

To: Beverly Hills BMW
5151 Wilshire Blvd
Los Angeles, CA 90036

3/11/22
Initial complaint sent
2/25/22

CL-11315666-4100

CC: U.S. Department of Transportation
National Highway and Traffic Safety Administration
1200 New Jersey Ave., SE West Building
Washington, DC 20590

Office of the Attorney General
455 Golden Gate Ave #11000
San Francisco, CA 94102

INFORMATION REDACTED PURSUANT TO THE FREEDOM
OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

Settlement Demand

Dear Sirs,

On the morning of February 25, 2020, I [REDACTED] was involved in a head on collision with a tow truck on highway 210 headed east towards Fontana, California. I was driving a 2004 BMW X3 SUV that I purchased from my coworker/friend [REDACTED] for my daughter. I cannot recall the exact speed of impact, however the SUV suffered extensive damage while the tow truck had little to no damage. (see attached photos). If I were to estimate the speed of collision, I

RR

would say roughly 65 mph. The airbag failed to deploy on impact. Later that evening I went to a local clinic to be checked out and I was advised by the MD on duty to go to the emergency room. I went to ER at Cedar Sinai Medical, at the time I was a current employee. I was released, and requested to see my primary care provider. I decided to take a leave of absence which ultimately lead to me resigning from my Critical Care registered nurse position at Cedars Sinai Medical Center where I had been employed for the past 13 years. Which is significant because four months post car accident I had my first seizure, witnessed by my brother [REDACTED] and was unemployed. With that being said my brother, not being a health professional did not recognize at the time I was experiencing a seizure he just felt something was wrong and called the ambulance service. I was taken to Fontana Medical Center and after hours I eventually woke up disoriented but appropriate and more disturbed that I had soiled myself and I left the hospital. Ultimately, chalking whatever my brother witnessed as exhaustion. After months of being unemployed, I started working with FEMA as a travel nurse in the height of the global pandemic. On assignment in Texas, I had two significant medical events that occurred. With that came the realization and diagnosis epilepsy as a result of late stage brain injury due to the airbag failure.

Unfortunately, my late stage brain injury manifest in Grand Mal tonic clinic seizures as well as partial multi focal in nature. I am unable to drive currently under this condition to say the least of my maladies. My family has been a witness to the seizures and has video recorded a few. All of which can be made available to you upon request. Soon after I had the accident I reached out to BMW of North America and corresponded with Michael Pigoncelli, After viewing the photos of the damages to the vehicle, Mr. Pigoncelli stated on the phone, that according to his team of engineers, I did not hit the vehicle high enough to trigger an airbag sensor. I emailed Mr. Pigoncelli a schematic of where the air bag sensors are located on the BMW X3 model. But to no avail, Mr. Pigoncelli refused to put his engineer's statements in writing, and ultimately stopped responding to my communications.

This letter servers as 30 day final demand/attempt to reach a settlement.

I have provided you with evidence to support the fact that BMW of Beverly Hills is solely liable for my head injury suffered, ultimately resulting in epilepsy, that is now with me for life.

The initial airbag was part of the large Takata airbag recall. I have provided along with this letter, a receipt provided to me, by the former owner, of her taking the

vehicle to your facility to have the airbag recall replaced. Also, according to the National Highway Traffic Safety Administration the vehicle's vin number reflects that the airbag recall had been addressed. I have also provided a receipt from a very reputable airbag specialists, who in fact is the golden standard in Los Angeles County. This gentleman, in fact has for the last 20 years been responsible for training the Los Angeles County Fire Department and surrounding areas on airbag safety. I will allow you to interpret his findings, along with photos of how the "replaced" airbag was not even wired correctly, as well as no indicator light on showing the malfunction.

I seek damages in the amount of \$3,500,000. I am a registered critical care nurse who's life has been altered in an imaginable way due to the negligence of BMW of Beverly Hills. This amount reflects the uncertainty of my life, now that I have epilepsy due to traumatic brain injury. Please review the evidence I have provided, I am open to negotiating without involving the judicial system. I must however mention, due to time and cost I have not provided my entire MRI results, only the result page. Keeping in mind the MRI was performed well over a year with epilepsy, which was due to no longer having a full time employment with insurance coverage. If you feel you need more information, I am more than willing

to provide it for you. Please feel free to contact me [REDACTED] within the 30 days of receipt of this demand letter.

I look forward to working with you.

Thank you,

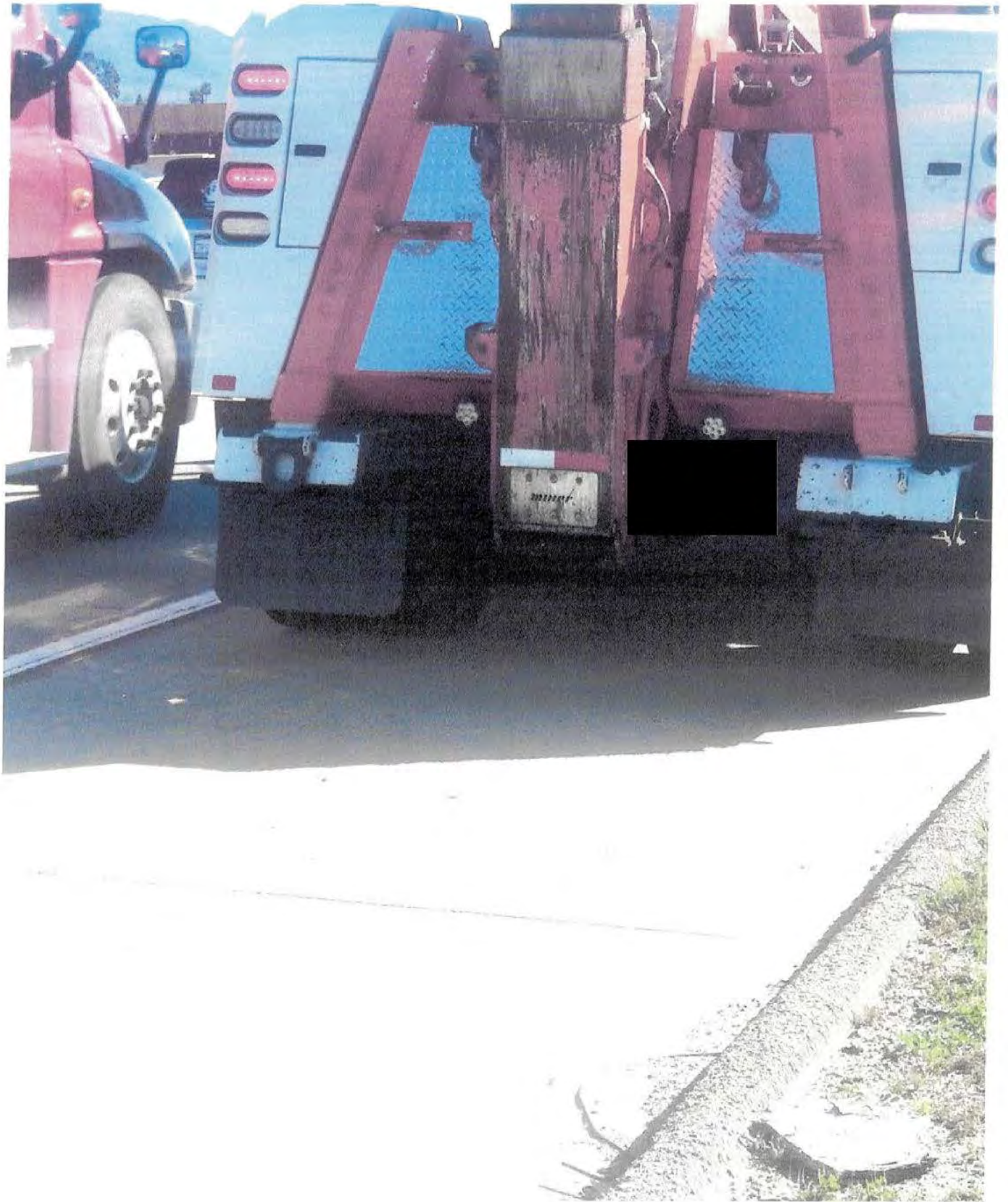
[REDACTED]

