

ASSESSOR'S

EVIDENCE

Washoe County
Appeal Summary Page-Unsecured Roll

Hearing # 18-0035P17
Hearing Date 02/15/2018
Tax Year 2017-18

Account #: 5100984
DBA: DOWTY CAPITAL GROUP LLC
Location: RENO TAHOE AIRPORT
Owner: BRET DOWTY
Mailing Address: PO BOX 102
MCDERMITT NV 89421
Account Type: AIRCRAFT
NAICS: 481 AIR TRANSPORTATION
Assessment/Billing Date: 10/18/2017
Assessment Type: Regular per NRS 361.260 (1)
 Estimated per NRS 361.265 (4)
 Corrected per NRS 361.765, 361.767, or 361.768



Valuation: Taxable: \$80,625 Current OBS: N/A
Assessed: \$28,219

Remarks: Aircraft is a 2002 Cirrus Design Corp model SR22. Tail number N910JR.
See discussion on page 2.

ASSESSOR'S EXHIBIT I
20 PAGES

RECOMMENDATION: Uphold Reduce
80,625 28,219

Prepared by: Justin Taylor, Auditor/Appraiser

Approved by: Mark Stafford, Senior Appraiser

Pursuant to NRS 361.260 the Assessor is required to discover all taxable property within the county as of the July 1st lien date (Page 3). The Reno-Tahoe Airport Authority (RTAA) reported the subject aircraft to be hangered at Reno Tahoe International Airport effective July 1, 2017 (Pages 4 and 5). The Assessor reopened the account where we had previously assessed the aircraft in 2006-07 and 2007-08. Our office mailed a Notice to File a property declaration on August 8, 2017 and a Final Notice to file on August 31, 2017 (Page 6). The taxpayer submitted the property declaration on September 8, 2017 (Page 7). The taxpayer reported the aircraft is currently registered in the State of Oregon and is based at 26U, the McDermitt Airport (Oregon side). The FAA registration shows the owners address to be McDermitt, Nevada.

Research conducted by our office shows that the taxpayer is a managing member and registered agent for Iridium Consulting, LLC located at 8700 Technology Way in Reno, NV (Page 8). This is the same mailing address of record when the aircraft was assessed by Washoe County in prior years. The taxpayer states on Iridium's website that "owning an airplane gives me and the team a mobility advantage" (Page 9). The aircraft owner has a business presence in Washoe County and hangars the aircraft at Reno-Tahoe. As such, the aircraft is not here casually nor is it simply en route to its' ultimate location. We believe the aircraft has established a taxable situs in Washoe County. Additionally, the property established contact with the taxing authority to confer upon it the opportunities, benefits and protections afforded by the taxing authority. (*Ott v. Mississippi Barge Line* (1949) 336 U.S. 169,174). Based upon the above findings, a tax bill was issued on October 18, 2017.

The taxpayer objected to the assessment saying the aircraft is in Washoe County enough for him to justify leasing hanger space, but does not consider it based here. Our office requested a copy of the flight logs for the aircraft via e-mail on 1/2/2018 (page 10). A follow-up phone call was also made. No response was given. Pursuant to administrative regulations codified in LCB File No. R019-17 Section 30, the burden rests with the taxpayer to provide documentation supporting taxable situs (Page 11).

NRS 361.260 Method of assessing property for taxation; appraisals and reappraisals.

1. Each year, the county assessor, except as otherwise required by a particular statute, shall ascertain by diligent inquiry and examination all real and secured personal property that is in the county on July 1 which is subject to taxation, and also the names of all persons, corporations, associations, companies or firms owning the property. The county assessor shall then determine the taxable value of all such property, and shall then list and assess it to the person, firm, corporation, association or company owning it on July 1 of that fiscal year. The county assessor shall take the same action at any time between May 1 and the following April 30, with respect to personal property which is to be placed on the unsecured tax roll.

2. At any time before the lien date for the following fiscal year, the county assessor may include additional personal property and mobile and manufactured homes on the secured tax roll if the owner of the personal property or mobile or manufactured home owns real property within the same taxing district which has an assessed value that is equal to or greater than the taxes for 3 years on both the real property and the personal property or mobile or manufactured home, plus penalties. Personal property and mobile and manufactured homes in the county on July 1, but not on the secured tax roll for the current year, must be placed on the unsecured tax roll for the current year.

