes Inc	82697231
K0S	H G Rhodes Inc	82766523
K0S	H G Rhodes Inc	82849204
K0S	H G Rhodes Inc	82784338
K0S	H G Rhodes Inc	82742906
K0S	H G Rhodes Inc	83054930
K0S	H G Rhodes Inc	82771706
K0S	H G Rhodes Inc	82779702
K0S	H G Rhodes Inc	83056869
K0S	H G Rhodes Inc	82871489
K0S	H G Rhodes Inc	83147506
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K0S	H G Rhodes Inc	82939098

K0S	H G Rhodes Inc	83111567
K0S	H G Rhodes Inc	82840158
K0S	H G Rhodes Inc	82903297
K0S	H G Rhodes Inc	82975895
K0S	H G Rhodes Inc	82905127
K0S	H G Rhodes Inc	82923484
K0S	H G Rhodes Inc	82859562
K0S	H G Rhodes Inc	83090445
K0S	H G Rhodes Inc	83109392
K0S	H G Rhodes Inc	82847412
K0S	H G Rhodes Inc	82983546
K0S	H G Rhodes Inc	82711981
K0S	H G Rhodes Inc	83197090
K0S	H G Rhodes Inc	83174314
K0S	H G Rhodes Inc	83181447
K0S	H G Rhodes Inc	82982792
K0S	H G Rhodes Inc	83040567
K0S	H G Rhodes Inc	82552970
K0S	H G Rhodes Inc	83172138
K0S	H G Rhodes Inc	82997570
K0S	H G Rhodes Inc	82996764
K0S	H G Rhodes Inc	82979851
K0S	H G Rhodes Inc	83106167
K0S	H G Rhodes Inc	83189669
K0S	H G Rhodes Inc	82864262
K0S	H G Rhodes Inc	83118376
K0S	H G Rhodes Inc	83121294
K0S	H G Rhodes Inc	83115963
K0S	H G Rhodes Inc	83081657
K0S	H G Rhodes Inc	83134082
K0S	H G Rhodes Inc	82740877
K0S	H G Rhodes Inc	82585685
K0S	H G Rhodes Inc	82476215
K0S	H G Rhodes Inc	82698001
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K0S	H G Rhodes Inc	83165457
K0S	H G Rhodes Inc	82610918
K0S	H G Rhodes Inc	82932051
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K0S	H G Rhodes Inc	82830989
K0S	H G Rhodes Inc	82964992
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K0S	H G Rhodes Inc	82659071
K0S	H G Rhodes Inc	82672354
K0S	H G Rhodes Inc	82726926
K0S	H G Rhodes Inc	82642551
K0S	H G Rhodes Inc	82716849
K0S	H G Rhodes Inc	82606405
K0S	H G Rhodes Inc	83055880
K0S	H G Rhodes Inc	83119974
K0S	H G Rhodes Inc	82667976
K0S	H G Rhodes Inc	82832309
K0S	H G Rhodes Inc	82970380
K0S	H G Rhodes Inc	82886691
K0S	H G Rhodes Inc	82873345
K0S	H G Rhodes Inc	82639028
K0S	H G Rhodes Inc	82657347

K0S	H G Rhodes Inc	82912290
K0S	H G Rhodes Inc	82873526
K0S	H G Rhodes Inc	83172333
K0S	H G Rhodes Inc	83135133
K0S	H G Rhodes Inc	82610933
K0S	H G Rhodes Inc	83027009
K0S	H G Rhodes Inc	82951187
K0S	H G Rhodes Inc	82718827
K0S	H G Rhodes Inc	82682965
K0S	H G Rhodes Inc	82863495
K0S	H G Rhodes Inc	83031493
K0S	H G Rhodes Inc	83209259
K0S	H G Rhodes Inc	82968907
K1D	J & A Auto Sales Llc	80805487
K1N	Mclarty Lrh Llc	80862066
K1S	Ec Auto Sales Llc	80969281
K2V	Rivard Auto Llc	84773752
K2V	Rivard Auto Llc	85394990
K2V	Rivard Auto Llc	85094568
K2V	Rivard Auto Llc	85055484
K2V	Rivard Auto Llc	84749728
K2V	Rivard Auto Llc	85347911
K2V	Rivard Auto Llc	84712404
K4N	Anne L Mitchan	79308223
K53	Cable Dahmer Chevrolet, Inc.	88313450
K5B	Flint Hill Autos, Llc	82873442
K6T	Shrader Wholesale Llc	83465636
K6T	Shrader Wholesale Llc	83458135
K6T	Shrader Wholesale Llc	83445287
K6T	Shrader Wholesale Llc	83449215
K7A	Hah Preowned Auto Outlet, Inc	85644163
K7N	Savers Auto Park Llc	80370068
K7N	Savers Auto Park Llc	80560042
K8S	Hayden Cars, Llc	80602129
K9K	City Motors Llc	84897827
K9U	Royal Classic Auto Sales, Inc.	82338198
K9U	Royal Classic Auto Sales, Inc.	81891074
K9U	Royal Classic Auto Sales, Inc.	81453662
KB5	James Ray Thomas Jr	82127545
KCJ	E-Z Auto Finance Inc	81651712
KDC	Charisma Motors Inc	81409909
KDC	Charisma Motors Inc	81076292
KDF	Credit Max Auto Sales Inc	83682404
KDH	Oklahoma Car Dealership, Llc	80608554
KDH	Oklahoma Car Dealership, Llc	80013433
KDK	Crown Eagle Autos Inc	84284537
KDK	Crown Eagle Autos Inc	84284537
KDR	Lamjay Llc	79783599
KDR	Lamjay Llc	80704231
KDZ	Autofinders Jpe, Llc	88688649
KGA	River Auto Sales Llc	83381077
KGA	River Auto Sales Llc	83323729
KGB	Friends And Family Automotive Llc	80725094
KHT	Jamil Imahdawi & Mahmoud Khalil	81733310
KHT	Jamil Imahdawi & Mahmoud Khalil	81625684
KHT	Jamil Imahdawi & Mahmoud Khalil	81513302
KHV	Asma S, Llc	82439155
KHV	Asma S, Llc	82389625
KHV	Asma S, Llc	82478680
KJK	Second Car City Inc	83199049
KJK	Second Car City Inc	83189818

KJK	Second Car City Inc	83479146
KJK	Second Car City Inc	82801081
KJK	Second Car City Inc	83258453
KJK	Second Car City Inc	83457227
KJQ	Philips Auto Sales Llc	82904749
KJQ	Philips Auto Sales Llc	84982694
KKG	Smiths Auto Sales Of Rimersburg Llc	81186231
KLL	Jo's Car Shack Inc	82410918
KMP	Mdj Grayson Enterprises Llc	81914260
KMP	Mdj Grayson Enterprises Llc	81972075
KMP	Mdj Grayson Enterprises Llc	82032102
KMR	Robin Cozad	80003377
KMV	Old School Cars Llc	82054825
KMV	Old School Cars Llc	82098415
KMV	Old School Cars Llc	82410736
KNJ	Appleby Automotive Group Llc	81677467
KNX	Mccoy Auto Group Inc	81644952
KNX	Mccoy Auto Group Inc	83047162
KPF	Texas Auto Savers, Inc.	83023670
KPF	Texas Auto Savers, Inc.	83004734
KQX	Deals On Wheels Auto Sales Llc	80608838
KQY	Hamilton Automotive Enterprises Llc	84276027
KQY	Hamilton Automotive Enterprises Llc	85289308
KSP	Adirondack Auto Sales & Service Inc	82488615
KSP	Adirondack Auto Sales & Service Inc	82274702
KSP	Adirondack Auto Sales & Service Inc	82289447
KTU	Coverallways Inc	84693018
KTX	Setayesh Inc.	83816935
KUX	Chariot Auto Sales Llc	80366351
KVA	Davit Shamatava	82218741
KVP	Major Motors Llc	88086601
KXC	Carlos Garcia	79587077
KXC	Carlos Garcia	81589085
KXC	Carlos Garcia	81589085
KXC	Carlos Garcia	81288459
KXC	Carlos Garcia	79516329
KXC	Carlos Garcia	81681307
KXH	Lemay Auto Group Inc	82033680
KXU	Oat Down, Llc	86320949
KXU	Oat Down, Llc	86141941
KYJ	Derick Sweet And Kelly Sweet	80361759
KZR	LI Glenn Road Llc	82410987
KZZ	Action Motors Inc.	79382512
L1H	Worldclass Motorsports Corp	80047863
L2N	Peruvian Motors Sales Inc	81710419
L2Z	Yaden's Auto Sales Inc	80879696
L2Z	Yaden's Auto Sales Inc	80879696
L3D	4u Auto Brokers Llc	80982254
L3D	4u Auto Brokers Llc	81636495
L3D	4u Auto Brokers Llc	81569442
L3D	4u Auto Brokers Llc	81862916
L3D	4u Auto Brokers Llc	81774074
L3D	4u Auto Brokers Llc	81403209
L3D	4u Auto Brokers Llc	81487812
L3D	4u Auto Brokers Llc	81702474
L3D	4u Auto Brokers Llc	81731163
L3D	4u Auto Brokers Llc	81603094
L3D	4u Auto Brokers Llc	81130201
L3D	4u Auto Brokers Llc	81157208

L3D	4u Auto Brokers Llc	81083860
L3D	4u Auto Brokers Llc	81741684
L4W	Amazing Auto Sales Llc	81560534
L5V	Suamico Investment Group Llc	82723708
L6C	Mouse Powersports Llc	90116363
L6H	Adams Auto Sales Llc	80043748
L6H	Adams Auto Sales Llc	80211922
L6H	Adams Auto Sales Llc	80495845
L6H	Adams Auto Sales Llc	80903589
L6H	Adams Auto Sales Llc	79849222
L6H	Adams Auto Sales Llc	80873948
L6H	Adams Auto Sales Llc	80567008
L6H	Adams Auto Sales Llc	81617662
L6H	Adams Auto Sales Llc	80290837
L6H	Adams Auto Sales Llc	81425453
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L6H	Adams Auto Sales Llc	81617662
L6H	Adams Auto Sales Llc	79279018
L6H	Adams Auto Sales Llc	81617662
L6H	Adams Auto Sales Llc	80872565
L6H	Adams Auto Sales Llc	81661850
L6X	S R Group Llc	83156903
L6X	S R Group Llc	85550632
L7B	Adams Distributing Llc	81329303
L7B	Adams Distributing Llc	81451991
L7M	Yassin Trading Auto Llc	84119404
L7M	Yassin Trading Auto Llc	84323507
L7M	Yassin Trading Auto Llc	86445347
L7M	Yassin Trading Auto Llc	87536802
L81	Carsplusnc.Com Llc	83051491
L85	A & J Auto Brokers Inc	84074526
L85	A & J Auto Brokers Inc	84280843
L85	A & J Auto Brokers Inc	84604005
L85	A & J Auto Brokers Inc	84245897
L85	A & J Auto Brokers Inc	84209284
L85	A & J Auto Brokers Inc	84798977
L85	A & J Auto Brokers Inc	84453850
L85	A & J Auto Brokers Inc	84380935
L89	Kelley A. Burke	80698623
L8Z	Neil Huffman Volkswagen Incorporated	81830067
L8Z	Neil Huffman Volkswagen Incorporated	81518178
L91	Super Autohaus Inc	81747648
L9A	E'zee Car Rental & Leasing, Inc.	80543185
L9A	E'zee Car Rental & Leasing, Inc.	80420888
L9A	E'zee Car Rental & Leasing, Inc.	81044618
L9A	E'zee Car Rental & Leasing, Inc.	80947717
L9K	Bowar & Sons Auto Inc	85055671
LBF	Priority Motorsports Llc	84943251
LBQ	Udrive Chicago Inc	81888955
LBQ	Udrive Chicago Inc	80197348
LBQ	Udrive Chicago Inc	81885055
LBQ	Udrive Chicago Inc	81645699
LCD	The Car Lot Llc	83895963
LCF	Elite Auto, Llc	81684507
LCJ	Willis Used Cars Llc	82452120
LCU	Alnasira Inc	81463216
LCU	Alnasira Inc	84040306
LCU	Alnasira Inc	84030538
LCU	Alnasira Inc	83825886

LCU	Alnasira Inc	84040306
LCU	Alnasira Inc	84030538
LCU	Alnasira Inc	83825886
LCV	Twins Auto Sales Inc	82231185
LCV	Twins Auto Sales Inc	82231185
LDB	Mountainside Auto Sales Inc	82701778
LDW	Good Used Autos Llc	81366038
LDX	Online Auto Wholesalers Llc	83924096
LDX	Online Auto Wholesalers Llc	83855297
LDX	Online Auto Wholesalers Llc	84051902
LDX	Online Auto Wholesalers Llc	84393940
LDX	Online Auto Wholesalers Llc	84247342
LDX	Online Auto Wholesalers Llc	84515240
LDX	Online Auto Wholesalers Llc	83901522
LDX	Online Auto Wholesalers Llc	84069227
LDX	Online Auto Wholesalers Llc	84637662
LDX	Online Auto Wholesalers Llc	84749017
LDX	Online Auto Wholesalers Llc	84777575
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LDX	Online Auto Wholesalers Llc	84214489
LDX	Online Auto Wholesalers Llc	83936616
LDX	Online Auto Wholesalers Llc	84793529
LDX	Online Auto Wholesalers Llc	84737627
LDX	Online Auto Wholesalers Llc	84249512
LDX	Online Auto Wholesalers Llc	84469749
LDX	Online Auto Wholesalers Llc	84064120
LF3	Miller Investments Group Inc	26589312
LFZ	Shailesh Patel	82425641
LG9	Formula Investments Inc	81719629
LGN	Prestige Auto Cars Llc	82386637
LGX	Killer Carz Ii Llc	83034205
LGX	Killer Carz Ii Llc	83172964
LGX	Killer Carz Ii Llc	83415311
LGX	Killer Carz Ii Llc	83389736
LGX	Killer Carz Ii Llc	82377966
LGX	Killer Carz Ii Llc	83189461
LH2	Trotter Auto Sales Llc	79894936
LHD	Chris Kelly	82222084
LJ2	Rick's Superior Service Inc	83473633
LJ5	Sandra Dickerson	82943118
LJG	United Auto Group Inc	81493361
LJG	United Auto Group Inc	81499092
LJG	United Auto Group Inc	80835922
LJG	United Auto Group Inc	81495788
LJG	United Auto Group Inc	80985862
LJG	United Auto Group Inc	80881076
LJG	United Auto Group Inc	81163821
LJG	United Auto Group Inc	80905452
LJG	United Auto Group Inc	81436884
LJG	United Auto Group Inc	81174304
LJG	United Auto Group Inc	81373588
LJG	United Auto Group Inc	81498299
LKH	Car Boss Llc	81191088
LKH	Car Boss Llc	81367394
LKH	Car Boss Llc	81306952
LKH	Car Boss Llc	81236578
LKN	Auto Images Sales & Service Llc	84706232
LL5	Liberty Automotive Group Llc	85908300
LLJ	B & D Autoz, Llc	82982142
LLJ	B & D Autoz, Llc	83497237
LLJ	B & D Autoz, Llc	83653656
LLJ	B & D Autoz, Llc	83157317

LLU	Cja Inc	80308827
LLU	Cja Inc	80107014
LM6	Jerry Willis Motors Llc	82074736
LM6	Jerry Willis Motors Llc	82092070
LMB	X600 Motorsport Llc	81349040
LMM	Gatewood Auto Sales Llc	82484727
LMM	Gatewood Auto Sales Llc	82892502
LMM	Gatewood Auto Sales Llc	82694627
LMM	Gatewood Auto Sales Llc	83730739
LMM	Gatewood Auto Sales Llc	83394027
LMM	Gatewood Auto Sales Llc	82456275
LMM	Gatewood Auto Sales Llc	83375698
LMM	Gatewood Auto Sales Llc	83226517
LMM	Gatewood Auto Sales Llc	83131029
LMM	Gatewood Auto Sales Llc	83157734
LMM	Gatewood Auto Sales Llc	83330461
LMM	Gatewood Auto Sales Llc	82892502
LMM	Gatewood Auto Sales Llc	82694627
LMM	Gatewood Auto Sales Llc	83071176
LMM	Gatewood Auto Sales Llc	83511303
LMM	Gatewood Auto Sales Llc	82718098
LMM	Gatewood Auto Sales Llc	82748229
LMM	Gatewood Auto Sales Llc	82318458
LMM	Gatewood Auto Sales Llc	83191978
LMM	Gatewood Auto Sales Llc	82757155
LMM	Gatewood Auto Sales Llc	82748229
LMU	Red Oak Transmission & Auto Sales Inc	86191895
LNW	Ofier Auto Sales Inc	81711695
LP3	Demone Daniels	80091895
LP3	Demone Daniels	79804943
LPX	Att Auto Llc	83147266
LPX	Att Auto Llc	83147266
LQ4	Tatiana Koptseva	83885570
LQ5	Miami International Autos Llc	82073143
LQG	Missouri Auto Group, Inc	80320490
LRC	Robert C Kehm; Charles M Mautner	81576101
LRQ	International Auto Distributors Llc	83575190
LRX	Fpr Used Auto Sales Llc	81958092
LRX	Fpr Used Auto Sales Llc	81927165
LRX	Fpr Used Auto Sales Llc	81855978
LRX	Fpr Used Auto Sales Llc	81816456
LRX	Fpr Used Auto Sales Llc	81772578
LRX	Fpr Used Auto Sales Llc	81756716
LRX	Fpr Used Auto Sales Llc	81389479
LRX	Fpr Used Auto Sales Llc	81525026
LRX	Fpr Used Auto Sales Llc	81488898
LRX	Fpr Used Auto Sales Llc	81458328
LRX	Fpr Used Auto Sales Llc	82003389
LSD	Cisco's Performance Center Inc	80885051
LT1	Xtreme Lil Boyz Toyz Llc	81597963
LT5	Independence Family Autocenter Inc	82439181
LT5	Independence Family Autocenter Inc	82439181
LT6	Show & Go Auto Repair & Sales Inc	83638711
LTG	Carolina Autoimotive Of Columbia Llc	82699837
LTG	Carolina Autoimotive Of Columbia Llc	82669977
LTG	Carolina Autoimotive Of Columbia Llc	82715514
LTG	Carolina Autoimotive Of Columbia Llc	82766053
LTR	Rachel Angerbrandt & Angela Hurst	80651854

LU6	Auto Source Llc	82030576
LU8	Fleetwood Motors Llc	80966625
LU8	Fleetwood Motors Llc	81344802
LU8	Fleetwood Motors Llc	81177181
LU8	Fleetwood Motors Llc	81235669
LU8	Fleetwood Motors Llc	80882230
LU8	Fleetwood Motors Llc	81274479
LU8	Fleetwood Motors Llc	81395729
LU8	Fleetwood Motors Llc	81279975
LUA	Delacy Automotive Inc	83095070
LUV	Palm Beach Auto Direct Corp	84929910
LUV	Palm Beach Auto Direct Corp	85106619
LV3	Automania Of Tampa Llc	83194680
LV3	Automania Of Tampa Llc	83221766
LV4	Trust Auto Inc	82128592
LVK	Kin Folk Investment Corporation	82332121
LVW	Currie Motors Auto Credit Indiana Llc	82516573
LW4	Sean Dunham	80497966
LX5	Kc Trend Auto Llc	80542642
LXD	Arkansas Used Auto Dealer Llc	81003757
LXJ	Chase Car Sales And Leasing Inc	82589899
LXJ	Chase Car Sales And Leasing Inc	82424560
LXJ	Chase Car Sales And Leasing Inc	82631522
LXJ	Chase Car Sales And Leasing Inc	82415458
LXJ	Chase Car Sales And Leasing Inc	82647395
LXJ	Chase Car Sales And Leasing Inc	82547397
LXJ	Chase Car Sales And Leasing Inc	82538967
LXQ	Sandoval Buick Gmc Inc	83558474
LZ1	The Car Hub Llc	81383721
LZ1	The Car Hub Llc	81821546
LZ1	The Car Hub Llc	81769200
LZ1	The Car Hub Llc	82468788
LZ1	The Car Hub Llc	82406172
LZ1	The Car Hub Llc	81905370
LZ1	The Car Hub Llc	82548278
LZ1	The Car Hub Llc	82446117
LZ1	The Car Hub Llc	82643871
LZ1	The Car Hub Llc	82332000
LZ1	The Car Hub Llc	82136512
LZ1	The Car Hub Llc	82354514
LZ1	The Car Hub Llc	82335269
LZ1	The Car Hub Llc	82186401
LZ1	The Car Hub Llc	82251344
LZ1	The Car Hub Llc	81940995
LZ1	The Car Hub Llc	81940181
LZ1	The Car Hub Llc	81810103
LZ1	The Car Hub Llc	81679558
LZ1	The Car Hub Llc	81622040
LZ1	The Car Hub Llc	82469121
LZ1	The Car Hub Llc	82335754
LZ4	Lincoln Auto Inc	80596138
M0D	Ron's Towing & Recovery Automotive Llc	82465563
M0D	Ron's Towing & Recovery Automotive Llc	82011355
M0D	Ron's Towing & Recovery Automotive Llc	82046636
M1D	Torres Auto Sales Inc	80768401
M1D	Torres Auto Sales Inc	80675432
M1M	Kaw Valley Industrial Inc	82284901

M2D	Dennis Drummond & Alyson Eden	81899593
M3M	Shel-Line Auto Sales Llc	82007165
M3M	Shel-Line Auto Sales Llc	81680716
M3M	Shel-Line Auto Sales Llc	81656292
M3M	Shel-Line Auto Sales Llc	81662055
M3M	Shel-Line Auto Sales Llc	81582256
M3M	Shel-Line Auto Sales Llc	81422190
M4U	Briggs Auto Group Inc	82341964
M4Z	Powatoy Of Laredo Inc	84403782
M5B	Mojibullah Zemarialai	80416629
M5L	Mass Best Motors Inc	82471163
M5P	Driver Seat Auto Sales Llc	83027312
M7A	H & H Automotive Sales & Service, Llc	84088261
M7G	Cars Cars Cars Llc	80901177
M7R	Aq Llc	81832278
M7R	Aq Llc	83152045
M7R	Aq Llc	82378167
M7R	Aq Llc	84591348
M7R	Aq Llc	84759330
M7R	Aq Llc	84758652
M7R	Aq Llc	85235058
M7R	Aq Llc	85152774
M7R	Aq Llc	84693217
M7R	Aq Llc	84615926
M7R	Aq Llc	85106375
M7Z	Autodeals Me Llc	82375756
M7Z	Autodeals Me Llc	83857006
M7Z	Autodeals Me Llc	88495623
M7Z	Autodeals Me Llc	88347663
M8B	Airport Auto Group Llc	82577055
M8C	Kegs Limited	80467248
M8C	Kegs Limited	80700400
M8C	Kegs Limited	80383320
M8C	Kegs Limited	80654297
M9D	Northeast Georgia Automotive Sales & Finance Llc	84482861
M9H	Manuel Garcia	82312822
M9H	Manuel Garcia	82274927
M9H	Manuel Garcia	82337589
M9H	Manuel Garcia	81791145
M9H	Manuel Garcia	82585013
M9H	Manuel Garcia	81661817
M9H	Manuel Garcia	82455726
M9H	Manuel Garcia	82032055
M9H	Manuel Garcia	81670523
M9H	Manuel Garcia	81979070
M9H	Manuel Garcia	82239931
M9H	Manuel Garcia	82438195
M9H	Manuel Garcia	82594665
M9H	Manuel Garcia	82042712
M9H	Manuel Garcia	81649375
M9H	Manuel Garcia	81883669
M9H	Manuel Garcia	82610488
M9H	Manuel Garcia	82326020
M9M	Rimo Auto Sales Inc	83154364
M9Q	Atlantic Auto Group Llc	82899002
M9Q	Atlantic Auto Group Llc	83376326
M9Q	Atlantic Auto Group Llc	84055464
MAJ	Flower City Truck And Auto Inc	81786099
MBK	Premier Used Cars Llc	84046529
MBL	Superman Auto Sales Llc	83803014
MBL	Superman Auto Sales Llc	80966215

MBL	Superman Auto Sales Llc	84514850
MBL	Superman Auto Sales Llc	84302366
MBL	Superman Auto Sales Llc	84111013
MBL	Superman Auto Sales Llc	84041156
MBL	Superman Auto Sales Llc	84021941
MBL	Superman Auto Sales Llc	84346691
MBL	Superman Auto Sales Llc	84303833
MBP	Mac Motors Llc	82643077
MBP	Mac Motors Llc	81610885
MBS	Platinum Wholesalers Llc	82052456
MBS	Platinum Wholesalers Llc	83022835
MBS	Platinum Wholesalers Llc	83324765
MBS	Platinum Wholesalers Llc	82759998
MBS	Platinum Wholesalers Llc	82690863
MBS	Platinum Wholesalers Llc	83107583
MBS	Platinum Wholesalers Llc	83154877
MBS	Platinum Wholesalers Llc	83198799
MBS	Platinum Wholesalers Llc	82532111
MBS	Platinum Wholesalers Llc	83261375
MCF	Auto Quest Llc	80642416
MCK	Baucom Motors, Llc	81365861
MCK	Baucom Motors, Llc	81390946
MDR	Mohamad Jalal Shreim	86271704
MDR	Mohamad Jalal Shreim	85913035
MDX	Howse Auto Credit Llc	81471217
MDX	Howse Auto Credit Llc	81342000
MHB	Auto King Llc	82084782
MHB	Auto King Llc	82482685
MHH	Kelvin Vamper	81016172
MHH	Kelvin Vamper	81878857
MKL	Harvey Auto Credit Llc	83820810
MKN	Americar Mtr Llc	83126457
MKU	Dgmotorwerks Llc	85837176
MKV	Marion Milam	83526438
MKV	Marion Milam	84102379
MKV	Marion Milam	84105686
MLH	Assist To Sell Autos, Llc	82560172
MLH	Assist To Sell Autos, Llc	81890218
MLP	Billy Gerald Hill	85411153
MLP	Billy Gerald Hill	85423481
MLP	Billy Gerald Hill	85334539
MLP	Billy Gerald Hill	85789183
MLP	Billy Gerald Hill	85528988
MLP	Billy Gerald Hill	85425280
MLP	Billy Gerald Hill	85711874
MLP	Billy Gerald Hill	85559469
MLP	Billy Gerald Hill	85947180
MLP	Billy Gerald Hill	85993653
MLP	Billy Gerald Hill	85995136
MLP	Billy Gerald Hill	85994224
MLP	Billy Gerald Hill	86070188
MLP	Billy Gerald Hill	85992981
MLP	Billy Gerald Hill	85965404
MLP	Billy Gerald Hill	86068817
MLP	Billy Gerald Hill	86034738
MLP	Billy Gerald Hill	85931435
MLP	Billy Gerald Hill	85354973
MLP	Billy Gerald Hill	85279726
MLP	Billy Gerald Hill	86145859
MLP	Billy Gerald Hill	86117289
MMV	Lakeview Auto Llc	82972978
MNB	Kas 2, Inc	83575335

MNB	Kas 2, Inc	81381840
MNG	Dean M. Lake	81039483
MNG	Dean M. Lake	80990759
MNG	Dean M. Lake	81006462
MNG	Dean M. Lake	81018827
MNG	Dean M. Lake	81026390
MNU	7 Auto Sales Hp Llc	82396822
MNU	7 Auto Sales Hp Llc	84880407
MQS	Grant S. Lilly Ent Pre-Owned Auto Sales Llc	81018741
MQS	Grant S. Lilly Ent Pre-Owned Auto Sales Llc	81524275
MRL	Larry Burris Sr	80394237
MRL	Larry Burris Sr	80421925
MRV	Christina Vicedomini	81881348
MRV	Christina Vicedomini	81866571
MSA	Affordable Auto Mart Llc	81538280
MSF	A & S Autosales Llc	83759084
MSW	A-1 Auto Group Llc	80739895
MTA	Roper Frost Llc	90866951
MTF	Victory Lane Auto Llc	82232319
MTN	Car 1 Llc	81435557
MTZ	Jamal Alquzweeni	81786434
MTZ	Jamal Alquzweeni	81859347
MTZ	Jamal Alquzweeni	81594132
MTZ	Jamal Alquzweeni	81545120
MTZ	Jamal Alquzweeni	82050010
MTZ	Jamal Alquzweeni	81945755
MTZ	Jamal Alquzweeni	81546565
MTZ	Jamal Alquzweeni	81735018
MUN	Berns Auto Sales Inc	81925302
MVB	Troy Kitt Brazelton	87887314
MVC	Golden Gate Automotive Llc	82050020
MVC	Golden Gate Automotive Llc	81374226
MVK	Credit Max Auto Sales Inc	84187366
MVU	Pledge 5 Foundation Inc	81265419
MWW	Stanford Motor Vehicles Llc	82223805
MWW	Stanford Motor Vehicles Llc	82579973
MWW	Stanford Motor Vehicles Llc	82622961
MWW	Stanford Motor Vehicles Llc	82638666
MWW	Stanford Motor Vehicles Llc	82349297
MWW	Stanford Motor Vehicles Llc	82290750
MYB	The Noguera Group Inc	81884126
MYB	The Noguera Group Inc	81395232
MYB	The Noguera Group Inc	81395232
MYB	The Noguera Group Inc	81786555
MYB	The Noguera Group Inc	82040783
MYB	The Noguera Group Inc	81819363
MYB	The Noguera Group Inc	82226442
MYB	The Noguera Group Inc	81724602
MYB	The Noguera Group Inc	81647066
MYC	Paul Parrott	81351083
MYS	Keith And Brian Enterprises Llc	88330376
MZR	Missouri Motors Llc	83949030
N0K	Rock Hill Motor Company Llc	82890866
N0K	Rock Hill Motor Company Llc	82765780
N0V	Wholesale Direct Of St Joseph, Llc	81651124
N0V	Wholesale Direct Of St Joseph, Llc	85839557
N0V	Wholesale Direct Of St Joseph, Llc	85839557
N0X	John Cragg	89165185
N0X	John Cragg	92973091
N1M	I-Auto Partners Inc	85795540

N1X	Cowtown Autoplex Llc	84754654
N1X	Cowtown Autoplex Llc	84732953
N3M	Capital Auto Sales Llc	82296669
N3M	Capital Auto Sales Llc	84569089
N3M	Capital Auto Sales Llc	81834010
N3P	Kevin L Robbins	83766204
N3Q	414 Motor Cars Llc	80785232
N57	Fernando Mariscal	82371632
N59	Rite Touch Auto Sales Llc	81296080
N5F	Truckin Auto Sales Inc	84431911
N5F	Truckin Auto Sales Inc	84426050
N5J	Elda Renteria & Eleazar Renteria	80518879
N6H	Baye Auto Sales Llc	82216082
N6H	Baye Auto Sales Llc	83259126
N6H	Baye Auto Sales Llc	82797359
N6H	Baye Auto Sales Llc	82773175
N6H	Baye Auto Sales Llc	83275572
N6Q	Bikes Boats & Bimmers Llc	83427271
N6Q	Bikes Boats & Bimmers Llc	83538651
N6Q	Bikes Boats & Bimmers Llc	83441497
N6U	Need A Car Buy A Car Llc	88116687
N75	Best Buy Auto Trade Inc	82097036
N78	Prestige Auto Sales Llc	81501539
N7N	Parson's Automotive Inc	84319862
N81	Good Cents Auto Sales Llc	80847019
N87	Landers Management Inc	81792845
N8L	5 Towns Drive Inc	81921379
N9U	Charles Bibbs	81836972
NAD	Us Fleet Liquidators Llc	81227547
NAD	Us Fleet Liquidators Llc	81215640
NAD	Us Fleet Liquidators Llc	81424819
NAG	Peggy's Auto Sales Inc	91014733
NAU	J Benton Enterprises Llc	88194340
NAU	J Benton Enterprises Llc	88017105
NAU	J Benton Enterprises Llc	88166299
NAU	J Benton Enterprises Llc	88304705
NAU	J Benton Enterprises Llc	88304424
NAU	J Benton Enterprises Llc	88289890
NAU	J Benton Enterprises Llc	88312943
NAV	Advantage Auto Sales Llc	82327698
NAW	Platinum Automotive Llc	82882213
NAW	Platinum Automotive Llc	82979368
NAW	Platinum Automotive Llc	83033463
NAW	Platinum Automotive Llc	83248038
NAW	Platinum Automotive Llc	83334906
NAW	Platinum Automotive Llc	83181132
NAW	Platinum Automotive Llc	83522220
NAW	Platinum Automotive Llc	83169480
NAW	Platinum Automotive Llc	83468498
NAW	Platinum Automotive Llc	83319725
NAW	Platinum Automotive Llc	83320914
NAW	Platinum Automotive Llc	83449172
NAW	Platinum Automotive Llc	83510914
NBF	Auto Kingdom Llc	82948947
NCB	The Wright Way Investment Group Llc	84990775
NCB	The Wright Way Investment Group Llc	84929266
NCF	S & M Motors Inc	82124775
NCF	S & M Motors Inc	82780678
NCF	S & M Motors Inc	82701502
NCV	Jcbrown Properties, Llc	82175145
NCV	Jcbrown Properties, Llc	82066515

NCV	Jcbrown Properties, Llc	81868740
NCV	Jcbrown Properties, Llc	82520575
NCV	Jcbrown Properties, Llc	82550523
NCV	Jcbrown Properties, Llc	82431623
NCV	Jcbrown Properties, Llc	82367421
NCV	Jcbrown Properties, Llc	82343827
NCV	Jcbrown Properties, Llc	82183962
NCV	Jcbrown Properties, Llc	82052702
NCV	Jcbrown Properties, Llc	81992125
NCV	Jcbrown Properties, Llc	81956289
NCV	Jcbrown Properties, Llc	81884994
NCV	Jcbrown Properties, Llc	81823027
NCV	Jcbrown Properties, Llc	82507193
NCV	Jcbrown Properties, Llc	82236812
NDN	Victoria Auto Sales Llc	81389287
NDN	Victoria Auto Sales Llc	82418706
NFF	Kent Walker	81025323
NFF	Kent Walker	80767045
NFF	Kent Walker	81114165
NFF	Kent Walker	80811544
NFY	Bill Snethkamp Inc	85612658
NG3	Shore Auto Of Nj Corp	85029579
NGF	R Kids Auto Group Llc	81011113
NGF	R Kids Auto Group Llc	81345960
NGF	R Kids Auto Group Llc	81065826
NGF	R Kids Auto Group Llc	81108367
NGG	Drivenowlouisville.Com Auto Sales Llc	81510490
NGG	Drivenowlouisville.Com Auto Sales Llc	81437486
NGM	Uptown Auto Group Inc	82222936
NH9	Liccardi Ford Inc	84734539
NJ3	Dock Auto Llc	83792540
NJ3	Dock Auto Llc	84020232
NJ7	Robert L Taylor	81797304
NJD	Frye Auto Sales Llc	83271110
NJD	Frye Auto Sales Llc	83115513
NJT	Gordon Automotive Llc	83944164
NJW	Mark Miraglia Associates Inc	81582535
NJW	Mark Miraglia Associates Inc	81484403
NJW	Mark Miraglia Associates Inc	81420410
NJZ	Cordial Auto Brokers, Llc	85029116
NJZ	Cordial Auto Brokers, Llc	85210971
NK6	Dahid Auto Sales Llc	84092196
NKB	Kar Sales Llc	84002574
NKM	Hoosier Auto Llc	81910903
NKM	Hoosier Auto Llc	81721760
NKP	Hrg Automotive Llc	85705150
NKW	Dave & Nancy Preucil Inc	82807676
NL9	Mlb Investments Inc.	81187823
NLG	Affordable Auto Sales Of Hallandale Beach Inc	82900472
NLG	Affordable Auto Sales Of Hallandale Beach Inc	82855947
NLP	Del Mar Auto Center Inc	81945959
NLY	Car Connection Auto Sales Llc	83891927
NM4	Just Drive One Llc	83456669
NMG	Great Deals Auto Group Llc	81676823
NMG	Great Deals Auto Group Llc	81183670
NMG	Great Deals Auto Group Llc	81255834
NMG	Great Deals Auto Group Llc	81886757
NMG	Great Deals Auto Group Llc	81409957
NMG	Great Deals Auto Group Llc	81613955
NMG	Great Deals Auto Group Llc	81293096
NMG	Great Deals Auto Group Llc	81742677

