

STATE OF VERMONT
SUPERIOR COURT
WASHINGTON UNIT

VT SUPERIOR COURT
WASHINGTON UNIT
CIVIL DIVISION

2015 DEC -8 P 3:30

Aspen Marketing Services, LLC)
)
)

CIVIL DIVISION

Docket No.

FILED
774-12-15 Wncv

ASSURANCE OF DISCONTINUANCE

Vermont Attorney General William H. Sorrell (“the Attorney General”) and Aspen Marketing Services, LLC hereby agree to this Assurance of Discontinuance (“AOD”) pursuant to 9 V.S.A. § 2459.

REGULATORY FRAMEWORK

1. Vermont’s Consumer Protection Act prohibits “[u]nfair or deceptive acts or practices in commerce.” 9 V.S.A. § 2459.

BACKGROUND AND ALLEGATIONS

2. Aspen Marketing Services, LLC (“Aspen”), is a Delaware limited liability corporation, with principal executive offices located at 6021 Connection Drive, Irving, Texas 75039.

3. Aspen has contracts with motor vehicle manufacturers pursuant to which it provides marketing and advertising assistance to their individual motor vehicle dealers.

4. Aspen works with such motor vehicle dealers to create mailing lists for direct mail recipients. Those recipients include persons who have purchased motor vehicles from the motor vehicle dealers, as well as persons who have not made previous purchases. The direct mail pieces are designed to attract customers to the motor vehicle dealerships so that they will purchase motor vehicles.

5. During the period from October 24, 2013 through January 18, 2014, Aspen prepared and mailed, to a total of 81,300 Vermont consumers, nine substantially identical direct mail pieces on behalf of five Vermont motor vehicle dealers. The direct mail pieces, which were prepared in the form of letters addressed to individual Vermont consumers, reflected the GM logo at the top and a specific GM motor vehicle dealer's name and address at the bottom ("Letter"). Each Letter (a copy of which is annexed hereto as Exhibit A) said that:

- a. It served as an "Official Buyback Notice" to the consumer;
 - b. The motor vehicle dealer was going to host an "exclusive buyback program" during the time specified in the Letter;
 - c. The motor vehicle dealer had been "selected" as the "host location" for a "unique Buyback Event";
 - d. The consumer had been "selected to be included" in the event as the "current owner of a highly sought after vehicle";
 - e. The motor vehicle dealer was in "desperate need" to acquire the consumer's vehicle by the date reflected in the Letter, in order to "fulfill special used vehicle requests";
 - f. The motor vehicle dealer's sales managers were "authorized to buy back your vehicle";
- and
- g. The consumer had to bring the Letter to the motor vehicle dealer to be admitted to the Buyback Event because, "due to the nature of the event", it would "not be advertised to the general public."

6. Based on information obtained by the Attorney General, it appears that none of the five Vermont motor vehicle dealers were selected by the manufacturer to host an "exclusive buyback program" or "Buyback Event" referred to in the Letter.

7. Entry to a Buyback Event was not limited to consumers who received a Letter, nor were consumers required to present a Letters in order to attend.

~~8. Aspen compiled a list of Vermont consumers to whom each motor vehicle dealer's~~
Letter would be sent. The list Aspen compiled for each motor vehicle dealer was based on the same two sources: a) mailing lists purchased by Aspen, on behalf of the motor vehicle dealers, which reflected the names and addresses of Vermont motor vehicle owners who lived within a certain proximity to the motor vehicle dealer; and b) names and addresses of actual or prospective customers that the motor vehicle dealer provided to Aspen.

9. The Attorney General alleges that the above conduct constitutes unfair and deceptive acts and practices under 9 V.S.A. §2453 and Consumer Protection Rule 118.02(b) (1), (2) and (6).

10. Aspen does not admit to any violation of Vermont law. Nothing herein shall be construed to limit Aspen's right or ability to assert any legal, factual or equitable defenses in any pending or future proceeding, except with respect to enforcement of this Assurance of Discontinuance by the Attorney General.

INJUNCTIVE RELIEF

11. Aspen shall comply with the Vermont Consumer Protection Act, 9 V.S.A. §§ 2451 *et seq.* and Consumer Protection Rule 118.02(b) (1), (2) and (6) in connection with its motor vehicle marketing efforts.

12. Aspen shall permanently cease preparing, assisting in the preparation of, or sending any advertisement or marketing piece substantially in the form of Exhibit A hereto, to Vermont consumers.

13. Aspen shall not prepare, assist in the preparation of, or send any advertisement or marketing piece, in the form of a letter or otherwise, that states or uses language which implies that:

a. Consumers have been specially selected to attend a particular event or receive any special treatment or benefit when that is untrue;

b. A motor vehicle dealer has been specially selected by a motor vehicle manufacturer to host a buyback program or event, exclusive event or other sales event, when that is untrue;

c. The buyback or sales event is an event that is sponsored or approved by a motor vehicle manufacturer, when that is untrue; or that

d. A sales event is "exclusive", not open to the public, or requires an invitation or other evidence of selection for admission, when that is untrue.

PAYMENT

14. Within 10 days of the date Aspen signs this AOD, Aspen shall pay the State of Vermont the sum of \$109,000, and send its payment to the attention of: Jill S. Abrams, Assistant Attorney General, Office of the Attorney General, 109 State Street, Montpelier, VT 05609.

