

January 5, 2022

VIA FEDERAL EXPRESS AND EMAIL

Stellantis N.V.

Singaporestraat 92

1175 RA Lijnden, The Netherlands

Mr. Carlos Tavares, Chief Executive Officer

Mr. Richard Schwarzwald, Chief Customer Experience Officer

Mr. Harald Wester, Chief Engineering Officer

Mr. Jean-Pierre Plavé, Chief Design Officer

Alfa Romeo

FCA Italy S.p.A.

Corso Agnelli, 200

10135 Turin

Mr. Jean-Philippe Imperato, Brand CEO

FCA US LLC

1000 Chrysler Drive

Auburn Hills, MI 48326

Mr. Bruno Cattori, Chief Executive Officer

Carlock Motorcars

1599 Mallory Lane

Brentwood, TN 37027

Mr. Clay Carlock, Owner

Mr. Kurt Keener, General Manager

Mr. Jon Stainton-James, Service Advisor

Re: Recurring System-Wide Failures In Alfa-Romeo Giulia Present Major Life-Threatening Safety Hazard; Demand For Prompt Repurchase of Vehicle By Manufacturer

Gentleman:

I bring to your direct attention a recurring, life-threatening defect in which the Alfa Romeo Giulia being designed, manufactured, distributed and sold by your organizations experiences a system-wide failure that leads to the vehicle becoming immediately incapacitated without warning while in motion, including travel at interstate speeds.

In my particular case, after having experienced the danger in driving the Giulia, your organizations have, quite literally, left me stranded with a Giulia that, after the exercise of great customer patience across two vehicles and three engines, can only be described as unsafe to drive and inoperable.

Specific reference is made to the following two Alfa Romeos and their records of purchase and service at Carlock Motorcars (f/k/a Music City Motorcars, Franklin, TN and herein referred to as "Carlock"):

- 2018 Alfa Romeo Giulia, VIN # ZARFAECN93[REDACTED] (the "2018 Giulia")
- 2017 Alfa Romeo Giulia, VIN # ZARFAECNXH[REDACTED] (the "2017 Giulia")

Additional reference is made to the following identified complaints as filed with the National Highway Traffic Safety Administration ("NHTSA"), including that certain complaint filed by the undersigned with NHTSA ID # 11446308 (collectively the "NHTSA Complaints"):

- NHTSA IDs#: 11352684, 11422256, 11361102, 11339955, 11032756

2017 Giulia Background. Vehicle was purchased new for cash (\$47,990.00) on 1/31/17 from Carlock Motorcars and sold directly by general manager of dealer to customer. Within the first twelve months, vehicle was in service five (5) times for a total of forty-nine (49) days with recurring computer, electronic and other system failures. The manager of the dealer, recognizing the underlying fundamental issues with the 2017 Giulia, offered and facilitated a swap of the 2017 Giulia for the 2018 Giulia on 4/6/2018 (customer paid an additional \$950.00 in cash purchase price alongside a trade-in of the 2017 Giulia).

2018 Giulia Background. Vehicle began presenting significant life-threatening system-wide failures while driving, on or about November 30, 2020. These catastrophic system failures result in the vehicle becoming immediately undrivable without warning placing drivers and passengers at significant risk, particularly when traveling at high speeds (e.g., interstates) and / or accelerating. The following summarizes system-wide failures in the 2018 Giulia and failed attempts to correct this defect by Alfa Romeo and Carlock:

- 11/30/20: One (1) day of service at Carlock after complete multi-system failure while driving locally. Returned same day by service department but failed to repair (see following service report).
- 11/30/20 – 12/4/20: Five (5) days of service. Vehicle presented to Carlock service department immediately after pick-up from aforementioned service to correct 2nd systemic failure which subsequently occurred promptly after departing the dealership. Resulting system failure produced highly dangerous operating conditions in which vehicle became immediately and unexpectedly incapacitated while attempting to merge into interstate traffic at accelerating speed. Note: The service record for this event suggests the vehicle was test driven for more than 50 miles following repair but the mileage in / out was unchanged on the service record.
- 1/25/21 – 2/5/21: Twelve (12) days of service following 3rd system failure. As per Carlock service representatives, an Alfa Romeo service agent informed them that there was a defect in in the molds used for creating engine / engine blocks in the Giulia and the resulting defects in the engine / engine blocks can cause an oil leak while in operation which, based on its location, can result in entire operating system collapsing unexpectedly when said leak occurs. As documented in the service record, metal shavings were found in the oil and oil pump of vehicle and per the guidance of the Alfa Romeo service agent, Carlock replaced the entire engine with a new one. Note: The service record for this event suggests the vehicle was test driven for more than 30 miles following repair but the mileage in / out was unchanged on the service record.

