

1955 Ford Fairlane Crown Victoria Custom

Date: Friday, June 3, 2022

From: [Buyer]
[Address]
[City], California [Zip+4]

[Phone] [Email]

Reference: https://C8DENCE.com/

To: Volo Auto Sales

Attn: Brian Grams, Museum Director

27582 Volo Village Road Volo, Illinois 60073-9613

1-815-385-3644

[Email]

VAS Reference: V19665

CC: Office of the Attorney General

State of Illinois

Consumer Protection Division

Attn: Virginia Luevano, Citizen's Advocate

[Phone] [Email]

OAG Reference: 2022-CONSC-00146031

RE: 1955 Ford Fairlane Crown Victoria Custom





Table of Contents

1955 Ford Fairlane Crown Victoria Custom	1
Table of Contents	2
Reply from [Buyer] to Mr. Brian Grams	4
Reply from [Buyer] to Response from Mr. Brian Grams	5
Friday, May 20, 2022, 11:11 Brian Grams, Museum Director	
Define Age	
Define Restoration	5
Video Highlights	6
From the Written Description	6
Previous Owner – "Purchase the Car Back"	7
Saturday, August 21, 2021, 08:44 [Original Owner]	7
Wednesday, September 1, 2021, 08:36 [Original Owner]	7
Monday, June 21, 2021, 08:53 [Buyer]	7
Monday, June 21, 2021, 09:38 Erik Haugaard, VAS Representative	7
Grossly Exaggerated Appraisal	8
Mechanical Condition and Maintenance	9
Physical Appearance	12
True Mechanical Condition	15
Online Image Gallery	20
Restoration Work Absolutely Necessary	21
Reputation and Authority	22
Vehicle Inspection	22
From Volo Auto Sales Website – Third-Party Inspection	22
Volo Auto Sales Media	23
Thursday, June 17, 2021, 08:04 [Buyer]	23
Thursday, June 17, 2021, 08:13 Erik Haugaard, VAS Representative	23
Odometer Reading	23
Monday, June 21, 2021, 08:53 [Buyer]	23
Monday, June 21, 2021, 09:38 Erik Haugaard, VAS Representative	23
Due Diligence	24
VAS Offer to Buy Back	24
What Am I Expecting?	25



Email Communications Timeline	26
Wednesday, July 28, 2021, 06:53 [Buyer]	26
Wednesday, July 28, 2021, 07:24 Erik Haugaard, VAS Representative	27
Wednesday, July 28, 2021, 07:35 [Buyer]	27
Thursday, July 29, 2021, 09:23 [Buyer]	28
Thursday, August 5, 2021, 11:42 [Buyer]	29
Tuesday, August 10, 2021, 02:45 [Buyer]	31
Friday, August 27, 2021, 08:03 [Buyer]	33
Tuesday, August 31, 2021, 17:11 [Buyer]	34
Wednesday, September 1, 2021, 07:26 Jay Grams, Buyer/Co-Owner, VAS	35
Wednesday, September 1, 2021, 08:38 [Buyer]	35
Thursday, September 16, 2021, 09:27 [Buyer]	37
Thursday, September 16, 2021, 12:10 Jay Grams, Buyer/Co-Owner, VAS	37
Thursday, September 16, 2021, 13:03 [Buyer]	38
Saturday, February 26, 2022, 05:59 [Buyer]	39
Wednesday, March 16, 2022, 07:02 [Buyer]	
Thursday, March 31, 2022, 02:28 [Buyer]	40
Thursday, March 31, 2022, 06:15 Jay Grams, Buyer/Co-Owner, VAS	41
Friday, May 20, 2022, 11:11 Brian Grams, Museum Director, VAS	41
C8DENCE – Expenses – Cambra Speed Shop	42



Reply from [Buyer] to Mr. Brian Grams

Good day Mr. Brian Grams. Thank you for your brief response. I'm going to preface my response with an amended repeat of what was presented in my initial complaint filed with the Illinois Attorney General Consumer Fraud Bureau on Tuesday, March 15, 2022.

This is the first time you and I have communicated, and I am assuming you are fully versed on everything that has transpired since the vehicle was received by me in California on Thursday, July 22, 2021. This would include <u>ALL email communications</u> and images (100+) received by Volo Auto Sales from me during the period July 2021 and August 2021.

Note: All times are Pacific Time. All quotes and/or statements from Volo Auto Sales are in italicized blue text. Some items have been **bolded** for my emphasis.

On Monday, June 28, 2021, I purchased a 1955 Ford Fairlane Crown Victoria Custom online from Volo Auto Sales (VAS) in Volo, Illinois. The purchase price was \$74,998 plus Illinois Sales Tax at \$4,687 for a total of \$79,685.

I purchased the vehicle based on the company's reputation (60+ years), the media presented e.g., video, images, written description, and multiple communications with Erik Haugaard (VAS Salesperson) via phone and email. I signed an AS-IS Statement based on the above.

This information presented to the consumer on the <u>VAS website</u> also assured me that the vehicle was in excellent condition, and it had undergone a rigorous (extremely thorough, exhaustive, or accurate) inspection.

"At Volo Museum Auto Sales, we love classic cars. We love them so much that we built a museum for them. Unlike other dealerships, we care about the history of the cars we purchase and ensure that we only sell vehicles that have undergone rigorous inspections."

This vehicle was advertised by Jay Grams of Volo Auto Sales as...

"This is an incredible car. Finished 15 years ago and driven 3,500 miles. It still shows and functions incredibly well. I personally drove it home and was impressed. It is ready to be enjoyed – show and go!"

"I, Jay Grams, take pride in personally writing the descriptions for virtually every car for about the last 30 years now. A significant amount of effort goes into fact checking. What I am offering is my professional impression of the vehicle."

The written description, pictures, and video provided by Volo Auto Sales depicted a beautiful car with an appraisal performed by Jay Grams (VAS) who appraised the vehicle at \$80,000 and rated it 98 out of 100.

I felt confident that I was in good hands and that I was making a responsible and safe purchase decision. Little did I know what was in store for me!



Reply from [Buyer] to Response from Mr. Brian Grams

Note: All times are Pacific Time. All links are colored orange and go to https://C8DENCE.com/ unless otherwise specified e.g. YouTube video links.

Friday, May 20, 2022, 11:11

Brian Grams, Museum Director

"We have communicated with [Buyer] via email and have already given him our perspective. [Buyer] purchased a 67 year old used car that had undergone a restoration 15 years prior to his purchase."

Define Age

Let's define Age in this instance. Yes, according to the VIN, this is a 1955 Ford Fairlane Crown Victoria. But the only components of the vehicle that are 67 years old are the exterior e.g. body and trim. All of the body panels and trim were restored to show car quality during the period 2000-2004. I've obtained the receipts for ALL 2000-2004 restoration costs from [Original Owner], the original owner/builder of the vehicle.

"None of his complaints are untypical of a 67 year old car with a 15 year old restoration."

Define Restoration

Let's define Restoration in this instance. If this were a "restoration" of 67-year-old components e.g. frame, suspension, engine, then I agree that my complaints may be untypical depending on the condition of the vehicle. But ALL of the components underneath this vehicle including the engine and drivetrain are custom and were new in 2000-2004. Nothing remains of the original 1955 Ford Fairlane Crown Victoria other than the body panels and those have been highly modified/customized. This car is a custom blend of various 1955, 1956, 1957, and 1959 Ford components.

This vehicle was advertised with only 3,549 miles since the build. According to Jay Grams, during the <u>YouTube video presentation</u> of the vehicle, he makes the below statements which I assumed to be true based on the media (video, images) and lengthy description presented.

Note: After each statement by Jay Grams, I've provided a link to a hi-res image showing the condition of the vehicle received.

These hi-res images allow you to view the damage in detail. You can view ALL of these hi-res images in the C8DENCE Image Gallery online.

I've also listed the notable inaccuracies advertised in the written description.



Video Highlights

<u>00:44</u> – "It's a beautiful car and it drives. I drove this car the other day, took it home, drove it around it is, it's spot on, excellent car."

