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PROGRESSIVE

Tuesday February 22, 2004

CONSUMER AFFAIRS
SECTION

FEB 28 A8:27

3920 Advertight Road, Guite 175 Macon, GA 31210

P.O. Box 7829 Macon, GA 31209

Certified Mail Return Receipt

7062 2410 8097 8789 4519* 478 405-3700

K 478 405-3700 1-800-FROG/RESS/VE

Fecelula: 478-405-0478

progressive.com

Ford Motor Company PO Box 6248 M-D-3NE-B Dearborne, MI 48126

Attn: Consumer Affairs (800) 392-3673

RECEIVED

FEB 2 8 2005

Insured Name:

Policy Number:

Loss Date:

Claim Number:

VIN#:

1/17/05

05-5234158

1FMRU15W91L



To whom it may concern:

Our insured has made a claim for a total loss due to fire damage sustained to his 2001 Ford Expedition, that he purchased from Five Star Ford in Charlotte, NC.

To date, we have hired Cunningham Investigative Services (770) 978-1251 to determine the cause of the fire. At this time the investigation indicates that the fire started at the cruise control disconnect switch. We are willing to make arrangements to have your specialist work with Mr. Bill Knight of Cunningham Investigative Services on further testing.

As of today February 22, 2005, we have not yet made payment to **security and** for his total loss claim, but if and when we do Progressive Insurance has the legal right of recovery to the extent of our payment: thus we may be looking to you for reimbursement.

Before making a final liability decision, we want to complete our investigation. We appreciate your cooperation and look forward to hearing from you. If you have any questions regarding this claim, please contact me at (478) 405-3754.

Sincerely

Bill Bachner

SIU Special Investigator

Progressive Insurance

CC: Insured

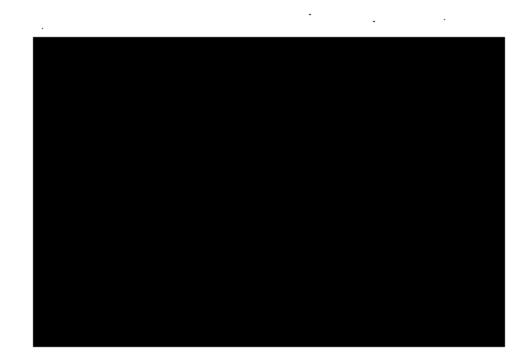
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State Farm County Mutual Insurance Company of Texas



February 21, 2005

P.O. Box 788011 Dellas, TX 75379-9011 (866) 861-0327 Fax - (888) 257-6076

Ford Motor Co. Shawn Norton 3 Parklane Blvd. Suite #300 Dearborn, MI 48126

RECEIVED TO L 8 700

RE: Claim Number: Date of Loss: Our Insured: Year/Make/Model: VIN:

2001 Ford Pickup F15 1FTRW07L51H

ORD MOTOR COMPLANT

Dear Mr. Norton:

This vehicle was insured by State Farm and involved in a comprehensive fire loss. The claim settled for \$18,845.40, which includes our insured's deductible.

Our investigation establishes the cause of loss was due to speed control deactivation switch that overheated.

Enclosed is our documentation. We will retain the evidence until we conclude this matter with your company. You may contact me to arrange for inspection of the vehicle.

Please consider this notice as our demand for reimbursement.

Pamela Davis - Team 8713 Claim Representative (866) 861-0327 Ext. 8713

State Farm County Mutual Insurance Company of Texas

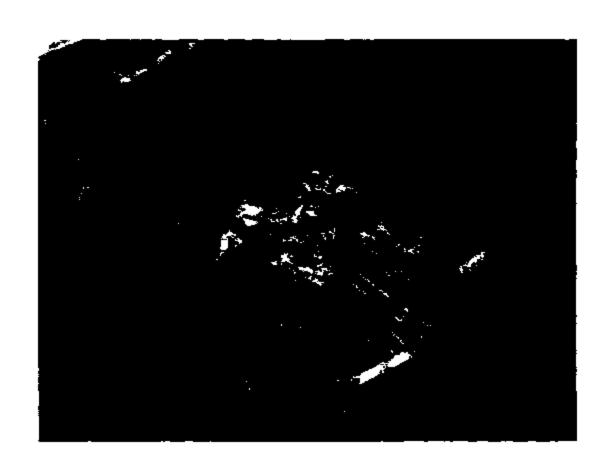
Enclosures

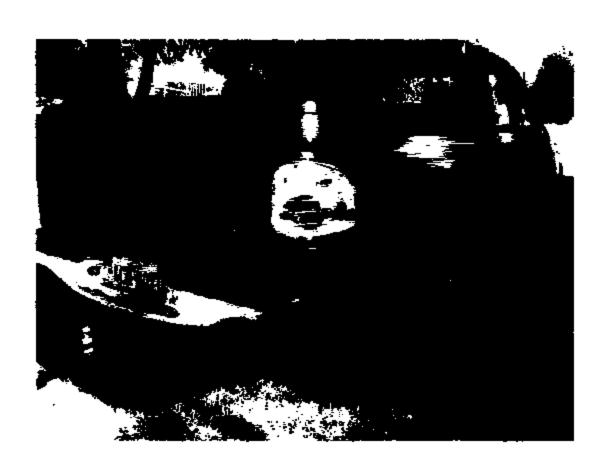
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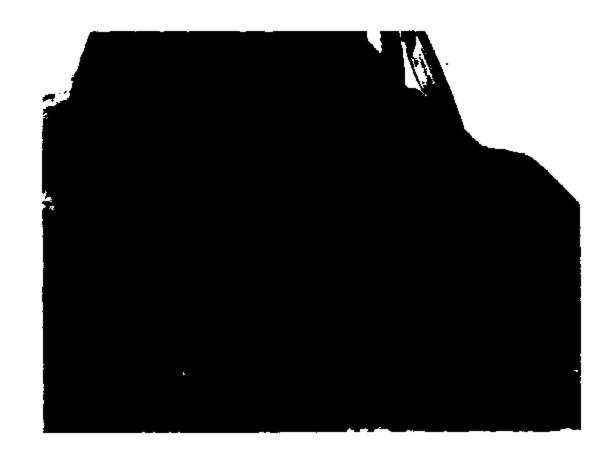














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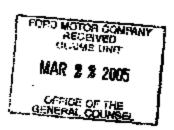
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Monday, Merch 14, 2005

FORD MOTOR COMPANY PARLAND TOWERS WEST #300 3 PARKLANE BLVD. DETROIT, MI 48126



Re PRODUCT DEFECT CAUSED VEHICLE FIRE AND RESULTING DAMAGES.

VIN:

1FTRW07LALK

Year:

2001

Make

FORD

Model:

F_140

Our Insured:

Address: Phone No.:

Our Claim No:

3-10-05

Date of Loss: Damages:

\$ 7,409.55

NOTICE OF SUBROGATION CLAIM

HOUSTON, TX

Please accept this letter as formal notice of our subregation rights in regard to the above-captioned claim. Demand is hereby made upon you for payment of Progressive's damages and those of Progressive's insured.

Our investigation indicates damages to our insured's vehicle was a direct result of a manufacturer's defect or negligence on your behalf. Enclosed please find all supporting documentation.

Please acknowledge receipt of my subrogation demand and forward your payment of \$7,409.55 to my attention, payable to "Progressive County Matual Insurance Company, as subroges of and mail to my attention at PO Box 43258, Richmond Hts., OH 44143.

You can contact me at the number listed below should you need additional documentation or care to discuss this claim.

Thank you for your anticipated cooperation.

Progressive County Mutual Insurance Company

William P. Klenzi Subrogation Representative (440) 603-7967

-47AP1 55 - 101F150 - WSO 4 17 100 ESP-NO



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SÁFEGO PROPERTY & CASUALTY INSURANCE COMPANIES

Horse State County Mutual Insurance Company Recovery Management 1315 North Highway Drive Fenton, MO 63099-1929 Phone: (800) 332-3226 Fax: (877) 215-6955

WMM.SELECT.COM

Mailing address: PO Box 461 St. Louis, MO 63166-0461

January 3, 2005

Ford Motor Company
Parklane Towers West Suite 300
Three Parklane Blvd
Dearborn, MI 48126-2568

BECEIVED

JAN 1 0 2005

Our Named Insured Our Claim Number:

Loss Date: VIN Number: August 10, 2004

IFMRU17L81

FINAD MOTOR COMPANY RECEIVED

JAN I 9 2005

CERICE OF THE BENERAL COUNSEL

To Whom It May Concern:

We have completed our investigation of the above loss. Our findings indicate that the fire that damaged our insured's vehicle was due to failure of the brake pressure switch. This switch was located on the master cylinder in the rear left driver side of the engine compartment. The failure of the brake pressure switch allowed brake fluid to leak into the energized electrical contacts and combust resulting in near by combustible materials to ignite prior to extinguishment.

Under the terms of our insured's policy with us, we have become legally subrogated to the right of our insured to recover. As such, we are seeking reimbursement from you for the damages we paid out on behalf of our insured.

Enclosed please find the documentation that will support our claim in the amount of \$16,761.86. In addition, our insured incurred deductible and/or out-of-pocket expenses totaling 1,018.53, bringing the total amount of the claim to \$17,726.39. If you have extended any payments(s) directly to our insured prior to receiving this demand, kindly notify us of such payment(s). Please forward payment to:

SAFECO Insurance Companies
St. Louis Branch Cashler (Subrogation)
P.O. Box 461
St. Louis, MO 63166-9970

© A registered tradement of the SAFECO corporately

CA1995 AF 7/02

~ \$10 | 04 dd 29)

If you have questions, please feel free to contact me and I will assist you in any way possible. Otherwise, we look forward to receiving payment for the above amount within 14 days.

Sincerely,

Diann Horrom

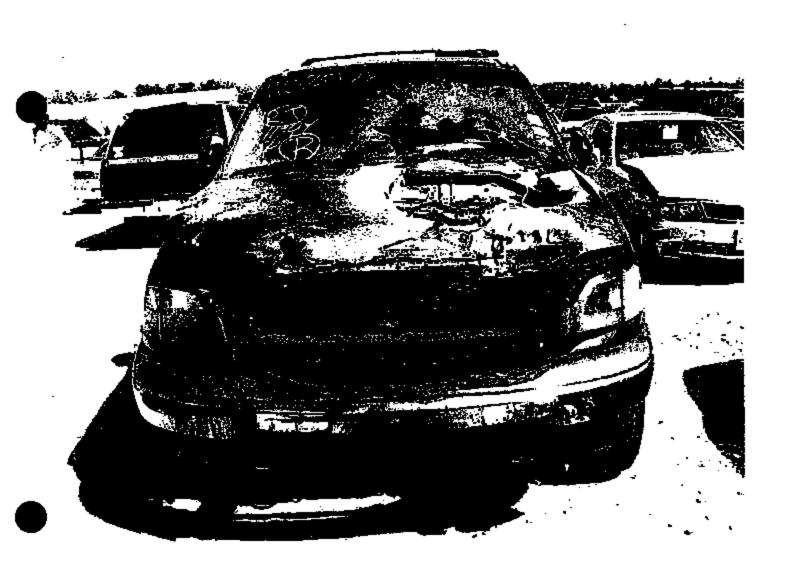
Recovery Management

Home State County Mutual Insurance Company

(800) 332-3226

Ext: 483180

dianho@safeco.com Fax: (877) 215-6955













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P-O. Box 2100 Bloomington, IL \$1702-2100 Altn: Subregation Unit

February 14, 2005

Ford Motor Company ATTN: Liability Dept. 330 Town Center Dr. Dearborn, MI 48126-2738

RR:

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Your File:

Recall# 05S28

Your Insured:

Ford Motor Company

Our Claim Number:

153-021796

Our Insured:

Date of Loss:

November 17, 2004

Amount of Damages:

\$1,248.34 COLLISION

<u>100.00</u>

DEDUCTIBLE

\$1,348.34



Dear Sir or Madam:

The result of our investigation of the above captioned incident indicates that your insured's negligence caused the damage to

This letter is to place you on notice of our subrogation or reimbursement recovery interest against you. Enclosed is our documentation to support our claim.

Please forward your draft made payable to COUNTRY Mutual Insurance Company® on behalf of to my attention at your earliest convenience. If you have any questions you may contact me at 1-309-821-5042. My office hours are 6:00 a.m. to 2:30 p.m. CST Monday through Priday.

Very truly yours,

COUNTRY Mutual Insurance Company®

Amy Kelly

Subrogation Specialist

AK/li

Enclosure

All Action Details for Issue

Print

VIN: 1FTRX17L8XX

Year: 1999

Model: F-SERIES WSD: 1999-03-03

Case: 1613130315

Name Symptom Desc: FIRE/SMOKE VISIBLE FLAME UNDERHOOD

Owner Status: Subsequent

Primary Phone:

Reason Desc: LEGAL - INSURANCE COMPANY SETTLEMENT

Secondary Phone:

Issue Type: 02 INFORMATION

lesus Status: CLOSED

Action: ADVISE CUSTOMER TO CONTACT THEIR INSURANCE COMPANY FOR ASSISTANCE

Dealer:

Origin Deec: US CONCERN CASE BASE

Odometer: 70000 Mil Analyst Name: HYLTON FIOSEMARIE Count Type: PHONE Analyst: PHYLTON2

Action Date: 01/31/2005

Action Time: 17.01.52.665

Action Deta: No.

Caller Information if Different From Vehicle Owner:

First Name LISA

Midde Initial

Last Narso LATTE

Day Phone 6189108459 Relationable SPOUSE

Community CUSTOMER SAID: -SHE IS CALLING ABOUT THE RECALL FOR THE CRUISE DEACTIVATION SWITCH -SHE HAD A PROBLEM WITH HER VEHICLE A MONTH AGO AND WOULD LIKE TO KNOW IF SHE CAN BE REPUNDED HER VEHICLE CAUGHT ON FIRE AND HAD \$1200 WORTH OF DAMAGE DOME TO IT-SHE TOOK IT TO WEIGMAN FORD AND WAS ADVISED. THAT THE PROBLEM WAS WITH THE CRUISE DEACTIVATION SWITCH -THERE WAS NO POLICE REPORT OR FIRE

MARSHALL REPORT -THEY PUT OUT THE FIRE WITH THE FIRE EXTINGUISHER-THERE WERE VISIBLE FLAMES COMING. FROM UNDERWEATH THE HOOD OF THE VEHICLE -THE VEHICLE TOTAL REPAIR WAS \$1280,39-THE PARTS WERE \$920,39 -LABOUR WAS \$360-SHE IS LOOKING FOR A REFUND OF THE DEDUCTIBLE OF \$100 AND \$14.63 FOR THE PART-THE SRV MGR AT THE TIME SAID THEY CALLED THIS IN TO FORD MOTOR COMPANYDEALER SAID: -THE SRV MGR AT THE TIME SAID THEY CALLED THIS IN TO FORD MOTOR COMPANYWIEGMAN FORD 125! WILLIAM ROCARLYLE, IL 62231TEL: (800) 244-1614CFIC ADVISED: • YOUR INSURANCE CONPANY HAS THE RIGHT TO PURBUE CLAIMS FOR REINBURSEMENT

AGAINST FORD, IF THEY DO PURSUÉ A CLAM AGAINST FORD THEY MAY ASK TO RECOVER THE DEDUCTIBLE AS WELL AS RETURN THE DEDUCTIBLE PAYMENT TO THE CUSTOMER-ADVISED CUST HER VEHICLE IS NOT INVOLVED IN ANY

RECALLS AT THIS TIME.



