21 November 2017

Federal Election Commission Office of Complaints Examination and Legal Administration Attn: Christal Dennis, Paralegal 999 E Street, NW Washington, DC 20436 <u>CELA@fec.gov</u>

Matter No. MUR 7293

Campaign Legal Center/Catherine Kinckley Kelley v. Zinke for Congress

Dear Federal Election Commission,

Please accept this letter as proof that no action should be taken against myself, F. Edward Buttrey, with regards to the above matter, MUR 7293. The letter from the FEC and attached complaint were received at my offices at 708 Central Avenue on Friday, 17 November 2017. This response is being sent via email on 21 November 2017, well within the 15-day window that is stated in the letter from the FEC.

This letter will address the following sections of the complaint, MUR 7293, that deal with my purchase of a 2004 Kountry Star M-3706 motorhome from the Zinke for Congress campaign on 5 June 2017 for a purchase price of \$25,000.00. (See attachment A – Check 5033 from F. Edward Buttrey to Zinke for Congress).

Section 2: This section states that a motorhome was sold to a "family friend at a below market price". I dispute the fact that the motorhome was sold to me at "below market price" as the recreational vehicle was in marginal shape, with engine problems, system wide problems, and a custom wrap for the Zinke for Congress campaign that needed to be removed and replaced. Upon taking possession of the motorhome, engine problems were immediately experienced, and the motorhome was taken to a local diesel engine repair shop, Mechanix Unlimited, for repairs (see attachment B – Mechanix Unlimited Invoice). After engine repairs were completed, the motorhome was taken to Gardner's RV & Trailer for system maintenance and appraisal. See attachment C – Appraisal from Gardner's RV & Trailer for professional evaluation of the value of the motorhome, post engine repair. The appraised value as of the date of delivery to the RV dealership (26 June 2017) was seen to be \$24,000.00.

Section 19: This section states that the "NADA Guides, an online valuation services, listed the average price of the RV at the time of sale as \$49,300, with the low valuation at \$40,900". See attachment D - NADA Guides Valuation that shows the Used Wholesale Trade-In value at \$34,500 and the Used Retail value at \$48,450.

Section 43: This section states that "In June 2017, Zinke for Congress sold the RV for \$25,000 to an "old friend" of Zinke, Ed Buttrey - \$34,100 less than, or 42 percent of, what it had bought it for the previous year. At the time of the sale, valuation guides estimated the value of the RV at \$49,300". I did in fact pay the amount of \$25,000 to the Zinke for Congress campaign for the motorhome. The average "Used Retail" value of the motorhome, as seen in the NADA Guides, for a motorhome with working engine, working systems and non-custom wrap is stated as \$48,450. The motorhome upon purchase, and after engine repairs, was appraised by a professional RV dealership at a value of \$24,000.

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In addition to the engine issues that required repair, the motorhome had other serious issues such as non-functioning power awning that was damaged in some type of collision, rear broken closet doors (mechanism broken and glass broken), non-functioning power levelling system, non-working refrigerator and Icebox, broken rear window closure mechanism, window leaks, non-fully functioning slideouts (2), missing main console television, non-working bedroom television, non-working stereo system, blown speakers throughout, electrical power drain, missing TV cabinet enclosure, missing/broken marker lights, non-functioning tail light, rear roof ladder damage, power supply panel damage, missing main air conditioner cover and damage to air conditioner unit, cracked windshield, broken refrigerator grill, nonfunctioning external storage door locks, bent exhaust pipe, inoperable bathroom vent cover and motor. damaged rear brush/exhaust guard, rough running generator needing maintenance, and other issues. In addition, the cost estimated by Gardner's RV & Trailer to remove the custom wrap is \$2,380 (20 hours at \$119/hour) and by Kelly Signs to design and install a new wrap at \$8,000.00. To move the motorhome between repair shops, a charge of \$518.08 was paid to Fast Signs to temporarily cover any wrapping that stated Zinke or Congress on the RV. These issues contribute to the appraised value of \$24,000, after completion of engine maintenance, that was stated by the professional RV dealership. It is my assertion that the fair market value of the motorhome, as purchased by myself from the Zinke for Congress campaign was certainly not in excess of the \$25,000 that was paid. (See attachment B -Mechanix Unlimited Invoice, attachment C - Appraisal from Gardner's RV & Trailer, attachment D -NADA Guides Valuation, attachment E – Gardner's RV & Trailer Repair Invoice, attachment F – Reference Audio Video Repair Invoice).

