

PE13-010

CHRYSLER

6/20/2013

ENCLOSURE 4

FIELD DATA

LEGAL

LM 1235350 TNT



THE ATTORNEY GENERAL
STATE OF ARKANSAS
DUSTIN McDANIEL

1-13

RECEIVED
JAN 24
SPECIAL INVESTIGATIONS

Wednesday, January 16, 2013

Chrysler, LLC
P.O. Box 21-8004
CIMS: 431-00-01
Auburn Hills, MI, 48321-8004

RE: Consumer Complaints-100484, Mr. [REDACTED]

To Whom It May Concern:

The Consumer Protection Division of the Office of the Attorney General has received the enclosed complaint about your business practices.

While we do not represent the complainant as their attorney in this matter, our office does undertake efforts to mediate consumer complaints. That is the purpose of this contact with you. In addition, it is our duty under Arkansas' Deceptive Trade Practices Act to investigate potentially unfair or deceptive trade practices.

We respectfully request a written response from you regarding the complainant's allegations within ten (10) business days of your receipt of this letter, including any documents you think are relevant in supporting or explaining your position. Please include the complaint number and my name on all correspondence regarding this matter. If you would like to provide your response electronically, please email your response along with any attached documents to complaint.responses@arkansasag.gov, and include the complaint number and my name in the subject line of the email.

Your response to the complainant's allegations is required for us to conduct a fair evaluation of this matter. We will share your response with the consumer who has filed the complaint with our office. Our goal is to resolve this consumer complaint in a fashion that is acceptable to both the consumer and you. Thank you for your prompt attention to this matter.

Sincerely,

Toni Robinson
Toni Robinson
Investigator
Consumer Protection Division

RECEIVED
JAN 28 2013
CCRG
Office of the General Counsel

Sherrell Givens

From: [REDACTED]
Sent: Thursday, January 10, 2013 3:08 PM
To: Consumer Division
Subject: Consumer Complaint Form

This information was recently submitted via the web.

Your Information

[REDACTED]

City:Lowell

State:AR

[REDACTED]

Work Phone: Same

Age: 75

Email: [REDACTED]

Firm/Individual Complained Against Information

Name: Chrysler Corporation, CIMS Legal Department

Address: 1000 Chrysler

City: Auburn Hills

State:MI

Zip: 48326

Phone:1-888-922-7329

Email:

Website:

Product or Service Involved Information

Product or Service involved: 2006 Dodge Viper

Date of Transaction:

Did you sign a contract?

Yes No

Have you contacted the company?

Yes No

Have you consulted an attorney?

Yes No

If so, who?

Is there a court action pending?

Yes No

If so, where?

Estimate of dollars involved: \$55,000. - \$60,000.

Your view as to a fair resolution of the matter:

On December 2, 2012, a defective rear wheel knuckle snapped on my 2006 Dodge Viper while driving causing total damage and injury. This also happened on a Floridian's 2005 Dodge Viper on January 2, 2013 except it was the left knuckle. He has not received an estimate of damages yet. At this time, I believe, for the safety of other Viper owners, that a complete and thorough investigation is done and restitution be made for the damaged/totaled vehicles by Chrysler. Currently, Chrysler accepts no responsibility for these two vehicles. Serious injury or death could have resulted and may in the future if they do not seriously look into this defect. This is frightening to think of what may happen to others driving this vehicle. Thank you.

PLEASE EXPLAIN THE CIRCUMSTANCES SURROUNDING YOUR COMPLAINT. YOU WILL BE CALLED UPON TO PROVIDE COPIES (NOT ORIGINALS) OF ANY CONTRACTS, SALES SLIPS, CANCELED CHECKS, ADVERTISEMENTS, CORRESPONDENCE, OR RELATED DOCUMENTS.

Chrysler must accept responsibility for these accidents and definitely investigate the issue/defective part so no lives are lost.

The information contained here is true and accurate to the best of my knowledge. I understand that the Arkansas Attorney General's office does not represent individuals in matters involving private disputes. I am, however, filing this complaint to notify the Attorney General's office of the activities of this party and for any other assistance which may be rendered. I give my permission for this complaint to be referred to other agencies when appropriate.