NMG	Great Deals Auto Group Llc	81516152
NMG	Great Deals Auto Group Llc	81189549
NMG	Great Deals Auto Group Llc	81497295
NMG	Great Deals Auto Group Llc	81497295
NMG	Great Deals Auto Group Llc	81635320
NMW	Lake City Motors Of Florida Llc	81825942
NNF	Walden Auto Sales Llc	82233980
NNF	Walden Auto Sales Llc	83245238
NNP	Best Price, Inc	82375087
NNQ	United Motors Inc	81855565
NPF	Christopher M Moerler	82003683
NPK	Auto Globe Inc	82677024
NPK	Auto Globe Inc	82261808
NPP	Er Auto Sales And Rentals, Inc	81481976
NPX	Designer Auto Sport Of Massapequa Inc	83477660
NQX	Greenway Automotive Llc	81346361
NRA	Palo Verde Motors Inc.	81142314
NRA	Palo Verde Motors Inc.	84234006
NRF	Miracle Business Group Llc	81750046
NRF	Miracle Business Group Llc	81804726
NRF	Miracle Business Group Llc	81520146
NSG	Mario Lopez & Alicia Lopez- Gomez	81554673
NSL	Jon Barnett	83488007
NSQ	Unique Motors Inc	81856624
NSY	Reliable Auto Sales Llc	81965964
NSY	Reliable Auto Sales Llc	81960824
NSY	Reliable Auto Sales Llc	81999696
NTG	Top Choice Auto Llc	84185713
NTG	Top Choice Auto Llc	84635534
NTL	Cars & Trucks Group Llc	81519120
NTL	Cars & Trucks Group Llc	82294656
NTL	Cars & Trucks Group Llc	83413777
NTL	Cars & Trucks Group Llc	82788595
NTL	Cars & Trucks Group Llc	82742708
NTL	Cars & Trucks Group Llc	83305472
NTL	Cars & Trucks Group Llc	82716168
NTL	Cars & Trucks Group Llc	83150898
NTL	Cars & Trucks Group Llc	82602300
NTL	Cars & Trucks Group Llc	82821304
NTL	Cars & Trucks Group Llc	82344519
NTL	Cars & Trucks Group Llc	82573558
NTL	Cars & Trucks Group Llc	83089739
NTL	Cars & Trucks Group Llc	82493859
NTL	Cars & Trucks Group Llc	83035172
NTL	Cars & Trucks Group Llc	82384285
NTL	Cars & Trucks Group Llc	82213285
NTL	Cars & Trucks Group Llc	82648196
NTL	Cars & Trucks Group Llc	83268288
NTL	Cars & Trucks Group Llc	83207335
NUF	Auto Genius Of Indiana Llc	82480543
NUF	Auto Genius Of Indiana Llc	82011620
NUP	Bartell Automotive Group Llc	85086219
NUP	Bartell Automotive Group Llc	85241830
NUP	Bartell Automotive Group Llc	85293297
NVH	Bafa Motors Llc	84377327
NVV	Falls Church Autos Llc	81475503
NVV	Falls Church Autos Llc	81483360
NVV	Falls Church Autos Llc	81466851
NWX	Palmeto Auto Of Horry Llc	83852388
NWX	Palmeto Auto Of Horry Llc	83726519
NWX	Palmeto Auto Of Horry Llc	83768192

NWX	Palmeto Auto Of Horry Llc	81095833
NWZ	Brothers Auto Sales Llc	83003992
NWZ	Brothers Auto Sales Llc	83204651
NWZ	Brothers Auto Sales Llc	83758420
NWZ	Brothers Auto Sales Llc	83327913
NWZ	Brothers Auto Sales Llc	84030094
NWZ	Brothers Auto Sales Llc	84101759
NWZ	Brothers Auto Sales Llc	84157482
NWZ	Brothers Auto Sales Llc	83713265
NXG	International Auto Mall & Leasing Center Inc	84754831
NXG	International Auto Mall & Leasing Center Inc	84599085
NXW	Rgjl-4 Inc	81301643
NY0	Derby Llc	81286181
NY5	Maquoketa Ford Inc	86941466
NY9	Rd's Auto Llc	81607641
NY9	Rd's Auto Llc	81083130
NYP	Nova Certified Autos Inc	81866050
NYT	Skyy Motors Used Car Dealership Corporation	82210843
NYT	Skyy Motors Used Car Dealership Corporation	82422577
NYT	Skyy Motors Used Car Dealership Corporation	82398389
NYT	Skyy Motors Used Car Dealership Corporation	82370477
NYT	Skyy Motors Used Car Dealership Corporation	82407326
NYT	Skyy Motors Used Car Dealership Corporation	82287104
NYX	One Stop Marketing Llc	81391789
NYX	One Stop Marketing Llc	81639240
NYX	One Stop Marketing Llc	80992762
NYX	One Stop Marketing Llc	81508554
NYX	One Stop Marketing Llc	81450869
NYX	One Stop Marketing Llc	80913661
NZ0	Momentum Motor Group Llc	85551185
NZ0	Momentum Motor Group Llc	86544725
NZF	Car Connection Inc	82472404
NZF	Car Connection Inc	82468560
NZF	Car Connection Inc	83169452
NZF	Car Connection Inc	83220155
NZF	Car Connection Inc	82979074
NZF	Car Connection Inc	82610974
NZS	Nass Auto Trading Llc	86781040
O54	C H.T , Inc	77675153
P0S	Gns Classic And Used Autos Llc	81942168
P0S	Gns Classic And Used Autos Llc	82943247
P0S	Gns Classic And Used Autos Llc	82765455
P0S	Gns Classic And Used Autos Llc	82369681
P1D	Lifestyle Motors Llc	83351483
P1D	Lifestyle Motors Llc	83465189
P1D	Lifestyle Motors Llc	83638293
P2B	Carfirst Llc	83761686
P2H	Jw Auto Brokers Llc	83639173
P2H	Jw Auto Brokers Llc	83321592
P2H	Jw Auto Brokers Llc	83705561
P2H	Jw Auto Brokers Llc	84172250
P2H	Jw Auto Brokers Llc	84100901
P2H	Jw Auto Brokers Llc	84065893
P2H	Jw Auto Brokers Llc	83988697
P2H	Jw Auto Brokers Llc	83848242
P2H	Jw Auto Brokers Llc	83835211
P2H	Jw Auto Brokers Llc	83821693
P2H	Jw Auto Brokers Llc	83813456

P2H	Jw Auto Brokers Llc	83813605
P2H	Jw Auto Brokers Llc	83781426
P2H	Jw Auto Brokers Llc	83755377
P2H	Jw Auto Brokers Llc	83704518
P2H	Jw Auto Brokers Llc	83801161
P2H	Jw Auto Brokers Llc	83726099
P2S	Sherry Morris	81718426
P2S	Sherry Morris	82208327
P2S	Sherry Morris	81578906
P2S	Sherry Morris	82740229
P3G	Greg Mosley	83198035
P3G	Greg Mosley	83003597
P3G	Greg Mosley	83198035
P3G	Greg Mosley	82518135
P3G	Greg Mosley	83095820
P3G	Greg Mosley	82749910
P3G	Greg Mosley	82542076
P3G	Greg Mosley	83306216
P3G	Greg Mosley	83614834
P3G	Greg Mosley	83440737
P3G	Greg Mosley	83439006
P3G	Greg Mosley	83434820
P3G	Greg Mosley	83437183
P3G	Greg Mosley	83337276
P3G	Greg Mosley	83363306
P3G	Greg Mosley	83333922
P3G	Greg Mosley	83282721
P3G	Greg Mosley	83314707
P3G	Greg Mosley	83305131
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P3G	Greg Mosley	83266514
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P3G	Greg Mosley	83235094
P3G	Greg Mosley	83199418
P3G	Greg Mosley	83216547
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P3G	Greg Mosley	82858140
P3G	Greg Mosley	82765906
P3G	Greg Mosley	82794553
P3G	Greg Mosley	83129048
P3Q	John & Brandy Williams	81550626
P3Q	John & Brandy Williams	81634284
P3Q	John & Brandy Williams	81564913
P3Q	John & Brandy Williams	81313005
P3Q	John & Brandy Williams	81228644
P3Q	John & Brandy Williams	81179921
P3Q	John & Brandy Williams	81072934
P3Q	John & Brandy Williams	81519104
P3Q	John & Brandy Williams	81537570
P3Q	John & Brandy Williams	81583264
P3Q	John & Brandy Williams	81546653
P4M	Seneca Motors Llc	81128422
P4U	Prime Auto Group Inc	85979445
P5H	S & J Autos Llc	84565354

P5H	S & J Autos Llc	84805045
P5H	S & J Autos Llc	84384649
P5H	S & J Autos Llc	84943424
P5H	S & J Autos Llc	84772550
P5H	S & J Autos Llc	85532425
P5W	Colonial Motors Llc	87192311
P5Y	Next Phase Auto Sales Llc	81861583
P5Y	Next Phase Auto Sales Llc	81743670
P5Y	Next Phase Auto Sales Llc	81791235
P5Y	Next Phase Auto Sales Llc	81979247
P5Y	Next Phase Auto Sales Llc	82162147
P5Y	Next Phase Auto Sales Llc	82067313
P5Y	Next Phase Auto Sales Llc	81998606
P5Y	Next Phase Auto Sales Llc	82078651
P5Y	Next Phase Auto Sales Llc	82098343
P5Y	Next Phase Auto Sales Llc	82054377
P5Y	Next Phase Auto Sales Llc	82011877
P5Y	Next Phase Auto Sales Llc	81883675
P5Y	Next Phase Auto Sales Llc	81897480
P5Y	Next Phase Auto Sales Llc	81774940
P5Y	Next Phase Auto Sales Llc	81799932
P5Y	Next Phase Auto Sales Llc	81743620
P5Y	Next Phase Auto Sales Llc	82200318
P5Y	Next Phase Auto Sales Llc	82089562
P5Y	Next Phase Auto Sales Llc	81966646
P5Y	Next Phase Auto Sales Llc	82072067
P5Y	Next Phase Auto Sales Llc	82024914
P5Y	Next Phase Auto Sales Llc	82007005
P5Y	Next Phase Auto Sales Llc	81878030
P5Y	Next Phase Auto Sales Llc	81799964
P5Z	Rays Auto Inc	84398802
P5Z	Rays Auto Inc	84373289
P6J	William Saleh	81680125
P6V	Muncie Reliable Auto Sales Llc	85096468
P6V	Muncie Reliable Auto Sales Llc	85278916
P6V	Muncie Reliable Auto Sales Llc	85172317
P6V	Muncie Reliable Auto Sales Llc	84986695
P6V	Muncie Reliable Auto Sales Llc	85293650
P7H	Fresh Start Auto Sales And Service Llc	85892311
P7H	Fresh Start Auto Sales And Service Llc	86039866
P7K	V Auto Sales Llc	81149336
P7R	Louis Armenta	81571172
P7R	Louis Armenta	81733491
P7R	Louis Armenta	81420759
P7R	Louis Armenta	81624726
P7R	Louis Armenta	81636010
P7R	Louis Armenta	81553272
P7Z	Blue Nile Auto Inc	81625486
P7Z	Blue Nile Auto Inc	81399139
P7Z	Blue Nile Auto Inc	81335927
P7Z	Blue Nile Auto Inc	81269458
P8A	Advantage Motorcars Inc	81229276
P8B	Gulfside Motors Llc	82677326
P8B	Gulfside Motors Llc	82336995
P8B	Gulfside Motors Llc	82295855
P8B	Gulfside Motors Llc	82817054
P8B	Gulfside Motors Llc	82169296
P8B	Gulfside Motors Llc	82273808
P8B	Gulfside Motors Llc	82026683
P8B	Gulfside Motors Llc	82022195
P8B	Gulfside Motors Llc	81994236

P8B	Gulfside Motors Llc	82401022
P8B	Gulfside Motors Llc	82604169
P8B	Gulfside Motors Llc	82706676
P8B	Gulfside Motors Llc	82298124
P8B	Gulfside Motors Llc	82043722
P8B	Gulfside Motors Llc	82028787
P8B	Gulfside Motors Llc	82849036
P8B	Gulfside Motors Llc	82393625
P8B	Gulfside Motors Llc	82441431
P8B	Gulfside Motors Llc	82820244
P8B	Gulfside Motors Llc	82425440
P8B	Gulfside Motors Llc	82963104
P8B	Gulfside Motors Llc	82942414
P8B	Gulfside Motors Llc	82857606
P8B	Gulfside Motors Llc	82849317
P8B	Gulfside Motors Llc	83002484
P8B	Gulfside Motors Llc	82830100
P8B	Gulfside Motors Llc	82885507
P8B	Gulfside Motors Llc	82317337
P8B	Gulfside Motors Llc	83093972
P8B	Gulfside Motors Llc	83116127
P8B	Gulfside Motors Llc	82531824
P8B	Gulfside Motors Llc	82239466
P8B	Gulfside Motors Llc	82736378
P8B	Gulfside Motors Llc	83001753
P8K	Consumer 1st Auto Group Llc	83585629
P8T	Brian K Lawson	88644004
P8W	Ez Finance Auto Sales Inc	81573912
P8W	Ez Finance Auto Sales Inc	81783096
P9F	Car Access Inc	83244029
P9J	Ltp Used Auto Sales Llc	82060949
P9J	Ltp Used Auto Sales Llc	82218299
P9J	Ltp Used Auto Sales Llc	82266297
P9J	Ltp Used Auto Sales Llc	82327850
P9J	Ltp Used Auto Sales Llc	81922194
P9J	Ltp Used Auto Sales Llc	81709093
P9J	Ltp Used Auto Sales Llc	82618736
P9P	Auto Option Llc	81283612
P9P	Auto Option Llc	81744883
P9P	Auto Option Llc	81913351
P9P	Auto Option Llc	81190080
P9P	Auto Option Llc	81902013
P9P	Auto Option Llc	81581085
P9P	Auto Option Llc	81301767
P9P	Auto Option Llc	81633617
P9P	Auto Option Llc	81561501
P9P	Auto Option Llc	81705149
P9P	Auto Option Llc	81644989
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P9P	Auto Option Llc	82077515
P9P	Auto Option Llc	81974179
P9P	Auto Option Llc	82053711
P9P	Auto Option Llc	81781517
P9P	Auto Option Llc	81734691
P9P	Auto Option Llc	81738046
P9P	Auto Option Llc	81737574
P9P	Auto Option Llc	81479409
P9P	Auto Option Llc	81252968
P9P	Auto Option Llc	81365069
P9P	Auto Option Llc	81266287

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P9P	Auto Option Llc	81632058
P9P	Auto Option Llc	82002268
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P9P	Auto Option Llc	82069316
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P9P	Auto Option Llc	81887866
P9P	Auto Option Llc	81641919
P9P	Auto Option Llc	81674323
P9Z	Kar City, Llc	82421844
P9Z	Kar City, Llc	82213912
P9Z	Kar City, Llc	82563638
P9Z	Kar City, Llc	82305167
P9Z	Kar City, Llc	81939494
P9Z	Kar City, Llc	81953475
P9Z	Kar City, Llc	82693189
P9Z	Kar City, Llc	82098198
P9Z	Kar City, Llc	82032764
P9Z	Kar City, Llc	81926305
P9Z	Kar City, Llc	82931803
P9Z	Kar City, Llc	82351938
P9Z	Kar City, Llc	82120981
P9Z	Kar City, Llc	82667623
P9Z	Kar City, Llc	82525243
P9Z	Kar City, Llc	82506564
P9Z	Kar City, Llc	82756619
P9Z	Kar City, Llc	82462356
P9Z	Kar City, Llc	82927788
P9Z	Kar City, Llc	82883229
P9Z	Kar City, Llc	82768987
P9Z	Kar City, Llc	82089583
P9Z	Kar City, Llc	83055050
P9Z	Kar City, Llc	82891121
P9Z	Kar City, Llc	83075833
P9Z	Kar City, Llc	82989175
P9Z	Kar City, Llc	83026081
P9Z	Kar City, Llc	83027308
P9Z	Kar City, Llc	83028632
P9Z	Kar City, Llc	82944432
P9Z	Kar City, Llc	82961683
P9Z	Kar City, Llc	82946787
P9Z	Kar City, Llc	82716005
P9Z	Kar City, Llc	82693696
P9Z	Kar City, Llc	82465713
P9Z	Kar City, Llc	82426333
P9Z	Kar City, Llc	82491379
P9Z	Kar City, Llc	82453615
P9Z	Kar City, Llc	83085385
P9Z	Kar City, Llc	82559304
PAT	Auto Center Of Greer Llc	84103742
PAT	Auto Center Of Greer Llc	84673617
PAT	Auto Center Of Greer Llc	84684960
PAZ	Trey Crouch's Wheels On Credit Inc	84628579
PCM	The Auto Team Llc	86648190
PCM	The Auto Team Llc	86501044
PCM	The Auto Team Llc	86655433
PCM	The Auto Team Llc	86449960
PCM	The Auto Team Llc	86990596

PCM	The Auto Team Llc	86699279
PCM	The Auto Team Llc	86572899
PCM	The Auto Team Llc	86303094
PCM	The Auto Team Llc	86436608
PCM	The Auto Team Llc	86235492
PCM	The Auto Team Llc	86430668
PCM	The Auto Team Llc	86611801
PCM	The Auto Team Llc	86708986
PDD	Platinum Auto, Llc	83323152
PDD	Platinum Auto, Llc	81168581
PDD	Platinum Auto, Llc	83509130
PDD	Platinum Auto, Llc	83761769
PDD	Platinum Auto, Llc	83710355
PDD	Platinum Auto, Llc	83316264
PDD	Platinum Auto, Llc	83638795
PDD	Platinum Auto, Llc	83335154
PDF	American Eagle Motors Llc	84058495
PDF	American Eagle Motors Llc	84011031
PDF	American Eagle Motors Llc	83657316
PDF	American Eagle Motors Llc	83149785
PDF	American Eagle Motors Llc	83898978
PDF	American Eagle Motors Llc	84146259
PDF	American Eagle Motors Llc	83924552
PDF	American Eagle Motors Llc	84078235
PDF	American Eagle Motors Llc	83788642
PDF	American Eagle Motors Llc	84077090
PDF	American Eagle Motors Llc	84182286
PDS	New Jersey Used Cars Center Inc	83822063
PFS	Performance Motorsports Supercenter Llc	82128195
PFS	Performance Motorsports Supercenter Llc	81755016
PFS	Performance Motorsports Supercenter Llc	81565039
PFS	Performance Motorsports Supercenter Llc	81931530
PFS	Performance Motorsports Supercenter Llc	81854749
PFS	Performance Motorsports Supercenter Llc	81801174
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PFS	Performance Motorsports Supercenter Llc	82191990
PFS	Performance Motorsports Supercenter Llc	82513375
PFS	Performance Motorsports Supercenter Llc	82201508
PFS	Performance Motorsports Supercenter Llc	82603135
PFS	Performance Motorsports Supercenter Llc	82622192
PFS	Performance Motorsports Supercenter Llc	82899803
PFS	Performance Motorsports Supercenter Llc	82818528
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PFS	Performance Motorsports Supercenter Llc	82684855
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PFS	Performance Motorsports Supercenter Llc	82562851
PFS	Performance Motorsports Supercenter Llc	82665865
PFS	Performance Motorsports Supercenter Llc	82493241
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PFS	Performance Motorsports Supercenter Llc	82535747
PFS	Performance Motorsports Supercenter Llc	81992627

PFS	Performance Motorsports Supercenter, Llc	82097762
PFS	Performance Motorsports Supercenter, Llc	82190630
PFS	Performance Motorsports Supercenter, Llc	82043473
PFS	Performance Motorsports Supercenter, Llc	82015812
PFS	Performance Motorsports Supercenter, Llc	82056664
PFS	Performance Motorsports Supercenter, Llc	82019636
PFS	Performance Motorsports Supercenter, Llc	81969764
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PFS	Performance Motorsports Supercenter, Llc	82520530
PFS	Performance Motorsports Supercenter, Llc	82008789
PFS	Performance Motorsports Supercenter, Llc	82976852
PFS	Performance Motorsports Supercenter, Llc	82703901
PFS	Performance Motorsports Supercenter, Llc	82666973
PFS	Performance Motorsports Supercenter, Llc	82495046
PFS	Performance Motorsports Supercenter, Llc	82498682
PFT	North Coast Car Credit Llc	87981867
PFT	North Coast Car Credit Llc	88189128
PFT	North Coast Car Credit Llc	88178749
PFT	North Coast Car Credit Llc	88165905
PFT	North Coast Car Credit Llc	88034713
PFT	North Coast Car Credit Llc	88108735
PFT	North Coast Car Credit Llc	88072445
PFT	North Coast Car Credit Llc	88098803
PFV	Adel Car Company Llc	82031776
PFV	Adel Car Company Llc	83677090
PFV	Adel Car Company Llc	83997769
PFV	Adel Car Company Llc	83681886
PFV	Adel Car Company Llc	84339510
PFV	Adel Car Company Llc	83751104
PFV	Adel Car Company Llc	84276189
PFV	Adel Car Company Llc	83743397
PFV	Adel Car Company Llc	83935456
PFV	Adel Car Company Llc	83580668
PFV	Adel Car Company Llc	84069378
PFV	Adel Car Company Llc	84195447
PFV	Adel Car Company Llc	83881310
PFV	Adel Car Company Llc	84636191
PFV	Adel Car Company Llc	84671647
PFV	Adel Car Company Llc	84306089
PFV	Adel Car Company Llc	83619563
PGG	Qdj Arbitration & Acquisitions Inc	85073630
PGL	Northwest Financial Llc	82546937
PGL	Northwest Financial Llc	82140032
PGL	Northwest Financial Llc	82546937
PGL	Northwest Financial Llc	83456506
PGL	Northwest Financial Llc	83037320
PGL	Northwest Financial Llc	83037320
PGV	Kay Auto Sales, Llc	81257933
PGV	Kay Auto Sales, Llc	83134171
PGZ	Colleen Gray	83432615
PGZ	Colleen Gray	83722407
PGZ	Colleen Gray	83687984
PGZ	Colleen Gray	83739682
PGZ	Colleen Gray	83579957
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PGZ	Colleen Gray	84064329
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PGZ	Colleen Gray	84081342
PGZ	Colleen Gray	84033723
PGZ	Colleen Gray	84032192
PGZ	Colleen Gray	84021521
PGZ	Colleen Gray	83905756
PGZ	Colleen Gray	83726848
PHD	Enterprise Leonard, Inc.	86792538
PHU	Aaron Matthew Ayala Tinoco	81526934
PKH	Dream Cars Unlimited Inc	85135339
PKH	Dream Cars Unlimited Inc	85202514
PKU	Mobile Ez Auto Credit Inc	81668753
PKU	Mobile Ez Auto Credit Inc	82656635
PKU	Mobile Ez Auto Credit Inc	85743507
PKU	Mobile Ez Auto Credit Inc	85594523
PKU	Mobile Ez Auto Credit Inc	85608867
PKU	Mobile Ez Auto Credit Inc	85811011
PKU	Mobile Ez Auto Credit Inc	85561235
PKU	Mobile Ez Auto Credit Inc	86311829
PLB	Onyx Auto Group Llc	82817536
PLB	Onyx Auto Group Llc	83158966
PLB	Onyx Auto Group Llc	83177828
PLB	Onyx Auto Group Llc	83428012
PLB	Onyx Auto Group Llc	83080070
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PLB	Onyx Auto Group Llc	82712788
PLB	Onyx Auto Group Llc	83503179
PLB	Onyx Auto Group Llc	83470329
PLB	Onyx Auto Group Llc	83426326
PLF	American Automotive Llc	85366719
PMJ	Dynamic Auto Group Inc	83113315
PMJ	Dynamic Auto Group Inc	84107642
PMJ	Dynamic Auto Group Inc	83193345
PMJ	Dynamic Auto Group Inc	83480889
PMJ	Dynamic Auto Group Inc	84550452
PMJ	Dynamic Auto Group Inc	84552692

PMJ	Dynamic Auto Group Inc	84578168
PMJ	Dynamic Auto Group Inc	85205012
PMJ	Dynamic Auto Group Inc	85136391
PMJ	Dynamic Auto Group Inc	85159805
PMJ	Dynamic Auto Group Inc	85107682
PMJ	Dynamic Auto Group Inc	85082014
PMJ	Dynamic Auto Group Inc	84630096
PMJ	Dynamic Auto Group Inc	85209613
PMJ	Dynamic Auto Group Inc	84946210
PMJ	Dynamic Auto Group Inc	85070901
PMJ	Dynamic Auto Group Inc	84710083
PMJ	Dynamic Auto Group Inc	84403134
PMJ	Dynamic Auto Group Inc	84857458
PMJ	Dynamic Auto Group Inc	84533264
PMJ	Dynamic Auto Group Inc	85217265
PMJ	Dynamic Auto Group Inc	84789384
PMJ	Dynamic Auto Group Inc	84997285
PMR	Dynasty Motors Llc	81837274
PMR	Dynasty Motors Llc	82017026
PMR	Dynasty Motors Llc	81941020
PMX	Lou Fusz Motor Company	86768123
PND	Best Car4u Llc	86556819
PNQ	Moore For Less Auto Sales Llc	83638112
PNQ	Moore For Less Auto Sales Llc	84099600
PNQ	Moore For Less Auto Sales Llc	83878157
PNQ	Moore For Less Auto Sales Llc	83878290
PNQ	Moore For Less Auto Sales Llc	83466044
PNQ	Moore For Less Auto Sales Llc	84215110
PNQ	Moore For Less Auto Sales Llc	84109867
PNQ	Moore For Less Auto Sales Llc	84150631
PPK	Big City Cars Sales Llc	81430573
PPK	Big City Cars Sales Llc	81537037
PPK	Big City Cars Sales Llc	81526736
PQX	L&d Financial Llc	83232368
PRX	Berkshire Car Company, Inc.	82592488
PRY	Lakeview Motors Llc	82087949
PSB	State Street Auto Sales Inc	81677428
PSB	State Street Auto Sales Inc	83656065
PSG	Jack And Sons Enterprise, Inc	82334886
PSG	Jack And Sons Enterprise, Inc	82818195
PSX	Ryan Walker	81435329
PSX	Ryan Walker	81917224
PSX	Ryan Walker	81851210
PTC	Blue Sky Wholesale Inc	82072387
PTW	Car Club Los Angeles	82046234
PTW	Car Club Los Angeles	81724854
PTW	Car Club Los Angeles	81968157
PTW	Car Club Los Angeles	82191980
PUB	Government Fleet Sales Llc	91620950
PUS	Greenes Auto Sales Llc	82796319
PUT	Autobarn Llc	81655117
PVN	Mph Autobroker Llc	82063250
PXK	L F Donnell Inc	83401911
PXU	World Class Management Inc	84820064
PXU	World Class Management Inc	84663352
PXU	World Class Management Inc	84640521
PXU	World Class Management Inc	84875820
PYB	Mvb Car Inc	81374268
PYC	J-Crews Auto Sales Llc	83733305
PYC	J-Crews Auto Sales Llc	83552940
PYC	J-Crews Auto Sales Llc	82980266
PYG	C & M Investments Of Nc Inc	85683267

PYQ	Genesis Automotive Inc	83578786
PYQ	Genesis Automotive Inc	84505598
PZB	Boyer Venture Group Llc	81906337
PZD	Car Rogues Llc	82032316
Q0A	Metro Auto Sales, Inc.	85360527
Q0Q	Giants Auto Sale Llc	81835937
Q0Q	Giants Auto Sale Llc	87139951
Q0V	Mahmood Husam Mohammad	85238519
Q1K	E-Z Buy Motors, Inc	82072375
Q1L	Autorama Sales Inc	88417622
Q1L	Autorama Sales Inc	88463411
Q2N	Isaac Lang Jr	82453638
Q2Q	Bp Auto Group Llc	83861168
Q2Q	Bp Auto Group Llc	83756155
Q3D	Lynette D Hampton	81899422
Q3Q	Lafia Sotolongo	83782983
Q3Q	Lafia Sotolongo	83213684
Q3Q	Lafia Sotolongo	83754433
Q3Q	Lafia Sotolongo	83907784
Q3Q	Lafia Sotolongo	83964221
Q3Q	Lafia Sotolongo	83928999
Q3Q	Lafia Sotolongo	83813223
Q3Q	Lafia Sotolongo	84086166
Q3Q	Lafia Sotolongo	84125801
Q4K	S & L Automotive Solutions, Inc.	81929654
Q4K	S & L Automotive Solutions, Inc.	84499709
Q4K	S & L Automotive Solutions, Inc.	84334086
Q4K	S & L Automotive Solutions, Inc.	84324207
Q4K	S & L Automotive Solutions, Inc.	84241692
Q4K	S & L Automotive Solutions, Inc.	83985100
Q4K	S & L Automotive Solutions, Inc.	83973614
Q4K	S & L Automotive Solutions, Inc.	83945705
Q4K	S & L Automotive Solutions, Inc.	84597723
Q4K	S & L Automotive Solutions, Inc.	83969036
Q4K	S & L Automotive Solutions, Inc.	83626930
Q4K	S & L Automotive Solutions, Inc.	83619398
Q4K	S & L Automotive Solutions, Inc.	84227516
Q4Q	Sin City Motors Llc	84702562
Q4Q	Sin City Motors Llc	84431131
Q4Q	Sin City Motors Llc	84006876
Q4Q	Sin City Motors Llc	83730756
Q4Q	Sin City Motors Llc	84358445
Q4Q	Sin City Motors Llc	84432650
Q4Q	Sin City Motors Llc	84419473
Q4W	Discount Motor Llc	81589719
Q5C	Oscar J Bakke	85491786
Q5C	Oscar J Bakke	85074007
Q5L	Kiplin Automotive Group Inc	82265879
Q5W	Holdman Management System Incorporated	83447570
Q5W	Holdman Management System Incorporated	83615303
Q5Z	Jacob Green	82018508
Q6H	Georgia Zone Autos Llc	84065293
Q6H	Georgia Zone Autos Llc	84196923
Q6H	Georgia Zone Autos Llc	84241989
Q6H	Georgia Zone Autos Llc	84193881
Q6H	Georgia Zone Autos Llc	84194077

Q6H	Georgia Zone Autos Llc	84023969
Q6H	Georgia Zone Autos Llc	83864678
Q6N	Auto Motive Consortium Llc	82312721
Q6Q	Jorge Espinoza Jr	87582338
Q6Q	Jorge Espinoza Jr	87702584
Q6Q	Jorge Espinoza Jr	88241610
Q6R	Trinity Automotive Inc.	81949830
Q7X	Central Mn Motors Llc	83136846
Q7X	Central Mn Motors Llc	82911942
Q7X	Central Mn Motors Llc	82884583
Q7X	Central Mn Motors Llc	83204616
Q7X	Central Mn Motors Llc	83012537
Q7X	Central Mn Motors Llc	83004841
Q7X	Central Mn Motors Llc	83031973
Q7X	Central Mn Motors Llc	82916617
Q7X	Central Mn Motors Llc	83795055
Q7X	Central Mn Motors Llc	84001742
Q7X	Central Mn Motors Llc	82681915
Q7X	Central Mn Motors Llc	83832707
Q7X	Central Mn Motors Llc	83146050
Q7X	Central Mn Motors Llc	83850350
Q7X	Central Mn Motors Llc	83845915
Q7X	Central Mn Motors Llc	83783747
Q7X	Central Mn Motors Llc	83755159
Q7X	Central Mn Motors Llc	83917863
Q7X	Central Mn Motors Llc	83815140
Q7X	Central Mn Motors Llc	83149940
Q7X	Central Mn Motors Llc	83789573
Q7X	Central Mn Motors Llc	83827933
Q7X	Central Mn Motors Llc	83935246
Q7X	Central Mn Motors Llc	83864316
Q8A	Future Auto Imports Inc	84433417
Q8M	Lewis Auto & Detail Llc	83191755
Q8M	Lewis Auto & Detail Llc	82439302
Q8M	Lewis Auto & Detail Llc	83208088
Q8M	Lewis Auto & Detail Llc	83192561
Q8M	Lewis Auto & Detail Llc	82447707
Q8M	Lewis Auto & Detail Llc	83133732
Q8M	Lewis Auto & Detail Llc	82609722
Q8M	Lewis Auto & Detail Llc	81846257
Q8M	Lewis Auto & Detail Llc	82519727
Q8P	Finsanto Llc	84167365
Q9F	Sy Fy Auto Llc	85668211
Q9Q	Smith & Moyer Llc	81895678
Q9Q	Smith & Moyer Llc	82463717
Q9Y	Cars R Us Preowned Llc	85439753
Q9Y	Cars R Us Preowned Llc	84853463
Q9Y	Cars R Us Preowned Llc	85539593
Q9Y	Cars R Us Preowned Llc	85287400
Q9Y	Cars R Us Preowned Llc	85287333
Q9Y	Cars R Us Preowned Llc	85040050
Q9Y	Cars R Us Preowned Llc	85609126
Q9Y	Cars R Us Preowned Llc	85863379
Q9Y	Cars R Us Preowned Llc	85423197
Q9Y	Cars R Us Preowned Llc	85631760
Q9Y	Cars R Us Preowned Llc	85794133
Q9Y	Cars R Us Preowned Llc	85930879
Q9Y	Cars R Us Preowned Llc	86061136
Q9Y	Cars R Us Preowned Llc	85949268
Q9Y	Cars R Us Preowned Llc	85703743
Q9Y	Cars R Us Preowned Llc	85659996
Q9Y	Cars R Us Preowned Llc	85862086

Q9Y	Cars R Us Preowned Llc	86028964
Q9Y	Cars R Us Preowned Llc	85971419
Q9Y	Cars R Us Preowned Llc	85595303
Q9Y	Cars R Us Preowned Llc	85820396
Q9Y	Cars R Us Preowned Llc	85600288
Q9Y	Cars R Us Preowned Llc	85396113
Q9Y	Cars R Us Preowned Llc	85673764
Q9Z	Mountain West Motor Company	82968541
Q9Z	Mountain West Motor Company	82812427
QAJ	Mclarty Cmfo Llc	82376216
QAJ	Mclarty Cmfo Llc	82475457
QAK	Testarossa Motors Inc	85977943
QAK	Testarossa Motors Inc	85785534
QAK	Testarossa Motors Inc	85976692
QAK	Testarossa Motors Inc	86107126
QAM	Quality Auto Llc	84530260
QAM	Quality Auto Llc	84230710
QAM	Quality Auto Llc	84669663
QBF	Blue Light Auto Sales, Llc	84426563
QBJ	Fast Approval Auto Sales, Llc	81867326
QBJ	Fast Approval Auto Sales, Llc	81970474
QBJ	Fast Approval Auto Sales, Llc	81719861
QBJ	Fast Approval Auto Sales, Llc	81861310
QBJ	Fast Approval Auto Sales, Llc	81585899
QBJ	Fast Approval Auto Sales, Llc	81860100
QBJ	Fast Approval Auto Sales, Llc	81943531
QBJ	Fast Approval Auto Sales, Llc	81697317
QBJ	Fast Approval Auto Sales, Llc	81824612
QBJ	Fast Approval Auto Sales, Llc	81768082
QBJ	Fast Approval Auto Sales, Llc	81729387
QBJ	Fast Approval Auto Sales, Llc	81733287
QBJ	Fast Approval Auto Sales, Llc	81801267
QBJ	Fast Approval Auto Sales, Llc	81758111
QBJ	Fast Approval Auto Sales, Llc	81805244
QBJ	Fast Approval Auto Sales, Llc	81793266
QBJ	Fast Approval Auto Sales, Llc	81749892
QBJ	Fast Approval Auto Sales, Llc	81670805
QBJ	Fast Approval Auto Sales, Llc	81673232
QBJ	Fast Approval Auto Sales, Llc	82023371
QBJ	Fast Approval Auto Sales, Llc	81948406
QBJ	Fast Approval Auto Sales, Llc	81669989
QBJ	Fast Approval Auto Sales, Llc	81979618
QBJ	Fast Approval Auto Sales, Llc	81665957
QCU	Deals For Wheels Auto Sales Llc	82629425
QCU	Deals For Wheels Auto Sales Llc	82709871
QCU	Deals For Wheels Auto Sales Llc	82665488
QCU	Deals For Wheels Auto Sales Llc	81926304
QCU	Deals For Wheels Auto Sales Llc	82987441
QCU	Deals For Wheels Auto Sales Llc	82731916
QCU	Deals For Wheels Auto Sales Llc	82291621
QDD	Rods Cars Inc	81706670
QDF	Mclarty Cmdcj Llc	82624016
QDG	Mclarty Cmn, Llc	82989431
QDG	Mclarty Cmn, Llc	84109847
QDH	Mclarty Cmvw Llc	83847257
QDL	Mclarty Cmhy Llc	82893628
QDN	Beltline Re Marketing Llc	84903966
QDX	Yes Motors Llc	81944619

