



May 12,2015

Dear Customer:

The following is the proof-of-delivery for tracking number **800793416189**.

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**Delivery Information:**

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<b>Status:</b>	Delivered	<b>Delivered to:</b>	Mailroom
<b>Signed for by:</b>	<b>D.JESSIE</b>	<b>Delivery location:</b>	525 W OTTAWA ST 1ST FL MI 48909
<b>Service type:</b>	FedEx Standard Overnight	<b>Delivery date:</b>	<b>May 12, 2015 10:49</b>
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**Recipient:**

**AG BILL SCHUETTE**  
OFFICE OF MICH AG  
525 WEST OTTAWA ST.  
MI 48909 US

**Reference**

**Shipper:**

**PAUL V. SHERIDAN**  
SHERIDAN, PAUL V  
22357 COLUMBIA ST  
DEARBORN, MI 481243431 US

KAYLA WHITE

Thank you for choosing FedEx.

DDM Consulting  
22357 Columbia Street  
Dearborn, MI 48124-3431  
313-277-5095  
[pvs6@Cornell.edu](mailto:pvs6@Cornell.edu)

11 May 2015

VIA FEDEX AIRBILL 8007 – 9341 - 6189

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

**Subject: Criminal Investigation of those Responsible for the Manslaughter of Ms. Kayla White**

Reference 1: My Letter to You of 23 April 2015 (Same Subject)

Reference 2: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

**Courtesy Copy List** \*

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\* *By email and/or USPS*

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

<http://pvsheridan.com/Sheridan2Schuette-2-11May2015.pdf>

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Reference 1: My Letter to You of 23 April 2015 (Same Subject)  
Reference 2: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

Dear Mr. Schuette:

Following are update/information items:

Item 1: On May 7, 2015, I telephoned your office for the purpose of scheduling a meeting to discuss the subject and references. Your staff indicated that Reference 1 was “in the system,” and had been transferred to the criminal division. I will be re-telephoning your office in approximately three weeks to schedule a meeting with you, preferably in your Lansing office.

Item 2: Since your receipt of Reference 1, I have forwarded this and additional materials to the Attorneys General for the states of California, Georgia and Massachusetts. These and additional states, which are TBD, have Jeep Cherokee, Jeep Grand Cherokee and Jeep Liberty fire-injury or fire-death litigations in their jurisdictions. I have made similar Subject requests of these attorneys general; that a criminal investigation be pursued in behalf of their respective citizens.

Item 3: I am attaching two documents that merely begin to characterize the inveracity and criminality of Reference 2. As I quote these documents I will add comments/opinions that are quite reserved, and well-vetted by prior legal and expert review.

As detailed in Reference 1, a secret meeting in Chicago on June 9, 2013, between DOT Secretary Raymond LaHood, NHTSA Administrator David Strickland, and FCA Chairman Sergio Marchionne



resulted in the closure of NHTSA Defect Investigation EA12-005. The closure was premised on the publically announced fraud that a “trailer hitch” was conceived and tested as a crashworthiness device. <sup>A</sup>

**A full year after** that conspiratorial meeting, NHTSA Chief Counsel O. Kevin Vincent forwarded to FCA the SPECIAL ORDER DIRECTED TO CHRYSLER (Attachment 1). Dated July 2, 2014, Mr. Vincent states:

*“Shortly after receipt of Chrysler’s June 18, 2013 Part 573 Report, Chrysler officials and members of NHTSA’s Office of Defects Investigation (ODI) began discussions centering on the effectiveness of Chrysler’s proposed remedy.”*



DOT, NHTSA and FCA had never confirmed, through testing, that their recall was effective prior to making those claims to the general public, such as expecting mother, Michigan resident, 23-year-old Ms. Kayla White.

In Reference 1 I detailed how working staff at NHTSA, the Office of Defects Investigation (ODI), the group I worked with during EA12-005, were purposely left in the dark about the June 9, 2013 meeting.

A year later, Mr. Vincent continues:

*“Although ODI staff agreed that addition of the trailer hitches would, as a general proposition, stiffen the rear structure of the vehicles, ODI remained concerned about the ability of the hitches to mitigate the risk of fire in low and moderate speed rear impacts.”*

In other words, the working level people at NHTSA, the ODI, were concerned that *“Chrysler’s proposed remedy”* could not even protect in low speed impacts, let-alone in the scenario that killed Kayla and her unborn son. But even this *“low and moderate speed”* wording is cagey. Mr. Vincent continues:

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

Let us be clear . . . That statement by NHTSA is an admission that their “remedy,” publically declared a year earlier on June 9, 2013, had no basis. Further, their statement that Chrysler *“would not conduct any testing”* affirms that none had been conducted prior. These confirm not only the criminality of Reference 2 . . . but also the criminality of the foreseeable death of Kayla and her unborn son on November 11, 2014:



On November 14, 2014, a mere three days (!) after Kayla and Braedin burned to death in the Jeep Liberty conflagration above (a scene straight from Hell), NHTSA and ODI published their “Closing Resume” for EA12-005 (Attachment 2). The Resume states:

*“ODI does not approve proposed defect remedies. While offering to install hitch receiver assemblies on the . . . 2002-2007 Liberty, Chrysler did not, in ODI’s view, provide enough evidence demonstrating the effectiveness of the proposed remedy in rear impacts. Recognizing the nature of the concern in EA12-005 and its potential for injury and death, ODI took the unusual step of requesting that NHTSA’s Vehicle Research Test Center (VRTC) conduct crash reconstruction tests of actual crash incidents that were identified during the investigation to evaluate the remedy.”*

This incompetent, convoluted, mealy-mouth diversionary double-talk should make you reel in revulsion.

The first diversion spews from the first sentence; the notion that ODI does not approve defect remedies is tantamount to declaring that they are, in essence, utterly worthless. NHTSA is attempting to deceive the public by deploying a diversion regarding the specific technical detail of a remedy. While it is true that NHTSA is not responsible for proposal details, it is their public duty to receive from the governed (in this case FCA), in behalf of the taxpayer, detailed technical confirmation of the viability of that remedy, **PRIOR** to jointly announcing such to people such as Ms. Kayla White.

Their next sentence confirms the criminality of the June 9, 2013 announcement by DOT Secretary LaHood, NHTSA Administrator Strickland, and FCA Chairman Marchionne. When combined with the details of the SPECIAL ORDER, this Resume sentence tells us that a full year had passed before anyone could make any empirical statements about the alleged viability of the so-called “remedy.”

But it only gets worse . . . The “detail” not specified by the Resume is the precise “*actual crash incidents*” that their “*reconstruction tests*” were based upon. Understanding that the following cases were part of the NHTSA data base . . . let us ask questions that specify what NHTSA, very studiously, did **NOT** reconstruct:

- A. Under ODI specification, did NHTSA’s Vehicle Research Test Center (VRTC) conduct reconstruction tests of the actual crash incident that killed Susan Kline? **B**



**No.**

B. Did NHTSA conduct reconstruction tests of the actual crash incident that killed Skyler Coughlin?



**No.**

C. Did NHTSA conduct tests of the actual crash incident that killed Remington Walden?



**No.**

D. Did NHTSA reconstruct the actual crash incident that horribly maimed Ana Pina; a crash that included the fact that her Jeep Cherokee had the NHTSA/DOT/FCA “remedy”?<sup>C</sup>



**No.**

E. Did NHTSA reconstruct the actual incident that killed Cassidy Jarmon; a crash that included the fact that the Jeep Grand Cherokee had the NHTSA/DOT/FCA “remedy”?



**No.**

F. Did NHTSA reconstruct the actual crash incident that horribly maimed the Sanchez brothers?



**No.**

G. Did NHTSA reconstruct the actual crash incident that killed Joseph and wife Esther Digiovanni, who both burned to death in the same Jeep Liberty model that killed Kayla White? <sup>D</sup>



**No.**

Before the last of hundreds of questions that specify real-world historical crash incidents that ODI/NHTSA studiously did **NOT** reconstruct, we need to *re-emphasize* the following fact:

- The public mantra spewed repeatedly by FCA and FCA defense lawyers that the primary victims in Jeep crashes were injured or killed as a result of an “*ultra high energy, ultra high speed crash*” is known by FCA to be fraudulent. As NHTSA is fully aware, in each incident cited above, and the next, all victims survived the crash with little or zero injury. All were horribly injured or horribly killed as a result of post collision fires which result from implicitly defective Jeep fuel systems, systems that are not crashworthy.

H. Under ODI specification, did NHTSA conduct reconstruction tests of the actual crash incident that resulted in the manslaughter of 23-year-old expecting mother Ms. Kayla White? <sup>E</sup>



**No . . . at the behest of their superiors at FCA, DOT/NHTSA ensured that such a reconstruction would never take place by closing EA12-005 a mere three days after hearing of another Jeep fire-death . . . That additional nightmare pictured above occurred a few miles from FCA headquarters in Auburn Hills, Michigan.**



Section **G** notes the death of Joseph and Esther Digiovanni; a fire-death that occurred in the same Jeep Liberty model that resulted in the manslaughter of Kayla White. The Digiovanni horror occurred on March 11, 2014 . . . exactly seven months prior to November 11, 2014. DOT, NHTSA/ODI and FCA were fully aware of this accident. The driver of the colliding vehicle, Joshua Largent, is facing criminal prosecution.

'Failure to warn' is not merely a civil matter; it is a crime when such results in injury or death. At the very least, the moment injury/death occurs; the violation is elevated to 'Gross Criminal Negligence.'

The deposition of FCA Chairman Sergio Marchionne was ordered in the fire-death case of Remington Walden. On January 9, 2015, attorney Jim Butler is examining FCA practices relating to 'Failure to warn.' These broad FCA practices are long-standing, and were in-place during the Digiovanni-to-White timeframe of March to November 2014. Mr. Marchionne was asked:

**“Has Chrysler Group ever warned people that this gas tank on the (Jeep) Grand Cherokee is vulnerable to rear impact?”**



**“No.”** F

### **Item 3 Summary**

1. DOT/NHTSA documented that they and their superiors at FCA had no basis to make the public claim that a 'trailer hitch' was a crashworthiness "remedy," or that closure of EA12-005 was therefore justified.
2. NHTSA never "reconstructed" actual historical crashes wherein a fire-injury occurred.
3. NHTSA never "reconstructed" actual historical crashes wherein a fire-death occurred.
4. NHTSA never "reconstructed" actual historical crashes wherein a fire-injury occurred despite the fact that their "trailer hitch remedy" was present.
5. NHTSA never "reconstructed" actual historical crashes wherein a fire-death occurred despite the fact that their "trailer hitch remedy" was present.
6. Being cagey, NHTSA "reconstructed" only crashes wherein fire-injury or fire-death did **NOT** occur.
7. Despite the March 11, 2014 fire-death of Joseph and Esther Digiovanni **in a Jeep Liberty**; not only was Kayla White **not** warned . . . but in the context of the Marchionne testimony, and at the direction of DOT, NHTSA and FCA, the Chrysler Jeep dealership **TOLD HER THE EXACT OPPOSITE !** That conveyance, and everyone associated with it, must be subjected to criminal scrutiny . . .