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National Document Center P.C. Box 268992 Oklahoma City, OK 73126-8992 claimadocument@farmeteinsurance.com

Fax: 877-217-1389

03/18/2005

Ford Motor Company Consumer Affairs Attn: Shawn Norton P O Box 6248 Dearborn, MI 48126

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
MAR 3 \$ 2005
OFFICE OF THE
GENERAL COMPANY

CONSUMER AFFAIR SECTION

Re

Our Insured: Loss Date: Claim Number:

01/13/2005

Total Amount Owed: \$8,605,25

Dear Ms. Norton,

A review of the facts of the above loss indicates that your product failed and caused damage to our insured's property. We have made payment to our insured for these damages, and now seek reimbursement from you. WE RESPECIFULLY ASK THAT YOU NOT RESPOND TO OUR REQUEST WITH A FORM LETTER.

You will find this correspondence and its enclosures contain substantive information and support adequate for your firm to make a decision concerning your liability. The vehicle will be available for your inspection during the next 60 days. Afterwards, we will be required to attempt to sell the salvage.

The entities in the stream of commerce, such as you, a manufacturer, are liable in both negligence and product liability. As you know, your obligation is to properly design and test, manufacture, and give appropriate instructions for installation and use of your product.

Your product did not meet the expectations of my insured, the consumer. Your product failed and caused the loss resulting in damages of 8,605.25. Attached are documents substantiating payment.

It is our desire to seale this claim without causing you the additional time and cost of litigation or arbitration. After reviewing the enclosed, please call me to discuss resolving this matter.

39 :U 91 855 157

BRUSSIA CHOO

Sincerely, Mid-Century Insurance Company of Texas

Sou SMI

Scott Sheffield Auto Subrogation Representative 512-238-5739

ENCLOSURES



Advanced Investigative Concepts Fire and Explosion Scene Analysis

Claim Number: 1906055245-1-2

Fire Investigation Report

Vehicle Fire

File Number: AIC-0330205-FAR

Prepared For.

Mid Century Insurance Company of Texas

Insured:

Loss Description.

1897 Ford Expedition
VIN: 1FMEU17L3VL

Attention:

Ms. Debi Pope
Claim Representative
Farmers Insurance Company
2505 Highway 360 North, Suite 500
Grand Prairie, Texas 75050

February 15, 2005

David Mark Howell, C.F.L/C.F.E.I. AIC Director / Senior Fire Consultant

Advanced investigation Concepttion for Bollow lear Dentes, Levas 70708 Letephone transistins (2) 1 for 1816), 215, 1935 pp., says Leman Marki for all a contract set

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Section I

Introduction

Ms. Debi Pope, Claims Representative, representing Mid Century Insurance Company of Texas, retained Advanced Investigative Concepts (AIC-Fire) on February 1, 2005 to determine the origin and cause of a vehicle fire loss that occurred on January 22, 2005.

The location of the 1997 Ford Expedition, when examined, was the A & E Towing fecility located at 6831 Old Randall Mili Road in Fort Worth, Texas.

AIC-Fire Senior Fire Consultant David Mark Howell, C.F.I. / C.F.E.I., conducted the vehicle examination on February 2, 2005.

Opinions and conclusions contained in this report are based on information available at the time of the investigation. In the future, if any other information, which could in any way impact or affect the conclusion contained herein becomes available; we will revise and amend our determination as deemed appropriate.

This report was prepared for the exclusive use of Mid Century Insurance Company of Texas and is not intended for any other purpose.

Section II

Origin and Cause

The fire originated in the driver's side rear of the engine compartment. The area of origin was centered on the brake master cylinder. It is suspected that the fire was caused by a defective cruise control deactivation switch that had been attached to the top of the master cylinder. No destructive disassembly of the components or wiring was undertaken, during this Investigator's inspection, due to spoliation of evidence concerns.

Section III

Fire Analysis

On February 2, 2005, this investigator examined the fire-damaged vehicle of Mr. Heriberto Valenzuela, the Insured. The 1997 Ford Expedition was located at the A & E Towing facility at 6831 Old Randell Mill Road in Fort Worth, Texas when inspected. The vehicle was damaged by fire on Saturday, January 22, 2005.

Vehicle Analysis:

Examination, of the vehicle, was begun on the exterior (front) and continued clockwise systematically. The vehicle was examined on the interior from the least burned areas to the point of origin. Digital photography was used to document the damaged vehicle.

The front of the 1997 Ford Expedition austained heavy fire damage. The front grit and headlight assemblies had been mostly consumed as had the combustible bumper covering. The fire damage to the front, of the vehicle, was found to be the most severe on the driver's side. The aluminum hood, of the vehicle, had been mostly consumed. There were remnants of the aluminum still found along the front edge of the vehicle. The radiator sustained the heaviest fire damage on the driver's side. The fire had originated in the engine compartment and had spread into the passenger compartment thru the firewall after it had breached the windshield. The bum patterns indicated that when the vehicle had burned there was a slight breeze which had pushed the fire from the engine compartment to the passenger's side. There was a small amount of windshield glass left in the driver's side of the windshield opening. The driver's side mirror was found intact, but the passenger's side was melted from the door (Photograph 1).

The burn patterns on the passenger's side, of the vehicle, again indicated that the fire had originated in the engine compartment. The passenger's side front the was

still inflated despite being heat damaged. The fire had vented under the front fender well and then extended rearward damaging the passenger's side front door. The passenger's side front door glass had been breached by the heat. There was no fire damage found behind the front door on the passenger's side exterior of the vehicle. The window glass, in the rear door and cargo area window, were found intact, but had sustained an accumulation of smoke stains and soot to the interior surfaces. The rear tire and wheel matched those found on the front. The wheels were factory Ford equipment (Photograph 2).

The window glass on the rear hatch had been breached. It is unknown if it had been breached by the fire or if it was done by the firefighters. The fire had not vented out thru the opening which suggested that the firefighters had breached the opening in an attempt to access and extinguish the fire. The remainder of the hatch was found in relatively good condition. There was no body damage noted to the passenger's side or rear of the vehicle. Texas license plate was affixed to the rear bumper (Photograph 3).

The driver's side, of the vehicle, was found in a condition similar to that of the passenger's side. The rear tire was the same brand as the other three found on the vehicle, but it was not a white letter series. The window glass on the driver's side rear dargo area and the rear door window was found intact. Again, there was a heavy accumulation of smoke stains and soot to the interior surfaces of the glass. There was no major collision damage found on the driver's side of the vehicle. Burn patterns were found that were similar to those found on the passenger's side. The driver's door window had been breached during the event (<u>Photograph 4</u>).

There was stereo equipment found inside the rear cargo area that had had been destroyed by the heat of the fire. The headliner had metted and fallen from roof and had been partially consumed. The burn damage to the rear cargo area

indicated that the fire had traveled under the roof from the front of the vehicle (<u>Photograph 5</u>).

The rear seating area was found to be burned from the top downward. The carpeting and lower seats were found intact. All of the damage suggested that the fire had entered thru the windshield and had traveled under the roofline (Photograph 6).

The front seating area was found in the same condition with the seats being burned from the tops of the headrests downward. The dashboard had sustained heavy fire damage from the top edge downward (<u>Photograph 7</u>).

As aforementioned, the burn patterns around the windshield suggested that the fire's travel was controlled by ventilation. The passenger's side windshield post had been damaged more severely than had the driver's side post. Again, the top of the dash components were heavily damaged by the fire once it breached the windshield (Photograph 8).

As aforementioned, the passenger's side front tire was still inflated. The fire had burned under the fender well. There was heavy oxidation noted above the tire and wheel on the fender. However, there were still combustible materials on the front bumper, headlight assembly, and to the rear of the front tire which indicated that the fire had burned thru the hood, of the vehicle, more so that under the fender well (Photograph 9).

The driver's side front tire was deflated as a result of damage caused by the fire. There was heavier fire damage noted around the front fender with consumption of the lower combustible materials around the tire. Again, ventilation patterns had pushed the low burning fire toward the passenger's side (<u>Photograph 10</u>).

The battery and power cables were located on the passenger's side of the engine compertment. There was heavy fire damage noted to the engine compartment.

There was more damage and more consumption of the combustibles located on the driver's side of the engine compartment. The radiator and the oil cooler had malted and consumed to a greater degree on the driver's side. All of the plastic air intake assembly had been consumed. The battery sustained heat damage from the top side downward (Photograph 11).

The fiberglass based valve covers had been partially consumed. The driver's side had sustained the heaviest fire damage. Again, the driver's side of the aluminum radiator had sustained the heaviest fire damage. Most of the combustibles on the driver's side had also been consumed. It is this Investigator's opinion that the fire had been most intense and severe on the driver's side of the engine compartment (Photograph 12).

All of the battery cables and power wires to the starter and alternator were examined. There were no electrical faults noted. Again, the battery sustained heavy fire damage from exposure to the fire. There was a large wiring harness that ran along the firewell from the passenger's side to the driver's side. The insulation had been malted from the wires. However; there were no major electrical faults noted (<u>Photograph 13</u>).

The wiring harness terminated inside the electrical distribution panel which was located beside the area of origin, inside the driver's side fender. The master cylinder had been melted from its attachment bolts and was not found with the vehicle. There were remnants of aluminum, from the master cylinder, found on the undercarriage which suggested that it had been consumed. The area of origin was located around the brake master cylinder which indicated that it had been the point of origin. The cruise control deactivation switch had been consumed and the wiring in the area of origin was very brittle and had sustained heat stress. It is this investigator's opinion that the fire was caused by a faulty cruise control deactivation switch. The burn patterns placed the origin of the fire at the master cylinder where

Ford Motor Company had experienced numerous previous fires. All of the burn patterns were similar to those found on previously inspected vehicles that had a faulty cruise control deactivation switch. It is this investigator's opinion that a representative from Ford Motor Company should be allowed to inspect the vehicle before any further examination is undertaken.

Conclusion:

in conclusion, based on the vehicle fire examination, this investigator has determined the fire originated in the driver's side rear of the engine compartment. The area of origin was centered on the brake master cylinder. It is suspected that the fire was caused by a defective cruise control deactivation switch that had been attached to the top of the master cylinder. No destructive disassembly of the components or wiring was undertaken, during this investigator's inspection, due to spollation of evidence concerns.

Section IV

Overview

- 1. The fire-damaged vehicle was analyzed and photographed.
- 2. The Ford Motor Company recall campaign information was reviewed.
- The pertinent data was compiled and evaluated. This fire report was written after all available information was received and a determination of the origin and cause of the fire was made.

Section V Attachments

Section V Attachment A Ford Recall Campaign Information

Section V
Attachment B
Photographs

Photography Log

Photograph 1: Front of the 1997 Ford Expedition

Photograph 2: Passenger's side of the vehicle

Photograph 3: Rear of the Expedition

Photograph 4: Driver's side of the vehicle

Photograph 5: Rear cargo area of vehicle

Photograph 6: Rear seating area

Photograph 7: Front seating area

Photograph 8: Windshield and dash area

Photograph 9: Passenger's side front fender, wheel, and tire

Photograph 10: Driver's side front fender, wheel, and tire

Photograph 11: Engine compartment, passenger's side view

Photograph 12: Driver's side view of engine compartment

Photograph 13: Battery and battery cables

Photograph 14: Area of origin around brake master cylinder

Section V

Attachment C

Fire Consultant Curriculum Vitae

Mark Howell, C.F.I., Senior Fire Consultant Curriculum Vitee and Training

David "Mark" Howell is Director and Senior Fire Consultant of Advanced Investigative Concepts, Inc.; a Texas licensed private investigation company specializing in fire origin and cause investigations. Mark has over twenty-eight years experience in this fire service and has served as a Firefighter/Peremedic and the Fire/Arson investigator for the Corrollion, Texas Fire Department, in 2000, after serving eight-years as the Fire & Arson investigator for the City of Carrollion, Texas, he was appointed Special Deputy United States Marshal and assigned to the United States Treasury, Bureau of Alcohol, Tobecco and Firearms, Dallas Group II Bomb and Arson Task Force. Mark retired in 2002 from the municipal fire service and \$ne ATF test force.

Mark holds both the Certified Fire Investigator (CFI) certificate from the International Association of Asson Investigators and the Certified Fire and Explosives Investigator (CFEI) pertificate from the National Association of Fire Investigators. With Certoliton, he was a State of Texas certified Advanced Firefighter, Advanced Arson Investigator, Intermediate Instructor, Peace Officer and Fire Inspector. He is Owner/Director of Advanced Concepts in Training, a seminar production company specializing in fire related topics and has coordinated numerous workshops and seminars in North Texas. Mark has investigated over 1000 fires and has testified as an expert witness in state and federal criminal arson related trials. Also, he has given several civil depositions referencing fire investigations and has testified as an expert witness in civil court.

Mark is past-president of the North Texas Fire Investigators' Association (NTFIA) and has served several years as NTFIA Secretary/Treasurer. He is a current Director of A Texas Advisory Council on Arson (ATAC). Besides his affiliation with NTFIA and ATAC, Mark holds memberships in the international Association of Arson investigators (IAAI) and the Texas Chapter of IAAI, the National Association of Fire Investigators, and until retrement, the North Texas Chapter of International Association of Special Investigative Units, the Texas Police Association, and the International Association of Firefighters.

Mark's accolades include being nominated in 1996 by A.T.F. Dallas Group II supervisors as the National Association of Police Organization's national award of "Top Cop" and, he has twice been presented the Excellence in Service award and once the Carrollton Ambassador award by the City of Carrollton along with numerous commendations.

Mark Howell, C.F.L., Senior Fire Consultant

Training:

1974 to 2002, Carrollton Texas Fire Department; Firefighter

1988 to 2000, Emergency Medical Education; Director/Instructor

1994 to 2002, Advanced Concepts in Training; Director/Instructor

1990, Emergency Resource; Surviving the Hazardous Materials Incident

1991, Texas Engineering Extension Service; Methods of Teaching

1991, National Fire Academy; Hazardous Material Responder

1991, Texas Commission on Fire Protection Personnel Standards and Education; Intermediate Instructor

1993, Appointed Fire & Arson Investigator for the City of Carrellton, Texas.

Police Academy: 1993, North Central Texas Council of Governments Regional Police

Academy, Basic Course in Applied Police Science - Peace Officer

1993, Texas Engineering Extension Service, The Texas A&M University System

Criminal Justice Academy; Standardized Field Sobriety Testing

1993, National Academy for Professional Driving: Tactical Police Oriving

1993, Public Agency Training Council; Kinesic Interview and Interrogation Techniques Arson / Fire Investigation Academy: 1993, Datas County Fire Academy; Fire & Arson Investigation (Fire and Arson Investigator Certification Course)

1993, Texas Commission on Fire Protection Personnel-Standards and Education; Investigator

1993, Carrotton Police Department, Crime Scene Search

1993, Texas Engineering Extension Service, The Texas A&M University System Fire Protection Training Division; Ignition To Trial

1993, National Fire Academy; Instructional Techniques for Company Officers

1994, Carrotton Fire Department, Crime Scene / Arson investigation Photography

1994, International Association of Arson Investigators; Fire Investigation Theory Applied to Live Burns

1994, Texas Engineering Extension Service, The Texas A&M University System Fire Protection Training Division; 39th Annual Texas Fire and Arson Investigators Seminar 1994, Department of the Tressury, Bureau of Alcohol, Tobacco and Firearms National Academy, Glynco, GA.; Advanced Arson for Profit Course

1994, Federal Bureau of Investigation's Law Enforcement Officers Training School; Photography

1994, Cellular Telecommunications Industry Association, Washington, D.C.; Cellular Fraud Awareness and Prevention Training

1994, Public Agency Training Council; Advanced Kinesic Interview Interrogation Techniques

1994, International Fire Code Institute; Uniform Fire Code Update

1995, North Texas Fire Investigators' Association, Secretary

1995, Texas Engineering Extension Service, The Texas A&M University System; 40th Annual Texas Fire and Arson Investigators Seminar

1995, International Training Association; Advanced Cause and Origin\Expert Witness 1995, National Association of Fire Investigators; Determining the Cause and Origin of Fires and Explosions Training Seminar, Chicago, IL.

