IN THE SUPERIOR COURT OF DECATUR COUNTY
STATE OF GEORGIA

Filed in Open Court
Date: 9-2-15
Time: 6:30 pm
Decatur County, Georgia

[redacted] Individually and on Behalf of the Estate of Their Deceased Son, [redacted]

Plaintiffs,

vs.

CHRYSLER GROUP LLC, n/k/a FCA US LLC and BRYAN L. HARRELL,

Defendants.

CIVIL ACTION
FILE NO. [redacted]

SPECIAL INTERROGATORIES AND VERDICT

In the matter above-styled, we the jury find as follows:

Answer the following questions:

1. Do you find that Chrysler Group acted with a reckless or wanton disregard for human life in the design or sale of the 1999 Jeep Grand Cherokee and that such conduct was a proximate cause of damages for which the Plaintiffs may recover?

Yes (yes or no)

2. Do you find that Chrysler Group had a duty to warn and failed to warn of a hazard associated with the use of the 1999 Jeep Grand Cherokee and that such failure to warn was a proximate cause of damages for which the Plaintiffs may recover?

Yes (yes or no)

3. Do you find that Defendant Bryan Harrell's negligence, which he has admitted, proximately caused damages for which the Plaintiffs may recover?

Yes (yes or no)

4. State the amount of damages, if any, you find Plaintiffs are entitled to recover from the Defendant or Defendants you have found responsible for:

Pain and suffering: $ [redacted] 30 million

Full value of the life of [redacted]: $ [redacted] 120 million

5. State the percentage of fault of each Defendant (total must equal 100%):

1 % Bryan Harrell and

99 % Chrysler Group

SO SAY WE ALL.

This 2nd day of April, 2015.

Foreperson

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23 April 2015

VIA FEDEX AIRBILL 8007 – 9341 - 6009

Attorney General Bill Schuette
7th Floor
G. Mennen Williams Building
525 W. Ottawa Street
Lansing, MI 48909
517- 373-1110

Subject: **Criminal Investigation of those Responsible for the Manslaughter of Ms. [redacted]**
Reference: **Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect**

Courtesy Copy List *

[redacted]

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

[redacted]

* *By email and/or USPS*

** Up-to-date PDF version available with active hyperlinks :

[redacted]

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Subject: **Criminal Investigation of those Responsible for the Manslaughter of Ms. [redacted]**
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Dear Mr. Schuette:

The 'Public Integrity' tab of the Michigan Attorney General website states :

"February 2011, Attorney General Schuette created a new Public Integrity Unit to ramp up the fight against corruption in state and local government, protect tax dollars and restore the public's trust in government." [A]

At the Biography tab of the website, the following is stated about you:

"From his father, mother and stepfather, Bill learned the basic Michigan values of honesty, hard work, the importance of your word, strength of family and the need to give back to your community." [B]

With these as partial context, it would be prudent not to interpret what follows as emotional, or diatribe, an exaggeration, or strident. Given the gravity of the subject, such an interpretation would strain these quotes.

Perspective for Subject : 1% versus the 99%

Picture the following results from a prosecution that your office rendered:

The horrific death of a 4-year-old child results in the conviction of the two parties responsible. The jury is instructed to assign proportional responsibility.

The first party openly and honestly admits both guilt and partial responsibility for the manslaughter. Although the jury assesses a proportion of only 1%, this first party is sentenced to a 7-year prison term.

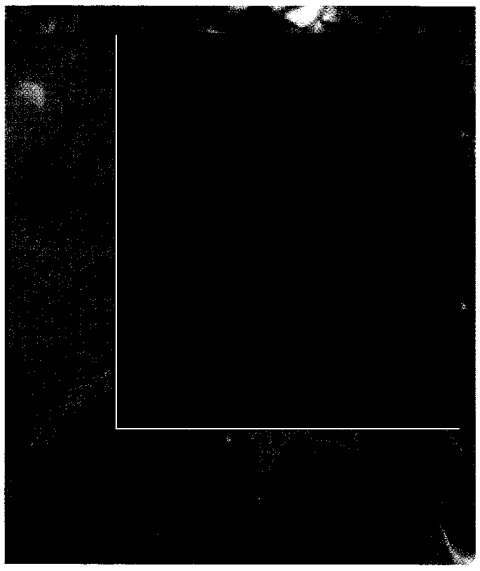
Despite overwhelming culpatory evidence, the second party denies any guilt and refuses responsibility. Indeed the evidence is so convincing that the jury assesses a proportion for this second party of 99%. But the judicial system sets the 99% party free, to enjoy life, limb and luxury.

The facts just presented are not based on fiction. Nor is the basis merely a civil matter. Only the uninformed, or knowledgeable but corrupt and servile, would deny that the Subject is appropriate.

That the Subject is criminal is clarified with a brief introduction to *some* of the victims of Reference 1. The victims are two-fold. The secondary victim is 1% guilty. Some of the primary victims are discussed next. But in the final analysis, even the 1% are innocent when compared to the torrid history of the 99%.

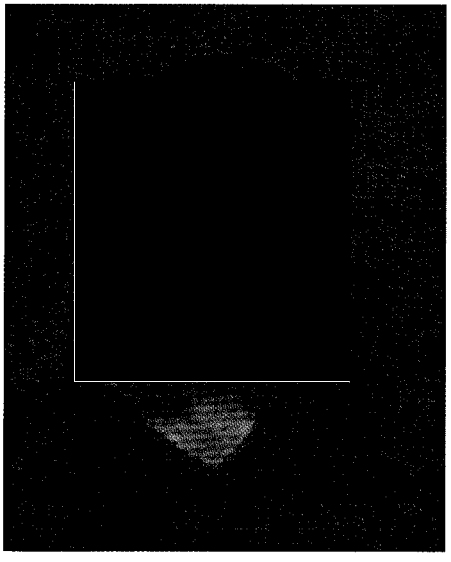
Review of Some *Primary* Victims of the Jeep Fuel System Crashworthiness Defect

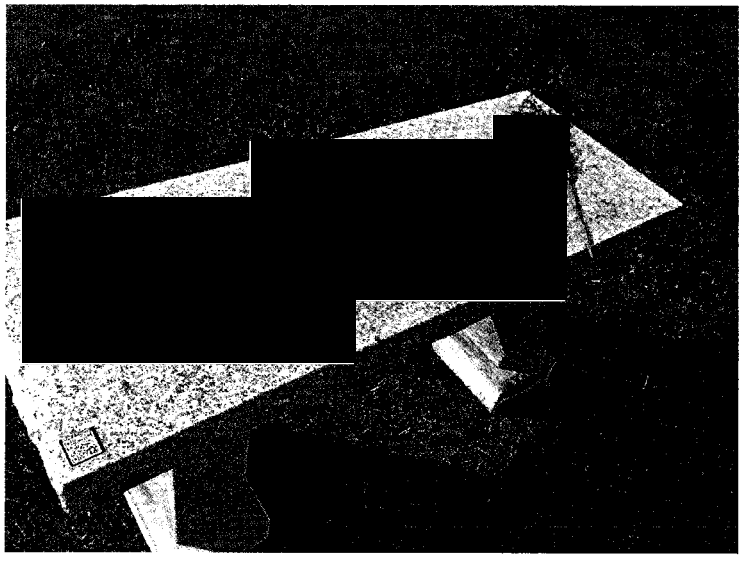
The driver who caused the collision on a quiet Georgia street on March 6, 2012 did so as a result of a momentary lapse of attentiveness. But the group that caused the fire that killed 4-year-old [redacted] did so as a result of decades of criminal activity. This incident and related historical reality was the basis of the jury assignments of 1% and 99% respectively. [C]



The driver, to whom the jury assigned a fault of only 1%, owned the collision. He now has a criminal record. [redacted] survived the collision, but Fiat-Chrysler Automobiles (FCA), at a fault of 99%, **owned the fire** [E] the killed him. [D] The autopsy proved that fact. But FCA remains free to enjoy life, limb and luxury.

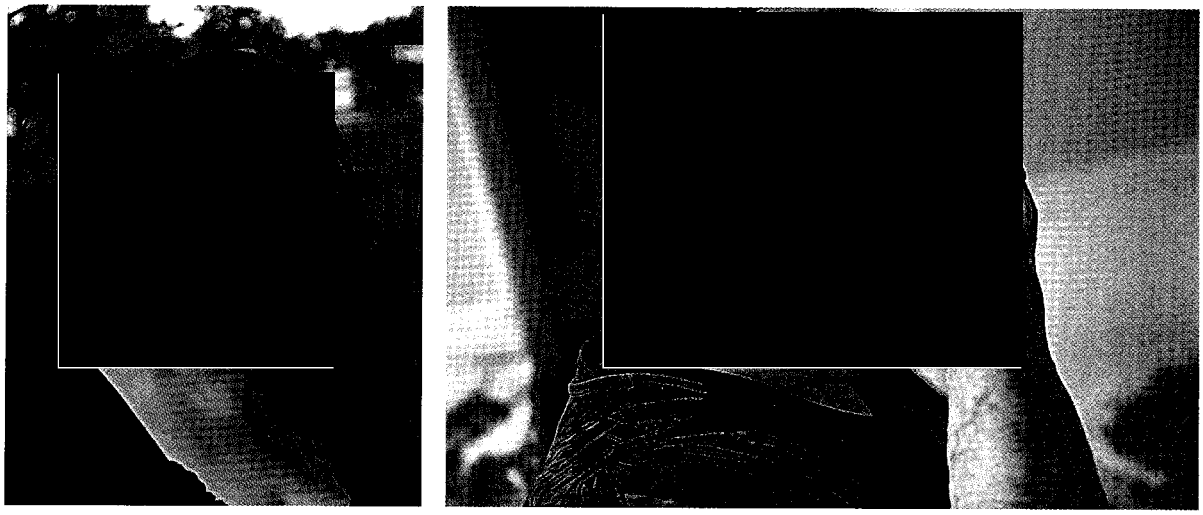
A similar scenario is facing the [redacted] family. Two men who allegedly caused the collision in Massachusetts on November 10, 2013 had a momentary lapse of judgment. But FCA caused the fire that killed 17-year-old [redacted] the result of decades of criminal activity.





The two men are facing criminal prosecution. Seventeen-year-old [redacted] survived the collision, but FCA, **the group that owns the fire**, is free to enjoy life, limb and luxury. [F]

A similar scenario is facing the family of [redacted] The person who caused the collision on an Indiana highway on January 14, 2012 was inattentiveness . . . ordinarily just a civil matter. The group that caused the fire, that horribly burned [redacted] did so as a result of decades of criminal activity.



The driver that collided with the rear of [redacted] Jeep Cherokee admitted guilt, and is facing criminal prosecution. [redacted] survived the collision, as did EVERYONE else, but FCA, the group that **owns the fire**, denies responsibility, faces no criminal prosecution, and is free to enjoy life, limb and luxury.

A similar scenario faces the [redacted] brothers, [redacted]. The lady who caused the collision in California on April 5, 2014, had a momentary lapse of judgment. The group that caused the fire, that horribly burned *both* [redacted] did so as a result of decades of criminal activity.

The driver of the Honda who caused the collision admitted guilt, took responsibility, and is facing criminal prosecution. But FCA, the group that **owns the fire**, denies any responsibility, and claims that the Jeep, which caused the raging inferno shown above, contains no safety defect. FCA claims the Jeep *"met or exceeded all government standards."* FCA remains free to enjoy life, limb and luxury.

The case that faced the family of [redacted] was anything but simplistic. I am the person that informed the Center for Auto Safety (CAS) of the horrific fire-death of a 49-year-old mother and wife. This information catalyzed their Defect Petition that led to the National Highway Traffic Safety Administration (NHTSA) to commence defect investigation EA12-005 [G]

Eyewitnesses confirmed that [redacted] survived the collision but burned to death in a Jeep Grand Cherokee:

The Jeep Fuel Tank Crashworthiness Defect : A History Based in Criminality

Contrary to the PR deployed by FCA in defense of the [redacted] litigation, the essence of the events that burned [redacted] to death on February 24, 2007 is captured by the words of an eyewitness [H]

"The back of the Jeep immediately burst into flames upon impact. I drove through the debris and fireball caused by the Jeep exploding."

