



Kia Motors America, Inc.

Corporate Headquarters

111 Peters Canyon Road

Irvine, CA [REDACTED] USA

T [REDACTED] F 1 [REDACTED]

July 9, 2015

[REDACTED]

This letter is being written pursuant to your request for assistance from Kia Motors America (KMA). KMA takes such matters seriously and strives to achieve the highest levels of customer satisfaction. After reviewing the history for your client's 2013 Kia Soul (VIN: [REDACTED]) we would like to make the following offer to replace or repurchase your client's vehicle. Should your client choose option #1 or option #2, please be advised that Kia will also pay Attorney fees in the amount of \$1,750.00. All options will require a signed settlement release agreement. Please review these options:

Option #1:

Replacement of vehicle with a comparable Kia vehicle. We propose to accomplish this via a "Substitution of Collateral" transaction with your current lien holder, whereby we would replace the current collateral on your loan with a mutually agreeable brand new Kia vehicle. All other terms and conditions of the underlying loan would remain the same. Of course, the accomplishment of this transaction would be contingent upon approval by your lien holder. Kia Motors America, Inc. would pay the license and registrations fees for the new vehicle. Should you decide to upgrade to a more expensive Kia vehicle, you would be responsible for the upgrade charge and the sales tax associated with the upgrade.

Option #2:

Repurchase of your current Kia vehicle

Purchase Price	\$ 17,054.00 **	<i>subject to verification</i>
Sales Tax	1,039.05	
Doc Fee	143.00	
Government Fees	131.00	
<u>Less</u> Mileage deduction (based on 39,000 miles)	<5,542.55>	

Total Settlement Amount for Option #2

\$ 12,824.50*

*Any outstanding vehicle liens will be paid from this amount. If the total settlement amount is not sufficient to pay off the outstanding lien on the vehicle, you will be responsible to provide a cashier's check payable to Kia Motors America, Inc., in the amount of any deficiency at the time of vehicle turn-in. You may be entitled to a refund for any unused portion of an extended service contract, if applicable.

Please indicate your acceptance of one of the above offers by signing this letter where indicated below and returning it via fax [REDACTED], so that we may begin processing your request.

Please allow 45-60 days for completion of this process. Thank you for your courtesy and cooperation.

This offer is valid through 7/23/2015

Sincerely,

[REDACTED]

OPTION # ____ AS STATED HEREIN.

[REDACTED]



K2942738





K2942738



K2942738





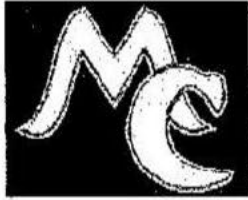
K2942738



K2942738



K2042738



**LAW OFFICES OF
MALONEY & CAMPOLO**
FACSIMILE TRANSMITTAL SHEET

[REDACTED]

[REDACTED]

information that is legally privileged. The information is intended solely for the use of the recipient named above. If you receive this transmission in error, please notify us by telephone immediately to arrange for the return of the document to our office. You are notified that any disclosures, reproduction or distribution for the taking of any action in reliance on the contents of this facsimile information is strictly prohibited. Thank you for your cooperation.

If you do not receive the above mentioned pages, or if you have any trouble with the transmission, please call [REDACTED].



Kia Motors America, Inc.

Corporate Headquarters

111 Peters Canyon Road

Irvine, CA 92606-1790 USA

T [REDACTED] F [REDACTED]

July 30, 2015

Law Offices of Maloney & Campolo, LLP

Tim Maloney

926 S. Alamo

San Antonio, TX [REDACTED]

Via email: [REDACTED]

This letter is being written pursuant to your request for assistance from Kia Motors America (KMA). KMA takes such matters seriously and strives to achieve the highest levels of customer satisfaction. After reviewing the service history for your client's 2013 Kia Soul (VIN: [REDACTED]) [REDACTED] would like to make the following offer to replace or repurchase your client's vehicle. Should your client choose option #1 or option #2, please be advised that Kia will also pay Attorney fees in the amount of \$1,750.00. All options will require a signed settlement release agreement. Please review these options:

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Option #2:

Repurchase of your current Kia vehicle

Purchase Price	\$ 17,054.00 **	subject to verification
Sales Tax	1,039.05	
Doc Fee	143.00	
Government Fees	44.00	
Administration Fee	131.00	
Less Mileage deduction (based on 39,000 miles)	<5,542.55>	

Total Settlement Amount for Option #2

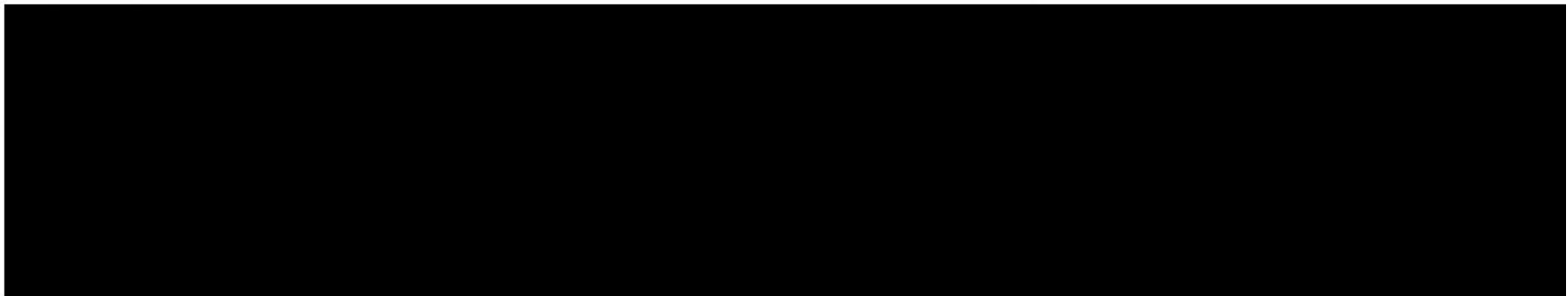
\$ 12,824.50*

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Please indicate your acceptance of one of the above offers by signing this letter where indicated below and returning it via fax [REDACTED], so that we may begin processing your request.

Please allow 45-60 days for completion of this process. Thank you for your courtesy and cooperation.

This offer is valid through 8/11/2015





RELEASE OF TITLE

TO: Capital One Auto Finance

Loan No.: [REDACTED]

Customer: [REDACTED]

VIN: [REDACTED]

Year/Model: 2013 Kia Soul

THE UNDERSIGNED HEREBY AUTHORIZES AND DIRECTS YOU TO SURRENDER TO KIA MOTORS AMERICA, INC., OR ORDER, THE PROPERLY-ENDORSED CERTIFICATE OF OWNERSHIP TO THE ABOVE-DESCRIBED VEHICLE. THE CERTIFICATE OF OWNERSHIP, PROPERLY ENDORSED, MUST BE MAILED TO:

Name, National Consumer Affairs
Kia Motors America, Inc.
111 Peters Canyon Road
[REDACTED]

SUBSTITUTION OF COLLATERAL AGREEMENT

CAPITAL ONE AUTO FINANCE ("Creditor") is the assignee of an installment sales contract by [REDACTED] ("Seller") on the contract [REDACTED]

Creditor [REDACTED] vehicle [REDACTED] ("Substitute Collateral") for the Original [REDACTED]

In consideration of Creditor's agreement, Buyer agrees to and does hereby grant a first lien security interest under the Uniform Commercial Code and any other applicable laws or regulations in the Substitute Collateral to Creditor to secure Buyer's performance under the terms and conditions of the Contract until Buyer has paid all amounts due under the Contract. The security interest is to the same extent as described in the Contract. Buyer and Creditor understand and agree that all terms and conditions of the Contract shall continue in full force and effect, except that the obligations of Buyer and the rights and remedies of Creditor contained therein with respect to the Original Collateral shall apply to the Substitute Collateral as if the Substitute Collateral were originally the subject of the Contract. Buyer will take whatever actions are necessary, including but not limited to those actions reasonably requested by Creditor and Seller, to ensure that Creditor's first lien in the Substitute Collateral is perfected.

CONSENT OF GUARANTOR(S)

The undersigned, guarantor(s) of the Contract, consent to the foregoing substitution and agree that such substitution shall not release, alter or in any manner affect the [REDACTED]

CONSENT OF CAPITAL ONE AUTO FINANCE

Subject to all of the foregoing terms and conditions, CAPITAL ONE AUTO FINANCE hereby consents to the foregoing substitution.

By _____

([REDACTED])

VEHICLE/VESSEL TRANSFER AND REASSIGNMENT FORM

This form is not the ownership certificate. It must accompany the titling document or application for a duplicate title.

INSTRUCTIONS ON REVERSE SIDE ALL SIGNATURES MUST BE IN INK PHOTOCOPIES NOT ACCEPTED

Vehicle/Vessel ID

Bill of Sale

Odometer

Buyer

Seller

Power of Attorney

SECTION 1: Vehicle/Vessel Description

IDENTIFICATION NUMBER

YEAR MODEL

MAKE

LICENSE PLATE/CF #

MOTORCYCLE ENGINE #

[Redacted]

above vehicle/vessel

\$

(SELLING PRICE)

\$

(GIFT VALUE)

If this was a gift, indicate relationship: _____ (e.g., parents, spouse, friend, etc.)

SECTION 3: Odometer Disclosure Statement (Void if Mileage is Altered or Erased)

Federal and State Law requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

The odometer now reads (no tenths) miles, and to the best of my knowledge reflects the actual mileage **unless one of the following statements is checked.**

WARNING—ODOMETER DISCREPANCY

☐ Odometer reading is NOT the actual mileage

☐ Mileage exceeds the odometer mechanical limits

Explain odometer discrepancy: _____

SECTION 4: Buyer and Seller (MUST print his or her name, date and sign this section.)

BUYER

I acknowledge the odometer reading and the facts of the transfer. I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

PRINT NAME <i>Kia Motors America, Inc.</i>	SIGNATURE <i>X</i>	DATE	DL, ID OR DEALER #
PRINT NAME	SIGNATURE <i>X</i>	DATE	DL, ID OR DEALER #
PRINT NAME	SIGNATURE <i>X</i>	DATE	DL, ID OR DEALER #
MAILING ADDRESS	CITY	STATE	ZIP DAYTIME PHONE #

SELLER

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

PRINT NAME [Redacted]	SIGNATURE [Redacted]	DATE	DL, ID OR DEALER #
PRINT NAME	SIGNATURE <i>X</i>	DATE	DL, ID OR DEALER #
PRINT NAME	SIGNATURE <i>X</i>	DATE	DL, ID OR DEALER #
MAILING ADDRESS	CITY	STATE	ZIP DAYTIME PHONE #

SECTION 5: Power of Attorney

[Redacted]

X

VEHICLE/VESSEL TRANSFER AND REASSIGNMENT FORM INSTRUCTIONS

THIS FORM IS NOT THE OWNERSHIP CERTIFICATE. IT MUST ACCOMPANY THE TITLE OR APPLICATION FOR A DUPLICATE TITLE. PHOTOCOPIES OF THE FORM MAY BE RETAINED FOR YOUR RECORDS.

SECTION 1 — Vehicle/Vessel Identification

This section must be completed.

SECTION 2 — Bill of Sale

To be completed by the seller of the vehicle/vessel, identifying the buyer and/or gift recipient, the purchase price or gift value, and date of sale and/or gift.

SECTION 3 — Odometer Disclosure Statement

To be completed by the seller disclosing the mileage at the time of sale. Any alteration (write-over, cross-out, erasure, deletion, etc.), made to the reported mileage will VOID the odometer disclosure section of this document and a new odometer statement (including the signature of both parties) is mandatory. Photocopies may be retained for personal record. Dealers and Auto auctions are required to retain a photocopy of the odometer disclosure for 5 years.

Federal law requires the hand printed name, date and signature of the buyer and seller when disclosing and acknowledging the odometer reading.

SECTION 4 — Buyer/Seller Information (Individual[s], Company, Dealership, Lessor/Lessee or Trust)

To be completed by the buyer to provide name and address, accept the responsibility of ownership, and/or acknowledge mileage reported.

To be completed by the seller to provide name and address, release ownership, and/or disclose mileage to the buyer.

SECTION 5 — Power of Attorney

To be completed when appointing a person or company to act as an attorney-in-fact, to sign papers and documents that may be necessary in order to secure California registration of or to transfer my/our interest in the identified vehicle or vessel.

The odometer disclosure statement cannot be completed by power of attorney.

INSTRUCCIONES PARA COMPLETAR ESTE FORMULARIO

ESTE FORMULARIO NO ES EL CERTIFICADO DE PROPIEDAD.

ÉSTE DEBERÁ ACOMPAÑAR AL TÍTULO O LA SOLICITUD PARA DUPLICADO DE TÍTULO. PUEDE GUARDAR FOTOCOPIAS DE ESTE FORMULARIO PARA SU ARCHIVO PERSONAL.

SECCIÓN 1 — Identificación de Vehículo/Barco

Esta sección deberá completarse.

SECCIÓN 2 — Factura de Venta

Para completarse por el vendedor del vehículo/barco, para identificar al comprador y/o receptor del regalo, el precio de compra o valor del regalo y la fecha de la venta y/o regalo.

SECCIÓN 3 — Declaración del Recorrido en Millas del Odómetro

Para completarse por el vendedor revelando el millaje al momento de la venta. Cualquier alteración (escribir sobre el texto, cruzar texto, borraduras, omisiones, etc.) que se haga al millaje reportado ANULARÁ la sección de la revelación del odómetro de este documento y será obligatorio presentar una nueva declaración (incluyendo la firma de ambas partes). Puede conservar fotocopias para su archivo personal. A los concesionarios y subastas de autos se les exige conservar una fotocopia de la revelación del odómetro por cinco (5) años.

La ley federal exige los nombres escritos a mano, así como las firmas del comprador y el vendedor y la fecha al revelar y reconocer la lectura del odómetro.

SECCIÓN 4 — Información sobre el Comprador/Vendedor (Individuo[s], Compañía, Concesionario, Arrendatario/Arrendador, o Fideicomiso)

El comprador deberá llenar esta sección a fin de proveer su nombre y dirección, aceptar responsabilidad del vehículo/barco, y/o reconocer el millaje reportado.

El vendedor deberá llenar esta sección a fin de proveer su nombre y dirección, relevar la responsabilidad del vehículo/barco, y/o revelar el millaje al comprador.

SECCIÓN 5 — Poder Legal

Esta sección deberá llenarse cuando se asigna una persona o compañía para actuar como apoderado para firmar papeles y documentos que pueden ser necesarios para asegurar la matrícula de California, o para traspasar mi/nuestro interés en el vehículo o barco identificado.

Esta sección de poder legal no puede usarse para la revelación del odómetro.

Memorandum
Invoice

KIA MOTORS AMERICA

SOUTHERN REGION 100 GALLERIA PARKWAY SUITE 1550 ATLANTA GA

DEALER NAME AND ADDRESS

INVOICE DATE

INVOICE NO

DEALER COST

\$16,639.00

\$98.00

\$42.00

DMG CONTRIBUTION

\$168.00

SUBTOTAL

\$17,360.00

\$16,947.00

OTHER CHARGES

INLAND FREIGHT & HANDLING

\$825.00

\$825.00

TOTAL

\$18,185.00

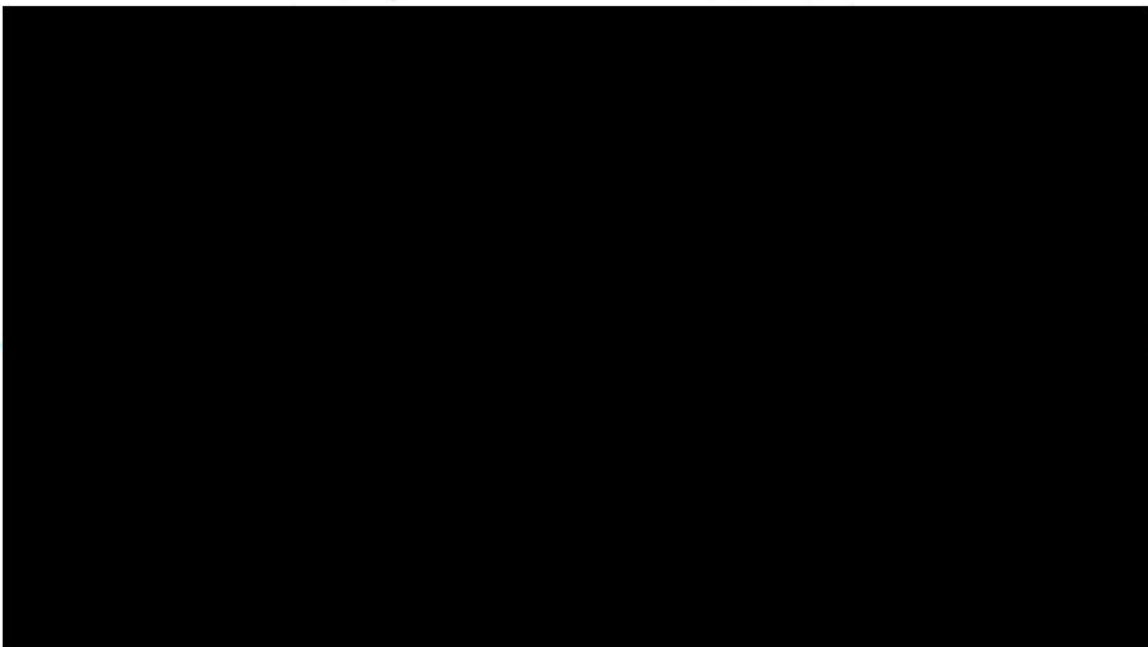
\$17,772.00

ATTENTION:

DEALER/FINANCING BANK - FOR REFERENCE
PURPOSES, PLEASE REFER TO ACH/DTC

MEMORANDUM INFORMATION ONLY
THIS DOCUMENT DOES NOT TRANSFER TITLE

ORIGINAL



K2942738

Mileage

Owner's Name

Review this worksheet with owner at delivery, especially the features that are shaded. Provide with all remaining copies to the purchaser.