Buyer Images: 2021-08-31 – <u>Header Damage</u>, <u>Exhaust Leaks</u>

<u>03:27</u> – "You look up at the motor it's clean, it has a high torque starter, it's all Ford driveline."

Buyer Image: 2021-07-22 – <u>Crossmember Comparison</u>

• Buyer Image: 2021-08-12 – Engine/Rear Main Seal Leak

• Buyer Image: 2021-08-31 – Broken Motor Mounts

<u>03:44</u> – "Completely custom new Ford nine inch rear end with... the specs are on our website."

Buyer Image: 2021-07-22 – <u>Third Member Comparison</u>

• Buyer Image: 2021-08-12 – Third Member Damage

• Buyer Image: 2021-08-31 – Clutch/Flywheel Damage

Buyer Image: 2021-12-02 – Rear End Disassembly

<u>06:12</u> – "This car was restored in 2005 so it's got about 15 years and it has about 3,500 miles on it so it's still an outstanding beautiful show car but now it's time to get in and drive it and enjoy it."

<u>09:19</u> – "So this is the real deal folks. This is a high quality, very tastefully done, very dialed in, ready for show and go."

From the Written Description

- It has a smooth fabricated firewall; the bay is painted as nice as the car.
 Buyer Image: 2021-08-31 Engine Bay Paint Peeling
- The roller cam and the Doug's headers send some beautiful notes to the exhaust. Fact: It is a Ford Racing Flat Tappet Camshaft. This is a significant difference in camshaft types.
- It has 3x4 boxed frame with tubular front control arms and Morrison 2-inch drop spindle kit.

Fact: It is an Art Morrison 2x4 Boxed Frame.

- Exterior Color: Mandarin Orange
 Fact: It is PPG Mandarin Copper, it's NOT Orange.
- In back is a Hoopers Ford 9-inch rear with 3.50 gears, Moser 36 spline axles. Fact: Current axles are 31 spline, not 36 spline axles as advertised.
- Wilwood 11-inch disc brakes at all 4 wheels, custom e-brake assembly, stainless lines and polished calipers.

Fact: Wilwood front only. Ford Excursion rear. Polished calipers front only.



Previous Owner – "Purchase the Car Back"

"The statements we provided on condition are opinion based and we stand firm with our opinions. Besides our opinions, we know the owner history of this car and the previous owners all agree how incredible it is, as a matter of fact one of the previous owners offered to purchase the car back. The car has won numerous top awards and has been featured in magazines."

I would assume you are referring to [Original Owner] who indicated to me that he was in communications with Volo Auto Sales about a potential purchase of the vehicle. He too was impressed by the VAS media that was presented and "observed" the same thing I did, a beautiful vehicle that only had 3,549 miles on it since the build.

[Original Owner] and I have communicated many times after I purchased the vehicle. He's seen the 100+ pictures of what I received and here are just a couple of his comments.

Saturday, August 21, 2021, 08:44 [Original Owner]

"Jeez, what a mess!!! No wonder you are so upset."

Wednesday, September 1, 2021, 08:36

[Original Owner]

"What the hell did the previous owners do to my [your] car? Any way of finding out who the previous owners were? Any help that I can give you please call me. This breaks my heart."

I'm sure [Original Owner] would not be happy that you would use him as a reference regarding how incredible the vehicle is. Yes, this vehicle was once incredible and I'm doing everything I can to bring it back to some semblance of its original glory.

"...we know the owner history of this car and the previous owners all agree how incredible it is."

According to Erik Haugaard, VAS Representative, the history of the vehicle owners was unknown to Volo Auto Sales when I inquired.

Monday, June 21, 2021, 08:53 [Buyer]

"I was able to find one previous transaction for the car, that was in September 2011. At the time, she had 2,593 miles. Will the documents I'm receiving show the complete history for the car? I'd like to know all the previous owners and history if possible."

Monday, June 21, 2021, 09:38

Erik Haugaard, VAS Representative

"We do not have owner(s) history."



Grossly Exaggerated Appraisal

This vehicle was rated a 98/100 in an Appraisal performed by Jay Grams on Monday, July 5, 2021. All but two of the items were rated as a 5 (Excellent), and Authenticity was rated as a 4 (Very Good).

I've broken down this Appraisal Form on the following pages and have provided commentary and images. This Appraisal by Jay Grams was *grossly exaggerated*.

/ehicle ID No.			Appraisal Da	te			
U5GW152218			07/05/2	2021			
Year Make 1955 Ford	Model	n Victoria		Body Style Hardtop	1 6		
Mileage Shown	Clowi	Owner Edward		Tiardtop		10 hans	
Street Address City			Sta		Zip C	ode	
				Poor Fair	Good	Very Good	1 Excelle
Mechanical Condition and Maintenance			0	1 2	3	4	5
A. Engine, Start and Idle			\cdot	님 님	닏	님	
B. Windshield Wipers	* * * *	$\epsilon \ \epsilon \ \epsilon \ \epsilon \ \times \times$	- 님	님 님	님	님	
C. Exhaust System			$\cdot \vdash \cdot$	님 님	님	님	
D. Brakes (pedal and hand)			·	H	님	님	
E. Lights		* * * * * * *	·남 !	님 님	님	H	
F. Horn			·	H	님	H	
G. Tires			·H ;	H	님	H	
H. Glass and/or Side Curtains			· H	H	H	H	
Wiring (neat and safe)			H	H H	H	H	
K. Authenticity			· H	H H	Ħ		Ħ
Physical Appearance		Ur	nsatisfactory	Poor Fair	Good 3	Very Good	d Exceller
A. Engine Room			$\dot{\Box}$	$\dot{\Box}$	$\vec{\Box}$		Ů
B. Undercarriage			· H	H H	Ħ	Ħ	
C. Body (condition of)							V
D. Roof or Top (if all metal, DO NOT SCORE)							V
E. Plating			. 🗆				~
F. Paint			. 🔲				~
G. Upholstery (headliners, floor coverings)			. 🔲 📗				/
H. Instruments, Dash, Interior Trim			. 🗆 🖠				~
. Degree of Authenticity of Restoration			. 🗌			~	
Officially Appraised By:		Appraisal Value	7 7 1	Total Sc	ore		
JAY GRAMS	Owner:	s 80,000	By:	98			
Vehicle Appraisal is based on description and photos supplied by	Owner:	Vehicle Inspected	Зү:				



Mechanical Condition and Maintenance

Α.	Гисти	Ctout	مالما لمور	,	=
Α.	Ename.	Start	and idle		Э.

When the vehicle was first received in California on Thursday, July 22, 2021, it started and idled okay. When we opened the hood, we discovered visible fluid leaks on the top end of the engine e.g. all manifold bolts.





B. Windshield Wipers5

The vehicle initially had no Windshield Wipers. I inquired about this during the sales process, and they were added prior to shipping.

C. Exhaust System...... 5





After the initial test drive of 10 miles, an exhaust leak became apparent at which time the vehicle was returned to Crevier Classic Cars for further inspection. At that point, start and idle were very rough, the car sounded like a steam engine with the exhaust leaks. The vehicle had not undergone an inspection yet, this was my first and only test drive as soon as the vehicle came off the auto transport.

It was later discovered, during the Cambra Speed Shop inspection, that there were multiple points where exhaust was leaking e.g. hole in header pipe, header connections. Three of the header bolts were stripped. It was a mess.



D.	Brakes (Pedal and Hand)	. 5
	The vehicle was advertised as having "Wilwood 11-inch disc brakes at all 4 wheels, custom e-brake assembly, stainless lines and polished calipers."	
	Fact: Wilwood front only. Ford Excursion rear. Polished calipers front only.	
	All brakes needed to be redone/repaired e.g. rotors turned (grooves), pads replaced (damaged), calipers cleaned.	
E.	Lights	5
	I'm not aware of any issues as of Friday, June 3, 2022.	
F.	Horn	5
	I'm not aware of any issues as of Friday, June 3, 2022.	
G.	Tires	5

The tires on the vehicle had a 2002 (30th Week) date code, they were the original tires from the 2000-2004 build and were well beyond their life expectancy. Due to the low mileage of the vehicle, the tires looked new. Upon close inspection, you can see the dry rot. I was expecting to have to replace just the tires after email discussions with Erik Haugaard from VAS. I wasn't expecting to have to replace all four (4) wheels too.