REPORTING

15. To determine or secure compliance with this Assurance of Discontinuance ("AOD"), on reasonable notice given to Aspen, subject to any lawful privilege, Aspen shall make available to the Attorney General for inspection and copying, a print or electronic copy capable of being printed, of all advertising and marketing, including direct mail pieces, that it prepared or worked on and that were directed to Vermont consumers on behalf of Vermont motor vehicle dealers,

and such other documents that demonstrate that the representations and offers made therein are true.

16. For one year from the date both parties sign this AOD, Aspen shall provide, at the request of the Attorney General of the State of Vermont, all such marketing and advertising materials, including direct mail pieces, that it publishes and directs to Vermont consumers on behalf of Vermont motor vehicle dealers.

17. Aspen shall respond diligently and promptly to a request for information and documents related to such Vermont advertising and marketing which the Attorney General determines would be of assistance to the State in enforcing compliance with this AOD.

OTHER TERMS

18. Aspen agrees that this AOD shall be binding on Aspen and its successors, assigns, affiliates, licensees, representatives, administrators, employees, shareholders, managers, officers, directors, board of directors, attorneys, agents, servants and assignees.

19. The Attorney General hereby releases and discharges any and all claims under the Consumer Protection Act, 9 V.S.A. §§ 2451-2480, and CP 118.02 (b) (1), (2) and (6) it has against Aspen for Aspen's conduct between the dates of October 24, 2013 and January 18, 2014, as described in the Background and Allegations section of this AOD. The Attorney General similarly releases Aspen's subsidiaries, affiliates and licensees, past and present, and their past and present representatives, successors, administrators, employees, shareholders, managers, officers, directors, board of directors, attorneys, agents, servants and assignees.

20. The Superior Court of the State of Vermont, Washington Unit, shall retain jurisdiction over this AOD and the parties for the purpose of enabling the Attorney General to

apply to this Court at any time for orders and directions as may be necessary or appropriate to enforce compliance with or punish violations of this AOD.

21. Acceptance of this AOD by the Vermont Attorney General's Office shall not be deemed approval by the Attorney General of any practices or procedures of Aspen not required by this AOD, and Aspen shall not make any representation to the contrary.

22. This AOD is a voluntary settlement agreement and a compromise of disputed allegations of fact and does not constitute an admission by Aspen of the violation of any law, rule, or regulation. Nothing in this Assurance of Discontinuance shall be construed to limit Aspen's ability or right to assert any legal or equitable defense in any pending or future proceeding of any kind, except with respect to enforcement of this AOD by the Vermont Attorney General. Entry of this AOD by Aspen does not constitute a waiver of any claims or defenses Aspen may have in any proceeding that has been or may have been brought against it by any third party arising from or related to matters which are or may have been the subject of this AOD.

NOTICE

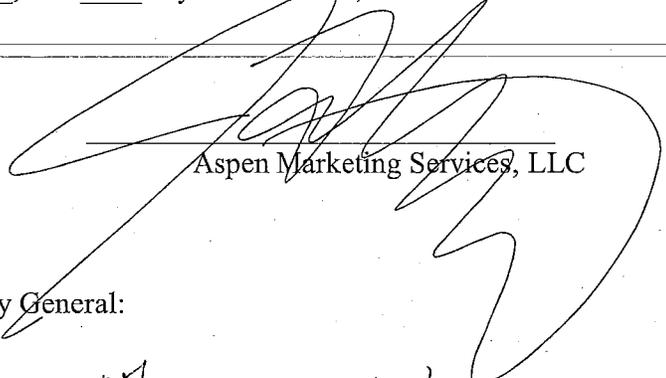
23. Aspen is located at 6021 Connection Drive, Irving, Texas 75039.

24. Aspen shall notify the Attorney General within 20 days of any change of address, and shall make a good faith effort to notify the Attorney General within 20 days of a change in its business name.

SIGNATURE

25. In lieu of instituting an action or proceeding against Aspen, the Office of the Attorney General, pursuant to 9 V.S.A. § 2459, accepts this AOD. By signing below, Aspen voluntarily agrees with, and submits to, the terms of this AOD.

DATED at _____, this 3 day of December, 2015.


Aspen Marketing Services, LLC

ACCEPTED on behalf of the Attorney General:

DATED at Montpelier, Vermont this 3rd day of December, 2015.

STATE OF VERMONT

WILLIAM H. SORRELL
ATTORNEY GENERAL

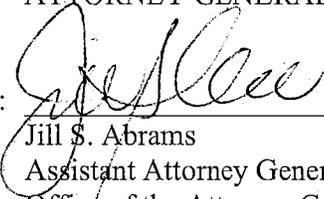
By: 
Jill S. Abrams
Assistant Attorney General
Office of the Attorney General
109 State Street
Montpelier, VT 05609
Jill.Abrams@vermont.gov
(802) 828-1106

EXHIBIT A



OFFICIAL BUYBACK NOTICE!

0% APR *up to* **60 mos.**
or over
\$11,000* in savings

<<First Name>> <<Last Name>>
 <<Address>>
 <<City>>, <<State>> <<Zip>>

INFORMATION ON THIS EXCLUSIVE BUYBACK PROGRAM:

Dear <<First Name>><<Last Name>>,

Auto Mall in Brattleboro, Vermont, has been selected to be the host location for a unique Buyback Event. We have successfully traded 100s of customers out of their older vehicles and into new Chevrolets, Buicks, and GMCs using this experimental program. As a current owner of a highly sought after vehicle, you have been selected to be included in this event!