Customer

Inspect vehicle as if you were purchasing it. CHECK the following items:

- | | |
|--|--|
| ☐ Wash and clean vehicle interior & exterior | ☐ Check TPMS system—adjust tire pressure as necessary |
| ☐ Verify completion of PDI & In-Stock Vehicle Maintenance Record | ☐ Inspect under hood, door jambs, trunk for cleanliness |
| ☐ Inspect interior carpets, headliner, cup holders, & console for cleanliness | ☐ Inspect exterior for dirt, scratches, dents & dings |
| | ☐ Confirm "Good Battery" using the Kia battery tester |

1. Documentation – Steps 1-6 with Customer

- | | |
|---|--|
| ☐ Explain the Kia Pre-Delivery Inspection process | ☐ Review Owner's Manual |
| ☐ Review Features & Functions Guide (FFG) | ☐ Review Warranty & Consumer Information manual |
| ☐ Review, sign, date, and detach Vehicle Delivery Checklist in Features & Functions Guide (FFG) and place in "Deal Jacket" | ☐ Review Tire Warranty booklet |
| | ☐ Review Consumer Information brochures (Fuel Economy and TPMS) |

2. Maintenance Requirements to Validate Warranty

- | | |
|---|---|
| ☐ Review recommended maintenance schedule in Owner's Manual | ☐ Review service visit log section of Warranty & Consumer Information manual |
| ☐ Explain time and/or mileage service intervals—whichever occurs 1st | ☐ Explain importance of service record retention to update scheduled maintenance |

3. CUSTOMER 360° Parts and Service Orientation

- | | |
|---|--|
| ☐ Schedule first vehicle service appointment NOTE: If either the Parts or Service Departments are closed, please provide the appropriate business cards | |
| ☐ Tour areas, introduce staff & explain value of Kia parts & service | ☐ Review hours & Customer 360° Service Experience |

4. Vehicle Orientation – Review ALL items below. Particular attention should be given to items that are shaded

Use the **Features & Functions Guide**; Explain the location and operation of the following items (if equipped):

Under Hood

- ☐ Check fluid levels
- ☐ Fuse panels
- ☐ Battery cover

Driver's Side / Interior

- ☐ Remote key & lock operation
- ☐ Remote start / Push button start (Accessory Mode)
- ☐ Seat & headrest adjustments
- ☐ Seat warmers / coolers (ventilated)
- ☐ Pedal adjustments
- ☐ Power windows, locks & mirrors
- ☐ AWD and AWD LOCK
- ☐ ISG (Idle, Stop, Go) System
- ☐ Electronic Stability Control (ESC)
- ☐ Downhill Brake Control (DBC)
- ☐ Hill-start Assist Control (HAC)
- ☐ Exterior & interior light controls
- ☐ Advanced lighting speaker (mood)
- ☐ Steering wheel controls (**Bluetooth®** & Heating)
- ☐ Gauges, meters & odometer
- ☐ Trip Button (Set "Distance to Service" mode)
- ☐ Fuel Economy (ECOMINDER® / Active ECO) indicator
- ☐ Tire Pressure Monitoring System (TPMS) / proper air pressure / Interference issues
- ☐ Front and rear wipers / washers
- ☐ Rear view mirror dimming function
- ☐ Homelink

- ☐ Clock
- ☐ Audio system & radio presets
- ☐ SiriusXM Satellite Radio
 - ☐ General operation
 - ☐ Antenna
 - ☐ Presets
 - ☐ Subscription & Renewal
 - ☐ Traffic for Navigational Units
- ☐ Bluetooth® system
 - ☐ Pairing phone
 - ☐ Making / receiving calls
 - ☐ Changing language
 - ☐ Phone book
 - ☐ Voice Set-Up/Speaker Adaptation
- ☐ UVO System
 - ☐ Voice Recognition
 - ☐ My Jukebox
 - ☐ Commands
 - ☐ Streaming Audio/Text
- ☐ HD Radio
- ☐ Navigation system
- ☐ Rear parking assist / Rear view camera
- ☐ AUX / USB / iPod® port / applicable cables
- ☐ Climate Control / Defrosters – button locations
- ☐ Power outlets
- ☐ Consoles – center and overhead
- ☐ Sunshade / sunroof control lever (2 detent positions)
- ☐ Power folding mirror switch (to synch)
- ☐ Automatic transmission
 - ☐ Adaptive Shift
 - ☐ Sportmatic
 - ☐ Learning
 - ☐ Paddle shifters
- ☐ Motor Driven Power Steering
- ☐ Cruise control
- ☐ Manual transmission (shift sequence & procedure)
- ☐ Air bags & Occupant Detection System (ODS) indicator

Rear Seat / Interior

- ☐ Child locks, LATCH
- ☐ Cup holders, armrest
- ☐ Rear climate control operation
- ☐ Seat Operation – 2nd Row / 3rd Row
- ☐ Rear seat entertainment system (RSE)

Trunk / Exterior

- ☐ Key & fob control
- ☐ Seat fold down releases
- ☐ Trunk lid / fuel door emergency release
- ☐ Tire Mobility Kit / Spare tire & tools
- ☐ Trailer hitch
- ☐ Wheel Lock key
- ☐ Fuel filler door & cap operation
- ☐ Tailgate / trunk operation

Hybrid

- ☐ Virtual Engine Sound System (VESS)
- ☐ Unique gauges on instrument panel / Navigation screen
- ☐ Unique safety precautions:
 - ☐ Orange high-voltage cables, wires, connectors
 - ☐ No liquids near hybrid-battery intake
 - ☐ Secure large/heavy loads in trunk
- ☐ Emergency trunk release location
- ☐ Location of 12V battery and 270V high-voltage hybrid battery
- ☐ Regenerative braking -- sound and feel

5. KIA Delivery First Pledge Review

- ☐ Your vehicle is spotlessly clean
- ☐ Vehicle functions were fully explained
- ☐ Your vehicle doesn't have any dents, dings or scratches

6. Customer Satisfaction Phone Survey

- ☐ Confirm time and best phone number for initial dealer follow-up
- ☐ Explain the customer satisfaction phone survey program regarding the

RETAIL INCENTIVE CLAIM FORM

BUYER INFORMATION

FIRST NAME

MIDDLE INITIAL

LAST NAME

SERVICE LLOYDS INSURANCE COMPANY

P.O. Box 26800, Austin, Texas 78755-0800 (512) 342-0600

PRODUCER NO.

POLICY NUMBER

TX 2 4

DEAL NUMBER

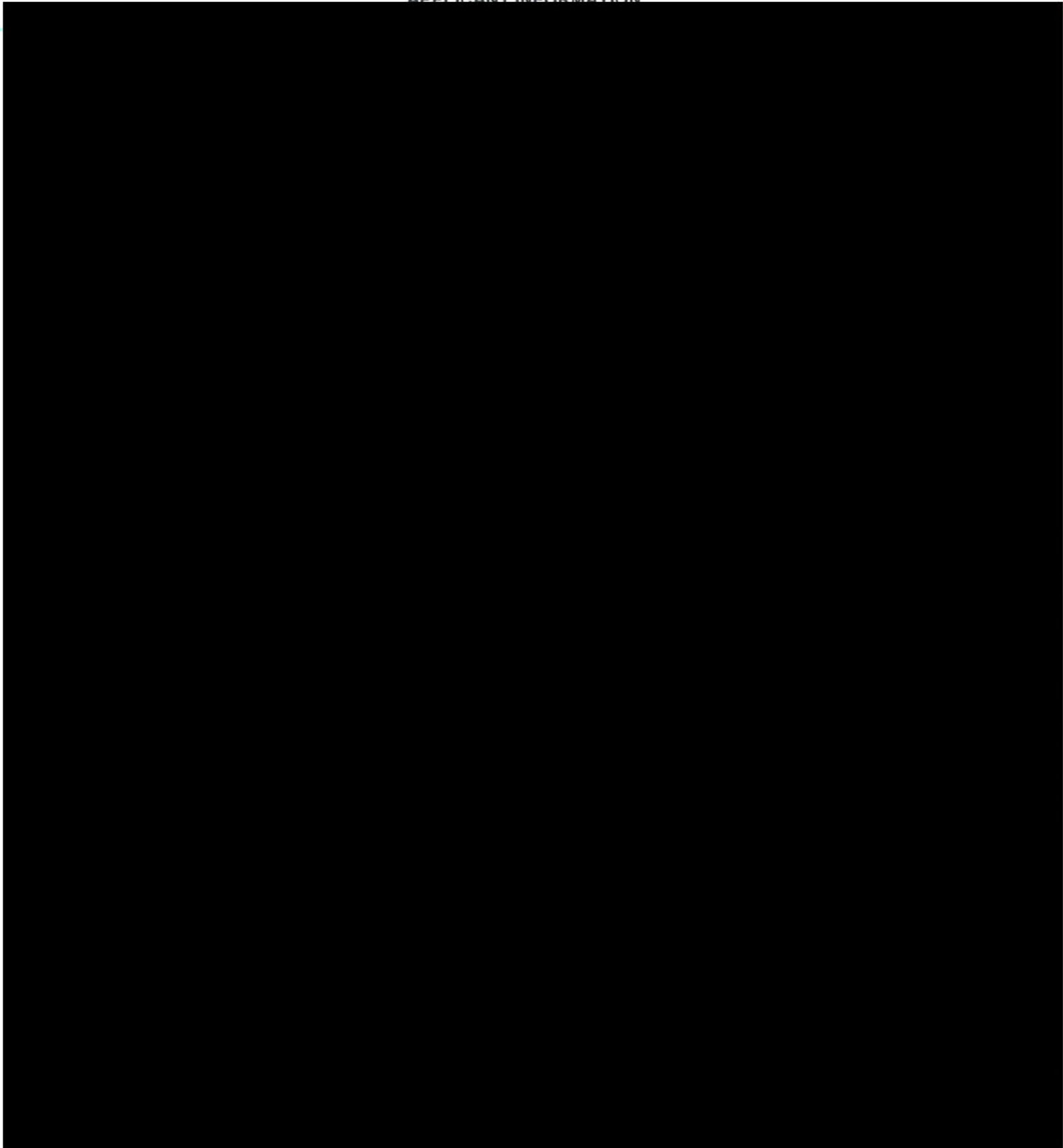
GAP APPLICATION AND DECLARATIONS PAGE

Disclosure of Guaranty Fund Non-Participation

In the event the insurer is unable to fulfill its contractual obligation under this policy or contract or application or certificate or evidence of coverage, the policyholder or certificate holder is not protected by an insurance guaranty fund or other solvency protection arrangement.

☒ Retail - Purchase ☐ Retail - Balloon ☐ Lease

APPLICANT INFORMATION



ANCIRA

MOTOR VEHICLE PURCHASE ORDER

DEAL
NUMBER 40674

CLOSURE STATEMENT

requires that you state the mileage upon transfer of

KIA VEHICLE TRADEOUT AUTHORIZATION

CUSTOMER: _____

DISTRICT: _____

DEALER CODE: _____

REPLACEMENT VEHICLE VIN: KNDJN2A25G 40

REPLACEMENT VEHICLE COSTS	
Dealer Invoice Price	\$ 17,772.00
PLUS: Dealer Doc Fees	\$ 143.00
PLUS: License Fees (Temp tag)	\$ 148.50
PLUS: Sales Tax on: (a) \$ _____ OR (b) No sales tax is due (see attached certificate)	(a) \$ OR (b)
PLUS: Safety inspection, deputy fee, anti-theft	\$ 182.75
PLUS: Title Fee, <i>GAP?</i>	\$ 484.84
SUBTOTAL	\$ 18,731.00
LESS: Customer Rebate (As Applicable)	< \$ 500.00
LESS: Owner Loyalty (As Applicable)	< \$ 0.00
LESS: Holdback (As Applicable)	< \$ 522.00
LESS: Customer Contribution (if paid to dealer)	< \$
LESS: NEW LOAN TO BE FUNDED	< \$
LESS:	< \$
LESS: Other (i.e., Test Drive Incentive) (As Applicable)	< \$
TOTAL NEW VEHICLE COST:	\$ 18,293.50 <i>+ Rental 17</i>

Fwd:
From:
Sent:
To:
Cc:

Sent from my iPhone

Begin

Fr
Da
To
Su

He
W

We are currently pending the below documents from Manufacturer/dealer showing the updated Replacement VIN of 2016 KIA SO

- Letter from Manufacturer
- Copy of the manufacturer'
- Documents can be faxed

Thanks!

believers and the thinkers, but most of all,
thin you, even when you don't see it yourself."

proprietary to Capital One and/or its affiliates and may only be used solely in performance of work or services for Capital One. The information transmitted herewith is intended only for use by the individual or entity to which it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any review, retransmission, dissemination, distribution, copying or other use of, or taking of any action in reliance upon this information is strictly prohibited. If you have received this communication in error, please contact the sender and delete the material from your computer.



Rental Company:

ENTERPRISE RENT-A-CAR

Invoice:

D [REDACTED] 3-5221

Alternate Invoice Number: 1WTW0N

Bill To: K15221

RENTAL DETAILS

(ys)

(s)

Amount

2,648.25

\$129.69

\$173.62

2,951.56

\$0.00

2,951.56

Rental Invoice

Please Return This Portion with Remittance

Make Payment To:**ENTERPRISE RENT-A-CAR (5299)**
1505 HARRY WURZBACH

SAN ANTONIO, TX [REDACTED]

Federal ID: [REDACTED]

Total Charges:

\$2,951.56

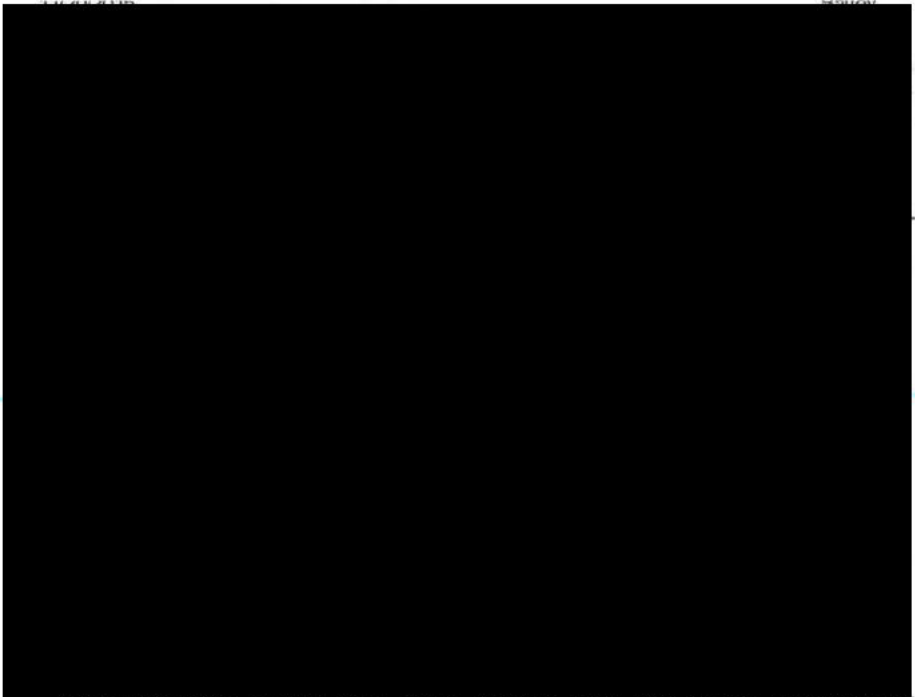
Less Amount Received:

\$0.00

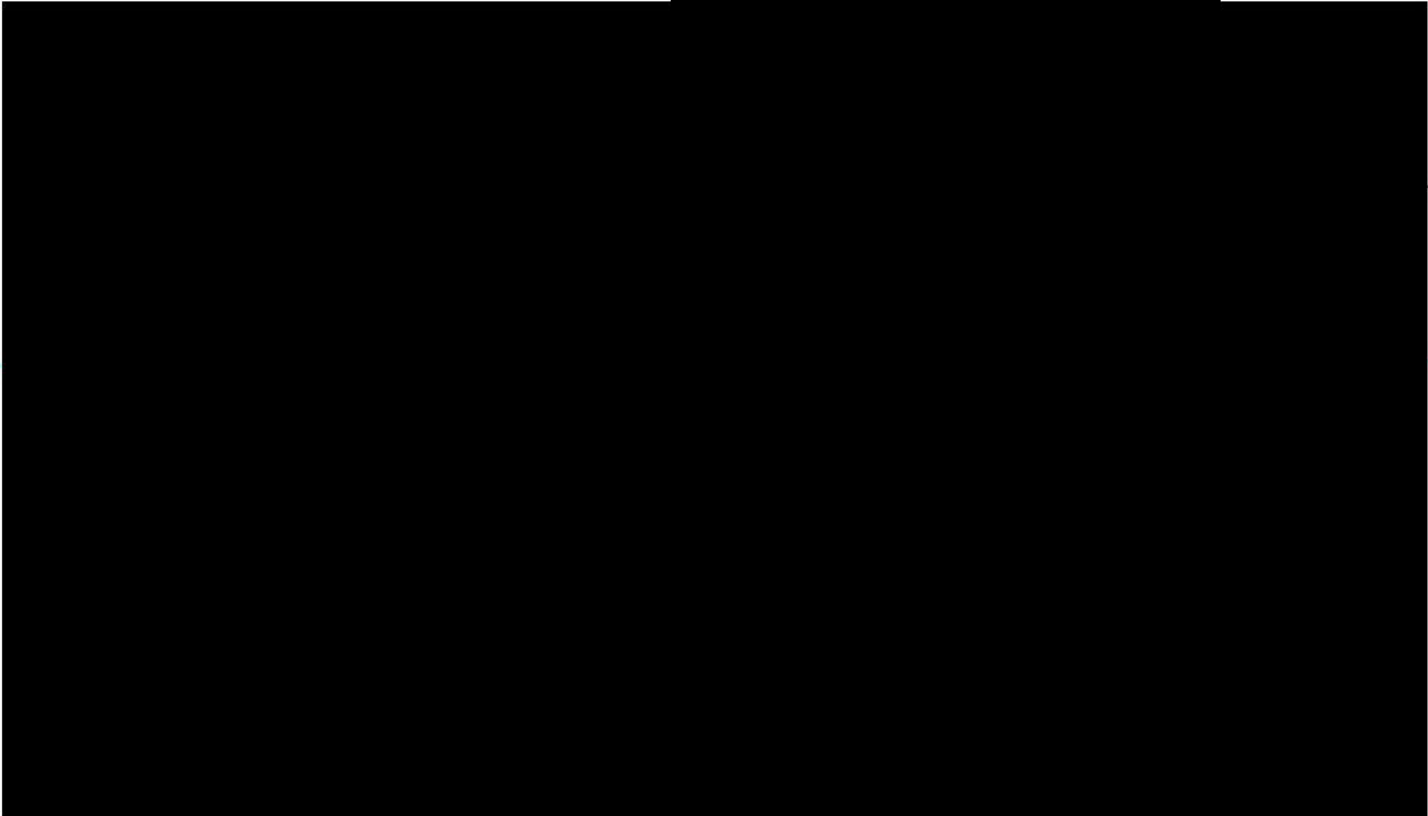
Total Amount Due.....**\$2,951.56**

Please include on your check:

Invoice: D [REDACTED]



CONFIDENTIALITY NOTICE: This e-mail and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed and may contain confidential and privileged information protected by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of the e-mail is strictly prohibited. Please notify the sender immediately by return e-mail and delete all copies from your system.





Rental Company:

ENTERPRISE RENT-A-CAR

Invoice:

D [REDACTED] 3-5221

Alternate Invoice Number:

1WTW0N

Amount

8.25

9.69

1.62

.56

.00

.56

323.⁴¹
3275.¹⁷

Rental Invoice

Please Return This Portion with Remittance

Make Payment To:
ENTERPRISE RENT-A-CAR (5299)
1505 HARRY WURZBACH

SAN ANTONIO, TX [REDACTED]

Federal ID: [REDACTED]

Total Charges:

\$2,951.56

Less Amount Received:

\$0.00

Total Amount Due.....**\$2,951.56**

Please include on your check:

Invoice: D [REDACTED]

Date: 12/3/2015

Comments:

The dealership will need to have the customer sign this document and overnight to Special Ops. The package should include the following:

- **Original** Substitution of Collateral Form
- Gap form updated w/ new VIN (if applicable)
- Service Contract form updated w/ new VIN (if applicable)

We will need the original signed SUBSTITUTION OF COLLATERAL AGREEMENT form sent directly to Special Operations at the following address:

Capital One Auto Finance
Attention: Special Operations
8058 Dominion Parkway
Plano, Texas

Thank you,
Special Operations
8058 Dominion Parkway
Plano, TX
1- fax





The Power to Surprise

KIA MOTORS AMERICA, INC.