**“Decades of Criminal Activity”**

Since your receipt of Reference 1, I have been informed that your office has inquired about my person. This is understandable, and expected. I can assure you that I have been fully vetted. However, in the alternative, on Page 29 of Reference 1 I stated:

**“It must be emphasized that we are dealing with organizations that are jointly guilty of decades of criminal activity.”<sup>G</sup>**

Seeking to avoid, even in the slightest, the suggestion that my Subject efforts are anything less than professional, but seeking to assist your office with the vetting process in the context of the quote above, I offer what has come to be called **“the Tyrrell email”** (Attachment 3). This document was openly filed in the Oakland County Court, next to the Oakland County Coroner’s Office where the autopsy of Kayla White was performed. This February 29, 2000 email documents (the ongoing) FCA defense lawyer efforts to ensure that critical safety information remains muzzled from public view. Openly copied and received by scores of internal/external FCA lawyers, but with no ethical or Bar membership trepidations whatsoever, former FCA lead national counsel declared to them on his last page:

**I intend to spend considerable time with Sheridan going through his 20-page affidavit and its 50 exhibits to pin him down precisely to documents, persons, etc. This affidavit should be shown to other members of the Door Hardware Work Team and the NS SLT. In the past those employees never seemed to become incensed or outraged by Sheridan's statements. Perhaps this affidavit will help them in that regard.**

**This guy is not going away any time soon.**

**David**

The acronym “SLT” refers to the Safety Leadership Team, an internal group that I chaired for two years at the behest of former Chrysler Chairman Lee Iacocca (Attachment 4). I briefly introduced you to my former role on Page 12 of Reference 1. It should be noted that several of the law firms copied by the Tyrrell email have worked in behalf of FCA in defense of Jeep fire-injury and/or fire-death litigations.

Relating to my Reference 1 quote above . . . the suborning of perjury is a criminal offence.<sup>H</sup>

**Walden versus FCA Retrial Motion**

Since your receipt of Reference 1, FCA has filed for a re-trial in the case of Walden versus FCA, et al. In this matter, the jury awarded Walden \$150,000,000.00 for the fire-death of 4-year-old Remington. The jury was also instructed to assess fault levels for the nightmare that the boy and his family have endured:

- Driver of the vehicle that collided with defective Jeep where Remington was a passenger: **1%**
- Fiat-Chrysler Automotive (FCA), the group that designed/profited from sale of defective Jeeps: **99%**

The “paper barrage” is not new to FCA defense lawyers. But when one estimates the cost to the corporation of these defense bar antics, versus the relatively miniscule funding levels and managerial competence required to make automotive product free of such blatant defects *a priori*, one must also simultaneously conclude that upper management never learned the fine art of addition & subtraction.

If a re-trial is ordered, DOT/NHTSA and FCA can assume the ongoing validity of the conclusion made in Mr. Tyrrell’s email.<sup>I</sup>

**NHTSA to Consider Reopening Investigation of Jeep Fuel Tanks**

Following the \$150,000,000.00 verdict in Walden, the Center for Auto Safety (CAS) in Washington, D.C. issued the following statement:

*“ The \$150 million verdict in Walden vs Chrysler rebukes the deal cut by former DOT Secretary Ray LaHood, former NHTSA Administrator David Strickland and Chrysler CEO Sergio Marchionne in a secret meeting in Chicago to conduct a sham recall using a fake trailer hitch that can't even tow. Strickland, who arranged the deadly meeting in a series of 23 emails that excluded NHTSA professional (ODI) staff from participating, is now a lawyer with a law firm that represents Chrysler and failed to recuse himself from the Jeep investigation even though he planned to join the law firm.*

*CAS Executive Director Clarence Ditlow said: ‘ The \$150 million verdict will not bring back 4-year old Remi Walden who burned to death in a child booster seat or any of the other victims in the 395 fatal fire crashes of the 1993-2004 Jeep Grand Cherokee, 1993-2001 Jeep Cherokee and 2002-2007 Jeep Liberty covered by NHTSA's now closed investigation. The Center for Auto Safety calls on new NHTSA Administrator Mark Rosekind and DOT Secretary Anthony Foxx to reopen the Jeep Fuel Tank investigation closed under the influence of a former NHTSA Administrator headed for a law firm representing Chrysler in a secret meeting without the participation of NHTSA professional staff.’ ” J*

I can assure you; were it not for the verdict and CAS, the following NHTSA public relations oriented response would not have been hurriedly issued. Dr. Rosekind stated at the New York Auto Show:

***“Everything is on the table for us to look at.” K***

Since that reactionary PR statement, nothing substantive has occurred. One item I am hereby adding to the “table” is my preliminary analysis of the manslaughter of 23-year-old, expecting mother, Michigan resident and taxpayer, Ms. Kayla White (Attachment 5).

I would be pleased if Dr. Rosekind, shunning the elitist legal protections offered to government officials in civil matters, appeared in behalf of the plaintiff at the upcoming civil trial of White versus FCA, Jim Riehl's Friendly Chrysler Jeep, et al. While under oath Dr. Rosekind could explain to the jury how many times, in his previous and esteemed role as Chairman of the National Transportation Safety Board (NTSB), he and the NTSB staff advocated the use of a trailer hitch as a crashworthiness defect “remedy.”

**Conclusion**

Again, on May 7, 2015 I telephoned your office for the purpose of scheduling a meeting to discuss with you the subject and references. I will be telephoning your office in approximately three weeks to schedule a meeting with you, preferably in your Lansing office.

In the meantime, please re-read paragraph 7 of the Item 3 Summary on page 7 above.

Respectfully.

Paul V. Sheridan

## ENDNOTES

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A <http://pvsheridan.com/Sheridan2Schuette-1-23April2015.pdf>

B [https://www.youtube.com/watch?v=TH\\_0izSyPk0](https://www.youtube.com/watch?v=TH_0izSyPk0)

C <https://www.youtube.com/watch?v=3xCQFEwgxYE>

<https://www.youtube.com/watch?v=FvHOp5sa-P0>

<https://www.youtube.com/watch?v=Mw07BU3g4ZY>

D <https://www.youtube.com/watch?v=KV2CnFIIN2M>

E <https://www.youtube.com/watch?v=trhw7MM34mU>

<http://www.hopcroftfuneraldirectors.com/obituaries/Kayla-White/>

F <https://www.youtube.com/watch?v=LW9Uw09MDA>

G <http://pvsheridan.com/Sheridan2Reno-27Oct1999.pdf>

H <http://pvsheridan.com/SheridanCornellEthics.pdf>

I <http://www.wsj.com/articles/chrysler-seeks-new-trial-in-georgia-jeep-fire-case-1431057280>

J <http://www.autosafety.org/cas-statement-150-million-walden-jeep-fire-judgment>

K <http://www.detroitnews.com/story/business/autos/chrysler/2015/04/09/nhtsa-may-reopen-jeep-suv-fire-probe/25519365/>

<http://washpost.bloomberg.com/Story?docId=1376-NMJH8G6JTSES01-4DCRNRUP5843E57FPFIQMEH45D>

# ATTACHMENT 1

11 May 2015

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

**Subject:** Criminal Investigation of those Responsible for the Manslaughter of Ms. Kayla White  
Reference 1: My Letter to You of 23 April 2015 (Same Subject)  
Reference 2: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

## Twelve Pages

NHTSA Chief Counsel O. Kevin Vincent forwarded to FCA the SPECIAL ORDER DIRECTED TO CHRYSLER. Dated July 2, 2014, Mr. Vincent states:

*“Shortly after receipt of Chrysler’s June 18, 2013 Part 573 Report, Chrysler officials and members of NHTSA’s Office of Defects Investigation (ODI) began discussions centering on the effectiveness of Chrysler’s proposed remedy . . . Although ODI staff agreed that addition of the trailer hitches would, as a general proposition, stiffen the rear structure of the vehicles, ODI remained concerned about the ability of the hitches to mitigate the risk of fire in low and moderate speed rear impacts.”*

In other words, the working level people at NHTSA, the ODI, were concerned that “Chrysler’s proposed remedy” could not even protect in low speed impacts, let-alone in the scenario that killed Kayla and her unborn son. But even this “*low and moderate speed*” wording is cagey. Mr. Vincent continues:

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

**UNITED STATES DEPARTMENT OF TRANSPORTATION  
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

1200 New Jersey Avenue, SE  
West Building, W41-326  
Washington, DC 20590

**In re:** )  
 )  
EA12-005 )  
NHTSA Recall No. 13V-252 )  
 )

**SPECIAL ORDER DIRECTED TO CHRYSLER GROUP LLC**

To:

Reginald Modlin, Director  
Regulatory Affairs  
Chrysler Group LLC  
800 Chrysler Drive, CIMS 482-00-91  
Auburn Hills, MI 48326-2757

This Special Order is issued by the Secretary of Transportation pursuant to 49 U.S.C. § 30166(g)(1)(A) and 49 C.F.R. §§ 510.7 and 510.8, and pursuant to a delegation of authority to the Chief Counsel of the National Highway Traffic Safety Administration (“NHTSA”), an Operating Administration of the United States Department of Transportation.

On June 18, 2013, Chrysler Group LLC (“Chrysler”) notified NHTSA that it agreed to conduct a voluntary recall of approximately 1,560,000 model year (“MY”) 2002-2007 Jeep Liberty (KJ) and MY 1993-1998 Jeep Grand Cherokee (ZJ) vehicles. Chrysler further stated that it would conduct a voluntary service campaign directed at an undisclosed number of MY 1999-2004 Jeep Grand Cherokee (WJ) vehicles. Chrysler’s report (“Part 573 Report”) stated that Chrysler would notify its customers of the safety recall for the Jeep Grand Cherokee (ZJ) and the Jeep Liberty (KJ) following the notification procedures contained in Section 577.7 of the

agency's regulations, and provide six quarterly reports of campaign completion, consistent with Section 573.7 of the agency's regulations. NHTSA has designated this recall as NHTSA Recall No. 13V-252.

Chrysler's June 18, 2013 Part 573 Report pledged that Chrysler would provide a structural improvement to the MY 1993-1998 Jeep Grand Cherokee (ZJ) and MY 2002-2007 Jeep Liberty (KJ) to mitigate the risks of fuel leaks in low-speed collisions. To that end, Chrysler stated it would take the following actions:

1. Written notification to all owners inviting them to bring in their vehicles for a free inspection of the rear structure
2. For any affected vehicle that has no trailer hitch, a Chrysler trailer hitch will be installed free of charge, provided the condition of the vehicle can support proper installation
3. For any affected vehicle that has an aftermarket trailer hitch, the area surrounding the installation will be inspected for any evidence of sharp edges or other puncture risks. If any such issues are identified, a Chrysler trailer hitch will be installed free of charge, provided the condition of the vehicle can support proper installation
4. For any affected vehicle that has an original equipment trailer hitch installed, the area around the installation will be inspected and, if no installation problems are identified, the vehicle will be released. If the inspection identifies an installation issue, it will be remedied free of charge.

Shortly after receipt of Chrysler's June 18, 2013 Part 573 Report, Chrysler officials and members of NHTSA's Office of Defects Investigation (ODI) began discussions centering on the effectiveness of Chrysler's proposed remedy. Although ODI staff agreed that addition of the trailer hitches would, as a general proposition, stiffen the rear structure of the vehicles, ODI remained concerned about the ability of the hitches to mitigate the risk of fire in low and moderate speed rear impacts. In response to ODI's concerns, Chrysler provided drawings of the hitches and a limited set of test data. In ODI's view, the test data provided by Chrysler was

insufficient. However, when asked, Chrysler indicated that it would not conduct any testing or supply more data.

