

COPY

1 EXPEDITE
2 No Hearing Set
3 Hearing is Set
4 Date:
5 Time:

FILED
AUG 22 2007
SUPERIOR COURT
BETTY J. GOULD
THURSTON COUNTY CLERK

7 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
8 **IN AND FOR THE COUNTY OF THURSTON**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 AUTOMOTIVE CONSULTANT GROUP,
13 LLC., a for-profit Louisiana corporation,
14 CRAIG A. STOWE, as President and member
15 of Automotive Consultant Group, LLC.,
16 individually and on behalf of his marital
community, CAROLYN F. STOWE, as a
member of Automotive Consultant Group,
LLC., individually and on behalf of her marital
community,

17 Defendants.

NO. **07 2 01687 0**

SUMMONS

18
19 TO: Defendants, AUTOMOTIVE CONSULTANT GROUP, LLC.; CRAIG A. STOWE; and
20 CAROLYN F. STOWE

21 A lawsuit has been started against you in the above-entitled court by the STATE OF
22 WASHINGTON, Plaintiff. Plaintiff's claim is stated in the written Complaint, a copy of which
23 is served upon you with this Summons.

24 In order to defend against this lawsuit, you must respond to the Complaint by stating your
25 defense in writing, and serve a copy upon the undersigned attorneys for the Plaintiff within sixty
26 (60) days after the service of this Summons, excluding the day of service, if served personally

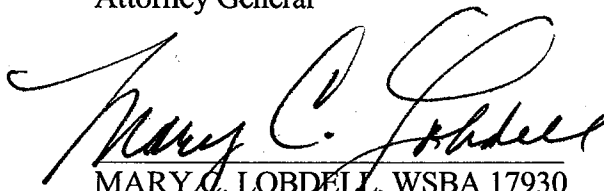
1 upon you outside of the State of Washington, or a default judgment may be entered against you
2 without notice. A default judgment is one where Plaintiff is entitled to what it asks for because
3 you have not responded. If you serve a notice of appearance on the undersigned attorneys, you
4 are entitled to notice before a default judgment may be entered.

5 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
6 that your written response, if any, may be served on time.

7 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
8 of Washington.

9 DATED this 22nd day of August, 2007.

10 ROBERT M. MCKENNA
11 Attorney General



12
13 MARY C. LOBDELL, WSBA 17930
14 Assistant Attorney General
15 1019 Pacific Avenue
16 P.O. Box 2317
17 Tacoma, Washington 98401-2317
18 (253) 593-2256
19 Attorney for Plaintiff
20 State of Washington
21
22
23
24
25
26

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8 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
9 **IN AND FOR THE COUNTY OF THURSTON**

10 STATE OF WASHINGTON,

11 Plaintiff,

12 v.

13 AUTOMOTIVE CONSULTANT GROUP,
14 LLC., a for-profit Louisiana corporation,
15 CRAIG A. STOWE, as President and member
16 of Automotive Consultant Group, LLC.,
17 individually and on behalf of his marital
18 community, CAROLYN F. STOWE, as a
19 member of Automotive Consultant Group,
20 LLC., individually and on behalf of her
21 marital community,

22 Defendants.

NO. **07 2 01687 0**

**COMPLAINT FOR INJUNCTIVE
AND OTHER RELIEF PURSUANT
TO THE UNFAIR BUSINESS—
CONSUMER PROTECTION ACT;
CHAPTER 19.86 RCW**

23 COMES NOW Plaintiff State of Washington, Office of the Attorney General,
24 Consumer Protection Division, by and through its attorneys, Robert M. McKenna, Attorney
25 General, and Mary C. Lobdell, Assistant Attorney General, and brings this action against the
26 Defendants named herein, alleging as follows:

1 **I. JURISDICTION AND VENUE**

2 1.1. This Complaint is filed and these proceedings are instituted under the provisions
3 of Chapter 19.86 RCW, Unfair Business Practices -- Consumer Protection Act; Chapter 46.70
4 RCW, Dealers and Manufacturers Unfair Business Practices; and Chapter 19.170 RCW of the
5 Prizes and Promotions Act. The violations hereinafter alleged have been and are being committed
6 in whole or in part in the state of Washington.
7

8 1.2. The Attorney General is authorized to commence this action pursuant to RCW
9 19.86.080 and RCW 46.70.220.

10 1.3. Jurisdiction over the Defendants is vested in this Court pursuant to RCW
11 19.86.160, RCW 46.70.250 and RCW 4.28.185 because Defendants engaged in conduct violating
12 Chapter 19.86 RCW and Chapter 46.70 RCW and such conduct impacted consumers and
13 businesses in the state of Washington. Jurisdiction over the subject matter of this Complaint is
14 conferred by the above-referenced statutes.
15

16 1.4. Venue of this matter is in Thurston County pursuant to Civil Rule 82.