Western Region

111 Peters Canyon Road

Irvine, CA

TEL:

FAX:

Fax

To:

Company:

Fax:

Phone:

Pages:

16 total

Re:

Acct# 797

CC:

☐ Urgent

☐ For Review

☐ Please Comment

☒ Please Reply

☐ Please Recycle

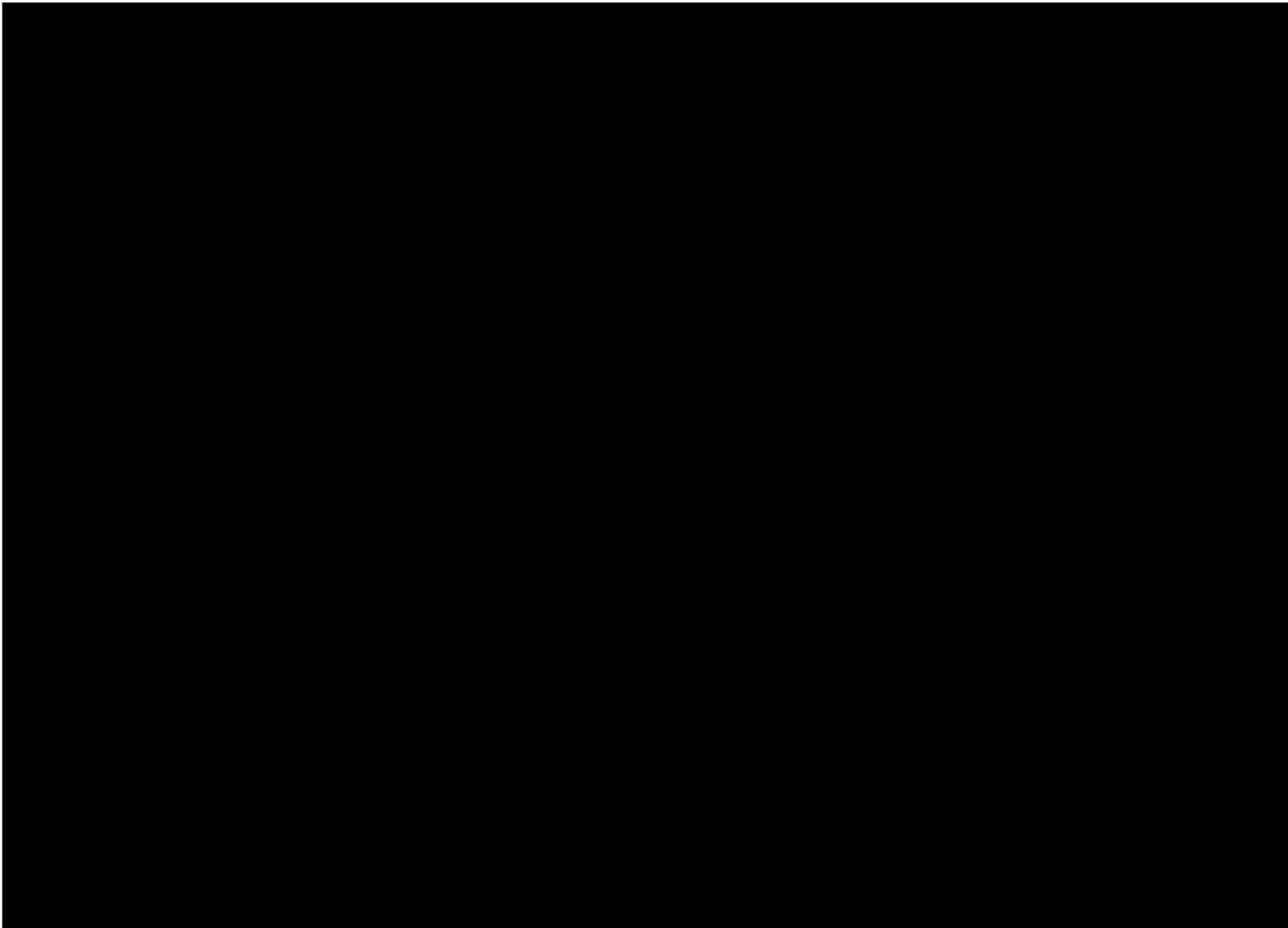
•Comments:

To whom it may concern,

10/21/15
09:24:08

KIA MOTORS AMERICA
Vehicle Master Inquiry - General Information

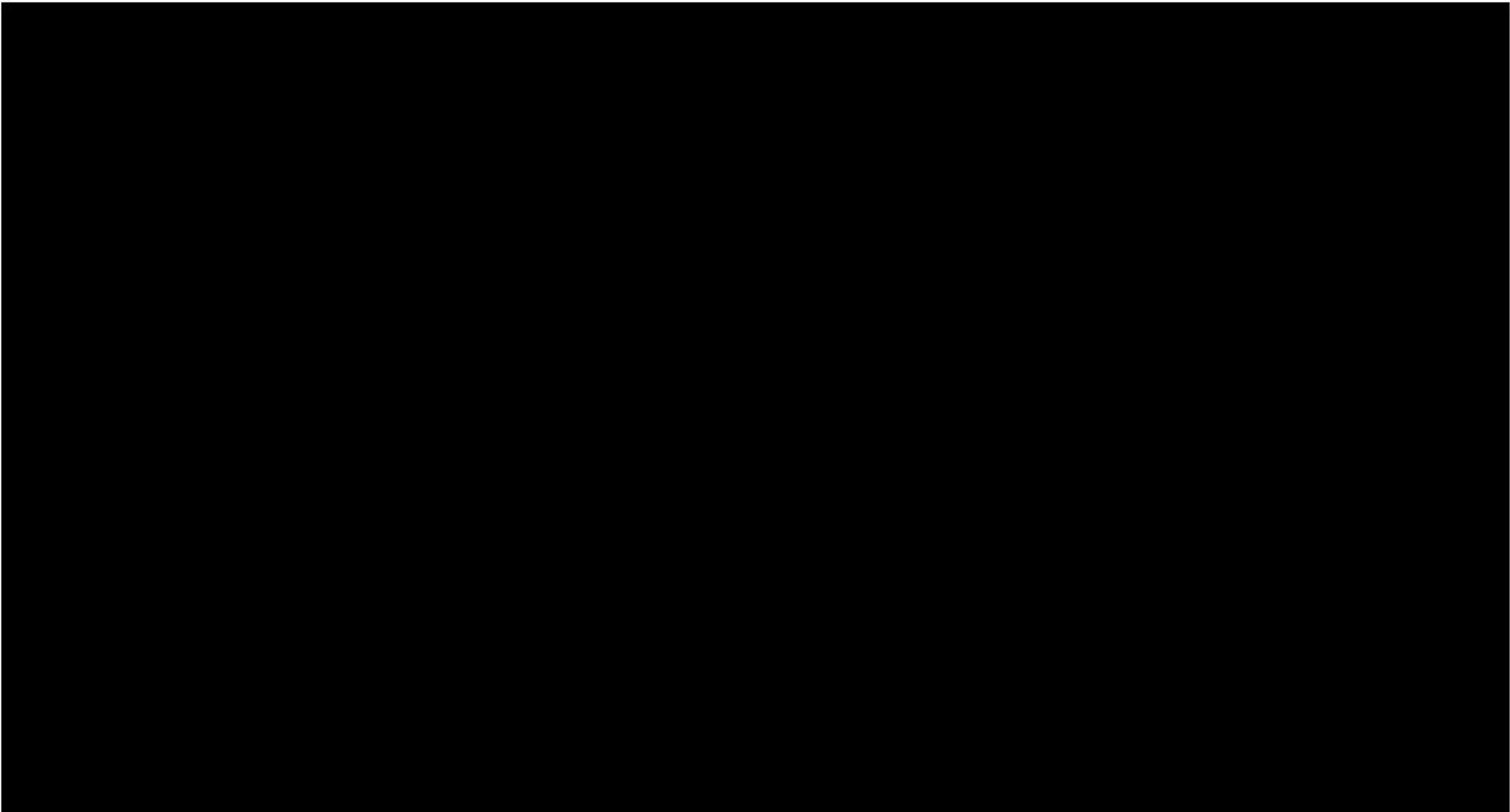
VSD [REDACTED]
STROUPJ



10/21/15
09:24:28

KIA MOTORS AMERICA
Vehicle Master Inquiry - General Information

VSDC [REDACTED]
STROUPJ



Replacement

Memorandum
Invoice

KIA MOTORS AMERICA

SOUTHERN REGION 100 GALLERIA PARKWAY SUITE 1550 ATLANTA GA [REDACTED]

DEALER NAME AND ADDRESS

INVOICE DATE

INVOICE NO

Replacement

DMG CONTRIBUTION

\$168.00

SUBTOTAL

\$17,360.00

\$16,947.00

OTHER CHARGES

INLAND FREIGHT & HANDLING

\$825.00

\$825.00

TOTAL

\$18,185.00

\$17,772.00

ATTENTION:

DEALER/FINANCING BANK - FOR REFERENCE
PURPOSES, PLEASE REFER TO ACH/DTC

MEMORANDUM INFORMATION ONLY
THIS DOCUMENT DOES NOT TRANSFER TITLE

ORIGINAL



Kia Motors America, Inc.
Corporate Headquarters
111 Peters Canyon Road
Irvine, CA [REDACTED] USA
T [REDACTED] F1 [REDACTED]

July 30, 2015

Law Offices of Maloney & Campolo, LLP
Tim Maloney
926 S. Alamo
San Antonio, TX [REDACTED]
Via email: [REDACTED]

[REDACTED] from Kia Motors America (KMA). KMA takes such matters seriously. After reviewing the service history for your client's 2013 Kia Soul (VIN: [REDACTED]), we are making offer to replace or repurchase your client's vehicle. Should your client also pay Attorney fees in the amount of \$1,750.00. All options will require [REDACTED] tions:

Option #1:

Replacement of vehicle with a comparable Kia vehicle. We propose to accomplish this via a "Substitution of Collateral" transaction with your current lien holder, whereby we would replace the current collateral on your loan with a mutually agreeable brand new Kia vehicle. All other terms and conditions of the underlying loan would remain the same. Of course, the accomplishment of this transaction would be contingent upon approval by your lien holder. Kia Motors America, Inc. would pay the license and registrations fees for the new vehicle. Should you decide to upgrade to a more expensive Kia vehicle, you would be responsible for the upgrade charge and the sales tax associated with the upgrade.

Option #2:

Repurchase of your current Kia vehicle

Purchase Price	\$ 17,054.00 **	subject to verification
Sales Tax	1,039.05	
Doc Fee	143.00	
Government Fees	44.00	
Administration Fee	131.00	
<u>Less Mileage deduction (based on 39,000 miles)</u>	<u><5,542.55></u>	

Total Settlement Amount for Option #2

\$ 12,824.50*

*Any outstanding vehicle liens will be paid from this amount. If the total settlement amount is not sufficient to pay off the outstanding lien on the vehicle, you will be responsible to provide a cashier's check payable to Kia Motors America, Inc., in the amount of any deficiency at the time of vehicle turn-in. You may be entitled to a refund for any unused portion of an extended service contract, if applicable.

Please indicate your acceptance of one of the above offers by signing this letter where indicated below and returning it via fax [REDACTED], so that we may begin processing your request.

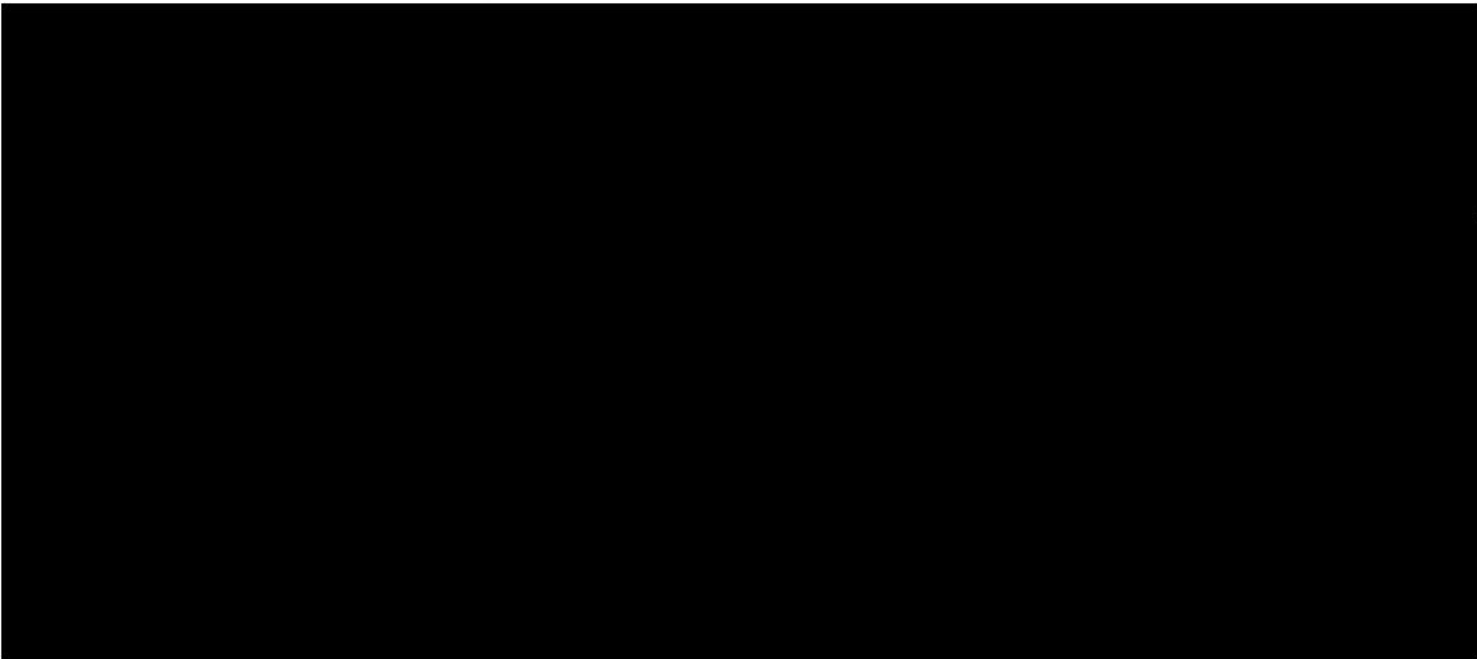
Please allow 45-60 days for completion of this process. Thank you for your courtesy and cooperation.

This offer is valid through 8/11/2015

SEP/08/2015/TUE 03:59 PM

FAX No.

P. 003



KIA VEHICLE TRADEOUT AUTHORIZATION

REPLACEMENT VEHICLE COSTS	
Dealer Invoice Price	\$ 17,772.00
PLUS: Dealer Doc Fees	\$ 143.00
PLUS: License Fees	\$ 148.50
PLUS: Sales Tax on: (a) \$ _____ OR (b) No sales tax is due (see attached certificate)	(a) \$ OR (b)
PLUS: Safety inspection, deputy fee, anti-theft	\$ 182.75
PLUS: Tire/title fee, GAP	\$ 484.84
SUBTOTAL	\$ 18,731.09
LESS: Customer Rebate (As Applicable)	< \$ 1,000.00
LESS: Owner Loyalty (As Applicable)	< \$ 0.00
LESS: Holdback (As Applicable)	< \$ 522.00
LESS: Customer Contribution (if paid to dealer)	< \$
LESS: NEW LOAN TO BE FUNDED	< \$
LESS:	< \$
LESS: Other (i.e., Test Drive Incentive) (As Applicable)	< \$
TOTAL NEW VEHICLE COST: (Amount Payable to Dealer or Kia)	\$ 17,209.09

* Seller/Lessor must disclose to buyer the reason(s) vehicle was returned to the dealer/manufacturer and brand title.

Dealer Representative

(Name Printed)

Date

Kia Representative

(Name Printed)

Date

REPURCHASE / REPLACEMENT CHECKLIST

Date region completed package	
Date NCA reviewed package	
A minimum of 10 business days is required for a priority package to be processed	

Type of case – check one	
☒ Voluntary settlement	☐ Legal settlement by region
☐ Legal settlement per KMA Legal Dept	☐ Settlement ordered by BBB or state
☐ Other (explain)	

Check and include all documents that apply in order listed below	
✓	<i>Repurchase Analysis Form (RAF)</i>
	<i>Included in package</i> <i>RAF is not yet complete. Will e-mail to NCA when ready</i>
✓	Checklist
	Score Card
✓	Customer Offer Letter / LNCS / ADL / Settlement Letter
	BBB or State Arbitration Decision <i>(if applicable)</i>
	BBB Customer Acceptance <i>(if applicable)</i>
	BBB Technical Expert Report <i>(if applicable)</i>
	BBB or Other Arbitration Claim / Filing Form <i>(if applicable)</i>
	Sales Documents – Original Vehicle – Sales / Lease Contract & Invoice (or copy of Screen 1 from the Vehicle Master). Deal Recap or Lease Worksheet optional
	Customer Rebate Claim Form or Printout from KIAS – Original Vehicle
	Loan Payoff Document
✓	Vehicle Tradeout Authorization <i>(if applicable)</i>
✓	Replacement Vehicle Invoice <i>(if applicable)</i>
✓	Substitution of Collateral Form <i>(if applicable)</i>
	Refinance Worksheet <i>(if applicable)</i>
	Repair Order Recap
	Tech Line Reports <i>Included in Package (if applicable)</i>
	FTR Inspection Report <i>(if applicable)</i>
	Campaign (Recall) List Showing Completed and Open Recalls
	Repair Orders
✓	Copy of VRS Screens and Clarify Screens
	OTHER (please specify):

K2942738

RCA Representative: MOJICAJ

Credit \$
ACV Recovry Amt \$
Current KMA Expense \$ 20,984.26

Initial Dlr to Buy/Other DLR to by veh: N

KMC Recovry Amt \$
KMA Nt Repr Exp \$ 20,984.26

Sold by Auct:(Y/N) N

Date sent to NAT: / /00

Date NAT Request Rcvd: / /00

KMA Chk Issue Date: / /00 Check #: 00

Last Mod By STROUPJ

Date KMA Check Mailed to Region: / /00

Last Mod date 12/16/15

Date Region Rcvd KMA Chk: / /00

Date ACV Recovery Chk/Crd Sent to NAT: / /00

Date ACV Recovery Chk/Crd Rcvd: / /00

Vendor Claim:

Date Closed Region:

Date Closed National:

Is delivering dealer buying trade: N

USED CAR GUIDE (Mon/Yr): / 00

Date Avail for Sale: 12/31/15

Floor Amt to Book Value: %

Gross Sales Price: \$

Owner State?: TX

Title Branding Required: (Y/N) Y

Book Value (WBV) \$

Floor Amount (Auct) \$

Actual Sold Date: /00/00

Grss Sls Prc to Bk Value: %

Date Title Received: / /00

Date Disclosure Received: / /00

Date Release Received: / /00

State Provisions for Subsequent Buyer: (Y/N) N

Current Location?: TX002 Arrived: 05 / 07 / 15 Sts?: PU Updt: 12 / 15 / 15

Auction Location: Arrived: 00 / 00 / 00 Sts?: Updt: 00 / 00 / 00

Salvage Yard: Arrived: 00 / 00 / 00 Sts?: Updt: 00 / 00 / 00

Disposition Comments:

YEAR: 2013

2. USED CAR GUIDE

Book Name:

Dlr Cost (Inv) \$ 17,383.00

Month/Year: /00

Page:

Book Value (Base Book) \$

DESCRIPTION

DESCRIPTION

ADD

\$
\$
\$
\$
\$
\$
\$

\$
\$
\$
\$
\$
\$
\$

Add \$

DED

Ded \$

Book Value (WBV) \$

				Sales Tax	\$	1,039.05
				License/State Fees	\$	131.00
				Dlr Document Fees	\$	143.00
				Interest Paid to Date	\$	
Other						
DESCRIPTION	ADD	DESCRIPTION	ADD			
GAP	\$ 451.84	AFTERMARKET	\$ 149.00			
	\$		\$			
	\$		\$			
	\$		\$	Sub Tot	\$	600.84
DLR or Cust Owe KIA	\$					
				Gross Repurchase Value =	\$	18,967.89
(7B) DEDUCTIONS				Mileage	\$	
Other				Dealer Contribution	\$	
DESCRIPTION	DEDUCT	DESCRIPTION	DEDUCT			
	\$		\$			
	\$		\$	Sub Tot	\$	
DEALER REBATE:	\$			Total Deductions =	\$	
	(7A MINUS 7B = 7C)			(7C) Net Repurchase Value	\$	18,967.89

Other ADD		License/State Fees	\$	148.50
DESCRIPTIONS		Dlr Document Fees	\$	143.00
SAFETY/DEPUTY	\$ 182.75	GAP	\$	484.84
RENTAL	\$ 3275.17		\$	
	\$		\$	
DLR or Cust Owe KIA	\$	Sub Tot	\$	3,942.76
(8B) DEDUCTIONS		Gross New Vehicle Value =	\$	22,006.26
		Customer Contribution	\$	
		Dealer Contribution	\$	
		Dealer Contribution	\$	
		Owner Loyalty	\$	500.00
		Dealer Rebate	\$	
		Other	\$	
Hold Back Amount:	522.00	Total Deductions =	\$	1,022.00
(8A MINUS 8B = 8C)		(8C) Net New Vehicle Value	\$	20,984.26
		Net Repurchase Value (7C)	\$	18,967.89
(LESS)		Net New Vehicle Value (8C)	\$	20,984.26
(EQUALS)		Savings to KMA	\$	2,016.37-

Check Payable Lienholder		\$	
Check Payable Customer		\$	
Check Payable to Other		\$	
= Gross Repurchase Expense		\$	20,984.26
- Credit Amount		\$	
- LESS ACV Recovery Amount		\$	
= Current KMA Expense		\$	20,984.26
- LESS KMC Recovery Amount	KMA Sbm Date: / / 00	\$	
= KMA Net Repurchase Expense		\$	20,984.26

The Gross Repurchase Expense is the "Net Repurchase Value" from the Repurchase Calculation Section (Scr 7) or the "Net New Vehicle Value" from the Exchange of Collateral Section (Scr 8).

