

PE10-031

CHRYSLER

8/2/2012

ENCLOSURE 3
LAWSUITS

IN THE CIRCUIT COURT OF THE 18TH
JUDICIAL CIRCUIT IN AND FOR
SEMINOLE COUNTY, FLORIDA

CASE NO.:

[REDACTED]

Plaintiffs,

v.

CHRYSLER GROUP LLC, a foreign
Corporation and [REDACTED]
Defendants.

COMPLAINT

The Plaintiffs, [REDACTED]
of [REDACTED], sue the Defendants,
CHRYSLER GROUP LLC, a foreign corporation, and [REDACTED]
and state:

INTRODUCTORY ALLEGATIONS

1. This is an action for damages against Defendants in excess of Fifteen Thousand Dollars (\$15,000.00) exclusive of interest and costs.
2. At all times material hereto, Decedent, [REDACTED] was a resident of Davenport, Polk County, Florida.
3. At all times material hereto, [REDACTED] was a resident of Davenport, Polk County, Florida.
4. [REDACTED] has applied for and is anticipated to be issued Letters of

Administration for appointment as the Personal Representative of the Estate of [REDACTED]

5. All potential beneficiaries of a recovery for wrongful death and their relationship to the deceased are as follows:

a) The Estate of [REDACTED] as
Personal Representative of the Estate; and

b) [REDACTED] the minor daughter of the decedent,

6. Defendant, CHRYSLER GROUP, LLC (“CHRYSLER”), is a Delaware Corporation authorized to conduct business in the State of Florida, and regularly causes its products to be sold in Florida, specifically, Seminole County.

7. The Defendant, CHRYSLER, submitted itself to the jurisdiction of this Honorable Court by doing, personally or through its agents, at all times material to this cause of action, the following acts:

a) Committing a tortious act within this state by selling and delivering defective vehicles, including the subject vehicle which is the subject of this Complaint, to persons, firms, or corporations in this state via its distributors, dealers, wholesalers, and brokers. Such CHRYSLER vehicles were used by consumers in Florida in the ordinary course of commerce and trade;

b) Conducting and engaging in substantial business and other activities in Florida by selling and servicing CHRYSLER vehicles and component parts to persons, firms, or corporations in this state via its distributors, wholesalers, dealers, and brokers. Such CHRYSLER vehicles were used by consumers in Florida in the ordinary course of commerce and trade;

c) The acts or omissions of Defendant, CHRYSLER caused catastrophic injuries to persons in Florida, including Plaintiffs, [REDACTED]

At or about the time of said injuries, the Defendant engaged in solicitation

activities in Florida to purposefully promote the sale, consumption, and use of CHRYSLER vehicles, including the subject CHRYSLER vehicle which is the subject of this Complaint;

d) Selling CHRYSLER vehicles and component parts, including the subject CHRYSLER vehicle which is the subject of this Complaint, with knowledge or reason to foresee that their CHRYSLER vehicles would be shipped in interstate commerce and would reach the market of Florida users or consumers; and

e) Voluntarily qualifying to conduct business in this state by registering with the Florida Department of State and designating a resident agent for service of process in Florida at all times material to this action.

8. Defendant, [REDACTED] (hereinafter [REDACTED]), was at all times relevant hereto a resident of Altamonte Springs, Seminole County, Florida.

9. On or about November 16, 2011, [REDACTED] was operating a 1997 Jeep Grand Cherokee, VIN # 1J4FX68SXX [REDACTED] (hereinafter "Subject Vehicle"), which was owned by his girlfriend. The front seat passenger in the vehicle was his cousin, [REDACTED]

10. While stopped in traffic on Interstate 4 in Lake Mary, Seminole County, Florida, just east of the Lake Mary Boulevard exit, the Subject Vehicle was rear-ended by a 2002 Mercury Mountaineer being driven by Defendant, [REDACTED] and [REDACTED] suffered non-life threatening injuries in the impact and were both conscious and moving after the collision. Following the collision, however, the Subject Vehicle became engulfed in flames and [REDACTED] burned to death inside the vehicle and [REDACTED] suffered catastrophic physical injuries due to the fire.

COUNT I

STRICT LIABILITY OF CHRYSLER

11. Paragraphs 1 through 10 are hereby realleged.
12. Defendant, CHRYSLER, was engaged in the business of designing, manufacturing, constructing, selling, and distributing vehicles such as the Subject Vehicle to the public.
13. Defendant, CHRYSLER, placed the Subject Vehicle on the market with knowledge that it would be used without inspection for defects and dangers. The Defendant knew, or should have known, that ultimate users, operators, or passengers would not and could not properly inspect this product for defects and dangerous conditions, and that detection of such defects and dangers would be beyond the capabilities of such persons.
14. The Subject Vehicle was defective and unreasonably dangerous to ultimate users, operators, or passengers when sold and distributed by Defendant, CHRYSLER, because of design, and materials selection defects in the Subject Vehicle, including the following:
 - a) The Subject Vehicle was defective and unreasonably dangerous in that CHRYSLER placed the gas tank for the Subject Vehicle in an area where it hung below the bumper in an exposed position such that it was subject to foreseeable rear impacts and rupture;
 - b) The Subject Vehicle was defective and unreasonably dangerous in that CHRYSLER placed the gas tank in the area of the vehicle designed to crush and absorb impacts thus greatly increasing the likelihood of rupture, damage, dislocation, and fire in foreseeable rear impacts;
 - c) The Subject Vehicle was defective and unreasonably dangerous in that CHRYSLER designed the gas tank to be unshielded or otherwise protected in an area that was below the bumper, exposed, and within the designed crush zone for foreseeable rear impacts;
 - d) The Subject Vehicle was defective and unreasonably dangerous in that CHRYSLER used plastic for the gas tank as opposed to a more robust material, such as steel, so the fuel tank would be able to withstand

foreseeable rear impacts;

e) The Subject Vehicle was defective and unreasonably dangerous in that CHRYSLEER failed to incorporate safety designs for the fuel tank, such as skid shields, and instead represented them as only being necessary for off-road use;

f) The Subject Vehicle was defective and unreasonably dangerous in that CHRYSLEER failed to design the fuel neck filler to remain attached to the tank in the event of a collision, as opposed to pulling free from the tank such that the contents would spill and ignite; and

g) Failing to warn users, consumers, and ultimate passengers of the defective and unreasonably dangerous condition of the Subject Vehicle.

15. Specifically, Defendant CHRYSLEER had actual knowledge of the existence of the defects in the design of the fuel system and took steps to conceal its knowledge of these defects, as follows:

a) CHRYSLEER "Inter Office Correspondence" between CHRYSLEER's Manager of Automotive Safety, L. L. Baker, and the Director of International Product Development, R.M. Sinclair, dated August 24, 1978¹ (hereinafter "1978 Baker Memo") summarizes a discussion between multiple CHRYSLEER engineers and executives regarding fuel system design, which:

- i. States the importance of shielding fuel tanks and fuel systems from damage during rear collisions;
- ii. Recognizes that locating the fuel tank behind the rear axle of trucks offers less protection than the location ahead of the rear axle, making it especially susceptible to damage or dislocation in an impact;
- iii. States the need for a protective barrier in such designs; and
- iv. Likens the fire risk to that of the Ford Pinto, which was recalled just over two months prior to the date of the Memo for fire risk related to a defectively designed fuel system.

b) Despite pre-production acknowledgement by top executives and safety engineers within CHRYSLEER of the ramifications of this specific design flaw and the associated post-collision fire risks, CHRYSLEER still proceeded with placement of the plastic fuel tank in the vulnerable and largely unprotected position behind the rear axle in the Jeep Grand Cherokee with its first production model year vehicle,

¹ See [REDACTED] Memo attached as Exhibit "A."

starting in 1993;

- c) December 3, 1990 internal CHRYSLER Status Report, "Platform Engineering/Jeep Truck Engineering, 1992-1/2 Model Year ZJ Rear Impact Validation Test" indicates that rear impact tests performed to verify conformance to FMVSS 301 show that the vehicle did not meet the FMVSS 301 requirements because during testing, the fuel tank was punctured by a corner on the track bar² mounting bracket³;
- d) The "fix" was to put a shield on the bracket, however the Fuel System and Static Rollover Summary for Test No. 4472, a FMVSS 301 Compliance test performed for the model year ("MY") 1993, indicates that the point of contact on the front of the fuel tank during testing remained, in addition to one on the rear of the tank, and stated the tank was, "Contacted by track bar bracket left front corner. Contacted by differential housing on rear."⁴
- e) A second test on a pre-production MY 1993 Jeep Grand Cherokee, Test 4561, showed *five* different points of contact between the fuel tank and rigid components of the vehicle, specifically at the bumper, the track bar, the track bar bracket, the tailpipe and the axle. In addition, the left "J-hook," which holds the fuel tank in place, slipped out of slot.⁵
- f) These two tests, 4472 performed in 1991, and 4561 performed in 1992, were the two tests relied upon by CHRYSLER for FMVSS 301 Compliance of the 1993 MY, as well as for the MY 1996 vehicle, certified as compliant in July, 1995. Test 4561, however, was performed using a non-production model, a "C1 Pilot" which had a shorter tube connecting the transfer case with the rear axle than the one used in production, and 4472 test vehicle was equipped with a towing package, which included a U-shaped underbody bracket and crosspiece which reinforces the vehicle frame by increasing the structural rigidity, and assisted in achieving FMVSS 301 compliance. In short, both tests relied upon by CHRYSLER for the 1993-1996 MY vehicles utilized vehicles which were not representative of the standard production models for which compliance was certified and reported.⁶
- g) Prior to the certification of FMVSS 301 compliance, an actual production MY

² A "track bar" is part of the Jeep suspension system which bar connects to the frame and to the axle and is located forward of the rear bumper.

³ This memo was attached as Exhibit 4 to the May 26-27, 2005 deposition of [REDACTED] taken in the case of [REDACTED] Daimler CHRYSLER, Index No. 10215/00, Supreme Court of the State of New York, County of New

York, excerpts of which are attached hereto.

⁴ Deposition, P. 49:3-50:1, transcript excerpts are attached hereto as *Composite Exhibit B*.

⁵ Deposition, *Composite Exhibit B*, at P. 51:1-52:7.

⁶ Deposition, *Composite Exhibit B*, at P. 37:16-24; P. 38:1-39:-20, p. 40:16-42:13.

1996 Jeep Grand Cherokee had actually failed a FMVSS 301 compliance test, in a test conducted only four months prior to the July 1995 certification, as memorialized in a CHRYSLER internal memo dated March 2, 1995, entitled, "Safety Test, Vehicle Crash Test Request." In this test, ZJ8602, there was different crush damage to the rear of the vehicle than was reported in the non-production vehicles used in tests 4472 and 4561, described as "excessive" as well as noting excessive fuel leakage resulting.⁷

h) After certification of the MY 1996 compliance with FMVSS 301 by relying on tests 4472 and 4561, and having written off the ZJ8602 failure as an anomaly, the same manager of the Jeep Grand Cherokee test program that certified compliance then initiated changes to the frame rails and fuel system to improve rear impact testing for the MY 1997 vehicles.⁸

i) Starting with the 1997 model, CHRYSLER offered a brace that spanned between the rear frame rails. While CHRYSLER represented this as being offered to provide stiffness in the rear end, the fact is that the brace was meant to provide additional protection for the fuel tank. CHRYSLER also introduced a new fuel tank, vent line and fuel pump.⁹

j) On April 23, 1997, the Subject Vehicle, a standard production model, was manufactured by CHRYSLER. It was first registered as a corporate vehicle on May 15, 1997 and then was delivered to its first purchaser or lessee on or about June 16, 1997 as reflected by issuance of title to said first owner.¹⁰

k) As of introduction of the 1997 model, specifically including the Subject Vehicle, CHRYSLER had actual knowledge of the existence of the design defects in its Grand Cherokee fuel systems and non-compliance of the standard production models with Federal Motor Vehicle Safety Standard 301 for over four (4) years.

l) Thereafter, despite its actual knowledge, CHRYSLER continued to conceal its knowledge of such defects despite reports of real world injuries and deaths directly attributed to post-rear collision fires.

m) Such concealment also included the corporate decision-making by CHRYSLER to settle or resolve post collision fire related injury and death claims involving model year 1993-2004 Jeep Grand Cherokee after their introduction to the marketplace, and to require confidentiality agreements with respect to such settlements as entered into by CHRYSLER.

⁷ Deposition, *Composite Exhibit B*, at P. 57:2. Memo was attached as Exhibit 5 to [REDACTED] Deposition.

⁸ Deposition, *Composite Exhibit B*, at P. 53:19—54:23; P. 55:8-12.

⁹ Deposition, *Composite Exhibit B* at P. 109:6-111:9; and P. 54:13-23.

¹⁰ See CARFAX Report, attached hereto as *Exhibit C*.

n) In 2005, reportedly under pressure from its merger partner Daimler-Benz, CHRYSLER moved the fuel tank forward of the rear axle to the safer location used almost universally in light motor vehicles.¹¹

o) On October 2, 2009, the Center for Auto Safety (CAS) petitioned NHTSA to open a defect investigation and recall model year 1993-2004 Jeep Grand Cherokees. The CAS petition states in opening, that:

“Unlike the earlier Jeep Cherokee, the fuel tank of the Grand Cherokee is plastic and extends below the rear bumper so there is nothing to protect the tank from a direct hit in a rollover or by a vehicle with a low front profile or one lowered by pre-impact braking.

The design is so bad that CHRYSLER frequently settles lawsuits without extensive discovery and subject to confidentiality agreements. A search of NHTSA’s FARS files for fatal fire crashes where there was a fire occurrence in a 1993-2004 Jeep Grand Cherokee from calendar year 1992 through 2008 found 172 fatal fire crashes with 254 fatalities. With an additional known fatal fire crash in 2009, there have been at least 44 crashes with 64 fatalities where the Most Harmful Event is fire.

In comparison, NHTSA reported a total of 38 fire crashes involving only 26 fire deaths in the Ford Pinto when it issued its initial defect report in May 1978.”¹²

m) August 10, 2010, NHTSA opens its Preliminary Evaluation PE10-031 into fuel tank fire hazards in 3,037,000 1993-2004 Jeep Grand Cherokees and agrees to investigate further. The Office of Defect Investigation’s initial review neither supports nor excludes the possibility that a defect exists in the subject vehicles, though the ODI has always taken the position that vehicle fires pose a significant safety risk.¹³

n) On September 3, 2010, NHTSA sent Manufacturers Information Request to CHRYSLER related to the CAS petition and seeking information in ten different areas: 1) the number of affected vehicles; 2) number of related complaints, reports, claims and lawsuits received; 3) CHRYSLER’s vehicle and file information for such claims; 4) copies of all related documents; 5) a description of

¹¹ September 1, 2011 letter from Center for Auto Safety to CHRYSLER, at P. 2. See, attached as *Exhibit D*.

¹² CAS petition to NHTSA is attached as *Exhibit E*. Due to the length of the attachments thereto, only Attachments A & B are included in this filing.

¹³ NHTSA/Office of Defect Investigation website for PE 10-031 related to the Jeep Grand Cherokee MY 1993-2004 <http://www-odi.nhtsa.dot.gov>.

all studies and assessments of the problem; 6) all modifications made to address the problem; 7) copies of notices to dealers; 8) information on design variations; 9) information on any protective guard made for use with the subject vehicles by CHRYSLER; and 10) CHRYSLER's assessment of the alleged defect.

- o) In responding to the NHTSA inquiry, CHRYSLER submitted October 15, 2010 and November 12, 2010 responses then submitted an April 6, 2011 Power Point presentation to NHTSA on CHRYSLER's internal analysis of FARS (Fatality Analysis Reporting System) data and State data. This purported to show that the 1993-2004 Jeep Grand Cherokees are not outliers in fire-related crash injury and fatality. Accompanying the responses from CHRYSLER, however, were requests that certain information provided be afforded confidentiality, and be exempt from Freedom of Information Act inquiries. As such, there is no way to compare the information provided by CHRYSLER against industry standards for design and performance or other information which would permit objective review of the defect alleged by the CAS, NHTSA, or by Plaintiffs.

- p) It also appears that there are inconsistent and/or incomplete data sets presented in the information submitted to NHTSA. Specifically, CHRYSLER relies largely on FARS data in making its comparisons between its own vehicles' performance and that of peer vehicles. Since the initial investigation was opened, however, CAS reported to NHTSA that it independently located at least three (3) improperly coded Jeep Cherokee Fire deaths in the NHTSA database which it appears should have been contained in the FARS data. Two of these "un-coded" Jeep fire fatality incidents were known to CHRYSLER and included on a spreadsheet attachment which contained 23 responsive fire events, and which was provided in CHRYSLER's initial October 15, 2010 Response to NHTSA's inquiry for consumer complaints, lawsuits and reports (spreadsheet is docketed as: PE 10-031 INRD-PE10031-43424P¹⁴), but it is unknown whether the third was even accounted for.

Additionally, the "state data" which CHRYSLER presents in its Power Point analysis is limited to three (3) states, Illinois, Florida and North Carolina, but nothing is said of the other 47 states. It is unknown the number of responsive Cherokee fire events for these remaining 47 states which remain unrepresented in the data relied upon in CHRYSLER's analysis. Further, there are unexplained variations in the data presented to NHTSA in the Power Point in April 2011: CHRYSLER's second slide indicates that CHRYSLER's internal data reflects 26 "unique rear impact crashed that appear responsive to [NHTSA] investigation" however, in the graphic representations of the data later in the presentation (Slides

¹⁴ These docket entries are available on the NHTSA/Office of Defect Investigation website for PE 10-031 related to the Jeep Grand Cherokee MY 1993-2004 <http://www-odi.nhtsa.dot.gov>. The CHRYSLER presentation is docketed as INME-PE10031-46240 and the November 12, 2010 response as INRL-PE10031-43420P.

12 and 13), the number drops to 25. The spreadsheet that CHRYSLER had previously produced to NHTSA on October 15, 2010 (NRRD-PE10031-4342P), contains only 23 separate responsive fire incidents. All of these figures, however, differ from the numbers provided by CAS upon review of the scope of the Cherokee fire problem, which as of its petition to NHTSA was 44. Clearly, all of these figures cannot be accurate, yet there is no accounting for the variations. Accordingly, analysis is incomplete at best and misleading at worst.

q) Then on May 16, 2011, Karco, at the direction of CAS, performed a vehicle-to-vehicle 30 percent offset rear impact test for CAS, using a 1988 Ford Taurus as the bullet car and a 1996 Jeep Grand Cherokee as the target vehicle. After a foreseeable type impact at 40 mph, the plastic tank ruptured in two places.¹⁵

r) The NHTSA investigation remains ongoing in light of all of the foregoing which is contained in large part on NHTSA's website as documents accompanying the PE 10-031 investigation. In fact, the owner of the 1997 Jeep Grand Cherokee which was involved in the incident which is the subject of this lawsuit was contacted following the deadly fire for inclusion in the ongoing investigation. Data was gathered directly by the CAS for submission to NHTSA on this incident which is the subject of this suit and the vehicles involved were inspected within days of the incident.

s) To recap, at the time of the 1978 CHRYSLER Memo, not only were the specific fuel tank vulnerability problems and dangers recognized by engineers and executives, but they were discussed and outlined in detail, along with proposed solutions which were both technologically feasible and affordable.

t) This recognition occurred fifteen (15) years before the first Jeep Grand Cherokee went into production in the model year 1993, and almost two decades before the Subject Vehicle was on the market for its first retail sale in 1997. Eleven (11) more years went by before the subject accident of November 16, 2011. In total, CHRYSLER had thirty-three (33) years between CHRYSLER's own engineer's internal warnings documenting the fuel tank placement design defect and this same design defect causing injuries to [REDACTED] and the death of his cousin [REDACTED].

u) Despite the representations to NHTSA and to the public that the Grand Cherokee is safe and non-defective, from the date of the first production model Jeep Grand Cherokee in 1993 to the initiation of the NHTSA investigation in October, 2010

¹⁵ Full report available on the Center for Auto Safety website at the following address:
<http://www.autosafety.org/sites/default/files/TR-P31070-01-NC,%20Complete%20Report.pdf>

CHRYSLER reported knowledge of at least 23 fuel-tank related fire Jeep Grand Cherokee incidents which caused 41 injuries and 14 deaths.¹⁶

v) To date, CHRYSLER has taken no effort to repair, recall or otherwise notify owners or the general public about this unreasonably dangerous and defective fuel tank design and placement despite its knowledge of same.

w) CHRYSLER continues to misrepresent and conceal information related to the safety of the Jeep Grand Cherokee and its fuel system, placing the public at risk.

x) CHRYSLER has demonstrated a corporate policy of concealing fire dangers from the public.¹⁷

y) CHRYSLER has never voluntarily undertaken to notify owners or users of its 1993-2004 Jeep Grand Cherokee vehicles of the inherently dangerous condition of said vehicle due to the design and placement of its fuel tank despite its actual knowledge. Due to such concealment of such dangerous condition, the risks of same to users remains unknown to owners of the affected vehicles and to the general public.

z) In this case, neither the owner of the subject vehicle, nor Plaintiffs, [REDACTED] (deceased), were aware of the inherently dangerous condition of the vehicle in which they were traveling on the date of the subject crash, November 16, 2011, due to CHRYSLER's ongoing concealment of the defect.