Section 44: **This section states that ".... or it sold the RV to Zinke's friend Buttrey at a price below fair market value".** The marginal shape of the RV upon purchase, as further proven by the value seen in the appraisal provided by the RV dealership, proves that the price paid for the motorhome was at or more than the fair market value of the RV at the time of purchase.

Section 46: This section states "If Zinke for Congress sold the RV to Ed Buttrey at a price below fair market value, the difference between that value and the purchase price would constitute the conversion of campaign funds to the personal use of Buttrey, 11 C.F.R 113.1 (g)(3), in violation of 52 U.S.C. 30114(b)(1). As the purchase price of the motorhome paid to the Zinke for Congress campaign was at or more than the fair market value, it must follow that there was no illegal or inappropriate conversion of campaign funds for my personal use.

To summarize, I believe that the appraisal of the motorhome shows the true value of the RV when purchased from the Zinke for Congress campaign, and does not even consider the deduction of cost for the needed engine repairs. To date, I have expended \$30,450 for the motorhome in purchase price and repairs. I expect to expend an additional minimum \$17,000 to bring the motorhome up to average retail standard, which includes removal and replacement of the custom wrap (currently wrapped in campaign design), replacement of the power awning, replacing the closet doors, replacement of the rear window closure, fixing main window leaks, new windshield, new exhaust pipe, new vents/motors, new debris guard, new refrigerator grill, new compartment locks, and fixing other miscellaneous items. Once all these additional repairs are completed, I believe that the motorhome value will indeed approach the Used Retail Value as listed in the NADA Guides.

Please address any questions to the undersigned.

Sincerely,

F. Edward Buttrey

708 Central Avenue, Great Falls, MT 59401

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Attachments:

- A: Check 5033 from F. Edward Buttrey to Zinke for Congress
- B: Mechanix Unlimited Invoice
- C: Appraisal from Gardner's RV & Trailer
- D: NADA Guides Valuation
- E: Gardner's RV & Trailer Repair Invoice
- F: Reference Audio Video Repair Invoice

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F. Edward Bultrey	5033
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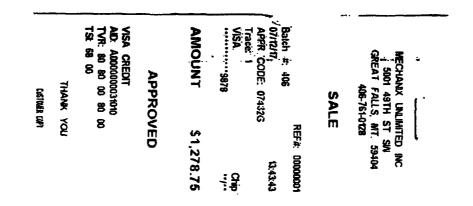
MECHANIX UNLIMITED

5001 49TH STREET SW GREAT FALLS, MT 59404 PHONE (406) 761-0128 invoice #: 40772 Service: 06-29-2017 Time: 6:56:45 AM

BUTTREY, ED

GREAT FALLS, MT

Tech	Qty.	Part Number	Description	Each Price	Total
		T-1 ENGINE O	/ERHEATS ON HILLS, WHISTLING NOISE FROM ENGINE.		
111	4.7		OKEN TUBE-TURBO TO COOLER, STEAM CLEAN TERNALLY PLUGGED FROM FUEL LEAK ON ENGINE.		413.60
		T-2 OIL ON REA	AR OF COACH-CHECK FOR LEAK		
111	4.8		INJECTOR TUBE LEAKING UNDER PRESSURE. R&R VALVE COVER TO CTOR TUBE & O RINGS, TEST DROVE.		422.40
111	t	3949910	CONNECTION GASKET	2.37	2.37
111	1	3964647	AIR TRANSFER TUBE	195.30	195.30
111	2	3957456	BAND CLAMP	39.48	78.96
111	1	5260647	CONNECTION GASKET	2.03	2.03
111	1	FR	FREIGHT	17.00	17.00
111	1	3954324	VALVE COVER GASKET	54.95	54,95
111	1	2872395	FUEL SUPPLY CONNECTOR	65.99	65.99
111	1	FR	FREIGHT	11.15	11.15
			Recommended Services	 	<u> </u>



Parts an	d Labor Warrantied for 6 r	nos/6,000 Miles Whichever Occurs First	
	PO	#:	La
Vehicle:	2004 NEWMAR CLASS A	Miles In: 137075	
License:	2-27583B	Miles Out: 0	Pa
Vin:		Fleet Unit#:	
Home:		Cell:	
Work:	• -	Pager:	

Thank you for your business. We look forward to seeing you in the future. If you should have any questions or concerns about the repairs made to your vehicle please contact us.

