

 U.S. Department of Transportation National Highway Traffic Safety Administration		DOT Auto Safety Hotline		FOR AGENCY USE ONLY 100148	
		Vehicle Owner's Questionnaire To Report Vehicle Safety Defects 1-888-DASH-2-DOT (1-888-327-4236) INTERNET: www.nhtsa.dot.gov/hotline		Date Received 31-JAN-2019 MAY 21 2019	
OWNER INFORMATION (Type or Print) Name [REDACTED] Address [REDACTED] (change) City VAN NUYS State CA Zip Code [REDACTED]				Repository ☐	
				Reference No. 11173289	
The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine uses described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).				Daytime Telephone Number [REDACTED]	
				E-mail Address [REDACTED]	
				Evening Telephone Number [REDACTED]	
VEHICLE INFORMATION					
17 digit Vehicle Identification Number Located at bottom of windshield on driver's side 1FTYR10C4XP [REDACTED]			Make FORD	Model RANGER	Model Year 1999
Date Purchased		Dealer's Name and Telephone Number		Engine: No: Cylinders	Fuel Type:
Original Owner ☐		Dealer's City		State	Zip Code
Transmission Type ☐ Antilock Brakes ☐ Cruise Control		Powertrain		Multiple Failure:	Incident Date(s) 15-DEC-2018
FAILED COMPONENT(S)/PART(S) INFORMATION					
Vehicle Component Code: 060000 ENGINE (PWS)				Failure Mileage 200000	Failure Speed 35
ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE					
Tire Make		Tire Model (Name or Number)		Tire Size (Example P215/65R15)	
DOT No. (Example: DOTM19ABC036)		☐ Original Equipment ☐ Prior Repair		Failure Location:	
Tire Component Code				Tire Failure Type:	
ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE					
Make:		Date Manufactured:		Model No./Name:	
Seat Type:		Installation System:			
Child Seat Component Code:		Failed Part:			
APPLICABLE INCIDENT INFORMATION (Please describe in detail the incident(s), failure(s), crash(es), and injury(ies).)					
Crash ☐ Yes ☒ No		Fire ☒ Yes ☐ No		Number of Persons Injured	
				Number of Deaths	
				Reported to Police N	
Narrative Description of Incident(s), Crash(es), and Injury(ies). Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e., parts repaired or replaced (and if old part is available).					
TL* THE CONTACT OWNED A 1999 FORD RANGER. WHILE DRIVING 35 MPH, THE CONTACT NOTICED SMOKE UNDER THE HOOD AND FLAMES SURROUNDING THE ENGINE. THE FIRE DEPARTMENT EXTINGUISHED THE FIRE. A POLICE REPORT WAS NOT FILED. THE CAUSE OF THE FIRE WAS UNKNOWN. THERE WERE NO INJURIES SUSTAINED. THE VEHICLE WAS NOT TOWED AND WAS DEEMED A TOTAL LOSS. THE DEALER WAS NOT CONTACTED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND OPENED A CASE. THE FAILURE MILEAGE WAS APPROXIMATELY 200,000.					
① # 11173289 ② # 11173291 [REDACTED] CANONIA PARK, CA					
Include, if available: Police/Fire Department Report, Photos, and Repair Invoice. ATTACH ADDITIONAL SHEETS IF NECESSARY.					
The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.					

1 [REDACTED] (Not An Attorney) -

2 California Bar id# [REDACTED]

3 American Bar Association-id [REDACTED]

4 Canoga Park, CA [REDACTED]

5 Telephone number [REDACTED]

6 Email: [REDACTED]

7 SUPERIOR COURT FOR THE STATE OF CALIFORNIA

8 COUNTY OF LOS ANGELES

9
10
11 [REDACTED]
12 Plaintiff)

CASE#; [REDACTED]

FIRST AMENDED COMPLAINT

13 Vs)

14 1) NEGLIGENCE

15 2) BREACH OF WARRANTY (IMPLIED/EXPRESSED)

16 Ford Motor Company)

3) FRAUD

Does 1 to 50 inclusive)

4) MISREPRESENTATION

5) VIOLATION OF MAGNUSON-MOSS WARRANTY ACT

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18
19 COMES NOW PLAINTIFF AND ALLEGES AS FOLLOWS.