Nt Repr Value \$ 18,967.89 Nt New Veh Value \$ 20,984.26

Part#:

Total Days Down: 001 DTC(if any):

REPURCHASE COMMENTS (KCR)	(Include All Payee's Name and Address)

THE ANCIRA WINTON CHEV INC
ANCIRA KIA
5720 NW LOOP 410
P.O. BOX [REDACTED]
SAN ANTONIO, TX [REDACTED]

\$20,984.26

— — — — —



Kia Motors America, Inc.
Corporate Headquarters

171 Peters Canyon Road
Irvine, CA [REDACTED] USA

T [REDACTED] F [REDACTED]

July 30, 2015

[REDACTED]

Kia Motors America (KMA). KMA takes such matters seriously and after reviewing the service history for your client's 2013 Kia Soul (VIN: [REDACTED]) we are pleased to offer you the option to replace or repurchase your client's vehicle. Should your client require Attorney fees in the amount of \$1,750.00. All options will require

Option #1:

Replacement of vehicle with a comparable Kia vehicle. We propose to accomplish this via a "Substitution of Collateral" transaction with your current lien holder, whereby we would replace the current collateral on your loan with a mutually agreeable brand new Kia vehicle. All other terms and conditions of the underlying loan would remain the same. Of course, the accomplishment of this transaction would be contingent upon approval by your lien holder. Kia Motors America, Inc. would pay the license and registrations fees for the new vehicle. Should you decide to upgrade to a more expensive Kia vehicle, you would be responsible for the upgrade charge and the sales tax associated with the upgrade.

Option #2:

Repurchase of your current Kia vehicle

Purchase Price	\$ 17,054.00 **	subject to verification
Sales Tax	1,039.03	
Doc Fee	143.00	
Government Fees	44.00	
Administration Fee	131.00	
Less Mileage deduction (based on 39,000 miles)	<5,542.55>	

Total Settlement Amount for Option #2 \$ 12,824.50*

*Any outstanding vehicle liens will be paid from this amount. If the total settlement amount is not sufficient to pay off the outstanding lien on the vehicle, you will be responsible to provide a cashier's check payable to Kia Motors America, Inc., in the amount of any deficiency at the time of vehicle turn-in. You may be entitled to a refund for any unused portion of an extended service contract, if applicable.

Please indicate your acceptance of one of the above offers by signing this letter where indicated below and returning it via fax [REDACTED], so that we may begin processing your request.

Please allow 45-60 days for completion of this process. Thank you for your courtesy and cooperation.

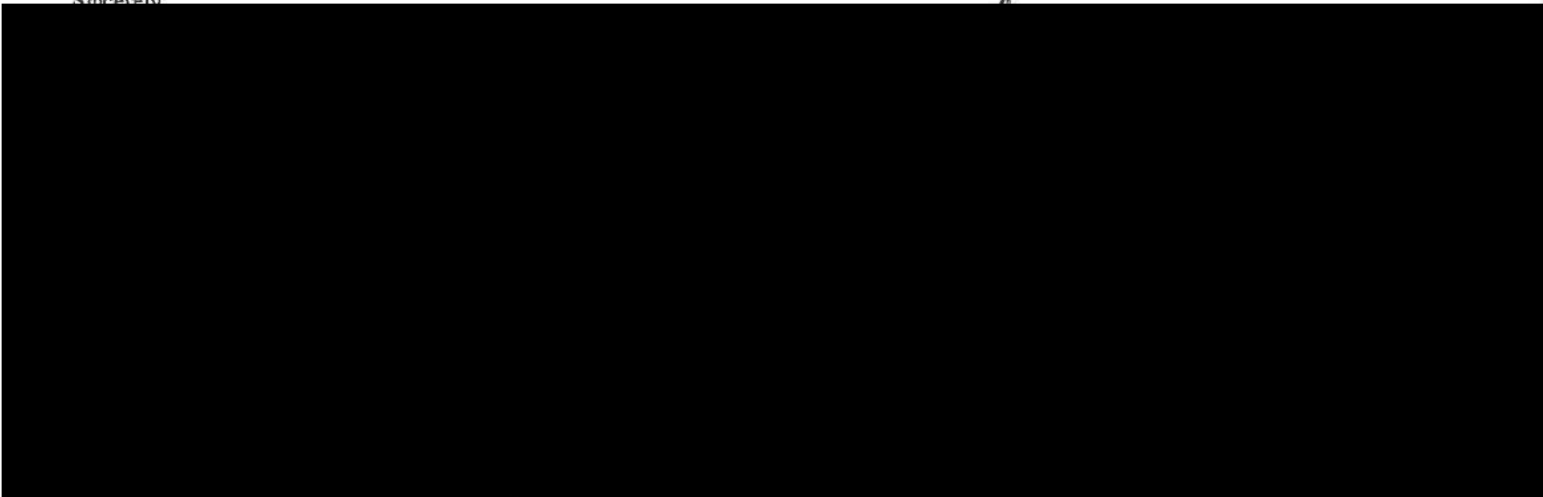
This offer is valid through 8/11/2015

SEP/08/2015/TUE 03:59 PM

FAX No.

P.003

Sincerely,



Date: 12/3/2015

Comments:

The dealership will need to have the customer sign this document and overnight to Special Ops. The package should include the following:

- Original Substitution of Collateral Form
- Gap form updated w/ new VIN (if applicable)
- Service Contract form updated w/ new VIN (if applicable)

We will need the original signed SUBSTITUTION OF COLLATERAL AGREEMENT form sent directly to Special Operations at the following address:

Capital One Auto Finance
Attention: Special Operations
8058 Dominion Parkway
Plano, Texas

Thank you,
Special Operations
8058 Dominion Parkway
Plano, TX
1- fax



VEHICLE/VESSEL TRANSFER AND REASSIGNMENT FORM

This form is not the ownership certificate. It must accompany the titling document or application for a duplicate title.
INSTRUCTIONS ON REVERSE SIDE ALL SIGNATURES MUST BE IN INK PHOTOCOPIES NOT ACCEPTED

Vehicle/Vessel ID

Bill of Sale

Odometer

Buyer

Seller

Power of Attorney

SECTION 1: Vehicle/Vessel Description

IDENTIFICATION NUMBER	YEAR MODEL	MAKE	LICENSE PLATE/CF #	MOTORCYCLE ENGINE #

SECTION 3: Odometer Disclosure Statement (Void if Mileage is Altered or Erased)

Federal and State Law requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

The odometer now reads (no tenths) miles, and to the best of my knowledge reflects the actual mileage **unless one of the following statements is checked.**

WARNING—ODOMETER DISCREPANCY

☐ Odometer reading is **NOT** the actual mileage ☐ Mileage exceeds the odometer mechanical limits
Explain odometer discrepancy: _____

SECTION 4: Buyer and Seller (MUST print his or her name, date and sign this section.)

BUYER

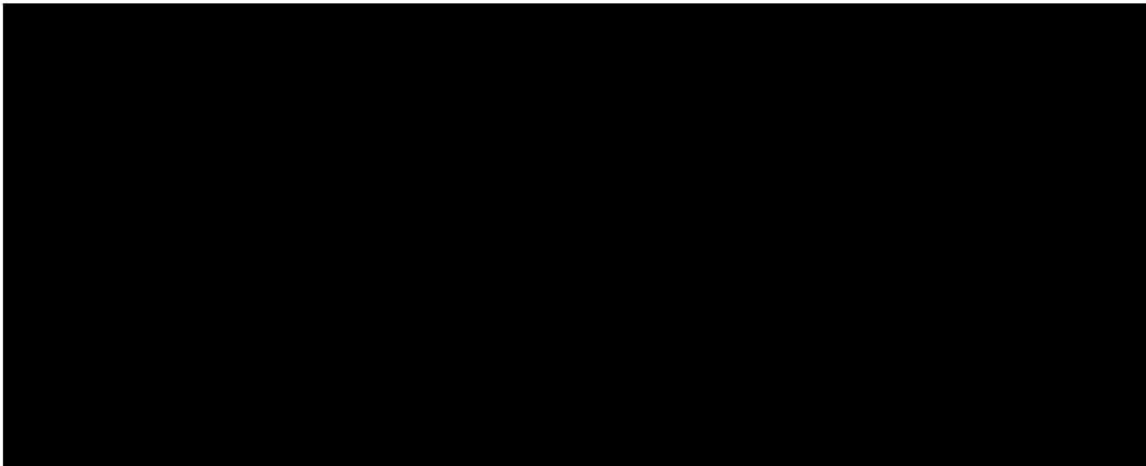
I acknowledge the odometer reading and the facts of the transfer. I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

PRINT NAME <i>Kia Motors America, Inc.</i>	SIGNATURE <i>X</i>	DATE	DL, ID OR DEALER #
PRINT NAME	SIGNATURE <i>X</i>	DATE	DL, ID OR DEALER #
PRINT NAME	SIGNATURE <i>X</i>	DATE	DL, ID OR DEALER #
MAILING ADDRESS	CITY	STATE	ZIP

SELLER

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and

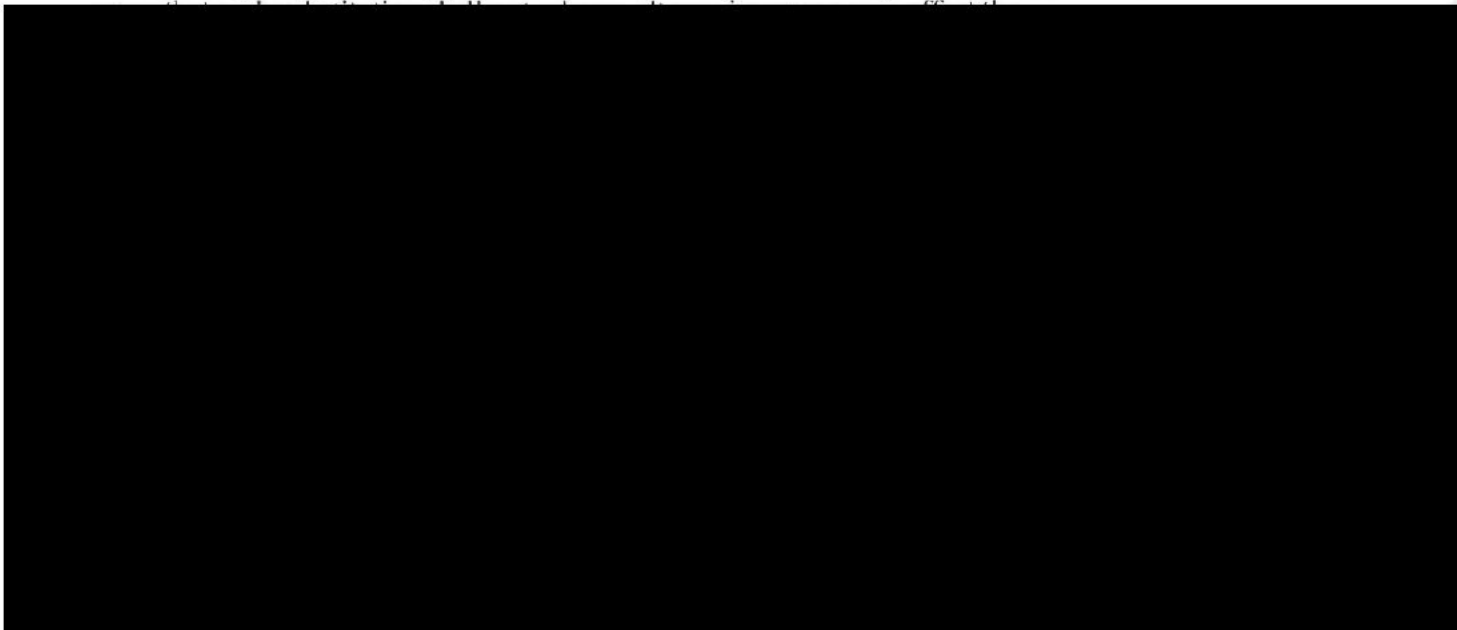
SUBSTITUTION OF COLLATERAL AGREEMENT



under the Contract. The security interest is to the same extent as described in the Contract. Buyer and Creditor understand and agree that all terms and conditions of the Contract shall continue in full force and effect, except that the obligations of Buyer and the rights and remedies of Creditor contained therein with respect to the Original Collateral shall apply to the Substitute Collateral as if the Substitute Collateral were originally the subject of the Contract. Buyer will take whatever actions are necessary, including but not limited to those actions reasonably requested by Creditor and Seller, to ensure that Creditor's first lien in the Substitute Collateral is perfected.

CONSENT OF GUARANTOR(S)

The undersigned, guarantor(s) of the Contract, consent to the foregoing substitution and





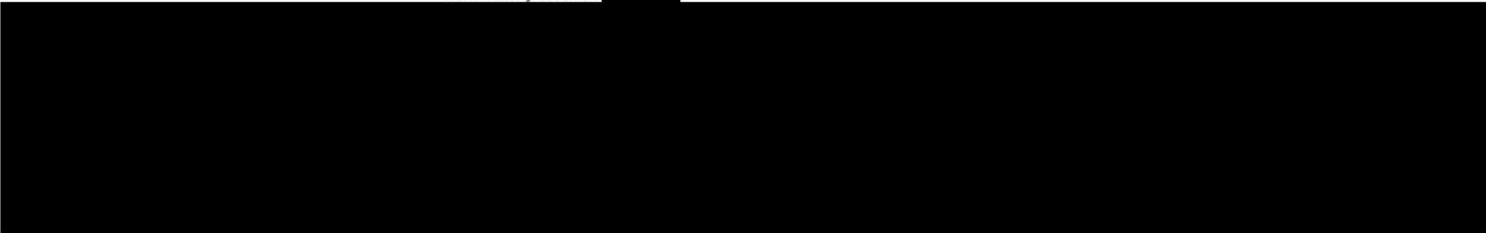
RELEASE OF TITLE

TO: Capital One Auto Finance



THE UNDERSIGNED HEREBY AUTHORIZES AND DIRECTS YOU TO SURRENDER TO KIA MOTORS AMERICA, INC., OR ORDER, THE PROPERLY-ENDORSED CERTIFICATE OF OWNERSHIP TO THE ABOVE-DESCRIBED VEHICLE. THE CERTIFICATE OF OWNERSHIP, PROPERLY ENDORSED, MUST BE MAILED TO:

Name, National Consumer Affairs
Kia Motors America, Inc.
111 Peters Canyon Road
Irvine, CA [REDACTED]



KIA VEHICLE TRADEOUT AUTHORIZATION

REPLACEMENT VEHICLE COSTS

Dealer Invoice Price	\$ 17,772.00
PLUS: Dealer Doc Fees	\$ 143.00
PLUS: License Fees (Temp tag)	\$ 148.50
PLUS: Sales Tax on:	(a) \$
(a) \$ _____ OR	OR
(b) No sales tax is due (see attached certificate)	(b)
PLUS: Safety inspection, deputy fee, anti-theft	\$ 182.75
PLUS: Title Fee, <i>GAP?</i>	\$ 484.84
SUBTOTAL	\$ 18,731.00
LESS: Customer Rebate (As Applicable)	< \$ 500.00
LESS: Owner Loyalty (As Applicable)	< \$ 0.00
LESS: Holdback (As Applicable)	< \$ 522.00
LESS: Customer Contribution (if paid to dealer)	< \$
LESS: NEW LOAN TO BE FUNDED	< \$
LESS:	< \$
LESS: Other (i.e., Test Drive Incentive) (As Applicable)	< \$

16867

KIA MOTORS AMERICA

DEALER NAME AND ADDRESS

INVOICE DATE	
--------------	--

INVOICE NO	
------------	--

		DMG CONTRIBUTION	\$168.00
		SUBTOTAL	\$17,360.00
		OTHER CHARGES	
		INLAND FREIGHT & HANDLING	\$825.00
		TOTAL	\$18,185.00

ATTENTION:

DEALER/FINANCING BANK - FOR REFERENCE
PURPOSES, PLEASE REFER TO ACH/OTC

MEMORANDUM INFORMATION ONLY
THIS DOCUMENT DOES NOT TRANSFER TITLE

K 38



Rental Company: ENTERPRISE RENT-A-CAR
 Invoice: D [REDACTED] 8-5221
 Alternate Invoice Number: 1WTW0N

TABLE:

: 8/1/15 to 11/8/15 (100 days)
 : 8/1/15 to 11/8/15 (99 days)

and Service	Rate	Amount
	26.75	\$2,648.25
Base Charges		
	1.31	\$129.69
	6.25%	\$173.62
Total Charges:		\$2,951.56
Less Amount Received:		\$0.00
Total Amount Due:		\$2,951.56

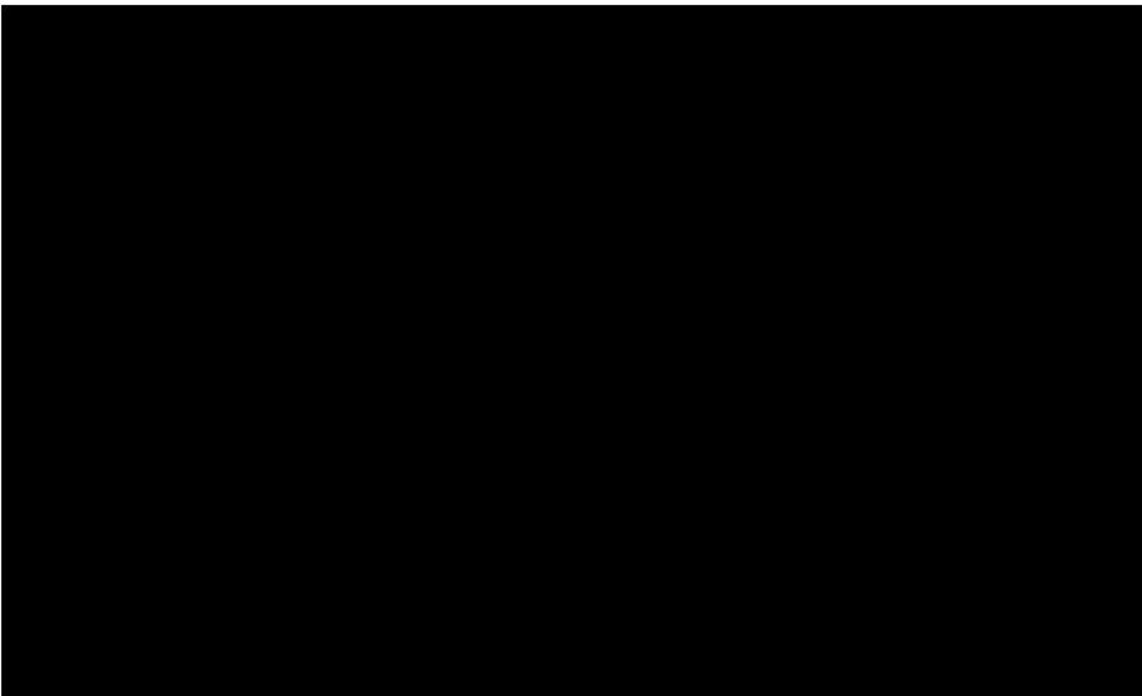
Please Return This Portion with Remittance

Make Payment To:
 ENTERPRISE RENT-A-CAR (5299)
 1505 HARRY WURZBACH

SAN ANTONIO, TX [REDACTED]
 Federal ID: [REDACTED]

Total Charges: \$2,951.56
 Less Amount Received: \$0.00
 Total Amount Due..... \$2,951.56

Please include on your check:
 Invoice: D [REDACTED] 8-5221



8C17467M

Mileage	Owner's Name
	Tonya Bailey

Worksheet with owner at delivery. Please make sure the customer
sees the features that are shaded. After completion, sign the worksheet,
leaving remaining copies to the proper dealership staff.