A former FCA employee, a man of experience and integrity, Mr. [redacted] testified (for the defendant) regarding a photograph that CAS and I supplied to attorney Angel Defilippo; a photograph that depicts the exact configuration of the [redacted] Jeep:

DeFilippo: Now, in looking at that photo, can you tell me what part of the vehicle protects the part of the tank that we're looking at in that photograph?

Banta: *No. It's covered by the fascia.*

DeFilippo: So if a vehicle were to strike just that **yellow piece of the car**, whether it be because it's lower or some kind of vehicle that's not even a car, let's say it was a recreational vehicle of some sort, what would protect that portion of the tank that we see here in **yellow**.

Banta: *Just the tank surface itself.*

DeFilippo: So in other words, whatever the material of the tank is at the time?

Banta: ***The tank's on its own.*** [I]

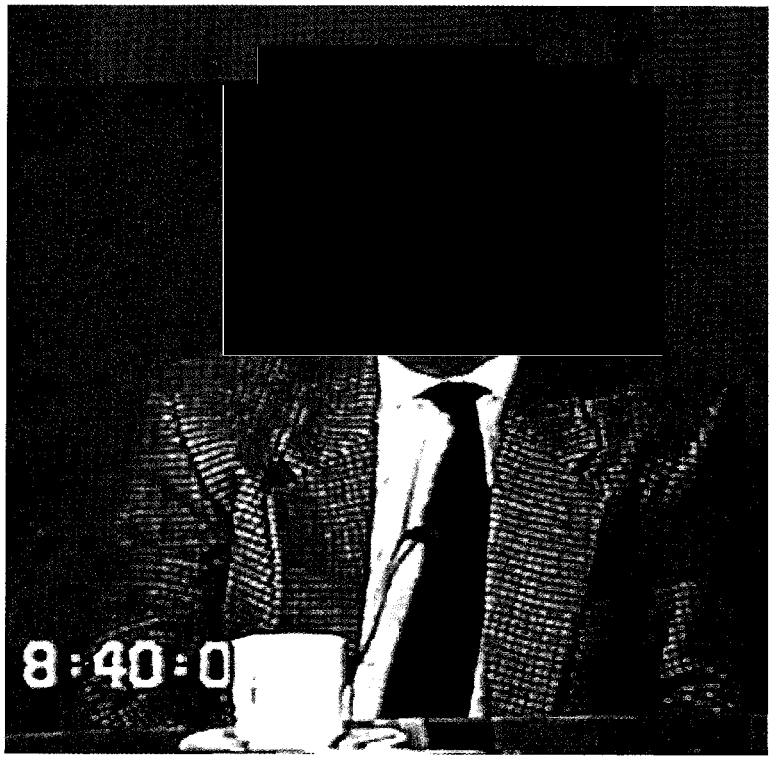
The woman who collided with the [redacted] Jeep in New Jersey had a momentary lapse of attentiveness. She faced charges and a criminal record.

The autopsy confirms that [redacted] survived the collision but died in a sequence of events straight from Hell.

FCA, the group that **owns the "fireball caused by the exploding Jeep,"** denied that *"the tank's on its own,"* asserts that *"the yellow piece of the car"* is crashworthy . . . and is free to enjoy life, limb, and luxury.

Related to Jeep crashworthiness is the person FCA calls "*The Father of the Jeeps.*" [J]

[redacted] was the Vice President of Jeep and (Dodge) Truck Engineering, JTE [K] I worked for Castaing for four years as an Engineering Programs Manager. I presented numerous technical and vehicle program reports directly to him. These reports included everything from diesel engine programs to Dodge truck engineering design, such as the N-Body [L]



Later Castaing became Executive Vice President of Engineering and the Product Executive directly responsible for all Jeep programs [M] In litigation involving a Jeep designed by Castaing, attorney Larry Coben examined his knowledge of Jeep crashworthiness:

Coben: What does the term crashworthiness mean in terms of design of a product?

Castaing: *I don't know. Tell me.*

Coben: You don't know the phrase?!

Castaing: *No.*

Coben: 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.*** [N]

The jury in the fire-death case of [redacted] noticed that the *"Father of the Jeep,"* the executive who was directly responsible for the original product plan and engineering design of the 1999 Jeep Grand Cherokee, failed to raise his right hand and defend *his* designs [O]

The Alternative Design : The 2005 WK-Body Jeep Grand Cherokee – Rejected in 1987

In fact, the only time that Castaing attempts to defend his Jeep crashworthiness is when compelled by subpoena. In the fire-death litigation of [redacted] Castaing's historical contribution to the Subject was put on the record by plaintiff attorney Courtney Morgan.

When deposed on June 14, 2012, Castaing testified on a proposal to revise the underlying engineering design of the Jeep Sport Utility Vehicles (SUV). A well-known and implicit aspect of the proposal (which specified a platform called the N-Body) included fuel tank location:

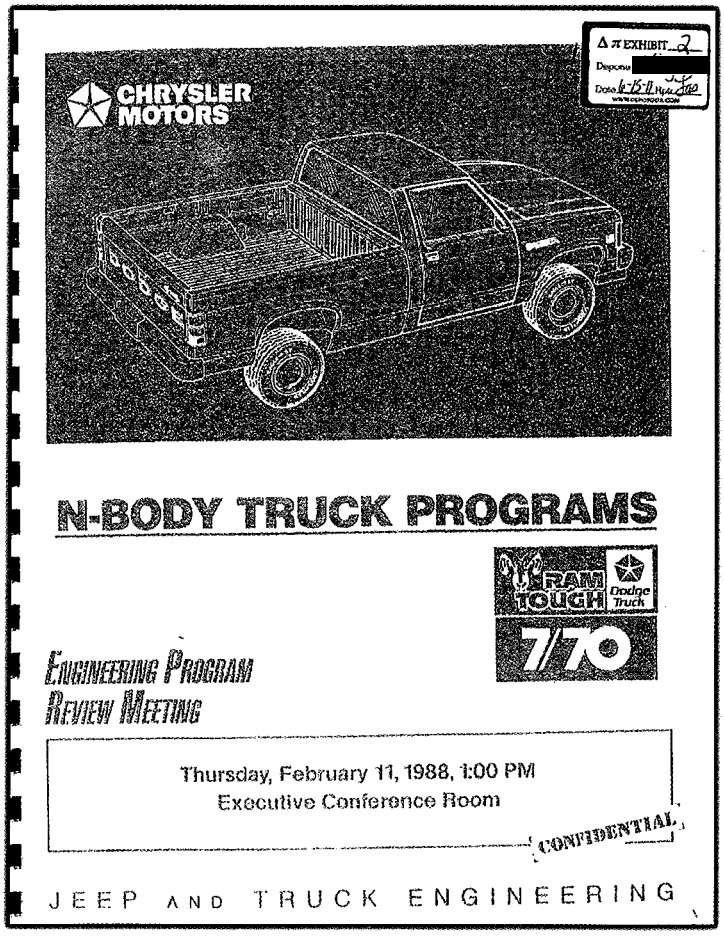
Morgan:	Now earlier, Mr. Castaing, you testified that the ZJ was mostly complete when the merger between AMC and Chrysler took place, and at that time, you learned that Chrysler was working on an SUV of their own, and Chrysler learned you were working on the ZJ, the Grand Cherokee. Have I got it right?
Castaing:	*Yes.*
Morgan:	And you said there was a delay and so forth. One thing I was a little unclear on. The Chrysler or the Dodge SUV, did it go forward, did it not go forward?
Castaing:	*It didn't.*
Morgan:	Okay. And do you know that that -- can you tell me, are you familiar with something called the N-body?
Castaing:	*Yeah, the N-body, I think, was the pickup truck, the small pickup truck for Chrysler.*
Morgan:	And was the N-body the basis of the SUV that Chrysler and Dodge were in the process of putting together when the two companies merged and then that got shelved?
Castaing:	*I think so. I'm not sure but I think so.*
Morgan:	Okay, okay. And can you tell me, sir, with respect to that Dodge SUV based on the N-body, where was the fuel tank anticipated to be mounted, if you know?
Castaing:	*No, I don't.*
Morgan:	Okay. Did you participate in meetings that led to the cancellation of the Dodge-based SUV and the elevation or the decision to do the Grand Cherokee?
Castaing:	*Yes.*

Castaing's claim of ignorance regarding the location of the N-Body fuel tank is tantamount to him claiming ignorance regarding the location of Europe.

In truth, he was fully aware that the mid-mounted fuel tank was a central benefit of the proposal to revise the underlying Jeep engineering design to the N-Body. I can assure you that Castaing was intimately involved in every aspect of the detailed discussions that threatened cancelation of ***his*** "ZJ-Body" These types of decisions involve the highest levels of corporate management.

Why am I certain of this truth? I was the Engineering Program Manager that formally proposed the N-Body design for the Jeep. I was assigned to the N-Body after *"the merger between AMC and Chrysler took place"* in 1987. As such, it was my job to advocate the N-Body design. P

The Alternative Design : The 2005 WK-Body Jeep Grand Cherokee – Rejected in 1987 - con't



Castaing, as head of JTE, was also aware-of and in receipt-of a Chrysler document that predated the N-Body by ten years. He was in-receipt of the document prior to his rejection of the proposal to revise the Jeep Grand Cherokee to the N-Body. Q

In my Press Release on [redacted], I detail how public release of the [redacted]**memo** occurred, and the abuse of trust that followed. R

The crashworthiness improvement of the mid-mount location of the N-Body fuel tank was consistent with the urgencies summarized by Mr. [redacted] in 1978. S

Not summarized is how this history relates to a 2005 Jeep vehicle that was NOT designed by FCA, is virtually indistinguishable from the N-Body regarding fuel tank location, and has a zero fire-death history.

Below the ENDNOTES you will find links to the 23 letters I have written regarding the 'Jeep Fuel Tank Crashworthiness Defect.' The Butler-Wooten firm, that adjudicated the recent $150,000,000.00 verdict in [redacted] vs FCA, received my letters.

After NHTSA commenced EA12-005, my letters were a resource for the plaintiffs, especially regarding the details of the 2005 Jeep Grand Cherokee, coded WK-Body, a design anticipated by the [redacted] Memo.

Prior to the $150,000,000.00 verdict in Georgia, FCA made the claim for media consumption:

"Chrysler moved the tank in 2005."

Chrysler did no such thing. The media also reported a Chrysler claim that they had *"moved the tank to make more room for luggage space."* A preposterous lie. In truth, what Chrysler pursued was outrageous, but characteristic of the incompetence and greed that led to the 'Jeep Fuel Tank Crashworthiness Defect.'

Rather than submitting to the basic physical realities which suggested that relocating the fuel tank should have commenced not later than 1993, Chrysler persisted in their ZJ architecture, pursuing a farce called *"the cage"* T I am not being picayune; these details are important and, as we will see, relate to perjurious testimony in the Kline litigation.

With my letters and the "cage" as context, Butler-Wooten attorneys requested all documents regarding the decision to relocate the fuel tank from the rear to mid-mount in the 2005 WK-Body Jeep Grand Cherokee. Astoundingly, FCA claimed they had no documents responsive to that discovery. Destruction of this type evidence, documents that would have confirmed the fuel tank location similarities between the 1987 N-Body program and the 2005 WK-Body, is by-itself a crime. U

Mercedes-Benz WK-Body : The Zero Fire-Deaths Architecture of "Midshipment" (sic)

Throughout the [redacted] litigation FCA witnesses testified that the decision on the fuel tank location was made by an internal group called "packaging," In this contrived scenario, we are supposed to believe that an as-yet unidentified draftsman made the crucial decision to locate the fuel tank in the rear. In my opinion, this ruse resulted in-part from defense lawyer coaching. But the fact is, this sputum is not a testimonial mistake or a misstatement: **it is perjury.**

After the illegal destruction of documents, that related to the decision to locate the 2005 Jeep fuel tank to mid-mount, FCA instead offered the Chief Engineer of the WK-Body, Mr. Philip Cousino. On January 23, 2015 Cousino was deposed by [redacted] family attorney Jeb Butler:

Butler: You're an engineer, right?