The wheels shown in the VAS Advertisement were black. The wheels I received were painted red and the paint job is unsatisfactory, it's embarrassing. These wheels and tires were rated a 5 in the appraisal by Jay Grams. **Seriously?**

The rating of 5 (Excellent) for the tires seems grossly exaggerated based on the true condition of the wheels and tires received

	true condition of the wheels and thes received.	
Н.	Glass and/or Side Curtains	5
	I'm not aware of any issues as of Friday, June 3, 2022.	
l.	Wiring (Neat and Safe)	5
	The wiring is due to be inspected in mid-June 2022. There is an issue with a battery drain and this was claimed to have been corrected by Volo Auto Sales before shipping. That doesn't appear to be the case, a new battery installed by VAS was dead within a week of sitting.	
J.	Cooling System (Top Tank, Core, Hoses)	5

We had to replace all of the hoses; they were beyond their shelf life.



K. Authenticity......4

I'm not aware of any issues as of Friday, June 3, 2022.



Physical Appearance

Δ	Engine Room	E
\neg	FIIGILIE LOOIII	

The engine bay looked nice from a distance but on close inspection, it was filthy. In addition to the filth, there was paint peeling. The engine and transmission were removed for repairs. During this time, the engine bay was cleaned, and the area where paint was peeling was repainted, not the entire engine bay.



B. Undercarriage 5

By definition, this would be the supporting frame under the body of the vehicle minus all suspension components. It is a custom Art Morrison 2x4 Boxed Frame. It was advertised by VAS as being a 3x4 Boxed Frame.

There is paint damage on various areas of the frame, some of this has been repaired/repainted e.g. areas of high visibility (crossmember). That damage was not present (visible) in the images used in the VAS advertisement.



The passenger side door has a .125 gap when closed that has not been inspected yet. During an email communication with Erik Haugaard from VAS, I
had asked about that .125 gap and whether or not the door was shut all the way He confirmed that the door was not closed all the way.

Buyer: "Question, at 1:06 into the video you are panning down the right side. I noticed that the door alignment is off or is the door not shut all the way?"

Erik Haugaard: "Not closed all the way."

D.	Roof or Top (if all metal, DO NOT SCORE)	. 5
	I'm not aware of any issues as of Friday, June 3, 2022. This is an all metal top.	
E.	Plating	. 5
	I'm not aware of any issues as of Friday, June 3, 2022.	
F.	Paint	. 5

While the exterior paint job looks nice at a distance, upon close inspection there is noticeable damage in some areas e.g. chips, scratches, gouges, etc. I am assuming this occurred after the images used for the advertisement were taken in October 2020.

Note: The vehicle was sold in November 2020 and was returned in May 2021.

Since the wheels were painted red by the previous owner (Circa Nov 2020 to May 2021), the skirts would have had to been removed. During that removal, there are multiple areas where the paint was scratched and gouged.





G.	Upholstery (Headliners, Floor Coverings)	5
	I'm not aware of any issues as of Friday, June 3, 2022.	
Н.	Instruments, Dash, Interior Trim	5
	I'm not aware of any issues as of Friday, June 3, 2022.	
l.	Degree of Authenticity of Restoration	4
	I'm not aware of any issues as of Friday, June 3, 2022.	



True Mechanical Condition

Let's discuss ALL of the other issues that VAS *failed to disclose during the sales process AND the final inspection* performed by VAS prior to shipping the vehicle to California in July 2021. I'm going to start off with a select group of images that are linked to their hi-res versions for closeup viewing. I will then follow with my commentary. According to Mr. Brian Grams, this is what the consumer should expect when paying \$75,000 for a 67-year-old custom built vehicle.



▲ Oil Leaking from Around Manifold Bolts



▲ Header Damage – Exhaust Leaks







▲ Fluid Leaking from Rack and Pinion





▲ Fluid Leaking from Third Member (Rear End)





▲ ALL Coil Over Suspension Spacers and Bushings Damaged

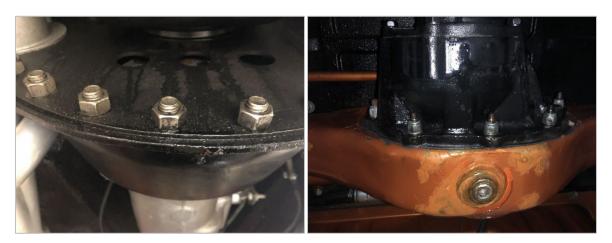




▲ Frame Damage NOT Shown or Seen in VAS Images



▲ Comparison Images – Advertised vs What Was Received



▲ Rear Engine Seal Fluid Leak – Third Member (Rear End) Fluid Leak

C8DENCE





▲ Flywheel and Clutch Damage





▲ Broken Motor Mounts





▲ All Fuel Lines Gummed

C8DENCE





▲ Fuel Pump Leaking – Control Arm Bushing Damage





▲ All Control Arm Spacers and Bushings Damaged





▲ Disassembled Rear End – Claimed New in Video





▲ Disassembled Rear End Axles

Online Image Gallery

The above are ONLY a select group of images being utilized for this document. You can view ALL images with descriptions in a gallery format (hi-res) online at C8DENCE.com.

- Gallery Home
- <u>Exterior</u>
- <u>Interior</u>
- Engine
- Undercarriage
- Restoration



Restoration Work Absolutely Necessary

"The restoration work [Buyer] is performing is not out of necessity nor does it offer safety issues."

It is absolutely out of necessity and is paramount to the safety of my passengers and myself. This vehicle was a death trap. Many critical components were damaged, and some were about to give way to more damage had this vehicle been driven for any period of time.

Wheel bearings, suspension components, clutch, etc. were all on the cusp of fatal failure. Some items had already failed e.g. both engine mounts broken, transmission mounts broken, suspension hardware damaged (spacers, bushings), etc. And your opinion is that none of these are necessary and offer no safety issues?

"He would like to raise the overall caliber of the car to the condition it was 15 years prior when the car was first restored."

If that were the case, I would be replacing all of the components and that is not what we are doing nor was that what I was expecting we'd have to do. We've repaired/restored most of the items in question. During those repairs, there were new materials required e.g. seals, bushings, hardware, paint, etc. Some items had to be fabricated as they are no longer available e.g. hardware for front and rear Art Morrison Control Arms.

"The cost to bring the car to that condition at that time was \$250,000. Our sales price was \$74,998. We were not offering a \$250k car for \$75k."

The vehicle I received was NOT what VAS advertised and what I was expecting for my \$74,998. This vehicle was priced well above (\$30,000+) most other 1955 Ford Fairlane Crown Victoria models, it's a true "one of a kind."

Based on the VAS media, images, sales description, etc., I was expecting to receive a pristine vehicle in excellent running condition, one that was ready for "Show and Go" as stated by Jay Grams in the video and the written description. I received the exact opposite. VAS falsely advertised this vehicle. I stand by that statement, and the images presented along with my commentary will prove that.

"So this is the real deal folks. This is a high quality, very tastefully done, very dialed in, ready for show and go."

Jay Grams - Video Advertisement: 09:19



Reputation and Authority

"We are a collector car dealer with an excellent reputation and are regarded as an authority in the industry."

The above is a matter of opinion. If you're going to use your Yelp Ratings for reputation, then yes, you're doing well. But it's misleading as a MAJORITY of the reviews are for the museum portion of the business, NOT the auto sales. You have to dig through the reviews that are not shown to find the negative reviews regarding auto sales. This is not the first time a consumer has been misled by the online media and description provided by Volo Auto Sales.

Vehicle Inspection

"[Buyer] declined to inspect the car personally however he did speak to the person who did the restoration work."