QFC	Blue Collar Auto Sales & Detailing Llc	85782112
QFF	W Hare And Son Incorporated	85540980
QFH	Christina Romero Luna	81891326
QGC	Heights Auto Sales Llc	82945663
QGF	U & H Wh Llc	88071983
QGT	Charles L. Wade Jr.	84508812
QGT	Charles L. Wade Jr.	85397529
QGT	Charles L. Wade Jr.	84908958
QGT	Charles L. Wade Jr.	85603037
QGT	Charles L. Wade Jr.	85084451
QHC	Stephen D Rennells	83155138
QHC	Stephen D Rennells	82804174
QHC	Stephen D Rennells	83113541
QHC	Stephen D Rennells	83593379
QHC	Stephen D Rennells	83553108
QHC	Stephen D Rennells	82804174
QHM	All Seasons Auto Sales Inc.	82192517
QHQ	Pioneer Motor Group, Llc	85134363
QJB	Willis Auto Group Inc	81770662
QJB	Willis Auto Group Inc	82968269
QJB	Willis Auto Group Inc	82928957
QJB	Willis Auto Group Inc	82791032
QJB	Willis Auto Group Inc	83143226
QJB	Willis Auto Group Inc	82897443
QJB	Willis Auto Group Inc	82709796
QJB	Willis Auto Group Inc	82666901
QJB	Willis Auto Group Inc	82662641
QJB	Willis Auto Group Inc	82530215
QJB	Willis Auto Group Inc	82591988
QJB	Willis Auto Group Inc	82261804
QJB	Willis Auto Group Inc	82873810
QJB	Willis Auto Group Inc	82995315
QJB	Willis Auto Group Inc	82795537
QJB	Willis Auto Group Inc	82787062
QJB	Willis Auto Group Inc	82764174
QJB	Willis Auto Group Inc	82768977
QJB	Willis Auto Group Inc	82532907
QJB	Willis Auto Group Inc	82695124
QJB	Willis Auto Group Inc	82636357
QJJ	Northeast Auto Land Inc	83178500
QJJ	Northeast Auto Land Inc	83401040
QJJ	Northeast Auto Land Inc	83295039
QJJ	Northeast Auto Land Inc	83679538
QJJ	Northeast Auto Land Inc	84063690
QJP	Tnt Cars Llc	82395288
QKJ	Wny Auto Warehouse Inc	82375242
QKW	L G M 1 Llc	83130662
QKW	L G M 1 Llc	84046895
QL3	Delta Auto Trading Inc	81702029
QL3	Delta Auto Trading Inc	85701802
QL3	Delta Auto Trading Inc	86070866
QL3	Delta Auto Trading Inc	86220046
QL9	Benjamin Beeler	82771838
QL9	Benjamin Beeler	82784451
QL9	Benjamin Beeler	82801683
QL9	Benjamin Beeler	83167672
QL9	Benjamin Beeler	82772433
QL9	Benjamin Beeler	82990452
QL9	Benjamin Beeler	83082862
QL9	Benjamin Beeler	82930018
QL9	Benjamin Beeler	82670043
QL9	Benjamin Beeler	82429036

QL9	Benjamin Beeler	82785032
QL9	Benjamin Beeler	82943111
QL9	Benjamin Beeler	82678207
QL9	Benjamin Beeler	82913084
QL9	Benjamin Beeler	82694656
QLA	T&sma Llc	83000040
QLR	Truth Automotive Llc	83053110
QLR	Truth Automotive Llc	84713185
QLR	Truth Automotive Llc	83676018
QLR	Truth Automotive Llc	85135325
QLR	Truth Automotive Llc	85308589
QLR	Truth Automotive Llc	85611439
QLR	Truth Automotive Llc	85786623
QLR	Truth Automotive Llc	85592333
QLX	Jcn Inc	89859996
QM2	Pwk Inc	82312330
QM2	Pwk Inc	83298975
QM2	Pwk Inc	82937809
QM2	Pwk Inc	83753413
QM2	Pwk Inc	83645615
QM2	Pwk Inc	83502943
QM2	Pwk Inc	83298172
QM2	Pwk Inc	83290123
QM2	Pwk Inc	82938737
QM2	Pwk Inc	83374355
QM2	Pwk Inc	83344023
QM2	Pwk Inc	82833144
QM2	Pwk Inc	83293068
QM2	Pwk Inc	83508495
QM2	Pwk Inc	83560956
QM2	Pwk Inc	83562558
QM2	Pwk Inc	83120093
QM2	Pwk Inc	83100300
QM2	Pwk Inc	83501828
QM2	Pwk Inc	82984535
QM2	Pwk Inc	82955733
QM2	Pwk Inc	83588144
QM2	Pwk Inc	83611015
QM2	Pwk Inc	83667167
QM3	Sky Auto Group 1 Inc.	85344976
QMB	A-1 Auto Plex Llc	82611308
QMB	A-1 Auto Plex Llc	82565518
QMG	Troy York	84623656
QMG	Troy York	84516164
QMG	Troy York	84191611
QMG	Troy York	84094572
QMG	Troy York	83984015
QMG	Troy York	84484279
QNC	D A.D Automotive Llc	83775820
QND	Kamaljeet Kaur Bhamra	82970212
QND	Kamaljeet Kaur Bhamra	83228657
QND	Kamaljeet Kaur Bhamra	82961339
QND	Kamaljeet Kaur Bhamra	82475566
QND	Kamaljeet Kaur Bhamra	83025000
QND	Kamaljeet Kaur Bhamra	83637813
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QND	Kamaljeet Kaur Bhamra	83292617
QND	Kamaljeet Kaur Bhamra	83152120
QND	Kamaljeet Kaur Bhamra	83396567
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QND	Kamaljeet Kaur Bhamra	83283642
QND	Kamaljeet Kaur Bhamra	83274207
QND	Kamaljeet Kaur Bhamra	82930175
QND	Kamaljeet Kaur Bhamra	82736670
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QND	Kamaljeet Kaur Bhamra	83646648
QND	Kamaljeet Kaur Bhamra	83648322
QND	Kamaljeet Kaur Bhamra	83632652
QND	Kamaljeet Kaur Bhamra	83556724
QND	Kamaljeet Kaur Bhamra	83521064
QND	Kamaljeet Kaur Bhamra	83462339
QND	Kamaljeet Kaur Bhamra	83598778
QND	Kamaljeet Kaur Bhamra	83365849
QND	Kamaljeet Kaur Bhamra	83366876
QND	Kamaljeet Kaur Bhamra	83510118
QND	Kamaljeet Kaur Bhamra	83505386
QNG	I Video Systems, Inc.	83010565
QNG	I Video Systems, Inc.	82723339
QNG	I Video Systems, Inc.	82732909
QNX	Ram Motors Llc	85815140
QPA	Stanford-Pullens Used Cars Llc	82238415
QPY	Startronics Auto Llc	83308592
QPY	Startronics Auto Llc	83592009
QRH	Otoniel Escobar Barrios	81848928
QRH	Otoniel Escobar Barrios	82064933
QRS	Mcnatt Motors Llc	82544313
QRW	Anthony O. Ferry	84000159
QTC	A Better Car Dealership Llc	86817033
QTN	Zahir & Sons Corporation Llc	83797894
QTT	Jesus Aceves	87556334
QUG	Drive t Home Auto, Llc	83830544
QUG	Drive t Home Auto, Llc	83870695
QUG	Drive t Home Auto, Llc	83897574
QUG	Drive t Home Auto, Llc	83903397
QUG	Drive t Home Auto, Llc	83836803
QUG	Drive t Home Auto, Llc	83851870
QUG	Drive t Home Auto, Llc	83993243
QUG	Drive t Home Auto, Llc	83972164
QUG	Drive t Home Auto, Llc	83872517
QUG	Drive t Home Auto, Llc	83831515
QUG	Drive t Home Auto, Llc	83830853
QUG	Drive t Home Auto, Llc	83813897
QUG	Drive t Home Auto, Llc	83782449
QUG	Drive t Home Auto, Llc	83407111
QUG	Drive t Home Auto, Llc	83733213
QUJ	Champs Auto Sales Llc	83137573
QUJ	Champs Auto Sales Llc	83741071
QUJ	Champs Auto Sales Llc	81972068
QUR	L V Auto Group Llc	83039933
QVU	Smile Auto Dealer Llc	82365987
QVX	Paid Auto Llc	82784315
QVY	Auto Spa Automotive Sales Inc	84503202
QVY	Auto Spa Automotive Sales Inc	84166483
QVY	Auto Spa Automotive Sales Inc	84290057
QWL	Daves Auto Repair & Sales, Llc	83870908
QWL	Daves Auto Repair & Sales, Llc	83947913
QWL	Daves Auto Repair & Sales, Llc	83791836
QWL	Daves Auto Repair & Sales, Llc	84061674

QWL	Daves Auto Repair & Sales, Llc	83860716
QWL	Daves Auto Repair & Sales, Llc	84314279
QWL	Daves Auto Repair & Sales, Llc	83750942
QXA	Sergei M. Sears	82271654
QXY	Driven Automotive Group Inc	82554106
QY0	Joseph Chevrolet Co	79677562
QYH	Orp Holdings Llc	82466460
QYH	Orp Holdings Llc	82800552
QYH	Orp Holdings Llc	82631925
QYH	Orp Holdings Llc	82493286
QYH	Orp Holdings Llc	82350407
QYH	Orp Holdings Llc	82044795
QYH	Orp Holdings Llc	81970672
QYH	Orp Holdings Llc	82377486
QYH	Orp Holdings Llc	82916429
QYH	Orp Holdings Llc	82944918
QYM	Trac Auto Sales Llc	86882991
QYQ	William Burl Woolard	85984410
QZB	One Stop Auto Sales Llc	82172780
QZB	One Stop Auto Sales Llc	82898848
QZQ	Jackson Mac Haik Cdjrltd	83557515
R0L	Kca Auto Enterprise	82781232
R0L	Kca Auto Enterprise	83787548
R0L	Kca Auto Enterprise	83662703
R0L	Kca Auto Enterprise	83663019
R0L	Kca Auto Enterprise	83702519
R0L	Kca Auto Enterprise	83786633
R0L	Kca Auto Enterprise	83309439
R0L	Kca Auto Enterprise	83746865
R0L	Kca Auto Enterprise	83639488
R0P	Dwight Helmick	83141970
R0P	Dwight Helmick	83105737
R0P	Dwight Helmick	83246480
R0P	Dwight Helmick	83254901
R0Y	U S Automart Atlanta Inc	82083771
R1G	Pre-Approved Auto Inc	82643215
R1V	Cents Llc	82403549
R1V	Cents Llc	83347160
R1V	Cents Llc	83561697
R1V	Cents Llc	83742799
R1V	Cents Llc	83755922
R1V	Cents Llc	83938967
R1X	Harrison Family Motors Inc	82068238
R2D	Ironhorse Auto Inc	82451280
R2J	David Palafox	83100845
R3W	Universal Auto Plaza Inc	83503605
R4B	Starstruck Auto Sales Llc	84513776
R4B	Starstruck Auto Sales Llc	84803930
R4B	Starstruck Auto Sales Llc	85102113
R4B	Starstruck Auto Sales Llc	84618014
R4B	Starstruck Auto Sales Llc	84638902
R4B	Starstruck Auto Sales Llc	85046817
R4P	James Lucke	82395720
R4P	James Lucke	82586785
R4P	James Lucke	82333585
R5C	Sonny Cannon Auto Plaza, Inc	82669091
R5L	Luther E Smith Jr	86547171
R6D	Apple Automotive Llc	83775705
R6D	Apple Automotive Llc	84317839
R6T	Layden Garrett Walker	85254687
R6T	Layden Garrett Walker	85496274

R6T	Layden Garrett Walker	85470922
R6T	Layden Garrett Walker	85546717
R6T	Layden Garrett Walker	85775624
R6T	Layden Garrett Walker	85442460
R6T	Layden Garrett Walker	85634617
R6T	Layden Garrett Walker	85693627
R6T	Layden Garrett Walker	86238320
R6T	Layden Garrett Walker	85510488
R6T	Layden Garrett Walker	85124483
R6T	Layden Garrett Walker	85446066
R6T	Layden Garrett Walker	85541890
R6T	Layden Garrett Walker	86276457
R6T	Layden Garrett Walker	86068973
R6T	Layden Garrett Walker	86048973
R6T	Layden Garrett Walker	85931306
R6T	Layden Garrett Walker	86094211
R7H	Third Generation Automotive Llc	84724210
R7H	Third Generation Automotive Llc	84763924
R7L	Junco Auto Sales Inc	83667045
R7L	Junco Auto Sales Inc	83649701
R7R	Hayden Mcqueen	83687158
R8J	5 Star Motors Llc	88860616
R8J	5 Star Motors Llc	89048814
R8J	5 Star Motors Llc	89310095
R8J	5 Star Motors Llc	88837134
R8J	5 Star Motors Llc	87305198
R8J	5 Star Motors Llc	88825292
R8J	5 Star Motors Llc	88969562
R8J	5 Star Motors Llc	89380395
R8J	5 Star Motors Llc	89350831
R8J	5 Star Motors Llc	89482201
R8J	5 Star Motors Llc	89238609
R8J	5 Star Motors Llc	89311548
R8J	5 Star Motors Llc	88768309
RBK	Renton K Inc	87140078
RBP	James Greene	82569651
RBQ	Q Motorcars Inc	82907204
RBQ	Q Motorcars Inc	82935069
RBR	Nicholas Homrock	82994113
RDB	Barksdale Motor Sport Llc	84033721
RFP	Top 2 Bottom Motors, Llc	88387446
RFV	Dealer Consulting Services Inc	82736812
RFV	Dealer Consulting Services Inc	82776215
RGQ	Ruby Thomas	83190955
RGQ	Ruby Thomas	83307984
RGQ	Ruby Thomas	83199406
RGQ	Ruby Thomas	83207620
RGQ	Ruby Thomas	83175219
RGZ	Fleet Sales & Services Llc	84045882
RHC	Amber Jennings	83571723
RJK	Fast Lane Llc	82622386
RKX	Black Tie Inc	85574441
RKZ	Kassem Export Corporation	84141010
RKZ	Kassem Export Corporation	84161247
RKZ	Kassem Export Corporation	84632466
RLB	Auto Show Enterprises Llc	84447024
RLB	Auto Show Enterprises Llc	84683482
RLB	Auto Show Enterprises Llc	84954206
RLB	Auto Show Enterprises Llc	85360621
RLD	Ross Hamilton	84606001
RLD	Ross Hamilton	84656493

RLD	Ross Hamilton	84564759
RLD	Ross Hamilton	84557695
RLD	Ross Hamilton	84731282
RLD	Ross Hamilton	84628253
RLD	Ross Hamilton	84563974
RMB	Jason G Mcewen	82164252
RMB	Jason G Mcewen	82448064
RMB	Jason G Mcewen	82771712
RMB	Jason G Mcewen	83187953
RMB	Jason G Mcewen	83159873
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RMB	Jason G Mcewen	82661002
RMB	Jason G Mcewen	82912858
RMB	Jason G Mcewen	82941877
RMQ	1821 East New York Avenue Inc	84111834
RMQ	1821 East New York Avenue Inc	83904234
RMQ	1821 East New York Avenue Inc	83836345
RMQ	1821 East New York Avenue Inc	84295073
RMQ	1821 East New York Avenue Inc	84056839
RNB	Lone Star Finance Llc	85738320
RNJ	New Vision Automotive Llc	85167965
RPK	Zachary Nicholas Villejo	84144304
RPK	Zachary Nicholas Villejo	85937120
RQC	The Bhkh Firm , Llc	87943496
RQF	Mclarty Lrn, Llc	82300361
RQG	Louisburg Motors Llc	83697127
RQG	Louisburg Motors Llc	83586137
RQG	Louisburg Motors Llc	84063612
RQG	Louisburg Motors Llc	83750406
RQG	Louisburg Motors Llc	83770868
RQH	Dons Auto Sales Llc	85512201
RQH	Dons Auto Sales Llc	85640824
RQH	Dons Auto Sales Llc	85640706
RQH	Dons Auto Sales Llc	85586058
RQH	Dons Auto Sales Llc	85615463
RQH	Dons Auto Sales Llc	85439214
RQH	Dons Auto Sales Llc	85569308
RQH	Dons Auto Sales Llc	85643548
RQH	Dons Auto Sales Llc	85550000
RQH	Dons Auto Sales Llc	85547152
RQH	Dons Auto Sales Llc	85524707
RQH	Dons Auto Sales Llc	85509426
RQH	Dons Auto Sales Llc	85509285
RQH	Dons Auto Sales Llc	85507105
RQH	Dons Auto Sales Llc	85405649
RQH	Dons Auto Sales Llc	85374932
RQH	Dons Auto Sales Llc	85373753
RQH	Dons Auto Sales Llc	85296463
RQH	Dons Auto Sales Llc	85300476
RQH	Dons Auto Sales Llc	84610898
RQH	Dons Auto Sales Llc	85026945
RQH	Dons Auto Sales Llc	85068841
RQH	Dons Auto Sales Llc	85012759
RQH	Dons Auto Sales Llc	85643783

RQH	Dons Auto Sales Llc	85942013
RQH	Dons Auto Sales Llc	85816771
RQH	Dons Auto Sales Llc	85753042
RQH	Dons Auto Sales Llc	85792835
RQH	Dons Auto Sales Llc	85761133
RQH	Dons Auto Sales Llc	85774915
RQH	Dons Auto Sales Llc	85736804
RQH	Dons Auto Sales Llc	85692801
RQH	Dons Auto Sales Llc	85677047
RQH	Dons Auto Sales Llc	85672650
RQH	Dons Auto Sales Llc	85908461
RRJ	Sanford Auto Center Llc	82394651
RRS	Ramon Santana	82711706
RSV	Sibi Joseph	82999549
RSV	Sibi Joseph	82973047
RSV	Sibi Joseph	82936867
RSV	Sibi Joseph	82936788
RSV	Sibi Joseph	82923677
RSV	Sibi Joseph	82893949
RSV	Sibi Joseph	82896665
RSV	Sibi Joseph	82836261
RSV	Sibi Joseph	82768609
RSV	Sibi Joseph	82754177
RSV	Sibi Joseph	82738905
RSV	Sibi Joseph	82743968
RSV	Sibi Joseph	82734206
RSV	Sibi Joseph	82718337
RSV	Sibi Joseph	82692974
RSV	Sibi Joseph	82634615
RSV	Sibi Joseph	82688969
RSV	Sibi Joseph	82672510
RSV	Sibi Joseph	82884767
RSV	Sibi Joseph	82929158
RSV	Sibi Joseph	82829165
RSV	Sibi Joseph	82901227
RSV	Sibi Joseph	82685493
RSY	Charlotte's House Of Cars Inc	82566920
RTF	2-4-6-K Cars Llc	82831515
RUY	Alne Trade Motors Imp Exp Llc	83982130
RUY	Alne Trade Motors Imp Exp Llc	83739662
RUY	Alne Trade Motors Imp Exp Llc	83959020
RUY	Alne Trade Motors Imp Exp Llc	84242555
RUY	Alne Trade Motors Imp Exp Llc	84107323
RUY	Alne Trade Motors Imp Exp Llc	84045284
RUY	Alne Trade Motors Imp Exp Llc	84359004
RUY	Alne Trade Motors Imp Exp Llc	84374095
RVJ	Brian Tucker	82258508
RVJ	Brian Tucker	83505121
RVJ	Brian Tucker	82297328
RW0	J Eickel Motors Inc	84333108
RWS	Acorn Motor Group Llc	82810507
RWS	Acorn Motor Group Llc	82939508
RWS	Acorn Motor Group Llc	82812504
RWS	Acorn Motor Group Llc	82715310
RWS	Acorn Motor Group Llc	82866127
RWS	Acorn Motor Group Llc	82720569
RWS	Acorn Motor Group Llc	82630652
RWW	Green Bay Auto, Llc	88705025
RWW	Green Bay Auto, Llc	88664008
RXG	Goodman Auto Center Inc	92131149
RXS	Emma Auto Sales Llc	86810147
RXU	Jlw Automotive Inc	82927931

RXU	Jlw Automotive Inc	82935002
RXU	Jlw Automotive Inc	82805498
RXU	Jlw Automotive Inc	82818486
RXU	Jlw Automotive Inc	83168650
RXU	Jlw Automotive Inc	82993802
RXU	Jlw Automotive Inc	82715663
RXU	Jlw Automotive Inc	82938366
RXU	Jlw Automotive Inc	82907868
RXU	Jlw Automotive Inc	82872655
RXU	Jlw Automotive Inc	82682018
RXU	Jlw Automotive Inc	82807748
RXU	Jlw Automotive Inc	82722493
RXU	Jlw Automotive Inc	82701225
RXU	Jlw Automotive Inc	82721628
RXU	Jlw Automotive Inc	82823350
RXU	Jlw Automotive Inc	82342163
RXU	Jlw Automotive Inc	82664938
RXU	Jlw Automotive Inc	82784655
RXU	Jlw Automotive Inc	82658663
RXU	Jlw Automotive Inc	82950526
RXU	Jlw Automotive Inc	82880742
RXU	Jlw Automotive Inc	82974748
RXU	Jlw Automotive Inc	83204901
RXU	Jlw Automotive Inc	83231966
RXU	Jlw Automotive Inc	82722493
RXU	Jlw Automotive Inc	82905078
RXU	Jlw Automotive Inc	82724492
RXU	Jlw Automotive Inc	83099082
RXU	Jlw Automotive Inc	83231825
RXU	Jlw Automotive Inc	83248117
RXU	Jlw Automotive Inc	83228241
RXU	Jlw Automotive Inc	83172654
RXU	Jlw Automotive Inc	83105139
RXU	Jlw Automotive Inc	83155755
RXU	Jlw Automotive Inc	82728743
RXU	Jlw Automotive Inc	82552460
RXU	Jlw Automotive Inc	82809751
RXU	Jlw Automotive Inc	82635313
RXU	Jlw Automotive Inc	82911528
RXU	Jlw Automotive Inc	82793347
RXU	Jlw Automotive Inc	82862954
RXU	Jlw Automotive Inc	82853896
RXU	Jlw Automotive Inc	82775723
RXU	Jlw Automotive Inc	82742388
RXU	Jlw Automotive Inc	82736693
RXU	Jlw Automotive Inc	82737037
RXU	Jlw Automotive Inc	82653306
RXU	Jlw Automotive Inc	82373990
RXU	Jlw Automotive Inc	83094507
RXU	Jlw Automotive Inc	83040434
RXU	Jlw Automotive Inc	83078138
RXU	Jlw Automotive Inc	82988875
RXU	Jlw Automotive Inc	83089242
RXU	Jlw Automotive Inc	83085229
RXU	Jlw Automotive Inc	82967933
RXU	Jlw Automotive Inc	83111029
RXU	Jlw Automotive Inc	83175567
RXU	Jlw Automotive Inc	83227843
RXU	Jlw Automotive Inc	83195080
RXU	Jlw Automotive Inc	83315207
RXU	Jlw Automotive Inc	83292952
RXU	Jlw Automotive Inc	83181886

RXU	Jlw Automotive Inc	83156830
RXU	Jlw Automotive Inc	82976584
RXU	Jlw Automotive Inc	83220908
RXU	Jlw Automotive Inc	83325094
RXU	Jlw Automotive Inc	83049540
RXU	Jlw Automotive Inc	83384422
RXU	Jlw Automotive Inc	82830450
RXU	Jlw Automotive Inc	82873364
RZX	Scott Fyan	88452646
RZX	Scott Fyan	88596837
S0V	Premier Autoworks Sales & Rental Center Llc	84023487
S0V	Premier Autoworks Sales & Rental Center Llc	83894484
S0Y	Roman Motors Llc	83897447
S0Y	Roman Motors Llc	84176080
S0Y	Roman Motors Llc	84761516
S0Y	Roman Motors Llc	84388280
S0Y	Roman Motors Llc	84758382
S0Y	Roman Motors Llc	84248705
S0Y	Roman Motors Llc	83909217
S0Y	Roman Motors Llc	83858814
S0Y	Roman Motors Llc	83857230
S0Y	Roman Motors Llc	84976705
S0Y	Roman Motors Llc	83983976
S0Y	Roman Motors Llc	84081978
S0Y	Roman Motors Llc	83977834
S0Y	Roman Motors Llc	84625431
S0Y	Roman Motors Llc	84188665
S1H	A J Auto Sales, Llc	83414375
S1S	Miriam A. Kocela	83649277
S1S	Miriam A. Kocela	84999991
S2B	Cpl, Inc	84531128
S2B	Cpl, Inc	84484110
S2B	Cpl, Inc	84450097
S2F	Christian Brothers Auto Sales, Llc.	83124050
S2J	Auto Sales And Financial Solutions Llc	82662151
S3Z	Kc Autohaus, Inc.	83974056
S3Z	Kc Autohaus, Inc.	84056209
S3Z	Kc Autohaus, Inc.	83805012
S4A	Millenial Auto Group Llc	83773886
S4A	Millenial Auto Group Llc	83777795
S4A	Millenial Auto Group Llc	83704069
S4A	Millenial Auto Group Llc	83707060
S4A	Millenial Auto Group Llc	83978374
S4A	Millenial Auto Group Llc	83863943
S4A	Millenial Auto Group Llc	83562351
S4T	Crain Hyundai Of Fort Smith Llc	83361705
S5V	Ixl Auto Group Inc	82505875
S5V	Ixl Auto Group Inc	82572501
S5X	Kevin Glenn Shields	83834673
S5X	Kevin Glenn Shields	84759559
S6A	Quality Automotives Inc	84913754
S6A	Quality Automotives Inc	84473311
S6A	Quality Automotives Inc	84680641
S6A	Quality Automotives Inc	84419734
S6A	Quality Automotives Inc	84838738
S6C	The Other Guys Automotive Llc	84398241
S6K	Sam Motor Sports Inc	83550867
S6K	Sam Motor Sports Inc	83233614
S6K	Sam Motor Sports Inc	83165371
S6K	Sam Motor Sports Inc	83511272

S6K	Sam Motor Sports Inc	83524411
S6K	Sam Motor Sports Inc	83479756
S6K	Sam Motor Sports Inc	83220050
S6K	Sam Motor Sports Inc	83196166
S6K	Sam Motor Sports Inc	83529232
S7B	Vagho Auto Inc	85225712
S7B	Vagho Auto Inc	85119453
S7B	Vagho Auto Inc	85120229
S7B	Vagho Auto Inc	85118837
S7B	Vagho Auto Inc	85297790
S7B	Vagho Auto Inc	85225186
S7B	Vagho Auto Inc	85120144
S7W	Car Nation Automotive, Llc	85439621
S7X	Griffs Auto Sales, Inc.	83831970
S7X	Griffs Auto Sales, Inc.	83994457
S7X	Griffs Auto Sales, Inc.	84177919
S7X	Griffs Auto Sales, Inc.	84164404
S7X	Griffs Auto Sales, Inc.	84291380
S7X	Griffs Auto Sales, Inc.	84099584
S7X	Griffs Auto Sales, Inc.	84087576
S7X	Griffs Auto Sales, Inc.	84089377
S7X	Griffs Auto Sales, Inc.	84011985
S7X	Griffs Auto Sales, Inc.	84052878
S7X	Griffs Auto Sales, Inc.	83960255
S7X	Griffs Auto Sales, Inc.	83965787
S7X	Griffs Auto Sales, Inc.	84132425
S7X	Griffs Auto Sales, Inc.	84315694
S7X	Griffs Auto Sales, Inc.	84206876
S7X	Griffs Auto Sales, Inc.	84225846
S7X	Griffs Auto Sales, Inc.	84135760
S7X	Griffs Auto Sales, Inc.	84256843
S7X	Griffs Auto Sales, Inc.	84059747
S7X	Griffs Auto Sales, Inc.	83962688
S7X	Griffs Auto Sales, Inc.	84096768
S7X	Griffs Auto Sales, Inc.	83976098
S7X	Griffs Auto Sales, Inc.	84265015
S9B	James Griffin	82891636
S9U	Kash Automotive Group Llc	84060258
S9U	Kash Automotive Group Llc	84414942
S9U	Kash Automotive Group Llc	84897637
S9U	Kash Automotive Group Llc	84915186
S9U	Kash Automotive Group Llc	84767343
S9U	Kash Automotive Group Llc	84769120
S9U	Kash Automotive Group Llc	84775513
S9U	Kash Automotive Group Llc	84764296
S9U	Kash Automotive Group Llc	84717367
S9U	Kash Automotive Group Llc	84746469
S9U	Kash Automotive Group Llc	84717631
S9U	Kash Automotive Group Llc	84685641
S9U	Kash Automotive Group Llc	84632931
S9U	Kash Automotive Group Llc	84828033
S9U	Kash Automotive Group Llc	84816094
S9U	Kash Automotive Group Llc	84312853
S9U	Kash Automotive Group Llc	84409712
S9U	Kash Automotive Group Llc	84481664
S9U	Kash Automotive Group Llc	84425880
S9U	Kash Automotive Group Llc	84188990
S9U	Kash Automotive Group Llc	84201369
S9U	Kash Automotive Group Llc	84080168
S9U	Kash Automotive Group Llc	84214082
SAB	Finance One Auto Group, Llc	83887920
SAB	Finance One Auto Group, Llc	83710876

SAB	Finance One Auto Group, Llc	83678243
SAB	Finance One Auto Group, Llc	83378056
SAB	Finance One Auto Group, Llc	83847531
SAB	Finance One Auto Group, Llc	84178104
SAB	Finance One Auto Group, Llc	84127862
SAB	Finance One Auto Group, Llc	83987644
SAB	Finance One Auto Group, Llc	84045197
SAB	Finance One Auto Group, Llc	83877855
SAB	Finance One Auto Group, Llc	84121520
SAV	Generation Next Auto Sales Llc	83855576
SAV	Generation Next Auto Sales Llc	84089969
SAV	Generation Next Auto Sales Llc	84205003
SBF	Erica J Gomez	82718252
SCB	People's Choice Auto Mall Llc	84854073
SCB	People's Choice Auto Mall Llc	84868393
SCF	Next Circle, Inc	84531407
SCF	Next Circle, Inc	84166758
SCY	First Auto Credit Llc	83504111
SCY	First Auto Credit Llc	83823820
SCY	First Auto Credit Llc	83344409
SDB	Auto Today Llc	83595539
SDC	Nextgear Automotive Llc	84515022
SG2	Tiger Auto Sales & Finance Llc	83124492
SG2	Tiger Auto Sales & Finance Llc	83663940
SG2	Tiger Auto Sales & Finance Llc	83569599
SG2	Tiger Auto Sales & Finance Llc	83729845
SGA	Imran Imports Llc	84467652
SGJ	Dannys Auto Sales Llc	85016930
SGJ	Dannys Auto Sales Llc	84924606
SGJ	Dannys Auto Sales Llc	85127361
SGJ	Dannys Auto Sales Llc	85246282
SJY	Five Star Motors Of Lafayette Inc	84014583
SJY	Five Star Motors Of Lafayette Inc	86223369
SKW	Osburn's Auto, Llc	83769563
SKW	Osburn's Auto, Llc	83937495
SKW	Osburn's Auto, Llc	83968657
SKW	Osburn's Auto, Llc	84038561
SKW	Osburn's Auto, Llc	84604833
SKZ	Gladiator Cars Llc	83948190
SKZ	Gladiator Cars Llc	84455483
SKZ	Gladiator Cars Llc	84542194
SKZ	Gladiator Cars Llc	84541794
SKZ	Gladiator Cars Llc	84418500
SKZ	Gladiator Cars Llc	84278543
SLS	Jean's Auto Sales, Llc	82854422
SMK	Autodrive Llc	84432999
SMK	Autodrive Llc	84446457
SMK	Autodrive Llc	85049554
SMK	Autodrive Llc	84972866
SMK	Autodrive Llc	84853029
SMK	Autodrive Llc	84944132
SMK	Autodrive Llc	84293934
SMK	Autodrive Llc	85001957
SMK	Autodrive Llc	85168998
SMS	Lux Cars Auto Outlet Llc	84390471
SMZ	Strong Automotive Group, Inc	86054718
SMZ	Strong Automotive Group, Inc	86245572
SND	Goodman Auto Center Inc	82862629
SND	Goodman Auto Center Inc	83289344
SND	Goodman Auto Center Inc	82985557

SND	Goodman Auto Center Inc	82902429
SND	Goodman Auto Center Inc	83321582
SND	Goodman Auto Center Inc	82840588
SND	Goodman Auto Center Inc	82951559
SNJ	Klean Motors Llc	84705293
SNJ	Klean Motors Llc	83973989
SNJ	Klean Motors Llc	84599893
SNZ	Gn Auto Llc	83428922
SNZ	Gn Auto Llc	84450588
SNZ	Gn Auto Llc	82889681
SNZ	Gn Auto Llc	84395908
SPA	Ronald Thomas	83762190
SPG	Hemming Motor Company Llc	83813385
SPG	Hemming Motor Company Llc	85647470
SPG	Hemming Motor Company Llc	85486456
SPG	Hemming Motor Company Llc	85692673
SPG	Hemming Motor Company Llc	85787022
SPG	Hemming Motor Company Llc	85641374
SPG	Hemming Motor Company Llc	85273703
SPG	Hemming Motor Company Llc	84801308
SPG	Hemming Motor Company Llc	85160818
SPG	Hemming Motor Company Llc	85685610
SPG	Hemming Motor Company Llc	85141536
SPN	Adil Aboussif	83759236
SPN	Adil Aboussif	83718400
SQB	Mac Motors Auto Sales Llc	83513828
SQV	Blessed Janet, Llc	83810129
SRT	Real Deal Auto Inc	85083128
SRT	Real Deal Auto Inc	84893816
SRT	Real Deal Auto Inc	84940871
SRT	Real Deal Auto Inc	85069286
SRT	Real Deal Auto Inc	84927836
SRT	Real Deal Auto Inc	84910285
SRT	Real Deal Auto Inc	84507155
SRT	Real Deal Auto Inc	84908737
SSM	Carolyn Rutherford	85537495
SSP	Honest Ds Auto Sales Llc	85026087
SSY	Terrell Auto Sales Inc	83037924
SSY	Terrell Auto Sales Inc	82973181
SSY	Terrell Auto Sales Inc	82908046
SSY	Terrell Auto Sales Inc	83142580
SSY	Terrell Auto Sales Inc	83068527
SSY	Terrell Auto Sales Inc	83029963
SSY	Terrell Auto Sales Inc	83078122
SSY	Terrell Auto Sales Inc	82920081
SSY	Terrell Auto Sales Inc	83151508
SSY	Terrell Auto Sales Inc	83083653
SSY	Terrell Auto Sales Inc	83018474
SSY	Terrell Auto Sales Inc	83016943
SSY	Terrell Auto Sales Inc	82984050
SSY	Terrell Auto Sales Inc	82979231
SSY	Terrell Auto Sales Inc	82965453
SSY	Terrell Auto Sales Inc	82976517
SSY	Terrell Auto Sales Inc	82968217
SSY	Terrell Auto Sales Inc	82966691
SSY	Terrell Auto Sales Inc	82929304
SSY	Terrell Auto Sales Inc	82889973
SSY	Terrell Auto Sales Inc	82903479
SSY	Terrell Auto Sales Inc	83072062
SSY	Terrell Auto Sales Inc	83030409
SSY	Terrell Auto Sales Inc	83031170
SSY	Terrell Auto Sales Inc	83159550

STF	El Shaddai Motors Llc	86791363
SUB	Option 1 Properties, Llc	84805567
SUB	Option 1 Properties, Llc	84661449
SUB	Option 1 Properties, Llc	84559038
SUL	Sanai Motors Llc	83721912
SVW	Clutch Auto Brokers Llc	88103510
SVW	Clutch Auto Brokers Llc	88818737
SVW	Clutch Auto Brokers Llc	88778476
SVW	Clutch Auto Brokers Llc	88512399
SVW	Clutch Auto Brokers Llc	88527702
SVW	Clutch Auto Brokers Llc	88694520
SVW	Clutch Auto Brokers Llc	88529967
SVW	Clutch Auto Brokers Llc	88616867
SVW	Clutch Auto Brokers Llc	88599063
SVW	Clutch Auto Brokers Llc	88769115
SVW	Clutch Auto Brokers Llc	88708082
SVW	Clutch Auto Brokers Llc	88774847
SVX	Carmac Credit Inc	86769649
SVX	Carmac Credit Inc	86944532
SVX	Carmac Credit Inc	86676567
SVX	Carmac Credit Inc	86829346
SVX	Carmac Credit Inc	86639858
SWB	Auto Depot Of Williamstown Llc	83147964
SWB	Auto Depot Of Williamstown Llc	82994556
SXB	Blas Rodolfo Murillo	84772720
SXP	Nasim Amirgholi	83770582
SXP	Nasim Amirgholi	83770635
SXP	Nasim Amirgholi	83848528
SXP	Nasim Amirgholi	84100462
SXP	Nasim Amirgholi	84087749
SXP	Nasim Amirgholi	84103225
SXR	Mpv Corporation	85264639
SXR	Mpv Corporation	85290435
SXR	Mpv Corporation	85316747
SXR	Mpv Corporation	85269912
SXR	Mpv Corporation	85028280
SXR	Mpv Corporation	84680339
SXR	Mpv Corporation	85914883
SXV	Saleh Ayyeh	83224000
SXV	Saleh Ayyeh	84354966
SXV	Saleh Ayyeh	84121268
SXV	Saleh Ayyeh	84181918
SXV	Saleh Ayyeh	83240729
SXV	Saleh Ayyeh	84172393
SXV	Saleh Ayyeh	84071654
SXV	Saleh Ayyeh	83766743
SXV	Saleh Ayyeh	84081787
SYK	Tc Auto Sales Llc	84862004
SYK	Tc Auto Sales Llc	84840538
SYK	Tc Auto Sales Llc	83396470
SZQ	Delpha Lorrean McClendon	83817944
SZQ	Delpha Lorrean McClendon	84073939
SZQ	Delpha Lorrean McClendon	84148831
SZQ	Delpha Lorrean McClendon	84088667
SZQ	Delpha Lorrean McClendon	84356739
SZQ	Delpha Lorrean McClendon	84600993
SZQ	Delpha Lorrean McClendon	84122066
SZQ	Delpha Lorrean McClendon	84861987
SZQ	Delpha Lorrean McClendon	84774679
SZQ	Delpha Lorrean McClendon	84796960
SZQ	Delpha Lorrean McClendon	84013946