16. As detailed above, CHRYSLER has known of this hazard since 1978 and has actively taken steps to conceal the presence of this defect since that time. CHRYSLER has knowingly relied upon non-production vehicles and those equipped with aftermarket equipment to claim compliance certification with mandatory certification testing requirements. CHRYSLER has actively represented that the rear brace for the 1997 Grand Cherokee was implemented for stiffness, to improve performance, rather than for the purpose of protecting the tank from crush

¹⁶ This was reported by CHRYSLER on "Enclosure 2" to CHRYSLER's response to NHTSA inquiry, dated October 15, 2010 attached as *Exhibit F*.

¹⁷ In addition to CHRYSLER's concealment of the fuel system design defects related to the Grand Cherokee fires, and subsequent confidential settlements as discussed herein, when CHRYSLER was informed about a fire involving a 2010 Jeep Wrangler fire, CHRYSLER reportedly offered to buy the Wrangler for an amount beyond the full sale value- in exchange for a non-disclosure agreement. The owner declined this offer. See article attached as *Exhibit G*.

damage which was a "benefit" that the engineer admitted in testimony that it actually offered. Even when NHTSA became involved, CHRYSLER submitted a report which it knew relied upon information which was incomplete, in that it fails to account for 47 of the 50 states' data and also appears to have excluded mis-coded fatal fire events identified by the CAS even after being advised of same, such that these incidents were not fully represented in CHRYSLER's presentation of data analysis to NHTSA in April, 2011. CHRYSLER's documents reveal that CHRYSLER repeatedly represented to NHTSA that the fuel tank placement was non-defective while at the same time settling lawsuits regarding this defect and insisting upon confidentiality agreements in the settlements so as to conceal this known danger from the public. Moreover, despite its knowledge, CHRYSLER has opposed any consumer notifications, warnings, recalls, service bulleting or other similar actions, thereby concealing the dangerous condition from the public. As such, accidents like this one continue to occur, causing otherwise preventable fire-related injuries and deaths.

17. Due to CHRYSLER'S failure to notify owners or the general public of the above mentioned defective and unreasonably dangerous condition, and due to its ongoing efforts to conceal the dangers from the public of which it knew:

- a) The owner of the Subject Vehicle did not know of the dangerous condition in the Subject Vehicle at the time of purchase;
- b) The owner of the Subject Vehicle did not know of the dangerous condition in the Subject Vehicle at any time during her use or ownership of the vehicle prior to the subject accident;
- c) Had the owner been informed at any time prior to or during her ownership

of the Subject Vehicle, she would not have purchased or continued driving the Subject Vehicle, and Plaintiffs would not have been exposed to the dangerous condition as described above; and

d) Plaintiffs did not know of the dangerous condition in the Subject Vehicle when borrowing the vehicle from the owner.

18. At the time of the accident, the Subject Vehicle was substantially unchanged from its condition, as set forth above, when sold and distributed by the Defendant, CHRYSLER.

19. For the reasons set forth above, the Subject Vehicle was unreasonably dangerous to foreseeable users, including [REDACTED], who were passengers in the Subject Vehicle in an ordinary and foreseeable manner. At the time CHRYSLER released the Subject Vehicle into the stream of commerce, non-defective designs were economically and technologically feasible and the use on the Subject Vehicle would have been a safer alternative design which would have significantly reduced the risk of Plaintiffs' injuries without substantially impairing the utility of the Subject Vehicle.

20. The defects described above directly and proximately caused the incident and injuries sustained by [REDACTED] in that they directly and in natural and continuous sequence produced or contributed substantially to [REDACTED] injuries and [REDACTED] death.

21. As a result of the death of [REDACTED] the Estate of [REDACTED] [REDACTED] has suffered damages including medical or funeral expenses due to his death which have become a charge against his Estate or that were paid on behalf of the Decedent; and [REDACTED] his daughter, has lost the companionship of her father and has

suffered damages, including loss of support and service, loss of parental consortium, mental pain and suffering, and all other damages as allowed by Florida Statutes Sec. 768.21.

22. As a result of the accident, [REDACTED] has suffered permanent injuries which will continue on into the future; past wage loss, future wage loss, diminished capacity to earn a living, past and future medical expenses, pain and suffering, inconvenience, disability, loss of enjoyment of life, and past and future medical care and treatment.

WHEREFORE, the Plaintiffs, demand judgment against Defendant, CHRYSLER, for compensatory damages, costs, and interest, and for such other relief as the Court deems just and demands a trial by jury on all issues as a matter of right.

COUNT II

NEGLIGENCE OF CHRYSLER

23. Paragraphs 1 through 10 are hereby realleged.

24. Defendant, CHRYSLER, was under a duty to properly and adequately design, manufacture, assemble, test, inspect, label, provide adequate warnings for, distribute, and sell the Subject Vehicle in a reasonably safe condition so as not to present a danger to members of the general public who under ordinary circumstances would come into contact with the Subject Vehicle, including [REDACTED]

25. Defendant, CHRYSLER, breached its duty by selling the Subject Vehicle with the knowledge of the conditions listed below and that the ability to perceive and recognize the existence of these dangerous conditions was outside the capacity of an ordinary consumer such that the Subject Vehicle when sold was not in a reasonably safe condition for foreseeable use, as follows:

- a). The Subject Vehicle was negligently designed in that CHRYSLER placed gas tank for the Subject Vehicle in an area where it hung below the bumper in an exposed position such that it was subject to foreseeable rear impacts and rupture;
- b). The Subject Vehicle was negligently designed in that CHRYSLER placed the gas tank in the area of the vehicle designed to crush and absorb impacts thus greatly increasing the likelihood of rupture and fire in foreseeable rear impacts;
- c). The Subject Vehicle was negligently designed in that CHRYSLER designed the gas tank to be unshielded in an area that was below the bumper and exposed as well as being within the designed crush zone for foreseeable rear impacts;
- d). The Subject Vehicle was negligently designed in that CHRYSLER used plastic for the gas tank as opposed to a more robust material, such as steel, so the fuel tank would be able to withstand foreseeable rear impacts;
- e). The Subject Vehicle was negligently designed in that CHRYSLER failed to incorporate safety designs, such as skid shields, and instead represented them as only being necessary for off-road use;
- f). The Subject Vehicle was negligently designed in that CHRYSLER failed to design the fuel neck filler to remain attached to the tank as opposed to pulling free from the tank such that the contents would spill and ignite ; and
- g). Negligently failing to warn users, consumers, and ultimate passengers of the Subject Vehicle of the unreasonably dangerous conditions listed above which CHRYSLER knew of at the time of the design and sale of the Subject Vehicle.
26. Paragraph 15 – 17 and all subparts are hereby realleged as if re-stated here in full.
27. The negligence described above directly and proximately caused the fire incident and death of [REDACTED] and the injuries to [REDACTED] in that it directly and in natural and continuous sequence, produced or contributed substantially to [REDACTED]'s death and [REDACTED] injuries.
28. As a result of the death of [REDACTED] the Estate of [REDACTED]

██████████ has suffered damages including medical or funeral expenses due to his death which have become a charge against his Estate or that were paid on behalf of the Decedent; and ██████████ his daughter, has lost the companionship of her father and has suffered damages, including loss of support and service, loss of parental consortium, mental pain and suffering, and all other damages as allowed by Florida Statutes Sec. 768.21.

29. As a result of the accident, ██████████ has suffered permanent injuries which will continue on into the future; past wage loss, future wage loss, diminished capacity to earn a living, past and future medical expenses, pain and suffering, inconvenience, disability, loss of enjoyment of life, and past and future medical care and treatment.

WHEREFORE, the Plaintiffs demand judgment against Defendant, CHRYSLER, for compensatory damages, costs, and interest, and for such other relief as the Court deems just and demands a trial by jury on all issues as a matter of right.

COUNT III
NEGLIGENCE OF ██████████

30. Paragraphs 1 through 5 and 8 through 10 are hereby realleged.

31. Defendant ██████████ owed a duty to the motoring public, including specifically the Plaintiffs to operate his vehicle in a reasonably safe manner.

32. Defendant ██████████ breached the duty owed Plaintiffs by failing to keep reasonable distance and failing to stop his vehicle for slowing/stopped traffic and instead rear-ended the Subject Vehicle.

33. The negligence described above directly and proximately caused the incident that led to a post-rear collision fire and death of ██████████ and the injuries to ██████████ in that it directly and in natural and continuous sequence, produced

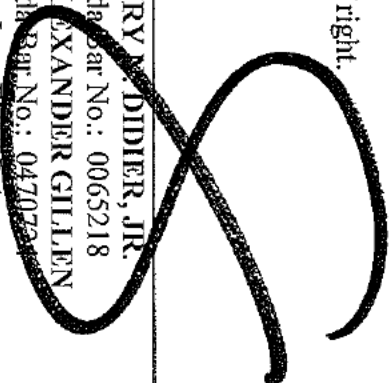
or contributed substantially to [REDACTED]'s death and [REDACTED] injuries.

34. As a result of the death of [REDACTED], the Estate of [REDACTED] has suffered damages including medical or funeral expenses due to his death which have become a charge against his Estate or that were paid on behalf of the Decedent; and [REDACTED] his daughter, has lost the companionship of her father and has suffered damages, including loss of support and service, loss of parental consortium, mental pain and suffering, and all other damages as allowed by Florida Statutes Sec. 768.21.

35. As a result of the accident, [REDACTED] has suffered permanent injuries which will continue on into the future; past wage loss, future wage loss, diminished capacity to earn a living, past and future medical expenses, pain and suffering, inconvenience, disability, loss of enjoyment of life, and past and future medical care and treatment.

WHEREFORE, the Plaintiffs, demand judgment against Defendant, [REDACTED], for compensatory damages, costs, and interest, and for such other relief as the Court deems just and demands a trial by jury on all issues as a matter of right.

DATED this 24th day of April, 2011,


HENRY N. DIDIER, JR.
Florida Bar No.: 0065218
P. ALEXANDER GILLEN
Florida Bar No.: 047072
Didier Law Firm, P.A.
1203 North Orange Avenue
Orlando, Florida 32804
Telephone: 407.895.3401
Facsimile: 407.895.3408
Attorneys for Plaintiff

CONFIDENTIAL
Inter Company Correspondence

File Case 239
August 24, 1978

<u>Division</u> R. M. Sinclair, Director International Product Development	<u>Division</u> Product Plan, Chrysler & Design Office Center
<u>Plant/Office</u> L. L. Baker, Manager Automotive Safety	<u>Plant/Office</u> Engineering Chrysler Office Center

[REDACTED]

Subject: Fuel System Design - Chrysler Passenger Cars And Trucks.

Pursuant to the discussions between Messrs. [REDACTED] and yourself with Mr. [REDACTED] on August 22, the fuel system design for domestic passenger cars and trucks is summarized for Mr. [REDACTED] information.

Not only are the impact performance requirements of WSSS-301 pertinent to the design approach but the significant increase in the last few years in the numbers of product liability cases involving fuel system fires and the increase in the size of the awards by sympathetic juries has to be recognized. In the Ford Pinto case the NHTSA Office of Defects Investigation selected arbitrary performance criteria of minimal or no fuel leakage when the test car is impacted in the rear by a full size car at 35 mph as a basis for questioning the safety of a recall modification of the Pinto.

. Passenger Car

Fuel Tank Location

The front wheel drive configuration in Chrysler's Omni and Horizon allowed the fuel tank to be located beneath the rear seat. This location provides the protection of all of the structure behind the rear wheels--as well as the rear wheels themselves--to protect the tank from being damaged in a collision. This same location will be used in the new 1981 K-Body cars which will also have a front wheel drive.

The rear wheel drive H-Body scheduled for introduction in 1983 will have the fuel tank located over the rear axle and beneath the floor pan.

The question of whether M, R or J-Body cars should be converted to tank over axle prior to their phase-out is a matter under intensive study at this time.

Filler Neck And Cap

As the fuel tank is moved to a more forward location, the fuel fill is moved to the side of the car. The fuel cap will be recessed below the body surface and a fuel fill door provided. The fuel filler neck is designed to break away from the car body with the fuel filler cap still in place.

In this design the filler cap and fill neck or fill tube remain with the tank to avoid separation and possible fuel leakage. This side fill is scheduled for J and M-Bodies in 1980 and the Y-car in 1981.

PLAINTIFFS
EXHIBIT

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The fuel fill is less likely to be damaged in a sideswipe when located on the right side of the car. As new models are introduced, the fuel fill will be moved to the right side of the vehicle. This may also offer greater protection to drivers who run out of gasoline on the highway, since they will fill the tank on the side away from the traffic.

Structure

In 1979 through 1983, the M, R, and J model cars which have the fuel tank under the floor pan behind the rear wheels, structural reinforcement of the longitudinal rails on each side of the tank, shielding of any unfriendly surfaces adjacent to the tank, and the design of straps and hangers to limit undesired tank movement will be employed.

Truck

Fuel Tank Location

The same principles regarding fuel tank location apply to truck design. It is important that these larger fuel tanks are not only shielded from damage in a collision but do not break away from the truck and thereby spread fuel onto the roadway. The approach used by Mitsubishi on the SP-27 of locating the fuel tank ahead of the rear wheels appears to provide good protection for the tank.

The front wheel drive 'T-115 to be introduced in 1982 will have the fuel tank ahead of the rear wheels and under the rear seat. However, in rear wheel drive trucks there is no clearance over the axle for fuel tank installation and in many cases there is insufficient space ahead of the axle for fuel tanks of the desired capacity.

Chrysler is investigating fuel tank relocation ahead of the rear wheels for vans and multi-purpose vehicles, but present plans for pickups through 1983 and for MPV's and vans through 1985 have the fuel tank located behind the rear wheels. In vehicles both with and without bumpers there is a concern with vertical height differences that create a mismatch with passenger car bumpers. Where fuel tank location behind the rear axle is all that is feasible, a protective impact deflection structure may have to be provided whether or not a bumper is provided. An investigation whether to relocate the fuel tank or to provide impact deflecting structures is presently underway.

Fill Neck And Gap

All trucks and vans have side fill. The sweepline pickup truck (DW 1-3) and multi-purpose vehicles (AD-1 & AW-1) will have a recessed fill cap and fuel filler door beginning in 1981.


L. L. Baker

1 SUPREME COURT OF THE STATE OF NEW YORK
2 COUNTY OF NEW YORK

3 [REDACTED]
4 [REDACTED]
5 plaintiffs,

6 -against- Index No. 10215/00
7 Volume I

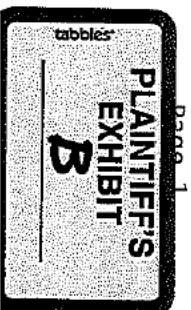
8 DAIMLERCHRYSLER CORPORATION,
9 WESBURY JEEP EAGLE, INC.,
10 MARIBEL ORTIZ, AS INTENDED
11 ADMINISTRATRIX OF THE ESTATE
12 OF [REDACTED] DECEASED,
13 [REDACTED]
14 Defendants.

15 The videotaped deposition of [REDACTED]
16 [REDACTED], a witness in the above-entitled matter,
17 taken before [REDACTED], a Notary
18 Public, at 840 West Long Lake, Suite 200, Troy,
19 Michigan, on May 26, 2005, commencing at or about
20 1:58 p.m.

21 APPEARANCES:

22 Greene, Brojlett & Wheeler
23 BY: CHRISTINE D. SPAGNOLI
24 100 Wiltshire Boulevard
25 Suite 2100
P.O. Box 2131
Santa Monica, California 90407-2131

Appearing on behalf of Plaintiffs



- 15 model years, correct?
- 16 A No.
- 17 Q Am I right?
- 18 A There is no reference to the frame rails.
- 19 Q Okay. There is a reference to a change in the fuel
- 20 return line between the 1995 and 1996 model years,
- 21 correct?
- 22 A Yes.
- 23 Q Do you have a recollection of what that change was?
- 24 A No, I don't. That occurred before I was there.
- 25 Q Okay. You mean the change occurred before you were

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- 1 there?
- 2 A Yes.
- 3 Q Okay.
- 4 A It indicates it had changed in the 1995 model year,
- 5 and I came on to test the '96 model year vehicle.
- 6 Q Okay. And this report is the result of those tests,
- 7 correct?
- 8 A The 1996 test.
- 9 Q Right. Now, in connection with the rear impact
- 10 performance of the '96 Grand Cherokee, if we look at
- 11 page 6, does that contain the crash tests that
- 12 supported your verification that the vehicle was in
- 13 compliance with the standard?
- 14 A Page 6 contains the two rear impact crash tests that
- 15 the compliance document relies on,
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16 Q Okay. So in the case of the 1996 Jeep Grand
17 Cherokee, am I correct in understanding that you, as
18 the engineer who certified compliance, relied upon a
19 1991 and a 1992 rear impact test?
20 A Yes.
21 Q And those would have been tests performed on the
22 first model year of the Grand Cherokee; is that
23 right?
24 A They appear to be in the first model year. I did
25 not run those tests myself.

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1 Q Okay. Did you review those tests before certifying
2 compliance of the '96 model year vehicle?
3 A The vehicles, I did not review. We looked at the
4 film and the electronic data, and I spoke to the
5 engineer before who had written this, Ed Zyljik, the
6 early ones, and that was the review that I
7 conducted.
8 Q Okay. And you then gathered and attached the
9 relevant documents from those tests --
10 A Uh-huh.
11 Q -- with your report that you signed in July of 1995,
12 correct?
13 A Yes.
14 Q And if we look in the attachments then, if we first
15 took at test 4561, do you see that if you go -- oh,

16 the pages aren't numbered, I'm sorry to say, but
17 about midway through, I see the Safety Test, Vehicle
18 Crash Test Letter for test 4561, 30 mile per hour
19 rear barrier impact, if you could find that page.
20 A You're looking at the Vehicle Crash Test Letter for
21 4561?
22 Q Correct.
23 A Yes, I have it.
24 Q Okay. Now, this vehicle, which is one of the two
25 crash tests that you relied upon to certify the '96

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1 Jeep Grand Cherokee as being -- having complied with
2 the 301 rear impact crash test requirement, involved
3 a vehicle that was a CI pilot, correct?
4 A Yes, ma'am.
5 Q And a CI pilot is a vehicle that has been built to
6 production but is before the actual production
7 models are coming off the line; is that right?
8 A The -- as I recall, the CI pilots are what we called
9 line fill, and they were the pilot cars that are
10 first built as you fill the entire plant
11 manufacturing system, and some of them come off and
12 then you use them for a variety of tests.
13 Q Okay. In this case the vehicle had at least one
14 nonproduction condition, and that was the rear prop
15 shaft was one inch short. Do you see that?
16 A Yes.

17 Q Do you have some understanding of what that meant?
18 A Yeah. I think that the tube that connects the
19 transfer case with the rear axle was not as long as
20 it was intended to be in production.

21 Q Okay. And what would that mean with respect to that
22 part's proximity to fuel system components? Would
23 there be more clearance in this vehicle than on a
24 production vehicle?

25 A No, there wouldn't be. That prop shaft is attached

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1 to a spline, and what it is is it slides in and out
2 of the spline, and the length of the prop shafts are
3 a dynamic thing right at launch, and they're often
4 changed due to the ride and handling characteristics
5 that the last group that touches the car before it
6 goes into production wants, so the fact that it's a
7 little bit shorter or a little bit longer, it still
8 rides on that spline and it's within more or less
9 the exact same place that it would be, no matter
10 what the length is. It only is how far it rides on
11 the spline of the rear axle at suspension travel.

12 Q Okay.

13 A So when this is at full weight, the vehicle will
14 compress the suspension and it will go as far back
15 on the spline, probably no matter what length it is.

16 Q Okay. Now, if we look at the other test, rear

17 impact test that was used to certify compliance,
18 4472 -- if you could find the Crash Test Letter for
19 that.

20 A I don't find it in this package.

21 Q Okay.

22 MS. [REDACTED]: It should be six pages back --
23 no, no, sorry. I didn't mean to interject, but I
24 just saw something with 4472 on it.

25 MS [REDACTED]: yeah, actually it's not the

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1 Safety Crash Test Letter.

2 Q (BY MS. [REDACTED]): There is one page of an inter
3 company correspondence dated 12-20-91 that is a few
4 pages past the 4561 letter that we just looked at,
5 and it says "To distribution." Do you see that?

6 A Yes, I do.

7 Q What is this?

8 A This is the dynamic crush analysis from the film.

9 Q Okay. Does this at least tell you what the build
10 condition of the crash test vehicle was?

11 A Yes.

12 Q And do you see that this vehicle for test 4472 had a
13 trailer towing package?

14 A Yes, I do.

15 Q Do you have an understanding of what -- what the
16 trailer towing package involved, what components
17 would be attached to the vehicle?
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18 A Yes.

19 Q Can you explain?

20 A The trailer towing package should be a U-shaped
21 bracket that has two arms that go fore-aft along the
22 car on the rear body-in-white rails and a cross
23 piece that has mounted onto it a receiver hitch for
24 a Reese hitch.

25 Q Is it your understanding that with respect to these

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1 1993 model Jeep Grand Cherokees, that the trailer
2 towing U-shaped bracket provided some structural
3 rigidity to the frame rails that assisted the
4 vehicle in meeting the 301 crash test requirement?

5 A Could you repeat that question?

6 Q Sure. Is it your understanding that with respect to
7 the 1993 model Jeep Grand Cherokee that was
8 reflected in this test 4472, that the trailer towing
9 bracket that you've just described provided
10 structural rigidity to the frame rails that assisted
11 the vehicle in meeting the 301 rear impact test
12 requirement?