- 1995, Lewisville Fire Department, Ordinance / Explosive Recognition
- 1995, International Association of Arson Investigators; Juvenile Firasetting Intervention
- 1996, North Texas Fire Investigators' Association, 2st Vice-President
- 1996, Texas Commission on Fire Protection Personnel Standards and Education; Fire and Arson Investigator Intermediate
- 1996 to 2002, Texas Commission on Fire Protection Personnel Standards and Education; Fire and Arson Investigator Advanced
- 1996, institute of Criminal Justice Studies; Juvenile Law for Street Officers
- 1996, International Training Association; Practical Bomb and Explosive Device Investigations
- 1997, North Texas Fire Investigators' Association, 1st Vice-President
- 1997, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Arson Investigators Seminar
- 1997, North Central Texas Council of Governments Regional Police Academy; Cultural Diversity
- 1997 to 2001, Texas Commission on Fire Protection Personnel Standards and Education; Fire Inspector
- 1997, North Central Texas Council of Governments Regional Police Academy; Special Investigative Topics
- 1997, International Association of Special Investigation Units; I.A.S.I.U. Seminar
- 1997, North Texas Fire Investigators' Associations; Advanced Concepts in Fire Investigations
- 1997, Massachusetts State-Wide Coalition for Juvenile Firesetter Intervention Programs; Massachusetts Juvenile Firesetter Intervention Program
- 1997, Office of the Governor; Writing to Win
- 1998, North Texas Fire Investigators' Association, President
- 1998. Collin County Criminal District Attorney's Office; Texas Homicide Symposium
- 1996, The Texas A&M University System, Texas Engineering Extension Service Fire
- Protection Training Division; Texas Fire and Arson Investigators Seminar
- 1996, U.S. Department of Justice, F.B.I.; Interviewing & Interrogation Techniques
- 1998, The Texas A&M University System; Determination: Arson, How to Investigate the
- 1998, North Texas Fire Investigators' Association; A Basic Fire Investigation
- 1999, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division: Texas Fire and Arson Investigators Seminar
- 1999, A Texas Advisory Council on Arson; Explosive Recognition & Interviewing
- Techniques
- 1999, State of Texas, Office of the State Fire Marshal; Juvenile Firesetter Intervention Program
- 1999, North Texas Fire Investigators' Association; Analytical Interviewing Techniques
- 2000, North Texas Fire Investigators' Association, Secretary/Treasurer
- 2000 to 2002, United States Treasury, Sureau of Alcohol, Tobacco and Firearms, Dallas. Group II Bomb and Arson Task Force; Investigator
- 2000, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Arson Investigators Seminar
- 2000, Texas Chapters of IASIU; Here and Beyond 2000

2000, North Texas Fire Investigators' Association; NFPA 921 Series, Basic Methodology, Recording the Scene, & Explosions

2000 to 2002, United States Department of Justice, United States Marshal's Service; Special Deputy United States Marshal,

2000 to present, Texas Commission on Private Security, Investigation Company Owner (Advanced Investigative Concepts, Lic. # A10050)

2000 to present, Texas Commission on Private Security; Owner/Manager, Lic. # 9424

2001, North Texas Fire Investigators' Association, Secretary/Treasurer

2001 to present, National Association of Fire Investigators; Certified Fire and Explosion Investigator

2001, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Arson Investigators Seminar

2001, The North Texas Fire investigators' Association; NFPA 921 Series, Fire Patterns. Legal Considerations, & Investigation of Motor Vehicle Fires

2001, United States Treasury, Bureau of Alcohol, Tobacco and Firearms; Advanced Explosives investigative Techniques course

2001. The North Texas Fire Investigators' Association, NFPA 921 Series, Electricity & Fire, and Appliance Failures

2001, International Association Somb Technicians and Investigators; Advanced Improvised Explosive Devices and Terrorist Activities Regional Training

2002, Instructor, North Texas Chapter International Association of Special Investigative

Units; Fraud Focus 2002, Fatebly Fire Investigations

2002, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Areon Investigators Seminar 2002 to present, international Association of Amon investigators; Certified Fire Investigator

2002, Instructor, State Farm University, Fire Related Appliance Failures

2002, A Texas Advisory Council on Arson (ATAC), Director

2002, Instructor, Metropolitan Home and Auto, Fire Investigations

2002, Instructor, State Farm Insurance Company, Burn Patiern Recognition

2002, A Texas Advisory Council on Arson, Trial Preparation

2002, 19th Annual East Texas Arson Investigators' Seminar, Electrical Fire Investigation

2003, Instructor, NICB & State Farm Insurance, 8th Annual Conference

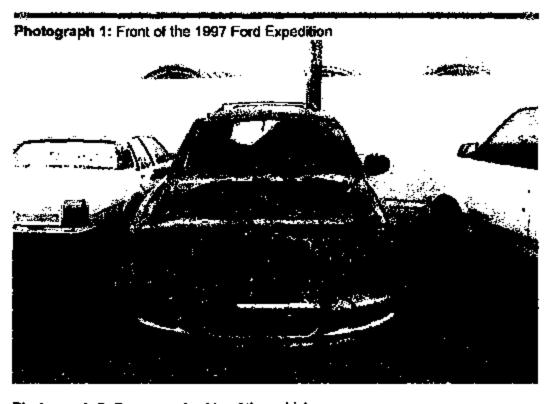
2003, Instructor, Nationwide Insurance Company, Fire and Explosion Investigations

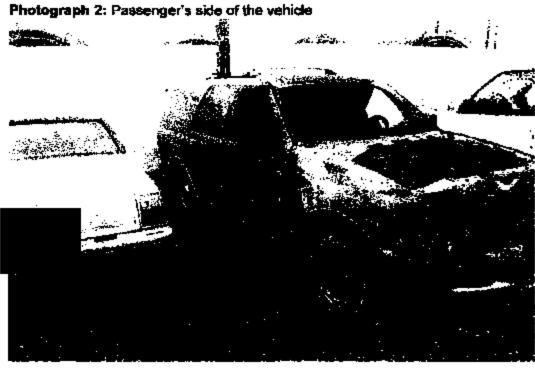
2003, Instructor, State Farm Insurance Company, Fire Scene Investigations

2003, Instructor, Republic Insurance Company, Fire and Death Investigations

2004, Instructor, North Texas Chapter International Association of Special Investigative Units Fraud Seminar; Structure and Vehicle Fire Investigations

Note: Bold denotes major schools, certifications, licenses, or appointments



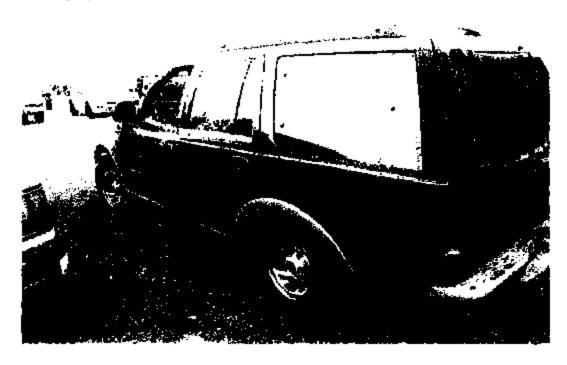


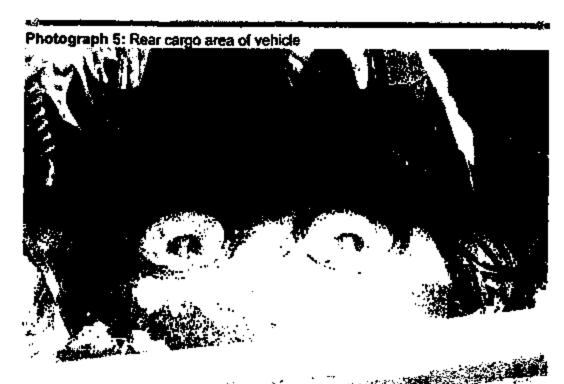
Photographs

Photograph 3: Rear of the Expedition

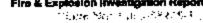


Photograph 4: Driver's side of the vehicle

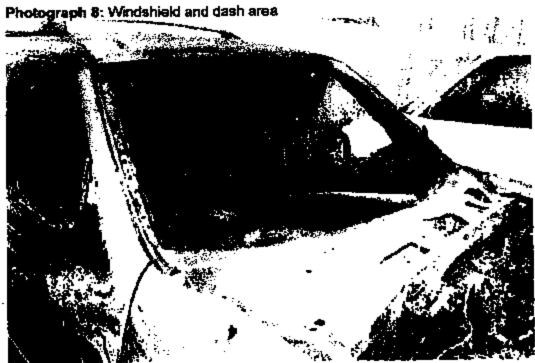


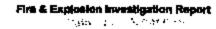


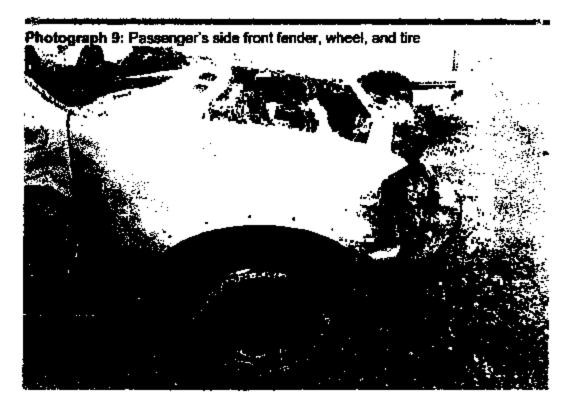


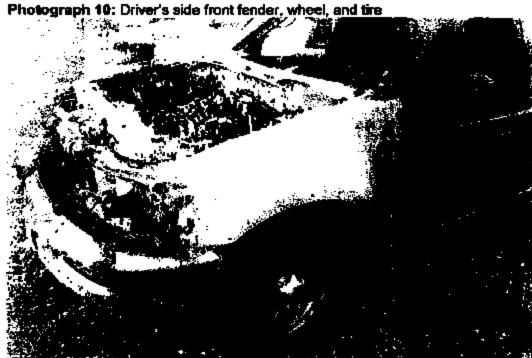




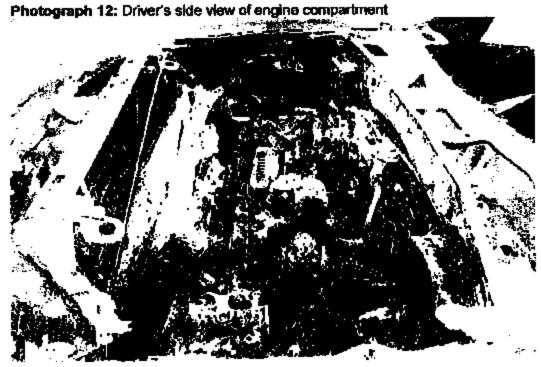


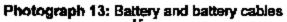














Photograph 14: Area of origin around brake master cylinder





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Friday, March 18, 2005

FORD MOTOR COMPANY
PARKLAND TOWERS WEST #300
3 PARKLANE BLVD,
DEARBORN, MI 48126

MAR 2 9 2005

OFFICE OF THE

Re:

PRODUCT DEFECT CAUSED VEHICLE FIRE AND RESULTING DAMAGES.

VIN:

1FTRX07L4YK

Year:

1999

Make:

FORD

Modek

T-150

Our Insured: Address:

GRANADA HILLS, CA

Phone No.:

(818)832-0042 043543534

Our Claim No: Date of Loss:

8-10-04

Damages:

\$ 9,400.45

NOTICE OF SUBROGATION CLAIM

Please accept this letter as formal notice of our subrogation rights in regard to the above-captioned claim. Demand is hereby made upon you for payment of Progressive's damages and those of Progressive's insured.

Our investigation indicates damages to our insured's vehicle was a direct result of a manufacturer's defect or negligence on your hebalf. Enclosed please find all supporting documentation.

Please acknowledge receipt of my subrogation demand and forward your payment of \$9,460.45 to my attention, payable to "Progressive Casualty Insurance Company, as subrogee of the state of the mail to my attention at PO Box 43258, Richmond Ifts., OH 44143.

You can contact me at the number listed below should you need additional documentation or care to discuss this claim.

Thank you for your anticipated cooperation.

Progressive Casualty Insurance Company

William P. Kienzi Subrogation Representative (440) 603-7967

Alf Action Details for leave

2nnt

VIN: (ETEXO7) AYM

Year: 2000

Model: F-8EFIES

Case: 687040315

Symptom Desc: FIRE/SMOKE VISIBLE FLAME

Owner Status: Original

WSD: 2000-02-21

Primary Phone

Remain Desc: LEGAL - INSURANCE COMPANY SETTLEMENT

Issue Type: 02 INFORMATION

lesue Status: CLOSED

Secondary Phone:

ACTION: ADVISE CUSTOMER TO CONTACT THEIR INSURANCE COMPANY FOR ASSISTANCE

Dealer:

Origin Desc: US CONCERN CASE BASE

Odometer: 116000 MI

Comm Type: PHONE

Analyst Name: YOUNG AMANDA ROSE

Analyst: AYOUNG75

Action Date: 01/31/2005

Action Time: 19.05.09.516

Action Date: No

Comments Customer said: - Cust had maintenance completed on Veh For \$1800 - Two days later the Veh BURNT TO THE GROUND IN AUGUST 2004-CUST PUT CLAIM THROUGH INSURANCE COMPANY AND WAS ONLY GIVEN BLUE BOOK VALUE A VEH THAT WAS IN MINT CONDITION - CUST RECENTLY HEARD THAT THERE WAS A RECALL FOR THIS ISSUE- CUST CHECKED ON WEBSITE WITH VIN AND FOUND THAT THE SPEED CONTROL RECALL IS ACTIVE ON THIS VIEH - CUST SEEKING TO FIND OUT HOW TO BEST HANDLE THIS SITUATIONDEALER SAID: -HONECRC ADVISED: - YOUR INBURNACE COMPANY HAS THE RIGHT TO PURSUE CLAIMS FOR REIMBURSEMENT AGAINST FORD. FORD IS UNABLE TO INVESTIGATE THE VEHICLE AS REPAIRS HAVE BEEN PERFORMED.--CSR ADVISED CUST AS ABOVE



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MICHAEL B. JOLLY ATTORNEY AT LAW

405 Main, Stille 1000 Houston, Tieses 77002

RECEIVED MITERIAL ATTRIBUTEY

F{8 9 2005

(713) 237-8389 Fax (719) 237-8385 mikejally#aol.com

February 9, 2005

Kethisen Horchier Peter Kelisti

Via Fac 248-203-0763

Deborah Bullion

Via Fax: 281-340-7001

Erio Mayer

Via Fee: 713-654-6666

Andrew Schlemeister Dans S. Speer

Via Fat: 713-228-3610

RE:

Sealy, Texas

1**995** Ford F-1<u>50</u>

Vehicle: Vin No.:

1FTEX15Y38

Date Fire:

4-1-2004



Dear Counselt

i representations regarding a time which occurred in the above identified Food vehicle which was fitted with a detective speed control descrivetion switch. The time destroyed his Ford vehicle, but lucidly no other property. Let me know if you would like leser copies of photographs of the vehicle in question.

truck is available for inspection at the following location:

Mile Mechala's Wrecking Yard 524 Jurica Road Sealy, Texas 77474 979-885-4711

are photographs of ruck se soon se possible.

burned up pick up truck. Let no know when and who will be inspecting

- 4/1/04

MU1 - 195 F-150

Enclosures - VIIV

- WGO. 2/13/95

- ESP-NU

TOTAL P.OL



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ALEXANDER CLAIM SERVICE, INC.

