

STATE OF RHODE ISLAND
DEPARTMENT OF BUSINESS REGULATION
INSURANCE DIVISION

IN THE MATTER OF:

**Carfax, Inc. and CARFAX Total Loss Valuation
Service Application**

2020-IN-001

APPLICANTS

**Pursuant to R.I. Gen. Laws 27-9.1-4(25) and
230-RICR-20-40-2.8(A)(2)(c)**

**THE AUTO BODY ASSOCIATION OF RHODE ISLAND'S FINAL ADDITIONAL
COMMENTS IN OBJECTION TO CARFAX, INC., AND CARFAX TOTAL LOSS
VALUATION SERVICE'S PETITION FOR APPROVAL PURSUANT TO INSURANCE
REGULATION 230-RICR-20-40-2(C)**

On April 27, 2020, The Auto Body Association of Rhode Island (ABARI) timely filed its objection to Carfax, Inc.'s (CARFAX) petition for approval pursuant to Insurance Regulation 230-RICR-202-40-2(c). On May 4, 2020 a public hearing was held via telephone conference with interested parties in attendance, including ABARI, at which time the Hearing Officer ordered an additional written comment period ending on May 18, 2020.

A. CARFAX's Petition does not meet any requirement delineated R.I. Gen. Laws §27-9.1-4(25) or in the Department's Decision in Mitchell International.

During the May 4, 2020 hearing, Associate General Counsel for CARFAX, Attorney Bassou, acknowledged that CARFAX accepts the Department's decision in Mitchell International, Inc. dated June 21, 2018. This admission is critical as CARFAX did not make any

legal arguments regarding the Department's interpretation of the consumer protection law at issue in its filings with the Department and at Hearing. Therefore, the only question presented is whether CARFAX's application meets the standards delineated in the Department's previous order. ABARI relies upon its initial filing in support of its position that CARFAX's petition does not meet any of the criteria, however, will briefly further summarize again.

1. Carfax's Total Loss Valuation Service is not used by the Automotive Industry in Rhode Island.

CARFAX's Total Loss Valuation Service provided by its web portal "Carfaxforclaims.com" is not used by the automotive industry. CARFAX argues that its vehicle valuation service is used by the automotive industry as 75% of franchise dealers use Carfax "products and services." Notably absent are any statistics regarding dealers that use the Carfax Total Loss Valuation Service, or the vehicle valuation tool. As noted previously, Carfax's vehicle history report service is used widely in the automotive industry, yet this service is entirely irrelevant to its petition with the Department. ABARI demonstrated in a random survey of many of the largest auto dealers in Rhode Island that CARFAX values are not used to determine retail values. Though CARFAX's popular vehicle history reports can be found in many online advertisements of vehicles for sale in Rhode Island, the vast majority do not include CARFAX vehicle values. In fact, as discussed in its initial filing, any dealer using a CARFAX value in an advertisement, and they are few and far between, did so for the sole purpose of demonstrating that their asking price was below Carfax's value. Therefore, this in and of itself proves that dealers do not use CARFAX to value vehicles. In order for CARFAX's petition to meet the standard, one would have to walk into a dealership requesting a vehicle value, and the sales representative would say, "just a minute, let me look up the Carfax value." That does not happen and is not the current state of the automotive industry in Rhode Island.

In the May 17th edition of the Providence Journal, Anchor Auto Group printed a full page advertisement imploring Rhode Islanders to buy vehicles in Rhode Island to help bridge the increasingly unfathomable budget gap worsened by the COVID19 pandemic. In that ad it notes “Used Vehicles make up a larger share of the market, some 3-4 times the amount of sales, but their average transacted prices, according to **Kelley Blue Book** are lower at \$20,200.” It further states “According to **Kelley Blue Book** the average cost of a new vehicle in 2019 was \$37,285.” (Exhibit 1). Notably Anchor Auto Group does not declare “according to Carfax...”

During the Hearing on May 4, 2020, Associate General Counsel for CARFAX complained that ABARI’s survey was not scientific and attempted to dismiss it. However, all information provided can be confirmed as each respondent could be contacted for accuracy. It was CARFAX’s burden to prove the automotive industry in Rhode Island uses its valuation service to determine retail values, and it failed to do so, because it cannot prove what does not exist. Instead CARFAX argued that the automobile rental industry uses its valuation services. The Department has already determined that the “automobile rental industry” is not part of the automotive industry, therefore this alleged fact is irrelevant to its petition. The sole fact remains, CARFAX vehicle values are not used by Rhode Island automobile dealers to determine retail values, as such its petition should be denied.