Due to concerns about the effectiveness of the proposed remedy, particularly in light of the safety risks posed by rear-impact fuel leaks and fires, NHTSA decided to take the unusual step of conducting its own test program to assess the performance of the hitch in mitigating the risk of fuel leaks and fire in rear crashes. The NHTSA test program, which involved a series of eight rear impact crash reconstruction tests, was initiated on August 22, 2013 and concluded on January 2, 2014. After reviewing the results of this test program, NHTSA informed Chrysler on January 13, 2014 that it did not have any reservations about implementation of Chrysler's proposed remedy.

Chrysler and NHTSA began a series of discussions regarding implementation of the remedy campaign following ODI's decision that testing appeared to demonstrate the effectiveness of the trailer hitch. These discussions revealed Chrysler had waited until December 6, 2013, to select a hitch supplier and did not issue a purchase order to the hitch supplier until January 29, 2014. Chrysler reported that the first run of hitches was produced on May 14, 2014. On June 11, 2014, Chrysler reported that it would produce 1,323 KJ hitches per day and 882 ZJ hitches per day and anticipated that it would have a stockpile of over 89,000 KJ hitches and 50,000 ZJ hitches by the August 1, 2014 recall repair launch. Chrysler further stated that it would maintain this production schedule unless demand dictated otherwise.

Chrysler's June 18, 2013 Part 573 Report estimated that the safety recall would encompass approximately 1,560,000 vehicles. In recent reports provided to ODI, Chrysler states that intends to send recall notification letters to 1,515,000 MY 1993-1998 Jeep Grand Cherokee (ZJ) owners and 995,000 MY 2002-2007 Jeep Liberty (KJ) owners. Assuming that all of these



owners will respond to the notification, it will take Chrysler at least 4.7 years and 2.06 years respectively to produce the required number of Grand Cherokee and Liberty hitches at the current rate of production. In the event that only half of the notified Grand Cherokee owners respond to the notice and have the remedy installed, it would take Chrysler well over two years to produce the required parts at its present schedule.

NHTSA is therefore concerned that Chrysler does not have, and will not have, sufficient production capacity to ensure that enough hitches will be available to ensure that the recalled vehicles will be remedied expeditiously. For many owners, a recall remedy deferred by parts availability easily becomes a defect remedy denied. Moreover, additional delays in implementing this recall will inure to Chrysler's benefit at the expense of vehicle owner safety. Although NHTSA acknowledges that recall campaigns may have low completion rates for any number of reasons, the agency has no intention of allowing Chrysler, or any other manufacturer, to delay recall completion to the detriment of safety. NHTSA is therefore issuing this Special Order to obtain information regarding Chrysler's data collection, planning and decision-making in regard to its implementation of the recall remedy in this case.

Chrysler's response to this Special Order must be provided by **July 16, 2014**. Chrysler's response must be signed under oath, i.e., accompanied by an affidavit, signed by a responsible officer of Chrysler, stating that he/she has undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, that he/she has caused the documents of Chrysler to be searched diligently for information and documents responsive to this Special Order and produced them to NHTSA, and that the answers to the inquiries provided to NHTSA respond completely and correctly to this Special Order. 49 U.S.C. § 30166(g)(1)(A); 49 C.F.R. § 510.7. Failure to respond fully or truthfully to this Special

Order may result in a referral to the United States Department of Justice for a civil action to compel responses, and may subject Chrysler to civil penalties of up to \$7,000 per day, up to a maximum penalty of \$35,000,000 for a related series of daily violations. 49 U.S.C. §§ 30163(a)(1), 30165(a)(3); 49 C.F.R. § 578.6(a)(3). Falsifying or withholding information in response to this Special Order may also lead to criminal penalties of a fine or imprisonment of up to 15 years, or both. 49 U.S.C. § 30170(a)(1).

### **DEFINITIONS**

To the extent used in this Special Order, the following definitions apply:

1. **“Affiliates”** means a corporation that is related to another corporation (such as a subsidiary, parent, or sibling corporation) by shareholdings or other means of control.
2. **“Agent”** means an individual, such as a representative, who is authorized to act for or in place of another.
3. **“Defect”** or **“Defect condition”** means the defect that is the subject of NHTSA Recall No. 13V-252.
4. **“Describe”** means to provide, with respect to any act, occurrence, transaction, event, statement, communication, or conduct (hereinafter, collectively, “act”), all facts concerning any such act, including, but not limited to, a description of each act, and the date, the location, and the names and addresses of all persons involved.
5. **“Document(s)”** is used in the broadest sense of the word under Rule 34 of the Federal Rules of Civil Procedure, and includes all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, electronic communications (existing in hard copy

and/or in electronic storage), invoices, contracts, agreements, manuals, publications, photographs of all types, and all mechanical, magnetic, and electronic records or recordings of any kind. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

6. **“Employee”** means a person who works in the service of another person (the employer) under an express or implied contract of hire, under which the employer has the right to control the details of work performance.

7. **“Chrysler”** means Chrysler Group LLC, its predecessors, all of their past and present officers and employees, whether assigned to their principal offices or any of their field or other locations, including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Chrysler (including all business units and persons previously referred to).

8. **“Identify”, “identity” or “identification,”** with respect to a person, means to provide that person’s name, title or position, employer, and last known business address and telephone number. With respect to a document, means the date (or time period covered if not dated), nature of document, author, and recipient(s). With respect to a business, means to provide the corporate address, name of its principals, telephone number, and name and address of the agent for service. With respect to a website, means the url of the site, the name and address of the owner of the site and the name and address of administrator of the website.

9. **“Subject Trailer Hitch”** means the trailer hitch being offered as a remedy in the vehicles subject to NHTSA Recall No. 13V-252.
10. **“Officer”** means a person who holds an office of trust, authority, or command, such as a person elected or appointed by the board of directors to manage the daily operations of a corporation, such as a CEO, president, secretary, or treasurer.
11. **“Recall”** means NHTSA Recall No. 13V-252.
12. **“Subject vehicle(s)”** means the vehicles subject to NHTSA Recall No. 13V-252.
13. **Other Terms.** To the extent that they are used in these requests, the terms “claim,” “consumer complaint,” “dealer field report,” “field report,” “fleet,” “good will,” “make,” “model,” “model year,” “notice,” “type,” “warranty,” “warranty adjustment,” and “warranty claim,” whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

### **INSTRUCTIONS**

1. Your response to the Special Order shall be sent to Office of the Chief Counsel (NCC-111), National Highway Traffic Safety Administration, West Building, W41-326, 1200 New Jersey Avenue, SE, Washington, DC 20590.
2. Please repeat the applicable request verbatim above your response. After your response to each request, identify the source of the information and indicate the last date the information was gathered.
3. When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation. Please also be reminded that where a document responsive to a request is not in the English language, both the original document and an English translation of the document must

be produced.

4. You are required to respond to every request listed in this Special Order. If you cannot respond to any specific request or subpart(s) thereof, please state the reason why you are unable to do so. If you are unable to respond because you do not have all or any of the precise information needed to respond, provide an estimate. If, on the basis of attorney-client, attorney work product, or other privilege, you do not submit one or more requested documents or items of information in response to this Special Order, you must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

5. The response to this Special Order, including the document requests, must be submitted in duplicate, together with a copy of any confidentiality request, to this office by the deadline stated above.

6. If you claim that any of the information or documents provided in response to this Special Order constitutes confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or is protected from disclosure pursuant to 18 U.S.C. § 1905, you must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 C.F.R. Part 512, to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, West Building, W41-326, 1200 New Jersey Avenue, SE, Washington, DC 20590. You are required to submit two copies of the documents containing allegedly confidential information and one copy of the documents from which information claimed to be confidential has been deleted. Failure to adhere to the requirements of

49 C.F.R. Part 512 will result in a rejection of your request for confidential treatment.

7. The singular includes the plural; the plural includes the singular. The masculine gender includes the feminine and neuter genders; and the neuter gender includes the masculine and feminine genders. “And” as well as “or” shall be construed either disjunctively or conjunctively, to bring within the scope of this Special Order all responses that might otherwise be construed to be outside its scope. “Each” shall be construed to include “every” and “every” shall be construed to include “each.” “Any” shall be construed to include “all” and “all” shall be construed to include “any.” The use of a verb in any tense shall be construed as the use of the verb in a past or present tense, whenever necessary to bring within the scope of the document requests all responses which might otherwise be construed to be outside its scope.

8. Chrysler’s response to this Special Order must be under oath, i.e., accompanied by an affidavit, signed by a responsible officer of Chrysler, stating that he/she has undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, that he/she has caused the documents of Chrysler to be searched diligently for information and documents responsive to this Special Order and produced them to NHTSA, and that the answers to the inquiries provided to NHTSA respond completely and correctly to this Special Order.

### **REQUESTS**

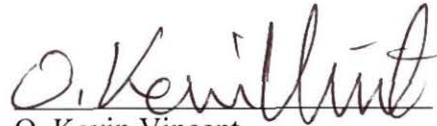
1. Separately for each model and model year vehicle provide Chrysler’s count of vehicles currently registered for use on the public roads of the various states and territories of the United States.

2. Separately for each model and model year vehicle provide Chrysler's count of owner notification letters that Chrysler will send owners pursuant to 49 CFR Part 577 and its schedule for mailing these letters.
3. Separately for each model provide Chrysler's analysis of the anticipated recall remedy completion rate including, but not limited to:
  - a. Any and all financial projections and/or financial reserves associated with completion of recall 13V-252.
  - b. Any and all analyses of the projected owner demand for the remedy.
  - c. The relationship between parts availability and recall remedy completion rates including the impact of wait times on owner behavior in this instance and safety recalls in general.
  - d. The extent to which the anticipated completion rate in 13V-252 differs from completion rates commonly established by Chrysler as targets in safety recalls.
4. State whether it is Chrysler's common practice to rely on a single supplier for critical components in production vehicles. If the answer to the foregoing is in the negative, please state why Chrysler is relying on a single supplier with tooling and welding jigs capable of fabricating only 1,323 KJ hitches per day and 882 ZJ hitches per day.
5. Provide Chrysler's analysis of the number of suppliers in the United States, Canada and Mexico with the capability of manufacturing the subject trailer hitches to Chrysler's specifications. Identify each such supplier and Chrysler's estimate of that supplier's production capacity.

6. Provide any and all analyses supporting Chrysler's determination that production of 1,323 KJ hitches per day and 882 ZJ hitches per day will be adequate to provide a remedy for the subject vehicles within the following time periods:
  - a. 7 days after the owner requests that the remedy be provided or otherwise presents the vehicle for repair.
  - b. 15 days after the owner requests that the remedy be provided or otherwise presents the vehicle for repair.
  - c. 30 days after the owner requests that the remedy be provided or otherwise presents the vehicle for repair.
  - d. For each of the foregoing responses, provide Chrysler's estimate of the percentage of vehicle owners seeking application of the remedy who could have their vehicles remedied within the allotted time.
7. Separately for each model provide Chrysler's analysis of the maximum production capacity of the supplier currently producing the subject trailer hitches. State whether the maximum production capacity of this supplier is sufficient to complete the recall campaign within eighteen months of August 1, 2014 if all owners receiving notification from Chrysler elect to have the remedy applied to their vehicles. If the answer to the foregoing is in the negative, state the percentage of owners who would be able to obtain the remedy within the aforementioned time period if the current supplier of the subject trailer hitch is working at maximum capacity.
8. Provide Chrysler's assessment of the lead time required to begin volume production of the subject trailer hitches by additional suppliers and the costs associated with producing the required tooling and welding jigs.



