80. The Defendants knew, or should have known, that the Subject Vehicles were unreasonably dangerous and defective, and had a propensity to cause serious injuries.

81. Notwithstanding the foregoing, the Defendants omitted material facts in the disclosures it made to the public and to consumers, including the Plaintiff and the Plaintiff Class Members herein, concerning the use and safety of the Subject Vehicles.

82. The Defendants have violated the New Jersey Consumer Fraud Act (N.J.S.A. 56:8-1 *et seq.*), in that they made untrue, deceptive, and/or misleading representations of material facts, and omitted and/or concealed material facts from the public, including the Plaintiff and the Plaintiff Class Members herein, concerning the use and safety of the Subject Vehicles.

83. The Defendants practice of promoting the Subject Vehicles created and/or reinforced a false impression as to their safety.

84. The Defendants practice of promoting the Subject Vehicles placed and continues to place all consumers of the Subject Vehicles at risk for serious injury.

85. The Defendants' statements and omissions were made with the intent that Plaintiff and the Plaintiff Class Members herein would rely on such statements and omissions.

86. The Plaintiff and the Plaintiff Class Members purchased and used the Subject Vehicles for personal, family, or household purposes and suffered ascertainable losses of money as a result of the Defendants' use or employment of the methods, acts, or practices alleged herein.

87. The aforesaid promotion, statements and/or omissions concerning the Subject Vehicles by the Defendants constitute an unconscionable commercial practice, deception, false pretense, misrepresentation, and/or knowing concealment, suppression, or omission of material facts with the intent that others rely upon such concealment, suppression, or omission in