2. Carfax’s Total Loss Valuation Service is not a “current edition of a nationally recognized compilation of retail values.”

CARFAX’s database, for the purpose of this petition, is no different from that proposed in Mitchell in that it relies upon a snapshot of a moment in time. It is updated weekly, and cannot be described as a current edition of anything. It is a database that is not a current edition of a nationally recognized compilation of retail values. Carfax Total Loss Valuation Service is

not available to the public in the form provided to insurers. This fact is not in dispute. Though the value arrived at may be available, the method is not. Therefore, the only relevant distinction between CARFAX and Mitchell is that CARFAX provides the insurer with more data than that included in Mitchell's 2018 filing. This fact however does not make CARFAX's service meet the requirements of the law anymore than Mitchell's did, and its petition should be denied.

3. CARFAX's Petition does not meet the additional requirements of R.I. Gen. Laws §27-9.1-(25)(iv) as amended in 2019.

In 2019 the Legislature remained concerned with the rights of consumers when a vehicle is deemed a total loss by an insurer. That concern was evidenced in an amendment to the law regarding condition adjustments:

“(iv) If condition adjustments are made to the retail value of a motor vehicle designated a total loss, all such adjustments must be in accordance with the standards set forth in the current edition of a nationally recognized compilation of retail values, commonly used by the automotive industry, used by the insurer to determine the retail value of the of the vehicle; and all such adjustments, including prior damage deductions, must be itemized, fair and reasonable.”

R.I Gen. Laws §27-9.1-4(25)(iv)

In its previous filing, ABARI discussed at length the arbitrary adjustments found in the sample “Total Loss Valuation Report” included in CARFAX's petition. Of important note is the fact that the report, contrary to the requirements of the statute, does not itemize any adjustments made to determine the value of the vehicle. (Exhibit 2). There are no dollar amounts provided for any metric used to value the vehicle, whether the result was an increase or decrease in value, from the comparison vehicles. According to the law the adjustments must be itemized, and in accordance with the standards set forth in “the current addition of a nationally recognized compilation of retail values, commonly used by the automotive industry.” CARFAX's petition is

silent to the method used for the adjustments, fails to itemize the adjustments with a dollar amount, and therefore cannot prove the reasonableness of its valuation. The consumer has no idea which metric increased its vehicle value, or decreased its value and has no way to challenge such adjustments. Therefore, CARFAX's Total Loss Valuation Service cannot meet the old, or new requirements of the law.

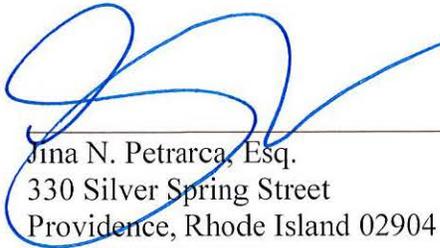
B. Conclusion

After ample opportunity CARFAX has failed to meet its burden to prove it complies with the requirements of R.I. Gen. Laws §27-9.1-4(25). The law was passed and signed by Governor Chaffee to protect consumers from the dangers of insurer-based vehicle valuation services. As millions of vehicles are bought and sold every single day in America, why does a specific, non-publicly available system (Carfax Total Loss Valuation Service is not publicly available) need to be used by insurers. Why must the proverbial wheel be reinvented? There have been few, if any, complaints from consumers since the law was passed in 2013, based upon the approved sources currently used in Rhode Island, namely NADA and Kelley Blue Book. These sources were and are still today current editions of nationally recognized compilation of retail values commonly used in the Automotive Industry in Rhode Island, and do not require an insurer to purchase a "valuation service." Each side of the claim, insurer and consumer alike, are able to access the same information, and it works. The statute has been a success in ensuring consumers receive a fair amount through a transparent claims process when settling their total losses. To approve CARFAX's petition would be to ignore that the statute and its intent ever existed.