17 **II. DEFENDANTS**

18 2.1. Defendant, Automotive Consultant Group, LLC is a for-profit Louisiana Limited
19 Liability Company organized under the laws of the state of Louisiana and is located at 3850 North
20 Causeway Blvd., Metairie, LA 70002.
21

22 2.2. Defendant, Craig A. Stowe, is now and has been at all times relevant to this action,
23 President and member of Automotive Consultant Group, LLC, and has individually controlled,
24 directed, participated in, and formulated the policies relating to the acts, practices, and activities of
25
26

1 | said corporation that is the subject matter of this Complaint. Defendant, Craig A. Stowe, is
2 | married, and all acts done by him were done on behalf of the marital community.

3 | 2.3 Defendant Carolyn Stowe, is now and has been at all times relevant to this action a
4 | member of Automotive Consultant Group, LLC, and has individually participated in and
5 | formulated the policies relating to the acts, practices, and activities of said corporation, which is
6 | the subject matter of this Complaint. Defendant, Carolyn Stowe is married, and all acts done by
7 | her were done on behalf of the marital community.
8 |

9 | 2.4. For purposes of this Complaint, the term "Defendants," unless otherwise specified,
10 | shall refer to all Defendants; and when used in conjunction with allegations of unlawful conduct,
11 | shall mean that each Defendant committed such act and/or is legally accountable for such act.
12 |

13 | **III. NATURE OF TRADE OR COMMERCE**

14 | 3.1. Defendants, at all times relevant to this action, are engaged in offering promotional
15 | advertising services, consultation, sales assistance, and materials to dealers of new and used motor
16 | vehicles in the state of Washington. Defendants engaged in promotional advertising services and
17 | assisted in auto sales in the state of Washington, including but not limited to, the Curt Warner
18 | Chevrolet auto dealership in Vancouver, Washington. Defendants are engaged in trade or
19 | commerce within the meaning of RCW 19.86.020.
20 |

21 | 3.2. Defendants are engaged in a business that must comply with the provisions of
22 | Chapter 46.70 RCW, the rules for advertising promulgated by the Department of Licensing in
23 | WAC 308-66-152, the provisions of the Unfair Business Practices of the Consumer Protection
24 | Act, Chapter 19.86, and the provisions of the Prizes and Promotions Act, Chapter 19.170 RCW.
25 |
26 |

1 4.5. Defendants misrepresented the value of the vehicles sold as well as trade-in value
2 by causing to be advertised statements such as “drastically discounted,” “vehicles sold regardless
3 of profit or market value,” and “We Want Your Trade Used car buyers statewide will be on hand,
4 offering you above market value.” *See e.g.* Exhibit A. On information and belief, Defendants
5 cannot clearly show the truth of these statements. Such conduct constitutes a false, misleading or
6 deceptive practice in violation of RCW 46.70.180 and RCW 19.86.020.
7

8 4.6. Defendants developed, promoted or caused to be advertised offers to sell vehicles
9 without disclosing all material limitations, including limitations related to credit, used or new
10 vehicle, time limit and trade-in. *See e.g.* Exhibit A. Advertising any offer in connection with
11 the sale of a vehicle or model or type of vehicle without disclosing all material limitations is a
12 violation of RCW 46.70.180, WAC 308-66-152(4)(c), and RCW 19.86.020.
13

14 4.7. Defendants developed, promoted or caused to be advertised specific prices for
15 specific models or types of vehicles without designating the number of vehicles at that price *See*
16 *e.g.* Exhibit A. Advertising specific prices for specific models or types of vehicles without
17 designating the number of vehicles at that price is a violation of RCW 46.70.180, WAC 308-66-
18 152(4)(i) and RCW 19.86.020.
19

20 4.8. Defendants caused the advertisement of financial terms without the full
21 disclosures required by the Truth in Lending Act, 15 U.S.C. § 1601 *et. seq.*, Regulation Z and 12
22 C.F.R. § 226.24 or RCW 46.70.180(a)-(e). *See e.g.* Exhibit A.

23 4.9. Defendants caused the advertisement of a “price” expressed as a combination of
24 dollar figures and words without providing all component figures and the total dollar figure
25
26

1 | expressed as required by RCW 46.70.180, WAC 308-66-152(4)(l)(i) and RCW 19.86.020. *See*
2 | *e.g.* Exhibit D.

3 | **4.10.** Defendants advertised vehicles manufactured less than two years prior to the date
4 | of advertisement without designating the vehicle as “used,” “demo,” or “demonstrator,” in
5 | violation of WAC 308-66-152(4)(g). *See e.g.* Exhibit A.

7 | **4.11.** Defendants advertised disclaimers and other disclosures in a type size not
8 | sufficiently large to read with reasonable ease and not in reasonably close proximity to each of the
9 | terms that required the disclosure. *See e.g.* Exhibit A.