ALL LINES ADJUSTERS

egy jan 19

Mamber of Texas Independent Adjustes Association

P.O. Box 6026 Abilage, TX 79686 (228)-695-2480 (325)-695-2633FAX

DIMER AFFAIRS

alexelms@nts-online.net

September 16, 2004

4 SEP 21 F1:02

Ford Motor Company. Consumer Affairs P.O. Box 6248 MD-3NE-B Dearborn, MI 48126

Attn: Subrogation Dept.

FORD MOTOR COMPANY
HEDEIVED
CLAIMS UNIT
SEP 2 2 2004

OFFICE OF THE
GENERAL COMPSET

Re: Auto Fire 8-28-2004

Gentlemen:

Per environer lines have been paid on 1995 Ford F-150, VINE:1FTEX15H9SK owned by comparison of fire which occurred in engine compariment as a result of cruise control switch matturictioning, with fire ensuing.

Enclosed documentation outlines repair cost of \$900.99 less deduction for defective part netting a loss of \$873.04 subject to \$500.00 deductible. Payment of \$373.04 has been extended to the policyholder.

As a result of this detect/majfunction, we hereby present claim for reimbursement of monies paid as well as the policyholder's deductible.

Sincerely.

WORTH CASUALTY COMPANY By Alexander Clean Service, Inc.

Don DePron Adjuster

DD:ami



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State Farm Insurance Companies



P. Q. Box 799013 Dallas, TX 75379-9013

December 6, 2001

Ford Motor Parkelane Towers West, ste. 400 3 Parkelane Blvd. Dearborn, MI 48126

RE: Claim Number:

Date of Loss: Our Insured: Make/Model/Year:

43-R790-938

September 30, 2001 Jennifer A. Reynolds 1997 ford Expedition

1FMFU18L5VE



Dear Ford Motor:

This vehicle was insured by State Farm and involved in a comprehensive loss. The claim settled for \$21,744.44, which includes our insured's deductible.

Our investigation establishes the cause of loss was due to the brake pressure switch.

Enclosed is our documentation. We will retain the evidence until we conclude this matter with your company. You may contact me to arrange for inspection of the vehicle.

Please consider this notice as our demand for reimbursement.

Sincerely,

Tonya Bedell Claum Specialist

Subrogation Unit/Team 40

(972) 732-4842

State Farm Mutual Automobile Insurance Company

Your acceptance of our request for your services and your performance of those services are expressly conditioned on and subject to your agreement that: (1) you will not use customer information we provide for any purpose other than the specific services we are asking you to perform, and (2) you will disclose

HOME OFFICES: BLOOMINGTON, BLINOIS 61710-0001

Page 2 .
 December 6, 2001

or share customer information we provide only to the extent necessary to accomplish the services that we request.

MITCHELL

10/3/01 10:59 PAGE 5/6 Witchell FAX Server

VEHICLE INSPECTIGE REPORT / TOTAL LOSS SETT FMENT REPORT

Chin Number		Chin Representative PLANO, TX CS	<u> </u>	- v 6		Clajer Unil	47	2				
		Phone Number				FAX Number						
Reg 144		Logg Code		e la di Loca	Ţ	ata Report	-					
Location Address		1312		9/30/D1	Tonin	<u> 9-3</u>	Ø − C oage Pe	21				
@710E001-97 FORD EXPEDITION SPORT,								,				
Cause of Loss Comprehensive												
VEHICLE DESCRIPTION Vahide Outclution (Comparison Date 15th to 15t												
1997 Ford Expedition Eddle Bauer 4D Ut 1	197 WB					Exiper6or		TX (
VIN TEMFU18L5VL			Exterior Calo	BLACK	ndigelen) IAT							
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•	Air Conditioning			Power States								
	TH Steeding Wilsons			Power Windows								
	Cruise Control		- ł	Penser Door Lacks								
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	Russing Boards			Single Educati	t							
	Trafofity Package		ł	Fuel Jejectice								
	Fag Lights)					ļ				
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10:59 PAGE 8/8

Mitchell FAX Server

	PRE-LOSS CONDITION			
INTERIOR:	(Explain II other than everage condition for year, make and model relation)	Above Avg	Avg	Below Avg
Seats:		_ □	()	
: Carpets		_ 🛚	X	
Glass		_ □	Ξ	
, Dash:			1	
HeadBran			X.	
EXTERIOR:	(Explain if other than average condition for year, sealer and model visibile)			
Sheet Malai:		_ □	X	
Paint	<u> </u>	🗅	E	
Trim:			E	
MECHANICAL	(Supplied & other than wearage condition for your, make and madel vehicle)	_	_	_
Engine:		_ 🗆	X	
Transmission:		□	₹.	
PRIOR DAMAGE	E ☐ Yes INo Estimate Written: ☐ Yes INo Amount	Damage L	ocaton:	F
OVERALL COM	L L L L L	ISTER RAY		10/03/01
Şalvage Will Be	: ☐ Rebuilt 🙀 Sold for parts ☐ Scrapped	CTED BY		DATE
	TOTAL COSS SETTLEMENT			
Method used to d	and the second second	mparable Vehicle • • • • • • • •	5 D	Book Value
:	Vendor Name: <u>Valuu</u>	<u>umati</u>	Amount	r <u>iap<i>50</i>:</u>
Did you pay the o	areputentzed evaluation armount? Yes Who ill no, explain:			10025
	/ / JUL (2 /	Adjusted Am	ount	14,420
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2.	 		+	┿
	used to defermine turns price: [1. [2. [3.			
Explain any adjusts	nants for difference is mileage, equipment condition, prior éssange, etc.	4-15		
<u> </u>	Adjusted Amount			
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List additions o	r deductions for equipment, mileage, etc, and prior damage:	Adjusted A	mount	
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Fees	24.13 Date Sold			
Actual Cash Val				
Owner Retainer	1			
Qeductible		Xsposition of Title:	:	
Llamholder Pays				
Amount Paid O	wher \$ 19,404,59 Microbineto Species			
Date Settled	(D)(H)(A) Het Salvage Return \$	Date:	_	
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	1 1 4	シーフレビー・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・	M II -	111/11/

trainbursed #25 True way



#2



















#27



ER65-895-LC-3423

























INSPECTION INFORMATION

Inspection Date: 10-11-01 Vehicle Location: Copart T/L or Repairable? Total Loss Repairs Complete? N/A

Appears cause of loss was brake pressure switch Inspector Findings:

Expert Hired? Yes

Name: Address: City, State, Zip:

Expert's Findings: Fire originated within the brake pressure switch and associated

Responsible Party: Manufacturer Name:

Ford Motor Company Address:

City, State, Zip: Expert for Above:

Has Vehicle Been Inspected By Liable Party? N/A When? Have They Accepted Liability? No

Yes Is Vehicle Inspection Completed? Yes Copart Is Vehicle/Parts Secured? Where? Confirmed 7106301 Lot Number? Safeguard?

Parts been ID'd and Tagged? N/A. N/A Where?

FILE INFORMATION

No Has File Been Moved to Subrogation? If No, State Reason: N/A

Additional Details to Be Addressed: Pay expect per invoice, pursue subrogation

against Ford, dispose of salvage when

bredling concluded.

- Nok: Econ loss document apply, CO3 lost.

CALLAS FIRE DEPARTME(FIRE ALARA FERGAT

INCIDENTERSATES SEVECTA: ON DATE 09/380/2801 FGX: 168% WG. 45% BERGE OF SEVECTA OF SEVER OF S FUSIRESS: X SINEET. TULBRE 100 MDAS ADD: CLASS CODE: ATTNO PGS: MSAG PHUML: MSAJ LSCAFICN: MBAS BUG: FLASF COMMENTS: THUSE COMMENTS: OTHER COMMENTS: TIME DISPATCHED NY 2013A SOURCE OF CALL: TEL PHONE TIME ARRIVED :177.05:24 FIRST COMPANY EN27 TIME 157 ENG 99:97 NO FARST ENGINE : DOLLAR LOSS: N TIME IND 99 77:57 TIME GREET 47:1 99:59:57 11:16 67:4 199:59:57 11:16 67:4 199:59:57 11:16 67:4 199:59:57 SUSPICIOUS CRIGIN : N SHIFT: A DISTRICT # : 07 CHIEF: 97 DISPAICHER : 21 HAZ MAT : N FCI : N MCI : N AIR : N TIME GUT TAPE :59:57:99 MANUAL DISPATCH : TROCKS CHIEF WA BU RE BY ATOL White h ENGINES 15T 27



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SAFECO PROPERTY & CASUALTY INSURANCE COMPANIES

First National Insurance Company of America Mailtend 2201 Lucies Way, Suite 300

Maitfand, Fl 32751

Phone: (690) 332-3226 (800) 332-3226 Fax: (407) 875-7851

220 Lacien Way , Suite 300 Maidand, Fl 32751

wayer suffice com

Alleg address:

May 20, 2003

Pord Motor Co Consumers Affairs P.o.box 6248 Md- 3nc-b Dearborn, MI 48126

Insured Name: Policy Number: Loss Date:

Claim Number:

May 11, 2003 801623702007 SECTION
SECTION
3 NN 21 AU:

To Whom It May Concern:

Our policyholder has submitted a claim for damage to their property. On May 11, 2003 the insured was at his residence when his 1997 Ford F 150 caught fire. The insured towed the vehicle to the Lakeland Ford Auto Mall for repairs. We sent a fire specialist and it was determined that the cause of the fire was electrical. It appears that the fire started on the cruise control switch. The fire humed all the wiring, tires and brakes and damaged the engine.

We have investigated the claim and concluded that you might be responsible for the loss.

Under the provisions of our policy, we have a right to our insured's right of recovery to the extentof our payment.

We need for your company to send an electrical engineer to evaluate the damages. The vehicle is at the Lakeland Ford Auto Mall dealer. We have not done any repairs to the vehicle until your electrical engineer evaluates the vehicle. We also need for your engineer to contact us prior to initiating any work. We are sending our own electrical engineer as well.

We appreciate your cooperation and look forward to hearing from you or your insurance carrier. If you have any questions regarding this claim, please contact us at the number below.

- 5/11/03 - 17 F. 150

CATTRIEF 481

BA aglanted traderate of BAFECO Corporation

Page 2 Bustor Or Sabra Wise May 20, 2003

Sincerely,

Glanda Rosado

Maitland

First National Insurance Company of America

(800) 332-3226

Ext; 227274

Fax: (407) 875-7851

(800) 332-3226 gleros@safeco.com



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Premier Claims Investigations, Inc.

Thousan Pranton Sandor Fire Investig 5497 Total Namery Bd. Course, Terras 77304

Telephone (936) 321-4989 Fax (936) 441-4990-5-Mail: Literatum@att.ect

Ms. Shawn Norton Ford Motor Company 3 Parklane Blvd., Suite PTW 300 Dearborn, MI 48126

RECEIVE " 3 2003

Telephone: (313) 322-3269 (313) 845-4089

Re: Fire Loss in Dwelling / 1998 Ford Expedition

Loss Location:

Date of Loss: May 25, 2003 State Farm Insurance Claim #:

This letter is notification that a 1998 Ford Expedition was involved in a fire loss. Electrical components within the vehicle may or may not have caused this loss. This letter is also intended to inform interested parties that a joint examination of the vehicle and dwelling will be conducted within the next fourteen days.

The dwelling and vehicle are insured by State Farm Insurance Company. The contact person at State Farm Insurance Company is Mr. O. J. Miller and be may be reached at 281-486-3600. Please contact me at 281-732-1815 in order that a date and time can be arranged for a joint examination of the dwelling and vehicle.

Respectfully.submitted,

Tom Frankum, CFEI - NAFI Premier Claims Investigations, Inc.

VERITÉ FORENSIC ENGINEERING, LLC.

PROTOCOL FOR EXAMINATION OF SPEED CONTROL DEACTIVATION SWITCH (BRAKE PRESSURE SWITCH)

GENERAL

All parties will be allowed to visually examine the switch assemblies prior to beginning the examination. Thereafter, all detailed photographic analysis and documentation will be performed by the laboratory. Any party will be able to request special photographic documentation as they deem necessary, which will then be performed by the laboratory and included in the documentation. All parties will be provided with documentation (including photographs, SEM prints and EDAX reports, etc.) after exquests have been made through counsel and arrangements for payment have been made.

SWITCH BODY

j

If the switch body and stationary and moveable contacts are available, the following procedures are to be followed:

- 1. X-ray the switch body from at least three orientations.
- Break or cut away the thermoset plastic body to extract metallic components, taking care not to remove any deposits that are present on these metallic components.
- 3. Perform digital stereoscopy on the released metal parts.
- Place metal components in the scanning electron union scope (SEM) for examination.
- Perform energy-dispersive x-ray analysis (EDAX) of any and all surface deposits on these metal parts.
- Using a mutually acceptable technique, clean deposits from the metal parts.
 Start with the least aggressive technique and continue until the parts are clean to a degree mutually acceptable.
- Place metal parts of switch back in SEM for examination and, if necessary, further EDAX work.

1036 A Pirat Street + Houghie, TX 77334 + Tokephone 281-548-3561 + Fan 281-548-3562 Melling Address: F.O. Box 909 Houghie, Texas 77347

HEXPORT BODY

- Examine exterior surface of cup in the stereoscopic and scanning electron microscopes without cleaning.
- Characterize surface deposits on the cup exterior surface using EDAX.
- Cut the crimp ring so as to remove the cup. This cut will consist of an axial cut through the wall of the crimp ring.
- After removing crimp ring, the internal parts of the hexport will be laid out in their correct sequence and digitally photographed on all surfaces.
- Clean the exterior surface of our using the methodology cutlined under "6." above and replace into SEM for examination and EDAX work.
- The Kapton seals will be provided with a small stick-on tag in order to label their position inside the hexport body.
- The Kapton seals will be examined in the stereographic and electron microscopes.
- 15. The surfaces of the converter, washer, spacer and disk will be subjected, at areas of mutual accord, to:
 - a. EDAX
 - b. Fourier transform infra-red analysis (FTIR)
- 16. Depending upon the data generated in the above procedures, it may be necessary to perform other metallargical examination, such as metallography. This will be performed on a basis of natural agreement.

By signing this protocol, all parties understand the above procedures will be destructive in nature and once completed, the components cannot be reassembled or reconstructed into their original form.

Printed Name	Signature	Representing	Date
		-	
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RECEIVED JUL 2 9 2004

2004

FORD MOTOR COMPANY HEGENED

JUL 2 9 2004

OFFICE OF THE GENERAL COUNSE



National Execution Center P.C. Box 268992 Oklahoma City, OK 73126-8992 claimedocument@faranasiusurance.com Pax: 877 217 1389

07/29/2004

Ford Motor/Shawn Norton Parklane Towars W/See 300/3parklane Blvd Dearbonse, MI 48126

Res

Our Inspects

Ow Claim # :

Date of Lease

05/17/2004

Your Claim#:

Amount Oweds

\$13,137.88

Dear Ford Monor/Shawn Norton:

We have made payment to our insured for damages resulting from this accident. Our investigation has established that the above loss was caused by a manufacturer's defect. By virtue of our subrogation rights this letter is to advise you that we expect payment from you for the amount of damages within 14 days of the receipt of this letter.

Be advised that no partial payment, which is less than the full amount chimed herein, will be considered in any way an emephatic of henefits, a novation of an accord and satisfaction of this chim without the express written release of our chim executed by an individual who identifies himself/henself as a member of our subregation department. Therefore, our legal rights to enforce collection on the remaining amount of the claim shall not be waived or estopped due to a partial payment by year.

If you need additional support for our claim or require further information, please call one at 512-238-5715 with your FAX number so that the requested information can be sent to you.