Cousino: I'm an engineer.

Butler: You were chief engineer for the Grand Cherokee with midships fuel tank, correct?

Cousino: I was the chief engineer of the program in March of 2003. I was not involved in the architecture of the vehicle, which would have happened in 2001 and probably a little bit in 2002. The architecture was -- the architecture of -- when a vehicle goes -- goes into production, it starts as an idea, it goes into prepackaging, it goes into a design office mode. Architecture is developed, the architecture is where do you place everything. Those things were already done -- done when I became chief engineer. In fact, we were already into a pilot build phase for the first vehicles.

Butler: So the first time you were a chief engineer for any Grand Cherokee was March or April of 2003, correct?

Cousino: Correct.

Butler: And at that time the decision had already been made to move the gas tank away from the rear and put it in the midships location, correct?

Cousino; The decision was made to put it in midship.

Butler: Is that right, is the answer yes?

*Cousino: At that moment we were -- we were part of Mercedes-Benz, our CEO and COO were involved in the design and architecture of that vehicle, and Mercedes had their fuel tanks at midship so they were instrumental and I assume -- I assume because they were involved -- that's who's involved in a design office architecture of the vehicle is fairly high levels of people at the company that because of their involvement and ownership of our company, they were instrumental in making it **midshipment** (sic), just as it was from Mercedes.*

Throughout his testimony, Mr. Cousino emphasizes a rudimentary and historically well-known fact of auto design: "Architecture" is a broad, overall vehicle design decision that is made by the highest levels of an auto company. This is consistent with the Francois Castaing testimony regarding his participation in the Chrysler executive management decision to retain the rear-mounted fuel tank on his ZJ-Body, while rejecting my 1987 proposal to base the then-new 1993 Jeep Grand Cherokee on the N-Body.

The sworn testimony of Mr. Cousino continues:

Butler: Oh, when you became chief engineer for the 2005 model year Grand Cherokee in March or April of 2003 the decision had already been made to move the gas tank away from the rear and put it in the midships location, correct?

Cousino: *If you're saying move as if it's the same vehicle, it was a brand-new vehicle, so from the design of the brand-new vehicle, it was designed in as a midship tank. It wasn't moved, it was designed that way. It's a brand-new architecture, brand-new vehicle, brand-new systems.*

Butler: Isn't it true that the 1999 Grand Cherokee had a gas tank at the rear?

Cousino: *Yes.*

Butler: Isn't it true that the 2005 model year Grand Cherokee had the gas tank midships?

Cousino: *Yes.*

Butler: All right. Now, you said in one of your answers previously that the architecture of the vehicle starts as an idea. Whose idea was it to put the gas tank in the midships location rather than at the rear?

Cousino: *I don't know. I think in talking to -- because I wasn't part of the program, I think in talking to the chassis engineering director, whose name is Denny Moothart, who is -- who is deceased, that he mentioned that Dieter Zetsche and Wolfgang Bernhard, who were the CEO and COO of the company, both from Mercedes, were involved in that decision.*

Butler: Do you know who made the decision?

Cousino: *No, I do not.*

Butler: But you did say in a prior answer that Mercedes-Benz was instrumental in moving the gas tank away from the rear; do you remember saying that?

Cousino: *Uh-huh. Oh, yes.*

Fundamental FCA Lie – Part One : ***"Ultra High Energy – Ultra High Speed Crash"***

Picture the following crash test realities:

A full size passenger vehicle collides into the rear of a Sport Utility Vehicle with a difference in speed of 70 miles per hour . . . but there are no fuel leaks, and there is no fire.

A full size passenger vehicle collides into the rear of a Sport Utility Vehicle with a difference in speed of 75 miles per hour . . . but there are no fuel leaks, and there is no fire.

A full size passenger vehicle collides into the rear of a full size passenger vehicle with a difference in speed approaching 80 miles per hour . . . but there are no fuel leaks, and there is no fire.

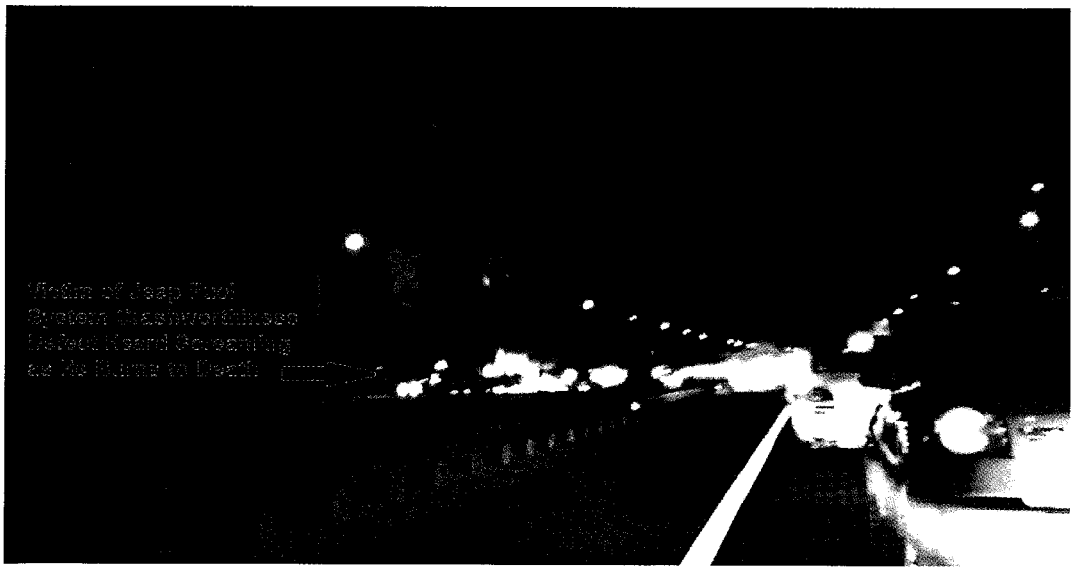
FCA is fully aware of these facts. Their claim that the primary victims in Jeep crashes were injured or killed as a result of an *"ultra high energy, ultra high speed crash"* is known by them to be fraudulent.

Defrauding the public regarding their safety & well-being, blatantly misleading them, relying on their (literal) ignorance and naiveté, is what constitutes just one of the crimes committed by FCA.

FCA and NHTSA/DOT continue to defraud the public; both are aware-of and in possession-of these and many other crash test facts. Both FCA and NHTSA/DOT are aware of the CAS webpage. [W]

FCA and NHTSA/DOT know that the defective Jeeps cannot sustain low energy, low speed crashes without placing the occupants at risk of fire-death or fire-injury. Both are aware of the Kenneth Smith case which occurred in 2001, and had a speed difference of only 25 miles per hour! They are aware that in each case discussed above, all of the primary direct victims survived the initial crash with no or little injury.

Let us emphasize the viciousness of the FCA lie relating to *"ultra high energy, ultra high speed crash."* I investigated the fire-death horror Orlando, Florida of November 16, 2011. I contacted the individual that filmed the following real-time video. It was immediately uploaded to my YouTube which is visited by FCA and NHTSA/DOT. In the next link @2:20, an eye and ear witness statement is exclaimed:



"Oh my God . . . I hear screaming."

[redacted]

FCA and their subordinates at NHTSA/DOT are fully aware that **a victim that has been killed upon impact, presuming an *"ultra high energy, ultra high speed crash,"* is not capable of screaming.** [X]

Fundamental FCA Lie – Part Two : ***"The Jeeps Meet or Exceed all Government Safety Standards and have an Excellent Safety Record "***

These most certainly do not, and at both levels. With this PR rhetoric, which also permeates their defense tactics, FCA is attempting to subvert the concept of auto safety to the legalistic, the bureaucratic; and worse, merely the statistical. The particular 'safety standard' in focus is FMVSS-301. The most succinct, lucid assessment of 301 comes from the Center for Auto Safety Director, Mr. Clarence Ditlow:

"Even the Pinto passed 301!"

Two years before their "Chicago deal" (reviewed below), NHTSA Administrator David Strickland and FCA Chairman Sergio Marchionne received letters that detail my approach as a former Chrysler safety manager. The "Chicago deal" participants have no such experience. Entitled *'Correct Statistical Approach to NHTSA Defect Investigation EA-12-005.,'* my letter states:

" As chairman of the Chrysler Safety Leadership Team (SLT), my priority involved Failure Mode Effects Analysis (FMEA) as the basis of preliminary and ongoing examination of a safety concern. In my role it did not matter that only one person may be affected during vehicle service life. What mattered was that a failure mode existed, and when provoked would cause serious harm.

Hypothetically, the fact that a vehicle service life was statistically "lucky," and a failure mode was provoked "only once," was not gala. Such an approach would merely confirm incompetence as a safety manager. For perspective, I have testified in litigation wherein defense counsel has deployed two themes:

1) "compliance with all government safety standards" and

2) various NHTSA statistics.

However, when the jury in [redacted] v Chrysler learned of the latter's foreknowledge that FMVSS-206 failed to address the failure mode that was responsible for the death of an 8-year-old boy, ***that standard and related NHTSA statistics were rendered legally and morally worthless.***

Similarly, when the jury in [redacted] v Chrysler learned that FMVSS-207 did not address ***the failure mode that was responsible for the death of an infant, that standard and related statistics were deemed irrelevant. "***

As FCA and NHTSA/DOT are fully aware, the primary 'failure mode' that is not addressed by FMVSS-301, in relation to the Jeep fuel system safety defect, is the underride collision. This rudimentary fact is central to the Subject, the manslaughter of Ms. [redacted] and her unborn son [redacted].

It is well-known to FCA/NHTSA/DOT that proclamations of complying with the minimums of a 'safety standard' may be effective when misleading the public or the courts, but such has only tentative connection to real world safety. Every jury that his heard my testimony on these points agrees. I can also assure you that the two executives pictured on Page 10 agree with me, hence their decision to implement the WK-Body for the 2005 Jeep Grand Cherokee, a vehicle that truly has *"an excellent safety record."*

To assert that a vehicle is *"in compliance,"* and enter that vehicle into the stream of commerce, when it is known that major revisions to vehicle configuration (e.g. SUV ride height), which were not anticipated or addressed by standards that are decades old, amounts to the crimes of gross criminal negligence and commercial fraud. The fact is, the United States Transportation Safety Act, as well as state-by-state commercial codes, require that when a unique FMEA is identified, it is the legal responsibility of the manufacturer to address it, prior to sale to the public.

Intermission : A Brief Summary of the Sections Above

1. The first time a jury was given the opportunity to review detailed facts about the 'Jeep fuel system crashworthiness defect' they assessed the offending/colliding driver with a fault of only 1%, while assessing that the FCA fault was 99%. The former has or will have a criminal record, the latter is free to enjoy, life, limb and luxury.

2. The victims of the 'Jeep fuel system crashworthiness defect' are two-fold: The primary victims are those horribly burned or horribly burned-to-death (and their families and friends). The secondary victim is the offending/colliding driver. Had these collisions involved an SUV other than the defective Jeeps, the legal outcome would have been restricted to bent fenders and traffic fines. It is the drama and horror (of removing burnt corpses from the Jeep) that motivates politically oriented public officials to prosecute criminal action against the 1% secondary victim, while turning a blind-eye to the 99% culprits.