Department	Sale
Labor	836.00
Parts	427.75
Shop Supplies	15.00
Other	0.00
Enviromental fees	0.00
SUB TOTAL	1,278.75
Sales Tax	0.00
TOTAL	1,278.75
BALANCE	1,278.75



To whom it may concern:

Appraisal for 2004 Kountry Star M-3706, as presented to Gardner's RV Center by Ed Buttrey for repairs on June 26, 2017. Per Buttrey, the motorhome had already had engine repairs completed at the time it was brought to Gardner's RV for service.

Motorhome has a custom graphic wrap that needs to be removed and replaced or painted. Existing paint is also cracked and chipped and needs to be reconditioned.

The overall condition of the coach is seen to be marginal and needs extensive reconditioning.

My professional estimate of ACV (actual cash value) is \$24,000.00

Craig Painter

Store Manager Gardners Rvs & trailer center 406-454-0777 4035 10th Ave s Great Falls, MT. 59405

2004 Kountry Star M-3706-Freightliner 300 (*)

Vehicle Type	Motorhomes
Fuel Type	Diesel
Model	M-3706-Freightliner 300 (*)
Length	37' 6"
Coach Design	Motor Home (Class A)
FloorPlan	Queen Bed
Self-Contained	Yes
Slides	2
Self-Contained	Yes

	Suggested List	Used Wholesale Trade-In	-	Used Retail
BASE PRICE	\$181,748	\$34,50	0	\$48,450
	\$181,748	\$34,50	0	\$48,450

Vehicle Notes

Manufacturer Note:

Air conditioner, stereo, side awning, generator, hydraulic leveling jacks, rear view monitor system, microwave, color TV, tow hitch and roof rack with ladder are included in price. No longer producing.

Air conditioner, stereo, side awning, generator, hydraulic leveling jacks, rear view monitor system, microwave, color TV, tow hitch and roof rack with ladder are included in price. No longer producing.

1995-current pricing includes air conditioner, stereo, side awning, generator, hydraulic leveling jacks, rear view monitor system, microwave, color TV, tow hitch and roof rack with ladder are included in price. No longer producing.

1995-current pricing includes air conditioner, stereo, side awning, generator, hydraulic leveling jacks, rear view monitor system, microwave, color TV, tow hitch and roof rack with ladder are included in price. No longer producing.

Year Note:

In addition to what is standard and otherwise noted, 2004 prices include fluorescent lighting, 2nd air conditioner, ice maker, power leather seats, inverter, upgraded vent, washer/dryer, dual pane windows and marble floor in kitchen/bath (simulated in pusher models). Diesel pusher models also include multi CD player/amplifier/subwoofer and CB radio.

In addition to what is standard and otherwise noted, 2004 prices include fluorescent lighting, 2nd air conditioner, ice maker, power leather seats, inverter, upgraded vent, washer/dryer, dual pane windows and marble floor in kitchen/bath (simulated in pusher models). Diesel pusher models also include multi CD player/amplifier/subwoofer and CB radio.

Model Note:

(*)Price includes slide-out room(s) as standard equipment.

(*)Price includes slide-out room(s) as standard equipment.

Value Explanations

Suggested List

The value listed in this column reflects the approximate price of the unit when it is brand new. The prices listed are furnished by the manufacturer and are assumed to be correct. The list price does not include freight charges.

Used Wholesale Trade-In

(Low Book) - This column reflects the average wholesale value of a used unit "ready for resale". This may also be considered a trade-in value.

Used Retail

(High Book) - This column reflects the retail value of a used unit 'ready for resale'.

"BRAND NEW", Non Current:

The Used Retail Value does not represent "brand new" non-current year vehicles. Recent market research shows that "brand new" non-current models can increase the used value of an identical model by 6%-12%.

Self-Contained

This column will inform you as to whether the individual unit is self-contained or not.

https://extapps.nada.com/NADAOnline/RV/PricingPrint

GARDNER'S RV & TRAILER 4035 10TH AVE S. GREAT FALLS MT USA 59405 Phone #:(406) 454-0777 Fax #: (406) 454-2516

Invoice Number: 2005952 Tag Number: Date and Time In: 7/13/2017 - 7:53 AM Date and Time Out: 8/31/2017 - 8:23 AM Promised Date - Time: 6/26/2017 - 8:21 AM Cashed Out Date: 8/15/2017 - 11:05 AM



