



The Office of
Minnesota Attorney General Keith Ellison
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June 18, 2024

National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: [REDACTED]

File No: [REDACTED]

Dear Sir/Madam:

I enclose a copy of a correspondence that this Office received from [REDACTED] I ask that you review the complaint and respond directly to [REDACTED] as appropriate.

I am sure that Joshua Carlson would appreciate hearing from National Highway Traffic Safety Administration regarding this matter.

I thank you for your attention to this matter.

Sincerely,

[REDACTED]
Taylor Griffin
Consumer Action
651-724-9207 (Voice)
(651) 282-2155 (Fax)
Email: AG.Replies@ag.state.mn.us

Enclosure: Copy of a correspondence from [REDACTED]

cc: [REDACTED]

|#5811174-v1

[REDACTED]
Edina, MN

Telephone: [REDACTED]

E-mail: [REDACTED]

May 29, 2024

Pirelli Tire LLC
Consumer Affairs Group
Legal Group Litigation
100 Pirelli Drive
Rome, GA 30161
Email: consumer.affairs@pirelli.com

Legal Department
BMW Financial Services
1400 City View Drive
Columbus, OH 43215

The Honorable Keith Ellison
Attorney General of Minnesota
Consumer Protection Agency, Consumer Fraud Division
445 Minnesota Street, Suite 1400
St. Paul, MN 55101-2131

Sent Via Fedex Tracked

Subject: Conspiracy between BMW and Pirelli and possibly other tire manufactures and produce and sell tires for BMW vehicles for install on new cars at their manufacturing plant with meaningless, vague, undisclosed, unenforceable, non-existent warranties to millions of consumers who have no recourse.

Dear Recipients,

I hope this message finds you well. I am writing to bring an urgent matter to your attention regarding the Pirelli Cinturato P7 All Season run-flat tires on my BMW X3. As the owner of [REDACTED] a law firm based in Edina, MN, I have encountered a significant safety issue with these tires.

Details of the Issue:

Vehicle: My 2022 BMW X3

Tire Model: Pirelli Cinturato P7 All Season (Run-Flat)

Mileage: Approximately 23,000 miles

Safety Concern: I have been informed by a certified BMW dealership MotorWerks, that the tires are unsafe at this mileage and need to be immediately replaced.

These tires were expected to perform reliably for up to 70,000 miles, according to the warranty terms provided. The fact that they have been deemed unsafe at only 23,000 miles is deeply concerning and warrants immediate action under your warranty provisions.

Request for Warranty Coverage:

I request a full replacement of the defective tires under the standard limited warranty and treadwear coverage terms. The tires' premature wear and safety concerns make it imperative that they are replaced promptly to ensure my vehicle's safe operation.

Potential Class Action Investigation:

Additionally, please be advised that my law firm is currently investigating a potential class action regarding deceptive trade practices and consumer fraud related to Pirelli's tire products. This investigation concerns the millions of tires sold by Pirelli that may not meet the advertised performance and safety standards.

Conspiracy and Deceptive Trade Practices by BMW and Pirelli and Maybe Others:

It has come to my attention that BMW has conspired with Pirelli to equip their vehicles with Pirelli tires specifically designed for BMW, which are by design devoid of any meaningful warranty protection to the consumer. These tires provide zero treadwear or mileage promises, and this crucial information is not disclosed to lessees or buyers upfront. This practice is deceptive, leaving consumers with no recourse and often necessitating tire replacements as early as 15,000 miles, which is wholly unacceptable. This is also a massive safety issue and in my estimation could include millions of tires going back many years, what I hear is about 5-8 years.

Request for Goodwill and Collaboration:

While we are prepared to take legal action to protect consumer rights, we would appreciate your goodwill in addressing this issue swiftly and satisfactorily. Honoring the warranty for my tires would demonstrate Pirelli's commitment to customer safety and product integrity. Additionally, we urge BMW Financial Services to review and rectify their warranty policies regarding these tires to avoid further consumer harm and legal scrutiny.

We look forward to your prompt response and resolution of this matter. Please contact me directly at [REDACTED] or via email at [REDACTED] to discuss this further.

Thank you for your immediate attention to this urgent matter.

Sincerely,

[REDACTED]

Edina, MN [REDACTED]

Telephone: [REDACTED]

E-mail: [REDACTED]

St. Paul, Minnesota



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