

FILED
SECURITIES DIVISION

MAR 13 2012

INDIANA
SECRETARY OF STATE

STATE OF INDIANA
OFFICE OF THE SECRETARY OF STATE
AUTO DEALER SERVICES DIVISION

IN THE MATTER OF:)
) Cause No. DLR 12-0081 CA
VIPER MOTORS, LLC,)
)
Respondent.)

CONSENT AGREEMENT

The Office of the Indiana Secretary of State, Auto Dealer Services Division (the “Division”) and Respondent Viper Motors, LLC (“VM”) agree and stipulate to the following:

1. The Division is a division of the Office of the Secretary of State. The Division has jurisdiction over matters relating to automobile dealers, as provided by Indiana Code § 9-23-0.7-1.
2. VM is a business entity that provided the Division with a last known business address of 5152 Lafayette Road, Indianapolis, Indiana, 46254.
3. VM is also a dealer, or other entity defined by Indiana Code § 9-23-2-1, that holds Indiana dealer license #1101265.
4. On or about December 2, 2011, the Division received information that dealer plate #38257B issued to VM was being used in violation of 75 Indiana Administrative Code § 2-2-5.
5. This Consent Agreement deals only with the allegation made by the Division against VM referenced herein prior to the last date on which this Consent Agreement is signed.
6. In lieu of further administrative proceedings, VM and the Division agree as follows:

- (a) VM waives its right to a hearing pursuant to Indiana Code § 9-23-2-14(d).
- (b) VM waives its right to an appeal pursuant to Indiana Code § 9-23-2-17.
- (c) VM shall pay a total civil monetary penalty of Five Hundred Dollars (\$500.00) to the Division.

(d) VM agrees not to violate any statutes or administrative regulations that pertain to dealers including, but not limited to, the Indiana Motor Vehicles Manufacturers, Distributors, and Dealers Act, Indiana Code § 9-23-2.

7. The failure of VM to adhere to the terms of this Consent Agreement shall constitute grounds for administrative action against VM and any party involved in the violation.

8. This Consent Agreement is executed in the public interest to avoid the necessity and burden of a public hearing. This Consent Agreement may be used to show repetitive conduct should VM commit future violations of the Act.

9. The parties to this Consent Agreement agree that all the terms of the Agreement are contractual and that none is a mere recital.

10. This Consent Agreement may be executed in multiple counterparts, each of which shall be considered binding on all parties.

11. This Consent Agreement is expressly subject to the approval of the Commissioner, and should the Commissioner fail or refuse, for any reason, to approve this Consent Agreement, the same shall be of no force or effect, and it shall not be admissible into evidence nor referred to any hearing held in connection with the matters referred to herein.

-- Please see following page for continuation of this Consent Agreement. --

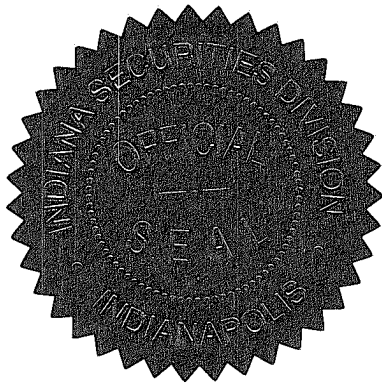
VIPER MOTORS, LLC

By: [Signature]
Printed: Muhammad El-Qulali
Title: Owner
Date: 3-12-2012

INDIANA SECRETARY OF STATE
AUTO DEALER SERVICES DIVISION

By: [Signature]
Ashley Humphries
Enforcement Attorney
Date: 3/13/12

APPROVED and ORDERED at Indianapolis, Indiana this 13TH day of MARCH, 2012.



OFFICE OF THE INDIANA
SECRETARY OF STATE

[Signature]
CHRIS NAYLOR
SECURITIES COMMISSIONER