BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

EXHIBITS OF RIDE THE DUCKS OF SEATTLE, LLC D/B/A SEATTLE DUCK TOURS FOR REINSTATEMENT OF STRETCH DUCK VEHICLES

Exhibit 1	Excerpt of NTSB/HAR – 16/02 PB2017-100408 at p. 55
Exhibit 2	NHTSA and RTDI Consent Order
Exhibit 3	Safety Recall Owner Letter – 16V-859
Exhibit 4	Safety Recall Owner Letter – 17V-501
Exhibit 5	Part 573 Safety Recall Report 16V-859, 11/22/2016
Exhibit 6	Part 573 Safety Recall Report 16V-859, 5/4/2017
Exhibit 7	Part 573 Safety Recall Report 17V-501, 8/11/2017
Exhibit 8	Order 09 – TE-151906
Exhibit 9	NDT Steer Axle Report – Pre-Coupler
Exhibit 10	NDT Steer Axle Report – Post-Coupler
Exhibit 11	REI Verification Letter & Credentials
Exhibit 12	Annual Vehicle Inspection Report, Duck #19
Exhibit 13	Ride the Ducks of Seattle NDT Procedures
Exhibit 14	Backeye 360 camera system specifications
Exhibit 15	Backsense Brochure
Exhibit 16	GPS Fleet Tracking System ST-2500

Exhibit 1

4 Recommendations

4.1 New Recommendations

As a result of its investigation, the National Transportation Safety Board makes the following new safety recommendations:

To the National Highway Traffic Safety Administration:

Require that Ride the Ducks International, as a manufacturer, issue a recall for the stretch amphibious passenger vehicle front axle safety defect to provide owners a remedy as required under the Safety Recall Campaign. (H-16-17)

Adopt the US Coast Guard's assumed average weight per person and amend the certification regulation in 49 *Code of Federal Regulations* Part 567 to specify that the gross vehicle weight rating for an amphibious passenger vehicle "shall not be less than the sum of the unloaded vehicle weight, the rated cargo load, and 185 pounds times the vehicle's number of designated seating positions." (H-16-18)

Classify all amphibious passenger vehicles (APV) as non-over-the-road buses and, under the authority of the National Traffic and Motor Vehicle Safety Act of 1966, make newly manufactured APVs subject to applicable *Federal Motor Vehicle Safety Standards* in effect at the time of manufacture. (H-16-19)

To the US Coast Guard:

Amend Navigation and Vessel Inspection Circular 1-01 to ensure that (1) amphibious passenger vehicle (APV) operators tell passengers that seat belts must not be worn while the vessel/vehicle is operated in the water and (2) before the APV enters the water or departs the dock, the master or other crewmember visually checks that each passenger has unbuckled his or her seat belt. (M-16-26)

Distribute a safety alert on amphibious passenger vehicle operations that addresses the role of risk assessment to mitigate driver distraction, as well as the need to tell passengers to remove seat belts before waterborne operations begin. (M-16-27)

To Ride the Ducks International:

Develop a thoroughly verified and tested repair or alternative axle housing for the front axles of your stretch amphibious passenger vehicles (APV), and repair or replace the axle housings on your own stretch APVs as necessary. (H-16-20)

Communicate the repair or replacement information concerning the front axle housings of your stretch amphibious passenger vehicles, developed in response to Safety Recommendation H-16-20, to your franchisees and licensees. (H-16-21)

Instruct your franchisees and licensees to immediately halt operation of their stretch amphibious passenger vehicles and not resume operations until they complete the axle housing repair or replacement process developed in response to Safety Recommendation H-16-20. (H-16-22) (Urgent)

To Ride the Ducks of Seattle:

Add to your 250-hour and annual inspection processes a procedure to verify that all actions indicated in service bulletins have been completed on all inspected vehicles. (H-16-23)

To the Passenger Vessel Association:

Notify all your amphibious passenger vehicle (APV) operator members of the importance of the following: (1) learning the lessons from the Seattle, Washington, and Boston, Massachusetts, crashes; (2) completing proper maintenance and service bulletin repairs; (3) using the pretrip safety orientation to tell passengers of APVs equipped with passenger seat belts to unbuckle their belts before the APV begins any marine operations; (4) conducting a visual inspection to ensure that passengers have unbuckled their seat belts prior to water entry; (5) reducing the risk of driver distraction by having a tour guide conduct each tour; (6) managing risk in tour operations by addressing such factors as driver distraction, route planning, vehicle characteristics, traffic density, and vehicle speed; and (7) conducting operations according to Navigation and Vessel Inspection Circular 1-01 guidance and US Coast Guard safety alerts. (M-16-28)

BY THE NATIONAL TRANSPORTATION SAFETY BOARD

CHRISTOPHER A. HART
Chairman

ROBERT L. SUMWALT
Member

T. BELLA DINH-ZARR
Vice Chairman

EARL F. WEENER
Member

Adopted: November 15, 2016

Exhibit 2

UNITED STATES DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
1200 New Jersey Avenue SE
Washington, D.C. 20590

In re:	)
	)
Ride the Ducks International, LLC	)
	)
	)

CONSENT ORDER

This Consent Order is issued pursuant to the authority of the National Highway Traffic Safety Administration ("NHTSA"), an operating administration of the U.S. Department of Transportation, administratively to resolve a NHTSA enforcement action, mitigate and control risks of harm, and promote safety. It sets forth the requirements and performance obligations of Ride the Ducks International, LLC ("RTDI"), in connection with RTDI's violations of the National Traffic and Motor Vehicle Safety Act ("Safety Act") and NHTSA's regulations as detailed herein under the following terms and conditions.

I. NATURE OF THE ACTION

1. The Safety Act provides for regulation of motor vehicles and motor vehicle equipment by the Secretary of Transportation. 49 U.S.C. § 30111. The Secretary has delegated his authorities under the Safety Act to the NHTSA Administrator. 49 C.F.R. §§ 1.95(a), 501.2(a)(1).

2. The Safety Act applies to "manufacturers." 49 U.S.C. § 30102(a)(6). A manufacturer is defined as a person "manufacturing or assembling motor vehicles or motor vehicle equipment." *Id.*

3. The Safety Act applies to "motor vehicles," defined as vehicles "driven or drawn by mechanical power and manufactured primarily for use on public streets, roads, and highways, but does not include a vehicle operated only on a rail line." 49 U.S.C. § 30102(a)(7).

4. Under 49 C.F.R. § 571.7(e), certain vehicles built with a combination of new and used components are not considered to be new vehicles whose rebuilders must comply with the Safety Act. The "glider" exemption applies when a new cab or body is put on a truck when the engine, transmission, and axles are not new and at least two of those components are from the same vehicle. 49 C.F.R. § 571.7(e). The rule mainly applies to truck "glider" kits, as well as buses, that use new cabs with old parts.

5. Under 49 C.F.R. § 571.7(c), vehicles "manufactured for and sold directly to, the Armed Forces of the United States in conformity with contractual specifications" do not need to meet the FMVSS. This exception to the Safety Act's applicability does not apply in instances where a military vehicle has been extensively modified or otherwise serves as a donor for what is essentially a new vehicle. In a November 30, 1987 NHTSA interpretation letter responding to an inquiry from D.F. Landers, President of Mobile Products, Inc., asking, among other things, if surplus military vehicles were subject to NHTSA's jurisdiction, the Agency stated that surplus military "vehicles might become subject to Federal motor vehicle safety standards if there is a material change in . . . the intended or actual use, design or sale . . . ." of the vehicle. *See* NHTSA Interpretation Letter to D.F. Landers, President of Mobile Products, Inc. (Nov. 30, 1987).

6. Under the Safety Act and implementing regulations, a manufacturer of motor vehicles or equipment has a duty to notify NHTSA if the manufacturer learns or determines in good faith that there is a defect related to motor vehicle safety or a noncompliance with an applicable FMVSS. 49 U.S.C. § 30118(c)(1); 49 C.F.R. Part 573. The manufacturer's notice to NHTSA must be in the form specified by regulation, and is known as a "Defect Information Report" or "Part 573 Report." 49 C.F.R. Part 573. NHTSA's regulations require a manufacturer to notify NHTSA not more than five working days after a defect in a vehicle or an item of equipment has been determined to be safety-related or noncompliant with an applicable FMVSS. 49 C.F.R. § 573.6(b). However, the manufacturer's duty to notify and remedy begins "whether it

actually determined, *or it should have determined*, that its vehicles are defective and the defect is safety-related." *United States v. General Motors Corp.*, 656 F. Supp. 1555, 1559 n. 5 (D.D.C. 1987), *aff'd on other grounds*, 841 F.2d 400 (D.C. Cir. 1988) (emphasis added).

7. A manufacturer of motor vehicles or equipment also has a duty to notify owners, purchasers, and dealers when it determines that any motor vehicle or equipment contains a defect that relates to motor vehicle safety or a noncompliance with an applicable FMVSS. *See* 49 U.S.C. §§ 30118(c), 30119; 49 C.F.R. Part 577. The notification to owners or purchasers must have been "furnished no later than 60 days from the date the manufacturer files its defect or noncompliance information report under part 573." *See* 49 U.S.C. § 30119; 49 C.F.R. § 577.7(a)(1). The duty to notify and remedy arises when the manufacturer determined or should have determined that there was a safety-related defect or noncompliance. *United States v. General Motors Corp.*, 656 F. Supp. 1555, 1559 n. 5 (D.C. 1987), *aff'd on other grounds*, 841 F.2d 400 (D.C. Cir. 1988).

8. When a manufacturer learns that a motor vehicle or motor vehicle equipment contains a defect and it decides in good faith that the defect is related to motor vehicle safety, the Safety Act imposes a duty to remedy the motor vehicle. *See* 49 U.S.C. § 30120; 49 C.F.R. Part 573. The manufacturer is responsible for remedying the safety-related defect within a reasonable time. *See* 49 U.S.C. § 30120; 49 C.F.R. § 573.5. According to case law, "a manufacturer incurs its duties to notify and remedy whether it actually determined, or it should have determined, that its vehicles are defective and the defect is safety-related." *United States v. General Motors Corp.*, 656 F. Supp. 1555, 1559 n. 5 (D.C. 1987), *aff'd on other grounds*, 841 F.2d 400 (D.C. Cir. 1988). The manufacturer also has a duty to recall any motor vehicles or motor vehicle equipment that fail to comply with applicable FMVSS under these same procedures. *See* 49 U.S.C. § 30120; 49 C.F.R. Part 573.

9. As required by the Transportation, Recall Enhancement, Accountability, and Documentation ("TREAD") Act, NHTSA requires reporting of "Early Warning Information" based on the type of manufacturer. *See* 67 Fed. Reg. 45,822 (July 10, 2002). The first group consists of larger manufacturers of motor vehicles and all manufacturers of child restraint systems and tires. *See* 49 C.F.R. §§ 579.21-579.26. These manufacturers are required to report, on a quarterly basis, production information, information on incidents involving death or injury, and data regarding property damage claims, consumer complaints, warranty claims, and field reports. *See* 49 C.F.R. §§ 579.21-579.26. The second group consists of all other manufacturers of motor vehicles and motor vehicle equipment, including manufacturers of fewer than 100 buses annually. *See* 49 C.F.R. § 579.27. This second group of manufacturers must report the same information about incidents involving deaths as the first group, but is not required to report any other "Early Warning Information." *Id.*

10. Manufacturers of motor vehicles and motor vehicle equipment are required to submit to NHTSA copies of all notices, bulletins, and other communications, including those related to any defect in its vehicles or items of equipment, a customer satisfaction campaign, consumer advisory, recall, or other safety activity involving the repair or replacement of motor vehicles or equipment (collectively, "service bulletins"), sent to more than one manufacturer, distributor, dealer, owner or purchaser. *See* 49 U.S.C. § 30166(m)(3)(A)(ii); 49 C.F.R. §§ 579.5(a)-(b). A copy of each communication shall be submitted to NHTSA not later than five working days after the end of the month in which it was issued. 49 C.F.R. § 579.5(d). All manufacturers must also submit an index to the communications that "identifies the make, model, and model year of the affected vehicles" and "includes a concise summary of the subject matter of the communication." 49 U.S.C. § 30166(f)(2); 49 C.F.R. § 579.5. Manufacturers are required to submit to the Agency an index for each communications to dealers, owners, or

purchasers about a defect or noncompliance they were required to submit at any time since October 1, 2012. *See* 49 U.S.C. § 30166(f)(2); 81 Fed. Reg. 16,270 (March 25, 2016).

11. In general, motor vehicles must comply with applicable FMVSS and must be certified as such at the time of delivery. 49 U.S.C. §§ 30112(a), 30115. This certification must take the form of a label certifying compliance with applicable FMVSS that is permanently affixed by the manufacturer. 49 U.S.C. § 30115; 49 C.F.R. Part 567. Manufacturers of motor vehicles are responsible for "self-certifying" that their products meet all applicable FMVSS before they are offered for sale. *See* 49 U.S.C. §§ 30112, 30115.

12. Manufacturers of motor vehicles are required to submit identifying information and a description of the items they produce to NHTSA. 49 U.S.C. § 30166(e); 49 C.F.R. Part 566. Manufacturers must report this information no later than 30 days after manufacturing begins. 49 C.F.R. § 566.6.

13. Manufacturers of motor vehicles are also required to assign Vehicle Identification Numbers ("VINs") in accordance with 49 C.F.R. Part 565. 49 U.S.C. § 30166(e); 49 C.F.R. Part 565.

14. A person who violates the notification requirements, remedy requirements, or certification requirements of the Safety Act, or a regulation thereunder, is liable to the United States Government for a civil penalty. 49 U.S.C. § 30165(a)(1); 49 C.F.R. § 578.6(a). A separate violation occurs for each motor vehicle or item of motor vehicle equipment and for each failure or refusal to allow or perform a required act. 49 U.S.C. § 30165(a)(1); 49 C.F.R. § 578.6(a). As of December 27, 2012, the maximum penalty per violation was $7,000. 77 Fed. Reg. 70,710, 70,713 (Nov. 27, 2012) (codified at 49 C.F.R. § 578.6). That penalty increased from $7,000 to $21,000 per violation effective March 17, 2016. 81 Fed. Reg. 15,413 (Mar. 22, 2016). The maximum penalty for a related series of violations is currently $105 million. *See id.* A person who violates 49 U.S.C. § 30166, 49 C.F.R. Part 565, 49 C.F.R. Part 566, and 49 C.F.R. Part 579

is liable to the United States for a civil penalty. *See* 49 U.S.C. § 30165(a)(3). As of December 27, 2012, the maximum penalty was $7,000 per day. 77 Fed. Reg. 70,710, 70,713 (Nov. 27, 2012) (codified at 49 C.F.R. § 578.6). Effective March 17, 2016, the maximum civil penalty was increased from $7,000 to $21,000 per day. *See* 81 Fed. Reg. 15,413 (Mar. 22, 2016) (codified at 49 C.F.R. § 578.6(a)(3)). The maximum penalty for a related series of daily violations is currently $105 million. *See id.*

15. RTDI is the current owner, operator, and licensor of certain amphibious vehicles and amphibious vehicle tour bus operations. RTDI operates tour operations which run amphibious vehicles on both the public roads and the public waterways. RTDI or its predecessor corporations manufactured amphibious vehicles (either directly or through a contract manufacturer) and sold the vehicles to a limited number of independent licensees who operate similar tour services. In total, there are currently 106 amphibious vehicles produced by RTDI either in operation or ready for use in the United States.

16. According to RTDI, RTDI's predecessor corporation began to produce and operate amphibious vehicles in 1977 in Branson, Missouri. The original amphibious vehicles were reconstructed WWII-era DUKW amphibious vehicles used for transport over land and water without harbors. These amphibious vehicles were retired in 2006.

17. RTDI also states it began manufacturing "Stretch" Duck amphibious vehicles in 1996. The "Stretch" Duck construction process began by stripping down an original DUKW to its frame and then renewing and lengthening the hull, replacing the engine, transmission and axles with new components or components sourced from other vehicles, changing the number of driven wheels and upgrading the brakes to all-wheel disc brakes. There are currently 57 "Stretch" Ducks either in operation or ready for use in the United States. In 2005, RTDI introduced the "Truck" Duck with a patented RTDI design. The "Truck" Duck is based on a M-Series 2 1/2 ton military cargo vehicle and its construction also involved substantial upgrading

and replacement of original components and the complete fabrication of a hull on the existing frame. There are currently 49 "Truck" Ducks either in operation or ready for use in the United States. Both the "Stretch" and the "Truck" Ducks are under 26,000 lbs. loaded weight.

18. RTDI represents that all amphibious vehicles that it operated or produced were appropriately registered within the state or territories in which they have operated. RTDI further represents that throughout its history, RTDI worked closely with the Coast Guard to meet and/or exceed all applicable marine standards. RTDI also represents that it has sponsored industry efforts to discuss and disseminate best safety practices for the operation of amphibious tour buses.

