65. S.C. Code § 56-15-40(3)(d) states that is unlawful for any one "to resort to or use any false or misleading advertisement in connection with his business as such manufacturer, distributor, wholesaler, distributor branch or division, factory branch or division, or wholesale branch or division, or officer, agent or other representative thereof.

66. At all times relevant, the Toyota Defendants sold, marketed, advertised, distributed, and otherwise placed the above-listed Toyota vehicles, into the stream of commerce in an unlawful, unfair, fraudulent, and/or deceptive manner that was likely to deceive the public.

67. The Toyota Defendants' marketing of vehicles containing ETCS-i, without incorporating adequate electronic or mechanical fail safes, and while knowing the dangers of such vehicles, constitutes unlawful, unfair and/or deceptive acts and/or practices within the meaning of S.C. Code Ann. §§ 56-15-30 and 56-15-40.

68. The Toyota Defendant' attempts to cover up and hide from public and regulatory view the defects and the dangers posed by those defects, as well as its efforts to mislead Toyota owners by placing the focus on the floormat, constitutes unlawful, unfair and/or deceptive acts and/or practices within the meaning of S.C. Code Ann. §§ 56-15-30 and 56-15-40.

69. The Toyota Defendants' failure to warn the owners of its affected vehicles of the defects and the dangers posed by those defects constitutes unlawful acts and/or practices within the meaning S.C. Code Ann. § 56-15-10 et seq.

70. The Toyota Defendants' actions were, and are unfair and deceptive acts and practices.