That is incorrect. I did not speak to the person [Original Owner] who did the restoration work until a month after the vehicle's arrival here in California.

Your response indicates to me how this discussion is going to proceed. You are either not informed and/or will be providing misinformation in your future responses – that's NOT going to bode well.

Yes, I declined to inspect the car because of the media presented in the online sales advertisement. The VAS description, images, and video depicted one vehicle, my images of what was received depict a vehicle with a host of issues that don't appear in the images you utilized in your advertisement nor were they disclosed during the sales process, or the final inspection by Volo Auto Sales. There are also multiple inaccuracies in your description of the vehicle.

From Volo Auto Sales Website – Third-Party Inspection

"Though a third-party inspector can be a valuable resource, they are not totally unbiased. They may not be biased towards the sale, but they will have some bias in their report. To protect themselves, they will often be overcritical when compared to other car experts, as they don't want a customer to accuse them of misleading them. Because of this, they will often overstate a car's negatives.

While they are a good resource, a buyer should take their inspection reports with a grain of salt."



Volo Auto Sales Media

Let's discuss the VAS media. The video was posted to <u>YouTube on November 3, 2020</u>. The images posted by VAS were taken on Thursday, October 15, 2020, according to EXIF data. The <u>VAS</u> advertisement was posted sometime between those dates.

According to Erik Haugaard from VAS, the vehicle sold in November 2020 to a local collector. I found this out during the sales process.

Thursday, June 17, 2021, 08:04 [Buyer]

"Good day Erik. I see that Victoria was previously sold within the past 8 months. It came back to ya? What happened?"

Thursday, June 17, 2021, 08:13

Erik Haugaard, VAS Representative

"The car went to a customer of ours that buys and trades regularly."

The vehicle was sold to the local collector (Title: D**** W****** S******), a Volo Auto Sales regular customer, in November 2020. It appears to have been returned in May/June 2021 and was up for sale again, that is when I purchased.

Odometer Reading

One of the images used in the October/November 2020 advertisement for the car was of the odometer showing 3,549.8 miles. That same image was used for the June 2021 advertisement and the mileage of 3,549.8 was confirmed via email to be accurate by Mr. Erik Haugaard from VAS.

Monday, June 21, 2021, 08:53 [Buyer]

"The images on Volo show that there are 3,549 miles, is that accurate or were there additional miles since this photo was taken? I wasn't exactly sure how recent everything was regarding images and video. I recall you mentioning that it was initially listed about 7-8 months ago and purchased by a local collector who had it for a few months?"

Monday, June 21, 2021, 09:38

Erik Haugaard, VAS Representative

"The miles shown are accurate."



Due Diligence

"All of our cars are sold as-is and it is up to the buyer to do their due diligence prior to purchase, not after."

There is only so much due diligence one can perform when they are at a distance geographically and making a purchase online. I'm also in a risk category for COVID. The buyer, [Buyer], is relying on the seller, Volo Auto Sales, to be truthful in their advertising and provide full disclosure. Especially a "collector car dealer with an excellent reputation and are regarded as an authority in the industry."

"We make this very clear on our bill of sale and documents, all of which were signed by [Buyer] including an acknowledgement that he rejected his option to inspect the car. Copies are attached."

It's a shame I couldn't have had you sign a document stating that your advertising and media were truthful. This vehicle was *grossly misrepresented* in the sales media.

VAS Offer to Buy Back

"Furthermore when [Buyer] contacted us about his disappointment of the car we offered to buy it back at the full purchase price because we knew it was a very nice car and very fairly priced and we would not have an issue reselling it at that price if not more."

My first email contact regarding the condition of the vehicle was on <u>Wednesday</u>, <u>July 28, 2021</u>, <u>at 06:53</u>. The vehicle arrived on Thursday, July 22, 2021, via enclosed carrier, at 13:05. During this time, the vehicle was awaiting inspection at Crevier Classic Cars in Costa Mesa, California.

<u>I sent seven emails</u> with 100+ images to Volo Auto Sales during the month of July and August 2021 indicating the issues we were discovering on a weekly basis.

I received one reply to the first six emails I sent during that time from Erik Haugaard, he disagreed with my assessment of the vehicle, that was after my first email on Wednesday, July 28, 2021, the other five emails were ignored.

The offer to buy back the vehicle was made after I had already made a considerable investment in preparation for repairs. The engine and drivetrain had been removed, the undercarriage was being disassembled e.g. suspension, brakes, rear end, etc. There were additional preparation costs incurred that I would not have been able to recover. It was not feasible to accept the offer.

There were no other replies to my five additional emails during the month of August 2021 until Wednesday, September 1, 2021. During this time, the vehicle was being disassembled for repairs. The list of issues present was/is numerous. Please refer to the <u>Table of Expenses</u> at the end of this document.



What Am I Expecting?

While "some of the items" in the <u>C8DENCE Expenses</u> table would not be the responsibility of Volo Auto Sales, "most of them" would be. I wasn't expecting 95% of what we have had to do.

During the after-sale phase, which was stressful to say the least, I was informed by Ryan Grams (VAS) that it appeared new gaskets and seals were present on the top end. I assumed that I'd maybe have to put \$7,500 into minor repairs and upgrades upon arrival e.g., new tires, cleaning/rebuilding of dual quads, fluid changes, tuning for West Coast climate, and a complete detail from top to bottom.

Little did I know that this would turn into a \$50,000+ expenditure on top of the \$75,000 sale price. As of Thursday, June 2, 2022, I am \$42,214 into repairs and restoration. I have a current total investment in the vehicle of \$132,090 and expect that to exceed \$145,000 as we come to completion of repairs. I've had to cash in me retirement stocks to cover the additional expenses.



Email Communications Timeline

Note: Emails are in chronological order with the first email on Wednesday, July 28, 2021, at 06:53 Pacific Time to Volo Auto Sales concerning the condition of the vehicle.

Wednesday, July 28, 2021, 06:53 [Buyer]

"Good day Eric, Ryan. Can you confirm with me when the photos of the Crown Victoria that were displayed on the website were taken? It's unfortunate, but when Jay says "She's ready to show and go..." in the video, that was far from the truth.

I've been able to drive her once when she got here (07/22/2021) for about 10 miles. Discovered a HOST of issues that I was not expecting. Come to find out there are quite a few repairs that need to be done e.g. exhaust leak, manifold leaks, brakes, carbs, etc.

And then Jay says in the video that the underside looks as nice as the top side. Unfortunately, that is not true either. This car was beat up a bit by a previous owner and not taken care of.

First thing I need to find out is how much time elapsed from the time those images were taken on the website and the time I purchased. I'm going to assume that is the timeframe that the car was purchased by someone locally and then came back to you?

She's already been through one inspection here. They had to stop as the repairs were going to be outside their scope. I'm scheduled for another inspection with a well-known hot rod shop tomorrow morning. We will be photographing and documenting everything. I've been invited to write about my experience for a local magazine who happened to be present when she was coming off the transport. They fell in love with the car, just like I did. And then we started going over the finer details.

Ryan, when you did your inspection, did you see the oil pooling on the manifold? Did you also notice that the right door does not shut all the way, there's about a .125 gap? I had asked Erik about that during a video walkaround, and he stated that the door was not shut all the way.

Yes, I know, I signed an AS-IS statement. But I surely wasn't expecting to receive something different than what was pictured in the photos. This was definitely a learning lesson for me! NOT having any specifications for the engine has also been a challenge.

Note: Whomever purchased it previously trashed the wheels. WTH? Fortunately, I'll be replacing the wheels and tires, so it is a moot point. But I surely would not have gone to any shows with that crap. Ya, that was a crap paint job they did on the outer edges of the wheels – CRAP!"



I did receive a reply to the above email from Erik Haugaard of VAS.