13 A The trailer hitch provides a structural rigidity.
14 All rigidity is not of a benefit, if it increases
15 the stiffness of the vehicle, and often increases
16 the g forces experienced by the vehicle, because it
17 no longer absorbs the energy through crush, so I

21 forward.
22 Q Okay. So the fact that that had occurred in the
23 development of the vehicle before it was put on the
24 market and validated by your predecessor for the
25 1993 model year was not something that would have

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1 been, you believe, felt to be important to bring to
2 your attention; is that right?

3 A It appears to me, based on this document that you
4 have just showed me now, that the fuel tank issue
5 that was caused by the track bar mounting bracket
6 was modified and fixed.

7 Q Okay. And do you know if that modification or fix
8 is the addition of the track bar bracket shield that
9 is referred to in the letter regarding test 4472?

10 A I cannot say that with certainty, but I assume that.

11 Q Kind of sounds like it's connected to that earlier
12 issue; is that right?

13 A Yes, it does appear to be that way.

14 Q Now, if you look further back in the documents --
15 I'm looking at the Fuel System and Static Rolllover
16 Summaries -- for the tests that were attached as
17 part of your Compliance Report for the 1996 Jeep
18 Grand Cherokee -- do you see -- can you locate for
19 me the Fuel System and Static Rolllover Summary for
20 test No. 4472?

21 A Yes.

[REDACTED]

Vol I.txt

22 Q And can you read for me what the post-test condition
23 notes are that were written in that summary.
24 A Not very well. I believe it says, "Contacted by
25 track bar bracket left front corner. Contacted by

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1 differential housing on rear." It's hard to believe
2 that says rear. There's another mark I cannot
3 interpret.

4 Q And the differential housing would have been
5 forward of the tank, correct?

6 A Yes.

7 Q And the contact by the track bar bracket left front
8 corner is exactly the same type of contact that's
9 referenced in the development report that we looked
10 at, Exhibit 2, correct?

11 A I believe that that's exactly where they added the
12 shielding to prevent the tank from being punctured,
13 yes.

14 Q Okay. And you're assuming that based upon the fact
15 that this note indicates that there was contact in
16 that location?

17 A Yes. That says "the bracket," and on the same side
18 it has, "this bracket has been modified," and then
19 earlier in the design it talks about a track bar
20 shield. I believe they're all the same part.

21 Q Okay. So based on reviewing these documents, am I

22 correct in understanding that the test 4472, there
23 was contact between the tank and two different
24 components of the vehicle in this test?
25 A That's what's noted in the test summary.

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1 Q okay. And if you could now flip to the test summary
2 for test 4561, also for this test, also was used to
3 certify compliance of the 1996 Jeep Grand Cherokee,
4 and we -- have you found that page?

5 A Yes, ma'am.

6 Q Okay. And can you read for me what the notes are in
7 the Post Test Condition next to Tank.

8 A This one says, "contacts: Bumper, TRK bar, TRK bar
9 BRKT [and] tailpipe, axle."

10 Q Okay. Is that tailpipe comma axle?

11 A I think it is a comma.

12 Q Okay. So in the case of test 4561, which you used
13 to certify compliance of the 1996 model Jeep Grand
14 Cherokee with the fuel system standard, there were,
15 in fact, contacts, multiple contacts between the
16 tank and components of the vehicle; is that right?
17 A It indicates there were multiple areas in contact
18 with the tank.

19 Q We have bumper, the track bar, the track bar
20 bracket, the tailpipe and the axle. Those are five
21 different locations of contact, correct?

22 A Yes.

23 Q And then under Straps, can you read what's written
24 there.
25 A It says, "Left J-hook slipped out of slot."

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1 Q What is a J-hook?
2 A There is a hook that holds the strap in place in
3 contact with the body-in-white.
4 Q Does that mean that if the hook slips out of the
5 slot, the tank would become loosened?
6 A It would become -- the straps, when it's in its
7 design condition, hold the tank in place. In the
8 impact test, typically the distance between the two
9 strap ends, which are held with J-hooks one end and
10 a bolt on the other, become foreshortened. There's
11 crush and it would not be unusual for the J-hook to
12 move relative to the body in the slot.
13 Q But it usually doesn't slip out of the slot, right?
14 A It's not -- occurs 100 percent of the time, but it's
15 not unusual for the J-hook to have moved within its
16 slot.
17 MS. [REDACTED]: Move to strike as
18 nonresponsive.
19 Q (BY MS. [REDACTED]): Is it unusual for the J-hook to
20 slip out of the slot?
21 A The J-hooks slip out of the slot occasionally.
22 Q Is that an acceptable result in a compliance test?

Estes [REDACTED] Vol I.txt
23 A The j-hooks can be taken out of the slot during the
24 test while still maintaining the fuel tank in its
25 proper place, and review of the film and review of

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1 the electronic data would determine whether that
2 result was or was not acceptable.

3 Q Did you review that film in this case for this test?
4 A I have no specific memory of reviewing that film,
5 but that is how I trained engineers and how I was
6 probably trained when I came on board.

7 Q Okay. Do you know if you actually reviewed the two
8 crash tests that we've been talking about before you
9 certified compliance, or did you rely upon the fact
10 that your predecessor had found those tests to be
11 acceptable?

12 A I would have looked at every film in the compliance
13 documents and relied on the fact that my predecessor
14 had found them acceptable.

15 Q Now --
16 A In the review, you would be looking for things along
17 the lines that would stand out to you that might not
18 have been there.

19 Q Is it correct, sir, that after you certified
20 compliance of the 1996 Jeep Grand Cherokee in July
21 of 1995, that you initiated or suggested that
22 additional work needed to be done to modify the
23 vehicle to improve its performance on the rear

24 impact test?

25 A When we did the '96 Grand Cherokee, they were trying

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1 to introduce a new design for the fuel tank. The
2 subsequent work in '97 was to try to get that fuel
3 tank to pass the compliance tests and the
4 DaimlerChrysler guidelines.

5 Q The work that was initiated to obtain compliance for
6 the '97 vehicle was beyond changing the fuel tank,
7 correct?

8 A There is a suite of changes that came along with
9 that fuel tank change.

10 Q What changes that affected performance?

11 A Performance in what?

12 Q On the 301 tests.

13 A The exact changes, I wouldn't be able to detail
14 them. In a general way, I knew that they included a
15 new kind of tank and a new kind of vent line and a
16 new kind of fuel pump.

17 Q Any other changes that you believe were implemented
18 for the '97 model to improve the performance of the
19 vehicle on the 301 impact tests, rear impact tests?

20 A In the rear impact tests, to get the second vehicle
21 to pass, we added a bracket which was originally
22 part of the trailer hitch onto the '97 Grand
23 Cherokee structures.

24 Q What did that have to do with the change of the fuel
25 tank?

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1 A The way the fuel tank is manufactured is different,
2 and the way the fill and vent lines are attached to
3 the tank is different, and the way that those fill
4 and vent lines stayed attached to the tank performed
5 differently from the '96 to the '97 model year.

6 Q What does that have to do with the -- a bracket in
7 the frame rail?

8 A The bracket in the frame rail prevented crush, as we
9 spoke before. It translated the crush to a
10 different part of the car and prevented crush at the
11 attachment of the fill and vent lines to the tank so
12 that they would stay attached.

13 Q Where were the fill and vent lines for the tank,
14 what side of the tank?

15 A Left side.

16 Q Isn't it true that with respect to the 1997 vehicle
17 model Jeep Grand Cherokee, that the reason for the
18 track -- I'm sorry, the reason for the frame rail
19 reinforcement was because of excessive crush that
20 you got on a crash test in 1995?

21 A The crush is the same from vehicle to vehicle. What
22 we saw was the performance of the attachment to the
23 fuel line and vent to the tank. That's where the
24 difference was.

25 excessive. [REDACTED] Vol 1 I.txt

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1 Q There was excessive fuel leakage in the test that
2 exhibited the different crush, correct?

3 A Yes.

4 Q And where was the leakage from in that tests ZJ8602?

5 A Do you have the Proving Grounds Test Summary for
6 ZJ8602?

7 Q No, sir. I've asked for it and it's not been
8 produced. All I have is the vehicle Crash Test
9 Request which you can see does not contain any of
10 the information concerning the results of the test,
11 and that's what's been marked as Exhibit 6.

12 MS. [REDACTED] I don't believe that's a rear
13 impact crash test, that number.

14 MS. [REDACTED]: well, counsel, are you
15 testifying?

16 MS. [REDACTED] you said that you asked for
17 it --

18 MS. [REDACTED] I: right.

19 MS. [REDACTED] -- and I'm just telling you
20 that I don't think that that was part of the
21 request. I'll go back and take a look and see.

22 MS. [REDACTED]: well, the Crash Test Request
23 says 30 mile per hour rear barrier. I've repeatedly
24 asked. I've been provided with a request that
25 doesn't contain the results of the test. It's been
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10 vehicles will perform above and beyond the standard.
11 Q Okay. And one of the ways you expect your vehicles
12 to perform above and beyond the standard is to not
13 have their fuel systems compromised if there are
14 weld quality issues in the manufacture of the
15 vehicle, correct?

16 A I expect that the variation in welding can be taken
17 into account in the modeling and the testing and
18 that it will still exceed the standard in a wide
19 variety of conditions.

20 Q Okay. Now, with respect to the Jeep Grand
21 Cherokee's -- vehicle's construction, do you have
22 any reason to believe that there would be any
23 significant difference between a 1996 Jeep Grand
24 Cherokee and a 1997 Jeep Grand Cherokee?

25 MS. [REDACTED]: Objection to form. You can

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1 answer.

2 THE WITNESS: The only vehicle structure
3 difference in the rear of the car that I recall
4 today is the addition of the bracket on the left
5 rear side.

6 Q (BY MS. [REDACTED]): Okay. Do you have any reason to
7 believe that that bracket would affect the stiffness
8 of the vehicle in a significant way?

9 A The stiffness of the vehicle -- I want to be clear
10 about how we define the stiffness of the vehicle.

11 The stiffness of the vehicle in the impact tests is
12 what you're asking me about, the stiffness of the
13 vehicle in a turning maneuver, the stiffness of the
14 vehicle in a trailing maneuver?
15 Q In the tests, in the impact tests.
16 A The stiffness of the vehicle in the impact test,
17 when you add the bracket, it -- you know, I expected
18 it to change it, but there's a way we could -- I
19 mean, if you had the data traces and we looked at
20 the peak g's, you could actually prove whether or
21 not it had increased stiffness. I don't have that
22 data in front of me, but I know my engineering
23 judgement would tell me that, yeah, I expect it to
24 be a little stiffer, but I don't know exactly how
25 much or -- and we would -- I mean, that's a

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1 definable problem but I don't have the data to tell
2 you.
3 Q How would you define that?
4 A I'd look at the accelerometer traces. We put
5 accelerometers on the car. We measure its g forces
6 and you could look at those traces and tell the
7 difference.
8 Q And what would be the effect of a stiffer rear end
9 in a rear impact?

10 MS. [REDACTED]: Objection to form. You can

11 answer.

12 THE WITNESS: It would be kind of
13 speculative for me. I think that the stiffer rear
14 end, the way that bracket made it, allowed the
15 vehicle to perform, I think, in an improved manner.
16 The occupants themselves is what you're asking me?
17 Q (BY MS. [REDACTED]): No, I'm not asking about the
18 occupants. I'm asking about the performance of the
19 vehicle in the rear impact as a result of a stiffer
20 construction.

21 A When you say performance, are we talking about the
22 performance to 301 guidelines for fuel leakage, that
23 metric, the performance in acceleration, the
24 performance as measured how? I'm struggling with
25 that.

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1 Q Well, let's start with compliance with the standard.

2 MS. [REDACTED]: Objection to form.

3 THE WITNESS: The compliance with the
4 standard and the Chrysler guidelines in particular,
5 the compliance to the standard is the same whether
6 or not the bracket is there or not. I think that
7 the bracket enhances the performance of the vehicle
8 with the fuel system contact because of the way it
9 changes the geometry in the test.

10 Q (BY MS. [REDACTED]): Do you believe --

11 A I'm not sure I answered your question.
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Auto-dependent company established in 1986

US-31459

Vehicle Information:

1997 JEEP GRAND CHEROKEE
 LAREDO/TSI
 VIN: 1J4FX58SXXVC
 4 DR. WAGON/SPORT UTILITY
 4.0L 16 FI
 REAR WHEEL DRIVE
 Standard Equipment | Safety Options
 Safety & Reliability

Airbag deployed

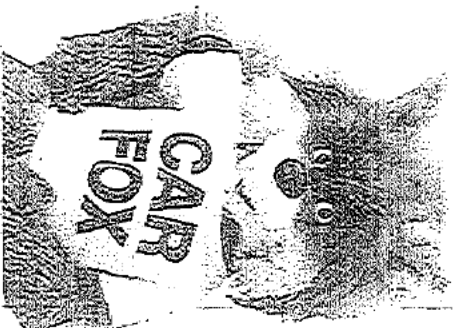
Accident / Damage reported

6 Previous owners

At least 1 open recall

Search for other 1997 JEEP GRAND CHEROKEE vehicles in Orlando, FL

Last reported odometer reading
 155,054
 Below retail book value
 \$290



This CARFAX Vehicle History Report is based only on information supplied to CARFAX and available as of 4/24/12 at 10:12:05 AM (EDT). Other information about this vehicle, including problems, may not have been reported to CARFAX. Use this report as one important tool, along with a vehicle inspection and test drive, to make a better decision about your next used car.

CARFAX Price Calculator™

Adjust the value of this 1997 Jeep Grand Cherokee Laredo/TSI based on the information available in this report

1) Retail Book Value

\$ 0

Enter retail book value here

2) CARFAX Price Adjustment™

-\$290

Below retail book value

3) Adjusted Retail Value

Begin by entering the retail book value



Start by entering the retail book value from a pricing guide website.

This vehicle is worth less than average, based on information in this report.

Compare adjusted retail value to seller's asking price when making your decision.

CARFAX Ownership History

The number of owners is estimated

Year purchased	1-4 Owners 1-4	5 Owner 5	6 Owner 6
Type of owner	See Details	Personal	Personal
Estimated length of ownership	13 yrs. 11 mo.	1 month	11 months
Owned in the following states/provinces	Florida	Florida	Florida
Estimated miles driven per year	See Details
Last reported odometer reading	141,351	155,054	...



Body Style: 4 Dr. Wagon/Sport Utility
 Engine Type: 5.2L V8 FI
 Free CARFAX Report

Central Florida Toyota Scion
 Distance: 13.32 mi
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Detailed History

Glossary

Owner	Date	Mileage	Source	Comments
Owner 1 Purchased: 1997 Type: Corporate Where: Florida Est. length owned: 4/23/97 - 7/13/01 (4 yrs, 2 mo.)	04/23/1997	15	Florida Motor Vehicle Dept. West Palm Beach, FL	Odometer reading reported
	05/15/1997		Florida Motor Vehicle Dept. West Palm Beach, FL	Registered as corporate vehicle
	09/16/1997		Florida Motor Vehicle Dept. West Palm Beach, FL Title	Title issued or updated First owner reported Loan or lien reported
Owner 2 Purchased: 2001 Type: Personal Where: Florida Est. length owned: 7/13/01 - 7/17/04 (3 years)	04/26/1998	24,000	Florida Inspection Station West Palm Beach, FL	Passed emissions inspection
	01/21/1999		Florida Inspection Station West Palm Beach, FL	Passed emissions inspection
	09/28/2000		Florida Motor Vehicle Dept. West Palm Beach, FL Title	Title issued or updated Loan or lien reported
Owner 2	09/17/2001		Florida Motor Vehicle Dept. North Miami Beach, FL Title	Title issued or updated
	11/04/2001	62,130	Florida Motor Vehicle Dept. North Miami Beach, FL	Odometer reading reported
	11/05/2001		Florida Motor Vehicle Dept. North Miami Beach, FL Title	Title issued or updated
Owner 2	09/19/2002		Chrysler	Manufacturer Safety recall issued #B02 FLOOR SHIFTER SECONDARY DETENT SYSTEM Check here for a copy of the owner letter for this Recall or call 1-800-853-1403 if you have any

questions or need additional information on this recall.

03/24/2004 Florida
 Motor Vehicle Dept.
 Not Reported
 FL personal vehicle
 Title [REDACTED]
 Vehicle color noted as White

Owner 3
 Purchased: 2004
 Type: Personal
 Where: Florida
 Est. miles/year: 12,812/yr
 Est. length owned: 7/17/04 - 8/12/05
 (1 year)

Date: Mileage: Source: Comments:
 07/17/2004 127,620 Florida Motor Vehicle Dept. Odometer reading reported
 Hollywood, FL
 07/28/2004 Florida Motor Vehicle Dept. Title issued or updated
 Title [REDACTED] New owner reported

01/28/2005 Florida Motor Vehicle Dept. Registration issued or renewed
 Motor Vehicle Dept. Registered as
 Hollywood, FL personal vehicle
 Title [REDACTED] Vehicle color noted as White

08/12/2005 141,345 Dealer Inventory Vehicle sold
 08/23/2005 141,346 Auto Auction Listed as a dealer vehicle
 Florida Sold at auction

Owner 4
 Purchased: 2005
 Type: Personal
 Where: Florida
 Est. length owned: 9/30/05 - 4/15/11
 (5 yrs. 6 mo.)

Date: Mileage: Source: Comments:
 09/30/2005 141,351 Florida Motor Vehicle Dept. Odometer reading reported
 Port Saint Lucie, FL
 10/07/2005 Florida Motor Vehicle Dept. Title issued or updated
 Port Saint Lucie, FL New owner reported
 Title [REDACTED]

02/08/2007 Florida Motor Vehicle Dept. Registration issued or renewed
 Motor Vehicle Dept. Registered as
 Port Saint Lucie, FL personal vehicle
 Title [REDACTED] Registration updated when owner moved
 the vehicle to a new location
 Vehicle color noted as White
 02/19/2008 Florida Motor Vehicle Dept. Registration issued or renewed
 Motor Vehicle Dept. Registered as
 Port Saint Lucie, FL personal vehicle
 Title [REDACTED] Vehicle color noted as White

Owner 5
 Purchased: 2011
 Type: Personal
 Where: Florida
 Est. length owned: 4/15/11 - 5/20/11
 (1 month)

Date: Mileage: Source: Comments:
 04/15/2011 Florida Motor Vehicle Dept. Vehicle purchase reported
 Orlando, FL
 04/21/2011 Florida Motor Vehicle Dept. Odometer reading reported
 Orlando, FL

04/26/2011 Florida Motor Vehicle Dept. Title issued or updated
 Motor Vehicle Dept. New owner reported
 Orlando, FL Vehicle color noted as White
 Title [REDACTED]

05/18/2011 Florida Motor Vehicle Dept. Vehicle purchase reported
 Daymond, FL Title issued or updated
 Title [REDACTED] Registered as
 personal vehicle
 Vehicle color noted as White

Owner	Date	Mileage	Source	Comments
Ed OWLER 6 Purchased: 2011 Type: Personal Where: Florida Est. length 5/20/11 - present owned: (11 months)	05/20/2011		Florida Motor Vehicle Dept. Daymont, Fl Title	Title Issued or updated New owner reported Vehicle color noted as White
	09/12/2011		Florida Motor Vehicle Dept. Daymont, Fl Title	Registration issued or renewed Registered as personal vehicle Vehicle color noted as White
	11/18/2011		Florida Damage Report	Accident reported Involving rear impact Vehicle towed Airbag deployed



I'm here to help! Print and bring my SmartBuyer Checklist when you go to test drive this 1997 Jeep Grand Cherokee Laredo/TSI.

Print this CARFAX Report and take it to your pre-purchase inspection

Tell us what you know about this vehicle

Have Questions? Please visit our Help Center at www.carfax.com.



Glossary

[View Full Glossary](#)

Accident / Damage Indicator

CARFAX receives information about accidents in all 50 states, the District of Columbia and Canada. Different information in a vehicle's history can indicate an accident or damage, such as: salvage auction, fire damage, police-reported accident, crash test vehicle, damage disclosure, collision repair facility and automotive recycler records. Not every accident or damage event is reported and not all reported are provided to CARFAX. Details about the accident or damage event when reported to CARFAX (e.g. severity, impact location, airbag deployment) are included on the Vehicle History Report. CARFAX recommends you obtain a vehicle inspection from your dealer or an independent mechanic.

- According to the National Safety Council, Injury Facts, 2007 edition, 7% of the 245 million registered vehicles in the U.S. were involved in an accident in 2005. Over 75% of these were considered minor or moderate.
- CARFAX depends on many sources for its accident / damage data. CARFAX can only report what is in our database on 4/24/12 at 10:12:05 AM (EDT). New data will result in a change to this report.