As ABARI noted at the hearing, if CARFAX or anyone else believes the statutory structure is problematic for consumers, they can seek the assistance of the Legislature. However,

there is no evidence of such a need, and as currently written, the law does not allow a service like Carfax Total Loss Valuation Service for the reasons stated herein.

Respectfully Submitted,
Auto Body Association of Rhode Island
By Its Attorneys
Petrarca & Petrarca Law Offices

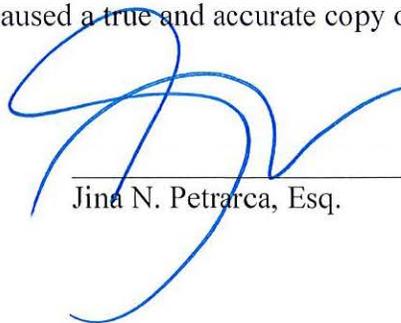


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CERTIFICATION

I hereby certify that on this 18th day of May I caused a true and accurate copy of the foregoing to be emailed to:

Catherine Warren, Esq.
Catherine.warren@doa.ri.gov



Jina N. Petrarca, Esq.

EXHIBIT 1

"We need money. You cannot balance the budget that is \$200 million in the hole without doing some difficult things. I just have to find some money. It could come from an income tax, it could come from a sales tax, it could come from a fee."

- Gina Raimondo, Governor of Rhode Island, December 2019

"According to the report "Economic Fallout of the Covid-19 Pandemic in New England," Rhode Island is set for massive budget shortfalls -- estimated to be \$400 to \$460 million."

The Federal Reserve Bank of Boston, April 2020

"If everyone's spending their money, I'd prefer you spend it in Rhode Island."

- Gina Raimondo, Governor of Rhode Island, April 2020

Dear Rhode Island resident,

As a RI business owner for over 30 years, I wanted to bring something to the attention of my fellow Rhode Islanders.

What I am about to share with you is in no way meant to reflect negatively on the businesses over the state line in Massachusetts, but it is a tax situation that has been going on for years. Now more than ever, as the loss of tax revenue is mounting and the financial condition in RI continues to deteriorate, it is important for Rhode Islanders to understand and take action before we as a state reach a critical point. Judging by these quotes and headlines, we may have reached that point already.

In most cases, when people in Rhode Island purchase vehicles they are not thinking about where the tax money goes. They know they have to pay 7% sales tax on their purchase and they assume it goes to the RI registry and on to the RI Division of Taxation. When a Rhode Islander leaves RI and purchases a vehicle in another state the assumption is that the tax money will come back to RI because the vehicle is being registered in RI. In most all cases that is true.

However, in the case of Massachusetts, that is not true. When a RI resident goes to a dealer in the state of Massachusetts, 6.25% (Mass sales tax rate) of the 7% sales tax paid by the RI resident, STAYS in the state of Massachusetts and RI retains only .75%. That's correct, Massachusetts and RI have a tax agreement that says the tax money paid stays in the state where the sale took place, NOT where it gets registered. You may be asking yourself, why does it matter? Doesn't it all equal out? The simple answer is NO. Looking at the number of sales and the subsequent tax revenue being lost to Massachusetts for them to use in their budgets may surprise you. Here are the numbers...

Every month the number of Rhode Islanders that go to Mass to purchase new vehicles is about 2500 per month. The number of Mass residents who come to RI monthly to purchase new vehicles is about 500. So, there is a net effect of 2000 more new vehicle sales taking place in Mass monthly. As you will see the lost tax revenue is STAGGERING.

According to Kelley Blue Book the average cost of a new vehicle in 2019 was \$37,265.

MONTHLY NEW VEHICLE SALES ...	2000
AVG. TRANSACTED PRICE.....	x \$37,000
TAXABLE SALES.....	\$74,000,000 x 6.25% = \$4,625,000/ month in tax revenue
\$4,625,000 MO. X 12 MOS. = \$55.5 MILLION PER YEAR.	

Used vehicles make up a larger share of the market, some 3 to 4 times the amount of sales but their average transacted prices, according to Kelley Blue Book, are lower at \$20,200. If we use 3 times the amount of new vehicle sales monthly, 6000 sales, the numbers are as follows.