We are in desperate need to acquire your pre-owned vehicle by **December 5** in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any **NEW 2014 or 2013** vehicle or any late-model Certified Pre-Owned vehicle. With factory incentives like **0% financing up to 60 months, or over \$11,000* in savings, and more for your trade than you ever thought possible**, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

<<First Name>><<Last Name>>, bring this letter for admittance to this event and present it to an authorized sales representative at Auto Mall. Please stop by or call us at (888) 323-4834 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. **This will be your only notification!**

Monday, November 25, 2013	8:00 a.m. – 8:00 p.m.	Sunday, December 1, 2013	10:00 a.m. – 3:00 p.m.
Tuesday, November 26, 2013	8:00 a.m. – 8:00 p.m.	Monday, December 2, 2013	8:00 a.m. – 8:00 p.m.
Wednesday, November 27, 2013	8:00 a.m. – 8:00 p.m.	Tuesday, December 3, 2013	8:00 a.m. – 8:00 p.m.
Thursday, November 28, 2013	Happy Thanksgiving (Closed)	Wednesday, December 4, 2013	8:00 a.m. – 8:00 p.m.
Friday, November 29, 2013	8:00 a.m. – 7:00 p.m.	Thursday, December 5, 2013	8:00 a.m. – 8:00 p.m.
Saturday, November 30, 2013	8:00 a.m. – 5:00 p.m.		

Final Day of Event – December 5, from 8:00 a.m. – 8:00 p.m.

*On select vehicles. See dealer for complete details. Must qualify for factory incentives.

Special Test Market Site

WE WANT YOUR TRADE!

Please present this notification and one piece of identification to gain entrance to this private sales event.



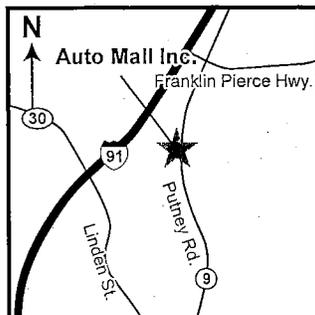
800 Puney Road • Brattleboro, VT 05301

Service Hours:
 Mon. – Thurs. 8:00 a.m. – 8:00 p.m.
 Fri. 8:00 a.m. – 7:00 p.m.
 Sat. 8:00 a.m. – 5:00 p.m.
 Sun. 10:00 a.m. – 3:00 p.m.
 Mon. – Fri. 8:00 a.m. – 5:30 p.m.
 Sat. 8:00 a.m. – Noon
 Sun. Closed

For More Details, Call: **(888) 323-4834**

Schedule your appointment online:

www.brattautomall.com



Monday, November 25, 2013	8:00 a.m. – 8:00 p.m.
Tuesday, November 26, 2013	8:00 a.m. – 8:00 p.m.
Wednesday, November 27, 2013	8:00 a.m. – 8:00 p.m.
Thursday, November 28, 2013	Happy Thanksgiving (Closed)
Friday, November 29, 2013	8:00 a.m. – 7:00 p.m.
Saturday, November 30, 2013	8:00 a.m. – 5:00 p.m.
Sunday, December 1, 2013	10:00 a.m. – 3:00 p.m.
Monday, December 2, 2013	8:00 a.m. – 8:00 p.m.
Tuesday, December 3, 2013	8:00 a.m. – 8:00 p.m.
Wednesday, December 4, 2013	8:00 a.m. – 8:00 p.m.
Thursday, December 5, 2013	8:00 a.m. – 8:00 p.m.



Last Chance Holiday Buyback Event for 2013



0% APR up to **60 mos.**
or over
\$11,000* in savings

<<First Name>> <<Last Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

INFORMATION ON THIS EXCLUSIVE BUYBACK PROGRAM:

Dear <<First Name>><<Last Name>>,

Auto Mall in Brattleboro, Vermont, has been selected to be the host location for a unique Buyback Event. We have successfully traded 100s of customers out of their older vehicles and into new Chevrolets, Buicks, and GMCs using this experimental program. As a current owner of a highly sought after vehicle, you have been selected to be included in this event!

We are in desperate need to acquire your pre-owned vehicle by **December 31** in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any **NEW 2014 or 2013** vehicle or any late-model Certified Pre-Owned vehicle. With factory incentives like **0% financing up to 60 months, or over \$11,000*** in savings, and more for your trade than you ever thought possible, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

<<First Name>><<Last Name>>, bring this letter for admittance to this event and present it to an authorized sales representative at Auto Mall. Please stop by or call us at (877) 516-1437 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. **This will be your only notification!**

Saturday, December 21, 2013 8:00 a.m. – 5:00 p.m.
Sunday, December 22, 2013 10:00 a.m. – 3:00 p.m.
Monday, December 23, 2013 8:00 a.m. – 7:00 p.m.
Tuesday, December 24, 2013 8:00 a.m. – 2:00 p.m.
Wednesday, December 25, 2013 Merry Christmas (Closed)
Thursday, December 26, 2013 8:00 a.m. – 7:00 p.m.

Friday, December 27, 2013 8:00 a.m. – 7:00 p.m.
Saturday, December 28, 2013 8:00 a.m. – 5:00 p.m.
Sunday, December 29, 2013 10:00 a.m. – 3:00 p.m.
Monday, December 30, 2013 8:00 a.m. – 7:00 p.m.
Tuesday, December 31, 2013 8:00 a.m. – 7:00 p.m.

Final Day of Event – December 31, from 8:00 a.m. – 7:00 p.m.

*On select vehicles. See dealer for complete details. Must qualify for factory incentives.



Special Test Market Site

WE WANT YOUR TRADE!