3. Despite their PR and defense lawyer *"ultra-high energy, ultra-high speed crash"* rhetoric, FCA and NHTSA/DOT are both fully aware that in each case discussed above, and many others, all of the primary victims survived the initial crash with no or little injury; none of which were life threatening.

4. The FCA defense lawyer ruse that an unidentified draftsman in an internal group called "packaging" made the overall Jeep design architecture decisions, including the decision to locate its fuel tank in the rear-most position, is not a testimonial mistake or a misstatement: **it is perjury**. I can assure you that a FCA draftsman did not make the architecture decisions of the 1987 N-Body.

5. The safety management priority should be Failure Mode Effects Analysis (FMEA), not 'compliance with all government safety standards' or convolutions about 'NHTSA statistics.' What matters in the management of safety is that if a failure mode exists, and its provocation in the real world will have and effect of causing serious harm, then elimination of the failure mode is our duty.

6. Repeatedly when the layperson, such as the peers of a jury, learn that the auto industry has foreknowledge that a government safety standard fails to address a failure mode, that standard and related NHTSA statistics are rendered not merely irrelevant, but legally and morally vacuous.

7. Despite their PR and defense lawyer rhetoric, Chrysler *per se* did *NOT "move the Jeep fuel tank in 2005."* Consistent with corporate and product management practices, overall design decisions for the WK-Body were made at the highest levels of executive management, in this instance executive management at Daimler-Chrysler.

8. FCA and NHTSA/DOT are fully aware that since introduction in 2005, in rear-end collisions to the WK-Body Jeep Grand Cherokee, there have been zero fire deaths and zero fire injuries . . . because there have been zero fires . . . a statistic that would have prevailed earlier had the N-Body base been implemented as the 1993 Jeep Grand Cherokee.

9. Despite PR and defense lawyer ranting about *"ultra-high energy, ultra-high speed crash,"* FCA and NHTSA/DOT are fully aware of the CAS testing wherein the primary competition to the Jeep SUV (Ford Explorer, with a mid-mounted fuel tank) sustained impacts of 70 and 75 miles per hour with no fuel leaks and no fire.

10. FCA and NHTSA/DOT are fully aware of the Baker memo of 1978, and the portent of that widely-distributed document, which details the criteria that future fuel systems designs must include to improve crashworthiness; specifically warning of the dangers of rear mounted and unprotected fuel tanks.

Intermission : A Brief Summary of the Sections Above con't

11. FCA and NHTSA/DOT are fully aware that in the context of the [redacted] memo (and other criteria) that the undersigned, when acting as the Engineering Programs Manager for the Dodge Dakota, proposed that the engineering design of the 1993 Jeep Grand Cherokee be based on the N-Body. FCA and NHTSA/DOT are fully aware that the N-Body design had a mid-mounted fuel tank that has vastly superior crashworthiness versus the ZJ. The Chrysler executive decision to proceed with the ZJ prolonged the Jeep tradition of having a rear-mounted fuel tank; a location that is *"in the crush zone."*

12. What FCA, NHTSA/DOT and many plaintiffs may not have comprehended, is that if #11 had been endorsed, and the 1993 Jeep Grand Cherokee had utilized the N-Body engineering design, with its mid-mounted fuel tank, then all subsequent Jeep product variations, **such as the Jeep Liberty**, would have carried-forward this underlying mid-mount design. This is the exact Jeep design history that has occurred subsequent to the implementation of the 2005 WK-Body.

13. FCA, NHTSA/DOT and the Subject plaintiffs may not realize that if #11 had been endorsed, and the Jeep vehicles were revised to a mid-mounted fuel tank, similar to the N-Body, the Ford Explorer, or the 2005 WK-Body, then the 2003 Jeep Liberty that was driven by a 23-year-old expecting mother would have had a similar design . . . and she would have given birth to her son [redacted] . . . **rather than she and [redacted] being lowered into early graves in Michigan.**

14. Items 1 thru 13 all occurred prior to November 11, 2014. Knowledge of, and documentation of Items 1 thru 13 were in the possession of both FCA and NHTSA/DOT prior to November 11, 2014. Despite these facts, **FCA and NHTSA/DOT acted and did act in a manner that led directly to [redacted] and her son [redacted] being sanctified by two closed-coffin funerals.** The next sections detail this reality.

Criminal Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

This section requires at least two contexts:

1. We live in a society that has capitulated to "public service" that is predicated-on and restricted by the vile notion contained in the adage:

   "Too big to fail !"

   Although beyond the scope of the Subject, this adage was spewed by the same private/public condominium that later orchestrated "bankruptcy" for General Motors and Chrysler. This so-called bankruptcy included billions-of-dollars for a "bailout." So which is it?

   But the more insidious motivation of the bankruptcy/bailout ruse was Section 362. The bankruptcy court obviated, in blatant violation of the Constitution, the rights of the estate of [redacted] and many others. The 'Notice of Suggestion of Bankruptcy' facsimiles have time-stamps of mere minutes after the bankruptcy order was signed in New York. These events were not coincidental; in itself, these too comprised criminal conspiracy. So, while the Kline estate was told to *"pound sand,"* it was simultaneously told to fund the bailout! [Y]

   Relevant to the Subject, those individuals that orchestrated the closure of the NHTSA EA-12-005 did so in the context of *"Too big to fail!"* Their attitude (confirmed by the media, as well as the evidence in the Walden trial) is characterized by their deeds and words; that can do whatever they want, whenever they want, and there is nothing American society or state Attorneys General will do about it.

2. Pasted below is a section from Page 12 of my August 20, 2014 letter. It was copied to Acting NHTSA Administrator David Friedman, and DOT Secretary Anthony Fox. It was received three months prior to the manslaughter of Ms. [redacted] and her unborn son [redacted]:

Letters to NHTSA/CAS	Encapsulation	Skid Plate	Trailer Hitch
1 June 2010	0	7	0
9 February 2011	0	15	0
5 December 2011	1	2	0
27 August 2012	17	45	0
3 September 2012	0	1	0
24 September 2012	1	6	0
1 January 2013	1	3	0
12 February 2013	23	41	0

   Former NHTSA Administrator David Strickland, former DOT Secretary Raymond LaHood, FCA Chairman Sergio Marchionne, acting NHTSA Administrator Freidman and DOT Secretary Fox have never functioned as an auto industry safety manager.

   My table above depicts the frequency, in the four years of prior letters, that I advocated the notion that a "trailer hitch" is a crashworthiness device. I use quotation marks because, later, the conspirators had to publically admit that their "trailer hitch remedy" could not even tow!

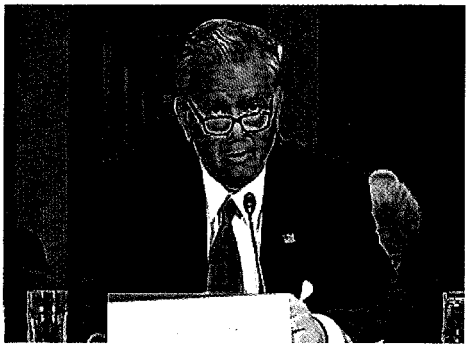
   This #2 includes the conspiratorial convolution that Strickland, LaHood and Marchionne agreed to, the not-so-subtle ploy that has come to be known as ***"Anything but Sheridan."***

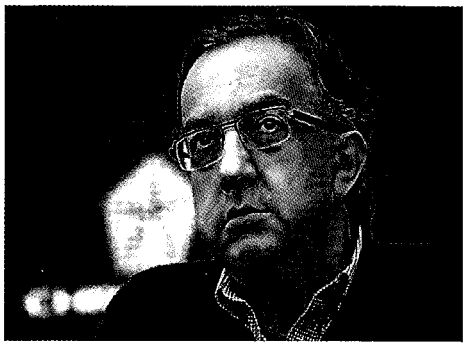
That is, if I had reported, testified, or stated in my letters or to the media that red wine was my remedy for the EA12-005 defects, then FCA and their subordinates at NHTSA/DOT would have declared green cheese . . .

Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" Fraud

A secret meeting was held on June 9, 2013, in a Chicago conference room between the following:

Former Transportation Secretary Ray LaHood
Former NHTSA Administrator David Strickland
FCA Chairman Sergio Marchionne [Z]





The petitioner which had requested the investigation of the Jeep fuel system crashworthiness defect, Center for Auto Safety, Director Clarence Ditlow, was not informed of the meeting, nor was he invited.

To understand that their pronounced "trailer hitch remedy" is not merely incompetent, but criminal, a perspective steeped in technical, historical and legal details is required.

The technical and legal perspective briefly discussed next provides the basis for the demand that the fire-death of Ms. [redacted] be investigated by your office, not as a civil matter, but as a crime; the crime of manslaughter:

A. On page 8 above, the [redacted] memo and how it was forwarded to NHTSA/DOT is discussed. Do you see the term "trailer hitch" anywhere in that 1978 document? [AA]

B. In 1985 Chrysler Engineering, prior to the purchase of American Motors' Jeep in 1987, published "FUEL SUPPLY SYSTEM DESIGN GUIDLEINES." It discusses at-length the designs implicit to fuel system crashworthiness. Do you see the term "trailer hitch" anywhere in that document? [BB]

C. In my first interview with the media in support of the CAS petition, I discuss the fire-death of Mrs. [redacted] In the following October 2009 report, do you hear me, or anyone else, present the notion that a "trailer hitch" is Jeep fuel system crashworthiness remedy?

[redacted]

Instead, you will repeatedly hear the terms "skid plate" and "encapsulate." [CC]

Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" MOPAR – con't

D. In my first letter supporting of the Petition, written on June 1, 2010, I copied Mr. Strickland. In addition to the [redacted] memo, I discuss "SAFETY RECALL A-10" of February 2002. Looking at Attachment 1 of my June 1, 2010 letter, note that Daimler-Chrysler declared that a "trailer hitch" was irrelevant to fixing a fuel tank crashworthiness issue! Note that not only does my cover letter emphasize the "skid plate" as a remedy, so does A-10! On the very first page the latter states:

> ***"Those vehicles that have been repaired by having a skid plate installed do not require additional service"***

In their A-10 letter to NHTSA of January 4, 2002, DaimlerChrysler stated:

> ***"It was established that development and validation testing of the On-Board Refueling Vapor Recovery (ORVR) system had been conducted in a vehicle configuration containing a fuel tank skid plate."***

Why? Because validation tests conducted with a trailer hitch COULD NOT AND DID NOT COMPLY.

Attached to the A-10 letter was a broadcast email to the Jeep dealership network:

> As an interim repair, dealers may replace the fuel tank brush guard with a skid plate. Due to the limited availability of skid plate assemblies, DEALERS ARE REQUESTED TO ORDER SKID PLATE P/N [redacted] TO REPAIR ONLY THOSE UNSOLD VEHICLES THAT HAVE A PROSPECTIVE RETAIL CUSTOMER. Additional skid plates will be available in the near future.

On that instructions page, DaimlerChrysler openly ignores the presence of the trailer hitch, since its presence is not, and never will be a crashworthiness defect remedy:

> 18. For vehicles equipped with a trailer hitch, loosen but do NOT remove, the two (2) rear-most trailer hitch bolts.
>
> 19. For vehicles equipped with a trailer hitch, use a pry bar (between brush guard and hitch) to flex the left upper leg of the brush guard inboard to allow it to pass below the trailer hitch.
>
> 20. For vehicles equipped with a trailer hitch, use a pry bar (between brush guard and hitch) to flex the right upper leg of the brush guard inboard to allow it to pass below

"SAFETY RECALL A-10" involves the WJ-Body version of the Jeep Grand Cherokee. This is the version that, while his mother and aunt looked-on in horror, burned 4-year-old [redacted] to death. At no time during the trial of [redacted] did the defense lawyers propose that if the [redacted] Jeep had a "trailer hitch" then [redacted] would be alive.

