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9
10 **UNITED STATES DISTRICT COURT**
FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 **SAN FRANCISCO DIVISION**

12 GERI BARRIENTOS and MICHAEL
13 FOERST, individually and on behalf of all
others similarly situated,

14 Plaintiffs,

15 v.

16 TOYOTA MOTOR SALES, U.S.A., INC.,
17 TOYOTA MOTOR CORPORATION, and
TOYOTA MOTOR NORTH AMERICA,
INC.,

18 Defendants.

Case No.: 3:24-cv-03282

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

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20
21
22 Plaintiffs Geri Barrientos and Michael Foerst, individually and on behalf of all others
23 similarly situated, bring this action against Defendants Toyota Motor Sales, U.S.A., Inc.,
24 Toyota Motor Corporation, and Toyota Motor North America, Inc. (“Defendants” or
25 “Toyota”), by and through their attorneys, and allege as follows based on (a) personal
26 knowledge, (b) the investigation of counsel, and (c) information and belief.

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I. INTRODUCTION

1
2 1. This consumer class action arises from a latent defect found in model years
3 (“MY”) 2019-2023 Toyota RAV4 and MY 2019-2023 Toyota Corolla vehicles (hereafter, the
4 “Class Vehicles”).¹

5 2. This action arises from Defendants’ failure, despite their longstanding
6 knowledge, to disclose to Plaintiffs and Class Members that the Class Vehicles contain
7 defectively designed and/or manufactured coolant bypass valves (“the Defect”) that
8 prematurely fail. When the Defect manifests, coolant leaks out of the closed-loop coolant
9 system. This adversely impacts the ability of the coolant system to properly regulate the
10 temperature of the engine, and can lead to engine overheating, stalling, increased emissions
11 and catastrophic engine failure. In addition, the leaking coolant can leak into the surrounding
12 engine components, including the electrical system, and damage those components. The
13 leaking coolant can also corrode the sensor on the coolant bypass valve, which causes it to
14 remain stuck in the “open” or “closed” position and thus impedes its ability to properly direct
15 coolant throughout the engine, thereby impeding the ability of the engine to operate within the
16 appropriate parameters.

17 3. Defendants actively concealed material facts regarding the Defect from
18 Plaintiffs and Class Members, including (i) that the Class Vehicles were prone to the Defect
19 and require costly repairs to fix; (ii) that Class Vehicles are subject to repeat failures of the
20 coolant bypass valves because the purported repairs do not actually fix the Defect; and (iii)
21 that the existence of the Defect would diminish the intrinsic and resale value of the Class
22 Vehicles.

23 4. At all relevant times, Defendants knew, or through the exercise of reasonable
24 care had reason to know, that the coolant bypass valves in the Class Vehicles were defective
25 and that the existence of this Defect would materially affect Plaintiffs and the Class’s (defined
26 below) decision to purchase the Class Vehicles.

27
28 ¹ Plaintiffs reserve the right to amend the definition of the Class Vehicles after conducting discovery.

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1 5. Defendants have long been aware of the Defect. Despite their longstanding
2 knowledge, Defendants have been unable or unwilling to adequately repair the Class Vehicles
3 at no cost to Plaintiffs and the Class when the Defect manifests.

4 6. Defendants omitted and/or concealed the existence of the Defect to increase
5 profits by selling additional Class Vehicles. Knowledge and information regarding the Defect
6 were in the exclusive and superior possession of Defendants and its dealers, and this
7 information was not disclosed to Plaintiffs and members of the Class at the time of purchase,
8 or otherwise.

9 7. Based on pre-production testing, pre-sale durability testing, failure mode
10 analyses, bench testing, warranty and post-warranty claims, consumer complaints on forums
11 monitored by Defendants, consumer complaints submitted to the federal government, and
12 consumer complaints made to and by dealers and directly to Defendants, Defendants were
13 aware of the Defect and omitted the existence of and/or fraudulently concealed the Defect from
14 Plaintiffs and members of the Class.

15 8. Defendants have also refused to take any action to correct this concealed Defect
16 when it manifests in the Class Vehicles outside of the warranty period. Because the Defect can
17 manifest shortly outside of the warranty period for the Class Vehicles—and given Defendants’
18 knowledge of the Defect—Defendants’ attempt to limit the warranty is unconscionable and
19 unenforceable.

20 9. As a result of Defendants’ unfair, deceptive, and/or fraudulent business
21 practices, owners and lessees of the Class Vehicles, including Plaintiffs, have suffered an
22 ascertainable loss of money and/or property and/or loss in value. The unfair and deceptive
23 trade practices committed by Defendants were conducted in a manner giving rise to substantial
24 aggravating circumstances.

25 10. Had Plaintiffs and other Class Members known of the Defect at the time of
26 purchase or lease, they would not have bought or leased their Class Vehicles, or would have
27 paid substantially less for them.

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1 11. This case seeks protection and relief for owners and lessees of the Class Vehicles
2 for the harm they have suffered, and seeks redress for Defendants’ breaches of express and
3 implied warranties, Defendants’ unfair, unlawful, and deceptive trade practices, and for
4 common law fraudulent concealment and unjust enrichment.

5 **II. JURISDICTION AND VENUE**

6 12. This Court has subject matter jurisdiction of this action pursuant to 28 U.S.C. §
7 1332 of the Class Action Fairness Act of 2005 because: (i) there are 100 or more class
8 members, (ii) there is an aggregate amount in controversy exceeding \$5,000,000, exclusive of
9 interest and costs, and (iii) there is minimal diversity because at least one plaintiff and one
10 defendant are citizens of different States. This court has supplemental jurisdiction over the
11 state law claims pursuant to 28 U.S.C. § 1367 and jurisdiction over the Magnuson-Moss
12 Warranty Act claim by virtue of diversity jurisdiction being exercised under the Class Action
13 Fairness Act (“CAFA”).

14 13. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391 because
15 Defendants transact business in this district, are subject to personal jurisdiction in this district,
16 and therefore are deemed to be citizens of this district. Additionally, a substantial part of the
17 events or omissions giving rise to the claim occurred in this district, as Defendants have
18 advertised in this district and have received substantial revenue and profits from its sales and/or
19 leasing of Class Vehicles in this district. Toyota Motor North America, Inc. also maintains its
20 Product Quality Field Office in San Francisco, California, which provides “a direct link between
21 the customer and Toyota’s design, quality, and manufacturing organizations” and “enable[s]
22 Toyota to respond to customer issues quickly and effectively. The field office focuses its
23 research on heating, ventilation, air conditioning, and vehicle drivability.”²

24 14. This Court has personal jurisdiction over Defendants because they have
25 conducted substantial business in this judicial district, and intentionally and purposefully
26 placed Class Vehicles into the stream of commerce within the states of California and Florida,
27

28 ² <https://www.toyota.com/usa/operations/map/usca> (last visited May 31, 2024).

1 and throughout the United States. Defendant Toyota Motor North America, Inc. is also
2 incorporated in the state of California.

3 **III. PARTIES**

4 **A. Plaintiffs**

5 **Plaintiff Geri Barrientos**

6 15. Plaintiff Geri Barrientos is a citizen of California, and currently resides in Bell
7 Gardens, California, and has at all times pertinent to this Complaint.

8 16. Plaintiff Barrientos purchased a 2020 Toyota RAV4 in June 2020 from Tustin
9 Toyota, an authorized Toyota dealership located in Tustin, California.

10 17. Plaintiff Barrientos purchased (and still owns) this vehicle, which is used for
11 personal, and/or household use. Her vehicle bears Vehicle Identification Number:
12 2T3W1RFV2LW083428.

13 18. In the months preceding her purchase, Plaintiff Barrientos researched and
14 viewed earlier model Toyota RAV4s as well as Toyota's advertisements online and on
15 television. Based on those advertisements, she understood that the 2020 Toyota RAV4 would
16 include various upgrades from their previous designs. In May 2020, Plaintiff Barrientos called
17 Tustin Toyota to place an order for the 2020 Toyota RAV4. She discussed the features of the
18 2020 Toyota RAV4 with Toyota's sales representatives. She also reviewed the window sticker.
19 None of these sources disclosed the Defect to Plaintiff Barrientos. Had these sources disclosed
20 the Defect, she would have seen the disclosure and it would have materially impacted her
21 decision to purchase her Class Vehicle.

22 19. On or around March 2024, when Plaintiff Barrientos' vehicle had approximately
23 40,723 miles on the odometer, a dashboard alert appeared stating "Engine Maintenance
24 Required: Visit Your Dealer." Plaintiff Barrientos thought she received the alert because she
25 was due for an oil change, so she brought her vehicle to a local mechanic to obtain an oil
26 change. The dashboard alert did not go away after obtaining an oil change. She began
27 researching the alert online and discovered that the alert related to the Defect and posted about
28 frequently online by others who experienced the Defect.

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1 20. Plaintiff Barrientos contacted Penske Toyota, an authorized Toyota dealership
2 located in Downey, California, to report the issue with the dashboard alert. Penske Toyota
3 informed Plaintiff Barrientos that she would be required to pay \$200 just to diagnose the
4 vehicle, and that the repairs would not be covered under warranty.

5 21. Because Penske Toyota would not provide the necessary repairs under warranty,
6 Plaintiff Barrientos brought her vehicle to a local mechanic who diagnosed a coolant bypass
7 valve failure.

8 22. Plaintiff Barrientos needed a safe and working vehicle, so she paid for the
9 necessary repairs in the amount of \$300.

10 23. Neither Defendant, nor any of its agents, dealers, or other representatives
11 informed Plaintiff Barrientos of the existence of the Defect prior to, or any time after, her
12 purchase. Had Defendants informed Plaintiff Barrientos of the existence of the Defect,
13 Plaintiff Barrientos would not have purchased her vehicle or would have paid substantially
14 less for it.

15 24. Plaintiff Barrientos has suffered an ascertainable loss as a result of Defendants'
16 omissions and/or misrepresentations associated with the Coolant Bypass Valve Defect,
17 including, but not limited to, out-of-pocket losses associated with the Coolant Bypass Valve
18 Defect, diminished value of her vehicle, and other consequential damages.

19 **Plaintiff Michael Foerst**

20 25. Plaintiff Michael Foerst is a citizen of Florida, and currently resides in Palm
21 Harbor, Florida, and has at all times pertinent to this Complaint.

22 26. Plaintiff Foerst purchased a 2020 Toyota RAV4 in January 2020 from Sun
23 Toyota, an authorized Toyota dealership located in Holiday, Florida.

24 27. Plaintiff Foerst purchased (and still owns) this vehicle, which is used for
25 personal and/or household use. His vehicle bears Vehicle Identification Number:
26 2T3W1RFV0LC049327.

27 28. Prior to purchase, Plaintiff Foerst test drove various Toyota RAV4 vehicles at
28 several local authorized Toyota dealerships, reviewed the window sticker, and discussed the

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1 features of the Toyota RAV4 vehicles with Toyota’s sales representatives. Specifically,
2 Plaintiff Foerst discussed the warranty with Toyota’s sales representatives, including what
3 repairs were covered and the length of coverage. None of these sources disclosed the Defect
4 to Plaintiff Foerst. Had these sources disclosed the Defect, he would have seen the disclosure
5 and it would have materially impacted his decision to purchase his Class Vehicle.

6 29. On or around April 28, 2024, when Plaintiff Foerst’s vehicle had approximately
7 41,130 miles on the odometer, a dashboard alert appeared stating “Engine Maintenance
8 Required: See Dealer.” Plaintiff Foerst contacted Sun Toyota and scheduled an appointment
9 to address the issue.

10 30. On April 30, 2024, Plaintiff Foerst brought his vehicle to Sun Toyota. Sun
11 Toyota informed Plaintiff that the coolant bypass valve failed. Sun Toyota informed Plaintiff
12 Foerst that he would be required to pay for the necessary repairs as they were not covered
13 under the warranty.

14 31. Plaintiff Foerst needed a safe and working vehicle, so he paid for the necessary
15 repairs in the amount of \$700.

16 32. Neither Defendant, nor any of its agents, dealers, or other representatives
17 informed Plaintiff Foerst of the existence of the Defect prior to, or any time after, his purchase.
18 Had Defendants informed Plaintiff Foerst of the existence of the Defect, Plaintiff Foerst would
19 not have purchased his vehicle or would have paid substantially less for it.

20 33. Plaintiff Foerst has suffered an ascertainable loss as a result of Defendants’
21 omissions and/or misrepresentations associated with the Coolant Bypass Valve Defect,
22 including, but not limited to, out-of-pocket losses associated with the Coolant Bypass Valve
23 Defect, diminished value of his vehicle, and other consequential damages.

24 **B. Defendants**

25 34. Defendants are automobile design, manufacturing, distribution, and/or service
26 corporations doing business within the United States, and they design, develop, manufacture,
27 distribute, market, sell, lease, warrant, service, and repair passenger vehicles, including the
28 Class Vehicles.

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1 35. Defendants Toyota Motor Sales, U.S.A., Inc. and Toyota Motor North America,
2 Inc., are incorporated in California with their principal place of business at 6565 Headquarters
3 Drive, Plano, TX 75024.

4 36. Defendant Toyota Motor Corporation (“TMC”) is a Japanese corporation, and
5 the corporate parent of Toyota Motor North America, Inc. TMC, through its various
6 subsidiaries and affiliates, designs, manufactures, markets, and distributes Toyota automobiles
7 across the United States.

8 37. Defendant Toyota Motor North America, Inc. (“TMNA”) is a California
9 corporation headquartered in Plano, Texas as of May 2017. TMNA operates as a wholly owned
10 subsidiary of Toyota Motor Corporation (“TMC”), the Japanese parent company, and is the
11 corporate parent of Toyota Motor Sales, U.S.A., Inc. (“TMS”). TMNA oversees government
12 and regulatory affairs, energy, economic research, philanthropy, corporate advertising and
13 corporate communications for all of TMC’s North American operations.

14 38. TMS is a California corporation headquartered in Plano, Texas. TMS is the U.S.
15 sales and marketing division for TMC and TMNA, and oversees sales and other operations
16 across the United States. TMS distributes Toyota parts and vehicles, which are then sold
17 through Defendants’ network of dealers. Money received from the purchase of a Toyota
18 vehicle from a dealership flows from the dealer to TMS.

19 39. There exists, and at all times herein mentioned existed, a unity of ownership
20 between TMC, TMNA, and TMS and their agents such that any individuality or separateness
21 between them has ceased and each of them is the alter ego of the others. Adherence to the
22 fiction of the separate existence of Defendants, would, under the circumstances set forth in
23 this complaint, sanction fraud and/or promote injustice.

24 40. Upon information and belief, Defendants TMNA and TMS communicate with
25 TMC concerning virtually all aspects of the Toyota products TMNA and TMS distribute within
26 the United States, including appropriate repairs for pervasive defects, and whether Toyota will
27 cover repairs to parts customers claim to be defective. Toyota’s decision not to disclose the
28 Defect to Plaintiffs or the Class, or whether to cover repairs to the same pursuant to an extended

1 warranty or goodwill program, was a decision made jointly by TMC, TMNA, and TMS.

2 41. TMS also oversees Toyota's National Warranty Operations (NWO), which,
3 among other things, reviews and analyzes warranty data submitted by Toyota's dealerships
4 and authorized technicians in order to identify defect trends in vehicles. Upon information and
5 belief, TMS dictates that when a repair is made under warranty (or warranty coverage is
6 requested), authorized dealerships must provide Defendants with detailed documentation of
7 the problem and the fix that describes the complaint, cause, and correction, and also retain the
8 broken part in the event Defendants audit the dealership. NWO collects this information,
9 makes it available to other Toyota divisions, and assists Toyota in determining whether
10 particular repairs—such as those made to Plaintiffs and the Class's coolant bypass valves—
11 are covered by an applicable Toyota warranty or are indicative of a pervasive defect.

12 42. Toyota also jointly designs, determines the substance of, and affixes to its
13 vehicles the window stickers visible on every new Toyota vehicle offered for sale at its
14 authorized dealerships, including those omitting mention of the Defect and reviewed by
15 Plaintiffs and the Class prior to purchasing Class Vehicles. Toyota controls the content of these
16 window stickers; its authorized dealerships have no input with respect to their content. Vehicle
17 manufacturers like Toyota are legally required to affix a window sticker to every vehicle
18 offered for sale in the United States pursuant to the Automobile Information Disclosure Act of
19 1958, 15 U.S.C. §§ 1231-1233, *et seq.* The Act specifically prohibits the removal or alteration
20 of the sticker by anyone other than the ultimate purchaser prior to the sale of the car, including
21 the dealership at which the vehicle is offered for sale.

22 43. Toyota developed the marketing materials to which Plaintiffs and the Class were
23 exposed, including owner's manuals, informational brochures, warranty booklets and
24 information included in maintenance recommendations and/or schedules for the Class
25 Vehicles, all of which fail to disclose the Defect.

26 44. Toyota also employs a Customer Experience Center, known as Toyota Brand
27 Engagement Center, the representatives of which are responsible for fielding customer
28 complaints and monitoring customer complaints posted to Toyota or third-party web sites: data

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1 which informs NWO’s operations, and through which Toyota acquires knowledge of defect
2 trends in its vehicles.

3 **IV. TOLLING OF STATUTES OF LIMITATIONS**

4 45. Any applicable statute(s) of limitations have been tolled by Defendants’
5 knowing and active concealment and denial of the facts alleged herein. Plaintiffs and members
6 of the Class could not have reasonably discovered the true, latent nature of the Defect until
7 shortly before this class action litigation was commenced.

8 46. In addition, even after Plaintiffs and Class members contacted Toyota and/or its
9 authorized dealers regarding the Defect, they were routinely informed that the Class Vehicles
10 were not defective.

11 47. Defendants were and remain under a continuing duty to disclose to Plaintiffs and
12 members of the Class the true character, quality, and nature of Class Vehicles, that the Defect
13 is the result of poor manufacturing processes, workmanship and/or design, that it will require
14 costly repairs, and that it diminishes the resale value of the Class Vehicles. As a result of
15 Defendants’ active concealment, any and all statutes of limitations otherwise applicable to the
16 allegations herein have been tolled.

17 **V. FACTUAL ALLEGATIONS**

18 48. Toyota is the world’s second-largest automotive manufacturer and sells its
19 vehicles across the United States through a network of nearly 1,500 dealers, including in
20 California.

21 49. Toyota brands itself as the maker of functional, reliable, and safe vehicles and
22 spends millions of dollars on extensive marketing and advertising campaigns to convey that
23 brand to consumers.³

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27 ³ <https://www.toyota.com/usa/our-story/> (last visited May 31, 2024);
28 <https://www.statista.com/statistics/261539/toyotas-advertising-spending-in-the-us/#:~:text=In%202022%2C%20Japanese%20car%20manufacturer,in%20the%20U.S.%20that%20year> (last visited May 31, 2024).

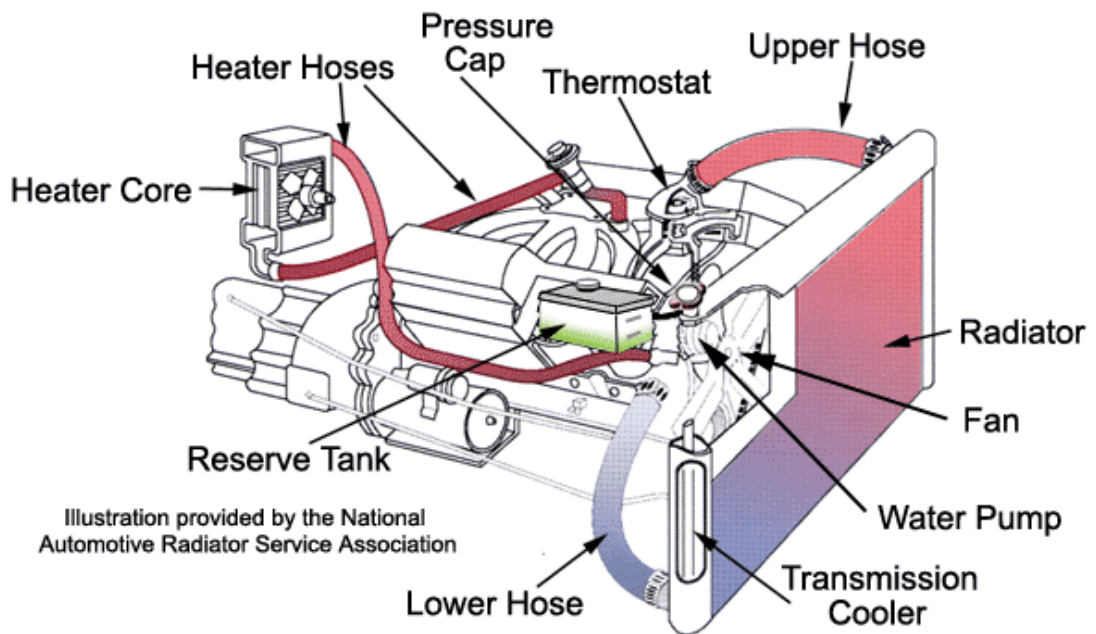
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A. The Coolant Bypass Valve in the Class Vehicles

50. All modern-day automobiles with internal combustion engines utilize a liquid coolant system in order to regulate the temperature of the engine.

51. As the engine starts and begins to run, the engine generates heat. As the heat builds in the engine, the thermostat within the cooling system then begins to open. Once the thermostat has opened, the water pump starts by taking coolant from the radiator and moving it through the engine block and associated components. As the coolant flows through the engine coolant passages, it absorbs heat from the engine, thereby allowing the engine to operate at its optimal temperature and avoid overheating. The coolant then returns back to the radiator, where it is cooled and then can be cycled through the Class Vehicle’s engine again.

A diagram depicting the general flow of engine coolant is included below:



52. The coolant system in the Class Vehicles is a “closed loop” system, which means that the coolant flows throughout the system and is not appreciably consumed in the process. In other words, the coolant levels will only appreciably reduce if the system develops a leak. Once a leak develops, the coolant level will steadily reduce until the source of the leak is identified and repaired and the coolant levels are refilled.

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1 53. The Class Vehicles incorporate a coolant bypass valve, which helps to direct the
2 flow of coolant through the engine. When the engine is warming up, the coolant bypass valve
3 directs the flow of coolant to circulate throughout the engine block instead of cycling back to
4 the radiator, which helps the engine to reach its optimal operating temperature. This is
5 important for achieving optimal gas mileage and emissions output.

6 54. Ensuring the engines reach optimal operating temperature quickly has a direct
7 impact on the emissions produced by the Class Vehicles. An engine operating at its optimal
8 temperature will be more efficient and produce fewer emissions compared to a colder engine.
9 As such, reducing the time it takes for the Class Vehicle to warm up is essential for the Class
10 Vehicles to reach their advertised emission targets.

11 55. Engine efficiency is also impacted by coolant flow and optimal operating
12 temperatures. A cold engine will combust less fuel, leading to reduced fuel efficiency. An
13 engine at its optimal operating temperature will conversely combust fuel more completely and
14 efficiency, resulting in improved fuel efficiency. Thus, ensuring the engine reaches its optimal
15 operating temperature is also essential for the Class Vehicles to reach their fuel efficiency (i.e.
16 miles-per-gallon) targets.

17 56. After the engine reaches its optimal operating temperature, the coolant bypass
18 valve allows more coolant to flow through the radiator in order to maintain the optimal engine
19 temperature, or to the passenger cabin to provide additional heating.

20 57. If the coolant bypass valve is not functioning properly, it will not be able to direct
21 engine coolant to the parts of the engine that need it the most. If the engine starts to overheat,
22 the coolant bypass valve will direct more coolant to the radiator to ensure the engine does not
23 overheat. If the engine overheats, it can cause excessive wear to the engine components and
24 lead to catastrophic engine failure.

25 58. Upon information and belief, the Class Vehicles used substantially similar, if not
26 identical, coolant bypass valves, as evidenced by the common coolant bypass valve part
27 number 16671-F2020 used in both models of the Class Vehicles.

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1 **B. The Coolant Bypass Valve Defect**

2 59. The coolant bypass valves within the Class Vehicles suffer from a design and/or
3 manufacturing Defect that ultimately results in the coolant bypass valves failing to perform as
4 intended.

5 60. Upon information and belief, the source of the Defect is an insufficiently
6 manufactured and/or designed coolant bypass valve that cracks and leaks coolant. Once
7 coolant beings leaking, it comes into contact with the electrical connector located near the
8 valve. The coolant corrodes and damages the connector, which eventually causes connector to
9 malfunction. This causes the coolant bypass valve to be stuck in the “open” or “closed”
10 position (i.e. it no longer responds to the needs of the engine), restricting coolant flow and
11 allowing the engine to overheat.

12 61. As a result of the coolant leak and damage to the electrical connector, the engine
13 can no longer communicate with the coolant bypass valve while the vehicle is being operated.
14 Thus, the coolant bypass valve cannot redirect engine coolant to the radiator to help cool the
15 engine during operation, which can cause the engine to overheat and damage the engine
16 components.

17 62. In addition, and as described above, the coolant system in the Class Vehicles is
18 a closed-loop system. The refrigerant in the cooling system should not be appreciably reduced
19 unless the system develops a leak. If a leak develops, the refrigerant will exit the closed-loop
20 and eventually deactivate the system entirely because without refrigerant, it cannot operate as
21 intended.