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21 PARTIES AND JURISDICTION

22 PLAINTIFF IS A RESIDENT OF CANOGA PARK, CALIFORNIA.

23 DEFENDANT IS AND AT ALL TIMES HEREIN MENTIONED WAS A MICHIGAN CORPORATION WITH ITS
24 PRINCIPLE PLACE OF BUSINESS IN DEARBORN MICHIGAN

25 Jurisdiction over Ford Motor Company entity is proper under California Code of Civil Procedure
26 410.10

27 The Court has general personal jurisdiction over Ford Motor Company because it has had substantial
28 and continues business contacts with California.

FACTUAL ALLEGATIONS

1 Plaintiff had owned 2 Ford Rangers. A 1999 and a 1996 Ford Ranger. Both vehicles caught on fire under
2 the hood and in both cases the vehicles were destroyed. Plaintiff believes that the fires occurred as a
3 result of a manufacturing defects or design defects.

4 The 1999 Ford Ranger was subject of at least 2 recalls for Fire risk. The 1996 was also subject to at
5 least one government recall for fire risk.

6 Government recall id#-07v336000 involved the vehicle speed control. The recall was announced 8-3-
7 2007. The 1999 Ford Ranger was among 3,600,000 which was recalled because the speed control
8 deactivation switch may under certain conditions leak internally and then overheat, smoke and burn.

9 The 1999 Ford Ranger was also the subject of a second recall for fire risk. Government Recall id#-
10 06E056000 was initiated on 6/13/2006. This recall involved 58,000 vehicles. This recall involved the
11 fact that certain fuel filters were defective as installed in the Ford vehicles. Due to incorrect design the
12 quick connector may not fully seat with the interface. Failure of this connection could lead to fuel
13 spillage and source and a fire could occur.

14 The 1996 Ford was subject to government recall id#-09v399000. This recall was initiated on
15 10/13/2009. This recall involved Vehicles equipped with a certain speed control deactivation switch.
16 The SCDS may leak internally and then overheat, smoke, or burn.

17 There are other relevant recalls. Government recall #94v111001 involved 1994 Ford Rangers for fire
18 risk. The 1994 Ford Ranger is very similar to the 1996 and The 1999 Ford Ranger that are the subject of
19 this lawsuit.

20 Plaintiff believes that Ford Motor has not done enough in terms of designing, engineering their
21 products as well as taking responsibility for product defects that occur. Plaintiff had entered the 1999
22 Ford Rangers vin number on Ford website and Ford's website provided the false information that
23 neither truck was subject to recalls. Further, plaintiff was not notified of the recall by the 1999 Ford
24 Ranger even though his vehicle was registered with the Department of Motor vehicles at the time the
25 recalls was announced.

26 Although plaintiff did not own the 1996 Ford Ranger at the time of the relevant recall(for this vehicle).
27 Plaintiff is confident that the 1996 Ford Ranger was not recalled and the necessary repairs were not
28 completed. It is also plaintiff's position that it was Ford's lack of good faith effort in dealing with their
problem vehicles that neither of the vehicles were recalled and repaired.

When plaintiff had mentioned the recall, Ford (and its agents) had summarily claimed (without
investigation) that the recalls did not apply. This conclusion was an attempt to lie and avoid
responsibility for Ford's Failures and shortcomings.

FIRST CAUSE OF ACTION

NEGLIGENCE

1 Plaintiff believes that Ford was negligent in the designing and manufacturing of the two Ford Rangers
2 that plaintiff had owned that both caught on fire. Plaintiff also believe that Ford was negligent in failing
3 to recall the vehicles and make sure the necessary repairs have been completed. It is plaintiffs position
4 that all car manufacturers have a duty to insure that their vehicle are designed and manufactured to
5 drive safely and that the vehicles will not catch on fire(without warning) and burn (possibly to the
6 ground). Car fires put the drivers and passengers at risk of death or great bodily harm. Any vehicle that
7 catches on fire (with a full tank of gas) is nothing less than a large scale bomb. Ford breached that duty
8 by allowing the sales of vehicles with serious fire risk defects.

