are related to the pattern of racketeering and have taken place over many years, establishing both relatedness and continuity.

104. As a proximate result of the pattern of racketeering engaged in by Defendants, members of the class suffered damage to its property, including decreased value to their vehicles, loan and mortgage payments made on dangerously defective vehicles, repair costs, increased insurance deductibles and insurance, and the cost of loaner or replacement vehicles. Members of the class do not allege that this claim applies to any personal injuries that class members sustained because of Defendants' conduct. However, the claim does apply to economic damage caused.

COUNT II

Fraudulent Concealment and Fraud by Omission

105. Plaintiffs incorporate by reference and restate each and every allegation above as if fully rewritten herein.

106. Toyota has known since at least 2002 and possibly as early as 2000, and likely much earlier, that its vehicles were subject to sudden and unintended acceleration that placed occupants of its vehicles at great risk of death. Toyota was aware that there were fatalities in its vehicles because of unintended acceleration from 2002-09. Toyota knew that the risk of losing control of a vehicle in a high speed accident would be very frightening and dangerous to consumers and would cause Toyota's sales to decline. Toyota intentionally concealed the information, or acted with reckless disregard for the truth, and denied the consuming public information that is highly relevant to their purchasing decision. Toyota fraudulently concealed the information for years, because it was more important to Toyota to increase sales and become the largest manufacturer in the world. Toyota sacrificed innocent, trusting lives for profit and hubris.

TOY-TQ002-06-3D-00005506