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1 63. When the Defect manifests, it also causes a message to appear on the dashboard
2 over the speedometer, which states: “Engine Maintenance Required” and “Visit Your Dealer.”
3 The message cannot be dismissed or otherwise removed from the dash of the Class Vehicle by
4 the operator of the Class vehicle, and instead must be brought to a dealership or to a mechanic.
5 The message is distracting and obscures a significant portion of the speedometer. An image
6 depicting the message is included below:



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12 64. Consumers have also reported that the “Engine Maintenance Requirement”
13 message blocks other important, safety-related messages that are intended to display in the
14 same area of the dash occupied by the message.
15

16
17 65. When the engine overheats because of the Defect, it can cause the Class Vehicles
18 to stall and strand the operator of the Class Vehicle, leaving him or her stuck in a potentially
19 unsafe location and require them to call (and pay) for a tow to the nearest dealership or
20 mechanic to diagnose the Defect.
21

22 66. Had Toyota disclosed the existence of the Defect, Plaintiffs and the Class would
23 not have purchased their Class Vehicles, or would have paid substantially less for them.
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1 **C. Toyota’s Knowledge of the Defect**

2 67. Upon information and belief, Defendants regularly monitor the NHTSA
3 databases as part of their ongoing obligation to identify potential defects in their vehicles.
4 Examples of the complaints about Class Vehicles can be found below. The below sources
5 establish that Defendants knew, or should have known, of the Defect based on publicly
6 available information through (1) Defendants’ own records of customers’ complaints, (2)
7 dealership repair records, (3) records from NHTSA, (4) warranty and post-warranty claims,
8 (5) pre-sale durability testing and part sales, and (6) other various sources.

9 **1. Defendants’ Pre-Sale Testing and Quality Control Measures**

10 68. Defendants perform rigorous product testing prior to releasing their vehicles to
11 confirm, among other things, the vehicle’s compliance with specification representations and
12 marketing materials they intend to provide to the public, as well as compliance with state and
13 federal regulations.

14 69. Defendants emphasize “total quality management” throughout the entire
15 manufacturing process. Toyota further claims that it uses the “highest quality materials” and
16 ensures that every vehicle meets “rigorous standards before it reaches the market”.⁴

17 70. Defendants attribute their purported success to their testing methods and
18 criteria.⁵ Toyota states that it conducts comprehensive and extensive testing and validation
19 processes.⁶ In 2016 alone, Toyota invested over \$1.2 billion in engineering design and
20 development and manufacturing.⁷ Upon information and belief, Toyota’s product testing
21 include testing of the coolant system and coolant bypass valve in the Class Vehicles.

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25 ⁴ <https://www.longotoyota.com/blogs/4337/what-makes-toyotas-so-reliable/> (last visited May 31,
2024).

26 ⁵ <https://www.maplewoodtoyota.com/research/new-car-testing.htm#:~:text=Toyota%20randomly%20selects%20completed%20engines,%2C%20pistons%2C%20valves%20and%20camshafts> (last visited May 31, 2024).

27 ⁶ <https://www.longotoyota.com/blogs/4337/what-makes-toyotas-so-reliable/> (last visited May 31,
2024).

28 ⁷ <https://pressroom.toyota.com/toyota-us-operations-2016-brochure/> (last visited May 31, 2024).

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1 71. Through their quality control measures, Defendants knew or should have known
2 of the Defect described herein, yet have and continue to omit information surrounding the
3 Defect to the Class.

4 **2. Toyota’s T-TT-0699-22**

5 72. On July 8, 2022, Toyota issued Tech Tip T-TT-0699-22, titled “Engine
6 Maintenance Required Message – Scan for DTCs.” *See* Exhibit 1.

7 73. The Tech Tip was issued for the “Engine/Hybrid System” and specifically relates
8 to “Cooling” in the Class Vehicles, as well as additional Toyota vehicles.

9 74. The Tech Tip observes that the Class Vehicles “may display the following
10 message ‘Engine Maintenance Required Visit Your Dealer’ on the combination meter.” In
11 instructs the dealer to check for “DTCs” which refers to diagnostic trouble codes.

12 75. If the dealership identifies a DTC, it instructs them to “Proceed with the repair
13 recommended in the repair manual for the DTC.” The Tech Tip does not alter the existing
14 warranties or provide for free repairs for the Defect.

15 76. The Tech Tip is a document only issued to authorized Toyota dealerships and is
16 not provided directly to consumers, including owners and lessees of the Class Vehicles.

17 77. Upon information and belief, Tech Tips are issued only after a significant
18 number of customer complaints or dealership complaints are received by Toyota. In response,
19 Toyota creates a document that it disseminates directly to its authorized dealership in order to
20 provide them with guidance on how to diagnose and remedy common complaints. Given that
21 the Class Vehicles were first available for purchase in late 2018 and the Tech Tip was issued
22 in July of 2022, Toyota likely received scores of complaints from dealers and consumers alike
23 regarding the Defect, and it issued the Tech Tip as a result.

24 **3. Complaints by Other Class Members**

25 78. Plaintiffs’ experiences are by no means isolated or outlying occurrences.

26 79. All vehicle manufacturers, including Defendants, are legally obligated to
27 routinely monitor and analyze NHTSA complaints in order to determine whether vehicles or
28 automotive components should be recalled due to safety concerns, and Defendants thus have

1 knowledge of any and all NHTSA complaints. See TREAD Act, Pub. L. No. 106-414, 114
2 Stat. 1800 (2000).

3 80. The following is just a small sampling of the many complaints submitted to
4 NHTSA by Class Vehicle owners. These publicly available complaints evidence Defendants'
5 knowledge of the Defect, the negative experiences encountered by Class Members, and the
6 financial burden this places on them:⁸

7 **RAV 4 Complaints**

8 **NHTSA ID Number:** 11470772

9 **Incident Date** May 27, 2022

10 **Complaint Date** June 23, 2022

11 **Vehicle Identification Number** 2T3FLRFV9KC****

12 **Summary of Complaint**

13 Maintenance requires message appeared. Coolant bypass valve/tube needs
14 replacement. 2 Days from the end of factory warranty.

15 **NHTSA ID Number:** 11472240

16 **Incident Date** June 15, 2022

17 **Complaint Date** July 3, 2022

18 **Vehicle Identification Number** 2T3W1RFV3KC****

19 **Summary of Complaint**

20 I got a "Engine Maintenance Required" warning message. I check with the dealer, the
21 dealer inspected and told about a faulty coolant bypass valve which the dealership told
22 us a common problem for Toyota RAV4 model year 2019,2020,2021. The dealer told
23 to always check if the engine temperature is shooting. They asked me to order the part
24 and it took close to a week to get the part and then to replace it. A faulty coolant
25 bypass valve risked my vehicle of a failure of the cooling system and so the engine. I
26 had to pay \$126.25 for the part and \$658.08 labor charge to replace the part. Since it is
27 a common problem the manufacturer has to recall and replace the faulty part and pay
28 the cost of the part and labor for replacing the faulty part.

29 **NHTSA ID Number:** 11517025

30 **Incident Date** April 10, 2023

31 **Complaint Date** April 14, 2023

32 **Vehicle Identification Number** 2T3P1RFV8LW****

33 **Summary of Complaint**

34 The contact owns a 2020 Toyota Rav4. The contact stated that soon after he had the
35 vehicle serviced at the dealer, the "engine maintenance required" message was
36 displayed. The contact stated that the warning advisory remained displayed, which
37 rendered the speedometer unviewable. The vehicle was taken back to the dealer and
38 was diagnosed with a defective coolant bypass valve. The manufacturer was notified of
the failure, and the contact was informed that the vehicle was not under recall. The
vehicle was not repaired and remained in the possession of the dealer. The parts to
repair the vehicle was on backorder. The failure mileage was approximately 66,000.

⁸ The following complaints are reproduced as they appear online. Any typographical errors are attributable to the original author.

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33 WEST MISSION STREET, SUITE 201
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NHTSA ID Number: 11517011
Incident Date April 14, 2023
Complaint Date April 14, 2023
Vehicle Identification Number 2T3W1RFV9LW****

Summary of Complaint
At about 51,000 miles the engine maintenance required light came on. After taking it to the dealership I found out it was the coolant bypass valve.

NHTSA ID Number: 11518403
Incident Date April 22, 2023
Complaint Date April 22, 2023
Vehicle Identification Number 2T3C1RFVXLW****

Summary of Complaint
I took my vehicle to the dealership (Doral Toyota) on 22-Apr-23 and spoke to Mr. Rafael Sanchez (title: Toyota Advisor) because the "Engine Maintenance Required" light went off. Mr. Sanchez verified the vehicle and confirmed that the "Engine Coolant Bypass Valve" was defective but he stated that there are 597 other owners also waiting for the same part. They were not able to resolve the issue and no estimated time to get the part.

NHTSA ID Number: 11519961
Incident Date April 29, 2023
Complaint Date May 2, 2023
Vehicle Identification Number 2T3H1RFV5LC****

Summary of Complaint
Engine maintenance required notification came on. Car is only 3 years old. Dealership stated that the coolant bypass valve needs to be replaced and it could potentially cause a fire. Service professional at the dealership stated that this is a common issue and most of the time Toyota warranty doesn't want to repair it, also said that it should be recalled. I have also seen hundreds of people complain about this on Rav4 forums.

NHTSA ID Number: 11521078
Incident Date May 8, 2023
Complaint Date May 8, 2023
Vehicle Identification Number 2T3C1RFV5KW****

Summary of Complaint
The Coolant Bypass Valve went bad, and apparently it's been happening frequently to a lot of peoples Toyotas. Also unsafe because I have to wait for the part, which is on back order, because so many of them are faulty. This need to me recalled!

NHTSA ID Number: 11522469
Incident Date May 17, 2023
Complaint Date May 17, 2023
Vehicle Identification Number 2T3C1RFV7KC****

Summary of Complaint
2019 Toyota Rav4 Premium Engine Maintenance light visit dealer popped up on the vehicle. Researching online apparently the coolant bypass valve malfunctioning is a recurring issue with the 2019 Toyota Rav4, not sure why a recall has not been done yet for this vehicle. Went to the dealer to have the vehicle looked at, before having it diagnosed the service person stated it is probably the coolant bypass valve and that the part is on back order, vehicle was put on the machine to have it diagnosed and confirmed that the Coolant Bypass Valve will need to be replaced. The only warning light that it gave me was Engine Maintenance light came on. The service advisor said the vehicle is perfectly fine to drive till they get the part in, which still concerns me because of the engine. I am having to pay out of pocket to get it repaired but after talking

1 to the service people and researching online from other people, there really should be a
2 recall for the Coolant Bypass Valve.

3 **NHTSA ID Number:** 11523247

4 **Incident Date** May 22, 2023

5 **Complaint Date** May 22, 2023

6 **Vehicle Identification Number** 2T3H1RFV9LW****

7 **Summary of Complaint**

8 The contact owns a 2020 Toyota Rav4. The contact stated that after starting the vehicle,
9 the check engine warning light illuminated. The vehicle was taken to an independent
10 mechanic, where a failure code was retrieved for an engine coolant bypass valve circuit
11 short, and it was diagnosed that the bypass hose and valve needed to be replaced. The
12 local dealer was made aware of the failure; however, the vehicle was not repaired. The
13 contact referenced the failure to NHTSA Campaign Number: 20V064000 (Engine and
14 Engine Cooling). The manufacturer was made aware of the failure. The approximate
15 failure mileage was 30,000.

16 **NHTSA ID Number:** 11526457

17 **Incident Date** May 13, 2023

18 **Complaint Date** June 11, 2023

19 **Vehicle Identification Number** 2T3W1RFV2KW****

20 **Summary of Complaint**

21 On May 13, 2023, 'Engine Maintenance Required-Visit Your Dealer' warning
22 appeared on my console. I immediately brought the vehicle to the Toyota dealer. I was
23 told the Coolant Bypass Valve went bad. This was at roughly 45,000 miles. I had
24 previously purchased a 'No deductible extended warranty' from this same Toyota
25 dealer. Now they tell me this 'Valve' is not covered under warranty. I was charged
26 \$887.99 for repair of this 'Valve'. As this could cause the engine to overheat, causing
27 additional damage, it most certainly is a safety issue.

28 **NHTSA ID Number:** 11527763

Incident Date June 19, 2023

Complaint Date June 16, 2023

Vehicle Identification Number 2T3J1RFV6KC****

Summary of Complaint

Engine maintenance required light came on. Vehicle was diagnosed with needing a
new coolant bypass valve. Researching online and in Toyota groups, this is a
widespread issue. Even the dealer said they have had many of these repairs yet Toyota
has not issued a recall. This is a repair with a cost of \$500-\$1000 and a safety concern
but Toyota has not addressed it.

NHTSA ID Number: 11528349

Incident Date June 21, 2023

Complaint Date June 22, 2023

Vehicle Identification Number 2T3W1RFV0LW****

Summary of Complaint

Per my research and talking with dealerships, the coolant bypass valve on this
generation of RAV4's is a known issue at 45,000 miles. Many users online and the
dealership report seen many cars experiencing the same issue but it's not currently
under recall and would be a \$1300 fix right now to drive my car safely without blowing
up the engine.

NHTSA ID Number: 11529429

Incident Date June 25, 2023

Complaint Date June 28, 2023

1 **Vehicle Identification Number** 2T3W1RFV4LC****

2 **Summary of Complaint**

3 The Coolant Bypass Valve failed for my RAV4 at 59,210 miles. This was confirmed to
 4 me by Hoover Toyota. The part has not been inspected by the manufacture, police,
 5 insurance representatives, or any others. I had a message appear at 59,202 miles on my
 6 dashboard screen that said, "Engine Maintenance Required." I have already gotten
 Hoover Toyota to fix my part. My concern comes in part that reading through online
 forums, it appears this is a very regular/common problem for RAV4s (2019-2022) and
 seems to happen between 45,000 - 65,000 miles. If this is a known issue, I am curious
 as to why Toyota has not recalled this part since you wouldn't expect a car under 5 years
 old and driven less than 100,000 miles to have this kind of problem.

7 **NHTSA ID Number:** 11530087

8 **Incident Date** June 5, 2023

9 **Complaint Date** July 3, 2023

10 **Vehicle Identification Number** 2T3H1RFV6LC****

11 **Summary of Complaint**

12 Only 46,000 miles and needing a Coolant Bypass Valve replacement

13 **NHTSA ID Number:** 11530286

14 **Incident Date** July 3, 2023

15 **Complaint Date** July 4, 2023

16 **Vehicle Identification Number** 2T3W1RFV4NW****

17 **Summary of Complaint**

18 The Engine Coolant Bypass Valve is a known issue across the 2019-Present RAV4
 19 generation. We have taken our RAV4 to the dealership numerous time for the
 20 "Maintenance Required Soon" message that comes up when the car starts. The dealer
 21 always says that is is just a reminder for us to get our vehicle serviced at 20,000. The
 22 service interval message is supposed to only come on at every 5,000, not every 3,000.
 23 We took it by our local auto parts store, and the man that works there has a 2019 RAV4
 24 that has the same problem. They had to take theirs to the dealer and have the Coolant
 25 Bypass Valve replaced. If not addressed soon, it could cause the engine to overheat.
 26 The man at the auto parts store said it doesn't hurt to drive it but it is best not to prolong
 27 it. There needs to be an investigation of a recall started on this, as it can be a very
 28 confusing situation. It makes people think the car is just reminding you of your service
 maintenance interval. But this is not what this message means. When you take it to the
 dealer, they are clueless and they will give you the runaround. [XXX] of Pell City,
 Alabama. 2022 Toyota RAV4 XLE purchased from Serra Toyota of Birmingham
 INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION
 ACT (FOIA), 5 U.S.C. 552(B)(6).

22 **NHTSA ID Number:** 11530434

23 **Incident Date** June 28. 2023

24 **Complaint Date** July 5, 2023

25 **Vehicle Identification Number** 2T3W1RFV8LW****

26 **Summary of Complaint**

27 The coolant bypass valve failed. If this was not repaired it could have resulted in
 28 leaking coolant which would eventually cause engine failure. The issue started with a
 message on the dash stating there was "engine maintenance required" on 6/28/2023. I
 took my vehicle to my service provider the next day, 06/29/2023. The dealer service
 tech knew exactly what the issue was before diagnostics because they had 4 RAV4's
 come in that week with this same issue. The bypass valve was replaced on this visit and
 I paid for the job. I have since seen many posts online with this same failure on 2019
 and 2020 RAV4 models. It appears Toyota had a recall for this in 2020 for Hybrid

1 RAV4's and some non hybrid RAV4's but apparently my vehicle and many others were
 2 not included in this recall. [https://www.greencarreports.com/news/1127163_some-](https://www.greencarreports.com/news/1127163_some-2019-2020-toyota-and-lexus-hybrids-recalled-for-coolant-leak-concern)
 3 2019-2020-toyota-and-lexus-hybrids-recalled-for-coolant-leak-concern This recall
 needs to be extended for the other vehicles like mine that are currently being affected
 by this faulty part.

4 **NHTSA ID Number:** 11531396
 5 **Incident Date** July 10, 2023
 6 **Complaint Date** July 10, 2023
 7 **Vehicle Identification Number** 2T3J1RFV0LC****

8 **Summary of Complaint**

9 Coolant bypass valve required replacement due to faulty equipment, causing sensor to
 10 read "engine maintenance required". Costs \$650 to replace and dealership will not
 11 cover in warranty or admit fault. Many other Rav 4 owners are having same issue. This
 12 should not be on the customer, but rather Toyota for having faulty equipment in vehicle.
 13 Also "engine maintenance required" sensor will not go away. Since this is not an engine
 14 issue, this is unsafe, false alarming.

15 **NHTSA ID Number:** 11531381
 16 **Incident Date** January 30, 2023
 17 **Complaint Date** July 10, 2023
 18 **Vehicle Identification Number** 2T3W1RFV8LC****

19 **Summary of Complaint**

20 Coolant Bypass Valve breaks easily and in many RAV4s and Corollas. When this
 21 happens an "Engine Maintenance Required" see your dealer message comes up in the
 22 heads up display and won't go away. Makes seeing the important details of speed, miles
 23 to empty, etc on the screen impossible read. It is a known issue by Toyota and they
 24 refuse to do a recall.

25 **NHTSA ID Number:** 11531562
 26 **Incident Date** July 10, 2023
 27 **Complaint Date** July 11, 2023
 28 **Vehicle Identification Number** 2T3P1RFV2LC****

Summary of Complaint

Car has 26K miles on it (3 year 2 months old). A light appears saying Emergency
 Engine Maintenance is required. After research as this error is not in manual, found out
 it was a failed coolant bypass valve and this was a common failure/faulty equipment
 but we are being asked to pay full price to repair. A simple internet search shows 100's
 of consumers with same issue in same model and low miles.

NHTSA ID Number: 11531798
Incident Date June 15, 2023
Complaint Date July 12, 2023
Vehicle Identification Number 2T3W1RFV4LC****

Summary of Complaint

Dash reported "Engine Maintenance Required / Visit Dealer" - dealer said it was a
 "coolant bypass hose", not covered by any warranty. \$100 part but engine-out
 procedure costs \$800. This vehicle has less than 40,000 miles.

NHTSA ID Number: 11532327
Incident Date June 15, 2023
Complaint Date July 14, 2023
Vehicle Identification Number 2T3P1RFV0LW****

Summary of Complaint

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 SANTA BARBARA, CALIFORNIA 93101

1 At approximately 60K on my 2020 Toyota Rav4 XLE The Engine Maintenance
 2 Required Visit Your Dealer message came on my dash. It's been a known issue for
 3 many Rav4's not to mention other Toyota models for the engine coolant bypass switch
 4 to have gone bad. The vehicle is available for inspection upon request. My safety and
 whom I may be transporting can be put at risk if the engine refuses to start or operate
 as normal and can leave us stranded. The problem is known by Toyota and many of
 these valves have been replaced at the dealer for a very high cost.

5 **NHTSA ID Number:** 11532312
 6 **Incident Date** July 1, 2023
 7 **Complaint Date** July 14, 2023
 8 **Vehicle Identification Number** 2T3W1RFV7LW****

9 **Summary of Complaint**

10 2020 Toyota Rav4, just around 25K miles, took to dealership to get regular maintenance
 11 service, (oil change, tire rotation). After a couple days, "engine maintenance required"
 12 message pops up. Plugged in code reader and brings up code "P268115" for
 13 "Engine Coolant Bypass Valve Circuit Short to Battery or Open". This issue is popping
 14 up for many recent year Toyota models (Rav4, Camry, Corolla) and is not being
 15 repaired by Toyota for free. They are charging \$600 - \$1000 to repair faulty part that is
 16 not the owner's fault and issue needs to be recalled.

17 **NHTSA ID Number:** 11532309
 18 **Incident Date** July 1, 2023
 19 **Complaint Date** July 14, 2023
 20 **Vehicle Identification Number** JTMP1RFV7KD****

21 **Summary of Complaint**

22 Getting the following issue: 2019 RAV4 : P268115 Engine Coolant Bypass valve
 23 circuit short to battery or open This is happening to a lot of other cars - it seems like
 24 Toyota has a faulty coolant valve

25 **NHTSA ID Number:** 11532631
 26 **Incident Date** June 21, 2023
 27 **Complaint Date** July 17, 2023
 28 **Vehicle Identification Number** 2T3H1RFV4KC****

Summary of Complaint

Engine maintenance required visit your dealer alert on screen. Seems to happen when
 the A/C is in use. Took it to a Toyota dealership for a diagnostic test and they said it
 was the Engine coolant bypass valve. The diagnostic test was \$180. They mentioned
 the part was on backorder and I have been waiting for the part for a month now. The
 alert will not go away at all if the A/C is in use. The dealership mentioned this has been
 happening frequently with RAV 4s. It will cost approximately \$771 to repair and \$189
 for a coolant flush.

NHTSA ID Number: 11533789
Incident Date July 7, 2023
Complaint Date July 22, 2023
Vehicle Identification Number 2T3W1RFV9KW****

Summary of Complaint

"Engine maintenance required - see dealer" message around 60k miles and
 subsequent coolant bypass valve issue should be a RECALL for 2019 RAV4s. Toyota
 either deliberately enabled this message to pop up to require vehicle owners to spend
 over \$600 at Toyota dealerships, installed faulty coolant bypass valves, and/or failed to
 properly code messages in the vehicles. The message will not go away and requires
 only Toyota to disable it. Thousands of owners have had to take their vehicles into

1 Toyota dealerships to correct the message and/or valve issue, costing at least \$600. For
2 these reasons, this should be a RECALL.

3 **NHTSA ID Number:** 11533903

4 **Incident Date** July 21, 2023

5 **Complaint Date** July 23, 2023

6 **Vehicle Identification Number** 2T3W1RFV1LC****

7 **Summary of Complaint**

8 Coolant Bypass Valve Replacement required on my 2020 Rav 4. I have 33,000 miles
9 & purchased in 2019, so it is not covered under warranty. The dealer is charging me
10 over \$850 to replace. I have been told by the Dealer that this is a "KNOWN" problem
11 with this and other Toyota models. Why is there not a recall or extended warranty on
12 this repair if so many owners are paying hundreds of dollars on relatively newer cars
13 with the same FAULTY PRODUCT? I would like Toyota to reimburse me. I am having
14 the car repaired tomorrow because I have been told it is dangerous to use the vehicle in
15 this condition. Please assist me with ways to get reimbursed from Toyota and for others
16 to receive repairs at no cost, especially on vehicles under 5 or 6 yrs old. thank you.

17 **NHTSA ID Number:** 11534056

18 **Incident Date** July 21, 2023

19 **Complaint Date** July 24, 2023

20 **Vehicle Identification Number** 2T3J1RFV4KC****

21 **Summary of Complaint**

22 Warning Engine Maintenance light popped up on 2019 RAV4 Adventure, with
23 notification to see dealership. Took vehicle in and was informed that the coolant
24 bypass valve has internal circuit failure. Vehicle has has 23,000 miles, this should not
25 be happening to a relatively new car. Appears to be a widespread defect per the Internet:
26 [XXX] [XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF
27 INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

28 **NHTSA ID Number:** 11534354

29 **Incident Date** July 25, 2023

30 **Complaint Date** July 25, 2023

31 **Vehicle Identification Number** 2T3C1RFV3KC****

32 **Summary of Complaint**

33 2019 Vehicle with less than 45K miles Got a message to take the car to the dealership.
34 Dealership tells me that the coolant bypass valve needs to be replaced. Dealership
35 representative tells me this is a common issue with cars like mine and the part is back
36 ordered for an indeterminate amount of time. After doing some research, I see this is a
37 major issue with quite a few Toyota models, not just Rav4.

38 **NHTSA ID Number:** 11534608

39 **Incident Date** July 23, 2023

40 **Complaint Date** July 26, 2023

41 **Vehicle Identification Number** 2T3J1RFV6LC****

42 **Summary of Complaint**

43 The coolant bypass valve is defective on a 3 year old single owner, well maintained
44 under 50,000 miles vehicle. This is a wide spread and known issue for Toyota which
45 can result in engine overheating, causing potentially unsafe situations to occur for the
46 driver. This can also severely damage the engine.

47 **NHTSA ID Number:** 11535103

48 **Incident Date** May 9, 2023

49 **Complaint Date** July 28, 2023

50 **Vehicle Identification Number** 2T3P1RFV1LC****

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Summary of Complaint

Coolant Bypass Valve failure/malfunction. Frequently reported issue for model/year.