SECOND CAUSE OF ACTION

BREACH OF WARRANTY

9 Plaintiff believes that Ford had breached express warranty and implied warranty of merchantability by
10 designing and manufacturing vehicles that were prone to catch on fire without warning. Any vehicle
11 that is prone to catch fire and put the driver and passengers at risk of death or great bodily harm could
12 not be fit for the purpose it was intended. That is a fact because if a vehicle is prone to catch fire then it
13 is too dangerous and too flawed to be a practice option for the public's use. Any member of the public
14 that was properly made aware of this flaw would not have chosen a Ford Ranger.

THIRD CAUSE OF ACTION

FRAUD

15 Fraud can be defined as an intentional deception to secure unfair or unlawful gain. It is plaintiff's
16 position that Ford had engaged in fraud by failing to recall vehicles , failing to admit design and
17 manufacturing defects and lying and cheating to plaintiff and to the public at large. Ford can also be
18 guilty of Fraud by their failure to "adhere to strict engineering protocols" to avoid fire risk and then lying
19 in sales and marketing campaigns that there vehicles were quality without flaws.

FOURTH CAUSE OF ACTION

MISREPRESENTATION

21 Misrepresentation can be defined as the action of giving a false or misleading account of the nature of
22 something. Plaintiff believes that Defendants have been guilty of misrepresentation by failing to admit
23 the problems with their vehicles and failing to take responsibility for the defects that have occurred on
24 many Ford Vehicles. Ford has to a large extent denied problems in bad faith and have lied to plaintiff as
25 well as lied to the public. Ford also lied by selling a supposedly "quality vehicle" that contained
26 Serious flaws.

FIFTH CAUSE OF ACTION

(VIOLATION OF 15 U.S.C. 2301)-MAGNUSON-MOSS WARRANTY ACT

1 The Maguson-moss Warratny act was enacted to fix the problems that resulted from manufactures
2 using disclaimers on warranties in an unfair or misleading manner. In this situation plaintiff believes
3 that Ford Motor is attempting to avoid responsibility for designing and manufacturing defective
4 vehicles in an unfair and misleading manner. Thus This federal statute should be utilized to prevent
5 Ford Motor from avoiding liability for their defective vehicles.

6 DEFENDANTS CLAIM THAT PLAINTIFFS CLAIM MAY BE SUBJECT TO DEMURRER

7 Defendants may claim that where a complaint fails to state the facts constituting each cause of action,
8 the compliant is subject to demurrer. This claim is not done in good faith and is based on lies. Even
9 though plaintiffs claim (as presented in the superior court paperwork) is brief, Defendants and their
10 attorneys (at this time) are well aware of the facts and legal theories involved in this superior court
11 complaint. Plaintiff has sent several letters and digital pictures explaining what the compliant is
12 concerning. Further, Defendants should be aware that plaintiff has also filed(two) claims with the
13 Federal Traffic Highway Safety Administrataion regarding this claim. Defendant are aware from several
14 sources what the facts and issues are. Defendants claim of possible demurrer is baseless.

15 PLAINTIFFS CLAIM FOR PUNITVIE DAMAGES

16 Defendants are correct in that section 329(a) of the California civil code, punitive damages may be
17 awarded where it is proven by clear and convincing evidence that the defendant has been guilty of
18 oppression, fraud, or malice. A plaintiff needs to plead specific facts with detail- what the defendant
19 knew about the alleged acts that harmed the plaintiff, how the defendant knew it, and how the
20 defendant consciously disregarded the plaintiff's rights or safety despite this knowledge. Defendant
21 knew that the 1999 Ford Ranger and the 1996 Ranger had fire risk defects because there was at least 2
22 recalls for fire risk that involved the 1999 Ford Ranger. There was at least 1 recall that involved the
23 1996 Ford Ranger for fire risk. Further, there was a recall for 1994 Ford Rangers for fire risk. Ford was
24 well aware of the defect for fire risk for Ford Rangers for models-1994, 1996, 1999. Ford did not notify
25 plaintiff of the recall so that, the needed repairs could be made. Plaintiff vehicle (at all times) was
26 registered with the Dept. of Motor Vehicle and plaintiff was not notified of the fire risk defect and the
27 recall by Ford nor by the dealer that he(the plaintiff) purchased the vehicle from. Further, when
28 plaintiff entered the two ford rangers vin numbers on fords website; Fords website provides the false
information that the 2 vehicle were not subject of any recall.