MONTHLY USED VEHICLE SALES ...	6000
AVG. TRANSACTED PRICE.....	x \$20,200
TAXABLE SALES.....	\$121,200,000 x 6.25% = \$7,575,000/ month in tax revenue
\$7,575,000 MO. X 12 MOS. = \$90.9 MILLION PER YEAR.	

TOTAL LOST SALES TAX REVENUE ...	\$55.5 million new vehicle + \$90.9 million used vehicle
\$145.5 MILLION PER YEAR TOTAL LOST SALES TAX REVENUE	

These numbers are from the latest sales data available. Now, if you think these numbers seem high, do what one of my teachers once told me to do. If you don't believe a number, cut it in half. He then said, "Does that make you feel better?"

Before the Coronavirus situation, in December of 2019, our Governor said, "We need money." "You cannot balance the budget that is \$200 million in the hole without doing some difficult things." Also "I just have to find some money." "It could come from an income tax, it could come from a sales tax, it could come from a fee." The Coronavirus has only intensified the situation with normal sales tax revenue streams being decimated.

But there is good news! We Rhode Islanders can add as much as \$145.5 million to the RI budget every year without raising a single tax or a single fee. By simply spending the money that we are already spending, just doing it at home, here in Rhode Island. Supporting each other and each other's RI businesses is a win - win.

If you're in the market for a major purchase like a vehicle or furniture etc., stop and think. Think about the wonderful, locally owned Rhode Island businesses who not only generate this sales tax revenue that is so desperately needed for our state, but employ so many of our friends and family. Think about the win - win you create by buying Rhode Island.

Sincerely,

Robert Benoit
President, Anchor Auto Group

EXHIBIT 2



TOTAL LOSS VALUATION REPORT

Claim Number: 1234

Prepared for Homeland United Automotive Insurance

Your Claim Information

Subject Vehicle: 2015 Honda Civic LX
 VIN: 19XFB2F57FE272290
 Odometer: 31,456 miles
 Zip Code: 20120

Claim Number: 1234
 Date of Loss: 05/15/2019
 Report Date: 05/17/2019

Your Vehicle Value

Your Vehicle

How CARFAX Calculated Value	Worth Less	Worth More
<p>Step 1 Identified the vehicle's EQUIPMENT</p> <ul style="list-style-type: none"> ✓ Sedan 4 DR ✓ 1.8 L I4 F SOHC 16V ✓ Gasoline ✓ Convenience Package ✓ Technology Package ✓ Moonroof / Sunroof ✓ Simulated Alloy Interior Trim 	<p>Base model</p> <p>Fully equipped</p>	
<p>Step 2 Assessed pre-accident CONDITION</p> <ul style="list-style-type: none"> 📄 Good 🏁 31,456 miles 	<p>Poor Condition</p> <p>Excellent Condition</p> <p>High Mileage</p> <p>Low Mileage</p>	
<p>Step 3 Analyzed local MARKET supply</p> <ul style="list-style-type: none"> 📍 20120 	<p>More supply</p> <p>Less Supply</p>	
<p>Step 4 Adjusted for pre-accident VEHICLE HISTORY</p> <ul style="list-style-type: none"> 🚗 No Accidents/Damage Reported 👤 1-Owner 🛢️ Regular Oil Changes 🏠 Personal Vehicle 	<p>Accident/Damage</p> <p>No Accident/Damage</p> <p>Multiple Owners</p> <p>1-Owner</p> <p>Poorly Serviced</p> <p>Well Maintained</p> <p>Taxi Use</p> <p>Personal Use</p>	
<p>Step 5 Computed a VIN-SPECIFIC VALUE</p>	<p style="font-size: 24px; font-weight: bold;">Your Vehicle's Value</p> <p style="font-size: 36px; font-weight: bold;">\$13,870</p>	