- ☐ Wash and clean vehicle interior & exterior
- ☐ Verify completion of PDI & In-Stock Vehicle Maintenance Record
- ☐ Inspect interior carpets, headliner, cup holders, & console for cleanliness

- ☐ Check TPMS system—adjust tire pressure as necessary
- ☐ Inspect under hood, door jambs, trunk for cleanliness
- ☐ Inspect exterior for dirt, scratches, dents & dings
- ☐ Confirm "Good Battery" using the Kia battery tester

1. Documentation – Steps 1-6 with Customer

- ☐ Explain the Kia Pre-Delivery Inspection process
- ☐ Review Features & Functions Guide (FFG)
- ☐ Review, sign, date, and detach Vehicle Delivery Checklist in Features & Functions Guide (FFG) and place in "Deal Jacket"
- ☐ Review Owner's Manual
- ☐ Review Warranty & Consumer Information manual
- ☐ Review Tire Warranty booklet
- ☐ Review Consumer Information brochures (Fuel Economy and TPMS)

2. Maintenance Requirements to Validate Warranty

- ☐ Review recommended maintenance schedule in Owner's Manual
- ☐ Review service visit log section of Warranty & Consumer Information manual
- ☐ Explain time and/or mileage service intervals—whichever occurs 1st
- ☐ Explain importance of service record retention to update scheduled maintenance

3. CUSTOMER 360° Parts and Service Orientation

- ☐ Schedule first vehicle service appointment **NOTE:** If either the Parts or Service Departments are closed, please provide the appropriate business cards
- ☐ Tour areas, introduce staff & explain value of Kia parts & service
- ☐ Review hours & Customer 360° Service Experience

4. Vehicle Orientation – Review ALL items below. Particular attention should be given to items that are shaded

Use the Features & Functions Guide; Explain the location and operation of the following items (if equipped):

Under Hood

- ☐ Check fluid levels
- ☐ Fuse panels
- ☐ Battery cover

Driver's Side / Interior

- ☐ Remote key & lock operation
- ☐ Remote start / Push button start (Accessory Mode)
- ☐ Seat & headrest adjustments
- ☐ Seat warmers / coolers (ventilated)
- ☐ Pedal adjustments
- ☐ Power windows, locks & mirrors
- ☐ AWD and AWD LOCK
- ☐ ISG (Idle, Stop, Go) System
- ☐ Electronic Stability Control (ESC)
- ☐ Downhill Brake Control (DBC)
- ☐ Hill-start Assist Control (HAC)
- ☐ Exterior & interior light controls
- ☐ Advanced lighting speaker (mood)
- ☐ Steering wheel controls (**Bluetooth** & Heating)
- ☐ Gauges, meters & odometer
- ☐ Trip Button (Set "Distance to Service" mode)
- ☐ Fuel Economy (ECOMINDER / Active ECO) indicator
- ☐ Tire Pressure Monitoring System (TPMS) / proper air pressure / interference issues
- ☐ Front and rear wipers / washers
- ☐ Rear view mirror dimming function
- ☐ Homelink

- ☐ Clock
- ☐ Audio system & radio presets
- ☐ SiriusXM Satellite Radio
 - ☐ General operation
 - ☐ Presets
 - ☐ Traffic for Navigational Units
- ☐ **Bluetooth** system
 - ☐ Pairing phone
 - ☐ Changing language
 - ☐ Voice Set-Up/Speaker Adaptation
- ☐ UVO System
 - ☐ Voice Recognition
 - ☐ My Jukebox
 - ☐ Comments
 - ☐ Streaming Audio/Text
 - ☐ HD Radio
- ☐ Navigation system
- ☐ Rear parking assist / Rear view camera
- ☐ AUX / USB / iPod port / applicable cables
- ☐ Climate Control / Defrosters – button locations
- ☐ Power outlets
- ☐ Consoles – center and overhead
- ☐ Sunshade / sunroof control lever (2 detent positions)
- ☐ Power folding mirror switch (to synch)
- ☐ Automatic transmission
 - ☐ Adaptive Shift
 - ☐ Sportmatic
 - ☐ Learning
 - ☐ Paddle shifters
- ☐ Motor Driven Power Steering
- ☐ Cruise control
- ☐ Manual transmission (shift sequence & procedure)
- ☐ Air bags & Occupant Detection System (ODS) indicator

Rear Seat / Interior

- ☐ Child locks, LATCH
- ☐ Cup holders, armrest
- ☐ Rear climate control, operation
- ☐ Seat Operation – 2nd Row / 3rd Row
- ☐ Rear seat entertainment system (RSE)

Trunk / Exterior

- ☐ Key & fob control
- ☐ Seat fold down releases
- ☐ Trunk lid / fuel door emergency release
- ☐ Tire Mobility Kit / Spare tire & tools
- ☐ Trailer hitch
- ☐ Wheel Lock key
- ☐ Fuel filler door & cap operation
- ☐ Tailgate / trunk operation

Hybrid

- ☐ Virtual Engine Sound System (VESS)
- ☐ Unique gauges on instrument panel / Navigation screen
- ☐ Unique safety precautions:
 - ☐ Orange high-voltage cables, wires, connectors
 - ☐ No liquids near hybrid-battery intake
 - ☐ Secure large/heavy loads in trunk
- ☐ Emergency trunk release location
- ☐ Location of 12V battery and 270V high-voltage hybrid battery
- ☐ Regenerative braking -- sound and feel

5. KIA Delivery First Pledge Review

- ☐ Your vehicle is spotlessly clean
- ☐ Vehicle functions were fully explained
- ☐ Your vehicle doesn't have any dents, dings or scratches
- ☐ Ensure 100% satisfaction with sales and delivery process, and no problems with the vehicle

6. Customer Satisfaction Phone Survey

- ☐ Confirm time and best phone number for initial dealer follow-up
- ☐ Explain the customer satisfaction phone survey program regarding the customer's sales and service experience

RETAIL INCENTIVE CLAIM FORM

BUYER INFORMATION

[Redacted Buyer Information]

[Redacted Buyer Information]

SERVICE LLOYDS INSURANCE COMPANY

P.O. Box 26800, Austin, Texas 78765-0800

(512) 343-0800

PRODUCER NO.

70558

POLICY NUMBER

TX [REDACTED] 04

DEAL NUMBER

GAP APPLICATION AND DECLARATIONS PAGE**Disclosure of Guaranty Fund Non-Participation**

In the event the insurer is unable to fulfill its contractual obligation under this policy or contract or application or certificate or evidence of coverage, the policyholder or certificate holder is not protected by an insurance guaranty fund or other solvency protection arrangement.

☒ Retail – Purchase ☐ Retail – Balloon ☐ Lease

APPLICANT INFORMATION

GAP coverage will provide protection for the insured when the above listed vehicle is involved in a loss which is determined to be a Total Loss (as defined in the GAP Agreement). GAP coverage will pay the difference between the finance balance at the time of loss and the Actual Cash Value (as defined in the GAP Agreement). Other conditions and restrictions apply to this coverage. Refer to the GAP Agreement, attached hereto and made a part hereof, for specific details of coverage.

INSURED'S APPROVAL AND AGREEMENT

The insured by signing below acknowledges that the insured has read this application and declarations page, received a copy of the GAP Application and Declarations Page as well as a copy of the GAP Agreement, and that the benefits and limitations of GAP coverage have been explained to him. The undersigned also authorizes Service Lloyds Insurance Company and its agents to obtain and use all insurance information pertaining to any loss on the above listed



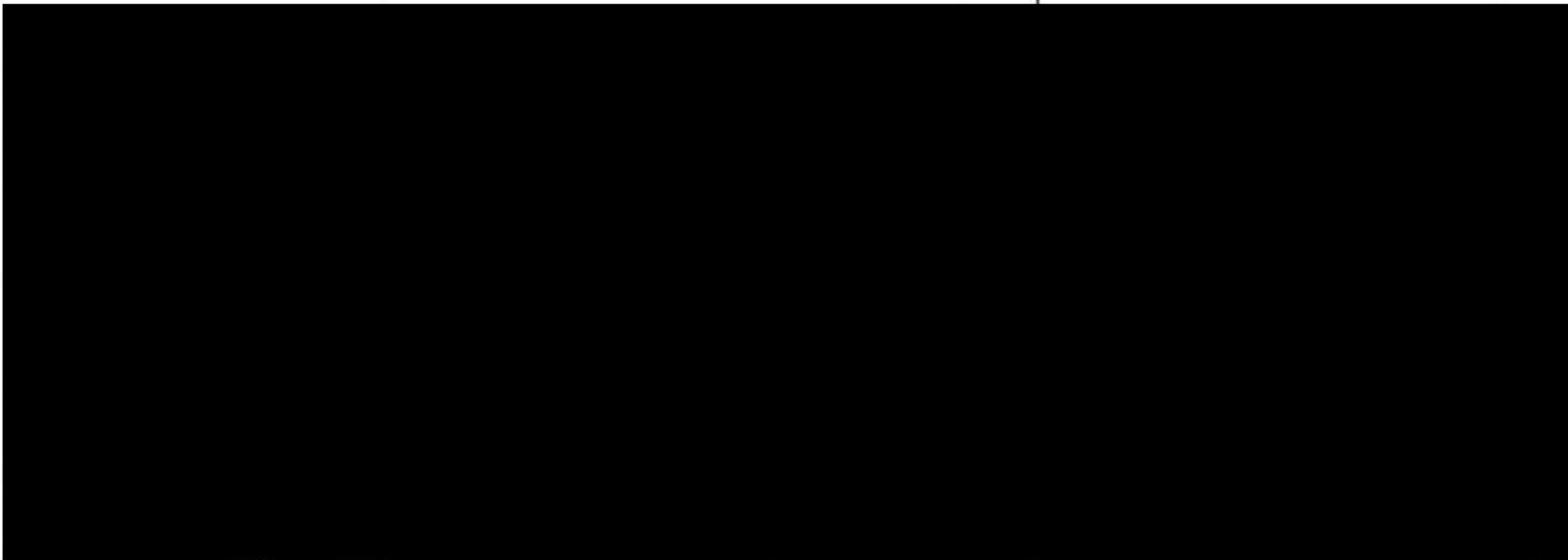
A DOCUMENTARY FEE IS NOT AN OFFICIAL FEE. A DOCUMENTARY FEE IS NOT REQUIRED BY LAW, BUT MAY BE CHARGED TO BUYERS FOR HANDLING DOCUMENTS RELATING TO THE SALE. A DOCUMENTARY FEE MAY NOT EXCEED A REASONABLE AMOUNT AGREED TO BY THE PARTIES. THIS NOTICE IS REQUIRED BY LAW.

I agree to pay in cash upon demand, any balance owed on the trade-in over and above the amount shown on this order, and warrant that said trade-in is free and clear of all liens, charges, and indebtedness, except as above shown, and that I have good title to said automobile and the right to sell and convey the same. Should financing company refuse to purchase the contract as entered into this date, I agree to return the automobile herein described to the dealer immediately and I agree to pay the dealer in cash for such depreciation of the value of the automobile as occurred while it was in my possession.

DISCLAIMER OF WARRANTIES

The above described vehicle sold by Seller is sold AS IS, without either express or implied warranties of any kind by Seller, including warranties of merchantability or fitness, and Purchaser will bear the entire expense of repairing or correcting any defects that presently exist or that may occur in the vehicle, unless a written warranty by, or service contract with Seller covering the described vehicle is delivered to Purchaser in conjunction with or within 90 days following the time of the sale, but such vehicle or any of its component parts may be subject to warranty by the manufacturer thereof. In the event a credit transaction is proposed, no contractual relationship is created hereby and the following is an offer by the purchaser to the

SELLING PRICE	██████████0
DEALER'S INVENTORY TAX	39.18
STATE TAX	N/A
LICENSE G.V.W.	██████████
STATE INSP. & TITLE	56.75
DOC FEE	143.00
ID Theft	149.00
DEPUTY FEE	5.00
TOTAL	██████████43

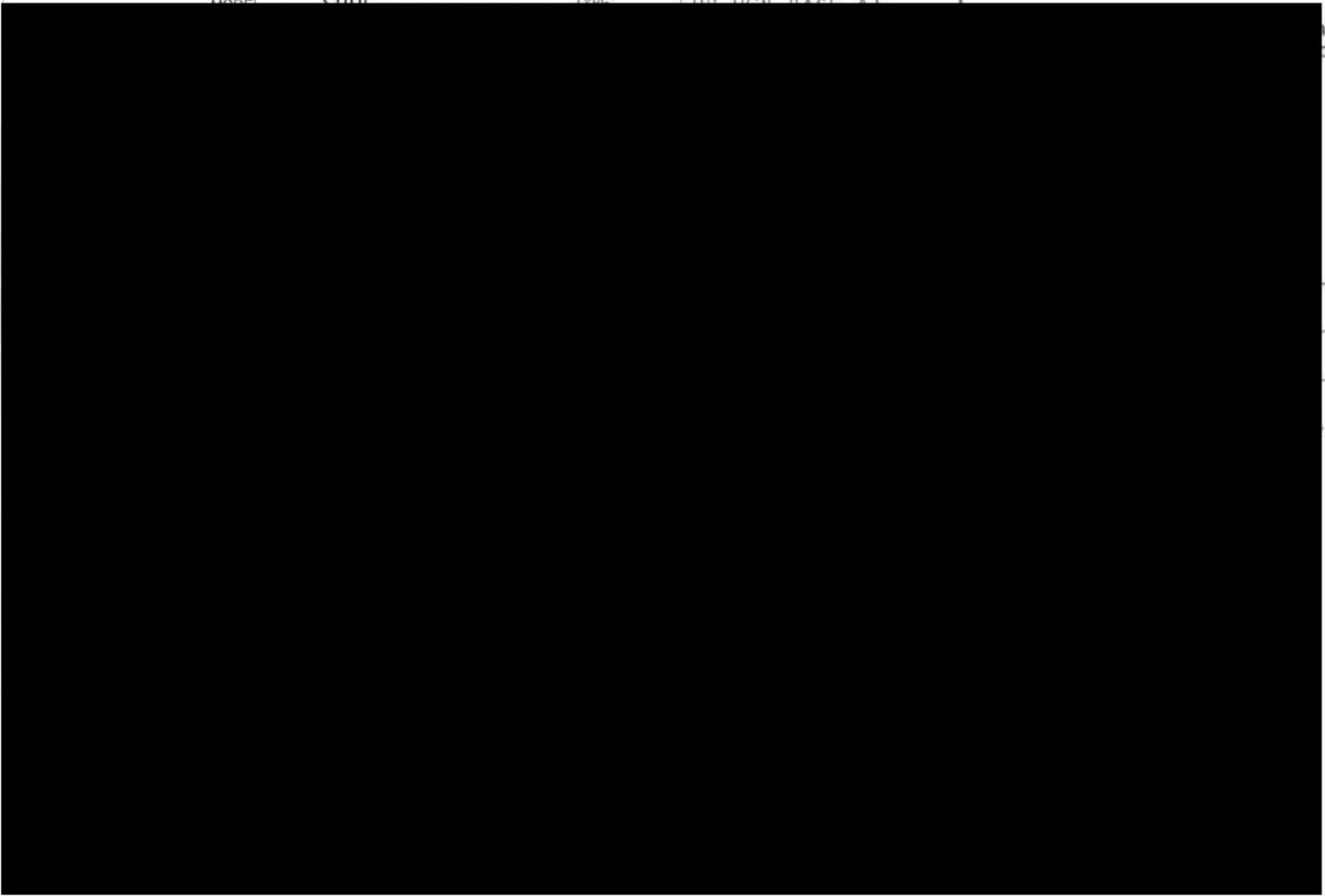


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"Surround yourself with the dreamers and doers, the believers and the thinkers, but most of all, surround yourself with those who see the greatness within you, even when you don't see it yourself."

Edmund Lee

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Consumer Assistance Center Case Report

Printed By: JMojica

Case Number - K[REDACTED]38

12/16/[REDACTED]2:47:51 PM

3. [REDACTED]
4. Your case number is K[REDACTED]38

Caller

1. Ok, thank you.
2. I am currently at work, I have to go.

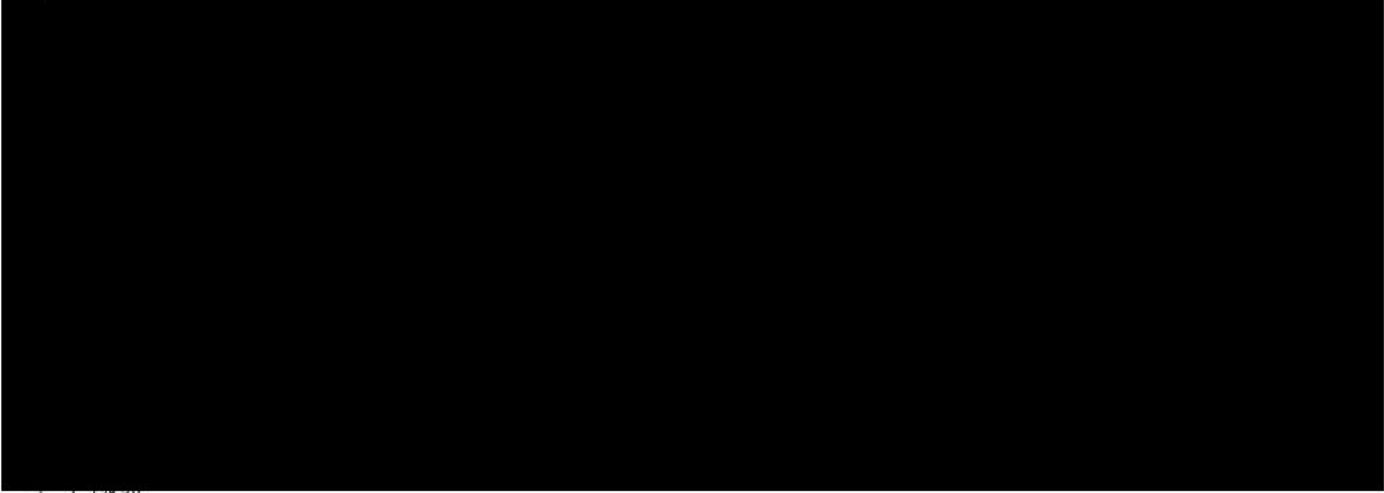
*** CASE PRIORITY CHANGED 05/07/[REDACTED]7:03:57 AM (Local Time) ERuiz
from priority Standard to priority Escalated

*** NOTES 05/07/[REDACTED]7:05:16 AM (Local Time) ERuiz Action Type: Manager review

Writer*

1. Case dispatch to NCA

Case History

- a) Cust alleged the vehicle caught fire
 - b) Fire report was documented.
 - c) Requested pictures
 - d) Please call the cust back and handle the case accordingly
- 

1. Okay

2. I am still shaking, I remembered I looked at all the smoke and the flames and then the vehicle back lights blink and my car all of a sudden started by itself
3. Even after the flames were put out the vehicle was still running
4. I can still smell the flames and all that
5. It was so scary

Writer states:

1. Apologized
 2. Advised that writer is glad to hear customer is okay
 3. Advised that NCA will be in touch as soon as possible after reviewing case
- 

back today. Provided CSR's Ext 1191 and NCA phone# [REDACTED]

*** PHONE LOG 05/08/ [REDACTED] 7:51:25 AM (Local Time) JMoJica Action Type: Ltr/email/fax sent
Customer left VM:

1. I know this process takes a couple of days.
2. I am just sad because I haven't heard from anyone.
3. The dlr has been great.
4. I know you are busy, but I would appreciate you getting back to you today.
5. I saw my car catch fire right in front of me.
6. Please c/b.