Fontana, CA [REDACTED]

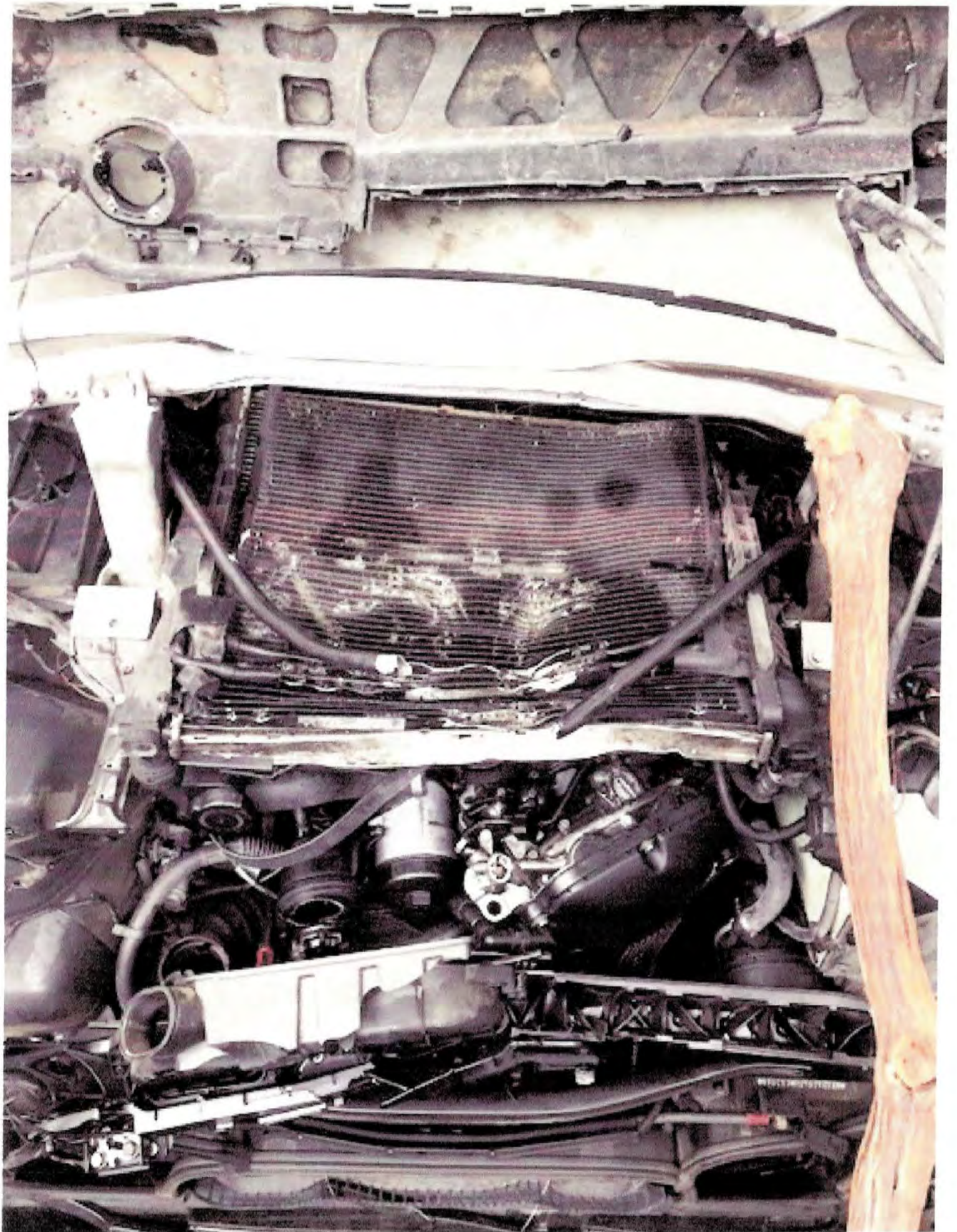
[REDACTED]

2/25/20 Post accident
photo.





Front end damage
located near defective
airbag sensors.



2004 BMW X3 Airbag sensor locations.

7:45 PM Thu Mar 19

15%



Not Secure — bmwfans.info



Gmail · Apps on Google Play

Cannot Open Page

bmw x3 airbag sensor locatio...

Electric parts airbag | BM...



BMW Parts Catalog | BMW X3 F25 SAV | Part groups | Audio Navigation Electronic Systems | Electric parts airbag |

Facebook Twitter YouTube

Electric parts airbag

BMW Parts

DEM Parts

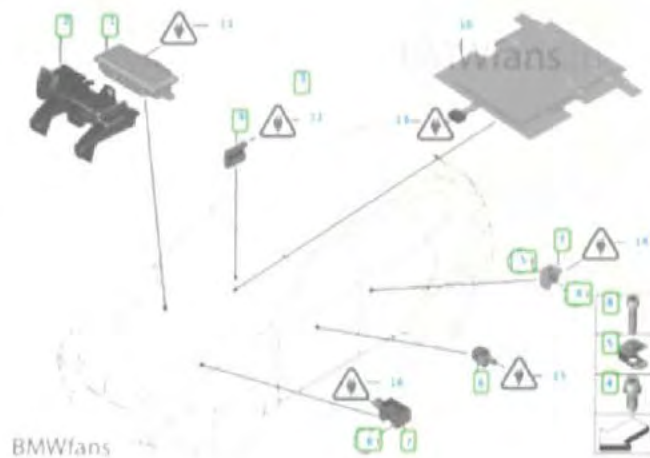
BMW 7 E85

Usage

BMW X3 28iX F25 SAV USA

Left-hand drive

Neutral



Download Your eManual Now

Right-click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

eManual Online

DOWNLOAD

USD

Supplement

Sensor mats for USA are included in Seat covers of main group 52.

