

ROCK KRAWLER

S U S P E N S I O N

Administration for Safety Assurance
National Highway Traffic Safety Administration (NHTSA)
400 Seventh St. S.W.
Washington, DC 20590

RE: Initial Defect Report

Manufacturer: Douglas Industrial Inc.

Aftermarket Hardware; In specific ½-13 x 4.5 Grade 5 Carriage Bolt included in Rock Krawler Suspension systems; RKWK35XF, RK XK35XF, RKKJ35XF, and RKKK35XF.

Initiating Party: Pure Performance Group, Inc. DBA Rock Krawler Suspension

Dear People:

On October 15th 2008, The Pure Performance Group, Inc. D/B/A Rock Krawler Suspension determined that a product defect existed in certain pieces of hardware used in our systems supplied to us through Douglas Industrial. As described below, this piece of hardware was included in 4x4 performance suspension systems sold by Rock Krawler Suspension. Rock Krawler Suspension, D/B/A of the Pure Performance Group, Inc. is furnishing this notification.

This report was prepared on June 9th 2009. The reason for the delay in the filing of the report is due to the fact that we did not know this program even existed! We conducted our own safety notification and recall back in October completely on our own. This is the first time in our 7 year history that anything like this has ever happened. I have attached our initial letter of our voluntary recall that was submitted to our dealers and wholesalers back in Oct. 2008 as well as our initial response mailed to the inquiry of the NHTSA back in January 2009. We also posted on popular forums as outlined in the NHTSA investigation as to the corrective actions for the problem. We will be more than happy to meet any and all NHTSB requirements, but believe all corrective actions have already taken place and all effected customers are taken care of. We have had zero failures or issues since that time.

(1) The affected grade 2 ½"-13 x 4.5" carriage bolts was stocked in our bins by Douglas Industrial. Douglas Industrial 811 10th Street, Watervliet, NY 12189. Douglas Industrial was notified by Rock Krawler Suspension of the incorrect hardware, the voluntary recall, and corrective actions required. They have supplied us with the proper Grade 5 pieces of hardware for the kits and customers.

The agency should contact the following person with respect to this recall: Jeremy Purick, CEO, Pure Performance Group, Inc. 15 Lower Hudson Avenue Green Island, NY 12183. (Jeremy@rockkrawler.com); phone 518-270-9822, fax 518-270-1885.

(2) During the time period of August 1, 2008 through October 31, 2008, the number of vehicles equipped after sale are as follows, but SKU and vehicle make and model.

RKWK35XF – 2005 through 2009 Jeep Grand Cherokee 23 units
RKXK35XF – 2006 through 2009 Jeep Commander 5 units
RKKJ35XF – 2003 through 2007 Jeep Liberty 9 units
RKKK35XF – 2008 through 2009 Jeep Liberty 7 units

August 1, 2008 coincides with the first usage of the grade 2 carriage bolt instead of the proper grade 5 carriage bolts. The Oct 15th, 2008 date reflects the recognition of the incorrect hardware in the bins, effective quarantine of the affected parts and or kits, as well as the start of the corrective actions. The markings on the head of the fastener are easily recognized as a Grade 2 fastener versus the standard head markings of an SAE Grade 5 fastener.

(3) Pure Performance Group, Inc. reports the sale and distribution of 44 potentially effected kits containing the product defect.

(4) As set forth below, the root cause of the defect was the incorrect stocking and distribution of a piece of hardware. One Grade 2 ½" x 13 x 4.5" carriage bolt was mixed in with our standard inventory of Grade 5 ½" x 13 x 4.5" carriage bolts. Pure Performance Group, Inc. estimates that less than 100% of the aforementioned kits contain the improper hardware.

(5) On the aforementioned Jeep Vehicles; kits equipped with the improper Grade 2 carriage bolts could experience a loss of clamping force for the bottom strut fork, which could yield a loss of effective vehicle lift and or a lowering of the effected vehicle. It is plausible that the driver of said vehicle during the effective loss of lift may panic and put himself or herself in a questionable situation. At no point in time is a control apparatus of the vehicle being compromised! The steering linkage and A arms will always be unaffected in this response.

(6) Not applicable.

(7) The Pure Performance Group, Inc began the investigation on or about Oct 12th 2008 based on a customer's complaint. The Pure Performance Group, Inc. is not aware of any accidents or injuries that have resulted from the defective hardware and or kits, although it is plausible that the potential may exist. Two customers had returned the product to a dealer or installer for service work after noticing on side of the vehicle sat slightly lower than the other.

(8) Rock Krawler Suspension, a D/B/A of The Pure Performance Group, Inc. notified all dealers, wholesalers and distributors as well as end users with the product back in Oct. of 2008 asking them to verify the proper Grade carriage bolt was used. If notified that the hardware was incorrect, the proper carriage bolts were expedited out to the customer free of charge. If there was also a request for labor reimbursement, that was also taken care of on a flat rate basis free of out of pocket expense to the end user.

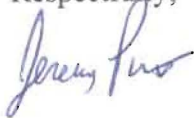
(9) Rock Krawler Suspension kits are distributed through independent regional warehouses, dealers, online retailers, and wholesalers. Rock Krawler Suspension conducted a notification process to the aforementioned distribution channels as well as seeking out end user information for notification. Rock Krawler Suspension also put posts up on public forums in an effort to expedite the notification process to the end users for the applicable vehicles. The notification process was a success and Rock Krawler Suspension believes it has all the effected customers taken care of.

(10) Due to the fact that this process is being filed with the NHTSA far after our own recall was performed, we will await further corrective actions from the NHTSA.

We have included with this packet the initial letter sent out via email and hard copy of our recall to dealers and wholesalers alike. We have also included our initial response letter to the safety concerns of the NHTSA back in January of 2009. We called it the NHTSB (National Highway Transportation Safety Board) since we were not aware exactly of whom we were dealing with or this process at this time.

The Pure Performance Group, Inc. welcomes any comments or suggestions to further enhance this recall campaign. The Pure Performance Group, Inc. would like to apologize to the NHTSA for not completing this form or process sooner. When the initial investigation was made by the NHTSA, we were never made aware of the process or the fact that we could submit this information to the NHTSA. The Pure Performance Group, Inc. simply performed the recall and notification process on its own going by the life long philosophy of do unto others as you would have done to you. If we were a customer of an aftermarket product and something was wrong with it, we would want to be notified and have the product corrected! That is the exact way we conducted ourselves. There have been zero issues since the corrective actions took place.

Respectfully,



Jeremy Purick
CEO Pure Performance Group, Inc.
DBA Rock Krawler Suspension
518-270-9822