*** PHONE LOG 05/08/ [REDACTED] 10:22:51 AM (Local Time) JMoJica Action Type: Outgoing call
Wtr left VM for customer requesting c/b.

*** PHONE LOG [REDACTED] PM (Local Time) JMoJica Action Type: Incoming call
Customer left VM requesting c/b.

*** PHONE LOG 05/08/ [REDACTED] 2:46:24 PM (Local Time) JMoJica Action Type: Outgoing call
Wtr spoke to SA Justin (SM Preston at lunch):
1. Wtr requested pictures of instrument panel, and pictures of underneath the steering wheel. Are there any aftermarket?
2. SA stated pictures will be emailed over, SA stated 1 aftermarket (light kit).
3. Wtr informed SA to please put customer in loaner.
4. SA stated customer will be contacted once loaner is available.

*** PHONE LOG 05/08/ [REDACTED] 2:47:09 PM (Local Time) JMoJica Action Type: Outgoing call
Wtr left VM for customer:
1. I spoke to the dlr and they will contact you once a loaner is available.
2. Please c/b.

*** PHONE LOG 05/08/ [REDACTED] 1:00:42 PM (Local Time) JMoJica Action Type: Outgoing call
Customer left VM (3x) requesting c/b.

Case History

*** PHONE LOG 05/08/2015 2:15:33 PM (Local Time) JMoJica Action Type: Outgoing call

Wtr:

1. I am glad we are finally able to communicate.
2. Informed of loaner.

Customer:

1. Yes, I got your VM and I called the SM.
2. They are working on getting me a loaner.
3. They are going to call me back about it.

Wtr:

1. I am glad to hear that.
2. I wanted to touch base with you because I want to apologize for the incident that occurred.
3. We want to look into this further, and I have requested pictures from the dlr.
4. Once I get the pictures, I will review with my engineer.

Customer:

1. Ok, thank you.
2. Everything that happened is just so weird.
 - I was sitting in my car.
 - I was on the phone, talking to my mentor, and my legs were outside the car.
 - All of a sudden, I see smoke coming from the steering wheel area.
 - I hung up, called 911, went inside Plato's Closet and told the lady to give them the address.
 - Then, we tried to find the people that owned the Mercedes and the Suburban parked next to me.
 - There were 3 men who helped me.
 - Anna's Linen's and Platos Closet both let us use their fire extinguisher.
 - It all happened so fast I don't even know how we got them.
 - One of the guys was a mechanic and he was helping get my stuff out of my car along with the other guy who was a detective.
 - The other helped extinguish the fire, but I don't know who he was.

Wtr:

1. I am so sorry to hear that.
2. Were the other cars damaged?
3. Were there any aftermarket's on the vehicle?

Customer:

1. No, I didn't install anything.
2. The other cars did not get damaged, the fire didn't go outside the car.

Wtr:

1. Ok, we don't take this lightly and do want to look further into it.
2. I will call you next week on Monday or Tuesday with more info.
3. Provided email address
4. If we are having trouble getting each other on the phone we can schedule something via email.
5. Wtr thanked and disconnected.

*** PHONE LOG 05/11/2015 3:21:01 PM (Local Time) JMoJica Action Type: Outgoing call

Wtr spoke to SA Bianca:

1. Wtr informed SA that wtr has not received pictures.
2. Wtr informed SA that KMA engineer inspection is tentatively scheduled for 5/15/15.

*** PHONE LOG 05/12/2015 3:13:52 AM (Local Time) JMoJica Action Type: Incoming call

SM Javier left VM:

1. We have been trying to send these to you but they won't go through.
2. It says its undeliverable.
3. Anyway, we got an ADL for this.

[REDACTED]

Javier,

I got the ADL. However, I still haven't gotten any pictures. I would suggest sending one or two pictures per email. That might help.

[REDACTED]

pe: Outgoing call

1. The dlr got your letter and sent me a copy.
2. If you are representing Ms. Bailey, KMA will need a letter stating so.

Tim Maloney:

1. Ok, if you send me an email I will reply with what you are looking for.
2. Its simple, [REDACTED]

Wtr:

1. I will send you an email once we are off the phone.
2. I also wanted to mention to you that we do have a tentative non-destructive inspection scheduled for 5/15/15.
3. However, those pictures are Kia's pictures.

Tim Maloney:

1. Ok, that's fine as long as you are agreeing to a non-destructive inspection.
2. We will possibly have something out there too.

Wtr:

1. Ok, well I will send you that email.
2. Thanked and disconnected.

*** PHONE LOG 05/13/ [REDACTED] 9:56:27 AM (Local Time) JMOjica Action Type: Ltr/email/fax rec'd
Wtr received dlr pictures from DPSM.

*** PHONE LOG 05/13/ [REDACTED] 9:56:46 AM (Local Time) JMOjica Action Type: Ltr/email/fax sent
From: Mojica, Jeannie [KMA]
Sent: Wednesday, May 13, [REDACTED] 0:56 AM
To: Childery, Stormy [KMA]; [REDACTED]
Subject: RE: LETTER AND PICS K [REDACTED] 38 BAILEY

Stormy,

I got them! Thank you so much!

Javier,

I spoke to Mr. Maloney and informed him that we do have a tentative non-destructive inspection scheduled for 5/15/15.

Thank you,

*** PHONE LOG 05/13/ [REDACTED] 9:58:18 AM (Local Time) JMOjica Action Type: Ltr/email/fax rec'd
From: tim maloney [mailto:[REDACTED]]
Sent: Wednesday, May 13, 2015 10:51 AM
To: Mojica, Jeannie [KMA]; Margie Lopez
Subject: Re: Kia Case #: K [REDACTED] 38

thanks for email. regarding photos, if no resolution can be had, then of course we will request during litigation. hopefully this matter will not spin off into something major.

*** PHONE LOG 05/18/ [REDACTED] 2:54:08 PM (Local Time) JMOjica Action Type: Ltr/email/fax sent
From: Mojica, Jeannie [KMA]
Sent: Monday, May 18, 2015 1:54 PM
To: 'tim maloney'; Margie Lopez
Subject: RE: Kia Case #: K [REDACTED] 38

Tim,

I wanted to inform you that my engineer was unable to inspect the vehicle on 5/15/15. Once we have a new date, I will make sure to let you know.

Thank you,

Case History

*** PHONE LOG 05/27/ [REDACTED] 1:04:50 PM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: [REDACTED] (mailto:[REDACTED])
Sent: Wednesday, May 20, [REDACTED] 56 AM
To: Mojica, Jeannie [KMA]
Cc: Childery, Stormy [KMA]
Subject: RE: LETTER AND PICS K [REDACTED]

Good morning I spoke to Eric the engineer that is supposed to inspect this vehicle and he has no eta as per the inspection. Jeanne per your request I have placed this lady in a loaner but loaners are not intended for long periods of time I need our loaner back. Furthermore, this lady has retained an attorney and we can not contact her directly so this complicates things as far as getting the loaner back. Please assist.

*** PHONE LOG 05/27/ [REDACTED] 1:06:10 PM (Local Time) JMoJica Action Type: Ltr/email/fax sent
From: Mojica, Jeannie [KMA]
Sent: Wednesday, May 27, [REDACTED] 06 PM
To: [REDACTED]
Cc: Childery, Stormy [KMA]
Subject: RE: LETTER AND PICS K [REDACTED]

Javier,

I am sorry that my engineer was not able to complete the inspection. I cannot talk to the customer either, but I will see what I can do about the loaner situation. I am sorry, I didn't know it was going to go this route.

*** PHONE LOG 06/01/ [REDACTED] 1:48:17 AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: tim maloney (mailto:[REDACTED])
Sent: Saturday, May 30, [REDACTED] 2:32 PM
To: Mojica, Jeannie [KMA]
Subject: Re: Kia Case #: K [REDACTED] 38

where are we on this?

*** PHONE LOG 06/02/ [REDACTED] 2:02:19 PM (Local Time) WBurks Action Type: Incoming call
cust stated:
1. My car burned down
2. I do not have a VIN on me

writer locates by phone #

writer stated:
1. Showing a case open
2. Can you hold while I reach CSR or her VM

cust stated:
1. Yes

writer transfers to CSR VM

*** PHONE LOG 06/03/ [REDACTED] 1:48:00 AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: tim maloney (mailto:[REDACTED])
Sent: Wednesday, June 03, [REDACTED] 17 AM
To: Mojica, Jeannie [KMA]
Subject: Re: Kia Case #: K [REDACTED] 38

I have sent a previous email this week asking for status. Since we have not heard from you, we have no choice but to file suit.

*** PHONE LOG 06/03/ [REDACTED] 1:55:37 AM (Local Time) JMoJica Action Type: Outgoing call
Wtr left VM for SM Javier:
1. Informed SM that inspection has been scheduled for 6/24/15.
2. Has customer returned loaner?
3. I am going to reach out to the atty so I wanted to know beforehand.
4. Anyway, please c/b or email.

*** PHONE LOG [REDACTED] AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: Mojica, Jeannie [KMA]
Sent: Wednesday, June 03, [REDACTED] 2:57 PM
To: 'tim maloney'
Subject: RE: Kia Case #: K [REDACTED] 38

Tim,

Case History

I apologize for the delay in my response. My engineer has provided me with a new date for the vehicle inspection. My engineer will be inspecting the vehicle at Ancira Kia on 6/24/15.

Thank you,

*** CASE PRIORITY CHANGED 06/03/ [REDACTED] 10:58:19 AM (Local Time) JMoJica
from priority Escalated to priority Standard

*** PHONE LOG [REDACTED] AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: tim maloney [mailto:[REDACTED]]
Sent: Friday, June 05, [REDACTED] 2:33 PM
To: Mojica, Jeannie [KMA]
Subject: Re: Kia Case #: K [REDACTED] 38

The problem is my client is making car payments. Need to get this worked out, sooner than June 26th

*** PHONE LOG 06/23/ [REDACTED] 10:13:38 AM (Local Time) JMoJica Action Type: Ltr/email/fax sent
From: Mojica, Jeannie [KMA]
Sent: Tuesday, June 23, [REDACTED] 1:13 AM
To: 'tim maloney'
Subject: RE: Kia Case #: K [REDACTED] 38

Tim,

I apologize for the delay. My engineers are normally scheduled a few weeks out and 6/24/15 was the next available. Anyway, he will be at the dealership tomorrow at 8:30am.

Thank you,

*** PHONE LOG [REDACTED] AM (Local Time) JMoJica Action Type: Outgoing call
Wtr spoke to SM Javier:
1. Wtr informed SM that inspection will take place tomorrow at 8:30am.
2. Wtr will have loaner returned after inspection regardless of results.
3. SM said thanks for getting back to me. I will wait for your call after VI.
4. Wtr thanked and disconnected.

*** NOTES 06/30/ [REDACTED] 3:48:42 PM (Local Time) JMoJica Action Type: Internal
TREAD review complete.

*** PHONE LOG 07/01/ [REDACTED] 3:03:59 AM (Local Time) JMoJica Action Type: Incoming call
Customer left VM:
1. I wanted to see if you had any info for me.
2. I know the car was inspected last week.
3. Please call me back.

*** PHONE LOG 07/06/ [REDACTED] 3:28:35 AM (Local Time) JMoJica Action Type: Outgoing call
Wtr spoke to Monica in finance dept at TX002:
1. Wtr requested copy of sales contract.
2. Monica stated this is in storage, will have to go get it and send it over.
3. Wtr provided email address, fax #, and c/b #.

*** PHONE LOG 07/06/ [REDACTED] 3:28:53 AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: tim maloney [mailto:[REDACTED]]
Sent: Monday, July 06, [REDACTED] 22 AM
To: Mojica, Jeannie [KMA]
Subject: Re: Kia Case #: K [REDACTED] 38

Please be advised that I have been instructed to file suit in this matter. We have repeatedly tried to work with you in this matter, and you have repeatedly delayed and obfuscated. Situations handled like this are how small cases become big ones.

*** PHONE LOG 07/06/ [REDACTED] 3:33:16 AM (Local Time) JeffStroup Action Type: Outgoing call
wtr left voicemail for atty to call back.

*** PHONE LOG 07/06/ [REDACTED] 9:15:13 AM (Local Time) JeffStroup Action Type: Incoming call
atty left voicemail for wtr to call back

*** PHONE LOG 07/06/ [REDACTED] 9:29:41 AM (Local Time) JeffStroup Action Type: Outgoing call
wtr spoke with atty:
1. apologized for delays as vehicle was inspected last week
2. from the inspection, KMA would like to perform SOC
3. atty asked wtr how SOC works
4. wtr advised of SOC

Case History

5. atty stated customer no longer wishes to have Kia vehicle and wanted repurchase

6. wtr advised we are working on getting a copy of the sales contract

7. please send copy of sales contract for review of request.

[REDACTED] JMoJica Action Type: Ltr/email/fax rec'd

We sent a request for the findings and access to my clients vehicle. We need an update immediately. We are trying to avoid filing suit, but if the only way to obtain this information is through litigation, then so be it.

[REDACTED] JMoJica Action Type: Web Contact

[REDACTED] the vehicle is probably in the car. Also we would request a copy of the engineers report on [REDACTED] and will forward.

[REDACTED] Local Time) JMoJica Action Type: Ltr/email/fax sent

I have attached a two option offer to this email. As you advised, the customers copy of the sales contract was probably lost in the vehicle; we were able to receive figures from the dealership. Kia Motors does not have a report as this was a visual inspection. I also understand your client is in a dealer loaner vehicle; the dealership is requesting to have the customer return the loaner and pick up an Enterprise rental vehicle in which Kia Motors would be responsible for the associated fees (minus gas and insurance). Please review the offer letter and advise if you have any questions.

Thank you,

[REDACTED] JMoJica Action Type: Ltr/email/fax sent

[REDACTED] follow up in reference to the below.

Thank you,

*** PHONE LOG 07/20/2011 1:43:09 AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd

From: [REDACTED] <mailto:[REDACTED]> [mailto:[REDACTED]]

Sent: Thursday, July 16, 2011 7:07 AM

To: Mojica, Jeannie [KMA]

Cc: Childery, Stormy [KMA]

Subject: K [REDACTED] 38 BAILEY

IN REGARDS TO CASE# K [REDACTED] 38 BAILEY, WHAT HAS KIA DECIDED TO DO?

I need to know which direction to go with this vehicle.

This person is still in a vehicle at 30.00 per day the cost is substantial roughly 2100.00 in reimbursement.

JAVIER GOMEZ

PARTS AND SERVICE DIRECTOR

ANCIRA KIA

5720 NW LOOP 410

WWW.ANCIRAKIASA.COM <http://WWW.ANCIRAKIASA.COM>

*** PHONE LOG 07/20/2011 1:43:22 AM (Local Time) JMoJica Action Type: Ltr/email/fax sent

From: Mojica, Jeannie [KMA]

Sent: Monday, July 20, 2011 2:42 PM

To: [REDACTED]

Ca
Cc
Su
Jav

We have been working on getting your vehicle back to the dealer. Unfortunately, as you know, we are unable to make direct contact with the customer and the attorney has not gotten back to us.

*** PHONE LOG 07/20/2011 12:44:35 AM (Local Time) JMoJica Action Type: Ltr/email/fax sent
From: Mojica, Jeannie [KMA]
Sent: Monday, July 20, 2011 12:44 PM

purchase or replacement. The offer letter has already gone out. We are waiting to hear back from the attorney on their decision.

*** PHONE LOG 07/23/2011 1:00:25 PM (Local Time) JMoijca Action Type: Ltr/email/fax rec'd

Sorry been traveling for work. Heres my thought. My client bought a Car from KIA that Caught on FIRE! Luckily she got out. Pursuant to NHTSA this has happened before. I would assume a a simple forensic forensic inspection would reveal the cause and origin. To avoid all of this i would propose the Following. Get her a car. It can have some miles on it but u owe her a Car. Free and clear. Can be same year and miles. It is a good deal for KIA. Take a small problem and make it go away. If not, no Telling where this goes.

Sent from my iPhone

to your client and send us the signed offer

tomorrow.

*** PHONE LOG 07/30/2014 7:59:40 AM (Local Time) JeffStroup Action Type: Ltr/email/fax sent Tim.

Kia did offer to replace your clients vehicle in our offer letter dated July 9th. Since that offer has expired, I have extended the same two options until

Case History

August 11th.

Once again, I do understand your client is currently in a dealership loaner vehicle; the dealership is requesting to have the customer return the loaner and pick up an Enterprise rental vehicle in which Kia Motors would be responsible for the associated fees (minus gas and insurance). Your client has been in the dealer loaner vehicle for approximately 1 month and the vehicle needs to be returned.

If your client does not return the loaner vehicle and obtain an Enterprise rental vehicle and accept Kia's offer, I would then need to refer your client to their insurance company and your client will need to return the loaner vehicle or they may be charged fees as KMA will no longer be paying for those fees. Please advise if you have any questions.

Thank you,

*** PHONE LOG 07/30/ [REDACTED] 3:57:46 PM (Local Time) JeffStroup Action Type: Ltr/email/fax rec'd
Sorry heading into deposition. So are basically you are offering her nothing for what she has been through?

*** PHONE LOG 07/30/ [REDACTED] 3:58:49 PM (Local Time) JeffStroup Action Type: Ltr/email/fax sent
Tim,

We do apologize for any concerns that your client has experienced. However, we have offered two options for your client to choose from.

Thank you,

*** PHONE LOG 08/04/ [REDACTED] 3:58:18 AM (Local Time) JMojica Action Type: Ltr/email/fax rec'd
From: [REDACTED] (mailto:[REDACTED])
Sent: Monday, August 03, [REDACTED] 13 AM
To: Mojica, Jeannie [KMA]
Cc: Childery, Stormy [KMA]
Subject: BAILEY

[REDACTED] Saturday Aug,01 2015, which she stated was at your instruction.

[REDACTED] on Type: Ltr/email/fax sent

Yes, Javier.

Thank you for your patience. We are trying to work with her attorney, but as of today, the customer still has not accepted Kia's offer which is valid through 8/11/15.

Thank you,

[REDACTED]
Sent from my iPhone

*** PHONE LOG 08/05/ [REDACTED] 1:37:10 AM (Local Time) JeffStroup Action Type: Ltr/email/fax sent
Tim,

I understand your client has returned the loaner vehicle and been placed into an Enterprise rental vehicle. The offer letters dated July 9th and July 30th will be the only offers at this time. The offer is valid through August 11th; if your client does not accept the offer, Kia Motors America will not authorize payment on the rental vehicle past August 11th. If you have any questions, please let me know.

Thank you,

*** PHONE LOG [REDACTED] PM (Local Time) JeffStroup Action Type: Ltr/email/fax rec'd
I will inform my client and advise accordingly. I assume the vehicle is still available for inspection as I sent correspondence requesting that it be retained. Under Texas law, you are under a duty to retain evidence after being put on notice.

*** PHONE LOG 08/05/ [REDACTED] 2:53:41 PM (Local Time) JeffStroup Action Type: Ltr/email/fax sent
Tim,

Case History

Kia Motors America is not in possession of the vehicle. If you intend or intended to bring a claim against Kia as an entity, we believe you are obligated to preserve the subject vehicle, including any and all of its component parts in its immediate, post-incident condition, and that the vehicle remain intact, unchanged, and protected from the elements during the pendency of this matter, in order to avoid any potential claim Kia may otherwise have for spoliation of this key evidence.

Thank you,

*** PHONE LOG 08/06/2015 7:39:18 AM (Local Time) JeffStroup Action Type: Ltr/email/fax rec'd
Since you guys inspected it, I have no idea where you put it. Got a call into the client. Maybe she took it home.