SZQ	Delpha Lorrean McClendon	84247174
SZQ	Delpha Lorrean McClendon	84427805
SZQ	Delpha Lorrean McClendon	84382355
T007	Ss Auto, Inc.	92459842
T29	Blue Diamond Auto Sales Corp 1	83366184
T29	Blue Diamond Auto Sales Corp 1	83130397
T2B	Ivan F Hancock Enterprises Llc	83705159
T3B	National Auto Credit Llc	83097557
T3B	National Auto Credit Llc	83269556
T3B	National Auto Credit Llc	83358366
T3B	National Auto Credit Llc	83461284
T3B	National Auto Credit Llc	83501578
T3B	National Auto Credit Llc	83270759
T3B	National Auto Credit Llc	83349221
T3V	Rogers Motors, Inc	83406910
T6G	Scottrock Motors Llc	87295191
T6Q	2 Car Guys Llc	84517623
T6Q	2 Car Guys Llc	84606751
T6Q	2 Car Guys Llc	85130695
T6W	Customer First Autogroup Inc	83869413
T7F	Ideal Motors Of Tampa Inc	83825825
T7F	Ideal Motors Of Tampa Inc	83647384
T7F	Ideal Motors Of Tampa Inc	83654116
T7F	Ideal Motors Of Tampa Inc	83798022
T7F	Ideal Motors Of Tampa Inc	83391960
T7F	Ideal Motors Of Tampa Inc	83616635
T7F	Ideal Motors Of Tampa Inc	83429490
T7F	Ideal Motors Of Tampa Inc	83491583
T7P	Super Auto Llc	84151390
T7P	Super Auto Llc	84049813
T7R	Teresa Guzman, Janet Mckee	85849102
T8N	Executive Auto Group Inc	91754362
T8S	Boundless Ventures Of Georgia Llc	86419928
T8S	Boundless Ventures Of Georgia Llc	86843366
T8S	Boundless Ventures Of Georgia Llc	86731909
T8S	Boundless Ventures Of Georgia Llc	87066791
T8S	Boundless Ventures Of Georgia Llc	86818707
T8S	Boundless Ventures Of Georgia Llc	86735665
T8S	Boundless Ventures Of Georgia Llc	86587876
T8S	Boundless Ventures Of Georgia Llc	87066809
TBN	Dale Paules	85266805
TBN	Dale Paules	84972427
TBN	Dale Paules	85239637
TBN	Dale Paules	85116899
TBN	Dale Paules	85112370
TCA	Karma Motors Inc	83779298
TCA	Karma Motors Inc	85024450
TCW	Liliam Abelina Hernandez	85841743
TDS	International Auto Sales, Inc	83873007
TDS	International Auto Sales, Inc	83786447
TDS	International Auto Sales, Inc	83724987
TDS	International Auto Sales, Inc	83482289
TDS	International Auto Sales, Inc	84041388
TDU	Dealz N Wheelz Llc	85905118
TF1	Phil Long Valucar Llc	84255798
TF2	Chris Brooks Motorsports Inc	85362947
TF2	Chris Brooks Motorsports Inc	84943603
TF5	B And M Motors Llc	83884061

THW	B & L Foreign Car Llc	88491210
TJT	Bristol Auto Llc	84754158
TKS	Buy-Rite Car Sales, Llc	84649625
TKS	Buy-Rite Car Sales, Llc	84814916
TLH	Ez Own Auto Inc	83809683
TMX	A-One Auto Sales, Llc	84180006
TMX	A-One Auto Sales, Llc	84134924
TMX	A-One Auto Sales, Llc	83862028
TMX	A-One Auto Sales, Llc	83673925
TMX	A-One Auto Sales, Llc	84031715
TPC	Pape K Ndaw	84807137
TPC	Pape K Ndaw	84867562
TPD	1st Choice Motors Llc	84174164
TPD	1st Choice Motors Llc	84149493
TPD	1st Choice Motors Llc	84229451
TPD	1st Choice Motors Llc	84152328
TPD	1st Choice Motors Llc	84376374
TPD	1st Choice Motors Llc	84373721
TPD	1st Choice Motors Llc	84316377
TPD	1st Choice Motors Llc	84293317
TPD	1st Choice Motors Llc	84187957
TPD	1st Choice Motors Llc	84123968
TPD	1st Choice Motors Llc	84150963
TPD	1st Choice Motors Llc	84057591
TPD	1st Choice Motors Llc	84069164
TPD	1st Choice Motors Llc	84028854
TPD	1st Choice Motors Llc	84037965
TPD	1st Choice Motors Llc	83947661
TPD	1st Choice Motors Llc	83864854
TPD	1st Choice Motors Llc	83866289
TPD	1st Choice Motors Llc	83866818
TPD	1st Choice Motors Llc	83848066
TPD	1st Choice Motors Llc	83847456
TPD	1st Choice Motors Llc	83832208
TPD	1st Choice Motors Llc	83795040
TPD	1st Choice Motors Llc	83795600
TPD	1st Choice Motors Llc	83781509
TPD	1st Choice Motors Llc	83771124
TPD	1st Choice Motors Llc	83770104
TPD	1st Choice Motors Llc	83750571
TPR	Scott Enterprises Of Tennessee Llc	85961052
TPR	Scott Enterprises Of Tennessee Llc	85714100
TQP	Cti Auto Finance Llc	83490622
TQP	Cti Auto Finance Llc	83498248
TRH	Autoway Car Sales Llc	84302682
TRW	Prentzmatz Llc	84464227
TS2	Uag Fayetteville I, Llc	79363018
TSM	Mo-Pac Llc	84339425
TSM	Mo-Pac Llc	84233375
TSM	Mo-Pac Llc	84458774
TSM	Mo-Pac Llc	84391940
TSM	Mo-Pac Llc	84584749
TSM	Mo-Pac Llc	84427432
TSM	Mo-Pac Llc	84151627
TSM	Mo-Pac Llc	84450681
TSM	Mo-Pac Llc	84209980
TSM	Mo-Pac Llc	84492794
TT1	Trotter Ford, Inc.	81920802
TT1	Trotter Ford, Inc.	82369639
TUP	Dennis Parham	84869457
TUP	Dennis Parham	85488664

TUP	Dennis Parham	85029291
TUP	Dennis Parham	85260429
TVG	Nassco International Llc	85531073
TVG	Nassco International Llc	85484007
TVG	Nassco International Llc	85429501
TVG	Nassco International Llc	85571507
TVG	Nassco International Llc	85543799
TVG	Nassco International Llc	85517489
TVG	Nassco International Llc	85513372
TVG	Nassco International Llc	85329764
TVG	Nassco International Llc	85477392
TVG	Nassco International Llc	85513386
TVH	Auto Exchange Usa, Llc	86396737
TVT	Nova Auto Sales Llc	83590502
TVT	Nova Auto Sales Llc	83941145
TYG	Sign & Drive Corp	84972009
TYG	Sign & Drive Corp	85038351
TYG	Sign & Drive Corp	85095938
TYG	Sign & Drive Corp	85343950
TYG	Sign & Drive Corp	84956550
TYG	Sign & Drive Corp	85094584
TYM	Stephen D Rennells	84239113
TYM	Stephen D Rennells	84178611
TZS	H&y Automotive Group Inc	89644462
U1M	Kayz Keys Auto Wholesalez Llc	84531162
U1M	Kayz Keys Auto Wholesalez Llc	84486574
U1M	Kayz Keys Auto Wholesalez Llc	84219842
U1M	Kayz Keys Auto Wholesalez Llc	84218445
U1M	Kayz Keys Auto Wholesalez Llc	84274168
U1Y	Awab Motors Corporation	83995207
U2T	Magic Auto Sale Llc	85609912
U2T	Magic Auto Sale Llc	85362045
U4D	Toms Toys Inc	87727090
U4D	Toms Toys Inc	87896695
U4D	Toms Toys Inc	87913193
U4T	DI Auto Sales Llc	85701565
U4T	DI Auto Sales Llc	85083179
U5G	Alabama Auto Expo Llc	84006260
U5G	Alabama Auto Expo Llc	83815943
U5G	Alabama Auto Expo Llc	83800163
U5G	Alabama Auto Expo Llc	84027694
U5Q	2 Guys Selling Cars Llc	86722077
U5Q	2 Guys Selling Cars Llc	86955888
U6F	C.W. Auto Sales Llc	83874466
U6G	Twist Family Motors Llc	83770670
U6G	Twist Family Motors Llc	83787529
U6L	Carolina Autos Llc	85634084
U7B	Lion King Llc	83924492
U7B	Lion King Llc	83823877
U7B	Lion King Llc	83982576
U7P	Vale Autosales Llc	83848666
U7W	Thee Platinum Automotives Llc	85257949
U7W	Thee Platinum Automotives Llc	86527300
U8P	Smartbuy Select Automotive Network Llc	83906391
U8P	Smartbuy Select Automotive Network Llc	84373287
U8W	Quality Automotive Group Llc li	84292598
U9Y	Singh Motorsports, Llc	84819712
UAG	Apple Auto Wholersalers Of Fl, Corp.	84836811
UAG	Apple Auto Wholersalers Of Fl, Corp.	85293289

UAX	Kotse Inc	83847782
UAX	Kotse Inc	84342162
UAX	Kotse Inc	83907756
UAX	Kotse Inc	83952369
UAX	Kotse Inc	84330526
UBK	#1 Phoenix Auto Exchange, Llc	84432616
UBK	#1 Phoenix Auto Exchange, Llc	86448721
UBM	Quest Motors Inc	84770139
UDL	Patriot Motors Inc	86122815
UFG	High Sierra Auto Sales Llc	84374437
UGF	P & C Auto Group Llc	85361784
UGN	Downtown L A. Motors, Nissan, Lp	87037066
UGR	Dynamic Motorsports Llc	85245591
UHZ	Extreme Auto Llc	84553599
UHZ	Extreme Auto Llc	85262412
UHZ	Extreme Auto Llc	85128377
UHZ	Extreme Auto Llc	85144609
UHZ	Extreme Auto Llc	85275044
UJF	Blevins Auto Sales Llc	84016569
UJF	Blevins Auto Sales Llc	84318349
UJF	Blevins Auto Sales Llc	84275555
UJF	Blevins Auto Sales Llc	84281674
UJF	Blevins Auto Sales Llc	84016214
UJZ	Geneva Murray	84310856
UJZ	Geneva Murray	84180025
UJZ	Geneva Murray	84318308
UJZ	Geneva Murray	84132350
UJZ	Geneva Murray	84124102
UK2	Carite Of Michigan, Llc	85284609
UK2	Carite Of Michigan, Llc	85346533
UKB	Carite Of Michigan, Llc	85148196
UKD	Carite Of Michigan, Llc	85501985
UKD	Carite Of Michigan, Llc	85522126
UNH	E & L Auto Llc	84840816
UNH	E & L Auto Llc	84831743
UNH	E & L Auto Llc	84828398
UNH	E & L Auto Llc	84677574
UNH	E & L Auto Llc	84553220
UNH	E & L Auto Llc	84277385
UNH	E & L Auto Llc	84278179
UNH	E & L Auto Llc	84088810
UNH	E & L Auto Llc	84849876
UNX	Network Of Dealers Llc	86944935
UNX	Network Of Dealers Llc	87282382
UQH	Latino Auto Sales Llc	85486088
UQH	Latino Auto Sales Llc	85395895
URC	Columbus Auto Sales, Llc	84984318
URC	Columbus Auto Sales, Llc	85207732
URC	Columbus Auto Sales, Llc	85333537
URC	Columbus Auto Sales, Llc	85318801
URQ	Jack Russell Mcdaniel	85456782
URQ	Jack Russell Mcdaniel	85362000
URQ	Jack Russell Mcdaniel	85365256
URS	Denzil Ray Fulton	85303171
URT	Hd Motors Inc	85976080
URT	Hd Motors Inc	86386342
URT	Hd Motors Inc	86207556
URT	Hd Motors Inc	85972781
URT	Hd Motors Inc	85854811
URT	Hd Motors Inc	86034377
URT	Hd Motors Inc	85995747
USQ	Credit Max Auto Finance Inc	84818116

UVA	Platinum Air, Inc.	88278318
UVA	Platinum Air, Inc.	89047193
UVA	Platinum Air, Inc.	88824112
UVA	Platinum Air, Inc.	89320645
UVC	Mft Auction Llc	84631762
UVC	Mft Auction Llc	86250058
UVC	Mft Auction Llc	85520157
UVJ	Paul Blanco's Good Car Company Tampa/Pinellas Park	84761959
UVJ	Paul Blanco's Good Car Company Tampa/Pinellas Park	84395109
UVN	Paul Blanco's Good Car Company Tampa/Pinellas Park	84391119
UVN	Paul Blanco's Good Car Company Tampa/Pinellas Park	84405834
UVV	Dream Cars Unlimited Inc	84498105
UVV	Dream Cars Unlimited Inc	84644340
UVV	Dream Cars Unlimited Inc	84652785
UVV	Dream Cars Unlimited Inc	84590008
UVV	Dream Cars Unlimited Inc	84661367
UVW	Rich Auto Group Llc	84720163
UVW	Rich Auto Group Llc	84708585
UVW	Rich Auto Group Llc	85195177
UVW	Rich Auto Group Llc	85248698
UVW	Rich Auto Group Llc	84652140
UVW	Rich Auto Group Llc	84833665
UVW	Rich Auto Group Llc	84761872
UVW	Rich Auto Group Llc	85314265
UVW	Rich Auto Group Llc	85628817
UVW	Rich Auto Group Llc	85031601
UVW	Rich Auto Group Llc	85013673
UVW	Rich Auto Group Llc	85081349
UVW	Rich Auto Group Llc	84964687
UVW	Rich Auto Group Llc	84888684
UVW	Rich Auto Group Llc	84845925
UVW	Rich Auto Group Llc	84870203
UWH	Big Dog Group, Llc	85911557
UWH	Big Dog Group, Llc	85406589
UWH	Big Dog Group, Llc	85817382
UWH	Big Dog Group, Llc	85865682
UWH	Big Dog Group, Llc	85563012
UWH	Big Dog Group, Llc	85522316
UWH	Big Dog Group, Llc	85975034
UWH	Big Dog Group, Llc	85687367
UWJ	Buy Smart Motors Llc	86428257
UXM	Mr Beaufort Auto Sales Llc	85488102
UZV	Car-Starz Auto Sales Llc	84731753
UZV	Car-Starz Auto Sales Llc	84791606
UZV	Car-Starz Auto Sales Llc	84987935
UZV	Car-Starz Auto Sales Llc	84864778
UZV	Car-Starz Auto Sales Llc	84666667
UZV	Car-Starz Auto Sales Llc	84701046
UZV	Car-Starz Auto Sales Llc	84714891
UZV	Car-Starz Auto Sales Llc	84918803
UZV	Car-Starz Auto Sales Llc	84848030
UZV	Car-Starz Auto Sales Llc	84749986
UZV	Car-Starz Auto Sales Llc	84712124
UZZ	Patton's Automotive Llc	87269633
V0H	Edwards Automotive Llc	86888062
V0H	Edwards Automotive Llc	86849307
V1V	Blue Collar Auto Sales & Detailing Llc	85109538

V4A	Suzan2007 Llc	86049421
V5J	Linder Auto Center Llc	85237555
V5V	Premier Auto Choice Llc	86566230
V7H	Towpath Enterprises Inc	84970516
V7V	United Auto Credit Br, Inc.	86462345
V7V	United Auto Credit Br, Inc.	86376392
V7V	United Auto Credit Br, Inc.	86302095
V7V	United Auto Credit Br, Inc.	86190795
V7V	United Auto Credit Br, Inc.	86095063
V7V	United Auto Credit Br, Inc.	85865423
V7V	United Auto Credit Br, Inc.	86054702
V7V	United Auto Credit Br, Inc.	85912300
V7V	United Auto Credit Br, Inc.	85869691
V7V	United Auto Credit Br, Inc.	85919407
V7V	United Auto Credit Br, Inc.	85869644
V7V	United Auto Credit Br, Inc.	86491660
V7V	United Auto Credit Br, Inc.	86547793
V7V	United Auto Credit Br, Inc.	86276973
V7V	United Auto Credit Br, Inc.	86698716
V7V	United Auto Credit Br, Inc.	86568064
V7V	United Auto Credit Br, Inc.	86562004
V8S	Xpress Automotive Sales Llc	85632158
V8T	J And M Motor Sales Llc	86282024
V8T	J And M Motor Sales Llc	85975755
V9L	Lacoste Group, Inc	85715056
V9L	Lacoste Group, Inc	85738818
V9L	Lacoste Group, Inc	85528683
V9L	Lacoste Group, Inc	85746338
V9L	Lacoste Group, Inc	85714770
V9L	Lacoste Group, Inc	85594234
V9L	Lacoste Group, Inc	85469758
VAJ	Elite Auto Galary Inc	85681589
VBN	B.R.M. Motors Llc	85840088
VBN	B.R.M. Motors Llc	86592146
VDA	Super Deal Auto Sales Inc	84785879
VDA	Super Deal Auto Sales Inc	85159351
VDQ	Siver Auto Sales Inc	84672991
VDU	150 Motors Llc	88515076
VFK	Penn State Auto Sales Inc	84963069
VFN	Jay Wolfe Imports Of Springfield Inc.	85954006
VHC	A Team Auto Brokers Llc	87113860
VHC	A Team Auto Brokers Llc	87035729
VHC	A Team Auto Brokers Llc	87110298
VHC	A Team Auto Brokers Llc	87464755
VHY	Steven Wheatley	85788531
VHY	Steven Wheatley	86501969
VJA	Usa Auto Collection Llc	85423366
VJK	Aj's Auto Inc	85697957
VJT	Endee Auto Sales, Inc	88084452
VJT	Endee Auto Sales, Inc	88328381
VKJ	Clarity Motors	85144892
VKJ	Clarity Motors	85443739
VLD	New Generation Automotives Llc	85622348
VLD	New Generation Automotives Llc	85242246
VLD	New Generation Automotives Llc	85188441
VLD	New Generation Automotives Llc	85329513
VLD	New Generation Automotives Llc	85763015
VLD	New Generation Automotives Llc	85742339
VLD	New Generation Automotives Llc	85132879

VLD	New Generation Automotives Llc	85555359
VLD	New Generation Automotives Llc	85588142
VLD	New Generation Automotives Llc	85247204
VLD	New Generation Automotives Llc	85529576
VLD	New Generation Automotives Llc	85425214
VLD	New Generation Automotives Llc	85367819
VLD	New Generation Automotives Llc	85596659
VLD	New Generation Automotives Llc	85425072
VLD	New Generation Automotives Llc	85297225
VLF	Stephanie Flores	88171654
VMW	Rt 46 Empire Corp	85095399
VQR	Prime Time Auto Sales Llc	85908992
VQR	Prime Time Auto Sales Llc	85910256
VQR	Prime Time Auto Sales Llc	86035578
VQV	Rally Motorsports Llc	85276633
VQV	Rally Motorsports Llc	85144608
VQV	Rally Motorsports Llc	85406448
VQV	Rally Motorsports Llc	85472847
VQZ	Elite Auto Group Llc	86200315
VRY	Paul Blanco's Good Car Company Reno	85483139
VVL	Smart Deal Auto, Llc	85426587
VVL	Smart Deal Auto, Llc	85743206
VVL	Smart Deal Auto, Llc	85444071
VXL	Paul Blancos Good Car Company Inland Empire	86835715
VYM	Royce A Holley	85833528
VYX	Jivani Motor Works Llc	85578757
VYX	Jivani Motor Works Llc	85765118
VYX	Jivani Motor Works Llc	86116560
VYX	Jivani Motor Works Llc	86112452
VYX	Jivani Motor Works Llc	85284234
VYX	Jivani Motor Works Llc	86121936
VYX	Jivani Motor Works Llc	85488182
VYX	Jivani Motor Works Llc	85972783
VYX	Jivani Motor Works Llc	86086363
VYX	Jivani Motor Works Llc	85826008
W0P	Autohaus Of Durham Llc	85199448
W0W	Bmmj Inc	90157103
W1D	Grady Kerr Motors	86492149
W4D	Carpaq Inc	85252359
W4D	Carpaq Inc	85511806
W7X	Freedom Autos, Llc	85332055
W7X	Freedom Autos, Llc	85301607
W7X	Freedom Autos, Llc	85287347
W7X	Freedom Autos, Llc	85283020
W7X	Freedom Autos, Llc	85255751
W7X	Freedom Autos, Llc	85230275
W7X	Freedom Autos, Llc	85192993
W7X	Freedom Autos, Llc	85209899
W7X	Freedom Autos, Llc	85221227
W7X	Freedom Autos, Llc	85221999
W7X	Freedom Autos, Llc	85193030
W7X	Freedom Autos, Llc	85267036
W7Y	Kingdom Automotive Group, Inc	85220762
W8D	Clarity Motors	85211582
W8D	Clarity Motors	85190264
W8D	Clarity Motors	85183713
W8D	Clarity Motors	86339919
W8F	Raudel Diaz	85137418

WBQ	Auto Deals Llc	85293967
WCW	Amy Amanda Foster	86538497
WCW	Amy Amanda Foster	86280295
WCW	Amy Amanda Foster	86831269
WDT	Central City Preowned Llc	86125065
WDT	Central City Preowned Llc	86173551
WDT	Central City Preowned Llc	86122372
WDT	Central City Preowned Llc	86072771
WDT	Central City Preowned Llc	85923558
WDT	Central City Preowned Llc	86097941
WDT	Central City Preowned Llc	86142388
WDT	Central City Preowned Llc	85854412
WDT	Central City Preowned Llc	86090515
WDT	Central City Preowned Llc	86119546
WDT	Central City Preowned Llc	85980610
WDT	Central City Preowned Llc	86029732
WDT	Central City Preowned Llc	86118807
WDT	Central City Preowned Llc	85556336
WDT	Central City Preowned Llc	86122555
WE4	Shirley Auto Group Inc	88756918
WE4	Shirley Auto Group Inc	88517338
WE4	Shirley Auto Group Inc	88654174
WHH	O2 Cars Inc	85638195
WHH	O2 Cars Inc	85966052
WHH	O2 Cars Inc	85843847
WHH	O2 Cars Inc	86059945
WHH	O2 Cars Inc	85286229
WJG	Quick Cars Llc	87160032
WK1	The Mint Leasing America Inc	87347511
WK1	The Mint Leasing America Inc	87820740
WK5	Able Auto Sales, Llc	85833692
WKA	Ivory Business Llc	85676945
WKA	Ivory Business Llc	85344704
WKA	Ivory Business Llc	85680625
WKF	Buckeye Motor Group Ltd	86549128
WKF	Buckeye Motor Group Ltd	87444072
WKF	Buckeye Motor Group Ltd	87744826
WKF	Buckeye Motor Group Ltd	87544062
WKF	Buckeye Motor Group Ltd	87738384
WKF	Buckeye Motor Group Ltd	87665328
WKF	Buckeye Motor Group Ltd	87651121
WKF	Buckeye Motor Group Ltd	87570971
WKF	Buckeye Motor Group Ltd	87548943
WKF	Buckeye Motor Group Ltd	87513914
WKF	Buckeye Motor Group Ltd	87535625
WMF	Union South Auto Llc	85799684
WNK	Yes Car Sales And Rentals Inc	87414785
WSS	Wholesale Automotive Group, Llc	86381035
WUS	Cars For Us Llc	86230527
WUS	Cars For Us Llc	85710965
WUS	Cars For Us Llc	87029843
WUS	Cars For Us Llc	86725939
WWW	Cumberland County Motors Inc	87945797
WXZ	Regions Auto Remarketing Llc	86999832
WXZ	Regions Auto Remarketing Llc	86951180
WXZ	Regions Auto Remarketing Llc	86840377
WXZ	Regions Auto Remarketing Llc	86935189
WXZ	Regions Auto Remarketing Llc	86336586
WXZ	Regions Auto Remarketing Llc	86864044
WXZ	Regions Auto Remarketing Llc	86876634
WXZ	Regions Auto Remarketing Llc	86819262
WXZ	Regions Auto Remarketing Llc	86770111

WXZ	Regions Auto Remarketing Llc	87085782
WXZ	Regions Auto Remarketing Llc	86645776
WXZ	Regions Auto Remarketing Llc	87005403
WXZ	Regions Auto Remarketing Llc	87083252
WXZ	Regions Auto Remarketing Llc	87093366
WXZ	Regions Auto Remarketing Llc	87137709
WXZ	Regions Auto Remarketing Llc	86928059
WXZ	Regions Auto Remarketing Llc	87141236
X2H	Seven28 Holdings Llc	85682066
X2T	Legacy Autos Llc	86468861
X2T	Legacy Autos Llc	86600985
X2T	Legacy Autos Llc	86274235
X2T	Legacy Autos Llc	86297376
X2T	Legacy Autos Llc	86412030
X2T	Legacy Autos Llc	86413009
X3L	Dnf Auto Sales Inc	88282291
X3L	Dnf Auto Sales Inc	88124092
X3X	Helene Scott	86728283
X3Z	Isaac Koya li	86238257
X3Z	Isaac Koya li	86375271
X3Z	Isaac Koya li	85751728
X3Z	Isaac Koya li	86342673
X3Z	Isaac Koya li	86297528
X3Z	Isaac Koya li	86172745
X3Z	Isaac Koya li	85994918
X3Z	Isaac Koya li	85994827
X3Z	Isaac Koya li	86448707
X3Z	Isaac Koya li	86635409
X3Z	Isaac Koya li	86605505
X3Z	Isaac Koya li	85856384
X3Z	Isaac Koya li	86327068
X3Z	Isaac Koya li	86321304
X7B	Kiva Sales Llc	87081103
X7B	Kiva Sales Llc	87081103
X7V	The Car Guys Llc	85905839
X7V	The Car Guys Llc	86194259
X7V	The Car Guys Llc	85779630
X7V	The Car Guys Llc	86447673
X7V	The Car Guys Llc	86319575
X7V	The Car Guys Llc	86355794
X7V	The Car Guys Llc	86265898
X7V	The Car Guys Llc	86133839
X7V	The Car Guys Llc	86106070
XCN	Villa Autoplex Inc	86963734
XCN	Villa Autoplex Inc	86419076
XCN	Villa Autoplex Inc	86754775
XCN	Villa Autoplex Inc	86966976
XCN	Villa Autoplex Inc	87158888
XCN	Villa Autoplex Inc	86993044
XCN	Villa Autoplex Inc	87061360
XCN	Villa Autoplex Inc	87349368
XCN	Villa Autoplex Inc	87478888
XCW	Bmc Auto Group, Llc	90937283
XFF	A.L.E. Solutions, Llc	87245645
XFF	A.L.E. Solutions, Llc	87507045
XFF	A.L.E. Solutions, Llc	87289672
XFF	A.L.E. Solutions, Llc	87017539
XFF	A.L.E. Solutions, Llc	87019609
XFF	A.L.E. Solutions, Llc	86925183
XFF	A.L.E. Solutions, Llc	87642427
XFF	A.L.E. Solutions, Llc	87591348
XFF	A.L.E. Solutions, Llc	87540025

XFF	A.L.E. Solutions, Llc	87544278
XFF	A.L.E. Solutions, Llc	87484104
XFF	A.L.E. Solutions, Llc	87465685
XFF	A.L.E. Solutions, Llc	87276621
XFF	A.L.E. Solutions, Llc	87173413
XFF	A.L.E. Solutions, Llc	87143115
XFF	A.L.E. Solutions, Llc	87099154
XFF	A.L.E. Solutions, Llc	86920462
XFF	A.L.E. Solutions, Llc	87605208
XFF	A.L.E. Solutions, Llc	87544110
XFF	A.L.E. Solutions, Llc	87557406
XKY	Auto Giants Inc	87028941
XPZ	T G Used Auto Sales Llc	87686889
XPZ	T G Used Auto Sales Llc	87622303
XPZ	T G Used Auto Sales Llc	87613362
XPZ	T G Used Auto Sales Llc	88082850
XPZ	T G Used Auto Sales Llc	88061904
XPZ	T G Used Auto Sales Llc	87811789
XQN	Geremia Gil	88117643
XQN	Geremia Gil	88259486
XS5	Trucks Cars And Beyond Inc	87690363
XS5	Trucks Cars And Beyond Inc	88192120
XS5	Trucks Cars And Beyond Inc	88175998
XS5	Trucks Cars And Beyond Inc	88332427
XS5	Trucks Cars And Beyond Inc	88612755
XS5	Trucks Cars And Beyond Inc	88517719
XS5	Trucks Cars And Beyond Inc	88563731
XS5	Trucks Cars And Beyond Inc	88759847
XS5	Trucks Cars And Beyond Inc	88805032
XSU	Napleton St Louis Imports Llc	89719601
XSU	Napleton St Louis Imports Llc	89751404
XSU	Napleton St Louis Imports Llc	89984755
XTL	Keys Automotives Llc	87463939
XWJ	Charles Antonino And John Antonino	88509801
XWV	Aku Group Corp.	86219300
XWV	Aku Group Corp.	86551572
XWV	Aku Group Corp.	86481577
XWV	Aku Group Corp.	86859657
XWV	Aku Group Corp.	86730124
XWV	Aku Group Corp.	86647311
XWV	Aku Group Corp.	86654696
XWV	Aku Group Corp.	86725119
XWV	Aku Group Corp.	86359501
XWX	Rides 4 Less Motors Llc	86367201
XWX	Rides 4 Less Motors Llc	86916640
XWX	Rides 4 Less Motors Llc	86910975
XWX	Rides 4 Less Motors Llc	86723812
XYV	Approved Auto Sales Of Spartanburg Llc	86299888
XYV	Approved Auto Sales Of Spartanburg Llc	86304474
XZ9	Crimson Auto Sales	86975676
Y0R	Naptown Auto Group Inc	86546182
Y0R	Naptown Auto Group Inc	86546269
Y1W	Wartson Autos Llc	86512999
Y43	J. P. Auto's, Inc.	88127635
Y5Y	4 Us Auto Sales, Llc	86738175
Y5Y	4 Us Auto Sales, Llc	86922186
Y5Y	4 Us Auto Sales, Llc	86907306
Y5Y	4 Us Auto Sales, Llc	86740473
Y5Y	4 Us Auto Sales, Llc	86773960
Y5Y	4 Us Auto Sales, Llc	86689654
Y5Y	4 Us Auto Sales, Llc	86684995

Y5Y	4 Us Auto Sales, Llc	86680582
Y5Y	4 Us Auto Sales, Llc	86922218
Y5Y	4 Us Auto Sales, Llc	86582184
Y6Z	Otocity Llc	87401079
Y7G	Cars Solutions Auto Sales Inc.	88281861
Y9Q	Jetway Motors Llc	87801115
Y9Q	Jetway Motors Llc	88337479
YDJ	Smart Automotive Llc	89540907
YDJ	Smart Automotive Llc	89005321
YDJ	Smart Automotive Llc	89030140
YDJ	Smart Automotive Llc	89121499
YDJ	Smart Automotive Llc	89055904
YDW	Direct Net Auto, Llc	88669997
YDW	Direct Net Auto, Llc	88785220
YGJ	Exclusive Auto Brokers Llc	86965488
YKU	Metro Truck Sales Llc	88083387
YMQ	Capitol Automotive Inc	90621293
YMS	Simple Auto Sales Llc	88279154
YMS	Simple Auto Sales Llc	88281875
YMS	Simple Auto Sales Llc	88735692
YMS	Simple Auto Sales Llc	88673040
YMS	Simple Auto Sales Llc	88894412
YMS	Simple Auto Sales Llc	88765930
YMS	Simple Auto Sales Llc	88619416
YMS	Simple Auto Sales Llc	88700595
YMS	Simple Auto Sales Llc	88770873
YMS	Simple Auto Sales Llc	88485725
YPD	Jim Burke Automotive Inc	88462362
YSV	Global Auto Exchange Inc	87990434
YW2	We Finance Auto Sales, Inc.	76628471
Z0U	Tampa Car Collections, Llc	86875988
Z0U	Tampa Car Collections, Llc	87048891
Z0U	Tampa Car Collections, Llc	87175700
Z1L	Tri Majestic Llc	86913960
Z1L	Tri Majestic Llc	87057257
Z1L	Tri Majestic Llc	87172079
Z1L	Tri Majestic Llc	87009336
Z1L	Tri Majestic Llc	87226686
Z1N	Reh Capital Investments Llc	87682441
Z1N	Reh Capital Investments Llc	87511607
Z1N	Reh Capital Investments Llc	87742805
Z1N	Reh Capital Investments Llc	87393818
Z1N	Reh Capital Investments Llc	87389005
Z1N	Reh Capital Investments Llc	87374170
Z1N	Reh Capital Investments Llc	87518003
Z1N	Reh Capital Investments Llc	87512457
Z1N	Reh Capital Investments Llc	87661292
Z1N	Reh Capital Investments Llc	87734971
Z1N	Reh Capital Investments Llc	87683170
Z2V	Imperial Automotive Group, Llc	87272159
Z2V	Imperial Automotive Group, Llc	88715917
Z2V	Imperial Automotive Group, Llc	88716120
Z2V	Imperial Automotive Group, Llc	88622238
Z2V	Imperial Automotive Group, Llc	88578835
Z2V	Imperial Automotive Group, Llc	88587679
Z2V	Imperial Automotive Group, Llc	88573169
Z4H	Auto Maxx Atlanta Llc	89977069
Z4H	Auto Maxx Atlanta Llc	89688800
Z7L	Budget Auto Sales, Inc.	86979899
Z7L	Budget Auto Sales, Inc.	87389534
Z7L	Budget Auto Sales, Inc.	87006853
Z7L	Budget Auto Sales, Inc.	87458832

ZCW	Orange Auto Sales Llc	87846308
ZFH	Walters Used Car And Truck Superstore, Llc	89693799
ZFH	Walters Used Car And Truck Superstore, Llc	90938306
ZG4	Vallejo Cjd Llc	88157265
ZG4	Vallejo Cjd Llc	88519415
ZG4	Vallejo Cjd Llc	88961796
ZG6	Maverick Auto Group 2 Llc	88492157
ZG6	Maverick Auto Group 2 Llc	88726860
ZHJ	Yes Auto Llc	87253022
ZHJ	Yes Auto Llc	87429231
ZHJ	Yes Auto Llc	87189955
ZHJ	Yes Auto Llc	87306931
ZHJ	Yes Auto Llc	87189955
ZHJ	Yes Auto Llc	87353739
ZHJ	Yes Auto Llc	87484407
ZHJ	Yes Auto Llc	87471582
ZHJ	Yes Auto Llc	87307162
ZHJ	Yes Auto Llc	87367934
ZHJ	Yes Auto Llc	87566387
ZHJ	Yes Auto Llc	87733136
ZHJ	Yes Auto Llc	87652176
ZHJ	Yes Auto Llc	87566288
ZHJ	Yes Auto Llc	87599110
ZJ2	Executive Finance Llc	87632354
ZJ2	Executive Finance Llc	87634968
ZJ2	Executive Finance Llc	87872524
ZJ2	Executive Finance Llc	87768857
ZJ2	Executive Finance Llc	87964558
ZJ2	Executive Finance Llc	87960306
ZJ2	Executive Finance Llc	87902000
ZJ2	Executive Finance Llc	87981786
ZJ2	Executive Finance Llc	87825947
ZJ2	Executive Finance Llc	87968494
ZJ2	Executive Finance Llc	87990171
ZJ2	Executive Finance Llc	88020674
ZJ2	Executive Finance Llc	88156627
ZJ2	Executive Finance Llc	88163736
ZJ2	Executive Finance Llc	88229492
ZJT	Merrillville Auto Connection Inc	88564246
ZJT	Merrillville Auto Connection Inc	88733292
ZJZ	Miller Motors Llc	90967713
ZJZ	Miller Motors Llc	91570360
ZJZ	Miller Motors Llc	91476130
ZJZ	Miller Motors Llc	91437453
ZJZ	Miller Motors Llc	90883514
ZKS	Bayird Inc	87450422
ZKU	Jerel A Pittman	88378447
ZKU	Jerel A Pittman	88569056
ZKU	Jerel A Pittman	88587414
ZKU	Jerel A Pittman	88614112
ZKU	Jerel A Pittman	88665270
ZKU	Jerel A Pittman	88810006
ZKU	Jerel A Pittman	88822728
ZKU	Jerel A Pittman	88780643
ZKU	Jerel A Pittman	88863876
ZKU	Jerel A Pittman	89086739
ZPQ	Miami Auto Store Corp	90145734
ZQM	Bmi Imports Llc	87463770
ZRQ	Fairburn Automotive Inc	88118607
ZRQ	Fairburn Automotive Inc	88294404
ZRQ	Fairburn Automotive Inc	88576818