#	Description Partnumber	Supplement	Date	Quantity	Weight	Price
---	---------------------------	------------	------	----------	--------	-------



BMW CLASSIC PARTS

ORIGINAL BMW PARTS (ETK)

ORIGINAL MINI PARTS

MORE

BMW WEBETK

NEW & SECONDHAND BMW CARS

Dyece

1

+

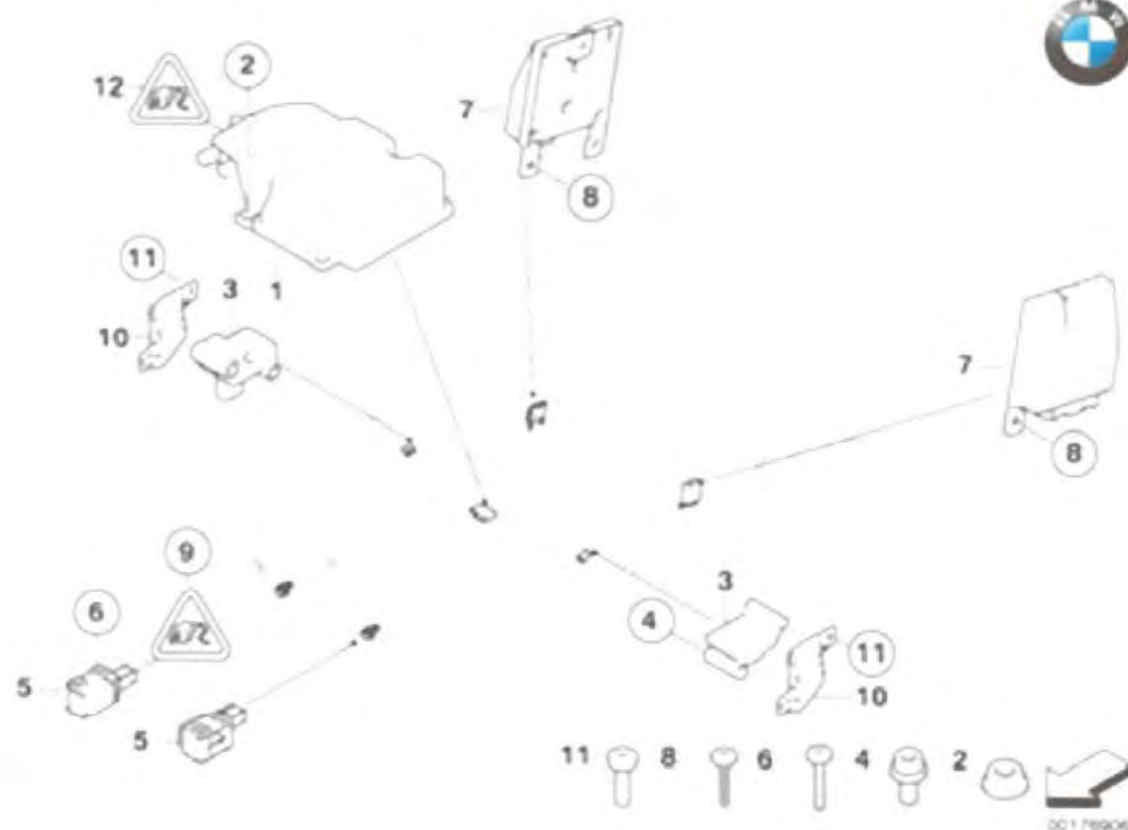
ADD TO CART ✓



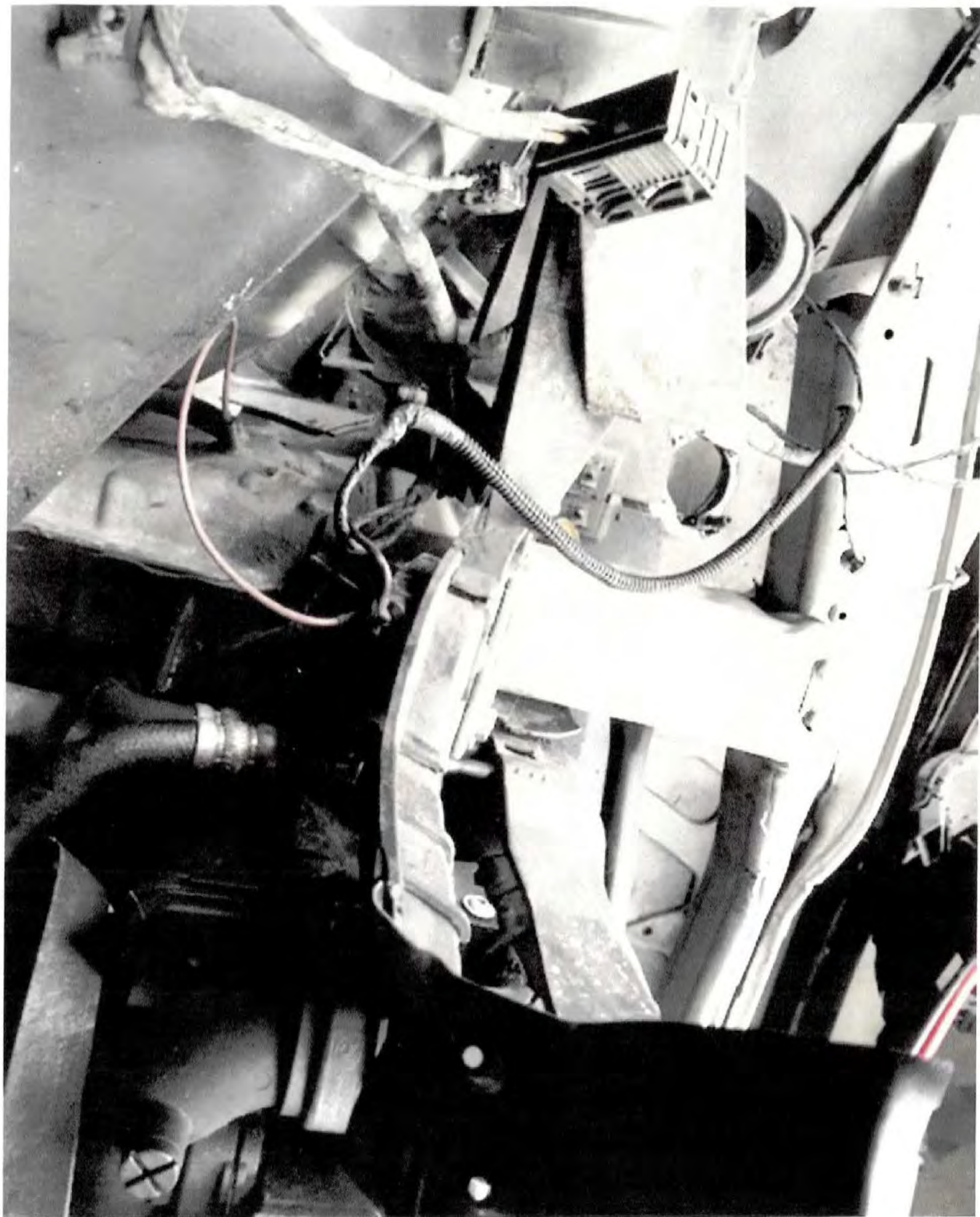