Detailed next, dropping the WJ-Body by NHTSA/DOT from the "trailer hitch" recall was a blatant fraud, a criminal act that was not premised on safety. It has been alleged that one priority included accommodation to their future employment FCA or employers who work in the latter's behalf. [DD]

Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" MOPAR – con't

E. The WJ-Body Jeep Grand Cherokee, that burned 4-year-old [redacted] to death, was not included in the June 9, 2013 "deal" between LaHood, Strickland and Marchionne. The reason is two-fold.

i. With accommodation prioritized in emails between them, it is not strident to presume that a NHTSA determination of *"not defective"* would accommodate the defense at the upcoming WJ-Body trial in Georgia. So does it surprise you to learn that an attempt was made by FCA lawyers to exclude the entire NHTSA/DOT investigation? [EE]

But, as if on-cue, a reimaging of that defense lawyer farce was attempted in the post-trial FCA press releases; the latter bold-facedly lied to the public [FF]

FCA US LLC Statement Regarding [redacted] v Chrysler Group Verdict:

April 2, 2015 , Auburn Hills, Mich. - FCA US is disappointed and will consider an appeal of this verdict. It is unfortunate that under Georgia Law the jury was prevented from taking into account extensive data submitted to NHTSA during a three year investigation, which included more than 20 years of rear impact accident data for tens of millions of vehicles. This and other information provided the basis for NHTSA's determination that the 1999 Jeep Grand Cherokee did not pose an unreasonable risk to motor vehicle safety.

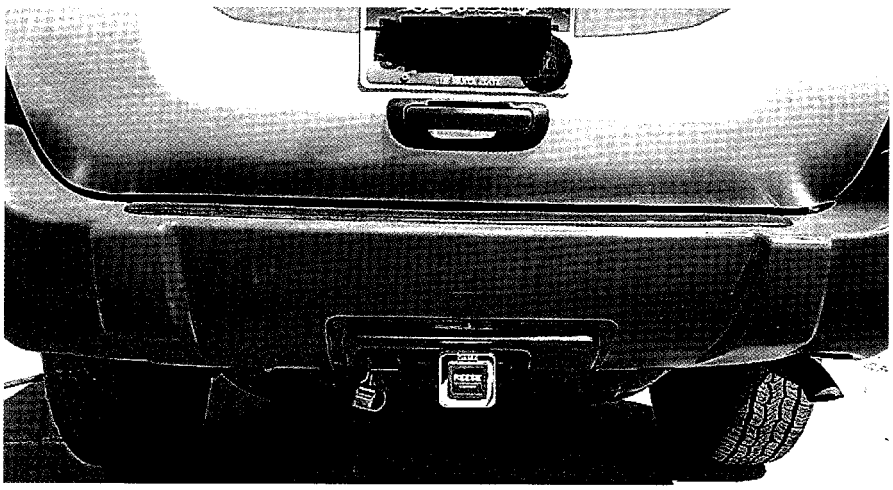
As FCA defense lawyers and PR staff are fully aware, it was FCA, not the plaintiff, that filed a motion to exclude all EA12-005 investigation evidence! The Court ruling states:

> **"Chrysler filed its motion in limine number 5 *'to exclude evidence of or reference to a NHTSA investigation of Jeep vehicles.'* "**

Not only did Chicago include NHTSA/DOT's pre-trial deletion of the [redacted] Jeep from the investigation, it also included agreeing to the fraud of "no defect" on that particular version. [GG]

ii. WJ-Body deletion from EA12-005 was accommodated because of the esoteric difficulties of a "trailer hitch" recall on this version of the Grand Cherokee. The prior 1993 thru 1998 ZJ-Body version is simple; the installation is cheap, oriented below the rear fascia, and a simple bolt-on.

Not so on the 1999 thru 2004 WJ-Body, which is far more expensive, in terms of the replacement parts involved, and how much labor time/cost would be consumed in the FCA dealership service bay :



Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" MOPAR – con't

F. As discussed in paragraph E, a major motivation of the NHTSA/DOT accommodation of FCA involved a joint pronouncement that the EA12-005 Jeeps were *"not defective."* To proceed with this fraud, members of the NHTSA Office of Defects Investigation (ODI), the group that had already determined that a defect existed, were left ignorant of the secret emails, and were purposely excluded from the meeting between LaHood, Strickland and Marchionne.

But on June 3, 2013, a mere five business days prior to the secret meeting in Chicago, ODI sent FCA a private 13-page letter which states:

"As discussed more fully below, ODI believes that the MY 1993 – 2004 Grand Cherokee and the 2002 – 2007 Jeep Liberty contain defects related to motor vehicle safety." [HH]

Note that ODI had NOT dropped the WJ-Body. On page 2 ODI specifically included the WJ-Bodyt:

> ODI's analysis revealed that the MY 2002- 2007 Jeep Liberty and the MY 1993-2004 Grand Cherokee performed poorly when compared to all but one of the MY 1993-2007 peer vehicles, particularly in terms of fatalities, fires without fatalities, and fuel leaks in rear end impacts and crashes.

And nowhere did ODI propose a "trailer hitch" as crashworthiness device. Like the Petitioner (CAS), ODI was informed after-the-fact that LaHood, Strickland and Marchionne had unilaterally declared that, for the first time in automotive history, that a "trailer hitch" was safety device, and that the only version that would fix the failure modes of the Jeep fuel system crashworthiness defect was the MOPAR version!

Further, and with no explanation whatsoever to CAS, ODI or the public, both the 1993-2001 XJ-Body Jeep Cherokee and the 1999-2004 Jeep Grand Cherokee, which were originally part of EA12-005, were mysteriously dropped by LaHood, Strickland and Marchionne. Does it surprise you that both of these vehicles were/are the focus of litigation? But matters only get more corrupt . . . and more deadly.

i. Four months before the manslaughter of Ms. [redacted] and her unborn son [redacted], and a full year after the conspiratorial closure of EA12-005, NHTSA Chief Counsel Mr. Kevin Vincent was compelled to send FCA the SPECIAL ORDER DIRECTED AT CHRYSLER GROUP LLC.

ii. Dated July 2, 2014, this SPECIAL ORDER reveals that the LaHood, Strickland and Marchionne "trailer hitch" remedy was baseless. The Special Order, not openly shared with the public, states:

"In response to ODIs concerns, Chrysler provided drawings of the hitches and a limited set of test data. In ODIs view the test data provided by Chrysler was insufficient. However, when asked, Chrysler indicated that it would not conduct any testing or supply more data."

The skimpy "test data" supplied to ODI was irrelevant, having nothing to do with crashworthiness. From a historical standpoint, how could it!? The trailer hitch had never been designed or used as a safety device. As indicated by Vincent, not only had FCA not done any testing of their "remedy," they refused to do any! Not only hadn't they done any testing with a MOPAR version, they hadn't and STILL have not done any crash testing with ANY brand of hitch. Later, the tax payer wound up doing it through ODI . . .

But relevant to the double manslaughter of November 11, 2014 . . . the LaHood-Strickland-Marchionne MOPAR "deal" **was technically baseless, morally and ethically vacuous, and legally it was fraud.** [II]

Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" MOPAR – con't

G. Aired on June 21, 2012, a full year before the secret Chicago meeting, my second media interview was filmed in Washington, DC, just up the street from Strickland's and LaHood's offices:

[redacted]

In this interview, which aired a year before the "deal," I referenced the crash tests I had witnessed and validated in behalf of the Petitioner:

"I'd like NHTSA to conduct their own crash tests." [JJ]

Do you hear anyone in that report promote the notion that a "trailer hitch" is a Jeep crashworthiness remedy? At the bottom of that webpage, do you see a link to a "trailer hitch" supplier?

H. Two months after my second media interview, on August 3, 2012, I was deposed in the Jeep fire-death litigation of [redacted]. How many times did the defense lawyer inquired about or propose the validity of a "trailer hitch" as a crashworthiness defect remedy? Never.

Alternatively, it was my expert opinion regarding "encapsulation" and "skid plate" that was examined extensively. My [redacted] deposition and Expert Report were forwarded to FCA and NHTSA/DOT. This led to *"Anything but Sheridan"* (See Page 15 above). Serreptiously, any NHTSA/DOT staff that accredits the plaintiff's expert is barred from future FCA employment consideration. [KK]

I. In the years leading up to the mediated, sealed settlement of the [redacted] litigation, which included numerous depositions of FCA experts and corporate witnesses, how many times do you suppose they proposed a "trailer hitch" as a Jeep crashworthiness defect remedy? For emphasis, let us review the [redacted] case deposition of June 14, 2011 of an FCA corporate witness, the *"Father of the Jeep"* Francois Castaing:

> ***" Okay. I said earlier, I'm going to repeat one more time, that the Jeep ZJ fuel tank was protected by the body around it. It was not -- let me finish, let me finish -- it was not protected by the tow package! "***

This testimony was known to LaHood, Strickland and Marchionne two full years before their fraud. [LL]

J. A full year prior to his capitulation, Mr. Strickland received my letter of August 27, 2012 wherein I review and rebut the fraudulent response statements made by FCA (See Item G above). I made the following simple and relevant request of Strickland:

> **"Please request from Chrysler Group LLC all 'high speed, high energy' impact tests that support their public allegations that 'a skid plate would have made no difference.'"**

I made this request fully aware that no such FCA testing occurred, and therefore their media statements were characteristically fraudulent. Consistent with his anticipated employment, Strickland never replied, or formally made the request. With this as partial context, let us ask:

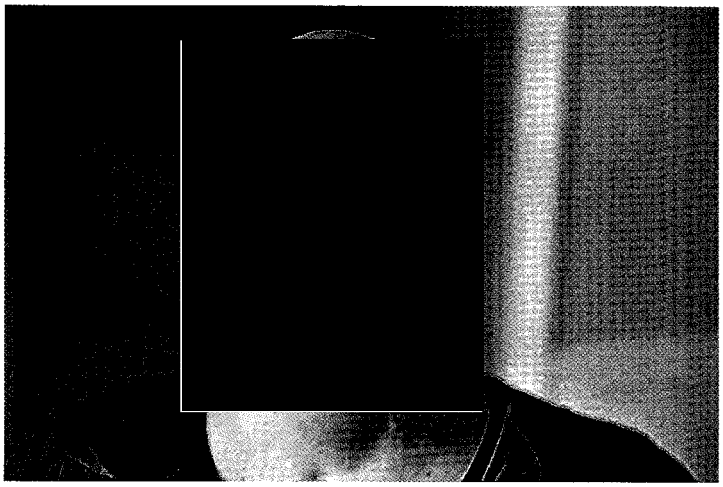
i. How many of the horrible fire-injury or fire-deaths occurred in Jeeps equipped with a skid plate?

ii. Alternatively, did any of the fire-injury or fire-deaths occur in Jeeps equipped with a "trailer hitch"? Of any brand?

iii. Central to the Conspiratorial Closure of NHTSA EA12-005, were NHTSA/DOT and FCA fully aware that the answer to Item ii above is a resounding 'Yes!" ?

Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" Fraud – con't

K. Page 3 above introduced you to [redacted]. Let us be reminded of her past, and her present:



As NHTSA/DOT and FCA are fully aware, the [redacted] litigation is pending. She was riding on an Indiana highway in January 2012, almost two years prior to the Chicago "deal" when her XJ-Body Jeep Cherokee was hit from behind and exploded into a conflagration that she could not escape.

The XJ was mysteriously dropped form EA12-005 by LaHood, Strickland and Marchionne. Later under proverbial marching orders dictated by that conspiratorial closure, the XJ deletion was justified by ODI because the ***"data for the Cherokee did not establish an unreasonable risk."***

In accommodation to their "deal," the datum that NHTSA's ODI conveniently omitted was that [redacted]eep Cherokee was known by them to have been equipped with a trailer hitch.

Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" Fraud – con't

L. Buried as "Confidential" in the EA12-005 file, and therefore obscured from public scrutiny, is the horrific fire-death case of 4-year-old [redacted]:

Obscuration of the [redacted] file was accommodated by NHTSA/DOT under the FCA ruse that it contained *"trade secret, proprietary and confidential information."* That claim is not a misstatement or a legal mistake, **it is a bold-faced lie**. There is nothing in the entire litigation, let-alone what comprised the redacted file forwarded to EA12-005, that even remotely sustains the rubbish that full disclosure:

> *". . . could enable a competitor to determine the kinds of analysis that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes."*

What was crucial was the fact that upon her fire-death on February 12, 2006, the trailer hitch, that was mounted to the 1993 Jeep Grand Cherokee she was riding in, could not and did not function as a "remedy." What was crucial, was that the public remain ignorant of the original lawsuit verbiage [MM] :

> s. In failing to provide adequate warnings concerning the rear structural crash performance of the vehicle when fitted with a trailer two hitch;
>
> t. In failing to design the vehicle in such a manner that the rear structure was crashworthy when fitted with a trailer hitch;

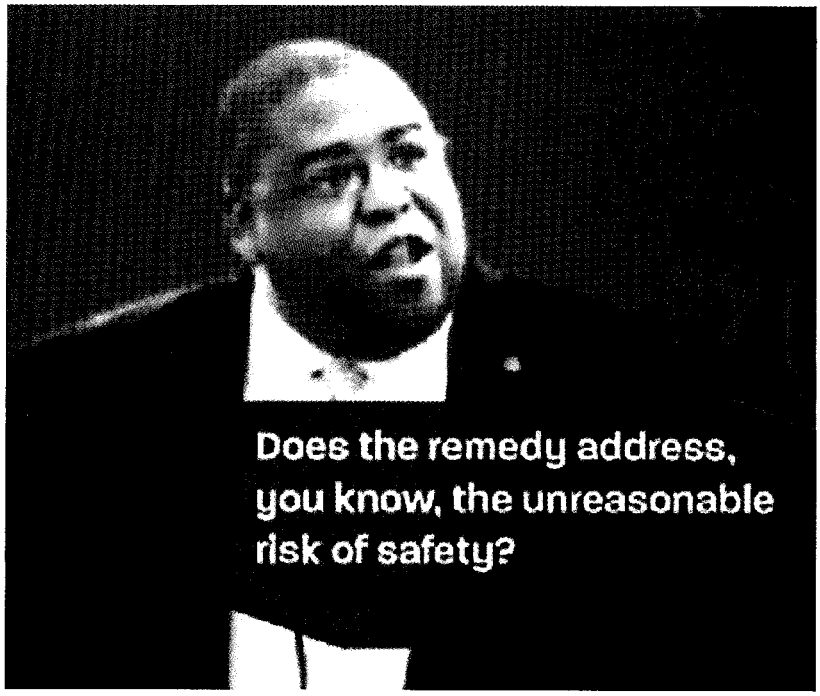
Of what possible value could this type of information have to a competitor . . . **other than the latter's ability to then *"benchmark"* how NOT to design an SUV fuel system?**

Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" MOPAR – con't

M. Ms. [redacted] her Dad and a young boy son were eye and ear witnesses to two fire-deaths in a 1998 Jeep Grand Cherokee. Ms. [redacted] Dad, Mr. [redacted] who saved the boy from the Jeep conflagration, later received the Carnegie Medal for bravery.

The surviving boy [redacted] watched as his mom [redacted] and his friend [redacted] screamed in agony, and then became silent . . . the only sound remaining were gasps from other witnesses, and the sounds of a burning Jeep and the smells of burning human flesh. [redacted] all survived the crash on October 12, 2012, about nine months prior to the secret Chicago "deal." NN

A few weeks after the LaHood-Strickland-Marchionne "trailer hitch" sham, Ms. [redacted] requested a meeting with NHTSA Administrator Strickland. Throughout the meeting of July 1, 2013 the participants questioned the validity of the "remedy." It was clear that Strickland could not answer his own rhetoric question:



Strickland never admitted the truth, that he and LaHood were fully aware that their capitulation to FCA was technically and empirically baseless. (I think he meant to exclaim, " . . . the unreasonable risk *to* safety.")

Key people attended. Mr. Lynn Grisham, the attorney for [redacted] the 4-year-old girl who burned to death in a trailer hitch equipped Jeep Grand Cherokee. [redacted], who burned horribly in a trailer hitch equipped Jeep Cherokee, and attorney Ines Murphy. Ms. [redacted] the attorney for [redacted] the death case that prompted the CAS petition. The petitioner, CAS Director Clarence Ditlow and former NHTSA Administrator Joan Claybrook attended. Unlike Chicago, ODI was invited and in attendance.

An excellent media report on the content of the July 1, 2013 meeting:
[redacted]

A transcript of Strickland's bureaucratic spectacle: [redacted]

The audio recording: [redacted]

A copy of Ms. [redacted] charity-benefactor book, "Dangerous Jeeps and Me," which discusses the horror of October 12, 2102 and the NHTSA meeting:

[redacted]

Conspiratorial Closure of NHTSA EA12-005 : The MOPAR "Trailer Hitch Remedy" MOPAR – con't

N. Even *"the eighty-two million dollar man"* could not anticipate the following buffoonery. OO

i. Prior to the $150,000,000.00 jury verdict in [redacted] vs FCA, lawyers for the former inserted into the plaintiff's case scores of Other Similar Incidents, OSIs, of Jeep fire-injury and Jeep fire-death incidents. FCA defense lawyers filed their routine objections to ALL the OSIs.

ii. Astoundingly FCA objected to the [redacted] fire-death OSI **on the specific basis that it had a trailer hitch!** FCA did not object that it was not the same version Jeep Grand Cherokee. The Jarmon Jeep was a ZJ. But the [redacted] Jeep was the WJ; the WJ that NHTSA/DOT had conveniently deleted from EA12-005 in accommodation to FCA. The order states:

14. Jarmon
   a. vehicle: 1993 Jeep Grand Cherokee
   b. date of incident: February 12, 2006
   c. notice: notice shown on March 20, 2007 (Plaintiffs' Ex. 507)
   d. notes: Chrysler argues that this OSI should be excluded because this Jeep had a trailer hitch, whereas the Jeep in which [redacted] was riding did not. Plaintiffs respond that the presence of a trailer hitch is not determinative with regard to substantial similarity, particularly because Chrysler has contended that a trailer hitch is the 'remedy' for certain rear-tank Jeeps—and therefore cannot validly contend that trailer hitches were the cause of failure. If Chrysler elects to argue to the jury that this OSI should be disregarded because of the presence of a trailer hitch, Chrysler is free to do so.
   e. ruling: Chrysler's objection to this evidence is:

____ OVERRULED
_✓_ SUSTAINED

In secret, NHTSA/DOT and FCA are *"Too big to fail !"* But if the forum is open court their primary defense routine is concealment, a tactic that infuriates even the most "conservative" juror. Noting page 18 above, contrary to their fraudulent post-verdict press release, it was FCA that moved to exclude EA-12-005. PP

If the [redacted] is admitted, then the plaintiff examines all the validation crash tests of the "trailer hitch remedy" **that never happened!**

If the [redacted] is admitted, then the Georgia jury hears that FCA and NHTSA/DOT knew, before their "deal," that in accidents where victims survive a trailer hitch equipped Jeep, **the hitch made no difference or even contributed to the fuel tank breach and the fire-death!**

If they allow the [redacted] then the jury discovers that the trailer hitch was known be ineffective on a ZJ version of the Jeep, and therefore will inquire about the basis of the NHTSA/DOT/FCA claim of "remedy."

If they allow the [redacted] then the jury will inquire about its absence on the WJ-Body version that burned Remington to death, and inquire why that version was conveniently deleted from the "investigation."

The underlying motivation for the FCA exclusion of ***any*** trailer hitch OSI was that the floodgates would open on the criminal fraud endemic to the entire conspiratorial closure of EA12-005.

Admittance of ***any*** trailer hitch OSI exposes, for example, that the FMEA that is not addressed by their "remedy," is the precise failure mode that led to the double manslaughter of November 11, 2014.

Conspiratorial Closure of NHTSA EA12-005 : Cover-up by the "Honorable" DOT Inspector General

The website of the Attorney General for Michigan would presumably address the Department of Transportation Inspector General as "Honorable." Let us review the validity of that presumption.

Two months prior to the double manslaughter of November 11, 2014, I wrote to DOT Inspector General Calvin L. Scovell, requesting his action on the following subject:

"Criminal Investigation of Fiat Chrysler Automobiles, and DOT-IG review of NHTSA EA12-005" [QQ]

The *"Too big to fail !"* response needs background . . . The CAS petition of October 2009 requested investigation of Jeep fuel system crashworthiness. It involved detailed safety data and concepts spanning decades, taking months to complete. The CAS follow-up has been voluminous. My assistance in support of the petition spans six years. However, Mr. [redacted]nade, what he called, an *"independent judgment"* regarding these complex matters in just a few days . . . pronouncing:

"We are unable to reply to further communications on this matter." [RR]

Two months after my letter of September 11, 2014 to Scovell the following live photograph was taken on Michigan's Lodge Freeway, just east of the northbound Telegraph Road exit in Southfield, Michigan:

The presumed use of the salutation "Honorable" by the website of the Attorney General for Michigan in reference to the current Department of Transportation Inspector General is, at the very least, questionable.

Criminal Investigation of those Responsible for the Manslaughter of Ms. [redacted]

For proper perspective we should note that the last name, of the young expecting mother in the coffin pictured above, is **not** any of the following:

Castaing	Viergutz	Eaton
Lutz	DeGraw	Friedman
Foxx	Obama	Lynch
Scovell	Holder	Jefferies
LaHood	Strickland	Marchionne
Elkann	Rosekind	Schuette

Excluding (for the moment) the final name in that list, it is routine for many to routinely describe what happened on November 11, 2014 as:

"an unfortunate statistic."

In the days that followed that date, as if on-cue, the public relations and defense lawyer rhetoric immediately commenced with fabrications associated with the following routine lie :

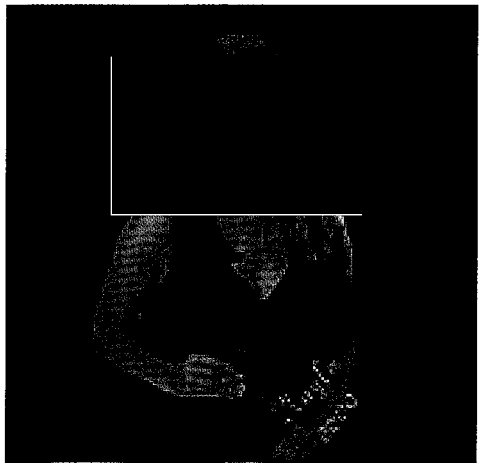
"Ultra High Energy – Ultra High Speed Crash"

And then, once again relying on the (literal) ignorance and naiveté of the taxpayer, FCA moved on to the following NHTSA Strawman endorsement:

"All Jeep vehicles meet or exceed all applicable Federal Safety standards, and have an excellent real world safety record . . . Our priority continues to be on designing vehicles that perform safely for our customers and their families in everyday driving conditions."

Again, it must be emphasized that, with the notable exception of the [redacted] vs FCA verdict of $150,000,000.00 on April 2, 2015, summary Items 1 thru 13 above occurred before November 11, 2014. But none of those items or the content of the [redacted] trial evidence were shared with Ms. [redacted]

In fact, the exact opposite was conveyed to her by both FCA, and the Jim Riehl's Friendly Chrysler Jeep dealership she had visited about the "trailer hitch recall." Not only was she told that her 2003 Jeep Liberty was safe for her *"family in everyday driving conditions,"* [redacted] was then told by the dealership that they did not have the (fraudulent) "trailer hitch remedy" parts anyway!