10 | **4.12.** Defendants failed to disclose in advertisements that a vehicle documentary fee
11 | would be included in sales when Defendant knew or should have known that such fees would be
12 | charged, in violation of RCW 46.70.180(2)(b) and WAC 308-66-152(4)(j). *See e.g.* Exhibit A.

14 | **4.13.** Defendants caused to be advertised “free gas” contrary to Federal Trade
15 | Commission guidelines related to negotiated sales. Using the word “free” in context of a
16 | negotiated sale is a false, misleading or deceptive practice in violation of RCW 46.70.180 and
17 | RCW 19.86.020. *See e.g.* Exhibit A.

18 | **4.14.** Defendants caused to be advertised specific vehicles without disclosing the
19 | number of vehicles available at that price and vehicle identification numbers or license plate
20 | numbers for the specific vehicles advertised in violation of WAC 308-66-152(4)(i)(i)-(ii) and
21 | RCW 19.86.020. *See e.g.* Exhibit A, D.

23 | **4.15.** Defendants caused to be advertised pictures of new vehicles that are not
24 | substantially the same vehicle offered for sale in violation of WAC 308-66-152(4)(d)(i). *See e.g.*
25 | Exhibit A (113000045).

1 5.5. On information and belief, Defendants offered “vacations,” “shopping sprees,”
2 “consumer goods,” and “vehicles” in conjunction with the purchase of a vehicle, without
3 complying with the disclosure requirements of RCW 19.170.030 and RCW 19.170.040 or
4 otherwise disclosing material limitations of the offer. *See e.g.* Exhibit A.
5

6 5.6. Defendants developed, promoted and participated in an advertised contest called
7 “The Main Event” from November 26 through November 30, 2005.

8 5.7. Defendants caused to be advertised a “Scratch, Match & Win” contest in which
9 every mailer was a winner and “win a ‘05 Chevrolet Cavalier.” A copy of the direct mail
10 advertising is attached as Exhibit A.

11 5.8. Defendants disclosed the odds of winning one of the listed prizes in a false,
12 misleading or deceptive manner in violation of RCW 19.170.030(3) and RCW 19.86.020. *See*
13 *e.g.* Exhibit A.
14

15 5.9. Defendant caused to be advertised material limitations of a contest that appeared
16 on the back side of the advertisement and in a type-size that was significantly smaller than the
17 prize listing and without the alternate disclosure required by statute in violation of RCW
18 19.170.030(4). *See e.g.* Exhibit A.
19

20 5.10. On information and belief, Defendants made material representations in
21 advertisements to consumers that all prizes were readily available to be won when in fact certain
22 prizes were not available.

23 5.11. On information and belief, Defendants materially misrepresented the value of
24 prizes. *See e.g.* Exhibit A.
25
26

1 5.12. Defendants advertising practices related to prizes and promotions constitute unfair
2 and deceptive acts and practices in violation of RCW 19.70.030, RCW 19.86.020, and RCW
3 19.170.040.

4 5.13. Defendants advertising practices violate RCW 46.70.180(1) and constitute *per se*
5 violations of RCW 19.86.020 pursuant to RCW 19.70.010 and RCW 46.70.310.
6

7 **VI. THIRD CAUSE OF ACTION**
8 **(Simulated Check Violations)**

9 6.1. Plaintiff realleges paragraphs 1.1 through 1.3 and 2.1 through 2.4 and incorporates
10 them as if set fully herein.

11 6.2. From or about January 2005 to present, Defendants on numerous occasions caused
12 to be advertised, distributed or otherwise transferred a document that is not currency or a check or
13 other negotiable instruments, but has the visual characteristics of such. Hereinafter referred to as
14 “simulated check.” *See e.g.* Exhibit B.

15 6.3. The simulated checks included a dollar amount in both Arabic numerals and
16 written text. *See e.g.* Exhibit B.
17

18 6.4. The simulated checks included a signature line and stylized signature in the lower
19 right corner for approval. *See e.g.* Exhibit B.

20 6.5. The simulated checks included an amount payable in Arabic numerals in the upper
21 right corner of the document. *See e.g.* Exhibit B.

22 6.6. The simulated checks included the words “PAY TO THE ORDER OF” and
23 included a dollar amount in Arabic text.
24

25 6.7. The simulated checks did not include the words “THIS IS NOT A CHECK”
26 printed in diagonal across the check.



THIS IS YOUR PERSONAL INVITATION TO THE MAIN EVENT!

CURT WARNER CHEVROLET has teamed with an independent marketing firm to sell over 350 pre-owned vehicles during this Main Event. These vehicles will be sold regardless of profit or current market value. These are surplus vehicles from around the area: corporate program vehicles, lease returns, local trade-ins, and dealer surplus inventory. All of this inventory will be available for immediate delivery. THIS WEEK ONLY YOU ARE INVITED TO TAKE ADVANTAGE OF THE INCREDIBLE SAVINGS!! JUST PICK YOUR VEHICLE AND PICK YOUR PAYMENT!!