Sincerely,

Mid-Century Insurance Company of Texas

Revis Kostrous Manager

ATTACHMENT(S)

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2/11/04 86 10/2/2000

JUL 29 2284 29:38

PAGE. 01

Advanced Investigative Concepts Fire and Explosion Scene Analysis

Fire Investigation Report

Vehicle Fire

File Number: AIC-1290704-FAR

Prepared For:

Mid Century insurance Company of Texas

Claim Number

insured:

Loss Description:

1998 Ford F15 VIN: 1FTRX17LXW

Attention:

Ms. Psyche N. Steele ADP Claims Representative Farmers Insurance Company 2505 Hwy. 360 North, Suite 500 Grand Prairie, Texas 75050

July 28, 2004

David Mark Howell, C.F.L/C.F.E.L. AiC Director / Senior Fire Consultant

Advanced Investigative Concepts
One Fox Hollow Run

Telaphone/Fest (940) 321-1702 (800) 215-1955 PIN 805 Denton, Texas 76208

E-mail: DMarkHowell@netecups.act

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Section I

Introduction

Ms. Psyche Steele, ADP Claims Representative, representing Mid Century insurance Company of Texas, retained Advanced Investigative Concepts (AIC-Fire) on July 23, 2004 to determine the origin and cause of a vehicle fire loss that occurred on May 17, 2004.

The location of the 1998 Ford F150, when examined, was the Don Davis Auto Body facility located at 2111 West Division in Arlington, Texas.

AlC-Fire Senior Fire Consultant David Mark Howell, C.F.L / C.F.E.I., conducted the vehicle examination on July 23, 2004.

Opinions and conclusions contained in this report are based on information available at the time of the investigation. In the future, if any other information, which could in any way impact or affect the conclusion contained herein becomes available; we will revise and amend our determination as deemed appropriate.

This report was prepared for the exclusive use of Mid Century Insurance Company and is not intended for any other purpose.

Section II

Origin and Cause

The fire originated in the engine compartment of the vehicle. The point of origin, of the fire, was located at the master brake cylinder on the driver's side of the engine compartment. The cause of the fire was a fault in the wiring to the cruise control deactivation switch which in turn ignited the combustible components of the brake master cylinder.

EXPERT PAT

Section III

Fire Analysis

On July 23, 2004, this fire consultant examined the fire-damaged vehicle of the insured. The 1998 Ford F150 was located at the Don Davis Auto Body facility at 2111 West Division in Arlington, Texas when inspected. The vehicle was damaged by fire on Monday, May 17, 2004.

Vehicle Analysis:

Examination, of the vehicle, was begun on the exterior (front) and continued clockwise systematically. The vehicle was examined on the interior from the least burned areas to the point of origin. Digital photography was used to document the damaged vehicle.

The combustible components of the grill and headlight assemblies located on the front end of the 1998 Ford F-150 were undamaged by the fire. The front bumper and plastic bumper covers were also found intact and undamaged by the fire. Texas license plate was attached to the front of the vehicle. The hood and windshield sustained light fire damage on the driver's side of the vehicle. The area of origin for the engine compartment fire was on the driver's side near the firewall. The rear of the hood, closest to the firewall, and the area of the windshield, located directly above it, sustained a coating of soot and smoke stains to the exterior surfaces. The windshield was broken near the area of origin, but had not been breached by the fire. The fire did not enter the passenger compartment of the vehicle. The hood, of the vehicle, exhibited a radial bum pattern, that was approximately one and one-half feet wide, that radiated forward, about nine inches, toward the front of the vehicle (Photographs 1 and 2).

The passenger's side, of the vehicle, was undamaged by the fire. There appeared to be no prior collision damage to the passenger's side of the vehicle. Both wheels

and thes were a matching set. The window in the passenger's door appeared to have been down at the time of the fire (<u>Photograph 3</u>).

The rear, of the vehicle, was also undamaged by the fire. There appeared to be no prior collision damage. Texas ficense plate **exercises** was affixed to the rear bumper (<u>Photograph 4</u>).

The driver's side, of the vehicle, sustained fire damage to the front fender. There appeared to be no prior collision damage. Both wheels and tires were matching that were the same as found on the opposite side. The fire damage on the front fender was located directly above the front wheel and tire. The fender had been exposed to the high temperatures of the engine compartment fire. The paint was blistered and there was a light accumulation of soot achieved to the surfaces around the burn pattern found on the fender (Photograph 6).

The front passenger compartment, on the passenger's side of the vehicle, was undamaged by the fire. The interior surfaces, of the passenger compartment, were free of any soot accumulation. As aforementioned, the window, located on the passenger's side of the vehicle, appeared to have been down at the time of the fire (Photograph 7).

The rear passenger compartment, on the passenger's side, was also undamaged by the fire (<u>Photograph 8</u>). The rear passenger compartment, on the driver's side, was found in the same condition as the front. The rear window glass was intact and undamaged by the fire (<u>Photograph 9</u>).

The front passenger's compartment, on the driver's side, was also found undamaged. All components located in the driver's front area, of the passenger compartment, were intact and undamaged by the engine compartment fire (Photograph 10).

The fuse box, located in the front passenger compartment on the front of the dash, was inspected and fuse number fourteen which was a fifteen amp fuse was found to be blown (Photograph 11).

The underside of the hood had fire damage to the driver's side. The hood, in the area of origin, had a heavy accumulation of soot adhered to the painted surfaces of the underside (Photograph 12).

The engine compartment of the vehicle sustained moderate fire damage. The heaviest of this damage was located on the driver's side of the engine compartment (Photograph 13).

The passenger's side, of the engine compartment, was inspected. This area, of the engine compartment, had housed the battery of the vehicle. The components located on the passenger's side, of the engine compartment, were undamaged by the fire. Close inspection of the battery and both positive and negative cables indicated there was no evidence of an electrical fault or fire damage (<u>Photographs</u> 14 and 15).

The electrical distribution box which was located on the driver's side of the engine compartment was inspected. No fuses were found to be blown; however the exterior and portions of the interior, of the box, were damaged from exposure to the fire located in the driver's side of the engine compertment (<u>Photograph 16</u>).

As aforementioned, the heaviest of the fire damage was located on the driver's side of the engine compartment. The area directly above the brake master cylinder sustained the heaviest fire damage with some areas of the firewall displaying heavy oxidation and one area of clean burn. The fluid reservoir located on the brake master cylinder had been destroyed there was heavy damage to the plastic components surrounding the brake master cylinder (<u>Photograph 17</u>). The cruise control descrivation switch, located at the very front of the brake master cylinder, was partially intact, but heavily damaged by the fire (<u>Photograph 18</u>).

The witting was examined and found to have a fault located in the electrical connector which had been attached to the cruise control deactivation switch (Photograph 19).

The other end of the faulted connector was found in the partially consumed plastic portion of the cruise control deactivation switch, which was located in the top of the brake master cylinder, and was determined to be the cause of the engine compeniment fire (<u>Photograph 20</u>).

Conclusion:

in conclusion, based on the vehicle fire examination, this fire consultant has determined the fire originated in the engine compartment of the vehicle. The point of origin of the fire was located at the master brake cylinder on the driver's side of the engine compartment. The cause, of the fire, was a fault in the wiring to the cruise control deactivation switch which in turn ignited the combustible components of the brake master cylinder.

Section IV

Overview

- 1. The fire-damaged vehicle was analyzed and photographed.
- The pertinent data was compiled and evaluated. This fire report was written after all available information was received and a determination of the origin and cause of the fire was made.

Section V Attachments

Section V Attachment A Photographs

Photography Log

Photograph 1: Front of the 1998 Ford F150

Photograph 2: Hood and windshield of the vehicle

Photograph 3: Passenger's side of the vehicle

Photograph 4: Rear of the vehicle

Photograph 5: Driver's side of the vehicle

Photograph 6: Driver's side of the vehicle; front fender

Photograph 7: Front passenger compartment; passenger's side

Photograph 5: Rear passenger compartment; passenger's side

Photograph 9: Rear passenger compartment; driver's side

Photograph 10: Front passenger compartment; driver's side

Photograph 11: Fuse box located in dash of vehicle

Photograph 12: Underside of the hood

Photograph 13: Engine compartment of the vehicle

Photograph 14: Passenger's side of engine compartment

Photograph 15: Battery located on passenger's side of engine compartment.

Photograph 16: Electrical distribution box; driver's side of engine compartment.

Photograph 17: Area of origin, brake master cylinder

Photograph 18: Brake master cylinder

Photograph 19: Wiring for cruise control deactivation switch

Photograph 20: Cruise control deactivation switch in brake master cylinder

Section V

Attachment B

Fire Consultant Curriculum Vitee

Mark Howell, C.F.I., Senior Fire Consultant Curriculum Vitae and Training

David "Mark" Howell is Director and Senior Fire Consultant of Advanced Investigative Concepts, Inc.; a Texas licensed private investigation company specializing in fire origin and cause investigations. Mark has over twenty-sight years experience in the fire service and has served as a Firefighter/Paramedic and the Fire/Areon Investigator for the Carroliton, Texas Fire Department. In 2000, after serving eight-years as the Fire & Arson Investigator for the City of Carroliton, Texas, he was appointed Special Deputy United States Mershal and assigned to the United States Treasury, Bureau of Alcohol, Tobacco and Firearms, Delias Group II Bornb and Arson Tests Force. Mark refired in 2002 from the municipal fire service and the ATF task force.

Mark holds both the Certified Fire Investigator (CFI) certificate from the International Association of Arson Investigators and the Certified Fire and Explosives Investigator (CFEI) certificate from the National Association of Fire Investigators. With Carrollton, he was a State of Texas certified Advanced Firefighter, Advanced Arson Investigator, Intermediate Instructor, Peace Officer and Fire Inspector. He is Owner/Director of Advanced Concepts in Training, a seminar production company specializing in fire related topics and has coordinated numerous workshops and seminars in North Texas. Mark has investigated over 1000 fires and has testified as an expert witness in state and federal criminal erson related trials. Also, he has given several civil depositions referencing fire investigations and has testified as an expert witness in civil court.

Mark is past-president of the North Texas Fire Investigators' Association (NTFIA) and has served several years as NTFIA Secretary/Tressurer. He is a current Olivector of A Texas Advisory Council on Arson (ATAC). Besides his affiliation with NTFIA and ATAC, Mark holds memberships in the international Association of Arson Investigators (IAAI) and the Texas Chapter of IAAI, the National Association of Fire Investigators, and until retirement, the North Texas Chapter of International Association of Special Investigative Units, the Texas Police Association, and the international Association of Firefighters.

Mark's accolates include being nominated in 1990 by A.T.F. Dalies Group it supervisors as the National Association of Police Organization's national award of "Top Cop" and, he has twice been presented the Excellence in Service award and once the Cerroliton Ambassador award by the City of Cerroliton elong with numerous commendations.

Mark Howell, C.F.J., Senior Fire Consultant

Training:

1974 to 2002, Carrollton Texas Fire Department; Firefighter

1988 to 2000, Emergency Medical Education; Director/Instructor

1994 to 2002, Advanced Concepts in Training: Director/instructor

1990, Emergency Resource; Surviving the Hazardous Materials Incident

1991, Texas Engineering Extension Service; Methods of Teaching

1991, National Fire Academy; Hazardous Material Responder

1991, Texas Commission on Fire Protection Personnel Standards and Education; Intermediate Instructor

1993, Appointed Fire & Arson Investigator for the City of Carrollton, Texas

Police Academy: 1993, North Central Texas Council of Governments Regional Police

Academy; Basic Course in Applied Police Science - Peace Officer

1993, Texas Engineering Extension Service, The Texas A&M University System

Criminal Justice Academy, Standardized Field Sobriety Teeting

1993, National Academy for Professional Driving, Tactical Police Oriving

1993, Public Agency Training Council; Kinesic Interview and Interrogation Techniques
Arson / Fire Investigation Academy: 1993, Dalias County Fire Academy; Fire & Arson
Investigation (Fire and Arson Investigator Certification Course)

1993, Texas Commission on Fire Protection Personnel Standards and Education; Investigator

1993, Carrollton Police Department; Crime Scene Search

1993, Texas Engineering Extension Service, The Texas A&M University System Fire Protection Training Division; Ignition To Trial

1993, National Fire Academy; Instructional Techniques for Company Officers

1994, Carrollton Fire Department: Crime Scene / Arson Investigation Photography

1994, International Association of Arson Investigators; Fire Investigation Theory Applied to Live Sums

1994, Texas Engineering Extension Service, The Texas A&M University System Fire Protection Training Division; 39th Annual Texas Fire and Arson Investigators Seminar 1994, Department of the Tressury, Bureau of Alcohol, Tobacco and Firearms National

Academy, Glynco, GA.; Advanced Arson for Profit Course 1994, Federal Bureau of Investigation's Law Enforcement Officers Training School;

Photography |

1994, Cellular Telecommunications Industry Association, Washington, D.C.; Cellular Fraud Awareness and Prevention Training

1994, Public Agency Training Council; Advanced Kinesic Interview Interrogation Techniques

1994, International Fire Code Institute; Uniform Fire Code Update

1995, North Texas Fire investigators' Association, Secretary

1995, Taxas Engineering Extension Service, The Taxas A&M University System; 40th Annual Texas Fire and Araon Investigators Seminar

1985, International Training Association; Advanced Cause and Origin\Expert Witness

1995, National Association of Fire Investigators; Determining the Cause and Origin of Fires and Explosions Training Seminar, Chicago, IL.