3. An improvement on real property in existence on July 1 whose existence was not ascertained in time to be placed on the secured roll for that tax year and which is not governed by subsection 4 must be placed on the unsecured tax roll.

4. The value of any property apportioned among counties pursuant to [NRS 361.320](#), [361.321](#) and [361.323](#) must be added to the central assessment roll at the assessed value established by the Nevada Tax Commission or as established pursuant to an appeal to the State Board of Equalization.

5. In addition to the inquiry and examination required in subsection 1, for any property not reappraised in the current assessment year, the county assessor shall determine its assessed value for that year by:

(a) Determining the replacement cost, subtracting all applicable depreciation and obsolescence, applying the assessment ratio for improvements, if any, and applying a factor for land to the assessed value for the preceding year; or

(b) Applying to the assessed value for the preceding year a factor for improvements, if any, as adopted by the Nevada Tax Commission in the manner required by [NRS 361.261](#), and a factor for land developed by the county assessor and approved by the Commission. The factor for land must be so chosen that the median ratio of the assessed value of the land to the taxable value of the land in each area subject to the factor is not less than 30 percent nor more than 35 percent.

6. The county assessor shall reappraise all real property at least once every 5 years.

7. The county assessor shall use the standards for appraising and reappraising land adopted by the Nevada Tax Commission pursuant to [NRS 360.250](#). In using the standards, the county assessor shall consider comparable sales of land before July 1 of the year before the lien date.

8. Each county assessor shall submit a written request to the board of county commissioners and the governing body of each of the local governments located in the county which maintain a unit of government that issues building permits for a copy of each building permit that is issued. Upon receipt of such a request, the governing body shall direct the unit which issues the permits to provide a copy of each permit to the county assessor within a reasonable time after issuance.

FENNEMORE CRAIG
ATTORNEYS

Ann Morgan
amorgan@fclaw.com

300 E. Second Street, Suite 1510
Reno, NV 89501
PH (775) 788-2204 | FX (775) 788-2286
fennemorecraig.com

July 20, 2017

VIA FACSIMILE LSATO@WASHOECOUNTY.US

Lynn Sato
Washoe County Assessor's Office
Personal Property Division
P.O. Box 11130
Reno, NV 89520

Re: Reno-Tahoe Airport Authority - Public Records Request

Dear Ms. Sato:

This firm represents the Reno-Tahoe Airport Authority ("RTAA"), operator of the Reno-Tahoe International Airport and the Reno-Stead Airport. The RTAA has asked this firm to respond to your public records request. Accordingly, this letter shall constitute a response within the meaning of the Nevada Public Records Act, NRS 239.010, et seq. (the "Act").

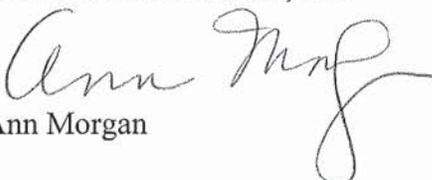
The RTAA confirms receipt of your correspondence of June 21, 2017.

You have requested:

"[A] listing of aircraft, their related N numbers, and the names and addresses of owners/operators who store their aircraft at your facility. The listing should be effective July 1, 2017."

Responsive to your request, attached please find an updated spreadsheet showing the names, addresses and N numbers of aircraft the RTAA believes to be stored at the Reno-Tahoe International Airport. The RTAA cannot confirm that this information is current as of July 1, 2017, as the purpose in having the information is to confirm insurance coverage in hangars which is not done on any regular schedule.

Sincerely,
FENNEMORE CRAIG, P.C.


Ann Morgan

AMOR
enc.