Date Appointment Initiated: 6/26/2017

Service Advisor: (519) Kaity Lippel

Edward Buttrey

1424R

Bigfork MT 59911

Home: (

Repair	Hrs	VIN	Requested Repair	Description	Mech #	Туре	Labor	Discount	Total
l	1.00		C/S POWER AWNING CASE IS D CORRECTION: TECH REMOVEL CASE. AWNING FUNCTIONS BU WEATHER SENSORS ON OCCAS	POWER AWNING TT HAS ISSUES IN THE	522	Retail	\$119.00	\$0.00	\$119.00
2	0.30		C/S CLOSET DOOR IN REAR OF CORRECTION: TECH FOUND TH LOOSE. TECH RE INSTALLED. I WILL NEED TO GO THROUGH A REPLACEMENT	UNIT IS BROKEN NM AND FRAME BROKEN GLASS DOOR	522	Rctail	\$35.70	\$0 :00	\$35.70
3	2.()()		C/S LEVELING HAS ISSUES CAUSE: WAITING FOR CALL B/ AND PRICING!!!!!!! CORRECTION: TECH FOUND DI LEG NOT RETRACTING. TECH SYSTEM AND FOUND THAT LE HELPER SPRINGS AND BAD CY TECH REMOVED OLD LEG ANI TESTED, OPS GOOD	RIVERS SIDE FRONT FROUBLE SHOT G TO HAVE BAD 'LINDER FOR LEG.	522	Retail	\$238.00	\$0.00	\$238.00
4	1.00		C/S REFER WONT FIRE CORRECTION: TECH TESTED R POWER TO UNIT. TECH CHECK BOARD NONE FOUND. TECH RI AND REFER WOULD FIRE. CON MANUFACTURE AND FOUND R INSTRUCTIONS. RESET FUSE B REFER OPS GOOD	ED FOR POWER AT EMOVED RECALL KIT ITACTED REFER RECALL RESET	522	Retail	\$119.00	\$0.00	\$119.00
5	0.20		C/S WINDOW IN BACK BEDROC CORRECTION: TECH FOUND W TO BE STRIPPED OUT. COULD PARTS TO REPAIR.	INDOW MECHANISM	522	Retail	\$23.80	\$0.00	\$23.80
Pay Ty	ype	<u>CC #</u>	Amount	Parts Total:	\$593.	30	Ext Price:	\$1,4	00.89
OA			\$1,315,89	Core Total: Freigh Total: Sublet Total:	\$0.0 \$18.0 \$0.0	00	Sales Tax: Total: - Deductible: - Deposits:	\$1,4	\$0.00 00.89 \$0.00
Signat				Labor Total:	<u>\$749.</u> \$0.0		Amount Due:		SO .001 00.89
		Y THE ABOVE /: (519) Kaity	TOTAL AMOUNT	Other Charges:	\$0.	00			/
Cash C	-	8/15/2017 004	ырры	Shop Supplies: Sub Total: - Parts Discount:	\$39.5 	391			

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Repair added after the customer cupy printed.Oil & Grease included in Other Charges. Page 1 of 3

GARDNER'S RV & TRAILER 4035 10TH AVE S. GREAT FALLS MT USA 59405 Phone #:(406) 454-0777 Fax #: (406) 454-2516

Invoice Number: 2005952 Tag Number: Date and Time In: 7/13/2017 - 7:53 AM

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Date Appointment Initiated: 6/26/2017 Service Advisor: (519) Kaity Lippel

Edward Buttrey	1424R
Bigfork MT 59911	

SHIPPING CHARGES

Home: 7

3	RAP9517	HYDRAULIC CYLINDER		1.00	\$508.30	\$0.	.00	\$508.30
Repair	Part #	Description		Qty	Selling Price	Extend Discou		xtended Price
9	0.00	storage fee	519	Retail		60.00	\$0.00	\$0.00
-		LUBE CORRECTION: TECH LUBRICATED SLIDE OUT ASSEMBLY'S. ALL OP GOOD.						
8	0.30	CORRECTION: TECH ADJUSTED SLIDE OUT IN ON LEFT HAND CORNER, OPS GOOD C/S BOTH SLIDES ARE HARD TO GET IN MAY NEED	522	Retail	.2	35.70	\$0.00	\$35.70
7	1,00	CORRECTION: TECH CHECKED FOR WATER LEAK. FOUND LEAK PRESENT. WINDOW SEAL IS CRACKED AND DRY. NEEDS NEW SEAL OR WINDOW. WEEP HOLES WERE COVERED IN VINYL WRAP. CUT DRAINS OUT FOR WEEP HOLES AND LEAK IS MUCH SMALLER BUT STILL PRESENT. C/S MAIN SLIDE OUT DOES NOT CLOSE ALL THE WAY	522	Retail	SI	19,00	\$0.00	\$119.00
6	0.50	C/S FRONT SIDE WINDOWN ON FRONT OF DRIVERS SIDE LEAKS	522	Retail	S:	59. 5 0	\$0.0 0	\$59.50