Check out **PayPal**

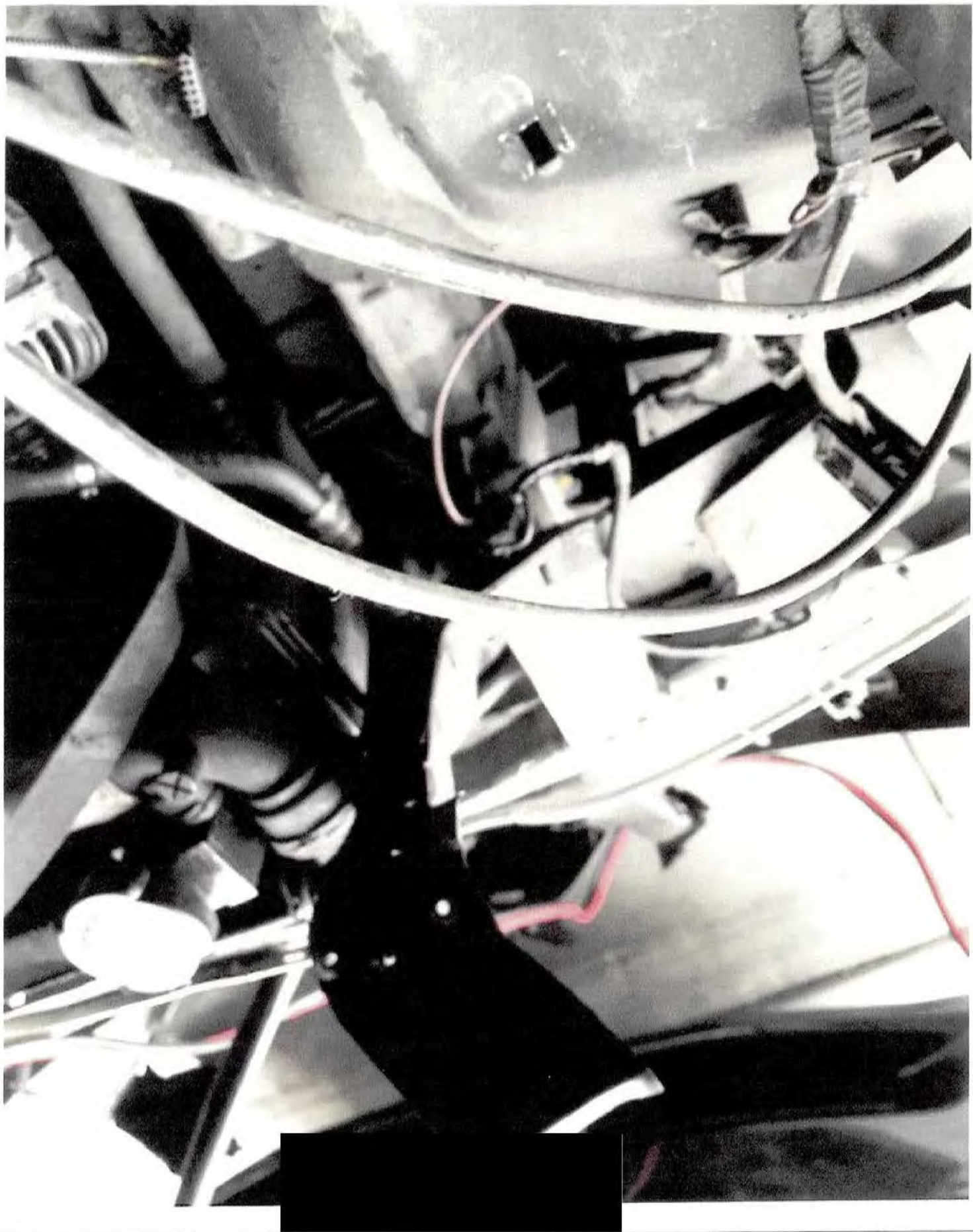
RATENZAHLUNG

Financing available from 99 EUR to 5000 EUR
car's value



Photos of improperly
wired recalled airbags
in the 2004 BMW X3.



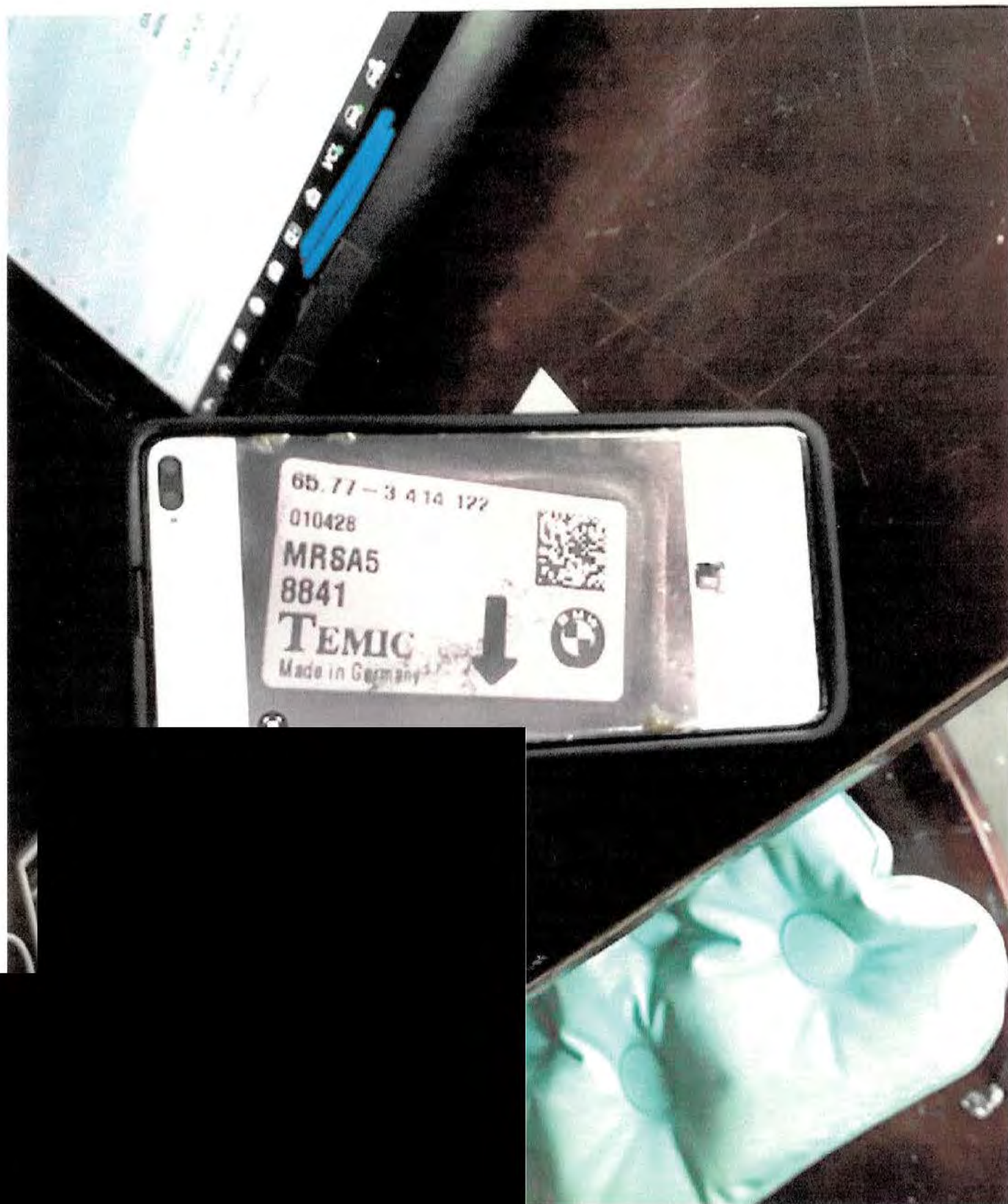






Alleged recalled and
replaced airbag serial
numbers.





Packstuck

900000043014

(D) ACHTUNG!