NO SPECIAL FINANCING AVAILABLE! TIL FEBRUARY 2006!

EVERY VEHICLE MUST BE SOLD!

LENDERS WILL BE AVAILABLE! DOUBLE YOUR DOWN PAYMENT! DELIVERS!

SO FUEL EFFICIENT VEHICLES TO CHOOSE FROM!

\$0 DOWN. \$109 PER MO.



0% apr financing available on a great selection. Buy today with zero down!

2003 FORD FOCUS



\$119

2005 TOYOTA COROLLA



\$249

2004 JEEP LIBERTY



\$389

2004 CHEVROLET SILVERADO 1500



\$399

5 DAYS ONLY

SAT, NOVEMBER 26TH, 9AM-9PM
SUN, NOVEMBER 27TH, 9AM-8PM
MON, NOVEMBER 28TH, 9AM-9PM
TUE, NOVEMBER 29TH, 9AM-9PM
WED, NOVEMBER 30TH, 9AM-9PM

**CURT WARNER CHEVROLET
10811 SOUTHEAST MILL BLVD · VANCOUVER
NO PHONE CALLS PLEASE**

CURT WARNER CHEVROLET HAS LEANED WITH A DIFFERENT MENTALITY TO A COMPLETELY NEW APPROACH TO THE MAIN EVENT!

This week only at CURT WARNER CHEVROLET, every vehicle will be drastically discounted to save you money! There will be over 350 pre-owned vehicles available at this event for you to choose from. Take advantage of this great buying opportunity and visit CURT WARNER CHEVROLET, November 26th through 30th!



TRUCKS

SUVS

CARS

WE WANT YOUR TRADE!
Used car buyers statewide will be on hand, offering you above market value!

SPECIAL LOW FINANCING!
We have made special arrangements with local & national Financial Centers to offer you the lowest possible rates!

\$0 DOWN \$109 PER MONTH



DON'T MISS OUT ON YOUR CHANCE TO WIN A 2003 CHEVROLET SUBURB!
IF YOUR KEY UNLOCKS IT, YOU DRIVE IT HOME!

SLOW CREDIT NO CREDIT BAD CREDIT DIVORCE BANKRUPTCY WE CAN HELP!

Customer Down Payment Bonus! \$3,000.00
THREE THOUSAND DOLLARS on 1/100 financing
CURT WARNER CHEVROLET

Mr. Curt Warner

2 WAYS TO WIN

#1 SCRATCH, MATCH & WIN

Scratch off the area to the left and match it to the prizes below. Every mail piece is a winner.

\$100 GAS CARD	GOLF UMBRELLA	\$1,000 BUY ONE GET ONE FREE	42" PLASMA TV

#2 WIN AN '00 CHEVROLET CAMARO



Use either this form or our website to enter your name.

YOU ARE PERSONALLY INVITED TO THE MAIN EVENT!

SAVE \$10,000 OFF CANADA RETAIL ON A 2001 FORD WINDSTAR!

5 DAYS ONLY CURT WARNER CHEVROLET
SAT, NOVEMBER 26TH, 9AM-9PM
SUN, NOVEMBER 27TH, 9AM-8PM
MON, NOVEMBER 28TH, 9AM-9PM
TUE, NOVEMBER 29TH, 9AM-9PM
WED, NOVEMBER 30TH, 9AM-9PM

10811 SOUTHEAST MILL BLVD - VANCOUVER
10701 HEATH ST - SEASIDE

*With approved credit on select models. Limit 2 vehicles per household. \$0 down and \$109 per month Example 2002 Kia Spectra (#14113-2): Sale price \$4,800. \$0 down, total amount financed \$4,800, \$109 a month for 60 months at 8.99% APR. Plus tax, title, license and fees. 2004 Chevrolet Silverado: (#93529) sp: \$20,114, \$399/mo for 60 mos @ 7.99% apr. \$1,000 down. 2003 Ford Focus: (#93558) sp: \$6,770, \$119/mo for 60 mos @ 7.99% apr. \$1,000 down. 2004 Jeep Liberty: (#93545) sp: \$19,300, \$389/mo for 60 mos @ 7.99% apr. \$1,000 down. 2005 Toyota Corolla: (#93476) sp: \$13,085, \$249/mo for 60 mos @ 7.99% apr. \$1,000 down. \$10,000 off NADA retail Example: 2001 Ford Windstar: (#93546) original price: \$19,995, sale price now: \$9,995. Negative equity on trade will be added to amount financed. Additional down payment may be required for approval. All sales subject to lenders final approval. Monthly payments depend on credit worthiness and vehicle chosen. Additional charges for February 2006 deferred payments with approved credit. Double your down payment maximum of \$2,000 not to be combined with any other offer. Example: customer down payment: \$2,000, dealership matches with discount of \$2,000. Only one prize per household. One discount per sale. Can not combine discounts and incentives. Free gas for one year with purchase of a used vehicle during this sale only based on 12,000 miles at 30 miles to a gallon. Value of \$1,000.00. Participants must be licensed drivers and 18 years of age or older to win. \$1,000 online shopping spree, customer is responsible for taxes and shipping. Estimated value of \$1,000. While supplies last. 2005 Chevrolet Cavalier (Stock #81726): Value of \$12,995. Winner responsible for TT&L. The individual with the winning key must attend the sale of the dealership listed in this advertisement and unlock the designated vehicle to win. The winner will assume any federal or state tax liability that may be incurred. Odds of winning the grand prize are 10,000:1. The dealership listed in this advertisement and its advertising agency is not responsible for typographical, printing or production errors or if more than one winning key is accidentally distributed. Only the legal addressee at the address on the mailing piece will be eligible for the prize award. The winning key must unlock the designated vehicle. Once the winner unlocks the designated vehicle the contest is null and void and no more keys will be permitted to try and unlock the vehicle. Dealership and marketing company are not responsible for the vehicle unlocking due to mechanical failure or by contestants forcing the key to unlock. Winner responsible for all taxes, license, transportation charges, and dealer prep fees. Void where prohibited. Employees of dealership, their affiliates and family members are not eligible. Copyright © 2005 by ACG.