TOTAL LOSS VALUATION REPORT

Claim Number: 1234

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Valuation Methodology

How CARFAX Calculated Value	
<p>Step 1 Identified the vehicle's EQUIPMENT</p>	<p>An appraiser inspected your vehicle, confirming the year, make, model, trim level, and options. A vehicle with more equipment/options is generally worth more than a base model with less equipment and/or fewer options.</p> <p>CARFAX's proprietary statistical regression model analyzes pricing data from millions of used car listings along with each vehicle's unique trim and options. This model evaluated your vehicle's equipment and determined the impact on your vehicle's value.</p> <p>Please note that some options do not have a material impact on a vehicle's value. Likewise, aftermarket parts are not included in CARFAX's value assessment but may be considered by your insurance company as part of the claim settlement.</p>
<p>Step 2 Assessed pre-accident CONDITION</p>	<p>An appraiser assessed the condition of your vehicle in 7 different areas (see page 3). Since the appraiser is unable to view your vehicle prior to your recent accident, they have estimated pre-accident condition as poor, fair, good, or excellent based on a set of objective standards. These details were used to arrive at an overall condition for the vehicle.</p>
<p>Step 3 Analyzed local MARKET supply</p>	<p>Fewer similar vehicles in a geographic area means buyers are willing to pay more for those vehicles. CARFAX analyzed the supply and demand for vehicles of like kind, quality, and history in your area and adjusted your vehicle's value accordingly. We used an area with a dynamic radius starting at 10 miles from the geographic center of the zip code where your vehicle is located.</p>
<p>Step 4 Adjusted for pre-accident VEHICLE HISTORY</p>	<p>CARFAX has the world's largest vehicle history database and we take your vehicle's unique history into consideration when assessing its value.</p> <p>All things being equal, a vehicle with no prior damage is perceived to be worth more than one with a previous accident. Likewise, car buyers tend to pay a premium for one-owner vehicles and those with a well-documented service history. CARFAX quantifies these and other factors, incorporating recency, frequency, and severity to determine the impact on your vehicle's value.</p>
<p>Step 5 Computed a VIN-SPECIFIC VALUE</p>	<p>This is your vehicle's unique value based on its unique combination of equipment, pre-accident condition, market supply, and pre-accident vehicle history.</p> <p>This value does not consider taxes, fees, your deductible, and other items that will impact your final insurance settlement value. This is the value of your vehicle prior to your recent accident and based on the information provided by the appraiser and other sources.</p>



TOTAL LOSS VALUATION REPORT

Claim Number: 1234

Prepared for Homeland United Automotive Insurance

Your Vehicle Details

Aftermarket Parts

1. Rear-spoiler
2. Tinted Windows

Vehicle Condition

Overall Condition GOOD	Guideline: No major mechanical problems and only minor cosmetic flaws.
Condition Details	
Body: GOOD	Guideline: Some minor dents; no rust; no repairs required. Inspection Notes: Small dings on the driver and passenger doors
Exterior Trim: GOOD	Guideline: Minor wear or dings on side moldings; stone chips or slight peeling on the front grille. Inspection Notes: 2 small stone chips on front grille
Glass: FAIR	Guideline: May have wiper blade streaks or stone chips on windshield; other glass may have scratches; meet state's minimum safety standards. Inspection Notes: Small scratch on passenger-side windshield
Interior: GOOD	Guideline: Some surfaces reflect slight wear (carpet, arm rests, seat cushions, console tops) but no rips, stains or burns; some detailing required. Inspection Notes: Slight wear on driver and headrest
Mechanical: GOOD	Guideline: No fluid or exhaust leaks; some sediment on engine surfaces; runs and shifts fine. Inspection Notes: No leaks or engine grime visible
Paint: GOOD	Guideline: Some slight panel refinish flaws like nicks, stone chips or minor scratches that do not reach bare metal; no visible rust. Inspection Notes: Minor scratches on hood
Tires: GOOD	Guideline: Matched set of 4 tires with tread depth above driving standards; no tears or gouges. Inspection Notes: 4 matching Michelin tires with 4/32 tread depth remaining



TOTAL LOSS VALUATION REPORT

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Vehicle Comparison

The following vehicles were available for purchase on the CARFAX Used Car Listings (www.Carfax.com/cars-for-sale) as of the Report Date and are representative of comparable in-market vehicles currently for sale. These vehicles were selected for display based on similar year, make, model, trim, location, mileage, and/or vehicle history compared to your car.