VERWENDUNG NUR ALS INSASSEN-RÜCK-
HALTESYSTEM MIT AIRBAG FÜR KRAFTFAHR-
ZEUGE. ERLAUBT KEINE REPARATUR. UMGANG
NUR DURCH GESCHULTES PERSONAL. ERLAUBT
KEINE UNTER SPANNUNG STEHENDEN
PRÜFMITTEL VERWENDEN. NICHT ÖFFNEN.
NICHT ENTFERNEN. NICHT IN EIN ANDERES
FAHRZEUG EINBAUEN. FÜHRUNG VON
FUNKTION UND BEI AUS-
LÖSUNG KANN DIE NICHT MONTIERTE AIRBAG-
EINHEIT ZUM GEFÄHRLICHEN WURFSTÜCK
WERDEN. VERHALTENSVORSCHRIFTEN SIEHE
SERVICE-HANDBUCH. ACHTUNG - NUR INERTE
EGENSTÄNDE VERSCHROTEN.

(GB) ATTENTION!

THE USE IS PERMITTED ONLY FOR OCCUPANT
RESTRAINT SYSTEMS IN VEHICLES EQUIPPED
WITH AIRBAGS. NOT REPAIRABLE. HANDLING
IS PERMITTED ONLY BY AUTHORIZED PER-
SONAL. DO NOT USE ANY LIVE ELECTRICAL
TEST EQUIPMENT. DO NOT OPEN, REMOVE OR
INSTALL INTO ANOTHER VEHICLE. RISK OF
MALFUNCTION AND PERSONAL INJURY.
UPON DEPLOYMENT, AN AIRBAG UNIT WHICH
IS NOT PROPERLY MOUNTED MAY BECOME A
DANGEROUS PROJECTILE. REFER TO SER-
VICE MANUAL FOR FURTHER INSTRUCTIONS.
WARNING - SCRAP ONLY INERT PARTS.

(F) ATTENTION!

PEUT ÊTRE UTILISÉ UNIQUEMENT COMME SYSTÈME
DE RETENUE AVEC SAC GONFLABLE INSTALLÉ
SUR DES VÉHICULES. MONTAGE ET DÉMONTAGE
SEULEMENT PAR PERSONNEL QUALIFIÉ. TOUTE
RÉPARATION ET TOUT CONTRÔLE AVEC APPAREILS
SOUS TENSION INTERDITS. NE JAMAIS OUVRIR
NI MONTER DANS UN AUTRE VÉHICULE SOUS
RISQUE DE FONCTIONNEMENT DÉFECTUEUX ET
DE BLESSURES. EN CAS DE DÉCLENCHEMENT LE
SAC GONFLABLE PEUT DEVENIR UN PROJECTIL
DANGEREUX S'IL N'EST PAS MONTÉ CORRECTE-
MENT. RESPECTER ABSOLUMENT LES CONSIGNES
DU MANUEL D'ENTRETIEN. ATTENTION - NE
Mettre au rebut que les produits inertes.



1. Airbag Specialist
diagnostic results
and fault codes.
2. Previous owners
receipt of recalled
airbag replaced.



FAST MOBILE AIR BAG SERVICE & INSTALLATION
THE BEST MOBILE AIR BAG SERVICE IN SOUTHERN CALIFORNIA

COMPLETE AIR BAG

- DIAGNOSTICS
- INSTALLATION
- RE-SETS / ADAS CALIBRATION
- DASH BOARD REPLACEMENT
- MINOR ELECTRICAL REPAIRS

ROD SALAS

TEL. (818) 212-8911

FAX. (818) 365-6865

MONDAY - FRIDAY - 8:00 AM - 5:00 PM
SATURDAY BY APPOINTMENT ONLY



AIR BAG TECH Inc.

Fast, Mobile Air Bag Service
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Business Hours:

Monday - Friday

8:00AM - 5:00PM

Sat. By appointment only

www.airbagtech.net

15028 Larkspur Street · Sylmar, CA 91342

Cell/Office (818) 212-8911

Date: 5-1-2021

INVOICE / ESTIMATE

Phone

Fax / Email

Prepared By: [Signature]

N [Redacted]		R.O.#:		Prepared By: [Signature]	
[Redacted]		City: Fontana		State: CA	
Year: 2004	Make: BMW	Model: X3	V.I.N. #: WBXPA73434W	Residence ☐	
Color: BLACK	Miles: N/A	Product Date: 8-04	Shop ☒		

QTY	WORK DESCRIPTION / PARTS	PARTS	LABOR/HRS
1	S.R.S. Diagnose System w/Disable & Enable		
2	Driver Air Bag ☒ Pass Air Bag ☒ Frontal Door Airbag L ☐ R ☐ Inspected ☒		
4	L R Side Seat Air Bag L R Curtain Air Bag / Headliner ☐ Seat Cover ☐ Cushion ☐ Inspected ☒		
2	L R / RL RR / R Center / Seat Belt Tentioners ☒ Inspected ☒		
2	L R / RL RR / Seat Belt Buckle Pretensioners / Outer Lap Tentioners Inspected ☒		
1	Passenger Seat Calibrate Weight System / Occupant Detectio Inspected ☒		
4	LF RF Impact Crash Sensors / Side L R / RL RR / Front Center ☐ INSPECTED		
	L R Knee Airbag / Dash Board R & L ☐ R & R ☐ Inspected ☐		
	S.R.S. Control Module New / Used / Unknown Replacement / S.R.S. Reset ☐ Reprogram ☐		
	Steering Column R/L ☐ Center Console R/L ☐ S.R.S. Electrical Trouble Shooting ☐		
1	S.R.S. CODE 50 - POWER SUPPLY		
1	S.R.S. CODE 6 - RIGHT FRONT SIDE AIRBAG (DOOR)		
1	INSPECTED FRONT IMPACT - VEHICLE APPEARS TO HAVE HAD A DIRECT IMPACT COLLISION AT THE CENTER OF THE VEHICLE, AIRBAG(S) SHOULD HAVE BEEN DEPLOYED ALONG WITH SEATBELT(S) AND BUCKLES PRETENSIONERS.		
1	S.R.S. SYSTEM MALFUNCTION AT THE TIME OF THE ACCIDENT. FURTHER TESTS SHOULD BE PERFORMED BY THE MANUFACTURE/DEALER.		

Notes: All parts provided by shop/owner ☐	Parts \$	Labor \$ 260 -
	Tax \$	Other \$
	Total \$	Sub Total \$
Mobile charge fee \$ _____ Included ☒ Resale # _____	➡ TOTAL \$ 260 -	

Warranty good for 3 months or 3,000 miles on labor and new parts.