CURT WARNER CHEVROLET has teamed with
the MAIN EVENT!



TRUCKS
SUVS
CARS

This week only at CURT WARNER CHEVROLET, every vehicle will be discounted to save you money! There will be over 219 pre-owned vehicles available for you to choose from. Take advantage of this great buying opportunity and visit CURT WARNER CHEVROLET, November 26th through 30th!

WE WANT YOUR TRADE!
 Used car buyers will be on hand, offering you above book trade in values!¹⁻⁴

SPECIAL LOW FINANCING!
 We have made arrangements with local & national Financial Centers to help get you into a car!⁽¹⁻³⁾

\$0 DOWN **\$109 PER MONTH**

SLOW CREDIT NO CREDIT DIVORCE BANKRUPTCY WE CAN HELP!

DON'T MISS OUT ON YOUR CHANCE TO WIN A 2005 CHEVROLET CAVALIER!
 IF YOUR KEY UNLOCKS IT, YOU DRIVE IT HOME!

5 DAYS ONLY CURT WARNER CHEVROLET
 SAT, NOVEMBER 26TH, 9AM-9PM
 SUN, NOVEMBER 27TH, 9AM-8PM
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10811 SOUTHEAST MILL PLAIN BLVD • VANCOUVER
NO PHONE CALLS PLEASE

20 WAYS TO WIN
#1 SCRATCH, MATCH & WIN!

Scratch off the area to the left and match it to the prizes below-Every mail piece is a winner!!!



WIN AN '05 CHEVROLET CAVALIER

ONE VEHICLE HAS BEEN CHOSEN AND IT COULD BE YOU!

YOU ARE PERSONALLY INVITED TO
The MAIN EVENT!
SAVE \$10,000!
OFF NADDA RETAIL!

ON A 2001 FORD WINDSTAR! (EXC)
AN AMERICAN REVOLUTION
SIMILAR SAVINGS ON A GREAT SELECTION OF PRE-OWNED VEHICLES!

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 SAT, NOVEMBER 26TH, 9AM-9PM
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10811 SOUTHEAST MILL PLAIN BLVD • VANCOUVER
NO PHONE CALLS PLEASE

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NO MONTHLY PAYMENTS TIL FEBRUARY 2006!^(b)

SPECIAL FINANCING AVAILABLE!

219 VEHICLES TO CHOOSE FROM!

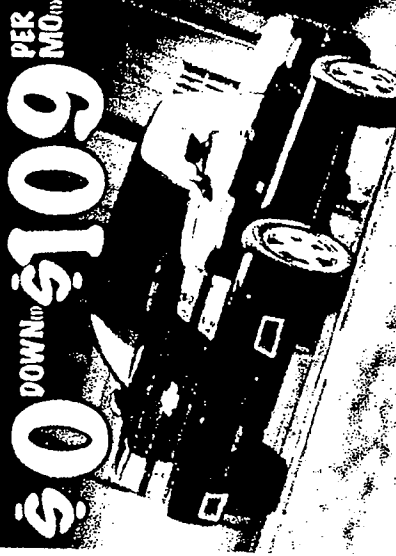
EVERY PURCHASE INCLUDES GAS FOR 1 YEAR!^(b)

LENDERS WILL BE AVAILABLE!

TEST DRIVE ANY VEHICLE!

SO DOWN DELIVERS!TM

FUEL EFFICIENT VEHICLES TO CHOOSE FROM!



\$0 DOWN **\$109 PER MO.**

0% apr financing available on a great selection! • Buy today with zero down!