	Your Car 2015 Honda Civic LX	In-Market Vehicle 1 2015 Honda Civic LX	In-Market Vehicle 2 2015 Honda Civic LX	In-Market Vehicle 3 2015 Honda Civic LX
History-Based Value @ Good Condition	\$13,870	\$12,740	\$13,420	\$13,830
Mileage	31,456 miles	34,657 miles	31,802 miles	31,472 miles
Vehicle History				
Accident/Damage	No Accidents Reported	Damage Reported	Damage Reported	No Accidents Reported
Ownership	1-Owner Vehicle	Multiple Owners	1-Owner Vehicle	Multiple Owners
Service	Service History	Service History	Service History	Service History
Use Type	Personal Vehicle	Personal Vehicle	Rental Vehicle	Non-personal Vehicle
Listed For Sale At		DARCARS Pre-Owned 10620 Fairfax Blvd, Fairfax, VA 22030 (1.5 miles away) 703-385-0500 View Listing	Fairfax Motors 9909 Main St, Fairfax, VA 22031 (2 miles away) 703-996-4927 View Listing	AP Fairfax 9711 Fairfax Blvd, Fairfax, VA 22030 (3 miles away) 888-278-5933 View Listing
Equipment				
Body Style	Sedan	Sedan	Sedan	Sedan
Engine	1.8L I4 F SOHC 16V	1.8L I4 F SOHC 16V	1.8L I4 F SOHC 16V	1.8L I4 F SOHC 16V
Drive Type	FWD	FWD	FWD	FWD
Fuel	Gasoline	Gasoline	Gasoline	Gasoline
Exterior Color	Red	Red	Red	Red
Interior Color	Black	Black	Black	Black
Alloy Wheels	✓	✓	✓	✓
Anti-Lock Brakes	✓	✓	✗	✓
Anti-Theft System	✓	✗	✓	✓
Console Storage	✓	✓	✗	✗
Cruise Control	✓	✓	✓	✓
Drivers Side Air Bag	✓	✓	✓	✓



TOTAL LOSS VALUATION REPORT

Claim Number: 1234

Prepared for Homeland United Automotive Insurance

	Your Car	In-Market Vehicle 1	In-Market Vehicle 2	In-Market Vehicle 3
Equipment				
Front Side Impact Air Bags	✓	✓	✓	✓
Hands Free Bluetooth Phone	✗	✓	✓	✓
Head/Curtain Air Bags	✓	✓	✓	✓
Keyless Entry	✓	✓	✗	✓
Leather (or Cloth) Seats	✓	✗	✓	✓
Passenger Air Bag	✓	✓	✓	✓
Power Liftgate	✗	✗	✗	✗
Rear Air Bag	✓	✓	✓	✓
Rearview Camera	✓	✗	✗	✓
Satellite Radio	✓	✓	✓	✓
Stability Control	✓	✓	✓	✓
Steering Wheel Mounted Controls	✓	✓	✓	✓
Tinted Glass	✗	✓	✓	✓
Tire Pressure Monitoring System	✓	✗	✓	✓
Traction Control	✓	✓	✓	✗



TOTAL LOSS VALUATION REPORT

Claim Number: 1234

Prepared for Homeland United Automotive Insurance

CARFAX Vehicle History Report

CARFAX® Vehicle History Report™
An independent company established in 1986

Vehicle Information: 2015 HONDA CIVIC LX VIN: 19XFB2F57FE272290 SEDAN 4 DR 1.8L I4 SOHC 16V GASOLINE FRONT WHEEL DRIVE <small>Standard Equipment Safety Options</small>	<div style="display: flex; flex-direction: column; gap: 10px;"> <div style="display: flex; align-items: center;"> <input checked="" style="margin-right: 5px;" type="checkbox"/> No accidents reported to CARFAX </div> <div style="display: flex; align-items: center;"> <input checked="" style="margin-right: 5px;" type="checkbox"/> No damage reported to CARFAX </div> <div style="display: flex; align-items: center;"> 1 CARFAX 1-Owner vehicle </div> <div style="display: flex; align-items: center;"> 4 Service history records </div> <div style="display: flex; align-items: center;"> Personal lease vehicle </div> <div style="display: flex; align-items: center;"> 28,513 Last reported odometer reading </div> </div>	
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This CARFAX Vehicle History Report is based only on information supplied to CARFAX and available as of 4/23/19 at 11:01:38 AM (CDT). 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.