Wednesday, July 28, 2021, 07:24

Erik Haugaard, VAS Representative

"I'm sorry you are not happy with your purchase of the Crown Victoria. I disagree with your assessment of the vehicle. You purchased a customized classic car which comes with the understanding and I'm sure you agree while doing your research prior to buying the Crown Victoria it isn't the same as looking after a brand new car. Older cars need quite a bit of care that isn't required with new vehicles."

Wednesday, July 28, 2021, 07:35 [Buyer]

"Please confirm the date the pictures and video were taken on the Volo website, thank you.

"You purchased a customized classic car which comes with the understanding and I'm sure you agree while doing your research prior to buying the Crown Victoria it isn't the same as looking after a brand new car."

I fully understand my responsibilities in this transaction. As I've stated, I learned my lesson.

"Older cars need guite a bit of care that isn't required with new vehicles."

The only thing old about the car is the body. The frame and everything else is custom. The pictures depicted one state, but after receiving the car, it was in another state.

Yes, I know, I signed an AS-IS statement and relied on Volo's history and expertise in this area. I relied on what was being said in the video and shown in the photographs. I learned that you CANNOT do that, no matter how reputable the company claims to be. I've accepted the fact that I now own the car and it is my responsibility to fix EVERYTHING that may be wrong with it. It definitely is NOT in "Show and go" condition as Jay stated in the video. It's not even drivable. The exhaust leak is pretty bad. I'm told there is an actual bolt missing from the header and it appears to have been missing for some time.

I just want to make sure that I have all my facts straight for when I write my article. I surely don't want to state anything that is not true, especially since this will go to print.

Thank you for your assistance."



Thursday, July 29, 2021, 09:23 [Buyer]

"Good day Erik. I'll await you reply regarding when the video and pictures were taken. Based on research to date, it appears they were taken in Oct 2020. The car sold to someone between then and the time I purchased in Jun 2021. During that time, it appears that quite a bit of cosmetic damage occurred. But, after reviewing the images closely, it appears that Volo may have used Photoshop (or similar program) to cover up any imperfections or visible damage. Is that a common practice in your industry?"









Thursday, August 5, 2021, 11:42 [Buyer]

"Good day Erik. Since no one has responded to this email regarding the date of the pictures and videos, we'll assume they were taken in October/November 2020.

I am including others in this email communication who should be aware of what I am now going through regarding a vehicle that was advertised as "Ready to show and go." That was far from the truth.

Victoria arrived in Costa Mesa, California on Thursday, July 22, 2021, at 13:00.

We took a video of the vehicle being removed from the automotive transport. During that time, you could hear a slight exhaust leak.

I was able to drive the vehicle for 10 miles and had to return, the exhaust leak got worse, to the point where it was filling the interior with exhaust gasses, I had the windows down so I could listen to what was happening during the test drive.

Based on how the car was advertised along with the images presented, I made the "assumption" that she was ready to "Show and Go" as Jay Grams states in the video. I made the grave mistake that many probably make in this process and that is not having my own inspection performed. I trusted what I was hearing and seeing in the videos and images posted in the sale advertisement. I trusted what I was reading on the Volo website regarding reputation and years in business.

It appears that the video and images were taken in October/November 2020. It was stated by Erik that the car sold between that time and June 2021 to a local collector who returned it. That should have been a red flag for me in the buying process.

We've reviewed ALL of the images posted for this vehicle and have examined them closely, this includes the RK Motors and Volo Auto Sales images along with photographs provided from the original build album. One of two things happened here; the local collector who purchased the car abused it. Or the images were Photoshopped to hide much of the scarring and paint damage to the undercarriage. Not to mention other damage that is present e.g. bushings, seals, etc. There is also fresh paint damage around the skirts, we'll assume this happened when the local collector who purchased TRASHED the wheels with the paint job.

I purchased this vehicle on Monday, June 28, 2021 – paid in full. It has been thirty-eight (38) days and I've not been able to enjoy my investment. It's going to be at least another thirty (30) days before I'm able to take her for a cruise. She will be in the shop for at least 3-4 weeks undergoing a full documentation and repair of all components that are damaged or need replacing. We will be photographing ALL of the issues that are present which are many. Issues that SHOULD have been discovered during your inspection. Yes, I fully understand the AS-IS Statement but, I also fully understand a bit of truth in advertising.



She was supposed to go in the shop for an initial inspection on Tuesday, August 3, 2021, at 10:00. I go to pick up the car from storage and my contact tells me that the last time she ran, it didn't sound too good. We go to start the car and the battery is dead. This is supposed to be a new battery, Ryan sent me a receipt for it. It failed in just one week of sitting. Apparently, all that electrical work that was claimed to have been done did not fix the issue of the battery being drained.

Volo sold me a vehicle that was not what was advertised. I'm sure when Jay drove this vehicle back in October 2020, she was ready for some show and go. But, between then and the time I purchased, she was abused and is far from a "Show and Go" state.

Regarding the exhaust leak. I'll know more about this on Monday, August 9, 2021, as that is when she goes in for surgery. But, upon initial inspection, the leak has been present for some time. The header is damaged in that area where the leak is. The ceramic coating has blistered, and it almost looks like there is surface rust. I've included pictures showing the bolt(s) missing from the third pipe. When we started this on Tuesday, it sounded like a steam engine. We're hoping it's just a matter of the bolt(s) missing and not a matter of them being sheared off.

Once all of this has been done, Victoria will have her own website where we will be sharing our story about this entire process. It was far from what we expected, and we want to make sure others don't make the same mistake we did. We'll be sure to send you a link once the site is launched.

Yes, I fully understand the AS-IS Statement as I know that will be used to justify my predicament."









Tuesday, August 10, 2021, 02:45 [Buyer]

"It is Tue, Aug 10, 2021, and the time is now 02:00 Pacific Time. Victoria went into the shop on Mon, Aug 9, 2021, at 09:30, I was there for four (4) hours going through the inspection with a team of others. We had to have a flatbed deliver her to the shop, the car is not drivable, and it is NOWHERE near "Show and Go" as Jay Grams states in the video and in writing.

"This is an incredible car. Finished 15 years ago and driven 3,500 miles. It still shows and functions incredibly well. I personally drove it home and was impressed. It is ready to be enjoyed-show and go!"

It is far from ready to be enjoyed. Once the car was up on the rack, it became apparent how much damage there is to various components. I am currently waiting for the list of items that need to be replaced and/or repaired, they are numerous. Almost every single gasket, seal, and piece of rubber needs replacing. We have fluid leaks from the engine, transmission, rear end, rack and pinion, etc.

The engine needs to be pulled to fix the exhaust leak along with the fluid leaks from multiple points. We did find out that the exhaust leak was caused by missing bolts on the headers. They've been missing for some time based on the amount of exhaust gas damage that has occurred around where the bolts are missing - they are stripped! It also appears that someone attempted to use "silicone" to fill the holes and something to seal the leak (a band-aid to hide the leak?). I'll know more once the engine is pulled and a closer inspection is done.

Ryan claims that the car was sent out for electrical repairs. Unfortunately, whatever repairs were done did not fix the issue with the battery draw – it's dead. The shop will need to go through the electrical to determine what is killing the battery.

I'm going to respectfully request that Volo Auto Sales refund monies to cover the cost of repairs that were unexpected. Yes, I know, I signed the AS-IS Statement, and it is now my responsibility. And, if that's the position that Volo Auto Sales is going to take, I'm okay with that. What you folks do about this will determine what I do about it.

Don't expect to see me leaving a review on Yelp and/or Google. No, I do things a little differently when I'm wronged. My entire experience will be fully documented with dates, times, images and videos. That documentation will occur on Victoria's new website at https://C8DENCE.com/. It's just a logo at this time, I am preparing the timeline of events and am waiting for the list of items that need repairing along with the cost. So far, it is north of \$10,000.



I'm looking at the Volo Auto Museum Appraisal Form where Jay Grams awards a score of 98 overall. SERIOUSLY JAY? Did you drive this car before it was shipped to me? I don't think you did. Most of the items marked as "5 Excellent" are false.