1995, Lewisville Fire Department; Ordnance / Explosive Recognition

1995, International Association of Arson Investigators; Juvanille Firesetting Intervention

1996, North Texas Fire Investigators' Association, 2rd Vice-President

1996, Texas Commission on Fire Protection Personnel Standards and Education; Fire and Arson Investigator Intermediate

1996 to 2002, Texas Commission on Fire Protection Personnel Standards and Education; Fire and Arson Investigator Advanced

1996, Institute of Criminal Justice Studies; Juvenile Law for Street Officers 1996, International Training Association; Practical Bomb and Explosive Device Investigations

1997, North Texas Fire Investigators' Association, 1st Vice-President

1997, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Arson Investigators Seminar

1997, North Central Texas Council of Governments Regional Police Academy, Cultural Diversity

1997 to 2001, Texas Commission on Fire Protection Personnel Standards and Education; Fire Inspector

1997, North Central Texas Council of Governments Regional Police Academy; Special Investigative Topics

1997, International Association of Special Investigation Units; I.A.S.I.U. Seminar 1997, North Texas Fire Investigators' Associations; Advanced Concepts in Fire Investigations

1997, Massachusetts State-Wide Coalition for Juvenile Firesetter Intervention Programs; Massachusetts Juvenile Firesetter Intervention Program

1997, Office of the Governor, Writing to Win

1998, North Texas Fire Investigators' Association, President

1998, Collin County Criminal District Alterney's Office; Texas Homicide Symposium 1998, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Arson Investigators Seminar 1998, U.S. Department of Justice, F.B.I.; Interviewing & Interrogation Techniques 1998, The Texas A&M University System; Determination: Arson, How to investigate the Crime

1998, North Texas Fire Investigators' Association; A Basic Fire Investigation 1999, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Arson Investigators Seminar 1999, A Texas Advisory Council on Arson; Explosive Recognition & Interviewing Techniques

1999, State of Texas, Office of the State Fire Marshel; Juvenile Firesetter Intervention Program

1999, North Texas Fire Investigators' Association; Analytical Interviewing Techniques 2000, North Texas Fire Investigators' Association, Secretary/Trescurer 2000 to 2002, United States Treasury, Bureau of Alcohol, Tobecco and Firearms, Dalles Group II Bomb and Arson Task Force; Investigator

2000, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Arson Investigators Seminar

2000, Texas Chapters of IASIU; Here and Beyond 2000

2000, North Texas Fire Investigators' Association; NFPA 921 Series. Basic Methodology, Recording the Scene, & Explosions 2000 to 2002. United States Department of Justice, United States Marshal's Service; Special Deputy United States Marshal. 2000 to present. Texas Commission on Private Security, Investigation Company Owner (Advanced Investigative Concepts, Lic. # A10850) 2000 to present, Texas Commission on Private Security; Owner/Manager, Ltc. #9424 2001. North Texas Fire Investigators' Association, Secretary/Treasurer 2001 to present, National Association of Fire Investigators; Certified Fire and Explosion investigator 2001, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Arson Investigators Seminar 2001. The North Texas Fire Investigators' Association; NFPA 921 Series, Fire Patterns, Legal Considerations, & Investigation of Motor Vehicle Fires 2001, United States Treesury, Bureau of Alcohol, Tobacco and Firearms; Advanced Explosives investigative Techniques course 2001. The North Texas Fire Investigators' Association; NFPA 921 Series, Electricity & Fire, and Appliance Failures 2001, International Association Bomb Technicians and Investigators: Advanced kuprovised Expinelve Davices and Terrorist Activities Regional Training Conference 2002, Instructor, North Texas Chapter International Association of Special Investigative Units: Fraud Focus 2002, Fetality Fire investigations 2002, The Texas A&M University System, Texas Engineering Extension Service Fire Protection Training Division; Texas Fire and Areon Investigators Seminar 2002 to present, International Association of Arson Investigators; Certified Fire Investigator 2002, Instructor, State Farm University, Fire Related Appliance Fallures 2002, A Texas Advisory Council on Arson (ATAC), Director 2002, Instructor, Metropolitan Home and Auto, Fire Investigations 2002, Instructor, State Farm Insurance Company, Burn Pattern Recognition 2002, A Texas Advisory Council on Amon, Trial Preparation 2002, 19th Annual East Texas Arson Investigators' Seminar, Electrical Fire investigation 2003, Instructor, NICB & State Ferm Insurance, 8th Annual Conference 2003, Instructor, Nationwide Insurance Company, Fire and Explosion Investigations 2003, Instructor, State Farm Insurance Company, Fire Scene Investigations 2003, Instructor, Republic Insurance Company, Fire and Death Investigations 2004. Instructor, North Texas Chapter International Association of Special Investigative

Note: Bold denotes major schools, certifications, licenses, or appointments

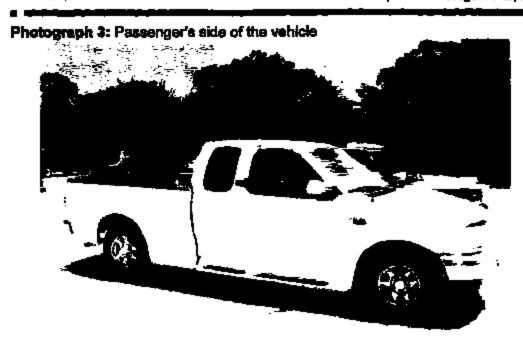
Units Fraud Seminar, Structure and Vehicle Fire Investigations

Photograph 1: Front of the 1998 Ford F150

Photograph 2: Hood and windshield of the vehicle



Principle papers

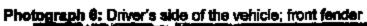


Photograph 4: Rear of the vehicle



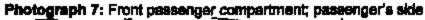
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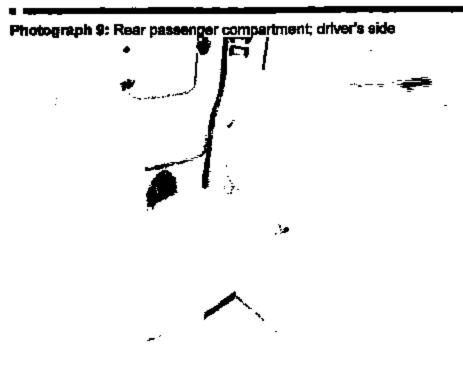




Photograph 8: Rear passenger compartment; passenger's elde





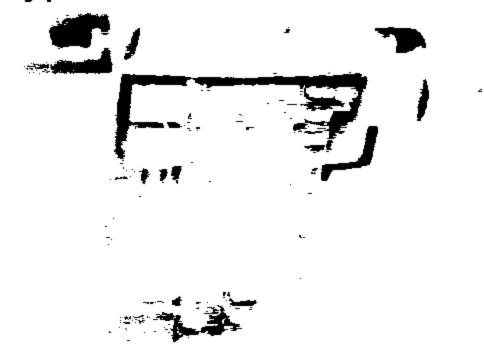






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Photograph 11: Fuse box located in dash of vehicle



Photograph 12: Underside of the hood



Photograph 13: Engine compartment of the vehicle



Photograph 14: Passenger's side of engine compartment



Photograph 15: Battery located on passanger's side of engine compartment



Photograph 16: Electrical distribution box; driver's side of engine compartment



Photograph 17: Area of origin, brake master cylinder







Photograph 19: Wiring for cruise control deactivation switch



Photograph 20: Cruise control deactivation switch in brake master cylinder





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State Farm Insurance Companies



June 5, 2002

Ford Motor Company Office of General Council Parkiene Tower West, Suite 400 3 Parkiane Blvd. Dearborn, MI 48126 FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
JUN 1 1 2002
OFFICE OF THE
GENERAL COUNSEL

State Form Insurance Claim Office 6606 Water Rd. Sec 279360 Corpus Christi, Tesse 78427-0580 Phone: 650-8000

ATEN: Product Claims

RE: Claim Number: Our Instanct: Date of Loss: Vehicles

May 8, 2002 1997 Ford 7450 VID: 4FTDX1788/46

RE: Claim Number:

Our insured:

Date of Lose: Vehicle; April 29, 2002 1997 Ford F150

VIN: 1FTDX17W8VI

The identified 1997 Ford F150's are injured by State Farm insurance Company. These unoccupied vehicles experienced engine compariment fires with similar form patients.

State Farm would like to give you an opportunity to inspect these vahicles and give you advance notice of our potential subrogetion claims. Please contact me at 361/850-8037 to set up a time for your inspection.

Sincerety,

Danis Dempesy

Senior Claims Representative
State Farm Mutuel Automobile Insurance Company

dd/sav

-1978-150 4/29/02

CONFIDENTIAL VEHICLE FIRE EVALUATION

RE:

1997 Ford F-150 XLT "Sport"

License:

V.LN.: 1FTDX17W8VH

Clalm #:

DOL: 04/29/02

VEHICLE LOCATION:

Insurance Auto Auction

4410 Agnes

Corpus Christi, Texas Stock: #2001581

TO: Mr. Darren Dempsey

Claims Representative

State Farm Insurance Company

6606 Weber Road

Corpus Christi, Texas 78413

361/850-6037

Fax: 361/851-6525

FROM: INTROSPECT

License #: C-1000 1023-C 3rd Street

League City, Texas 77573

(281) 332-0613

Facsimile: (281) 332-0842

DATE: June 20, 2002

INTRODUCTION

May 20, 2002, Monday Transport 1, was contacted by Mr. Darren Dempsey of State Farm Insurance Company, requesting a Fire Origin and Cause Evaluation of the above captioned loss.

DETAILS

May 23, 2002, Thursday, approximately 0800 hours, arrived at the vehicle storage location.

Approximately 1300 hours the vehicle fire evaluation was completed for the day.

VEHICLE SUMMARY

The insured vehicle is a 1997, two [2] door, red in color, pick-up truck type of vehicle. The vehicle is equipped with an eight [8] cylinder, fuel injected engine. The license number is Texas The Vehicle Identification Number [V.I.N.] is 1FTDX1769VM467846.

The vehicle is presently being stored/located at Insurance Auto Auction, 4410 Agnes Street, Corpus Christi, Texas, stock # 2001584.

VEHICLE DESCRIPTION: All vehicle identification and information are observed on the vehicle. License plates, V.I.N. plate remain on the vehicle. There are no visible signs or evidence of forced entry into the vehicle. All tires rims, lugs and rims remain on the vehicle.

TRUCK BED: The truck bed is lined with a truck bed liner. The gas cap and filler neck remain in position and undamaged by the fire. No other contents are observed in the bed of the truck.

EXTERIOR: There is slight body damage on the rear quarter panel, passenger's side of the vehicle. The glass in the door frames are broken out. The remaining glass shards are observed crazed and broken. The widow tray and track indicate the windows were in the "closed" position at the time of the fire. The doors appeared to be unlocked at the time of the fire. The windshield glass on the driver's side is broken and melted. The section of sheet metal of the hood on the driver's side is melted and consumed. The sheet metal on the roof is not melted. The grill and headlight assemblies are intact and in position. All thes are in position. The tire brand name is Firestone,

model "Fire Hawk", size, LT 265/75R16 M/S. There is moderate tire wear.

ENGINE COMPARTMENT: The vehicle is equipped with a 4.6 liter, eight [8] cylinder, fuel injection engine. The engine compartment is heavily damaged by the fire. The fuel injection system remains in position and damaged the external, distal heat. The battery remains in position with no evidence or arcing, shorting or faults at the terminals. The top portion on the driver's side radiator is melted. Sections of the fan belt remain in position. There is no evidence of frictional heating at the pulleys. The alternator, air condition clutch and tension pulleys do not appear frozen. The power steering fluid reservoir appears empty. The oil dipstick is consumed by the fire. The oil filler cap remains in position. The spark plug wires and spark plugs are in position. The fuel rails and fuel injectors appear in position. The front throttle body housing sustained the most heat damage. The distributors appear in position and do not appear cracked or traumatized. The motor mounts appear in good condition.

PASSENGER COMPARTMENT: The instrument panel is fire damaged on the driver's side of the vehicle. The panel appears melted and partially consumed on this section of the panel. The vehicle mileage is 45416. The glove compartment appears unlocked and contains no personal contents. All interior door panels are in position. The interior carpeting is unburned and only sustained smoke damage. The door handles and hardware are in position. All interior components are in the vehicle. The interior seats are covered with cloth material. The steering column and ignition switch do not appear tampered. Inspection of the interior fuse panel reveals nothing remarkable.

VEHICLE UNDERSIDE: The fuel tank appears in position and intact. The fuel lines, filter and underside fuel tank assembly appear intact and undamaged by the fire. The U-joints and drive shaft appear functional at the time of the fire. There are no signs of fluids leaking under the vehicle. There is no evidence of fire under the vehicle.

CASUALTIES

None reported,

INSURANCE

Type of Policy: Claim Number: Personal Automobile

EVIDENCE

May 23, 2000, Thursday, a series of color photographs (DIAS)were taken by B. Calderon.

<<<>>>

May 23, 2000, Thursday, a color videotape reproduction of the scene was taken by $\beta_{\rm s}$ Calderon.

<<<>>>

ORIGIN AND CAUSE

AREA OF FIRE ORIGIN: The fire originated in the engine compartment of the vehicle. Examination and interpretation of visible burn patterns indicate the fire origin.

FIRE CAUSE: The cause of the fire is "Accidental-part failure, maifunction". The fire originated in the area of the engines' brake deactivation switch. Examination of all available heat sources were examined and eliminated. Refer to electrical engineers report for further data regarding failure mode.

IGNITION SEQUENCE:

Equipment Involved in Ignition: Road transport equipment [1997 Ford F-150]

Form of Heat of Ignition: Heat from electrical distribution equipment

Source of Heat of Ignition: Engine part/component

Ignition Factor: Accidental-part failure/malfunction.

Material Identification:

Form: Engine part/component

Type: Rigid and pliable plastic material

Fire Spread: Fire damage is contained to the engine compartment.

Materials: Combustible engine components and materials along with indigenous ignitable liquids served as fuel to spread the fire.

Avenues: Fire travel is allowed through existing openings in vehicle design.

Smoke Spread: Smoke damage is observed through out the engine compartment and through other areas of the vehicle.

Materials: Combustible engine components and materials along with indigenous ignitable liquids served as fuel to spread smoke damage.

Avenues: Smoke damage is allowed through existing openings in vehicle design and through openings created by the high heat release rates.

All other accidental, natural, and incendiary fire causes have been eliminated.

A fire canine team was utilized to examine the vehicle interior compartment. The canine did not alert for residual vapors of ignitable liquids.

No fire debris was submitted for forensic evaluation.

The authority having jurisdiction has determined the fire to be "Accidental".

METHODOLOGY

The compliation and analysis of the factual data evaluated in this fire loss has been based on the Scientific Method as prescribed in *The National Fire Protection Association (NFPA) National Fire Codes*—NFPA #921 - *Guide for Fire and Explosion Investigation.* The professional level of performance required for fire investigators has been adhered to as per *NFPA #1033 - Standard for Professional Qualifications for Fire Investigator.* Additional literature referenced for methodology includes publications of the American Society of Testing Materials, National Fire Protection Association, Curriculums of the National Fire Academy, and Texas Commission on Fire Protection.

This investigation by Introspect is based upon a systematic approach recognized by the relevant scientific fire community. Introspects' methodology and technique has been subjected to pear review.

Fire scene reconstruction has been performed. [NFPA Handbook] Testing to support methodology and technique utilized has been established by the literature of the NFPA. The goal of the {NFPA 921} Committee is to "provide guidance to investigators that is based on accepted scientific principles or scientific research". The material within NFPA 921 and NFPA 1033 is prepared for general use and not directed to any particular judicial action pending. This literature is objective and based on scientific principals, technology, and methodology.

The formation of the above captioned conclusions are based upon the existence, maintenance and utilization of relevant NFPA and ASTM codes, standards, guidelines, or recommended practices when possible. This literature has widespread acceptance in the scientific community.

The hypotheses presented within have withstood all appropriate challenges while all reasonable alternatives to the hypotheses have been considered and climinated due to their failure to withstand a valid challenge.

The level of confidence for this evaluation is "Conclusive".