Florida Police Reports:

- Provide an estimate of the extent of damage in its accident reports for the following:
 - SEVERE/TOTALED: The vehicle cannot be driven from the accident scene due to severe damage or an injury. This level of damage often results in a Salvage or Junk title.
 - DISABLED: The vehicle had to be towed or hauled away from the accident location.
 - FUNCTIONAL: The vehicle could be driven from the accident location.
 - MODERATE: The accident damage affects the operation of the vehicle and/or its parts. Examples include broken windows, trunk lids, doors, bumpers and tires.
 - MINOR: The accident damage does not affect the operation of the vehicle. Examples include dented bumpers, fenders, grills and body panels. This level of accident should not compromise vehicle safety.
 - NO DAMAGE: The vehicle was not damaged.
- Are required if the estimated damage exceeds \$500

Airbag Deployment

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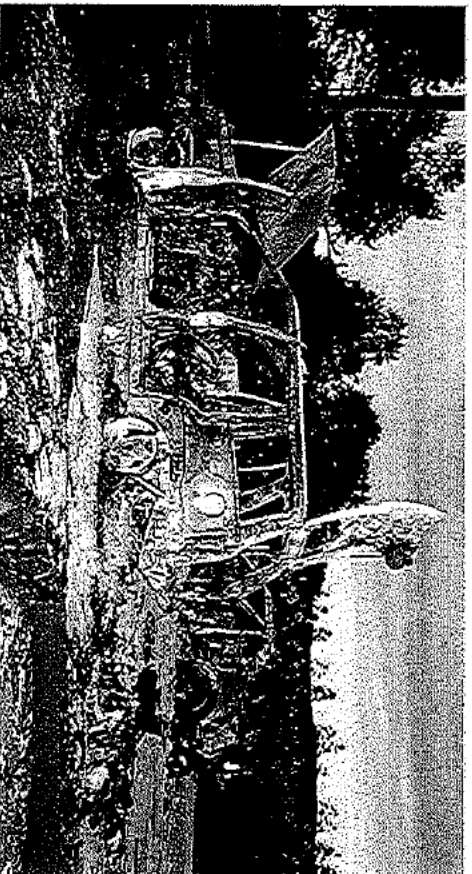
September 1, 2011

Sergio Marchionne, Chairman
Chrysler Group LLC
1000 Chrysler Drive
Auburn Hills MI 48321-8004

Dear Chairman Marchionne:

On May 8, 2011, you gave a commencement address at the [REDACTED] in which you stressed social responsibility. You charged: "I believe that the future is not just the responsibility of governments. It's an individual and collective responsibility. It's a challenge that calls for a concerted and shared commitment. Closing our eyes, or thinking that finding a solution is someone else's role, makes us part of the problem."

How apt that you made this address in Toledo the home of the Jeep and where the Grand Cherokee is made because the terrible and rising fire death toll of the 1993-2004 Grand Cherokee represents the largest social responsibility facing Chrysler today. Like a toxic waste site, these vehicles are legacy of the old Chrysler which the new Chrysler is called upon to clean up. As you told the Toledo graduates, "The essence of leadership, when all is said and done, is the personal assumption of the moral duty to be proactive in building our future." The future of the new Chrysler lies in not only the marketability of its new models but also how it handles the legacy of its older models, particularly the toxic 1993-2004 Jeep Grand Cherokee depicted in the hauntingly surreal photo of the burned out hulk of the 1997 Grand Cherokee that terribly burned the [REDACTED] sisters and buried [REDACTED] to death. Note the lack of structural damage showing there would have been no injuries but for the fire.



Picture 1 - [REDACTED] Crash Post Accident Photos



The Safety Problem

The 1993-2004 Jeep Grand Cherokee is a modern day Pinto for soccer moms. As with the Pinto, the fuel tank is located behind the rear axle: a dangerously vulnerable area in the rear impact crush zone. The tank is made of plastic and has a fuel filler hose that is vulnerable to separation in a rear crash. The tank itself has no valve that would ensure containment of fuel in the event of such a separation. In the United States alone from 1993 through 2009, there have been 184 fatal fire crashes in Jeep Grand Cherokees that have resulted in 269 deaths and numerous burn injuries. At least 78 of the deaths are due to fire according to available medical and government records with the real number of fire deaths higher.

In 2005, under pressure from its merger partner Daimler-Benz, Chrysler moved the fuel tank forward of the rear axle to the safer location used almost universally in light motor vehicles. Despite the fuel tank not only being behind the rear axle but also extending below the rear bumper, a 3 mm fuel tank shield or skid plate produced by Chrysler was not made standard on any 1993-2004 Grand Cherokee. The 1999-2004 Grand Cherokees had an inadequate 1 mm brush guard that did no more than what its name implied -- guarded the tank from brush.

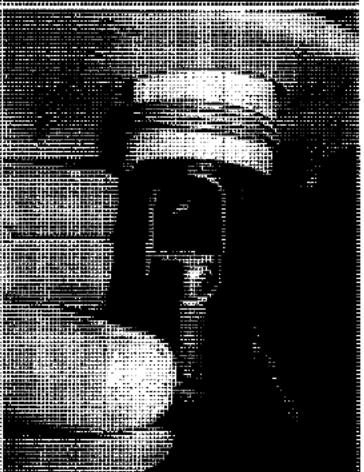
In 1978, Chrysler Automotive Safety Manager J.L. Baker laid out the basic principles for fuel system safety for Chrysler cars and trucks based on the Ford Pinto which included moving the fuel tank ahead of the rear axle and ensuring the filler neck, cap and tube remained attached to the fuel tank to avoid fuel leakage.¹ In SUVs, Baker recommended a protective impact deflection system for the fuel tank recognizing the mismatch between bumpers that allow lower passenger car to come under and impact the fuel tank if it could not be relocated forward of the rear axle in an SUV. Yet none of these recommendations were carried out in the 1993-2004 Grand Cherokee. If they had, many Grand Cherokee crash fire victims would have lived.

The vulnerability of the fuel tank is exacerbated by the dangerous design of the fuel filler hose. In 1993-1998 Grand Cherokees, the filler hose goes through the frame rail unlike any other passenger vehicle. In the event of a rear impact, the filler hose is likely to be pulled out of the fuel tank as the frame rail bends upward. In 1999-2004 Grand Cherokees, Chrysler relocated the filler hose under a redesigned, solid frame rail and improved the connection between the tank and filler hose. With this revised design, the filler hose became vulnerable to separating from the filler cap housing and inlet pipe at its upper end. The plastic fuel tank itself is vulnerable to puncture from sharp objects that are part of either vehicle in a rear impact crash. None of the 1993-2004 models has an effective check valve in the fuel tank to stop fuel flow when the filler hose is pulled loose. Other similar vehicles at that time such as the Ford Explorer and Oldsmobile Bravada had check valves that prevent fuel flow if the filler hose pulled loose from either the tank or the filler neck.

¹ "Fuel System Design – Chrysler Passenger Cars And Trucks," Memo from J.L. Baker, Manager Automotive Safety, to R.M. Sinclair, Director International Product Development, August 24, 1978. See http://www.autosafety.org/sites/default/files/inccc_staff_uploads/BakerFuelMemo1978.pdf



Picture 2 – Ineffective Grand Cherokee Check Valve



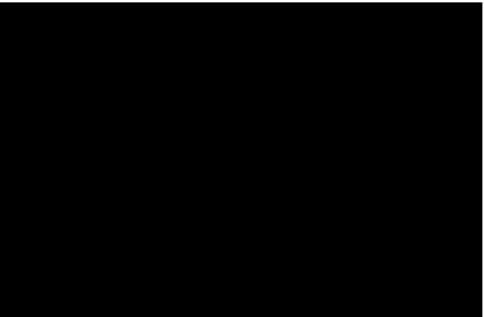
Picture 3 – 2002 Ford Explorer Check Valve

Grand Cherokee Has Highest Fire Death Rate of Similar SUV's – 20 Times Explorer

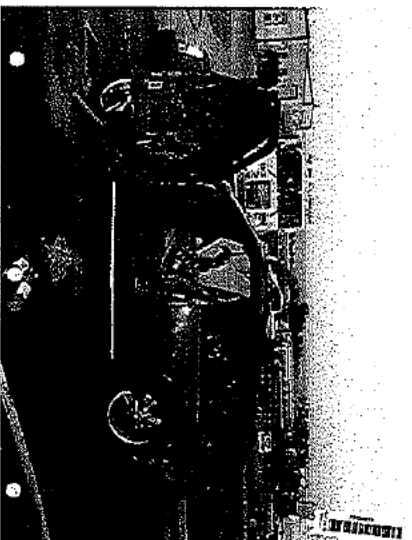
Chrysler's own analysis of rear impact fire deaths in NHTSA's Fatal Accident Reporting System database (FARS) shows the Jeep Grand Cherokee to have by far the worst fire death rate of any SUV with more than one fire death. Chrysler's FARS analysis shows 22 fatal rear crashes in nine different 1993-2004 SUVs with fire as the Most Harmful Event - 12 of them in 1993-2004 Jeep Grand Cherokees. Three of the nine SUVs have no fatal rear MHE fire crashes and three have only one fatal rear MHE fire crash. The Jeep Grand Cherokee with a MHE fire death rate of 0.44 per million vehicle years of use is by far the worst performing SUV in rear impact fire crashes. The Grand Cherokee's biggest competitor, the Ford Explorer with a fuel tank in front of the rear axle had a MHE fire death rate of only 0.02 per million vehicle years of use, making the Grand Cherokee twenty times higher than the Explorer.²

The Grand Cherokee fire death rate would be even higher if Chrysler had included the three other rear fire crashes identified by CAS where an occupant of a Grand Cherokee died by fire. And still higher yet if deaths to the occupant in the striking vehicle were included as NHTSA did in the FMVSS 301 rulemaking and the GM Pickup Defect Investigation. Chrysler's FARS analysis did not include [REDACTED] burn death because he was in the striking vehicle. (See Picture 1.) Nor did it include the burn death of [REDACTED] year old [REDACTED] even though Chrysler confidentially settled the case.

² See Chrysler presentation to NHTSA, "1993-2004 MY Grand Cherokee Chrysler's Analysis of FARS Data" <http://www-odi.nhtsa.dot.gov/ocems/docserver/Artemis/Public/Pursuits/2010/PP/INME-PE10031-46240P.pdf> and Center for Auto Safety letter to NHTSA Administrator David Strickland: https://docs.google.com/viewer?e=v&pid=explorer&chrome=true&srcid=0B308rVa_bKJAVODZjNjMzYyY1ODQ2Ny00MDM4LTk4QVYwMjM0NDc4ZDZlNjYm14&hl=en_US



Picture 4 – [REDACTED]



Picture 5 – [REDACTED] Crash Photo

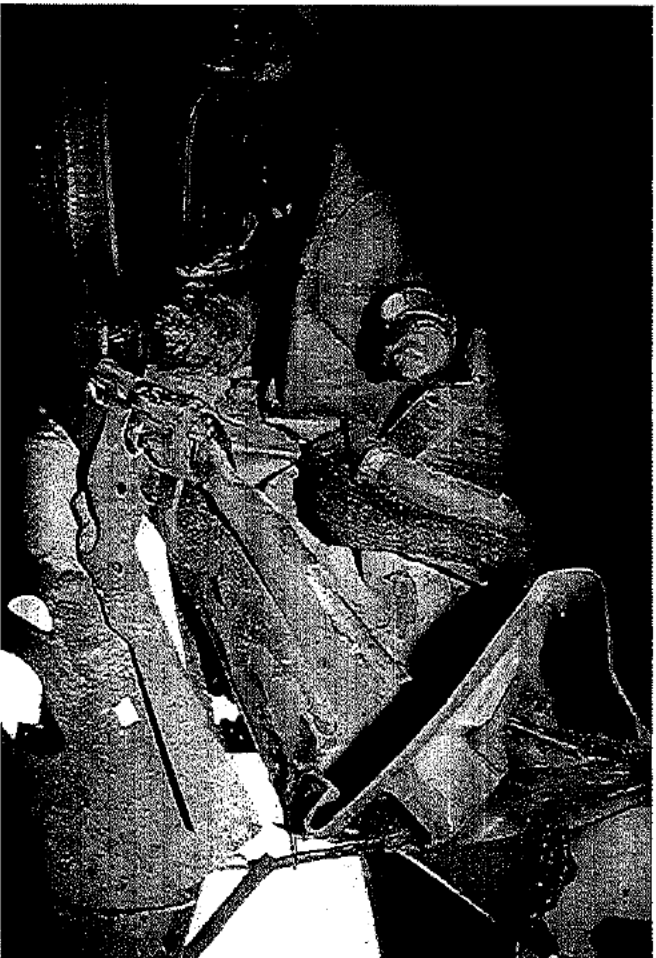
Old Chrysler's Defect Knowledge

Chrysler engineers knew about the deadly defects in the Jeep Grand Cherokee early on. Crash tests conducted by the company demonstrated failures of the fuel tank, frame rail and filler hose connections coupled with fuel flow from the tank unstemmed by any effective check valve. For example, Chrysler Test 5380 had the fuel filler pull out of the fuel tank with a massive leak unstemmed by an effective check valve used by other manufacturers.³

Chrysler engineer [REDACTED] discussed the problems of both filler hose and fuel tank location in a deposition in [REDACTED] v. Chrysler.⁴ Mr. [REDACTED] deposition showed throughout that the behind the rear axle location of the fuel tank in the crush zone led to repeated contact with transmission and suspension components in crash tests. (Id. at [REDACTED] Mr. [REDACTED] also testified that in crash test 5380 the connection plug holding the fuel hose and vent lines pulled loose from the fuel tank allowing the fuel to flow out of the tank. He attributed this to a failure of the ultrasonic weld securing the plug fitting to the fuel tank. (Id. at [REDACTED] This is precisely the failure mode shown in the FHWA crash test depicted below.

³ See [http://www.autosafety.org/sites/default/files/incc_staff_upload\\$\[REDACTED\]%20Deposition%20Exhibit%207.pdf](http://www.autosafety.org/sites/default/files/incc_staff_upload$[REDACTED]%20Deposition%20Exhibit%207.pdf)

⁴ A copy of the deposition is posted at <http://www-odi.nhtsa.dot.gov/acms/docserv/le/Artemis/Public/Pursuits/2009/DP/INMIE-DP09005-39045P.pdf>



Picture 6 – Fuel Filler/Emission Control Line Plate Failure

Mr. [REDACTED] went on to testify that the frame rail bent inward and closed on the fuel hose and vent line pulling them away from the tank. [REDACTED] Mr. [REDACTED] testified that a frame rail reinforcement bracket was added to keep the frame rail from closing on the fuel lines. (Id. at [REDACTED]) The reinforcement bracket added to strengthen the frame rail is shown below.



Picture 7 – Reinforcement Bracket

FHWA and CAS Vehicle to Vehicle Crash Tests

Three recent crash tests of various models of these vehicles conducted by the George Washington University for the Federal Highway Administration (FHWA) and by the Center for Auto Safety have confirmed and demonstrated that the design flaws and vulnerabilities of the fuel tank and its connections result in major fuel spills and fire in rear impacts.⁵ All three crash tests were vehicle to vehicle 30% offset rear impacts similar to new Federal Motor Vehicle Safety Standard (FMVSS) 301 with the striking vehicle being a Ford Taurus. Two of the tests were run at the 50 mph impact velocity in FMVSS 301 while the third was run at only 40 mph.

On the earlier models (through the 1998 model year) the filler and the vent hoses are routed through the left rear frame rail while in the later models, they are routed under the left rear frame rail. The earlier models had no standard shield protecting the fuel tank. On the later models, there is either a 1 mm brush guard or a 3 mm skid plate covering the underside of the tank. The skid plate is bolted to the rear frame rails so that the two hoses entering the tank are effectively tied to the frame rail. If the frame rail and fuel tank do not move together in a crash, this forces a separation of the filler hose from the tank. If they do move together, the filler hose can pull loose from the fuel filler inlet.

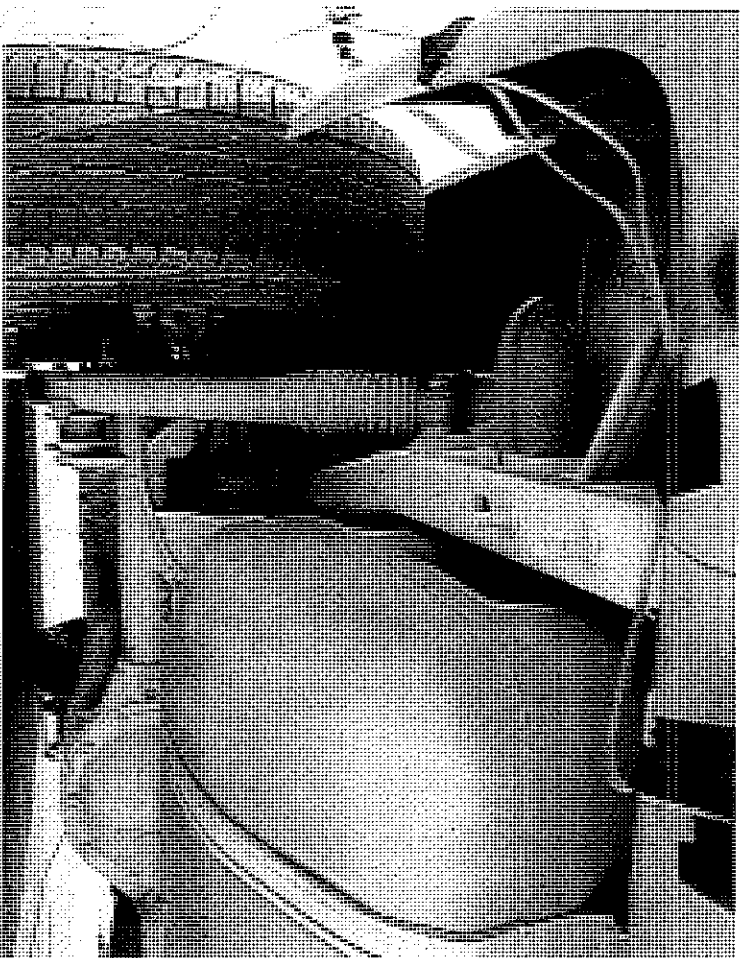


Figure 8 - Fuel Filler Hoses Routed Through Frame Rail

When these vehicles were marketed, they were among a very few that continued to place the fuel tank behind the rear axle, and they are the only known vehicles that route the fuel filler

⁵ See <http://www.autosafety.org/ceep-grand-cherokee-crash-tests>

through the frame rail. Manufacturing the tank out of plastic also makes it vulnerable, in the event of a fuel fire, to being melted or burned so that it can no longer contain any fuel.

The crash tests conducted at the FHWA Turner-Fairbank facility and at KARCO Engineering highlighted significant shortcomings of the Grand Cherokee fuel tank design beyond its location and the routing of fuel lines. The tank has no effective check valve at the entry point of the fuel filler hose that would seal the tank and prevent fuel leakage in the event of a separation of the fuel filler hose from the tank. While it does have a check valve that can prevent backflow into the filler line if the pressure in the tank is greater than atmospheric pressure, that check valve will open once the pressure on either side of the valve is equalized.

Thus, in the first of the KARCO Engineering tests, this valve opened once the vehicle was rolled in the spit test required by FMVSS 30, permitting all of the fuel (actually Stoddard fluid used for testing because it is not flammable) in the tank to flow out. (See Picture 2 for Chrysler check valve.)