2003 FORD FOCUS

\$119

2005 TOYOTA COROLLA

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2004 JEEP LIBERTY

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2004 CHEVROLET SILVERADO 1500

\$399

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CURT WARNER CHEVROLET
10811 SOUTHEAST MILL PLAIN BLVD • VANCOUVER
REvolution **NO PHONE CALLS PLEASE**

All financing subject to approval of credit on these select used models. (1) \$0 down and \$109 per month this 1 2002 Kia Spectra (#14113-2): Sale price \$4,800. \$0 down, \$109 a month for 60 months at 8.99% APR. Total deferred purchase price of \$6,540. Vin #s posted at dealership. (2) 2004 Chevrolet Silverado: (#93529) sp: \$20,114, \$399/mo for 60 mos @ 7.99% apr. \$1,000 down. (3) 2003 Ford Focus: (#93558) sp: \$6,770, \$119/mo for 60 mos @ 7.99% apr. \$1,000 down. (4) 2004 Jeep Liberty: (#93545) sp: \$19,300, \$389/mo for 60 mos @ 7.99% apr. \$1,000 down. (5) 2005 Toyota Corolla: (#93476) sp: \$13,085, \$249/mo for 60 mos @ 7.99% apr. \$1,000 down. (6) Interest accrues from day of signing. Negative equity on trade will be added to amount financed. Additional down payment may be required for approval. All sales subject to lenders final approval. Monthly payments depend on credit worthiness and vehicle chosen. Additional charges for February 2006 deferred payments with approved credit. (8) One year's worth of gas with purchase of a used vehicle during this sale only based on 12,000 miles at 30 miles to a gallon. retail value of \$1,000.00. (10) Based to current NADA book values. \$10,000 off NADA retail: 2001 Ford Windstar: (#93546) original price: \$19,995, dealer discount: \$10,000, sale price now: \$9,995. Vin # posted at dealership. (14) Discounts off Kelley Blue Book on used vehicles. Vin #s posted at dealership and all prices exclude tax, title, license and fees. Limit 2 vehicles per household. Only one prize per household. One discount per sale. Can not combine discounts and incentives. A dealer documentary service fee of up to \$35.00 may be added to the sale price. Employees of dealership, their affiliates and family members are not eligible. Expires 11/30/05. Copyright © 2005 by ACG.

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Auto Loan USA 

CURT WARNER CHEVY WELCOMES NATIONAL FLEET LIQUIDATORS & AUTO LOAN USA... OFFERING OVER

\$2 MILLION

IN INVENTORY & INDIRECT LENDING.

OUR LENDERS COMPETE FOR YOUR BUSINESS!!

VEHICLES AVAILABLE FROM THESE MANUFACTURERS

**FORD • GMC • TOYOTA • CHEVROLET • SUZUKI • JEEP • HYUNDAI
HONDA • NISSAN • CHRYSLER • DODGE • PONTIAC • KIA**

**PURCHASE A PRE-OWNED VEHICLE AT
UP TO 60% OFF IT'S ORIGINAL PRICE!!!**

YOU ARE APPROVED! *

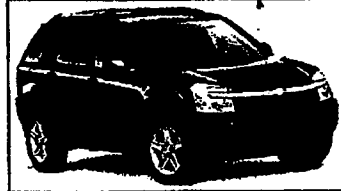
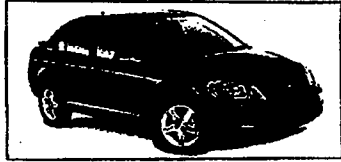
(YOU MUST BRING VOUCHER BELOW FOR IMMEDIATE FINANCING)

PROGRAM HEADQUARTERS
10811 SE Mill Plain Blvd.
Vancouver, WA 98664

POSTMASTER-TIME SENSITIVE! IN HOME BETWEEN 9/13/05 - 9/15/05

CONGRATULATIONS!

PRIME STD.
U.S. POSTAGE
PAID
GRAND RAPIDS, MI
PERMIT #1



**FINAL NOTIFICATION
YOU ARE THE**

GRAND PRIZE WINNER!

Your Vacation will be re-awarded after Saturday,
September 18 at 3:00 pm. You must have a valid photo ID.



**IMMEDIATE
RESPONSE REQUIRED!**

Grand prize is 7 day, 7 night vacation. Quantities limited. First come, first served. No purchase necessary.



CURT WARNER CHEVY INVITES YOU TO ATTEND

"REPROCESSED VEHICLE EVENT!"

**187 VEHICLES WILL BE SOLD
DIRECTLY TO THE PUBLIC FOR**

AS LOW AS

**\$79
MONTH****



CUSTOMER DISCOUNT BONUS

\$2,000

Curt Warner Chevy

AUTHORIZED SIGNATURE
NON-NEGOTIABLE • HAS NO CASH VALUE

PAY THE SUM OF: **TWO THOUSAND DOLLARS AND 00/100**

PAY TO THE ORDER OF: **CURT WARNER CHEVY**

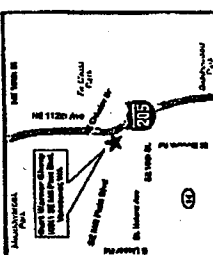
VOUCHER FULL AND VOID AFTER 6PM, 9/18/05.
VOUCHER VALID ONLY IF PRESENTED UPON REGISTRATION.
Non-negotiable. Void where prohibited. Voucher has no cash value. One number per used vehicle purchased. See dealer for details. This is not a rebate.