OWNER - OPERATOR

OWNER/OPERATOR #01:

Name: Address: City: Phone:



DOB:

FIRE OFFICIALS

Alice Fire Department

Alice, Texas

JURISDICTIONAL AUTHORITIES

Alice Police Department

Officer: M. Hastings #448

Station: LAREDO LED SA. J SECC Preliminary Surface Airways (SA) Observations

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5à	02 WX:	4 25	3	77	57	60	130 11 CLOUDE:	PM1De	-	30.0	0.00		08:46
	Q2,	4 29	4	77	57	50	140 11 CLOUDS:	ŻEMOGO	•	10.0	0-00		99:46
βλ	22 02 11;	129 129 1444 15444	5	77	59	54	130 10 CLOUDS:	16 0¥0030	•	10.0.	0.09		10146
51	WI:	4 29	•	75	63	66	130 15 CLOUD4:	ÓVC018	•	5.0	0.40		11:46
sk	02 02 12:	4 29	7	75	64	49	130 15 CLCCOS:	ÖVC015	•	5.0	6.40		12:46
		A 29	•	77	63	62	130 15	ikw 015		5.0	8.00		13:46
SA	•2	4 29	,	61	63	54	140 15 CLOSES	ř EW 020	•	6.0	0.00		14:46
Sk	12:	AH.,	10	84	64	51	150 13 CLOSDE:	•		6.0	0.00		15:46
	ij.	4 29 RE		86	43	43	160 10 CLOUDS:	ŠEC		6.0	0.60		16146
	7.5			91	64	41	140 10 CLOUDS;	ÎRC		4.0	0.40		17:46
81	102.1	1 29 12 12 1 29	13	95	4	36	150 10 CLOUDS:			1.0	0.00		10:51
М	## ## ## ## ## ## ## ## ## ## ## ## ##	1 29	14				CLOUDS						
Bλ	. 5	4 29	15	100	57	24	120 12 CLOUDS:	erce.		₽.0	0.00		20:50
	· \$2	4 19		100	87	24	120 16 CLOUDS	itec		0-0	0-00		21:46
82	. 躁	4 25	17	102	54	20	130 18 CLOUDS			1.0	0.00		22:49
81	ᇤ	4 24	16	102	54	30	120 17 CLOUDS :	. SEC	•	4.0	0.00	104 61	23:48
27	WE:	4 39	is 19	FY 99	\$5	28	100 6 CLOUDS:	24 EEC		4.0	0.00		00:44
63	02 112	4 29	20	95	55	26	120 17 CLOUDS	22 580		1.0	0.40		01146
AL	. 62	4 29		91	54	29	150 15 CLCUDE:	34 800	٠	4.0	9.00		02:46
SI.	. 62	CARTO:	22	48	\$2	19	130 16 CLCUBS		•	8.0	0.00		03:46
33	D2	4 29	23	14	55	37	150 15 CLOUDS	inc		8.0	0.00		94:46
		GRES: 4 25 GRES:		81	94	39	140 16 CLOUDS	inc	٠	10.0	0.00		·05146
		4 29		•••	••••		13,5				0.00	104 75	

SOUTHERN REGIONAL CLÍMATE CENTER

Louisiana State University Baton Rouge, LA 70803-4105

Tel: (225) 578-5021 Fax: (225) 578-2912



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Douglas Holgnes, AA, BS, MPA, CFEI, CFII

Master Fire Investigator

INTROSPECT

Texas License # C-4800

~-1-	Number
1.00	NIBSTAT

	AFFIDAVIT OF VEHICLE FIRE (ALC	apertions Must Be Complited in Iniq
۱.	- Nama of Insure	Name of Owner
	Address	Hame Phon
	Date of Birt Markal Status: Warried	d Single No. of Dependents 4
	(Outlored)	Orfver's License N
	Occupation Trayer/EugensonAn	
	Employeds Name	
	Addres	Pho
2.	. Date of Fire <u> </u>	<u>55 </u>
	Make of Vehicle Fonce Year 7 Model F - 10	Color CANTE
	Vehicle ID # FFDY 13-WSYK	State 7X
	Certificate of Title # if	none, why?
	Number of cylinders 8 H.P or C.1. or Liter	5 - O Odometer reading 97,86
	Was vehicle locked? Yes No Were window	
	When did you last see your vehicle? Date	Time 🔲 A.M. 🔲 P.M.
	Specific location where vehicle burned $\underline{Druc_{H}r_{E}\alpha}$	(& Carron Doan
	Reason vehicle was left at this location The To	TE STORY WHERE WORK IS DURING
	Name and address of person who left auto at this tocation 45	alexand rote along Homes
	Their d	friver's Scense name
	When was the fire discovered? Date 4-29-0-	<u>~ Time </u>
	Who made the discovery? LUIS PEREZ LARCIA	407-7407
	When was fire reported to fire department? Date	<u>^-02</u> , Time <u>^-\.00</u> \ AM. □P.M.
	Nume and Location of Fire Station	
	Describe fire (where, color of smoke, cause): UNDER U	DOOD & THOCK SMOULE
	Was vehicle being driven? Yes No 0	Describe exactly what happened prior to noticing amoles
	or fire (electrical or mechanical mailtunction);	
	Were you carrying a container of flammable liquid in the vehicle	at the time of fire? Yes \(\sigma\)No
	If yes, give type of liquid	, armount, size and
	type of container Wh	, location of container at time of fire
	Did you smell smoke or see fames first? N	

Have you had similar problems prior to fire? Yes No If Yes, explain
Has vehicle been damaged during the past three years? Yes No If so, give location W// , and date W// , amount of damage \$ N// , and date W//
Were repairs made? Yes No Partiel If so, were they completed? Yes No
Who made the repeirs?
Any other claims in the last three years on this or any other auto? Yes No Name of insurance company and agent on other vehicles THE FREN
Your prior insurance company and agent 57475 FARL
Any homeowners claims within the past 6 months with State Farm?
With any other certier?
. Vehicle Equipment (Check if vehicle had any of the following)
☐ Radio AM ☐ Power Steer. ☐ Vinyl Roof ☐ Cruise Tires: Transmission:
AM/FM Power Brakes Tirrted Glass W/W Automatic
Stereo Power Locks Mag Wheels Padiel Standard
Tape Deck Power Windows T-Tops Special Console
Air Cond. Power Seats Tilt Steering Wheel
Other:
C8 Radio Type Cost \$ Date Installed U/45
Purchased From:
. Vehicle Condition
Paint Good Excellent trailer hitch, interior, etc.)
Trensmission Fair Good Decement
Engine Pair Good Excellent
Body
Name and address of service station/garage: <u>0.15 3001E. SounDERS</u>
Who performs routine maintenance service?
Who performs State MV inspection? State MV inspected 5 - 51
MAY 0 9 2002

LAREDO CSO

6. Date car purchased 38-14-00 New Queed Purchase price \$ 10, 600 00							
Trade-in Allowance							
Seller Dealer/Individual Name and Address Constantinos Arto SALES 31/5 Sale Decid April							
How did you fearn the car was for sale? DOVE BY							
How was the car paid for? ☐ Cash ☐ Check							
If financed, name and address of finance company 500TH TEXAS MALIONAL BOWL							
2811 QUADALUPE ST.							
Account # Balance Due \$ 3,5 Cro. Loan Terms 2422 Months 4							
Date of lest loan payment made 3-37-27-03-							
Is account past due? Yes No How long? 2. WEELS							
Are keys in your possession? Yes Ho Ignition key # Trunk key #							
Do you have other theft insurance? Yes No Policy #							
Name of insurance company							
Was this a rebuilt wreck? Yes No if yes, name of rebuilder /							
Was it a recovered theft? Yes No If yes, date of theft N/A							
7. Amount for which you are making claim \$ 14,000							
8. Are the enewers you have given true to the best of your knowledge and belief? Yes No							
Witness (Spend Signature)							
Address Dischart plade							
Addies							
· · · · · · · · · · · · · · · · · · ·							
SUBSCRIBED AND SWORN TO BEFORE ME this 6 H day of May							
n laredo Texas County, WERB							
Notary Public for a 14: Mario My commission expires: 2-Ko-02							
ANA, MARIA COCORDO							
Notary Public Chain of Taxon by Commission Equipme							

(1961-507

LAREDO FIRE DEPARTMENT XK-702 Proposed: 5/15/02: 16:46:08

Incident Report

Page 1

Program: FI200L

A XK702 TK FBES State

1/29/02 Station #6 Incident data Station

01-2002-0001-005-000 Incident meaher

HTH - L Basic

Mв 003L+00 Alternative location Common tract Intersection Lecation

Yes Emergency

4600 DAUGHERTY, LAMEDO, TX, 76040 Address

LEAL TO Cross street or directions

C Passanger vehicle fire Locident type

• Home kid glown or received

£1

fiee Jule 4/21/02 8:44:34 E2 Station LC Mift

3006 Still Alaem Histrict

Alares Bistrict

Arrival 4/25/02 8146:53 Controlled 0/00/00 0:00:00 Last woit cleared 4/21/02 1:03:05

F Fire, atter

Primary action takes (1) Establish fire lines (wildfire) Additional action taken (3)

Extinguish

Additional action takes (2)

Apparetus Personnel Ma Lesses Talus Apparatus/ Teppression 15000 3 4 Regerres counts Property 50**0**0 Bersonnel EHZ q 9 include sid Contracts 3000 5000 fore exed otker q 0 received resources

Juathu Injuries R2 Unknown Fire service 0 a letacter

Q

G

BB Nome

Mazardoss materials release

I But mixed use Aixed use preparty

Cirilian fire

J Tone Fregerty use

KL PASSERBY See. 0:000:00 idiress.

Reporting party

Involvement type

Phone number Business came

0/00/0000

Sunder Age Birth date Bace

M ZAMON LOPEZ Officer in charge JORGE STRUCKES Member making report Station Captian Position or rest Fire Fighter Position or rank

CAPTAIN issignoest . ASST. DRIVER Assignment

4/37/02 **J**ets 4/27/02 Mb

LAREDO FIRE DEPARTHERT XK-702 Prepared: 5/15/02. 16:46:88

Tacident Report

Page

Pregram: FTZOOL

A XK702 TX FBIR State

4/29/02 Station & Incident date Station

01-2002-0041-003-000 Incident musher

BFIRS - 2 Fire

MA Not residential Estimated number of

Am-wite material 1

residentlal units **#2** Buldings not involved

Busher of buildings invelved

83 Kans Acres burned (outside fires)

3% Engine area: running gear, wheel area area of fire origin

32 Undetermined Heat sperce 33 Undetermined Item first ignited

Spread confined to object of origin

DK Undetermined Type of material first ignited

Rome Equipment involved is ignition

6 Cana fire suppression factor 1

Hi Invelved in ignition and burned Ambile property involved

El Capse undetermined after investigation Cause of ignition

Factor 1 contributing to ignition

E3 Napa Rusan factors contributing to ignition

R Passager car Madfile property type Ford Maille property esta XLT 150 Makila property andel

15

3777

Tear License plate State

3FT9X37HBVK

LAREDO FIRE DEPARTHENY XX-702

Incident Report

Page

Propared: 5/15/82, 16:46:68 Program: FIZODI.

1	YK702 TI FBID State	4/24/02 Incident date	Station Station	•	01-2002-09060 Incident musbe	WIRS - 1/10 Apparatus/Personani	
•	Apparatus Type 3006 Engis Dispatched Hove Up Excoute At Scare *ERROR*	4/ 4/ 4/	27/02 A: 27/02 A: 27/02 A:	Forsennel 4 : 44 : 25 : 49 : 25 : 45 : 02 : 46 : 53 : 57 : 24	ecit noiseproquiz	Action taken	Kear g. Yes
	IN Zervice	47	24/02 1	:@:05			
	Emplayee 34 ROLE	RTO GARCIA JR.		iszigmaent PRIVER	Pasit	ion	Action taken
1868 VALENTIN GRTEGOR, JR 4285 VICTOR 6. TORRES 1417 RANGR LOPEZ				FINEFIGHTER FINEFIGHTER CAPTAIN	Fire	Fighter Fighter on Captian	

LARENO FIRE BEPARTMENT XX-702 Propared: 5/15/02. 16:46:04

Incident Report

Page 4

Program: FIZMAL

A XX702 TX FSED State 4/2VIB

Station PL Incident data Itatian

01-2002-0004-003-000

Incident number

Additional mehile property

Passenger car

Mabile property type

Ford ||ata

0310

findel

Tear #18

License Augher State

Prepared: 5/15/02, 16:46:08 Program: F1200L

4 XC702 TX

#/55/02 Station #L

01-2002-0001-005-100

F9ID State Incident date Station Iscident number

Barratives

Marrative type: Incident

Barative title

Entry data Entered by employee

Original Report-CAD

4/29/02

021340142

Calls: 057740145

Beat: 3006 ENGINE

Units: 30% truck an fire

Earrative title

Entry date Entered by employee

BEEL NARBATIVE

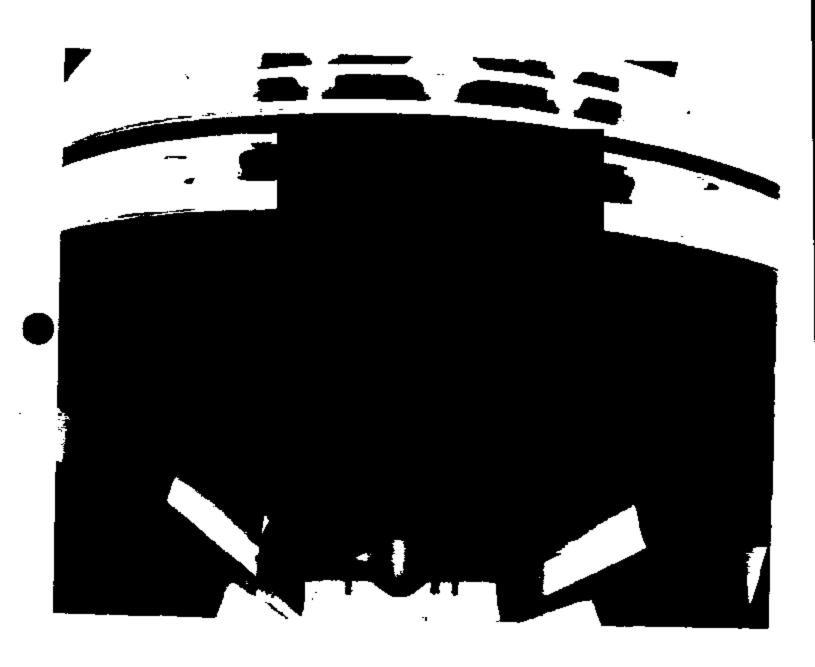
7176 JORGE SANCHEZ

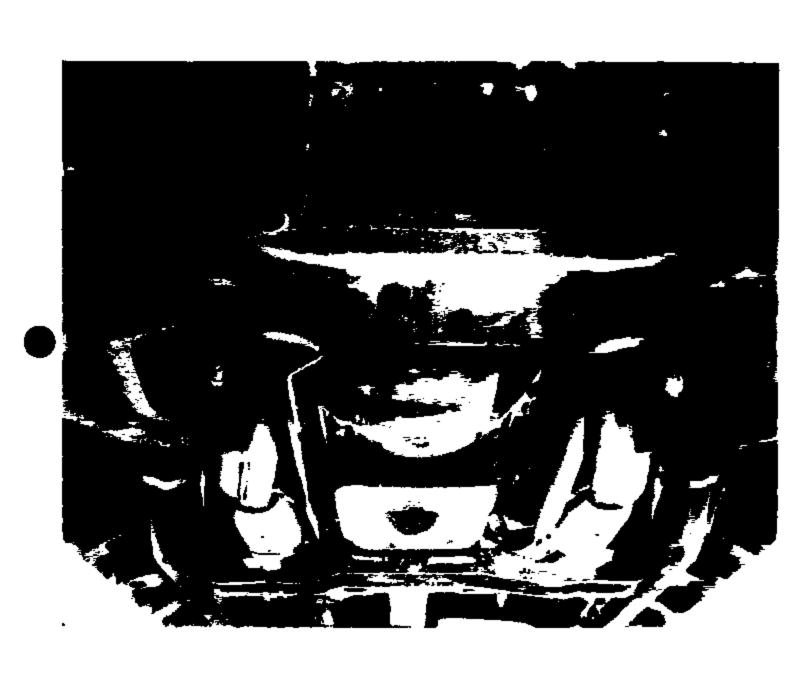
4/29/02 3006 NARRATIVE , STELL ALARM FOR 3006 AT 4448 BAUMERTY FOR A REPORTED

CEME. BOOLUSER SH' OF 3 " LINE 30% GALS. OF WATER . 3 WALIGAM TOOL . A

NE RANFOWER .