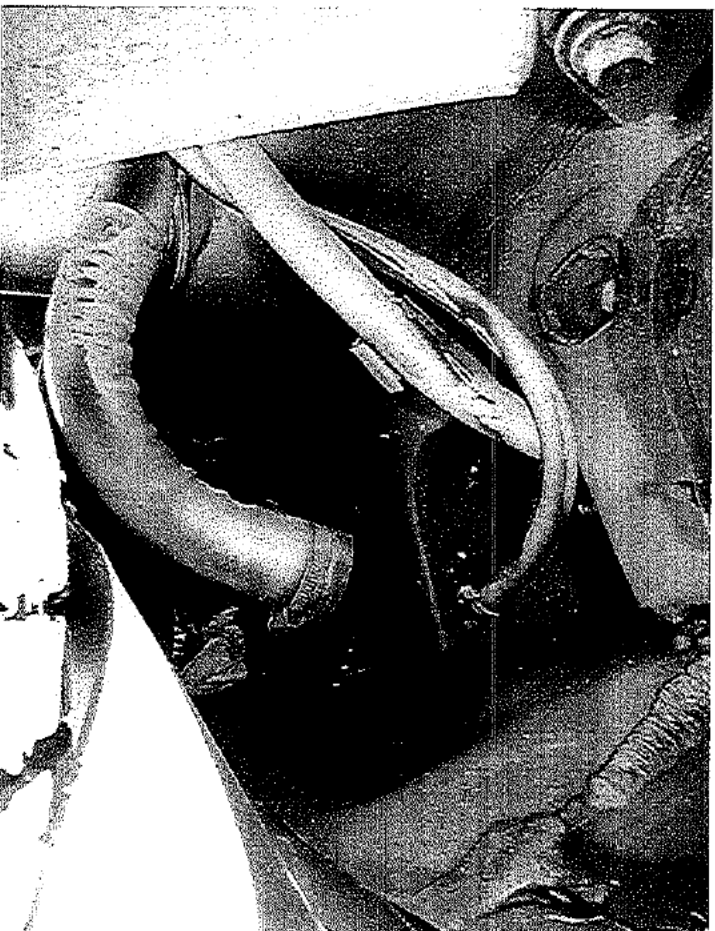


Picture 9 – Stoddard Fluid Leaking from Fuel Tank

The fuel filler and vent lines are attached to a small plastic plate that is “welded” to the tank. In the Turner-Fairbank test of a 1995 Grand Cherokee equipped with the optional 3 mm skid plate, this “welding” failed completely and the entire plate came free of the tank. (See

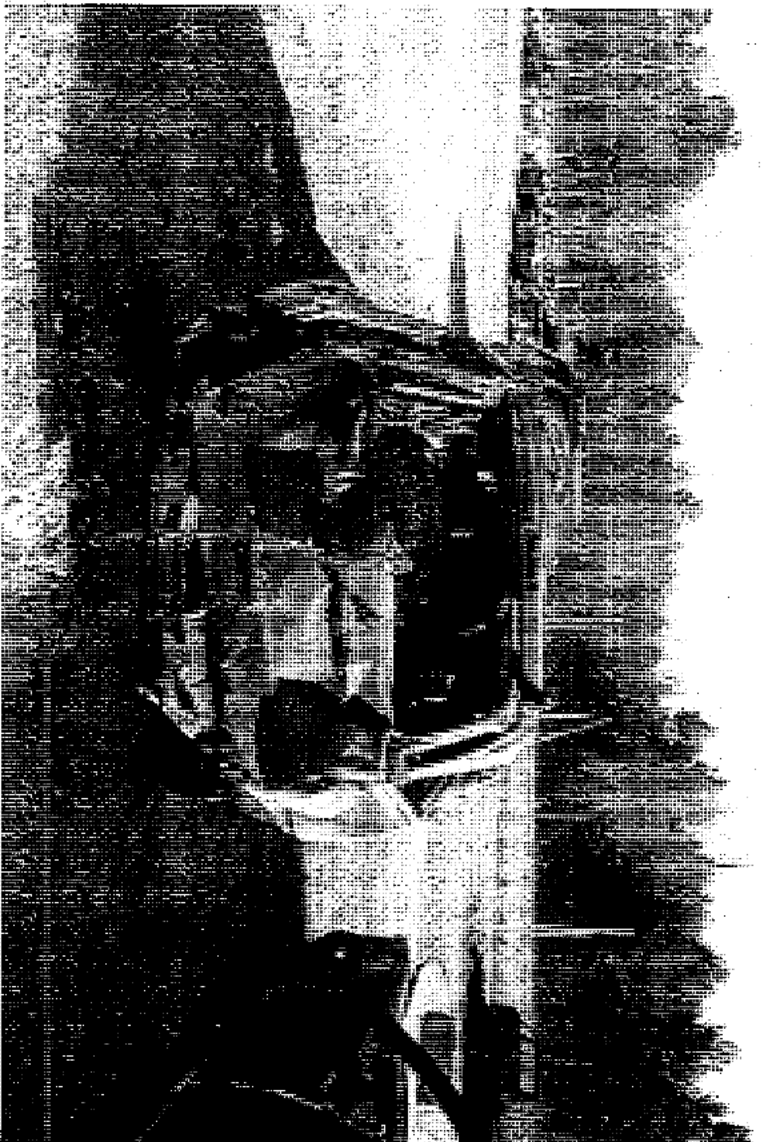
Picture 6.) This is precisely the failure mode identified by Chrysler in crash test 5380 and discussed by Chrysler engineer [REDACTED]. The back pressure check valve came out along with the attached hoses. This failure left a large hole in the left side of the tank permitting massive loss of fuel during the impact. The Delta V (change of speed experienced by the Grand Cherokee in the crash) was 23 mph, far below the 35 mph Delta V in NHTSA's New Car Assessment Program which vehicle occupants survive. But for fire, these tests show the occupants should easily survive the crash forces in 50 mph rear impacts.

In the first KARCO Engineering test at 50 mph 30% offset rear impact, the upper end of the fuel filler hose of the 1999 Grand Cherokee came off its attachment to the fuel filler inlet tube. (See Picture 10 below.) When the vehicle was rolled in the spit test required by FMVSS 301, the fuel was free to flow out through the filler tube as shown in Picture 9. In this test, the Delta V was 26 miles/hour. Like the FHWA test, this vehicle was equipped with the 3 mm skid plate.



Picture 10 – Fuel Filler Detachment

Rollover fires are all too common in Jeep Grand Cherokees with the FARS database showing 23 deaths in 15 fatal fire crashes involving rollover of 1993-2004 Grand Cherokees. Of these, 21 were coded by FARS as MHB fire which undercounts actual fire deaths. For example, [REDACTED] was burned to death according to the autopsy report in the rollover of the 2002 Grand Cherokee which is shown in Picture 11 below. The lack of an effective check valve used by other manufacturers in their SUV's could have prevented many of these fire deaths.



Picture 11 -- [REDACTED] Crash

The second KARCO Engineering test of a 1996 Grand Cherokee was conducted at a substantially reduced impact velocity of 40 mph to demonstrate the vulnerability of Grand Cherokees with fuel tanks behind the rear axle in lower speed impacts. This Grand Cherokee was the standard vehicle without the optional plate under the tank. The Delta V was only 21 mph which is a clearly survivable crash if there were no fire. The filler hose remained attached to the tank and to the filler inlet but the tank ruptured and spilled its entire fuel content immediately. (See Pictures 12 & 13 below showing the ruptured tank and the fuel pouring out of the tank into collection containers.).



Picture 12 – 1996 Grand Cherokee Punctured Fuel Tank



Picture 13 – Fuel Leakage from Fuel Tank



Picture 12 – 1996 Grand Cherokee Punctured Fuel Tank



Picture 13 – Fuel Leakage from Fuel Tank

The 1993-2004 Jeep Grand Cherokee designed by the old Chrysler Corporation and corrected by relocation of the fuel tank in 2005 by DaimlerChrysler has and will continue to claim a terrible toll of burn victims. As the CEO of the new Chrysler Group LLC who has spoken out about the social responsibility of leaders not to close their eyes to problems but to find solutions, the Center for Auto Safety and the families of victims call on you to recall all 1993-04 Jeep Grand Cherokees and remedy the defects in their fuel systems so this defect does not claim any more victims.

Sincerely,

A handwritten signature in black ink, appearing to read "Clarence Ditlow". The signature is written in a cursive, flowing style.

Clarence Ditlow
Executive Director

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Clarence Ditlow
Executive Director

CENTER FOR AUTO SAFETY

1925 CONNECTICUT AVENUE NW SUITE 350 WASHINGTON DC 20003-5708
202-328-7700  www.autosafety.org

October 2, 2009

Ronald Medford, Acting Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington DC 20590

PETITION

Dear Deputy Administrator Medford:

The Center for Auto Safety (CAS) petitions the National Highway Traffic Safety Administration (NHTSA) to initiate a defect investigation into and recall all 1993-2004 Jeep Grand Cherokee with a fuel tank located behind the rear axle. Unlike the earlier Jeep Cherokee, the fuel tank of the Grand Cherokee is plastic and extends below the rear bumper so there is nothing to protect the tank from a direct hit in a rollover or by a vehicle with a low front profile or one lowered by pre-impact braking.

The design is so bad that Chrysler frequently settles lawsuits without extensive discovery and subject to confidentiality agreements. A search of NHTSA's FARS files for fatal fire crashes where there was a fire occurrence in a 1993-2004 Jeep Grand Cherokee from calendar year 1992 through 2008 found 172 fatal fire crashes with 254 fatalities. (Attachment A.) With an additional known fatal fire crash in 2009, there have been at least 44 crashes with 64 fatalities where the Most Harmful Event is fire.¹ (Attachment B.) In comparison, NHTSA reported a total of 38 fire crashes involving only 26 fire deaths in the Ford Pinto when it issued its initial defect report in May 1978. (Attachment C.)

The fuel system in the 1993-04 Grand Cherokee is defectively designed in that it contains a plastic fuel tank subject to rupture, degrades in performance over time, a fuel filler neck that tears off in a range of crashes, a hostile environment with sharp objects such as suspension bolts that can puncture the tank, extends below the bumper and is unshielded although Chrysler offers an optional 3/16" steel shield as a "skid plate" for off road use which would protect the tank in rear impacts where there is pre-crash braking of the striking vehicle. Similar shields are offered in the aftermarket by companies like Quadratic and take advantage of OEM holes in the frame rail to mount the shields.²

With funding from General Motors, the Motor Vehicle Fire Research Institute (MVFRI) has performed detailed technical assignments of the fuel tanks and fuel systems in motor vehicles. As pointed out in the assessment of the 2003 Grand Cherokee, the rear sway bar link bolt is only

¹ This excludes FARS Case [REDACTED] on March 16, 1996 in California involving a crash between a 1996 Grand Cherokee and a classic 1971 Ford Mustang which also had a known fuel tank hazard.

² http://www.quadratic.com/products/12500_301.htm



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1025 CONNECTICUT AVENUE NW SUITE 350 WASHINGTON DC 20009-5700
202-328-7700 www.autosafety.org

October 2, 2009

Ronald Medford, Acting Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington DC 20590

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² http://www.quadratic.com/products/12500_301.htm



3 centimeters away from the plastic tank and could easily puncture the tank in a crash.³ MVFRI also found that plastic fuel tanks, particularly those like the 1993-04 Grand Cherokee located behind the rear axle, degraded in performance over time and were more subject to leakage in crashes.⁴

After it became a merged company with Mercedes, DaimlerChrysler moved the fuel tank in board of the rear axle in 2005 and shielded it. Since the relocation of the fuel tank in 2005 and later Grand Cherokees, there has only been one fatal fire crash in the redesigned vehicle. And that fire occurred after both occupants had been ejected in a rollover of a 2008 Grand Cherokee so that the deaths were not caused by fire.

Due to confidential settlements, the details of most lawsuits are not available. What is available demonstrates the existence of a safety defect in this vehicle. In v Chrysler, the attorneys identified a common hazard as the location of the tank and a filler neck that easily torn off in a crash as fire hazards. In this case, a 2001 Grand Cherokee was beginning to go through a green light when it was struck in the rear by a Town Car traveling at only 20 to 25 miles per hour. (Attachment E.) In FARS case in Long Island NY on September 1, 1999, a stopped 1997 Grand Cherokee was struck from behind by a braking Toyota MR2. Two sisters in the back of the Grand Cherokee were severely burned when they could not get out of the Jeep due to jammed doors. The driver of the MR2, a gardener from was fatally burned as he was enveloped by the burning fuel from the ruptured tank of the Grand Cherokee.

 of New Jersey was in a 1996 Grand Cherokee when it was struck from behind by a 2004 Toyota Sienna. The doors on the Jeep jammed in the impact. Mrs. climbed from the driver side to the passenger side trying to get out of the burning vehicle but was unsuccessful. Her skeletal body was found in the passenger seat. (Attachment F.) This crash and the Long Island crash both demonstrate the unique hazards of an unshielded tank extending below the rear bumper where it can be engaged by the lowered front of a striking vehicle and shoved up into the structure of the vehicle above the tank and ruptured. The low hanging, exposed fuel tank of the 1993-04 Grand Cherokee is also particular vulnerable in rollover crashes where it can strike fixed objects as it rolls. Later model Grand Cherokees have a 1milimeter brush guard that is cosmetic and offers no protection. The optional skid plate offered by Chrysler and aftermarket manufacturers is three times as thick and provides protection in such crashes.

Just like the 1971-76 Ford Pinto and 1973-87 General Motors in which NHTSA made initial determinations of safety defects despite both vehicles meeting FMVSS 301, the Grand Cherokee purportedly met FMVSS 301 although early 2002 models were subject to a non-compliance recall, 02V-032. However, as show above the Grand Cherokee contains safety defects not covered by the performance requirements of FMVSS 301 and should be recalled.

Ironically, New Chrysler tried to escape liability for all future Grand Cherokee crashes occurring after the bankruptcy where the vehicle was sold before the bankruptcy. Just days after the bankruptcy was killed in his 2004 Grand Cherokee on July 10, 2009 when it was

³ www.nvfrl.org/Contracts/Final%20Reports/BioKinetics-Phase-II/ReportTool/vehiclefiles/index.html#2.

⁴ K Digges, et al, "Fire Safety Performance in Crashes," ESV Conference 2003. (Attachment D.)

3 centimeters away from the plastic tank and could easily puncture the tank in a crash.³ MVFRI also found that plastic fuel tanks, particularly those like the 1993-04 Grand Cherokee located behind the rear axle, degraded in performance over time and were more subject to leakage in crashes.⁴

After it became a merged company with Mercedes, DaimlerChrysler moved the fuel tank in board of the rear axle in 2005 and shielded it. Since the relocation of the fuel tank in 2005 and later Grand Cherokees, there has only been one fatal fire crash in the redesigned vehicle. And that fire occurred after both occupants had been ejected in a rollover of a 2008 Grand Cherokee so that the deaths were not caused by fire.

Due to confidential settlements, the details of most lawsuits are not available. What is available demonstrates the existence of a safety defect in this vehicle. In ██████ Chrysler, the attorneys identified a common hazard as the location of the tank and a filler neck that easily torn off in a crash as fire hazards. In this case, a 2001 Grand Cherokee was beginning to go through a green light when it was struck in the rear by a Town Car traveling at only 20 to 25 miles per hour. (Attachment E.) In FARS case ██████ in Long Island NY on September 1, 1999, a stopped 1997 Grand Cherokee was struck from behind by a braking Toyota MR2. Two sisters in the back of the Grand Cherokee were severely burned when they could not get out of the Jeep due to jammed doors. The driver of the MR2, a gardener from ██████ was fatally burned as he was enveloped by the burning fuel from the ruptured tank of the Grand Cherokee.

█████ of New Jersey was in a 1996 Grand Cherokee when it was struck from behind by a 2004 Toyota Sienna. The doors on the Jeep jammed in the impact. Mrs. ██████ climbed from the driver side to the passenger side trying to get out of the burning vehicle but was unsuccessful. Her skeletal body was found in the passenger seat. (Attachment F.) This crash and the Long Island crash both demonstrate the unique hazards of an unshielded tank extending below the rear bumper where it can be engaged by the lowered front of a striking vehicle and shoved up into the structure of the vehicle above the tank and ruptured. The low hanging, exposed fuel tank of the 1993-04 Grand Cherokee is also particular vulnerable in rollover crashes where it can strike fixed objects as it rolls. Later model Grand Cherokees have a 1millimeter brush guard that is cosmetic and offers no protection. The optional skid plate offered by Chrysler and aftermarket manufacturers is three times as thick and provides protection in such crashes.

Just like the 1971-76 Ford Pinto and 1973-87 General Motors in which NHTSA made initial determinations of safety defects despite both vehicles meeting FMVSS 301, the Grand Cherokee purportedly met FMVSS 301 although early 2002 models were subject to a non-compliance recall, 02V-032. However, as show above the Grand Cherokee contains safety defects not covered by the performance requirements of FMVSS 301 and should be recalled.

Ironically, New Chrysler tried to escape liability for all future Grand Cherokee crashes occurring after the bankruptcy where the vehicle was sold before the bankruptcy. Just days after the bankruptcy ██████ was killed in his 2004 Grand Cherokee on July 10, 2009 when it was

³ www.mvfr.org/Contracts/Final%20Reports/BioKinetics-Phase-II/ReportTool/vehiclefiles/index.html#2.

⁴ K Digges, et al, "Fire Safety Performance in Crashes," ESV Conference 2003. (Attachment D.)

hit by a transit bus.⁵ The autopsy showed he died by fire, not by the trauma of the impact. Under intense public pressure, New Chrysler relented and agreed to cover future product liability losses. (Attachment H.) However New Chrysler still refused to accept responsibility for victims like [REDACTED] whose tragic crashes occurred prior to the bankruptcy.

The 1993-04 Grand Cherokee has a fatal crash fire occurrence rate that is about four times higher than SUVs made by other companies. Comparing the 1993-04 Grand Cherokee with the exposed rear fuel tank to the 2005 and later Grand Cherokee with the shielded fuel tank in front of rear axle in the first five years of use for both vehicles so that it's an apples to apples comparison, the defective old Grand Cherokee has a fatal fire rate six times higher than the new Grand Cherokee.

To protect the public from more fire deaths and injuries in the 1993-04 Grand Cherokee as they continue to crash and burn, the Center for Auto Safety requests an immediate recall.

Respectfully submitted,



Clarence M. Dillow

⁵ Attachment G is a copy of the initial police report.

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The 1993-04 Grand Cherokee has a fatal crash fire occurrence rate that is about four times higher than SUVs made by other companies. Comparing the 1993-04 Grand Cherokee with the exposed rear fuel tank to the 2005 and later Grand Cherokee with the shielded fuel tank in front of rear axle in the first five years of use for both vehicles so that it's an apples to apples comparison, the defective old Grand Cherokee has a fatal fire rate six times higher than the new Grand Cherokee.

To protect the public from more fire deaths and injuries in the 1993-04 Grand Cherokee as they continue to crash and burn, the Center for Auto Safety requests an immediate recall.

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Attachment A
MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes, 1992-2008

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MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes, 1992-2008

MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes, 1992-2008

This table includes known fire crashes obtained from NHTSA's Fatal Analysis Crash System (FARS) for Calendar Years 1992-2008 and from public records for other years and for crashes not listed in FARS. Where FARS indicates fire is the most harmful event, that is indicated. Where FARS indicates vehicle in transport, striking tree or other object, that is indicated.

MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes, 1992-2008

This table includes known fire crashes obtained from NHTSA's Fatal Analysis Crash System (FARS) for Calendar Years 1992-2008 and from public records for other years and for crashes not listed in FARS. Where FARS indicates fire is the most harmful event, that is indicated. Where FARS indicates vehicle in transport, striking tree or other object, that is indicated.

