



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF ECONOMIC JUSTICE
BUREAU OF CONSUMER FRAUDS AND PROTECTION

April 27, 2025

David Finlayson
689 Riverview Rd
Rexford, NY 12148-1427

Re: Our File Number [REDACTED]
Subject: Jaguar Land Rover North America, LLC

Dear [REDACTED]

On behalf of Attorney General Letitia James, I am writing to notify you that we have received your correspondence.

We appreciate your alerting us to this matter. We believe the agency shown below may be able to assist you and we are forwarding your correspondence there.

If you do not receive a response in the near future, please follow up directly with that agency. I suggest you attach a copy of this letter or, if appropriate, mention that you are adding new information.

Thank you for writing to our office. We will keep your correspondence on file for future reference.

Very truly yours,

Ronald Furan

Ronald Furan
Bureau of Consumer Frauds and Protection

cc: National Highway Traffic Safety Administration
Office Of Defects Investigation
West Bldg, 1200 New Jersey Ave SE
Washington, DC 20590-0001
(888) 327-4236

OFFICE OF THE ATTORNEY GENERAL LETITIA JAMES
STATE OF NEW YORK DEPARTMENT OF LAW



BUREAU OF CONSUMER FRAUDS AND PROTECTION
The Capitol
Albany, NY 12224-0341
Tel: (518)776-2307 | Fax (518)915-7736

Consumer Hotline
(800)771-7755
TDD (800)788-9898
<http://www.ag.ny.gov>

Intake Id



Complaint Bureau

Bureau Where You Filed Your Complaint ALBANY

Your Information

First Name



Last Name



Your Business/Organization Name

Street Address



Address Line 2

City/Town

Rexford

State

NY

County

SARA

Zip/Postal Code



Country

US

Email Address



Phone Number



Alternate Phone Number

Subject of Your Complaint

Are you complaining about a person or a company?

COMPANY

Business Name

Jaguar Land Rover North America, LLC

Street Address

100 Jaguar Land Rover Way

Address Line 2

City/Town

Mahwah

State

NJ

Zip/Postal Code

07485

Email Address

swilcox1@jaguarlandrover.com

Phone Number

201-818-8025

Website

<https://www.jaguarusa.com/contact-us/index.html>

Additional Complaint Information

Date of Incident/Transaction	2023-05-23
Name of Product or Service	2019 Jaguar I-Pace
Cost of Product or Service	\$72,092.75
Method of Payment	CREDIT

Complaint Description

NHTSA Safety recall due to fire risk. Jaguar has elected compliance via vehicle repurchase. Law states refund minus reasonable depreciation. Law specifies this is a use calculation based upon purchase date and initial defect date.

- New Vehicle Purchase Date: June 23, 2021
- Date of
Original Defect (Recall H441): May 23, 2023
- Ownership Period Prior to Defect: 1 Year, 11
Months

Jaguar is trying buyback the vehicle using defect-depreciated recent blue book value. An offer of \$28,316 was made for a vehicle purchased new for \$72K, and was defective 1 year, 11 months and 18K miles after NEW purchase.

Did you sign a contract?	Y
Where?	Jaguar Land Rover Glen Cove
When?	2021-06-23
Was product or service advertised?	Y
Where?	Internet
When?	2021-06-22
Have you already complained to company/individual?	Y
How?	BY TELEPHONE

Complaint Date	2024-09-10
Person contacted	Brian McDevitt
Job title	General Manager
Nature of response	Stated Jaguar not allowing Dealership assistance. Not allowing customer contact. Jaguar will call
Date of response	2024-10-10

Has matter been submitted to another agency or attorney? N

Is court action pending? N

What form of relief are you seeking, e.g., refund, credit, exchange, repair?

Refund as provided by Law:

NHTSA: "refund the purchase price in full minus a reasonable allowance for depreciation."

Magnuson-Moss Warranty Act basis for depreciation:

- New Vehicle Purchase Date:

June 23, 2021

- Date of Original Defect (Recall H441): May 23, 2023

- Ownership Period Prior to

Defect: 1 Year, 11 Months, approx 18k miles

Manufacturer of Product

Jaguar Land Rover North America, LLC

Street Address

100 Jaguar Land Rover Way

City/Town

Mahwah

State/Town

NJ

Zip/Postal Code

07495

Product Model or Serial Number

VIN: [REDACTED]

Warranty Expiration Date

2027-07-30

Did Business Arrange Financing?

N

Uploaded Documents

User Uploaded Document Names

PurchaseAgreement[REDACTED].pdf

[REDACTED]DealerInstructions.pdf

Demand_Letter_Jaguar_Recall_NHTSA_Buyout[REDACTED].pdf

NHTSAGuidancemvdefectsandrecall[REDACTED].pdf

NHTSAH[REDACTED]3Recallstillunrepaired.pdf

In filing this complaint, I understand that:

- The Attorney General is not the complainant's private lawyer. The Attorney General is a public servant who protects the public from illegal or misleading practices. This complaint does not mean that the Attorney General will start a lawsuit for the complainant.
- The Attorney General cannot give me legal advice or represent me in court. If I have any questions about my legal rights or responsibilities, I should contact a private lawyer.
- The Attorney General may send a copy of my complaint, and any documents I provide, to the person or organization I mention in my complaint. I give that person or organization permission to provide information about my complaint to the Attorney General.
- The Attorney General may use information from my complaint to show that the law has been broken.
- The Attorney General works with other government agencies at the state, local, and federal levels to investigate complaints and with the police. The Attorney General may share my complaint with these agencies.

I affirm this 24th day of April, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment that:

- my complaint is true;
- any documents attached are true and accurate copies of the original; and
- I understand that this document may be filed in an action or proceeding in a court of law.

Signature

[REDACTED]

State of New York
Office of the Attorney General
The Capitol
Albany, NY 12224-0341

National Highway Traffic Safety Administration
Office Of Defects Investigation
West Bldg, 1200 New Jersey Ave SE
Washington, DC 20590-0001
(888) 327-4236

FIRST-CLASS



US POSTAGE



ZIP 12223 \$000.69⁰

02 7M 0008027933 APR 30 2025

2059030001 0000