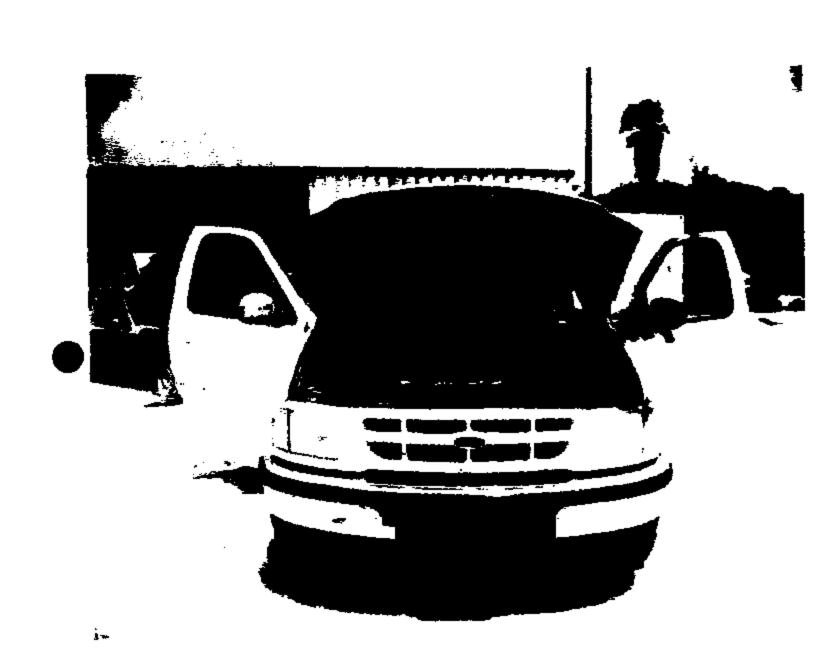






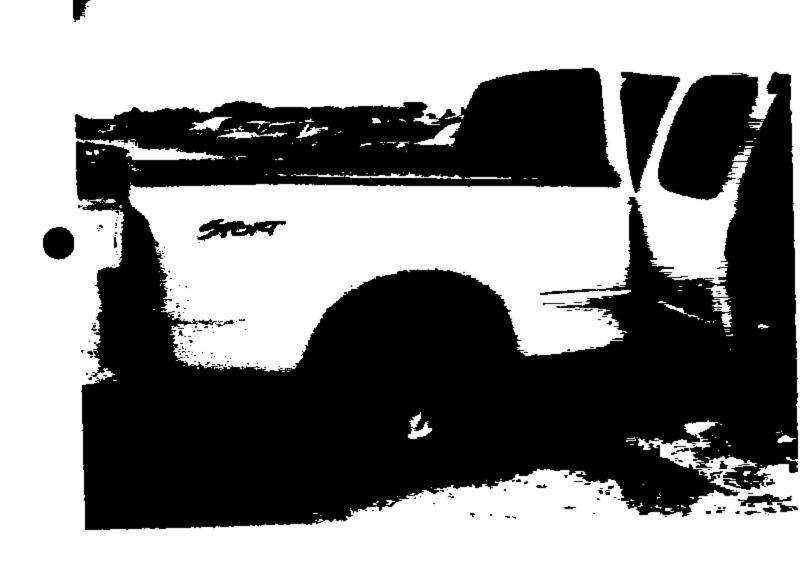


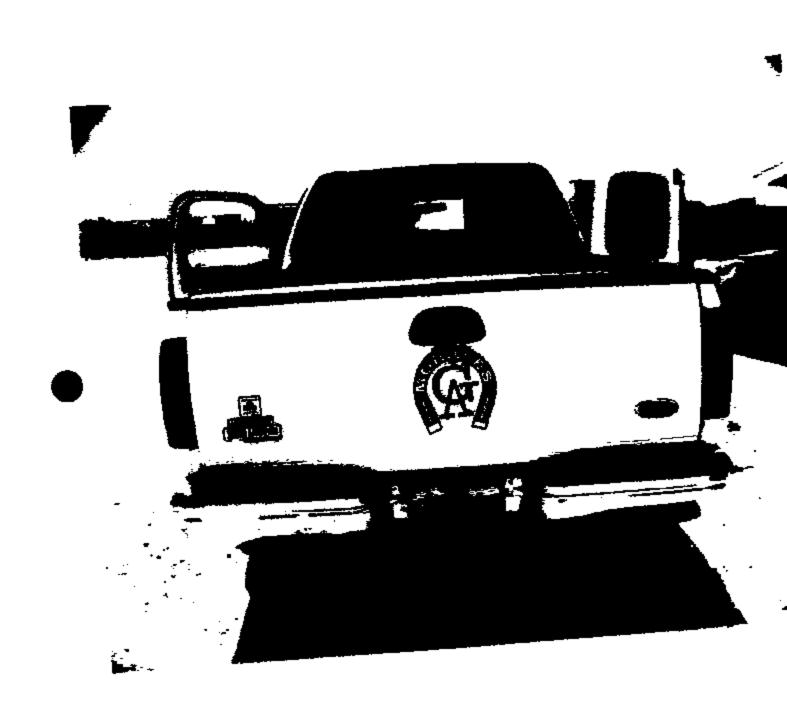


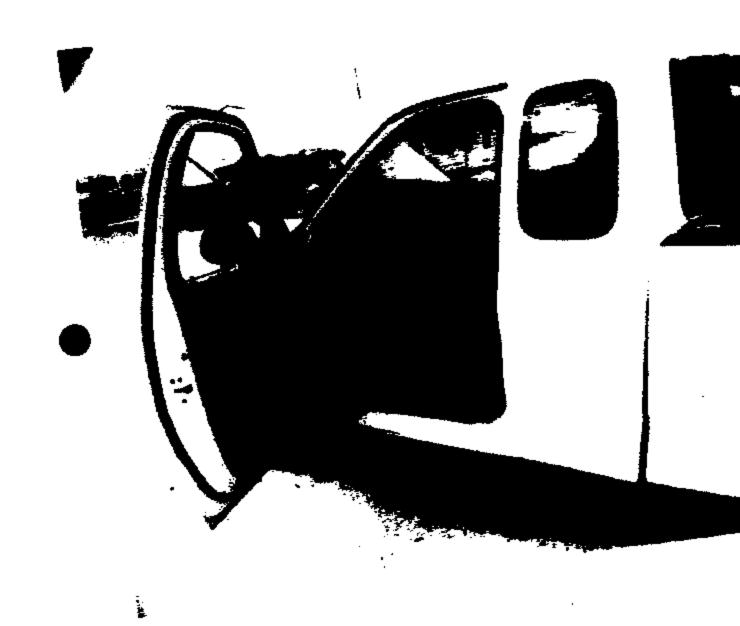


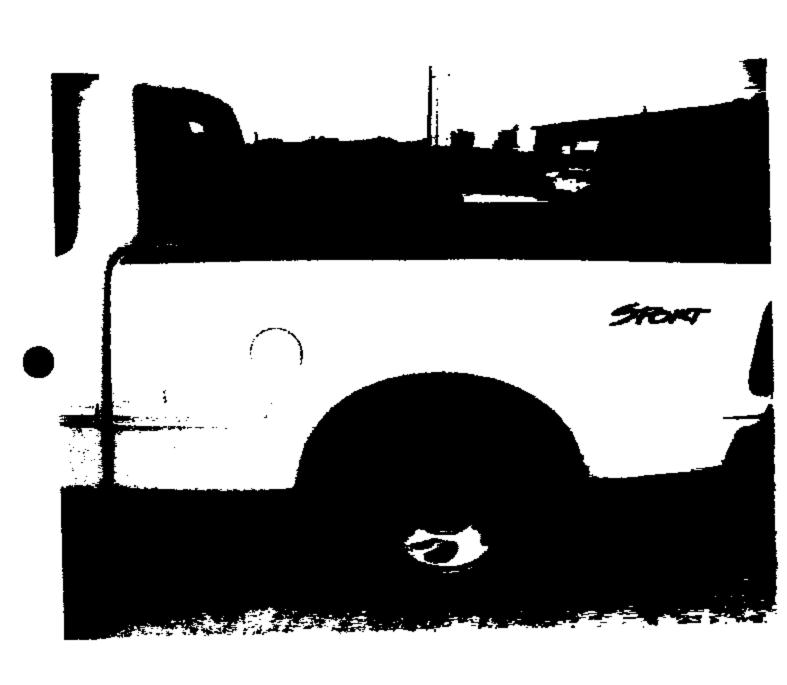










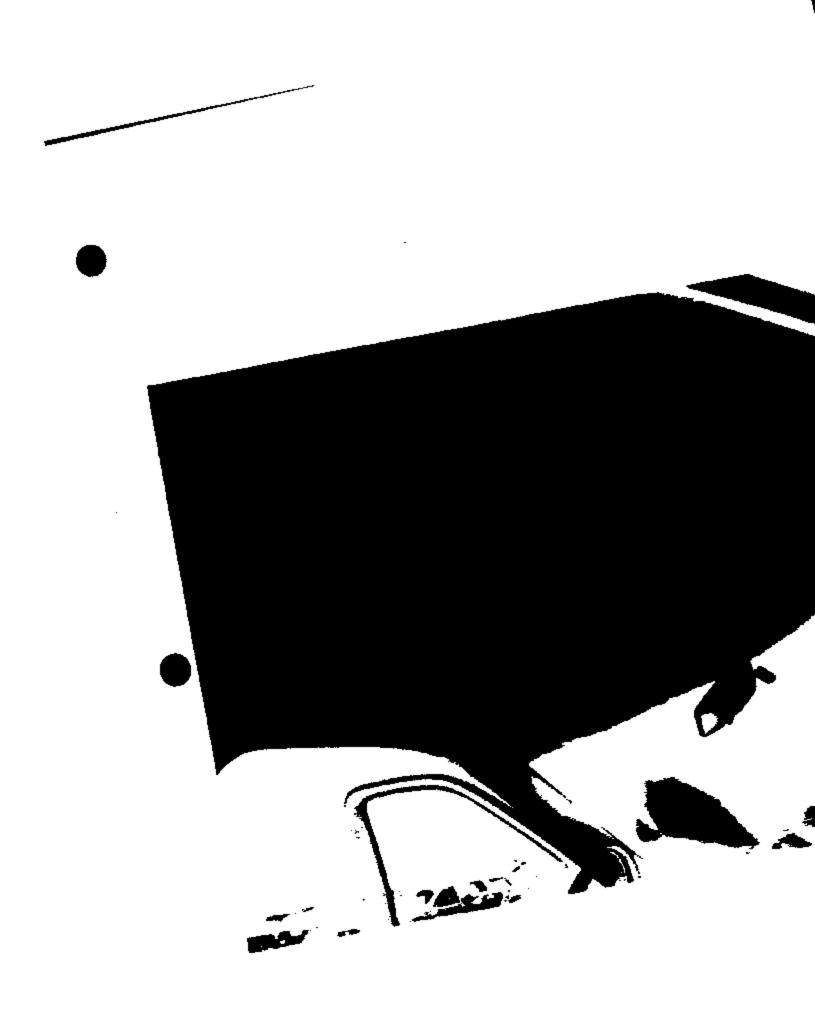










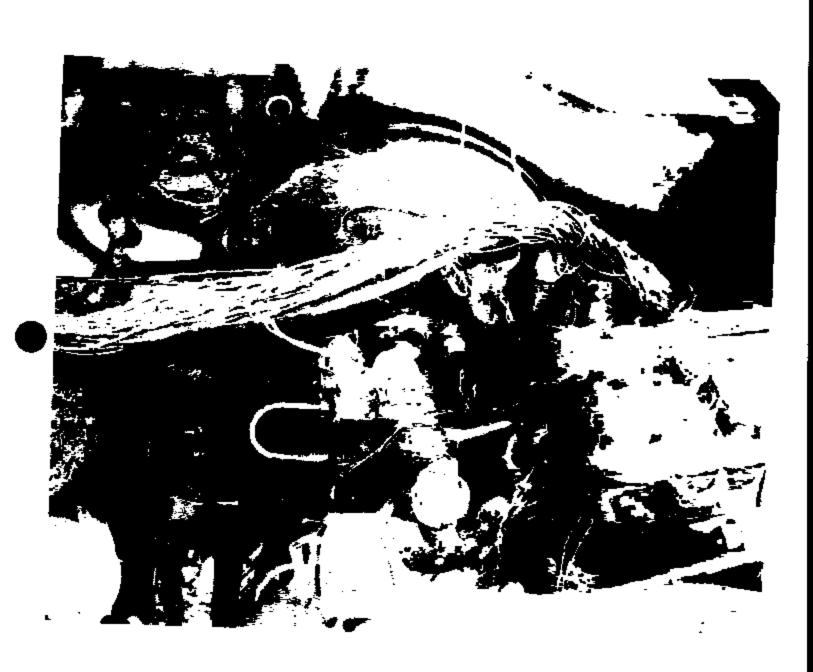














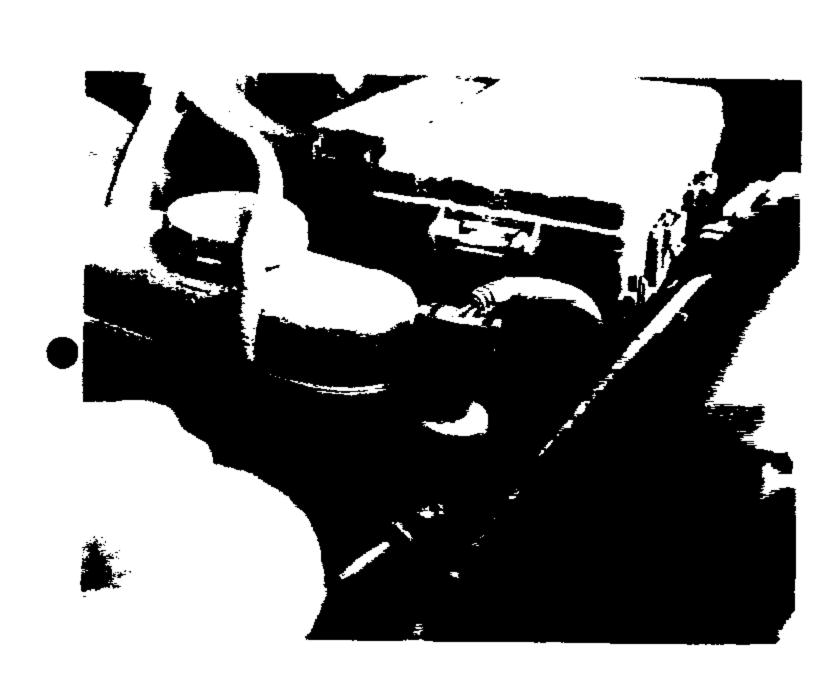


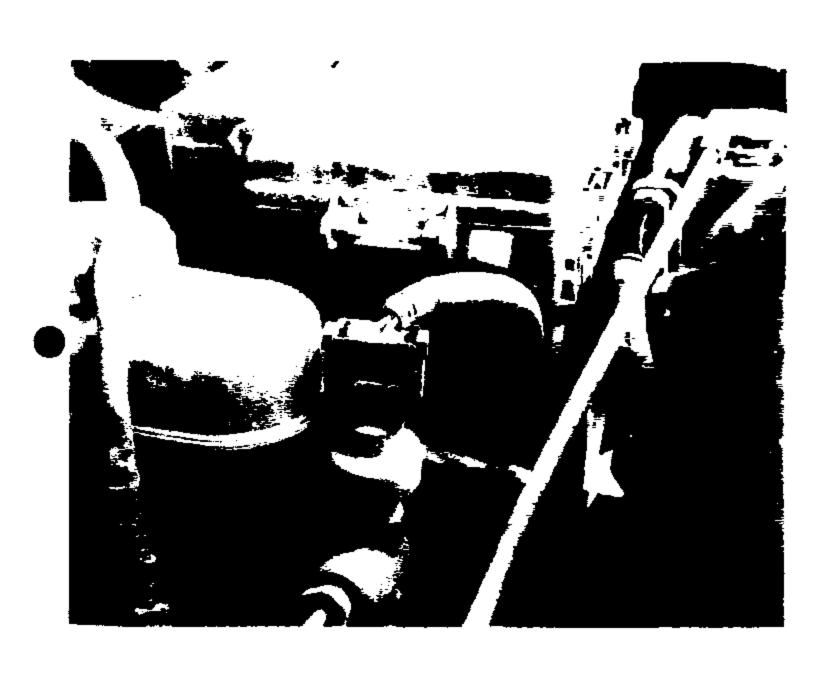
















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