NHTSA ID Number: 11535231
Incident Date June 26, 2023
Complaint Date July 29, 2023
Vehicle Identification Number 2T3K1RFV3KC****

Summary of Complaint

Vehicle had been in for routine maintenance 6 weeks prior. Around 46k miles, the check engine light came on requiring me to bring it back to the Toyota dealer. I wasn't able to bring it to the dealer for about 6 days after it came on due to appointment availability. Once I brought it in, they told me the coolant bypass valve had a circuit short and needed to be replaced. This part was replaced and is unable to be inspected. This is a safety issue especially during the summer as this short could cause the engine to overheat.

NHTSA ID Number: 11535175
Incident Date October 18, 2023
Complaint Date July 29, 2023
Vehicle Identification Number 2T3F1RFV1LC****

Summary of Complaint

The vehicle has a message engine maintenance required. The Toyota dealership diagnostic was that the coolant bypass valve needed to be replaced. The dealer told us they are getting at least 6 Rav4 a week coming in with the same issue. The part replacement isn't covered manufacturer under warranty. This needs to be a recalled part.

NHTSA ID Number: 11535806
Incident Date July 27, 2023
Complaint Date August 1, 2023
Vehicle Identification Number 2T3W1RFV6KC****

Summary of Complaint

Engine maintenance notification came on and car was taken in for diagnosis. It seem the coolant bypass valve was the issue and this seems to be an issue for Camry's, Corrolas, and the RAV4s. Toyota wanted to charge an outrageous amount to fix this when it is a known issue across the board and is widely talked about online through research.

NHTSA ID Number: 11536047
Incident Date August 2, 2023
Complaint Date August 2, 2023
Vehicle Identification Number 2T3W1RFV6LW****

Summary of Complaint

Coolant bypass valve just gave out on car was informed by dealership that this is an ongoing problem with my make of car.

NHTSA ID Number: 11536614
Incident Date August 4, 2023
Complaint Date August 4, 2023
Vehicle Identification Number JTMA1RFV5KJ****

Summary of Complaint

Check engine light on for coolant bypass valve, apparently car is over heating ?

NHTSA ID Number: 11536648
Incident Date August 4, 2023
Complaint Date August 5, 2023

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1 **Vehicle Identification Number** 2T3H1RFV0KW****

2 **Summary of Complaint**

3 My Engine maintenance notification came on this week and I took my car for diagnosis.
 4 It was determined that it is my the coolant bypass valve was the issue and this seems to
 5 be an issue for RAV4s. I researched Recalls for this issue and found a recall code
 6 20TA04 for 2019 - 2020 RAV4 Toyota .I currently drive a 2019 RAV4 but this recall
 doesn't show under my VIN # But I am having the same issue. Its frustrating when this
 is a known issue that the dealership is aware of but wants charge large sums of money
 to fix a problem that is not normal wear and tear. chrome-
 extension://efaidnbmnnnibpcajpcglclefindmkaj/https://static.nhtsa.gov/odi/rc1/2020/R
 CMN-20V064-1370.pdf

7 **NHTSA ID Number:** 11536679

8 **Incident Date** August 5, 2023

9 **Complaint Date** August 2, 2023

10 **Vehicle Identification Number** 2T3P1RFV6LC****

11 **Summary of Complaint**

12 There is a known issue with the coolant bypass valve failing. Dealerships are charging
 13 over \$600 to fix and many people are having the same issue. The engine maintenance
 14 required message is persistent, and will not allow you to bypass it.

15 **NHTSA ID Number:** 11536983

16 **Incident Date** August 7, 2023

17 **Complaint Date** August 7, 2023

18 **Vehicle Identification Number** 2T3P1RFV1KC****

19 **Summary of Complaint**

20 "Engine maintenance required - Visit Dealer" warning came on. Vehicle was diagnosed
 21 with needing a new coolant bypass valve. Researching online, and in Toyota groups,
 22 this is a known and widespread issue. The dealer stated they have had many of these
 23 repairs come in, yet Toyota has not issued a recall or TSB. This is a repair costing
 24 between \$500-\$1000. That's a healthy sum of money to be spending on a fairly new
 25 car.

26 **NHTSA ID Number:** 11537282

27 **Incident Date** August 7, 2023

28 **Complaint Date** August 8, 2023

Vehicle Identification Number 2T3H1RFV4KC****

Summary of Complaint

Coolant bypass valve failure, which can result in Engine overheating or complete
 seizure, which can endanger passengers in a vehicle. "Engine Maintenance Required"
 message shows up on dash and cannot be cleared away. South Bay Toyota rep
 acknowledged that this has been an issue for model year 2019.

NHTSA ID Number: 11537532

Incident Date July 19, 2023

Complaint Date August 9, 2023

Vehicle Identification Number 2T3C1RFV5LC****

Summary of Complaint

The engine maintenance required light came on at 56,000 miles and would not reset
 even after a scheduled oil change. The Toyota dealership neglected to evaluate this light
 when I brought my car in for servicing. After getting a diagnostic, it was found that
 the coolant bypass valve needed to be replaced which was at least \$600. I was advised
 that the vehicle was to not be driven long distances as it could result in more damage to
 the car. This is my 4th expensive repair on this 3 year old car in 1 year. This is my very

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1 first Toyota, & I am extremely disappointed. I bought a Toyota anticipating a low
2 maintenance, high quality vehicle and have had nothing but issues.

NHTSA ID Number: 11537483
Incident Date August 4, 2023
Complaint Date August 9, 2023
Vehicle Identification Number 2T3EWRV9KW****

Summary of Complaint
3 Vehicle take to dealer to diagnose seatbelt warning buzzer and SRS inoperative light
4 illuminated. The dealer diagnosed the problem as a defective coolant bypass valve. This
5 seems to be a rather common diagnosis. With the air bag system inoperative, I feel
6 insecure driving the car without this important safety system.

NHTSA ID Number: 11537932
Incident Date August 11, 2023
Complaint Date August 11, 2023
Vehicle Identification Number 2T3J1RFV2LC****

Summary of Complaint
7 A known issue that has been occurring to many people with the coolant bypass valve
8 system going out very soon after purchasing. I bought a 2020 Toyota rav4 and my
9 bypass coolant valve has malfunctioned and needs replaced and of course is outside of
10 the warranty. Per many google searches this is a common issue and should be
11 addressed.

NHTSA ID Number: 11538088
Incident Date August 12, 2023
Complaint Date August 12, 2023
Vehicle Identification Number 2T3W1RFV7LC****

Summary of Complaint
12 Coolant Bypass valve internal short.

NHTSA ID Number: 11538080
Incident Date July 29, 2023
Complaint Date August 12, 2023
Vehicle Identification Number 2T3C1RFV8KW****

Summary of Complaint
13 I was driving my 2019 rav 4 and a warning came on my screen that stated “ engine
14 maintenance required. Visit dealer.” No check engine light came on just this warning
15 that would not go away. I went to orileys to see is they could tell me what was wrong
16 and they were unable to read it since it was not a check engine light. The orileys
17 employee told me I had to take it to a Toyota dealership to find out exactly what was
18 wrong with it. I contacted my local dealership and they confirmed that it was a coolant
19 bypass valve that failed and that he has seen this warning pop up on at least 10 Rav 4's
20 and that every time it is the coolant bypass valve that has failed.

NHTSA ID Number: 11538713
Incident Date January 10, 2023
Complaint Date August 15, 2023
Vehicle Identification Number 2T3H1RFV1LW****

Summary of Complaint
21 The engine maintenance light came on to visit the dealer. It's because of the Coolant
22 Bypass Valve.

NHTSA ID Number: 11539105
Incident Date August 10, 2023

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Complaint Date August 17, 2023
Vehicle Identification Number 2T3F1RFV4LC****

Summary of Complaint
Coolant Bypass Valve failure at 41K miles. Confirmed by dealership. "Engine Maintenance" warning light came on before taking to dealership.

NHTSA ID Number: 11539395
Incident Date August 16, 2023
Complaint Date August 18, 2023
Vehicle Identification Number 2T3Y1RFV6LC****

Summary of Complaint
My Engine Maintenance Required light had appeared on dashboard and found out that is my coolant bypass valve that needed to be replaced. had on online, to find that this is a issue with Toyota, that people had to have this replaced. I had purchased my vehicle back in 2021, and just had this issue 2023. I took to the dealership and was told that it was that part. they are replacing the part going through the extended warranty insurance, but this is concerning, that if this OE part has a defect, that once my warranty expires that I will have this problem again and have no way on coverage.

NHTSA ID Number: 11539586
Incident Date August 4, 2023
Complaint Date August 19, 2023
Vehicle Identification Number 4T3EWRV1LU****

Summary of Complaint
My car is leaking coolant and needs a new coolant bypass valve. It seems like it is happening to every rav4 and camry. They put in faulty parts.

NHTSA ID Number: 11539493
Incident Date August 17, 2023
Complaint Date August 19, 2023
Vehicle Identification Number 2T3K1RFV2LC****

Summary of Complaint
I was driving and out of nowhere this warning came on engine maintenance required, and this now a normal maintenance required that means an oil change. The problem with this warning is the coolant bypass valve, and I'm not the only one with this issue, my car has only 32100 miles only, this a ridiculous for a new car. Plus it seem that this issue only comes on with the A/C on

NHTSA ID Number: 11540885
Incident Date August 21, 2023
Complaint Date August 26, 2023
Vehicle Identification Number 2T3P1RFV1KC****

Summary of Complaint
Engine Maintenance Required light came on. Got it checked out by Toyota Dealer and the coolant bypass valve needs to be replaced. It seems to be a common problem with RAV4s.

NHTSA ID Number: 11541255
Incident Date July 28, 2023
Complaint Date August 28, 2023
Vehicle Identification Number 2T3C1RFVXKC****

Summary of Complaint
"Engine Maintenance Required, Visit Your Dealer" warning message pop up on 2019 Toyota Rav4. Then the vehicle was taken to Toyota Dealer which they diagnosed as Coolant Bypass Valve failure. The dealer charged an outrageous amount to replace

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1 that valve with hose assembly. After researching online, this is a widespread issue in
2019 and newer Toyota Rav4.

NHTSA ID Number: 11541186
Incident Date June 1, 2023
Complaint Date August 28, 2023
Vehicle Identification Number 2T3W1RFV4KC****

Summary of Complaint
Engine warning that cannot be cleared - "Engine Maintenance Required" displays on Multi-information display. Coolant Bypass Valve is the problem according to Toyota, and they want \$1000 to fix it. Happens to many right after warranty expires.

NHTSA ID Number: 11541774
Incident Date April 19, 2023
Complaint Date August 30, 2023
Vehicle Identification Number 2T3F1RFV8LC****

Summary of Complaint
Coolant Bypass Valve on my 2020 RAV4. There needs to be a recall; even Toyota dealerships in the Dallas/Fort Worth metroplex say that there needs to be a recall. Service advisors say this is a big problem they see daily and with all cars and at all mileage. The cost to replace the Coolant Bypass Valve in my car = \$855-RIDICULOUS!! In addition, due to the constant "Engine Maintenance Required" message on the screen triggered by the Coolant Bypass Valve needing to be replaced, that can't be removed, all other car related information and/or service issues, is unable to be seen...which is dangerous!! Toyota used to be one of the best car manufacturers for quality and reliability, but now, their quality has tanked...

NHTSA ID Number: 11542095
Incident Date September 1, 2023
Complaint Date September 1, 2023
Vehicle Identification Number 2T3W1RFV2KC****

Summary of Complaint
COOLANT BYPASS VALVE FAILED. APPARENTLY IT IS A COMMON ISSUE WITH THIS VEHICLE.

NHTSA ID Number: 11542436
Incident Date September 1, 2023
Complaint Date September 4, 2023
Vehicle Identification Number 2T3P1RFV8LC****

Summary of Complaint
Toyota engine coolant bypass trouble code. Seems to be wide spread reports amongst customers with newer generation 5 Toyota vehicles. Dealer quotes the 20 minute repair will cost \$700-900 USD & the part itself is on back order due to the increasing failure rate of the part. The faulty part seems to affect the cooling system of the car but due to the increasing amount of reports & failures of the same part, the dealer should be recalling & replacing the part for free rather than billing customers \$700+ dollars. For reference, my vehicle is a model year 2020 & has 19,000 miles & the part has already failed.

NHTSA ID Number: 11542980
Incident Date August 12, 2023
Complaint Date September 6, 2023
Vehicle Identification Number 2T3J1RFVXLC****

Summary of Complaint

1 This is a common issue for the 5th Generation Rav4. It doesnt read fault codes on the
 2 OBD2 scanner, but the ENGINE MAINTENANCE alert continuously comes up
 3 because of a faulty coolant bypass hose/valve. Toyota OEM Part # 16260-f0010. This
 4 should be a recall. Instead, we are paying out of pocket to get this fixed.

5 **NHTSA ID Number:** 11543416
 6 **Incident Date** September 7, 2023
 7 **Complaint Date** September 8, 2023
 8 **Vehicle Identification Number** 2T3P1RFV3KC****

9 **Summary of Complaint**

10 Just received Engine maintenance required message that can not be cleared. I pulled in
 11 to my local firestone who looked up the error code p268115. This turns out to be the
 12 need to replace a coolant bypass valve and seems to be a pretty common issue with
 13 RAV4s but has yet to be on a recall. This can cause the vehicle to stall in traffic and
 14 overheat causing a major safety issue. the car is at about 24,000 miles.

15 **NHTSA ID Number:** 11543416
 16 **Incident Date** September 4, 2023
 17 **Complaint Date** September 9, 2023
 18 **Vehicle Identification Number** 2T3W1RFV8LC****

19 **Summary of Complaint**

20 In my 2020 Toyota RAV4, a "Engine Maintenance Required: See Dealer" message
 21 came onto my dashboard and would not go away when I cleared it. I took it into the
 22 dealership, and they stated that they had many RAV4's come in with this same message.
 23 They said it was most likely the engine's coolant bypass valve. After diagnosing the
 24 problem, the dealership confirmed it was the coolant bypass valve. This was very
 25 expensive to fix, and for a car that is just over 3 years old it seems unusual for this to
 26 occur so soon and to so many other card within the same year and time period. This
 27 part needs to be recalled and reimbursement should be provided to those who had to
 28 pay hundreds of dollars to get this fixed when it is very likely a faulty part.

NHTSA ID Number: 11543747
Incident Date September 2, 2023
Complaint Date September 11, 2023
Vehicle Identification Number 2T3C1RFV7KC****

Summary of Complaint

Engine coolant bypass. Apparently this is a MAJOR, common and CONSISTENT
 issue that is extremely dangerous! I'm not sure why this hasn't been recalled yet. please
 please PLEASE provide us with some information

NHTSA ID Number: 11544348
Incident Date September 9, 2023
Complaint Date September 13, 2023
Vehicle Identification Number 2T3H1RFV0LC****

Summary of Complaint

Coolant bypass valve failure my car has less than 50k Dealerships informed me that
 they fix around 10 a month for that part there is a defect regarding this pump

NHTSA ID Number:
Incident Date September 15, 2023
Complaint Date September 16, 2023
Vehicle Identification Number 2T3G1RFV0KW****

Summary of Complaint

Wide spread issue with "engine coolant bypass valve". This has been going on for a
 long time and a lot of Toyota rav4 drivers are affected. Engine maintenance required
 pops up in the middle of the screen unexpectedly while driving which is distracting and

1 a safety issue. Toyota refuses to take accountability for their faulty valves and issue a
 2 recall. Please help with this issue. If you google this, it will show there are so many
 3 people affected by this.

3 **NHTSA ID Number:** 11545208
 4 **Incident Date** September 18, 2023
 5 **Complaint Date** September 18, 2023
 6 **Vehicle Identification Number** JTMH1RFV1KD****
 7 **Summary of Complaint**

8 At 46K miles it pop up out of no where and for no aparent reason engine maintanance
 9 required. Took the dealer it was the engine coolant bypass malfunctioning. Car has all
 10 maintanance up to date by toyota dealer.

11 **NHTSA ID Number:** 11545907
 12 **Incident Date** September 20, 2023
 13 **Complaint Date** September 21, 2023
 14 **Vehicle Identification Number** 2T3H1RFV6LC****
 15 **Summary of Complaint**

16 I have a 2020 RAV4 Toyota with 60,000 miles.. I have replaced the car battery 3 times
 17 now Toyota has no clue why. The 2nd battery only lasted 8 months and it was a name
 18 brand battery (Die Hard).. The engine problem started with a warning light that i could
 19 not turn off.. I took my car to Toyota and they told me right off (without checking) it
 20 was because of a Coolant Bypass Value, the Toyota service lady said it was her 5th
 21 Rav4 this week with the same problem. I checked on line and was surprised how many
 22 Rav4 customers were complaining about the same issue so i reported it to you.. Toyota
 23 is charging me \$900 to replace.

24 **NHTSA ID Number:** 11546203
 25 **Incident Date** September 20, 2023
 26 **Complaint Date** September 23, 2023
 27 **Vehicle Identification Number** 2T3C1RFV6KW****
 28 **Summary of Complaint**

Coolant Bypass Valve is faulty and is a common problem that is breaking for me.

18 **NHTSA ID Number:** 11546681
 19 **Incident Date** September 26, 2023
 20 **Complaint Date** September 26, 2023
 21 **Vehicle Identification Number** 2T3P1RFV5LC****
 22 **Summary of Complaint**

23 2020 Toyota RAV4 XLE purchased July of 2020. Just hit 35K miles and an "engine
 24 maintenance required" message appeared. The error message would not go away while
 25 driving and blocked the entire display screen. There is an issue with the Engine Coolant
 26 Bypass Valve that costs \$700-\$1000 to repair. The part and repairs are not covered by
 27 the 60,000 power terrain warranty.

28 **NHTSA ID Number:** 11546788
Incident Date September 20, 2023
Complaint Date September 27, 2023
Vehicle Identification Number 2T3F1RFV4LC****
Summary of Complaint

ENGINE COOLANT BYPASS VALVE failed internally causing an open circuit.

NHTSA ID Number: 11547135
Incident Date September 25, 2023
Complaint Date September 28, 2023

1 **Vehicle Identification Number** 2T3W1RFV3LC****

2 **Summary of Complaint**

3 My RAV4 doesn't even have 40,000 miles on it. I found out that the coolant bypass system needs to be replaced. After investigating online, I realized that this is a very common problem for RAVs. I believe this should be a recall!

4 **NHTSA ID Number:** 11547369

5 **Incident Date** September 28, 2023

6 **Complaint Date** September 29, 2023

7 **Vehicle Identification Number** 2T3H1RFV8KW****

8 **Summary of Complaint**

9 My car has been maintained and cared for routinely yet an engine maintenance light has come on. When I took it to the dealership I was told that I needed to spend \$600 to replace the engine coolant bypass valve. After researching how to change that and what the parts consisted of I found that HUNDREDS of not thousands of people who have 2019-2020 Toyota RAV4's have also experienced this problem. My car only has 90,000 miles on it and this is happening to other RAV4 owners who don't have near as many miles. I would happily pay this if it was just something that happened but after researching and finding out so so many others are experiencing the same problem in the same year model car it is frustrating that there isn't a recall on this part. If over 500 people are experiencing the same issue in the same type of car, that is 100% means for a recall. Thank you.

12 **NHTSA ID Number:** 11548247

13 **Incident Date** September 18, 2023

14 **Complaint Date** October 4, 2023

15 **Vehicle Identification Number** 2T3W1RFV8LW****

16 **Summary of Complaint**

17 My Toyota Rav4 2020 had engine maintenance issue drive to dealer alert. I diagnosed the problem an it is the coolant bypass valve that is not working. As I researched, I came to find out that this is a common problem for 2018- 2023 Rav4, Camry, and Corolla. This should be recalled having so many malfunctions on the vehicle.

18 **NHTSA ID Number:** 11548862

19 **Incident Date** October 6, 2023

20 **Complaint Date** October 8, 2023

21 **Vehicle Identification Number** 2T3W1RFV5KW****

22 **Summary of Complaint**

23 Engine Coolant Bypass Valve Got Bad At Only 38k Miles. Toyota asked 750\$ for 15min repair. And it common issue with 2019 Toyota's. That part should be recalled and replaced for free!

24 **NHTSA ID Number:** 11549279

25 **Incident Date** October 3, 2023

26 **Complaint Date** October 10, 2023

27 **Vehicle Identification Number** 2T3P1RFV3KC****

28 **Summary of Complaint**

The Engine Maintenance Alert appears on the screen. Mechanic confirmed it is the coolant bypass valve that has been shorted. Forums from other similar model RAV4 report the same issue at low mileage. This can cause the car to stall at high speeds.

NHTSA ID Number: 11549113

Incident Date October 10, 2023

Complaint Date October 10, 2023

Vehicle Identification Number 2T3W1RFV0KC****

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1 **Summary of Complaint**

2 "Engine Maintaince Soon" light continues to go off while driving the car making the
 3 dashboard impossible to use. Took the Rav4 to the dealership and said it would be \$536
 to replace the coolant bypass valve. It is a know issue on 2019 and newer Rav4 Toyota
 vehicles and needs to be recalled.

4 **NHTSA ID Number:** 11549450

5 **Incident Date** September 21, 2023

6 **Complaint Date** October 11, 2023

7 **Vehicle Identification Number** JTMW1RFV1KJ****

8 **Summary of Complaint**

9 At 41K miles it pop up out of no where and for no aparent reason engine maintainance
 10 required. Took the dealer it was the engine coolant bypass malfunctioning. Car has all
 11 maintainance up to date by toyota dealer.

12 **NHTSA ID Number:** 11549407

13 **Incident Date** October 11, 2023

14 **Complaint Date** October 11, 2023

15 **Vehicle Identification Number** 2T3P1RFV5LC****

16 **Summary of Complaint**

17 Got an engine maintenance required alert, took to Toyota and they advised the coolant
 18 bypass valve needs to be replaced at just 38,000 miles. Googled this and found out
 19 many 2020 RAV4 with the same issue at just under 40,000 miles. Also a common issue
 20 is the voltage being low and we already had to get the battery replaced once and still
 21 get alerts of it being low after replacement. Have to pay today \$765 for the coolant
 22 bypass to be replaced, will have the receipt later in the day.

23 **NHTSA ID Number:** 11549387

24 **Incident Date** October 10, 2023

25 **Complaint Date** October 11, 2023

26 **Vehicle Identification Number** 2T3W1RFV0LC****

27 **Summary of Complaint**

28 I have 2020 Toyota rav4 XLE and all of sudden I got "Engine Maintenance Required"
 When I turn off the AC, this message goes away but comes in when I turn on the AC. I
 believe, it is coolant bypass valve which needs to be replaced. I read my forums in
 [XXX] and [XXX] and many others have complaint about the same. Toyota has to have
 a recall on this poorly manufactured bypass value. INFORMATION REDACTED
 PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C.
 552(B)(6)

29 **NHTSA ID Number:** 11549835

30 **Incident Date** October 12, 2023

31 **Complaint Date** October 13, 2023

32 **Vehicle Identification Number** 2T3H1RFV7LC****

33 **Summary of Complaint**

34 RAV4 53,000 miles on and engine maintenance required prompt came on. No other
 35 warning lights on dash. Took it to dealership and it was a coolant bypass valve. Read
 36 up on it and it's been happening to many more people. Was originally charged \$900
 37 but got a discount ended up being \$825

38 **NHTSA ID Number:** 11549804

39 **Incident Date** September 1, 2023

40 **Complaint Date** October 13, 2023

41 **Vehicle Identification Number** 2T3G1RFV4LW****

42 **Summary of Complaint**

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1 -Inspection found coolant bypass valve seized recommendation, was to replace coolant
 2 hose with bypass valve. YES, the car is available for inspection upon any request -
 3 Safety risk unknown if not fixed -Michaels Toyota of Bellevue Washington confirmed
 4 on September 23rd 2023. I brought the car in originally on September 9th 2023 for a
 5 10,000 mileage service and oil change. when I called to ask why the engine maintenance
 6 notice wouldn't turn off. I was scheduled to bring the car back on September 23, 2023
 7 the needed part was not in stock nor covered by the factory or powertrain warranty with
 8 31,2002 miles on it. The warning light came on at the same time the service and oil
 9 change was due. I was stopped a month prior by a random mechanic who noticed the
 10 car was leaking abnormal amounts of what he said could be coolant on the passengers
 11 front undercarriage. This leaking has been happening for approximately a year and I
 12 was not notified the previous 3 times the car had been in for inspections.

13 **NHTSA ID Number:** 11549963
 14 **Incident Date** October 13, 2023
 15 **Complaint Date** October 14, 2023
 16 **Vehicle Identification Number** 2T3W1RFV9KC****

17 **Summary of Complaint**

18 2019 RAV4 experienced a check engine light and was overheating due to a
 19 faulty Coolant Bypass Valve made by Toyota. If unchecked and not replaced it could
 20 cause catastrophic failure to engine due to overheating. Toyota charges between \$600-
 21 1100 for replacement and it is not covered under warranty because Toyota claims it is
 22 not part of power train. Had to be replaced at dealer who explained that it is a common
 23 issue with this vehicle .

24 **NHTSA ID Number:** 11550007
 25 **Incident Date** September 22, 2023
 26 **Complaint Date** October 15, 2023
 27 **Vehicle Identification Number** 2T3G1RFV1LW****

28 **Summary of Complaint**

Engine maintenance required light came on. Scan code came up engine coolant
 bypass valve stuck open. Had to replace it. Cost me \$120 for the part with hoses
 attached.

NHTSA ID Number: 11550293
Incident Date October 16, 2023
Complaint Date October 16, 2023
Vehicle Identification Number 2T3A1RFV0LW****

Summary of Complaint

There was a warning message pop up all the time and I went to Toyota service. They
 said I need to pay for a coolant bypass valve replacement and it costs approx 600-800
 dollars. Also, they did not fill up for the engine oil even it's in very low to dry position.

NHTSA ID Number: 11550514
Incident Date October 16, 2023
Complaint Date October 17, 2023
Vehicle Identification Number 2T3H1RFV5LC****

Summary of Complaint

Part # 16260-f0010 - engine coolant bypass valve failed due to open or internal short
 and caused a Engine maintenance required warning which blocked other safety items
 on the display. This is a wide spread and known issue for Toyota which can result in
 engine overheating due to leaking coolant and result in engine failure (severely damage
 the engine) leading to engine stall and/or fire risk, causing potentially unsafe situations
 to occur for the driver and others in the vehicle. The error code is "P268115" for
 "Engine Coolant Bypass Valve Circuit Short to Battery or Open". Yes. the problem has

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1 been reported with NHTSA by others and from some dealers. When I took the vehicle
 2 into the dealership, and they stated that they had many RAV4's come in with this same
 3 message. They immediately said it is some engine component failure. There is a related
 4 NHTSA Campaign Number: 20V064000 (Engine and Engine Cooling) and also a recall
 5 related to it (but not for my vehicle's VIN): [XXX] Yes, the component has been
 6 inspected by the dealer. No, there was no warning lamps, messages or other symptoms
 7 of the problem prior to the failure, and when did they first appear Engine maintenance
 8 required warning sign did not go off which is good to have warning but blocking other
 9 safety items on the display dash board is a safety hazard. This could only be removed
 10 if we spend \$185 for diagnostics (which is charged knowingly that this has been a
 11 reported/unreported problem around the 2.5-4yr/30-60k miles for the vehicles with this
 12 part) and fixing the part at the dealer and resetting the code. The cost of the part is
 13 affordable but the labor charge of \$700 is exorbitant. The part replacement isn't covered
 14 under manufacturer's warranty. This part warrants recall as this is accidental poor
 15 manufacturing issue that is outside the scope of normal wear and tear and especially
 16 when the owner is not at fault. I'm expecting more repairs in future. INFORMATION
 17 REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA),
 18 5 U.S.C. 552(B)(6)

19 **NHTSA ID Number:** 11551073

20 **Incident Date** October 20, 2023

21 **Complaint Date** October 20, 2023

22 **Vehicle Identification Number** 2T3W1RFV3KC****

23 **Summary of Complaint**

24 Engine light came on for the engine Coolant bypass valve. Common problem. Toyota
 25 wants 800\$ to repair.

26 **NHTSA ID Number:** 11551118

27 **Incident Date** October 20, 2023

28 **Complaint Date** October 20, 2023

29 **Vehicle Identification Number** 2T3W1RFV0LW****

30 **Summary of Complaint**

31 Unknown engine maintenance light alert check light Recommend engine coolant
 32 bypass valve with gallon of coolant

33 **NHTSA ID Number:** 11551325

34 **Incident Date** October 2, 2023

35 **Complaint Date** October 23, 2023

36 **Vehicle Identification Number** 2T3H1RFV6LW****

37 **Summary of Complaint**

38 I have a 2020 Toyota RAV4, two weeks ago the following display appear "Engine
 39 Maintenance Require, Visit Your Dealer". I attempted to clear it but it cannot be done.
 40 I check online for similar issues. I found that the 2019 Toyota RAV4, Camry, Avalon,
 41 and Lexus ES300H vehicles have similar issue with the 'coolant bypass valve'. Mine is
 42 also a 2.5L 4-Cylinder Engine. I purchase my Rav4 on Feb 24, 2020. My car only has
 43 15,429 miles and a possible fire issue makes me nervous. I also notice than some
 44 preselected 2020 RAV4 were added to the recall, but not my RAV. Should I wait till
 45 my engine cracks or the cooling system fail?

46 **NHTSA ID Number:** 11551648

47 **Incident Date** October 23, 2023

48 **Complaint Date** October 24, 2023

49 **Vehicle Identification Number** 2T3G1RFV1LC****

50 **Summary of Complaint**

1 Engine coolant bypass valve needs to be replaced. Seems to be a very common issue in
2 2019-2023 RAV4s but Toyota has not issued a recall and is making customers pay
3 \$600-900 to fix. I ask that Toyota take responsibility and issue the recall now so this
4 can be fixed!

5 **NHTSA ID Number:** 11551642
6 **Incident Date** October 24, 2023
7 **Complaint Date** October 24, 2023
8 **Vehicle Identification Number** 2T3P1RFV3LC****

9 **Summary of Complaint**

10 2020 Toyota Rav4 - Cooling valve failure reported and is not covered under warranty
11 or recalled. Car only has 35k miles. This is apparently a common issue as the dealer
12 knew the problem before even doing any diagnosis. Once I told them the "Engine
13 Maintenance Required" message was on, they said "Oh, thats usually the coolant
14 bypass valve". If it is that common an issue it should be recalled. Toyota should take
15 ownership of this issue and fix / reimburse people for the problem. [XXX]
16 INFORMATION REDACTED PURSUANT TO THE FREEDOM OF
17 INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

18 **NHTSA ID Number:** 11551588
19 **Incident Date** October 21, 2023
20 **Complaint Date** October 24, 2023
21 **Vehicle Identification Number** 2T3W1RFV2LC****

22 **Summary of Complaint**

23 Coolant bypass valve shorts out and doesn't open or close to allow coolant through it.
24 "Engine Maintenance Required" message pops up for this. Toyota dealer inspected it
25 and it replacing the part. NOT covered under my warranty.

26 **NHTSA ID Number:** 11552224
27 **Incident Date** September 5, 2023
28 **Complaint Date** October 27, 2023
29 **Vehicle Identification Number** 2T3H1RFVXLC****

30 **Summary of Complaint**

31 Engine maintenance light came on and dealership indicates it's the coolant
32 bypass valve. This seems to be a common safety issue being ignored by both Toyota
33 and the transportation safety board...

34 **NHTSA ID Number:** 11552760
35 **Incident Date** October 30, 2023
36 **Complaint Date** October 30, 2023
37 **Vehicle Identification Number** 2T3P1RFVXKC****

38 **Summary of Complaint**

39 Engine Maintenance Required light on due to a faulty Coolant Bypass Valve. After
40 doing research online, there are many 2019 and 2020 RAV4 that have been having this
41 problem. The dealer said the same thing. Would like to put this on the record in hopes
42 that a recall will happen in the future.

43 **NHTSA ID Number:** 11553268
44 **Incident Date** November 2, 2023
45 **Complaint Date** November 2, 2023
46 **Vehicle Identification Number** 2T3H1RFVXLC****

47 **Summary of Complaint**

48 Coolant Bypass valve has stopped working, which can cause engine issues and forces
49 a message on LED display saying Engine Maintenance Required. Local Toyota
50 technician admitted that they've had 100's of these issues with the Rav4 recently and it
51 costs over \$500 to fix.

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NHTSA ID Number: 11553501
Incident Date August 20, 2023
Complaint Date November 3, 2023
Vehicle Identification Number 2T3H1RFV7LC****

Summary of Complaint

My 2020 Toyota RAV4, "Engine Maintenance Required: See Dealer" message came on my dashboard and would not go away when I cleared it. I took it into the dealership, and they stated that they had 1000s of RAV4's come in with this same message. They said it was the engine's coolant bypass valve. After diagnosing the problem, the dealership confirmed it was the coolant bypass valve. This was very expensive to fix, \$926.67, to be exact. For a car that is just over 3 years old, less than 40,000 miles, Toyota knew of these defective parts and still put them in to get the car out of their factory and onto a dealer's lot. They do not care if it kills anybody, just get the car sold. Toyota needs to have this bypass valve as a 'recall' and issue refunds to THEIR loyal customers, so they call us, loyal customers, not sure how much longer I will be a 'loyal' Toyota customer. I addressed this matter with Toyota Motor Sales U.S.A. Inc. and the dealership I purchased my 2020 RAV4, Milton Martin Toyota of Gainesville, GA. They just blew it off. So, I went to another Toyota dealership to have the repair done.

NHTSA ID Number: 11553584
Incident Date November 4, 2023
Complaint Date November 4, 2023
Vehicle Identification Number 2T3P1RFV3LC****

Summary of Complaint

At 68,000 miles my Toyota Rav4 needs to have coolant bypass valve replaced. My understanding is this is getting to be a common problem and would like to see it placed on a RECALL. Thank You.

NHTSA ID Number: 11554989
Incident Date November 3, 2023
Complaint Date November 14, 2023
Vehicle Identification Number 2T3H1RFV5LW****

Summary of Complaint

engine coolant bypass valve short to battery

NHTSA ID Number: 11554983
Incident Date November 12, 2023
Complaint Date November 14, 2023
Vehicle Identification Number 2T3W1RFV7LW****

Summary of Complaint

Engine maintenance required signed popped on and wouldn't go away. Took it to the dealership. They say it's a common coolant bypass valve. Was charged a hefty amount of nearly \$700

NHTSA ID Number: 11555738
Incident Date November 15, 2023
Complaint Date November 17, 2023
Vehicle Identification Number 2T3J1RFV9KC****

Summary of Complaint

My car ran a message of " Maintenance engine required" and it turns out the COOLANT BYPASS VALVE has gone bad. When turning the AC on the message appears, but went off the message doesn't appear.

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1 **NHTSA ID Number:** 11555878
 2 **Incident Date** July 13, 2023
 3 **Complaint Date** November 19, 2023
 4 **Vehicle Identification Number** 2T3W1RFV1KW****
 5 **Summary of Complaint**

In my Rav4, I had a message pop up that said "Engine Maintenance Required" and it wouldn't go away. I couldn't get rid of it. So I took it to the dealership and they immediately said that I needed my engine coolant bypass valve replaced. They also said it has been a constant issue with other Rav4 vehicles, but there has not been a recall yet. So I paid \$650 to get the valve replaced and the continuous message taken off.

6 **NHTSA ID Number:** 11556307
 7 **Incident Date** November 1, 2023
 8 **Complaint Date** November 21, 2023
 9 **Vehicle Identification Number** 2T3H1RFV1KW****
 10 **Summary of Complaint**

Coolant bypass valve failure - risk of engine overheating

11 **NHTSA ID Number:** 11556456
 12 **Incident Date** November 21, 2023
 13 **Complaint Date** November 22, 2023
 14 **Vehicle Identification Number** 2T3K1RFV3LC****
 15 **Summary of Complaint**

My coolant bypass valve in the engine malfunctioned and shorted at a mere 27,300 miles on the vehicle and I had to bring it into the dealership to be replaced. A coolant bypass valve failing or malfunctioning can cause the engine to overheat, catch fire, or cause complete seizure. Can also cause the vehicle to stall and possibly cause a crash or wreck. Toyota has acknowledged the problem in the RAV4's but no recalls have been issued. Dealer knew exactly what the problem was when I mentioned that the 'engine maintenance required' light came up on my dashboard BEFORE mechanic diagnosed it and confirmed which tells me they are aware of the issue in these cars.

16 **NHTSA ID Number:** 11557699
 17 **Incident Date** November 30, 2023
 18 **Complaint Date** November 30, 2023
 19 **Vehicle Identification Number** 2T3H1RFV7LC****
 20 **Summary of Complaint**

Coolant bypass valve less than 40k miles and there is hundreds of them going bad this needs to be a recall issue

21 **NHTSA ID Number:** 11558972
 22 **Incident Date** November 29, 2023
 23 **Complaint Date** December 7, 2023
 24 **Vehicle Identification Number** 2T3H1RFV0LW****
 25 **Summary of Complaint**

Coolant bypass valve failed vehicle warning lights came on for this 2020 Toyota Rav4 at 31,641 miles. This is absolutely available for inspection on request. Safety as this can potentially cause overheating, coolant leaking, a cracked cylinder. The manufacturer (Local Toyota dealership - "Ed Morse Delray Toyota" inspected and suggested replacement of the coolant bypass valve for this 2020 toyota rav4 for a price around 800\$. the technician say they see a load of these newer model Rav4's needing new coolant bypass valves. I opted not to immediately replace the valve due to it being a vehicle model-wide issue that should likely be a recall. These appeared the day before I brought it in to the dealer so withing 5-10 miles of the 31,641 miles for this 2020 Toyota Rav4. Warning just says "error please take in to dealership for service".

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NHTSA ID Number: 11560982
Incident Date August 14, 2023
Complaint Date December 19, 2023
Vehicle Identification Number 2T3W1RFV4LC****

Summary of Complaint

2020 RAV4 with 47,589 miles. The engine maintenance light came on. It turns off once I shut off the vehicle and start it up again. It only comes back on when I put the air conditioner or heater on. I was told it's the heater control valve/coolant bypass valve and would cost around \$900+ to repair. I did some research and see that this problem is occurring alot.

NHTSA ID Number: 11563563
Incident Date January 4, 2024
Complaint Date January 4, 2024
Vehicle Identification Number 2T3H1RFV1LC****

Summary of Complaint

Vehicle displayed Engine Maintenance Required light at 54,000 miles. As issue was described from dealer, "Engine code was P268115 for an engine coolant bypass valve circuit short to battery or open. Found Coolant valve intermittently sticking." Was told by technician that if the part was not replaced, the issue could lead to engine overheating and that after they made the fix, they were going to check to see if a gasket was possible blown from the issue resulting from overheating that may have gone overlooked.

NHTSA ID Number: 11567111
Incident Date April 17, 2023
Complaint Date January 22, 2024
Vehicle Identification Number 2T3A1RFV0LW****

Summary of Complaint

The engine coolant bypass valve was faulty. The car would not start so I was left stranded 15 miles from home and had to have car towed to Toyota dealer. The problem was confirmed by dealer and they were aware that it was a known issue. The vehicle was inspected by multiple Toyota dealerships. My vehicle displayed an engine maintenance light. The dealerships found the code P268115: Engine Coolant Bypass Valve Circuit short to battery or open

NHTSA ID Number: 11569659
Incident Date February 1, 2024
Complaint Date February 3, 2024
Vehicle Identification Number 2T3P1RFV3LC****

Summary of Complaint

Engine coolant bypass valve failure @40k miles. Could cause engine to overheat possibly be stranded.

NHTSA ID Number: 11570993
Incident Date February 5, 2024
Complaint Date February 9, 2024
Vehicle Identification Number 2T3G1RFVXKW****

Summary of Complaint

Coolant bypass valve is faulty. Everyone is having this issue, please please recall!

NHTSA ID Number: 11571702
Incident Date February 13, 2024
Complaint Date February 13, 2024
Vehicle Identification Number 2T3J1RFV2KC****

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Summary of Complaint

Engine cooling issues can cause the engine to overheat and cause a vehicle stall. The vehicle displays "Engine Maintenance Required Visit Your Dealer" when the AC is turned on, and has been confirmed by Arlington Toyota (Jacksonville, FL) dealer as a known issue to the coolant bypass valve with potential safety risks at 2:22pm Eastern on [XXX]. The service department stated that this is common, and the valve is either stuck open or closed, and should be replaced as soon as possible to avoid failure. INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11571873
Incident Date February 14, 2024
Complaint Date February 14, 2024
Vehicle Identification Number 2T3N1RFVXKW****

Summary of Complaint

Coolant bypass valve

NHTSA ID Number: 11572428
Incident Date February 15, 2024
Complaint Date February 16, 2024
Vehicle Identification Number 2T3H1RFV1LW****

Summary of Complaint

* Coolant Bypass Valve * This problem costs \$800 to fix at the Toyota Dealership. *My car is a 2020 Rav4 with only 32k miles on it. * After reading thousands of complaints on websites from other 2020 Rav4 owners with the exact same problem, I think there should be a recall as this can be a dangerous issue if the engine overheats. I am shocked that nothing has been done about this yet. *The only warning was a routine maintenance light that comes on every 5,000 miles.

NHTSA ID Number: 11572736
Incident Date February 5, 2024
Complaint Date February 19, 2024
Vehicle Identification Number 2T3W1RFV2LW****

Summary of Complaint

The coolant bypass valve failed on my RAV4 at 67,757 miles. There are multiple similar complaints online and I would like to bring it to the attention to the NHTSA. The engine service light cut on and the dealership replaced the valve to make it go away.

NHTSA ID Number: 11573392
Incident Date February 17, 2024
Complaint Date February 22, 2024
Vehicle Identification Number 2T3K1RFV9LC****

Summary of Complaint

There seems to be a lot of folks online wanting a resolution from Toyota regarding a Coolant Bypass Valve that fails around 30k-60k miles on their 2020 Toyota Rav4's and other models. My Rav 4 just recently had the Engine Maintenance Required pop up on mine & I'm between 30k-40k. Some people had their issue a couple years ago and still nothing has been done about it. Toyota is charging close to \$1000 for total repairs with labor for most of these instances. The community wants & needs a recall.

NHTSA ID Number: 11574112
Incident Date February 26, 2024
Complaint Date February 26, 2024
Vehicle Identification Number 2T3H1RFV6KC****

Summary of Complaint

1 "ENGINE MAINTENANCE REQUIRED, VISIT YOUR DEALER" Message came
 2 up on dash display. Took it to the dealership for diagnostic inspection. They informed
 3 me that the coolant bypass valve needed to be replaced. After much research, I found
 4 that this is a common occurrence on newer model Rav 4s. If the component is not
 5 replaced, I was informed that it could cause overheating and other engine problems.
 6 Price to replace plus diagnostic check is around \$650. I have read other complaints
 7 about this same issue on the NHTSA website. Will there be a recall issued on this
 8 component?

9 **NHTSA ID Number:** 11574107

10 **Incident Date** February 24, 2024

11 **Complaint Date** February 26, 2024

12 **Vehicle Identification Number** 2T3Y1RFV8KC****

13 **Summary of Complaint**

14 Engine maintenance light turned on. Found out the engine coolant bypass valve needed
 15 to be replaced. Many other reported cases for make and model of this car.

16 **NHTSA ID Number:** 11575073

17 **Incident Date** February 22, 2024

18 **Complaint Date** February 28, 2024

19 **Vehicle Identification Number** 2T3W1RFV9LW****

20 **Summary of Complaint**

21 Coolant bypass valve on all newer 2019 and up Rav4 models are known to cause issues
 22 or break at early mileage usually before 50k miles. It's a known problem with Rav4
 23 owners and is backed by many claims on social media websites and internet forums.
 24 The cost for diagnostic of "engine maintenance required" message on cars dash can
 25 range up to \$150 and up for diagnostic fees only at Toyota Dealerships. Other
 26 independent mechanics cannot diagnose the problem message. Repair and replacement
 27 of \$800 for parts and labor is ridiculous.

28 **NHTSA ID Number:** 11575073

Incident Date March 2, 2024

Complaint Date March 2, 2024

Vehicle Identification Number 2T3H1RFV5KW****

Summary of Complaint

"Engine Maintenance Required" message appears on dashboard for this model car is
 most likely need to replace coolant bypass valve. When researching what could be the
 problem, people of social media, car forums, etc. were all experiencing the same issue
 with the car. Coolant leaking in the engine can cause a combustion, overheating or stall
 in vehicle.

NHTSA ID Number: 11575297

Incident Date February 19, 2024

Complaint Date March 4, 2024

Vehicle Identification Number 2T3W1RFV3KW****

Summary of Complaint

The contact owns a 2019 Toyota Rav4. The contact stated while driving approximately
 65 MPH, the "Engine Maintenance Required Please See Dealer" message was
 displayed. The contact stated that the vehicle was driving normally, however the
 message was intermittent. The contact had taken the vehicle to a local dealer, where it
 was diagnosed and determined that the coolant bypass valve needed to be replaced. The
 dealer advised the contact that the failure was associated to DTC code: P26815; and
 that coolant was leaking into the engine. The vehicle was repaired. The manufacturer
 was not informed of the failure. The failure mileage was approximately 47,800.

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NHTSA ID Number: 11575924
Incident Date September 30, 2023
Complaint Date March 7, 2024
Vehicle Identification Number 2T3W1RFV9LW****

Summary of Complaint

p/a engine coolant bypass valve and coolant, and connector with pigtail, pins are full of corrosion inside connector. Items need to be replaced

NHTSA ID Number: 11577063
Incident Date March 12, 2024
Complaint Date March 13, 2024
Vehicle Identification Number 2T3W1RFV5LW****

Summary of Complaint

The engine coolant bypass valve has shorted and needs to be replaced. The dealer has confirmed the issue. First noticed when a message on the dash that said to see the dealer for an engine issue

NHTSA ID Number: 11577294
Incident Date February 4, 2022
Complaint Date March 14, 2024
Vehicle Identification Number 2T3W1RFV5LC****

Summary of Complaint

This is a known issue. Coolant Bypass Valve Issue Error on value says "Engine Maintenance Required, Visit Your Dealer." We have been waiting on the recall at 27,000 miles (brand new purchased). We are at 50,000 miles now and still no resolution and the error stays.

NHTSA ID Number: 11577490
Incident Date March 14, 2024
Complaint Date March 14, 2024
Vehicle Identification Number 2T3J1RFV9KC****

Summary of Complaint

Coolant Bypass Valve went out. Causes the car to overheat if coolant leaks from the valve. HVAC system will not properly work if valve is bad. This is a common problem and should be addressed.

NHTSA ID Number: 11577366
Incident Date February 27, 2024
Complaint Date March 14, 2024
Vehicle Identification Number 2T3W1RFV0LC****

Summary of Complaint

Check engine warning came on, dealer immediately knew it was coolant bypass valve since this is a very common incident with Rav4s recently. My valve was defective and leaking coolant so I had to get it replaced.

NHTSA ID Number: 11578276
Incident Date March 18, 2024
Complaint Date March 18, 2024
Vehicle Identification Number 2T3C1RFV4LW****

Summary of Complaint

I have 48,000 miles on my 2020 Toyota RAV4 XLE Premium, received an Engine warning system light on vehicle, I took the vehicle to my local Toyota dealer in Gastonia, NC, to be told it was a faulty coolant bypass valve. I have noticed online that this has been a reoccurring problem with 2019-2020 RAV4. They quoted me a price of

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1 \$619.00 to fix. With my car being newer and only having 48,000 miles, I feel this is a
2 fault of Toyota, not mine. Faulty equipment failure on their part.

3 **NHTSA ID Number:** 11578276
4 **Incident Date** March 16, 2024
5 **Complaint Date** March 19, 2024
6 **Vehicle Identification Number** 2T3J1RFV3KC****

7 **Summary of Complaint**
8 On [XXX], I brought my car in for its 60,000 mile check up. Everything was marked
9 in the green zone including the “coolant.” On [XXX], car brought back in due to
10 message on the car stating “Engine Service Required.” I went to the dealer and the
11 advisor Daniel already had an idea it was the coolant bypass valve was most likely
12 leaking coolant. Per advisor, he stated he has seen this many times before for these
13 types of car bought within this year always has this problem. Upon inspection, the
14 advisor was correct and it was the coolant bypass valve leaking coolant and needing to
15 be repaired. I had to pay \$1,278.55 just to fix this in a low mileage car. INFORMATION
16 REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA),
17 5 U.S.C. 552(B)(6)

18 **NHTSA ID Number:** 11578493
19 **Incident Date** March 19, 2024
20 **Complaint Date** March 20, 2024
21 **Vehicle Identification Number** 2T3W1RFVXLW****

22 **Summary of Complaint**
23 I kept getting an engine maintenance message. The coolant bypass assembly failed.

24 **NHTSA ID Number:** 11579370
25 **Incident Date** March 25, 2024
26 **Complaint Date** March 25, 2024
27 **Vehicle Identification Number** 2T3K1RFV9LW****

28 **Summary of Complaint**
Engine maintenance required, visit your dealer. There are a lot of Toyota owners with
this issue and they said it is the coolant bypass valve. Toyota needs to fix/recall this
issue. They want to charge us 700 dlls but it should be free.

NHTSA ID Number: 11579598
Incident Date March 26, 2024
Complaint Date March 26, 2024
Vehicle Identification Number 2T3F1RFV0KC****

Summary of Complaint
Engine Maintenance Required Alert popped up on my vehicle. It’s a 2019 RAV4 with
barely 60k mileage on it that I bought new off the dealership back in 2019. They are
charging me \$800 to get the coolant bypass valve repaired, but this is a known issue
that all RAV4’s are experiencing (regardless if it’s at 20k or 100k miles)

NHTSA ID Number: 11579922
Incident Date October 18, 2023
Complaint Date March 28, 2024
Vehicle Identification Number JTMH1RFV6KD****

Summary of Complaint
The engine maintenance required turned on at 55k miles for the coolant bypass. After
trying to get it repaired they had 500 on back order. Thousands of Rav 4’s are
experiencing this with over \$800 quote to repair , this cannot just be a basic issue this
is bigger.

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NHTSA ID Number: 11580299
Incident Date March 23, 2024
Complaint Date March 31, 2024
Vehicle Identification Number 2T3W1RFV6MC****
Summary of Complaint
Coolant Bypass Valve failed.