19. On October 1, 2013, RTDI issued a Service Bulletin (SB-00-14-13) to its licensees with regard to the potential for the front axle on the Stretch Ducks to fail. RTDI represents that all affected vehicles under its control were properly repaired in accordance with the Service Bulletin, and that it repeatedly reminded its licensees of the importance of conducting the repair on the vehicles within their fleets. The Service Bulletin stated it was released to "avoid axle fractures" and further stated that the axles should be repaired as soon as it was practical to do so and prior to operating in 2014. The Service Bulletin further stated that until the axle was repaired, the axles should be inspected on a daily basis.

20. On September 24, 2015, a Stretch Duck owned and operated by Ride the Ducks of Seattle was involved in a crash with a 2009 MCI motor coach while both vehicles were traveling over the George Washington Memorial Bridge (a.k.a. the Aurora Bridge), resulting in fatalities. Although the Stretch Duck involved in the crash had a front axle with the defect addressed by the October 1, 2013 Service Bulletin, it had not been repaired as directed by that bulletin.

21. After learning of the Aurora Bridge crash, NHTSA issued an Information Request to RTDI. In April 2016, RTDI submitted a timely response, which included the October 2013 Service Bulletin and all other Service Bulletins issued by RTDI to its operations and its

licensees. RTDI's response also included a number of lawsuits filed against RTDI related to the Aurora Bridge crash, some of which were received by RTDI during 2015.

22. Review of RTDI's submissions led NHTSA to conclude that RTDI is a "manufacturer" of "motor vehicles" under the Safety Act. The RTDI Stretch Duck vehicles used the frame, some hull sections, and miscellaneous other parts from donor WWII vintage DUKWs while a new hull, new engine, new transmission, refurbished axles from donor vehicles, new brakes, and new drive configuration were incorporated into the final product. The Stretch Ducks are not rebuilt vehicles under NHTSA regulations because three requisite components (engine, transmission, and axles) were changed and no two are from the same vehicle. 49 C.F.R. § 571.7(e). RTDI does not contest that it manufactured motor vehicles under the Safety Act.

23. RTDI has provided NHTSA with confirmation that all RTDI produced amphibious vehicles affected by the October 1, 2013 Service Bulletin other than those at Ride the Ducks Seattle (which are currently out of service) have had the axle repair conducted.

24. NHTSA issues this Consent Order pursuant to its authority under the Safety Act, 49 U.S.C. § 30101, et seq., as delegated by the Secretary of Transportation, 49 C.F.R. §§ 1.95, 501.2(a)(1), to compromise the amount of civil penalties for violations of the Safety Act and regulation thereunder, 49 U.S.C. § 30165(b), to inspect and investigate, 49 U.S.C. § 30166(b)(1), to ensure that defective vehicles are recalled, 49 U.S.C. §§ 30118-30119, and to require any person to file reports or answers to specific questions, 49 U.S.C. § 30166(g). It is AGREED by RTDI and ORDERED by NHTSA as follows:

II. TERMS AND CONDITIONS OF CONSENT ORDER

A. Admission of Safety Act Violations

25. RTDI did not comply with the legal obligations imposed on vehicle manufacturers by the Safety Act and represents that it acted on a good faith belief that only Coast Guard marine safety regulations and state level road safety rules were applicable to the

amphibious vehicles it manufactured. Nonetheless, RTDI agrees that as a matter of law, ignorance of its legal obligations under the Safety Act is not a defense. RTDI admits that it manufactured vehicles for sale that do not comply and/or are not certified as complying with applicable FMVSS, in accordance with 49 U.S.C. § 30112. RTDI also failed to submit service bulletins and other communications to NHTSA, including its October 1, 2013 service bulletin, in accordance with 49 C.F.R. § 579.5, and did not report claims that a defect in its products caused a death, including the September 2015 crash, in accordance with 49 C.F.R. § 579.27. RTDI also did not notify NHTSA of the safety defect in its 57 Stretch Ducks in accordance with 49 C.F.R. Part 573, did not provide a remedy for axle defect without charge as directed by 49 U.S.C. § 30120 and admits that its communication to owners regarding a safety related defect in the 57 Stretch Duck axles did not fully comply with 49 C.F.R. § 577.5 (describing potential safety consequences of a defect).

B. Civil Penalty

26. RTDI agrees that the United States is entitled to a civil penalty of up to one million dollars ($1,000,000) for the violations set forth above, subject to the provisions of this Consent Order and applicable law, including the Federal Claims Collection Act of 1966, as amended and codified at 31 U.S.C. § 3701, *et seq.* (hereinafter the "Debt Collection Act") (the "Total Civil Penalty").

27. To satisfy its obligations to pay a civil penalty, as authorized by 49 U.S.C. § 30165(b), RTDI shall pay the sum of four hundred eighty thousand dollars ($480,000.00) in accordance with the instructions provided in Paragraph 28 below (the "Non-Deferred Amount"). RTDI shall use the remaining twenty thousand dollars ($20,000) to ensure satisfactory completion, as determined by NHTSA, of certain performance obligations described below in Paragraphs 49 through 52 (the "Industry Outreach Amount"). In the event RTDI commits further violations of the Safety Act or this Consent Order during the term of this Consent Order,

RTDI may, in addition to any civil penalties that would otherwise accrue, be potentially obligated to pay additional sums totaling up to a maximum of five hundred thousand dollars ($500,000), in accordance with the terms and conditions set forth below (the "Deferred Amount").

28. RTDI shall make a payment of two hundred forty thousand dollars ($240,000) no later than May 14, 2017. The remaining two hundred forty thousand dollars ($240,000) shall be due in three equal annual increments due not later than May 14, 2018, May 14, 2019, and May 14, 2020 respectively. At its option, RTDI may pay any remaining amounts prior to their respective due dates. RTDI expressly agrees that the obligation to pay the foregoing sums as specified above shall survive the termination of this Consent Order.

29. The Deferred Amount shall only become due and owing in accordance with and subject to the provisions set forth in Paragraph 30 below. NHTSA and RTDI expect that RTDI will comply fully with this Consent Order and the Safety Act and that the Deferred Amount accordingly will not become due and will be released at the termination of this Consent Order. In the event RTDI is required to pay any of the Deferred Amount, such payments will be made by electronic funds transfer, in accordance with the instructions provided by NHTSA, no later than thirty (30) calendar days following a determination that they are due and owing.

30. Should NHTSA receive notice or make its own determination that RTDI has materially violated the Safety Act, regulations thereunder, or the terms of this Consent Order, a lump-sum payment of fifty thousand dollars ($50,000) of the Deferred Amount will become due and owing within thirty (30) calendar days, in accordance with instructions provided by NHTSA. Upon a second notice or determination by NHTSA that RTDI has materially violated the Safety Act, regulations thereunder, or the terms of this Consent Order, an additional lump-sum payment of one hundred fifty thousand dollars ($150,000) of the Deferred Amount will become due and owing within thirty (30) calendar days, in accordance with instructions provided by NHTSA.

Upon a third notice or determination by NHTSA that RTDI has materially violated the Safety Act, regulations thereunder, or the terms of this Consent Order, the remaining three hundred thousand dollars ($300,000) of the Deferred Amount will become due and owing within thirty (30) calendar days, in accordance with the instructions provided by NHTSA. RTDI will not be liable for the above amounts if RTDI demonstrates to NHTSA's reasonable satisfaction that it acted in good faith and exercised reasonable best efforts to comply.

31. If RTDI fails to make any of the payments set forth above, RTDI shall be in default of this Consent Order and the balance of the Total Civil Penalty shall become immediately due and owing. In such event: (i) RTDI agrees not to contest any collection action undertaken by NHTSA or the United States pursuant to the Debt Collection Act and the U.S. Department of Transportation's regulations, 49 C.F.R. Part 89, either administratively or in any court, and (ii) RTDI affirmatively waives any and all defenses or rights that would otherwise be available to it in any such proceeding. In addition, in such a proceeding, RTDI shall pay the United States all reasonable costs of collection and enforcement, including attorneys' fees and expenses. NHTSA in its sole discretion may waive or reduce any stipulated penalties owing under this Consent Order.

C. Performance Obligations

32. This Consent Order requires RTDI to execute certain performance obligations, the objectives of which are to assist NHTSA in its mission to, among other things, carry out safety programs under the Safety Act and to improve RTDI's processes and procedures for making safety-related defects and noncompliance determinations, reporting defects and noncompliances to NHTSA in a timely manner, and complying with reporting requirements. These performance obligations will be satisfied through the activities set forth in Paragraphs 34 through 54 below.

33. NHTSA will consider any and all remedial actions that RTDI has undertaken prior to the execution of this Consent Order in determining whether RTDI has carried out the performance requirements of this Consent Order.

1. Remedying Past Noncompliance with the Safety Act

34. No later than 5 working days after the execution of this Consent Order, RTDI shall submit to NHTSA a copy of its October 1, 2013 service bulletin, a Part 573 Report for the safety-related defect, and a report of a claim alleging that a death resulted from a safety defect related to the September 2015 crash involving deaths as referenced in Paragraph 20 above.

35. No later than 30 calendar days after the execution of the Consent Order, RTDI will send owners of the 57 Stretch Ducks formal customer notification as directed by 49 C.F.R. Part 577 and shall notify the owners that they are entitled to reimbursement for costs incurred in having remedied the vehicles or, in the case of the Seattle licensor, that a remedy remains available and that it is free of charge.

36. RTDI has consulted with NHTSA regarding which FMVSS applied to the vehicles when they were manufactured. RTDI acknowledges that NHTSA does not "approve" or endorse manufacturer certifications and that the duty to determine which FMVSS apply to RTDI's vehicles remains with RTDI. Not later than 60 calendar days after the appointment of the Consultant, as set forth below, RTDI will submit a FMVSS compliance plan to NHTSA. The plan will identify those FMVSS for which RTDI has made a good faith determination are applicable to the vehicles it has manufactured. For each such FMVSS, RTDI shall state when and how RTDI intends to bring the vehicles into compliance with a particular standard by following the statutory recall process or filing a petition for inconsequential noncompliance under 49 C.F.R. Part 556 or a petition for exemption under 49 C.F.R. Part 555. No later than 120 days after the submission of the compliance plan, RTDI will submit a confirmation to NHTSA affirming that all such vehicles owned or operated by RTDI or RTDI licensees obligated by

contract to perform repairs as directed by RTDI comply with all applicable FMVSS (other than those for which petitions for inconsequentiality or exemption have or are to be filed pursuant to RTDI's plan or are subject to ongoing design and/or engineering efforts which, subject to NHTSA's consent, require further extension of the 120 day deadline) and have been certified as such by the application of certification labels. If NHTSA should not grant any part of RTDI's inconsequentiality petition or exemption petition, the parties agree to consult in good faith with regard to determining next steps to address the issue.

37. RTDI shall submit all manufacturer identification information required by 49 C.F.R. Part 566 within 90 calendar days of the execution of this Consent Order.

38. RTDI shall submit VIN information required in 49 C.F.R. Part 565 within 90 calendar days of the execution of this Consent Order. If vehicles have been assigned VINs that are not in compliance with the requirements of 49 C.F.R. Part 565, RTDI will provide a detailed report to NHTSA no later than 90 days after the execution of this Consent Order, with each vehicle's assigned VIN and a description of why the VIN does not conform to the requirements of Part 565.

39. No later than 90 calendar days after the execution of this Consent Order, RTDI shall submit in accordance with 49 U.S.C. §30166(f) and 49 C.F.R. § 579.5 any notices, bulletins, and communications (collectively, "service bulletins") from the past five (5) years that would have been subject to 49 C.F.R. § 579.5, regardless of whether RTDI has already provided those service bulletins in response to NHTSA's Information Request. RTDI shall also include indexes for each document that was issued since October 1, 2012.

40. No later than 90 calendar days after the execution of this Consent Order, RTDI shall establish an early warning account with NHTSA. No later than 180 calendar days after execution of this Consent Order, RTDI shall submit any and all reports required by 49 C.F.R. § 579.27 for the five years preceding the aforementioned date of execution.

2. Retention of Outside Consultant

41. No later than 60 calendar days after the execution of this Consent Order, RTDI shall retain an outside consultant ("Consultant") with experience and expertise in motor vehicle safety and the requirements of the Safety Act and regulations thereunder. The Consultant position shall be held by a separate individual from the individual(s) representing RTDI in connection with this Consent Order. The Consultant shall advise and assist RTDI in developing a Compliance Plan and the Training Plan as referenced in Paragraphs 46 and 47. The Consultant shall review for sufficiency technical service bulletins ("TSBs"), other communications, and all reports required under the terms of the Consent Order, that RTDI is required to submit to NHTSA and/or owners during the term of the Consent Order. The Consultant shall advise and assist RTDI on all aspects of RTDI's compliance with the Safety Act and regulations thereunder.

42. Within 30 days calendar days after the execution of this Consent Order and prior to retaining the Consultant as referenced in Paragraph 41, RTDI shall submit the name and detailed resume of the individual whom RTDI intends to retain to NHTSA for approval, which will not be unreasonably withheld. RTDI agrees to ensure NHTSA has the ability to interview the individual prior to granting or denying approval. NHTSA will notify RTDI within 10 working days if it does not accept the proposed Consultant. RTDI will then have an additional 15 working days to submit a second proposed Consultant to NHTSA. The same procedures will apply to NHTSA's review of the name and resume of RTDI's subsequent proposed Consultant.

43. RTDI will report to NHTSA in writing when it has retained the Consultant, including the identity of the Consultant and the date upon which the individual was officially retained. RTDI shall retain the Consultant at its sole expense as needed during the term of the Consent Order.

3. General Performance Obligations

44. No later than 90 calendar days after the execution of this Consent Order, RTDI shall also submit a report to NHTSA, notifying the agency of all potential safety-related defects or noncompliances with applicable FMVSS that are currently under review by RTDI, for which notice has not previously been given to NHTSA.

45. No later than 30 calendar days after the execution of this Consent Order, RTDI shall perform an engineering analysis of the Stretch Duck axle to determine if the remedy included in the October 1, 2013 Service Bulletin is effective and report the results to NHTSA.

46. RTDI shall develop new written procedures for: (a) making safety-related defect and noncompliance determinations and notifying NHTSA of such safety-related defects or noncompliances with FMVSS in accordance with 49 C.F.R. Part 573; (b) notifying vehicle owners, licensees, and purchasers of safety-related defects and noncompliances in accordance with 49 C.F.R. Part 577; (c) reporting in compliance with those sections of 49 C.F.R. Part 579 applicable to RTDI; and (d) ensuring vehicles manufactured by RTDI in the future comply with applicable FMVSS and other statutory and regulatory requirements administered by NHTSA (collectively, "Compliance Plan"). If NHTSA reasonably determines that any changes to the written procedures are warranted, RTDI shall revise its written procedures to incorporate NHTSA's feedback. RTDI shall provide a revised copy of the Compliance Plan to NHTSA no later than 30 calendar days after receiving any such feedback from NHTSA. RTDI agrees that the Compliance Plan required in the Paragraph shall be publicly available.

47. RTDI shall train appropriate personnel on its Safety Act reporting requirements and Compliance Plan. RTDI's training shall be recurrent on at least an annual basis. No later than 120 calendar days after the execution date of this Consent Order, RTDI shall submit a report describing RTDI's training plan, including details on the subjects to be taught and individuals to

be trained (the "Training Plan"). NHTSA may, at its option, accept, reject or revise any part of the proposed Training Plan and may submit it back to RTDI for further revision, if necessary.

48. No later than 180 calendar days after the execution of this Consent Order, RTDI shall submit a report detailing its efforts to implement the Compliance Plan specified in Paragraph 46 and the Training Plan specified in Paragraph 47.

4. The Industry Outreach Performance Obligations

49. In addition to RTDI's performance obligations described above, this Consent Order requires RTDI to execute certain performance obligations directed at industry education and outreach, the objectives of which are to further the goals of the Safety Act, particularly with regard to educating manufacturers building vehicles using combinations of donor and new components to produce complete vehicles, including other amphibious vehicle manufacturers and small, independent manufacturers of heavy trucks, of their obligations under the Safety Act and regulations thereunder for reporting information to NHTSA, manufacturing vehicles that comply with applicable FMVSS, and making safety-related defect determinations. The industry outreach performance obligations will be satisfied through the activities as set forth in Paragraph 50 through 52 below.

50. The parties agree that RTDI will expend not less than $20,000 in execution of the industry outreach. Not less than 120 days after execution of this Consent Order, RTDI shall provide NHTSA with a plan for industry and consumer outreach, which NHTSA, at its option, may accept, reject, or revise and submit it back to RTDI for further revision, if necessary. The proposed plan shall include the following and which are to be completed over the next year:

a. Educate manufacturers building vehicles using combinations of donor and new components to produce complete vehicles, including other amphibious vehicle manufacturers and small, independent manufacturers of heavy trucks, on the importance of meeting their Safety Act obligations, such as early warning and

other reporting requirements under 49 C.F.R. Part 579 and recall requirements under 49 C.F.R. Parts 30118 through 30120 and 49 C.F.R. Parts 573 and 577.

b. Develop Safety Act educational materials for distribution to manufacturers.

c. Offer to assist other manufacturers and, if requested, help these manufacturers in developing their own safety outreach programs.

d. Educate licensees and other manufacturers on the importance of reporting potential defects directly to NHTSA, through VOQ complaints and otherwise.

e. Work with licensees to enhance recall effectiveness and mitigate the impact of recalls on consumers.

The outreach plan shall include metrics of success for the foregoing targeted performance obligations. The targeted performance obligations may be carried out, at RTDI's discretion, with the assistance and participation of other designers, engineers and manufacturers of amphibious vehicles, specialty vehicles, and tourism markets. At RTDI's discretion, the targeted performance obligations may also be carried out with the assistance and participation of industry trade associations. Any non-RTDI assistance and participation shall be done in a manner consistent with antitrust guidelines.

51. RTDI shall expend its best efforts to complete the targeted performance obligations not less than one year after NHTSA gives its approval of the industry outreach plan. No later than 360 calendar days after the execution of this Consent Order, RTDI will submit a report to NHTSA detailing the amount of dollars that RTDI actually expended during the prior year in furtherance of its obligations. In the event of a dispute as to whether RTDI has expended any part or all of twenty thousand dollars ($20,000), NHTSA shall advise RTDI of such in writing, to which RTDI shall have 15 working days to respond.

52. RTDI is responsible for the satisfactory completion of the targeted performance obligations described above. Subject to the provisions for extending the term of this Consent

Order in Paragraph 57, if RTDI has reasonably achieved all of the targeted performance obligations on or before 365 calendar days after the execution date of this Consent Order, RTDI will be released from any and all obligations to pay the Industry Outreach Amount, or any remaining portion thereof, to NHTSA. If, however, RTDI has not reasonably achieved the requirements of the performance obligations set out above by the end of the term of the Consent Order, the balance of the Industry Outreach amount shall become immediately due and owing. Should NHTSA extend the term of this Consent Order as set forth in Paragraph 57, RTDI's responsibility for the satisfactory completion of the targeted performance obligations shall also be extended for the term of one year.

5. Completion of Performance

53. RTDI will meet with NHTSA one year after the execution of the Consent Order to review the current status of RTDI's obligations under the Consent Order and to discuss any open items. Neither RTDI nor NHTSA anticipate open items as of that juncture, with the exception of the payment of the additional non-deferred payments as set forth above.

54. If there are unfulfilled items as of that meeting, RTDI will provide a plan for completing those items within a reasonable time, which is to be determined in consultation with NHTSA.

D. Compliance

55. RTDI shall comply with its obligations under the Safety Act and regulations thereunder to take all actions necessary to comply with this Consent Order and to cooperate with NHTSA in carrying out the requirements of this Consent Order. RTDI's reasonable best efforts shall include, but shall not be limited to: (i) providing prompt notice to NHTSA in the event any requirement of this Consent Order cannot be met or timely met, and (ii) ensuring that employees involved with implementation of the performance requirements of this Consent Order are kept well-informed and are allocated sufficient time during their working hours to enable them to

thoroughly and effectively perform actions to carry out or implement the performance requirements of this Consent Order.

56. RTDI shall provide written notice of each required submission under this Consent Order by electronic mail to NHTSA's Medium & Heavy Duty Vehicle Division Chief (currently Bruce York, Bruce.York@dot.gov), and with copies to NHTSA's Associate Administrator for Enforcement (currently Jeffrey Giuseppe, Jeffrey.Giuseppe@dot.gov) and NHTSA's Assistant Chief Counsel for Litigation and Enforcement (currently Kerry Kolodziej, Kerry.Kolodziej@dot.gov).

III. TERM OF CONSENT ORDER

57. Unless otherwise specified, the term of this Consent Order and RTDI's performance obligations thereunder is one year from the date of execution, provided, however, that the commitments in Paragraph 28 and Paragraphs 34 through 54 shall survive the term of this Consent Order until the Non-Deferred Amount is paid in full and the performance obligations with respect to the Deferred Amount and Industry Outreach Amount are reasonably satisfied. NHTSA may, at its option, extend the period for one year.

IV. AMENDMENT

58. This Consent Order cannot be modified, amended, or waived except by an instrument in writing signed by all parties, and no provision may be modified, amended, or waived other than by a writing setting forth such modification, amendment, or waiver and signed by the party making the modification, amendment, or waiver.

V. MISCELLANEOUS

59. Nothing in this Consent Order shall be interpreted or construed in a manner inconsistent with, or contravening, any federal law, rule, or regulation at the time of the execution of this Consent Order, or as amended thereafter.

60. Upon receipt of the Non-Deferred Amount set forth in Paragraphs 27 and 28, and NHTSA's determination that RTDI has reasonably achieved all of the performance obligations, set forth in Paragraphs 34 through 54, at a date agreed upon by the parties, but at no time before the first anniversary of this Consent Order, RTDI, including its current and former directors, officers, employees, agents, parents, subsidiaries, affiliates, successors, and assigns will be released from liability for civil penalties pursuant to 49 U.S.C. § 30165 in connection with any and all violations of RTDI's Safety Act reporting obligations, including those expressly identified in this Consent Order, from the inception of the Safety Act through the execution date of this Consent Order. Additionally, the Secretary of Transportation, by and through the Administrator of NHTSA, hereby waives any and all enforcement action or claims against RTDI (including its current and former directors, officers, employees, agents, parents, subsidiaries, affiliates, successors, and assigns) for civil penalties solely with respect to potential violations of the Safety Act or its implementing regulations that are disclosed pursuant to the Terms and Conditions of the Consent Order included in Paragraph 39, and subject to RTDI's satisfactory fulfillment of its other obligations under this Consent Order. Should RTDI fail to satisfactorily disclose the service bulletins, incidents involving death, or safety-related defects it is required to report under Paragraph 39, NHTSA may pursue any and all enforcement action or claims for civil penalties with respect to potential violations of the Safety Act or its implementing regulations that are disclosed.

61. This Consent Order does not release RTDI from civil or criminal liabilities, if any, that may be asserted by the United States, the Department of Transportation, NHTSA, or any other governmental entity, other than its civil penalty liabilities under 49 U.S.C. §§ 30165 and 30166 as described in this Consent Order.

62. None of the specific reporting obligations described in this Consent Order relieve RTDI of its obligation to submit any other reports required by the Safety Act or its corresponding regulations.

63. The parties shall each bear their own respective attorneys' fees, costs, and expenses, except as provided in Paragraph 31 above.

64. This Consent Order shall be effective following its execution. Any breach of the obligations under this Consent Order may, at NHTSA's option, be immediately enforceable in any United States District Court. RTDI agrees that it will not raise any objection as to venue.

65. In the event of RTDI's breach of, or failure to perform, any term of this Consent Order NHTSA reserves the right to pursue any and all appropriate administrative and/or judicial remedies, including, but not limited to, assessing interest for untimely payments and/or commencing litigation to enforce this Consent Order in any United States District Court.

66. The parties who are the signatories to this Consent Order have the legal authority to enter into this Consent Order, and each party has authorized its undersigned to execute this Consent Order on its behalf.

67. RTDI expressly waives any and all defenses and agrees not to plead, argue, or otherwise raise any defenses other than (i) that the payment of the Non-Deferred Amount, set forth in Paragraphs 27 and 28, was made to NHTSA, if applicable, and (ii) that RTDI has substantially complied with the terms of this Consent Order.

68. This Consent Order shall be binding upon, and inure to the benefit of, RTDI and its current and former directors, officers, employees, agents, parents, subsidiaries, affiliates, successors, and assigns. RTDI agrees to waive any and all defenses that may exist or arise in connection with any person or entity succeeding to the interests or obligations herein, including as a result of any changes to the corporate structure or relationships among or between RTDI and any of its parents, subsidiaries, or affiliates.

69. Should any condition or other provision contained herein be held invalid, void, or illegal by any court of competent jurisdiction, it shall be deemed severable from the remainder of this Consent Order and shall in no way affect, impair, or invalidate any other provision of this Consent Order.

70. This Consent Order shall not be construed to create rights in, or grant any cause of action to, any third party not party to this Consent Order.

71. This Consent Order may be executed in counterparts, each of which shall be considered effective as an original signature.

72. This Consent Order is a fully integrated agreement and shall in all respects be interpreted, enforced, and governed under the federal law of the United States. This Consent Order which are fully incorporated by reference, sets forth the entire agreement between the parties with regard to the subject matter hereof. There are no promises, agreements, or conditions, express or implied, other than those set forth in this Consent Order.

APPROVED AND SO ORDERED:

NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION,
U.S. DEPARTMENT OF TRANSPORTATION

Dated: November 15, 2016

By: **// ORIGINAL SIGNED BY //**

Mark R. Rosekind, Ph.D.
Administrator

Dated: November 15, 2016

By: _____

Paul A. Hemmersbaugh
Chief Counsel

Dated: November 15, 2016

By: _____

Kerry E. Kolodziej
Acting Assistant Chief Counsel
for Litigation and Enforcement

Dated: November 15, 2016

By: _____

Otto G. Matheke, III
Senior Trial Attorney

Dated: November 15, 2016

By: _____

Sarah E. Sorg
Senior Trial Attorney

Dated: November 15, 2016

By: _____

Jordan E. Stephens
Trial Attorney

AGREED:

RIDE THE DUCKS INTERNATIONAL, LLC

Dated: __, 2016 11 / 15 / 2016

By: _____

Chris Herschend
President

Dated: __, 2016 11/15/2016

By: _____

Robby Hultz
Managing Partner

Dated: __, 2016

By: _____

Jacqueline S. Glassman
King & Spalding
Counsel for Ride the Ducks International, LLC

AGREED:

RIDE THE DUCKS INTERNATIONAL, LLC

Dated: __, 2016

By: _____

Chris Herschend
President

Dated: __, 2016

By: _____

Robby Hultz
Managing Partner

November
Dated: 15, 2016

By: _____

Jacqueline S. Glassman
King & Spalding
Counsel for Ride the Ducks International, LLC

Exhibit 3

IMPORTANT SAFETY RECALL

NHTSA Recall: 16V-859
12/14/2016

This notice applies to your vehicle, Duck No. SD-36, SD-37, SD-39, SD-40, SD-41, SD-42, SD-43, SD-45, SD-47, SD-50

Dear RTDI Stretch Duck Operator:

This notice is sent to you in accordance with the National Traffic and Motor Vehicle Safety Act.

Ride the Ducks International (RTDI) has decided that a defect relating to motor vehicle safety exists or existed in certain "Stretch" Amphibious Passenger Vehicles ("Stretch Ducks"). As a result, RTDI is conducting a safety recall.

RTDI is conducting a recall because of the possibility that over time the axle housing can fracture at the connection point between the knuckle ball and the housing due to excessive fatigue. If the axle housing fractures, this condition could cause a driver to lose control of the vehicle, increasing the risk of a crash.

In October 2013, RTDI issued a Service Bulletin (SB-00-14-13) instructing vehicle operators and licensees to repair and reinforce the connection where the knuckle housing ball connects to the axle housing. If you have already performed this repair on your vehicles, you are entitled to reimbursement for the costs associated with having done so. If you have not yet performed this repair on your vehicles, you must do so expeditiously and the service will be performed for you at **no charge.**

Pursuant to a recent agreement with the National Highway Traffic Safety Administration, RTDI is conducting an independent engineering analysis of the repair procedures in SB-00-14-13. If any further action is required, we will notify you promptly.

If after contacting RTDI, you are not satisfied we have done our best to remedy this condition without charge and within a reasonable time, you may wish to write to the following:

Administrator
National Highway Traffic Safety Administration,
1200 New Jersey Avenue, SE.,
Washington, DC 20590

You may also call the toll-free Vehicle Safety Hotline at 1.888.327.4236 (TTY 1.800.424.9153), or go to http://www.safercar.gov.

The National Highway Traffic Safety Administration Campaign ID Number for this recall is 16V-859.

Exhibit 4

IMPORTANT SAFETY RECALL

NHTSA Recall: 17V-501

9-26-17

This notice applies to your vehicle, Duck No. SD-36 VIN: 1R9RS0AH64B834S36, SD-37 VIN: 1R9RS0AH84B834S37, SD-39 VIN: 1R9RS0AH14B834S39, SD-40 VIN: 1R9RS0AH84B834S40, SD-41 VIN: 1R9RS0AHX4B834S41, SD-42 VIN: 1R9RS0AH14B834S42, SD-43 VIN: 1R9RS0AH34B834S43, SD-45 VIN: 1R9RS0AH74B834S45, SD-47 VIN: 1R9RS0AH95B834S47, SD-50 VIN: 1R9RS0AH95B834S50

Dear RTDI Stretch Duck Operator:

This notice is sent to you in accordance with the National Traffic and Motor Vehicle Safety Act.

Ride The Ducks International (RTDI) has decided that a defect relating to motor vehicle safety exists or existed in certain "Stretch" Amphibious Passenger Vehicles ("Stretch Ducks"). As a result, RTDI is conducting a safety recall.

RTDI is conducting a recall because of the possibility that over time the axle housing can fracture at the connection point between the knuckle ball and the housing due to excessive fatigue. If the axle housing fractures, this condition could cause a driver to lose control of the vehicle, increasing the risk of a crash.

RTDI previously sent notifications to affected owners about this issue in December 2016. Since then, RTDI conducted an independent engineering analysis of the repair procedure outlined in SB-00-14-13. Following the results of that analysis, RTDI has changed the remedy to ensure that it is sufficiently robust. Under the revised remedy, RTDI will replace each of the front axles with one that has a coupler welded to the axle. Prior to the installation of the coupler, the axles will undergo magna particle testing. The axles will also be inspected on an annual basis. If you have already performed this repair on your vehicles, you are entitled to reimbursement for the costs associated with having done so. If you have not yet performed this repair on your vehicles, you must do so expeditiously and the service will be performed for you at **no charge.**

If after contacting RTDI, you are not satisfied we have done our best to remedy this condition without charge and within a reasonable time, you may wish to write to the following:

Administrator
National Highway Traffic Safety Administration,
1200 New Jersey Avenue, SE.,
Washington, DC 20590

You may also call the toll-free Vehicle Safety Hotline at 1.888.327.4236 (TTY 1.800.424.9153), or go to http://www.safercar.gov.

The National Highway Traffic Safety Administration Campaign ID Number for this recall is 17V-501

Exhibit 5

Part 573 Safety Recall Report 16V-859

Manufacturer Name : Ride The Ducks International LLC
Submission Date : NOV 22, 2016
NHTSA Recall No. : 16V-859
Manufacturer Recall No. : NR

Manufacturer Information :

Manufacturer Name : Ride The Ducks International LLC
Address : 2320 W Highway 76
PO BOX 1837 BRANSON MO 65616
Company phone : 417 266 7600

Population :

Number of potentially involved : 57
Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 1996-2005 RTDI "Stretch" Amphibious Passenger Vehicles
Vehicle Type :
Body Style :
Power Train : NR
Descriptive Information : Amphibious Passenger Vehicle
Production Dates : JAN 01, 1996 - DEC 31, 2005
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Description of Defect :

Description of the Defect : The axle housing can fracture at the connection point between the knuckle ball and the housing due to excessive fatigue.
FMVSS 1 : NR
FMVSS 2 : NR
Description of the Safety Risk : If the axle housing fractures, the driver may lose control of the vehicle and increase the risk of a crash.
Description of the Cause : The axle housing can fracture due to excessive fatigue.
Identification of Any Warning that can Occur : NR

Supplier Identification :

Component Manufacturer

Name :	NR
Address :	NR
	NR
Country :	NR

Chronology :

See attached document

Description of Remedy :

Description of Remedy Program :	The remedy program applied was set forth in the Service Bulletin issued on October 1, 2013. The remedy involved strengthening the connection where the knuckle housing ball connects to the axle housing.
How Remedy Component Differs from Recalled Component :	NR
Identify How/When Recall Condition was Corrected in Production :	RTDI is not currently building or having built new amphibious passenger vehicles.

Recall Schedule :

Description of Recall Schedule :	RTDI will send formal customer notification letters to its company-owned operators and licensors as set forth in the Consent Order with NHTSA. To the extent that Ride the Ducks Seattle requests parts to conduct the repair, they are available. Ride the Ducks International will offer reimbursement to any licensor that has already conducted the repairs.
Planned Dealer Notification Date :	NR - NR
Planned Owner Notification Date :	NR - NR

* NR - Not Reported

Exhibit 6

Part 573 Safety Recall Report 16V-859

Manufacturer Name : Ride The Ducks International LLC
Submission Date : MAY 04, 2017
NHTSA Recall No. : 16V-859
Manufacturer Recall No. : NR

Manufacturer Information :

Manufacturer Name : Ride The Ducks International LLC
Address : 2320 W Highway 76
PO BOX 1837 BRANSON MO 65616
Company phone : 417 266 7600

Population :

Number of potentially involved : 57
Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 1996-2005 RTDI "Stretch" Amphibious Passenger Vehicles
Vehicle Type :
Body Style :
Power Train : NR
Descriptive Information : Amphibious Passenger Vehicle
Production Dates : JAN 01, 1996 - DEC 31, 2005
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Description of Defect :

Description of the Defect : The axle housing can fracture at the connection point between the knuckle ball and the housing due to excessive fatigue.
FMVSS 1 : NR
FMVSS 2 : NR
Description of the Safety Risk : If the axle housing fractures, the driver may lose control of the vehicle and increase the risk of a crash.
Description of the Cause : The axle housing can fracture due to excessive fatigue.
Identification of Any Warning that can Occur : NR

Supplier Identification :

Component Manufacturer

Name : NR
Address : NR
NR
Country : NR

Chronology :

See attached document amending chronology

Description of Remedy :

Description of Remedy Program :	RTDI will replace each of the front axles with one that has a coupler welded to the axle. Prior to the installation of the coupler, the axles will undergo magna particle testing. The axles will also be inspected on an annual basis.
How Remedy Component Differs from Recalled Component :	NR
Identify How/When Recall Condition was Corrected in Production :	RTDI is not currently building or having built new amphibious passenger vehicles.

Recall Schedule :

Description of Recall Schedule :	RTDI will send formal customer notification letters to its company-owned operators and licensors as set forth in the Consent Order with NHTSA. Ride the Ducks International will offer reimbursement to any licensor that has already conducted the repairs.
Planned Dealer Notification Date :	NR - NR
Planned Owner Notification Date :	NR - NR

* NR - Not Reported

Exhibit 7

Part 573 Safety Recall Report 17V-501

Manufacturer Name : Ride The Ducks International LLC
Submission Date : AUG 11, 2017
NHTSA Recall No. : 17V-501
Manufacturer Recall No. : NR

Manufacturer Information :

Manufacturer Name : Ride The Ducks International LLC
Address : 2320 W Highway 76
PO BOX 1837 BRANSON MO 65616
Company phone : 417 266 7600

Population :

Number of potentially involved : 57
Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 1996-2005 RTDI Stretch Amphibious Passenger Vehicles
Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES
Body Style : OTHER
Power Train : NR
Descriptive Information : Amphibious Passenger Vehicle
Production Dates : JAN 01, 1996 - DEC 31, 2005
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Description of Defect :

Description of the Defect : The axle housing can fracture at the connection point between the knuckle ball and the housing due to excessive fatigue.
FMVSS 1 : NR
FMVSS 2 : NR
Description of the Safety Risk : The axle housing can fracture at the connection point between the knuckle ball and the housing due to excessive fatigue.
Description of the Cause : The axle housing can fracture due to excessive fatigue.
Identification of Any Warning that can Occur : NR

Supplier Identification :

Component Manufacturer

Name : NR
Address : NR

	NR
Country :	NR

Chronology :

Chronology Uploaded as Miscellaneous Document

Description of Remedy :

Description of Remedy Program :	RTDI will replace each of the front axles with one that has a coupler welded to the axle. Prior to the installation of the coupler, the axles will undergo magna particle testing. The axles will also be inspected on an annual basis.
How Remedy Component Differs from Recalled Component :	Vehicles will be provided new axles with a coupler welded to the axle.
Identify How/When Recall Condition was Corrected in Production :	RTDI is not currently building or having built new amphibious passenger vehicles.

Recall Schedule :

Description of Recall Schedule :	RTDI previously notified owners under recall 16V-859. RTDI will reissue owner notification letters once NHTSA issues a new recall number and approves the draft letter.
Planned Dealer Notification Date :	NR - NR
Planned Owner Notification Date :	NR - NR

* NR - Not Reported

Exhibit 8

Service Date July 25, 2017

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, Complainant, v. RIDE THE DUCKS OF SEATTLE, L.L.C. d/b/a SEATTLE DUCK TOURS, Respondent.	DOCKET TE-151906 ORDER 09 ORDER DENYING PETITION TO LIFT SUSPENSION ON USE OF "STRETCH DUCKS"

BACKGROUND

1 On September 24, 2015, an incident occurred on the Aurora Bridge in Seattle involving a Ride the Ducks of Seattle, LLC d/b/a Seattle Duck Tours (Ride the Ducks or Company) vehicle that resulted in the tragic deaths of five people and serious injuries to many others. On September 28, 2015, the Washington Utilities and Transportation Commission (Commission) conducted emergency adjudicative proceedings pursuant to RCW 34.05.479 and entered Order 01, Notice of Emergency Adjudication and Order Suspending Certificate (Order 01). Order 01 suspended Certificate No. ES-00146 to operate and provide excursion services (Certificate) held by Ride the Ducks pending the results of a Commission staff (Staff) investigation and inspection of Ride the Ducks' entire fleet of vehicles, drivers, and operations.

2 On December 22, 2015, the Commission entered Order 05, which among other things, lifted the suspension of Certificate No. ES-00146 to operate and provide excursion services held by Ride the Ducks using its "Truck Duck" vehicles, but continued the suspension on its "Stretch Duck" vehicles "unless and until the Company demonstrates to

the Commission's satisfaction that those vehicles do not pose an immediate danger to public safety."[1]

3 On July 12, 2017, Ride the Ducks filed with the Commission a petition requesting to reinstate the Company's authority to provide excursion services using its Stretch Duck vehicles (Petition). The Petition claims that the manufacturer of the Stretch Ducks, Ride the Ducks International (RTDI), issued a recall for the front axle safety defect, as required by the National Highway Traffic Safety Administration, and will arrange to replace each of the front axles with one that has a coupler welded to the axle. The Petition further claims that RTDI notified Ride the Ducks that it will receive new axles compliant with the recall on or around July 12, 2017, that Ride the Ducks intends to install and maintain the axles to the requirements set by the safety recall, and that this demonstrates that the vehicles do not pose an immediate danger to public safety.

4 On July 21, 2017, Staff submitted its response to the Petition (Staff Response). Staff opposes the request to lift the suspension on the use of Stretch Duck vehicles as premature. Staff states that it would support the Company's requested relief if Ride the Ducks were to:

- Provide verification through a qualified third party, to the satisfaction of the Commission, that the new axle installation in each Stretch Duck vehicle meets or exceeds the applicable federal motor vehicle safety standards.

- Perform an annual inspection in accordance with 49 CFR 396.17 and correct any defects discovered during the inspections.[2]

Staff also "proposes to conduct a jurisdictionally mandated Level VII commercial vehicle inspection on each Stretch Duck vehicle the Company proposes to operate."[3]

5 On July 21, 2017, the Public Counsel Unit of the Washington Attorney General's Office (Public Counsel) submitted its response to the Petition (Public Counsel Response). Public

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[1] Order 05 ¶ 24.

[2] Staff Response at 2.

[3] *Id*.

Counsel states that it did not receive a copy of the Petition,[4] but based on the summary in the Commission's Notice of Opportunity to Respond, Public Counsel also opposes the Petition. According to Public Counsel, "The Company's intentions, while the first step in reinstating their certificate to operate, does not meet the Commission's requirement that the Company demonstrate that the vehicles pose no danger to public safety."[5] Public Counsel concurs with all the recommendations Staff made in its response.

DISCUSSION AND DECISION

6 The Commission acknowledges the efforts Ride the Ducks has made to improve the safety of its Stretch Duck vehicles. We nevertheless agree with Staff and Public Counsel that those steps are not sufficient to demonstrate to the Commission's satisfaction that those vehicles do not pose an immediate danger to public safety. Promises of actions to be taken in the future do not ensure that the vehicles currently are safe to operate. Accordingly, we deny the Petition.

7 Our denial, however, is without prejudice to the Company to submit a subsequent request to lift the suspension if and when the Stretch Ducks comply with all applicable safety standards. To that end, we adopt Staff's recommendations and require any future petition, at a minimum, (1) to demonstrate that the Company has satisfied the requirements Staff proposes, and (2) to be submitted to the Commission and served in compliance with WAC 480-07-360 and Order 07, Prehearing Conference Order.

ORDER

THE COMMISSION ORDERS:

8 (1) The Petition of Ride the Ducks of Seattle, LLC d/b/a Seattle Duck Tours to lift the suspension on its authority to provide excursion services using its Stretch Duck vehicles is DENIED without prejudice.

9 (2) Any future petition Ride the Ducks of Seattle, LLC d/b/a Seattle Duck Tours files to lift the suspension on its authority to provide excursion services using its

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[4] Public Counsel Response ¶ 1, n.1. We note that only Public Counsel submitted a certificate of service with its pleading as required in WAC 480-07-360, and no party copied the presiding administrative law judge on its electronic service as required in Order 07, Prehearing Conference Order, in this docket.

[5] *Id.* ¶ 3.

Stretch Duck vehicles, at a minimum, must demonstrate that the Company has satisfied the requirements in paragraph 4 above and must be filed and served in compliance with all applicable procedural requirements.

DATED at Olympia, Washington and effective July 25, 2017.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

ANN E. RENDAHL, Commissioner

JAY M. BALASBAS, Commissioner

Exhibit 9

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-11-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS16
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-11-17
John Frans	Level II	John Frans	1-11-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-11-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS17
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-11-17
John Frans	Level II	John Frans	1-11-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-11-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS18
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-11-17
John Frans	Level II	John Frans	1-11-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-11-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS19
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-11-17
John Frans	Level II	John Frans	1-11-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-12-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS20
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-11-17
John Frans	Level II	John Frans	1-11-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-11-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS21
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-11-17
John Frans	Level II	John Frans	1-11-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-11-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS22
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-11-17
John Frans	Level II	John Frans	1-11-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-11-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS23
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-11-17
John Frans	Level II	John Frans	1-11-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	1-12-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag#SDS24
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Branson, MO

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Machine Marks Polished
Front Left Axle	X				Machine Marks Polished

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	1-12-17
John Frans	Level II	John Frans	1-12-17

Exhibit 10

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-30-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS16
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson - shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-30-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS17
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-30-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS18
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-29-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS19
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17
John Frans	Level II	John Frans	6-29-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-30-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS20
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-29-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS21
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17
John Frans	Level II	John Frans	6-29-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-29-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS22
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17
John Frans	Level II	John Frans	6-29-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-29-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS23
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17
John Frans	Level II	John Frans	6-29-17

MAGNETIC PARTICLE EXAMINATION REPORT

COMPANY:	RIDE THE DUCKS INTERNATIONAL	**DATE:**	6-29-17
STREET ADDRESS:	2320 WEST HIGHWAY 76	**COMPONENT:**	Front Axle Collar
CITY, STATE:	Branson, MO 65616	**DUCK ID or Tag #:**	Tag #SDS24
CONTACT PERSON:	Frank English - Director of Safety	**REPORT NO.:**	#1
TELEPHONE:	417-266-7600	**DUCK LOCATION:**	Tested in Branson shipped to Seattle

MATERIAL IDENTIFICATION	**EQUIPMENT MANUFACTURER**	**ACCEPTANCE CRITERIA**
Carbon steel	Parker	No relevant Linear Indications
METHOD	**EQUIPMENT MODEL/SERIAL NO.**	**PROCEDURE NO.**
Direct yoke	DA400 / 24892	MT-103
CURRENT	**PARTICLE TYPE/COLOR**	**STANDARD/CODE**
AC	Fluorescent	ASTM E-709
LEG SPACING	**MAGNETIZING TECHNIQUE**	**DEMAGNETIZATION**
4" - 6"	Continuos	Yes - 2G

PART #/LOCATION	ACCEPT	REJECT	DISCONTINUITY	SIZE	COMMENTS
Front Right Axle	X				Weld reinforcement polished to ⅛"
Front Left Axle	X				Weld reinforcement polished to ⅛"

INSPECTION TECHNICIAN (S)	QUALIFICATION/CERTIFICATION	SIGNATURE	DATE
Frank English	Level II	Frank English	6-29-17
John Frans	Level II	John Frans	6-29-17

Exhibit 11

Recreation Engineering, Inc.

300 N. Lynx Creek Rd., Prescott, AZ 86303
Tel (928) 778-6211 Fax (928) 778-6212

RECREATION SAFETY AND ENGINEERING CONSULTANTS
BRIAN D. KING, P.E. / Professional Mechanical Engineer, IL, FL, NV; NDT Level II, CMT II, COT II, CRI, NAARSO III, QSI
JEFFERY W. ABENDSHIEN / ASNT NDT Level III, CMT II, COT II, CAOT, PRI, NAARSO III, QSI
BARTHOLOMEW J. MUELLER / NDT Level II, CMT II, CAOT, CRI, NAARSO II, ETCP-RT, QSI
KEVIN D. GARRISON / CWI, NDT Level II, CMT II, CAOT, PRI, NAARSO III, QSI
MARY JANE BREWER / CPO, AFO, COT, CAOT, NAARSO II, QSI
JONATHAN D. HINDS / Mechanical Engineer
JESSE MONREAL / Industrial Engineer, CMT I, NAARSO I
JAN A. KING / AB, Director of Administrative Services

Web Site: www.RecreationEngineering.com

Mechanical Analysis and Design
Maintenance and Safety Audits
Mechanical Testing and Dynamic Analysis
Maintenance and Safety Program Development
CA QSI Inspection
Incident Investigation
Non-Destructive Testing

Writer's e-mail:
Abendshien@RecreationEngineering.com

April 28, 2018

Ryan Johnson
Director of Operations
Ryan@ridetheducksofseattle.com
Cell: (206)-571-3045

Re: REI Third Party Inspection of Duck #19 Axle Housing and Related Components

Mr. Johnson:

Recreation Engineering, Inc., has inspected the installation of the front axle housing and related components (steering, suspension and brakes) on Duck #19. The inspection was performed by Jeffery W. Abendshien.

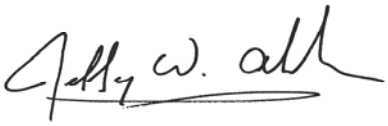
The scope of service was as follows:

Safety inspection to Ride the Duck International specifications and applicable Federal Motor Vehicle Safety Standards in Title 49, Part 570 "Vehicle In Use Inspection Standards" as mentioned below.

Based upon the aforementioned, the Duck #19 front axle housing and related components were inspected, tested, evaluated, and found to be in substantial compliance with the manufacturer specifications and applicable Federal Motor Vehicle Safety Standards, specifically Title 49, Part 570, Sub-Part B, Sections 570.59 (Service Brake System), 570.60 (Steering System), 570.61 (Suspension System), 570.62 (Tires) and 570.63 (Wheels). Note: Due to the movement restriction placed on the Stretch Ducks the road test specified in Section 570.59 (Service Brake System Stop Test) could not be performed. This test can be easily performed and verified by Ride the Duck maintenance personnel when the Duck is placed back in service.

If I can be of any further service, please do not hesitate to contact my office.

Sincerely,



Jeffery W. Abendshien, ASNT NDT Level III / NAARSO Level III / AIMS Level III
Vice-President

Jeffery W. Abendshien is the vice-president of Recreation Engineering, Inc. He attended The Ohio State University (College of Engineering) and maintains an ASNT NDT Level III certification in multiple disciplines. His continuing education and teaching experience includes hundreds of additional credit hours of work from Old Dominion University and Greenville Technical College where he taught specialized safety, inspection and testing courses. His personal inspection and testing experience includes many unique code specific and niche transportation industries such as amusement rides and attractions (NAARSO and AIMS Level III Senior inspector), marine passenger vessels including ferries, water taxis and large (1000 ton+) excursion vessels, amphibious passenger vehicles (including commercial and military "Ducks" and DUKW vehicles), marine racing vessels (APBA certified inspector), track racing vehicles (NHRA and IHRA certified inspector), off-road racing vehicles in the SCORE and Best in the Desert series (as part of the BF Goodrich racing team), commercial passenger vehicles including historical trolleys (San Francisco) and standard vehicles such as buses and trams. Additional experience includes aerial tramways, scenic railroads, theatrical rigging, rope access inspections and underwater NDT (commercial diver for marine vessels, submarines and fixed structures).

Mr. Abendshien is an active member in the ASTM International Committee which is responsible for writing and maintaining globally recognized standards and an active member of the American Society for Non-Destructive Testing organization which is responsible for maintaining the qualification/certification of inspection and testing personnel. He is currently Vice-Chairman of the ASTM F-24.60 committee for Special Rides and Attractions. Mr. Abendshien has also written inspection and audit procedures, maintenance procedures, OEM manuals and operational procedures for many specialty rides and attractions.

Mr. Abendshien is an AIMS International Certified Professional Ride Inspector (Level III) and is listed by Clark County, Nevada as an Amusement Ride Quality Assurance Inspector. He is a Level III (Senior) Certified Amusement Ride Safety Inspector and Certified Operations Level I by the National Association of Amusement Ride Safety Officials. He is also an AIMS Certified Maintenance Technician (Level II), AIMS Certified Operations Technician (Level II) and AIMS Certified Aquatics (Level I).

Mr. Abendshien is recognized by the State of California as a Permanent Amusement Ride Qualified Safety Inspector, as a Missouri State Authorized Amusement Ride Inspector, State of Texas recognized Ride Inspector and is a Florida State Authorized Amusement Devices and Amusement Attractions Inspector. He has prepared and presented curriculum at annual AIMS International safety seminars and was presented the 1998 and 2010 AIMS Safety Seminar Harold Chance Award for best presentation. Mr. Abendshien has also presented at annual National Association of Amusement Ride Safety Officials safety seminars and International Code Council Educode seminars. He has also prepared and presented many private lectures and training to government officials and individual clients.

Mr. Abendshien has been a member of the American Society of Mechanical Engineers, American Society for Non-Destructive Testing, American Welding Society, International Association of Amusement Parks and Attractions, the American Society for Testing and Materials International, Amusement Industry Manufacturers and Suppliers International, National Association of Amusement Ride Safety Officials, Association for Challenge Course Technology, Professional Ropes Course Association and the United States Institute for Theater Technology.

Mr. Abendshien continues to participate in, and over-see, onsite safety inspections globally.

Exhibit 12

ANNUAL VEHICLE INSPECTION REPORT

Unit No. 19	Vin No.	Make GMC	Model DUKW	License No. B72766Z
Motor Carrier Ride the Ducks of Seattle		Inspection Location 4203 9th Ave. NW, Seattle WA, 98109		
Motor Carrier's Address 516 Broad St. Seattle, WA 98109		Inspection Date 6/22/18		Odometer Reading 57874

(Inspector must complete both sides of this form)

COMPONENTS INSPECTED

ITEM	Pass	Defect
1 BRAKES		
a. Service brakes	✓	○
b. Parking brake system		
i. Push rod travel	✓	○
ii. Lining thickness	✓	○
c. Brake drums or rotors	✓	○
d. Brake hoses	✓	○
e. Brake tubing	✓	○
f. Low pressure warning device	✓	○
g. Tractor protection valve N/A	○	○
h. Air compressor N/A	○	○
i. Electric brakes	✓	○
j. Hydraulic brakes	✓	○
k. Vacuum system N/A	○	○
2 COUPLING DEVICES		
a. Fifth wheel N/A	○	○
b. Pintle hook N/A	○	○
c. Safety devices N/A	○	○
3 EXHAUST SYSTEM		
a. Any exhaust system determined to be leaking at a point forward of or directly below the driver/sleeper compartment	✓	○
b. No part of the exhaust system shall be so located as would likely result in burning, charring, or damaging the electrical wiring, the fuel supply, or any combustible part of the motor vehicle	✓	○
4 FRAME		
a. Frame members	✓	○
b. Tire and wheel clearance	✓	○
5 FUEL SYSTEMS AND LINES		
a. Visible leaks	✓	○
b. Fuel tank filler caps	✓	○
c. Fuel tank security	✓	○
6 LIGHTS AND REFLECTORS		
a. Turn signals and lenses	✓	○
b. 4-way emergency flashers	✓	○
c. Headlights	✓	○
d. Clearance lights	✓	○
e. Stop and tail lights and lenses	✓	○
f. Reflectors	✓	○

ITEM	Pass	Defect
7 SAFE LOADING		
a. Protection against shifting cargo	✓	○
b. Part(s) of vehicle or condition of loading area such that the spare tire or any part of the load or equipment can fall into the roadway	✓	○
8 STEERING MECHANISM		
a. Steering wheel play	✓	○
b. Steering column	✓	○
c. Front axle beam and all steering components other than a steering column	✓	○
d. Steering gear box	✓	○
e. Pitman arm	✓	○
f. Power steering	✓	○
g. Ball and socket joints	✓	○
h. Tie rods and drag links	✓	○
i. Nuts	✓	○
j. Steering column	✓	○
9 SUSPENSION		
a. Any u-bolt(s), spring hanger(s), or other axle positioning part(s) cracked, broken, loose, or missing resulting in shifting of an axle from its normal position	✓	○
b. Spring assembly	✓	○
c. Torque, radius, or tracking components	✓	○
10 TIRES		
a. Cuts or blemishes	✓	○
b. Tread depth	✓	○
11 VANS AND OPEN-TOP TRAILER BODIES		
a. Upper rail N/A	○	○
b. Lower rail N/A	○	○
c. Floor cross members N/A	○	○
d. Side panels N/A	○	○
12 WHEELS AND RIMS		
a. Lock or side ring N/A	○	○
b. Wheels and rims	✓	○
c. Fastners	✓	○
d. Welds	✓	○
13 WINDSHIELD WIPERS	✓	○
14 EMERGENDY EXITS ON BUSES	✓	○

Inspector's Comments:

INSPECTOR'S QUALIFICATIONS

I, Isaac Hoffman, am qualified to perform an annual inspection pursuant to Part 396.19 for the following reasons.

1 I have successfully complete a state or federally-sponsored program

2 I have at least one year of training and/or experience in the following:

a. Participation in a truck operation and maintenance-training program.

b. Experience as a mechanic or inspector in a motor carrier maintenance program.

c. Experience as a mechanic or inspector in truck maintenance at a commercial garage, leasing company, or similar facility.

d. Experience as a commercial vehicle inspector for a state, provincial, or federal government.

INSPECTOR'S CERTIFICATION

I hereby certify that I have been issued a copy of Appendix G or 49 CFR, Part 396, and that the annual inspection I have performed is accurate and complete, pursuant to the inspection criteria set forth therein.

Signature _____ Date 6/22/18

Exhibit 13

Non-Destructive Testing Criteria

NDT Inspection Procedures

RTD Seattle Fleet Operations

Memorandum for Record **January 17th 2017**

To: MISTRAS Group Inc.
From: Joe M. Hatten, Maintenance Manager, Ride the Ducks of Seattle
Subject: NDT Standard Operating Procedures

Purpose:

This document provides testing criteria for the Non-Destructive Testing of Truck Duck steer axles, steer axle spindles, and drive axles owned by Ride the Ducks of Seattle. A copy of this document shall be provided to the testing agency contracted to perform the Non-Destructive Testing. The original version of this SOP will be maintained by the Maintenance Manager for Ride the Ducks of Seattle.

Overview:

Ride the Ducks of Seattle is committed to providing the safest amphibious tours in the country. This commitment requires verification that current equipment and replacement parts are in proper operating condition at all times. To ensure this commitment is met, Ride the Ducks of Seattle has enlisted the service of Mistras Group Inc. to provide Non-Destructive Testing of several suspension and drivetrain components. The purpose for this memorandum packet is to establish parameters for quality testing of the vehicles as specified herein utilizing Nondestructive Inspection Methods.

Criteria:

Ride the Ducks of Seattle intends to employ the services of Mistra Group Inc. for nondestructive testing services on preventative inspections and for inspection of newly acquired Duck components. Ride the Ducks begins annual DOT preventative maintenance inspections every September. During these inspections, various components and/or systems of the Ducks will be disassembled and inspected. It is during this period that the Non-Destructive services as defined in this memorandum shall take place. Additionally, Ride the Ducks of Seattle intends to utilize Non-Destructive testing for newly purchased or acquisitions of replacement steer axle housings, drive axle housings and steer axle spindles. It is mandatory that newly purchased or acquired parts be tested for serviceability prior to being entered into the parts supply inventory for Ride the Ducks of Seattle.

Tracking and Record Keeping:

Ride the Ducks of Seattle has implemented a tracking system, including permanent component serial numbers, to define each component and to maintain location and status of all steer axle housings, drive axle housings, and steer spindles. Identification for each component are as follows:

Truck Duck Axle/s Data

- TD Steer axle housings
    - Part #7521744
    - Permanent serial number identification will begin with TDS (Truck Duck Steer). This will be followed by a numeric designator.
- TD Rear/Drive Axle housings
    - Part #7521728
    - Permanent serial number identification will begin with TDR (Truck Duck Rear). This will be followed by a numeric designator.
- TD Steer axle spindles
    - Original Part number #7521680, replacement part #4316SP.
    - Permanent serial number identification is designated by three numbers beginning with 001.

Stretch Duck Axle/s Data

- SD Steer axle housings
  - Part #7411366
  - Permanent serial number identification will begin with SDS (Stretch Duck Steer). This will be followed by a numeric designator.
- SD Drive Axle housings
  - Part #7411297
  - Permanent serial number identification will begin with SDR (Stretch Duck Rear). This will be followed by a numeric designator.
- SD Tag Axle housings
  - Part #7411298
  - Permanent serial number identification will begin with SDR (Stretch Duck Rear). This will be followed by a numeric designator.
- SD Steer axle spindles
  - Original Part number #7521680, replacement part #4316SP.
  - Permanent serial number identification is designated by three numbers beginning with SD001.

The standards and procedures set forth in this memorandum will be utilized and maintained by Ride the Ducks of Seattle. The specifications contained in this SOP will be subject to amending by Ride the Ducks of Seattle when or if the industry standards change, vendor requirements need to be modified or we, the requesting customer, need to adjust our criteria.

Field Testing for In-Service Vehicles

Appointments:

All request for NDT appointments shall be made in advance and will include relevant information for component test area, part numbers and permanent serial numbers. On the date and time of the requested appointment, a Nondestructive inspector will arrive at the Ride the Ducks of Seattle maintenance facility, 4203 9th Ave. NW, Seattle, WA 98107, with all require tools and equipment to conduct Non-Destructive Testing of all specified and pre-staged equipment.

Testing Process:

The standard testing procedure shall be in accordance with **ASTM E709** Standard Guide for Magnetic Particle Testing (MT) which is Mistras procedure 100-MT-001 for material and welds. The criteria of acceptance will be **No Cracks**. This standard will remain in place for all inspections. Any changes to the requested ASTM-E709 criteria will be made in writing by the Director of Operations or Maintenance Manager for Ride the Ducks of Seattle.

Preparation of the areas to be tested will be done by Ride the Ducks of Seattle. Inspection areas shall be clean and free of all foreign debris. Paint, slag, rust, grease, oil or dirt should be removed by applying a cleaning solvent, the use of a steam cleaner, or a wire wheel.

The axle and spindle testing will be conducted in accordance with all regulatory guidelines. Ride the Ducks of Seattle has determined, and the following pages will define, the primary and secondary areas that are to be tested on each component.

Primary Inspections require Magnetic Particle Inspection by a certified Inspector per the requirements of SNT-TC-1A.

Secondary Inspections require Visual Inspection (VT) by Ride the Ducks of Seattle. Should for any reason Ride the Ducks determine there are issues with these areas, Magnetic Particle Inspection by a certified NDT Inspector per the requirements of SNT-TC-1A may be requested. If Secondary Inspections are requested, all surfaces to be inspected will be prepared in accordance with the requirements of ASTM E709 and this document.

During the testing, any and all indications during the screening test will be brought to the attention of the on-duty maintenance supervisor. The maintenance supervisor will visually confirm and address any indication with an emery cloth or wire wheel, thus ensuring that the indication is not a result of surface marring. The area of indication will be tested again for confirmation. If the indication is still present the tester will mark the location of the indication for reference and/or further examination.

Parts that continue to show indications, following the confirmation test, will be removed for possible repair or disposal. Replacement parts that have been previously verified as indication or crack free will be drawn from the Ride the Ducks of Seattle parts inventory and will be installed as replacement.

In-House Testing for restock and replacement components

All request for Non-Destructive testing of restock components will take place at the Mistras Group Inc. facility at 7820 S. 210th St. #110, Kent, WA 98032. Components for testing will include a detailed work order request and be accompanied by all relevant identification numbers.

Testing Process:

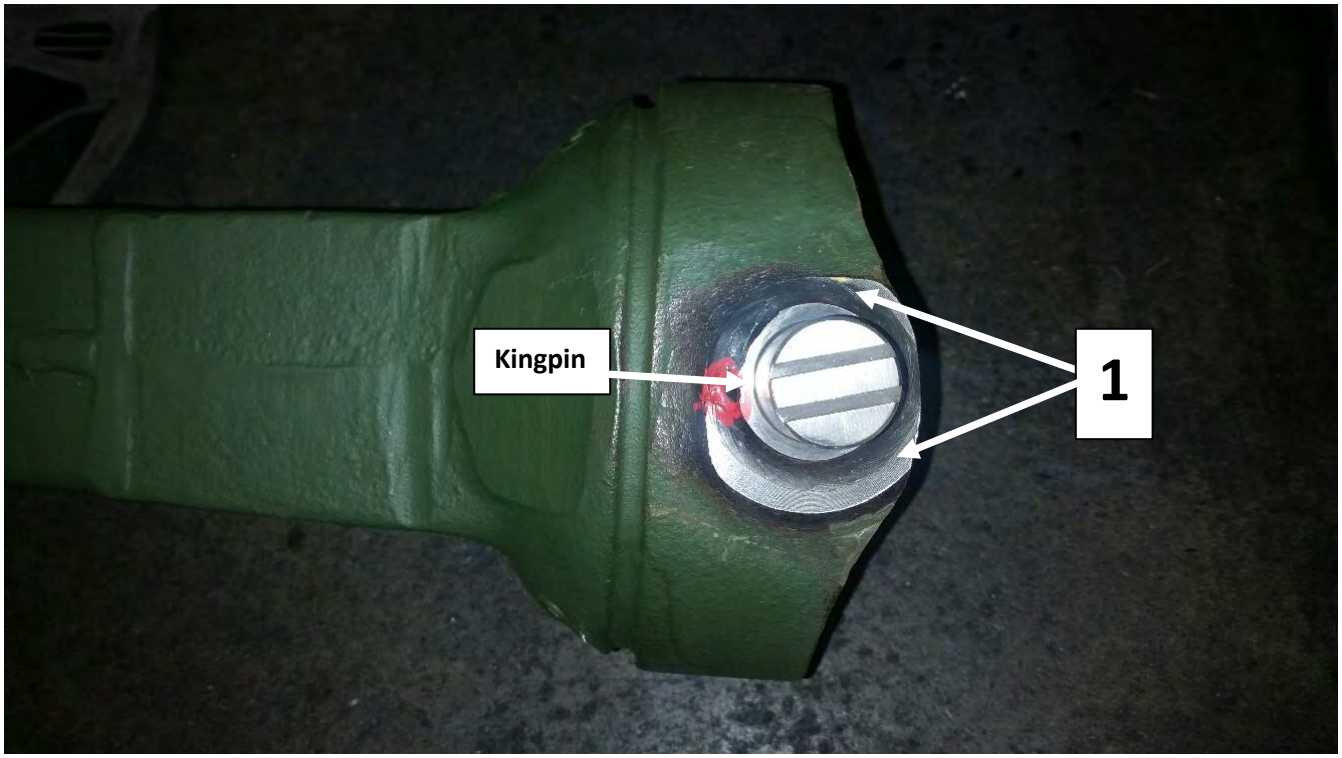
The standard criteria of acceptance will be, **No Cracks**. This standard will remain in place for all inspections. Any changes to the criteria will be made in writing by the Director of Operations or Maintenance Manager for Ride the Ducks of Seattle.

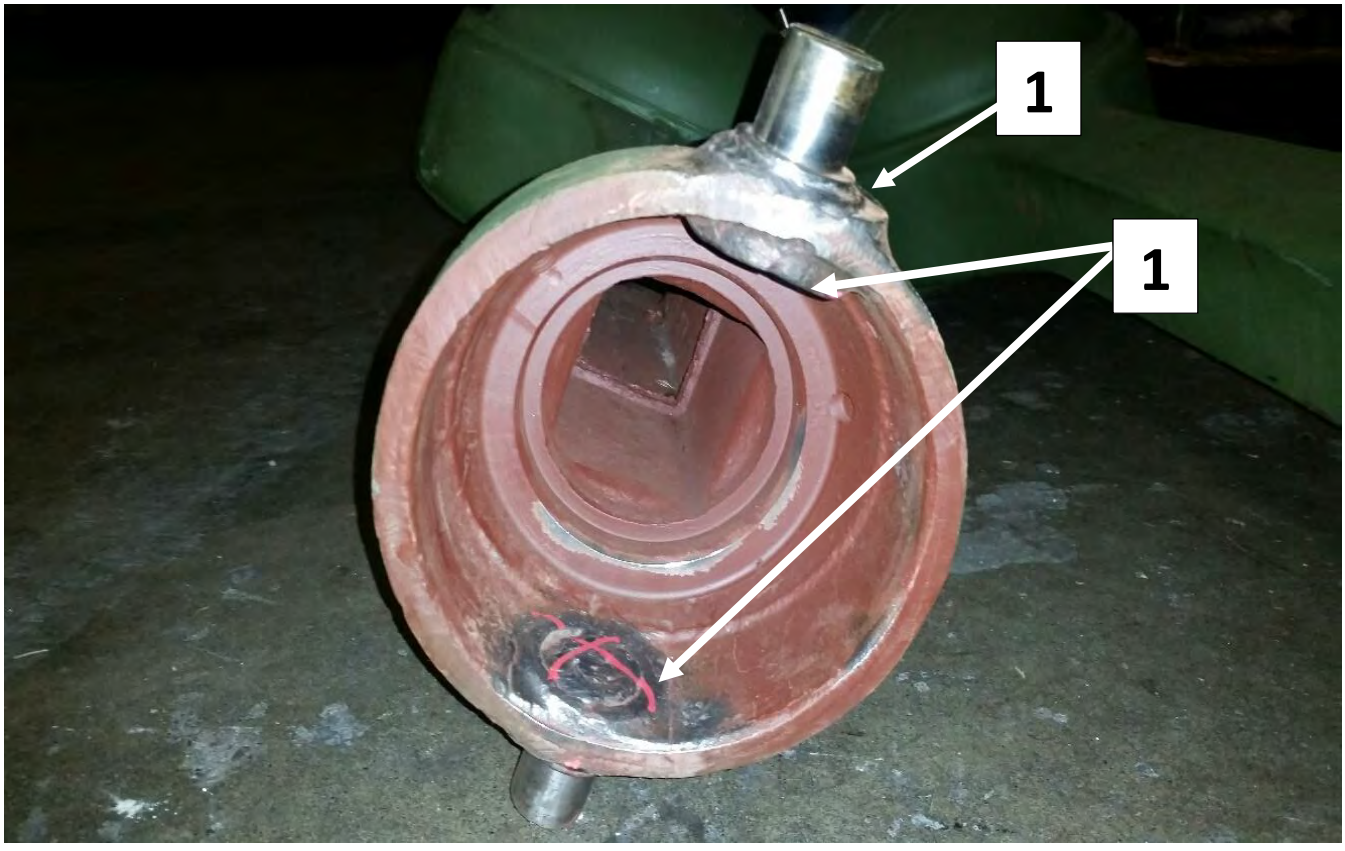
Preparation of the areas to be tested will be in accordance with ASTM E709. The surface of the part to be examined should be essentially clean, dry, and free of contaminants such as dirt, oil, grease, loose rust, loose mill sand, loose mill scale, lint, thick paint, welding flux/slag, and weld splatter that might restrict particle movement. When examining a local area, such as a weld, the areas adjacent to the surface to be examined, must also be cleaned to the extent necessary to permit detection of indications. Paint, slag, rust, grease, oil or dirt should be removed by applying a cleaning solvent, the use of a steam cleaner, or a wire wheel or other method which will not smear the metal surface.

After all testing has been completed, the testing facility will provide Ride the Ducks of Seattle with a packet containing a copy of all items tested and the individual test results sheet per component. The completed paperwork will be filed and retained at the Ride the Ducks of Seattle Maintenance Facility for the entire life cycle of the component and for historical references.

Truck Steer Axle Primary Inspection Area:

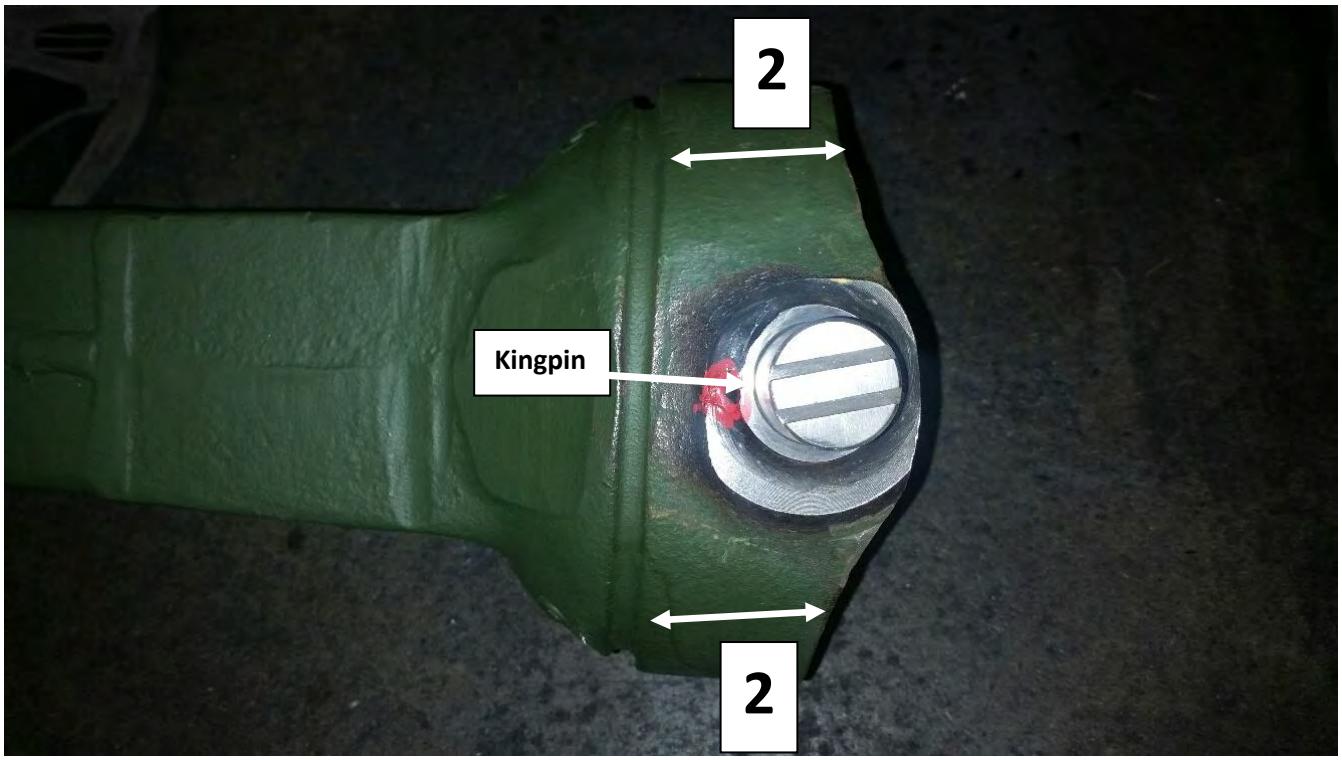
1. **<u>Primary inspection</u>** (Magnetic Particle Inspection Required) of the external welds surrounding the Kingpin and internal welds securing the Kingpin to the housing





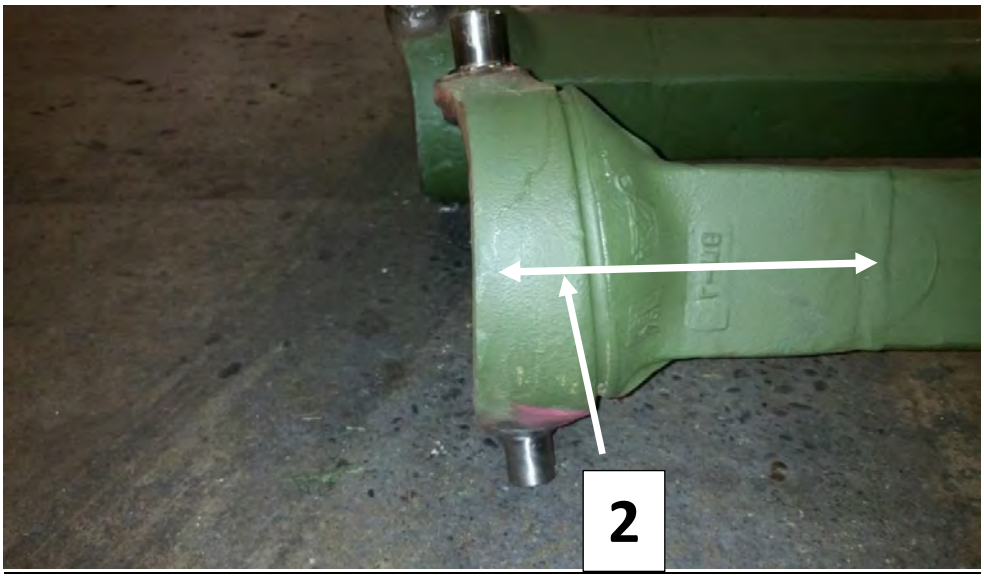
Truck Steer Axle Secondary Inspection Area:

2. **<u>Secondary Inspection</u>** (Visual Inspection unless requested for Magnetic Particle Inspection) of the entire width of the steer cup and around the circumference



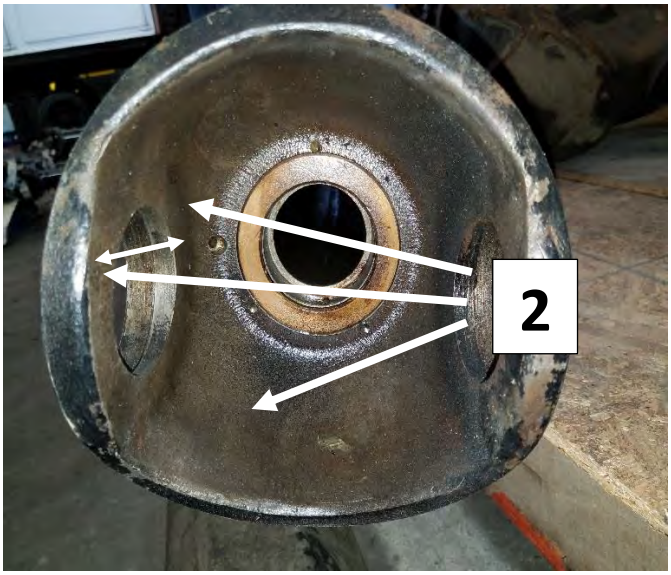
Truck Steer Axle Secondary Inspection Area (cont.):

2. **Secondary Inspection** (Visual Inspection unless requested for Magnetic Particle Inspection) Steer cup ring to the butt-weld on square axle housing shaft



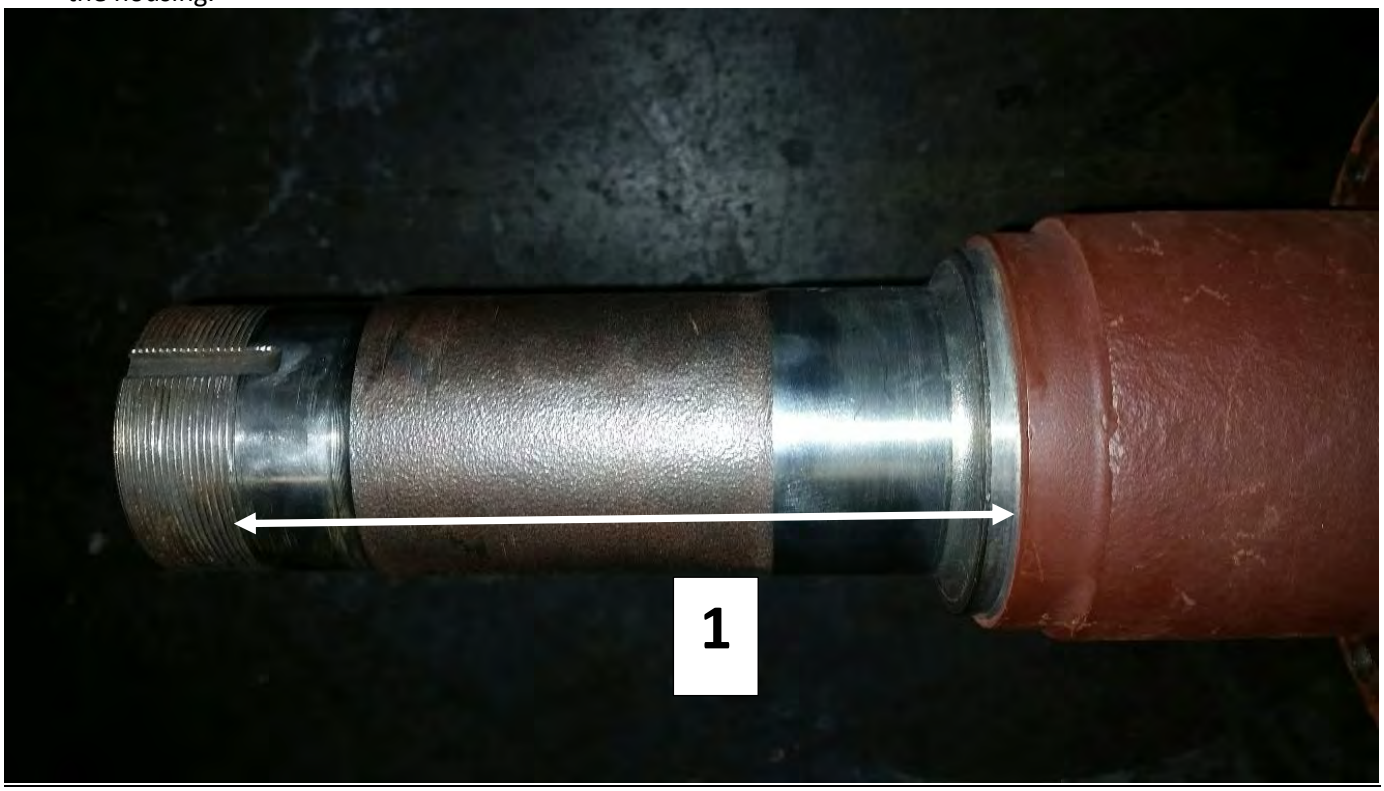
Stretch Duck Steer Axle Primary Inspection Area:

Stretch Duck Steer Axle Secondary Inspection Area:



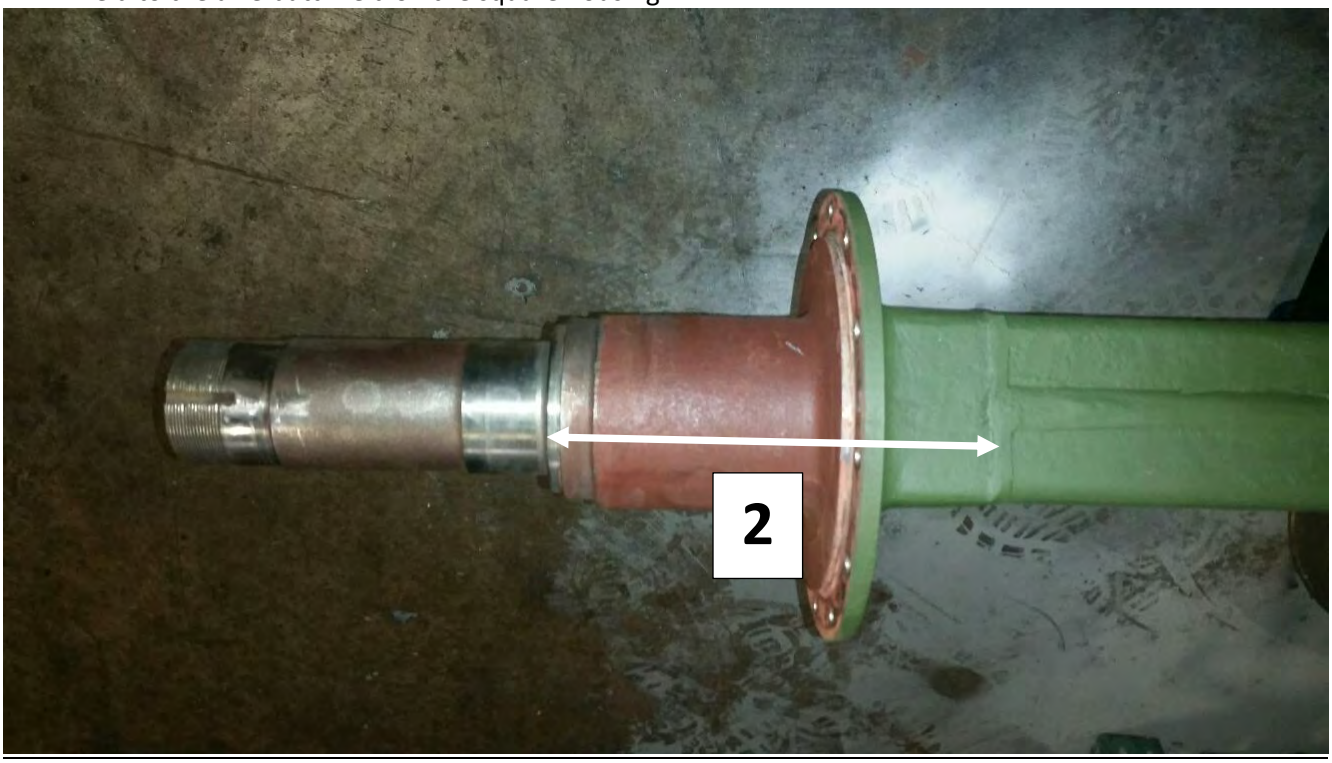
Rear Axle Primary Inspection Area:

1. **<u>Primary inspection</u>** (Magnetic Particle Inspection Required) of Spindle end to the weld at the union point with the housing.



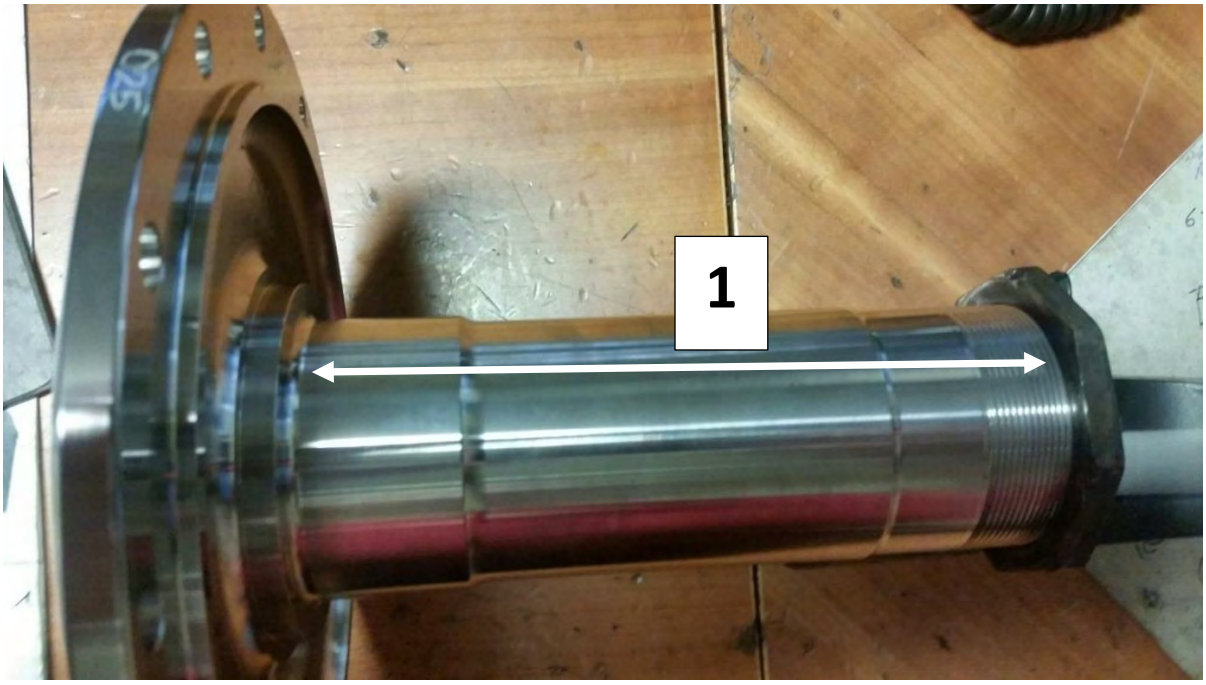
Rear Axle Secondary Inspection Area:

2. **<u>Secondary Inspection</u>** (Visual Inspection unless requested for Magnetic Particle Inspection) of Spindle union weld to the axle butt-weld on the square housing

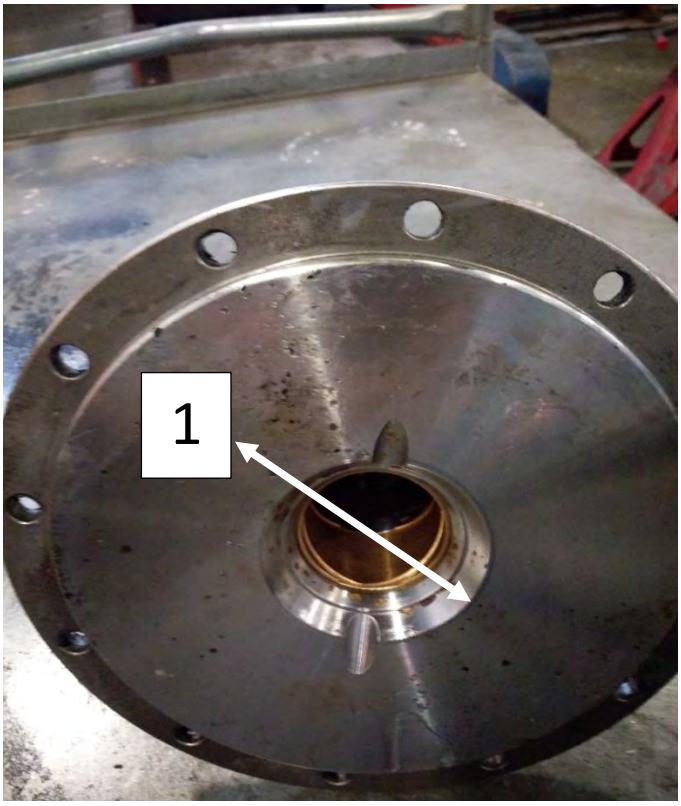


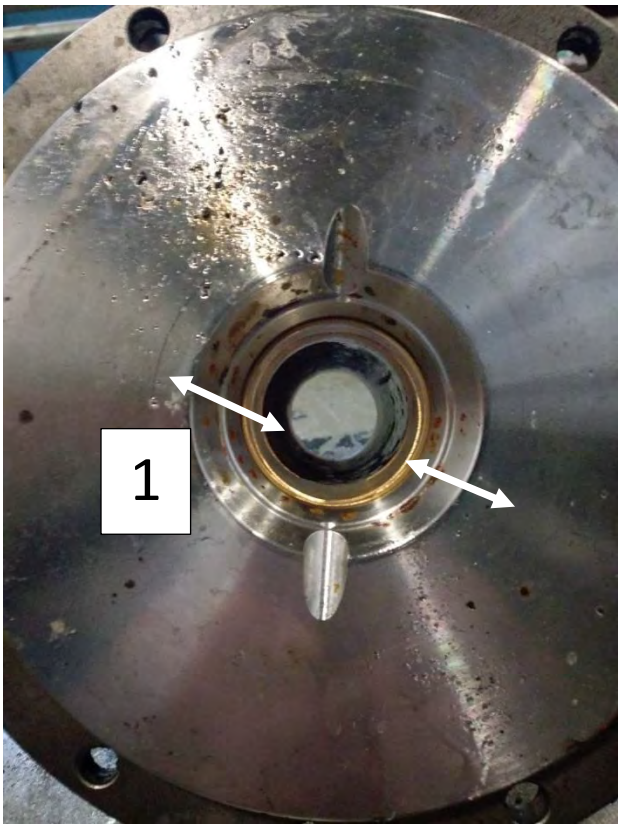
Steer Axle Spindle Primary Insp Area:

1. **<u>Primary inspection</u>** (Magnetic Particle Inspection Required) Spindle shaft to flange union.



Steer Axle Spindle Secondary Insp Area:





Conclusion

The procedures that have been adopted in this memorandum are in pursuant to our ever evolving safety standards. If there is a need for modifications or re-assessment of the process all parties involved will be notified appropriately in writing providing any and all modifications. If there are any questions or concerns regarding this memorandum, they should be addressed to Ride the Ducks of Seattle, at 516th Broad St, Seattle, WA 98109, phone number 206-441 4647.

Ryan Johnson
Director of Operations

Joe M. Hatten
Maintenance Manager

Exhibit 14

Backeye®360° Camera Systems

4 cameras
1 image
0 blind spots

Actual Backeye®360 images

This exciting new development provides drivers with a single clear view image of all near-field blind spots around the vehicle – which is a massive leap forward in vehicle safety!

Ultrawide-angle cameras mounted on the front, sides and rear of the vehicle capture the surrounding areas of the vehicle, including blind spots. The digital images from these cameras are processed and 'video stitched' together to produce a top-down 360° 'birds eye view' of the vehicle and surrounding areas in a single image.

The software also removes the fisheye camera effect, so that the driver is presented with a clear and undistorted image.

Backeye®360 Systems are compatible with Brigade MDR digital recorders, providing you with footage that can help make major cost savings by refuting bogus claims, and providing evidence in the event of any accident or incident.

- **Eliminates blind spots, improves safety**
- **Comprehensive view of the surrounding area in a single image**
- **Reduces collisions with people and objects**

Features	Benefits	Backeye®360 ASL360	Backeye®360 BN360
Customizable triggers	Best view of each maneuver	Bespoke views 8 triggers	Fixed views 3 triggers
Dual views on monitor	View the most critical areas	Bespoke image views	Fixed dual views
Customized joins between camera images	Seamless surround image optimized for your vehicle	✓	✓
Flexible camera positioning	Backeye®360 System will still be accurate if cameras installed off-center	✓	✓
Full-screen 360° view	Entire screen can be devoted to the 360° view	✓	✓
Automatic light balancing between camera images	Easy to view, balanced image	✓	×
'Pie dish' effect	Reduced image stretch, so that distant people and objects appear recognizable	✓	×
R46 Approved	Suitable to replace Class V and Class VI mirrors	×	✓

Which system is for you?

Backeye®360 BN360
Regulation 46 approved.

Full screen 360 or a twin image split screen view.

In split screen mode, the 360 ‘birds eye view’ is permanently displayed together with the blind spot to the front, rear, left or right of the vehicle – auto-switching between these according to vehicle maneuver.

This means that the driver always has both the 360 ‘birds eye view’ plus a conventional view of the area into which the vehicle is moving.

Backeye®360 ASL360
Suitable for most vehicle and mobile plant machines.
Full screen 360 plus a flexible and wide range of bespoke split screen viewing options.
‘Pie Dish’ image correction feature allows a wider area around the machine to be displayed to the driver, and provides a more natural view of objects that are at some distance from the vehicle.
Automatic light balancing between camera images makes for easier viewing on days when one side of the vehicle is bathed in bright sunlight and the other is in shadow.

Model	Part No:

360° CAMERA SYSTEM

BN360-000 - Backeye®360 system **4483**

- **IP69K cameras**
- **12-24Vdc**
- **Size (WxHxD) ECU 170 x 126.4 x 36mm 6.7 x 5 x 1.4 inches**
- **Size (WxHxD) Camera 35.4 x 60.7 x 45.8mm 1.4 x 2.4 x 1.8 inches**
- **2 year warranty**

Contents
- 1 x BN360-ECU-10
- 4 x BN360-100C cameras
- 1 x BN360-VBV-L4015 video-out cable to connect to SELECT range monitor.

Note: Monitor and camera extension cables not included

Features
- 360° full screen image or split screen option
- Triggered views (rear, left and right)
- 4 x ultra-wide viewing angle cameras (HxV) 185° x142°
- 1/3" CMOS sensor
- TV system: NTSC

Power
- Power consumption: 15 Watts
- Current: 1.23 Amps

Durability & Standards
- Mechanical vibration: 1G
- Mechanical shock: 50G
- Operating temperature: -30 to +75°C / -22 to 167°F
- CE marked
- EMC approved: E
- HALT tested

Note: A calibration kit is required for installation.

BN360 CABLES AND ADAPTERS

BN360-L120	**20m/66' camera cable**	**4493**
BN360-L115	**15m/49' camera cable**	**4495**
BN360-L110	**10m/33' camera cable**	**4496**
BN360-L105	**5m/16' camera cable**	**4498**
BN360-L1025	**2.5m/8' camera cable**	**4499**
AC-305	**Splitter cable for MDR (1 required per camera)**	**4903**

MOUNTING BRACKETS

BN360-100C-BKT01	**Adaptable mounting bracket** Can be shaped to allow installation on non-vertical surfaces	**4649**
BN360-100C-BKT02	**Mounting bracket to adjust camera angle**	**4714**
BE360-CD	**Deflector to shield camera from knocks** (To be used with BN360-100C-BKT02 Mounting bracket)	**4701**
BN360-100C-BKT03	**Deflector to shield camera from knocks**	**4743**

REQUIRED FOR ARTICULATED VEHICLES

BN360-Enclosure	**IP66 Enclosure kit to enable ECU to be installed on outside of vehicle** Note: Coiled cable kit or wireless connector also required	**4723**
SK-15-05	**3-camera Backeye®360 cable kit for articulated vehicles**	**5066**

USA/Mexico: +1 (260) 766-4343 sales@brigade-inc.com www.brigade-inc.com

Model	Part No:

360° CAMERA SYSTEM

ASL360-SV - Backeye®360 **4328**

- **IP68 cameras**
- **12-24Vdc**
- **Size (WxHxD) ECU 225 x 35 x 120mm 8.8 x 1.4 x 4.7 inches**
- **Size (WxHxD) Camera 70 x 50 x 62mm 2.7 x 2 x 2.4 inches**
- **2 year warranty**

Contents
- 1 x ASL360-ECU
- 4 x ASL360-CM2 cameras

Note: Monitor, camera cables and adapters NOT included

Features
- 360° full screen or split screen options
- Flexible blend widths and positioning
- Up to 30 frames per second
- Self-monitoring to eliminate frozen images
- Triggered views
- 4 x ultra-wide viewing angle cameras (HxV) 185 x 180°
- 1/4" CMOS sensor
- TV system: PAL

Power
- Power consumption: Camera: 0.5 Watts ECU: 5.0 Watts
- Current: Camera: 0.04 Amps ECU: 0.4 Amps

Durability & Standards
- Operating temperature: -40 to +85°C / -40 to +185F
- CE marked
- EMC approved: E

Note: A calibration kit is required for installation. Available to Brigade trained fitters only

ASL360 CABLES AND ADAPTERS

ASL360-L120	**20m/66' camera cable**	**4333**
ASL360-L115	**15m/49' camera cable**	**4334**
ASL360-L110	**10m/33' camera cable**	**4335**
ASL360-L1025	**2.5m/8' camera cable**	**4336**
AC-054	**2.5m/8' adapter cable to connect ECU to monitor via AC-016 / AC-024 (BNC B to Phono A)**	**4340**
AC-016	**Adapter cable to connect AV/Phono to Elite monitor**	**2150**
AC-024	**Adapter cable to connect AV/Phono to Select monitor**	**3183**

MOUNTING BRACKET

BE360-CD	**Deflector to shield camera from knocks**	**4701**

REQUIRED FOR ARTICULATED VEHICLES

BN360-Enclosure	**IP66 Enclosure kit to enable ECU to be installed on outside of vehicle** Note: Coiled cable kit or wireless connector also required	**4723**

Model **Part No:**

BN360 360º CAMERA MONITOR SYSTEMS

Complete kits including monitor, Backeye®360 camera system, cables and adapters

SE-7104F-100 - 360 camera monitor system for large rigid vehicles 4618

- 1 x VBV-7104FM - 10.4" monitor
- 1 x BN360-000 360 system
- 1 x BN360-L110 - 10m/33’ camera cable
- 2 x BN360-L115 - 15m/49’ camera cables
- 1 x BN360-L120 - 20m/66’ camera cable

See individual products for detailed specifications

- 2 year system warranty

SE-770-100 - 360 camera monitor system for large rigid vehicles 4804

- 1 x VBV-770M 7" monitor
- 1 x BN360-000 360 system
- 1 x BN360-L110 - 10m/33’ camera cable
- 2 x BN360-L115 - 15m/49’ camera cables
- 1 x BN360-L120 - 20m/66’ camera cable

See individual products for detailed specifications

- 2 year system warranty
- R46 Approved

R46

ASL360 360º CAMERA MONITOR SYSTEMS

Complete kits including monitor, Backeye®360 camera system, cables and adapters

SE-770-000 - 360 camera monitor system for large rigid vehicles 4803

- 1 x VBV-770M - 7” monitor
- 1 x ASL-360SV 360 system
- 1 x ASL-L110 - 10m/33’ camera cable
- 2 x ASL-L115 - 15m/49’ camera cables
- 1 x ASL-L120 - 20m/66’ camera cable
- 1 x AC-024 - phono adapter cable
- 1 x AC-054 - adapter cable

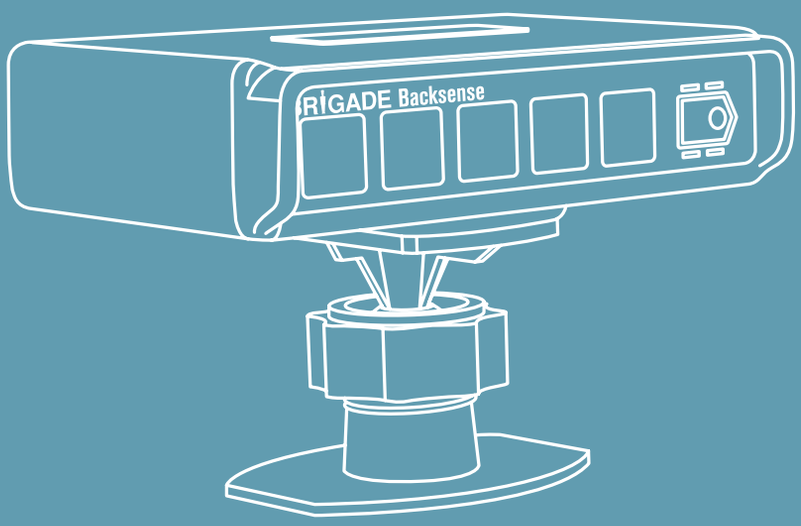
See individual products for detailed specifications

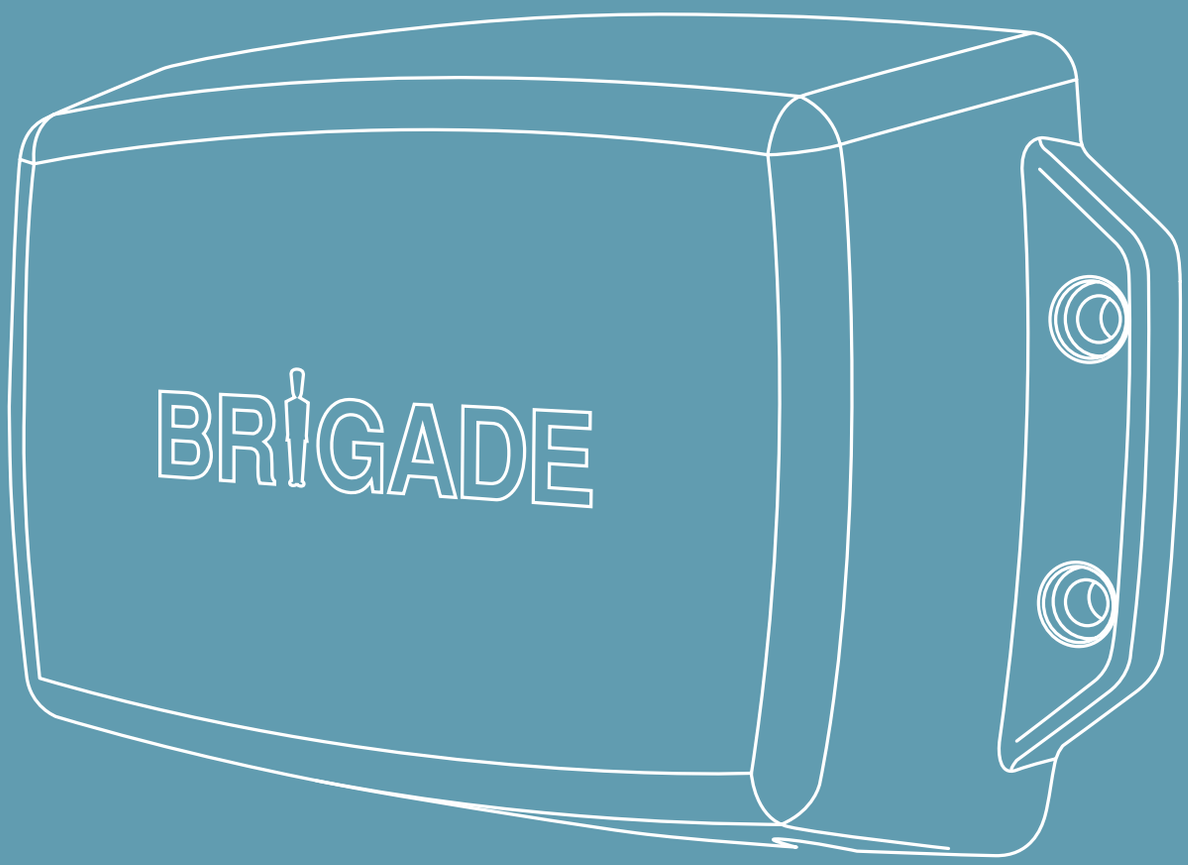
- 2 year system warranty

Exhibit 15

BRIGADE®

Vehicle Safety Solutions





Backsense®

Radar Sensors

Large vehicles, difficult conditions, greater danger!

Industries such as mining, quarrying, agriculture, construction and waste all use huge machines and plant equipment, which by their very nature pose a danger if they are not managed safely. Blind spots tend to be much larger on these vehicles and include not only the rear and nearside but also the front, especially with elevated driver positions. Terrains are harsher, vehicles are exposed to the elements more aggressively whilst thick dust and darkness decrease visibility further.

The ISO 5006 standard for earthmoving equipment addresses the problem of blind spots around a vehicle and states that the operator must be able to "see around the machine to enable proper, effective and safe operation." Camera monitor systems provide this to some extent, but in difficult environmental conditions a range of complementary devices are vital to give visual and audible operator warnings.

The UK Health & Safety Executive (HSE) warned about the dangers of poorly managed transport in the workplace after a coal mining company was fined following the death of two men crushed by a 100 tonne capacity dump truck. The dump truck driver could not see their vehicle because it was in a blind spot.

"Earth-moving vehicles have poor visual fields due to their large size. It is crucial that additional steps are taken to ensure that drivers of these machines are aware of other smaller vehicles around them."

Norrie Buchanan, HSE Inspector

Backsense® radar detection systems

Brigade's Backsense radar sensor systems are designed to detect people and objects in blind spots, significantly reducing accidents. They detect stationary and moving objects, providing the driver with in-cab visual and audible warnings - alerting the operator whose attention can not be focused on all danger areas. Backsense works effectively in harsh environments and in poor visibility including darkness, smoke and fog.

The Backsense® range

Backsense® Features:

- Close detection zone combined with targeted beam pattern
- Controlled beam pattern to minimise false warnings
- Excellent close-in detection
- Frequency modulated continuous wave radar technology
- Can trigger other vehicle safety devices such as camera monitor systems or reversing alarms
- Eliminates possibility of driver interference. The audible warning buzzer cannot be switched off, providing fleet operators with peace of mind
- Clear, easy-to-read display and wide volume range of audible alert
- Suitable for both on- and off-road applications
- Extremely rugged design for severe weather conditions and all terrains
- Effective through non-metallic objects - can fit behind plastic or glass fibre body work
- Self-diagnostics alert operator to system errors
- Choice of detection ranges
- 5 stage audible and visual display
- Comprehensive certification

Every Backsense® has an in-cab audio alert and LED display to alert the operator to hazards and their proximity.

In-cab display and Backsense® radar

Programmable Backsense®

BS-8000

- Configurable:
  - Detection area
    - 3m (10ft) – 30m (98.5ft) length
    - 2m (6.5ft) – 10m (33ft) width
  - 5 detection zones
  - Blind zones – system ignores objects in specified zones, e.g. vehicle bodywork
  - Trigger output length – controls when other equipment, e.g. a warning alarm, is activated
  - Buzzer starting zone – audible alert can be set to activate after the visual signal
- Simple-to-use PC-based configuration software – no bespoke programming equipment required

Fixed Backsense®

- Fixed detection length and width divided into 5 equal detection zones
- Buzzer and trigger output activate in all zones on detection

BS-7030

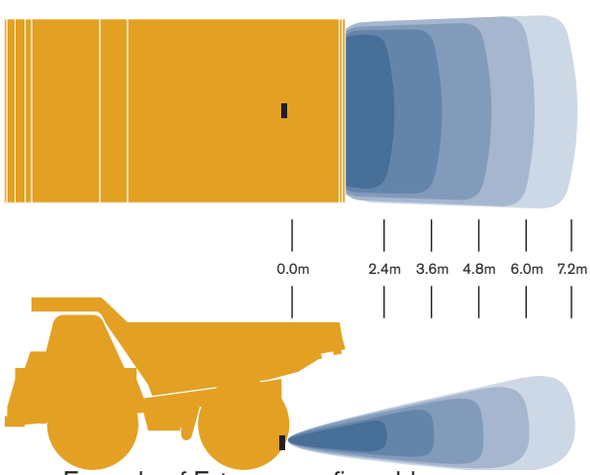
- 3m (10ft) length x 2.5m (8ft) width detection area
- 5 x 0.6m (2ft) detection zones

BS-7045

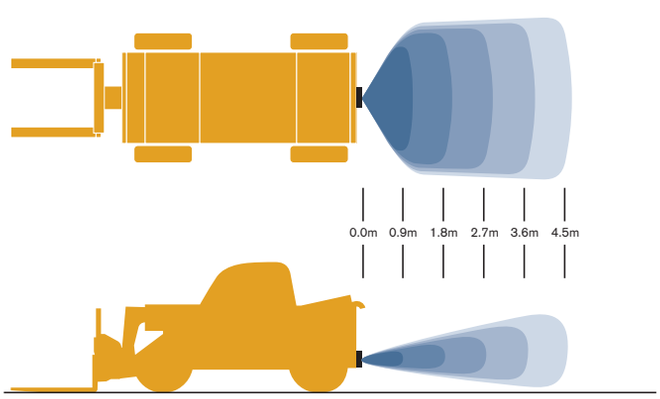
- 4.5m (15ft) length x 3.5m (11.5ft) width detection area
- 5 x 0.9m (3ft) detection zones

BS-7060

- 6m (19.5ft) length x 4.5m (15ft) width detection area
- 5 x 1.2m (4ft) detection zones



Example of Extreme configurable zones



Example of Elite fixed zones

Diagrams are for illustration purposes only. Detection is affected by an object's physical properties and location.

Benefits of Backsense®

Safety

- ✔ Helps prevent collisions
- ✔ Reduces accidents and fatalities, injury and sickness time
- ✔ Meets Health and Safety requirements

Efficiency

- ✔ Saves collision damage cost and downtime
- ✔ Saves on third party claims

Compatibility

- ✔ Can be set up to trigger reversing alarms, safety lights, camera systems and digital recorders

Ruggedness

- ✔ Unaffected by moisture, dust, vibration, heat, cold, UV, snow, ice, high wind, water and mud

Backsense® for lighter duty machines

Suitable for light machines with extensive or varying blind spots, such as telescopic handlers; and machines operating in confined spaces, such as small wheeled low-loading shovels.

Backsense® for Mining, Quarry and Construction

Backsense is the answer where machine size and difficult environmental conditions, such as dust clouds or darkness, make manoeuvring particularly dangerous. It reduces the risk of large machines reversing into smaller machines or overturning following collision with a stock pile.

It is equally beneficial for forward movement, with machine design often creating large blind spots - for instance many dumper trucks cannot see objects or people on the ground as far as 20 metres in front of them. It is possible to calibrate out bodywork and vehicle protrusions in the detection area to prevent false alarms. Backsense also reduces risk for site workers wearing ear defenders who may be unable to hear reversing alarms.

Backsense® for the Refuse Industry

Narrow-beam options are especially useful when manoeuvring close to parked cars, and bin-lift mechanism detection can be programmed out to prevent false alerts.

To order or for more information on Brigade's vehicle safety solutions;

brigade-electronics.com

+44 (0)1322 420300

or visit your local stockist

Brigade's extensive portfolio of machine safety systems includes:

- **Backeye®360 Camera monitor systems**
- **Camera monitor systems**
- **'White sound' reversing and warning alarms**
- **Radar obstacle detection systems**
- **Mobile digital recording**
- **Ultrasonic obstacle detection systems**

Brigade products are designed to improve safety in and around commercial vehicles and mobile plant. Safety systems do not replace driver best practice. Please take care when manoeuvring.

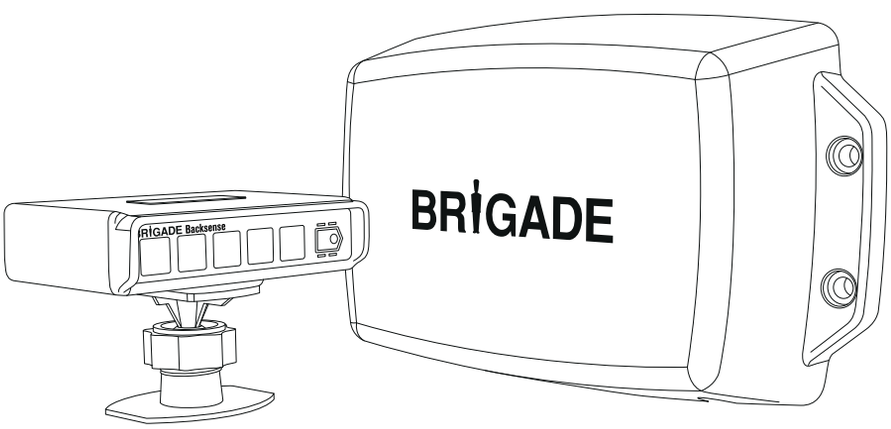


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Exhibit 16

Fleet Tracking

We provide the most efficient solutions for tracking and managing your fleet, regardless of size. Get a competitive advantage and outperform your competition with real time fleet tracking.

Features:

Geo-Fence Alerts

Excessive Idle Detection

Ignition On/Off Reporting

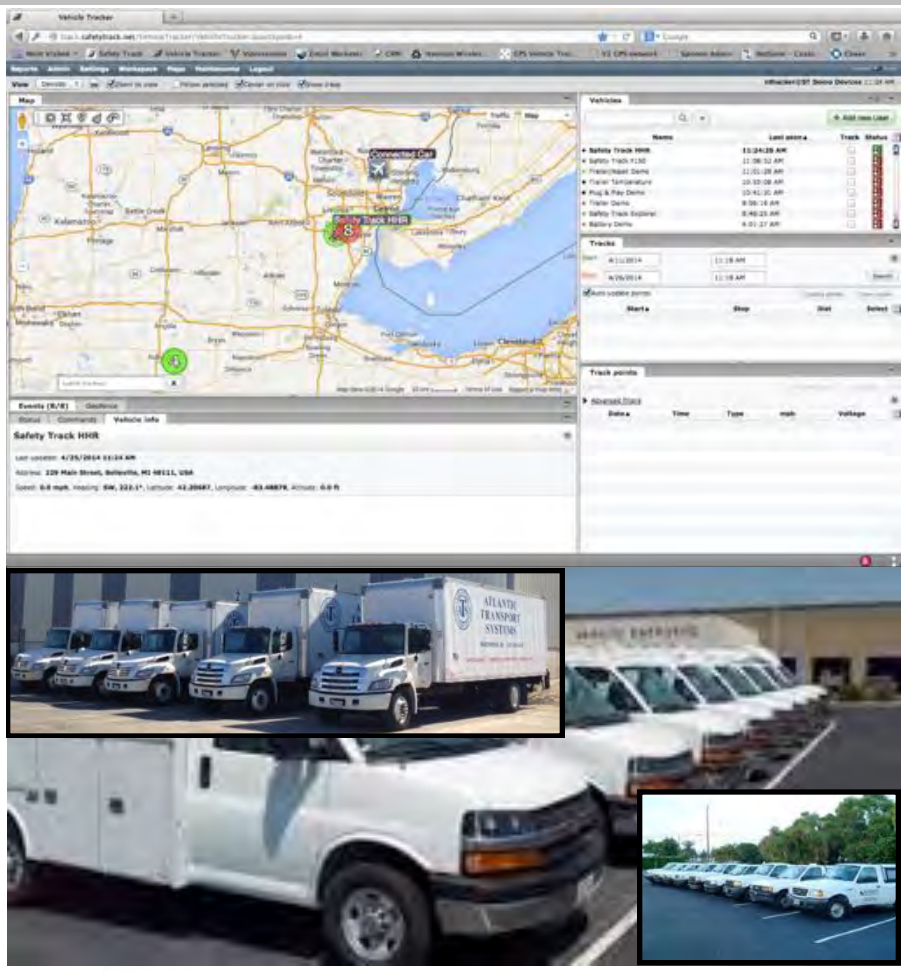
Scheduled Maintenance

Hard Speed, Brake and Turn Alerts

Web-Based User Interface with Google maps

Driver Score Card

Dimensions: 1.84 x 3.0 x 0.78”
Weight: 3.5 oz (99g)



Benefits:

Reduce Fuel Costs

Reduce Labor Costs

Increase Productivity

Improve Driver Safety/Behavior

Increase Fleet Security/Theft protect

Lower Insurance Premiums

ST-2500

Please contact us for pricing. We would be happy to provide the best possible solution for you!

Safety Track

Contact us:
249 Main Street
Belleville, MI 48111
Main Office: 734.699.7633
www.safetytrack.net