ZS8	Motion Auto Plaza Llc	87740656
ZWK	East Coast Electronics Llc	91950251
ZXR	Price Motors Of Nc Llc	87865113
ZXR	Price Motors Of Nc Llc	87809107
ZXR	Price Motors Of Nc Llc	87876310
ZXR	Price Motors Of Nc Llc	87743817
ZXZ	Madison Auto Sales Llc	90034607
ZXZ	Madison Auto Sales Llc	90631019
ZXZ	Madison Auto Sales Llc	90393216
ZYJ	Franklin Automotive, Llc	88313298
ZYJ	Franklin Automotive, Llc	87898118
ZYJ	Franklin Automotive, Llc	88035505



Dealer ID	Dealer Name	Account Number
X3L	Dnf Auto Sales Inc	88282291
X3L	Dnf Auto Sales Inc	88124092
3LD	Custom Auto Sales Llc	88285756
3LD	Custom Auto Sales Llc	88287051
3LD	Custom Auto Sales Llc	87686755
R8J	5 Star Motors Llc	89482201
R8J	5 Star Motors Llc	86438441
Z2V	Imperial Automotive Group, Llc	88715917
Z2V	Imperial Automotive Group, Llc	88716120
Z2V	Imperial Automotive Group, Llc	88622238
Z2V	Imperial Automotive Group, Llc	88578835
ZJ2	Executive Finance Llc	88229492
ZJ2	Executive Finance Llc	88020674
ZKU	Jerel A Pittman	89086739
ZKU	Jerel A Pittman	88863876
ZKU	Jerel A Pittman	88810006
ZKU	Jerel A Pittman	88822728
WKF	Buckeye Motor Group Ltd	87738384
WKF	Buckeye Motor Group Ltd	87744826
WKF	Buckeye Motor Group Ltd	86549128
PFT	North Coast Car Credit Llc	88189128
PFT	North Coast Car Credit Llc	88178749



Lot ID	Dealership Name	Loan ID
TYF	ALLENTOWN CAR CONNECTION, INC	94068542
TYF	ALLENTOWN CAR CONNECTION, INC	94216688
TYF	ALLENTOWN CAR CONNECTION, INC	94129400
A2HT	TKO MILLEDGEVILLE LLC	94303640
A2HT	TKO MILLEDGEVILLE LLC	94353100
A2HT	TKO MILLEDGEVILLE LLC	94366510
A2HT	TKO MILLEDGEVILLE LLC	94364398
A0GV	Annoited Used Cars Llc	89141164
A0GV	Annoited Used Cars Llc	89080269
A0GV	Annoited Used Cars Llc	89092094
A0GV	Annoited Used Cars Llc	88996224
A0GV	Annoited Used Cars Llc	88938861
F6Z	Auto Giants Inc	84003277
F6Z	Auto Giants Inc	84416589
F6Z	Auto Giants Inc	91462194
F6Z	Auto Giants Inc	89022744
F6Z	Auto Giants Inc	88964581
F6Z	Auto Giants Inc	88964581
YSV	Global Auto Exchange Inc	87004411
YSV	Global Auto Exchange Inc	87815673
RLT	Global Auto Sales & Brokers Inc	87090518
RLT	Global Auto Sales & Brokers Inc	87127814
FMX	I Deal Autos Llc	88305045
FMX	I Deal Autos Llc	88095465
FMX	I Deal Autos Llc	88307138
FMX	I Deal Autos Llc	88095465
MZU	Merits Auto & Vans Sale	86849262
MZU	Merits Auto & Vans Sale	88352622
MZU	Merits Auto & Vans Sale	88247910
MZU	Merits Auto & Vans Sale	88133535
TPS	Any Credit Auto Sales, LLC	91966994
TPS	Any Credit Auto Sales, LLC	91548003
TPS	Any Credit Auto Sales, LLC	91552750
TPS	Any Credit Auto Sales, LLC	91609161
TPS	Any Credit Auto Sales, LLC	91678496
TPS	Any Credit Auto Sales, LLC	91663198
TPS	Any Credit Auto Sales, LLC	91609161
TPS	Any Credit Auto Sales, LLC	91663198
L02M	Axis Motors Llc	93556889
A4M2	Cars 2 Go Llc	92630800
A00M	Kline Chevrolet Sales Corp	94127623
A0M0	New South Inc	93861619
T007	Ss Auto, Inc.	93818765
YHQ	The Auto Dealer Inc	92483431

Exhibit 2

Exhibit 3

Exhibit 4

1700 G Street, NW
Washington, DC 20552



April 22, 2019

Via Certified Mail

Credit Acceptance Corporation
25505 West Twelve Mile Road
Southfield, MI 48034

Re: Civil Investigative Demand served on Credit Acceptance Corp. on April 22, 2019

To Whom It May Concern:

Attached is a civil investigative demand (CID) issued to you by the Bureau of Consumer Financial Protection (Bureau) under 12 C.F.R. § 1080.6 and § 1052(c) of the Dodd-Frank Wall Street Reform and Consumer Protection Act, 12 U.S.C. § 5562. The Bureau is currently seeking information for a non-public investigation, the purpose of which is explained on the attached CID cover sheet. Please note:

1. **Contact Bureau counsel, Emily Sachs, 202-435-9424, emily.sachs@cfpb.gov, as soon as possible to schedule an initial meeting that is required to be held within 10 calendar days of receipt of this CID.** During this meeting, you must discuss and attempt to resolve all issues regarding the CID, including timely compliance. The rules require that you make available at this meeting personnel with the knowledge necessary to resolve issues; such individuals may include, for example, information-technology professionals. Please be prepared to discuss your planned compliance schedule, including any proposed changes that might reduce your cost or burden while still giving the Bureau the information it needs.
2. **You must retain, and suspend any procedures that may result in the destruction of, documents, information, or tangible things that are in any way relevant to the investigation, as described in the CID's Notification of Purpose.** You are required to prevent the destruction of relevant material irrespective of whether you believe such material is protected from future disclosure or discovery by privilege or otherwise. *See* 18 U.S.C. §§ 1505, 1519.

Please contact Bureau counsel as soon as possible to set up an initial meeting, which must be held within 10 calendar days of receipt of this CID. We appreciate your cooperation.

consumerfinance.gov

Sincerely,

A handwritten signature in blue ink that reads "Emily Sachs". The signature is fluid and cursive, with the first name "Emily" and last name "Sachs" clearly distinguishable.

Emily Sachs
Enforcement Attorney

Attachment



United States of America
Bureau of Consumer Financial Protection

Civil Investigative Demand

To **Credit Acceptance Corporation**
25505 West Twelve Mile Road
Southfield, MI 48034

This demand is issued pursuant to Section 1052 of the Consumer Financial Protection Act of 2010 and 12 C.F.R. Part 1080 to determine whether there is or has been a violation of any laws enforced by the Bureau of Consumer Financial Protection.

Action Required (choose all that apply)

☒ **Appear and Provide Oral Testimony**

Location of Investigational Hearing	Date and Time of Investigational Hearing
United States Attorney's Office 211 W. Fort Street, Suite 2001 Detroit, MI 48226	6/25/19, 9:00am; 6/26/19, 9:00am
	Bureau Investigators Emily Sachs; Vanessa Buchko

☒ **Produce Documents and/or Tangible Things, as set forth in the attached document, by the following date** 05/23/2019

☒ **Provide Written Reports and/or Answers to Questions, as set forth in the attached document, by the following date** 05/23/2019

Notification of Purpose Pursuant to 12 C.F.R. § 1080.5

The purpose of this investigation is to determine whether auto lenders or associated persons, in connection with originating auto loans (including marketing and selling products ancillary to such loans), collecting debts, or consumer reporting, have: (1) collected amounts consumers did not owe, failed to notify consumers of collections lawsuits filed against them, or made false or misleading representations to consumers in a manner that is unfair, deceptive, or abusive in violation of §§ 1031 and 1036 of the Consumer Financial Protection Act of 2010, 12 U.S.C. §§ 5531, 5536; (2) failed to perform the duties of a furnisher of information to consumer reporting agencies in a manner that violates the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq., principally § 1681s-2, or Regulation V, principally Subpart E; or (3) failed to follow the requirements for providing disclosures to consumers or used advertisements with prohibited content in a manner that violates Regulation Z, 12 C.F.R. Part 1026, principally Subpart C, implementing the Truth in Lending Act, 15 U.S.C. 1601 et seq. The purpose of this investigation is also to determine whether Bureau action to obtain legal or equitable relief would be in the public interest.

Custodian / Deputy Custodian

John Wells / Cheryl Goodwin
Bureau of Consumer Financial Protection
1700 G Street NW, Washington, DC 20552

Bureau Counsel

Emily Sachs; Vanessa Buchko

Date Issued

04/22/2019

Signature **John Wells**

Digitally signed by John Wells
Date: 2019.04.22
09:53:38 -04'00'

Name / Title **John Wells, Deputy Enforcement Director**

Service

The delivery of this demand to you by any method prescribed by the Consumer Financial Protection Act of 2010, 12 U.S.C. § 5562, is legal service. If you fail to comply with this demand, the Bureau may seek a court order requiring your compliance.

Travel Expenses

Request a travel voucher to claim compensation to which you are entitled as a witness before the Bureau pursuant to Section 1052 of the Consumer Financial Protection Act of 2010, 12 U.S.C. § 5562.

Right to Regulatory Enforcement Fairness

The Bureau is committed to fair regulatory enforcement. If you are a small business under Small Business Administration standards, you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

Paperwork Reduction Act

This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

**CIVIL INVESTIGATIVE DEMAND FOR
PRODUCTION OF DOCUMENTS, WRITTEN REPORTS,
ANSWERS TO INTERROGATORIES, AND ORAL TESTIMONY**

I. Requests.

Interrogatories

1. Describe using a chart or diagram the corporate structure of the Company, including any parent/subsidiary relationships, and any changes during the Applicable Period. For each subsidiary, state the date created, the percent ownership by the Company, the nature of the subsidiary's business, and the state or country of incorporation.
2. Describe using a chart or diagram the organizational structure of the Company and any changes during the Applicable Period. For every department or division, provide a brief description of its function and the current number of employees.
3. For each state in which the Company operates, list any trade names used by the Company in that state, any licenses held by the Company in that state, and the address of any Company offices in that state.
4. Identify all of the Company's Service Providers (including all Dealers, GPS-SID Providers, Repossession Agents, Auction Retailers, Collection Attorneys, and Collection Firms) and for each Service Provider describe:
 - a. The nature of the services provided;
 - b. The departments, divisions, and job positions at the Company that oversee and manage the relationship with the Service Provider;
 - c. How the Service Provider and the Company communicate, including any shared databases, systems, and regular reports;
 - d. If applicable, how the Company monitors, evaluates, and audits the Service Provider, including frequency and any rating systems used;
 - e. If applicable, how the Company compensates the Service Provider, including how the amount of any fees, commissions, or bonuses are determined; and
 - f. If applicable, what types of fees or payments the Service Provider pays or makes to the Company.
5. Identify and describe all Ancillary Products including:
 - a. The coverage, benefits, or services provided by the product;
 - b. A description of the role of the Company, of the Dealer, and of any other parties involved in offering, providing, or marketing the product to consumers;
 - c. The cost of the product to consumers, including all payments and fees;
 - d. Any underwriting or other requirements for consumers to purchase the products; and
 - e. How the Company, Dealers, and other parties are each compensated for the product.

6. Describe the Company's Collection Activities, including:
 - a. What Collection Activities the Company engages in;
 - b. Which Collection Activities are conducted by the Company and which Collection Activities are conducted by Service Providers or any other third party; and
 - c. All fees that the Company or its Service Providers charge consumers as a result of the Company's Collection Activities, including but not limited to late fees, litigation or attorneys' fees, and fees associated with repossessions.
7. Describe the sources of the Company's revenue from its Lending Activities, including whether the revenue comes from consumers, Dealers, or other parties (and if so, what other parties), and identify for each revenue source the amount of gross revenue received for each year during the Applicable Period. The revenue sources described should include at least the following, as well as any other revenue source:
 - a. Servicing fees earned as a result of servicing Dealer Loans;
 - b. Finance charge income from Purchased Loans;
 - c. Fees from Vehicle Service Contracts;
 - d. Fees from Guaranteed Asset Protection;
 - e. Late fees;
 - f. Fees associated with repossessions;
 - g. GPS-SID fees;
 - h. Dealer monthly program fees;
 - i. Dealer enrollment fees; and
 - j. Dealer support product and services fees.
8. Describe the systems used by the Company to ensure the accuracy and integrity of the Company's Consumer Reporting Activities, including:
 - a. The name and version of the technology system(s) the Company has used and currently uses to convert account information into Metro 2 for purposes of furnishing consumer information to a CRA;
 - b. The name(s) of the persons currently or previously responsible for ensuring that consumer account information is converted correctly and without errors into the Metro 2 format;
 - c. If the Company developed the systems referenced in subpart (a) in-house, identify the persons involved in the development;
 - d. If the Company purchased, licensed, or otherwise obtained the systems referenced in subpart (a) from a third party, identify the entit(ies) from which the systems were purchased, licensed, or obtained; and
 - e. If the Company purchased, licensed, or otherwise obtained the systems referenced in subpart (a) from a third party, indicate whether the Company customized the system(s) and, if so, identify any employees or third-parties involved in the customization.
9. Identify all databases used by the Company for its Lending Activities and Consumer Reporting Activities. For each database provide the following information:
 - a. The database system name, commercial software name (if different from the system name) and version;
 - b. The dates during which each database is or was in use;

- c. The names and descriptions of the data fields contained in the database;
 - d. The data type (e.g., date/time; integer; text) in each data field;
 - e. The business purposes for which the Company uses the database;
 - f. A description of how the database interacts with other systems the Company uses, such as file systems, other databases, etc.;
 - g. Whether the database holds attachments, such as image, audio, or PDF files, and a description of those attachments;
 - h. A description of any regular or standard reports generated from the database and the frequency with which such reports are generated;
 - i. Whether the data stored in the database can be exported to Microsoft Excel or other readily-available spreadsheet or database programs; and
 - j. A description of the frequency with which the database is archived and/or backed up and the method by which it is archived and/or backed up.
10. Identify all Persons currently or previously responsible for the following, including the time periods during which each person identified had such responsibilities:
- a. Creating, approving, maintaining, implementing, overseeing, updating, and ensuring compliance with the policies and procedures relating to the Company's compliance with the FCRA and the Furnisher Rule, 12 C.F.R. §§ 1022.40–1022.43;
 - b. Overseeing the Company's furnishing to CRAs;
 - c. Overseeing the Company's handling of Direct Disputes or Indirect Disputes; and
 - d. Conducting investigations into Direct Disputes or Indirect Disputes.
11. Identify all letter templates that the Company has used to communicate to consumers the results of investigations of Direct Disputes, including the Bates number of the template in your production and the time period during which the letter template was in use by the Company. (These letter templates are requested in Request for Document 15.)
12. State the Dispute Address used by the Company and describe each method used by the Company to provide the Dispute Address to consumers, including each form or template communication used by the Company to provide the Dispute Address to consumers. Include for each form or template communication:
- a. The Bates number of each such form or template communication in your production (these communications are requested in Request for Document 16);
 - b. The period during which each form or template communication was sent to consumers; and
 - c. Any consumers regarding whom the Company furnished information who were not sent any of the form or template communications.
13. Identify and describe each type of report that the Company has generated, requested, or produced from the e-OSCAR system in response to Request for Written Report 6 and Request for Documents 18. For each type of report, in addition to the identifying information, including Bates numbers, provide the following information:
- a. The procedures used to generate or request the report;
 - b. The employee(s) responsible for generating or requesting the report;

- c. How frequently the Company generates or requests the report; and
 - d. Any policy governing retention or destruction of the report in the Company's files.
14. Identify by name and last known mailing address, phone number, and e-mail address, all former employees who worked at the Company for six or more months in any position relating to any Lending Activities or Consumer Reporting Activities and who were terminated or resigned on or after January 1, 2017, and state the last title or position held, department, and the date of, and reasons for, his or her departure.
 15. Describe the Company's policies and procedures related to document retention, data retention, and data backup. If policies vary by document or data type, describe the relevant subject of the policy.
 16. If, for any Request for Documents, there are categories of documents that would be responsive to this CID, but they were destroyed, mislaid, transferred, deleted, altered, or over-written, identify the categories of documents and date and circumstances of their unavailability.
 17. Identify all persons who participated in responding to this CID and the specific tasks performed by each person.

Requests for Written Reports

Produce all reports in tab-delimited text format using double-quote-escaped text fields when necessary, except produce in Excel any report originally created in Excel.

1. List all Dealers, GPS-SID Providers, Repossession Agents, Auction Retailers, Collection Attorneys, and Collection Firms, and for each provide the following:
 - a. To the extent not addressed in response to Interrogatory 4, a brief description of the services provided to the Company;
 - b. The date each Service Provider began and, if applicable, ceased providing services to the Company;
 - c. The amount paid by the Company to each Service Provider in every month in the Applicable Period;
 - d. The amount paid by each Service Provider to the Company in every month in the Applicable Period; and
 - e. The number of new accounts associated with each Service Provider in every month in the Applicable Period, specifically (i) the number of Loans originated by each Dealer; (ii) the number of Starter Interrupt Devices provided by each GPS-SID Provider; (iii) the number of vehicles assigned to each Repossession Agent for repossession; (iv) the number of vehicles sold at or by each Auction Retailer; and (v) the number of accounts sent to each Collection Attorney and Collection Firm.

2. Provide the following for each Dealer for each year in the Applicable Period:
 - a. The state(s) in which the Dealer operates;
 - b. The total number of Loans;
 - c. The total amount of Loans, separated into principal, interest, and each fee;
 - d. The total number of Dealer Loans;
 - e. The total amount of Dealer Loans, separated into principal, interest, and each fee;
 - f. The total number of Purchased Loans;
 - g. The total amount of Purchased Loans, separated into principal, interest, and each fee;
 - h. The total number of Loans provided with vehicle service contracts;
 - i. The total number of Loans provided with guaranteed asset protection (GAP);
 - j. The total number of Loans where the vehicle was equipped with a Starter Interrupt Device;
 - k. The total number of Loans where the vehicle was repossessed;
 - l. The total number of Loans where the vehicle was sold by the Company after repossession;
 - m. The total amount of fees assessed relating to the repossession of the vehicle and the sale of the vehicle after repossession;
 - n. The total payments by consumers on Loans, separated into principal, interest, and each fee;
 - o. The total payments by consumers on Loans prior to repossession, separated into principal, interest, and each fee;
 - p. The total amount obtained by the Company through the sale of vehicles after repossession;
 - q. The total number of Loans where the Company filed a lawsuit to collect the debt;
 - r. The total number of Loans where the Company filed for garnishment; and
 - s. The total amount obtained by the Company through garnishments.
3. Provide the following information for each Collection Firm and each Collection Attorney who is not a part of a Collection Firm, relating to lawsuits filed on behalf of the Company against consumers to collect a debt, for each year in the Applicable Period:
 - a. The state(s) in which the Collection Attorney or Collection Firm operates;
 - b. The total number of lawsuits filed;
 - c. The total number of lawsuits that resulted in a default judgment;
 - d. The total number of lawsuits that resulted in a default judgment due to non-appearance by the consumer;
 - e. The total number of lawsuits where the consumer entered an appearance;
 - f. The total number of lawsuits where the consumer was represented by an attorney;
 - g. The total number of default judgments obtained that were challenged by a consumer asserting lack of service;
 - h. The total number of lawsuits that the Company voluntarily dismissed;
 - i. The total number of lawsuits that were dismissed by the Court;
 - j. The total number of lawsuits that were resolved through an agreed judgment or by a settlement;

- k. The total number of lawsuits that were decided by trial or summary judgment;
 - l. The total number of lawsuits that were decided in favor of the consumer at trial or summary judgment;
 - m. The total number of lawsuits that were decided in favor of the Company at trial or summary judgment;
 - n. The total number of lawsuits where the Company filed for garnishment;
 - o. The total number of lawsuits where the Company obtained a garnishment order; and
 - p. The total amount garnished from consumers.
4. For each Direct Dispute during the Applicable Period, provide the following information:
- a. Unique consumer identification number;
 - b. Account number;
 - c. Consumer name;
 - d. Consumer address;
 - e. Consumer phone number;
 - f. Consumer e-mail address;
 - g. Date the Company received the Direct Dispute;
 - h. Text of the Direct Dispute (or, if not available, provide a description of the nature or subject matter of the Direct Dispute);
 - i. Name of Company employee(s) who investigated the Direct Dispute;
 - j. Date the Direct Dispute was resolved;
 - k. How the Direct Dispute was resolved (i.e. the outcome of the Direct Dispute);
 - l. Date the Company communicated the outcome of the Direct Dispute to the consumer;
 - m. Date the Company communicated that the account was disputed to the CRAs;
 - n. Date the Company communicated the outcome of the Direct Dispute to the CRAs, if applicable;
 - o. How the Company communicated the outcome of the Direct Dispute to the CRAs, if applicable (e.g. through an Automated Universal Data form or some other means); and
 - p. What the Company communicated to the CRAs concerning the Direct Dispute, including whether a verification, correction, or deletion of information was sent to the CRAs, if applicable.
5. For each Indirect Dispute during the Applicable Period, provide the following information:
- a. Unique consumer identification number;
 - b. Account number;
 - c. Consumer name;
 - d. Consumer address;
 - e. Consumer phone number;
 - f. Consumer e-mail address;
 - g. The CRA from which the Indirect Dispute was received;
 - h. Date the Company received the Indirect Dispute;
 - i. Text of the Indirect Dispute (or, if not available, provide a description of the

- nature or subject matter of the Indirect Dispute);
 - j. Name of Company employee(s) who investigated the Indirect Dispute;
 - k. Date the Indirect Dispute was resolved;
 - l. How the Indirect Dispute was resolved (i.e. the outcome of the Indirect Dispute);
 - m. Date the Company communicated the outcome of the Indirect Dispute to the CRA; and
 - n. What the Company communicated to the CRA concerning the Indirect Dispute, including whether a verification, correction, or deletion of information was sent to the CRAs, if applicable.
6. Produce all reports that can be generated or requested by the Company from the e-OSCAR system, and include all data available for all fields available for the maximum time period available for each report, including at least the 120 days preceding May 1, 2019 ("Report Date"). This should include, but not be limited to, all Automated Consumer Dispute Verification (ACDV) archive reports, all ACDV activity reports, all dispute response notification reports, all Automated Universal Data (AUD) reports, all audit reports, all block notification reports, all user activity reports, all exception reports, and all management reports. Reports may be produced as CSV files if that is the format in which they were obtained from e-OSCAR.

Requests for Documents

1. One copy of each version of each policy, procedure, manual, Advertisement, template document, training document, script, talking points document, frequently asked questions document, and other written instructions, provided by the Company to Dealers.
2. One copy of each version of each policy, procedure, manual, template document, training document, script, talking points document, frequently asked questions document, and other written instructions, provided by the Company to Repossession Agents.
3. One copy of each version of each policy, procedure, manual, template document, training document, script, talking points document, frequently asked questions document, and other written instructions, provided by the Company to Auction Retailers.
4. One copy of each version of each policy, procedure, manual, template document, training document, script, talking points document, frequently asked questions document, and other written instructions, provided by the Company to Collection Attorneys and Collection Firms.
5. One copy of each version of each policy, procedure, manual, template document, training document, script, talking points document, frequently asked questions document, and other written instructions relating to Collection Activities that was not produced in response to Document Requests 1-4.

6. One copy of each version of each policy and procedure relating to monitoring, evaluating, auditing, and compensating any Service Providers that was not produced in response to Document Requests 1-4.
7. One copy of each version of each policy, procedure, manual, Advertisement, template document, training document, script, talking points document, frequently asked questions document, and other written instructions relating to Ancillary Products that was not produced in response to Document Requests 1-4.
8. One copy of each version of each policy, procedure, training document, manual, and other guidance document relating to Consumer Reporting Activities.
9. One copy of all non-identical contracts or agreements between the Company and a Service Provider in effect since January 1, 2017, regardless of when it was signed.
10. One copy of all non-identical template or form agreements or contracts with consumers for Loans, including any terms and conditions, addenda, disclosures, or any other documents provided to consumers concerning the Loan.
11. One copy of all non-identical template or form agreements or contracts for Ancillary Products, including any terms and conditions, addenda, disclosures, or any other documents provided to consumers concerning the Ancillary Product.
12. All court filings, proofs of service, and account documents (including applications, agreements, collection notes, written correspondence, and payment histories), for all lawsuits filed by or on behalf of the Company against consumers to collect a debt between: May 15-19, 2017; September 24-28, 2018; and February 4-8, 2019. Produce responsive documents such that the documents for each lawsuit are grouped together.
13. All audits, reviews, evaluations, self-assessments, compliance reports, monitoring reports, and investigation reports, performed by or on behalf of the Company, relating to Service Providers.
14. All audits, reviews, evaluations, self-assessments, compliance reports, monitoring reports, and investigation reports, performed by or on behalf of the Company or a CRA, concerning the Company's Consumer Reporting Activities or the Company's compliance with the FCRA, the Furnisher Rule, 12 C.F.R. §§ 1022.40–1022.43, and Appendix E to 12 C.F.R. Part 1022.
15. Unique versions of each letter template identified in response to Interrogatory 11.
16. Unique versions of each communication identified in response to Interrogatory 12.
17. All image files held by e-OSCAR that are associated with your responses to Written Report Request 6, and a tab-delimited text file associating each image file with its corresponding entry in your responses to Written Report Request 6.

18. All reports from the e-OSCAR system, including exception reports, maintained in the files of the Company's division responsible for overseeing compliance with the FCRA, the Furnisher Rule, 12 C.F.R. §§ 1022.40–1022.43, and Appendix E to 12 C.F.R. Part 1022.
19. For each Metro 2 Output File furnished to the CRAs between January 1, 2017 and May 1, 2019:
 - a. Produce the Output Files in Metro 2 426 format, either variable or fixed, using the ASCII character set. The Files should be produced as .txt files.
 - b. Redact the following from each Output File by replacing all characters with x's:
 - Base Segment Social Security Number
 - Base Segment Address Line 1
 - Base Segment Address Line 2
 - Base Segment Surname
 - J1 Segment Social Security Number
 - J1 Segment Surname
 - J2 Segment Social Security Number
 - J2 Segment Address Line 1
 - J2 Segment Address Line 2
 - J2 Segment Surname
20. One copy of each version of each policy, procedure, training document, manual, and other guidance document concerning the Company's compliance with the CFPB, the FCRA, the Furnisher Rule, 12 C.F.R. §§ 1022.40–1022.43, Appendix E to 12 C.F.R. Part 1022, state and federal laws prohibiting unfair, deceptive, or abusive practices, and any other federal consumer financial laws, including, but not limited to, the process for investigating, disciplining, or terminating employees and Service Providers suspected of failing to comply with the law or the Company's policies and procedures.

II. Topics for Hearing

1. The Company's organizational structure, including the general nature of the company's business operations and the operations of all parents, subsidiaries, unincorporated divisions, joint ventures, and affiliates.
2. The Company's supervisory and reporting structures.
3. The Company's management of and relationship with its Service Providers, including the nature of the services provided and how the Company oversees, compensates, and evaluates its Service Providers.
4. The Company's policies, practices, and procedures with respect to its Lending Activities, including:
 - a. How the Company and Dealers begin their relationships;
 - b. Any underwriting, advertising, marketing, pricing or other guidelines required or

- suggested by the Company to Dealers, including relating to how Dealers determine whether to provide a Loan, how Dealers determine the amount and terms of the Loan, what disclosures Dealers provide, how Dealers determine the price of the vehicle, and how Dealers market loans, vehicles, and Ancillary Products;
- c. The Company's approval process for Loans;
 - d. In what circumstances a Starter Interrupt Device is installed in a vehicle; and
 - e. How Dealers and the Company are each compensated as a result of the Loans.
5. The Company's policies, practices, and procedures with respect to its Collection Activities, including:
- a. What Collection Activities the Company engages in;
 - b. In what circumstances the Company offers payment plans or allows consumers to refinance their Loans;
 - c. Fees that the Company or its Service Providers charge consumers as a result of the Company's Collection Activities;
 - d. In what circumstances a Starter Interrupt Device is utilized and how it functions;
 - e. How the Company determines that a vehicle should be repossessed;
 - f. What steps the Company takes when repossessing a vehicle;
 - g. What steps the Company takes when selling a vehicle that has been repossessed;
 - h. How the Company determines when to file a lawsuit against a consumer; and
 - i. What steps the Company takes when filing a lawsuit against a consumer.
6. The Company's policies, practices, and procedures with respect to its Consumer Reporting Activities, including:
- a. Steps taken by the Company to ensure that the information furnished to a CRA is accurate and to identify information previously furnished to a CRA that may be incomplete, inaccurate, or outdated, including the Company's use of exception reports provided by a CRA;
 - b. The Company's policies, practices, and procedures to investigate, resolve, and provide consumers and CRAs with the results of investigations of Direct Disputes; and
 - c. The Company's policies, practices, and procedures to investigate, resolve, and provide the CRAs with the results of investigations of Indirect Disputes.

III. Definitions.

- A. **"Advertisement"** means any statement, illustration, depiction, or promotional material, whether in English or another language, that is designed to effect a sale or create interest in goods or services, regardless of where it appears.
- B. **"Ancillary Product"** means any product offered in connection with Loans, including vehicle service agreements, credit insurance, and guaranteed asset protection (GAP), that the Company offers consumers or provides Dealers with the ability to offer consumers.
- C. **"And"** and **"or"** must be construed both conjunctively and disjunctively.

- D. **“Any”** includes **“all,”** and **“all”** includes **“any.”**
- E. **“Auction Retailer”** means any Person that sells, or assists in selling, repossessed vehicles for or on behalf of the Company.
- F. **“Bureau”** means the Bureau of Consumer Financial Protection.
- G. **“CID”** means the Civil Investigative Demand, including the Requests, Definitions, and Instructions.
- H. **“Collection Activities”** means all activities related in any way to the Company’s efforts to collect debt either directly or indirectly, including through calls, letters, in-person visits, repossessions, use of starter interrupt devices, and litigation, by either Company employees or outside parties.
- I. **“Collection Attorney”** means any attorney (including but not limited to attorneys employed by the Company) that engages in Collection Activities on behalf of the Company.
- J. **“Collection Firm”** means any law firm that engages in Collection Activities on behalf of the company.
- K. **“Company”** or **“you”** or **“your”** means Credit Acceptance Corporation and any successor in interest, as well as its parent companies, wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates.
- L. **“Consumer Reporting Activities”** means all activities related in any way to the furnishing of Company account information relating to consumers to one or more Consumer Reporting Agency, either directly or indirectly through a third-party. This includes handling and investigating Direct Disputes and Indirect Disputes.
- M. **“Consumer Reporting Agency”** or **“CRA”** means “any person which, for monetary fees, dues, or on a nonprofit basis, regularly engages in whole or in part the practice of assembling or evaluating consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties, and which uses any means or facility of interstate commerce for the purpose of preparing or furnishing consumer reports,” as set forth in 15 U.S.C. § 1681a(f).
- N. **“Database”** means a collection of works, data or other materials arranged in a systematic or methodical way and individually accessible by electronic or other means.
- O. **“Dealer”** means any Person that offers loans to consumers that are originated by, serviced by, purchased by, or assigned to the Company.

P. **“Dealer Loans”** means all loans to consumers serviced – but not purchased – by the Company and has the same meaning as in the Company’s Form 10-K for 2018.

Q. **“Deputy Enforcement Director”** refers to a Deputy Assistant Director of the Office of Enforcement.

R. **“Direct Dispute”** means “a dispute submitted directly to a furnisher (including a furnisher that is a debt collector) by a consumer concerning the accuracy of any information contained in a consumer report and pertaining to an account or other relationship that the furnisher has or had with the consumer,” as set forth in 12 C.F.R. § 1022.41(b).

S. **“Dispute Address”** means the address of the Company at which it accepts Direct Dispute notices from consumers.

T. **“Document”** means any written matter of every type and description, including Electronically Stored Information. “Document” includes any non-identical copy (such as a draft or annotated copy) of another document.

U. **“Electronically Stored Information,”** or **“ESI,”** means the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise) of any electronically created or stored information, including but not limited to e-mail, instant messaging, videoconferencing, SMS, MMS, or other text messaging, and other electronic correspondence (whether active, archived, unsent, or in a sent or deleted-items folder), word-processing files, spreadsheets, databases, unorganized data, document metadata, presentation files, and sound recordings, regardless of how or where the information is stored, including if it is on a mobile device.

V. **“Enforcement Director”** refers to the Assistant Director of the Office of Enforcement.

W. **“Fair Credit Reporting Act”** or **“FCRA”** means the Fair Credit Reporting Act, 15 U.S.C. §§1681–1681x.

X. **“GPS-SID Provider”** means any Person that provides GPS Devices and/or Starter Interrupt Devices for use on vehicles financed by the Company.

Y. **“Identify”** means to provide: (a) for natural persons, their name, title or position, present business affiliation, present business address, e-mail address, and telephone number, or if a present business affiliation or present business address is not known, the last known business address, home address, e-mail address, and telephone number; (b) for businesses or other organizations, the name and address of the organization, and the name, address, e-mail address, and telephone number of contact person(s) for the organization; and (c) for documents, the title, date, authors, recipients, Bates numbers, if applicable, type of document or some other means of identifying the document, and the present or last known location or custodian.

Z. **“Indirect Dispute”** means a consumer dispute that is sent to the Company by a Consumer Reporting Agency.

AA. **“Lending Activities”** means offering and providing Loans and Ancillary Products to consumers, and all activities incident to doing so, including lending, marketing, originating, brokering, underwriting, servicing, refinancing, restructuring, extending, or collecting. Lending Activities includes all Collection Activities.

BB. **“Loan”** means any loan to a consumer that is originated by, serviced by, purchased by, or assigned to the Company.

CC. **“Metro 2”** means the Metro 2 format developed by the Consumer Data Industry Association that is the current industry standard format for furnishing information to consumer reporting agencies.

DD. **“Person”** means an individual, partnership, company, corporation, association (incorporated or unincorporated), trust, estate, cooperative organization, or other entity.

EE. **“Purchased Loans”** means all loans to consumers purchased by the Company and has the same meaning as in the Company’s Form 10-K for 2018.

FF. **“Referring to”** or **“relating to”** means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, comprising, showing, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

GG. **“Repossession Agent”** means any Person that repossesses vehicles, or works with other Persons to repossess vehicles, for or on behalf of the Company. This includes any intermediaries between the Company and other Repossession Agents (e.g. Repossession Forwarders).

HH. **“Service Provider”** means “any person that provides a material service to [the Company] in connection with the offering or provision by [the Company] of a consumer financial product or service,” as set forth in 12 U.S.C. § 5481(26), including Dealers, GPS-SID Providers, Repossession Agents, Auction Retailers, Collection Attorneys, and Collection Firms.

II. **“Starter Interrupt Device”** means a device that allows a vehicle to be disabled remotely.

IV. **Instructions.**

A. **Sharing of Information:** This CID relates to a nonpublic, law-enforcement investigation being conducted by the Bureau. The Bureau may make its files available to other civil and criminal federal, state, or local law-enforcement agencies under 12 C.F.R.

§§ 1070.43(b)(1) and 1070.45(a)(5). Information you provide may be used in any civil or criminal proceeding by the Bureau or other agencies. As stated in 12 C.F.R. § 1080.14, information you provide in response to this CID is subject to the requirements and procedures relating to the disclosure of records and information set forth in 12 C.F.R. pt. 1070.

B. **Meet and Confer:** As stated in 12 C.F.R. § 1080.6(c), you must contact Enforcement Attorney **Emily Sachs** at **(202) 435-9424** as soon as possible to schedule a meeting (telephonic or in person) to discuss your response to the CID. The meeting must be held within **10** calendar days after you receive this CID or before the deadline for filing a petition to modify or set aside the CID, whichever is earlier.

C. **Applicable Period for Responsive Materials:** Unless otherwise directed, the applicable period for the request is January 1, 2017 to March 31, 2019.

D. **Privilege Claims:** If any material responsive to this CID is withheld on the grounds of privilege, you must make the privilege claim no later than the date set for the production of the material. As stated in 12 C.F.R. § 1080.8(a), any such claim must include a schedule of the documents, information, or tangible things withheld that states, for each:

1. its type, specific subject matter, and date;
2. the names, addresses, positions, and organizations of all authors and direct or indirect recipients;
3. the specific grounds for claiming the privilege;
4. the request to which the privileged document, information, or thing is responsive; and
5. its Bates number or range.