This whole experience has literally left me physically ill. My decision to purchase this vehicle based on the misrepresentation by Volo Auto Sales has left me in a precarious situation. I can't sell the car in its current condition, not for what I paid. I am now going to pull from my 401K to fix this.

Just an FYI, this should make you feel a little better. This car was a gift from my mother who passed away in Dec 2020. I know she's looking down at me right now and is NOT happy with my decision and she's PISSED at Volo Auto Sales.

This has been one of the worse buying decisions in my adult life. I totally fell for the Volo Auto Sales pitch. What's that old saying? "There's a sucker born every minute." Ya, I definitely feel like that sucker right now.

Also, where are the "Photo Shoot" images that I paid \$200 for? You can refund that \$200 as the images are of no use to me."



Friday, August 27, 2021, 08:03 [Buyer]

"It is Fri, Aug 27, 2021, and the time is now 08:00 Pacific Time. C8DENCE (Vehicle Name) has now been in the shop for almost 3 weeks, and we still have another 2-3 weeks to go before the vehicle is drivable. The list of repairs is rather extensive and costly. I am currently seeking legal advice on what options I have as a consumer who has signed an AS-IS statement based on verbal and written statements from Volo Auto Sales personnel.

You charged me \$200 for a "Photo Shoot Package", where are the photos? Is it your plan to ignore my emails and requests and hope that I go away?

https://c8dence.com/history/sales

I will have an article published about my experience with Volo Auto Sales once all of the issues have been documented, photographed, repaired, and all unexpected "AS-IS" costs have been tallied. Emails to VAS about the issues are being ignored.

Note to Erik: I've been in regular communication with [Original Owner], the original owner of this vehicle. There is one thing you didn't lie to me about and that was that the original owner was interested in purchasing the vehicle. [Original Owner] has been viewing the images with me and he's sad that the car is in the shape that she is. This image makes me ill every time I view it, it will be one of the main images in my article."





Tuesday, August 31, 2021, 17:11 [Buyer]

"Good day Erik and to those on the CC and BCC recipient list. This is a continuation of my comments from Fri, Aug 27, 2021. I've removed the Greg@ address as that is undeliverable. I've added Joey@ as that seems to be another valid address. There are also additional BCC recipients.

Note: To conserve email size, I have removed images that were inserted into this email message. These images can be located in the attached 53 page PDF.

It is Tue, Aug 31, 2021, and the time is now 16:45 Pacific Time. I received more bad news regarding the 1955 Ford Fairlane Crown Victoria Custom that I purchased from Volo Auto Sales on Mon, Jun 28, 2021.

I've attached a PDF file that contains 53 pages of images that were taken by Crevier Classic Cars in Jul 2021 and Cambra Speed Shop in Aug 2021. We will continue to take pictures as we address each item needing repair.

Today I learned that the clutch is literally "fried". There are large pieces of paint peeling in the engine box. Every single piece of rubber under the car is damaged. Everything that has a seal is leaking and I do mean EVERYTHING.

The engine had to be pulled because the third member seal was leaking. During the removal of the engine, many other damaged items were discovered. The motor mounts are broken. "They 'look' like they are 30 years old." was one comment made during the inspection.

I asked the team that is working on the car this question...

"Based on what you've seen so far since disassembling the vehicle, would you say that this car only has 3,600 miles on it?"

The answer was an emphatic "no"! This car has many more miles than the 3,549.8 shown on the odometer. The condition of the components under the car are a clear indicator of mileage and age. I've got the owner of the shop writing a letter regarding the odometer reading. More than a few of us agree that this car has many more miles on it.

The attached images along with 100+ others will be posted to C8DENCE.com and become publicly available once this phase of repairs has been completed and fully documented.

At this point all I am asking for is a response to the issues I'm currently faced with. Why were the pictures, video, and description on the website not representative of the vehicle I received? Who attempted to plug the exhaust leak with silicone and also tried to weld a hole closed in the header pipe? Why are multiple header bolts stripped? I have so many questions along with a quickly growing list of unexpected AS-IS expenses.



Jay Grams: "This is an incredible car. Finished 15 years ago and driven 3,500 miles. It still shows and functions incredibly well. I personally drove it home and was impressed. It is ready to be enjoyed – show and go!"

Seriously Jay?"

Wednesday, September 1, 2021, 07:26

Jay Grams, Buyer/Co-Owner, VAS

"Hello [Buyer],

You obviously have a much different opinion of the condition of the Ford than we do.

Return the car and we will give you a refund for the purchase price.

Otherwise do what you need to do.

Sincerely"

Wednesday, September 1, 2021, 08:38 [Buyer]

"Good day Jay Grams. Thank you for your response.

"You obviously have a much different opinion of the condition of the Ford than we do."

It's not just me, there have been a dozen people involved with this car since its arrival on Thu, Jul 22, 2021. The photographs we've taken coincide with "our" opinions of the condition of the vehicle.

"Return the car and we will give you a refund for the purchase price."

Unfortunately, that is not a viable option at this point. The car is disassembled, the engine is out, parts have been ordered and in route and/or are in house, schedules have been planned, etc. It would have been nice to have this offer made to me before I invested what I have to date which is over \$20,000 and may potentially end up being north of \$30,000 as we continue to address each item underneath the car.

Now that we've seen the condition of some of the internals, we have concerns about other items that have not been addressed yet, e.g. transmission, rear end, engine internals.

Volo Auto Sales misrepresented the condition of this vehicle in your advertising, videos, images, etc.

"Otherwise do what you need to do."



I am currently doing what I need to do, pulling from my 401k and correcting the host of unexpected issues this vehicle has. Once we've finished with repairs and have tallied the costs, I shall be in further contact with Old Volo Inc.

Jay Grams: "This is an incredible car. Finished 15 years ago and driven 3,500 miles. It still shows and functions incredibly well. I personally drove it home and was impressed. It is ready to be enjoyed – show and go!"

#	Date	Item	Cost	Tax	Shipping	Total
1	2021-06-28	1955 Ford Fairlane Crown Victoria	\$74,998.00	\$4,687.00		\$79,685.00
2	2021-06-28	Volo Auto Sales Processing Fee	\$165.00			\$165.00
3	2021-06-28	Volo Auto Sales Appraisal Fee	\$100.00			\$100.00
4	2021-06-28	Volo Auto Sales Photo Shoot Package	\$200.00			\$200.00
5	2021-06-28	Hagerty Insurance Agency	\$1,269.00			\$1,269.00
6	2021-07-22	Enclosed Vehicle Transport	\$1,890.00			\$1,890.00
7	2021-07-26	Crevier Classic Cars Inspection and Photos	\$100.00			\$100.00
8	2021-07-30	Sheila Duggan DMV Services	\$100.00			\$100.00
9	2021-08-03	California Use/Sales Tax		\$1,207.00		\$1,207.00
10	2021-08-03	California Registration Fees	\$805.00			\$805.00
11	2021-08-09	Crevier Flatbed Trailer to Cambra Speed Shop	\$75.00			\$75.0
12	2021-08-09	Cambra Speed Shop Deposit	\$10,000.00			\$10,000.0
		Totals	\$89,702.00	\$5,984.00		\$95,596.0



Thursday, September 16, 2021, 09:27 [Buyer]

Good day Jay Grams and to all on the CC and BCC lists. This is a continuation of my comments from Wed, Sep 1, 2021.

It is Thu, Sep 16, 2021, and the time is now 09:20 Pacific Time. The bad news continues into day 80 since purchase. I won't bother you with the details any further. I would like to confirm that Jay Gram's previous response still stands?

"Otherwise do what you need to do."

I do plan on seeking legal action if we can't resolve these additional costs amongst us. One of the issues that has come to light is the odometer was tampered with between Nov 2020 and May 2021, the images in your sales materials confirm this. It was disconnected or rolled back via old school methods. I've had more than a handful of professionals looking at this vehicle and its condition. All of them have agreed that there are many more miles on this car than the 3,549.8 that were shown on the odometer and advertised by Volo Auto Sales.