AUTHORIZED FOR REPAIR

Business Hours:

Monday - Friday

8:00AM - 5:00PM

Sat. By appointment only

Fast, Mobile Air Bag Service
& Installation

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Cell/Office (818) 212-8911

Date: 5-1-2021

INVOICE / ESTIMATE

Phone: [REDACTED]

Fax / Email: [REDACTED]

Name: [REDACTED]

R.O.#: [REDACTED]

Prepared By: [REDACTED]

City: FONTANA

State: CA

Year: 2004

Make: BMW

Model: X3

V.I.N. #: WBXPA73434W

Residence ☐Shop ☒

Color: BLACK

Miles: N/A

Product Date: 8-04

Licen: [REDACTED]

QTY

WORK DESCRIPTION / PARTS

PARTS

LABOR/HRS

1	S.R.S. Diagnose System w/Disable & Enable		
2	Driver Air Bag ☒ Pass Air Bag ☒ Frontal Door Airbag L ☐ R ☐ Inspected ☒		
4	L R Side Seat Air Bag / L R Curtain Air Bag / Headliner ☐ Seat Cover ☐ Cushion ☐ Inspected ☒		
2	L R / RL RR / R Center / Seat Belt Tentioners ☒ Inspected ☒		
2	L R / RL RR / Seat Belt Buckle Pretentioners / Outer Lap Tentioners Inspected ☒		
1	Passenger Seat Calibrate Weight System / Occupant Detectio Inspected ☒		
4	LF RF Impact Crash Sensors / Side L R / RL RR / Front Center ☐ INSPECTED		
	L R Knee Airbag / Dash Board R & L ☐ R & R ☐ Inspected ☐		
	S.R.S. Control Module New / Used / Unknown Replacement / S.R.S. Reset ☐ Reprogram ☐		
	Steering Column R/I ☐ Center Console R/I ☐ S.R.S. Electrical Trouble Shooting ☐		
1	S.R.S. CODE 50 - POWER SUPPLY		
1	S.R.S. CODE 6 - RIGHT FRONT SIDE AIRBAG (DOOR)		
1	INSPECTED FRONT IMPACT - VEHICLE APPEARS TO HAVE HAD A DIRECT IMPACT COLLISION AT THE CENTER OF THE VEHICLE, AIRBAG(S) SHOULD HAVE BEEN DEPLOYED ALONG WITH SEATBELT(S) AND BUCKLES/PRETENTIONERS.		
1	S.R.S. SYSTEM MALFUNCTION AT THE TIME OF THE ACCIDENT. FURTHER TESTS SHOULD BE PERFORMED BY THE MANUFACTURE/DEALER.		

Notes:

All parts provided by shop/owner ☐

Parts \$

Labor \$ 260 -

Tax \$

Other \$

Total \$

Sub Total \$

Mobile charge fee \$ _____ Included ☒ Resale # _____

TOTAL \$ 260 -

Warranty good for 3 months or 3,000 miles on labor and new parts.

No warranty on recycled/used parts or repaired S.R.S. control module/repaired seatbelts.

The above is an estimate based on our inspection and does not cover additional parts or labor which may be required after the work has been opened up. Occasionally after work has started damage parts are not evident on first inspection. Because of this the above prices are not guaranteed.

AUTHORIZED FOR REPAIR

You are hereby authorized to make the above repairs.

Print Name: [REDACTED]

Signature: [REDACTED]

Date: 5/1/2021

DRIVE SAFE ALWAYS

42		Left Handing (with 1.5 meters) - Left dipped beam faulty.
43		Left Handing (with 1.5 meters) - Left Handing out at located during the check of standing by does not have beam lamp
44		PDC (Park Distance Control)
45	Left status	Left content
46		Park Distance Control (PDC) left front middle transducer
47		ABSE (Passenger Seat Occupancy)
48	Left status	Left content

DTC code		
DTC code	DTC status	DTC content
3		SBBB Undervoltage
Fault	8	GM5 (General Module 5)
DTC code	DTC status	DTC content
1		GM anti trap protection for front passenger power window unit
2		GM Motor or relay for power window unit front passenger's side
6C		GM LIN bus driver mirror no response

14 (Lamp Switch Center) 2 left brake lamp/
tail lamp faulty

15 (Lamp Switch Center) 2 right brake lamp/
tail lamp faulty

16 (Lamp Switch Center) 2 left front turn
lamp faulty

17 (Lamp Switch Center) 2 right front turn
lamp faulty

18 (Lamp Switch Center) 2 left high beam/
side lamp faulty

19 (Lamp Switch Center) 2 right high beam/
side lamp faulty

20 (Lamp Switch Center) 2 right dipped beam
faulty



DATA
FUSED



VO 63

A

GM Motor or relay for power window unit,
front passenger's side

6C

GM LIN bus driver mirror no response

10

GM anti-trap protection for rear passenger
power window unit

K

GM anti-trap protection for rear driver power
window unit

30

GM K bus data transmission disturbed

D

GM anti-trap protection for front driver power
window unit

W

Battery voltage open circuit

LVL



67% 11:07

VCI		
Fault	1	DME (Digital Motor Electronics)
DTC code	DTC status	DTC content
28B6	Absent	Digital Motor Electronics (DME) inlet camshaft mechanical
Fault	2	EGS/AGS/SMG (Transmission Management)
DTC code	DTC status	DTC content
47		EGS (Electronic Transmission Control) CAN brake signal
47		EGS (Electronic Transmission Control) CAN torque reduction

BMW
X3280-1411



Status report

VCL 63 11:05

Fault	6	ABS-DSC (ABS-DXC8 Dynamic Stability Control)
DTC code	DTC status	DTC content
5EAA	Absent	Dynamic Stability Control (DSC): DSC sensor, rotation rate, plausibility
5E60	Absent	Dynamic Stability Control (DSC): brake lamp switch, plausibility
5F42	Absent	Dynamic Stability Control (DSC): transmission control, limp-home operation
5DD2	Absent	Dynamic Stability Control (DSC): control unit, overvoltage
5EB1	present	Dynamic Stability Control (DSC): LWS (Steering Angle Sensor) supply

BMW X3280-1411
Car BMW X3280-1411

ESC



67% 11:05

RVA
K1160317



Status report

VCI

20

Airbag warning lamp

CI

KOMBI (Instrument Cluster) outside temperature sensor

Fault

1

EWS (Vehicle Immobilizer)

DTC code

DTC status

DTC content

DF

Voltage supply of EWS3 control module

Fault

2

VTG (Transfer Box)

DTC code

DTC status

DTC content

ESC



67% 11:06

BMW
V13.00 14.11



Status report

VCI 13.00 14.11

SF5A	present	Dynamic Stability Control (DSC): instrument cluster, internal
Fault	2	AB (Airbag)
DTC code	DTC status	DTC content
50		Multiple Restraint System (MRS): power supply
6		Multiple Restraint System (MRS): right front side airbag
Fault	2	KOMBI (Instrument Cluster)
DTC code	DTC status	DTC content

BMW VCI 13.00 14.11
BMW VCI 13.00 14.11

ESC



67% 11:06

VCI		
1	AHC - Communication with stepper motor controller 1 disturbed	
2	AHC - Communication with stepper motor controller 2 disturbed	
Fault	1	IHKA (Integrated Automatic Heating And A/C System)
DTC code	DTC status	DTC content
20	IHKA (Integrated Automatic Heating and A/C System) AUC (Automatic Air Recirculation Control) heating	
Fault	9	LSZ II (Light Switch Center II)
DTC code	DTC status	DTC content

ESC

67% 11:06

CUSTOMER #:

**BEVERLY HILLS BMW**

INVOICE

Service and Parts: 5151 Wilshire Blvd.