In addition, the person who submits the schedule and the attorney stating the grounds for the privilege must sign it. A person withholding material solely based on a claim of privilege must comply with the requirements of 12 C.F. R. § 1080.8 rather than file a petition for an order modifying or setting aside a demand under 12 C.F.R. § 1080.6(e). Please follow the enclosed Document Submission Standards for further instructions about producing redacted privileged documents.

E. **Document Retention:** Until you are notified otherwise, you are required to retain all documents and other tangible things that you used or relied on in responding to this CID. In addition, you must retain, and suspend any procedures that may result in the destruction of, documents, information, or tangible things that are in any way relevant to the investigation, as described in the CID's Notification of Purpose. You are required to prevent the destruction of relevant material irrespective of whether you believe such material is protected from future disclosure or discovery by privilege or otherwise. *See* 18 U.S.C. §§ 1505, 1519.

F. **Modification Requests:** If you believe that the scope of the search or response required by this CID can be narrowed consistent with the Bureau's need for documents or information, you are encouraged to discuss such possible modifications, including modifications of the requirements of these instructions, with Enforcement Attorney **Emily Sachs** at **(202) 435-9424**. Modifications must be agreed to in writing by the Enforcement Director or a Deputy Enforcement Director. 12 C.F.R. § 1080.6(d).

G. **Petition for Order Modifying or Setting Aside Demand:** Under 12 U.S.C. § 5562(f) and 12 C.F.R. § 1080.6(e), you may petition the Bureau for an order modifying or setting aside this CID. To file a petition, you must send it by e-mail to the Bureau's Executive Secretary at ExecSec@cfpb.gov, copying the Enforcement Director at Enforcement@cfpb.gov, within 20 calendar days of service of the CID or, if the return date is less than 20 calendar days after service, before the return date. The subject line of the e-mail must say "Petition to Modify or Set Aside Civil Investigative Demand." If a request for confidential treatment is filed, you must file a redacted public petition in addition to the unredacted petition. All requests for confidential treatment must be supported by a showing of good cause in light of applicable statutes, rules, Bureau orders, court orders, or other relevant authority.

H. **Certification:** The person to whom the CID is directed or, if it is directed to an entity, any person having knowledge of the facts and circumstances relating to the production, must certify that the response to this CID is true and complete. This certification must be made on the form declaration included with this CID.

I. **Scope of Search and Investigational Hearing:** This CID covers materials and information in your possession, custody, or control, including but not limited to documents in the possession, custody, or control of your attorneys, accountants, other agents or consultants, directors, officers, and employees.

J. **Procedures Governing Hearing:** This CID is issued under section 1052 of the Consumer Financial Protection Act, 12 U.S.C. § 5562. The taking of oral testimony pursuant to this CID will be conducted in conformity with that section and 12 C.F.R. §§ 1080.6(a)(4), 1080.7, and 1080.9.

K. **Designation of a Witness:** This CID requires oral testimony from an entity. Under 12 C.F.R. § 1080.6(a)(4)(ii), you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf. The individuals designated must testify about information known or reasonably available to you, and their testimony is binding on you. Your failure to designate a witness competent to testify about the topics described will be considered a failure to comply with this CID.

L. **Document Production:** The Bureau encourages the electronic production of all material responsive to this CID; please follow the enclosed Document Submission Standards.

All packages destined for Bureau offices should be addressed to:

Bureau of Consumer Financial Protection
Attention: Cheryl Goodwin, Enforcement, Office 8028-A.2
1700 G Street NW
Washington DC 20552

Please provide your intended method of production and any tracking numbers by e-mail or telephone to Enforcement Attorney **Emily Sachs** at **(202) 435-9424**.

M. **Document Identification:** Documents that may be responsive to more than one request of this CID need not be submitted more than once. All documents responsive to this CID must be accompanied by an index that identifies: (i) the name of each custodian of each responsive document; (ii) the corresponding Bates number or range used to identify that person's documents; and (iii) the request or requests to which each document responds.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information, sensitive health information of any individual, or Suspicious Activities Reports, please contact Enforcement Attorney **Emily Sachs** at **(202) 435-9424** before sending those materials to discuss ways to protect the information during production. You must encrypt electronic copies of such materials with encryption software acceptable to the Bureau. When submitting encrypted material, you must provide the encryption key, certificate, or passcode in a separate communication.

For purposes of this CID, sensitive personally identifiable information includes an individual's Social Security number alone or an individual's name, address, or phone number *in combination with* one or more of the following: date of birth, Social Security number, driver's-license number or other state-identification number, or a foreign country equivalent, passport number, financial-account number, credit-card number, or debit-card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Information Identification:** Each request for a written report or interrogatory in this CID must be answered separately and fully in writing under oath. All information submitted must clearly and precisely identify the request or requests to which it is responsive.

P. **Submission of Documents in lieu of Reports or Answers:** Documents in existence before your receipt of this CID that contain the information requested in any interrogatory may be submitted as part of or in lieu of an answer to the interrogatory. If you submit documents as part of or in lieu of an answer, you must clearly indicate the specific request to which the documents are responsive, and you must clearly identify

the specific portion of the documents that are responsive, including page, paragraph, and line numbers, as applicable.

Q. Declaration Certifying Records of Regularly Conducted Business

Activity: Attached is a Declaration Certifying Records of Regularly Conducted Business Activity, which may limit the need to subpoena you to testify at future proceedings to establish the admissibility of documents produced in response to this CID. Please execute this Declaration and provide it with your response.

R. All references to “**year**” or “**annual**” refer to the calendar year. Where information is requested “for each year,” provide it separately for each year; where yearly data is not available, provide responsive information for the calendar year to date, unless otherwise instructed.

S. Duty to Estimate: If you are unable to answer any interrogatory fully, supply such information as is available. Explain why such answer is incomplete, the efforts you made to obtain the information, and the source from which the complete answer may be obtained. If books and records that provide accurate answers are not available, enter best estimates and describe how the estimates were derived, including the sources or bases of such estimates. Estimated data should be followed by the notation “est.” If there is no reasonable way to make an estimate, provide an explanation.

CERTIFICATE OF COMPLIANCE

I, _____, pursuant to 28 U.S.C. § 1746, declare that:

1. I have confirmed that a diligent search has been made for all responsive documents and information in the possession, custody, or control of Credit Acceptance Corporation.
2. All of the documents and information identified through the search described in paragraph 1 above required by the Civil Investigative Demand dated April 22, 2019 that are within the possession, custody, or control of Credit Acceptance Corporation have been submitted to the Bureau custodian or deputy custodian identified in this Civil Investigative Demand.
3. If a document or tangible thing responsive to this Civil Investigative Demand has not been submitted, an interrogatory or a portion of an interrogatory has not been fully answered, or a report or a portion of a report has not been completed, a claim of privilege in compliance with 12 C.F.R. § 1080.8 has been submitted.
4. Credit Acceptance Corporation has reviewed all responsive answers, reports, other documents and tangible things (collectively "Responses"), and has designated as confidential all those Responses, and only those Responses, the disclosure of which would cause substantial harm to the competitive position of Credit Acceptance Corporation, as that term is used for purposes of the Freedom of Information Act.

I certify under penalty of perjury that the foregoing is true and correct. Executed on

_____.

DECLARATION CERTIFYING RECORDS OF
REGULARLY CONDUCTED BUSINESS ACTIVITY
Pursuant to 28 U.S.C. § 1746

I, _____, pursuant to 28 U.S.C. § 1746, declare that:

1. I am employed by _____ as _____
and by reason of my position am authorized and qualified to certify the authenticity of the records produced by Credit Acceptance Corporation and submitted with this Declaration.
2. The documents produced and submitted with this Declaration by Credit Acceptance Corporation are true copies of records of regularly conducted activity that were:
 - a. made at or near the time of the occurrence of the matters set forth, by, or from information transmitted by, a person with knowledge of those matters;
 - b. kept in the course of the regularly conducted business activity; and
 - c. made by the regularly conducted business activity as a regular practice.

I certify under penalty of perjury that the foregoing is true and correct. Executed on _____.

CERTIFICATE OF COMPLIANCE WITH RFPA

The Right to Financial Privacy Act of 1978 (RFPA) does not apply to the disclosure of financial records or information to the Bureau of Consumer Financial Protection “in the exercise of its authority with respect to a financial institution.” 12 U.S.C. § 3413(r). This civil investigative demand is also issued in connection with an investigation within the meaning of section 3413(h)(1)(A) of the RFPA. Therefore, in accordance with section 3403(b) of the RFPA, the undersigned certifies that, to the extent applicable, the provisions of the RFPA have been complied with as to the Civil Investigative Demand issued to Credit Acceptance Corporation, to which this Certificate is attached.

The information obtained will be used to determine whether the persons named or referred to in the attached Civil Investigative Demand are in compliance with laws administered by the Bureau of Consumer Financial Protection. The information may be transferred to another department or agency consistent with the RFPA.

Under the RFPA, good faith reliance on this certificate relieves the recipient and its employees and agents of any liability to customers in connection with the requested disclosures of financial records of these customers. *See* 12 U.S.C. § 3417(c).

**John
Wells**

Digitally signed by
John Wells
Date: 2019.04.22
09:53:59 -04'00'

John Wells
Bureau of Consumer Financial Protection
Deputy Director, Office of Enforcement

Civil Investigative Demand Document Submission Standards

BCFP Office of Enforcement



CID Document Submission Standards

This describes the technical requirements for producing electronic document collections to the Bureau of Consumer Financial Protection (“the Bureau”)’s Office of Enforcement. All documents shall be produced in complete form, in color when necessary to interpret the document, unredacted unless privileged, and shall not be edited, cut, or expunged. These standards must be followed for all documents you submit in response to the CID. Any proposed file formats other than those described below must be discussed with the legal and technical staff of the Bureau’s Office of Enforcement prior to submission.

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A. Transmittal Instructions

- 1) A cover letter should be included with each production. The following information should be included in the letter:
 - a) Name of the party making the production and the date of the CID to which the submission is responsive.
 - b) List of each piece of media (hard drive, thumb drive, DVD or CD) included in the production (refer to the media by the unique number assigned to it, see ¶ 4)
 - c) List of custodians, identifying:
 - i) The Bates Range (and any gaps therein) for each custodian,
 - ii) Total number of images for each custodian, and
 - iii) Total number of native files for each custodian
 - d) List of fields in the order in which they are listed in the metadata load file.
 - e) The specification(s) or portions thereof of the CID to which the submission is responsive.
- 2) Documents created or stored electronically MUST be produced in their original electronic format, not converted to another format such as PDF.
- 3) Data may be produced on CD, DVD, USB thumb drive, or hard drive; use the media requiring the least number of deliverables.
 - a) Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:
 - i) "MAGNETIC MEDIA – DO NOT USE METAL DETECTOR"
 - ii) "MAY BE OPENED FOR POSTAL INSPECTION"
 - b) CD-R CD-ROMs should be formatted to ISO 9660 specifications;
 - c) DVD-ROMs for Windows-compatible personal computers are acceptable;
 - d) USB 2.0 thumb drives for Windows-compatible personal computers are acceptable;
 - e) USB 3.0 or USB 3.0/eSATA external hard disk drives, formatted in a Microsoft Windows-compatible file system (FAT32 or NTFS), uncompressed data are acceptable.
- 4) Label all media with the following:
 - a) Production date
 - b) Bates range
 - c) Disk number (1 of X), if applicable
 - d) Name of producing party
 - e) A unique production number identifying each production
- 5) All productions must be produced free of computer viruses. Infected productions may affect the timing of your compliance with the CID.

- 6) All produced media must be encrypted. Encryption format must be agreed upon prior to production.
 - a) Data deliveries should be encrypted at the disc level.
 - b) Decryption keys should be provided separately from the data delivery via email or phone.
- 7) Passwords for documents, files, and compressed archives should be provided separately either via email or in a separate cover letter from the data.

B. Delivery Formats

1) General ESI Standards

Before submitting any Electronically Stored Information (“ESI”) or any other documents submitted in electronic form that do not conform completely to the listed specifications, you must confirm with the Bureau that the proposed formats and media types that contain such ESI will be acceptable. You are encouraged to discuss your specific form of submission, and any related questions with the Bureau as soon as is practicable and not later than the Meet and Confer required pursuant to 12 C.F.R. § 1080.6(c).

All productions must follow the specifications outlined below:

De-duplication

De-duplication of documents should be applied across custodians (global); each custodian should be identified in the Custodian field in the metadata load file separated by semi-colon. The first name in the Custodian list should represent the original holder of the document.

Bates Numbering Documents

The Bates number must be a unique, sequential, consistently formatted identifier, i.e., an alpha prefix unique to each producing party along with a fixed length number, i.e., ABC0000001. This format must remain consistent across all productions. There should be no space in between the prefix and the number. The number of digits in the numeric portion of the format should not change in subsequent productions, nor should hyphens or other separators be added or deleted.

Document Retention / Preservation of Metadata

The recipient of this CID should use reasonable measures to maintain the original native source documents in a manner so as to preserve the metadata associated with these

electronic materials as it existed at the time of the original creation.

2) Native and Image Production

In general, and subject to the specific instructions below: (1) produce electronic documents in their complete native/original format along with corresponding bates-labeled single page TIFF images (with the exception of large spreadsheets and/or text files, those files should be processed and a placeholder TIFF image indicating that they were produced natively provided); (2) scan and process all paper documents into single page TIFF images, OCR the images, and apply bates numbers to each page of the image; (3) produce fully searchable document level text for every produced document; and (4) produce metadata for every produced document in a data file that conforms to the specific instructions below.

a) Metadata File

All produced documents, regardless of their original file format, must be produced with the below-described metadata fields in a data file (.DAT).

- i) The first line of the .DAT file must be a header row identifying the field names.
- ii) The .DAT file must use the following default delimiters:

TABLE 1: DAT FILE DELIMITERS

Comma	,	ASCII character (020)
Quote	"	ASCII character (254)
Newline	␣	ASCII character (174)

- iii) Date fields should be provided in the format: mm/dd/yyyy
- iv) All attachments should sequentially follow the parent document/email.
- v) All documents shall be produced in both their native/original form and as a corresponding bates-labeled single page TIFF image; provide the link to the original/native document in the NATIVELINK field.
- vi) Produce extracted metadata for each document in the form of a .DAT file, and include these fields (fields should be listed but left blank if not applicable):

TABLE 2: DAT FILE FIELDS

Field Name	Description
Required Fields	
BATES_BEGIN	First Bates number of native file document/email
BATES_END	Last Bates number of native file document/email **The BATES_END field should be populated for single page documents/emails
ATTACH_BEGIN	First Bates number of attachment/family range
ATTACH_END	Last Bates number of attachment/family range
ATTACH_NAME	Populates parent records with original filenames of all attached records, separated by semi-colons.
PRIV	Indicate "YES" if document has a Privilege claim
ROG_NUM	Indicate Interrogatory number(s) document is responsive to. (ROG ##) If multiple, separate by semi-colon
DR_NUM	Indicate Document Request document is responsive to. (DR ##) If multiple, separate by semi-colon
RECORDTYPE	<u>Email</u> : Populate field as "E-Mail" <u>Email Attachment</u> : Populate field as "Attachment (E-mail)" <u>Loose Native</u> : Populate field as "E-Document" <u>Other Attachment</u> : Populate field as "Attachment" <u>Scanned Paper</u> : Populate field as "Paper"
CUSTODIAN	Individual(s) or department(s) from which the record originated **semi-colon should be used to separate multiple entries
FILENAME	Email: Filename of loose email or subject of non-loose email Non-email: original file name
PGCOUNT	Number of pages in document/email
MD5HASH	The 32 digit value representing each unique document
SOURCE	Email: Path to email container and email container name Non-email: Original path to source archive folder or files
FOLDERPATH	Email: Folder path within email container Non-email: Folder path to file
DATE_CREATED	The date the electronic file was created
TIME_CREATED	The time the electronic file was created
DATE_MOD	Date an electronic file was last modified
TIME_MOD	Time an electronic file was last modified
PRINT_DATE	Date the document was last printed
PRINT_TIME	Time the document was last printed

FILE_SIZE	Size of native file document/email in KB
FILE_EXT	The file extension representing the email or native file document
AUTHOR	Email: (empty) Non-email: Author of the document
SUBJECT	Subject metadata from electronic files (non-email)
COMPANY	Company (organization) metadata from electronic files
NATIVELINK	Hyperlink to the email or native file document **The linked file must be named per the BATES_BEGIN Number
TEXTPATH	Contains path to OCR/Extracted text file that is titled after the document BATES_BEGIN
Additional Fields for Email Productions	
FROM	Sender of email
TO	Recipient(s) of email **semi-colon should be used to separate multiple entries
CC	Carbon copy recipient(s) **semi-colon should be used to separate multiple entries
BCC	Blind carbon copy recipient(s) **semi-colon should be used to separate multiple entries
EMAIL_SUBJECT	“Subject” line of the email
DATE_SENT	Date and time that the email message was sent.
DATE_RECVD	Date and time that the email message was received.
TIME_ZONE	Time Zone processed in
CONVERSATION_INDEX	Conversation thread ID/Index value
PARENT_ID	Populated only for email attachments, this field will display the Image Tag field value of the attachment record’s parent.

b) Document Text

Searchable text of the entire document must be provided for every record, at the document level.

- i) Extracted text must be provided for all documents that originated in electronic format.

Note: Any document in which text cannot be extracted must be OCR’d.

- ii) For documents redacted on the basis of any privilege, provide the OCR text for unredacted/unprivileged portions.

- iii) The text should be delivered in the following method: As multi-page ASCII text files with the files named the same as the Bates_Begin field. Text files can be placed in a separate folder or included with the .TIFF files.
- c) Linked Native Files

Copies of original email and native file documents/attachments must be included for all electronic productions.

 - i) Native file documents must be named per the BATES_BEGIN number (the original file name should be preserved and produced in the FILENAME metadata field).
 - ii) The full path of the native file must be provided in the .DAT file in the NATIVELINK field.
- d) Images
 - i) Images should be single-page, Group IV TIFF files, scanned at 300 dpi.
 - ii) File names should be titled per endorsed bates number.
 - iii) Color should be preserved when necessary to interpret the document.
 - iv) Bates numbers should be endorsed on the lower right corner of all images.
 - v) For documents partially redacted on the basis of any privilege, ensure the redaction box is clearly labeled "REDACTED".
- e) Image Cross Reference File
 - i) The image cross-reference file is needed to link the images to the database. It is a comma-delimited file consisting of seven fields per line. There must be a line in the cross-reference file for every image in the database.

TABLE 3: IMAGE CROSS REFERENCE FILE FIELDS

Field Title	Description
ImageID	The unique designation use to identify an image.
	Note: This imageID key must be a unique and fixed length number. This number will be used in the .DAT file as the ImageID field that links the database to the images. The format of this image key must be consistent across all productions. We recommend that the format be an eight digit number to allow for the possible increase in the size of a production.
VolumeLabel	Optional
ImageFilePath	The full path to the image file.
DocumentBreak	The letter "Y" denotes the first page of a document. If this field is blank, then the page is not the first page of a document.
FolderBreak	Leave empty
BoxBreak	Leave empty
PageCount	Optional

	<i>*This file should not contain a header row.</i>
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SAMPLE:

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IMG0000001,OPTIONALVOLUMENAME,E:\001\IMG0000001.TIF,Y,,,3
IMG0000002,OPTIONALVOLUMENAME,E:\001\IMG0000002.TIF,,,,
IMG0000003,OPTIONALVOLUMENAME,E:\001\IMG0000003.TIF,,,,
IMG0000004,OPTIONALVOLUMENAME,E:\001\IMG0000004.TIF,Y,,,1
IMG0000005,OPTIONALVOLUMENAME,E:\001\IMG0000005.TIF,Y,,,2
IMG0000006,OPTIONALVOLUMENAME,E:\001\IMG0000006.TIF,,,,

```

3) PDF File Production

When approved, Adobe PDF files may be produced in lieu of TIFF images for scanned paper productions (metadata must also be produced in accordance with the instructions above):

- a) PDF files should be produced in separate folders named by the Custodian.
- b) All PDFs must be unitized at the document level, i.e. each PDF should represent a discrete document; a single PDF cannot contain multiple documents.
- c) All attachments should sequentially follow the parent document.
- d) All PDF files must contain embedded text that includes all discernible words within the document, not selected text only. This requires all layers of the PDF to be flattened first.
- e) If PDF files are Bates endorsed, the PDF files must be named by the Bates range
- f) The metadata load file listed in 2.a. should be included.

4) Transactional Data

If transactional data must be produced, further discussion must be had to ensure the intended export is properly composed. If available, a data dictionary should accompany the production, if unavailable; a description of fields should accompany transactional data productions. The following formats are acceptable:

- MS Access
- XML
- CSV
- TSV
- Excel (with prior approval)

5) Audio/Video/Electronic Phone Records

- a) Audio files must be produced in a format that is playable using Microsoft Windows Media Player. Types of audio files that will be accepted include:
 - Nice Systems audio files (.aud). AUD files offer efficient compression and would be

preferred over both NMF and WAV files.

- Nice Systems audio files (.nmf).
- WAV Files
- MP3, MP4
- WMA
- AIF

Produced audio files must be in a separate folder compared to other data in the production.

Additionally, the call information (metadata) related to each audio recording must be produced if it exists. The metadata file must be produced in delimited text format (DAT, CSV, or TXT), using a tab or pipe delimiter. Field names must be included in the first row of the metadata file. Please note that the field names are case sensitive and should be created as listed below. The metadata must include, if available, the following fields:

TABLE 4: AUDIO METADATA FIELDS

AgentName	Name of agent/employee
AgentId	Unique identifier of agent/employee
Group	Name for a collection of agents
Supervisor	Name of the Agent's supervisor
Site	Location of call facility
DNIS	Dialed Number Identification Service, identifies the number that was originally called
Extension	Extension where call was routed
CallDirection	Identifies whether the call was inbound, outbound, or internal
CallType	Purpose of the call
DURATION	Duration of call
CustomerId	Customer's identification number
CustomerCity	Customer's city of residence
CustomerState	Customer's state of residence
CallDateTime	Date and start time of call (MM/DD/YYYY HH:MM:SS)
CUSTOMERNAME	Name of person called
FileName	Filename of audio file
BATES_BEGIN	Unique number of the audio file

CALLEDPARTYNUMBER	The call center or phone number called
CALLSIZE	File size of audio file
CALLSERVICE	Call service code
MD5HASH	The 32 digit value representing each unique document
DOC_REQ	Document request number to which the file is responsive
CUSTODIAN	Individual(s) or department(s) from which the recording originated
FOLDERPATH	Folder path of the audio file in the original source
SOURCE	Original path to where the source file resided
TIMEZONE	The time zone of the original call
GROUPID	A unique group identifier for grouping multiple calls
CODEC	Encoding/decoding of the audio digital stream
BITRATE	The number of bits that are conveyed or processed per unit of time

Supported Date Format	Example
mm/dd/yyyy hh:mm:ss am/pm	01/25/1996 10:45:15 am

The filename is used to link the metadata to the produced audio file. The file name in the metadata and the file name used to identify the corresponding audio file must match exactly.

- b) Video files must be produced in a format that is playable using Microsoft Windows Media Player along with any available metadata. If it is known that the video files do not contain associated audio, indicate this in the accompanying transmittal letter.

Types of video files accepted include:

- MPG
- AVI
- WMV
- MOV
- FLV

C. Production of Partially Privileged Documents

If a portion of any material called for by this CID is withheld based on a claim of privilege, those portions may be redacted from the responsive material as long as the following conditions are met.

- a) If originally stored as native electronic files, the image(s) of the unredacted portions are submitted in a way that preserves the same appearance as the original without the redacted material (i.e., in a way that depicts the size and location of the redactions). The OCR text will be produced from the redacted image(s). Any redacted, privileged material should be clearly labeled to show the redactions on the tiff image(s). Any metadata not being withheld for privilege should be produced in the DAT file; any content (e.g., PowerPoint speaker notes, Word comments, Excel hidden rows, sheets or columns) contained within the native and not being withheld for privilege should be tiffed and included in the production.
- b) If originally in hard copy form, the unredacted portions are submitted in a way that depicts the size and location of the redactions; for example, if all of the content on a particular page is privileged, a blank, sequentially numbered page should be included in the production where the responsive material, had it not been privileged, would have been located.

BUREAU OF CONSUMER FINANCIAL PROTECTION
Washington, D.C. 20552

Notice to Persons Supplying Information

You have been asked to supply information or speak voluntarily, or directed to provide sworn testimony, documents, or answers to questions in response to a civil investigative demand (CID) from the Bureau of Consumer Financial Protection (Bureau). This notice discusses certain legal rights and responsibilities. Unless stated otherwise, the information below applies whether you are providing information voluntarily or in response to a CID.

A. False Statements; Perjury

False Statements. Section 1001 of Title 18 of the United States Code provides as follows:

[W]hoever, in any matter within the jurisdiction of the executive ... branch of the Government of the United States, knowingly and willfully-- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title ...[or] imprisoned not more than 5 years ..., or both.

Perjury. Section 1621 of Title 18 of the United States Code provides as follows:

Whoever ... having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly or that any written testimony, declaration, deposition, or certificate by him subscribed, is true willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true ... is guilty of perjury and shall, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both. This section is applicable whether the statement or subscription is made within or without the United States.

B. The Fifth Amendment; Your Right to Counsel

Fifth Amendment. Information you provide may be used against you in any federal, state, local or foreign administrative, civil or criminal proceeding brought by the Bureau or any other agency. If you are an individual, you may refuse, in accordance with the rights guaranteed to you by the Fifth Amendment to the Constitution of the United States, to give any information that may tend to incriminate you or subject you to criminal liability, including fine, penalty or forfeiture.

Counsel. You have the right to be accompanied, represented and advised by counsel of your choice. For further information, you should consult Bureau regulations at 12 C.F.R. § 1080.9(b).

C. Effect of Not Supplying Information

Persons Directed to Supply Information Pursuant to CID. If you fail to comply with the CID, the Bureau may seek a court order requiring you to do so. If such an order is obtained and you still fail to supply the information, you may be subject to civil and criminal sanctions for contempt of court.

Persons Requested to Supply Information Voluntarily. There are no sanctions for failing to provide all or any part of the requested information. If you do not provide the requested information, the Bureau may choose to send you a CID or subpoena.

D. Privacy Act Statement

The information you provide will assist the Bureau in its determinations regarding violations of Federal consumer financial laws. The information will be used by and disclosed to Bureau personnel and contractors or other agents who need the information to assist in activities related to enforcement of Federal consumer financial laws. The information may also be disclosed for statutory or regulatory purposes, or pursuant to the Bureau's published Privacy Act system of records notice, to:

- a court, magistrate, administrative tribunal, or a party in litigation;
- another federal or state agency or regulatory authority;
- a member of Congress; and
- others as authorized by the Bureau to receive this information.

This collection of information is authorized by 12 U.S.C. §§ 5511, 5562.

§ 1081.405 Decision of the Director.

(a) Upon appeal from or upon further review of a recommended decision, the Director will consider such parts of the record as are cited or as may be necessary to resolve the issues presented and, in addition, will, to the extent necessary or desirable, exercise all powers which he or she could have exercised if he or she had made the recommended decision. In proceedings before the Director, the record shall consist of all items part of the record below in accordance with § 1081.306; any notices of appeal or order directing review; all briefs, motions, submissions, and other papers filed on appeal or review; and the transcript of any oral argument held. Review by the Director of a recommended decision may be limited to the issues specified in the notice(s) of appeal or the issues, if any, specified in the order directing further briefing. On notice to all parties, however, the Director may, at any time prior to issuance of his or her decision, raise and determine any other matters that he or she deems material, with opportunity for oral or written argument thereon by the parties.

(b) Decisional employees may advise and assist the Director in the consideration and disposition of the case.

(c) In rendering his or her decision, the Director will affirm, adopt, reverse, modify, set aside, or remand for further proceedings the recommended decision and will include in the decision a statement of the reasons or basis for his or her actions and the findings of fact upon which the decision is predicated.

(d) At the expiration of the time permitted for the filing of reply briefs with the Director, the Office of Administrative Adjudication will notify the parties that the case has been submitted for final Bureau decision. The Director will issue and the Office of Administrative Adjudication will serve the Director's final decision and order within 90 days after such notice, unless within that time the Director orders that the adjudication proceeding or any aspect thereof be remanded to the hearing officer for further proceedings.

(e) Copies of the final decision and order of the Director shall be served upon each party to the proceeding, upon other persons required by statute, and, if directed by the Director or required by statute, upon any appropriate State or Federal supervisory authority. The final decision and order will also be published on the Bureau's Web site or as otherwise deemed appropriate by the Bureau.

§ 1081.406 Reconsideration.

Within 14 days after service of the Director's final decision and order, any party may file with the Director a petition for reconsideration, briefly and specifically setting forth the relief desired and the grounds in support thereof. Any petition filed under this section must be confined to new questions raised by the final decision or final order and upon which the petitioner had no opportunity to argue, in writing or orally, before the Director. No response to a petition for reconsideration shall be filed unless requested by the Director, who will request such response before granting any petition for reconsideration. The filing of a petition for reconsideration shall not operate to stay the effective date of the final decision or order or to toll the running of any statutory period affecting such decision or order unless specifically so ordered by the Director.

§ 1081.407 Effective date; stays pending judicial review.

(a) Other than consent orders, which shall become effective at the time specified therein, an order to cease and desist or for other affirmative action under section 1053(b) of the Dodd-Frank Act becomes effective at the expiration of 30 days after the date of service pursuant to § 1081.113(d)(2), unless the Director agrees to stay the effectiveness of the order pursuant to this section.

(b) Any party subject to a final decision and order, other than a consent order, may apply to the Director for a stay of all or part of that order pending judicial review.

(c) A motion for stay shall state the reasons a stay is warranted and the facts relied upon, and shall include supporting affidavits or other sworn statements, and a copy of the relevant portions of the record. The motion shall address the likelihood of the movant's success on appeal, whether the movant will suffer irreparable harm if a stay is not granted, the degree of injury to other parties if a stay is granted, and why the stay is in the public interest.

(d) A motion for stay shall be filed within 30 days of service of the order on the party. Any party opposing the motion may file a response within five days after receipt of the motion. The movant may file a reply brief, limited to new matters raised by the response, within three days after receipt of the response.

(e) The commencement of proceedings for judicial review of a final decision and order of the Director does not, unless specifically ordered by the Director or a reviewing court, operate as a stay of any order issued by the

Director. The Director may, in his or her discretion, and on such terms as he or she finds just, stay the effectiveness of all or any part of an order pending a final decision on a petition for judicial review of that order.

Dated: June 4, 2012.

Richard Cordray,
 Director, Bureau of Consumer Financial
 Protection.

[FR Doc. 2012-14061 Filed 6-28-12; 8:45 am]

BILLING CODE 4810-AM-P

BUREAU OF CONSUMER FINANCIAL PROTECTION

12 CFR Part 1080

[Docket No.: CFPB-2011-0007]

RIN 3170-AA03

Rules Relating to Investigations

AGENCY: Bureau of Consumer Financial Protection.

ACTION: Final rule.

SUMMARY: After considering the public comments on its interim final rule for the Rules Relating to Investigations, the Bureau of Consumer Financial Protection (Bureau), pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act), is making revisions to its procedures for investigations under section 1052 of the Dodd-Frank Act.

DATES: The final rule is effective June 29, 2012.

FOR FURTHER INFORMATION CONTACT: Peter G. Wilson, Office of the General Counsel, Consumer Financial Protection Bureau, 1700 G Street NW., Washington, DC 20552, (202) 435-7585.

SUPPLEMENTARY INFORMATION:

I. Background

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) was signed into law on July 21, 2010. Title X of the Dodd-Frank Act established the Bureau of Consumer Financial Protection (Bureau) to regulate the offering and provision of consumer financial products or services under the Federal consumer financial laws. The Dodd-Frank Act transferred to the Bureau the consumer financial protection functions formerly carried out by the Federal banking agencies, as well as certain authorities formerly carried out by the Department of Housing and Urban Development (HUD) and the Federal Trade Commission (FTC). As required by section 1062 of the Dodd-Frank Act, 12 U.S.C. 5582, the Secretary of the Treasury selected a

designated transfer date and the Federal banking agencies' functions and authorities transferred to the Bureau on July 21, 2011.

The Dodd-Frank Act authorizes the Bureau to conduct investigations to ascertain whether any person is or has been engaged in conduct that, if proved, would constitute a violation of any provision of Federal consumer financial law. Section 1052 of the Dodd-Frank Act sets forth the parameters that govern these investigations. 12 U.S.C. 5562. Section 1052 became effective immediately upon transfer on July 21, 2011 and did not require rules to implement its provisions. On July 28, 2011, the Bureau issued the interim final rule for the Rules Relating to Investigations (Interim Final Rule) to provide parties involved in Bureau investigations with clarification on how to comply with the statutory requirements relating to Bureau investigations.

II. Summary of the Final Rule

Consistent with section 1052 of the Dodd-Frank Act, the final rule for the Rules Relating to Investigations (Final Rule) describes a number of Bureau policies and procedures that apply in an investigational, nonadjudicative setting. Among other things, the Final Rule sets forth (1) the Bureau's authority to conduct investigations, and (2) the rights of persons from whom the Bureau seeks to compel information in investigations.

Like the Interim Final Rule, the Final Rule is modeled on investigative procedures of other law enforcement agencies. For guidance, the Bureau reviewed the procedures currently used by the FTC, the Securities and Exchange Commission (SEC), and the prudential regulators, as well as the FTC's recently proposed amendments to its nonadjudicative procedures. In light of the similarities between section 1052 of the Dodd-Frank Act and section 20 of the Federal Trade Commission Act (FTC Act), 15 U.S.C. 41 *et seq.*, the Bureau drew most heavily from the FTC's nonadjudicative procedures in constructing the rules.

The Final Rule lays out the Bureau's authority to conduct investigations before instituting judicial or administrative adjudicatory proceedings under Federal consumer financial law. The Final Rule authorizes the Director, the Assistant Director of the Office of Enforcement, and the Deputy Assistant Directors of the Office of Enforcement to issue civil investigative demands (CIDs) for documentary material, tangible things, written reports, answers to questions, or oral testimony. The

demands may be enforced in district court by the Director, the General Counsel, or the Assistant Director of the Office of Enforcement. The Final Rule also details the authority of the Bureau's investigators to conduct investigations and hold investigational hearings pursuant to civil investigative demands for oral testimony.

Furthermore, the Final Rule sets forth the rights of persons from whom the Bureau seeks to compel information in an investigation. Specifically, the Final Rule describes how such persons should be notified of the purpose of the Bureau's investigation. It also details the procedures for filing a petition for an order modifying or setting aside a CID, which the Director is authorized to rule upon. And it describes the process by which persons may obtain copies of or access to documents or testimony they have provided in response to a civil investigative demand. In addition, the Final Rule describes a person's right to counsel at investigational hearings.

III. Legal Authority

As noted above, section 1052 of the Dodd-Frank Act outlines how the Bureau will conduct investigations and describes the rights of persons from whom the Bureau seeks information in investigations. This section became effective immediately upon the designated transfer date, July 21, 2011, without any requirement that the Bureau first issue procedural rules. Nevertheless, the Bureau believes that the legislative purpose of section 1052 will be furthered by the issuance of rules that specify the manner in which persons can comply with its provisions.

Section 1022 of the Dodd-Frank Act authorizes the Director to prescribe rules as may be necessary or appropriate for the Bureau to administer and carry out the purposes and objectives of Federal consumer financial laws and to prevent evasion of those laws. 12 U.S.C. 5512. The Bureau believes that the Final Rule will effectuate the purpose of section 1052 and facilitate compliance with Bureau investigations.

IV. Overview of Public Comments on the Interim Final Rule

After publication of the Interim Final Rule on July 28, 2011, the Bureau accepted public comments until September 26, 2011. During the comment period, the Bureau received seven comments. Two of the comments were submitted by individual consumers. Four trade associations and a mortgage company also submitted comments. The trade associations represent credit unions, banks, consumer credit companies, members of

the real estate finance industry, and other financial institutions.

The commenters generally support the Interim Final Rule. Most sections of the Interim Final Rule received no comment and are being finalized without change. The comments did, however, contain questions and recommendations for the Bureau.

Several of the commenters expressed concern that the Interim Final Rule appeared to provide staff-level Bureau employees with unchecked authority to initiate investigations and issue CIDs, or that the Interim Final Rule otherwise did not provide sufficient oversight for particular actions.

A number of commenters expressed concern about sections of the Interim Final Rule that relate to CIDs. One trade association recommended that a statement of "the purpose and scope" of a Bureau investigation—in addition to a notification of the nature of the conduct constituting the alleged violation under investigation and the applicable provisions of law—be included in CIDs. A commenter suggested that the Bureau require a conference between CID recipients and the Assistant Director of the Office of Enforcement to negotiate the terms of compliance with the demand. Three of the trade associations noted concern with the statement that extensions of time are disfavored for petitions to modify or set aside CIDs. Two commenters questioned who would rule on such petitions without a confirmed Director. One trade association commented that witnesses should be permitted to object to questions demanding information outside of the scope of the investigation during an investigational hearing pursuant to a CID for oral testimony.

A number of commenters expressed concern about maintaining the confidentiality of demand material, sharing information with other State and Federal agencies, and the duties of the custodians of those materials. For example, one trade association and the mortgage company recommended that investigations should remain confidential in all circumstances. Another trade association asserted that the Bureau is not permitted to engage in joint investigations with State attorneys general.

The Bureau reviewed all of the comments on its Interim Final Rule thoroughly and addresses the significant issues they raise herein. Although most sections of the Interim Final Rule received no comment and are being finalized without change, the Bureau has made several changes to the Interim Final Rule based on the comments it received. The comments and these

changes are discussed in more detail in parts V and VI of the **SUPPLEMENTARY INFORMATION**.

V. General Comments

Some comments on the Interim Final Rule were not directed at a specific section but rather concerned issues of general applicability. The Bureau addresses those comments in this section and addresses comments related to specific sections of the Interim Final Rule in part VI.

One commenter asked the Bureau to specify who would rule on petitions to set aside or modify CIDs while the Bureau lacked a Director. This commenter also asked who would review requests to the Attorney General under § 1080.12 for authority to immunize witnesses and to order them to testify or provide other information. The President appointed a Director of the Bureau on January 4, 2012. Therefore, both questions posed by this commenter are moot. The Director or any official to whom the Director has delegated his authority pursuant to 12 U.S.C. 5492(b) will rule on petitions to set aside or modify CIDs. Furthermore, the Bureau has revised § 1080.12 to clarify that only the Director has the authority to request approval from the Attorney General for the issuance of an order immunizing witnesses.

A commenter asserted that section 1052(c)(1) of the Dodd-Frank Act prohibits the Bureau from issuing CIDs after the institution of any proceedings under Federal consumer financial laws, including proceedings initiated by a State or a private party. The commenter argued that a CID should be accompanied by a certification that the demand will have no bearing on any ongoing proceeding. Section 1052(c)(1) provides, in relevant part, that “the Bureau may, before the institution of any proceedings under the Federal consumer financial law, issue in writing, and cause to be served upon such person, a civil investigative demand.” The language “before the institution of any proceeding under Federal consumer financial law” refers to the institution of proceedings by the Bureau. It does not limit the Bureau’s authority to issue CIDs based upon the commencement of a proceeding by other parties.

Another commenter requested that the Bureau exempt all credit unions from Bureau investigations. The Bureau believes that granting an exemption from the Bureau’s enforcement authority through the Final Rule would be inappropriate and that there is an insufficient record to support such an exemption.

A commenter recommended that covered persons be allowed to recover attorneys’ fees and costs incurred by defending against an investigation that is shown to be without merit. The Dodd-Frank Act does not provide the right to recover fees and costs by defending against an investigation. Further, as explained below, the Bureau believes that the procedures for petitioning to modify or set aside a CID set forth in § 1080.6(d) of the Interim Final Rule (now 1080.6(e) of the Final Rule) provide sufficient protections to a recipient of a demand it believes lacks merit.

VI. Section-by-Section Summary

Section 1080.1 Scope

This section describes the scope of the Interim Final Rule. It makes clear that these rules only apply to investigations under section 1052 of the Dodd-Frank Act. The Bureau received no comment on § 1080.1 of the Interim Final Rule and is adopting it as the Final Rule without change.

Section 1080.2 Definitions

This section of the Interim Final Rule defines several terms used throughout the rules. Many of these definitions also may be found in section 1051 of the Dodd-Frank Act.

A commenter questioned the breadth of the definition of the term “Assistant Director of the Division of Enforcement.” The commenter argued that because that term was defined to include “any Bureau employee to whom the Assistant Director of the Division of Enforcement has delegated authority to act under this part,” the Interim Final Rule could give Bureau employees inappropriately broad authority to take certain actions, such as issuing CIDs.

The Bureau has revised the Final Rule in response to these comments. The Final Rule identifies those with authority to take particular actions under each section of the Final Rule. Sections 1080.4 (initiating and conducting investigations) and 1080.6 (civil investigative demands) of the Final Rule clarify that the authority to initiate investigations and issue CIDs cannot be delegated by the identified officials. The Final Rule also changes the defined term “Division of Enforcement” to “Office of Enforcement” to reflect the Bureau’s current organizational structure.

Section 1080.3 Policy as to Private Controversies

This section of the Interim Final Rule states the Bureau’s policy of pursuing investigations that are in the public

interest. Section 1080.3 is consistent with the Bureau’s mission to protect consumers by investigating potential violations of Federal consumer financial law. The Bureau received no comments on § 1080.3 of the Interim Final Rule and is adopting it as the Final Rule without change.

Section 1080.4 Initiating and Conducting Investigations

This section of the Interim Final Rule explains that Bureau investigators are authorized to conduct investigations pursuant to section 1052 of the Dodd-Frank Act.

A commenter observed that this section of the Interim Final Rule did not explicitly provide a procedure for senior agency officials to authorize the opening of an investigation. The commenter argued that only senior agency officials should decide whether to initiate investigations. The commenter questioned whether staff-level employees could open investigations and issue CIDs without sufficient supervision, and noted that the FTC’s analogous rule specifically lists the senior officials to whom the Commission has delegated, without power of redelegation, the authority to initiate investigations.

A commenter also expressed concern that the FTC’s analogous rule explicitly provides that FTC investigators must comply with the laws of the United States and FTC regulations. According to the commenter, such language is necessary to ensure that the Bureau complies with the Right to Financial Privacy Act (RFPA) to the extent that statute applies to the Bureau. The commenter also believes that this language is needed to guard against investigations undertaken for what the commenter characterized as the impermissible purpose of aiding State attorneys general or State regulators. The commenter suggested that the Bureau add a statement to this section of the Interim Final Rule similar to the FTC’s rule requiring compliance with Federal law and agency regulations.

The Final Rule clarifies that only the Assistant Director or any Deputy Assistant Director of the Office of Enforcement has the authority to initiate investigations. The Bureau has significant discretion to determine whether and when to open an investigation, and the public benefits from a process whereby the Bureau can open and close investigations efficiently. But the Bureau did not intend its rules to be interpreted so broadly as to suggest that any staff-level employee could unilaterally open an investigation or issue a CID. The Final

Rule also provides that Bureau investigators will perform their duties in accordance with Federal law and Bureau regulations.

Section 1080.5 Notification of Purpose

This section of the Interim Final Rule specifies that a person compelled to provide information to the Bureau or to testify in an investigational hearing must be advised of the nature of the conduct constituting the alleged violation under investigation and the applicable provisions of law. This section of the Interim Final Rule implements the requirements for CIDs described in section 1052(c)(2) of the Dodd-Frank Act.

Commenters noted that although the Dodd-Frank Act and the FTC Act both require CIDs to state “the nature of the conduct constituting the alleged violation which is under investigation and the provision of law applicable to such violation,” the two agencies’ implementing regulations on this topic differ. Both agencies’ regulations require a statement of the nature of the conduct at issue and the relevant provisions of law, but the FTC rule also requires that the recipient of the CID be advised of “the purpose and scope” of the investigation. Commenters argued that the Bureau should add this phrase to its rule because excluding it would lead to requests for materials outside the scope of an investigation. One commenter argued that only senior agency officials should authorize investigations to ensure that CIDs are relevant to the purpose and scope of the Bureau’s investigations.

The language in § 1080.5 of the Interim Final Rule mirrors the language of the Dodd-Frank Act, which provides that “[e]ach civil investigative demand shall state the nature of the conduct constituting the alleged violation which is under investigation and the provision of law applicable to such violation.” The Bureau believes that the information covered by this statutory language provides sufficient notice to recipients of CIDs. As discussed above, § 1080.4 (initiating and conducting investigations) of the Final Rule limits the authority to open investigations to the Assistant Director or any Deputy Assistant Director of the Office of Enforcement. Similarly, § 1080.6 of the Final Rule (civil investigative demands) limits the authority to issue CIDs to the Director of the Bureau, the Assistant Director of the Office of Enforcement, and the Deputy Assistant Directors of the Office of Enforcement. Thus, one of these identified officials will review and approve the initiation of all investigations and the issuance of all

CIDs. In addition, to the extent recipients of CIDs consider the demands to be for an unauthorized purpose or outside the scope of the investigation, they will have an opportunity to negotiate the terms of compliance pursuant to § 1080.6(c) of the Interim Final Rule (now § 1080.6(d) of the Final Rule) or to petition to set aside or modify the demand pursuant to § 1080.6(d) of the Interim Final Rule (now § 1080.6(e) of the Final Rule).

The Bureau therefore adopts this section of the Interim Final Rule as the Final Rule without change.

Section 1080.6 Civil Investigative Demands

This section of the Interim Final Rule lays out the Bureau’s procedures for issuing CIDs. It authorizes the Assistant Director of the Office of Enforcement to issue CIDs for documentary material, tangible things, written reports, answers to questions, and oral testimony. This section of the Interim Final Rule details the information that must be included in CIDs and the requirement that responses be made under a sworn certificate. Section 1080.6 of the Interim Final Rule also authorizes the Assistant Director of the Office of Enforcement to negotiate and approve the terms of compliance with CIDs and grant extensions for good cause. Finally, this section of the Interim Final Rule describes the procedures for seeking an order to modify or set aside a CID, which the Director is authorized to rule upon.

One commenter argued that § 1080.6(a) permits almost any Bureau employee to issue CIDs without sufficient supervision. The commenter stated that this lack of oversight is problematic and does not reflect Congress’ intent when it enacted the Act.

Section 1080.6(a) of the Final Rule limits the authority to issue CIDs to the Director, the Assistant Director of the Office of Enforcement, and the Deputy Assistant Directors of the Office of Enforcement. This change to the Final Rule balances the efficiency of the Bureau’s investigative process with appropriate supervision and oversight.

A commenter suggested that the Bureau require a conference between the CID recipient and the Assistant Director of the Office of Enforcement within ten days of service of the CID to negotiate and approve the terms of compliance. The commenter envisioned a conference analogous to a discovery planning conference under the Federal Rules of Civil Procedure, during which the parties could discuss requests for information, appropriate limitations on

the scope of requests, issues related to electronically stored information (ESI), issues related to privilege and confidential information, and a reasonable time for compliance. The commenter stated that this type of conference would better ensure prompt and efficient production of material and information related to the investigation.

The Bureau agrees that a conference between the parties within ten calendar days of serving a CID is likely to improve the efficiency of investigations, and § 1080.6(c) of the Final Rule provides for such a conference. The Final Rule does not, however, adopt the suggestion that the Assistant Director of the Office of Enforcement preside over all such conferences.

Several commenters also noted concern with the statement in § 1080.6(d) of the Interim Final Rule disfavoring extensions of time for petitioning for an order modifying or setting aside CIDs. One commenter argued that the 20-day period to file petitions, for which extensions of time are disfavored, is inconsistent with the “reasonable” period of time for compliance with the CID set forth in § 1080.6(a). The commenter also argued that this timeframe leaves a short period for the CID recipient to decide which documents are privileged or otherwise protected and to file a petition articulating privilege and scope objections. Another commenter noted that the analogous FTC rules do not include a provision disfavoring extensions for petitions to modify or set aside a CID. These commenters recommended that the Bureau delete the sentence related to disfavoring extensions. One commenter recommended that the rules be corrected to provide an independent review if a covered person believes a CID is without merit.

Like the Interim Final Rule, the Final Rule includes a provision disfavoring extensions of time for petitions to modify or set aside a CID. The Bureau believes its policy of disfavoring extensions is appropriate in light of its significant interest in promoting an efficient process for seeking materials through CIDs. By disfavoring extensions, the Bureau means to prompt recipients to decide within 20 days whether they intend to comply with the CID. The Final Rule also clarifies that this 20-day period should be computed with calendar days.

The Bureau notes that § 1080.6(d) of the Interim Final Rule (now § 1080.6(e) of the Final Rule) only provides the due date for a petition for an order modifying or setting aside a CID. It does not require recipients to comply fully

with CIDs within 20 days. In addition, the Final Rule provides several options to recipients of CIDs that need additional time to respond. For example, the recipient may negotiate for a reasonable extension of time for compliance or a rolling document production schedule pursuant to § 1080.6(c) of the Interim Final Rule (now § 1080.6(d) of the Final Rule).

Section 1080.6(e) of the Final Rule clarifies that recipients of CIDs should not assert claims of privilege through a petition for an order modifying or setting aside a CID. Instead, when privilege is the only basis for withholding particular materials, they should utilize the procedures set forth in § 1080.8 (withholding requested material) of the Final Rule. Section 1080.6(e) of the Final Rule also lays out the authority of Bureau investigators to provide to the Director a reply to a petition seeking an order modifying or setting aside a CID. Specifically, the Final Rule states that Bureau investigators may provide the Director with a statement setting forth any factual and legal responses to a petition. The Bureau will not make these statements or any other internal deliberations part of the Bureau's public records. Section 1080.6(g) of the Final Rule clarifies that the Bureau, however, will make publicly available both the petition and the Director's order in response. Section 1080.6(g) of the Final Rule also clarifies that if a CID recipient wants to prevent the Director from making the petition public, any showing of good cause must be made no later than the time the petition is filed. The Final Rule also adds a provision clarifying how the Bureau will serve the petitioner with the Director's order.

Finally, the Bureau believes the procedures for petitions to modify or set aside a CID set forth in the Final Rule adequately protect a covered person who believes a CID is without merit, and that an additional independent review is unnecessary.

Section 1080.7 Investigational Hearings

This section of the Interim Final Rule describes the procedures for investigational hearings initiated pursuant to a CID for oral testimony. It also lays out the roles and responsibilities of the Bureau investigator conducting the investigational hearing, which include excluding unauthorized persons from the hearing room and ensuring that the investigational hearing is transcribed, the witness is duly sworn, the transcript is a true record of the testimony, and the

transcript is provided to the designated custodian.

A commenter argued that the Bureau is not authorized to conduct joint investigations with State attorneys general under the Dodd-Frank Act and, correspondingly, State attorneys general cannot attend an investigational hearing as a representative of an agency with whom the Bureau is conducting a joint investigation. The commenter argued that Congress distinguished between State attorneys general and State regulatory agencies in section 1042 of the Dodd-Frank Act and that State attorneys general are therefore not "agencies" with whom the Bureau can partner. The commenter also asserted that the Bureau cannot share a copy of the transcript of an investigational hearing with another agency without the consent of the witness.

Another commenter argued that representatives of agencies with which the Bureau is conducting a joint investigation may be present at an investigational hearing only with the witness's consent. This commenter stated that the Bureau should recognize in the rules that a witness who does not consent to the presence of a representative of another agency at an investigational hearing should not be presumed guilty.

The Dodd-Frank Act states that the Bureau "may engage in joint investigations and requests for information, as authorized under this title." This statutory language permits the Bureau to engage in joint investigations with State or Federal law enforcement agencies, including State attorneys general, with jurisdiction that overlaps with the Bureau's. The Bureau's disclosure rules also permit the Bureau to share certain confidential information, including investigational hearing transcripts, with Federal or State agencies to the extent the disclosure is relevant to the exercise of an agency's statutory or regulatory authority. See 12 CFR 1070.43(b). In addition, neither the Dodd-Frank Act nor the rules require the consent of the witness to permit a representative of an agency with which the Bureau is conducting a joint investigation to be present at the hearing. Consent is required only when people other than those listed in the rule are included.

Thus, the Bureau adopts § 1080.7 of the Interim Final Rule as the Final Rule without change.

Section 1080.8 Withholding Requested Material

This section of the Interim Final Rule describes the procedures that apply when persons withhold material

responsive to a CID. It requires the recipient of the CID to assert a privilege by the production date and, if so directed in the CID, also to submit a detailed schedule of the items withheld. Section 1080.8 also sets forth the procedures for handling the disclosure of privileged or protected information or communications.

The Bureau received no comment on § 1080.8 of the Interim Final Rule and is adopting it as the Final Rule without substantive change.

Section 1080.9 Rights of Witnesses in Investigations

This section of the Interim Final Rule describes the rights of persons compelled to submit information or provide testimony in an investigation. It details the procedures for obtaining a copy of submitted documents or a copy of or access to a transcript of the person's testimony. This section of the Interim Final Rule also describes a witness's right to make changes to his or her transcript and the rules for signing the transcript.

Section 1080.9 of the Interim Final Rule lays out a person's right to counsel at an investigational hearing and describes his or her counsel's right to advise the witness as to any question posed for which an objection may properly be made. It also describes the witness's or counsel's rights to object to questions or requests that the witness is privileged to refuse to answer. This section of the Interim Final Rule states that counsel for the witness may not otherwise object to questions or interrupt the examination to make statements on the record but may request that the witness have an opportunity to clarify any of his or her answers. Finally, this section of the Interim Final Rule authorizes the Bureau investigator to take all necessary action during the course of the hearing to avoid delay and to prevent or restrain disorderly, dilatory, obstructionist, or contemptuous conduct, or contemptuous language.

A commenter noted that under the Interim Final Rule witnesses could not object during an investigational hearing on the ground that a question was outside the scope of the investigation. The commenter argued that a covered person's inability to raise such objections might allow "a fishing expedition." The commenter recommended amending § 1080.9(b) to allow objections based on scope.

Section 1052(c)(13)(D)(iii) of the Dodd-Frank Act states, in relevant part:

[a]n objection may properly be made, received, and entered upon the record when it is claimed that such person is entitled to

refuse to answer the question on grounds of any constitutional or other legal right or privilege, including the privilege against self-incrimination, but the person shall not otherwise object to or refuse to answer any question, and such person or attorney shall not otherwise interrupt the oral examination.

Thus, to the extent the scope objection was grounded in a witness's constitutional or other legal right, it would be a proper objection.

The Final Rule clarifies that counsel may confer with a witness while a question is pending or instruct a witness not to answer a question only if an objection based on privilege or work product may properly be made. The Final Rule also describes counsel's limited ability to make additional objections based on other constitutional or legal rights. The Final Rule provides that if an attorney has refused to comply with his or her obligations in the rules of this part, or has allegedly engaged in disorderly, dilatory, obstructionist, or contumacious conduct, or contemptuous language during an investigational hearing, the Bureau may take further action, including action to suspend or disbar the attorney from further participation in the investigation or further practice before the Bureau pursuant to 12 CFR 1081.107(c). The Final Rule also includes other nonsubstantive changes, including clarifying that the 30-day period that the witness has to sign and submit his or her transcript should be computed using calendar days.

Section 1080.10 Noncompliance With Civil Investigative Demands

This section of the Interim Final Rule authorizes the Director, the Assistant Director of the Office of Enforcement, and the General Counsel to initiate an action to enforce a CID in connection with the failure or refusal of a person to comply with, or to obey, a CID. In addition, they are authorized to seek civil contempt or other appropriate relief in cases where a court order enforcing a CID has been violated.

The Bureau received no comment on § 1080.10 of the Interim Final Rule and is adopting it as the Final Rule without substantive change.

Section 1080.11 Disposition

This section of the Interim Final Rule explains that an enforcement action may be instituted in Federal or State court or through administrative proceedings when warranted by the facts disclosed by an investigation. It further provides that the Bureau may refer investigations to appropriate Federal, State, or foreign government agencies as appropriate. This section of the Interim Final Rule

also authorizes the Assistant Director of the Office of Enforcement to close the investigation when the facts of an investigation indicate an enforcement action is not necessary or warranted in the public interest.

One commenter indicated that the Bureau's authority to refer investigations to other law enforcement agencies should be limited to circumstances when it is expressly authorized to do so by the Dodd-Frank Act, an enumerated consumer financial law, or other Federal law, because of potential risks to the confidentiality of the investigatory files.

The Bureau's ability to refer matters to appropriate law enforcement agencies is inherent in the Bureau's authority and is a corollary to the Bureau's statutorily recognized ability to conduct joint investigations. The documentary materials and tangible things obtained by the Bureau pursuant to a CID are subject to the requirements and procedures relating to disclosure of records and information in part 1070 of this title. These procedures for sharing information with law enforcement agencies provide significant and sufficient protections for these materials.

The Bureau has amended § 1080.11 to clarify that the Assistant Director and any Deputy Assistant Director of the Office of Enforcement are authorized to close investigations.

The Bureau adopts § 1080.11 of the Interim Final Rule with the changes discussed above.

Section 1080.12 Orders Requiring Witnesses To Testify or Provide Other Information and Granting Immunity

This section of the Interim Final Rule authorizes the Assistant Director of the Office of Enforcement to request approval from the Attorney General for the issuance of an order requiring a witness to testify or provide other information and granting immunity under 18 U.S.C. 6004. The Interim Final Rule also sets forth the Bureau's right to review the exercise of these functions and states that the Bureau will entertain an appeal from an order requiring a witness to testify or provide other information only upon a showing that a substantial question is involved, the determination of which is essential to serve the interests of justice. Finally, this section of the Interim Final Rule describes the applicable rules and time limits for such appeals.

A commenter questioned whether this section of the Interim Final Rule would permit any Bureau employee to request that the Attorney General approve the issuance of an order granting immunity

under 18 U.S.C. 6004 and requiring a witness to testify or provide information. The commenter noted that the Dodd-Frank Act authorizes the Bureau, with the Attorney General's permission, to compel a witness to testify under 18 U.S.C. 6004 if the witness invokes his or her privilege against self-incrimination. The commenter argued that this section should delegate the authority to seek permission to compel testimony to a specific individual to provide accountability and ensure that information is not disclosed to the Attorney General in a manner that violates the Right to Financial Privacy Act. The commenter noted that the FTC's analogous rule specifically lists the senior agency officials who are authorized to make such requests to the Attorney General, and identifies a liaison officer through whom such requests must be made. The commenter also suggested that § 1080.12(b) of the Interim Final Rule, which provides that the Assistant Director's exercise of this authority is subject to review by "the Bureau," specify who will conduct this review.

The Final Rule provides that only the Director of the Bureau has the authority to request approval from the Attorney General for the issuance of an order requiring a witness to testify or provide other information and granting immunity under 18 U.S.C. 6004. This change addresses the concern that requests for witness immunity would be made without oversight. Limiting this authority to the Director provides sufficient accountability.

Section 1080.13 Custodians

This section of the Interim Final Rule describes the procedures for designating a custodian and deputy custodian for material produced pursuant to a CID in an investigation. It also states that these materials are for the official use of the Bureau, but, upon notice to the custodian, must be made available for examination during regular office hours by the person who produced them.

A commenter suggested that the Bureau should detail the particular duties of custodians designated under this section and that, without an enumerated list of duties, the custodian would not have any responsibilities regarding CID materials. The commenter noted that the FTC Act requires the custodian to take specific actions, while the Dodd-Frank Act does not. The commenter suggested specifying a series of custodial duties, including (1) taking and maintaining custody of all materials submitted pursuant to CIDs or subpoenas that the Bureau issues,

including transcripts of oral testimony taken by the Bureau; (2) maintaining confidentiality of those materials as required by applicable law; (3) providing the materials to either House of Congress upon request, after ten days notice to the party that owns or submitted the materials; (4) producing any materials as required by a court of competent jurisdiction; and (5) complying at all times with the Trade Secrets Act.

Section 1052 of the Dodd-Frank Act sets forth the duties of the Bureau's custodian. Sections 1052(c)(3) through (c)(6) of the Dodd-Frank Act give the custodian responsibility for receiving documentary material, tangible things, written reports, answers to questions, and transcripts of oral testimony given by any person in compliance with any CID. Section 1052(d) of the Dodd-Frank Act, as well as the Bureau's Rules for Disclosure of Records and Information in part 1070 of this title, outline the requirements for the confidential treatment of demand material. Section 1052(g) addresses custodial control and provides that a person may file, in the district court of the United States for the judicial district within which the office of the custodian is situated, a petition for an order of such court requiring the performance by the custodian of any duty imposed upon him by section 1052 of the Dodd-Frank Act or by Bureau rule. These duties and obligations do not require additional clarification by rule.

The Final Rule clarifies that the custodian has the powers and duties of both section 1052 of the Dodd-Frank Act and 12 CFR 1070.3.

The Bureau adopts § 1080.13 of the Interim Final Rule with the changes discussed above.

Section 1080.14 Confidential Treatment of Demand Material and Non-Public Nature of Investigations

Section 1080.14 of the Interim Final Rule explains that documentary materials, written reports, answers to questions, tangible things, or transcripts of oral testimony received by the Bureau in any form or format pursuant to a CID are subject to the requirements and procedures relating to disclosure of records and information in part 1070 of this title. This section of the Interim Final Rule also states that investigations generally are non-public. A Bureau investigator may disclose the existence of an investigation to the extent necessary to advance the investigation.

A commenter recommended that the Bureau revise this section to mandate that Bureau investigations remain confidential. The commenter noted the

potential reputation risk to an entity if an investigation is disclosed to the public. In addition, the commenter argued that failing to conduct investigations confidentially will increase litigation risk. One commenter recommended that the Bureau issue a public absolution of a company if the Bureau does not maintain the confidentiality of an investigation.

Section 1080.14 of the Interim Final Rule provides that investigations generally will not be disclosed to the public, but permits Bureau investigators to disclose the existence of an investigation when necessary to advance the investigation. The Interim Final Rule does not contemplate publicizing an investigation, but rather disclosing the existence of the investigation to, for example, a potential witness or third party with potentially relevant information when doing so is necessary to advance the investigation. This limited exception sufficiently balances the concerns expressed by the commenter with the Bureau's need to obtain information efficiently.

Thus, the Bureau adopts § 1080.14 of the Interim Final Rule as the Final Rule without change.

VII. Section 1022(b)(2) Provisions

In developing the Final Rule, the Bureau has considered the potential benefits, costs, and impacts, and has consulted or offered to consult with the prudential regulators, HUD, the SEC, the Department of Justice, and the FTC, including with regard to consistency with any prudential, market, or systemic objectives administered by such agencies.¹

The Final Rule neither imposes any obligations on consumers nor is expected to have any appreciable impact on their access to consumer financial products or services. Rather, the Final Rule provides a clear, efficient mechanism for investigating compliance with the Federal consumer financial laws, which benefits consumers by creating a systematic process to protect them from unlawful behavior.

¹ Section 1022(b)(2)(A) of the Dodd-Frank Act addresses the consideration of the potential benefits and costs of regulation to consumers and covered persons, including the potential reduction of access by consumers to consumer financial products or services; the impact on depository institutions and credit unions with \$10 billion or less in total assets as described in section 1026 of the Dodd-Frank Act; and the impact on consumers in rural areas. Section 1022(b)(2)(B) addresses consultation between the Bureau and other Federal agencies during the rulemaking process. The manner and extent to which these provisions apply to procedural rules and benefits, costs and impacts that are compelled by statutory changes rather than discretionary Bureau action is unclear. Nevertheless, to inform this rulemaking more fully, the Bureau performed the described analyses and consultations.

The Final Rule imposes certain obligations on covered persons who receive CIDs in Bureau investigations. Specifically, as described above, the Final Rule sets forth the process for complying with or objecting to CIDs for documentary material, tangible things, written reports or answers to questions, and oral testimony. Most obligations in the Final Rule stem from express language in the Dodd-Frank Act and do not impose additional burdens on covered persons.