The vehicle won't be ready for "show and go" (per Jay Grams) until sometime in late October. The costs are going to be north of \$30,000. I will only be seeking reimbursement for those items that were misrepresented during the sales process which is most of the costs.

Thank you in advance to your prompt response to this email. I just want to confirm if I need to hire an attorney.

https://c8dence.com/history/sales"

Thursday, September 16, 2021, 12:10

Jay Grams, Buyer/Co-Owner, VAS

"Hello [Buyer],

I do not agree with your expectations of an old car. \$30,000 is an absurd expectation.

Proceed as you feel necessary.

Sincerely"



Thursday, September 16, 2021, 13:03 [Buyer]

"Good day Jay.

"I do not agree with your expectations of an old car."

The only thing "old" about the car is the body and that was restored to show car quality and I have no major issues with the body at this point. Everything else is as of 2000-2004. Everything under the car is custom (engine/drivetrain/suspension/frame/etc.). The car was advertised with 3,500 miles since the build. It's unfortunate but the condition of this vehicle is not representative of having only 3,500 miles on a \$250,000+ build. I could understand if I were dealing with original components from the 50s era, but we are not.

"This is an incredible car. Finished 15 years ago and driven 3,500 miles. It still shows and functions incredibly well. I personally drove it home and was impressed. It is ready to be enjoyed – show and go!"

"\$30,000 is an absurd expectation."

It's not an expectation as of yet, it's an estimate based on everything that needs to be done. And we are only halfway through the repairs. Since these repairs MUST be made, they will be restored back to the condition I was expecting and seeing in the images provided by Volo Auto Sales.

I'm not expecting you to cover the entire cost but those items that are clearly a misrepresentation of the vehicle's condition e.g. "ready to show and go" I would expect to be compensated for. You rated the exhaust as a 5 on your Appraisal and I'm not sure how you came to that conclusion based on the exhaust system damage that is present. There were stripped header bolts, along with a hole and other damage in one of the header pipes (see attached PDF).

I have hired a professional photographer to come in and take photos during the remainder of this process. The comparison of images from the advertisement and what was actually received is a night and day difference. I'm beginning to wonder if you actually saw the condition of this vehicle when it left your facility in July 2021.

I understand your position and wish to thank you for your prompt confirmation."



Saturday, February 26, 2022, 05:59 [Buyer]

"Good day Jay. We are getting close to completion of repair of the 1955 Ford Crown Victoria. I'm currently \$36,009.24 into the repairs with at least another \$10,000 to go. I wanted to reach out one last time to see if Volo Auto Sales is going to reimburse me for any of these "UNEXPECTED AS-IS" costs to get the vehicle on the road again.

I am documenting the process here...

https://c8dence.com/gallery/restoration

https://c8dence.com/history/sales

I still have hundreds of images to go through to determine which ones will be used as exhibits. Before I set aside funds to deal with the civil litigation, I just wanted to provide VAS with the opportunity to correct this.

The repairs won't be finished until May 2022. We've had personnel issues, supply chain issues, etc. I can't finalize anything until all the repairs have been done and all invoices have been paid in full.

I really don't want to deal with litigation but due to how all of this transpired, I have no other choice.

Thank you in advance for your prompt attention to this matter.

Nice wheels huh? This is what your local collector did after you made your video."





Wednesday, March 16, 2022, 07:02

[Buyer]

"Good day Jay. Since there was no response to my previous email dated Saturday, February 26, 2022, I can only surmise that your original response of "Otherwise do what you need to do." stands.

I've filed a Consumer Fraud Complaint (OAG2022-000105504) with the Illinois Attorney General as my first step. I submitted a 55 page document outlining what transpired before and after purchase.

I'd rather not incur any further expenses dealing with attorneys. I have a variety of options available to me before I make that investment. I respectfully request that you reconsider your position regarding this vehicle.

Thank you."

Thursday, March 31, 2022, 02:28

[Buyer]

"Good day Jay and to those on the CC/BCC lists. I wanted to let you know that the Illinois Attorney General Consumer Fraud Bureau has accepted my 55 page complaint, the file number is 146031.

Again, I respectfully request that you reconsider your position regarding this vehicle.

https://c8dence.com/history/restoration

"At Volo Museum Auto Sales, we love classic cars. We love them so much that we built a museum for them. Unlike other dealerships, we care about the history of the cars we purchase and ensure that we only sell vehicles that have undergone rigorous inspections."

^ Apparently the above is not true in my case. This vehicle did NOT undergo a rigorous inspection.



Thursday, March 31, 2022, 06:15

Jay Grams, Buyer/Co-Owner, VAS

"Thank you for the update. We look forward to the review and will cooperate with the Attorney General."

Friday, May 20, 2022, 11:11

Brian Grams, Museum Director, VAS

"We have communicated with [Buyer] via email and have already given him our perspective. [Buyer] purchased a 67 year old used car that had undergone a restoration 15 years prior to his purchase. None of his complaints are untypical of a 67 year old car with a 15 year old restoration. The statements we provided on condition are opinion based and we stand firm with our opinions. Besides our opinions, we know the owner history of this car and the previous owners all agree how incredible it is, as a matter of fact one of the previous owners offered to purchase the car back. The car has won numerous top awards and has been featured in magazines.

The restoration work [Buyer] is performing is not out of necessity nor does it offer safety issues. He would like to raise the overall caliber of the car to the condition it was 15 years prior when the car was first restored. The cost to bring the car to that condition at that time was \$250,000. Our sales price was \$74,998. We were not offering a \$250k car for \$75k.

We are a collector car dealer with an excellent reputation and are regarded as an authority in the industry. We are open daily 10-5 to the public allowing prospective buyers to view our cars in person. Every buyer has the right to inspect our cars personally before purchasing, are allowed to test drive or have the car inspected by a 3rd party prior to purchase. [Buyer] declined to inspect the car personally however he did speak to the person who did the restoration work. All of our cars are sold as-is and it is up to the buyer to do their due diligence prior to purchase, not after. We make this very clear on our bill of sale and documents, all of which were signed by [Buyer] including an acknowledgement that he rejected his option to inspect the car. Copies are attached.

Furthermore when [Buyer] contacted us about his disappointment of the car we offered to buy it back at the full purchase price because we knew it was a very nice car and very fairly priced and we would not have an issue reselling it at that price if not more. [Buyer] declined because he had already begun his restoration process and invested money into the car which took that option off the table. The work [Buyer] is doing to the car isn't to make it a \$75k car, it is to bring it back to the original value which was \$250k."