Dated: July 2, 2014

  
O. Kevin Vincent  
Chief Counsel

## ATTACHMENT 2

11 May 2015

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

**Subject:** Criminal Investigation of those Responsible for the Manslaughter of Ms. Kayla White  
Reference 1: My Letter to You of 23 April 2015 (Same Subject)  
Reference 2: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

### Three Pages

*“ODI does not approve proposed defect remedies. While offering to install hitch receiver assemblies on the . . . 2002-2007 Liberty, Chrysler did not, in ODI's view, provide enough evidence demonstrating the effectiveness of the proposed remedy in rear impacts. Recognizing the nature of the concern in EA12-005 and its potential for injury and death, ODI took the unusual step of requesting that NHTSA's Vehicle Research Test Center (VRTC) conduct crash reconstruction tests of actual crash incidents that were identified during the investigation to evaluate the remedy.”*



U.S. Department of Transportation  
**National Highway Traffic Safety Administration**

# ODI RESUME

OFFICE OF DEFECTS INVESTIGATION



Authentic US Government Information  
 National Highway Traffic Safety Administration  
 uses a digital certificate to ensure  
 the content has remained unchanged

**Investigation:** EA 12-005  
**Prompted by:** DP09-005, PE10-031, FARS data  
**Date Opened:** 06/12/2012 **Date Closed:** 11/14/2014  
**Investigator:** Peter Ong  
**Subject:** Crash Related Fuel Tank Fires

## MANUFACTURER & PRODUCT INFORMATION

**Manufacturer:** Chrysler Group LLC  
**Products:** 93-04 Grand Cherokee, 93-01 Cherokee & 02-07 Liberty  
**Population:** 5,100,000  
**Problem Description:** Fuel tank system integrity in rear-impacts or crashes.

## FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
<b>Complaints:</b>	18	63	69
<b>Crashes/Fires:</b>	16	59	63
<b>Injury Incidents:</b>	9	47	53
<b>Number of Injuries:</b>	9	34	38
<b>Fatality Incidents:</b>	8	38	38
<b>Number of Fatalities:</b>	12	44	56
<b>Other*:</b>	21	0	21

\***Description of Other:** 18 fatal fires and 3 non-fatal fires (19 fatalities/20 injuries) from other sources (FARS, news media and consumer groups)

## ACTION / SUMMARY INFORMATION

**Action:** Close this Engineering Analysis (13V-252)

### Summary:

ODI has completed an extensive analysis of rear crash fuel tank system integrity data for the subject Jeep Cherokee, Grand Cherokee and Liberty vehicles (SVs). As of June 2013, ODI knew of 56 post-collision fatal fires, 28 non-fatal fires, and 6 fuel leak incidents (totaling 90 incidents, 75 fatalities and 58 injuries) involving the SVs. Based on this analysis, ODI issued a Recall Request Letter (RRL) on June 3, 2013 requesting that Chrysler recall the Grand Cherokee and Liberty vehicles due to the rate of fatal, non-fatal fire, and fuel leak incidents when compared to peer vehicles (compact and medium SUVs) built during the same time period. In the RRL, ODI described how the location of the aft-mounted fuel tank made the SVs vulnerable to rear impact crash fuel tank failures. During the analysis, besides the high speed/high severity crashes present in both the SV and peer vehicles, ODI observed a significant number of low and moderate speed rear impact crash related fires and leaks, particularly in the Liberty. The data also demonstrated that SVs originally equipped with towing hitch receivers (trailer hitches) appeared to be under-represented in rear-impact related fuel tank failures. In the RRL, ODI requested that Chrysler provide its response by June 18, 2013, otherwise NHTSA might proceed to an Initial Decision that the SVs contain a safety-related defect.

Chrysler responded to the RRL on June 4, 2013 and vigorously disputed the tentative findings of the RRL. Among other things, Chrysler argued that the SVs had an overall safety record superior to their peers, met or exceeded all applicable federal motor vehicle safety standards (FMVSS) and only experienced fires in severe high energy rear impacts. Nonetheless, while continuing to maintain that the SVs did not contain a safety-related defect, Chrysler proposed a recall (13V-252) of approximately 2.5M (1.6M currently registered) model year (MY) 1993 - 1998 Grand Cherokee (ZJ) and MY 2002-2007 Liberty (KJ) vehicles on June 18, 2013. The recall remedy submitted by Chrysler

would employ a hitch receiver assembly consisting of a steel cross-member behind the fuel tank with forward-projecting arms bolted to the frame rails on either side of the fuel tank. For the MY 1999 - 2004 Grand Cherokee, Chrysler indicated it would conduct a customer satisfaction campaign and inspect vehicles equipped with aftermarket tow hitch receivers, and if necessary, replace any such hitch receivers whose condition may increase the risk of fuel system failure in rear crashes. Examination of the available data established that the MY 1999 - 2004 Grand Cherokee did not pose the same magnitude of safety risk as the MY 1993 - 1998 Grand Cherokee and MY 2002-2007 Liberty, particularly in low and moderate speed rear impacts. Because the agency has concluded that the vehicles do not present an unreasonable risk to safety, ODI is closing its investigation of the MY 1999 - 2004 Grand Cherokee. Although it was not within the scope of the Petition initiating this investigation or the Preliminary Evaluation preceding this EA, ODI also examined the performance of the MY 1993 - 2001 Cherokee as part of this investigation. NHTSA's assessment of the available data for the Cherokee did not establish an unreasonable risk in comparison to peer vehicles.

ODI does not approve proposed defect remedies. While offering to install hitch receiver assemblies on the MY 1993-1998 Grand Cherokees and 2002-2007 Liberty, Chrysler did not, in ODI's view, provide enough evidence demonstrating the effectiveness of the proposed remedy in rear impacts. Recognizing the nature of the concern in EA12-005 and its potential for injury and death, ODI took the unusual step of requesting that NHTSA's Vehicle Research Test Center (VRTC) conduct crash reconstruction tests of actual crash incidents that were identified during the investigation to evaluate the remedy.

The proposed ZJ remedy was examined through 5 reconstruction tests (based on an August 2000 crash - ODI 869217/Chrysler 7575045) performed using a 1996 Cadillac Deville striking the rear of the ZJ at 35 mph, the estimated closing speed from the actual crash incident. In that incident, the fuel tank of the ZJ ruptured, resulting in a fire. The first three reconstructions were performed without a hitch receiver installed. For these tests, during which the striking vehicle ride height was varied to evaluate the effects of pre-impact braking, a fuel leak occurred for the first two ride-height cases. Two additional reconstructions were performed with the hitch receiver installed and using the ride height most representative of the actual crash incident (and one which previously produced a fuel leak). Neither of the reconstructions using the hitch receiver resulted in a fuel leak. Through the five reconstructions, VRTC was also able to evaluate the effects of under-ride and rear frame rail corrosion of the ZJ vehicle. VRTC's report provides additional details of the ZJ reconstructions.

The proposed Liberty remedy was examined by conducting reconstruction tests of a September 2004 rear impact fire crash (VOQ 10138726/Chrysler 1161999) where a MY 1997 Plymouth/Dodge Neon passenger car hit the rear of a Liberty at 40 mph and caused a fire that consumed the vehicle (an under-ride crash mode). The initial reconstruction test was performed without the hitch receiver, resulting in a significant fuel leak from a ruptured fuel tank. No fire occurred because the tank contained a non-flammable gasoline substitute. This reconstruction test was then followed by a second reconstruction with a hitch receiver installed. The fuel tank did not leak with the hitch receiver installed.

In addition, shortly after the RRL was issued, ODI learned of a May 2013 rear crash (VOQ 10512282) involving a large pickup (traveling at 43mph) that struck a Liberty equipped with an original equipment hitch receiver. A towing draw bar was installed in the hitch receiver at the time of the crash. An inspection indicated that the striking vehicle had hit the draw bar, fracturing the hitch receiver's transverse cross-member and puncturing the fuel tank. Because the presence of the removable draw bar appeared to cause the hitch failure and subsequent fuel leak, ODI further requested that VRTC perform an additional test to reconstruct this incident without the removable draw bar installed in the Jeep hitch receiver. VRTC's eighth and final reconstruction test showed that when the draw bar was not installed, the hitch receiver did not break, and the fuel tank was not punctured as it was in the actual crash incident. Additional information on each of the above crash reconstruction tests is provided in VRTC's EA12-005 Reconstruction Test Report, available at <http://www-odi.nhtsa.dot.gov/acms/cs/jaxrs/download/doc/UCM458003/INRP-EA12005-59675.pdf>.

VRTC's testing demonstrates that the Chrysler hitch receiver provides incremental safety benefits in certain low and moderate speed crash incidents (particularly those where the Liberty and ZJ Grand Cherokee without hitch receivers performed poorly compared to their peers). Once the reconstruction tests were completed and analyzed, ODI notified Chrysler that the proposed remedy demonstrated incremental improvements in rear crash performance and the agency did not have any reservations about Chrysler implementing the remedy. Chrysler then determined that it would proceed with its remedy plan. ODI notes that in terms of crash severity, the VRTC reconstruction tests involved vehicle to vehicle impacts with crash energies ranging from ~154,000 to ~370,000 ft./lbs. (~209,000 to ~502,000 N m). In addition, ODI requested that Chrysler notify owners that the draw bar should be removed from the hitch receiver when not towing a trailer. The remedy will not necessarily be effective in the most severe crashes - where peer vehicles performed similarly to the Liberty and ZJ Grand Cherokee - but ODI believes the Chrysler remedy will

produce safety benefits sufficient to increase the fuel tank system integrity of the recalled vehicle population to a level similar to that of their peers. Accordingly the investigation is closed.

The ODI reports cited in the table above can be reviewed online at <http://www-odi.nhtsa.dot.gov/owners/SearchSafetyIssues> under the following identification (ODI) numbers:

Grand Cherokee: 506249, 549376, 734783, 869217, 10009553, 10335943, 10351589, 10351980, 10357528, 10465228, 10499041, 10515310

Liberty: 10138726, 10149256, 10181332, 10357195, 10366653 (duplicate of 10357195)

Cherokee: 10409104

# ATTACHMENT 3

11 May 2015

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

**Subject:** Criminal Investigation of those Responsible for the Manslaughter of Ms. Kayla White  
Reference 1: My Letter to You of 23 April 2015 (Same Subject)  
Reference 2: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

Ten Pages

I intend to spend considerable time with Sheridan going through his 20-page affidavit and its 58 exhibits to pin him down precisely to documents, persons, etc. This affidavit should be shown to other members of the Door Hardware Work Team and the NS SLT. In the past those employees never seemed to become incensed or outraged by Sheridan's statements. Perhaps this affidavit will help them in that regard.

This guy is not going away any time soon.