800 Putney Road • Brattleboro, VT 05301

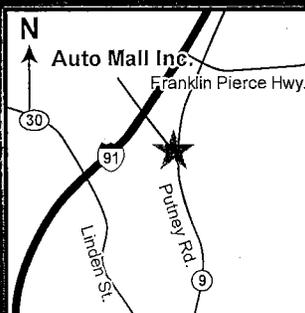
Sales Hours:

Mon. – Fri. 8:00 a.m. – 7:00 p.m.
Sat. 8:00 a.m. – 5:00 p.m.
Sun. 10:00 a.m. – 3:00 p.m.

Service Hours:

Mon. – Fri. 8:00 a.m. – 5:30 p.m.
Sat. 8:00 a.m. – Noon
Sun. Closed

Please present this notification and one piece of identification to gain entrance to this private sales event.



For More Details, Call: **(877) 516-1437**

Schedule your appointment online:

www.brattautomall.com



Saturday, December 21, 2013 8:00 a.m. – 5:00 p.m.
Sunday, December 22, 2013 10:00 a.m. – 3:00 p.m.
Monday, December 23, 2013 8:00 a.m. – 7:00 p.m.
Tuesday, December 24, 2013 8:00 a.m. – 2:00 p.m.
Wednesday, December 25, 2013 Merry Christmas (Closed)
Thursday, December 26, 2013 8:00 a.m. – 7:00 p.m.
Friday, December 27, 2013 8:00 a.m. – 7:00 p.m.
Saturday, December 28, 2013 8:00 a.m. – 5:00 p.m.
Sunday, December 29, 2013 10:00 a.m. – 3:00 p.m.
Monday, December 30, 2013 8:00 a.m. – 7:00 p.m.
Tuesday, December 31, 2013 8:00 a.m. – 7:00 p.m.



GMC

OFFICIAL BUYBACK NOTICE!

<<First Name>> <<Last Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

INFORMATION ON THIS EXCLUSIVE BUYBACK PROGRAM:

Dear <<First Name>>,

Capitol City Buick GMC in Berlin, Vermont, has been selected to be the host location for a unique Buyback Event. As a current owner of a highly sought after vehicle, you have been selected to be included in this event!

We are in desperate need to acquire your pre-owned vehicle by **January 18** in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any **NEW 2014 or 2013**, or any late-model Certified Pre-Owned vehicle. With factory incentives like **0% financing up to 60 months**, or **up to \$12,000* in rebates**, and more for your trade than you ever thought possible, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

<<First Name>>, bring this letter for admittance to this event and present it to an authorized sales representative at Capitol City Buick GMC. Please stop by or call us at (888) 567-1410 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. **This will be your only notification!**

Monday, January 6, 2014	8:00 a.m. – 6:00 p.m.
Tuesday, January 7, 2014	8:00 a.m. – 6:00 p.m.
Wednesday, January 8, 2014	8:00 a.m. – 6:00 p.m.
Thursday, January 9, 2014	8:00 a.m. – 6:00 p.m.
Friday, January 10, 2014	8:00 a.m. – 6:00 p.m.
Saturday, January 11, 2014	8:00 a.m. – 5:00 p.m.

Monday, January 13, 2014	8:00 a.m. – 6:00 p.m.
Tuesday, January 14, 2014	8:00 a.m. – 6:00 p.m.
Wednesday, January 15, 2014	8:00 a.m. – 6:00 p.m.
Thursday, January 16, 2014	8:00 a.m. – 6:00 p.m.
Friday, January 17, 2014	8:00 a.m. – 6:00 p.m.
Saturday, January 18, 2014	8:00 a.m. – 5:00 p.m.

*On select vehicles.



CAPITOL CITY BUICK GMC

We Service All Makes and Models!
1162 U.S. Rt. 2 • Berlin, VT 05602

Sales Hours:

Mon.-Fri., 8:00 a.m.–6:00 p.m.
Sat., 8:00 a.m.–5:00 p.m.
Sun., Closed

For More Details, Call: **(888) 567-1410**
Visit Us Online at: www.capitolcityautos.com

WE WANT YOUR TRADE!

Please present this notification and one piece of identification to gain entrance to this private sales event.

Monday, January 6, 2014	8:00 a.m. – 6:00 p.m.
Tuesday, January 7, 2014	8:00 a.m. – 6:00 p.m.
Wednesday, January 8, 2014	8:00 a.m. – 6:00 p.m.
Thursday, January 9, 2014	8:00 a.m. – 6:00 p.m.
Friday, January 10, 2014	8:00 a.m. – 6:00 p.m.
Saturday, January 11, 2014	8:00 a.m. – 5:00 p.m.
Monday, January 13, 2014	8:00 a.m. – 6:00 p.m.
Tuesday, January 14, 2014	8:00 a.m. – 6:00 p.m.
Wednesday, January 15, 2014	8:00 a.m. – 6:00 p.m.
Thursday, January 16, 2014	8:00 a.m. – 6:00 p.m.
Friday, January 17, 2014	8:00 a.m. – 6:00 p.m.
Saturday, January 18, 2014	8:00 a.m. – 5:00 p.m.

0% up to **60** mos.
APR

\$12,000* in rebates
or payments as low as

\$99 down & **\$99** per month



OFFICIAL BUYBACK NOTICE!

0% *for* **60** mos.
APR
or up to

\$8,000* in rebates
or

\$99 **\$99**
DOWN per mo.