PM storage fee ANY UNIT LEFT HERE MORE THAN TEN (10) DAYS AFTER YOU HAVE BEEN NOTIFIED THAT THE WORK IS COMPLETED WILL BE CHARGED \$10.00 PER DAY, UNLESS PRIOR ARRANGMENTS HAVE BEEN MADE.

Pay Type CC # Amount OA \$1.315,89 Signature:	Parts Total: \$593.30' Ext Price: \$1,400. Core Total: \$0.00' Sales Tax: \$0. Freight Total: \$18,00 Total: \$1,400. Sublet Total: \$18,00 Total: \$1,400. Sublet Total: \$18,00 Deductible: \$0. Labor Total: \$0.00 Deductible: \$0. Labor Discount: \$0.00 Amount Due: \$1,400. Other Charges: \$0.00 Amount Due: \$1,400. Sub Total: \$1,400.89 \$1,400.89 \$1,400. Parts Discount: \$0.00 \$0.00 \$1,400.89
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GARDNER'S RV & TRAILER 4035 10TH AVE S.	Invoice Number: 2005952 Tag Number:			
GREAT FALLS MT USA 59405	Date and Time In: 7/13/2017	- 7:53 AM		
Phone #:(406) 454-0777	Date and Time Out: 8/31/2017	- 8:23 ÅM	-1 t	
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	Promised Date - Time: 6/26/2017. Cashed Out Date: 8/15/2017	- 11:05 AM	表有 62 日	
Date	Appointment Initiated: 6/26/2017			
	Service Advisor: (519) Kaily	r Lippel		
14248				

Edward Buttrey SI Bigfork MT 59911

Home:

DISCLAIMER OF WARRANTIES - Any warranties on the products sold under this repair order are those made by the manufacturer. The seller hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability or fitness for a particular purpose, and seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of said products. This disclaimer by the Seller, in no way affects the terms of the manufacturer's warranty. I hereby authorize the repair work to be done along with necessary materials. You and your employees may operate above vehicle for purposes of looking, inspection or delivery at my risk. An express mechanic's lien is acknowledged on above vehicle to secure the amount of repairs hereto. You will not be held responsible for loss or damage to vehicle or articles left in vehicle in case of fire, theft, accident or any other cause beyond your control.

Signed:X

DATE_

Pay Type CC # Amount OA \$1,315.89 Signature:	Parts Total: \$593.30 Ext Price: \$1,400.8 Core Total: \$0.00 Sales Tax: \$0.0 Freight Total: \$18.00 Total: \$1,400.8 Sublet Total: \$18.00 Total: \$1,400.8 Sublet Total: \$18.00 Total: \$1,400.8 Sublet Total: \$18.00 Total: \$1,400.8 Labor Total: \$1,400.8 Deductible: \$0.00 Labor Discount: \$1,400.8 \$0.00 \$0.00 Other Charges: \$0.00 \$0.00 \$1,400.8 Shop Supplies: \$39.89 \$1,400.89 \$1,400.89 Parts Discount: \$1,400.89 \$0.00 \$1,400.89	00000
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Puge 3 of 3

GARDNER'S RV & TRAILER CENTER, INC. 4035 10TH AVE S. GREAT FALLS MT USA 59405 Phone #:(406) 454-0777 Fax #: (406) 454-2516

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Employee : (517) Leigh Baroch

Transaction Number: 117384 - POA

Tax ID:

Edward Buttrey

Customer Number: 1424R

Transaction Date: 8/31/2017 - 8:25 AM Entity Reference Number: 2005952

· · · · Bigfork MT 59911

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Home:

Pay Type CHECK	<u>CC #</u> 2571	<u>Amount</u> \$1,400,89	Payment Amount: Amt Tendered: Chg Returned:	\$1,400.89 \$1,400.89 \$0.00	
Signature:	<u></u>	·	* .	s	
AGREE TO PAY THE ABOVE TOTAL AMOUNT				e de la	

Printed on : 8/31/2017 8:25 AM

Page 1 of 1

Printed: 11/17/2017 10:49:58 AM Store: 1 Workstation: 1

Sales Receipt #24706

11/17/2017 Cashier: Page 1



Reference Audio/Video 3218 10Th Avenue South Great Falls, MT 59405 www.refav.com (406) 452-0090 Your Total Entertainment Solution!