David



Attorneys at Law

Mikal C. Watts  
Attorney at Law

Telephone: (361) 887-0500  
Facsimile: (361) 887-0055

March 24, 2000

Mr. Thomas Kienbaum  
KIENBAUM, OPPERWALL, HARDY & PELTON, P.L.C.  
325 South Old Woodward Avenue  
Birmingham, Michigan 48009  
Phone: (248) 645-0000

Via Fax: (248) 645-1385

Re: *LeCompte v. DCC*

Dear Mr. Kienbaum:

I am in receipt of your letter of yesterday<sup>1</sup> wherein you seek to "confirm" my conversation with Florida counsel. First, judging by your recitation of the same, you confirm incorrectly. Second, the fact is that the David Tyrell E-mail<sup>2</sup> has already been widely disseminated by me and others to other persons in the plaintiffs' automotive defect bar. Discovery efforts already are specifically being planned and coordinated among the several hundred truth-seeking members of AIEG to depose each of the members of the Door Hardware Workteam and the NS Safety Leadership Team in order to document DCC's concerted and now-documented efforts to cause its employees "to become incensed or outraged" at Paul Sheridan's willingness to tell the truth. Third, I can assure you that an E-mail planning a concerted smear campaign at a material witness in Texas litigation is not protected by the attorney-client privilege under either Texas or Florida law. If you disagree, I encourage your client to seek the opinion of a Nueces County, Texas judge with jurisdiction over my mouth and my mailbox, or one with jurisdiction over the Attorneys' Information Exchange Group in Birmingham, Alabama. Finally, I am shocked at the temerity of your firm and your client to once again seek a court-imposed "muzzle" on one of the truly honorable whistleblowers this country has ever seen, who according to your client's own national counsel, Mr. Tyrrell, "was at Chrysler for an extended period of time, had a good work history according to his late reviews and awards," and who is "organized, obsessive, detailed," and who "will present a ... superior appearance as a witness."

Imagine the safety that could have been incorporated into Chrysler vehicles over the past five years had your firm not been successful in keeping Chrysler's conduct completely sealed from public view through a now-lapsed "gag order." The Honorable court handling your case against Sheridan, who no doubt initially decided the issue

<sup>1</sup> Attached hereto as Exhibit "A" for your reference.

<sup>2</sup> Attached hereto as Exhibit "B" for your reference.

Corpus Christi • Brownsville

Mr. Thomas Kienbaum  
March 24, 2000  
Page Two

based upon your firm's and your client's representations, was entirely correct in his recent decision to let the injunction lapse.

Although I am not certain whether Damler's Germany recognizes a first amendment right to free speech,<sup>3</sup> I am certain your client's American subsidiary, Chrysler, is well aware of the fact that this country does recognize free speech rights.

Certainly providing truthful testimony in a brain-damaged baby case involving a vehicle defectively designed between seven and ten years ago should be applauded, instead of responded to by your former employer seeking to extend a five-year muzzle on entirely specious grounds.

I trust you advised the Honorable court that Sheridan was designated as a material fact witness early-on in that litigation by the Plaintiffs.<sup>4</sup> I trust that in your "motion to re-muzzle", you advised the Honorable court that Sheridan's affidavit references only documents produced to me in litigation, which according to the terms

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<sup>3</sup> Attached hereto as Exhibit "C" for your reference.

<sup>4</sup> As Justice Ginsberg recently noted in *Baker v. General Motors*: "Most essentially, Michigan lacks authority to control courts elsewhere by precluding them, in actions brought by strangers to the Michigan litigation, from determining for themselves what witnesses are competent to testify and what evidence is relevant and admissible in their search for the truth. See Restatement (Second) of Conflict of Laws, 137-139 (1969 and rev.1988) (forum's own law governs witness competence and grounds for excluding evidence); cf. *Societe Nationale Industrielle Aerospatiale v. United States Dist. Court for Southern Dist. of Iowa*, 482 U.S. 522, 544, n. 29, 107 S.Ct. 2542, 2556, n. 29, 96 L.Ed.2d 461 (1987), (foreign "blocking statute" barring disclosure of certain information "do[es] not deprive an American court of the power to order a party subject to its jurisdiction to produce [the information]"); *United States v. First Nat'l City Bank*, 396 F.2d 897 (C.A.2 1968) (New York bank may not refuse to produce records of its German branch, even though doing so might subject the bank to civil liability under German law)... In sum, Michigan has no authority to shield a witness from another jurisdiction's subpoena power in a case involving persons and causes outside Michigan's governance. Recognition, under full faith and credit, is owed to dispositions Michigan has authority to order. But a Michigan decree cannot command obedience elsewhere on a matter the Michigan court lacks authority to resolve. See *Thomas v. Washington Gas Light Co.*, 448 U.S. 261, 282-283, 100 S.Ct. 2647, 2661, 65 L.Ed.2d 757 (1980) (plurality opinion) ("Full faith and credit must be given to [a] determination that [a State's tribunal] had the authority to make; but by a parity of reasoning, full faith and credit need not be given to determinations that it had no power to make.").

In *LeCompte*, Judge J. Ray Gayle accepted Mr. Sheridan's affidavit as evidence, and made no pronouncement from the bench that Mr. Sheridan was not welcome to testify in his courtroom.



Mr. Thomas Kienbaum  
March 24, 2000  
Page Three

of those cases' protective orders, are no longer confidential.<sup>5</sup> I trust that in your motion to re-muzzle, you have advised the Honorable court that Sheridan's testimony involves a vehicle line which has been on the road for years, subject to vehicle tear-downs and competitive engineering, and a vehicle line which already is entirely being replaced by Chrysler with its "RS" line of minivans whose designs have been completed by the date of this writing.<sup>6</sup> I trust you advised the Court that of the previously-produced documents referenced in Sheridan's affidavit, the vast majority of them were produced in a deposition that Chrysler's employment law firm, Dickinson, Wright, defended<sup>7</sup>, and that therefore, any attempt by Chrysler to insinuate that Sheridan disclosed "new" information would be a gross fraud on the Court. I trust that in your motion to re-muzzle, you advised the Honorable court that Sheridan's affidavit testimony was confirmed in almost every respect by the deposition testimony of Chrysler's own corporate representative in *LeCompte*.<sup>8</sup>

In Texas, one of our great Supreme Court justices, Hon. Franklin Spears, wrote that "the ultimate purpose of discovery is to seek the truth, so that disputes may be decided by what the facts reveal, not by what facts are concealed."<sup>9</sup> In an effort to have disputes decided across the nation by "what facts are concealed," your client has, in my humble opinion wrongfully terminated an honorable man, disgracefully trumped-up charges against him that subsequently have been proven meritless, and shamefully shackled him with a gag order lasting five years, even though your own client's fellow employees showered him with glowing praise in performance reviews just weeks before Chrysler wrongfully terminated him. I would suggest that if Chrysler believes Paul Sheridan is such a threat, it immediately should permit me to depose all persons whom it believes will prove him a liar. We can then compare their sworn testimony with the representations made by your firm in Court in the *Chrysler v. Sheridan* litigation, and see whether it is Paul Sheridan or his former employer that is spreading falsehoods.

---

<sup>5</sup> See Rule 76a Order of 1996 of Anderson County, Texas District Court Judge Calhoun in *Matthews v. Chrysler*.

<sup>6</sup> See testimony of Dennis Malecki in *LeCompte v. Chrysler*.

<sup>7</sup> See Deposition of Paul Sheridan, in *Gonzalez/Matthews v. Chrysler*, dated May 2, 1996.

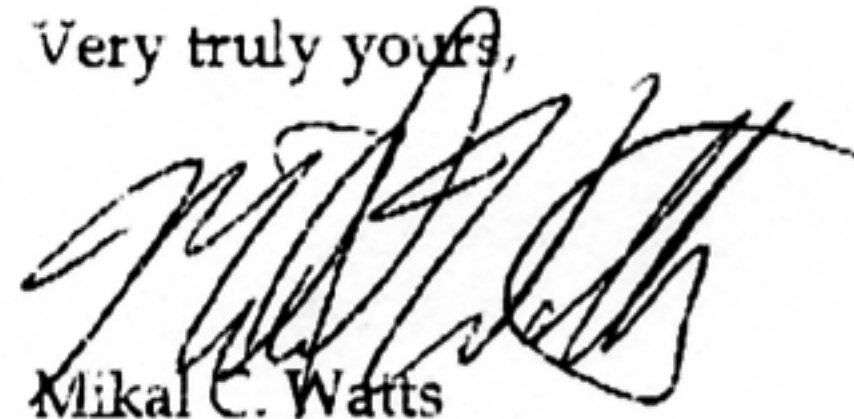
<sup>8</sup> See Deposition of David Monette in *LeCompte v. Chrysler*, dated February 29, 2000.

<sup>9</sup> *Jampole v. Touchy*, 673 S.W.2d 569 Tex. 1984).

Mr. Thomas Kienbaum  
March 24, 2000  
Page Four

I hope this letter will assist you in clarifying our respective positions on this matter.

Very truly yours,



Mikal C. Watts

P.S.:

I have just received a copy of your Brief in support of Chrysler's Motion to re-Muzzle. Among the myriad misrepresentations made therein, the one containing particularly-strong stench to me is your blatant lie to the Court with respect to how the *Matthews* documents became public. To insinuate that those documents were made public by me filing them behind Chrysler's back is shameful; in fact, Judge Calhoun conducted a five-hour hearing before ruling that the documents should be released according to Rule 76a. You may want to pull up the *Dallas Morning News* coverage of the hearing to refresh your recollection, so that you can file a retraction of this falsehood with the Court immediately.

cc:

Richard Greenberg - *60 Minutes*  
Bill Vlassic - *Detroit News*  
Milo Geyelin - *Wall Street Journal*  
Jeffrey Ball - *Wall Street Journal* - Detroit Bureau  
AIEG Executive Committee

Via Fax: (212) 975-0322  
Via Fax: (313) 222-1461  
Via Fax: (212) 416-2653  
Via Fax: (313) 963-6527

MAR. 23, 2000 3:13PM

KIENBAUM OPPERWALL

NO. 2291

P. 1

**KIENBAUM OPPERWALL  
HARDY & PELTON, P.L.C.  
ATTORNEYS AND COUNSELORS**

**FILE COPY**

791  
mcw  
JGW  
JLB  
my

325 South Old Woodward Avenue  
Birmingham, Michigan 48009  
Phone (248) 645-0000  
Fax: (248) 645-1385

**FACSIMILE TRANSMISSION SHEET**

**Date:** March 23, 2000  
**To:** Mikal C. Watts  
**Fax #:** (361) 887-0055  
**Phone:**  
**Total Pages:** 3, including this cover sheet  
**From:** Thomas G. Kienbaum  
**Regarding:** LeCompte v. DCC

If you have not received the total number of pages, please call 248-645-0000. Thank you.

**MESSAGE:**

**IMPORTANT:** This facsimile transmission contains confidential and/or legally privileged information intended only for the use of the individual(s) named on the transmission sheet. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this facsimile transmission is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original facsimile to us at the above address via U.S. Postal Service. Thank you.

**RECEIVED**  
MAR 23 2000

BY:.....

EXHIBIT "A"

03/24/2000 14:12 FAX 361 887 0055

HARRIS AND WATTS

007

MAR. 23. 2000 3:13PM

KIENBAUM OPPERWALL

NO. 2291 P. 2

**KIENBAUM OPPERWALL  
HARDY & PELTON, P.L.C.**  

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**ATTORNEYS AND COUNSELORS**

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Fax (313) 961-3945

March 23, 2000

**Via Facsimile (361) 887-0055**

Mikal C. Watts, Esquire  
Harris & Watts, P.C.  
555 N. Carancahua  
Tower II. Building, Suite 1630  
Corpus Christi, TX 78478

**Re: LeCompte v. DCC**

Dear Mr. Watts:

This letter will confirm the conversation you had with Bob Fulton today concerning David Tyrrell's e-mail to DaimlerChrysler Corporation's counsel, Rita Burns. Mr. Tyrrell's e-mail related to Paul Sheridan's affidavit in LeCompte v. DaimlerChrysler Corporation. As Bob explained to you, this e-mail was inadvertently attached to an exhibit to a motion filed on behalf of DaimlerChrysler Corporation in the action pending against Mr. Sheridan. Mr. Tyrrell's e-mail is clearly a privileged attorney-client communication, and it is obvious that its disclosure was inadvertent. I am filing a motion today to remove the attorney-client communication from the pleading filed recently in the Oakland County Circuit Court, and to obtain return of any distributed copies. I understand you will not hereafter distribute the inadvertent attorney-client communication that you received from Mr. Sheridan's counsel, Courtney Morgan, until you hear further on the matter.