<<First Name>> <<Last Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

INFORMATION ON THIS EXCLUSIVE BUYBACK PROGRAM:

Dear <<First Name>>,

Saint Johnsbury Buick GMC in Saint Johnsbury, VT, has been selected to be the host location for a unique Buyback Event. As a current owner of a highly sought after vehicle, you have been selected to be included in this event!

We are in desperate need to acquire your pre-owned vehicle by **December 14** in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any **NEW 2014 or 2013**, or any Pre-Owned vehicle. With factory incentives like **0% financing for 60 months or up to \$8,000* in rebates, or \$99 Down and \$99 month**, and more for **your trade than you ever thought possible**, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

<<First Name>>, **bring this letter for admittance** to this event and present it to an authorized sales representative at Saint Johnsbury Buick GMC. Please stop by or call us at (866) 201-9870 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. **This will be your only notification!**

Monday, December 2, 20138:00 a.m. – 6:00 p.m.
 Tuesday, December 3, 20138:00 a.m. – 6:00 p.m.
 Wednesday, December 4, 2013.....8:00 a.m. – 6:00 p.m.
 Thursday, December 5, 20138:00 a.m. – 6:00 p.m.
 Friday, December 6, 20138:00 a.m. – 6:00 p.m.
 Saturday, December 7, 2013.....8:00 a.m. – 4:00 p.m.

Monday, December 9, 20138:00 a.m. – 6:00 p.m.
 Tuesday, December 10, 2013.....8:00 a.m. – 6:00 p.m.
 Wednesday, December 11, 20138:00 a.m. – 6:00 p.m.
 Thursday, December 12, 20138:00 a.m. – 6:00 p.m.
 Friday, December 13, 20138:00 a.m. – 6:00 p.m.
 Saturday, December 14, 20138:00 a.m. – 4:00 p.m.

Final Day of Event—December 14, from 8:00 a.m. – 4:00 p.m.

**On select vehicles.*



WE WANT YOUR TRADE!

Saint Johnsbury Buick GMC

We Service All Makes and Models!
500 Memorial Drive • Saint Johnsbury, VT 05819

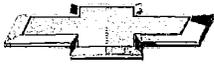
Sales Hours:

Mon.–Fri., 8:00 a.m.–6:00 p.m.
Sat., 8:00 a.m.–4:00 p.m.
Sun., Closed

For More Details, Call: **(866) 201-9870**
Visit Us Online at: **www.stjauto.com**

Please present this notification and one piece of identification to gain entrance to this private sales event:

Monday, December 2, 2013 8:00 a.m. – 6:00 p.m.
 Tuesday, December 3, 2013 8:00 a.m. – 6:00 p.m.
 Wednesday, December 4, 2013 8:00 a.m. – 6:00 p.m.
 Thursday, December 5, 2013 8:00 a.m. – 6:00 p.m.
 Friday, December 6, 2013 8:00 a.m. – 6:00 p.m.
 Saturday, December 7, 2013 8:00 a.m. – 4:00 p.m.
 Monday, December 9, 2013 8:00 a.m. – 6:00 p.m.
 Tuesday, December 10, 2013 8:00 a.m. – 6:00 p.m.
 Wednesday, December 11, 2013 8:00 a.m. – 6:00 p.m.
 Thursday, December 12, 2013 8:00 a.m. – 6:00 p.m.
 Friday, December 13, 2013 8:00 a.m. – 6:00 p.m.
 Saturday, December 14, 2013 8:00 a.m. – 4:00 p.m.



OFFICIAL BUYBACK NOTICE!

0% APR
up to
72 mos.
or up to
\$10,500*
in rebates

<<First Name>> <<Last Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

INFORMATION ON THIS EXCLUSIVE BUYBACK PROGRAM:

Dear <<Name>>,

Shea Motor Company in Middlebury, Vermont, has been selected to be the host location for a unique Buyback Event. We have successfully traded 100s of customers out of their older vehicles and into new Chevrolets using this experimental program. As a current owner of a highly sought after vehicle, you have been selected to be included in this event!

We are in desperate need to acquire several GM pre-owned vehicles by November 14th in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any NEW 2014 or 2013 vehicle or late-model Certified Pre-Owned vehicle. With factory incentives like 0% financing up to 72 months, or up to \$10,500* in rebates, and more for your trade than you ever thought possible, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

<<Name>>, bring this letter for admittance to this event and present it to an authorized sales representative at Shea Motor Company. Please stop by or call us at (888) 879-0301 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. This will be your only notification!

Monday, November 4, 2013.....8:00 a.m. – 6:00 p.m.
 Tuesday, November 5, 2013.....8:00 a.m. – 6:00 p.m.
 Wednesday, November 6, 2013.....8:00 a.m. – 6:00 p.m.
 Thursday, November 7, 2013.....8:00 a.m. – 6:00 p.m.
 Friday, November 8, 2013.....8:00 a.m. – 6:00 p.m.

Saturday, November 9, 2013.....9:00 a.m. – 3:00 p.m.
 Monday, November 11, 2013.....8:00 a.m. – 6:00 p.m.
 Tuesday, November 12, 2013.....8:00 a.m. – 6:00 p.m.
 Wednesday, November 13, 2013.....8:00 a.m. – 6:00 p.m.
 Thursday, November 14, 2013.....8:00 a.m. – 6:00 p.m.

Final Day of Event–November 14, from 8:00 a.m. – 6:00 p.m.

*On select vehicles.

