



16713/5/2
July 15, 2026

Gregory Moore
Amooring L.L.C.
1220 Rosecrans St. PMB 939
San Diego, CA 92106

Dear Mr. Moore:

This letter is in response to your request for a New Vessel Determination pursuant to 46 C.F.R. § 67.175 for vessel Model M2-60 (O/N 1022105). While build information for the subject vessel documents a build completion date of 1994, your submissions assert that the vessel sunk at dock for 4 hours, and subsequent work rehabilitating the vessel after salvage purchase in March of 2013 supports a determination that the vessel is “new” within the meaning of 46 C.F.R. § 67.3.

On or about January 12, 2026, and in response to a deficiency letter issued by NVDC, you submitted a Statement of Work for the subject vessel, detailing how the vessel came to be rehabilitated, and what components of the vessel were replaced or overhauled as part of the project. New construction included:

- Aft entry door;
- All interior wood and cabin doors made new;
- Windows changed from frame sliding to frameless and all new glass made;
- Steps built in to allow access to flybridge without ladder;
- New swim step made;
- New flybridge top made;
- New bow thruster installed and bow thruster tube installed;
- Doubled the horsepower changing MTU 183 300hp for yr. 2023 700HP Cummins sister engines and added new Twin disc transmissions;
- Anchor windlass system was doubled in size and capacity and chain added;
- Boat Davit disassembled and renewed;
- All hatches and deck hatches are new;
- New steps manufactured for engine room entry, battery room;
- Old flybridge dash cut out, new large helm dash made;
- New handrails made for main deck, swim step, and steps;
- New engines and generators with new risers, exhaust, plumbing, and mounts;
- Battery room and laundry room constructed forward of engine room. Removed all batteries from eng. Room, built a spot to do laundry, Central DC and Vacuum;
- Walls, floors, cabinet doors, shelves, wood handrails, trim new, vents, drawer faces, cabinetry, hardware;

- Complete new overhead system installed with frameless removable headliner;
- 100% new systems, machinery and electronics and sensors;
- New alarm system designed and installed, 100% new electrical and wiring devices. New camera and modern sat coms, with new interior coms;
- New central vacuum system added;
- All new pumps and plumbing systems, steering lines, hydraulics, pumps;
- All new HVAC units, controls, vents, returns, and ducting;
- All new fabrics and foam, hardware, hinges, latches, vents, mirrors;
- Engine room vents and air intakes, fire systems and blowers new; and
- Rub rail system and port lights new, all windows and frames new.

Components that were kept and reused, to include components renewed to like new, are as follows:

- Hull bottom and sides, cabin side hulls;
- Glassed-in integral fuel, holding, and water tanks that were reworked to re-fiberglass insides, gelcoat inside, and made tops covers for;
- Reused shafts and propellers until sea trialed and then will re-prop for engines that have double the horsepower; and
- Flybridge top remade and stainless tubing and tuna tower stainless tubing was removed and polished.

Consistent with routine NVDC practice, your new vessel determination request, submissions, and correspondence were forwarded to our counterparts in the naval architectural division for review and input. After review, the naval architectural determined that there is “no unambiguous technical basis for [it] to make a recommendation,” observing that 46 C.F.R. § 67.175 does not prescribe any amount of the original vessel material that must be retained when making a “new vessel determination” thereto, correctly noting that decision-making authority resides with the NVDC Director. However, the naval architectural division did provide the following observations upon review of your submissions, photographs, and correspondence:

- The parts of the original “existing” vessel that were used in the rebuilt vessel are its hull and cabin structure;
- The extent to which the hull and cabin structure were “torn down” is that everything was torn down to the bare hull; and
- Apart from the hull, everything else installed on the vessel is new.

The standard which is applied in determinations as to whether a “new vessel” has been created or, to the contrary, whether an older and existing vessel has simply been rebuilt, is found at 46 C.F.R. § 67.3, which defines “new vessel” as:

- (1) The hull and superstructure of which are constructed entirely of new material; or
- (2) Which is constructed using structural parts of an existing vessel, which parts have been torn down so that they are no longer advanced to a degree which would commit them to use in the building of a vessel.

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Here, both the Statement of Work provided in support of your requested new vessel determination as well as the naval architecture division's observations upon review of your supporting material acknowledge that the original hull provided the foundation for the vessel overhaul. Therefore, the vessel fails to meet definition 1 of 46 C.F.R. § 67.3, as the hull was not constructed of entirely new material.

Applying the test of the second definition, the vessel again fails to satisfy the new vessel criteria. Specifically, the hull, which is by all accounts the only remaining major component of the original vessel, was not torn down so that the hull "was no longer advanced to a degree which would commit [the hull] to use in the building of a vessel"; indeed, it would appear that the entire purpose of the project was to rebuild around the original hull, rather than compile component parts of a new hull, or otherwise design the project around a different hull (see *Aquarius Marine Co. v. Pena*, 64 F.3d 82 (2d Cir. 1995), citing to *The Grace Meade*, 25 F. Cas. 1387 (E.D. Va. 1876), in which the Court held that "[W]here the keel, stem, and stern-posts and ribs of an old vessel, without being broken up and forming an intact frame, are built upon as a skeleton, the case is one of an old vessel rebuilt, and not of a new vessel.... [I]f any considerable part of the hull and skeleton of an old vessel in its intact condition, without being broken up, is built upon, the law holds that in such a case it is the old vessel rebuilt, and not a new vessel.")

Therefore, based on our review, and in accordance with 46 C.F.R. § 67.3, it is my determination that the vessel Model M2-60 (O/N 1022105) does not meet the definition of a new vessel, and is the vessel originally completed in 1994, albeit significantly rebuilt. Pursuant to 46 C.F.R. § 67.12, you may appeal this decision in writing within thirty (30) days (see 46 C.F.R. Subpart 1.03).

Sincerely,



Christina G. Washburn
Director