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Alabama						
09/26/01**	FARS (overturn)	Blount Co.		2	2000 Grand Cherokee	
04/12/06 ^f	FARS	Montgomery		1	2004 Grand Cherokee	
04/25/07 ^f	FARS	Macon Co.		1	1993 Grand Cherokee	
Alaska						
10/12/02*	FARS	Kenai Peninsula		2	2000 Grand Cherokee	
Arizona						
02/01/98 ^f	FARS	Gila Co.		1	1993 Grand Cherokee	
08/18/98**	FARS (bridge rail)	Mohave Co.		1	1995 Grand Cherokee	
03/13/01 ^f	FARS	Mohave Co.		2	1994 Grand Cherokee	
11/26/06**†(1)	FARS	Surprise		1	1995 Grand Cherokee	
Arkansas						
09/14/04**†(1)	FARS	Carroll Co.		2	1999 Grand Cherokee	
California						
03/06/96**†(1)	FARS	Indio		2	1993 Grand Cherokee	
03/16/96 ^f †(5)	FARS	Carson		5	1996 Grand Cherokee	
07/07/96 ^f †(1)	FARS	Poway		1	1993 Grand Cherokee	
06/14/98**†(1)	FARS (barrier)	Victorville		1	1993 Grand Cherokee	
10/27/99 ^f	Young Sup Lee	Los Angeles		1	1998 Grand Cherokee	
05/07/00 ^f	FARS	Orange Co.		1	1993 Grand Cherokee	
07/20/01 ^f	FARS	San Bernardino Co.		1	1994 Grand Cherokee	
08/07/01**	FARS (tree)	Los Gatos		1	1998 Grand Cherokee	
03/23/02**†(1)	FARS	Sutter Co.		2	1995 Grand Cherokee	
07/13/02**	FARS	San Luis Obispo Co.		1	2000 Grand Cherokee	
08/30/02 ^f	FARS	Bakersfield		1	1993 Grand Cherokee	
10/11/02**	FARS (overturn)	Fresno Co.		1	1993 Grand Cherokee	
10/04/03*	FARS	Anaheim		2	2004 Grand Cherokee	
11/27/03**	FARS (utility pole)	Commerce		1	1996 Grand Cherokee	
02/05/04*	FARS	San Bernardino Co.		1	1995 Grand Cherokee	
05/26/04**†(2)	FARS (overturn)	Vacaville		4	2004 Grand Cherokee	
06/08/04**	FARS (parked vehicle)	Riverside Co.		1	1997 Grand Cherokee	
08/18/05 ^f	James Lindskog	Oceanside		1	1994 Grand Cherokee	
05/24/06 ^f †(1)	FARS	Orange Co.		2	2001 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Alabama						
09/26/01**	FARS (overturn)	Blount Co.		2	2000 Grand Cherokee	
04/12/06 ^F	FARS	Montgomery		1	2004 Grand Cherokee	
04/25/07 ^F	FARS	Macon Co.		1	1993 Grand Cherokee	
Alaska						
10/12/02*	FARS	Kenai Peninsula		2	2000 Grand Cherokee	
Arizona						
02/01/98 ^F	FARS	Gila Co.		1	1993 Grand Cherokee	
08/18/98**	FARS (bridge rail)	Mohave Co.		1	1995 Grand Cherokee	
03/13/01 ^F	FARS	Mohave Co.		2	1994 Grand Cherokee	
11/26/06*†(1)	FARS	Surprise		1	1995 Grand Cherokee	
Arkansas						
09/14/04*†(1)	FARS	Carroll Co.		2	1999 Grand Cherokee	
California						
03/06/96*†(1)	FARS	Indio		2	1993 Grand Cherokee	
03/16/96 ^F †(5)	FARS	Carson		5	1996 Grand Cherokee	
07/07/96 ^F †(1)	FARS	Poway		1	1993 Grand Cherokee	
06/14/98**†(1)	FARS (barrier)	Victorville		1	1993 Grand Cherokee	
10/27/99 ^F	Young Sup Lee	Los Angeles		1	1998 Grand Cherokee	
05/07/00 ^F	FARS	Orange Co.		1	1993 Grand Cherokee	
07/20/01 ^F	FARS	San Bernardino Co.		1	1994 Grand Cherokee	
08/07/01**	FARS (tree)	Los Gatos		1	1998 Grand Cherokee	
03/23/02*†(1)	FARS	Sutter Co.		2	1995 Grand Cherokee	
07/13/02**	FARS	San Luis Obispo Co.		1	2000 Grand Cherokee	
08/30/02 ^F	FARS	Bakersfield		1	1993 Grand Cherokee	
10/11/02**	FARS (overturn)	Fresno Co.		1	1993 Grand Cherokee	
10/04/03*	FARS	Anaheim		2	2004 Grand Cherokee	
11/27/03**	FARS (utility pole)	Commerce		1	1996 Grand Cherokee	
02/05/04*	FARS	San Bernardino Co.		1	1995 Grand Cherokee	
05/26/04***†(2)	FARS (overturn)	Vacaville		4	2004 Grand Cherokee	
06/08/04**	FARS (parked vehicle)	Riverside Co.		1	1997 Grand Cherokee	
08/18/05 ^F	James Lindskog	Oceanside		1	1994 Grand Cherokee	
05/24/06 ^F †(1)	FARS	Orange Co.		2	2001 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
06/25/06**	FARS (tree)	Sonoma Co.		1	1993 Grand Cherokee	
Colorado						
07/24/94*	FARS	Denver		1	1994 Grand Cherokee	
09/02/02**	FARS (overturn)	Douglas Co.		1	1993 Grand Cherokee	
01/10/05 ^F	FARS	Mesa Co.		1	2004 Grand Cherokee	
07/06/08**	FARS (boulder)	Garfield Co.		1	1997 Grand Cherokee	
Connecticut						
04/10/97**	FARS (tree)	Washington		1	1994 Grand Cherokee	
04/19/02**	FARS (tree)	Hamden		1	1994 Grand Cherokee	
Delaware						
09/11/03*	FARS	Sussex Co.		1	1993 Grand Cherokee	
D.C.						
Florida						
11/16/98*†(2)	FARS	Hillsborough Co.		2	1998 Grand Cherokee	
11/17/01**	FARS (overturn)	Jacksonville		1	1996 Grand Cherokee	
09/05/07 ^F	FARS	N/A		2	1998 Grand Cherokee	
Georgia						
12/04/97*	FARS	Wilkes Co.		1	1997 Grand Cherokee	
07/14/98*	FARS	Echols Co.		3	1993 Grand Cherokee	
12/13/98**	FARS (tree)	Forsyth Co.		1	1996 Grand Cherokee	
05/30/99**	FARS (embankment)	Jones Co.		2	1994 Grand Cherokee	
08/13/01**	FARS (barrier)	DeKalb Co.		1	1998 Grand Cherokee	
10/30/04*†(4)	FARS	Tift Co.		4	1999 Grand Cherokee	
03/08/05 ^F	FARS	Paulding Co.		1	1999 Grand Cherokee	
03/09/05 ^F	FARS	Macon Co.		1	1997 Grand Cherokee	
03/24/05*	FARS	Barrow Co.		1	1993 Grand Cherokee	
06/20/06*	FARS	Polk		1	2003 Grand Cherokee	
09/04/07**	FARS (overturn)	McDuffie Co.		1	1998 Grand Cherokee	
Illinois						
09/04/00 ^F	Nguyen, Bui, Vo, Prith	Chicago		6	1993 Grand Cherokee	
03/02/01*	FARS	Elk Grove Village		1	1998 Grand Cherokee	
08/12/02**	FARS (tree)	Barrington Hills		1	1998 Grand Cherokee	
03/16/03*	FARS	Livingston Co.		1	1994 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
06/25/06**	FARS (tree)	Sonoma Co.		1	1993 Grand Cherokee	
Colorado						
07/24/94*	FARS	Denver		1	1994 Grand Cherokee	
09/02/02**	FARS (overturn)	Douglas Co.		1	1993 Grand Cherokee	
01/10/05 ^F	FARS	Mesa Co.		1	2004 Grand Cherokee	
07/06/08**	FARS (boulder)	Garfield Co.		1	1997 Grand Cherokee	
Connecticut						
04/10/97**	FARS (tree)	Washington		1	1994 Grand Cherokee	
04/19/02**	FARS (tree)	Hamden		1	1994 Grand Cherokee	
Delaware						
09/11/03*	FARS	Sussex Co.		1	1993 Grand Cherokee	
D.C.						
Florida						
11/16/98*†(2)	FARS	Hillsborough Co.		2	1998 Grand Cherokee	
11/17/01**	FARS (overturn)	Jacksonville		1	1996 Grand Cherokee	
09/05/07 ^F	FARS	N/A		2	1998 Grand Cherokee	
Georgia						
12/04/97*	FARS	Wilkes Co.		1	1997 Grand Cherokee	
07/14/98*	FARS	Echols Co.		3	1993 Grand Cherokee	
12/13/98**	FARS (tree)	Forsyth Co.		1	1996 Grand Cherokee	
05/30/99**	FARS (embankment)	Jones Co.		2	1994 Grand Cherokee	
08/13/01**	FARS (barrier)	DeKalb Co.		1	1998 Grand Cherokee	
10/30/04*†(4)	FARS	Tift Co.		4	1999 Grand Cherokee	
03/08/05 ^F	FARS	Paulding Co.		1	1999 Grand Cherokee	
03/09/05 ^F	FARS	Macon Co.		1	1997 Grand Cherokee	
03/24/05*	FARS	Barrow Co.		1	1993 Grand Cherokee	
06/20/06*	FARS	Polk		1	2003 Grand Cherokee	
09/04/07**	FARS (overturn)	McDuffie Co.		1	1998 Grand Cherokee	
Illinois						
09/04/00 ^F	Nguyen, Bui, Vo, Prith	Chicago		6	1993 Grand Cherokee	
03/02/01*	FARS	Elk Grove Village		1	1998 Grand Cherokee	
08/12/02**	FARS (tree)	Barrington Hills		1	1998 Grand Cherokee	
03/16/03*	FARS	Livingston Co.		1	1994 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
10/11/03*†(1)	FARS	Union Co.		2	1996 Grand Cherokee	
02/16/04*	FARS	Kankakee Co.		2	1999 Grand Cherokee	
06/02/05*†(1)	FARS	Coles Co.		2	1999 Grand Cherokee	
10/23/05*†(1)	FARS	Iroquois Co.		1	1998 Grand Cherokee	
01/04/06*†(1)	FARS	South Elgin		2	2001 Grand Cherokee	
03/18/07**	FARS (overturn)	Du Page Co.		2	1995 Grand Cherokee	
10/16/07 ^F	FARS	La Salle Co.		2	1993 Grand Cherokee	
Indiana						
04/27/98*†(1)	FARS	Clay Co.		3	1997 Grand Cherokee	
09/16/04 ^F	FARS	Warrick Co.		1	2004 Grand Cherokee	
11/13/04 ^F	FARS	Noble Co.		4	1997 Grand Cherokee	
10/10/08**	FARS (tree)	Taylorsville		1	1994 Grand Cherokee	
Iowa						
09/07/01**	FARS (overturn)	Patterson		1	2001 Grand Cherokee	
Kentucky						
02/13/00 ^F	FARS	Bourbon Co.		1	1997 Grand Cherokee	
08/07/06*†(1)	FARS	Boone Co.		1	1998 Grand Cherokee	
Louisiana						
08/31/00*	FARS	Livingston Co.		1	1997 Grand Cherokee	
12/10/00*	FARS	St. Martin Co.		2	1997 Grand Cherokee	
07/20/03 ^F †(3)	FARS	St. Martin Co.		5	2000 Grand Cherokee	
07/16/04**	FARS (utility pole)	Bossier City		2	1999 Grand Cherokee	
10/09/04**	FARS (tree)	Franklin Co.		1	1995 Grand Cherokee	
Maryland						
11/29/98*	FARS	Baltimore Co.		2	1993 Grand Cherokee	
Massachusetts						
03/04/07**	FARS (overturn)	Centerville		2	2004 Grand Cherokee	
04/29/07**	FARS (tree)	South Easton		1	1993 Grand Cherokee	
Michigan						
12/04/97*	FARS	Dickinson Co.		1	1994 Grand Cherokee	
01/03/03**	FARS (tree)	Ottawa Co.		1	1993 Grand Cherokee	
04/30/05 ^F †(1)	FARS	Oakland Co.		3	2004 Grand Cherokee	
08/16/08**	FARS (overturn)	Kalkaska Co.		1	1996 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
10/11/03*†(1)	FARS	Union Co.		2	1996 Grand Cherokee	
02/16/04*	FARS	Kankakee Co.		2	1999 Grand Cherokee	
06/02/05*†(1)	FARS	Coles Co.		2	1999 Grand Cherokee	
10/23/05*†(1)	FARS	Iroquois Co.		1	1998 Grand Cherokee	
01/04/06*†(1)	FARS	South Elgin		2	2001 Grand Cherokee	
03/18/07**	FARS (overturn)	Du Page Co.		2	1995 Grand Cherokee	
10/16/07 ^h	FARS	La Salle Co.		2	1993 Grand Cherokee	
Indiana						
04/27/98*†(1)	FARS	Clay Co.		3	1997 Grand Cherokee	
09/16/04 ^h	FARS	Warrick Co.		1	2004 Grand Cherokee	
11/13/04 ^h	FARS	Noble Co.		4	1997 Grand Cherokee	
10/10/08**	FARS (tree)	Taylorsville		1	1994 Grand Cherokee	
Iowa						
09/07/01**	FARS (overturn)	Patterson		1	2001 Grand Cherokee	
Kentucky						
02/13/00 ^h	FARS	Bourbon Co.		1	1997 Grand Cherokee	
08/07/06*†(1)	FARS	Boone Co.		1	1998 Grand Cherokee	
Louisiana						
08/31/00*	FARS	Livingston Co.		1	1997 Grand Cherokee	
12/10/00*	FARS	St. Martin Co.		2	1997 Grand Cherokee	
07/20/03 ^h †(3)	FARS	St. Martin Co.		5	2000 Grand Cherokee	
07/16/04**	FARS (utility pole)	Bossier City		2	1999 Grand Cherokee	
10/09/04**	FARS (tree)	Franklin Co.		1	1995 Grand Cherokee	
Maryland						
11/29/98*	FARS	Baltimore Co.		2	1993 Grand Cherokee	
Massachusetts						
03/04/07**	FARS (overturn)	Centerville		2	2004 Grand Cherokee	
04/29/07**	FARS (tree)	South Easton		1	1993 Grand Cherokee	
Michigan						
12/04/97*	FARS	Dickinson Co.		1	1994 Grand Cherokee	
01/03/03**	FARS (tree)	Ottawa Co.		1	1993 Grand Cherokee	
04/30/05 ^h †(1)	FARS	Oakland Co.		3	2004 Grand Cherokee	
08/16/08**	FARS (overturn)	Kalkaska Co.		1	1996 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Minnesota						
02/09/98*	FARS	Carlton Co.		1	1994 Grand Cherokee	
11/15/98*†(1)	FARS	Maple Grove		1	1993 Grand Cherokee	
11/03/02*	FARS	Scott Co.		1	2001 Grand Cherokee	
04/15/03*	FARS	Aitkin Co.		1	2000 Grand Cherokee	
07/14/03*†(1)	FARS	Maple Grove		1	1993 Grand Cherokee	
12/29/03**	FARS (overturn)	Lac Qui Parle Co.		1	1995 Grand Cherokee	
06/06/04**	FARS (overturn)	Washington Co.		1	1999 Grand Cherokee	
05/24/05**	FARS (overturn)	Carver Co.		4	1994 Grand Cherokee	
01/27/06*	FARS	Brown Co.		1	2004 Grand Cherokee	
03/21/08*†(1)	FARS	St. Louis Co.		2	1995 Grand Cherokee	
Mississippi						
12/27/99*	FARS	Hancock Co.		3	1995 Grand Cherokee	
10/08/05**	FARS (tree)	Tishomingo Co.		1	1999 Grand Cherokee	
Missouri						
11/13/98**	FARS (overturn)	Gasconade Co.		1	1996 Grand Cherokee	
01/23/00*†(7)	FARS	Platte Co.		10	1996 Grand Cherokee	
12/03/00**	FARS (tree)	Greene Co.		3	1995 Grand Cherokee	
08/02/02*†(1)	FARS	Camden Co.		1	1996 Grand Cherokee	
09/04/02*†(1)	FARS	Maryland Heights		1	1997 Grand Cherokee	
11/17/02**	FARS (tree)	Kansas City		1	1995 Grand Cherokee	
06/05/04**	FARS (overturn)	St. Louis		1	1995 Grand Cherokee	
06/14/06*	FARS	Kennett		1	1997 Grand Cherokee	
02/01/08*†(1)	FARS	Osage Co.		1	1997 Grand Cherokee	
Nebraska						
12/19/06 ^P †(1)	FARS	Pierce Co.		1	2000 Grand Cherokee	
06/24/08**	FARS (overturn)	Dawes Co.		1	1998 Grand Cherokee	
Nevada						
New Hampshire						
07/21/00*†(1)	FARS	Hampton		1	1994 Grand Cherokee	
New Jersey						
01/05/01**	FARS (other object)	Gloucester Co.		1	1996 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Minnesota						
02/09/98*	FARS	Carlton Co.		1	1994 Grand Cherokee	
11/15/98*†(1)	FARS	Maple Grove		1	1993 Grand Cherokee	
11/03/02*	FARS	Scott Co.		1	2001 Grand Cherokee	
04/15/03*	FARS	Aitkin Co.		1	2000 Grand Cherokee	
07/14/03*†(1)	FARS	Maple Grove		1	1993 Grand Cherokee	
12/29/03**	FARS (overturn)	Lac Qui Parle Co.		1	1995 Grand Cherokee	
06/06/04**	FARS (overturn)	Washington Co.		1	1999 Grand Cherokee	
05/24/05**	FARS (overturn)	Carver Co.		4	1994 Grand Cherokee	
01/27/06*	FARS	Brown Co.		1	2004 Grand Cherokee	
03/21/08*†(1)	FARS	St. Louis Co.		2	1995 Grand Cherokee	
Mississippi						
12/27/99*	FARS	Hancock Co.		3	1995 Grand Cherokee	
10/08/05**	FARS (tree)	Tishomingo Co.		1	1999 Grand Cherokee	
Missouri						
11/13/98**	FARS (overturn)	Gasconade Co.		1	1996 Grand Cherokee	
01/23/00*†(7)	FARS	Platte Co.		10	1996 Grand Cherokee	
12/03/00**	FARS (tree)	Greene Co.		3	1995 Grand Cherokee	
08/02/02*†(1)	FARS	Camden Co.		1	1996 Grand Cherokee	
09/04/02*†(1)	FARS	Maryland Heights		1	1997 Grand Cherokee	
11/17/02**	FARS (tree)	Kansas City		1	1995 Grand Cherokee	
06/05/04**	FARS (overturn)	St. Louis		1	1995 Grand Cherokee	
06/14/06*	FARS	Kennett		1	1997 Grand Cherokee	
02/01/08*†(1)	FARS	Osage Co.		1	1997 Grand Cherokee	
Nebraska						
12/19/06 ^F †(1)	FARS	Pierce Co.		1	2000 Grand Cherokee	
06/24/08**	FARS (overturn)	Dawes Co.		1	1998 Grand Cherokee	
Nevada						
New Hampshire						
07/21/00*†(1)	FARS	Hampton		1	1994 Grand Cherokee	
New Jersey						
01/05/01**	FARS (other object)	Gloucester Co.		1	1996 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
09/23/05**	FARS (parked veh.)	Union		1	1998 Grand Cherokee	
03/31/06*	FARS	Mansfield		1	1999 Grand Cherokee	
02/24/07 ^F	FARS	Parsippany		1	1996 Grand Cherokee	
New Mexico						
03/08/02*†(7)	FARS	Guadalupe Co.		7	1999 Grand Cherokee	
New York						
08/21/99 ^F	FARS	Henrietta		1	1996 Grand Cherokee	
09/01/99*†(1)	FARS	Southampton		1	1997 Grand Cherokee	
09/02/99**	FARS (overturn)	East Moriches		1	1997 Grand Cherokee	
12/19/02**	FARS (parked veh.)	Yonkers		1	2002 Grand Cherokee	
03/14/04*†(1)	FARS	Wyoming Co.		1	1993 Grand Cherokee	
08/14/04**†(1)	FARS (overturn)	Palmyra		1	1994 Grand Cherokee	
12/17/06 ^F	FARS	Greenfield Center		1	1996 Grand Cherokee	
08/15/07 ^F	FARS	Duanesburg		1	1993 Grand Cherokee	
06/19/08 ^F	FARS	Churubusco		1	2004 Grand Cherokee	
North Carolina						
12/19/99**	FARS (tree)	Columbus Co.		1	1994 Grand Cherokee	
03/09/02*†(2)	FARS	Nash Co.		2	1998 Grand Cherokee	
North Dakota						
07/24/06**	FARS (overturn)	Stark Co.		1	1993 Grand Cherokee	
Ohio						
07/30/95**	FARS (culvert)	Hilliard		1	1993 Grand Cherokee	
09/26/97 ^F	FARS	Wood Co.		1	1993 Grand Cherokee	
09/05/98*	FARS	Delaware Co.		1	1996 Grand Cherokee	
12/17/98*	FARS	Guernsey Co.		1	1993 Grand Cherokee	
11/23/99*†(2)	FARS	Tuscarawas Co.		2	1996 Grand Cherokee	
03/24/01**	FARS (tree)	Chillicothe		1	1996 Grand Cherokee	
06/29/02*	FARS	Sandusky Co.		1	1997 Grand Cherokee	
05/28/03*†(1)	FARS	Lawrence Co.		1	1998 Grand Cherokee	
11/29/03*	FARS	Lakeview		1	1999 Grand Cherokee	
Oklahoma						
05/26/01 ^F †(1)	FARS	Oklahoma City		2	1993 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
09/23/05**	FARS (parked veh.)	Union		1	1998 Grand Cherokee	
03/31/06*	FARS	Mansfield		1	1999 Grand Cherokee	
02/24/07 ^F	FARS	Parsippany		1	1996 Grand Cherokee	
New Mexico						
03/08/02*†(7)	FARS	Guadalupe Co.		7	1999 Grand Cherokee	
New York						
08/21/99 ^F	FARS	Henrietta		1	1996 Grand Cherokee	
09/01/99*†(1)	FARS	Southampton		1	1997 Grand Cherokee	
09/02/99**	FARS (overturn)	East Moriches		1	1997 Grand Cherokee	
12/19/02**	FARS (parked veh.)	Yonkers		1	2002 Grand Cherokee	
03/14/04*†(1)	FARS	Wyoming Co.		1	1993 Grand Cherokee	
08/14/04**†(1)	FARS (overturn)	Palmyra		1	1994 Grand Cherokee	
12/17/06 ^F	FARS	Greenfield Center		1	1996 Grand Cherokee	
08/15/07 ^F	FARS	Duanesburg		1	1993 Grand Cherokee	
06/19/08 ^F	FARS	Churubusco		1	2004 Grand Cherokee	
North Carolina						
12/19/99**	FARS (tree)	Columbus Co.		1	1994 Grand Cherokee	
03/09/02*†(2)	FARS	Nash Co.		2	1998 Grand Cherokee	
North Dakota						
07/24/06**	FARS (overturn)	Stark Co.		1	1993 Grand Cherokee	
Ohio						
07/30/95**	FARS (culvert)	Hilliard		1	1993 Grand Cherokee	
09/26/97 ^F	FARS	Wood Co.		1	1993 Grand Cherokee	
09/05/98*	FARS	Delaware Co.		1	1996 Grand Cherokee	
12/17/98*	FARS	Guernsey Co.		1	1993 Grand Cherokee	
11/23/99*†(2)	FARS	Tuscarawas Co.		2	1996 Grand Cherokee	
03/24/01**	FARS (tree)	Chillicothe		1	1996 Grand Cherokee	
06/29/02*	FARS	Sandusky Co.		1	1997 Grand Cherokee	
05/28/03*†(1)	FARS	Lawrence Co.		1	1998 Grand Cherokee	
11/29/03*	FARS	Lakeview		1	1999 Grand Cherokee	
Oklahoma						
05/26/01 ^F †(1)	FARS	Oklahoma City		2	1993 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #		
Oregon								
09/22/95*	FARS	Grant Co.		1	1993 Grand Cherokee			
09/20/97**	FARS (overturn)			2	1994 Grand Cherokee			
Pennsylvania								
10/24/98**	FARS (tree)	Franklin Co.		2	1998 Grand Cherokee			
03/05/00 ^F	FARS	Bucks Co.		1	1993 Grand Cherokee			
09/21/03*†(1)	FARS	Clinton Co.		2	1994 Grand Cherokee			
02/27/04*	FARS	York Co.		2	2000 Grand Cherokee			
07/03/05**	FARS (tree)	Philadelphia		1	1993 Grand Cherokee			
04/05/06**	FARS (overturn)	Clarion Co.		1	1995 Grand Cherokee			
11/30/06*	FARS	Warren Co.		1	1995 Grand Cherokee			
11/12/07*†(1)	FARS	Lackawanna Co.		1	2000 Grand Cherokee			
02/16/08**	FARS (tree)	Erie Co.		1	2002 Grand Cherokee			
Rhode Island								
07/12/02**	FARS (tree)	Scituate		1	1998 Grand Cherokee			
South Carolina								
08/06/99 ^F	FARS	Marlboro Co.		2	1993 Grand Cherokee			
05/21/00 ^F	FARS	Hampton		1	1994 Grand Cherokee			
04/25/05*	FARS	Richland Co.		1	1998 Grand Cherokee			
07/07/08 ^F	FARS	Georgetown Co.		1	1996 Grand Cherokee			
South Dakota								
03/23/07**	FARS (overturn)	Moody Co.	1	1998 Grand Cherokee				
Tennessee								
08/31/01 ^F	FARS	Jackson	1	1999 Grand Cherokee				
08/31/02 ^F	FARS	Lawrence Co.	1	1994 Grand Cherokee				
05/29/04 ^F	FARS	Germantown	1	1996 Grand Cherokee				
08/01/05**	FARS (bridge pier)	Kingsport	1	1997 Grand Cherokee				
11/18/06*†(1)	FARS	Wilson Co.	1	1998 Grand Cherokee				
12/16/06**	FARS (tree)	Mount Juliet	1	1999 Grand Cherokee				
Texas								

