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INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

DDM Consultants
22357 Columbia Street
Dearborn, MI 48124-3431
313-277-5095
pvs6@Cornell.edu
24 April 2012

MAY - 2 2012

Representative Elijah Cummings
2235 Rayburn House Office Building
Washington, DC 20515-2007
202-225-4741

Representative Mike Kelly
515 Cannon House Office Building
Washington, DC 20515-3803
202-225-5406

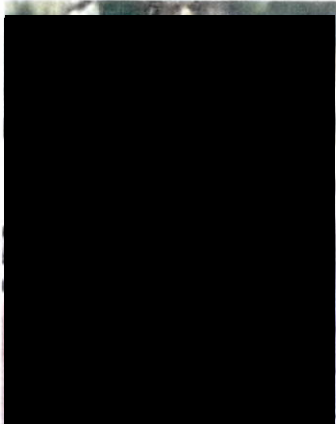
Representative James D. Jordan
1524 Longworth House Office Building
Washington, DC 20515-3504
202-225-2676

Representative Dennis Kucinich
2445 Rayburn House Office Building
Washington, DC 20515-3510
202-225-5871

Subject: 1993-2004 Jeep Grand Cherokee Post-Collision Fire Death Defect Investigation
Reference 1: House Oversight and Government Reform Hearing (Chevrolet Volt) of 25 Jan 2012
Reference 2: My Letter/Binder to you of 13 February 2012 (same subject)

Gentlemen:

I have confirmed, via telephone calls to your office, that you are in receipt of Reference 2 (Attachment 1). I can only speculate that the reason I have not yet received a response is due to my non-constituent status (Attachment 2).



Accordingly, four-year-old [REDACTED] was also not a constituent but his innocent status is not a viable basis for discounting my letter of 13 February 2012.

On 6 March 2012, one month after you received Reference 2, the young boy pictured at-left burned to death in a subject vehicle. The details of the fire-death of [REDACTED] are too horrific to document here. The Jeep Grand Cherokee, the model that killed [REDACTED] was not the part of a *series of hearings which focused on a single, isolated incident at a junk yard wherein not one injury and not one death occurred*. Unlike the Chevrolet Volt, the 1993-2004 Jeep Grand Cherokee presents a defective fuel tank/system design. This defect is central to my thus-far ignored hearings request to you of 13 February 2012.

I have reviewed this situation with those more astute (than I) in the area of "politics." They advise me that, similar to the true motivations of Reference 1, Chrysler Group LLC is potentially regarded as sacrosanct in the context of various Administration bailout claims and related re-election rhetoric.

We must not tolerate the possibility that auto safety could be reduced to statistics or ignored further in the context of partisan political agendas. I will serve as plaintiff's expert in upcoming litigations that relate to the subject. I will review your response to my letter of 13 February 2012 as **indicative** of two issues: 1) The alleged overall real-world competence of NHTSA safety regulations, and 2) The Congressional process that oversees that alleged competence. As you are fully aware, mere compliance with NHTSA safety regulations is the notorious posture of the corporate defense bar. These corporate entities have access, aggressive lobbying, and campaign funding wherewithal; a wherewithal that is not available to non-constituents like the family of the little boy pictured above (Attachment 3).

Cordially,

Paul V. Sheridan

Attachments

Courtesy Copy List

(24 April 2012)

Subject: 1993-2004 Jeep Grand Cherokee Post-Collision Fire Death Defect Investigation
Reference 1: House Oversight and Government Reform Hearing (Chevrolet Volt) of 25Jan2012
Reference 2: My Letter to Congress of 13 February 2012 (same subject)

The Honorable David L. Strickland
Administrator
NHTSA Headquarters/West Building
1200 New Jersey Avenue, SE
Washington, DC 20590
888-327-4236

President Barack Obama
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500
202-456-1414

Mr. Clarence Ditlow, Director *
Center for Auto Safety
Suite 330
1825 Connecticut Ave, NW
Washington, DC 20009-5708
202-328-7700