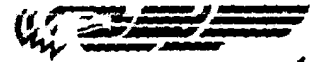


ATTORNEY GENERAL OF ARKANSAS
 Dustin McDaniel
 323 Center Street, Suite 200
 Little Rock, Arkansas 72201

PRESORTED
 FIRST CLASS



U.S. POSTAGE >>> PITNEY BOWES



ZIP 72201 \$ 000.42⁴
 02 1W
 0001370310 JAN 18 2013

Chrysler, LLc
 P.O. Box 21-8004
 CIMS: 431-00-01
 Auburn Hills, MI, 48321-8004

CONSUMER

L-WFSMP 48321



PE13-010

CHRYSLER

6/20/2013

ENCLOSURE 4

FIELD DATA

LEGAL

MATTER #	1235350
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	22857460
DATE OF INCIDENT	11/30/2012
DATE OF NOTICE	12/04/2012
MODEL/MODEL YEAR	2006 Dodge Viper Srt10 Coupe
VIN	1B3JZ69Z66V [REDACTED]
MILEAGE	12,000
OWNER	[REDACTED] [REDACTED] Lowell, AR [REDACTED] [REDACTED]
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Wheels & Tires:Tires:Came off
DESCRIPTION	The rear control arm broke and rear wheel fell off.
CRASH	Yes
PROPERTY DAMAGE	No
INJURIES	1
FATALITIES	0
ANALYSIS	An inspection suggested ¹ the damage was impact related. The photos show extensive damage to the front of the vehicle that extends to the underbody. If the control arm broke while driving the entire wheel would have been compromised and most likely detached from the vehicle. No indication of a manufacturing related concern.

¹ A vehicle inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work product privilege.

PE13-010

CHRYSLER

6/20/2013

ENCLOSURE 4

FIELD DATA

LEGAL

MATTER #	1221283
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	20824404
DATE OF INCIDENT	05/14/2011
DATE OF NOTICE	05/15/2011
MODEL/MODEL YEAR	2004 Dodge Viper Srt-10
VIN	1B3JZ65Z74V [REDACTED]
MILEAGE	11,181
OWNER	[REDACTED] [REDACTED] Wrentham, MA [REDACTED] [REDACTED]
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Suspension:Control Arm/Ball Joints:Broke
DESCRIPTION	The customer stated that while driving in a straight line the vehicle lurched as if hit, he lost control and crashed. The owner believes poor casting quality is cause.
CRASH	Yes
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	An inspection revealed ¹ the steering arm knuckle is broken and the lower ball joint is bent indicating it was attached at the time of impact. The damage appears to be impact related. Photos indicate no manufacturing related concerns with the control arm that caused or contributed to the accident.

¹ A vehicle inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work product privilege.

PE13-010

CHRYSLER

6/20/2013

ENCLOSURE 4

FIELD DATA

LEGAL

MATTER #	1155323
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	13413131
DATE OF INCIDENT	03/14/2005
DATE OF NOTICE	03/16/2005
MODEL/MODEL YEAR	2004 Dodge Viper Srt-10
VIN	1B3JZ65Z54V [REDACTED]
MILEAGE	4,006
OWNER	[REDACTED] [REDACTED] Beverly Hills, CA [REDACTED] [REDACTED]
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Axle:Axle Shaft:Broke
DESCRIPTION	Customer stated something broke while accelerating at 25 MPH, vehicle went into a spin and hit curb.
CRASH	Yes
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	An inspection revealed ¹ there was evidence of severe impact to right rear wheel causing damage to suspension components, including the knuckle. There was no indication of a manufacturing related concern.

¹ A vehicle inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work product privilege.

PE13-010

CHRYSLER

6/20/2013

ENCLOSURE 4

FIELD DATA

LEGAL

MATTER #	1202805
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	18596334
DATE OF INCIDENT	04/28/2009
DATE OF NOTICE	05/19/2009
MODEL/MODEL YEAR	2008 Dodge Viper Srt10 Convertible
VIN	1B3JZ65Z88V [REDACTED]
MILEAGE	4,800
OWNER	[REDACTED] [REDACTED] Nokomis, FL [REDACTED] [REDACTED]
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Wheels & Tires Axle
DESCRIPTION	Customer stated he was driving around a curve to the left when the right rear axle broke causing him to lose control of the vehicle hitting the curb.
CRASH	Yes
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	An inspection revealed ¹ a repair on a steering arm knuckle and photos suggest all the damages are related to impact.

¹ A vehicle inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work product privilege.

PE13-010

CHRYSLER

6/20/2013

ENCLOSURE 4

FIELD DATA

LEGAL

185 96334

04/30/2009 at 10:28 PM
45742

File ID: 12042

ACCURATE ADJUSTMENT CO
AUTO OWNERS INSURANCE CO
FOR AUTO OWNERS CLAIMS
P.O. BOX 67
SARASOTA, FL 34230
(941)966-6728 Fax: (941)966-7261
Written By: Kirk Shiveil 04/30/2009 10:27 PM

For: AUTO OWNERS INSURANCE COMPANY -
Adjuster: BOB LUCAS

ESTIMATE OF RECORD

Insured [Redacted]
Owner [Redacted]
Address [Redacted]
NOKOMIS, FL
Day: [Redacted]
Cellular: [Redacted]

Claim # [Redacted]
Policy # [Redacted]
Date of Loss: 04/28/2009 at 03:00 PM
Type of Loss: Collision
Point of Impact: 4. Right Qtr Post

Inspect SUNSET DODGE
Location: 7745 SOUTH TAMiami TRAIL
SARASOTA, FL 34231

Business: (941)922-2400
DRIVE_IN

Repair SUNSET DODGE
Facility: 7745 SOUTH TAMiami TRAIL
SARASOTA, FL 34231

Business: (941)922-2400
8 Days to Repair
License #

2008 DODG VIPER SRT-10 10-8.4L-F 2D CNVT MAROON Int:GRAY
VIN: 1B3JZ65Z88V [Redacted] Lic: SAIL NFL FL Prod Date: Odometer: 4709

- | | | |
|-------------------------|----------------------|-----------------------|
| Air Conditioning | Rear Defogger | Tilt Wheel |
| Intermittent Wipers | Keyless Entry | Theft Deterrent/Alarm |
| Message Center | Dual Mirrors | Console/Storage |
| Fog Lamps | Xenon Headlamps | Clear Coat Paint |
| Power Steering | Power Brakes | Power Windows |
| Power Locks | Power Mirrors | Power Trunk/Tailgate |
| Power Adjustable Pedals | AM Radio | FM Radio |
| Stereo | Search/Seek | CD Player |
| Anti-Lock Brakes (4) | Driver Air Bag | Passenger Air Bag |
| 4 Wheel Disc Brakes | Escitraction | Leather Seats |
| Bucket Seats | 6 Speed Transmission | Overdrive |
| Aluminum/Alloy Wheels | | |

NO.	OP.	DESCRIPTION	QTY	EXT.	PRICE	LABOR	PAINT
1		FRONT BUMPER					
2*	Rpr	Bumper cover			2.0		3.8
3		Add for Clear Coat					1.5
4		O/H bumper assy			3.4		
5		WHEELS					
6*	Repl	RT Wheel, alloy front, 18x10 code WP6	1	1008.00	m	0.3 M	

4930
Adhesive 8115
20 tubes

04/30/2009 at 10:28 PM
45742

File ID: 12012

ESTIMATE OF RECORD
2008 DODG VIPER SRT-10 10-8.4L-F 2D CNVT MAROON Int:GRAY

NO.	OP.	DESCRIPTION	QTY	EXT. PRICE	LABOR	PAINT
7*	Repl	RT Wheel, alloy rear, 19x13 code WPE	1	1114.00	m	0.3 M
8		TIRES				
9*	Repl	MICH 345/30ZR19 PILOT SPORT 105Y	1	748.75		0.3 M
10*	Repl	MICH 275/35ZR18 PILOT SPORT 95Y	1	452.50		0.3 M
11		REAR SUSPENSION				
12	Repl	RT Rotor	1	114.00	m	Incl. M
13	Repl	RT Hub & bearing	1	372.00	m	Incl. M
14		Align four wheels			m	2.5 M
15	Repl	RT Knuckle assy	1	522.00	m	1.6 M
16	Repl	RT Upper cntrl arm	1	723.00	m	1.3 M
17		Deduct for Overlap				-0.3 M
18	Repl	RT Lower cntrl arm	1	783.00	m	1.5 M
19		Deduct for Overlap				-0.3 M
20	Repl	RT Axle assy	1	730.00	m	1.4 M
21		Deduct for Overlap				-0.9 M
22#	Repl	Parking Brake caliper	1	335.00		1.0 M
23	Repl	Bleed brake system	1		m	0.6 M
24		FRAME				
25	Repl	Frame assy	1	20815.00	s	30.0 M
26		EXHAUST SYSTEM				
27	Rpl	Exhaust System			m	2.8 M
28*	R&I	RT Converter & pipe			m	Incl. M
29*	R&I	LT Converter & pipe			m	Incl. M
30		RESTRAINT SYSTEMS				
31	Repl	System diagnosis	1		m	0.5 M
32		AIR CONDITIONER & HEATER				
33	Repl	Refrigerant recovery	1		m	0.4 M
34	Repl	Evacuate & recharge	1		m	1.4 M
35#	Subl	Replace Antifreeze	1	20.00	T	
36#	Subl	Misc hardware supplies etc.	1	25.00	T	
37#	Subl	Hazmat	1	5.00	T	
Subtotals ==>				27767.25		50.1 5.0

Parts		27717.25
Body Labor	5.4 hrs @ \$ 42.00/hr	226.80
Paint Labor	5.3 hrs @ \$ 42.00/hr	222.60
Mechanical Labor	44.7 hrs @ \$ 99.00/hr	4425.30
Paint Supplies	5.3 hrs @ \$ 24.00/hr	127.20
Sublet/Misc.		50.00
SUBTOTAL		\$32769.15
Sales Tax		\$32769.15 @ 7.0000% 2293.84