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Oregon						
09/22/95*	FARS	Grant Co.		1	1993 Grand Cherokee	
09/20/97**	FARS (overturn)			2	1994 Grand Cherokee	
Pennsylvania						
10/24/98**	FARS (tree)	Franklin Co.		2	1998 Grand Cherokee	
03/05/00 ^F	FARS	Bucks Co.		1	1993 Grand Cherokee	
09/21/03*†(1)	FARS	Clinton Co.		2	1994 Grand Cherokee	
02/27/04*	FARS	York Co.		2	2000 Grand Cherokee	
07/03/05**	FARS (tree)	Philadelphia		1	1993 Grand Cherokee	
04/05/06**	FARS (overturn)	Clarion Co.		1	1995 Grand Cherokee	
11/30/06*	FARS	Warren Co.		1	1995 Grand Cherokee	
11/12/07*†(1)	FARS	Lackawanna Co.		1	2000 Grand Cherokee	
02/16/08**	FARS (tree)	Erie Co.		1	2002 Grand Cherokee	
Rhode Island						
07/12/02**	FARS (tree)	Scituate		1	1998 Grand Cherokee	
South Carolina						
08/06/99 ^F	FARS	Marlboro Co.		2	1993 Grand Cherokee	
05/21/00 ^F	FARS	Hampton		1	1994 Grand Cherokee	
04/25/05*	FARS	Richland Co.		1	1998 Grand Cherokee	
07/07/08 ^F	FARS	Georgetown Co.		1	1996 Grand Cherokee	
South Dakota						
03/23/07**	FARS (overturn)	Moody Co.		1	1998 Grand Cherokee	
Tennessee						
08/31/01 ^F	FARS	Jackson		1	1999 Grand Cherokee	
08/31/02 ^F	FARS	Lawrence Co.		1	1994 Grand Cherokee	
05/29/04 ^F	FARS	Germantown		1	1996 Grand Cherokee	
08/01/05**	FARS (bridge pier)	Kingsport		1	1997 Grand Cherokee	
11/18/06*†(1)	FARS	Wilson Co.		1	1998 Grand Cherokee	
12/16/06**	FARS (tree)	Mount Juliet		1	1999 Grand Cherokee	
Texas						

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
06/22/97*	FARS	Cass Co.		1	1996 Grand Cherokee	
01/16/98 ^F	FARS	Brazoria Co.		1	1994 Grand Cherokee	
11/11/00**	FARS (tree)	Gonzales Co.		1	1997 Grand Cherokee	
06/09/04 ^F	FARS	Victoria Co.		1	2002 Grand Cherokee	
12/12/04*†(1)	FARS	Dallas		1	1998 Grand Cherokee	
08/06/05 ^F	FARS	Bullard		1	1996 Grand Cherokee	
04/28/06*	FARS	Dallas		2	2000 Grand Cherokee	
Vermont						
04/10/00*	FARS	Swanton		1	1998 Grand Cherokee	
09/11/08*	FARS	Waterbury		1	1998 Grand Cherokee	
Virginia						
08/08/03*	FARS	Washington Co.		1	1998 Grand Cherokee	
Washington						
03/15/06**	FARS (tree)	Auburn		2	1995 Grand Cherokee	
West Virginia						
12/06/03**	FARS (tree)	Kanawha Co.		1	1994 Grand Cherokee	
09/30/06 ^F	FARS	Charleston		1	1998 Grand Cherokee	
Wisconsin						
05/18/03 ^F	FARS	Grant Co.		1	1996 Grand Cherokee	
07/03/04**	FARS (tree)	Columbia		1	1995 Grand Cherokee	
07/03/07 ^F	FARS	Nashotah		1	2001 Grand Cherokee	
09/09/07**	FARS (overtum)	Greenfield		1	1994 Grand Cherokee	
Wyoming						
04/04/03*	FARS	Converse Co.		1	1993 Grand Cherokee	

^F Indicated in FARS as most harmful: "fire/explosion."

* Indicated in FARS as most harmful: "motor vehicle in transport" or "motor vehicle in transport in other roadway."

** Item in parentheses is most harmful event as indicated in FARS.

^{F-A} Fire listed as cause of in autopsy report or certificate

^{F-L} Fire indicated as cause of in litigation.

^{F-R} Fire indicated as cause of in accident report.

† Fatality(s) (#) occurred in bullet vehicle

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS
06/22/97*	FARS	Cass Co.		1	1996 Grand Cherokee	
01/16/98 ^F	FARS	Brazoria Co.		1	1994 Grand Cherokee	
11/11/00**	FARS (tree)	Gonzales Co.		1	1997 Grand Cherokee	
06/09/04 ^F	FARS	Victoria Co.		1	2002 Grand Cherokee	
12/12/04*†(1)	FARS	Dallas		1	1998 Grand Cherokee	
08/06/05 ^F	FARS	Bullard		1	1996 Grand Cherokee	
04/28/06*	FARS	Dallas		2	2000 Grand Cherokee	
Vermont						
04/10/00*	FARS	Swanton		1	1998 Grand Cherokee	
09/11/08*	FARS	Waterbury		1	1998 Grand Cherokee	
Virginia						
08/08/03*	FARS	Washington Co.		1	1998 Grand Cherokee	
Washington						
03/15/06**	FARS (tree)	Auburn		2	1995 Grand Cherokee	
West Virginia						
12/06/03**	FARS (tree)	Kanawha Co.		1	1994 Grand Cherokee	
09/30/06 ^F	FARS	Charleston		1	1998 Grand Cherokee	
Wisconsin						
05/18/03 ^F	FARS	Grant Co.		1	1996 Grand Cherokee	
07/03/04**	FARS (tree)	Columbia		1	1995 Grand Cherokee	
07/03/07 ^F	FARS	Nashotah		1	2001 Grand Cherokee	
09/09/07**	FARS (overturn)	Greenfield		1	1994 Grand Cherokee	
Wyoming						
04/04/03*	FARS	Converse Co.		1	1993 Grand Cherokee	

^F Indicated in FARS as most harmful: "fire/explosion."

* Indicated in FARS as most harmful: "motor vehicle in transport" or "motor vehicle in transport in other roadway."

** Item in parentheses is most harmful event as indicated in FARS.

^{F-A} Fire listed as cause of in autopsy report or certificate

^{F-L} Fire indicated as cause of in litigation.

^{F-R} Fire indicated as cause of in accident report.

† Fatality(s) (#) occurred in bullet vehicle

Attachment B
MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes with Fire/Explosion as Most
Harmful Event, 1992-2008

Attachment B
MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes with Fire/Explosion as Most
Harmful Event, 1992-2008

MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes with Most Harmful Event as Fire/Explosion, 1992-2008

This table includes known fire crashes where fire/explosion is listed as Most Harmful Event, obtained from NHTSA's Fatal Analysis Crash System (FARS) for Calendar Years 1992-2008 and from public records for other years and for crashes not listed in FARS.

MY 1993-2008 Jeep Grand Cherokee Fatal Fire Crashes with Most Harmful Event as Fire/Explosion, 1992-2008

This table includes known fire crashes where fire/explosion is listed as Most Harmful Event, obtained from NHTSA's Fatal Analysis Crash System (FARS) for Calendar Years 1992-2008 and from public records for other years and for crashes not listed in FARS.

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Alabama						
04/12/06 ^F	FARS	Montgomery		1	2004 Grand Cherokee	
04/25/07 ^F	FARS	Macon Co.		1	1993 Grand Cherokee	
Arizona						
02/01/98 ^F	FARS	Gila Co.		1	1993 Grand Cherokee	
03/13/01 ^F	FARS	Mohave Co.		2	1994 Grand Cherokee	
California						
03/16/96 ^F †(5)	FARS	Carson		5	1996 Grand Cherokee	
07/07/96 ^F †(1)	FARS	Poway		1	1993 Grand Cherokee	
10/27/99 ^F	FARS	Los Angeles		1	1998 Grand Cherokee	
05/07/00 ^F	FARS	Orange Co.		1	1993 Grand Cherokee	
07/20/01 ^F	FARS	San Bernardino Co.		1	1994 Grand Cherokee	
08/30/02 ^F	FARS	Bakersfield		1	1993 Grand Cherokee	
08/18/05 ^F	FARS	Oceanside		1	1994 Grand Cherokee	
05/24/06 ^F †(1)	FARS	Orange Co.		2	2001 Grand Cherokee	
Colorado						
01/10/05 ^F	FARS	Mesa Co.		1	2004 Grand Cherokee	
Florida						
09/05/07 ^F	FARS	N/A		2	1998 Grand Cherokee	
Georgia						
03/08/05 ^F	FARS	Paulding Co.		1	1999 Grand Cherokee	
03/09/05 ^F	FARS	Macon Co.		1	1997 Grand Cherokee	
Illinois						
09/04/00 ^F	FARS	Chicago		6	1993 Grand Cherokee	
10/16/07 ^F	FARS	La Salle Co.		2	1993 Grand Cherokee	
Indiana						
09/16/04 ^F	FARS	Warrick Co.		1	2004 Grand Cherokee	
11/13/04 ^F	FARS	Noble Co.		4	1997 Grand Cherokee	
Kentucky						
02/13/00 ^F	FARS	Bourbon Co.		1	1997 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Alabama						
04/12/06 ^F	FARS	Montgomery		1	2004 Grand Cherokee	
04/25/07 ^F	FARS	Macon Co.		1	1993 Grand Cherokee	
Arizona						
02/01/98 ^F	FARS	Gila Co.		1	1993 Grand Cherokee	
03/13/01 ^F	FARS	Mohave Co.		2	1994 Grand Cherokee	
California						
03/16/96 ^F †(5)	FARS	Carson		5	1996 Grand Cherokee	
07/07/96 ^F †(1)	FARS	Poway		1	1993 Grand Cherokee	
10/27/99 ^F	FARS	Los Angeles		1	1998 Grand Cherokee	
05/07/00 ^F	FARS	Orange Co.		1	1993 Grand Cherokee	
07/20/01 ^F	FARS	San Bernardino Co.		1	1994 Grand Cherokee	
08/30/02 ^F	FARS	Bakersfield		1	1993 Grand Cherokee	
08/18/05 ^F	FARS	Oceanside		1	1994 Grand Cherokee	
05/24/06 ^F †(1)	FARS	Orange Co.		2	2001 Grand Cherokee	
Colorado						
01/10/05 ^F	FARS	Mesa Co.		1	2004 Grand Cherokee	
Florida						
09/05/07 ^F	FARS	N/A		2	1998 Grand Cherokee	
Georgia						
03/08/05 ^F	FARS	Paulding Co.		1	1999 Grand Cherokee	
03/09/05 ^F	FARS	Macon Co.		1	1997 Grand Cherokee	
Illinois						
09/04/00 ^F	FARS	Chicago		6	1993 Grand Cherokee	
10/16/07 ^F	FARS	La Salle Co.		2	1993 Grand Cherokee	
Indiana						
09/16/04 ^F	FARS	Warrick Co.		1	2004 Grand Cherokee	
11/13/04 ^F	FARS	Noble Co.		4	1997 Grand Cherokee	
Kentucky						
02/13/00 ^F	FARS	Bourbon Co.		1	1997 Grand Cherokee	

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Louisiana						
07/20/03 ^F †(3)	FARS	St. Martin Co.		5	2000 Grand Cherokee	
Michigan						
04/30/05 ^F †(1)	FARS	Oakland Co.		3	2004 Grand Cherokee	
Nebraska						
12/19/06 ^F †(1)	FARS	Pierce Co.		1	2000 Grand Cherokee	
New Jersey						
02/24/07 ^F	FARS	Parsippany		1	1996 Grand Cherokee	
New York						
08/21/99 ^F	FARS	Henrietta		1	1996 Grand Cherokee	
12/17/06 ^F	FARS	Greenfield Center		1	1996 Grand Cherokee	
08/15/07 ^F	FARS	Duanesburg		1	1993 Grand Cherokee	
06/19/08 ^F	FARS	Churubusco		1	2004 Grand Cherokee	
Ohio						
09/26/97 ^F	FARS	Wood Co.		1	1993 Grand Cherokee	
Oklahoma						
05/26/01 ^F †(1)	FARS	Oklahoma City		2	1993 Grand Cherokee	
Pennsylvania						
03/05/00 ^F	FARS	Bucks Co.		1	1993 Grand Cherokee	
South Carolina						
08/06/99 ^F	FARS	Marlboro Co.		2	1993 Grand Cherokee	
05/21/00 ^F	FARS	Hampton		1	1994 Grand Cherokee	
07/07/08 ^F	FARS	Georgetown Co.		1	1996 Grand Cherokee	
Tennessee						
08/31/01 ^F	FARS	Jackson		1	1999 Grand Cherokee	
08/31/02 ^F	FARS	Lawrence Co.		1	1994 Grand Cherokee	
05/29/04 ^F	FARS	Germantown		1	1996 Grand Cherokee	
Texas						

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
Louisiana						
07/20/03 ^{F†} (3)	FARS	St. Martin Co.		5	2000 Grand Cherokee	
Michigan						
04/30/05 ^{F†} (1)	FARS	Oakland Co.		3	2004 Grand Cherokee	
Nebraska						
12/19/06 ^{F†} (1)	FARS	Pierce Co.		1	2000 Grand Cherokee	
New Jersey						
02/24/07 ^F	FARS	Parsippany		1	1996 Grand Cherokee	
New York						
08/21/99 ^F	FARS	Henrietta		1	1996 Grand Cherokee	
12/17/06 ^F	FARS	Greenfield Center		1	1996 Grand Cherokee	
08/15/07 ^F	FARS	Duanesburg		1	1993 Grand Cherokee	
06/19/08 ^F	FARS	Churubusco		1	2004 Grand Cherokee	
Ohio						
09/26/97 ^F	FARS	Wood Co.		1	1993 Grand Cherokee	
Oklahoma						
05/26/01 ^{F†} (1)	FARS	Oklahoma City		2	1993 Grand Cherokee	
Pennsylvania						
03/05/00 ^F	FARS	Bucks Co.		1	1993 Grand Cherokee	
South Carolina						
08/06/99 ^F	FARS	Marlboro Co.		2	1993 Grand Cherokee	
05/21/00 ^F	FARS	Hampton		1	1994 Grand Cherokee	
07/07/08 ^F	FARS	Georgetown Co.		1	1996 Grand Cherokee	
Tennessee						
08/31/01 ^F	FARS	Jackson		1	1999 Grand Cherokee	
08/31/02 ^F	FARS	Lawrence Co.		1	1994 Grand Cherokee	
05/29/04 ^F	FARS	Germantown		1	1996 Grand Cherokee	
Texas						

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS #
01/16/98 ^F	FARS	Brazoria Co.	[REDACTED]	1	1994 Grand Cherokee	[REDACTED]
06/09/04 ^F	FARS	Victoria Co.		1	2002 Grand Cherokee	
08/06/05 ^F	FARS	Bullard		1	1996 Grand Cherokee	
West Virginia						
09/30/06 ^F	FARS	Charleston		1	1998 Grand Cherokee	
Wisconsin						
05/18/03 ^F	FARS	Grant Co.		1	1996 Grand Cherokee	
07/03/07 ^F	FARS	Nashotah	1	2001 Grand Cherokee		
				68		

^F Indicated in FARS as most harmful: "fire/explosion."

† Fatality(s) (#) occurred in other vehicle(s).

Crash Date by State	Name	City/County	Road	Deaths	Make/Model/Year	FARS
01/16/98 ^F	FARS	Brazoria Co.	[REDACTED]	1	1994 Grand Cherokee	[REDACTED]
06/09/04 ^F	FARS	Victoria Co.		1	2002 Grand Cherokee	
08/06/05 ^F	FARS	Bullard		1	1996 Grand Cherokee	
West Virginia						
09/30/06 ^F	FARS	Charleston		1	1998 Grand Cherokee	
Wisconsin						
05/18/03 ^F	FARS	Grant Co.		1	1996 Grand Cherokee	
07/03/07 ^F	FARS	Nashotah		1	2001 Grand Cherokee	
				68		

^F Indicated in FARS as most harmful: "fire/explosion."

† Fatality(s) (#) occurred in other vehicle(s).

Claim	Category	Cause	Owner/Fleet Name
[REDACTED]	Consumer Complaint	Although there was a report of a rear impact collision and fire,	REDACTED
[REDACTED]	Consumer Complaint	Although there was a report of a rear impact collision and fire,	REDACTED
[REDACTED]	Consumer Complaint	Although there was a report of a rear impact collision and fire,	REDACTED
[REDACTED]	Consumer Complaint	Although there was a report of a rear impact collision and fire,	REDACTED
[REDACTED]	Consumer Complaint	Although there was a report of a rear impact collision and fire,	REDACTED
[REDACTED]	Consumer Complaint	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Consumer Complaint	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Consumer Complaint	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Although there was a report of a rear impact collision and fire,	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED
[REDACTED]	Legal Claim	Chrysler Group has confirmed that there was a rear impact	REDACTED



Owner/feetAddress	Owner/feetPhone	VIN	Model Year	Mileage	IncidentDate	DateReported	File
REDACTED	REDACTED	1J4GZ78Y5WCXXXXXX	1998	66000	6/30/2002	09-Jul-02	TRUE
REDACTED	REDACTED	1J4GZ58V0SCXXXXXX	1995	NA	10/14/1996	11-Sep-97	TRUE
REDACTED	REDACTED	1J4GZ58S7VCXXXXXX	1997	13726	2/1/1998	03-Mar-98	TRUE
REDACTED	REDACTED	1J4FX48S7WCXXXXXX	1998	NA	10/27/1999	29-Oct-99	TRUE
REDACTED	REDACTED	1J4FX58S9TCXXXXXX	1996	40000	10/9/1999	01-Nov-99	TRUE
REDACTED	REDACTED	1J4GZ78SXTCXXXXXXX	1996	62000	8/3/2000	14-Aug-00	TRUE
REDACTED	REDACTED	1J4G248S8YCXXXXXXX	2000	10000	10/17/2000	24-Oct-00	TRUE
REDACTED	REDACTED	1J4GZ78S1PCXXXXXX	1993	NA	10/16/2007	16-Mar-09	TRUE
REDACTED	REDACTED	1J4G258S4XCXXXXXX	1999	NA	3/17/2007	15-Apr-08	TRUE
REDACTED	REDACTED	1J4GZ58S4PCXXXXXX	1993	NA	11/29/2000	17-Oct-02	TRUE
REDACTED	REDACTED	1J4GZ58S3VCXXXXXX	1997	NA	12/27/2000	06-Nov-01	TRUE
REDACTED	REDACTED	1J4GZ58S3VCXXXXXX	1997	NA	9/1/1999	10-Apr-00	TRUE
REDACTED	REDACTED	1J4GZ58S6PCXXXXXX	1993	NA	2/12/2006	20-Mar-07	TRUE
REDACTED	REDACTED	1J4GZ58S9TCXXXXXX	1996	NA	2/24/2007	15-Dec-08	TRUE
REDACTED	REDACTED	1J4FX58S9WCXXXXXX	1998	NA	3/1/2007	16-Apr-07	TRUE
REDACTED	REDACTED	1J4FX58S3TCXXXXXX	1996	NA	7/12/1999	06-Apr-00	TRUE
REDACTED	REDACTED	1J4GZ78YXPCXXXXXX	1993	NA	8/30/2002	26-May-04	TRUE
REDACTED	REDACTED	1J4G248S2YCXXXXXXX	2000	NA	4/28/2006	10-Aug-06	TRUE
REDACTED	REDACTED	1J4GZ58Y5RCXXXXXX	1994	NA	7/20/2001	26-Aug-02	TRUE
REDACTED	REDACTED	1J4FX78S2SCXXXXXX	1995	NA	10/6/2001	16-Apr-02	TRUE
REDACTED	REDACTED	1J4GZ58Y7RCXXXXXX	1994	NA	8/9/2006	18-Dec-07	TRUE
REDACTED	REDACTED	1J4GW48S31CXXXXXXX	2001	NA	7/3/2007	16-Jul-07	TRUE
REDACTED	REDACTED	1J4GW48SXX4CXXXXXXX	2004	NA	7/10/2009	29-Mar-10	TRUE