5 DAYS ONLY! WEDNESDAY THURSDAY FRIDAY SATURDAY SUNDAY
SEPTEMBER 14 SEPTEMBER 15 SEPTEMBER 16 SEPTEMBER 17 SEPTEMBER 18
9:00AM - 9:00PM 9:00AM - 9:00PM 9:00AM - 8:00PM 9:00AM - 8:00PM 10:00AM - 7:00PM

CURT WARNER CHEVY REVOLUTION

CALL 866-MY WARNER

AN AMERICAN
10811 S.E. MILL PLAIN BLVD.
VANCOUVER, WA • 360-892-0900



*We credit bonus of \$200 to "owner" of new vehicle. This vehicle must be purchased from Curt Warner Chevy. Voucher is valid only for new vehicles purchased from Curt Warner Chevy. Voucher is void where prohibited. Voucher has no cash value. One number per used vehicle purchased. See dealer for details. This is not a rebate.

YOU ARE INVITED TO ATTEND CURT WARNER CHEVROLET'S "PRIOR ASSET VEHICLE EVENT!"

**Vehicles may have been observed at auction

CURT WARNER CHEVROLET HAS VIRTUALLY EVERY MAKE AND MODEL AVAILABLE!

PONTIAC • GMC • TOYOTA • JEEP • CHEVROLET
FORD • HONDA • NISSAN • CHRYSLER • DODGE
MITSUBISHI • CADILLAC • LINCOLN • MAZDA • LEXUS

ALL USED VEHICLES SOLD FOR UP TO 90% OFF ORIGINAL MSRP PRICE!

(2) Limited quantity first come, first served. Example: 1993 Chevrolet S-10 Blazer 4X4 (5th #02802-1) Original MSRP: \$20,000. Sale Price: \$2,000 plus TT&L.

ALL VEHICLES SOLD AT INCREDIBLE SAVINGS



FOR ADDITIONAL SAVINGS CUSTOM-TAILORED
ESPECIALLY FOR YOU, PLEASE VISIT US AT

www.curtwarnerchevrolet.com

YOUR PLATINUM CREDIT RATING MAY EARN YOU A LINE OF CREDIT UP TO...

EVENT HEADQUARTERS
CURT WARNER CHEVROLET
10811 SE Mill Plain Blvd.
Vancouver, WA 98664

LOAN APPROVAL VOUCHER CERTIFICATE*
VALID THROUGH FEBRUARY 26, 2006

YOU MAY BE PRE-APPROVED THE AMOUNT UP TO
THIRTY-TWO THOUSAND-EIGHT HUNDRED SIXTY-FIVE DOLLARS AND 00/100

\$32,865 00.00 (1)

TO THE ORDER OF OUR VALUED CUSTOMER

NON-NEGOTIABLE
CERTIFICATE

Kim Kuorn

AUTHORIZED SIGNATURE

*Non-negotiable. One voucher per used vehicle purchased. Prior sales excluded. Cannot be combined with any other offer on this matter. Void where prohibited. Voucher has no cash value. See dealer for details. This is not a rebate. Maximum amount: With credit score of 720 or greater. Your new vehicle payment cannot exceed 20% of your gross monthly income; vehicle payment limited with your current monthly payments must not exceed 50% of your gross income. Must be at least 18 years of age. Any equity deficit in your current vehicle must be paid or refinanced with new vehicle. Bankruptcy must be discharged.

4 DAYS ONLY!
THURS FEB 23 9A-9P
FRI FEB 24 9A-9P
SAT FEB 25 9A-7P
SUN FEB 26 10A-6P

CURT WARNER CHEVROLET

10811 SE Mill Plain Blvd. • Vancouver, WA 98664

AN AMERICAN REVOLUTION

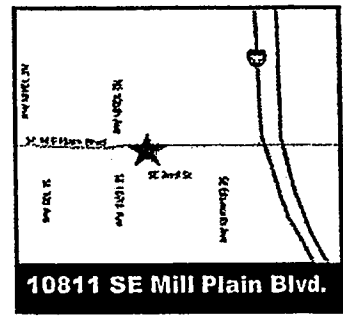


EXHIBIT C

2005	Curt Warr Chevrolet 10811 S.E. Mill Plain Blvd. Vancouver, WA 98687	Official Notification: No. 560993
		Approval Code: 604926900
		Maximum amount financed \$21,275
Dealer Code: 4425		This certificate serves as your notification of easy auto finance arrangements made especially to a very select group of individuals such as yourself. Past credit difficulties such as late payments, bankruptcy, and even repossession may not be a problem when you bring this certificate with you. This limited time offer is being made by the special Finance Department of the dealer listed in the form. With this certificate and qualifications listed below, you are automatically qualified for an auto loan of up to the amount in the form. Please present the enclosed purchase voucher at your appointment.
<Barcode> <Variable Full Name> <Variable Address> <Variable City, ST zip>	Maximum term length 72 Months	
This is not a government document		