Special Test Market Site

Shea Motor Company

510 Route 7 South • Middlebury, VT 05753

Sales Hours:

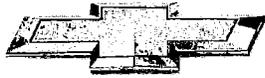
Mon.–Fri., 8:00 a.m.–6:00 p.m.
 Sat., 9:00 a.m.–3:00 p.m.
 Sun., Closed

For More Details, Call: **(888) 879-0301**
 Visit Us Online at: **www.sheamotorco.com**

WE WANT YOUR TRADE!

Please present this notification and one piece of identification to gain entrance to this private sales event.

Monday, November 4, 2013.....8:00 a.m. – 6:00 p.m.
 Tuesday, November 5, 2013.....8:00 a.m. – 6:00 p.m.
 Wednesday, November 6, 2013.....8:00 a.m. – 6:00 p.m.
 Thursday, November 7, 2013.....8:00 a.m. – 6:00 p.m.
 Friday, November 8, 2013.....8:00 a.m. – 6:00 p.m.
 Saturday, November 9, 2013.....9:00 a.m. – 3:00 p.m.
 Monday, November 11, 2013.....8:00 a.m. – 6:00 p.m.
 Tuesday, November 12, 2013.....8:00 a.m. – 6:00 p.m.
 Wednesday, November 13, 2013.....8:00 a.m. – 6:00 p.m.
 Thursday, November 14, 2013.....8:00 a.m. – 6:00 p.m.



OFFICIAL BUYBACK NOTICE!

up to
0% APR 60 mos.
 or up to
\$12,000*
 in rebates and discounts

INFORMATION ON THIS EXCLUSIVE BUYBACK PROGRAM:

Dear <<First Name>>,

Shea Motor Co. in Middlebury, Vermont, has been selected to be the host location for a unique Buyback Event. As a current owner of a highly sought after vehicle, you have been selected to be included in this event! We are in desperate need to acquire your pre-owned vehicle by **January 18** in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any **NEW 2014** or **2013**, or any late-model Certified Pre-Owned vehicle. With factory incentives like **0% financing up to 60 months**, or **up to \$12,000*** in rebates and discounts, and more for your trade than you ever thought possible, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

<<First Name>>, bring this letter for admittance to this event and present it to an authorized sales representative at Shea Motor Co. Please stop by or call us at (888) 879-0301 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. **This will be your only notification!**

- | | |
|---|--|
| Monday, January 6, 20148:00 a.m. – 6:00 p.m. | Tuesday, January 14, 20148:00 a.m. – 6:00 p.m. |
| Tuesday, January 7, 20148:00 a.m. – 6:00 p.m. | Wednesday, January 15, 20148:00 a.m. – 6:00 p.m. |
| Wednesday, January 8, 20148:00 a.m. – 6:00 p.m. | Thursday, January 16, 20148:00 a.m. – 6:00 p.m. |
| Thursday, January 9, 20148:00 a.m. – 6:00 p.m. | Friday, January 17, 20148:00 a.m. – 6:00 p.m. |
| Friday, January 10, 20148:00 a.m. – 6:00 p.m. | Saturday, January 18, 20148:00 a.m. – 4:00 p.m. |
| Saturday, January 11, 20148:00 a.m. – 4:00 p.m. | <i>Final Day of Event-January 18, from 8:00 a.m. – 4:00 p.m.</i> |
| Monday, January 13, 20148:00 a.m. – 6:00 p.m. | |

*On select vehicles.



WE WANT YOUR TRADE!

Shea Motor Co.

510 Route 1 South • Middlebury, VT 05753

Sales Hours:

Mon. – Fri. 8:00 a.m. – 6:00 p.m.
 Sat., 8:00 a.m. – 4:00 p.m.
 Sun., Closed

For More Details, Call: **(888) 879-0301**
 Visit Us Online at: **www.sheamotorco.com**

Please present this notification and one piece of identification to gain entrance to this private sales event.

- | | |
|-----------------------------|-----------------------|
| Monday, January 6, 2014 | 8:00 a.m. – 6:00 p.m. |
| Tuesday, January 7, 2014 | 8:00 a.m. – 6:00 p.m. |
| Wednesday, January 8, 2014 | 8:00 a.m. – 6:00 p.m. |
| Thursday, January 9, 2014 | 8:00 a.m. – 6:00 p.m. |
| Friday, January 10, 2014 | 8:00 a.m. – 6:00 p.m. |
| Saturday, January 11, 2014 | 8:00 a.m. – 4:00 p.m. |
| Monday, January 13, 2014 | 8:00 a.m. – 6:00 p.m. |
| Tuesday, January 14, 2014 | 8:00 a.m. – 6:00 p.m. |
| Wednesday, January 15, 2014 | 8:00 a.m. – 6:00 p.m. |
| Thursday, January 16, 2014 | 8:00 a.m. – 6:00 p.m. |
| Friday, January 17, 2014 | 8:00 a.m. – 6:00 p.m. |
| Saturday, January 18, 2014 | 8:00 a.m. – 4:00 p.m. |



OFFICIAL BUYBACK NOTICE!

0% for **60** mos.
APR
 or up to
\$12,000* in rebates

<<First Name>> <<Last Name>>
 <<Address>>
 <<City>>, <<State>> <<Zip>>

INFORMATION ON THIS EXCLUSIVE BUYBACK PROGRAM:

Dear <<First Name>>,

Springfield Buick GMC in North Springfield, VT, has been selected to be the host location for a unique Buyback Event. As a current owner of a highly sought after vehicle, you have been selected to be included in this event!