Los Angeles, CA 90036

Telephone (323) 801-1600 Fax (323) 801-1700

Sales: 5070 Wilshire Blvd., Los Angeles, CA 90036

Telephone (323) 801-1430 Fax (323) 801-1439

www.bmwofbeverlyhills.com

LOS ANGELES, CA

PAGE 1

B.A.R.# AD189200

E.P.A.# CAD981581754

HOME: CONT: SERVICE ADVISOR: 374 DUNG TRINH
BUS: ELL:

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG	
BLACK	04	BMW X3 2.5I	WBXPA73434W		106876/106879		
DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
19NOV04 DD			18:30 29DEC17			CASH	04JAN18
R.O. OPENED		READY	OPTIONS:	DLR:	ENG:2.5 Liter		

11:49 29DEC17 14:33 04JAN18

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
A	S	I	B	65	19	08	

A S I B 65 19 08

00BMZ RECALLS/CAMPAIGNS

5497 W

(N/C)

1 52-10-3-455-247 SPORTS SEAT UPHOLSTERY

PARTS:521067

(N/C)

2 52-10-8-099-039 SCREW:889520

(N/C)

2 07-14-9-156-956 HEX NUT WITH RIBS:889520

(N/C)

2 52-10-8-211-438 HEX BOLT:889520

(N/C)

25 52-10-1-945-543 CLAMP:889520

(N/C)

2 52-20-1-964-201 CLIP, BLACK:889520

(N/C)

2 52-20-1-964-201 CLIP, BLACK:889520

(N/C)

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

106879 SEAT MAT OCCUPANCY SENSOR NEEDS TO BE REPLACED. RAN SHORT
 TEST. CONNECTED BATTERY CHARGER. FOUND FAULT FOR FRONT PASSENGER SEAT
 OCCUPANCY DETECTOR SENSOR. RAN TEST PLAN FOR SEAT OCCUPANCY SENSOR.
 REPLACE SEAT OCCUPANCY DETECTION AS PER TEST PLAN. REMOVED FRONT SEAT.
 REMOVED BACKREST OFF OF SEAT. REPLACED SEAT MAT OCCUPANCY SENSOR.
 ENABLED PASSENGER SEAT MAT OCCUPANCY SENSOR THRU TEST PLAN. TEST DROVE.
 PERFORMED SHORT TEST AGAIN. NO FAULT FOR PASSENGER SEAT OCCUPANCY.

B CUSTOMER HAS AGREED TO RECEIVE TEXT MESSAGES FROM BMW OF BEVERLY
 HILLS. PLEASE TEXT STOP AT ANY TIME TO NO LONGER RECEIVE THESE
 MESSAGES

TEXT CUSTOMER HAS AGREED TO RECEIVE TEXT MESSAGES
 FROM BMW OF BEVERLY HILLS. PLEASE TEXT STOP
 AT ANY TIME TO NO LONGER RECEIVE THESE
 MESSAGES

5497 CC

0.00

0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

C *Deferred Maintenance Interval Customer Has Been Informed That A
 Maintenance Interval Is Now Due

DMB DEFERRED BASIC

5497 IPS

(N/C)

Original Estimate (Parts & Labor)	Total Additional Cost Authorized	Approved By:	Date & Time	Authorization Obtained By:	*HAZARDOUS WASTE DISPOSAL COSTS: We have added this charge to cover costs associated with the handling, management and disposal of toxic wastes or hazardous substances under California and Federal Law.	DESCRIPTION	TOTALS
\$	\$			☐ Telephone ☐ Fax (See Attached) ☐ E-mail (See Attached)	ALL PARTS ARE NEW UNLESS OTHERWISE INDICATED. ☐ Some Parts Not Returnable	LABOR AMOUNT	
						PARTS AMOUNT	
						GAS, OIL, LUBE	
						SUBLET AMOUNT	
						WASTE DISPOSAL COSTS *	
Revised Estimate \$	\$			☐ Tire pressure check/inflation service was performed. RF _____ psi LF _____ psi RR _____ psi LR _____ psi ☐ Customer declined tire pressure check/inflation service. Initials _____		TOTAL CHARGES	
By signing below, you acknowledge that you were notified of and authorized the Dealership to perform the services/repairs itemized in this invoice and that you received (or had the opportunity to inspect) any replaced parts as requested by you.						LESS INSURANCE	
DATE _____ CUSTOMER SIGNATURE _____ AUTHORIZED DEALERSHIP REPRESENTATIVE SIGNATURE _____						SALES TAX	
						PLEASE PAY THIS AMOUNT	

NOTICE TO CONSUMER: PLEASE READ IMPORTANT INFORMATION ON BACK.

CUSTOMER

**BEVERLY HILLS BMW**

Service and Parts: 5151 Wilshire Blvd.

Los Angeles, CA 90036

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www.bmwofbeverlyhills.com

INVOICE

PAGE 2

B.A.R.# AD199200

E.P.A.# CAD981581754

HOME:
BUS:CONT
CELL:

SERVICE ADVISOR: 374 DUNG TRINH

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG
BLACK	04	BMW X3 2.5I	WBXPA73434V		106876/106879	
DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT
19NOV04 DL			18:30 29DEC17			CASH
R.O. OPENED	READY	OPTIONS:	DLR	ENG:2.5 Liter		
11:49 29DEC17	14:33 04JAN18					

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
PARTS:	0.00	LABOR:	0.00	OTHER:	0.00	TOTAL LINE C:	0.00

D *Inspect Adjust Tire Pressures as per CARB Requirement
CARB CHECK TIRE PRESSURE AND RECORD LF RF

RR LR

5497 CMNT

0.00

0.00

PARTS:	0.00	LABOR:	0.00	OTHER:	0.00	TOTAL LINE D:	0.00
--------	------	--------	------	--------	------	---------------	------

,,, INSPECT TIRE PRESSURES. ADJUSTED TIRE PRESSURES AS PER CARB
,,, REQUIREMENT 35PSI FRONT 41PSI REAR.

E *Complimentary Multipoint Inspection ... a \$49.97 Value

IBM BMW VEHICLE INSPECTION INCLUDING CHECK TIRE

PRESSURE RF LF RR LR

5497 IPS

(N/C)

PARTS:	0.00	LABOR:	0.00	OTHER:	0.00	TOTAL LINE E:	0.00
--------	------	--------	------	--------	------	---------------	------

,,, INSPECTION. PERFORMED INSPECTION.

*****THE FOLLOWING WORK WAS RECOMMENDED BUT NOT PERFORMED*****

,,, SUMMARY VIBROL R/F RIM BENT. RECOMMEND REPLACEMENT. CHROME WHEEL.
VIBRBB REAR BRAKE PADS AT 2MM RECOMMEND REPLACEMENT FULL REAR BRAKES.
OIL PAN GASKET LEAKING. RECOMMEND REPLACEMENT
VALVE COVER GASKET LEAKING. RECOMMEND REPLACEMENT
COOLANT SYSTEM REHOSE DUE TO HIGH MILEAGE AND HOSES BRITTLE. AS WELL AS E
BRAKE FLUID SERVICE
MICRO FILTER SERVICE
WINDSHIELD WIPERS. STREAKING
OIL FILTER HOUSING GASKET LEAKING AS WELL AS OIL PIPE FOR VANOS.