04/30/2009 at 10:28 PM
45742

File ID: 12062

ESTIMATE OF RECORD
2008 DODG VIPER SRT-10 1C-8.4L-F 2D CNVT MAROON Int:GRAY

TOTAL COST OF REPAIRS	\$35062.99
ADJUSTMENTS:	
Deductible	1000.00

TOTAL ADJUSTMENTS	\$ 1000.00
NET COST OF REPAIRS	\$34062.99

THIS IS NOT AN AUTHORIZATION TO REPAIR. NO SUPPLEMENTS WITHOUT PRIOR COMPANY INSPECTION AND APPROVAL !!!!!!!!!!!!!!!
APPRAISER: KIRK J. SHIVELL

ANY PERSON WHO KNOWINGLY AND WITH INTENT TO INJURE, DEFRAUD, OR DECEIVE ANY INSURER FILES A STATEMENT OF CLAIM OR AN APPLICATION CONTAINING ANY FALSE, INCOMPLETE, OR MISLEADING INFORMATION IS GUILTY OF A FELONY OF THE THIRD DEGREE (FLORIDA STATUTES TITLE XLVI, CHAPTER 817.234). FAILURE TO USE THE INSURANCE PROCEEDS IN ACCORDANCE WITH THE SECURITY AGREEMENT, IF ANY, COULD BE A VIOLATION OF S. 812.014, FLORIDA STATUTES. IF YOU HAVE ANY QUESTIONS, CONTACT YOUR LENDING INSTITUTION. IF A CHARGE FOR SHOP SUPPLIES OR HAZARDOUS OR OTHER WASTE REMOVAL IS INCLUDED ON THIS ESTIMATE, PLEASE NOTE THE FOLLOWING: "THIS CHARGE REPRESENTS COSTS AND PROFITS TO THE MOTOR VEHICLE REPAIR FACILITY FOR MISCELLANEOUS SHOP SUPPLIES OR WASTE DISPOSAL." IF A CHARGE FOR NEW TIRES OR A NEW OR REMANUFACTURED LEAD-ACID BATTERY IS INCLUDED ON THIS ESTIMATE, PLEASE NOTE THE FOLLOWING: A \$1.00 FEE FOR EACH NEW MOTOR VEHICLE TIRE SOLD AT RETAIL IS IMPOSED ON ANY PERSON ENGAGING IN THE BUSINESS OF MAKING RETAIL SALES OF NEW MOTOR VEHICLE TIRES WITHIN THE STATE OF FLORIDA. FLORIDA STATUTES TITLE XXI, CHAPTER 403.718. A \$1.50 FEE FOR EACH NEW OR REMANUFACTURED LEAD-ACID BATTERY SOLD AT RETAIL IS IMPOSED ON ANY PERSON ENGAGING IN THE BUSINESS OF MAKING RETAIL SALES OF NEW OR REMANUFACTURED LEAD-ACID BATTERIES WITHIN THE STATE OF FLORIDA. FLORIDA STATUTES TITLE XXIX 403.7185.

04/30/2009 at 10:28 PM
45742

File ID: 12042

ESTIMATE OF RECORD
2008 DODG VIPER SRT-10 16-8.4L-F 2D CNVT MAROON Int:GRAY

TIRE PARTS SUPPLIERS

9 MICH 245/30ZR19 PILOT SPORT 10
10 MICH 275/35ZR18 PILOT SPORT 95

Price: \$ 748.75
Price: \$ 452.50

Tires Plus
1103 N. Washington Blvd
Sarasota, FL 34236

Phone: (941)365-1236
FAX:

PE13-010

CHRYSLER

6/20/2013

ENCLOSURE 4

FIELD DATA

LEGAL

MATTER #	1235973
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	22949130
DATE OF INCIDENT	12/30/2012
DATE OF NOTICE	01/03/2013
MODEL/MODEL YEAR	2005 Dodge Viper Srt-10 Convertible
VIN	1B3JZ65Z95V [REDACTED]
MILEAGE	36,000
OWNER	[REDACTED] [REDACTED] Milton, FL [REDACTED] [REDACTED]
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Wheels & Tires:Construction
DESCRIPTION	Customer stated the rear tire turned inward causing him to hit a wall. Customer said it felt like he was rear-ended.
CRASH	Yes
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	An inspection revealed ¹ the steering arm knuckle is broken. The photos show damage to the left rear wheel surface indicating that the fractured knuckle where the tie rod is attached resulted from impact. The conclusion was the damage was related to impact. The vehicle was disassembled prior to the inspection.

¹ A vehicle inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work product privilege.