We are in desperate need to acquire your pre-owned vehicle by **November 27** in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any **NEW 2014 or 2013**, or any late-model Certified Pre-Owned vehicle. With factory incentives like **0% financing for 60 months**, or up to **\$12,000* in rebates**, and **more for your trade than you ever thought possible**, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

<<First Name>>, **bring this letter for admittance** to this event and present it to an authorized sales representative at Springfield Buick GMC. Please stop by or call us at (888) 829-5253 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. **This will be your only notification!**

Wednesday, November 13, 20139:00 a.m. – 7:00 p.m.
 Thursday, November 14, 2013.....9:00 a.m. – 7:00 p.m.
 Friday, November 15, 2013.....9:00 a.m. – 7:00 p.m.
 Saturday, November 16, 2013.....9:00 a.m. – 5:00 p.m.
 Monday, November 18, 2013.....9:00 a.m. – 7:00 p.m.
 Tuesday, November 19, 2013.....9:00 a.m. – 7:00 p.m.
 Wednesday, November 20, 20139:00 a.m. – 7:00 p.m.

Thursday, November 21, 2013.....9:00 a.m. – 7:00 p.m.
 Friday, November 22, 2013.....9:00 a.m. – 7:00 p.m.
 Saturday, November 23, 2013.....9:00 a.m. – 5:00 p.m.
 Monday, November 25, 20139:00 a.m. – 7:00 p.m.
 Tuesday, November 26, 2013.....9:00 a.m. – 7:00 p.m.
 Wednesday, November 27, 2013.....9:00 a.m. – 7:00 p.m.

Final Day of Event–November 27, from 9:00 a.m. – 7:00 p.m.

*On select vehicles.

Special Test Market Site

WE WANT YOUR TRADE!

SPRINGFIELD BUICK GMC

We Service All Makes and Models!
 431. River St. • North Springfield, VT 05150

Sales Hours:

Mon.–Fri., 9:00 a.m.–7:00 p.m.
 Sat., 9:00 a.m.–5:00 p.m.
 Sun., Closed

For More Details, Call: **(888) 829-5253**
 Visit Us Online at: **www.springfieldbuickgmc.com**

Please present this notification and one piece of identification to gain entrance to this private sales event.

Wednesday, November 13, 2013 9:00 a.m. – 7:00 p.m.
 Thursday, November 14, 2013 9:00 a.m. – 7:00 p.m.
 Friday, November 15, 2013 9:00 a.m. – 7:00 p.m.
 Saturday, November 16, 2013 9:00 a.m. – 5:00 p.m.
 Monday, November 18, 2013 9:00 a.m. – 7:00 p.m.
 Tuesday, November 19, 2013 9:00 a.m. – 7:00 p.m.
 Wednesday, November 20, 2013 9:00 a.m. – 7:00 p.m.
 Thursday, November 21, 2013 9:00 a.m. – 7:00 p.m.
 Friday, November 22, 2013 9:00 a.m. – 7:00 p.m.
 Saturday, November 23, 2013 9:00 a.m. – 5:00 p.m.
 Monday, November 25, 2013 9:00 a.m. – 7:00 p.m.
 Tuesday, November 26, 2013 9:00 a.m. – 7:00 p.m.
 Wednesday, November 27, 2013 9:00 a.m. – 7:00 p.m.



GMC

OFFICIAL BUYBACK NOTICE!

0% *for* **60** mos.
APR
or up to
\$12,000* in rebates

<<First Name>> <<Last Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

INFORMATION ON THIS EXCLUSIVE BUYBACK PROGRAM:

Dear <<First Name>>,

Springfield Buick GMC in North Springfield, VT, has been selected to be the host location for a unique Buyback Event. As a current owner of a highly sought after vehicle, you have been selected to be included in this event!

We are in desperate need to acquire your pre-owned vehicle by **January 4** in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any **NEW 2014 or 2013**, or any late-model Certified Pre-Owned vehicle. With factory incentives like **0% financing for 60 months**, or **up to \$12,000* in rebates**, and **more for your trade than you ever thought possible**, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

<<First Name>>, **bring this letter for admittance** to this event and present it to an authorized sales representative at Springfield Buick GMC. Please stop by or call us at (888) 829-5253 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. This will be your only notification!

Monday, December 16, 2013 9:00 a.m. – 7:00 p.m.
Tuesday, December 17, 2013 9:00 a.m. – 7:00 p.m.
Wednesday, December 18, 2013 9:00 a.m. – 7:00 p.m.
Thursday, December 19, 2013 9:00 a.m. – 7:00 p.m.
Friday, December 20, 2013 9:00 a.m. – 7:00 p.m.
Saturday, December 21, 2013 9:00 a.m. – 5:00 p.m.
Monday, December 23, 2013 9:00 a.m. – 7:00 p.m.
Tuesday, December 24, 2013 9:00 a.m. – 3:00 p.m.
Thursday, December 26, 2013 9:00 a.m. – 7:00 p.m.

Friday, December 27, 2013 9:00 a.m. – 7:00 p.m.
Saturday, December 28, 2013 9:00 a.m. – 5:00 p.m.
Monday, December 30, 2013 9:00 a.m. – 7:00 p.m.
Tuesday, December 31, 2013 9:00 a.m. – 3:00 p.m.
Thursday, January 2, 2014 9:00 a.m. – 7:00 p.m.
Friday, January 3, 2014 9:00 a.m. – 7:00 p.m.
Saturday, January 4, 2014 9:00 a.m. – 5:00 p.m.

Final Day of Event—January 4, from 9:00 a.m. – 5:00 p.m.

*On select vehicles.



WE WANT YOUR TRADE!