Mr. Otto Matheke *
Senior Attorney
NHTSA Headquarters/West Building
1200 New Jersey Avenue, SE
Washington, DC 20590
888-327-4236

Congressman John D. Dingell *
2328 Rayburn House Office Building
District of Columbia 20515-2215
202-225-4071

The Honorable Ray LaHood
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590
202-366-4000

Mr. Sergio Marchionne, Chairman
Chrysler Group LLC
1000 Chrysler Drive
Auburn Hills MI 48321-8004
248-576-5741

Mr. Courtney E. Morgan, Jr. *
Morgan & Meyers, PLLC
Suite 320
3200 Greenfield Road
Dearborn, MI 48120
313-961-0130

Mr. Lewis H. Goldfarb **
1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, NJ 07962-2075
973-993-8100

Representative Darrell E. Issa
Chairman
2157 Rayburn House Office Building
Washington, DC 20515
202-225-5074

* By Email

** Please see Attachment 3.

Attachment 1



FedEx Express
Customer Support Trace
3875 Airways Boulevard
Module H, 4th Floor
Memphis, TN 38116

U.S. Mail: PO Box 727
Memphis, TN 38194-4643
Telephone: 901-369-3600

February 15, 2012

Dear Customer:

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Signed for by:	E.GREEN	Delivery location:	9140 EAST HAMPTON 20515
Service type:	FedEx 2Day Box	Delivery date:	Feb 15, 2012 10:02

Shipping Information:

Tracking number:	869449983913	Ship date:	Feb 13, 2012
		Weight:	5.0 lbs/2.3 kg
Recipient:	Shipper:		
REPELIJAH CUMMINGS	PAUL SHERIDAN		
-	SHERIDAN, PAUL V		
2235 RAYBURN HOB	22357 COLUMBIA ST		
20515 US	481243431 US		
Reference	PE-10031		

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February 15, 2012

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Shipping Information:

Tracking number:	869449983898	Ship date:	Feb 13, 2012
		Weight:	5.0 lbs/2.3 kg

Recipient:

REP JAMES JORDAN

1524 LONGWORTH HOB
20515 US

Reference

Shipper:

PAUL SHERIDAN
SHERIDAN, PAUL V
22357 COLUMBIA ST
481243431 US

PE-10031

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Telephone: 901-369-3600

February 15, 2012

Dear Customer:

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Shipping Information:

Tracking number:	869449983924	Ship date:	Feb 13, 2012
		Weight:	5.0 lbs/2.3 kg
Recipient:		Shipper:	
REP MIKE KELLY		PAUL SHERIDAN	
515 CANNON 40B		SHERIDAN, PAUL V	
20515 US		22357 COLUMBIA ST	
		481243431 US	
Reference		PE-10031	

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February 15, 2012

Dear Customer:

The following is the proof-of-delivery for tracking number **869449983902**.

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Service type:	FedEx 2Day Box	Delivery date:	Feb 15, 2012 10:02

Shipping Information:

Tracking number:	869449983902	Ship date:	Feb 13, 2012
		Weight:	5.0 lbs/2.3 kg
Recipient:	Shipper:		
RED DENNIS KUCINICH	PAUL SHERIDAN		
-	SHERIDAN, PAUL V		
2445 RAYBURN HOB	22357 COLUMBIA ST		
20515 US	481243431 US		
Reference	PE-10031		

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DDM Consultants
22357 Columbia Street
Dearborn, MI 48124-3431
313-277-5095
pvs6@Cornell.edu

13 February 2012

Representative Elijah Cummings
2235 Rayburn House Office Building
Washington, DC 20515-2007
202-225-4741

Representative Mike Kelly
515 Cannon House Office Building
Washington, DC 20515-3803
202-225-5406

Representative James D. Jordan
1524 Longworth House Office Building
Washington, DC 20515-3504
202-225-2676

Representative Dennis Kucinich
2445 Rayburn House Office Building
Washington, DC 20515-3510
202-225-5871

Subject: 1993-2004 Jeep Grand Cherokee Post-Collision Fire Death Defect Investigation
Reference: House Oversight and Government Reform Hearing (Chevrolet Volt) of 25Jan2012

Gentlemen:

Before we discuss the subject/reference, I am compelled to impose upon you. Please first review the contents of Tab 1. Please now review Page 4 of Tab 4.