Original Estimate (Parts & Labor)	Total Additional Cost Authorized	Approved By:	Date & Time	Authorization Obtained By:	*HAZARDOUS WASTE DISPOSAL COSTS: We have added this charge to cover costs associated with the handling, management and disposal of toxic wastes or hazardous substances under California and Federal Law.	DESCRIPTION	TOTALS
\$	\$			☐ Telephone ☐ Fax (See Attached) ☐ E-mail (See Attached)	ALL PARTS ARE NEW UNLESS OTHERWISE INDICATED. ☐ Some Parts Not Returnable	LABOR AMOUNT	0.00
Revised Estimate				☐ Telephone ☐ Fax (See Attached) ☐ E-mail (See Attached)		PARTS AMOUNT	0.00
\$						GAS, OIL, LUBE	0.00
						SUBLET AMOUNT	0.00
						WASTE DISPOSAL COSTS *	0.00
☐ Tire pressure check/inflation service was performed. RF psi LF psi RR psi LR psi ☐ Customer declined tire pressure check/inflation service. Initials						TOTAL CHARGES	0.00
By signing below, you acknowledge that you were notified of and authorized the Dealership to perform the services/repairs itemized in this invoice and that you received (or had the opportunity to inspect) any replaced parts as requested by you.						LESS INSURANCE	0.00
DATE	CUSTOMER SIGNATURE	AUTHORIZED DEALERSHIP REPRESENTATIVE SIGNATURE				SALES TAX	0.00
						PLEASE PAY THIS AMOUNT	0.00

NOTICE TO CONSUMER: PLEASE READ IMPORTANT INFORMATION ON BACK.

To protect the privacy of individuals, NHTSA does not make medical records available to the public without authorization. For this reason, documents falling into this category have not been included in this complaint record.

TO ENSURE YOUR LIABILITY IS RELEASED, PLEASE FOLLOW THE INSTRUCTIONS BELOW.
THE FORM MUST BE COMPLETED IN FULL. PRINT IN CAPITAL LETTERS USING BLACK OR BLUE INK.

NOTICE OF TRANSFER AND RELEASE OF LIABILITY

MAIL THIS FORM TO DMV
OR FILE ONLINE AT dmv.ca.gov

COMPANY NAME [REDACTED]		FIRST [REDACTED]	NUMBER [REDACTED]	ODOMETER READING (NO TENTHS) 2
SELLER'S OR LESSEE'S LAST NAME (OR) COMPANY NAME Fontana		STATE CA	ZIP CODE [REDACTED]	DATE OF SALE, TRANSFER, OR LEASE RETURN MO. DAY YR. 10 06 11
[REDACTED]		FIRST [REDACTED]	SELLING PRICE (NO CENTS) \$0	
[REDACTED]		APT NUMBER [REDACTED]		WHOLE DOLLAR
CITY Fontana	STATE CA	[REDACTED]		IF VEHICLE IS A GIFT, ENTER 0 FOR SELLING PRICE
VEHICLE LICENSE OR CF NUMBER [REDACTED]	MAKE OR BUILDER BMW	YEAR MODEL 2004	VEHICLE ID OR VESSEL HULL NUMBER WBXPA7343W	

WARNING! You must provide accurate, legible information: vehicle/vessel description, your name/address, buyer's name/address, and date of sale, transfer, or lease return, or the information SHALL NOT be updated or retained.

REG 138 (REV. 2/2012)

652 MAR 05 2011



NOTICE OF TRANSFER AND RELEASE OF LIABILITY



Please Protect Yourself
Submit a Notice of Transfer
and Release of Liability
Give Us **FIVE** in **FIVE**

1. VEHICLE OR VESSEL DESCRIPTION
2. NEW OWNER'S NAME AND ADDRESS
3. ODOMETER READING

4. DATE OF SALE, TRANSFER, OR LEASE RETURN
 5. YOUR NAME AND ADDRESS
- Within 5 Days

This form may be filed online at dmv.ca.gov and a receipt can be printed ensuring it had been received.
This form may also be mailed, but no notification will be sent that it was received.

WARNING: You must provide accurate, legible information: vehicle/vessel description, your name/address, new owner's name and address, and the date of sale, transfer, or lease return.

Otherwise the information WILL NOT be updated or retained.

You WILL NOT receive notification that the information was not updated or retained.

Pay careful attention to write the new owner's information in the new owner section and the seller's information in the seller's section. If you have multiple vehicles or sell multiple vehicles at the same time, be sure to enter the correct vehicle license plate and vehicle identification number for the correct vehicle and list the correct new owner. File this form within 5 days of the transaction taking place. Submitting this notice yourself is the best way to ensure DMV gets all the information in a timely manner. If you give this form to the new owner,

Thank you

Sent from my Sprint Samsung Galaxy Note8.

----- Original message -----

From: Michael.Pigoncelli@bmwna.com

Date: 3/9/20 12:44 PM (GMT-08:00)

To: [REDACTED]

Subject: 2004 BMW X3 2.5i, VIN: W [REDACTED]

Good Afternoon [REDACTED]

Thank you for taking some time to speak with me today. Please accept this e-mail as a follow up to our conversation of Monday, March 09, 2020.

As we discussed, feel free to provide me with any documentation you may have in your possession that would assist us with our investigation. Such items would include post-accident photos of the vehicle and the receipt from the prior repair performed.

If you have any questions or need anything in the meantime, please don't hesitate to contact me. I can be reached Monday through Friday at [\(201\) 571-5820](tel:(201)571-5820) from 8:30 a.m. to 4:00 p.m. Eastern Time.

Kind regards,

Michael

BMW Group

Michael Pigoncelli

Special Product Investigations

Customer Relations and Services

BMW of North America, LLC

200 Chestnut Ridge Rd - Woodcliff Lake, NJ 07677

Initial response from Attorney General, however I beg to differ I believe this office handles civil complaints, please review the information provided that was not on initial contact. Thank you

XAVIER BECERRA
Attorney General

State of California
DEPARTMENT OF JUSTICE



PUBLIC INQUIRY UNIT
P.O. BOX 944255
SACRAMENTO, CA 94244-2550
(916) 210-6276
TOLL FREE: (800) 952-5225
TTY: CA Relay Service
(800) 735-2922

March 4, 2020

PIU: 868128

Fontana, CA

RE: BMW of North America, LLC

Dear

Thank you for your recent correspondence to the Office of the Attorney General.

We have reviewed your correspondence and determined that the following agency is in a much better position to render assistance to you in this matter. If you wish to pursue the matter further, we suggest you contact:

U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, DC 20590
DOT Auto Safety Hotline: 1-888-327-4236
Internet: <http://www.nhtsa.gov/>

We hope that our effort to help you to identify the correct government office to address your concern will be beneficial to you.

Again, thank you for contacting the Office of the Attorney General.

Sincerely,

Brittany Currey
Public Inquiry Unit

For **XAVIER BECERRA**
Attorney General

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Los Angeles, CA 90036

Certified Mail Fee \$3.75
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Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$1.56
\$

Total Postage and Fees \$5.31
\$

0201
02

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02/25/2022

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Street and Apt. No., or PO Box No.

City, State, ZIP+4®

PS Form 3800, April 2015 PSN 7530-02-000-0047

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



7020 0090 0001 9869 6500

Fontana, CA

Department of Transportation

To: W41-306

Location Code: DOT

Cost Center: 4 West

Mall Point: NEC, NOA, NIA

External Carrier: PRIORITY

Sender:

Manufacturer

Purchase Order:

DOT

3/17/2022 12:06:25 PM



70200090000198696500

TO:

*U.S. Department of TRAN.
National Highway and TR
1200 New Jersey Ave, SE
Washington, DC 20590*