SPRINGFIELD BUICK GMC

We Service All Makes and Models!
431 River St. • North Springfield, VT 05150

Sales Hours:
Mon.–Fri., 9:00 a.m.–7:00 p.m.
Sat., 9:00 a.m.–5:00 p.m.
Sun., Closed

For More Details, Call: **(888) 829-5253**
Visit Us Online at: **www.springfieldbuickgmc.com**

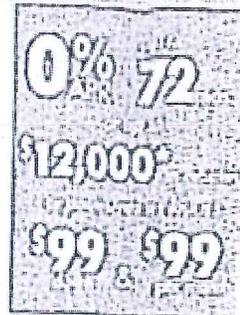
Please present this notification and one piece of identification to gain entrance to this private sales event.

Monday, December 16, 2013 9:00 a.m. – 7:00 p.m.
Tuesday, December 17, 2013 9:00 a.m. – 7:00 p.m.
Wednesday, December 18, 2013 9:00 a.m. – 7:00 p.m.
Thursday, December 19, 2013 9:00 a.m. – 7:00 p.m.
Friday, December 20, 2013 9:00 a.m. – 7:00 p.m.
Saturday, December 21, 2013 9:00 a.m. – 5:00 p.m.
Monday, December 23, 2013 9:00 a.m. – 7:00 p.m.
Tuesday, December 24, 2013 9:00 a.m. – 3:00 p.m.
Thursday, December 26, 2013 9:00 a.m. – 7:00 p.m.
Friday, December 27, 2013 9:00 a.m. – 7:00 p.m.
Saturday, December 28, 2013 9:00 a.m. – 5:00 p.m.
Monday, December 30, 2013 9:00 a.m. – 7:00 p.m.
Tuesday, December 31, 2013 9:00 a.m. – 3:00 p.m.
Thursday, January 2, 2014 9:00 a.m. – 7:00 p.m.
Friday, January 3, 2014 9:00 a.m. – 7:00 p.m.
Saturday, January 4, 2014 9:00 a.m. – 5:00 p.m.



GMC

OFFICIAL BUYBACK NOTICE



INFORMATION REGARDING THIS EXCLUSIVE BUYBACK PROGRAM

Capitol City Buick GMC in Berlin, Vermont, has been selected to be the host location for a unique Buyback Event. As a current owner of a highly sought after vehicle, you have been selected to be included in this event.

We are in desperate need to acquire your pre-owned vehicle by November 7 in order to fulfill special used vehicle requests. Our records indicate you own one of these vehicles, and our sales managers have been authorized to buy back your vehicle at top dollar!

We would like to exchange your vehicle with any NEW 2014 or 2013, or any late-model Certified Pre-Owned vehicle. With factory incentives like 0% financing up to 72 months, or up to \$12,000* in rebates, and more for your trade than you ever thought possible, we feel confident that you can make this exchange with little or no out-of-pocket expense and with a monthly payment that fits your budget.

Also, bring this letter for admittance to this event and present it to an authorized sales representative at Capitol City Buick GMC. Please stop by or call us at (888) 567-1410 to schedule a convenient appointment and allow us the opportunity to make an offer. A visual inspection of your vehicle is required to assess its value. Due to the nature of this event, it will not be advertised to the general public. This will be your only notification!

Monday, October 28, 2013 8:00 a.m. - 6:00 p.m.
 Tuesday, October 29, 2013 8:00 a.m. - 6:00 p.m.
 Wednesday, October 30, 2013 8:00 a.m. - 6:00 p.m.
 Thursday, October 31, 2013 8:00 a.m. - 6:00 p.m.
 Friday, November 1, 2013 8:00 a.m. - 6:00 p.m.
 Saturday, November 2, 2013 8:00 a.m. - 5:00 p.m.

Monday, November 4, 2013 8:00 a.m. - 6:00 p.m.
 Tuesday, November 5, 2013 8:00 a.m. - 6:00 p.m.
 Wednesday, November 6, 2013 8:00 a.m. - 6:00 p.m.
 Thursday, November 7, 2013 8:00 a.m. - 6:00 p.m.
 Final Day of Event - November 7, from 8:00 a.m. - 6:00 p.m.

*Up to \$12,000



CAPITOL CITY BUICK GMC

We Service All Makes and Models
1162 U.S. Rt 2 • Berlin, VT 05602

Sales Hours:
Mon.-Fri., 8:00 a.m.-6:00 p.m.
Sat., 8:00 a.m.-5:00 p.m.
Sun., Closed

For More Details, Call (888) 567-1410
Visit Us Online at www.capitolcityautos.com

WE WANT YOUR TRADE!

Please present this notification and any proof of identification to gain admittance to this private sales event.

Monday, October 28, 2013 8:00 a.m. - 6:00 p.m.
 Tuesday, October 29, 2013 8:00 a.m. - 6:00 p.m.
 Wednesday, October 30, 2013 8:00 a.m. - 6:00 p.m.
 Thursday, October 31, 2013 8:00 a.m. - 6:00 p.m.
 Friday, November 1, 2013 8:00 a.m. - 6:00 p.m.
 Saturday, November 2, 2013 8:00 a.m. - 5:00 p.m.
 Monday, November 4, 2013 8:00 a.m. - 6:00 p.m.
 Tuesday, November 5, 2013 8:00 a.m. - 6:00 p.m.
 Wednesday, November 6, 2013 8:00 a.m. - 6:00 p.m.
 Thursday, November 7, 2013 8:00 a.m. - 6:00 p.m.