3/24/2000 14:12 FAX 361 887 0055

HARRIS AND WATTS

MAR. 23. 2000 3:13PM

KIENBAUM OPPERWALL

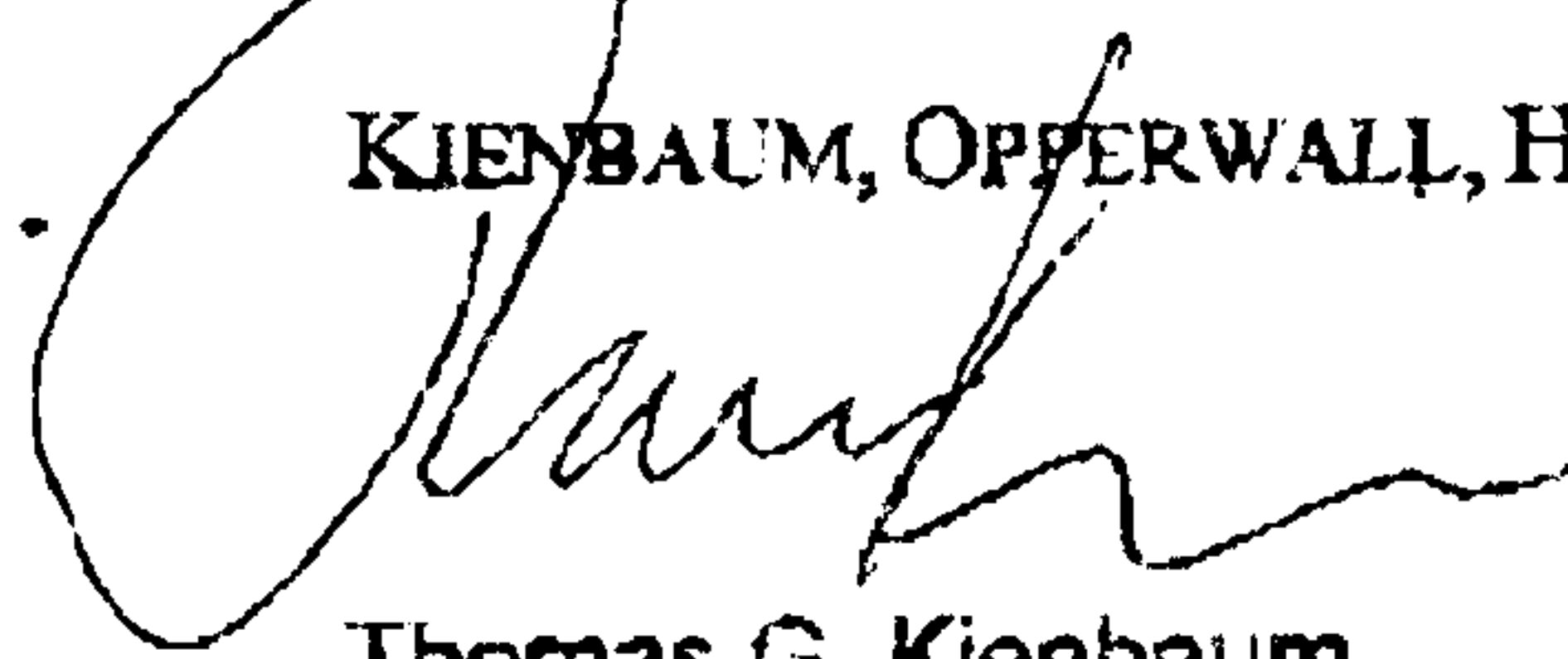
NO. 2291 P. 3 <sup>008</sup>

Mikal C. Watts, Esquire  
March 23, 2000  
Page 2

If you have any questions in this regard, please give me a call. We appreciate your cooperation.

Very truly yours,

KIENBAUM, OPPERWALL, HARDY & PELTON



Thomas G. Kienbaum

cc: David R. Tyrrell  
Rita Burns  
Gregory J. Ridella



David Tyrrell <dtyrrell@hwhlaw.com> on 02/29/2000 11:16:37 AM

To: "Burns Rita - Chrysler (E-mail)" <rab26@daimlerchrysler.com>  
cc: "Gluckman Ken - Chrysler (E-mail)" <kig@daimlerchrysler.com>, "Louann Van Der Wiele (E-mail)" <lv14@daimlerchrysler.com>, "Kidney Michael - Hogan & Hartson (E-mail)" <mikidney@hhlaw.com>, "Micki S. Singer (E-mail)" <mss1@sdma.com>, "Ridella Gregory (E-mail)" <gjr10@daimlerchrysler.com>, Bob Fulton <bfulton@hwhlaw.com>  
Subject: Sheridan's Affidavit - LeCompte v. DCC

Re: Sheridan's Affidavit - LeCompte v. DCC - CASE ID: 1030000

Rita,

I reviewed Watts' response to the Motion for Summary Judgment in LeCompte which includes a detailed affidavit from Paul Sheridan. Interestingly, the affidavit is executed in Texas and, therefore, apparently Sheridan has been spending time with Watts.

Sheridan's affidavit goes far beyond any subject matter we have seen in the past. I predict you are going to see a lot more of this guy in many different types of cases. He is going to become the new, improved, Tom Flanagan. He was at Chrysler for an extended period of time, had a good work history according to his late reviews and awards, and is willing to testify about Chrysler's "knowledge" on any number of different issues. I also expect he will be a librarian of information and documents. This is the role Tom Flanagan has filled in the past - Sheridan will be much better organized, obsessive, detailed, and will present a far superior appearance as a witness.

From John Stilson's report in LeCompte I anticipated that Sheridan would be used to describe Chrysler's knowledge of ejection-related issues from his NS SLT work period. I anticipated Watts would use Sheridan with Flanagan and the documents and past testimonies he developed during the liftgate latch litigation to enhance his allegation that "[Chrysler] was aware of the relationship between occupant ejection from the vehicle and the increased likelihood of death and serious bodily injury. The evidence was also clear that effective door latches were critical to prevent this, since the seat belt usage rate was very low." He wants to make latches generic and dovetail all the liftgate latch and side door latch failure issues with the side sliding door latch. Watts certainly uses Sheridan for this purpose. However, Sheridan is also used to go far beyond the "generic" latch and ejection risk issues.

Sheridan's affidavit makes extensive reference to the Door Hardware Work Team and meeting minutes from that team. The minutes were taken from Bob Vend's deposition who, of course, testified that Sheridan never attended any of those meetings and whose name does not appear as an attendee at these meetings. Therefore, Sheridan will apparently base a significant amount of his more specific testimony on meeting minutes from meetings he did not attend.

Sheridan also spends considerable time talking about the reduction of the NS budget; the "major upper management concern was product cost versus approved program target levels." He makes frequent references to cost reductions

necessitated by budget decreases. Indeed, he makes references to "upper management" decisions by Messrs. Zaton, Lutz, Gale and Castang. For example, Sheridan states "upper management at Chrysler was already aware that its new NS body minivan would not have a latch in the front of the sliding door, while most other offerings did have such a second latch. However, cost and pricing pressures were stated as the reason that the body hardware budget must be reduced, as opposed to allowing it to increase to accommodate 'real world' safety requirements." Thus, Sheridan expands his area of involvement and expertise to include budgeting and cost considerations.

Next, he makes specific references to the side sliding door latch and Chrysler's alleged knowledge that this latch was inadequate; "the safety importance of multiple latching mechanisms on doors such as the sliding door and the rear liftgate was discussed and communicated to upper management. However, because of the pricing and cost pressures already on the minivan, upper management insisted that no other latching features be added; rather, management insisted that the body hardware investment and piece costs be lowered still further."

His expanded knowledge also goes to testing. He is apparently ready to testify that the NS SLT "strongly recommended" that the NS be testing with offset impacts to evaluate structure. These recommendations were, according to Sheridan, rejected by the Production Direction Team.

Finally, Sheridan is now a statistician, apparently from his survey work, and a glass expert. He notes that he and other members of the door hardware work team "extensively" discussed the type of glass to be used in the side sliding door. The NS SLT believed the use of "shatter proof" glass should be further discussed and this recommendation was rejected by the Product Direction Team due to "cost." He also noted that Mr. Lutz made the decision that the glass would be fixed rather than a window that could be opened.

Sheridan further places knowledge within Chrysler in stating that he recalls "specific conversations and discussions with management at Chrysler during meetings when the fact was discussed that ejected occupants are statistically more likely to be killed or seriously injured in a collision if they were ejected from a vehicle, than if they remained in the vehicle."

I intend to spend considerable time with Sheridan going through his 20-page affidavit and its 58 exhibits to pin him down precisely to documents, persons, etc. This affidavit should be shown to other members of the Door Hardware Work Team and the NS SLT. In the past those employees never seemed to become incensed or outraged by Sheridan's statements. Perhaps this affidavit will help them in that regard.

This guy is not going away any time soon.

David

cc: Kenneth Gluckman  
Louann Van Der Wiele  
Michael Kidney  
Micki Singer  
Greg Ridella  
Bob Fulton

**Amendment I**

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.



# ATTACHMENT 4

11 May 2015

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

**Subject: Criminal Investigation of those Responsible for the Manslaughter of Ms. Kayla White**

Reference 1: My Letter to You of 23 April 2015 (Same Subject)

Reference 2: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

## One Page

Lee A. Iacocca Chairman's Award given to Paul V. Sheridan prior to the latter's appointment to chair the Safety Leadership Team (SLT).

IN RECOGNITION OF  
EXCELLENCE IN ACHIEVING



*“Your Personal Best”*

1985

Advance Product Planning Office  
to be the Best Goals

PAUL V. SHERIDAN

*L. A. Iacocca*

L. A. Iacocca

*E. A. Reickert*

E. A. Reickert

*Peter C. Badore*

P. C. Badore

*J. M. Hossack*

J. M. Hossack

*H. E. Cook*

H. E. Cook

*K. S. Mack*

K. S. Mack

# ATTACHMENT 5

11 May 2015

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

**Subject: Criminal Investigation of those Responsible for the Manslaughter of Ms. Kayla White**

Reference 1: My Letter to You of 23 April 2015 (Same Subject)

Reference 2: Conspiratorial Closure of NHTSA EA12-005: Jeep Fuel System Crashworthiness Defect

## Twenty-Three Pages

Preliminary analysis of DOT/NHTSA/FCA “remedy” as applied to the defective 2003 Jeep Liberty vehicle, and projected into the actual accident scene of 11 November 2014, that took the life of Ms. Kayla White and her unborn son Braedin.

Includes some of the comments posted to the obituary of Ms. White at the Hopcroft Funeral Home-Madison Heights website.