NHTSA ID Number: 11580710
Incident Date April 2, 2024
Complaint Date April 2, 2024
Vehicle Identification Number 2T3C1RFV8LC****
Summary of Complaint

“Engine maintenance required visit your dealer” appeared on screen. After searching for similar issues. The coolant bypass valve has malfunctioned or failed. The fact that hundreds if not thousands of others have had this issue and it has not yet been recalled coupled with the fact that this isn’t covered under powertrain warranty is just crazy. Considering when reporting this issue I had to select powertrain that showed coolant / hoses under the menu baffles me even more that it wouldn’t even be considered covered under warranty. There needs to be a recall. \$700+ to replace a sub \$100 hose and sensor that has nothing to do with normal wear and tear.

NHTSA ID Number: 11581168
Incident Date March 11, 2024
Complaint Date April 4, 2024
Vehicle Identification Number 2T3W1RFV0KW****
Summary of Complaint

Coolant Bypass Valve leaking onto electrical systems. If not fixed, electrical system will fail. Toyota is aware that it's a common problem.

NHTSA ID Number: 11581625
Incident Date April 7, 2024
Complaint Date April 7, 2024
Vehicle Identification Number 2T3P1RFV7KC****
Summary of Complaint

Engine maintenance required message. The issue is the coolant bypass valve. I’ve seen hundreds of others complain about the same issue.

NHTSA ID Number: 11581581
Incident Date July 14, 2023
Complaint Date April 7, 2024
Vehicle Identification Number 2T3Y1RFV0KC****
Summary of Complaint

2019 RAV4 with persistent check engine light. Dealership states it is a faulty coolant bypass valve. Valve is not leaking, it appears to be an issue with the part.

NHTSA ID Number: 11582691
Incident Date April 1, 2024
Complaint Date April 12, 2024
Vehicle Identification Number 2T3G1RFV0KC****
Summary of Complaint

Faulty Coolant Bypass Valve. Toyota dealership told me it is the 20th one this week.

NHTSA ID Number: 11582858
Incident Date January 1, 2024
Complaint Date April 14, 2024

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1 **Vehicle Identification Number** 2T3W1RFV8KW****

Summary of Complaint

2 The coolant bypass vavle is going bad and needs to be replaced. If it goes bad then it
3 could cause significant damage to my engine. The car Toyota car dealership stated that
it is an a common issue with this year, make, and model.

4 **NHTSA ID Number:** 11583103

Incident Date March 1, 2024

5 **Complaint Date** April 15, 2024

Vehicle Identification Number 2T3H1RFV1KW****

6 **Summary of Complaint**

7 -Engine maintenance required light is in and will not clear when the AC unit is running.
8 -The engine coolant bypass valve is the problem. -Not sure if it affects safety if it were
9 to fail. -This has been confirmed with independent service center.

10 **NHTSA ID Number:** 11583530

Incident Date April 15, 2024

11 **Complaint Date** April 17, 2024

Vehicle Identification Number 2T3J1RFV2KC****

12 **Summary of Complaint**

13 "maintenance required visit your dealer" message came on at ~84k miles, continued to
14 come on intermittently thereafter despite resetting maintenance reminder. Checked
error codes and discovered issue was a faulty coolant bypass valve. Upon researching
this issue, learned that numerous Toyota owners have experienced the same issue on
various years/models and that dealership service centers are well aware of the problem.
Despite this, Toyota has not issued any TSBs, or offered to compensate customers for
replacement of this obviously defective part.

15 **NHTSA ID Number:** 11583719

Incident Date April 15, 2024

16 **Complaint Date** April 17, 2024

Vehicle Identification Number 2T3P1RFV6LC****

17 **Summary of Complaint**

18 Coolant bypass sensor is faulty.

19 **NHTSA ID Number:** 11583579

Incident Date March 3, 2024

20 **Complaint Date** April 17, 2024

Vehicle Identification Number 2T3F1RFV9LC****

21 **Summary of Complaint**

22 1. The coolant bypass valve failed. I had to pay about \$950 to get it fixed because it is
23 a safety issue and was not covered under any warranties. 2. Yes they were. The coolant
bypass valve is responsible for maintaining optimal engine temperature. With this part
broken it, the engine can overheat as the coolant will not circulate through the radiator.
24 3. Yes. The toyota dealership informed us they see an unreal amount of people with
faulty coolant bypass valves. It is an issue with the part. 4. It was inspected by the
Toyota dealership in Round Rock. 5. No there was nothing to indicate an issue. I only
25 discovered the problem because I got a "engine maintenance required" warning on my
dash.

26 **NHTSA ID Number:** 11583838

Incident Date April 18, 2024

27 **Complaint Date** April 18, 2024

Vehicle Identification Number 2T3C1RFVXKW****

28 **Summary of Complaint**

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1 Received the message on my 2019 Toyota Rav 4: ENGINE MAINTENANCE
 2 REQUIRED. VISIT YOUR DEALER. Diagnostic: Coolant Bypass Valve
 3 REPLACEMENT needed. Factory warranty does not cover. After researching this issue
 4 I am shocked that there has not been a recall placed for this, there are hundreds of
 5 threads with people experiencing this same issue with their Toyota RAV4. This is over
 6 a \$800 repair that should be covered by the manufacturer as it is an obvious equipment
 7 malfunction due to the manufacture with the overwhelming number of others having
 8 this same issue.

9 **NHTSA ID Number:** 11583800
 10 **Incident Date** April 18, 2024
 11 **Complaint Date** April 18, 2024
 12 **Vehicle Identification Number** 2T3F1RFV5LW****
 13 **Summary of Complaint**
 14 Coolant bypass valve.

15 **NHTSA ID Number:** 11584419
 16 **Incident Date** April 1, 2024
 17 **Complaint Date** April 22, 2024
 18 **Vehicle Identification Number** 2T3W1RFV7LC****
 19 **Summary of Complaint**
 20 Coolant bypass valve error.

21 **NHTSA ID Number:** 11584647
 22 **Incident Date** April 23, 2024
 23 **Complaint Date** April 23, 2024
 24 **Vehicle Identification Number** 2T3P1RFV8KC****
 25 **Summary of Complaint**

26 I have a message saying “ Engine maintenance required” that will not clear off of my
 27 car. People at my local dealership acted like it was just the normal maintenance
 28 message, but it’s not. After doing some research looks like other Toyotas the same year
 as mine are having the same issue and it’s a coolant bypass valve leak, I don’t see where
 this is a recall yet but I’m seeing millions of other people having the same issue. I see
 where there is an engine recall on 2019 but when I put my Vin number in it said mine
 wasn’t one of those. , I don’t see where this is a recall yet but I’m seeing millions of
 other people having the same issue. I see where there is an engine recall on 2019 but
 when I put my Vin number in it said mine wasn’t one of those but I’m having that issue.

29 **NHTSA ID Number:** 11584806
 30 **Incident Date** April 23, 2024
 31 **Complaint Date** April 23, 2024
 32 **Vehicle Identification Number** 2T3W1RFV3LC****
 33 **Summary of Complaint**
 34 Coolant bypass valve.

35 **NHTSA ID Number:** 11584960
 36 **Incident Date** April 1, 2024
 37 **Complaint Date** April 24, 2024
 38 **Vehicle Identification Number** 2T3W1RFV8LW****
 39 **Summary of Complaint**

40 My name is [XXX] and I would like to file a complaint against Toyota. I purchased my
 41 RAV4 XLE in 2020 after returning home from military training. This was my dream
 42 car and I was filled with joy to be able to purchase it. In the four years I have had it, I
 43 have had minimal issues, nothing to note other than normal wear and tear, until recently.
 44 The "Engine Maintenance Required" light came on roughly 3 weeks ago. I deemed it

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1 to be my oil change notification and reset it knowing when my next oil change was due.
 2 The notification came back on to which I started investigating further. I typed in "2020
 3 RAV4 Engine Maintenance Required" into Google and was surprised at how many car
 4 forums and complaints popped up for this exact problem. It was an astronomical
 5 number of complaints made by loyal Toyota owners. I scrolled for an hour reading
 6 everyone's story, which was almost identical to mine. I made an appointment at my
 7 nearest Toyota in Bountiful, UT to get a diagnostic test done. Not to my surprise, the
 8 code that was tripping the system was for the 'coolant bypass valve.' I was quoted \$660
 9 for the parts and labor. After getting a price breakdown and verbally stating how
 10 frustrated I was with this issue due to how many others online had the same issue and
 11 there not being a recall, I felt like my only option was to pay it and suppress my anger.
 12 I am not upset with the Toyota dealership I went to. I am upset that this is a very known
 13 issue that even the mechanic verbally stated knowing about, and that Toyota as a large
 14 corporation is not doing right by the people who swear by owning Toyota's and their
 15 reputable reputation. I called two private mechanics about the issue and they both stated
 16 that they have worked on several RAV4's with this issue. It is not cosmetic, it is a critical
 17 issue that needs to be fixed. I hope this complaint makes it to the right hands and a
 18 solution is implemented so people can enjoy their car without these worries. Thank you.
 19 INFORMATION REDACTED PURSUANT TO THE FREEDOM OF
 20 INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

21 **NHTSA ID Number:** 11584942
 22 **Incident Date** April 23, 2024
 23 **Complaint Date** April 24, 2024
 24 **Vehicle Identification Number** 2T3P1RFV4KC****
 25 **Summary of Complaint**
 26 Coolant bypass valve code P268115.

27 **NHTSA ID Number:** 11585965
 28 **Incident Date** April 25, 2024
 29 **Complaint Date** April 29, 2024
 30 **Vehicle Identification Number** 2T3D6RFV8MW****
 31 **Summary of Complaint**

32 Engine maintenance light came on saying to go to dealer at 35,000 miles. The coolant
 33 bypass valve needs to be replaced in order to prevent the engine from overheating. Our
 34 repair shop coordinated with the dealership who admitted that they commonly see this
 35 issue on RAV4 and Corolla models, though there is no recall currently in place.

36 **NHTSA ID Number:** 11585966
 37 **Incident Date** April 29, 2024
 38 **Complaint Date** April 29, 2024
 39 **Vehicle Identification Number** 2T3C1RFV7LW****
 40 **Summary of Complaint**

41 Coolant bypass valve failure 1000\$ to replace on a vehicle that's only a few years old
 42 Toyota refuses to fix it.

43 **NHTSA ID Number:** 11586081
 44 **Incident Date** April 1, 2024
 45 **Complaint Date** April 30, 2024
 46 **Vehicle Identification Number** 2T3W1RFV8LC****
 47 **Summary of Complaint**

48 Engine maintenance required. Found that coolant bypass valve has malfunctioned.
 49 Warranty will not cover due to being over 30k miles.

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1 **NHTSA ID Number:** 11586169
 2 **Incident Date** April 24, 2024
 3 **Complaint Date** April 30, 2024
 4 **Vehicle Identification Number** 2T3P1RFVXLW****

5 **Summary of Complaint**

6 Coolant bypass valve is faulty, coolant leaks into sensor. Coolant regulation is
 7 important for maintaining proper engine temperature and failure with this system can
 8 lead to larger engine issues, possibly leading to catastrophic engine failure. Problem
 9 verified by independent mechanic and dealer. Issue was inspected by dealer. The
 10 message "Engine Maintenance Required // Visit Your Dealer" displays on dash.

11 **NHTSA ID Number:** 11586570
 12 **Incident Date** May 1, 2024
 13 **Complaint Date** May 2, 2024
 14 **Vehicle Identification Number** 2T3P1RFV5LC****

15 **Summary of Complaint**

16 My 2020 Toyota Rav4 was just diagnosed with an engine coolant bypass valve failure.
 17 The leak from this valve could cause engine overheating. This seems to be a well known
 18 defective engine component that Toyota appears unwilling to address.

19 **NHTSA ID Number:** 11586618
 20 **Incident Date** April 22, 2024
 21 **Complaint Date** May 2, 2024
 22 **Vehicle Identification Number** 2T3W1RFV9KW****

23 **Summary of Complaint**

24 The engine maintenance light came on at 82,300 miles. After running diagnostics, I was
 25 told at the Toyota dealership that it was the coolant bypass valve assembly. Toyota
 26 stated that this was a very common problem in this year model RAV4. The fix was
 27 almost \$1000.

28 **NHTSA ID Number:** 11586887
Incident Date May 2, 2024
Complaint Date May 3, 2024
Vehicle Identification Number 2T3A1RFV1LC****

Summary of Complaint

Coolant bypass valve

NHTSA ID Number: 11587072
Incident Date April 24, 2024
Complaint Date May 5, 2024
Vehicle Identification Number 2T3C1RFV9LC****

Summary of Complaint

I just bought my 2020 RAV4 in November with the lifetime powertrain warranty. By
 April, I had a "Engine Maintenance Required" light that would not go away. I took it
 to the dealership and it was my coolant bypass valve. \$800 later, it's fixed. Not covered
 under any warranty. Very common issue that Toyota charges a lot to fix.

NHTSA ID Number: 11587337
Incident Date March 1, 2024
Complaint Date May 6, 2024
Vehicle Identification Number 2T3G1RFV0KC****

Summary of Complaint

#16260-F0010 B/O PART COOLANT BY-PASS LOST Vehicle is a 2019 RAV4,
 odometer reads 37849. I've had a persistent "Engine Maintenance Required"
 notification on the MID screen for the last 1500 miles or so, literally the day after

1 getting a scheduled service at the dealer. I initially thought it was just the service
 2 reminder, so I didn't think much of it, and just ignored it. But eventually it became so
 3 annoying that I tried to clear the notification, and couldn't-- and upon further research,
 4 it turns out the notification is probably the result of a leaking coolant bypass valve. I
 haven't noticed any loss in coolant, haven't experienced any abnormal engine temps,
 and haven't had any CELs. I've also noticed that the notification only comes on now
 when I have the A/C turned on.

5 **NHTSA ID Number:** 11587135
 6 **Incident Date** May 6, 2024
 7 **Complaint Date** May 6, 2024
 8 **Vehicle Identification Number** 2T3H1RFV9KC****
 9 **Summary of Complaint**

10 Engine coolant bypass valve failure when the vehicle was very new. Message "engine
 11 maintenance required" showing on screen, unable to bypass message. Nearly \$1000 to
 12 fix, which is not something I am capable of doing.

13 **NHTSA ID Number:** 11587226
 14 **Incident Date** May 6, 2024
 15 **Complaint Date** May 6, 2024
 16 **Vehicle Identification Number** 2T3C1RFV2KC****
 17 **Summary of Complaint**

18 The vehicles "Engine Maintenance Required. Visit your Dealer" notice appeared on the
 19 dashboard screen. Changed the oil, reset the scheduled maintenance button, ran
 20 diagnostics from The Auto Store, and it still appeared. The Toyota Dealership ran their
 21 own diagnostic and said it was due to P268115 set for failed coolant bypass valve.

22 **NHTSA ID Number:** 11587424
 23 **Incident Date** May 1, 2024
 24 **Complaint Date** May 7, 2024
 25 **Vehicle Identification Number** 2T3H1RFV8LC****
 26 **Summary of Complaint**

27 2020 rav4 coolant bypass valve problem. This is an issue that is been happening in the
 28 2019 and 2020 models even with less than 55,000 miles on it. My vehicle milage is
 52,000 and now I'm having this problem and the dealer is charging \$700.00 to fix the
 issue. I thought that Toyota vehicles were reliable but this is ridiculous.

NHTSA ID Number: 11587648
Incident Date May 8, 2024
Complaint Date May 8, 2024
Vehicle Identification Number 2T3J1RFV5LC****
Summary of Complaint

"Engine Maintenance Required" appeared on the screen and immediately took the
 vehicle to my local dealership. Dealer claims "Engine coolant bypass valve" Has
 malfunctioned and needs to be replaced. They are charging \$697.54 for the repair. After
 a little research online including nhtsa.gov this seems to be an extremely common issue
 and needs to be recalled.

NHTSA ID Number: 11587884
Incident Date April 25, 2024
Complaint Date May 9, 2024
Vehicle Identification Number 2T3F1RFV8KW****
Summary of Complaint

ENGINE COOLANT BYPASS VALVE CIRCUIT

NHTSA ID Number: 11588156
Incident Date May 9, 2024
Complaint Date May 10, 2024
Vehicle Identification Number 2T3A1RFV7LW****

Summary of Complaint

The contact owns a 2020 Toyota Rav4. The contact stated that the "Engine Maintenance Required Visit Your Dealer" message was displayed. The vehicle was taken to a dealer where a diagnostic was performed. The contact was informed that coolant bypass valve was defective and needed to be replaced. The manufacturer was notified of the failure; the contact was informed that there were no recalls on the vehicle. The vehicle was repaired. The failure mileage was 26,643.

NHTSA ID Number: 11588353
Incident Date November 6, 2023
Complaint Date May 12, 2024
Vehicle Identification Number JTMA1RFV7KD****

Summary of Complaint

I bought this car last year on October 4th from carmax (mileage was 62k at the time of purchase). I started to have problems the next month on November 6th with the brakes which was rusted and had to replace the pads. That was very dangerous and could have hurt myself driving around the heavy rain at the time. I was scared for my safety and others wellbeing so I took the car to the dealership. Their mechanic checked the car and told me that this wasn't fixed or checked since April 2023 before I bought the car in october 2023. I had problems with the infotainment system. the map navigation for my android and iPhone doesnt work anymore. the mechanic at the dealership fixed the rear break pads and discs but couldnt fix the infotainment system even after updating the system. He issued me a 250 dollar refund and was charged 680 dollars for the rest of the job. Another issue happened on March 2024 for the front barring needed to be replaced from a carmax mechanic shop. Paid 380 to fix. This month I got a message saying " engine maintenance required, go to dealership". I took the car to the mechanic and explained that the computer code error message means the coolant valve is defective. I'm thinking of going to the dealer tomorrow up until I found out the car never got the recall repaired from this website. Could this be the reason why I'm having this may problems? The car hasn't been inspected by police or insurance, only the toyota manufacturer on November 6th who told me about the car not getting fixed since April 2023. I have the invoice of all these repairs done. The latest mechanic that told me about the coolant valve being defective thought I needed to change my oil. He did change the oil and charged me 189 dollars. I'm planning on taking the mechanic to fix that problem since the toyota dealership was gonna charge me to fix the transmission fluid which isn't the problem. I will upload the receipt for the oil change job.

NHTSA ID Number: 11588644
Incident Date May 13, 2024
Complaint Date May 14, 2024
Vehicle Identification Number 2T3A1RFV5KC****

Summary of Complaint

"Engine Maintenance Required" appeared on the screen. After an internet search I took the vehicle to Passport Toyota in Marlow Heights, MD. Dealer claims "Engine coolant bypass valve" needs to be replaced. They charged me \$681.72 for the repair. After a little research online including nhtsa.gov this seems to be an extremely common issue and needs to be recalled.

NHTSA ID Number: 11588638
Incident Date May 10, 2024

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Complaint Date May 14, 2024
Vehicle Identification Number 2T3C1RFV4KW****

Summary of Complaint
my 2019 Rav4 has a message "to visit the dealer" vehicle needs maintance. i believe code #P2681. The coolant bypass valve. the dealer told me that the coolant bypass valve needs to be replaced. Also through my research this is a know issue with certain Toyota vehicles including the Rav 4. Deal needs approx \$1,000 to replace the coolant bypass value. My personal mechanic researched the known issue and wants me to purchase the parts from Toyota #16260-f0010. \$119.68 from toyota online parts. I am not sure what to do. No recall "YET" and vehicle not in warranty.

NHTSA ID Number: 11588981
Incident Date May 12, 2024
Complaint Date May 15, 2024
Vehicle Identification Number 2T3W1RFV7LW****

Summary of Complaint
engine maintenance required light, after much research it shows it is a common defect in 2019-2022 models. Coolant Bypass Valve malfunction or failure. This can lead to overheating/fire. Appeared at 70k, all maintenance done by certified toyota dealership

NHTSA ID Number: 11588958
Incident Date May 10, 2024
Complaint Date May 15, 2024
Consumer Location SOMERSET, MA
Vehicle Identification Number 2T3F1RFV7LC****

Summary of Complaint
Engine maintenance light comes on this is not the maintenance light this morning light is not in the owner's manual I had to Google the problem to find out the answer it is a faulty coolant bypass valve my car has 47,000 miles other people have reported the same issue Toyota won't acknowledge and won't fix the problem there are complaints from many other people about this

NHTSA ID Number: 11589151
Incident Date May 16, 2024
Complaint Date May 16, 2024
Vehicle Identification Number 2T3A1RFV0KW****

Summary of Complaint
At 73,000 miles the "engine maintenance required" warning light came on indicating the coolant bypass valve is damaged or has failed. A quick google search will show this is an extremely common issue and a result of using inferior quality parts in manufacturing. Toyota should recall this issue asap as many people have had the same problem.

NHTSA ID Number: 11589007
Incident Date May 15, 2024
Complaint Date May 16, 2024
Vehicle Identification Number 2T3C1RFV2KC****

Summary of Complaint
Coolant Bypass Valve failure with only 27000 miles

NHTSA ID Number: 11589749
Incident Date May 18, 2024
Complaint Date May 20, 2024
Vehicle Identification Number JTMN1RFV9KD****

Summary of Complaint

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1 A warning notice displayed on my vehicle indicating that "engine maintenance
 2 required" "visit your dealer". The warning message will not clear from the display. A
 3 certified auto mechanic downloaded the code which indicated that the issue was a
 4 failed Coolant Bypass Valve. This part is a known and frequent issue with Toyota's
 5 and there is such a high demand for this part that it is on backorder nationwide. The
 6 earliest that this part is available may be July or later. TSB #TTT069922 has been
 7 issued regarding this prevalent issue. This problem directly impacts air conditioning
 8 performance. Due to the long wait for the part, air conditioning will not cool to the
 9 level needed for the long hot summer ahead. Toyota should consider issuing a recall
 10 for this problem.

11 **NHTSA ID Number:** 11590076
 12 **Incident Date** May 21, 2024
 13 **Complaint Date** May 22, 204
 14 **Vehicle Identification Number** 2T3H1RFV0KW****

15 **Summary of Complaint**
 16 Engine maintenance required warning notice came on. Researched showed this to be a
 17 failure of the coolant bypass valve. It is a well known and documented problem with
 18 can lead to the engine overheating and seizing. Called dealership and they were well
 19 aware of issue and wanted \$1,100. to repair. My car only has 46K miles on it. Toyota
 20 should issue a recall.

21 **NHTSA ID Number:** 11590051
 22 **Incident Date** December 6, 2023
 23 **Complaint Date** May 22, 2024
 24 **Vehicle Identification Number** 2T3H1RFV2LW****

25 **Summary of Complaint**
 26 The vehicle start showing the (Engine maintenance required) message around 40k
 27 miles. The bypass coolant valve needs to be replaced. The dealership did confirm the
 28 issue. The issue will result in the engine overheating or seizure. A lot of people who
 own RAV4 2019-2024 had the same issue.

NHTSA ID Number: 11590086
Incident Date May 22, 2024
Complaint Date May 22, 2024
Vehicle Identification Number 2T3A1RFV4LW****

Summary of Complaint
 Engine maintenance required, contact dealer Alert displaying to replace coolant
 bypass valve. Vehicle has 38,144 miles. Internet search of this issue has been reported
 by several consumers with vehicles less then 4 years old. Not covered under warranty
 and quoted at \$700- ridiculous!

NHTSA ID Number: 11590460
Incident Date May 17, 2024
Complaint Date May 23, 2024
Vehicle Identification Number 2T3W1RFV1KW****

Summary of Complaint
 "Engine maintenance required" maintenance light on dashboard. Very common issue
 within RAV4s. This message blocks the odometer on the dashboard when visible. It
 shows warning lights on the display as well. The part that needs replacing is a
 "coolant bypass valve". My dealer wanted nearly \$1000 to replace this part, and told
 me this part was on back order nationwide. My car begins to overheat after 1.5 hours
 of driving. The dealer said to pull over when operating my vehicle and it begins to
 overheat. This problem is an inconvenience as I commute to work in a busy city. This
 problem was first presented last week after my scheduled oil change with my local

1 dealer. The next day (5/17/2024) the light came on my dashboard—unable to be
 2 removed. I first brought it into the dealer for a diagnostic on 5/20/2024, this is when
 3 they diagnosed a coolant bypass valve. I brought it back to the dealer today
 4 (5/23/2024) to have the part replaced, and was told it was on back order. I am afraid
 5 to operate my vehicle for long periods of time due to this issue. It has become a major
 6 inconvenience in my personal life this week, causing me to call out of work twice.
 7 This needs to be addressed by Toyota immediately.

8 **NHTSA ID Number:** 11590357

9 **Incident Date** May 16, 2024

10 **Complaint Date** May 23, 2024

11 **Vehicle Identification Number** 2T3C1RFVXLW****

12 **Summary of Complaint**

13 Coolant bypass valve failure. 2020 model year Vehicle has 38,000 miles with a failed
 14 coolant bypass valve.

15 **NHTSA ID Number:** 11590350

16 **Incident Date** May 22, 2024

17 **Complaint Date** May 23, 2024

18 **Vehicle Identification Number** 2T3F1RFV6LC****

19 **Summary of Complaint**

20 Engine Maintenance Required, Visit Dealer message came on, googled problem and
 21 Coolant Bypass Valve keeps popping up.

22 **NHTSA ID Number:** 11590670

23 **Incident Date** May 23, 2024

24 **Complaint Date** May 24, 2024

25 **Vehicle Identification Number** 2T3H1RFV1KW****

26 **Summary of Complaint**

27 "Engine Maintenance Required See Dealer" message keeps appearing on my
 28 dashboard took it to my local Toyota dealer and they confirmed the problem is the
 coolant bypass valve/hose \$150 to find the find the problem and \$700 to fix
 apparently this is common in 2019-2022 RAV4s. Now my car won't drive for long
 without over heating I have only had my car for a year and a half and drive less than
 5,000 a year.