January 5, 2022

Page 3 of 4

- 2/26/21 – 3/3/21: Seven (7) days in service following check engine warnings on new engine with less than 2,000 miles on it.
- 10/18/21 – 10/18/21: First scheduled service for new engine.
- 12/10/21 – present: On 12/10/21, the 4th catastrophic system failure occurred in the 2018 Giulia during interstate travel in the rain while attempting to accelerate and pass a slow moving vehicle. This system failure once again caused extraordinarily dangerous and unsafe conditions without warning and resulted in vehicle becoming immediately inoperable and unsafe to drive.

The 2018 Giulia was subsequently towed to my home at my own expense. Since 12/10/21, I have proactively sought to work with Carlock in notifying the appropriate officials at Alfa Romeo of this issue, to coordinate having the vehicle towed from my home to Carlock, and to arrange a format for me to return the vehicle to Alfa Romeo. This included an in person visit that I initiated with Mr. Keener on 12/11/21 who assured me that he would speak to Alfa Romeo on Monday, 12/13 and call me directly. I have not heard from Mr. Keener despite trying to contact him since that time.

Additionally, I have contacted Alfa Romeo Roadside Assistance multiple times and have received no communication back as promised in regard to having the vehicle towed and Carlock has offered no assistance in this regard although aware of the issue and my need for assistance. See documentation of request below:

**Your Roadside Service Request**

REFERENCE #	[REDACTED]
PROBLEM	Need a Tow With Vehicle
LOCATION	[REDACTED] USA Nashville, TN
LOCATION TYPE	Residence/Work-Driveway
CONTACT INFORMATION	[REDACTED] Notification text
VEHICLE DETAILS	2018 ALFA ROMEO Giulia (952) Black
TOW DESTINATION	[REDACTED] USA, BRENTWOOD, TN 13.01 miles
COMMENTS	Car has had massive and abrupt system failure while moving for third time. Car is fundamentally unsound and unsafe to drive.

January 5, 2022

Page 4 of 4

In connection with the aforementioned matters, Alfa Romeo is requested to (i) formally investigate the defects described above, (ii) make arrangements to have the 2018 Giulia towed from the address below, and (iii) repurchase the 2018 Giulia for the cash purchase price paid of \$48,490.00.

Your prompt response is requested.

[REDACTED]
[REDACTED]
Nashville, Tennessee
[REDACTED]

Cc: Mr. Samuel P. Funk, Partner, Sims Funk PLC
Mr. Giorgio Fussati, General Counsel, Stellantis N.V.
Mr. Steven Cliff, Deputy Administrator, National Highway Traffic Safety Administration
Ms. Julie Vallese, Associate Administrator, Communications and Consumer Information,
National Highway Traffic Safety Administration

WS3-435



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FedEx Express *Package US Airbill*

FedEx Tracking Number

[Redacted Tracking Number]

1 From
Date _____
Sender's Name _____ Phone _____
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City _____ State _____ ZIP _____
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2 Your Internal Billing Reference

3 To
Recipient's Name _____ Phone _____
Company _____
Address _____
We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room _____
Address _____
Use this line for the HOLD location address or for continuation of your shipping address.
City _____

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1AD

Form ID No. **0200**

4 Express Package Service *To most locations. **Packages up to 150 lbs.** For packages over 150 lbs. use the FedEx Express Priority Mail Airbill.

Next Business Day

☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ **FedEx Priority Overnight**
Next business morning. *Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ **FedEx Standard Overnight**
Next business afternoon. *Saturday Delivery NOT available.

2 or 3 Business Days

☐ **FedEx 2Day A.M.**
Second business morning. *Saturday Delivery NOT available.

☐ **FedEx 2Day**
Second business afternoon. *Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ **FedEx Express Saver**
Third business day. *Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

☐ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☒ **Other**

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

☐ **Saturday Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.

☐ **Direct Signature**
Someone at recipient's address may sign for delivery.

☐ **Indirect Signature**
If no one is available at the delivery address, someone at a neighboring address may sign for delivery for residential deliveries only.

Does this shipment contain dangerous goods?

☐ No ☐ Yes (See attached Shipper's Declaration) ☐ Yes (Shipper's Declaration not required) ☐ Dry Ice (Dry Ice 9, UN 1845) _____ kg

Restrictions apply for dangerous goods — see the current FedEx Service Guide. ☐ **Cargo Aircraft Only**

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☐ **Sender** (Acct. No. in Section 7 will be billed) ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☒ **Cash/Check**

Total Packages _____ **Total Weight** _____ **Credit Card Auth.** _____

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644