Vehicle Purchase
Statement

2005

PRE-APPROVED* NOTICE

**DO NOT LOSE OR DISCARD THIS NOTICE
OFFERS EXPIRES 1/31/06**

You have been pre-approved* for an auto loan. Information contained in your credit bureau report, obtained from a consumer reporting agency was used in conjunction with selecting you for this offer.

The amount of the loan may vary. For security reasons, the approved amount is not listed. Just call our 24 hour / 7 days a week approval hotline 866-GO4-ACAR (866) 464-2227 loan specialist. Recite your dealer code listed below to find out what your approval* amount is.

Your pre-approval* is valid at Curt Warner Chevrolet (see below) who has agreed to mark down from it's list prices on all of their inventory to make as many vehicles available to you as possible.

This is a unique offer and we want you to take advantage of your pre-approved auto loan but you must come in on or before the date listed as this offer will expire. Come early for the best selection on over 100 vehicles.

TO DETERMINE YOUR PRE-APPROVAL* AMOUNT:

Step 1. Call the Auto Approval # at 1-866-GO4-ACAR (866) 464-2227.

Step 2. Tell your loan specialist your personal Dealer Code #4425

Step 3. Present this letter upon entering the dealership listed below. (Note: Be prepared to accept immediate delivery of your new or used vehicle.) Please call your Loan Specialist to schedule an appointment.

Curt Warner Chevrolet

10811 S.E. Mill Plain Blvd • Vancouver, WA 98687 • 866-GO4-ACAR (866)464-2227

You can choose to stop receiving "prescreened" offers of credit from this and other companies by calling toll free 1-888-567-8688. See PRESCREEN & OPT-OUT NOTICE on back for more information about prescreened offers.

PRESCREEN & OPT-OUT NOTICE: This "prescreened" offer of credit is based on information obtained from a consumer credit reporting agency. You received this offer because you satisfied certain pre-established criteria for creditworthiness. This offer may not be extended if, after responding to this offer, you do not meet the criteria used in the initial selection process or you do not furnish the required collateral. If you do not want to receive prescreened offers of credit from this or any other companies, call toll free 1-888-567-8688, Equifax Options, P.O. Box 740123 Atlanta, GA 30374, Experian Information Systems, Inc., P.O. Box 919, Allen, TX 75013, Trans Union LLC, P.O. Box 97328, Jackson, MS 39288 or by calling 1-888-5OPTOUT.

Motor Vehicle Division
3500 N. Hullen
Metairie, LA 70002

POSTMASTER-TIME SENSITIVE MATERIAL. IN HOME DATE: 02/18/06

PSRST STD
E-COVERS
U.S. POSTAGE
PAID
TAMPA, FL
PERMIT #245

Congratulations

**YOU ARE THE
GRAND PRIZE
WINNER!**

MUST REDEEM PRIZE ON SALE DATES DURING EVENT HOURS

\$1 Grand prize is 3 day/2 night vacation. This program provides you and your family accommodations, meals, drinks & parking per vacation package, at your choice of one of the destinations listed in Award #2006-00000. Offer not redeemable for more than one lot, taxes, and processing fee of \$25.00. Retail value of \$750.00. No purchase necessary.

**YOU ARE INVITED TO ATTEND
CURT WARNER CHEVROLET'S
PRIOR ASSET VEHICLE EVENT!**

**290 VEHICLES WILL BE
SOLD DIRECT TO THE PUBLIC FOR**

**STARTING
AT:**

\$55

PER MONTH



BRING IN THIS MAILER AND RECEIVE

\$10,000 OFF MSRP

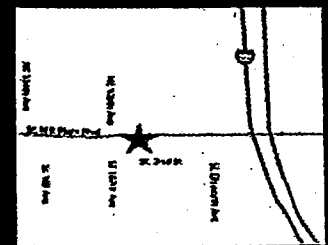


\$4000 off 2004 Chevrolet Monte Carlo, Trailblazer and Impala in stock. After any applicable state(s). Dealer installed options only.

4 DAYS ONLY!

THURS FEB 23 9A-9P	FRI FEB 24 9A-9P	SAT FEB 25 9A-7P	SUN FEB 26 10A-6P
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CURT WARNER CHEVROLET
10811 SE Mill Plain Blvd. • Vancouver, WA 98664
 **AN AMERICAN R VOLUTION**



10811 SE Mill Plain Blvd.

EXHIBIT D

113000318