29 **NHTSA ID Number:** 11590766

30 **Incident Date** May 24, 2024

31 **Complaint Date** May 25, 2024

32 **Vehicle Identification Number** 2T3F1RFV7LC****

33 **Summary of Complaint**

34 1. I had to have Injector Fuel Service due to my vehicle having a sluggish feeling
 35 while driving from Stop to Start. The vehicle also had a throttling motion while
 36 driving. 2. A message appeared on dashboard after a recent visit to the dealership after
 37 normal maintenance service, "Engine Maintenance Required" "Reach out to Dealer."
 38 This message specifically shows while I start up my vehicle and will not disappear if
 cancelled. "This is a warning for a coolant bypass valve failure"

39 **NHTSA ID Number:** 11590894

40 **Incident Date** May 27, 2024

41 **Complaint Date** May 27, 2024

42 **Vehicle Identification Number** JTMH1RFV4KD****

43 **Summary of Complaint**

44 Engine coolant valve by-pass issues. Engine coolant bypass hose fails.

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1 **NHTSA ID Number:** 11591345
 2 **Incident Date** April 8, 2024
 3 **Complaint Date** May 29, 2024
 4 **Vehicle Identification Number** 2T3K1RFV3KW****

5 **Summary of Complaint**

6 "Engine maintenance required" warning light came on and unable to bypass at all,
 7 leaving driver unable to read odometer or speedometer while driving. Had to go to the
 8 dealership 2 days in a row before they finally addressed the warning. Service staff
 9 informed this is indicating the coolant bypass valve is damaged or has failed. Also
 10 informed that this is a very common issue regardless of location, mileage, or usage of
 11 vehicle and will happen to all RAV4 owners of certain years eventually. A quick
 12 google search will show this is an extremely common issue and a result of using
 13 inferior quality parts in manufacturing. Toyota should recall this issue asap and
 14 reimburse drivers as many people have had the same problem. Had to pay over \$600
 15 at dealership to address issue that Toyota's manufacturing caused and to be able to
 16 have full usage of vehicle again. This is a dangerous issue if drivers without financial
 17 means to address this problem are driving without being able to use their vehicle
 18 display tools among other issues regarding the engine.

19 **NHTSA ID Number:** 11591322
 20 **Incident Date** May 25, 2024
 21 **Complaint Date** May 29, 2024
 22 **Vehicle Identification Number** 2T3N1RFV4LW****

23 **Summary of Complaint**

24 My 2020 Rav4 Limited AWD alerted me that the engine needed maintenance, and, so
 25 I parted it until Tuesday, After talking to the service professional at Passport Toyota,
 26 they told me about everything else but did not see that the light was on. They did my
 27 regular 55,000 miles maintenance on my car. So before driving away, I noticed that
 28 the alert was still blinking on my car. Their findings is that the coolant bypass
 valve/hose etc., has gone bad and is remaining in the open position. Apparently, this
 part isn't covered by warranty. After reading, there are a lot of years such as 2019,
 2018 to name a few having had the same problem. And to fix the problem it is
 \$857.22. Since this problem is occurring in a lot of Rav4's, and I noticed Camry's as
 well, should they look into why this is happening in a lot of models of their cars,
 SUV's etc.

29 **Corolla Complaints**

30 **NHTSA ID Number:** 11471443
 31 **Incident Date** June 24, 2022
 32 **Complaint Date** June 28, 2022
 33 **Vehicle Identification Number** JTDS4RCE3LJ****

34 **Summary of Complaint**

35 Code P2688115 engine maintenance required sign turned on at around 41000 miles.
 36 Other people having similar problems with coolant bypass valve. Suspect that coolant
 37 bypass valve safety standards might be at fault.

38 **NHTSA ID Number:** 11527522
 39 **Incident Date** June 2, 2023
 40 **Complaint Date** June 17, 2023
 41 **Vehicle Identification Number** JTDP4RCE3LJ****
 42 **Summary of Complaint**

1 Coolant bypass valve problem. Engine maintenance required light has come on. This
 2 part affects several other components of the vehicle. Toyota dealership wants to
 3 charge \$800 to fix it. It is a very common issue faced by many customers of 2020+
 Corollas and 2019+ Rav4s. All dealerships with service departments are aware of this
 issue.

4 **NHTSA ID Number:** 11528747

Incident Date June 24, 2023

Complaint Date June 25, 2023

Vehicle Identification Number 5YFS4RCE8LP****

6 **Summary of Complaint**

7 Just bought a used 20 Corolla SE and put less then 500 miles on it and got a
 8 "maintenance required return to dealer" notification on the dash and a warning
 9 message in my information screen via infotainment system. Dealer said they got
 10 nothing via a scan. The issue is the Coolant Bypass Valve. I reset the light on the dash
 11 and restarted my car with air off and it did not come back on. The second you turn on
 12 the air (the A/C in particular) the light immediately popped back on along with a new
 13 warning message. I've looked around and there's literally THOUSANDS of people
 14 reporting the same issue all on vehicles between 15k and 100k miles. The dealers also
 15 charge at least \$600-\$1100 to remedy this all too common issue as they will tell you it
 16 is not covered under warranty. I'm unsure of what promised damage to the vehicle
 17 could be but I know for a fact it's not nothing. Everyone is dumbstruck with how
 18 many people have this issue and there is still no Recall on this clearly terribly made
 Coolant Bypass Valve. It seems to apply of us that this is just a cash grab for Toyota

14 **NHTSA ID Number:** 11537654

Incident Date August 9, 2023

Complaint Date August 10, 2023

Vehicle Identification Number 5YFS4RCE8LP****

16 **Summary of Complaint**

17 Engine maintenance light came on and found out I had replace coolant bypass valve.
 18 Apparently this is an issue many 2020 corollas and RAV4 have issues with and need
 19 replacement. There's no reason or rhyme as to why it becomes faulty but should be
 20 recalled as many people have the same issue and dealership are aware of this issue.

19 **NHTSA ID Number:** 11540850

Incident Date August 25, 2023

Complaint Date August 25, 2023

Vehicle Identification Number 5YFS4MCE5MP****

21 **Summary of Complaint**

22 I went in after my vehicle displayed a check engine code after my recent visit to the
 23 dealer which included a regular oil change plus multi point inspection. At 51k miles
 24 the check engine went on and said immediately to go to the dealer. After paying for
 25 the dealer inspection, which was extra money, the issue was the engine coolant bypass
 26 valve for my vehicle that failed and leaked. I asked if this was common and the dealer
 27 said yes since they've been replacing them. I checked online forums and hundreds of
 28 people have had this issue at random miles. This costed me over \$900 dollars to repair
 and could of damaged my cars engine leaving me without a vehicle or cause a safety
 accident. I paid a hefty bill for a faulty item that should have been recalled since it's
 quite "common" according to the toyota dealership. I regularly maintain my vehicle
 with the recommended maintenance and this should have not occurred.

27 **NHTSA ID Number:** 11546144

Incident Date August 1, 2023

Complaint Date September 23, 2023

1 **Vehicle Identification Number 5YFS4RCE0LP******

2 **Summary of Complaint**

3 I had to replace all four tires before reaching 40k miles. Brakes needed to be fully
 4 replaced with only two years of driving it. AND Engine Maintenance Light on for an
 5 issue with the coolant bypass valve, not covered under warranty. This is causing
 6 issues with the engine, when driving even at 25 miles per hour or at 65 the car sounds
 7 like its dragging or forcing itself, the wheel shake & car feels unbalanced even with a
 8 tire alignment. Overall i give the car a 2.5 out 5 star in performance. The body of the
 9 car is so fragile and made by very cheap materials. Spending a fortune on this vehicle
 10 and it hasnt even reached 60k miles yet.

11 **NHTSA ID Number: 11552606**

12 **Incident Date** October 23, 2023

13 **Complaint Date** October 30, 2023

14 **Vehicle Identification Number 5YFM4RCEXLP******

15 **Summary of Complaint**

16 In the past week at 30,700 miles, my 2020 Toyota Corolla "Engine Maintenance light;
 17 see dealer" service light appeared on the dash. Through talking with a Toyota dealer,
 18 they are aware of this issue with Corollas, Camrys, and Rav4's. It is an engine coolant
 19 bypass valve, and appears to be faulty in many vehicles according to youtube videos,
 20 google, and Toyota service. Perhaps this needs to be a recall? Also, the dealer wants
 21 almost \$800 to repair even though many people do it on youtube in under an hour.
 22 Parts are less than \$200, and 1.5 hours of labor do not add up to \$800.

23 **NHTSA ID Number: 11557060**

24 **Incident Date** November 27, 2023

25 **Complaint Date** November 27, 2023

26 **Vehicle Identification Number JTDS4RCE7LJ******

27 **Summary of Complaint**

28 Coolant bypass valve failure. Replacement part carried the same defect.

NHTSA ID Number: 11565585

Incident Date October 9, 2023

Complaint Date January 15, 2024

Vehicle Identification Number JTNK4RBE5K3****

Summary of Complaint

Coolant bypass valve failed prior to car driving 50,000, confirmed by dealership.
 Failure can cause electrical issues. Car indicated engine maintenance required

NHTSA ID Number: 11566170

Incident Date September 6, 2023

Complaint Date January 17, 2024

Vehicle Identification Number JTDS4RCE0LJ****

Summary of Complaint

Around 40k miles I received an Engine Maintenance Required warning. After some
 research Engine Maintenance and Engine Service Required are two very different
 indicators. I received and P2681 code meaning the electrical coolant bypass valve had
 failed unfortunately one can't tell if it's stuck shut or open this could lead to one's
 care over heating and or damaging one's engine. After some research I've come to
 find out most 2020-2024 corollas have been having this issue tends to happen about
 30-50k miles

NHTSA ID Number: 11568354

Incident Date January 27, 2024

Complaint Date January 28, 2024

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1 **Vehicle Identification Number JTNA4RBE2L3******

2 **Summary of Complaint**

3 The coolant bypass valve in some Toyota models has been malfunctioning recently
 4 and has become a common issue. Dealer confirmed that this was the issue per
 5 attached diagnostic report/invoice copy. Costs were >\$800 to repair the issue for a
 <\$100 part and 30 minutes of labor. The "Engine Maintenance Required" warning
 was visible in the display. Unsure as to the short or long-term effects of this
 malfunctioning part, but as it's related to the cooling system of the vehicle, it may
 trigger other more serious issues

6 **NHTSA ID Number: 11568593**

7 **Incident Date** January 7, 2024

8 **Complaint Date** January 29, 2024

9 **Vehicle Identification Number JTDS4RCE3LJ******

10 **Summary of Complaint**

11 There is a thing that's happening to a lot of Corollas and I think RAV4 and some
 12 cram it's called engine maintenance required and a lot of mechanics don't know what
 13 that means so you have to take it to the dealership to get it fixed and it's like a \$900
 14 fix and it's been happening to a lot of vehicles around 35,000 miles. It's called the
 15 coolant bypass valve. There is hundreds of YouTube videos about it and people
 16 complaining about it on forums.

17 **NHTSA ID Number: 11569018**

18 **Incident Date** January 31, 2024

19 **Complaint Date** January 31, 2024

20 **Vehicle Identification Number JTDT4RCE8LJ******

21 **Summary of Complaint**

22 Coolant bypass valve bad cost \$550+ to fix car is 4 years old

23 **NHTSA ID Number: 11574504**

24 **Incident Date** February 28, 2024

25 **Complaint Date** February 28, 2024

26 **Vehicle Identification Number 5YFS4RCE8LP******

27 **Summary of Complaint**

28 Coolent bypass valve

29 **NHTSA ID Number: 11575517**

30 **Incident Date** February 29, 2024

31 **Complaint Date** March 5, 2024

32 **Vehicle Identification Number JTND4RBEXL3******

33 **Summary of Complaint**

34 Coolant bypass valve leaks through wiring and damages itself.

35 **NHTSA ID Number: 11575629**

36 **Incident Date** March 5, 2024

37 **Complaint Date** March 5, 2024

38 **Vehicle Identification Number 5YFS4RCE1LP******

39 **Summary of Complaint**

40 toyota 2020 COOLANT BYPASS VALVE Circuit Short.

41 **NHTSA ID Number: 11575546**

42 **Incident Date** March 1, 2024

43 **Complaint Date** March 5, 2024

44 **Vehicle Identification Number JTND4RBE8L3******

45 **Summary of Complaint**

1 After I had brought a my car to the dealer for its oil change and tire rotation, a
 2 warning message came from my car saying "Engine Maintenance Required". After
 3 checking with my dealer, they said that the coolant bypass valve needed to be
 replaced. After checking online, it seems that this is a common problem for recent
 Toyota vehicles.

4 **NHTSA ID Number:** 11575551
 5 **Incident Date** March 1, 2024
 6 **Complaint Date** March 5, 2024
 7 **Vehicle Identification Number** JTND4RBE8L3****
 8 **Summary of Complaint**

9 After bringing my vehicle in for its oil change and tire rotation, a warning message
 10 showed up from my car saying "Engine Maintenance Required". After checking with
 11 my dealer, they said that the coolant bypass valve needed to be replaced. My car only
 12 has 33,000 miles and has had no issues whatsoever.

13 **NHTSA ID Number:** 11576109
 14 **Incident Date** February 1, 2024
 15 **Complaint Date** March 7, 2024
 16 **Vehicle Identification Number** 5YFS4RCE9LP****
 17 **Summary of Complaint**

18 I discovered that my 2020 Toyota Corolla SE has a Coolant Valve Bypass
 19 malfunction coded "p2688115". I have also discovered this a prevalent issue after you
 20 hit 70,000 miles. There are forums all over the internet with complaints about the
 21 same issue as mine. I did some research and found no recalls. With this being such a
 22 common issue for no reason, faulty equipment. The car has been inspected by a
 23 Toyota dealer in Bradenton, FL because we had thought the service vehicle message
 24 was for a tire rotation. They scanned the vehicle and discovered the fault code
 25 "p2688115" after trying to reset it numerous times. The senior tech was the one who
 26 scanned it. He knew the exact reason why it was not clearing before scanning the
 27 vehicle. He only scanned it to solidify his hypothesis. I then spoke to the service team,
 28 they wanted me to bring it in for a diagnosis that would cost \$85.00 if my warranty
 did not cover it. The cost of the part was estimated at around \$150.00 plus labor and
 taxes. It was over a \$400.00 repair. For a repair as such, this needs to be recalled. The
 warning message never went away, if you tried to clear it to view the screen you had
 about three seconds before it came back on. It is a major safety risk for those who
 wear glasses and drive at night. I use the screen to keep myself safe and maintain my
 driving speed. This warning message came on around 70,000. Some so many other
 individuals have experienced and complained about the same problem. This needs to
 be escalated. I am not allowed to utilize the safety features my car has to offer. Please
 take action and commence an investigation.

29 **NHTSA ID Number:** 11576977
 30 **Incident Date** March 12, 2024
 31 **Complaint Date** March 12, 2024
 32 **Vehicle Identification Number** 5YFS4RCE6LP****
 33 **Summary of Complaint**

34 Engine Coolant Bypass Valve replacement , Toyota is charging me 888 dollars for
 35 repair.

36 **NHTSA ID Number:** 11578007
 37 **Incident Date** March 18, 2024
 38 **Complaint Date** March 18, 2024
 39 **Vehicle Identification Number** 5YFS4RCEXLP****
 40 **Summary of Complaint**

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 33 WEST MISSION STREET, SUITE 201
 SANTA BARBARA, CALIFORNIA 93101

1 I purchased my vehicle new in 2020. I am currently at 74,000 miles and noticed my
 2 engine maintenance required light come on although I received an oil change service
 3 two days prior. It's a different message from the routine maintenance. I got it checked
 4 out at Toyota today and the "engine coolant bypass valve" needed to be replaced.
 When I looked into it I noticed the 2020 Camry and 2020 rav 4 were recalled for the
 issue and repaired for free. However my model Toyota Corolla was not recalled and I
 had to pay \$700.82 to get it replaced at Toyota today.

5 **NHTSA ID Number:** 11578105
 6 **Incident Date** March 6, 2024
 7 **Complaint Date** March 18, 2024
 8 **Vehicle Identification Number** JTDS4RCE3LJ****

9 **Summary of Complaint**

10 Had my car (Toyota Corolla 2020 SE) give a "engine maintenance required, take to a
 11 dealer" error message on my digital dashboard. No error codes from any maintenance
 12 device but apparently only the Toyota dealership can find this in the software using
 13 their computers to find it somewhere deep in there... The problem is the upper engine
 14 coolant bypass valve. This is costing me almost \$1000 including the \$80+ in
 15 diagnostics that ONLY the Toyota dealership can see and find out. Apparently this is
 16 a very common occurrence with the 4 cylinder corollas and RAV4s.

17 **NHTSA ID Number:** 11578752
 18 **Incident Date** March 20, 2024
 19 **Complaint Date** March 21, 2024
 20 **Vehicle Identification Number** 5YFS4RCE4LP****

21 **Summary of Complaint**

22 My 2020 Toyota Corolla had a warning light turn on, on 3/20/2024. The warning read
 23 "Engine Maintenance Required". I looked up this issue and read that many people
 24 were having similar issues with the coolant bypass valve. I took my car to my local
 25 Toyota dealership and they confirmed it was the coolant bypass valve. The risks
 26 included in this failure can be overheating and engine damage.

27 **NHTSA ID Number:** 11579128
 28 **Incident Date** March 23, 2024
Complaint Date March 24, 2024
Vehicle Identification Number JTNK4RBE8K3****

Summary of Complaint

4 years after production with approx 44k miles the car began displaying the message
 "engine maintained required visit dealer" after investigating discovered coolant valve
 was the issue. Problem seems to be a common occurrence with the model car for other
 owners.

NHTSA ID Number: 11579436
Incident Date March 25, 2024
Complaint Date March 26, 2024
Vehicle Identification Number JTNK4RBE2K3****

Summary of Complaint

ENGINE MAINTENANCE CAME ON, TOOK IT TO DEALERSHIP AND WAS
 TOLD THE DIAGNOSTIC TEST SHOWED COOLANT BYPASS VALVE.
 APPARENTLY THIS IS A RECURRING ISSUE AND IF NOT TAKING CARE
 OF, IT COULD CAUSE MAJOR PROBLEMS. I WAS TOLD THE PART IS \$200
 PLUS AND LABOR IS \$500 PLUS. THIS SHOULD BE A RECALL ISSUE AND
 FIXED FREE OF CHARGE BY TOYOTA. IN DOING A GOOGLE SEARCH,

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1 SEVERAL COMPLAINTS ARE LISTED REGARDING THIS ISSUE. THE
2 GENTLEMAN AT THE DEALERSHIP WHERE I TOOK MY CAR STATED HE
3 HAS DONE SEVERAL VEHICLES RECENTLY WITH THIS ISSUE. I DON'T
4 THINK USE AS A CUSTOMER SHOULD HAVE TO PAY FOR THIS KNOWN
5 ISSUE BY TOYOTA. I'M ALSO STILL WAITING TO GET THE RECALL FIXED
6 ON MY MOTHER'S TOYOTA RAV4 RECALL WHICH I RECEIVED
7 NOTIFICATION ON BACK IN EARLY 2023. THEIR EXCUSE IS NOT PARTS
8 AVAILABLE. SO IN THE MEAN TIME, IF THE VEHICLE CATCHES FIRE,
9 THEY SAY OH WELL. I AM OVER TOYOTA GETTING AWAY WITH THIS.

6 **NHTSA ID Number:** 11579594
7 **Incident Date** March 26, 2024
8 **Complaint Date** March 26, 2024
9 **Vehicle Identification Number** 5YFS4RCE0LP****
10 **Summary of Complaint**
11 Engine coolant bypass valve becomes faulty at low mileage

10 **NHTSA ID Number:** 11580091
11 **Incident Date** February 19, 2024
12 **Complaint Date** March 29, 2024
13 **Vehicle Identification Number** JTDS4RCE9LJ****
14 **Summary of Complaint**
15 "Engine Maintenance Required Visit Dealer" keeps popping up despite engine being
16 fine. Another scan by my mechanic determined that the cooling bypass valve is
17 having an issue/keeps getting stuck and triggering the maintenance alert to keep going
18 off.

15 **NHTSA ID Number:** 11581098
16 **Incident Date** April 4, 2024
17 **Complaint Date** April 4, 2024
18 **Vehicle Identification Number** JTNK4RBE9K3****
19 **Summary of Complaint**
20 Engine coolant bypass valve circuit short to battery or open - code P268115 Engine
21 maintenance alert light appeared after (a day after, and then would not be on, and
22 sometimes turn on, erratic maintenance message) I brought car in for scheduled
23 engine maintenance per Toyota. The Toyota technician advised me to immediately
24 take care of it but does not have the part in stock. This is the Toyota Dealer service in
25 Manhattan Beach, CA.

21 **NHTSA ID Number:** 11581662
22 **Incident Date** May 19, 2023
23 **Complaint Date** April 8, 2024
24 **Vehicle Identification Number** JTDS4RCEXLJ****
25 **Summary of Complaint**
26 Engine maintenance required People on internet saying that i need to change the
27 coolant bypass valve

25 **NHTSA ID Number:** 11581838
26 **Incident Date** March 14, 2024
27 **Complaint Date** April 9, 2024
28 **Vehicle Identification Number** 5YFS4MCE3MP****
Summary of Complaint
The engine coolant bypass valve circuit short to battery or open and lower hose -
Trouble Code - DTC: P268115. The error message "Engine Maintenance Required -
Visit Your Dealer" was consistently popping up and I couldn't see my speed or dash

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1 or how many miles I had till empty even after acknowledging the message and
 2 pressing ok & back. It would stay on while my car was on no matter what. I couldn't
 3 use or see any of my information on my dash. The problem has come up multiple
 4 times by different people in the auto forum and I was warned that I would have to
 5 replace it again in 15 months. There was no light that came on on my dash just the
 6 message that would pop up and block my speed so I couldn't see how fast I was going
 7 or when I was going to be out of gas. I'm not sure if it's been inspected by the
 8 manufacturer. It first appeared after 3 years of owning my brand new car. I was very
 9 shocked that I already needed to replace a part in my engine after only having and
 driving my car for a short amount of time and 30,000 miles on it. It was an expensive
 part and caused me to have to guess how fast I was going while driving as I couldn't
 see or get the message to go away even after acknowledging it. I took it to Toyota and
 they told me the only way to get the notification to go away was to replace it but they
 did tell me that they have recently had multiple cars come in with the same issue. I
 had to drive my car in danger as I couldn't immediately afford to pay to get it fixed
 right away and was in college away from home and didn't have enough time to leave
 my car in the shop.

10 **NHTSA ID Number:** 11582261
 11 **Incident Date** April 10, 2024
 12 **Complaint Date** April 10, 2024
 13 **Consumer Location** WHITTIER, CA
 14 **Vehicle Identification Number** 5YFS4RCE4LP****

15 **Summary of Complaint**

16 Experience with a faulty Coolant Bypass Valve. Read enough information of this
 17 being a problem with newer toyotas (RAVs, Camrys, Corollas, etc.). Cannot get rid of
 18 Engine Maintenance Required notification on dash which pops up every 10 seconds
 19 when I'm driving after I dismiss it. This specific notificaiton is also NOT in the
 20 Toyota Manual whatsoever, and no it is not the Maintenance Service Required
 21 notification that comes up every 5,000 miles for basic check up.

22 **NHTSA ID Number:** 11582798
 23 **Incident Date** April 7, 2024
 24 **Complaint Date** April 13, 2024
 25 **Vehicle Identification Number** JTDS4RCE9LJ****

26 **Summary of Complaint**

27 Dashboard stated engine maintenance required- visit your dealer and it turned out to
 28 be a bypass coolant valve malfunction per Toyota mechanic specialists.

NHTSA ID Number: 11583169
Incident Date April 14, 2024
Complaint Date April 15, 2024
Vehicle Identification Number JTDS4RCE1LJ****

Summary of Complaint

Engine coolant bypass valve failed at 36,981 miles.

NHTSA ID Number: 11583316
Incident Date April 14, 2024
Complaint Date April 16, 2024
Vehicle Identification Number JTDS4RCE4LJ****

Summary of Complaint

Engine maintenance required light comes on and it wont go away. Happened around
 65000 miles. It is cracked engine coolant bypass valve. It is happening to all toyota
 corolla 2020s. Dealer is asking \$1200 to fix it.

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NHTSA ID Number: 11583816
Incident Date April 17, 2024
Complaint Date April 18, 2024
Vehicle Identification Number JTDS4RCE1LJ****

Summary of Complaint
The engine coolant bypass valve needed replacement at around 70,000 miles. Similar replacement have been needed in other corollas models of the same year.

NHTSA ID Number: 11584356
Incident Date April 21, 2024
Complaint Date April 21, 2024
Vehicle Identification Number JTDS4RCE0LJ****

Summary of Complaint
engine coolant bypass valve issues under 70k miles

NHTSA ID Number: 11584448
Incident Date April 15, 2024
Complaint Date April 22, 2024
Vehicle Identification Number JTDS4RCE3LJ****

Summary of Complaint
Warning display message “Engine Maintenance Required Visit Your Dealer”. After diagnostic at the dealer, coolant bypass valve failed and needed replacement with hefty, almost \$900.00 for parts and labor cost. Did research online, and it seems that more vehicles from the year 2020-2021 have experienced the same issue at 30-55k miles, my car is on 106k miles. Please do a recall for this issue and extend warranty to \$200k miles. This car should not have this sort of issue!

NHTSA ID Number: 11584948
Incident Date April 24, 2024
Complaint Date 24, 2024
Vehicle Identification Number JTDS4RCE6LJ****

Summary of Complaint
An engine maintenance required popped up in the vehicle and was unable to be removed Took the vehicle to get checked at a Toyota dealership and they advised it was the coolant valve bypass was faulty

NHTSA ID Number: 11585089
Incident Date April 15, 2024
Complaint Date April 24, 2024
Vehicle Identification Number JTDS4RCE2LJ****

Summary of Complaint
Maintenance required please see dealer message pops up and cannot be dismissed. Coolant sensor bypass valve is damaged.

NHTSA ID Number: 11585595
Incident Date April 19, 2024
Complaint Date April 27, 2024
Vehicle Identification Number JTDS4RCE2LJ****

Summary of Complaint
My engine maintenance required screen came on in my car. When I ran the diagnostic, they stated that the coolant bypass valve needs to be replaced in order to prevent the engine from overheating. This seems to happen on all of the 2020 and 2021 Toyota Corollas.

NHTSA ID Number: 11585936

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Incident Date April 24, 2024
Complaint Date April 29, 2024
Vehicle Identification Number JTDS4RCE7LJ****

Summary of Complaint
 Known issue in certain Toyota models and years that the coolant bypass valve fails causing a "Engine Maintenance is Required. See Dealer." Toyota is well aware of the issue but has yet to fix the problem as driving with a failed coolant part for too long could cause overheating.

NHTSA ID Number: 11586250
Incident Date April 30, 2024
Complaint Date May 1, 2024
Vehicle Identification Number JTDP4RCE9LJ****

Summary of Complaint
 Coolant bypass valve failure. Dealer (Atkins Kroll, Toyota Guam) is conveniently charging me over \$600 for repair for a common issue for vehicles of this generation.

NHTSA ID Number: 11586995
Incident Date May 4, 2024
Complaint Date May 4, 2024
Vehicle Identification Number JTDT4RCE0LJ****

Summary of Complaint
 At 4 years and 1/2 old car 2020 Corolla XSE an Engine Maintenance Required SEE DEALER light turned on. Did diagnostic with OBD 2 scanner at two locations auto body shop and Uto zone. Nothing appears. It is in fact a NEEDED future recall since thousands if not more people have encountered the same. It is a Coolant By Pass Valve. Cost is only \$99.53 + tax at dealer. Problem is that should be under warranty or extended warranty or recall. Dealer likes to charge \$800 (180-200 for diagnostic, \$110 part, \$400 labor. Part only takes 30 minutes to install. I should be able to buy at dealer for \$110 and have them install for free or pay 30 minutes of work time = \$85. 1 hour is about \$175. So instead of trying to be billed \$800 I should only be billed for \$85 labor (30 minutes) + \$110 part = Brand total of \$105 USD. My daughter [XXX] and I, [XXX] (dad) bought the car at Longo Toyota El Monte, CA 91731.
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NHTSA ID Number: 11587551
Incident Date May 7, 2024
Complaint Date May 7, 2024
Vehicle Identification Number JTDS4RCE6LJ****

Summary of Complaint
 The Engine Coolant Bypass Valve Short in the vehicle has malfunctioned. This appears to be widespread issue not only in the Corolla, but in the Camry and RAV4, and appears to affect model years 2019-2024. This issue caused coolant leakage, has the potential to cause issues with the engine, and affects the A/C/Heating systems as well. There were no warning signs prior to the failure, and the car had just passed a multi point inspection 4 days prior to the failure. The problem has been reproduced by my local Toyota dealership.

NHTSA ID Number: 11587729
Incident Date May 7, 2024
Complaint Date May 8, 2024
Vehicle Identification Number JTNC4RBE0L3****

Summary of Complaint

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1 Engine coolant valve is broken. Part of power train as it cools circuits for the power
2 train.

3 **NHTSA ID Number:** 11588615
4 **Incident Date** May 3, 2024
5 **Complaint Date** May 14, 2024
6 **Vehicle Identification Number** JTDS4RCE6LJ****
7 **Summary of Complaint**

8 Check engine light is giving a false positive. There is something wrong with the
9 coolant bypass valve. I checked online and this is not an isolated event.

10 **NHTSA ID Number:** 11588845
11 **Incident Date** May 1, 2024
12 **Complaint Date** May 15, 2024
13 **Vehicle Identification Number** JTDS4RCE5LJ****
14 **Summary of Complaint**

15 Coolant bypass valve failed at 52k miles.

16 **NHTSA ID Number:** 11589408
17 **Incident Date** May 11, 2024
18 **Complaint Date** May 18, 2024
19 **Vehicle Identification Number** JTDS4RCE1LJ****
20 **Summary of Complaint**

21 coolant bypass valve issue under 60k miles.

22 **NHTSA ID Number:** 11589458
23 **Incident Date** May 17, 2024
24 **Complaint Date** May 18, 2024
25 **Vehicle Identification Number** JTDP4RCE0LJ****
26 **Summary of Complaint**

27 Engine maintenance required . bypass coolant valve defected

28 **NHTSA ID Number:** 11589648
29 **Incident Date** May 19, 2024
30 **Complaint Date** May 20, 2024
31 **Vehicle Identification Number** 5YFS4RCE5LP****
32 **Summary of Complaint**

33 At 55K miles for my 2020 Toyota Corolla, the Engine Maintenance Required
34 notification popped up on my screen and is not removable. Upon further verification
35 numerous 2020-2021 corollas have been having this issue at similar amounts of
36 mileage. It is a faulty Engine Coolant Bypass Valve that needs to be replaced. If I
37 were to take it in to a dealership, they would charge \$500+ just as they have for many
38 others when it should really be a recall. As of now I have not taken it to be inspected
39 due to fear of steep labor costs. My safety is at risk because if this does not get
40 replaced my engine will overheat causing total failure of the car, and as a 2020 model
41 with such low mileage, this is ridiculous.

42 **NHTSA ID Number:** 11589793
43 **Incident Date** May 20, 2024
44 **Complaint Date** May 20, 2024
45 **Vehicle Identification Number** JTDS4RCE1LJ****
46 **Summary of Complaint**

47 The coolant bypass valve was constructed of poor quality plastic, and has cracked at a
48 mere 50,000 miles. It's Leaking coolant into the sensor. Along with potentially
49 causing major damage to the engine.

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NHTSA ID Number: 11589815
Incident Date May 13, 2024
Complaint Date May 21, 2024
Vehicle Identification Number JTNK4RBE6K3****
Summary of Complaint
Coolant valve is faulty.

NHTSA ID Number: 11589830
Incident Date May 21, 2024
Complaint Date May 21, 2024
Vehicle Identification Number 5YFS4MCE3MP****
Summary of Complaint
Engine coolant bypass valve short to battery. Throwing code - P2681-15 at 33,000 miles.

NHTSA ID Number: 11590189
Incident Date May 18, 2024
Complaint Date May 22, 2024
Vehicle Identification Number JTDS4RCE4LJ****
Summary of Complaint
"Engine Maintenance Required - Visit Your Dealer" message popped up on my car's (Toyota Corolla 2020) dashboard all of a sudden and I didn't have any issues with engine before. I brought up my card to Toyota Service Center in Sunnyvale, CA and they told me that my car's coolant bypass valve has to be replaced and re-check if it's needed which is an uncertain thing and advised me not driving the car as it may damage the cooling system components or even the engine itself. All of these will cost me 911.58\$ which is too much but it's not all yet. I was researching this issue on the Internet and figured out that many people who has the Corolla 2020 and 2021 had the exact same issue. I don't think it's a coincidence. People also complaining about the same issue for Toyota Rav4 and Toyota Camry. I don't want to pay so much money which is almost 1k. I never had any accidents and or crashes. [XXX] [XXX] [XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11590704
Incident Date May 8, 2024
Complaint Date May 25, 2024
Vehicle Identification Number 5YFS4RCE8LP****
Summary of Complaint
Coolant bypass valve bad at 26000 miles

NHTSA ID Number: 11591416
Incident Date May 18, 2024
Complaint Date May 29, 2024
Vehicle Identification Number JTDS4RCE7LJ****
Summary of Complaint
Engine maintance required/coolant bypass valve issue

NHTSA ID Number: 11591231
Incident Date May 15, 2024
Complaint Date May 29, 2024
Vehicle Identification Number JTNK4RBEXK3****
Summary of Complaint

1 The bypass coolant valve has failed. Car displays message stating engine maintenance
 2 required but no other warning signs. Diagnostic test proved that it's the bypass
 3 coolant valves. Upon further research this seems to be a frequent problem on the 2019
 4 to 2022 Toyotas.

5 **NHTSA ID Number:** 11591354

6 **Incident Date** May 18, 2024

7 **Complaint Date** May 29, 2024

8 **Vehicle Identification Number** 5YFS4MCE4MP****

9 **Summary of Complaint**

10 Coolant bypass valve stuck shut at 65k miles. Seems like it's a common occurrence
 11 with newer Toyotas. Was told to report it as a safety issue.

12 81. In addition to being on notice of the Defect through NHTSA and other
 13 complaints, Defendants also directly learned of the Defect from their network of dealerships.
 14 Many of the customers who wrote online or to Toyota about their negative experiences with
 15 the Defect reported having taken their Class Vehicles into Toyota dealerships because of the
 16 Defect.

17 82. Further, the internet is replete with examples of blogs and other websites where
 18 Class Members have complained of the exact same Defect in the Class Vehicles. A sampling
 19 of those complaints is included below:

- 20 a. On April 15, 2021, a consumer wrote: "My 2020 Corolla SE has 73296 miles
 21 and suddenly displayed Engine Maintenance Required message 1500 miles after
 22 last oil change. The dealer clear the code p2688115 but it came back few minutes
 23 later. Did someone experienced it?"⁹
- 24 b. On April 22, 2022, a consumer wrote: "I got DTC P2681-15 on my car today
 25 which means it's time to change the coolant bypass valve. The only problem is
 26 I can't tell if I'm blind or what but I can't find it. On my previous cars it was
 27 kinda sitting up top near the front. could someone please point it out in a picture
 28 and the part number if you have it? Thank you."¹⁰

⁹ <https://www.toyotanation.com/threads/code-p2688115-cleared-tested-but-still-coming-back.1697350/> (last visited May 14, 2024)

¹⁰ <https://www.toyotanation.com/posts/14625169/> (last visited May 14, 2024)

- 1 c. In or around May 2022, a consumer wrote: “My 2020 with 47k miles needed the
 2 coolant bypass valve replaced. Toyota said the power train warranty wouldn’t
 3 cover it... so 600 dollars later it’s fixed. I’ve seen other post that this is becoming
 4 a common issue. Hopefully it recalls soon for I can get my money back. Also
 5 the only reason I found out it was bad. I had an engine maintenance required
 6 messaged that would not go away. I thought it was the service message but it
 7 wouldn’t clear. So after doing some research it seems that message is for this
 8 issue.”¹¹
- 9 d. On December 15, 2022, a consumer wrote: “So frustrated with this situation.
 10 The "engine maintenance required" warning comes on whenever the AC is
 11 turned on. The warning cannot be reset by the normal means but can be reset
 12 (usually) by turning the car off. The dealership says the issue is the coolant
 13 bypass valve, and the only fix is a replacement (at about \$700). I see no options
 14 but to just get over my anger/disappointment about replacing a part that is less
 15 than 3 years old and replace it?”¹²
- 16 e. On April 5, 2023, a consumer wrote: “Help! Check engine light 35k miles,
 17 Engine Coolant Bypass Valve? Hey, I need help and if this is an easy fix. I have
 18 a check engine light come on only when I turn the AC on. the dealer said it was
 19 the engine coolant bypass valve and quoted me at \$900 crazy. Is this something
 20 I can fix myself? I have a 2020 SE with only 35k miles and the VINN starts with
 21 a 5. Any pictures or advice to anyone who experienced this thank you for any
 22 help!”¹³

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 24
 25 ¹¹ https://www.reddit.com/r/rav4club/comments/y7u9a9/2020_coolant_bypass_valve_replaced/ (last
 26 visited May 14, 2024)

27 ¹² [https://www.reddit.com/r/Toyota/comments/zmq97z/2020_rav4_coolant_bypass_valve_replacement
 28 /?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button](https://www.reddit.com/r/Toyota/comments/zmq97z/2020_rav4_coolant_bypass_valve_replacement/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button) (last visited May 14, 2024)

¹³ <https://www.toyotanation.com/posts/14811261/> (last visited May 14, 2024)

- 1 f. On April 16, 2023, a consumer wrote: “This bypass valve is used on our 5th gen
 2 RAVs and the SAME valve is also on the latest generation of Camrys and
 3 Corollas. I can't say whether the valve failure is "common" but its been reported
 4 multiple times both here and on the Toyota Nation forum and Reddit Rav4 Club
 5 in all three models of Toyota. Some cars have failures at low mileage and some
 6 at high--there is no pattern. Some high mileage cars NEVER had a failure. There
 7 is NO way to tell if the valve is cracking and/or shorting out its electrical
 8 connector. I suppose if you periodically inspect the valve you may see coolant
 9 leakage if the crack is EXTERNAL--but sometimes they fail internally and
 10 corrode or foul the electrical connector. The first you will know of the valve
 11 failure is the MID screen warning "ENGINE maintenance required" (and only
 12 when running the A/C or heater) and this is different from the usual
 13 "maintenance required" oil change 5000 mile warning.”¹⁴
- 14 g. In or around May 2023, a consumer wrote: “Vehicle is a 2019 RAV4, odometer
 15 reads 41,600. I’ve had a persistent “Engine Maintenance Required” notification
 16 on the MID screen for the last 1700 miles or so, literally the day after getting a
 17 scheduled service at the dealer. I initially thought it was just the service
 18 reminder, so I didn’t think much of it, and just ignored it. But eventually it
 19 became so annoying that I tried to clear the notification, and couldn’t-- and upon
 20 further research, it turns out the notification is probably the result of a leaking
 21 coolant bypass valve. Seems like every RAV4 owner and their mother is having
 22 the same issue with these cheap, plastic components. I haven’t noticed any loss
 23 in coolant, haven’t experienced any abnormal engine temps, and haven't had any
 24 CELs. I’ve also noticed that the notification only comes on now when I have the
 25 A/C turned on.”¹⁵

26
 27 ¹⁴ <https://www.rav4world.com/threads/coolant-flow-valve-and-bleed-coolant-system-difficult-to-fix.321806/page-3> (last visited May 14, 2024)

28 ¹⁵

1 h. On May 24, 2023, a consumer wrote: “So my 2020 Corolla with only 30k miles
 2 on just recently had the check engine/drive start control malfunction/engine
 3 maintenance required lights all come on at the same time. I scanned it and found
 4 the codes P26AC11, P268111 “Engine coolant bypass valve circuit short to
 5 ground”. I checked both valves and the top one behind the engine was leaking
 6 coolant into the wire harness port, which cause a short and corroded the
 7 pins/connector. I bought a new valve from the dealership, but they apparently
 8 don’t sell the new wire harness, so they sold me the plastic plug parts of the
 9 harness, as well as 2 grey wires that have the right connectors, but are 1-2 gauge
 10 bigger than the originals. I put the new harness together, making sure I matched
 11 the colors to how they were on the old connector, then the code went away for
 12 about a day and a half. I now have the code P26AD “Engine coolant bypass
 13 valve B control circuit low”. I re-spliced the wires to make sure that the
 14 connection was good, and tested them for continuity/voltage/fuses. Continuity
 15 is good, fuses are good and voltage comes up as 12.7v on the red wire, and .20V
 16 on the blue wire. I’m not sure what they’re supposed to be at, or what is causing
 17 the issue. Of course I can’t get a wiring diagram or anything since the vehicle is
 18 still new. Would it be possible that the 1-2 gauge bigger wire (small to big wire)
 19 cause an issue with low voltage? I wouldn’t think so, but I’m not an electrician.
 20 Any help would be appreciated.”¹⁶

21 i. In or around July 2023, a consumer wrote: “My 2019 RAV4 XLE with 35k has
 22 same problem since last fews weeks.dealer ship ask for 800 something to fix,
 23 but i try to change the coolant bypass valve later. when i unplug the connector
 24
 25

26
 27 https://www.reddit.com/r/rav4club/comments/14491xh/toyota_coolant_bypass_valve_issue/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button
 28 (last visited May 14, 2024)

¹⁶ <https://www.toyotanation.com/posts/14840557/> (last visited May 14, 2024)

1 from the coolant bypass valve and start the car, the message is gone.. and it plus
 2 in , the message comes out again.”¹⁷

3 j. In or around September 2023, a consumer wrote: “My Rav4 2019 had the same
 4 alert message in my dash to take to the dealer. They diagnosed and said it was
 5 the coolant bypass. The dealer said that I should keep my receipt for the future
 6 because this is such a common problem that they may do a future recall and I
 7 will be reimbursed. Hopefully there is a class action.”¹⁸

8 k. On September 1, 2023, a consumer wrote: “I got the dreaded ‘engine
 9 maintenance required’ message on my dash last weekend, (different than the
 10 regular ‘maintenance required’ message for oil changes), no engine check light
 11 on, and dealership diagnosed it and confirmed it was the coolant bypass valve
 12 needing to be replaced. Not covered under my powertrain warranty of course, so
 13 part and labor all together plus tax I’m looking at almost \$1000 for it total. How
 14 hard is this to replace by oneself? How dire of a problem is this to fix right away?
 15 Can this wait to be fixed for a month or two so we can save the money up to fix
 16 it?”¹⁹

17 l. In or around October 2023, a consumer wrote: “I have a 2020 Rav 4 LE, dealing
 18 with the exact same situation. Dealer wants almost 700.0 to fix it, both
 19 powertrain warranty and the 5 yr/36k mile doesn’t cover the cost for repairs.
 20
 21
 22

23 ¹⁷

24 https://www.reddit.com/r/rav4club/comments/y7u9a9/comment/jtcjeya/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button (last visited May
 25 14, 2024)

¹⁸

26 https://www.reddit.com/r/rav4club/comments/14491xh/comment/k2ldu3j/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button (last visited May
 27 14, 2024)

28 ¹⁹ https://www.reddit.com/r/rav4club/comments/167gy66/coolant_bypass_valve_failure_help/ (last
 visited May 14, 2024)

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1 Only 30,000 miles on the Fing thing! Michale’s Toyota of Bellevue in
2 Washington state. So frustrating”²⁰

3 m. In or around January 2024, a consumer wrote: “As you may have noticed or have
4 been affected the check engine light may turn on and display visit the dealer
5 around 30-55k miles. Multiple people reported the coolant bypass issue in this
6 forum and in others after running the diagnostics. It's not covered under power
7 terrain but it may be for extended warranty. Mine occurred around 45k miles and
8 the cost was steep ~\$800 for a 2021 toyota corolla at the dealer. If you
9 experienced this please report it to the NHTSA to open an investigation and
10 possible recall. This also affects RAV4s and Camrys from what I researched of
11 similar years in this generation. It may be an easy fix if you find the part to
12 replace but some people are recommending to replace the part + hose since it
13 may occur again.”²¹

14 n. In or around January 2024, a consumer wrote: “I recently had my check engine
15 light come on and my local toyota dealership had an offer for a free diagnostic
16 check so when I took it in they told me that the engine coolant bypass valve
17 needed to be replaced but they wanted close \$900 to fix the issue. I ended up
18 taking it to another shop that could fix it for about half the cost however after
19 the repair the check engine light is still on and I am getting a diagnostic code of
20 P26AE still. Does anyone know what might still be causing the check engine
21 light to come on even after the part was repaired? Car has around 100k miles on
22
23
24

25 ²⁰
26 https://www.reddit.com/r/rav4club/comments/14491xh/comment/k6m9zrj/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button (last visited
27 May 14, 2024)

28 ²¹
https://www.reddit.com/r/COROLLA/comments/18ojjv0/toyota_corolla_20202021_engine_coolant_bypass/ (last visited May 14, 2024)

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1 it, is running fine, no noises, has not been running hot, no leaks that I can tell of
2 either.”²²

3 o. In or around April 2024, a consumer wrote: “Mine this problem now. AC blows
4 hot along with Engine Maintenance Required message. I had called in to the
5 dealership when the message came up, and mentioned the message and they said
6 “Oh, sure. That’s just the extra reminder to tell you that you REALLY need to
7 do your oil change. I laughed at this because I had just done an oil change and
8 had reset the Maintenance Required message already. I said I would come in to
9 show them what i meant. I pointed out to the service department that this
10 message was not the same as the scheduled maintenance reminder but they
11 assured me there was nothing else wrong. Frustrated, i went home and looked it
12 up. Coolant bypass valve failure is what prompts this message, or so i gathered
13 from the web. Oddly, OBD reader showed no codes at all (?) My car didn’t
14 behave any differently besides the ding and the message as soon as i turned on
15 the AC. I read also that one can drive around with this issue for up to six months
16 (didn’t have the money to fix right away). It is maybe three weeks later and as
17 of today, the AC does not work at all. Sucks but I still don’t have the money to
18 fix it. Sigh.”²³

19 83. Further, upon information and belief, Toyota itself has seen a significant increase
20 in warranty claims relating to the Defect. The NHTSA complaints reproduced above indicate
21 that dealerships are unable to order replacement coolant bypass valves because of a significant
22 backorder.

23 ///

24 _____
25 ²²
26 [https://www.reddit.com/r/autorepair/comments/190btr4/2018_toyota_camry_coolant_bypass_valve_](https://www.reddit.com/r/autorepair/comments/190btr4/2018_toyota_camry_coolant_bypass_valve_issue/)
27 [https://www.reddit.com/r/COROLLA/comments/18ojjv0/comment/kyovah2/?utm_source=share&utm](https://www.reddit.com/r/COROLLA/comments/18ojjv0/comment/kyovah2/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button)
28 [m_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button](https://www.reddit.com/r/COROLLA/comments/18ojjv0/comment/kyovah2/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button) (last visited
May 14, 2024)

²³
[https://www.reddit.com/r/COROLLA/comments/18ojjv0/comment/kyovah2/?utm_source=share&utm](https://www.reddit.com/r/COROLLA/comments/18ojjv0/comment/kyovah2/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button)
[m_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button](https://www.reddit.com/r/COROLLA/comments/18ojjv0/comment/kyovah2/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button) (last visited
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1 84. Despite Defendants’ knowledge of the Defect, they failed to disclose it to
2 Plaintiffs and other Class Members.

3 **4. Toyota’s History of Coolant System Issues**

4 85. Toyota knew or should have known about the Defect due to the other problems
5 it has encountered with the coolant system in its vehicles.

6 86. In February of 2020, Toyota recalled approximately 44,000 vehicles because of
7 a defect that caused certain vehicles “with engine blocks containing higher porosity levels” to
8 “create cracks in the cooling passages, resulting in coolant leaking internally and/or externally.
9 *See* Exhibit 2.

10 87. Among the impacts, Toyota acknowledged leaking coolant could cause “engine
11 noise, engine smoke, warning lights/malfunction indicator illumination, and audible chime
12 sounding, and/or, in some cases, engine overheating and possible internal mechanical damage
13 (e.g. seizing of internal engine components”). Toyota further acknowledged that engine
14 overheating could cause “a vehicle stall while driving at higher speeds . . . without prior
15 warning to the driver, increasing the risk of crash” and that internal mechanical engine damage
16 could “potentially cause engine oil to leak, which, in the presence of an ignition source, can
17 lead to an increased risk of fire.”

18 88. Toyota first learned of the coolant defect in these vehicles in September of 2019.
19 Between September 2019 and January 2020, Toyota conducted testing and failure mode
20 analyses on the root cause of the defect, which led it to “conduct a voluntary safety recall
21 campaign” of the affected vehicles. The scope of the impacted vehicles includes the 2019-
22 2020 Toyota RAV4, thus alerting Toyota to coolant related issues in those vehicles as well as
23 the dangers of a coolant leak in its vehicles generally.

24 89. Toyota’s history of investigating, testing, and identifying design and/or
25 manufacturing defects contained in its vehicles establishes that Toyota knew or should have
26 known of the Defect in the Class Vehicles.

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1 **D. Toyota Conceals the Defect and Continues Selling Class Vehicles**

2 90. Toyota describes its vehicles as being quality, dependable, and reliable.²⁴

3 91. Defendants could have provided Class Vehicle owners and lessees with adequate
4 and satisfactory notice of the Defect, including through their sales and marketing
5 representations, their network of agents and dealers, in owners’ manuals, on their website, in
6 Class Vehicle brochures, and on the window stickers. Instead of notifying the public and/or
7 the Class of the Defect, Defendants actively concealed this material information and continued
8 to sell and lease Class Vehicles.

9 92. Despite Toyota’s representations of reliability and safety, the Defect prevents
10 the coolant system in the Class Vehicles from working as directed and poses a potential safety
11 hazard for Class Members who may experience engine stalling and/or engine failure if the
12 engines in the Class Vehicles overheat.

13 93. Nor has Toyota developed an effective fix for the sudden failures the Defect
14 causes. Toyota dealerships are instructed to replace the defective coolant bypass valves with
15 the same defective valves, which means that consumers will inevitably need to replace the
16 valves again in the future.