	Company	Owner	Address	City	State	Zip	Aircraft Number
E01	Paul Hiss-Padal, Inc	Paul Hiss/Doug Devries	2690 Lakeridge Shores West	Reno	NV	89519	N700TJ
E02	Mowbrav Aviation	Jerv Mowbrav	150 Ridoe Street	Reno	NV	89501	N165K/ N321KF
E03	VACANT						
E04	James Martin	James Martin	8688 18th Hole Trail	Reno	NV	89523	N970WM/N101PR
E05		Robert Saxton	1492 MacDonald Ranch Drive	Henderson	NV	89012	N1562X
E06	Richard Richmond	Richard Richmond	16466 NE 32 Ave	Miami	FL	33160	N242LE
	Vacant						
E07	Vientos, LLC	Chris O'Neil	10796 Mistv Meadows Drive	Reno	NV	89521-8235	N601RV
E07	Online Aerial Photo	Wes Brush	1598 Shadv Oak Drive	Sparks	NV	89434	N9976M/N52JP
E08	N9841X, LLC	Mr. Berman/ Lvie Martin	68 Indian Ridoe Road	Kallispell	MT	59901	N9841X
E09		Randall Goode	PO BOX 3690	CARSON CITY	NV	89702	N36LF
E10	Mad River	John Parsons	POB 7381	Reno	NV	89510	N2466N/ N5667S
E11	Tahoe Aviation	Joseph Walker / Richard Blakev	4840 Buckhaven Road	Reno	NV	89509	N7208M
E12		Bret Dowtv	165 Reeves Rd	McDermitt	NV		N910JR
E13	Anthony Hoskins	Joyce Berger	1855 Chalk Hill Court Road	Reno	NV	89510	N3469Z

Account Dates



Account Dates

Account

	Date		By
Processed On:	09/11/2017	jtayl	JUSTIN TAYLOR
Billed by Treas:		edec	EDEC
Sent to Treas:	11/01/2017	< None >	

Return

	Date	By
Notice Date:	08/08/2017	< None >
Second Notice:		< None >
Final Notice:	08/31/2017	

Extension Request

Request Rec.:		Additional Ext:	
Determination:	< None >	Determination:	< None >
Ext. Due Date:		Addl Ext.Due:	

Additional Information

Requested:	
Requested By:	
Received:	
Determination:	< None >
Notice Resent:	

Survey

Insp:	
Note:	

Penalty Return

Notification Date:	
Waiver Deadline:	
eDec Import Date:	09/08/2017
Determination:	< None >
Letter Date:	
Protest Deadline:	

Notification Date:	
Waiver Deadline:	
Waiver Req.:	
Determination:	< None >
Letter Date:	
Protest Deadline:	

OFFICE OF WASHOE COUNTY ASSESSOR - eDec 2017

Dec Line Item Data

5100984	View Assets	Valuation Summary 2017
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Date	Account	Tax District	Fiscal Year
02/06/2018	5100984	1000	2017

Billing Address

DOWTY CAPITAL GROUP LLC, BRET L DOWTY PO BOX 102 MCDERMITT NV 89421	Aircraft Location: Malhuer, Oregon 2002 CIRRUS DESIGN CORP Tail No: N910JR Phone No:
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Contact Information

Owner Name	DOWTY CAPITAL GROUP LLC, BRET L DOWTY	Address 1	PO Box 102
Preparer Name	Bret Dowty		
Preparer Title	Owner	City State Zip	McDermitt NV 89421
Company Name		Contact Phone	7757458198
Contact Email	bret@iridimconsultingllc.com	Contact Fax	None

Aircraft

No.	Year of Manufacture	Make	Model	Tail Number	Serial #	Year Acquired	Purchase Price	Current Location of Aircraft
1	2002	CIRRUS DESIGN CORP	SR22	N910JR	0142	2004	\$ 250,000	Malhuer, Oregon
Orig							\$ 0	

Personal Property Declaration

Taxpayer comments

Aircraft registration is current in the State of Oregon and is based at 26U

IRIDIUM CONSULTING, LLC

Business Entity Information

Status:	Active	File Date:	3/5/2009
Type:	Domestic Limited-Liability Company	Entity Number:	E0114702009-4
Qualifying State:	NV	List of Officers Due:	3/31/2018
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20091391147	Business License Exp:	3/31/2018

Additional Information

Central Index Key:	
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Registered Agent Information