*** PHONE LOG 08/12/2015 3:44:25 PM (Local Time) JMojica Action Type: Ltr/email/fax rec'd
From: tim maloney [mailto:]
Sent: Tuesday, August 11, 2015 3:36 AM
To: Stroup, Jeff [KMA]; Mojica, Jeannie [KMA]
Subject: Re: Kia Case #: K 38

my client will accept a substitution of collateral.

*** PHONE LOG 08/29/2015 1:53:47 AM (Local Time) JMojica Action Type: Ltr/email/fax sent
From: Mojica, Jeannie [KMA]
Sent: Saturday, August 29, 2015 2:54 PM
To: 'tim maloney'; Stroup, Jeff [KMA]
Subject: RE: Kia Case #: K 38

Tim,

We have yet to receive the signed offer letter. Can you please make sure to send it asap so we can proceed? Thank you.

*** PHONE LOG 09/08/2015 2:25:48 PM (Local Time) JMojica Action Type: Ltr/email/fax rec'd
From: tim maloney [mailto:]
Sent: Tuesday, September 08, 2015 14 AM
To: Mojica, Jeannie [KMA]
Subject: Re: Kia Case #: K 38

Client coming in today to sign agreement

*** PHONE LOG 09/08/2015 2:27:36 PM (Local Time) JMojica Action Type: Ltr/email/fax rec'd
A fax has arrived from remote ID "

9/8/2015 06:32 PM Transmission Record
Received from remote ID:
Inbound user ID KMACA-RIGHTFAX, routing code 0
Result: (0/352/0/0) Successful Send
Page record: 1 - 3
Elapsed time: 01:24 on channel 0

*** PHONE LOG 09/09/2015 1:44:27 PM (Local Time) JeffStroup Action Type: Outgoing call
wt spoke with atty Tim
1. atty is unavailable but will be available in 40 minutes
2. wtr advised will contact him back in 40 minutes as we need to come to a resolution for his client.

*** NOTES 09/09/2015 1:44:27 PM (Local Time) JeffStroup Action Type: Dealer contact
wtr spoke with attorney
1. atty will have customer go pick out like vehicle
2. customer is currently with KMF for financing.

*** PHONE LOG 09/14/2015 1:14:16 PM (Local Time) JMojica Action Type: Ltr/email/fax rec'd
-----Original Message-----
From: [mailto:]
Sent: Monday, September 14, 2015 1:38 PM
To: Mojica, Jeannie [KMA]
Cc: Childery, Stormy [KMA]
Subject: IN REGARDS TO CAS

Please give me an update on the vehicle. It is still in a rental and it is now been 45 DAYS at \$1452.15 to this point.

JAVIER GOMEZ
PARTS AND SERVICE DIRECTOR
ANCIRA KIA

Case History

*** PHONE LOG 09/14/ [REDACTED] 1:19:52 PM (Local Time) JMoJica Action Type: Outgoing call
Wtr left msg for atty Tim Maloney (atty on the other line) requesting c/b.

*** PHONE LOG 09/14/ [REDACTED] 1:20:03 PM (Local Time) JMoJica Action Type: Ltr/email/fax sent

Thank you so much for your patience. We finally received the signed docs from the customer's attorney. She is in the process of selecting the replacement vehicle. I will have her return the rental asap.

Thank you,

*** PHONE LOG 09/21/ [REDACTED] 3:49:33 PM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd

From: tim maloney [mailto:[REDACTED]]
Sent: Monday, September 21, [REDACTED] 34 AM
To: Mojica, Jeannie [KMA]
Subject: vin number

knd5n2a28 [REDACTED] 21 for kia for tonya bailey

*** PHONE LOG 09/21/ [REDACTED] 3:52:56 PM (Local Time) JMoJica Action Type: Ltr/email/fax sent

From: Mojica, Jeannie [KMA]
Sent: Monday, September 21, [REDACTED] 53 PM
To: 'tim maloney'
Cc: Stroup, Jeff [KMA]
Subject: Kia Case #: K [REDACTED] 38

Tim,

That is not a valid VIN. Please send me a valid VIN asap so we can finally move forward.

Thank you,

*** PHONE LOG 09/30/ [REDACTED] 7:55:37 AM (Local Time) JMoJica Action Type: Incoming call

Ms. Bailey left VM:

1. I got word on Friday that you are no longer paying my rental.
2. Please contact me or my lawyer.
3. I didn't even get a warning.

*** PHONE LOG 09/30/ [REDACTED] 9:50:08 AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd

From: tim maloney [mailto:[REDACTED]]
Sent: Tuesday, September 22, [REDACTED] 58 PM
To: Mojica, Jeannie [KMA]
Subject: (CONTENT) vin

Yes, we have stopped paying for your clients rental vehicle as it has been approximately 3 months since we made our offer for a substitution of collateral. We received the VIN for the new vehicle on, or around, September 22. You and I had conversation around July 30th in which we need to obtain your clients lien holder information so we can contact them in reference to the substitution. I am attaching it to this email so it can be filled out and returned. Once we receive this back from your client, we can discuss moving forward with the substitution of collateral. Once we receive the lien holder information, I believe the transaction should take approximately 2 weeks to complete.

Case History

Thank you,

*** PHONE LOG 10/01/ [REDACTED] 2:37:44 PM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: tim maloney [mailto:[REDACTED]]
Sent: Wednesday, September 30, 2015 12:21 PM
To: Stroup, Jeff [KMA]
Subject: Re: Automatic reply: vin number

Jeff the problem is she is now incurring expenses through no fault of her own; Yes it takes time to gets pre-litigation matters resolved; however let us not loose sight of the fact that the car you sold her BURNED UP! We are too close to getting this done; she can't afford a rent car, she needs to get to work. Come on dude, no malice intended here. A couple weeks in a rent car?

*** PHONE LOG 10/01/ [REDACTED] 2:37:58 PM (Local Time) JMoJica Action Type: Ltr/email/fax sent
From: Stroup, Jeff [KMA]
Sent: Thursday, October 01, [REDACTED] 37 PM
To: tim maloney
Cc: Mojica, Jeannie [KMA]
Subject: RE: Automatic reply: vin number

Tim,

If your client returns the loan information worksheet filled out so we can proceed and come to a resolution, most likely I will offer the rental vehicle. Again, this situation usually takes approximately 30 days to come to a complete resolution while we are at approximately 90 days so far.

*** PHONE LOG 10/12/ [REDACTED] 1:22:56 PM (Local Time) JMoJica Action Type: Outgoing call
Wtr attempted to contact lender:
1. Wtr was forwarded to Recover team.
2. Wtr attempted to leave VM, but VM box was full.

*** PHONE LOG 10/12/ [REDACTED] 3:07:21 PM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: Norma Uriegas [mailto:[REDACTED]]
Sent: Friday, October 02, [REDACTED] 54 PM
To: Mojica, Jeannie [KMA]
Subject: Tonya Bailey Authorization to Release

Jeff: I have attached the Authorization to Release the Loan. Mrs. Bailey is asking that you please contact Enterprise and speak to Matt at [REDACTED] so that you can cover the rental for her.

Thank you for your assistance,

Norma Uriegas
Legal Assistant to Tim Maloney
926 South Alamo
San Antonio, Texas [REDACTED]

[REDACTED] Telephone
[REDACTED] Facsimile

Email: [REDACTED] <mailto:[REDACTED]>

*** PHONE LOG 10/13/ [REDACTED] 3:27:53 AM (Local Time) JMoJica Action Type: Outgoing call
Wtr spoke to Rodney at Capital One [REDACTED]:
1. Wtr provided acct #: [REDACTED] 57
2. Agent stated there is a big issue on this account, we need to speak to the consumer directly, I can't tell you why.
3. Wtr advised of Auth to Release Loan info.
4. Agent stated can't release info until speaking directly with customer.
5. Wtr thanked and disconnected.

*** PHONE LOG [REDACTED] AM (Local Time) JMoJica Action Type: Ltr/email/fax sent
From: Stroup, Jeff [KMA]
Sent: Tuesday, October 13, [REDACTED] 0:19 AM
To: tim maloney
Cc: Mojica, Jeannie [KMA]
Subject: RE: Automatic reply: vin number

Tim,

It took us a few tries but were finally able to speak with the lender. They advised there are concerns with your clients account and will not authorize the SOC at this time. They advised they need to speak with your client directly. Please have your client contact Capital One and see if they can clear up any

Case History

of the concerns. Once your client has spoken with Capital One, please advise of the outcome so we can determine next steps.

Thank you,

*** PHONE LOG 10/14/ [REDACTED] 10:36:13 AM (Local Time) JMoJica Action Type: Ltr/email/fax sent
Wtr faxed auth to rel. loan info to bank yesterday

*** PHONE LOG 10/14/ [REDACTED] 10:38:21 AM (Local Time) JMoJica Action Type: Outgoing call
Wtr spoke to Jesse at Capital One:
1. Jesse stated it looks like customer did call in yesterday.
2. Jesses stated they are requesting auth from cust to talk to Kia about account.
3. Wtr informed Jesse that loan auth doc was faxed yesterday.
4. Jesses stated it takes up to 48 hours to show receipt of fax in system and recommended that wtr c/b tomorrow.

*** PHONE LOG 10/15/ [REDACTED] 1:14:25 PM (Local Time) JMoJica Action Type: Outgoing call
Wtr spoke to John at Capital One:
1. John stated paperwork was received.
2. John stated wtr will need to fax Request for SOC to [REDACTED] or speak to area sales manager.
3. Wtr thanked and disconnected.

*** PHONE LOG 10/23/ [REDACTED] 2:58:50 PM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
Wtr faxed dealer invoices and copy of signed offer letter to Capital One auto finance.

*** PHONE LOG 10/26/ [REDACTED] 7:28:14 AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: [REDACTED] <mailto:[REDACTED]> [mailto:[REDACTED]]
Sent: Monday, October 26, [REDACTED] 23 AM
To: Mojica, Jeannie [KMA]
Cc: Childery, Stormy [KMA]
Subject: IN REGARDS TO CASE# [REDACTED]

JUST AN FYI,
Enterprise is seeking update on re [REDACTED] in the rental 87 days=\$2807.49 as of today.

JAVIER GOMEZ
PARTS AND SERVICE DIRECTOR
ANCIRA KIA
5720 NW LOOP 410
[REDACTED]
WWW.ANCIRAKIASA.COM <http://WWW.ANCIRAKIASA.COM>

*** PHONE LOG 10/26/ [REDACTED] 7:28:23 AM (Local Time) JMoJica Action Type: Ltr/email/fax sent
From: Mojica, Jeannie [KMA]
Sent: Monday, October 26, [REDACTED] 28 AM
To: [REDACTED]
Cc: Childery, Stormy [KMA]
Subject: RE: IN REGARDS TO CASE# [REDACTED]

Javier,

According to her attorney, she returned the rental on or around 9/30 because Enterprise was asking for the vehicle back. Please confirm?

*** PHONE LOG 10/27/ [REDACTED] 9:42:24 AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: [REDACTED] [mailto:[REDACTED]]
Sent: Monday, October 26, [REDACTED] 43 AM
To: Mojica, Jeannie [KMA]
Cc: Childery, Stormy [KMA]
Subject: RE: IN REGARDS TO CASE# K [REDACTED] 38 BAILEY

I just spoke to Enterprise and she is still in a rental.

*** PHONE LOG 10/29/ [REDACTED] 7:55:03 AM (Local Time) JMoJica Action Type: Outgoing call
Wtr spoke to Director of Finance, Phillip Espinoza:
1. Wtr informed DF that Tradeout Auth will need to be sent over according to dlr fees.
2. DF stated:
-Title fee: \$33
-Dlr doc fee: \$143
-License fee: \$148.50
-GAP: \$451.84
-Antitheft: \$149
-Deputy Fee: \$10

Case History

-Safety inspection: \$182.75

-Customer rebate: \$1,000

-Holdback: \$522

3 [REDACTED]

*** PHONE LOG 11/12/ [REDACTED] 1:42:08 PM (Local Time) JMoJica Action Type: Outgoing call

From: Mojica, Jeannie [KMA]

Sent: Thursday, October 29, [REDACTED] 58 AM

To: [REDACTED]

Subject: Bailey-K [REDACTED] Soul

Fil,

Please see the doc attached that needs to be signed and returned to me. Let me know if you have any questions.

Thank you,

*** PHONE LOG 11/13/ [REDACTED] 2:22:26 PM (Local Time) REwards Action Type: Incoming call

Customer called and states

1. Trying to get a hold of my case worker
2. she will not call me back
3. she wont call my lawyer back
4. i love my car
5. but i hate KIA right now

Writer states

1. Looks like you case is at NCA
2. i can transfer you to your case workers line
3. if un available will get you to her VM

Caller thanked and was transferred to JMoJica VM

*** PHONE LOG 11/13/ [REDACTED] 4:34:44 PM (Local Time) JMoJica Action Type: Ltr/email/fax sent

From: Mojica, Jeannie [KMA]

Sent: Friday, November 13, [REDACTED] 35 PM

To: [REDACTED]

Cc: Stroup, Jeff [KMA]

Subject: Kia Case #: K [REDACTED] 38

Tim,

The vehicle [REDACTED] used for auto shows and is now wrapped in a Comic Con theme and will tour throughout the U.S.

Do you want [REDACTED] the vehicle or does she want to proceed with the SOC? Obviously, she would have to pick out another vehicle.

Thank you,

*** PHONE LOG 11/16/ [REDACTED] 3:13:42 PM (Local Time) AGrantha Action Type: Incoming call

Customer called and states: Mrs. Bailey

1. Offered case#
2. Need someone higher,
3. Understand veh was sold
4. Cust states know that lawyer was to take care of this but
5. Need to speak to the boss of NCAA

Writer states:

1. Apologized for the concerns
2. Advised NCAA is managing case
3. Writer is not aware of an escalation process beyond to an NCAA
4. After a Lawyer is involved the lawyer will need to be in direct contact with NCAA
5. Writer can note this request in the case, and connect to NCAA

Customer states:

1. Last time called the corporate office was connected with
2. Not going to pay for rental. Very upset
3. Previous contact attempts have been unsuccessful

Writer states:

1. Understand, will be connecting to NCAA
2. If there is further escalation available then it can be taken by the NCAA
3. This office does not have authority over NCAA regarding case management

Cust states:

1. Agreed to contact with NCAA

Case History

Writer placed call on hold in order to connect
-----cust disconnected call--

*** PHONE LOG 11/17/ [REDACTED] 7:40:12 AM (Local Time) JMoJica Action Type: Incoming call
Filip at dlr left VM requesting c/b at [REDACTED]

*** PHONE LOG 11/17/ [REDACTED] 3:16:46 AM (Local Time) JMoJica Action Type: Ltr/email/fax rec'd
From: tim maloney [mailto:[REDACTED]]
Sent: Monday, November 16, [REDACTED] 10:06 AM
To: Mojica, Jeannie [KMA]
Cc: Stroup, Jeff [KMA]
Subject: Re: Kia Case #: K [REDACTED] 38

Obviously this has reached the point of absurdity, and is now bordering on the malicious. I will tell her to go to the dealership, however last time there she was told they would not talk to her. Reach out to them and get this done today.

*** PHONE LOG 11/17/ [REDACTED] 3:23:57 AM (Local Time) JMoJica Action Type: Outgoing call
Wtr spoke to Filip:
1. Filip will reach out to customer to ask her to come in and pick out a another like veh.

*** PHONE LOG 11/17/ [REDACTED] 3:24:09 AM (Local Time) JMoJica Action Type: Ltr/email/fax sent
From: Mojica, Jeannie [KMA]
Sent: Tuesday, November 17, [REDACTED] 23 AM
To: 'tim maloney'
Cc: Stroup, Jeff [KMA]
Subject: RE: Kia Case #: K [REDACTED] 38

Tim,

The dealership has never been advised not to speak to Ms. Bailey. I have spoken to Filip and he is going to reach out to Ms. Bailey.

Also [REDACTED] Kia requesting that I or Jeff contact her. Just FYI.

Tha [REDACTED]

*** NOTES 11/17/ [REDACTED] 1:00:11 PM (Local Time) JeffStroup Action Type: Dealer contact
DPSM contacted wtr to speak with enterprise
1. wtr spoke with Matt at [REDACTED]
2. rental bill as of today is \$3275.17

*** NOTES 11/25/ [REDACTED] 2:12:29 PM (Local Time) JeffStroup Action Type: Dealer contact
customer went to dlr and picked out new VIN
1. wtr working with capital one in reference to new SOC documents

*** PHONE LOG 12/03/ [REDACTED] 3:20:00 PM (Local Time) JMoJica Action Type: Ltr/email/fax sent
From: Stroup, Jeff [KMA]
Sent: Wednesday, December 02, [REDACTED] 39 PM
To: [REDACTED]
Cc: Mojica, Jeannie [KMA]
Subject: RE: Fwd [REDACTED]

We have spoken with Capital One who has received all the documents to process the transaction. I also left a voicemail for Adriana to call me back so I can confirm with her that her main office received documents. I understand you should be receiving both bank docs and Kia docs by Friday. Once you receive both sets of documents, please contact Jeannie or myself so we can run over the documents before the customer signs them.

Thank you,

*** PHONE LOG 12/03/ [REDACTED] 3:20:21 PM (Local Time) JMoJica Action Type: Ltr/email/fax sent
Wtr sent docs via FedEx: [REDACTED] 33

Attachments to Case:

File Name	Location
Bailey-K [REDACTED] 38 Picture.pdf	\\copubs\ClarifyObj\CA
Bailey-K [REDACTED] 38 Carfax.pdf	\\copubs\ClarifyObj\CA
Bailey-K [REDACTED] 38 ADL.pdf	\\copubs\ClarifyObj\CA
Bailey-K [REDACTED] 38 Pictures 2.pdf	\\copubs\ClarifyObj\CA
Bailey-K [REDACTED] 38 F&I.pdf	\\copubs\ClarifyObj\CA

Case History

Bailey-K 38 Offer Letter.pdf
Bailey-K 38 Lender Info.pdf
Bailey-K 38 Signed OL.pdf
Bailey-K 38 SOC Fax.pdf
Bailey-K 38 Tradeout Auth..pdf
Bailey-K 38 Signed SOC Docs.pdf

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*****End Case Report K 38 *****

Accident Report

Case K [REDACTED] 38

Report Details

*** End ***

1. Who Owns the Vehicle?

<Provide Owner Name, Address, and Phone>

[REDACTED]

2. Who Was Driving the Vehicle and how many passengers were there, if any?

<Provide Driver's Name, Address, and Phone>

Tonya Bailey, no passengers.

3. Do You Own the Vehicle?

Yes

4. What is the Age of the Driver?

5. What Was the Date and Time of the Accident?

<DATE> and <TIME>

5/06/15 at about 7:00 pm

6. Describe the Road Weather Conditions at the Time of the Accident.

<ROAD WEATHER CONDITIONS>

The car was parked.

7. What Speed was the Vehicle Traveling?

<VEHICLE SPEED>

N/a

8. Were any Other Vehicles Involved in the Accident?

No

9. Were There Any Injuries?

No

10. Was Anyone Taken by Ambulance to The Hospital?

No

11. Is Anyone Currently Under Medical Attention for this Incident?

No

12. Describe the Incident in Detail, including the approach

<INCLUDE street names, location, all vehicles involved, weather conditions, etc.>

I left my part time job last night. I was at a shopping center and I was speaking to a coworker. The car was off but I noticed that a [REDACTED] milky type of smoke was coming from the car and noticed that the area behind the steering wheel was [REDACTED] and called 911. I handed the phone to a lady to a [REDACTED]

I parked
en
ck at my
de the

13. Were the Police Contacted?

Yes

14. What is the Name of the Officer, Department, and Badge Number?

<Officer Name, Department, Badge>

The Fire Dept's case number 2 [REDACTED]-SASD. INC# [REDACTED] Phone number is [REDACTED]

15. What is the Police Report Number?

<POLICE REPORT NUMBER>

N/a

16. Was the Insurance Company Contacted?

No

18. Was the Vehicle Driven or Towed From the Scene?

Towed

19. Where is the Vehicle Now?

<VEHICLE LOCATION>

It's heading to Ancira Kia

20. Have Any Repairs Been Completed?

No

21. Were Parties Wearing Seatbelts?

Yes

22. Did the Airbag(s) Deploy?

No

23. Was Airbag Light on prior to accident?

No

24. What action are you requesting of Kia?

<RESOLUTION SOUGHT>

I want the car fix. The car is under warranty. I don't want to have to contact my insurance Co.