29 Plaintiff would like to point out all the aspects of how Ford has lied, cheated and acted in a bad faith
30 and in a corrupt manner in these proceedings. Their website provides false information (when the
31 vehicle vin numbers were entered on their website). Ford refused to inspect the vehicle and then later
32 used (their failure to inspect) as an excuse why this claim should be dismissed. Plaintiff had offered to
33 let Ford inspect the vehicle if (they called plaintiff) and set an appointment for inspection. They never
34 complied. Further, Ford (and their agents) summarily denied that the recalls(mentioned by plaintiff)
35 applied to these facts. When plaintiff told Ford (and their agents) that these vehicles were recalled they
36 did not investigate the facts but (in a dishonest and disingenuous manner) said that these recall do not

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apply. They would need to investigate first before making a summary conclusion if they were being honest and acting in good faith.

It does not seem likely that(if plaintiff had been notified of the recall) that Ford and its dealer were going too deal with the fire risk problem.

In conclusion, it seems that clear that large corporate entities such as (and including) Ford Motor Company are only 60 to 65% regulated to the extent they should. They have to(too large extent) avoided liability and responsibility for Negligence, intentional, illegal, and immoral conduct (that is against the public interest) . They get away with too much sin. Ford Motor Company has too many high paid lawyers and lobbyist and to (too large extent) feel that they will not be held accountable for their errors ,illegal conduct , and intentional wrongdoing.

When Ford is negligent, or acts outside of the law or legal parameters (set out by government regulatory agencies) , or acts in a deliberate criminal manner; They will seek to merely blame the (complaining) customer , or the public "INVERTING THE BLAME IS A MASTER STROKE OF PR [REDACTED] (IN MY VIEW)"-JOHN CADOGAN-(AUTOMOTIVE EXPERT)-U-TUBE

Ford Motor Corporation only seeks to do what is honest, correct, legal-(act within the legal parameters set by State and Federal regulatory agencies), moral ethical-- when they deem it to be in their interest. Any action that is right, legal, proper, correct, ethical (but against their corporate interest) will be avoided and not complied with.

PRAYER FOR RELEIF

BY reason of the foregoing, Plaintiff prays for Judgement as follows:

- 1) Damages for 2 destroyed vehicle plus all the costs incurred for repairs , maintenance, parts, and compensation for contents of the vehicles that were destroyed including a laptop computer
- 2) Punitive damages if deemed by The court to apply
- 3) Other relief as deem just and proper

May/7/ 2019

[REDACTED]
California id# [REDACTED]

American Bar Association-id# [REDACTED]

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EXHIBITS

Plaintiff would like to point out news articles on the internet that is relevant to the case at hand
PLEASE REVIEW THE FOLLOWING U-TUBE VIDEOS

- 1) why do so many Ford Vehicles catch fire
- 2) Ford Recalls 2 million F-150s trucks for potential fire risk
- 3) Ford Ranger catches fire at traffic light-fire recall
- 4) Ranger Danger; How Ford fights Fire risk with BS
- 5) Ford F truck fires; Lemon law recall-(same recall as the 1999 Ford Ranger)
- 6) Ford Ranger & Mazada BT-50 Fire Risk safety Recall (class action)
- 7) Ford issues massive pick up truck recall due to block heater Fire Risk
- 8) Two million Ford f-150s recalled due to seatbelt defect and fire risk
- 9) Kuga owners say Ford took too long to launch recall after car fire.
- 10) Busting Ford Rangers science of truck commercial

JOHN CADOGAN-automotive expert-U-TUBE-"Ford is the carmaker most likely to catch on fire"



Defending Liberty
Pursuing Justice

American Bar Association
certifies that



is a Member of this Association which is dedicated to maintaining
the highest professional standards, advancing the administration of justice,
and serving the legal profession and the public.