CARFAX Ownership History	Owner 1
The number of owners is estimated	
Year purchased	2015
Type of owner	Personal lease
Estimated length of ownership	3 yrs. 7 mo.
Owned in the following states/provinces	New York
Estimated miles driven per year	7,834/yr
Last reported odometer reading	28,513

CARFAX Title History	Owner 1
CARFAX guarantees the information in this section	
Salvage Junk Rebuilt Fire Flood Hall 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	

CARFAX Additional History	Owner 1
Not all accidents / issues are reported to CARFAX	
Total Loss No total loss reported to CARFAX.	<input checked="" type="checkbox"/> No Issues Reported
Structural Damage No structural damage reported to CARFAX.	<input checked="" type="checkbox"/> No Issues Reported



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Airbag Deployment No airbag deployment reported to CARFAX.	<input checked="" type="checkbox"/> No Issues Reported
Odometer Check No indication of an odometer rollback.	<input checked="" type="checkbox"/> No Issues Indicated
Accident / Damage No accidents or damage reported to CARFAX.	<input checked="" type="checkbox"/> No Issues Reported
Manufacturer Recall No open recalls reported to CARFAX. Check with an authorized <u>Honda dealer</u> for any open recalls.	<input checked="" type="checkbox"/> No Recalls Reported

CARFAX Detailed History		Glossary		
Owner 1	Date:	Mileage:	Source:	Comments:
Owner 1 Purchased: 2015 Type: Personal lease Where: New York Est. miles/year: 7,834/yr Est. length owned: 7/23/15 - 3/4/19 (3 yrs. 7 mo.) Low mileage! This owner drove less than the industry average of 15,000 miles per year. 	07/02/2015		Paragon Honda Woodside, NY 718-507-5000 paragonhonda.com 4.1 ★★★★★ 405 Verified Reviews	Vehicle offered for sale
	07/21/2015	2	New York Inspection Station	Dealer had vehicle inspected to prepare it for sale Passed safety inspection Emissions inspection performed View what was inspected
	07/22/2015	4	Paragon Honda Woodside, NY 718-507-5000 paragonhonda.com 4.1 ★★★★★ 405 Verified Reviews	Pre-delivery inspection completed Fluids checked
	07/23/2015		Paragon Honda Woodside, NY 718-507-5000 paragonhonda.com 4.1 ★★★★★ 405 Verified Reviews	Vehicle sold
	07/23/2015		New York Motor Vehicle Dept. Staten Island, NY	Registration issued or renewed Titled or registered as personal lease vehicle Passed safety inspection
	08/11/2015		New York Motor Vehicle Dept. Holyoke, MA	Title issued or updated First owner reported Titled or registered as personal lease vehicle
				Two states? Vehicle leasing companies often title a car in one state but register it to be driven in another.
	11/12/2015	4,638	Paragon Honda Woodside, NY 718-507-5000	Vehicle serviced



TOTAL LOSS VALUATION REPORT

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		paragonhonda.com 4.1 ★ ★ ★ ★ ★ 405 Verified Reviews	
07/28/2016	14,257	New York Inspection Station	Passed safety inspection Emissions inspection performed View what was inspected
02/14/2017	20,369	Prela Enterprises Bayside, NY 718-357-3844 5.0 ★ ★ ★ ★ ★ 102 Verified Reviews	Emissions or safety inspection performed
02/14/2017		New York Inspection Station	Passed safety inspection Passed emissions inspection View what was inspected
06/07/2017		New York Motor Vehicle Dept. Staten Island, NY	Registration issued or renewed Titled or registered as personal lease vehicle Passed safety inspection
05/08/2018		Prela Enterprises Bayside, NY 718-357-3844 5.0 ★ ★ ★ ★ ★ 102 Verified Reviews	Oil and filter changed Steering/suspension lubricated Fluids checked Tire condition and pressure checked
03/04/2019	28,334	Auto Auction Pennsylvania	Vehicle sold at auction
 <div style="border: 1px solid black; padding: 2px; display: inline-block;"> Millions of used vehicles are bought and sold at auction every year. </div>			
04/04/2019	28,513	Dealer Inventory	Vehicle offered for sale
04/13/2019		Honda Certified Dealer Derwood, MD	Offered for sale as a Honda Certified Pre-Owned Vehicle Alabaster Silver Metallic exterior Black interior

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

CARFAX Glossary View Full Glossary

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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