In the instance of Mrs. [REDACTED] she was **not** a passenger in a Chevrolet Volt during a routine NHTSA crash test. This is also true for [REDACTED] when this lovely 4-year-old toddler was horribly burned to death in 2006. Similar horror has afflicted many others.

Hearings convened at taxpayer expense which are focused on allegations of politically-biased misdeeds are not unusual. But when politics interferes-with or diverts attention from truly meritorious safety issues, then notice must be placed.

In your hearing with Mr. David Strickland of the National Highway Traffic Safety Administration (NHTSA), you appeared satisfied with the notion that the post-collision fire injury/death risk of the Chevrolet Volt is "*no greater than gasoline fueled vehicles.*" This notion lacks perspective and priority.

As Mr. Strickland is fully aware, **during** the time that taxpayer dollars were expended on investigation of the Chevrolet Volt post-crash test technician issues*, at least three additional horrific fire-related death and injuries occurred in the subject vehicles. The NHTSA investigation into these defective 1993 through 2004 Jeep Grand Cherokee vehicles has been dragging on since October 2, 2009. If you doubt my studied opinion that the subject vehicles are not crashworthy, and therefore are defective, then perhaps you should review the sworn testimony of the Chrysler executive engineer that is responsible for the design.

* Although serious, this issue resulted in a minor fire, occurring three days later in an abandoned junk yard wherein no one was injured, let-alone burned to death.

On March 14, 1996, in a Jeep crashworthiness severe-injury litigation, Chrysler Executive Vice President of Engineering and then Jeep Product Executive Mr. Francois J. Castaing testified as follows:

Plaintiff: *What does the term crashworthiness mean in terms of design of a product?*
Castaing: *I don't know. Tell me.*
Plaintiff: *You don't know the phrase?!*
Castaing: *No.*
Plaintiff: *Well, let me make sure I'm clear on this. As the chief engineer of the company, are you at all familiar with the use of the phrase 'crashworthiness' by the engineers of the company?*
Castaing: *Crashworthiness is so vague that you have to tell me what you intend by that.*

I am confident that no General Motors executive has testified in a similar manner regarding the Chevrolet Volt. (Formerly Mr. Castaing reported to Chrysler President Robert A. Lutz, who is currently functioning as a consultant to GM on issues such as the Chevrolet Volt.)

Delayed public notification of a serious safety risk?

Congressman Jordan proclaimed that the issue was "*delayed public notification of a serious safety risk.*" In this context I am requesting that you convene hearings on NHTSA PE-10031. To introduce you to the merits of this request I am (also) attaching the following documents:

- Tab 2: Center for Auto Safety (CAS) Jeep Grand Cherokee Defect Petition of October 2, 2009
- Tab 3: Paul V. Sheridan letter to CAS of June 1, 2010
- Tab 4: CAS letter to Chrysler-Fiat Chairman Sergio Marchionni of September 1, 2011
- Tab 5: Paul V. Sheridan letter to Mr. David Strickland of September 27, 2011
- Tab 6: CAS letter to Chrysler-Fiat Chairman Sergio Marchionni of November 17, 2011
- Tab 7: Paul V. Sheridan letter to Mr. David Strickland of December 5, 2011
- Tab 8: CAS letter to Chrysler-Fiat Chairman Sergio Marchionni of January 25, 2012
- Tab 9: ABC News Reports on Subject (dvd) + Digital version of this letter w/hyperlinks (cd)
- Tab 10: NHTSA-Chrysler-DOJ Defect Investigation FOIA Conspiracy

I am not discounting the additional context voiced at the reference, that political and corporate influence has the potential to corrupt the primary mission of NHTSA: the safety and well-being of all who utilize American roadways. Indeed, I am not aware of any other automotive safety expert that has been victimized by that influence to a greater extent than the undersigned (Tab 10).