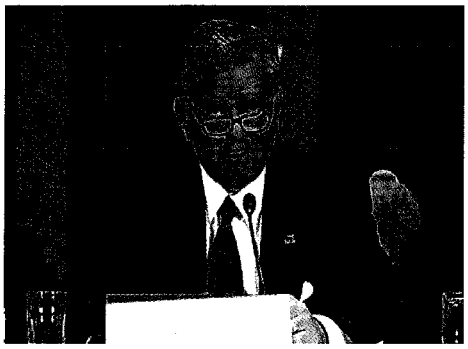
She should have been told NOT TO DRIVE THE JEEP UNTIL THE SAFETY DEFECT WAS TRULY FIXED. Despite acting responsibly, but in a state of naiveté, [redacted] unknowingly placed her safety & well-being in the hands of criminals.

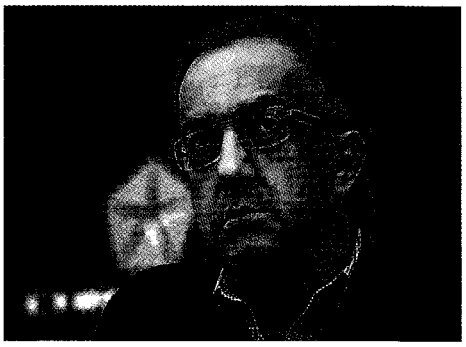
I am confident that if the expecting mother, pictured at left, who burned to death with her son on November 11, 2014, had any of the last names listed above, her information, her actions and her fate would have been otherwise.

Given the personalizing portent of your name being listed above, focusing on the vile *"unfortunate statistic"* routine, would such a conveyance to your daughter, of the type conveyed to [redacted] remain uninvestigated as a criminal matter?

Criminal Investigation of those Responsible for the Manslaughter of Ms. [redacted] con't

A mere four months **prior** to their "trailer hitch deal," **ALL THREE** pictured individuals received my letter of February 12, 2013:





I presented a **"Proposed EA-012 Recall Remedy."** Page 5 of that section had the following table:

Proposed EA-012 Recall Remedy – General Historical Incremental Piece Cost and Financial Summary

Based on the 4 February 1994 PPC approval data for the XJ-Body, the following financial data can be derived:

Tracked Vehicle Financial Category	4 Feb 1994 PPC Data	Factory or Dealership Incremental Cost: Fuel Tank Encapsulation	Incremental Cost of Fuel Tank Encapsulation as Percent of Category
Corporate Variable Cost	$ 9737	$50	0.5 %
Corporate Variable Margin	7644	$50	**0.6 %**
Wholesale Delivered Price (WSD)	$ 17381	$50	0.3 %
Dealership Margin (approx.)	5000	$100	2.0 %
Destination/Shipping Charge	465	n/a	n/a
Monroney Label MSRP (typical)	$ 22846	$100	0.4 %
Long-Term Customer Financial Effects Analysis			
Monthly Payment Assuming that Encapsulation Cost Absorbed by Chrysler	$515.84	Assumes full financing of MSRP at 4.0% for 48 Months	
Monthly Payment Assuming Pass-through of Encapsulation Cost ("cost recovery")	$516.97	Assumes MSRP increased by $50 Incremental Fuel Tank Encapsulation Cost to $22896.	
Increment to Monthly Payment	**$1.13**	n/a	**0.2 %**

Do you see "trailer hitch" anywhere? Do you note the phrase "Fuel Tank Encapsulation"?

The XJ-Body is similar to the KJ-Body Jeep Liberty in cost/pricing. The latter in my professional opinion is far more vulnerable to rear impact fuel tank breach and resulting fires. Even if you believe the farce that a "trailer hitch" would have saved Kayla and Braedin, that is NOT what she was told by FCA and the Jeep dealership. [redacted] was told that 1) she was driving a vehicle that was safe *"in everyday driving conditions,"* and that they (the dealership) did not have the part anyway. [redacted] *did* her public duty.

Given the personalizing portent of your name being listed above, focusing on the vile *"unfortunate statistic"* routine, would such a conveyance to your daughter, of the same type conveyed to [redacted] remain uninvestigated as a criminal matter? As a matter of your duty as the Attorney General for the State of Michigan?

Criminal Investigation of the Manslaughter of Ms. [redacted] - CONCLUSION

In my third media interview of July 2014 interview with WNDU-16 NBC News in Indiana. I stated concerns regarding the fraudulent recall and made a chilling prediction:

"No matter how small the probably of the fire death event is, Chrysler and NHTSA are deciding that the roll of dice is what constitutes safety, not the competent and urgent retrofitting of a competent remedy. So, the bottom line is, more deaths and more injuries are going to occur." [SS]

I will not now disclose my detailed knowledge and opinions about the accident in Southfield, Michigan, which occurred a mere four months after my prediction. I will share what the Oakland County Medical Examiner Coroner's Report states as the definitive cause of [redacted] death:

DATE PRONOUNCED: November 11, 2014 **TIME:** 5:10 p.m.

PLACE PRONOUNCED: Southfield

DATE OF AUTOPSY: November 12, 2014 **TIME:** 8:50 a.m.

CAUSE OF DEATH: THERMAL INJURY and SMOKE INHALATION

I can assure you that the phrase *"Ultra High Energy – Ultra High Speed Crash"* will not be found in the coroner's report or the accident report. Regarding the latter, consistent with the primary victim scenarios discussed above, the secondary victim of November 11, 2014 has been criminally indicted for his role in the accident: Further:

a. I am confident that the driver of the vehicle that collided with [redacted] Jeep Liberty will admit guilt and take responsibility for the accident.

b. I am confident that when a jury hears of Items 1 thru 13 above, and the additional facts surrounding November 11, 2014, that they will assess a guilt level for the driver of not more than 1%.

c. I am confident that FCA will not admit any guilt for the fire and will not take any responsibility for the manslaughter of Kayla and her unborn son [redacted].

d. I am confident that when a jury hears of Items 1 thru 13 above, and the additional facts surrounding November 11, 2014, that they will assess a guilt level for FCA of at least 99%.

My letter of February 12, 2015 to CAS makes the following dedication on page 1:

"Therefore, Subject 1 is now dedicated to the life that was taken from Ms. [redacted] and the ongoing agony that is being endured by her family, fiancé and friends."

Subject 1 is *"Criminal Investigation of DOT, NHTSA and FCA (Re: Closure of EA12-005)."* In that letter, and my previous letter of August 20, 2014, I list the definition of 'Gross Criminal Negligence':

"Gross negligence is culpable or criminal when accompanied by acts of commission or omission of a wanton or wilful nature, showing a reckless or indifferent disregard of the rights of others, under circumstances reasonably calculated to produce injury, or which make it not improbable that injury will be occasioned, and the offender knows, or is charged with the knowledge of, the probable result of his acts." [TT]

Criminal Investigation of the Manslaughter of Ms. [redacted] - CONCLUSION - con't

I am confident that when a grand jury is convened for the purposes of a criminal investigation of the deaths of [redacted], the members will assess that FCA and NHTSA/DOT acted in a manner that made it

" . . . not improbable that injury will be occasioned, and the offender knows, or is charged with the knowledge of, the probable result of his acts."

The members would recognize that [redacted] made an informed decision to continue driving her Jeep Liberty; but that is was based on information she received from FCA, NHTSA, DOT and Jim Riehl's Friendly Chrysler Jeep dealership, and that unknown to her that information amounted to commercial and criminal fraud, which led to the manslaughter of her and [redacted]

I am confident that members, noting that (civil) juries have assessed the minimum FCA guilt level at 99%, would decide that criminal indictments should be issued for at least the following individuals:

Francois Castaing	Sergio Marchionne	John Elkann
Raymond LaHood	David Strickland	Owen Viergutz
Anthony Foxx	David Friedman	Jim Riehl

It must be emphasized that we are dealing with organizations that are jointly guilty of decades of criminal activity. Indeed, the only hard copy attachments to this letter involve a two-page document that was authenticated by the highest levels of Chrysler Corporation. The effects of this closed-door conspiracy regarding NHTSA EA94-004 were exactly the same as NHTSA EA12-005 : Innocent, trusting individuals were both primary and secondary victims of manslaughter. Ironically, it was the Butler-Wooten firm, the firm that adjudicated the [redacted] verdict of $150,000,000.00, that relied on my testimony in the death case of Flax vs Chrysler (See box, page 12 above). In that 2004 litigation the jury rendered a verdict of $105,000,000.00 after hearing the following testimony, as published at Law.com [UU]

Sheridan said the committee also reviewed other safety complaints against minivans, which prompted an agreement involving Chrysler, the National Highway Traffic Safety Administration and the Justice Department. As part of that deal, Sheridan testified, NHTSA agreed that it would reject requests for information about minivan safety defects made under the federal Freedom of Information Act and Justice Department attorneys would defend NHTSA's refusal to release the requested material.

NHTSA's current general counsel, Jacqueline Glassman, formerly worked in the general counsel's office at Chrysler, Sheridan testifed. According to [redacted], NHTSA's former rulemaking chief, Barry Felrice, is now working at DaimlerChrysler.

Referencing the 'Public Integrity' tab of the Michigan Attorney General website, for decades 99% officials from FCA, NHTSA, DOT, and DOJ have blatantly failed *"the public's trust."* Please assume this letter offers your office the opportunity to assert the reverse in behalf Michigan citizens such as the 1% guilty ([redacted]) and the 0% guilty ([redacted]. [VV]

Please do not hesitate to contact me at any time. [WW]

Respectfully,

[redacted]

Attachments

Criminal Investigation of the Manslaughter of Ms. [redacted]

Endnotes

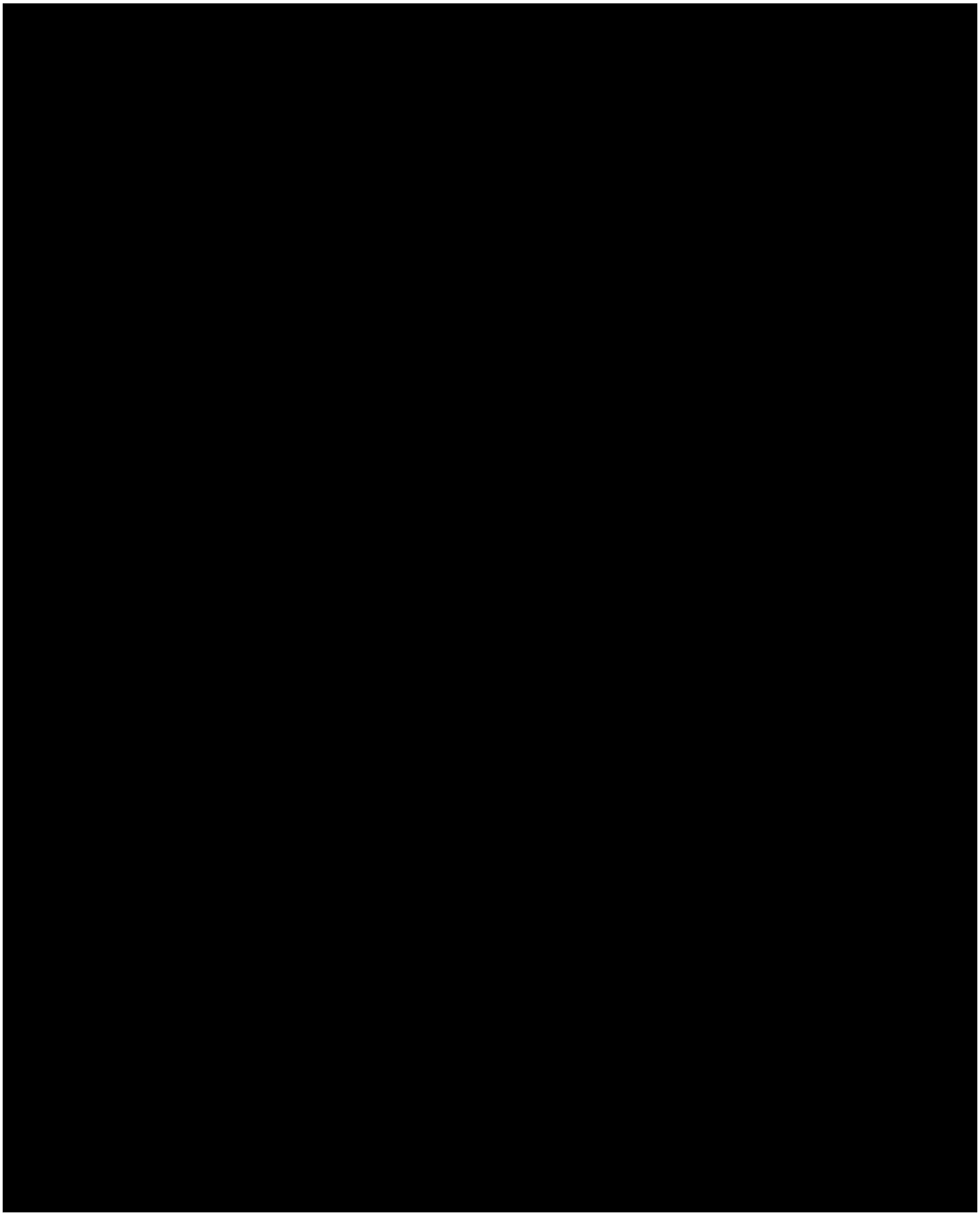
[A] The 'Public Integrity' tab of the Michigan Attorney General website:

[redacted]

[B] The Biography tab of the Michigan Attorney General website

[redacted]

"One was NHTSA's announcement that it was closing its contentious investigation of fuel tank fires in Chrysler Corp. SUVs, including its Jeep Grand Cherokees. The agency accepted the automaker's remedy of installing trailer hitches in more than 1.5 million vehicles to protect the tanks from rupture in rear-end collisions. **That's a solution that some safety advocates think may make the cars even more dangerous.** The other milestone was that it was the last day at work for David Strickland, the NHTSA administrator who had overseen the investigation and was leaving for a new job with Venable, a Washington law firm that lobbies for Chrysler."



[redacted]*letters, Jeep fuel tank crashworthiness defect investigation:*

[redacted]

ATTACHMENT 1

Attorney General Bill Schuette
G. Mennen Williams Building
7th Floor
525 W. Ottawa Street
Lansing, MI 48909
517- 373-1110

23 April 2015

Subject: Criminal Investigation of those Responsible for the Manslaughter of Ms. [redacted]

Reference: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

Five Pages

It must be emphasized that we are dealing with organizations that are jointly guilty of decades of criminal activity. Indeed, the only hard copy attachments to this letter involve a two-page document that was authenticated by the two highest levels of Chrysler Corporation:

1. Two page internal Chrysler Corporation document detailing NHTSA, DOJ and Chrysler conspiracy to block Freedom of Information Act (FOIA) requests to release taxpayer funded crash test videos and documents of what was referred to, at the time, as:

   "The deadliest defect involving children in auto safety history."
   Mr. Clarence Ditlow, Director, Center for Auto Safety, July 1995

2. Three page report at Law.com presenting the testimony of Safety Expert Paul V. Sheridan that led to the $105,000,000.00 jury verdict in the death case of an infant in Flax vs Chrysler.

[redacted]

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 [redacted] entiate the service campaign from a recall (mostly reflected in [redacted] rs) are as follows:

   - no admission of defect or safety pr[redacted]
   - stated purpose of the campa[redacted] in light of media coverage;
   - campaign does not count as a[redacted] in NHTSA recall numbers, no Part 573 or Par[redacted]
   - 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.

[redacted]

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 pa[redacted] minivan servicing (once replacement latches are available[redacted]
- Chrysler will submi[redacted] six quarter[redacted] ss of the campaign (helps to support defense of FC[redacted]
- NHTSA can make reference to t[redacted] gn in response to owner inquiries.

LAW.COM

Tenn. Jury Returns $105M Verdict Against DaimlerChrysler Over Minivan Seats

R. Robin McDonald
12-01-2004

A Tennessee jury has socked DaimlerChrysler Corp. for $105.5 million after finding that a baby's 2001 death was caused by a faulty minivan seat.

The Nov. 23 verdict in the Tennessee case, [redacted] *v. DaimlerChrysler*, No. 02C1288, (Tenn. 1st Cir., Nov. 23, 2004), is one of four product liability cases that Columbus, Ga., attorney James E. Butler Jr. has brought against DaimlerChrysler targeting minivan seat backs that collapsed during collisions, injuring or killing passengers.

Butler said DaimlerChrysler previously settled two of those cases confidentially with his clients. Another one is awaiting trial in Orlando, Fla.

The three-week trial in Nashville, Tenn., featured the testimony of a former DaimlerChrysler manager, who testified that the automaker knew the seats in its minivans were unsafe and colluded with a federal regulatory agency to cover up the information, according to [redacted] and co-counsel George W. Fryhofer III, both partners at [redacted], Wooten, Fryhofer, Daughtery & Crawford in Columbus and Atlanta.

Last week's verdict is one of at least a half-dozen big jury verdicts that [redacted] and his firm have secured in the past decade, many of them in vehicle product-liability cases. In two actions against General Motors Corp., [redacted] firm won $150 million in a 1996 SUV rollover case, and $105 million in a 1993 case where a pickup's side fuel tanks caused it to burst into flame after a collision.

In 1998, the firm won a $454 million verdict against Time Warner -- the largest civil verdict affirmed by the state appellate courts in Georgia's history -- on behalf of investors in Six Flags Over Georgia. In the suit, Six Flags investors accused Time Warner of skimping on capital investments, thereby lowering the park's market value and total worth.

DaimlerChrysler has vowed to appeal the Tennessee verdict, which includes $98 million in punitive damages, claiming that the crash that led to 8-month-old Joshua Flax's death was caused by a reckless driver, not a flaw in the design of the automaker's Dodge Grand Caravan. In a news release distributed in response to calls for comment about the case, DaimlerChrysler labeled the verdict "grossly excessive, unconstitutional, and a miscarriage of justice."

Cleveland, Ohio, attorney Lawrence A. Sutter of Sutter, O'Connell, Mannion & Farchione defended DaimlerChrysler. Sutter's office referred questions about the verdict to DaimlerChrysler's American headquarters in Auburn Hills, Mich.

CHRYSLER: DRIVER ALSO RESPONSIBLE

DaimlerChrysler spokesman Michael Aberlich said that during the compensatory damages portion of the trial, jurors found that the speeding driver of the car that rear-ended the minivan, [redacted], shared equal responsibility for the baby's death. "But when it came to punitives, the company bore the brunt of it," [redacted] said.

The Tennessee case went to trial because the baby's parents, [redacted] "were people of very strong convictions," explained [redacted].

"Even though they had an opportunity to settle the case, they wanted to get the word out about this defect and realized the only way to do that was through a jury verdict," [redacted] said. "They wanted to be sure no more parents had to watch their own kids killed or brain-damaged by these defects." [redacted] said he could not disclose the settlement offers Daimler-Chrysler made.

At the end of the trial's first phase, the jury awarded $5 million in compensatory damages for the baby's wrongful death and $2.5 million to the child's mother for negligent infliction of emotion distress caused by witnessing the infant's fatal injury and death.

During the punitive damages portion of the trial, the jury deliberated just two hours before awarding $98 million to the infant's parents. Butler said he had asked for $100 million in punitives.

CARMAKER ACCUSED OF COVER-UP

Throughout the trial, the plaintiffs' attorneys accused DaimlerChrysler of a cover-up of "hundreds of other similar incidents" of seat back collapses resulting in passenger injury or death while it continued to market its Chrysler Town and Country minivan, Plymouth Voyager, and Dodge Caravan as safe, family friendly vehicles. The automaker has sold more than seven million minivans.

The backward collapse of front seat backs in the minivans during rear-end collisions would propel the drivers and front-seat passengers backward in a rear-end collision, often causing their heads to collide with children riding in the middle seats, [redacted] said. That is what happened to 8-month-old [redacted] when a driver slammed into the back of the baby's grandparents' minivan at 70 mph in 2001 in Nashville, he said.

Five other passengers walked away from the accident with only minor injuries. But the front-seat passenger's seat back collapsed, throwing a family friend backward. He was not injured, but his head collided with the baby's skull, fracturing it, said [redacted], [redacted] died the following day. The baby was injured "only because the seat back collapsed on him," [redacted] said. "This has been a defect that has been brain-damaging and killing children in the family minivans for years."

"The horrible thing about these cases," said [redacted], "is that in almost every case, it's a parent whose head kills or maims his or her own child."

RECORDS SEALED

Testimony during the Tennessee trial revealed that the automaker has sealed court records of an undisclosed number of suits involving failed minivan seat backs. A former Chrysler employee who testified at trial said he is aware of eight other cases, in addition to [redacted], that DaimlerChrysler has settled confidentially.

[redacted] said the automaker was compelled in the [redacted] case to inform Tennessee Circuit Judge Hamilton Gaden of the total number of seat back failure cases the company has settled and the sums paid to plaintiffs in each case. But [redacted] said, over his and [redacted] objections, the judge allowed DaimlerChrysler to file that information under seal. The attorneys also said they were barred by the court from informing the jury or releasing that information to the public.

"I guess they don't want the public to know," [redacted] said.

But Chrysler spokesman [redacted] argued that the manner in which the Flax baby's skull was fractured was "a freak occurrence."

"This was a high-speed accident," he said. "Many things can happen in a high-speed accident. My understanding is that five people walked away. The irony, the real sad irony, is that one did not."

[redacted] argued during the trial that DaimlerChrysler "has known for over 20 years" that its minivan seats were "deadly dangerous" because of their tendency to collapse backward during a collision.

Testimony from experts at the trial, among them former Chrysler manager Paul V. Sheridan, showed that minivan seats collapsed in every rear impact test the automaker conducted.

"Notwithstanding the knowledge that the seat was collapsing in all of its internal rear crash tests, Chrysler was encouraging parents to put children behind the seats they knew would collapse," Fryhofer said.

In 1992, Sheridan was appointed to chair Chrysler's "Minivan Safety Leadership Team" to investigate minivan safety concerns. The leadership team concluded that the collapsing seatbacks needed to be redesigned, but Chrysler disbanded the team and destroyed the minutes of its meetings, according to Sheridan's testimony.

MANAGER LATER FIRED

Sheridan said he was fired a month later. By then, he said, he had informed his superiors that he intended to go to federal regulators with his safety concerns. Sheridan said Chrysler then sued him to prevent him from speaking about the company. Chrysler later withdrew the suit.

Sheridan said the committee also reviewed other safety complaints against minivans, which prompted an agreement involving Chrysler, the National Highway Traffic Safety Administration and the Justice Department. As part of that deal, Sheridan testified, NHTSA agreed that it would reject requests for information about minivan safety defects made under the federal Freedom of Information Act and Justice Department attorneys would defend NHTSA's refusal to release the requested material.

NHTSA's current general counsel, Jacqueline Glassman, formerly worked in the general counsel's office at Chrysler, Sheridan testifed. According to [redacted], NHTSA's former rulemaking chief, Barry Felrice, is now working at DaimlerChrysler.

Company spokesman Aberlich said he could not verify information about the employment of Glassman or Felrice.

But the Chrysler spokesman argued that the company's minivan seat standards "far exceed" NHTSA standards. The seats, he said, are designed to absorb the impact of a crash. In minivan seats, the impact of a crash is reduced by the seat back collapse, he argued. While the plaintiffs' lawyers argued that a stronger seat was safer, Aberlich continued, "There is not a universal agreement as to which is better" among auto industry engineers."

END OF DOCUMENT

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23 April 2015

Subject: Criminal Investigation of those Responsible for the Manslaughter of Ms. [redacted]

Reference: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect