**REQUESTS**

**1.** State whether you have submitted the information required by 49 C.F.R. Part 566 prior to the date of this Special Order.

A.1. The effort went to and believed that all the prospects have been obliged.

a. If you have submitted the information required by 49 C.F.R. Part 566, provide a copy of the information that was submitted and the date(s) that information was submitted. State whether the information submitted is current, accurate, and complete.

A.1.a. Please refer to the correspondences with DOT took place on the following dates: 10/11/2011, 9/12/2013, 8/13/2014, 10/21/2014 and 1/31/2015

b. If you have not submitted the information required under 49 C.F.R. Part 566 prior to the date of this Special Order, provide your explanation for your failure to do so. In addition, provide the current, accurate, and complete information and the date on which you intend to submit the information.

A.1.b Please refer to A.1.

2. Provide a corporate organizational chart(s) identifying the employees who are responsible for collecting and reporting information to NHTSA pursuant to 49 C.F.R. Part 573. Include the name, title, business address, business email, and business telephone number for each person(s).

A.2. No specific organization was assigned.

3. Describe Tegol's policy or procedure for tracking and submitting quarterly reports for the past 10 years, including the steps Tegol undertakes to comply with the submission deadlines in 49 C.F.R. § 573.7. Your answer should explain any changes in that policy or procedure and include a copy of all documents describing the policy or procedure.

A.3. Please refer to A.1.

4. Admit that you were sent the following official NHTSA correspondence regarding missing quarterly reports for Recall Nos. 16E-062 and 17E-015.
a. Email from Jennifer Timian to Mr. Aaron Golshani dated 02/21/2017, attached hereto as Exhibit 1;

A.4. Received
A.4. Please refer to A.1.

b. Email from Jennifer Timian to Mr. Aaron Golshani dated 02/28/2017 with the subject: Failure to File Required Recall Quarterly Report, attached hereto as Exhibit 2;

A.4.b. Received
A.4.b. Please refer to A.1.

c. Email from Jennifer Timian to Mr. Aaron Golshani dated 05/16/2017, attached hereto as Exhibit 3, and;

A.4.c. Received
A.4.c. Please refer to A.1.

d. Email from Jennifer Timian to Mr. Aaron Golshani dated 05/16/2017, attached hereto as Exhibit 4.

A.4.d. Received
A.4.d. Please refer to A.1.

5. Provide a list of all quarterly report submissions for Recall Nos. 16E-062 and 17E-015 that you submitted, or should have submitted, to NHTSA in accordance with 49 C.F.R. § 573.7. Your response should be in the following format:

A.5. Please see the required table bellow;

| | Date Due | Date Submitted | Date Due | Date Submitted | Date Due | Date Submitted | Date Due | Date Submitted | Date Due | Date Submitted |
|---|---|---|---|---|---|---|---|---|---|---|
| 16E-062 | 10/30/2016 | 10/30/2016 | 1/30/2017 | 3/9/2017 | 4/30/2017 | 8/1/2017 | 7/30/2017 | 11/9/2017 | 10/30/2017 | 12/7/2017 |
| 17E-015 | 4/30/2017 | 11/09/2017 | 7/30/2017 | 12/7/2017 | 10/30/2017 | 12/7/2017 | 1/30/2018 | n/a | 4/30/2018 | n/a |

6. With respect to Tegol's fourth quarterly report for Recall No. 16E-062, for the second quarter of 2017, which was due on or before July 30, 2017:
a. State the date on which you provided this quarterly report to NHTSA.

A.6.a. Please refer to A.5.

b. If you contend that the date on which you first provided the report to NHTSA was on or before July 30, 2017, produce all documents to support your contention.

A.6.a. Please refer to A.5.
c. If you have not previously provided this quarterly report to NHTSA, provide the report in your response to this Special Order.

A.6.c. Please refer to A.5.

7. With respect to Tegol's fifth quarterly report for Recall No. 16E-062, for the third quarter of 2017, which was due on or before October 30, 2017:

A.7. Please refer to A.5.

a. State the date on which you provided this quarterly report to NHTSA.

A.7.a. Please refer to A.5.

b. If you contend that the date on which you first provided the report to NHTSA was on or before October, 2017, produce all documents to support your contention.

A.7.b. Please refer to A.5.

c. If you have not previously provided this quarterly report to NHTSA, provide the report in your response to this Special Order.

A.7.c. Please refer to A.5.

8. With respect to Tegol's first quarterly report for Recall No. 17E-015, for the first quarter of 2017, which was due on or before April 30, 2017:
a. State the date on which you provided this quarterly report to NHTSA.

A.8.a Please refer to A.5.

b. If you contend that the date on which you first provided the report to NHTSA was on or before April 30, 2017, produce all documents to support your contention.

A.8.b Please refer to A.5.

c. If you have not previously provided this quarterly report to NHTSA, provide the report in your response to this Special Order.

A.8.c Please refer to A.5.

9. With respect to Tegol's second quarterly report for Recall No. 17E-015, for the second quarter of 2017, which was due on or before July 30, 2017:
a. State the date on which you provided this quarterly report to NHTSA.

A.9.a. Please refer to A.5.

b. If you contend that the date on which you first provided the report to NHTSA was on or before July 30, 2017, produce all documents to support your contention.

A.9.b. Please refer to A.5.

c. If you have not previously provided this quarterly report to NHTSA, provide the report in your response to this Special Order.

A.9.c. Please refer to A.5.

10. With respect to Tegol's third quarterly report for Recall No. 17E-015, for the third quarter of 2017, which was due on or before October 30, 2017:
a. State the date on which you provided this quarterly report to NHTSA.

A.10.a. Please refer to A.5.

b. If you contend that the date on which you first provided the report to NHTSA was on or before October 30, 2017, produce all documents to support your contention.

A.10.b. Please refer to A.5.

c. If you have not previously provided this quarterly report to NHTSA, provide the report in your response to this Special Order.

A.10.c. Please refer to A.5.

11. For each quarterly reporting period, as established in 49 C.F.R. Part 573, from September 1, 2012 through the present date, provide copies of all quarterly reports required under 49 C.F.R. § 573.7 and not previously provided to NHTSA.

A.11. Please refer to A.5.

12. Describe in detail any measures Tegol may be planning or has executed to achieve a maximum possible completion rate for NHTSA Recall Nos. 12E-051, 13E-047, 14E- 069, 16E-062, and 17E-015. Produce copies of any documents that evidence Tegol's customer outreach plans or that reflect the measures it has taken, or intends to take, above and beyond the required owner and dealer notifications.

A.12. Please refer to A.1.

13. Describe in detail the challenges, if any, Tegol faces in achieving a maximum possible completion rate for each recall.

A.13. Please refer to A.1.

14. Describe how Tegol determines that subject motorcycle helmet owners are unreachable for recall purposes, including any processes or steps taken before making that determination.

A.14. Please refer to A.1.

15. Describe in detail the training, if any, that employees involved in recall administration receive regarding 49 C.F.R. Part 573 and/or Part 577. Provide a copy of any written training or guidance materials regarding 49 C.F.R. Part 573 and/or Part 577 used by employees involved in recall administration.

A.15. Please refer to A.1. & A.2.

16. Describe in detail any and all requirements, practices, processes, or other methods Tegol uses for customer service, including inquiries regarding recalls and recall remedies. In addition, provide the internal process by which Tegol records and documents adherence to these practices.

A.16. Assigned Toll Free Number 1-866-371-0281

17. Provide a detailed explanation of how Tegol addresses calls to its hotline (1-714-496-9988) from consumers regarding Recall No. 16E-062. Include in your answer:
a. How the hotline is monitored;

A.17.a. Assigned Toll Free Number 1-866-371-0281 with answering system.

b. Who answers the hotline;

A.17.a. Please refer to A.17.a

c. If Tegol employees answer the hotline, state their name, division, and title;

A.17.c. Please refer to A.17.a

d. What, if any, protocol Tegol follows when answering calls;

A.17.d. Please refer to A.17.a

e. What, if any, protocol Tegol follows to address voicemails left on the hotline;

A.17.e. Please refer to A.17.a

f. How long Tegol takes to follow-up with consumers who call or leave voicemails;

A.17.f. Pending on the time zone and availability

g. How many total calls have been received by this hotline as of the date of this Special Order;

A.17.g. Please Refer to Exhibit "A"

h. How many calls this hotline has received that relate to Recall No. 16E-062 as of the date of this Special Order;

A.17.h. Refer to Exhibit "A"

i. The dates on which calls identified in subsection (h) were received; and

A.17.i. Refer to Exhibit "A"

j. The disposition of each call related to Recall No. 16E-062 (i.e., a mailing label was sent, a refund was sent, or there was no follow-up).

A.17.j. Between 2 to 8 weeks to complete.

18. Provide a detailed explanation of how Tegol addresses calls to its hotline (1-866-371-0281) from consumers regarding Recall Nos. 12E-051, 13E-047, 14E-069, 16E-062, and 17E-015. Include in your answer:
a. How the hotline is monitored;

A.18. Case by case.

b. Who answers the hotline;

A.18.b. Please refer to A.17.a

c. If Tegol employees answer the hotline, state their name, division, and title;

A.18.c. Please refer to A.2

d. What, if any, protocol Tegol follows when answering calls;

A.18.d. Please refer to A.17.a

e. What, if any, protocol Tegol follows to address voicemails left on the hotline;

A.18.e. Please refer to A.17.a

f. How long Tegol takes to follow-up with consumers who call or leave voicemails;

A.18.f. Please refer to A.17.j.

g. How many total calls have been received by this hotline as of the date of this Special Order;

A.18.g. Please Refer to Exhibit "A"

h. How many calls this hotline has received for each Recall specified in Request No. 18 as of the date of this Special Order;

A.18.h. Please Refer to Exhibit "A"

i. The dates on which the calls identified in subsection (h) were received; and

A.18.i. Please Refer to Exhibit "A"

j. The disposition of each call related to a recall specified in Request No. 18 (i.e., a mailing label was sent, a refund was sent, or there was no follow-up).

A.18.j. Between 2 to 8 weeks to complete.

19. Provide a detailed explanation of how Tegol handles emails to its address (tegolinc@gmail.com ) from consumers regarding Recalls. Include in your answer:

A.19. Case by case by available employee

a. How the email account is monitored;

A.19.a. Please refer to A.19

b. Who answers the emails;

A.19.b. Please refer to A.19

c. If Tegol employees answer the emails, state their name, division, and title;

A.19.c. Please refer to A.19

d. What, if any, protocol Tegol follows when responding to emails;

A.19.d. Please refer to A.19

e. How long Tegol takes to follow-up with consumers who send emails; and

A.19.e. Between 2 to 8 weeks.

f. How many total emails have been received by this address as of the date of this Special Order;

A.19.f. Please refer to Exhibit "A"

g. How many emails this address has received for each Recall as of the date of this Special Order;

A.19.g. Please refer to Exhibit "A"

h. The dates the emails identified in subsection (g) were received;

A.19.h. Please refer to Exhibit "A"

i. The disposition of each email identified in subjection (g) (i.e., a mailing label was sent, a refund was sent, or there was no follow-up); and

A.19.i. Between 2 to 8 weeks to complete.

j. Provide copies of all emails received from consumers at this email address regarding Recalls and all responses sent by Tegol to those consumers.

A.19.j. Please refer to Exhibit "A"

20. Provide a detailed explanation of how Tegol handles emails to its address (tegolrecall@gmail.com ) from consumers regarding Recalls. Include in your answer:
a. How the email account is monitored;

A.20.a. Please refer to A.19 & to Exhibit "A"

b. Who answers the emails;

A.20.b. Please refer to A.19 & to Exhibit "A"

c. If Tegol employees answer the emails, state their name, division, and title;

A.20.c. Please refer to A.19 & to Exhibit "A"

d. What, if any, protocol Tegol follows when responding to emails;

A.20.d. Please refer to A.19

e. How long Tegol takes to follow-up with consumers who send emails;

A.20.e. Between 2 to 8 weeks to complete.

f. How many total emails have been received by this address as of the date of this Special Order;

A.20.f. Please refer to Exhibit "A"

g. How many emails this address has received for each Recall as of the date of this Special Order;

A.20.g. Please refer to Exhibit "A"

h. The dates the emails identified in subsection (g) were received;

A.20.h. Please refer to Exhibit "A"

i. The disposition of each email identified in subjection (g) (i.e., a mailing label was sent, a refund was sent, or there was no follow-up); and

A.20.i. Between 2 to 8 weeks to complete.

j. Provide copies of all emails received from consumers at this email address regarding each Recall and all responses sent by Tegol to those consumers.

A.20.j. Please refer to Exhibit "A"

21. Identify all other telephone numbers, email addresses, websites, fax numbers, or mailing addresses that Tegol uses to communicate with consumers about recalls. For each, provide the same information sought in subsections (a)-(j) of Request Nos. 17 and 18 for telephone numbers and subsections (a)-(j) of Request Nos. 19 and 20 for email addresses, websites, fax numbers, and mailing addresses.

A.21. Telephone # 1-866-371-0281, email tegolrecall@gmail.com

22. Fully describe all current and past business relationships (i.e. ownership, subsidiary, supplier, distributor, shipping and return policies, etc.) between Tegol and the following:

a. Outlaw brand helmets; Brand Name
b. Hawk brand helmets; Brand Name

c. Rodia brand helmets; Brand Name
d. Shanghai Hehui Safety Products Manufacture Co., Ltd.; Vendor
e. Shanghai Hehui Safety Products Manufacture USA Co., Ltd.; Vendor
f. VCAN International Group; Vendor
g. VCAN Sports; Vendor
h. Huizhou City Golden Helmets Co., Ltd.; Vendor
i. Sunright International of America, Inc.; Vendor
j. Beijing Ajhx Helmet Technology & Trading Co Ltd; Vendor
k. Rodia USA; Brand Name
1. Beijing Rodia; Brand Name
m. BRF; Brand Name
n. LeatherUp.com ; Nanal, Inc.'s Website
o. MotorcycleCenter.com ; Ashdon, Inc.'s Webside
p. MyLeather.com ; Nanal, Inc.'s Website
q. Nanal, Inc.; Website Holder
r. Nox, Inc.; Website Hoster
s. Ashdon, Inc.; Website Holder
t. Etor, Inc.; Customer
u. Helmet Venture, Inc.; Consolidated Company
v. Tong Ho Hsing Industrial Co.; NK
w. Trans National Trading, Inc.; Vendor
x. Nikko Helmet USA; Brand Name
y. Nikko Helmets; Brand Name
z. Nikko Motoracing Inc.; Brand Name
aa. Dong Nikkei Industrial Co., Ltd.; NK
bb. Aral Trading Co. Inc.; A Company
cc. Biker's Barn; Consolidated dba name
dd. Grand Saz Global Inc.; Consolidated Company
ee. Biker Venture, Inc.; A company
ff. Dorsaz, Inc.; Customer
gg. Vintage Venture Group, Inc.; A bicycle company
hh. Aaron Golshani; Tegol's president
ii. Arash Golshani; Tegol's president
jj. Albert Bootesaz; Nanal, Inc.'s President
kk. Nahid Botehsaz; Nanal, Inc.'s Corp Officer
11. Nahid Bootesaz; Nanal, Inc.'s Corp Officer
mm. Doris Bootesaz; Dorsaz's President
nn. Mojgan Shabanian; and Albert Bootesaz's Spouse
oo. Kasra Shahrokhshahi. Accountant

23. Provide contact information, including a name, address, phone number, for each person or entity included in your response to Request No. 22.

A.23. Please refer to A.1.a.

24. Separately for each of the subject motorcycle helmets, state the name and contact information of the fabricating manufacturer(s).

A.24. Please refer to A.1.a.

25. For each manufacturer listed in your response to Request No. 24, state:
a. Whether the manufacturer has submitted identifying information and a description of the items it produces in accordance with 49 C.F.R. Part 566.

A.25.a. Please refer to A.1.a.

b. If the manufacturer has submitted the Part 566 information, state the full individual name, partnership, or corporate name used in the most recent submission.

A.25.b. Please refer to A.1.a.

c. If the manufacturer has not submitted the Part 566 information, state so and explain why a Part 566 submission was not made.

A.25.c. Please refer to A.1.a.

26. For each manufacturer listed in your response to Request No. 24, state:
a. Whether the manufacturer is a U.S. entity.

A.26.a. Please refer to A.1.a.

b. If it is not a U.S. entity, state whether it has designated an agent in accordance with 49 C.F.R. Part 551.

A.26.b. Please refer to A.1.a.

c. If the manufacturer has designated an agent in accordance with 49 C.F.R. Part551, state the full legal name of its agent.

A.26.c. Please refer to A.1.a.

Dated: November 9 , 2017
Stephen P.