I am confident that President Obama was not aware of the Castaing testimony at the time he purchased his 2000 Jeep Grand Cherokee. Ostensibly speaking, your satisfaction with the notion that the post-collision fire injury/death risk of electric vehicles is "*no greater than*" the 1993 through 2004 Jeep Grand Cherokee lacks proper perspective and priority.

Respectfully,

Paul V. Sheridan
National Champion – Civil Justice Foundation

Attachments/Enclosures

Courtesy Copy List

(Cover Letter plus Tab 10 Only)

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888-327-4236

Mr. Daniel F. Akerson
Chairman and CEO
General Motors
300 Renaissance Center #L1
Detroit, MI 48243-1403
313-556-5000

Mr. Courtney E. Morgan, Jr. ■
Morgan & Meyers, PLLC / Suite 320
3200 Greenfield Road
Dearborn, MI 48120
313-961-0130

Congressman John D. Dingell ■
2328 Rayburn House Office Building
District of Columbia 20515-2215
202-225-4071

Mr. Clarence Ditlow, Director ■
Center for Auto Safety
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1825 Connecticut Ave, NW
Washington, DC 20009-5708
202-328-7700

Mr. Robert A. Lutz ■
Technical Consultant
General Motors
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Detroit, MI 48243-1403
313-556-5000

Mr. Lewis H. Goldfarb ■
1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, NJ 07962-2075
973-993-8100

Mr. Otto Matheke ■
Senior Attorney
NHTSA Headquarters/West Building
1200 New Jersey Avenue, SE
Washington, DC 20590
888-327-4236

- Individuals directly involved with the portent and consequences of Tab 10.
- Individuals familiar with the portent and/or consequences of Tab 10.



MINIVAN LATCH ISSUE

Proposed Agreement with NHTSA

1. Crash Test Video and the Public Record:

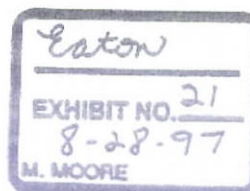
- NHTSA has agreed that they will deny all FOIA requests to place their investigative files, including the crash test video, on the public record and that the Department of Justice will defend any lawsuits seeking to compel production under FOIA.

We would agree with NHTSA that their engineering analysis will remain open while we conduct the service campaign to provide them additional bases to argue that release of the materials would interfere with their investigation.

- The Department of Justice says there is less than a 50/50 chance of keeping the video off the record for the full duration of the investigation, i.e. the campaign, if there is a court ruling. Given the possibility that a lawsuit could be filed at any time, they anticipate that the legal process would take at least four months, regardless of the outcome.

2. Service Action Only - No Recall: NHTSA has agreed that a Chrysler service campaign would fully satisfy all of their concerns and they would give full public support to such an effort. The critical elements that differentiate the service campaign from a recall (mostly reflected in the two attached letters) are as follows:

- no admission of defect or safety problem;
- stated purpose of the campaign - to ensure peace of mind in light of media coverage;
- campaign does not count as a NHTSA action - not included in NHTSA recall numbers, no Part 573 or Part 577 letters;
- statements to owners, the public and NHTSA assert that no defect has been found; and
- NHTSA acknowledges that replacement latch is not a 100% solution.