25. Have you reviewed the airbag section of the owners manual?

Yes - In order to consider your request, we will need you to provide us with copies of:

- i. Copy of Police Report (if available)
- ii. Pictures of vehicle (front, rear and side views)

Yes



K2942738



K2942738

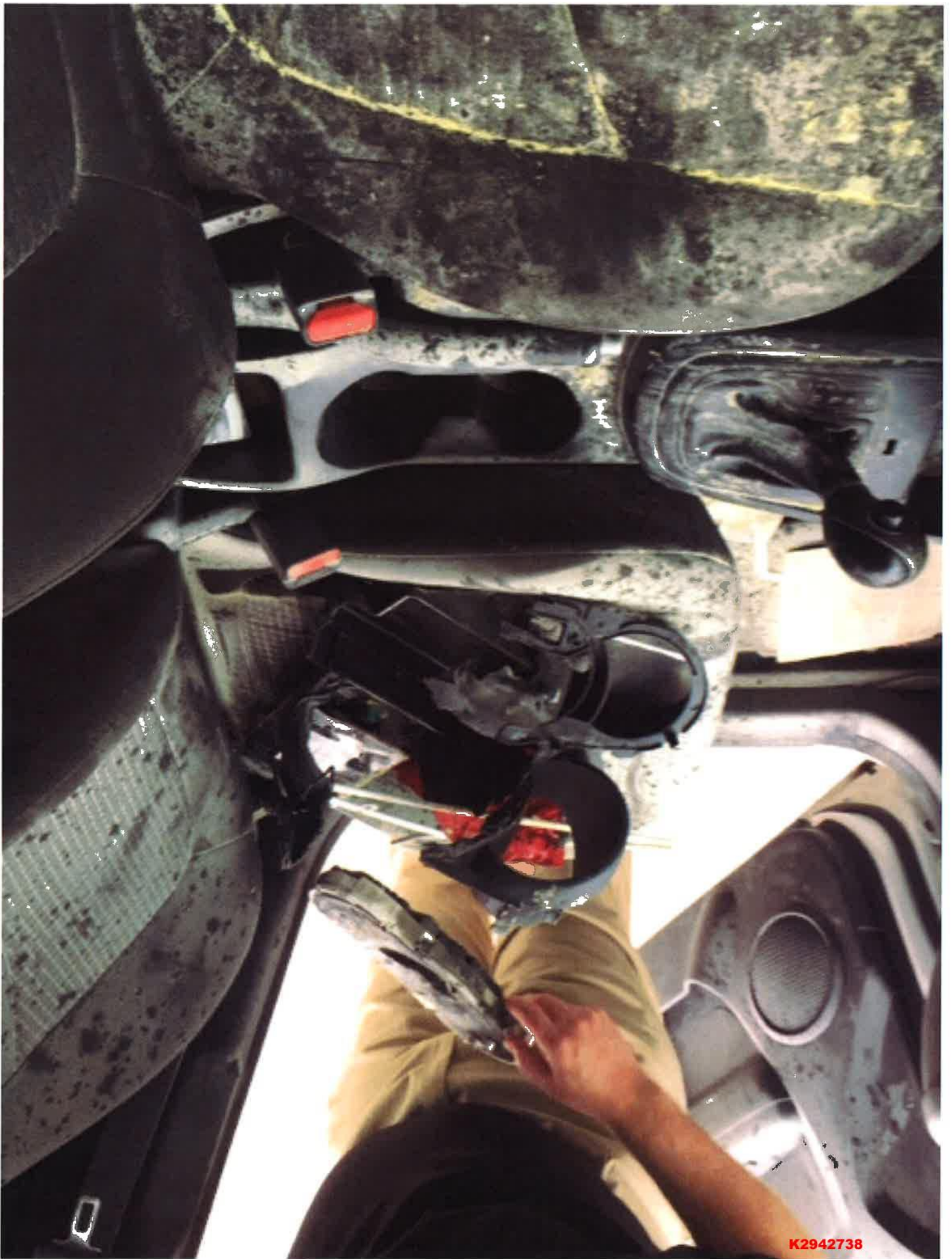




K2942738



K2942738



K2942738



K2942738

Upon sale of this vehicle, the purchaser must apply for a new title within 30 days unless the vehicle is purchased by a dealer. Until a new title is issued, the vehicle record will continue to reflect the owner's name listed on the current title. SEE BACK OF TAB FOR ADDITIONAL INFORMATION.

1213 of [REDACTED]



CAPITAL ONE AUTO FINANCE
7933 PRESTON RD
PLANO, TX [REDACTED]

AYS

0000846

K573291



TEXAS CERTIFICATE OF TITLE



TEXAS DEPARTMENT OF MOTOR VEHICLES

11491173

MAKE OF VEHICLE

KIA

BODY STYLE

4D

TITLE/DOCUMENT NUMBER

DATE TITLE ISSUED

LICENSE NUMBER

SOU

2700

BWZ9059

PREVIOUS OWNER

ODOMETER READING

17

ANCIRA VW SUBARU KIA SAN ANTONIO TX

OWNER

REMARK(S)

ACTUAL MILEAGE

SIGNATURE OF OWNER OR AGENT MUST BE IN INK

UNLESS OTHERWISE AUTHORIZED BY LAW, IT IS A VIOLATION OF STATE LAW TO SIGN THE NAME OF ANOTHER PERSON ON A CERTIFICATE OF TITLE OR OTHERWISE GIVE FALSE INFORMATION ON A CERTIFICATE OF TITLE

DATE OF LIEN

1ST LIENHOLDER

04/05/2013 CAPITAL ONE AUTO FINANCE
PO BOX 660068
SACRAMENTO, CA 95866-0068

DATE OF LIEN

2ND LIENHOLDER

DATE OF LIEN

3RD LIENHOLDER

3RD LIEN RELEASED

DATE

BY

AUTHORIZED AGENT

IT IS HEREBY CERTIFIED THAT THE PERSON HEREIN NAMED IS THE OWNER OF THE VEHICLE DESCRIBED ABOVE WHICH IS SUBJECT TO THE ABOVE LIENS.

RIGHTS OF SURVIVORSHIP AGREEMENT
WE, THE MARRIED PERSONS WHOSE SIGNATURES APPEAR HEREIN, HEREBY AGREE THAT THE OWNERSHIP OF THE VEHICLE DESCRIBED ON THIS CERTIFICATE OF TITLE SHALL FROM THIS DAY FORWARD BE HELD JOINTLY, AND IN THE EVENT OF DEATH OF ANY OF THE PERSONS NAMED IN THE AGREEMENT, THE OWNERSHIP OF THE VEHICLE SHALL VEST IN THE SURVIVOR(S).

SIGNATURE

DATE

SIGNATURE

DATE

SIGNATURE

DATE

Capital One Auto Finance
7933 Preston Rd
Plano TX [REDACTED]



12/28/2015

RE: VIN:
Vehicle Year/Make:

Thank you for using Capital One Auto Finance for your financial needs.

Enclosed is the title documentation that we had on file for your loan, unless you are registered in a state that uses an electronic method of storing titles. If that is the case, the title will be sent to you from the state. Please contact the state for processing times.

One of the following names may appear on record, which is a "one in the same" company, affiliate or a subsidiary Company where Capital One Auto Finance has rights to securing or to releasing interest on vehicle records. Please accept this as evidence and proof.

ABNI Corporation
American Bank
Argent Bank
Bank of Saint John
Bastrop National Bank
Bayside Federal Savings Bank
Beaumont Trust Company, National Association
Branford Savings Bank
Bunkie Bank & Trust Company
Calcasieu Marine National Bank of Lake Charles
Capital One Auto Finance
Capital One, FSB
Capital One, NA
Citizens Bank & Trust Company
Coastal Banc Savings Association
~~Coastal Banc, State Savings Bank~~
Coastal Bancorp
Coastal Banque
Coastal Bend S&La
Commercial National Bank
Continental Bank
CU Acceptance Corporation
Eastchester Savings Bank
Eastern Federal Savings and Loan
Evangeline Fs&La
Extebank
Fidelity National Bank

Fidelity National Bank of Baton Rouge
First Commercial Bank of Franklin
First Interstate Bank of Southern Louisiana
First Interstate Bank Southern Louisiana
First Metropolitan Bank
First National Bank
First National Bank in Mansfield
First National Bank of Jefferson Parish
First National Bank of Lake Providence
First National Bank of West Monroe
First Service Bank
First State Bank and Trust Company
First Svg Louisiana Fsa
Guaranty Bank & Trust Company
Hamilton Savings Bank
~~Hibemia National Bank~~
Home Federal Savings Bank
Hub City Bank and Trust Com
Jamaica Savings Bank
Livingston Bank
Louisiana Bank & Trust Company
Metropolitan Bank of Jefferson
National Bank of Bossier City
National Fidelity Bank of Shreveport
NFB Funding Inc
North Fork Bank
North Fork Bank and Trust

North Side Savings Bank
Onyx Acceptance Corporation
Onyx Acceptance Financial Corporation
Onyx Acceptance Funding Corporation
PeopleFirst Finance, LLC
PeopleFirst, Inc
PeopleFirst.Com
Peoples Bank & Trust Company
Pioneer Bank & Trust Company
Progressive Bank and Trust Company
Reliance Savings Bank
Richmond Hill Savings Bank
River City FSB
Saint Bernard Bank & Trust Company
Shreveport Bank & Trust Company
~~Southern National Bank at Tallulah~~
Southold Savings Bank
Southwest NB of Lafayette
State Bank and Trust Company
Summit Acceptance Corporation
Superior Savings of New England, N. A.
Texarkana National Bank
Trust Company of New Jersey
Union Savings Bank
United Mercantile Bank \\\nWestbury Federal Savings and Loans

If you have any questions about your account please contact Capital One Auto Finance at [REDACTED]

Sincerely,

Capital One Auto Finance

Capital One Auto Finance is a division of Capital One, National Association, and services the following Capital One affiliated company: Onyx Acceptance Corporation.



KIA MOTORS

RELEASE OF TITLE

TO: Capital One Auto Finance

Loan No.:
Customer:
VIN:
Year/Model



THE UNDERSIGNED HEREBY AUTHORIZES AND DIRECTS YOU TO SURRENDER TO KIA MOTORS AMERICA, INC., OR ORDER, THE PROPERLY-ENDORSED CERTIFICATE OF OWNERSHIP TO THE ABOVE-DESCRIBED VEHICLE. THE CERTIFICATE OF OWNERSHIP, PROPERLY ENDORSED, MUST BE MAILED TO:

Name, National Consumer Affairs
Kia Motors America, Inc.
111 Peters Canyon Road
Irvine, CA



KIA VEHICLE TRADEOUT AUTHORIZATION

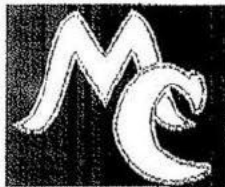
CUSTOMER: _____

DISTRICT: _____

DEALER CODE: _____

REPLACEMENT V _____

REPLACEMENT VEHICLE COSTS	
Dealer Invoice Price	\$ 17,772.00
PLUS: Dealer Doc Fees	\$ 143.00
PLUS: License Fees (Temp tag)	\$ 148.50
PLUS: Sales Tax on:	(a) \$
(a) \$ _____ OR	OR
(b) No sales tax is due (see attached certificate)	(b)
PLUS: Safety inspection, deputy fee, anti-theft	\$ 182.75
PLUS: Title Fee, <i>GAP?</i>	\$ 484.84
SUBTOTAL	\$ 18,731.00
LESS: Customer Rebate (As Applicable)	< \$ 500.00
LESS: Owner Loyalty (As Applicable)	< \$ 0.00
LESS: Holdback (As Applicable)	< \$ 522.00
LESS: Customer Contribution (if paid to dealer)	< \$
LESS: NEW LOAN TO BE FUNDED	< \$
LESS:	< \$
LESS: Other (i.e., Test Drive Incentive) (As Applicable)	< \$
TOTAL NEW VEHICLE COST:	\$ 18,293.50 + <i>Rental 17</i>



LAW OFFICES
OF
MALONEY & CAMPOLO, L.L.P.

TIM MALONEY*

PAUL E. CAMPOLO*

May 11, 2015

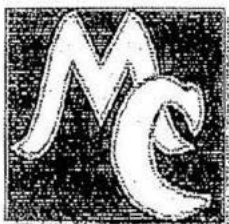
Please be advised that I have been contacted by Tonya Bailey regarding a 2013 Kia Soul. Apparently the ignition or some other component failed, causing extensive fire damage to the vehicle.

It is our understanding that the car is in your possession, and that a Representative may be coming from Kia in order to photograph the damage. We hereby request that no destructive testing be done on the vehicle and that any and all photographs that are taken, a copy be sent to our offices. Law Office of Maloney & Campolo.

Please direct any further correspondence or conversations to this office as I have instructed Ms. Bailey to forward any and all communications directly to myself.

Thank you very much for your anticipated cooperation.

926 S. Alamo, San Antonio, Texas
Telephone • Toll Free • Facsimile
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FACSIMILE TRANSMITTAL SHEET

DATE:	Monday, May 11, 2015			
TO:	[REDACTED]		FROM:	Margie Lopez, Paralegal
			On Behalf of Tim Maloney	
CC:		PAGES:	2	
		including this cover sheet		
RE:	Our Client:	[REDACTED]		
MESSAGE:				
Please see our letter of representation.				

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CARFAX® Vehicle History Report™

An independent company established in 1986

US \$39.99

Vehicle Information:
2013 KIA SOUL

Standard Equipment | Safety Options

CARFAX Report Provided By:
Kia Motors America
111 Peters Canyon Rd
Irvine, CA [REDACTED]

	No accident / damage reported to CARFAX
	CARFAX 1-Owner vehicle
	Personal vehicle
	Last owned in Texas
	17 Last reported odometer reading
	Worth \$150 more than retail book value



This CARFAX Vehicle History Report is based only on [information](#) supplied to CARFAX and available as of 5/8/15 at 12:44:36 PM (EDT). Other information about this vehicle, including problems, may not have been reported to CARFAX. Use this report as one important tool, along with a vehicle inspection and test drive, to make a better decision about your next used car.



Price Calculator™

Adjust the value of this 2013 Kia Soul based on the information available in this report

1) Retail Book Value	2) CARFAX Price Adjustment™	3) Adjusted Retail Value
\$ 0 Enter retail book value here	+ +\$150 Above retail book value	= Begin by entering the retail book value
 Start by entering the retail book value from a pricing guide website.	\$ This vehicle is worth more than average, based on information in this report.	🔍 Compare adjusted retail value to seller's asking price when making your decision.



Ownership History

Number of owners is estimated

	Owner 1
Purchased	2013
Type of owner	Personal
Estimated length of ownership	2 years
Owned in the following states/provinces	Texas
Estimated miles driven per year	---
Last reported odometer reading	17





Title History

CARFAX guarantees the information in this section

Owner 1

Salvage | Junk | Rebuilt | Fire | Flood | Hail | Lemon

Guaranteed
No Problem

Not Actual Mileage | Exceeds Mechanical Limits

Guaranteed
No Problem**GUARANTEED** - None of these major title problems were reported by a state Department of Motor Vehicles (DMV). If you find that any of these title problems were reported by a DMV and not included in this report, CARFAX will buy this vehicle back. [Register](#) | [View Terms](#)

Additional History

Not all accidents / issues are reported to CARFAX

Owner 1

Total Loss

No total loss reported to CARFAX.

No Issues Reported

Structural Damage

No structural damage reported to CARFAX.

No Issues Reported

Airbag Deployment

No airbag deployment reported to CARFAX.

No Issues Reported

Odometer Check

No indication of an odometer rollback.

No Issues Indicated

Accident / Damage

No accidents or damage reported to CARFAX.

No Issues Reported

Manufacturer Recall

No open recalls reported to CARFAX.

No Recalls Reported



Detailed History

[Glossary](#)

Owner 1

Purchased: 2013
 Type: Personal
 Where: Texas
 Est. length owned: 5/8/13 - present (2 years)

Date:	Mileage:	Source:	Comments:
05/08/2013	17	Texas Motor Vehicle Dept. San Antonio, TX Title # [REDACTED] 09	Title issued or updated First owner reported Titled or registered as personal vehicle Loan or lien reported Vehicle color noted as [REDACTED]



Avoid financial headaches. Make sure the **loan** has been paid off if you're buying from a private seller.

Have Questions? Consumers, please visit our Help Center at www.carfax.com. Dealers or Subscribers, please visit our Help Center at www.carfaxonline.com.



Glossary

[View Full Glossary](#)

CARFAX Price Adjustment™

Accidents, service records, number of owners and many other history factors can affect a vehicle's value. The CARFAX Price Adjustment is a tool that analyzes millions of used car transactions to measure how the combination of all the information reported to CARFAX affects the value of a particular vehicle. The vehicle's retail book value plus the CARFAX Price Adjustment will give you a more accurate measure of the vehicle's value. Use this tool, along with a vehicle inspection and test drive, to make a better decision about your next used car.

First Owner

When the first owner(s) obtains a title from a Department of Motor Vehicles as proof of ownership.

Ownership History

CARFAX defines an owner as an individual or business that possesses and uses a vehicle. Not all title transactions represent changes in ownership. To provide estimated number of owners, CARFAX proprietary technology analyzes all the events in a vehicle history. Estimated ownership is available for vehicles manufactured after 1991 and titled solely in the US including Puerto Rico. Dealers sometimes opt to take ownership of a vehicle and are required to in the following states: Maine, Massachusetts, New Jersey, Ohio, Oklahoma, Pennsylvania and South Dakota. Please consider this as you review a vehicle's estimated ownership history.

Title Issued

A state issues a title to provide a vehicle owner with proof of ownership. Each title has a unique number. Each title or registration record on a CARFAX report does not necessarily indicate a change in ownership. In Canada, a registration and bill of sale are used as proof of ownership.

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Covered by United States Patent Nos. 7,113,853; 7,778,841; 7,596,512; 8,600,823; 8,595,079; 8,606,648; 7,505,838.

5/8/15 12:44:36 PM (EDT)

1 DEAL # [REDACTED] 9 TRADE #1 1200.00 16 DOC FEE 143.00
2 DEAL DATE 04/05/2013 10 PAYOFF #1 17 WARR PREM 0.00
3 STOCK # K [REDACTED] 1 6 11 DEPOSIT 18 GAP PREM 451.84
12 CASH DOWN 0.00 (ENTER GAP PRODUCT)
4 PRICE [REDACTED] 00 13 REBATE 0.00
TOTAL AFTMKT 149.00 19 MSRP
5 TERM 72 14 REGISTERED STATE TX 20 BALLOON 0.00
GOVT FEES 131.00
6 RATE 18 TAXES 1039.05 21 PYMT DATE 05/10/2013
7 DAYS 35 15 EMAIL UNPAID BAL [REDACTED] 05
8 PAY/YEAR 12
SUBTOTAL [REDACTED] 05 LIFE:
AMOUNT FIN [REDACTED] 89 RO/PO #1 LEVEL:
RO/PO #2 A&H:
STATUS F RO/PO #3 IUI CO:

(LINE#)(M=MODIFY)(?=CMD LIST) NO CR
SHIFT F1=FKEYS BANK=CAPITAL ONE AUTO FIN MONTHLY PYMT () 406.26



Authorization To Release Loan/Lease Information

I hereby authorize my lienholder (lender), to release to Kia Motors America, Inc., or its representative, any requested information regarding my vehicle loan/lease including, but not limited to, the loan/lease payoff, interest information and the payment history.

Customer's Name

Lender's Name

Lender's Phone

Account #: _____

Last 4 of SSN

Date: 10.2.15 Customer's Signature

Return to: _____

Fax #: _____