**Rear-Most Components are Painted Flat-Black. This Conceals Lack of Collision Protection to Rear-Mounted Plastic Fuel Tank**



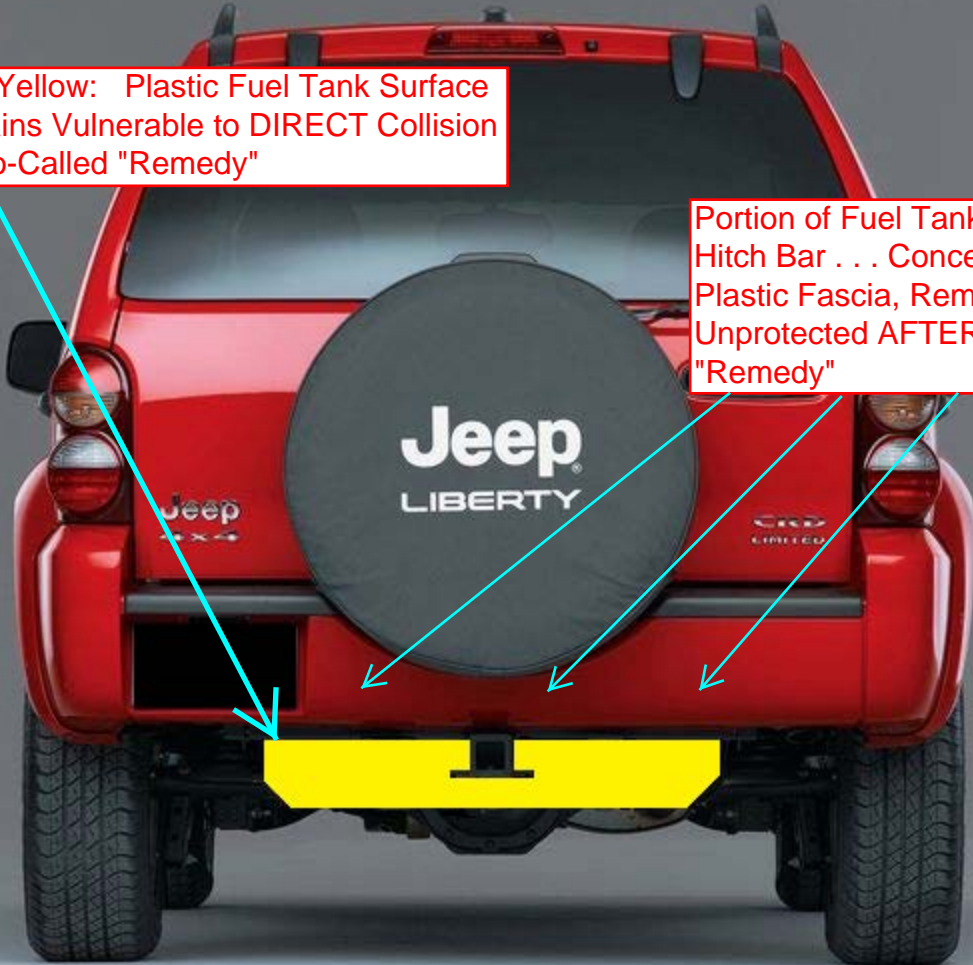
View of Jeep Liberty Plastic Fuel Tank. Decorative Non-Structural Fascia Removed

View of Jeep Liberty Plastic Fuel Tank. Decorative Non-Structural Fascia Removed, and Trailer Hitch Installed. Blue Portions Remain Unprotected



Shown in Yellow: Plastic Fuel Tank Surface that Remains Vulnerable to DIRECT Collision AFTER So-Called "Remedy"

Portion of Fuel Tank Above Hitch Bar . . . Concealed by Plastic Fascia, Remains Unprotected AFTER So-Called "Remedy"



D-Pillar

D-Pillar



Flimsy Fuel Tank  
Mounting Straps

Trailer Hitch  
Electrical Post:  
Mounted with  
Light Screws

Trailer Hitch Receiver

Flimsy Fuel Tank  
Mounting Straps





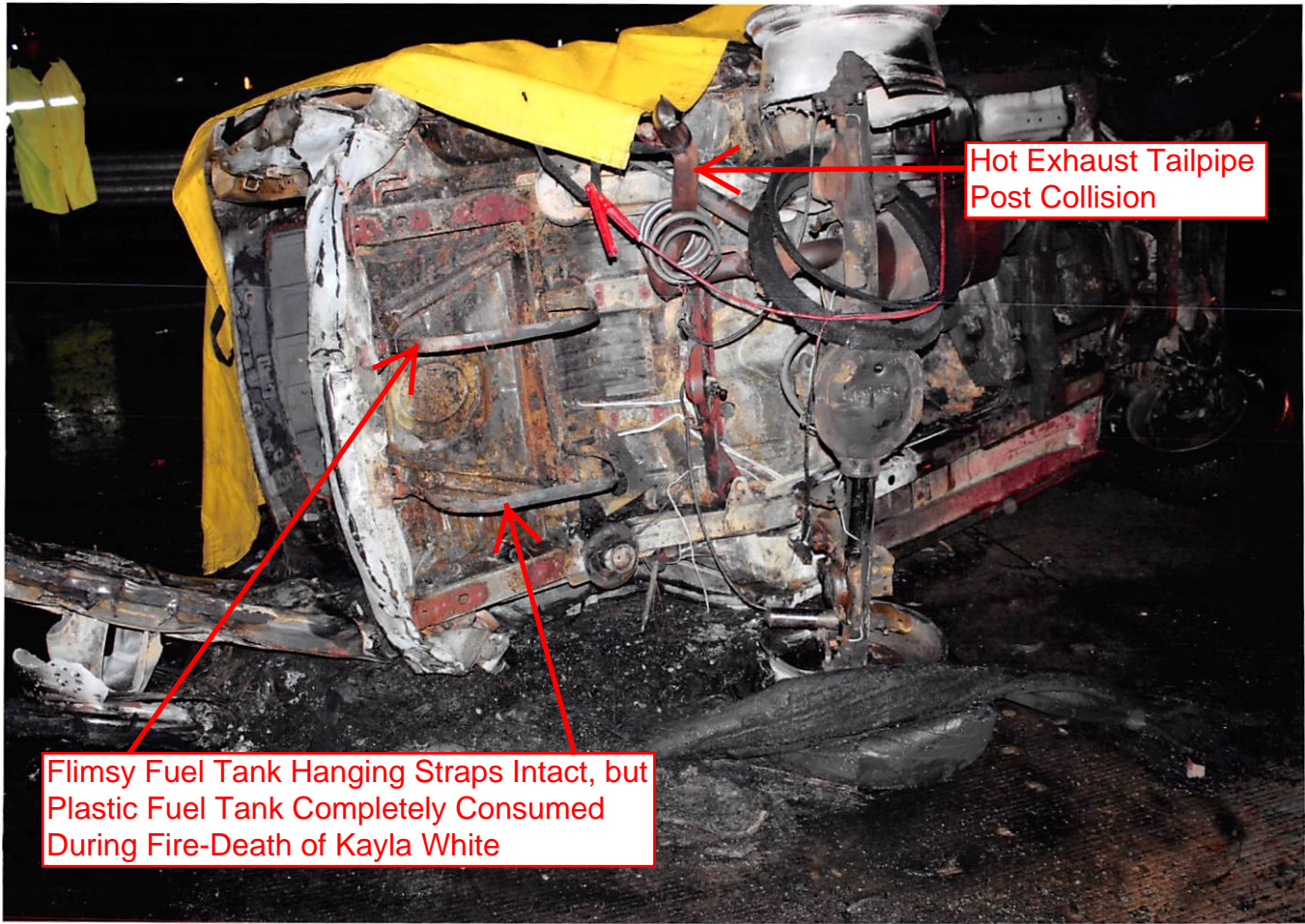
Trailer Hitch Electrical  
Post : Provides Electrical  
Spark **Ignition Source**  
During 'Brakes on' Collision  
or During 'Lights on' Normal  
Nighttime Running



Both D-Pillars, Rear Floor Pan, and Rear Bumper  
"Structure" of the Kayla White Jeep Liberty  
. . . Received NEAR-ZERO Impact Energy, and  
NEAR-ZERO Deformation



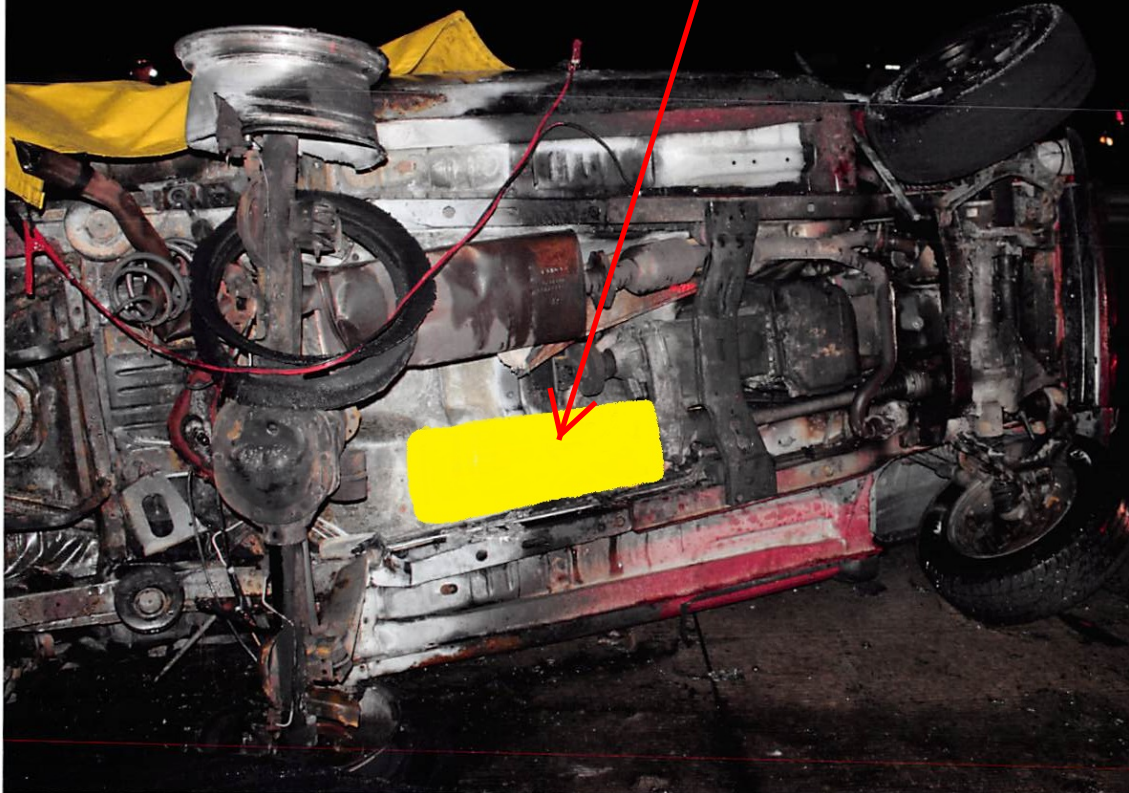
Demonstration that So-Called  
Jeep "Structure" is Irrelevant to  
Rear Underride Fire-Death Event



Hot Exhaust Tailpipe  
Post Collision

Flimsy Fuel Tank Hanging Straps Intact, but  
Plastic Fuel Tank Completely Consumed  
During Fire-Death of Kayla White

Approximate Shape and Location of  
N-Body and WK-Body Fuel Tank





Kayla Lucille White and her unborn son Braedin, burning to death on 11 November 2014, after fraudulent NHTSA/DOT/FCA recall of Jeep Liberty



## Kayla Lucille White

October 1, 1991 - November 11, 2014

Kayla Lucille White, age 23, of Ferndale, MI passed away November 11, 2014. She was born October 1, 1991 in Warren, MI to Robert and Susan White.