19044472602

Bill To: Ed Buttrey

Description 1	Description 2	Attribute	Size	Orig Price	Disc % Type	Qty	Price	Ext Price	Tax
Kenwood KDC-X502	CD Receiver w/USB			\$179.99		1	\$179.99	\$179.99	Т
Sirius SXV300V1	Connect Vehicle Tuner			\$69.99		1	\$69.99	\$69,99	Т
Serial # VLPL0D8P									
AAMP USBCBL	Dash Mount USB Input			\$24.99		2	\$24,99	\$49.98	
Kicker 11KB6000B	6.5" 2-Way Outdoor Speakers			\$199.95		1	\$199.95	\$199.95	T
Best Kits BKTVC104	Universal Full Underdash			\$19.99		1	\$19.99	\$19.99	Т
Best Kits BACR12	12" Antenna Extension			\$9.99		1	\$9.99	\$9.99	Т
16/2 Speaker Wire	Home/Commercial Use			\$0,43	70.88%	50	\$0.13	\$6.26	T
16/4 Speaker Wire	Home/Commercial Use			. \$0.84		50	\$0.84	\$42.00	Т
JVC KD-R97MBS Serial # KD-R97MB	CD Reciever w/Bluetooth S112X0831	Sat Ready		\$179.95		1	\$179.95	\$179.95	Т
Stinger SI4220	RCA Interconnect		20 foot	\$24.99		1	\$24.99	\$24.99	
3.5mm (1/8") male to RCA				\$6.99		1	\$6.99	\$6.99	
Samsung 32" TV				\$299.99		1	\$299.99	\$299.99	
Sceptre 19" TV				\$99.99		1	\$99.99	\$99.99	
32" Flat TV Mount				\$49,99		1	\$49.99	\$49.99	
Audio Converter				\$49.99		1	\$49.99	\$49.99	
Samsung Blu-Ray Player				\$69.99		1	\$69.99	\$69.99	
General Shop Service		Labor		\$65.00		8	\$65.00	\$520.00	
1m HDMI Cable			3.3ft	\$24,99		2	\$24.99	\$49.98	Т
Sanus VSF415B1	15-39" Articulating Wall Mount			\$119.99		1	\$119.99	\$119.99	Т
Custom TV Frame				\$385.00		1	\$400.00	\$400.00	T
					_	Subtotal:	\$2,450.00		
				Local Sale		0 % Tax	+ \$0.00		
					RECEIF	PT TOTAL:	\$2,450.00		

Cash: \$2,450.00

Expiry Date: XX/XX

Total Sales Discounts:

\$0.24

Store Credit Only On Returns Within 30 Days 10% Restock Fee On Returns 15% Charge On All Layway Refunds After 30 Days 1.5% Monthly Interest Charge On All Past Due Accounts (18% Annual) Minimum \$15.00 Thank you for choosing Reference Audio/Video! Like Us On Facebook!

11/28/17

To whom it may concern,

I have been employed at Gardner's RV for 19 years, with the last 5 years as Store and Sales Manager. I am in charge of purchasing new and used inventory and oversee reconditioning of used inventory as well.

I have reviewed the NADA book value provided by Trevor Rebish for the 2004 Newmar Kountry Star RV in or around April 2016. Trevor was a Salesman at Gardner's at that time. In 2016 Trevor provided the NADA book value of \$59,100. Book Values are produced when we get requests from banks and insurance companies to establish retail value of a specific year and model of an RV.

In the spring of 2017 I evaluated this unit for Ryan Zinke and looked it up in the NADA book, took in consideration reconditioning and repairs and quoted a value of \$25,000 to \$30,000.

The obvious repairs the motorhome needs are as follows;

Remove vinyl wrap, which would certainly peel paint underneath given the number of years it has been on there. The estimate to remove wrap and address body work and paint was valued at \$15,000 to \$20,000.

The motorhome had mechanical issues that would take over \$1,000 to fix. Interior would have needed carpet and some upholstery replaced and cosmetic attention costing \$3,000 to \$4,000.

I have also reviewed Craig Painter's evaluation of the RV from around June 2017 and I feel that it was accurate and reasonable.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 28, 2017.

Thank you,

than Bugeson

Shawn Bergeson, Sales Manager