3. Chrysler Announcement: Chrysler controls publication of its action with the following provisions:

- Chrysler goes first with its own statement and reads approved NHTSA statement supporting Chrysler's action;
- Chrysler characterizes campaign as done solely to ensure the peace of mind of its owners, i.e. "your concern is our concern";
- Letter from Martinez to Chrysler and NHTSA press statement praise Chrysler action as fully satisfying all of NHTSA's concerns and state that Chrysler is a safety leader;
- NHTSA officials acknowledge publicly that there has been no finding of defect and that there will be none; and
- NHTSA officials acknowledge that owners should not be concerned over the delayed implementation of the action and that they can best protect themselves by keeping seat belts buckled at all times.

4. Additional Provisions: The following points have been requested by NHTSA and appear to be reasonable:

- The letter to owners makes reference to the NHTSA hot line phone number;
- Latch replacement will be offered as part of any routine minivan servicing (once replacement latches are available);
- Chrysler will submit six quarterly reports on the progress of the campaign (helps to support defense of FOIA requests); and
- NHTSA can make reference to the service campaign in response to owner inquiries.

Attachment 2

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Dennis J. Kucinich (D-OH 10th)

☐☐

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Jim Jordan (R-OH 4th)



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Alternately, you may indicate below if you want to send a message to your representative instead, or you may choose not to send the message at all.

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Elijah E. Cummings (D-MD 7th)

☐☐

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Attachment 3

Dear Friends:

As you probably know, Jackie Glassman has recently been appointed Chief Counsel of the National Highway Traffic Safety Administration. We cordially invite you to join us for a reception in Jackie's honor:

**Thursday, March 14, 2002
5:30 pm – 7:30 pm**

Fulbright Center
Hogan & Hartson L.L.P.
555 13th Street, N.W.
13th Floor – West Tower
Washington, DC

R.S.V.P. to Angela Minor at arminor@hhlaw.com.

— HOGAN & HARTSON LLP —

Attachment 4

Breaking News

[Burkes, Dukes headed to Democratic National Convention](#) April 24, 2012

[Supreme Court upholds life sentence in Dougherty murder case](#) April 24, 2012

Remington Cole Walden

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Thursday, March 8, 2012

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BAINBRIDGE -- Remington "Remi" Cole

Walden, 4 year old son of Bryan and Lindsay Walden, passed away Tuesday, March 6, 2012.

The funeral service will be held at 2:00 p.m. on Saturday, March 10, 2012 at the Kirbo Center with Pastor Jaime Rivera, Pastor Dan Tomberlin, and Pastor Tim Dean officiating. Interment will follow at Mt. Pleasant Baptist Church Cemetery with Trey Barnard, Hayes Green, Matthew Reynolds, Eric Inlow, Keith Harrison, and Rob Green serving as active pallbearers. Honorary pallbearers will be Tim Dean, Brian Palmer, Brett Trammell, and Mike Newsome.

Remi was born April 9, 2007 in Bainbridge, GA. He was in Mrs. Rentz's Pre- K class at Jones-Wheat Elementary School and was a member of Bainbridge Church of God. Remi loved time at the beach, swimming, and playing tennis and tee ball.

In addition to his parents, survivors include his maternal grandparents, Eddie and Patricia Newsome of Bainbridge, GA; his paternal grandparents, the late Steve Eakin and Debra Eakin of Climax, GA; his uncles, Stephen Eakin of Valdosta, GA and Matthew Newsome of Athens, GA; his aunts, Nikki Langdon and her husband, Tim, of Bainbridge, GA, Kristie Eakin of Bainbridge, GA, and Emily Newsome of Bainbridge, GA; his paternal great-grandmothers, Dorothy Walden of Bainbridge, GA and Jeanette Eakin of Bainbridge, GA; his maternal great-grandmother, Maybell Green of Bainbridge, GA; and numerous cousins.

The family will receive friends from 6:00 to 8:00 p.m. on Friday, March 9, 2012 at Bainbridge Church Of God, 205 Independent Street, Bainbridge, GA 39817. Online visitors may sign the guest register at www.iveyfuneral.com.

Ivey Funeral Home

Bainbridge 229/246-3232

END OF DOCUMENT

Letter of 24 April 2012