C8DENCE – Expenses – Cambra Speed Shop

Exper	nses Ca	ambra Tasks V	AS Crevie	r (Before) Cambra (Before) Cambra (After)				Revised:	Thu, Jun 2, 202
380	DEN	CE – Expe	enses	 Cambra Speed Shop 				Only	SPEED SH
#	VAS	Inv Date	Inv No	Item	Qty	Unit Price	Tax	Freight	Total
1		2021-08-15	14487	Inspection, Research, Planning	3.0	\$85.00			\$255.00
2		2021-08-15	14487	Holley Sniper EFI 550-510 (Polished, 650 HP)	1	\$2,267.00	\$175.69	\$75.00	\$2,517.69
3		2021-08-15	14487	Weiand Stealth™ Dual Plane Intake Manifold	1				
4		2021-08-15	14487	Tank Hanger	1				
5		2021-08-15	14487	CD Ignition Box	1				
6		2021-08-15	14487	EFI Distributor	1				
7	✓	2021-09-19	14557	Materials, Filler, Sandpaper, Mandarin Copper, Clear	1	\$398.70			\$398.7
8	✓	2021-09-19	14557	Prep and Paint Engine Box Inner Panel, Crossmember	19.0	\$85.00			\$1,615.0
9	✓	2021-09-19	14557	Transmission (Testing, Bearings, Seals)	1	\$939.00			\$939.0
10	✓	2021-09-19	14557	New Clutch Assembly, Pressure Plate, Throwout Bearings	1	\$281.00			\$281.0
11	✓	2021-09-27	14573	Prep and Paint Motor Materials	1	\$286.80			\$286.8
12	✓	2021-09-27	14573	Prep and Paint Motor, Transmission, Bell Housing	22.0	\$85.00			\$1,870.0
13	✓	2021-09-27	14573	Headers (Recoat)	1	\$400.00			\$400.0
14		2021-09-27	14573	Polish Weiand Stealth™ Dual Plane Intake Manifold	1	\$370.00			\$370.0
15	✓	2021-09-27	14573	New Clutch Assembly Additional Cost	1	\$75.00	\$5.81		\$80.8
16	✓	2021-10-07	14604	March Serpentine Belt System Polishing	1	\$520.00			\$520.0
17	✓	2021-10-07	14604	Oil Pan Gasket, Rear Main Seal, Intake/Manifold Gaskets	1	\$240.00	\$18.60		\$258.6
18		2021-10-07	14604	Reinstall Hood, Gather All Parts	2.0	\$85.00			\$170.0
19	✓	2021-10-14	14619	Stainless Header and Intake Bolts	1	\$216.00	\$16.74		\$232.7
20		2021-10-20	14634	Blue Thunder Finned Valve Covers	1	\$374.00		\$110.80	\$484.8
21	✓	2021-11-29	14685	Undercarriage Breakdown and Cleanup	10.0	\$85.00			\$850.0
22	✓	2021-12-06	14693	Remove Undercarriage and Cleanup Bottom of Car and Chassis	18.0	\$85.00			\$1,530.0
23	✓	2021-12-06	14693	Materials for Prep and Paint Work	1	\$579.00			\$579.0
24	✓	2021-12-06	14693	Strip Rear End, Prep Housing, Sand Fuel Tank, Prep Both for Paint	14.0	\$75.00			\$1,050.0
25	✓	2021-12-07	14697	Rebuild Third Member	1	\$676.00			\$676.0
26	✓	2021-12-20	14719	Receipt for Gear Oil, Treatment for Rear End	1	\$79.50			\$79.5
27		2021-12-20	14719	Finned Oval Air Cleaner	1	\$265.00	\$26.70		\$291.7
28	✓	2021-12-20	14719	Finish Tear Down, Front Suspension, Coil Overs, Rack	10.5	\$85.00			\$892.5
29	✓	2021-12-21	14722	15x7 OEM Ford Wheels with 5x4.5 Back Space	4	\$225.00	\$69.75		\$969.7
30	√	2021-12-27	14729	Rebuild Flaming River Rack and Pinion	1	\$357.50			\$357.5
31	✓	2021-12-27	14729	Parts Cleaning	8.5	\$85.00			\$722.5
32	1	2021-01-02	14740	Clean Fuel Tank	1	\$75.00			\$75.0



34	✓	2021-01-02	14740	Pressing Out Old Bushings, Measure for New, Finish Cleaning Parts	6.0	\$85.00		\$510.00
35		2022-01-09	14750	Rick Fabricating Lower Shield for Crossmember	3.0	\$85.00		\$255.00
36	✓	2022-01-09	14750	Paint Materials	1	\$127.00		\$127.00
37	✓	2022-01-09	14750	Finish Prepping Rear End Housing, Third Member, Fuel Tank, Seal, Base Color, Clear	11.0	\$75.00		\$825.00
38	✓	2022-01-24	14769	Rebuilding of Coil Overs	1	\$425.00		\$425.00
39	✓	2022-01-24	14769	All New Hardware for Suspension Installation	1	\$180.70	\$14.00	\$194.70
40	✓	2022-01-24	14769	New Axle Seals	2	\$11.90		\$23.80
41	✓	2022-01-24	14769	Install Bushings, Hardware, Control Arms, Rack, Coil Overs, Third Member	37.0	\$85.00		\$3,145.00
42	✓	2022-01-31	14780	Sand and Prep Driveshaft, Fan Shroud, Tranny Mount Cross Member, Prime, Paint, Clear	12.0	\$75.00		\$900.00
43	✓	2022-01-31	14780	New Wheel Bearings and Seals, New Pads for Wilwood Calipers	1	\$139.00		\$139.00
44	✓	2022-01-31	14780	Receipt to Rebuild Rear Calipers	1	\$370.50		\$370.50
45	✓	2022-01-31	14780	Rhino Install: New Gas and Vent Hoses for Fuel Tank, Prep Tank for Install, Install Fuel Tank, Install Axles and Rear Brakes, Finish Installing Front Suspension	12.0	\$85.00		\$1,020.00
46	✓	2022-01-31	14780	Vince Install: Front Sway Bar, Hang Rear Suspension, All New Hardware, Install New Brakes, Install Old Wheels (Roller Only)	12.0	\$85.00		\$1,020.00
47	✓	2022-02-03	14788	Vince and Rhino: Assemble/Install Transmission, Motor, Steering Shaft, Cross Member, Finish Brakes	27.5	\$85.00		\$2,337.50
48		2022-02-14	14795	Catcall Whistle Horn	1	\$92.50	\$22.71	\$115.21
49	✓	2022-02-14	14795	Transmission Mount	1	\$20.48		\$20.48
50	✓	2022-02-14	14795	Gear Oil and Type ATF	1	\$133.00		\$133.00
51	✓	2022-02-14	14795	Receipt for Stainless Clamps and Fittings	1	\$33.00		\$33.00
52	✓	2022-02-14	14795	New Power Steering Pump	1	\$180.00		\$180.00
53	✓	2022-02-14	14795	Vince and Rhino: Install Parts Back On, Installed Transmission Mount and Cross Member, Installed Driveshaft, Clean and Paint Fan, Clean and Polish A/C Compressor, Install Water Pump, Route Engine Wiring, Mounted Alternator, Upper Tension Arm, Lower Accessory Pulley Kit, Installed New Power Steering Pump, Pulleys, Wrap Wiring with New Cover Loom, Replaced Bolts on Manifold with New Ones, Hookup Hydraulic Clutch	40.0	\$85.00		\$3,400.00
54		2022-03-14	14841	Gear Vendors Under/Overdrive	1	\$3,404.00	308.18	\$3,712.18
55		2022-03-14	14841	15x7 OEM Ford Wheel with 5x4.5 Back Space (Spare)	1	\$225.00		\$225.00
56		2022-03-14	14841	BF Goodrich Silvertown Radial Tire (Spare)	1	\$347.53		\$347.53
57		2022-03-14	14841	Receipt for Polishing Valve Covers, Air Cleaner	1	\$360.00		\$360.00
58	✓	2022-03-14	14841	Materials to Paint Wheels, Valve Covers, Air Cleaner	1	\$285.00		\$285.00
59	✓	2022-03-14	14841	Prep, Paint Wheels, Valve Covers, Air Cleaner	15	\$85.00		\$1,275.00
60				Stainless Steel Braided Hoses (No Rubber Remaining)				
61				Hood Release				
62				Engine Box (Custom Bulkhead Panels)				



63			Electrical Draw								
64			Shifter Position								
65			Security (Door Locks)								
66			Passenger Door Alignment								
67			Driver's Seat Motor								
68			Cadillac Wheel Covers (Refresh)								
69			Complete Detail								
70	2021-09-19	14557	Air Cleaners for Carbs to be Shipped	2	\$62.00	\$9.61		\$133.61			
71	2021-10-07	14604	Cleanup Old Intake and Carbs, Ship to Fred Piluso (Ohio)	3	\$85.00			\$255.00			
72	2021-10-14	14619	Shipping Charge with Insurance for Intake and Carbs	1	\$195.00			\$195.00			
73			Vehicle Weight (O'Neil Storage Public Scale)								
	Sub-Total on 2022-03-14:										
Deposit on 2021-08-09:											
					Wire Transf	er on 202	1-10-27:	+ \$1,263.75			
					Depo	sit on 202	1-12-02:	+ \$10,000.00			
Wire Transfer on 2022-01-12:											
Wire Transfer on 2022-02-15:											
Wire Transfer on 2022-02-24:											
Wire Transfer on 2022-03-30:											
Balance as of 2022-03-30:											