To the extent that the Final Rule includes provisions not expressly required by statute, these provisions benefit covered persons by providing clarity and certainty. In addition, the Final Rule vests the Bureau with discretion to modify CIDs or extend the time for compliance for good cause. This flexibility benefits covered persons by enabling the Bureau to assess the cost of compliance with a civil investigative demand in a particular circumstance and take appropriate steps to mitigate any unreasonable compliance burden.

Moreover, because the Final Rule is largely based on section 20 of the FTC Act and its corresponding regulations, it should present an existing, stable model of investigatory procedures to covered persons. This likely familiarity to covered persons should further reduce the compliance costs for covered persons.

The Final Rule provides that requests for extensions of time to file petitions to modify or set aside CIDs are disfavored. This may impose a burden on covered entities in some cases, but it may also lead to a more expeditious resolution of matters, reducing uncertainty. Furthermore, the Final Rule has no unique impact on insured depository institutions or insured credit unions with less than \$10 billion in assets as described in section 1026(a) of the Dodd-Frank Act. Nor does the Final Rule have a unique impact on rural consumers.

A commenter suggested that the Bureau conduct a nonpublic study of the impact of complying with a CID on the entities who have been subjected to them by other agencies, with specific focus on those that were found not to have violated the law. As the commenter implicitly recognizes, such data does not currently exist and thus was not reasonably available to the Bureau in finalizing the Interim Final Rule. Moreover, as explained above, most of the costs associated with complying with a CID result from the Dodd-Frank Act, which authorizes the Bureau to issue such demands.

A commenter asserted that disfavoring extensions of petitions to

modify or set aside CIDs will require the recipient to conduct a full review of the demanded material within the normal 20-day period in order to comply with the deadline for filing a petition. Under the Final Rule, recipients of a CID are not required to comply fully within twenty days; rather, they are required simply to decide whether they will comply with the demand at all. The Assistant Director of the Office of Enforcement and the Deputy Assistant Directors of the Office of Enforcement have the discretion to negotiate and approve the terms of satisfactory compliance with CIDs and, for good cause shown, may extend the time prescribed for compliance. Thus, the Final Rule provides reasonable steps to mitigate compliance burden while simultaneously protecting the Bureau's law enforcement interests.

Another commenter stated that the four interim final rules that the Bureau promulgated together on July 28, 2011 failed to satisfy the rulemaking requirements under section 1022 of the Dodd-Frank Act. Specifically, the commenter stated that "the CFPB's analysis of the costs and benefits of its rules does not recognize the significant costs the CFPB imposes on covered persons." The Bureau believes that it appropriately considered the benefits, costs, and impacts of the Interim Final Rule pursuant to section 1022. Notably, the commenter did not identify any specific costs to covered persons that are not discussed in Part C of the SUPPLEMENTARY INFORMATION to the Interim Final Rule.

VIII. Procedural Requirements

As noted in publishing the Interim Final Rule, under the Administrative Procedure Act, 5 U.S.C. 553(b), notice and comment is not required for rules of agency organization, procedure, or practice. As discussed in the preamble to the Interim Final Rule, the Bureau confirms its finding that this is a procedural rule for which notice and comment is not required. In addition, because the Final Rule relates solely to agency procedure and practice, it is not subject to the 30-day delayed effective date for substantive rules under section 553(d) of the Administrative Procedure Act, 5 U.S.C. 551 *et seq.* Because no notice of proposed rulemaking is required, the requirements of the Regulatory Flexibility Act, 5 U.S.C. 601(2) do not apply. Finally, the Bureau has determined that this Final Rule does not impose any new recordkeeping, reporting, or disclosure requirements on covered entities or members of the public that would be collections of

information requiring approval under 44 U.S.C. 3501. *et seq.*

List of Subjects in 12 CFR Part 1080

Administrative practice and procedure, Banking, Banks, Consumer protection, Credit, Credit unions, Investigations, Law enforcement, National banks, Savings associations, Trade practices.

For the reasons set forth in the preamble, the Bureau of Consumer Financial Protection revises part 1080 to Chapter X in Title 12 of the Code of Federal Regulations to read as follows:

PART 1080—RULES RELATING TO INVESTIGATIONS

Sec.

- 1080.1 Scope.
- 1080.2 Definitions.
- 1080.3 Policy as to private controversies.
- 1080.4 Initiating and conducting investigations.
- 1080.5 Notification of purpose.
- 1080.6 Civil investigative demands.
- 1080.7 Investigational hearings.
- 1080.8 Withholding requested material.
- 1080.9 Rights of witnesses in investigations.
- 1080.10 Noncompliance with civil investigative demands.
- 1080.11 Disposition.
- 1080.12 Orders requiring witnesses to testify or provide other information and granting immunity.
- 1080.13 Custodians.
- 1080.14 Confidential treatment of demand material and non-public nature of investigations.

Authority: Pub. L. 111–203, Title X, 12 U.S.C. 5481 *et seq.*

§ 1080.1 Scope.

The rules of this part apply to Bureau investigations conducted pursuant to section 1052 of the Dodd-Frank Act, 12 U.S.C. 5562.

§ 1080.2 Definitions.

For the purposes of this part, unless explicitly stated to the contrary:

Bureau means the Bureau of Consumer Financial Protection.

Bureau investigation means any inquiry conducted by a Bureau investigator for the purpose of ascertaining whether any person is or has been engaged in any conduct that is a violation.

Bureau investigator means any attorney or investigator employed by the Bureau who is charged with the duty of enforcing or carrying into effect any Federal consumer financial law.

Custodian means the custodian or any deputy custodian designated by the Bureau for the purpose of maintaining custody of information produced pursuant to this part.

Director means the Director of the Bureau or a person authorized to

perform the functions of the Director in accordance with the law.

Documentary material means the original or any copy of any book, document, record, report, memorandum, paper, communication, tabulation, chart, log, electronic file, or other data or data compilation stored in any medium, including electronically stored information.

Dodd-Frank Act means the Dodd-Frank Wall Street Reform and Consumer Financial Protection Act of 2010, as amended, Public Law 111–203 (July 21, 2010), Title X, codified at 12 U.S.C. 5481 *et seq.*

Electronically stored information (ESI) means any information stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form.

Office of Enforcement means the office of the Bureau responsible for enforcement of Federal consumer financial law.

Person means an individual, partnership, company, corporation, association (incorporated or unincorporated), trust, estate, cooperative organization, or other entity.

Violation means any act or omission that, if proved, would constitute a violation of any provision of Federal consumer financial law.

§ 1080.3 Policy as to private controversies.

The Bureau shall act only in the public interest and will not initiate an investigation or take other enforcement action when the alleged violation is merely a matter of private controversy and does not tend to affect adversely the public interest.

§ 1080.4 Initiating and conducting investigations.

The Assistant Director of the Office of Enforcement and the Deputy Assistant Directors of the Office of Enforcement have the nondelegable authority to initiate investigations. Bureau investigations are conducted by Bureau investigators designated and duly authorized under section 1052 of the Dodd-Frank Act, 12 U.S.C. 5562, to conduct such investigations. Bureau investigators are authorized to exercise and perform their duties in accordance with the laws of the United States and the regulations of the Bureau.

§ 1080.5 Notification of purpose.

Any person compelled to furnish documentary material, tangible things, written reports or answers to questions, oral testimony, or any combination of

such material, answers, or testimony to the Bureau shall be advised of the nature of the conduct constituting the alleged violation that is under investigation and the provisions of law applicable to such violation.

§ 1080.6 Civil investigative demands.

(a) *In general.* In accordance with section 1052(c) of the Act, the Director of the Bureau, the Assistant Director of the Office of Enforcement, and the Deputy Assistant Directors of the Office of Enforcement, have the nondelegable authority to issue a civil investigative demand in any Bureau investigation directing the person named therein to produce documentary material for inspection and copying or reproduction in the form or medium requested by the Bureau; to submit tangible things; to provide a written report or answers to questions; to appear before a designated representative at a designated time and place to testify about documentary material, tangible things, or other information; and to furnish any combination of such material, things, answers, or testimony.

(1) *Documentary material.* (i) Civil investigative demands for the production of documentary material shall describe each class of material to be produced with such definiteness and certainty as to permit such material to be fairly identified, prescribe a return date or dates that will provide a reasonable period of time within which the material so demanded may be assembled and made available for inspection and copying or reproduction, and identify the custodian to whom such material shall be made available. Documentary material for which a civil investigative demand has been issued shall be made available as prescribed in the civil investigative demand.

(ii) Production of documentary material in response to a civil investigative demand shall be made under a sworn certificate, in such form as the demand designates, by the person to whom the demand is directed or, if not a natural person, by any person having knowledge of the facts and circumstances relating to such production, to the effect that all of the documentary material required by the demand and in the possession, custody, or control of the person to whom the demand is directed has been produced and made available to the custodian.

(2) *Tangible things.* (i) Civil investigative demands for tangible things shall describe each class of tangible things to be produced with such definiteness and certainty as to permit such things to be fairly identified, prescribe a return date or

dates which will provide a reasonable period of time within which the things so demanded may be assembled and submitted, and identify the custodian to whom such things shall be submitted.

(ii) Submissions of tangible things in response to a civil investigative demand shall be made under a sworn certificate, in such form as the demand designates, by the person to whom the demand is directed or, if not a natural person, by any person having knowledge of the facts and circumstances relating to such production, to the effect that all of the tangible things required by the demand and in the possession, custody, or control of the person to whom the demand is directed have been submitted to the custodian.

(3) *Written reports or answers to questions.* (i) Civil investigative demands for written reports or answers to questions shall propound with definiteness and certainty the reports to be produced or the questions to be answered, prescribe a date or dates at which time written reports or answers to questions shall be submitted, and identify the custodian to whom such reports or answers shall be submitted.

(ii) Each reporting requirement or question in a civil investigative demand shall be answered separately and fully in writing under oath. Responses to a civil investigative demand for a written report or answers to questions shall be made under a sworn certificate, in such form as the demand designates, by the person to whom the demand is directed or, if not a natural person, by any person responsible for answering each reporting requirement or question, to the effect that all of the information required by the demand and in the possession, custody, control, or knowledge of the person to whom the demand is directed has been submitted to the custodian.

(4) *Oral testimony.* (i) Civil investigative demands for the giving of oral testimony shall prescribe a date, time, and place at which oral testimony shall be commenced, and identify a Bureau investigator who shall conduct the investigation and the custodian to whom the transcript of such investigation shall be submitted. Oral testimony in response to a civil investigative demand shall be taken in accordance with the procedures for investigational hearings prescribed by §§ 1080.7 and 1080.9 of this part.

(ii) Where a civil investigative demand requires oral testimony from an entity, the civil investigative demand shall describe with reasonable particularity the matters for examination and the entity must designate one or more officers, directors, or managing

agents, or designate other persons who consent to testify on its behalf. Unless a single individual is designated by the entity, the entity must designate the matters on which each designee will testify. The individuals designated must testify about information known or reasonably available to the entity and their testimony shall be binding on the entity.

(b) *Manner and form of production of ESI.* When a civil investigative demand requires the production of ESI, it shall be produced in accordance with the instructions provided by the Bureau regarding the manner and form of production. Absent any instructions as to the form for producing ESI, ESI must be produced in the form in which it is ordinarily maintained or in a reasonably usable form.

(c) *Meet and confer.* The recipient of a civil investigative demand shall meet and confer with a Bureau investigator within 10 calendar days after receipt of the demand or before the deadline for filing a petition to modify or set aside the demand, whichever is earlier, to discuss and attempt to resolve all issues regarding compliance with the civil investigative demand. The Assistant Director of the Office of Enforcement and the Deputy Assistant Directors of the Office of Enforcement may authorize the waiver of this requirement for routine third-party civil investigative demands or in other circumstances where he or she determines that a meeting is unnecessary. The meeting may be in person or by telephone.

(1) *Personnel.* The recipient must make available at the meeting personnel with the knowledge necessary to resolve any issues relevant to compliance with the demand. Such personnel could include individuals knowledgeable about the recipient's information or records management systems and/or the recipient's organizational structure.

(2) *ESI.* If the civil investigative demand seeks ESI, the recipient shall ensure that a person familiar with its ESI systems and methods of retrieval participates in the meeting.

(3) *Petitions.* The Bureau will not consider petitions to set aside or modify a civil investigative demand unless the recipient has meaningfully engaged in the meet and confer process described in this subsection and will consider only issues raised during the meet and confer process.

(d) *Compliance.* The Assistant Director of the Office of Enforcement and the Deputy Assistant Directors of the Office of Enforcement are authorized to negotiate and approve the terms of satisfactory compliance with civil investigative demands and, for good

cause shown, may extend the time prescribed for compliance.

(e) *Petition for order modifying or setting aside demand—in general.* Any petition for an order modifying or setting aside a civil investigative demand shall be filed with the Executive Secretary of the Bureau with a copy to the Assistant Director of the Office of Enforcement within 20 calendar days after service of the civil investigative demand, or, if the return date is less than 20 calendar days after service, prior to the return date. Such petition shall set forth all factual and legal objections to the civil investigative demand, including all appropriate arguments, affidavits, and other supporting documentation. The attorney who objects to a demand must sign any objections.

(1) *Statement.* Each petition shall be accompanied by a signed statement representing that counsel for the petitioner has conferred with counsel for the Bureau pursuant to section 1080.6(c) in a good-faith effort to resolve by agreement the issues raised by the petition and has been unable to reach such an agreement. If some of the matters in controversy have been resolved by agreement, the statement shall specify the matters so resolved and the matters remaining unresolved. The statement shall recite the date, time, and place of each such meeting between counsel, and the names of all parties participating in each such meeting.

(2) *Extensions of time.* The Assistant Director of the Office of Enforcement and the Deputy Assistant Directors of the Office of Enforcement are authorized to rule upon requests for extensions of time within which to file such petitions. Requests for extensions of time are disfavored.

(3) *Bureau investigator response.* Bureau investigators may, without serving the petitioner, provide the Director with a statement setting forth any factual and legal response to a petition for an order modifying or setting aside the demand.

(4) *Disposition.* The Director has the authority to rule upon a petition for an order modifying or setting aside a civil investigative demand. The order may be served on the petitioner via email, facsimile, or any other method reasonably calculated to provide notice of the order to the petitioner.

(f) *Stay of compliance period.* The timely filing of a petition for an order modifying or setting aside a civil investigative demand shall stay the time permitted for compliance with the portion challenged. If the petition is denied in whole or in part, the ruling will specify a new return date.

(g) *Public disclosure.* All such petitions and the Director's orders in response to those petitions are part of the public records of the Bureau unless the Bureau determines otherwise for good cause shown. Any showing of good cause must be made no later than the time the petition is filed.

§ 1080.7 Investigational hearings.

(a) Investigational hearings, as distinguished from hearings in adjudicative proceedings, may be conducted pursuant to a civil investigative demand for the giving of oral testimony in the course of any Bureau investigation, including inquiries initiated for the purpose of determining whether or not a respondent is complying with an order of the Bureau.

(b) Investigational hearings shall be conducted by any Bureau investigator for the purpose of hearing the testimony of witnesses and receiving documentary material, tangible things, or other information relating to any subject under investigation. Such hearings shall be under oath or affirmation and stenographically reported, and a transcript thereof shall be made a part of the record of the investigation. The Bureau investigator conducting the investigational hearing also may direct that the testimony be recorded by audio, audiovisual, or other means, in which case the recording shall be made a part of the record of the investigation as well.

(c) In investigational hearings, the Bureau investigators shall exclude from the hearing room all persons except the person being examined, his or her counsel, the officer before whom the testimony is to be taken, any investigator or representative of an agency with which the Bureau is engaged in a joint investigation, and any individual transcribing or recording such testimony. At the discretion of the Bureau investigator, and with the consent of the person being examined, persons other than those listed in this paragraph may be present in the hearing room. The Bureau investigator shall certify or direct the individual transcribing the testimony to certify on the transcript that the witness was duly sworn and that the transcript is a true record of the testimony given by the witness. A copy of the transcript shall be forwarded promptly by the Bureau investigator to the custodian designated in section 1080.13.

§ 1080.8 Withholding requested material.

(a) Any person withholding material responsive to a civil investigative demand or any other request for

production of material shall assert a claim of privilege not later than the date set for the production of material. Such person shall, if so directed in the civil investigative demand or other request for production, submit, together with such claim, a schedule of the items withheld which states, as to each such item, the type, specific subject matter, and date of the item; the names, addresses, positions, and organizations of all authors and recipients of the item; and the specific grounds for claiming that the item is privileged. The person who submits the schedule and the attorney stating the grounds for a claim that any item is privileged must sign it.

(b) A person withholding material solely for reasons described in this subsection shall comply with the requirements of this subsection in lieu of filing a petition for an order modifying or setting aside a civil investigative demand pursuant to section 1080.6(e).

(c) Disclosure of privileged or protected information or communications produced pursuant to a civil investigative demand shall be handled as follows:

(1) The disclosure of privileged or protected information or communications shall not operate as a waiver with respect to the Bureau if:

(i) The disclosure was inadvertent;

(ii) The holder of the privilege or protection took reasonable steps to prevent disclosure; and

(iii) The holder promptly took reasonable steps to rectify the error, including notifying a Bureau investigator of the claim of privilege or protection and the basis for it.

(2) After being notified, the Bureau investigator must promptly return, sequester, or destroy the specified information and any copies; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if he or she disclosed it before being notified; and, if appropriate, may sequester such material until such time as a hearing officer or court rules on the merits of the claim of privilege or protection. The producing party must preserve the information until the claim is resolved.

(3) The disclosure of privileged or protected information or communications shall waive the privilege or protection with respect to the Bureau as to undisclosed information or communications only if:

(i) The waiver is intentional;

(ii) The disclosed and undisclosed information or communications concern the same subject matter; and

(iii) They ought in fairness to be considered together.

§ 1080.9 Rights of witnesses in investigations.

(a) Any person compelled to submit documentary material, tangible things, or written reports or answers to questions to the Bureau, or to testify in an investigational hearing, shall be entitled to retain a copy or, on payment of lawfully prescribed costs, request a copy of the materials, things, reports, or written answers submitted, or a transcript of his or her testimony. The Bureau, however, may for good cause deny such a request and limit the witness to inspection of the official transcript of the testimony. Upon completion of transcription of the testimony of the witness, the witness shall be offered an opportunity to read the transcript of his or her testimony. Any changes by the witness shall be entered and identified upon the transcript by the Bureau investigator with a statement of the reasons given by the witness for making such changes. The transcript shall then be signed by the witness and submitted to the Bureau unless the witness cannot be found, is ill, waives in writing his or her right to signature, or refuses to sign. If the signed transcript is not submitted to the Bureau within 30 calendar days of the witness being afforded a reasonable opportunity to review it, the Bureau investigator, or the individual transcribing the testimony acting at the Bureau investigator's direction, shall sign the transcript and state on the record the fact of the waiver, illness, absence of the witness, or the refusal to sign, together with any reasons given for the failure to sign.

(b) Any witness compelled to appear in person at an investigational hearing may be accompanied, represented, and advised by counsel as follows:

(1) Counsel for a witness may advise the witness, in confidence and upon the initiative of either counsel or the witness, with respect to any question asked of the witness where it is claimed that a witness is privileged to refuse to answer the question. Counsel may not otherwise consult with the witness while a question directed to the witness is pending.

(2) Any objections made under the rules in this part shall be made only for the purpose of protecting a constitutional or other legal right or privilege, including the privilege against self-incrimination. Neither the witness nor counsel shall otherwise object or refuse to answer any question. Any objection during an investigational hearing shall be stated concisely on the record in a nonargumentative and nonsuggestive manner. Following an objection, the examination shall proceed

and the testimony shall be taken, except for testimony requiring the witness to divulge information protected by the claim of privilege or work product.

(3) Counsel for a witness may not, for any purpose or to any extent not allowed by paragraphs (b)(1) and (2) of this section, interrupt the examination of the witness by making any objections or statements on the record. Petitions challenging the Bureau's authority to conduct the investigation or the sufficiency or legality of the civil investigative demand shall be addressed to the Bureau in advance of the hearing in accordance with § 1080.6(e). Copies of such petitions may be filed as part of the record of the investigation with the Bureau investigator conducting the investigational hearing, but no arguments in support thereof will be allowed at the hearing.

(4) Following completion of the examination of a witness, counsel for the witness may, on the record, request that the Bureau investigator conducting the investigational hearing permit the witness to clarify any of his or her answers. The grant or denial of such request shall be within the sole discretion of the Bureau investigator conducting the hearing.

(5) The Bureau investigator conducting the hearing shall take all necessary action to regulate the course of the hearing to avoid delay and to prevent or restrain disorderly, dilatory, obstructionist, or contumacious conduct, or contemptuous language. Such Bureau investigator shall, for reasons stated on the record, immediately report to the Bureau any instances where an attorney has allegedly refused to comply with his or her obligations under the rules in this part, or has allegedly engaged in disorderly, dilatory, obstructionist, or contumacious conduct, or contemptuous language in the course of the hearing. The Bureau will thereupon take such further action, if any, as the circumstances warrant, including actions consistent with those described in 12 CFR 1081.107(c) to suspend or disbar the attorney from further practice before the Bureau or exclude the attorney from further participation in the particular investigation.

§ 1080.10 Noncompliance with civil investigative demands.

(a) In cases of failure to comply in whole or in part with Bureau civil investigative demands, appropriate action may be initiated by the Bureau, including actions for enforcement.

(b) The Director, the Assistant Director of the Office of Enforcement,

and the General Counsel of the Bureau are authorized to:

(1) Institute, on behalf of the Bureau, an enforcement proceeding in the district court of the United States for any judicial district in which a person resides, is found, or transacts business, in connection with the failure or refusal of such person to comply with, or to obey, a civil investigative demand in whole or in part if the return date or any extension thereof has passed; and

(2) Seek civil contempt or other appropriate relief in cases where a court order enforcing a civil investigative demand has been violated.

§ 1080.11 Disposition.

(a) When the facts disclosed by an investigation indicate that an enforcement action is warranted, further proceedings may be instituted in Federal or State court or pursuant to the Bureau's administrative adjudicatory process. Where appropriate, the Bureau also may refer investigations to appropriate Federal, State, or foreign governmental agencies.

(b) When the facts disclosed by an investigation indicate that an enforcement action is not necessary or would not be in the public interest, the investigational file will be closed. The matter may be further investigated, at any time, if circumstances so warrant.

(c) The Assistant Director of the Office of Enforcement and the Deputy Assistant Directors of the Office of Enforcement are authorized to close Bureau investigations.

§ 1080.12 Orders requiring witnesses to testify or provide other information and granting immunity.

The Director has the nondelegable authority to request approval from the Attorney General of the United States for the issuance of an order requiring a witness to testify or provide other information and granting immunity under 18 U.S.C. 6004.

§ 1080.13 Custodians.

(a) The Bureau shall designate a custodian and one or more deputy custodians for material to be delivered pursuant to a civil investigative demand in an investigation. The custodian shall have the powers and duties prescribed by 12 CFR 1070.3 and section 1052 of the Act, 12 U.S.C. 5562. Deputy custodians may perform all of the duties assigned to custodians.

(b) Material produced pursuant to a civil investigative demand, while in the custody of the custodian, shall be for the official use of the Bureau in accordance with the Act; but such material shall upon reasonable notice to the custodian

be made available for examination by the person who produced such material, or his or her duly authorized representative, during regular office hours established for the Bureau.

§ 1080.14 Confidential treatment of demand material and non-public nature of investigations.

(a) Documentary materials, written reports, answers to questions, tangible things or transcripts of oral testimony the Bureau receives in any form or format pursuant to a civil investigative demand are subject to the requirements and procedures relating to the disclosure of records and information set forth in part 1070 of this title.

(b) Bureau investigations generally are non-public. Bureau investigators may disclose the existence of an investigation to potential witnesses or third parties to the extent necessary to advance the investigation.

Dated: June 4, 2012.

Richard Cordray,

Director, Bureau of Consumer Financial Protection.

[FR Doc. 2012-14047 Filed 6-28-12; 8:45 am]

BILLING CODE 4810-AM-P

BUREAU OF CONSUMER FINANCIAL PROTECTION

12 CFR Part 1082

[Docket No. CFPB-2011-0005]

RIN 3170-AA02

State Official Notification Rule

AGENCY: Bureau of Consumer Financial Protection.

ACTION: Final rule.

SUMMARY: The Dodd-Frank Wall Street Reform and Consumer Financial Protection Act of 2010 (Dodd-Frank Act) requires the Bureau of Consumer Financial Protection (Bureau) to prescribe rules establishing procedures that govern the process by which State Officials notify the Bureau of actions undertaken pursuant to the authority granted to the States to enforce the Dodd-Frank Act or regulations prescribed thereunder. This final State Official Notification Rule (Final Rule) sets forth the procedures to govern this process.

DATES: The Final Rule is effective June 29, 2012.

FOR FURTHER INFORMATION CONTACT:

Veronica Spicer, Office of Enforcement, Consumer Financial Protection Bureau, 1700 G Street NW., Washington, DC 20552, at (202) 435-7545.

SUPPLEMENTARY INFORMATION:

I. Background

The Dodd-Frank Wall Street Reform and Consumer Financial Protection Act of 2010 (Dodd-Frank Act) was signed into law on July 21, 2010. Title X of the Dodd-Frank Act established the Bureau to regulate the offering and provision of consumer financial products or services under the Federal consumer financial laws. Section 1042 of the Dodd-Frank Act, 12 U.S.C. 5552, governs the enforcement powers of the States under the Dodd-Frank Act. Under section 1042(a), a State attorney general or regulator (State Official) may bring an action to enforce Title X of the Dodd-Frank Act and regulations issued thereunder. Prior to initiating any such action, the State Official is required to provide notice of the action to the Bureau and the prudential regulator, if any, pursuant to section 1042(b) of the Dodd-Frank Act. Section 1042(b) further authorizes the Bureau to intervene in the State Official's action as a party, remove the action to a Federal district court, and appeal any order or judgment.

Pursuant to section 1042(c) of the Dodd-Frank Act, the Bureau is required to issue regulations implementing the requirements of section 1042. On July 28, 2011, the Bureau promulgated the State Official Notification Rule (Interim Final Rule) with a request for comment. The comment period for the Interim Final Rule ended on September 26, 2011. After reviewing and considering the issues raised by the comments, the Bureau now promulgates the Final Rule establishing a procedure for the timing and content of the notice required to be provided by State Officials pursuant to section 1042(b) of the Dodd-Frank Act, 12 U.S.C. 5552(b).

II. Summary of the Final Rule

Like the Interim Final Rule, the Final Rule implements a procedure for the timing and content of the notice required by section 1042(b), sets forth the responsibilities of the recipients of the notice, and specifies the rights of the Bureau to participate in actions brought by State Officials under section 1042(a) of the Dodd-Frank Act. In drafting the Final Rule, the Bureau endeavored to create a process that would provide both the Bureau and, where applicable, the prudential regulators with timely notice of pending actions and account for the investigation and litigation needs of State regulators and law enforcement agencies. In keeping with this approach, the Final Rule provides for a default notice period of at least ten calendar days, with exceptions for emergencies and other extenuating circumstances,

and requires substantive notice that is both straightforward and comprehensive. The Final Rule further makes clear that the Bureau can intervene as a party in an action brought by a State Official under Title X of the Dodd-Frank Act or a regulation prescribed thereunder, provides for the confidential treatment of non-public information contained in the notice if a State so requests, and provides that provision of notice shall not be deemed a waiver of any applicable privilege. In addition, the Final Rule specifies that the notice provisions do not create any procedural or substantive rights for parties in litigation against the United States or against a State that brings an action under Title X of the Dodd-Frank Act or a regulation prescribed thereunder.

III. Legal Authority

Section 1042(c) of the Dodd-Frank Act authorizes the Bureau to prescribe regulations implementing the requirements of section 1042(b). In addition, the Bureau has general rulemaking authority pursuant to section 1022(b)(1) of the Dodd-Frank Act to prescribe rules to enable the Bureau to administer and carry out the purposes and objectives of the Federal consumer financial laws and to prevent evasions thereof.

IV. Overview of Comments Received

In response to the Interim Final Rule, the Bureau received several comments. Four letters were received from associations representing the financial industry, two letters were received from financial industry regulators and supervisors, and one letter was received from an individual consumer. The Bureau also received a comment letter from a financial industry regulator in response to its **Federal Register** notification of November 21, 2011, regarding the information collection requirements associated with the Interim Final Rule pursuant to the Paperwork Reduction Act of 1995 (PRA), Public Law 104-13. All of the comments are available for review on www.regulations.gov.

The financial industry associations' comments fell into several general categories. Several comments expressed concerns about the Bureau's ability to maintain confidentiality for notification materials received by the Bureau. Other commenters requested clarity as to the type of actions for which the Bureau requires notification. One commenter requested that the Bureau require uniform interpretation by States of all Federal law within the Bureau's jurisdiction.

Exhibit 5

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CONFIDENTIAL

June 16, 2020

VIA ELECTRONIC DELIVERY

Vanessa Buchko, Esq.
Enforcement Attorney
Supervision, Fair Lending and Enforcement
Bureau of Consumer Financial Protection
Washington, DC 20552

RE: Credit Acceptance Corporation

Dear Vanessa:

We write to memorialize the requests made during our June 11, 2020 meet-and-confer in connection with the Civil Investigative Demand issued by the Bureau to Credit Acceptance Corporation (“Credit Acceptance” or the “Company”) on June 1, 2020 (the “CID”).¹

* * *

The relevant background is set forth in our May 20, 2020 correspondence, which is incorporated herein by reference. Briefly, the Bureau issued its first CID in this matter on April 22, 2019, in response to which the Company produced more than 290,000

¹ This letter and other documents and information provided in this matter (the “Confidential Material”) constitute confidential investigative information pursuant to 12 C.F.R. § 1070.2(h). The Confidential Material is confidential and proprietary, the public disclosure of which may place the Company at a competitive disadvantage or otherwise cause irreparable harm. Accordingly, we request that the Confidential Material be treated as exempt from public disclosure under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b), and 12 C.F.R. §§ 1070.20 and 1070.40-.47. We also request that the Company receive notification and the opportunity to contest disclosure if the Confidential Material becomes the subject of a FOIA request.

documents comprising more than 3 million pages, and more than 1.7 terabytes of data. The Bureau issued a second CID on August 30, 2019, to which the Company responded on September 23, 2019.

The Bureau issued a third CID on May 7, 2020. The Company objected to this CID on the grounds that (i) many of the requests exceeded the CID's notification of purpose; and (ii) the CID improperly demanded an investigational hearing relating to the Company's prior assertions of privilege. Enforcement indicated that they were not in agreement with the Company's position, but nonetheless withdrew the CID and issued a fourth CID on June 1, 2020. The fourth CID, which is the subject of this modification request, is virtually identical to the third CID, with the exception of an enlarged Notification of Purpose and the deletion of the request for an investigational hearing.

The Notification of Purpose in the fourth (June 1) CID states:

The purpose of this investigation is to determine whether auto lenders or associated persons, in connection with originating auto loans (including marketing and selling products ancillary to such loans), servicing loans, collecting debts (including through repossessing vehicles), or consumer reporting, have: (1) made false or misleading representations to consumers, failed to ensure that borrowers received title to their vehicles, or failed to notify consumers of collections lawsuits filed against them, in a manner that is unfair, deceptive, or abusive in violation of §§ 1031 and 1036 of the Consumer Financial Protection Act of 2010 (CFPA), 12 U.S.C. §§ 5531, 5536; (2) knowingly or recklessly provided substantial assistance to others in such violations, also in violation of §§ 1031 and 1036 of the CFPA, 12 U.S.C. §§ 5531, 5536; (3) failed to perform the duties of a furnisher of information to consumer reporting agencies in a manner that violates the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq., principally § 1681s-2, or Regulation V, principally Subpart E; or (4) failed to follow the requirements for providing disclosures to consumers or used advertisements with prohibited content in a manner that violates Regulation Z, 12 C.F.R. Part 1026, principally Subpart C, implementing the Truth in Lending Act, 15 U.S.C. 1601 et seq. The purpose of this investigation is also to determine whether Bureau action to obtain legal or equitable relief would be in the public interest.

* * *

The Consumer Financial Protection Act requires that a CID "state the nature of the conduct constituting the alleged violation which is under investigation and the provision of law applicable to such violation." 12 U.S.C. § 5562(c)(2); *see also* 12

C.F.R. § 1080.5. Here, the Notification of Purpose specifically identifies four subjects of investigation:

(1) Providing Consumers with Titles: Whether the Company has “failed to ensure that borrowers received title to their vehicles.”²

(2) Notifying Consumers of Lawsuits: Whether the Company has “failed to notify consumers of collections lawsuits filed against them.”

(3) Data Furnishing: Whether the Company has “failed to perform the duties of a furnisher of information to consumer reporting agencies”

(4) Truth-in-Lending Compliance: Whether the Company has “failed to follow the requirements for providing disclosures to consumers or used advertisements with prohibited content in a manner that violates Regulation Z.”

In the meet-and-confer, the Enforcement Staff stated that they believe that the Notification of Purpose is broader than these four topics. In support of this argument, the Staff pointed to the fact that the Notification of Purpose (i) contains a reference to “originating” and “servicing” loans; and (ii) indicates that the Bureau wishes to investigate “false or misleading representations to consumers.”

Neither of those clauses supports the Staff’s contention that the CID may inquire beyond the four enumerated topics.

As discussed during the meet-and-confer, the reference to “originating” and “servicing” loans precedes the specific requests in the Notification of Purpose and does not describe the “nature of the conduct” being investigated with particularity, as required under 12 U.S.C. § 5562(c)(2). Indeed, the Company’s business consists almost entirely of originating and servicing loans. Accordingly, this generic language—not found in the four specifically enumerated investigation topics—merely serves to say: “The Bureau is investigating the Company’s business.” As such, this preamble does not meaningfully inform the Company *what* is under investigation, and thus provides no support for the numerous requests in the CID that fall outside the four topics in the Notification of Purpose. Tellingly, when we asked what aspects of the Company’s business were beyond the scope of the “originating” and “servicing” language, the Enforcement Staff could only point to “investor reporting”—a subject clearly outside of the Bureau’s jurisdiction.

² The Staff provided no explanation as to why this subject was not included in the Notification of Purpose in the third CID. It is therefore unclear whether this subject was originally in scope, but for some reason not enumerated in the previous Notification of Purpose, or whether this topic has been newly added in the three weeks between the issuance of the third and fourth CIDs.

This lack of particularity stands in contrast to the more detailed descriptions in the Notification of Purpose, such as the clauses relating to providing consumers with titles or notifying consumers of lawsuits. Those descriptions—while still very general—at least permit Credit Acceptance to understand the basic subjects that the Bureau is investigating. In contrast, “originating” and “servicing” provide no “Notification” to Credit Acceptance of the subject of the inquiry.

Nor does the “false or misleading representations” language add any meaningful specificity to the CID. This language was in the third CID’s Notification of Purpose as well, and its location has simply been shifted to the beginning of the first section of the current CID. But as in the third CID, this language does not state the “nature of the conduct” under investigation, but instead is the sort of “perfunctory” statement, such as “unlawful acts and practices,” that does not meet the requirements of 12 U.S.C. § 5562(c)(2). *See CFPB v. Accrediting Council for Independent Colleges and Schools*, 854 F.3d 683, 690 (D.C. Cir. 2017) (“ACICS”).

The lack of specificity of the “false or misleading” representations language can be appreciated by comparing it with other provisions of the Notification of Purpose which *do* appear to comply with the statutory requirement. For example, the Notification of Purpose states that the Bureau is investigating furnishing under Regulation V and Truth-in-Lending compliance under Regulation Z. Those notifications appear to be sufficient, because they inform the Company of what is being investigated and “the provision of law applicable to such violation.” In contrast, “false and misleading representations” is a “broad and non-specific” catch-all that could be (and in this case, is) used to “cast about for potential wrongdoing,” subject only to Enforcement’s discretion. *See ACICS* at 690; *In re: Sealed Case (Admin. Subpoena)*, 42 F.3d 1412, 1418 (D.C. Cir. 1994). This lack of any limiting principle is precisely why this phrase is not a sufficient notification under either the statute’s plain language or the reasoning employed by the courts.

During the meet-and-confer, the Enforcement Staff pointed to this language as supporting their objective of “learning” about the “business as a whole.” Enforcement inquiries and civil investigative demands, however, are not intended to serve as general educational tools, but may be initiated only where there is: “(i) A plausible set of facts that, if proven, would amount to a violation of one or more federal consumer financial laws; (ii) Reason to believe that one or more specific entities may be engaging in the conduct described in those facts; and (iii) Evidence of a magnitude of harm that justifies investment of Office resources.” CFPB Policies and Procedures Manual, Office of Enforcement, at 37. Moreover, the “business as a whole” has [REDACTED]
[REDACTED]

[REDACTED] for the type of extraordinarily broad information gathering that the Enforcement Staff is attempting here.³

At the meet-and-confer, we invited the Enforcement Staff to explain the connection between their requests and the Notification of Purpose. The Staff generally declined to do so, with the exception of Interrogatory 14, which relates to the Company's welcome letter and payment notification letter. In particular, the Enforcement Staff indicated that they believe that those letters are relevant to compliance with Regulation V, insofar as they may contain the address to which consumer may send any disputes. We appreciate this clarification and agree with the Enforcement Staff's point in this regard.

However, as to all other requests that we have challenged, the Enforcement Staff appears to be relying solely on the "originating" and "servicing" or "false or misleading" language from the Notification of Purpose. Inasmuch as we disagree that these portions of the Notification of Purpose support these requests, we respectfully request that the CID be modified as follows:

(1) We request that the following items be deleted in their entirety: Interrogatories 2, 6, 8, 9, 10, 12, 13, 16; Written Reports 4, 5, 6; and Document Requests 1, 8. These requests relate, among other things, to GPS Starter Interrupter Devices, vehicle pricing, Guaranteed Asset Protection, ("GAP") and vehicle service contract sales penetration, a GAP brochure, employee compensation based on GAP sales, sales training videos, reports relating to monitoring of approved auto dealerships, and the Customer Approval Sheet—all of which are outside of the scope of the Notification of Purpose.

(2) We request that the Bureau confirm that as to the following items, Credit Acceptance may comply with the CID by providing responsive information relating to (i) providing consumers with titles; (ii) notifying consumers of lawsuits; (iii) data furnishing; and (iv) Truth-in-Lending compliance: Interrogatories 3, 4, 5, 7, 11, 14, 15; Written Reports 3, 4, 7, 8, 9, 11, 12; Document Requests 2, 3, 5, 7.

(3) The Company is prepared to respond to the requests for information that are supported in whole or in part by the Notification of Purpose along the same basic schedule discussed in connection with the third CID. Consequently, we request that the dates for compliance for the items specified in item (2) above as well as the other items in the CID not listed in item (1), be adjusted as follows:

³ The April 2019 CID directly followed a colloquy between the Director and Congresswoman Rashida Tlaib, in which the congresswoman inaccurately implied that Credit Acceptance was subject to a Bureau consent order. *See* Testimony of Director Kathleen L. Kraninger before the Committee on Financial Services, U.S. House of Representatives, March 7, 2019. Credit Acceptance [REDACTED] [REDACTED] has never been subject to a Bureau consent order, thus raising questions about whether the Bureau's inquiry was initiated based on a mistaken premise.

July 1, 2020

Interrogatories 1, 3, 4, 5, 7, 11, 14, 15
Written Reports 7
Document Requests 2, 3

August 5, 2020

Written Reports 1, 2, 3, 8, 9, 10, 12
Document Requests 4, 5, 6, 7

September 4, 2020

Written Reports 11

* * *

At the June 11 meet-and-confer, the Enforcement Staff asked for additional information relating to Request for Written Report 8(j), which asks the Company to “[i]dentify the entity that communicated to the dealer the decision to impose the corrective action (if this decision was made by a CAC employee, include the name, title, department, and employee identifier).” We confirm that the Company does not maintain electronic data identifying the specific Company employee that would have communicated this information to the Dealer. However, the Company can identify the individual that handled any complaint that led to the corrective action, as well as the Market Area Manager for the Dealer, and will do so in response to this request.

At the meet-and-confer, the Enforcement Staff also asked, in connection with Request for Written Report 8, for the dates that the Company: (i) took corrective action based on a privileged investigation by Compliance or as the result of a privileged remediation performed at the direction of the Company’s attorneys; (ii) put the Dealer on funding hold due to a title issue or stopped doing business with the Dealer due to a title issue or certain other reasons; and (iii) terminated the Dealer. With respect to points (i) and (iii), the Company expects that it will be able to provide these dates in response to this request. With respect to point (ii), the Company will provide the dates to the extent that they are available.

* * *

In the Enforcement Staff’s email withdrawing the third CID, the Staff noted the Bureau’s interest in the “efficiency” of its investigation. We appreciate that sentiment, and thus, notwithstanding our disagreement regarding the scope of the CID and its lack of connection to the Notification of Purpose, we once again invite you to engage in an open dialogue with the Company about *any* concerns the Bureau may have. There is no reason

Vanessa Buchko, Esq.
June 16, 2020
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to wait until the end of a protracted investigation to discuss and address issues of concern; and such approach would be the most efficient by far.

In addition, if you believe that we have misunderstood your position with respect to any of the issues discussed in this letter, we would be happy to schedule a further call with you and/or senior officials from Enforcement or Bureau leadership.

Given the limited time permitted under the Bureau's rules for filing a petition to modify or set aside the CID, we ask that you respond by 5 p.m. on Wednesday, June 17.

Sincerely,

A handwritten signature in dark ink, appearing to read "Anand S. Raman". The signature is fluid and cursive, with the first name "Anand" being more prominent.

Anand S. Raman

cc: Lucy Morris, Esq.

Exhibit 6

1700 G Street, NW
Washington, DC 20552



June 16, 2020

Via Email

Anand S. Raman
Darren M. Welch
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005
Anand.Raman@skadden.com
Darren.Welch@skadden.com

Re: Civil Investigative Demand served on Credit Acceptance Corp. on June 1, 2020

Dear Mr. Raman and Mr. Welch:

This letter modifies the terms for compliance with the civil investigative demand (CID), dated June 1, 2020, issued to Credit Acceptance Corporation (the “Company” or “CAC”) by the Bureau of Consumer Financial Protection (the “Bureau”), as permitted by 12 C.F.R. § 1080.6(d). This letter sets forth the only modifications to the CID. The Bureau’s willingness to approve these modifications is based, in part, on the Company’s representations described or referred to below. The production of information and documents in accordance with the modifications described below constitutes compliance with the CID.

Notification of Purpose

The Company argues that many of the requests in the CID have little or no nexus to the Notification of Purpose. It requests that the Bureau delete in their entirety Interrogatories 2, 6, 7, 8, 10, 12, 13, 16; Written Reports 4, 5, 6; and Document Requests 1, 8. It also requests that the Bureau limit the scope of Interrogatories 3, 4, 5, 7, 11, 14, 15; Written Reports 3, 4, 7, 8, 9, and 11, 12; and Document Requests 2, 3, 5, 7 to only relate to providing consumers with titles, notifying consumers of lawsuits, data furnishing, and truth-in-lending compliance. The Bureau is unable to accept either modification request.

The Notification of Purpose in the June 2020 CID is significantly more detailed than those approved by the Ninth Circuit in *Seila Law* and the Third Circuit in *Heartland Campus Solutions*. See *CFPB v. Seila Law LLC*, 923 F.3d 680, 685 (9th Cir. 2019) (enforcing a CID relating to an investigation into “whether debt relief providers, lead generators, or other unnamed persons are engaging in unlawful acts or practices in

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the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling”); *CFPB v. Heartland Campus Sols.*, 747 F. App'x 44, 46-49 (3d Cir. 2018) (enforcing a CID with a Notification of Purpose referencing whether a student loan servicer had engaged in unfair, deceptive, or abusive acts or practices or had violated the FCRA). Moreover, as the Third Circuit stated, “[n]othing prohibits the CFPB from investigating the totality of [a company’s] business activities.” *Heartland*, 747 F. App'x at 48-49. The Company also has not shown that any specific requests in the CID should be deleted or narrowed as irrelevant to the Bureau’s lawful investigation. *See, e.g., Doe v. United States*, 253 F.3d 256, 266 (6th Cir. 2001) (Administrative subpoenas “should be enforced when ‘the evidence sought by the subpoena [is] not plainly incompetent or irrelevant to any lawful purpose of the [agency] in the discharge of [its] duties.’” (quoting *United States v. Markwood*, 48 F.3d 969, 977 (6th Cir. 1995))); *In re Admin. Subpoena*, 289 F.3d 843, 845 (6th Cir. 2001) (“[W]hen asking whether the documents requested are ‘relevant’ to an investigation, the courts construe broadly the term ‘relevant.’”).

Timing of the Production

The Company did not raise concerns relating to burden during the June 11, 2020 meet-and-confer or in its June 16, 2020 letter to the Bureau. Nevertheless, the Bureau is aware that the COVID-19 pandemic has made the process of obtaining and producing information more challenging for some respondents. The company provided a proposed timeline for responding to the CID. The Bureau agrees to extend the Company’s compliance as follows:

July 1, 2020

Interrogatories 1, 3, 4, 5, 7, 11, 14, 15
Written Report 7
Document Requests 2, 3

August 5, 2020

Written Reports 1, 2, 3, 8, 9, 10, 12
Document Requests 4, 5, 6, 7

September 4, 2020

Interrogatories 2, 6, 8, 9, 10, 12, 13, 16
Written Reports 4, 5, 6, 11
Document Requests 1, 8

The Company must fully comply with the modified CID by **September 4, 2020**.

If the Company withholds information responsive to the CID based on privilege, it must produce a privilege log in accordance with the procedures set forth in the Rules Relating to Investigations § 1080.8 (Withholding Requested Material). *See* 12 C.F.R. § 1080.8. If required, a privilege log is due by the final CID production date of

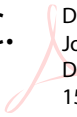
September 4, 2020. In addition, the CAC must provide an unmodified certificate of compliance no later than **September 4, 2020.**

To assist in construing any terms of this letter, the definitions set forth in the CID are incorporated by reference. This letter does not change the Company's responsibilities described in the Document Retention instruction in the CID. Further, nothing in this letter precludes the Bureau from issuing additional CIDs to or seeking discovery from the Company.

If you have any questions regarding the terms outlined above, contact Enforcement Attorney Nina Schichor at (202) 435-9770 or nina.schichor@cfpb.gov.

Sincerely,

John C.
Wells



D g ta y s gned by
John C. We s
Date: 2020.06.16
15:24:33 -04'00'

John C. Wells
Deputy Enforcement Director