Name:	BRET DOWTY	Address 1:	8700 TECHNOLOGY WAY
Address 2:		City:	RENO
State:	NV	Zip Code:	89521
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
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No stock records found for this company

Officers

Include Inactive Officers

Manager - BRET DOWTY

Address 1:	P O BOX 102	Address 2:	
City:	MCDERMITT	State:	NV
Zip Code:	89421	Country:	USA
Status:	Active	Email:	

Manager - COLE DOWTY

Address 1:	2964 SILVERADO CREEK DR	Address 2:	
City:	RENO	State:	NV
Zip Code:	89523	Country:	USA
Status:	Active	Email:	

Actions\Amendments

Action Type:	Articles of Organization		
Document Number:	00002209135-62	# of Pages:	1
File Date:	3/5/2009	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20090799980-63	# of Pages:	1
File Date:	11/6/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100201581-10	# of Pages:	1
File Date:	3/30/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110164086-39	# of Pages:	1
File Date:	3/3/2011	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120177790-56	# of Pages:	1
File Date:	3/13/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130293667-39	# of Pages:	1
File Date:	5/1/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140193835-76	# of Pages:	1
File Date:	3/17/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150147323-38	# of Pages:	1
File Date:	3/31/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160099657-55	# of Pages:	1
File Date:	3/2/2016	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20170128375-96	# of Pages:	1
File Date:	3/26/2017	Effective Date:	
(No notes for this action)			

BRET DOWTY



Over 30 years in the Construction and Real estate business

The last 21 years in the multi-residential game as Senior Vice President of Construction Operations for Pacific West Companies. Bret has completed nearly ten thousand units over that time span consisting of for rent and for sale product. Bret was instrumental in creating processes in risk / time management systems, and construction management systems that enabled build times never before accomplished. With Bret's oversight quality control and quality assurance processes were developed to reduce litigation and customer service costs to a minimum level that few real estate companies experience.

I have owned and operate a General Contracting Construction Company since 1982. The focus of that original company has been high end Custom Homes and Commercial projects in the Reno/Lake Tahoe area. I started the business after studies in Construction Management at the University Nevada Reno and working in the Construction Trades.

I currently hold an Instrument Rating Pilots License with a Commercial Medical Certificate. Owning an airplane gives me and the team a mobility advantage.

The newest, latest and greatest technology is and has always been Bret's sought and taught mantra.

Taylor, Justin

From: Taylor, Justin
Sent: Tuesday, January 02, 2018 8:01 AM
To: BRET@IRIDIUMCONSULTINGLLC.COM
Subject: 910jr

Bret,

When you get a moment would you send the flight logs from June, 2017 thru today. We will use this to determine taxable situs for the aircraft.

Justin Taylor
Washoe County Assessors Office
Personal Property Auditor – Appraiser
775-328-2229
jutaylor@washoecounty.us



LCB File No. R019-17

Sec. 28. 1. Taxable situs of an aircraft is established in a jurisdiction based on the quantity, nature, and intent of its physical presence within the jurisdiction. Physical presence must be of a permanent nature, sufficient to afford the opportunities, benefits, and protection of the taxing jurisdiction to the aircraft. The quantum of contact of the aircraft with a jurisdiction sufficient to establish taxable situs is a question of fact based on any of the following measures, without limitation:

(a) The aircraft is used habitually in the jurisdiction, whether on a regular or irregular basis;

(b) The aircraft is habitually kept, maintained, and hangared at the location when not in use; or

(c) Property taxes have been paid to the jurisdiction.

LCB File No. R019-17

Sec. 30. 1. *If an aircraft has acquired taxable situs in Nevada and outside Nevada, the property owner may claim the taxable value of an aircraft is subject to allocation. The property owner has the burden of proving taxable situs outside Nevada has been acquired. The burden is met by providing sufficient information to satisfy the requirements of Section 28. Such information includes, without limitation:*

(a) Records kept in the normal course of business, such as mileage, flight, or maintenance logs and hangar or tie-down receipts that indicate where the aircraft has traveled, how long it was located at each destination, and the purpose of its location at each destination;

(b) Actual tax bills or notices of appraisal or assessment from another jurisdiction; or

(c) Reports filed with state or national agencies that indicate where the aircraft has traveled, how long it was located at destination, and the purpose of its location at each destination.



Line Number	Note	User ID	Date
1	PETITION SCANNED INTO APPXTENDER, ORIG TO MES	lsato	01/16/2018
2	CBE PETITION DOWNLOADED 12-22-2017	dpestoni	01/03/2018
3	BRET DOWTY CALLED STATING HE HAS NOT HEARD FROM AN APPRAISER STILL. HE STATED THAT HIS AIRCRAFT IS TRANSIENT AND HE RENTED HANGER SPACE HERE BUT DOES NOT BELEIVE THAT QUALIFYS TO TAX HIS AIRCRAFT. HE ALSO STATED THAT HE THINKS THAT SINCE HE HAS NOT RECIVED A CALL BACK HE NEEDS TO FIGHT BILL. NO PP APPRAISERS ARE HERE TO TRANSFER HIM TO TO SPEAK TO. I DID ADVIZE HIM THAT HE MAY APPEAL AND THAT APPEALS ARE DUE IN OUR OFFICE BY JANUARY 15TH. I HELPED HIM LOCATE THE FORM ON OUT WEB SITE.	krollison	12/22/2017
4	BRET DOWTY CALLED, HAS NOT HEARD FROM AN APPRAISER. ADVISD FORMAL APPEAL DUE DATE 1/15. TRSFR TO JUSTINS PHONE TO LEAVE VM.	lsato	12/12/2017
5	CORRECT EMAIL IS BRET@IRIDIUMCONSULTINGLLC.COM	lsato	11/21/2017
6	BRET DOWTY CALLED TO ASK WHY ASSESSED IN WASHOE. SAYS A/C HERE ENOUGH FOR HIM TO LEASE HANGAR SPACE, BUT DOESN'T CONSIDER IT BASED HERE AS IT'S REGISTERED IN OREGON. EMAILD MARK & JUSTIN TO RESPOND. CALLED BACK/LFT VM FOR BRET ADVISING FORMAL APPEAL DUE DATE JAN 15, CBE PETITION ON OUR WEBSITE, TO CALL ME IF HE NEEDS ASSISTANCE WITH THAT	lsato	11/21/2017
7	MARKED FOR POSSIBLE SUPP	mstafford	10/11/2017
8	AIRCRAFT REGISTRATION IS CURRENT IN THE STATE OF OREGON AND IS BASED AT 26U	EDEC TP COMMENT	09/08/2017
9	REOPEN ACCT. APPEARS ON RTAA HANGAR LIST. FLT TRCKR SHOWS RENO ACTIVITY 7/21/17, 7/23/17	lsato	07/25/2017
10	05 C08		
11	9/27/07		
12	RECD 6/20/08		
13	BASED IN OR PER REG COPY, RECD 6/20/08		

FAA REGISTRY

N-Number Inquiry Results

N910JR is Assigned

Aircraft Description

Serial Number	0142	Status	Valid
Manufacturer Name	CIRRUS DESIGN CORP	Certificate Issue Date	03/13/2013
Model	SR22	Expiration Date	03/31/2019
Type Aircraft	Fixed Wing Single-Engine	Type Engine	Reciprocating
Pending Number Change	None	Dealer	No
Date Change Authorized	None	Mode S Code (base 8 / oct)	53113603
MFR Year	2002	Mode S Code (base 16 / hex)	AC9783
Type Registration	Corporation	Fractional Owner	NO

Registered Owner

Name	DOWTY CAPITAL GROUP LLC		
Street	PO BOX 102		
City	MC DERMITT	State	NEVADA
County	HUMBOLDT	Zip Code	89421-0102
Country	UNITED STATES		

Airworthiness

Engine Manufacturer	CONT MOTOR	Classification	Standard
Engine Model	IO-550 SERIES	Category	Normal
A/W Date	01/28/2002		

The information contained in this record should be the most current Airworthiness information available in the historical aircraft record. However, this data alone does not provide the basis for a determination regarding the airworthiness of an aircraft or the current aircraft configuration. For specific information, you may request a copy of the aircraft record at <http://aircraft.faa.gov/e.gov/ND/>