Owner/LeetAddress	Owner/LeetPhone	VIN	Model Year	Mileage	IncidentDate	DateReported	Fire
REDACTED	REDACTED	1J4GZ78Y5WCXXXXXX	1998	66000	6/30/2002	09-Jul-02	TRUE
REDACTED	REDACTED	1J4GZ58Y0SCXXXXXX	1995	NA	10/14/1996	11-Sep-97	TRUE
REDACTED	REDACTED	1J4GZ58S7VCXXXXXX	1997	13726	2/1/1998	03-Mar-98	TRUE
REDACTED	REDACTED	1J4FX48S7WCXXXXXX	1998	NA	10/27/1999	29-Oct-99	TRUE
REDACTED	REDACTED	1J4FX58S9TCXXXXXX	1996	40000	10/9/1999	01-Nov-99	TRUE
REDACTED	REDACTED	1J4GZ78SXTCXXXXXX	1996	62000	8/3/2000	14-Aug-00	TRUE
REDACTED	REDACTED	1J4GZ48S8YCXXXXXX	2000	10000	10/17/2000	24-Oct-00	TRUE
REDACTED	REDACTED	1J4GZ78S1PCXXXXXX	1993	NA	10/16/2007	16-Mar-09	TRUE
REDACTED	REDACTED	1J4GZ58S4XCXXXXXX	1999	NA	3/17/2007	15-Apr-08	TRUE
REDACTED	REDACTED	1J4GZ58S4PCXXXXXX	1993	NA	11/29/2000	17-Oct-02	TRUE
REDACTED	REDACTED	1J4GZ58S3VCXXXXXX	1997	NA	12/27/2000	06-Nov-01	TRUE
REDACTED	REDACTED	1J4GZ58S3VCXXXXXX	1997	NA	9/1/1999	10-Apr-00	TRUE
REDACTED	REDACTED	1J4GZ58S6PCXXXXXX	1993	NA	2/12/2006	20-Mar-07	TRUE
REDACTED	REDACTED	1J4GZ58S9TCXXXXXX	1996	NA	2/24/2007	15-Dec-08	TRUE
REDACTED	REDACTED	1J4FX58S9WCXXXXXX	1998	NA	3/1/2007	16-Apr-07	TRUE
REDACTED	REDACTED	1J4FX58S3TCXXXXXX	1996	NA	7/12/1999	06-Apr-00	TRUE
REDACTED	REDACTED	1J4GZ78YXPXXXXXX	1993	NA	8/30/2002	26-May-04	TRUE
REDACTED	REDACTED	1J4GZ48S2YCXXXXXX	2000	NA	4/28/2006	10-Aug-06	TRUE
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REDACTED	REDACTED	1J4GW48S31CXXXXXX	2001	NA	7/3/2007	16-Jul-07	TRUE
REDACTED	REDACTED	1J4GW48SX4CXXXXXX	2004	NA	7/10/2009	29-Mar-10	TRUE

Property/Damage	Injuries	Fatalities	Summary
FALSE	1	0	Please See Attached Report
FALSE	2	0	Please See Attached Report
FALSE	0	0	Please See Attached Report
FALSE	2	0	Please See Attached Report
FALSE	1	1	Please See Attached Report
FALSE	2	2	Please See Attached Report
FALSE	3	1	Please See Attached Report
FALSE	1	1	Please See Attached Report
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FALSE	2	1	Please See Attached Report
FALSE	2	1	Please See Attached Report
FALSE	2	0	Please See Attached Report
FALSE	2	0	Please See Attached Report


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FALSE	1	0	Please See Attached Report
FALSE	2	0	Please See Attached Report
FALSE	0	0	Please See Attached Report
FALSE	2	0	Please See Attached Report
FALSE	2	0	Please See Attached Report
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FALSE	0	0	Please See Attached Report
FALSE	2	0	Please See Attached Report
FALSE	1	0	Please See Attached Report

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JEOP WRANGLER FIRES

Did Jeep Offer An Owner 'Hush Money' To Keep Quiet About Fire Risk?

of Ann Arbor, Michigan was driving his 2010 Jeep Wrangler home when all of a sudden the brakes failed. Then his power steering went. Then he noticed smoke. Within a minute his car was surrounded by flames.

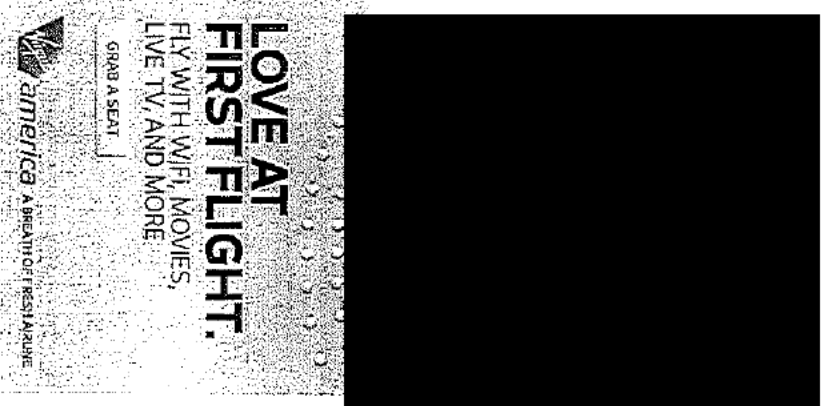
His was not the first late-model Jeep to catch fire, as a number of incidents of Wranglers experiencing massive system failures with no warning before bursting into flames have been reported to the Department of Transportation. Owners have also mentioned this issue on forums.

even claims he was offered more money than the value of his car — an amount Chrysler termed "generous" — in return for never discussing the matter publicly. So what's going on here?

"I was driving for about five minutes from a cold start near downtown — and it's unusually warm in Michigan so I wasn't running the A/C or anything — I was driving around 25-35 mph on a busy city street and the brakes failed — I noticed the light was turning yellow — I ran the red light because my brakes weren't stopping," explains.

"I thought my car stalled and I noticed the dash was still lit up," he says. "I see smoke coming up the dash and I see flames coming up the window."

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Watch A Policeman On Foot Pull Over A 220 MPH Supercar

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Feds Question Fisher Funding Efforts, Ford Is Junk No More, And Another Special Edition Bugatti Veyron

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QUESTION OF THE DAY
What's The Best Way To Become A Better Driver?

3,240



TRAINLOPNIK
Man Dies On Third Rail Trying To Pee On T Train Tracks

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SPACELOPNIK
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SAVE THE ERZOS
Police To Auction \$1.6 Million Ferrari Enzo Abandoned In Dubai

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For \$3,999, The Highlight Of This Hilux Is Its Huffer

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CAR SCIENCE
Why Haying To Pee While Driving Is As Bad As Drinking

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SECRET CARS
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FORMULA ONE
When Kosberg's Win, Pun Chaos Enrues

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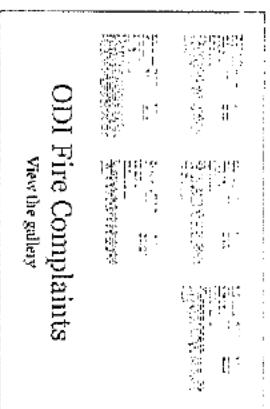
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█ was able to get the car off the road and bail before it was completely engulfed in flames. It took just a minute for the fire department to arrive but at that point it was too late.

█ situation isn't unique.



The 2008-2010 Jeep Wrangler — part of the JK series of Wranglers — has the unfortunate distinction of being an American vehicle that was banned from import by the Chinese government over fires, an issue Chrysler says it resolved.

At the time, Chrysler said they were aware of the fire and said they issued a recall in February 2010 to deal with an issue where transmission fluid could overheat under "extreme and/or abusive driving conditions under rigorous off-road conditions."

Chrysler in their statement went on to say that "Outside of China, Chrysler Group is not aware of any vehicle fires related to this condition once the recall was completed."

Except reports of fires have continued. A search of the National Highway Safety Traffic Administration's (NHTSA) Office of Defect Investigations (ODI) going back to October 2010 — eight months after the recall — shows five reports of 2010 MY Jeep Wranglers experiencing fires similar to █

One such report details the same sequence of events █ describes, specifically that mechanical systems failed but no fail lights turned on, followed by a fire.

2010 JEBP WRANGLER: ODI ID NUMBER █
A 2010 JEEP WRANGLER RUBICON CAUGHT ON FIRE ONLY 10,000 MILES. WE WERE RIDING DOWN THE ROAD AND THE ENGINE LOST POWER AND THE RPM'S WENT TO ZERO. THERE WAS NO CHECK ENGINES LIGHTS ON AND ALL THE GAUGES WERE FINE. WE PULLED OVER TO THE SIDE AND NOTICED THE SMOKE COMING FROM UNDER THE JEEP AND UNDER THE HOOD. THE FIRE DEPARTMENT SAID THEY THOUGHT IT WAS CAUSED BY A OVER HEATED TRANSMISSION AND MAYBE BACK THE FLUID UP TO THE EXHAUST WHICH IGNITED IT. THEY WERE NOT COMPLETELY SURE BECAUSE THE ENGINE WAS MELTED SO BADLY.

Beyond the ODI database there are also individuals on various websites who have reported similar issues. There's a long thread of an almost identical issue from late 2010 with a relatively new Wrangler over at the popular *JeepForum*.

And if Chrysler wasn't interested in reading all of that there are multiple videos of Jeep Wranglers on fire.

After the incident occurred with █ he said he banged his head against the wall trying to get someone to answer him. He looked into the issue and discovered all the other customers with similar issues.



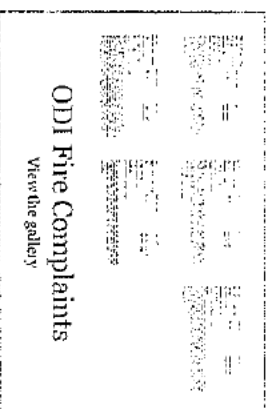
Eventually, he heard from Chrysler and says they offered to buy his Jeep back at full sale value plus some additional funds — but he'd have to sign a non-disclosure agreement. He refused, saying he demanded to know why this keeps happening and what Jeep planned to do about this.



"My insurance is going to cover the car," says █ "I'm more concerned about these people Jeep owners for years"



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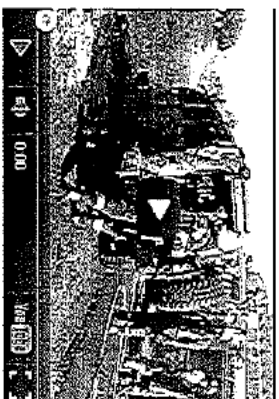
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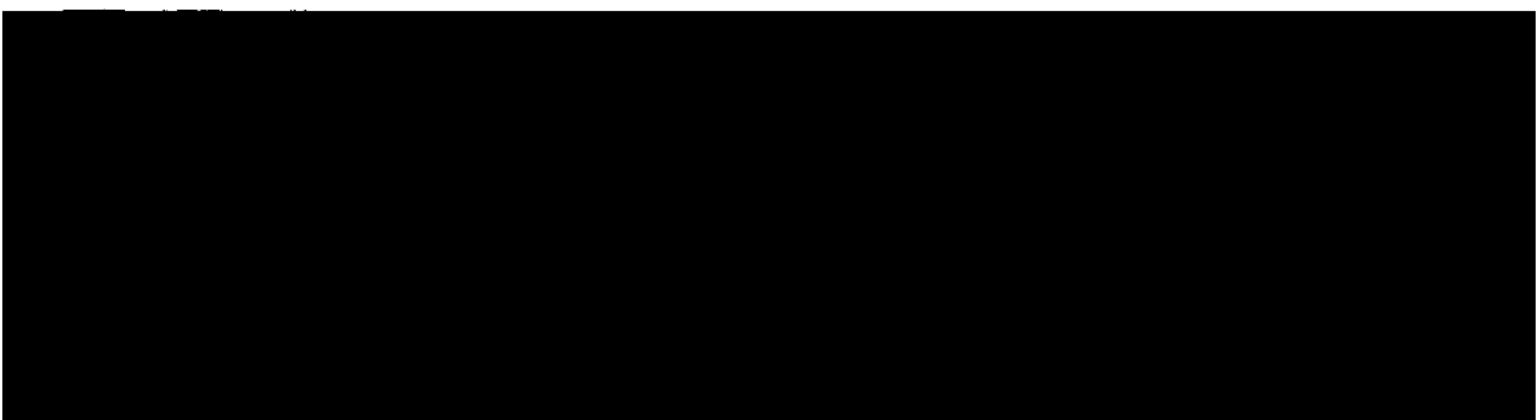
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Videos Of Jeep Fires

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█ says he wants answers.

In a statement, Chrysler confirms that they did offer to buy back the vehicle and made a "very generous offer" but denies there are any issues with the vehicle.

Statement from Chrysler

Chrysler Group took prompt action to inspect this customer's vehicle, which is more than two years old with more than 25,000 miles of use at the time of the incident. Despite the age and mileage of this vehicle, and even though the root cause of the fire has not yet been determined, Chrysler Group made a fair and reasonable offer to resolve the matter in the interests of good faith customer service. Unfortunately, this customer has so far refused to accept our reasonable offer and the matter remains unresolved. We note that vehicle fires are very complex and can occur for a number of reasons that have nothing to do with the vehicle itself. Poor maintenance, improper vehicle use or improper installation of aftermarket equipment often are causes of vehicle fires. Indeed, the Jeep Wrangler has an excellent safety record over many years of operation in markets around the world.

As for why this issue seems so common among Jeep owners, Chrysler added that the abuse these vehicles take can lead to issues, as well as implying that improper maintenance can be involved.

We take all vehicle fires very seriously, investigate them promptly and are in regular communication with regulators about the real world safety performance of our products. We note that vehicle fires are very complex and can occur for a number of reasons that have nothing to do with the vehicle itself. Poor maintenance, improper vehicle use or improper installation of aftermarket equipment often are causes of vehicle fires.

The National Highway Traffic Safety Administration is aware of the issues with the fires and has investigated Jeeps for fire-related issues in the past.

A spokesperson for NHTSA said they are "monitoring the issue closely and will take appropriate action as necessary."

█ hopes to make these fires more public so that Jeep owners and prospective Jeep buyers are aware.

"I was in a burning car and I was just real pissed off when I found out how expansive the problem was," says █.

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
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Contact *Matt Hawthorne*:

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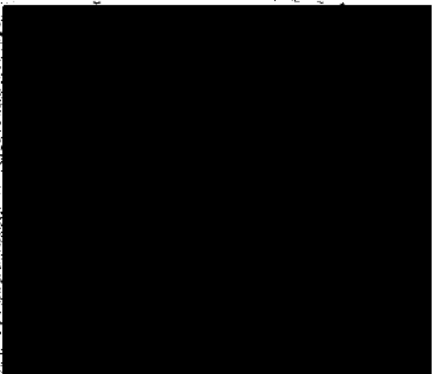
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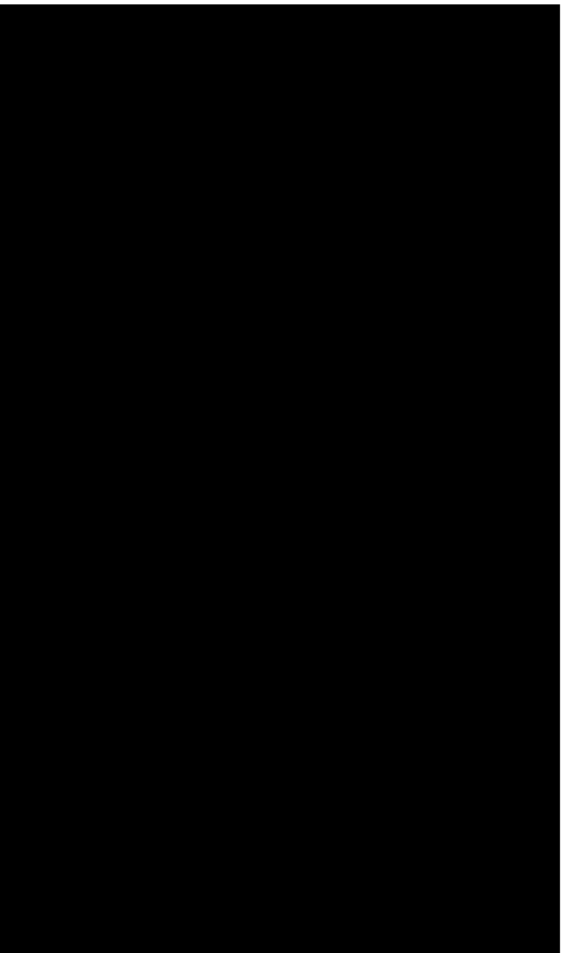


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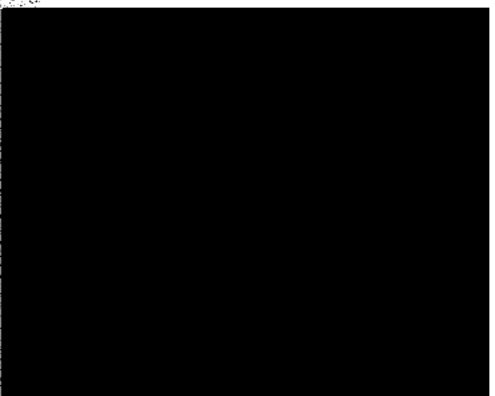
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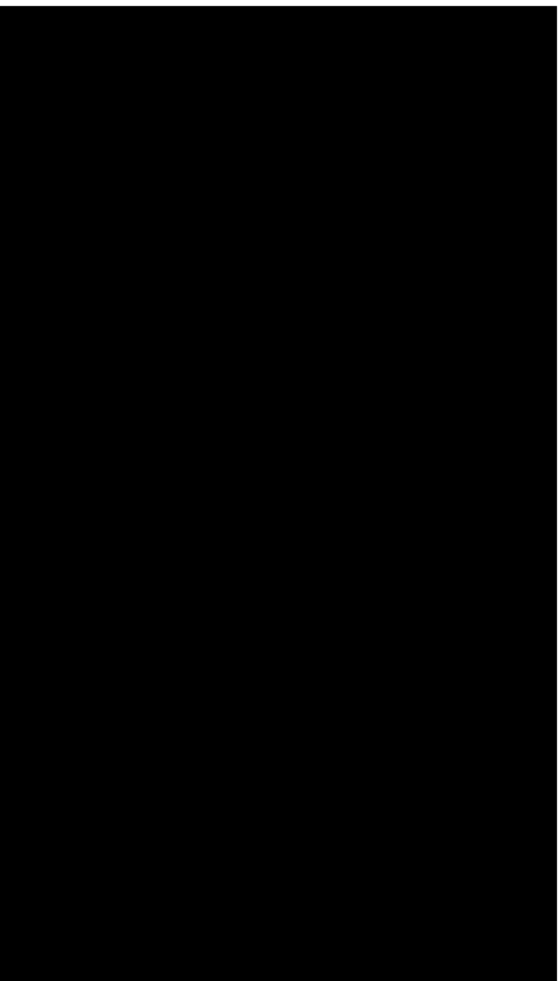


DISCUSSION THREADS

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SUMMARY OF ADDITIONAL INCIDENT

MATTER # [REDACTED]
FILE TYPE Lawsuit
FILE NAME [REDACTED]
CAIR #
DATE OF INCIDENT 11/16/2011
DATE OF NOTICE 05/01/2012
MODEL/MODEL YEAR 1997 Jeep Grand Cherokee (ZJ)
VIN 1J4FX88XVC [REDACTED]
MILEAGE
OWNER [REDACTED]
COURT [REDACTED] Davenport, Florida
DOCKET # [REDACTED] 18th Circuit Court, Seminole, Florida
FIRE ALLEGED Yes
DESCRIPTION According to the police report, on November 16, 2011, [REDACTED] [REDACTED] was driving a 1997 Jeep Grand Cherokee (ZJ) westbound on Boulevard overpass, with [REDACTED] Lake Mary, Florida approaching the [REDACTED] [REDACTED] in the right-front seat. In the area of the accident, Interstate 4 had a 65 mph posted speed limit. The Jeep Grand Cherokee (ZJ) had stopped in the left lane because of traffic congestion. A 2002 Mercury Mountaineer, being driven by [REDACTED] [REDACTED] at approximately 65 mph, failed to observe the stopped traffic ahead and struck the rear of the Jeep Grand Cherokee (ZJ). The impact caused a multi-car collision, pushing the front end of the Jeep Grand Cherokee (ZJ) forward into a 2012 Chevrolet Traverse, which in turn was pushed into a 2004 Nissan Maxima, which in turn was pushed into a 2007 Cadillac Escalade towing a trailer. A fire in the area of the rear of the Jeep Grand Cherokee (ZJ) and the front of the Mercury Mountaineer ensued.

PROPERTY DAMAGE ALLEGED No
INJURIES 1
FATALITIES 1
ANALYSIS

Investigation of the accident by Chrysler Group is ongoing and is at a preliminary stage. Based on currently available information, including the police accident report and news reports, Chrysler Group concludes this was an extremely high speed and high energy rear impact with the Mercury Mountaineer striking the rear of the Jeep Grand Cherokee (ZJ) at an approximate relative velocity of 65 mph. According to news

reports, the Florida Highway Patrol stated that the driver of the Mercury Mountaineer did not realize traffic had stopped ahead of him and did not attempt to brake prior to the impact. The police accident report noted that the driver of the Mercury Mountaineer was asleep or fatigued at the time of the accident. The front end of the Jeep Grand Cherokee (ZJ) was damaged when it was pushed into the Chevrolet Traverse, increasing the forces on the rear of the vehicle, resulting in the extensive damage seen in the photograph below.



The interposition of the Jeep Grand Cherokee (ZJ) between the Mercury Mountaineer and the Chevrolet Traverse and the additional vehicles involved in the collision likely increased the crash forces acting on the Jeep Grand Cherokee (ZJ). Because investigation of the accident is at an early stage, Chrysler Group has not yet been able to confirm that, as a result of the accident, the fuel tank of the Jeep Grand Cherokee (ZJ) was ruptured or that the origin of the fire was at the fuel tank.



























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