Kayla is survived by her loving boyfriend Cody Campbell. She was expecting her first son Braedin. Dear sister of Kory White. Granddaughter of Lucille Bolinger. She is also survived by many Aunts, Uncles and Cousins. She was a resident of Ferndale where she went through the Ferndale School System. Kayla worked at Andiamo's Restaurant in Bloomfield Hills, MI.

Memorial Visitation will be held Sunday, November 16, 2014 from 2:00 pm to 7:00 pm, the Memorial Services will be at 3:00 pm at Hopcroft Funeral Home, Madison Heights Chapel.

# Events

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**NOV** **Memorial Visitation** 02:00PM - 07:00PM

**16**

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Hopcroft Funeral Home-Madison Heights  
31145 John R. Road, Madison Heights, MI, US, 48071  
(248) 585-7770

**NOV** **Memorial Service** 03:00PM

**16**

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Hopcroft Funeral Home-Madison Heights  
31145 John R. Road, Madison Heights, MI, US, 48071  
(248) 585-7770

# Comments

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“ Kayla, I read the wonderful memories from so many people who were fortunate enough to have known you. Remembrances of you remind me so much of how my son Skyler is remembered. People only had good things ever to say about him. People say he made a positive difference in their lives. Also, like you, our Skyler died a horrific death, by fire, in a recalled Jeep, exactly 1 year and a day, before you succumbed to the same fate. How is it that, 1.5 years after a recall, and 1 year after we lost our amazing, precious Skyler, your family, friends and the world lost you, from something that was entirely preventable? Shame on anyone responsible for manufacturing defective vehicles, then delaying the notification to owners and recall of the vehicles. This loss never should have happened.

**Todd** - January 11 at 10:00 AM

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“ I give my deepest condolences during this difficult time. I was lucky to meet her at Harding Elementary and i will cherish all the memories i shared with her.



**Skyla** - December 22, 2014 at 05:53 PM

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“ Katie Tebbe lit a candle in memory of Kayla Lucille White



**katie tebbe** - November 21, 2014 at 08:59 PM

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“ So last year we went to the movies and saw no pain no gain or whatever it was called talked about all the hot guys and it was amazing time for me considering I was using. Kayla and Cody also came to my apartment for hazel park fireworks last year needless to say kayla has been one of my biggest cheerleaders. She never once lost



hope in me. Even while I was using tried getting me out of the house and then I got clean and she supported me every step of the way. Kayla you are truly a wonderful friend. And a wonderful person I will miss you so much. Forever you will be in my heart



paige - November 17, 2014 at 08:17 PM



“ She was a huge cheerleader. She was like us and just wanted what was best for you. She had a huge heart. I was talking to my brother about when she was in elementary school she had the biggest crush on him. Haha he said he remembered being in 3rd grade getting kindergarten buddies for school and he didn't remember who his was but he somehow met Kayla and every day after that day when she would see him in the hallway she would give him a hug. I remember her going through her hip surgeries in like 2nd grade and Mrs. White would bring her up to Harding Park on recess to spend time with the rest of the kids, when she relearned to walk from her surgery, everything. And she somehow always managed to be happy and smile. I don't have any memories of her ever being hurt or upset to be honest. She will be deeply deeply missed. She is still with all of us just in a new way.

**Katie Tebbe** - November 18, 2014 at 03:22 PM



“ Kayla and I have known each other since kindergarten. I have so many great memories of her. Her straightening my hair for the first time, staying the night at her house playing friends trivia. She really was an amazing young woman. I don't know a single person who has met her who didn't like her. She was someone everyone wanted to know or talk to. Her smile was contagious as heck. If you saw her smiling you would instantly smile for no reason at all.

I know we weren't as close as we use to when she passed but I hope her family finds peace in celebrating the wonderful life she did have and knowing the wonderful woman she was. She was taken from us all too soon. She would have been a wonderful mother and she's in heaven with Braedin looking down on everyone.

My heart goes out to her family, boyfriend, and best friend Jill. She'll always be remembered.



Katie Tebbe - November 17, 2014 at 01:37 PM

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“ My deepest sympathy for your family Kayla, you are such a beautiful young woman, the world was truly touched by you being in it, you always had a big smile whenever you walked into Borics. I only knew you from cutting your hair, but I knew you since you were a little girl and I'm glad I knew you..... I remember the last time you came in telling me about how excited you and your family were about your little boy, now you both are angels look down on your family and give them signs you are with them God rest your soul and your babies soul



Julie Crawford - November 16, 2014 at 11:28 PM

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“ Julie Crawford lit a candle in memory of Kayla Lucille White



Julie Crawford - November 16, 2014 at 11:16 PM

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“ 1 file added to the album New Album Name



Michelle Spivey - November 16, 2014 at 05:54 PM

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“ Michelle Spivey sent a gift in memory of Kayla Lucille White



Michelle Spivey - November 16, 2014 at 05:53 PM

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“ Michelle Spivey lit a candle in memory of Kayla Lucille White



Michelle Spivey - November 16, 2014 at 05:52 PM

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“ I Just Met Kayla a Month Ago, Not Many People Can Make Me Smile! When I Pulled Next To Kayla, And She Smiled At Me!

I Had To Smile Back, Such a BIG SMILE, FOR A SMALL LADY!!!!



Timothy J. Veltri - November 16, 2014 at 11:30 AM

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“ Mark Lozovoy lit a candle in memory of Kayla Lucille White



Mark Lozovoy - November 15, 2014 at 11:54 PM

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“ I did not know your daughter, but I have one and can only imagine the heartache you must be feeling. May GOD ease your pain in your time of need. May GOD bless you and keep you in the white light of his love.

jeri martin - November 15, 2014 at 07:41 PM

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“ Jeri Martin lit a candle in memory of Kayla Lucille White



jeri martin - November 15, 2014 at 07:38 PM

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“ When Kayla was little Kim and I would use her like our living baby doll dressing her up in cute outfits taking her shopping fly free

Elaine Suchy - November 15, 2014 at 12:36 PM

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“ My deepest sympathy, you and your family are in my prayers.  
Patricia Merritt

Patricia Merritt - November 15, 2014 at 12:32 PM

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“ I am so very sorry for your loss. I pray that God will ease your pain, as much as He can, during this difficult time in knowing that you will all be reunited again someday. May it ease your pain, even just a little, in remembering that they will both always be with you and watching over all of you.

Lisa Hoye - November 15, 2014 at 11:42 AM

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“ Beautiful in Blue was purchased for the family of Kayla Lucille White.



November 15, 2014 at 10:11 AM

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“ Our little angel, Kayla... I was blessed to know your gentle spirit while working at Northern Lakes. May your family take comfort in knowing you're sitting along St. Peter, welcoming each new comer with a bright smile and showing them their place in heaven...

**Barb Brodbeck** - November 15, 2014 at 06:35 AM

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“ She always had a kind word or even a beautiful smile to share with others. I will never forget how excited Susan and Russ were the day she was born. We love y'all



**Rebecca Brown** - November 14, 2014 at 10:33 PM

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“ She always had a kind word or even a beautiful smile to share with others. I will never forget how excited Susan and Russ were the day she was born. We love y'all



**Rebecca Brown** - November 14, 2014 at 10:33 PM

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“ Tom and Alicia Jones purchased the Arrive in Style for the family of Kayla Lucille White.



Tom and Alicia Jones - November 14, 2014 at 06:10 PM

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“ Thinking of you during this very difficult time...



Kathie and Jeff Riley - November 14, 2014 at 05:14 PM

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“ Working at northern lakes together and you were always so funny and happy. Talking to you at the time about jillian was always so entertaining. Always good story's and good times. You were a good person. A very beautiful girl. Rip.

Stephen Dolich - November 14, 2014 at 05:02 PM

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“ Linz Reyntens lit a candle in memory of Kayla Lucille White

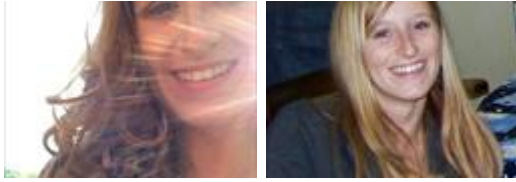


Linz Reyntens - November 14, 2014 at 03:06 PM

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“ 2 files added to the album New Album Name



John Bolinger (uncle) - November 14, 2014 at 01:01 PM

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“ Kayla worked at the Ferndale Dairy Queen while she was growing up and attending Ferndale High School. I was her manager and had the pleasure of working with her for three years. She was an amazing girl and I loved all the laughs we had together. She will always have a special place in our hearts <3

Nicole Trewogy - November 14, 2014 at 12:45 PM

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“ Beautiful Dreams was purchased for the family of Kayla Lucille White.



November 14, 2014 at 12:39 PM

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“ Florina purchased the Garden Accent- Gone yet not forgotten... for the family of Kayla Lucille White.



Florina - November 14, 2014 at 10:42 AM

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“ you are in our hearts and prayers. oooooo Debbie polack friend



debbie polack - November 14, 2014 at 10:24 AM

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“ Garden Accent- Gone yet not forgotten... was purchased for the family of Kayla Lucille White.



November 14, 2014 at 10:02 AM

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“ Liz Browder purchased the Secret Garden Basket for the family of Kayla Lucille White.



Liz Browder - November 14, 2014 at 09:52 AM

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“ I am so very sorry for your loss, my prayers are with you all... rest in paradise young \*angels\*

Amy Smith - November 14, 2014 at 09:30 AM

---





“ Denise Huren, Shauna Frankowski, Jennifer Griffiths purchased the Sweet Tenderness for the family of Kayla Lucille White.



**Denise Huren, Shauna Frankowski, Jennifer Griffiths** - November 14, 2014 at 08:42 AM

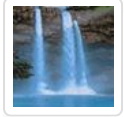
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“ I did not know Kayla, (but heard about her on the news and from the Ferndale High School Alumni group on facebook, she was 8 years younger than I). I'm so very sorry for your loss, she was far far too young, and had purpose to live longer, to become a mother. I cannot imagine the great loss that you are suffering, you are in my prayers, and you have my deepest sympathies. God Bless, and Kayla is now an angel among us, and will always be with you.

**Sarah Tamm** - November 14, 2014 at 07:44 AM

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“ Dear Kayla, I have never met you or Cody, but I know Cody's mom, your so young and beautiful, I know you will make a beautiful angel in heaven, and your baby will be a very special angel in heaven for all babies,



**Bonnie Phillips** - November 14, 2014 at 07:35 AM

---



“ Im so sorry for your loss she was a beautiful woman. May her and her precious baby boy be reunited with our lord and savior.

**hannah** - November 14, 2014 at 04:55 AM

---



“ I'm so sorry to hear about Kayla! Thoughts and prayers to you all!!

**Rebecca Vanderveer** - November 13, 2014 at 10:17 PM



“ I will always remember the laughter, the smiles, the constant joy being around Kayla as a young girl. She was beautiful caring daughter and loving friend. Our hearts are full knowing her, saddened at the loss and forever changed.

Carey (Bitel) Majewski



Carey Majewski - November 13, 2014 at 07:01 PM

# END OF DOCUMENT

11 May 2015

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

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