

VIA E-MAIL lgaleagle1@aol.com
AND VIA CERTIFIED MAIL NUMBER

February 6, 2015

Joseph R. Polito Jr., Esq.
Law Offices of Joseph R. Polito Jr., Esquire
127 E. Chestnut Street
West Chester, PA 19380

RE: Country Chrysler Dodge Jeep, Inc. v.
File No. [REDACTED]

Dear Mr. Polito:

Reference is made to your letter of February 26, 2015, copy of which is forwarded herewith for your easy reference. (**Exhibit A**).

I am also forwarding copy of my letter of May 16, 2014, to Mr. Scott McCulloch as evidence of the situation that prevails to date regarding our 2004 Dodge Ram, which has repeatedly been brought to the attention of your client (**Exhibit B**), received by McCulloch on May 19, 2014 (**Exhibit C**). The damages and expenses suffered by myself and my family greatly exceed the amount in controversy. Moreover, it is also clear that Country Chrysler Jeep, Inc. has established minimum contacts with the Commonwealth of Puerto Rico, which includes your letter, and that our damages will increase by the filing of a frivolous complaint by your client and the ensuing damage to our credit, which we are not waiving. I advise you that if our controversies with your client are not satisfactorily resolved, I will be filing the corresponding complaint with the United States District Court for the District of Puerto Rico.

Moreover, I will also be contacting the National Transportation Safety Board, Chrysler Motors Corporation ("Chrysler") and Mayer Brown, counsel for Chrysler and with which firm I have a very long standing relationship.

Consequently, in order to avoid further expenses and litigation, I invite you to suggest to your client to attempt to resolve this matter extra-judicially, correcting the defects and misgivings still being experienced by our stated vehicle and adjusting the charges relative thereto accordingly.

Letter to Joseph R. Polito, Jr. Esq.
Re: Country Chrysler Dodge Jeep, Inc. v. [REDACTED]

March 5, 2015

Page- 2 -

In passing, I invite you to examine your client's records as to our purchases of at least eight vehicles therefrom, for you to realize that this is not a matter of the \$6,107.39.

Cordially,

[REDACTED]

Enclosures

an

7013 0600 0001 2212 9495

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For delivery information visit our website at www.usps.com	
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Street, Apt. No. or PO Box No	
City, State, ZIP	

PS Form 3800

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. - Print your name and address on the reverse so that we can return the card to you. - Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature X ☐ Agent ☐ Addressee	
1. Article Addressed to: Joseph R. Polito Jr., Esq. Law Offices of Joseph R. Polito Jr., Esquire 127 E. Chestnut Street West Chester, PA 19380		B. Received by (Printed Name) C. Date of Delivery	
2. Article Number (Transfer from service label) [REDACTED]		D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No	
3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☒ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D.		4. Restricted Delivery? (Extra Fee) ☐ Yes	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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8:52A

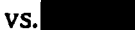
LAW OFFICES

*Joseph R. Polito Jr., Esquire*127 E. Chestnut Street
West Chester, PA 19380

February 26, 2015

Phone: 610.431.3090

E-Mail: Lgaleagle1@aol.com


San Juan, PR Re: Country Chrysler Dodge Jeep, Inc.
vs. 
Our File No. Dear 

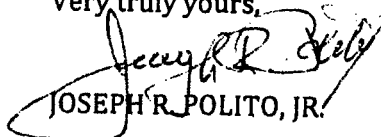
This letter will serve to advise you that this matter has been referred to me as Attorney for Country Chrysler Dodge Jeep, Inc. for purposes of seeking collection of a balance due and owing in the amount of \$6,107.39 on our client's account number  for various repairs on vehicles owned by yourself and your ex-wife, , on invoices from September 23rd, 2013 through May 8th, 2014.

It is my understanding that you had once promised to pay the balance at the rate of \$1,000.00 per month, but that there has been no payment received since November of 2014.

I am writing to you asking you to renew payments making the payment payable to Country Chrysler Dodge Jeep, Inc. referring to your account number  and send those payments to my attention at the address set forth above. I will expect to hear from you within two weeks of the date of this communication. If I do not hear from you within that period of time, I will assume litigation is necessitated which will, of course, incur for you additional costs and expenses pertaining to filing fees, interest, and attorney's fees.

Since some of the vehicles were titled to your ex-wife, I am sending copy of this communication to her attention. Awaiting reply.

Very truly yours,


JOSEPH R. POLITO, JR.

JRPjr/mc

Cc: Fax to Country Chrysler
ATTN: Kathy Brooks
610-932-0715

San Juan, PR

CERTIFIED MAIL NUMBER 7013 0600 0001 2220 1078
And VIA E-MAIL servicemgr@zoominternet.net

May 16, 2014

Mr. Scott McCulloch
Service Manager
Jeff D'Ambrosio
Country Chrysler-Dodge-Jeep
2158 Baltimore Pike
Oxford, PA 19363

Re: [REDACTED]
2004 Dodge Ram

Dear Mr. McCulloch:

For many years we have been customers of Jeff D'Ambrosio Dodge & Jeep, purchasing at least seven (7) different vehicles therefrom.

One of those vehicles is our 2004 Dodge Ram, as to which I invite you to examine its expenses and irregular service record, which has cost us a substantial amount of money. The latest episodes as to this vehicle is a non-constant exaggerated shakiness or trembling and self-braking, with a loss of power and an inability to be controlled, both when hauling horses and without any tow, putting at risk the lives of its passengers, as well as that of the live-cargo in those instances when horses are being towed in our gooseneck unit.

As your service records would reveal, the aforesaid has been brought to the attention of your department, which to date has been unable to experience the aforesaid episodes and thus unable to find out the source of the problem. Since according to Mr. Martin Lawrence II, the only manner to determine what is causing this untenable situation is by experiencing its happening, we have agreed to next Monday take the truck to your service department and leave it there for as long as it takes in order that the situation can be remedied.

The latest episode took place this morning when one of our employees was on his way to Parx Racing without any cargo to pick-up a check. He had to return to our farm to exchange vehicles.

Letter to Mr. McCulloch
Re: 2004 Dodge Ram

May 16, 2014
Page-2-

Your prompt attention to this matter will be appreciated, since I am very concerned about the safety and welfare of my family and employees.

Cordially,

[REDACTED]

an

[REDACTED]

From: [REDACTED]
Sent: Friday, May 16, 2014 12:19 PM
To: 'servicemgr@zoominternet.net'
Cc: [REDACTED]
Subject: 2004 Dodge Ram
Attachments: Letter Scott McCullough re 2004 Dodge Ram.pdf

Dear Mr. McCullough:

Please see the letter enclosed as to the vehicle of reference.

Cordially,

[REDACTED]

San Juan, PR [REDACTED]

[REDACTED]

"Do not go where the path may lead, go instead where there is no path and leave a trail."

 Please consider the environment before printing this e-mail.

CONFIDENTIALITY NOTE: This communication contains information belonging to [REDACTED] which is confidential and/or legally privileged. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of said information is strictly prohibited. If you have received this communication by error, please delete it from your computer and notify us immediately.

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Total Postage & Fees	\$ 06.49	05/16/2014

Mr. Scott McCulloch
 Service Manager
 Jeff D'Ambrosio
 Country Chrysler-Dodge-Jeep
 2158 Baltimore Pike
 Oxford, PA 19363

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SENDER: COMPLETE THIS SECTION

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1. Article Addressed to:

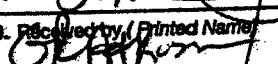
Mr. Scott McCulloch
 Service Manager
 Jeff D'Ambrosio
 Country Chrysler-Dodge-Jeep
 2158 Baltimore Pike
 Oxford, PA 19363

2. Article Number

(Transfer from service label)

PS Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

A. Signature  ☐ Agent
☒ Addressee
 B. Received by (Printed Name) 
 C. Date of Delivery 5-19-14
 D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

Domestic Return Receipt

102596-02-11-1548

From: Scott McCulloch <servicemgr@zoominternet.net>
Sent: Friday, May 16, 2014 12:49 PM
To: [REDACTED]
Subject: Service appt.