Other Owner Names

None

Temporary Certificates

None

Fuel Modifications

None



N910JR

ESTIMATED ARRIVAL
[learn more](#)

NOT YOUR FLIGHT? [N910JR flight schedule](#)



SCK
STOCKTON, CA
MONDAY 23-OCT-2017
10:21AM PDT

RNO
RENO, NV
MONDAY 23-OCT-2017
11:10AM PDT

49m total flight time

TODAYS

CD Rates

30 Year Fixed 3.84 % APR	15 Year Fixed 3.17 % APR	1 Year CD 1.65 % APR
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[Calculate Your Savings](#)

[Get Notifications](#)

Flight Details

[View track log](#)

[All flights between SCK and RNO](#)

FLIGHT TIMES		
	Takeoff	Landing
Actual	10:21AM PDT	11:10AM PDT <i>estimated arrival time</i>
Scheduled	10:21AM PDT	

AIRCRAFT INFORMATION	
Tail Number	N910JR · Registration
Owner	DOWTY CAPITAL GROUP LLC
Aircraft Type	

AircraftBluebook



World's Leading Authority Since 1952

AB 170901

YR	MODEL	SERIAL NUMBER SERIES	FACTORY NEW LIST		AVG. RETAIL	AVG. WHOLE-SALE	TREND	ENGINE (s) Takeoff Power	Avg O'haul \$ Installed	TBO Eng Hr	Max Sts	APPRAISAL POINTS
			\$ Standard	\$ Avg Equip								
CESSNA 140 & 120 (Sgl piston-eng, conv fixed gear)			BASE AVG = 90-channel com • full panel • lights & beacon • 900 SMOH • AFTT +/- 10% of avg • compression 85% of new • orig logs • good ext & interior • no DH • 6-mo annual • ADs complied									
46	120	8310 § 15075	3,245	3,945	15,250*	11,600	No Change	Cont 85hp • C-85-12	16,000	1800	2	Same as 140 except no flaps • deduct \$348 if no elec sys
46	140	8001 § 11846	3,345	4,795	15,500*	11,800	No Change	Cont 85hp • C-85-12	16,000	1800	2	Fabric wing • floats opt elec sys • metal fuselage
47	140	11847 § 14370	N/A	N/A	15,750*	12,000	No Change	Cont 85hp • C-85-12	16,000	1800	2	
48	140	14371 § 15075	N/A	N/A	16,000*	12,200	No Change	Cont 85hp • C-85-12	16,000	1800	2	
49	140 A	15200 § 15344	3,695	5,210	16,250*	12,400	No Change	Cont 90hp • C-90-12F	16,000	1800	2	Metal wing • controllable prop opt
50	140 A	15345 § 15724	N/A	N/A	16,500*	12,600	No Change	Cont 90hp • C-90-12F	16,000	1800	2	
Add for - lo eng \$8.88 hr • Auto fuel STC: see EAA, pg C-2 • *Price varies due to quality of restoration.												
CHAMPION (See American Champion)												
CHRISTEN HUSKY (See Aviat)												
CIRRUS SR22 (Sgl piston-eng, fixed tri-gear)			BASE AVG = Dual nav-com • Dual Garmin GNS 430 • MFD • G/S • mkr beacon • xpdr • all pre-select • EHSI • airframe parachute • electric systems • dual alternator/ battery • noise cancelling power jacks • leather • 3-blade prop • 1000 SMOH • AFTT +/- 10% avg • compression 85% of new • orig logs • exc paint & interior • no DH • 6-mo annual • ADs complied									
01	SR22	0002 § 0134	276,600	294,700	130,000	107,000	No Change	Cont 310hp • IO-550-N	33,000	2000	4	Prcd w/configuration B
02	SR22	0135 § -434	289,400	307,500	140,000	116,000	No Change	Cont 310hp • IO-550-N	33,000	2000	4	Prcd w/configuration B
03	SR22	0435 § -791	289,400	307,500	150,000	125,000	No Change	Cont 310hp • IO-550-N	33,000	2000	4	Prcd w/configuration B
Recent ADs: 07-4-19 • 07-14-3 • 08-3-16												