A handwritten signature in black ink, appearing to read 'H. Thomas Wells Jr.', written over a horizontal line.

H. Thomas Wells Jr.
President

2008

Member Year





THE STATE BAR OF CALIFORNIA

OFFICE OF ADMISSIONS

180 HOWARD STREET • SAN FRANCISCO, CALIFORNIA 94105-1619 • (415) 538-2300
845 S. FIGUEROA STREET • LOS ANGELES, CALIFORNIA 90017-2515 • (213) 765-1500

December 7, 2018

Van Nuys, CA

Canoga Park, CA

RE: APPLICATION TO TAKE THE EXAMINATION

The Office of Admissions' records indicate that your application has been filed and is being processed. The following information references your application:

Examination: February 2019 California Bar Examination
Registration File #: [REDACTED]
Application Number: [REDACTED]
Registration Type: General
Examination Applied For: General Bar Exam
Assigned Test Center: THE PASADENA CENTER-WRITERS

Hotel information is available for most test centers at [REDACTED]

Admittance tickets will be available for printing from your Admissions Status Screen approximately 8 weeks prior to the examination, once the processing of the application is complete and you are found eligible to take the examination. If you have any questions regarding this notice, please contact the Office of Admissions at (213) 765-1500.

If you have an email spam blocker, please also add ticketready@calbar.ca.gov to your contact or safe list. You will receive an email from this email address informing you when you can print your admittance ticket through the Admissions Status screen.

Sincerely,

THE COMMITTEE OF BAR EXAMINERS



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Dear Consumer:

NEF-160

As a follow-up to your report to the Vehicle Safety Hotline (VSH), we have recorded your information on the enclosed Vehicle Owner's Questionnaire (VOQ) form. Please review the form and make changes, additions and corrections as necessary. Additionally, please provide a more detailed description of the failure(s) you reported that you believe relevant to safety. Also, if available, include copies of repair invoices, letters to the manufacturer, or any other document related to the problem(s) you reported. If a crash or fire occurred, include a copy of the police or fire department report.

It is helpful to be as thorough as possible in your report so that our ability to use your report will be maximized. If you do not have the information, it is not necessary to complete all the boxes. However, it is very difficult to identify the scope of a vehicle problem unless the vehicle identification number (VIN) is known. The VIN is located inside the vehicle on the dashboard adjacent to the left (driver's side) of the windshield pillar and on the drivers' door or the driver's door jam. It may also be listed on a dealer repair invoice or your insurance or registration cards. When reporting a tire problem, the brand name, tire line and complete tire size should be included. Be certain to provide the DOT tire identification number. It is usually located near the rim flange of the tire on either side of the tire.

We do not make your personal information (name, address, phone numbers, etc.) available to the general public. However, if we open an investigation that involves your vehicle, we will provide the manufacturer of your vehicle with a complete copy of your report. The information you provide may assist the manufacturer and NHTSA in determining if a safety-related defect exists.

Any information provided is entirely voluntary. There is no consequence or penalty of any kind if you do not wish to provide it. We seek this information to develop both statistical and investigative evidence that will help identify potential safety related problems in vehicles or vehicle equipment, e.g., tires, child safety seats, jacks, etc.

When completed, please fold and staple or tape the form so that the pre-addressed portion of the form is on the outside. If a larger envelope is used, tape the VOQ form to the larger envelope so that the pre-addressed portion of the form is showing.

If further assistance is needed, please contact the VSH at their toll-free number, 1-888-327-4236.

Thank you for your cooperation.

Sincerely,

Randy Reid Chief
Correspondence Research Division
Office of Defects Investigation
Enforcement

Enclosure: VOQ