[REDACTED]

I have received your email and understand your concern. As you know we have never been able to get the truck act up on us while we are test driving it. In the past we were told that the condition was only happening when a trailer was hooked to it which led us to believe that it could possibly be a problem with the trailer. You stated there was no cargo the latest time this happened but does that mean there was no trailer connected to the truck at all or that it was hooked to an empty trailer? We will be glad to check the truck over again for you when you drop it off on Monday and I would also suggest that you leave it for an extended period of time so that we can have a technician drive it regularly to attempt to duplicate the condition.

Scott McCulloch /

Service Manager / Country CDJR

[REDACTED]

From: [REDACTED]
Sent: Sunday, March 22, 2015 7:59 PM
To: lgaleagle1@aol.com
Cc: [REDACTED]
Subject: Country Chrysler Dodge Jeep, Inc. v. [REDACTED]

Dear Mr. Polito:

Aside of the error in the date of my previous letter, as indicated therein the situation affecting our 2004 Dodge prevails to date, and as will be indicated hereinafter exists since before 2009, since your letter seems to limit the problem to two self-serving repair orders, for alleged completed repairs, respectively in November 29, 2013 and August 5, 2014, which didn't correct the dangerous situation to which members of my family, our employees and thoroughbreds have been exposed.

Before doing so, I would like to clarify that I don't have a business office in Pennsylvania, my only office being in the Commonwealth of Puerto Rico. The address in Pennsylvania to which you forwarded the copy of your correspondence is a residential one where [REDACTED] one of my daughters and grandchildren reside. I don't reside in Pennsylvania. My domicile has always been in Puerto Rico.

The defects affecting the vehicle didn't commence on November 29, 2013, but since January 25, 2006 when the vehicle first showed lack of power, as reflected by the corresponding repair order. The situation was exacerbated by a required transmission replacement completed on May 21, 2009 (Inv. No. [REDACTED]). The two repair orders to which you refer are only evidence of the trial and error approach undertaken by your client in ineffectively attempting to resolve a problem which has been worsened by time.

As you will be able to see from Repair Order [REDACTED] due to the re-currency of the problem the vehicle was in your client's repair shop from May 19, 2014 to August 5, 2014 (almost 3 months) whose representatives could not find its cause recurring to speculation and again trial and error.

Your client's records are silent after August 5, 2014, because after the delivery of the vehicle, the problem became again evident, with and without hauling a trailer, and upon [REDACTED] contacting Mr. Martin Lawrence, your client's service advisor, he indicated to her that your client's service personnel could not find the problem and she opted to not to take the vehicle back to your client to preclude another lengthy retention and instead decided to use the vehicle internally in our farm, to our detriment and expense, as since then we have been limited to the sole use of our 2011 Dodge Ram, also purchased from your client, to transport our thoroughbreds to Fair Hill Training Center and to the racetracks for racing.

Your examination of the multiple Repair Orders for the vehicle in question show that we have spent over \$27,000 in repairs for a vehicle which since 2009 has no been able to be utilized safely and properly.

My settlement proposal consists of your client replacing the vehicle with a similar one, which can be utilized for the purposes for which the one in question was purchased, and the elimination of the \$6,107.39 charge.

Please be advised that this letter consists of a settlement proposal, subject to Federal Rule of Evidence 408, and can't be used for any other purpose.

Cordially,

[REDACTED]

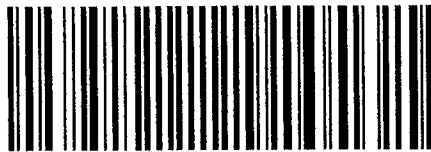
Sent from my BlackBerry 10 smartphone.

San Juan, PR

CRS

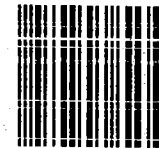
W48-226

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7013 0600 0001 2212 9617

Mr. Frank Borris
Office of Defects Investigation
National Highway Traffic Safety
Administration
1200 New Jersey Avenue, SE
West Building, Washington DC 20590



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