17 94. As a consequence of Toyota’s actions and inaction, Class Vehicle owners have
18 been deprived of the benefit of their bargain, lost full use of their Class Vehicles, and incurred
19 lost time and out-of-pocket costs, including payments for (1) the costs for diagnosis and (2)
20 the costs to make the necessary repairs. The Class Vehicles have also suffered a diminution in
21 value due to the Defect.

22 95. Had Plaintiffs and Class Members known about the Defect, they would not have
23 purchased or leased their Class Vehicles or would have paid significantly less for them.

24 **E. Defendants’ Warranty Practices**

25 96. In its New Vehicle Limited Warranty, Toyota agrees to repair defects reported
26 within the earlier of three years or 36,000 miles. The Warranty Information Booklet included
27

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²⁴ See, e.g., *supra* note 4, 5.

1 with all Class Vehicles provides that, “[t]his warranty covers repairs and adjustments needed
2 to correct defects in materials or workmanship of any part supplied by Toyota, subject to the
3 exceptions indicated under “What Is Not Covered” on pages 14–15.” The listed exceptions do
4 not apply here. *See* Exhibit 3.

5 97. Toyota also provides an Emission Defect Warranty, which provides coverage
6 for the earlier of two years or 24,000 miles such that the Class Vehicles were “designed, built
7 and equipped to conform at the time of sale with applicable federal emissions standards,” as
8 well as “free from defects in materials in workmanship that may cause the vehicle to fail to
9 meet these standards.” Ex 3, at 17. In addition, certain components receive coverage for the
10 earlier of eight years or 80,000 miles, including the “sensors, solenoids, switches *and valves*.”

11 Ex. 3, at 19.

12 98. Toyota evades its warranty obligations by claiming that the Defect is not a defect,
13 and thus denies warranty coverage to repair the Defect.

14 99. Moreover, some Class Vehicles manifest the Defect just outside Defendants’
15 warranty period. But the mileage and temporal limitations Defendants impose on their
16 warranty are unconscionable and unenforceable.

17 100. Defendants provide the New Vehicle Limited Warranty and Emission Defect
18 Warranty (together, the “Warranty”) to buyers after a purchase is complete. Buyers like
19 Plaintiffs and Class Members lack pre-sale knowledge of the Defect or the ability to bargain
20 as to the terms of the Defendants’ Warranty. Accordingly, the limitations Defendants impose
21 on the Warranty—and their efforts to disclaim any implied warranties—are procedurally
22 unconscionable because there was unequal bargaining power between Defendants and
23 Plaintiffs and the Class Members, because, at the time of purchase, Plaintiffs and the other
24 Class Members had no other options for purchasing from Defendants alternative warranty
25 coverage for the Class Vehicles.

26 101. All of the purported limitations on the Warranty, including the time and mileage
27 limits, are also substantively unconscionable. Defendants knew Class Vehicles suffered from
28 the Defect and that the Defect would continue to pose safety risks after the Warranty

1 purportedly expired, yet failed to disclose the Defect to Plaintiffs and the other Class Members
 2 while continuing to market Class Vehicles as dependable and reliable. Defendants'
 3 enforcement of those limitations is thus harsh and shocks the conscience.

4 102. Defendants' efforts to evade their Warranty obligations with respect to the
 5 known Defect, coupled with their refusal to cover the Defect if it manifests outside the
 6 warranty's stated term, deprives Plaintiffs and Class Members of the benefit of their bargain,
 7 forcing them to pay out of pocket to repair a defect present in Class Vehicles at the time of
 8 purchase.

9 VI. CLASS ACTION ALLEGATIONS

10 103. Plaintiffs bring this action individually and on behalf of a nationwide class
 11 pursuant to Rules 23(a), 23(b)(2), and/or 23(b)(3) of the Federal Rules of Civil Procedure.

12 Nationwide Class:

13 All persons in the United States who bought or leased a Class Vehicle.

14 104. In addition, pursuant to Fed. R. Civ. P. 23(c)(5), state subclasses are defined as
 15 follows:

16 California Subclass:

17 All persons who are: (1) current or former owners and/or lessees of a Class
 18 Vehicle; and (2) reside in California or purchased a Class Vehicle for primarily
 19 personal, family or household purposes, as defined by California Civil Code §
 1791(a), in California.

20 Florida Subclass:

21 All persons who bought or leased a Class Vehicle in the state of Florida.

22 105. Excluded from the Class are Defendants, any affiliates, employees, officers and
 23 directors; persons or entities that purchased the Class Vehicles for resale; and the Judge(s)
 24 assigned to this case. Plaintiffs reserve the right to modify, change, or expand the class
 25 definitions in light of discovery and/or further investigation.

26 106. Numerosity: The Class is so numerous that joinder of all members is
 27 impracticable. While the exact number and identities of individual members of the Class is
 28 unknown at this time, as such information is in the sole possession of Defendants and is

1 obtainable by Plaintiffs only through the discovery process, publicly available sales
2 information shows that Defendants sold or leased hundreds of thousands of Class Vehicles
3 nationwide. Members of the Class can be readily identified based upon, *inter alia*, the records
4 (including databases, e-mails, and dealership records and files) maintained by Toyota in
5 connection with its sales and leases of Class Vehicles.

6 107. **Existence and Predominance of Common Questions of Fact and Law:**

7 Common questions of law and fact exist as to all members of the Class and predominate over
8 any individual questions. These common legal and factual questions include, but are not
9 limited to:

- 10 a. whether Toyota engaged in the conduct alleged herein;
- 11 b. whether Class Vehicles are unfit for their ordinary purpose;
- 12 c. whether Toyota placed Class Vehicles into the stream of commerce in the United
13 States with knowledge of the Defect;
- 14 d. whether Toyota knew or should have known of the Defect, and if so, for how
15 long;
- 16 e. when Toyota became aware of the Defect in the Class Vehicles;
- 17 f. whether Toyota knowingly failed to disclose the existence and cause of the
18 Defect in the Class Vehicles;
- 19 g. whether Toyota's conduct alleged herein violates consumer protection laws,
20 warranty laws, and other laws as asserted herein;
- 21 h. whether Plaintiffs and Class Members overpaid for their Class Vehicles as a
22 result of the Defect;
- 23 i. whether Plaintiffs and Class Members have suffered an ascertainable loss as a
24 result of their loss of their Class Vehicles' features and functionality;
- 25 j. whether Plaintiffs and Class Members are entitled to damages, including
26 punitive damages, as a result of Toyota's conduct alleged herein, and if so, the
27 amount or proper measure of those damages; and
28

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1 k. whether Plaintiffs and Class Members are entitled to equitable relief, including
2 but not limited to restitution and/or injunctive relief.

3 108. **Typicality:** Plaintiffs’ claims are typical of the claims of the Class because the
4 Plaintiffs purchased a Class Vehicle containing the Defect, as did each member of the Class.
5 Plaintiffs and Class Members sustained economic harm in the same manner by Toyota’s
6 uniform course of conduct alleged herein. Plaintiffs and Class Members have the same or
7 similar claims against Toyota relating to the conduct alleged herein, and the same conduct on
8 the part of Toyota gives rise to all the claims for relief.

9 109. **Adequacy:** Plaintiffs are adequate representatives of the Class, whose interests
10 do not conflict with those of any other Class Member. Plaintiffs have retained counsel
11 competent and experienced in complex class action litigation—including consumer warranty
12 and automobile defect class actions—who intend to prosecute this action vigorously. The
13 interests of the Class will be fairly and adequately protected by Plaintiffs and their counsel.

14 110. **Superiority:** A class action is superior to all other available means of fair and
15 efficient adjudication of the claims of Plaintiffs and members of the Class. The injury suffered
16 by each individual Class Member is relatively small in comparison to the burden and expense
17 of individual prosecution of these claims, including from the need for expert witness testimony
18 on highly technical and economic issues bound up with the claims. Individualized litigation
19 also would risk inconsistent or contradictory judgments and increase the delay and expense to
20 all parties and the courts. By contrast, a class action presents far fewer management difficulties
21 and provides the benefits of single adjudication, economies of scale, and comprehensive
22 supervision by a single court.

23 111. **Injunctive Relief:** Toyota has acted, and refuses to act, on grounds generally
24 applicable to the Class, thereby making appropriate final equitable relief with respect to the
25 Class as a whole.

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CLAIMS FOR RELIEF

COUNT I
VIOLATION OF MAGNUSON-MOSS WARRANTY ACT (“MMWA”)
(15 U.S.C. §§ 2301 ET SEQ.)
(NATIONWIDE CLASS)

112. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

113. Plaintiffs bring this claim on behalf of themselves and the Class.

114. Plaintiffs are “consumers” within the meaning of the MMWA, 15 U.S.C. § 2301(3).

115. Toyota is a “supplier” and “warrantor” within the meaning of the MMWA, 15 U.S.C. § 2301(4)-(5).

116. The Class Vehicles are “consumer products” within the meaning of the MMWA, 15 U.S.C. § 2301(1).

117. 15 U.S.C. § 2310(d) provides a cause of action for any consumer who is damaged by the failure of a warrantor to comply with a written or implied warranty.

118. Toyota’s express warranties are written warranties within the meaning of the MMWA, 15 U.S.C. § 2301(6). The Class Vehicles’ implied warranties are covered under the MMWA, 15 U.S.C. § 2301(7).

119. Toyota breached its express and implied warranties as described in more detail above. Without limitation, the Class Vehicles contain the Defect, which renders the vehicles unsafe and unfit for their intended use. Toyota refused to honor its warranties by repairing or replacing the defective components.

120. Toyota directly communicated with Plaintiffs via its television, print, and online advertisements. Toyota also issued vehicle warranties directly to Plaintiffs. Plaintiffs and other Class Members also relied on Toyota’s direct representations regarding the high quality, durability, reliability, dependability, and functionality of Toyota vehicles in making their purchasing decision.

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1 121. Plaintiffs afforded Toyota a reasonable opportunity to cure its breach of written
2 warranties and any further opportunity would be unnecessary and futile here as Toyota has
3 failed to remedy the Defect.

4 122. At the time of sale or lease of each Class Vehicle, Toyota knew, should have
5 known, or was reckless in not knowing of its misrepresentations and omissions concerning the
6 Class Vehicles’ inability to perform as warranted, but it nonetheless failed to fix the Defect
7 and/or disclose the Defect. Under the circumstances, the remedies available under any
8 informal settlement procedure would be inadequate, and any requirement that Plaintiffs resort
9 to an informal dispute resolution procedure under the MMWA and/or afford Toyota a
10 reasonable opportunity to cure its breach of warranties is excused and thereby deemed
11 satisfied.

12 123. The amount in controversy of Plaintiffs’ individual claims meets or exceeds the
13 sum of \$25. The amount in controversy of this action exceeds the sum of \$50,000, exclusive
14 of interest and costs, computed on the basis of all claims to be determined in this lawsuit.

15 124. Plaintiffs individually and on behalf of the other Class Members, seeks all
16 damages permitted by law, including diminution in value of the Class Vehicles, in an amount
17 to be proven at trial.

18 **COUNT II**
19 **BREACH OF EXPRESS WARRANTY**
(NATIONWIDE CLASS OR, ALTERNATIVELY, THE STATE SUBCLASSES)

20 125. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
21 though fully set forth herein.

22 126. Plaintiffs bring this claim individually and on behalf of the State Subclasses.

23 127. Toyota is a “merchant” as defined under the Uniform Commercial Code
24 (“UCC”).

25 128. The Class Vehicles are “goods” as defined under the UCC.

26 129. Toyota provides a Limited Warranty and Emission Defect Warranty (together,
27 the “Warranty”) with every Class Vehicle that expressly warrants that Toyota will repair any
28 defects in materials and/or workmanship free of charge during the applicable warranty periods.

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1 The Defect is a defect in material and/or workmanship, and therefore should have been
2 repaired at no cost under the Warranty. Further, the Defect causes increased emissions, and
3 thus violates the Emission Defect Warranty because the vehicle does not conform with federal
4 emissions standard.

5 130. Toyota breached its written warranties by failing to provide an adequate repair
6 when Plaintiffs and the Class Members presented their Class Vehicles to authorized Toyota
7 dealers following manifestation of the Defect. Despite its knowledge that Plaintiffs' and Class
8 Members' vehicles were exhibiting the symptoms of the Defect, instead of providing an
9 effective repair, Toyota claimed that the necessary repairs would not be covered under
10 Warranty.

11 131. Toyota failed to perform its Warranty obligations as part of a uniform pattern
12 and practice that extended to all of its dealerships.

13 132. The Warranties formed the basis of the bargain that was reached when Plaintiffs
14 and Class Members purchased or leased their Class Vehicles. Plaintiffs and Class Members
15 experienced the Defect within or shortly after the warranty period and presented their Class
16 Vehicles for repairs. Despite the existence of the Warranties, Toyota failed to inform Plaintiffs
17 and Class Members of the Defect and failed to adequately repair the Defect.

18 133. As a result of Toyota's breach of its express warranty, Plaintiffs and Class
19 Members have suffered economic damages including, but not limited to, the loss of the benefit
20 of their bargain, loss of vehicle use, diminished value, substantial loss in value and resale
21 value, out-of-pocket expenses for maintenance and service expenses to fix the Defect, as well
22 as towing, roadside assistance, and alternative transportation costs that they otherwise would
23 not have incurred but for the Defect.

24 134. Toyota was provided notice of the issues complained of herein within a
25 reasonable time by numerous complaints online, directly to Toyota and its authorized dealers,
26 Class Members taking their vehicles to its dealers, and by direct written notice by Plaintiff
27 Barrientos.
28

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1 135. Plaintiffs and Class Members have complied with all obligations under the
2 Warranty or otherwise have been excused from performance of such obligations as a result of
3 Toyota’s conduct described herein.

4 136. In its capacity as a supplier and/or warrantor, and by the conduct described
5 herein, any attempt by Toyota to limit its express warranty in a manner that would exclude or
6 limit coverage for the Defect, including benefit-of-the-bargain, incidental, or consequential
7 damages, would cause the warranty to fail of its essential purpose. Plaintiffs and Class
8 Members have presented their Class Vehicles to Toyota’s authorized dealers and Toyota has
9 failed to remedy the Defect. As a result, Plaintiffs and Class Members are left with defective
10 vehicles that do not function as intended and, therefore, have been deprived of the benefit of
11 their bargains.

12 137. In its capacity as a supplier and/or warrantor, and by the conduct described
13 herein, any attempt by Toyota to limit its Warranty in a manner that would exclude or limit
14 coverage for the Defect would be unconscionable. Toyota’s Warranties were adhesive and did
15 not permit negotiations. Toyota possessed superior knowledge of the Defect, which is a latent
16 defect, prior to offering Class Vehicles for sale. Toyota concealed and did not disclose this
17 Defect, and Toyota did not remedy the Defect prior to sale (or afterward).

18 **COUNT III**
19 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
(NATIONWIDE CLASS OR, ALTERNATIVELY, THE STATE SUBCLASSES)

20 138. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
21 though fully set forth herein.

22 139. Plaintiffs bring this claim individually and on behalf of the State Subclasses.

23 140. Toyota is a “merchant” as defined under the UCC.

24 141. The Class Vehicles are “goods” as defined under the UCC.

25 142. A warranty that the Class Vehicles were in merchantable quality and condition
26 arises by operation of law with respect to transactions for the purchase and lease of Class
27 Vehicles. Toyota impliedly warranted that the Class Vehicles were of good and merchantable
28 condition and quality, fit for their ordinary intended use, including with respect to safety,

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1 reliability, operability, and the absence of material defects, and that the vehicles would pass
2 without objection in the automotive trade.

3 143. The Class Vehicles, when sold and leased, and at all times thereafter, were not
4 in merchantable condition or fit for the ordinary purpose for which vehicles are used. The
5 Class Vehicles were not merchantable in that the Defect causes the closed-loop coolant
6 systems in the Class Vehicles to fail to function as intended and excepted, and allows the
7 engines in the Class Vehicles to overheat.

8 144. The Defect was present in the Class Vehicles when they were placed into the
9 stream of commerce and inevitably manifests well before the end of the useful life of the Class
10 Vehicles.

11 145. Toyota was provided notice of the issues complained of herein within a
12 reasonable time by numerous complaints online, directly to Toyota and its authorized dealers,
13 Class Members taking their vehicle to its dealers, and by direct written notice by Plaintiff
14 Barrientos on May 24, 2024.

15 146. In its capacity as a supplier and/or warrantor, and by the conduct described
16 herein, any attempt by Toyota to limit its express warranty in a manner that would exclude or
17 limit coverage for the Defect would be unconscionable. Toyota’s warranties were adhesive
18 and did not permit negotiations. Toyota possessed superior and exclusive knowledge of the
19 Defect, which is a latent defect, prior to offering Class Vehicles for sale. Toyota concealed
20 and did not disclose this Defect, and Toyota did not remedy the Defect prior to sale (or
21 afterward).

22 147. As a direct and proximate result of the breach of these warranties, Plaintiffs and
23 Class Members were injured and are entitled to damages.

24 **COUNT IV**
25 **VIOLATIONS OF THE SONG-BEVERLY CONSUMER WARRANTY ACT**
26 **FOR BREACH OF IMPLIED WARRANTY**
27 **CAL. CIV. CODE §§ 1790-1795.8**
28 **(CALIFORNIA SUBCLASS)**

29 148. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
though fully set forth herein.

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1 149. Plaintiff Barrientos and the California Subclass members who purchased or
2 leased the Class Vehicles are “buyers” within the meaning of Cal. Civ. Code. § 1791(b).

3 150. The class vehicles are “consumer goods” within the meaning of Cal. Civ. Code
4 § 1791(a).

5 151. Toyota is a “manufacturer” of the Class Vehicles within the meaning of Cal. Civ.
6 Code § 1791(j).

7 152. Toyota impliedly warranted to Plaintiff Barrientos and the California Subclass
8 members that Class Vehicles were “merchantable” within the meaning of Cal. Civ. Code §§
9 1791.1(a) & 1792.

10 153. Section 1791.1(a) provides that: “Implied warranty of merchantability” or
11 “implied warranty that goods are merchantable” means that the consumer goods must meet
12 each of the following:

- 13 (1) Pass without objection in the trade under the contract description.
- 14 (2) Are fit for the ordinary purposes for which such goods are used.
- 15 (3) Are adequately contained, packaged, and labeled.
- 16 (4) Conform to the promises or affirmations of fact made on the container or
17 label.

18 154. The Defect in the Class Vehicles is present in them when sold and substantially
19 certain to manifest. The Class Vehicles would not pass without objection in the automotive
20 trade because the Defect causes the coolant systems to malfunction and leak and to fail to
21 operate as intended. The Defect thus affects the central functionality of coolant systems,
22 leading to expensive repair costs, inconvenient servant calls, and also causes the engine to
23 wear prematurely.

24 155. Because the Defect prevents Class Members from accessing the rear of the
25 vehicle, the Class Vehicles are not fit for the ordinary purposes for which such vehicles are
26 used.

27 156. Class Vehicles are not adequately labeled because the labeling fails to disclose
28 the Defect and does not advise the California Subclass members of this Defect.

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1 157. Any attempt by Toyota to disclaim its implied warranty obligations under the
2 Song-Beverly Act is ineffective due to its failure to adhere to Sections 1792.3 and 1792.4.
3 Those sections of the Civil Code provide that, in order to validly disclaim the implied warranty
4 of merchantability, a manufacturer must “in simple and concise language” state each of the
5 following: “(1) The goods are being sold on an ‘as is’ or ‘with all faults’ basis. (2) The entire
6 risk as to the quality and performance of the goods is with the buyer. (3) Should the goods
7 prove defective following their purchase, the buyer and not the manufacturer, distributor, or
8 retailer assumes the entire cost of all necessary servicing or repair.” Cal. Civ. Code § 1792.4(a).
9 Toyota’s attempted implied warranty disclaimer does not conform to these requirements.

10 158. The Defect deprived Plaintiff Barrientos and the California Subclass members of
11 the benefit of their bargain and resulted in Class Vehicles being worth less than what Plaintiff
12 Barrientos and other California Subclass members paid.

13 159. As a direct and proximate result of Toyota’s breach of its implied warranties,
14 Plaintiff Barrientos and California Subclass members received goods that contain a defect that
15 substantially impairs their value. Plaintiff Barrientos and the California Subclass members
16 have been damaged by the diminished value of the vehicles, the vehicles’ malfunctioning, out-
17 of-pocket costs incurred, and actual and potential increased maintenance and repair costs.

18 160. Under Cal. Civ. Code §§ 1791.1(d) & 1794, Plaintiff Barrientos and California
19 Subclass members are entitled to damages and other legal and equitable relief, including, *inter*
20 *alia*, benefit-of-the-bargain damages, overpayment or diminution in value of their Class
21 Vehicles, and reasonable attorneys’ fees and costs.

22 **COUNT V**
23 **VIOLATIONS OF THE CALIFORNIA CONSUMERS LEGAL REMEDIES ACT**
24 **“CLRA”**
CAL. CIV. CODE §§ 1750–1785
(CALIFORNIA SUBCLASS)

25 161. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
26 though fully set forth herein.

27 162. Plaintiff Barrientos and the members of the California Subclass are “consumers”
28 as defined under the CLRA. See Cal. Civ. Code § 1761(d).

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1 163. Toyota is a “person” as defined under the CLRA. See Cal. Civ. Code § 1761(c).

2 164. Class Vehicles are “goods” as defined under the CLRA. See Cal. Civ. Code §
3 1761(a).

4 165. The CLRA proscribes “unfair methods of competition and unfair or deceptive
5 acts or practices undertaken by any person in a transaction intended to result or which results
6 in the sale or lease of goods or services to any consumer.” Cal. Civ. Code § 1770(a).

7 166. Toyota engaged in unfair and deceptive acts in violation of the CLRA by the
8 practices described above and by knowingly and intentionally concealing from Plaintiff
9 Barrientos and the California Subclass members that the Class Vehicles suffer from the Defect
10 (and the costs, risks, and diminished value of the Class Vehicles as a result of this Defect).

11 Toyota’s conduct violated at least the following enumerated CLRA provisions:

- 12 a. Toyota represented that the Class Vehicles have characteristics, uses, or benefits
13 that they do not have, which is in violation of section 1770(a)(5);
- 14 b. Toyota represented that the Class Vehicles are of a particular standard, quality,
15 or grade when, in fact, they are not, which is in violation of section 1770(a)(7);
- 16 c. Toyota advertises its Class Vehicles with the intent not to sell them as advertised,
17 which is in violation of section 1770(a)(9);
- 18 d. Toyota represents that its Class Vehicles have been supplied in accordance with
19 a previous representation when they have not, which is in violation of section
20 1770(a)(16); and
- 21 e. Toyota inserts an unconscionable provision into its warranty in violation of
22 section 1770(a)(19).

23 167. Toyota’s unfair or deceptive acts or practices occurred repeatedly in its trade or
24 business and were capable of deceiving a substantial portion of the purchasing public.

25 168. Toyota knew, should have known, or was reckless in not knowing that the Class
26 Vehicles were defective, would fail prematurely, and were not suitable for their intended use.

27 169. Toyota was under a duty to Plaintiff Barrientos and the California Subclass
28 members to disclose the defective nature of the Class Vehicles and the Defect because:

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- 1 a. Toyota knew of but actively concealed the Defect from Plaintiff Barrientos and
- 2 the California Subclass;
- 3 b. Toyota was in a superior and exclusive position to know the true facts about the
- 4 Defect, which affects the central functionality of the vehicle and poses safety
- 5 concerns, and Plaintiff Barrientos and the Subclass members could not
- 6 reasonably have been expected to discover that the Class Vehicles contained the
- 7 Defect until it manifested, which Toyota knew; and
- 8 c. Toyota made partial representations regarding the reliability, safety, and quality
- 9 but suppressed material facts regarding the Defect.

10 170. The facts that Toyota misrepresented to and concealed from Plaintiff Barrientos
11 and the other California Subclass members are material because a reasonable consumer would
12 have considered them to be important in deciding whether to purchase their Class Vehicles or
13 pay a lesser price for them.

14 171. The Defect poses a serious safety defect and affects the central functionality of
15 a vehicle because it renders the vehicle inoperable.

16 172. In failing to disclose the material Defect, Toyota has knowingly and
17 intentionally concealed material facts in breach of its duty to disclose.

18 173. Plaintiff Barrientos and the California Subclass have suffered injury in fact and
19 actual damages resulting from Toyota’s material misrepresentations and omissions, including
20 by paying an inflated purchase price for their Class Vehicles and incurring additional out-of-
21 pocket expenses to deal with the Defect. Had Plaintiff Barrientos and the Subclass known
22 about the defective nature of the Class Vehicles and the Defect, they would not have purchased
23 or leased their Class Vehicles or would have paid less in doing so.

24 174. As a direct and proximate result of Toyota’s unfair and deceptive conduct,
25 therefore, Plaintiff Barrientos and the California Subclass members have been harmed.

26 175. Pursuant to Cal. Civ. Code § 1782(a), Plaintiff Barrientos sent a letter to Toyota
27 notifying it of its CLRA violations on May 24, 2024 and providing them with an opportunity
28 to correct their business practices. If Toyota does not correct its business practices, Plaintiff

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1 will amend (or seek leave to amend) the complaint to add claims for monetary relief, including
2 for actual, restitutionary, and punitive damages under the CLRA.

3 176. Pursuant to Cal. Civ. Code § 1780(a), Plaintiff Barrientos, individually and on
4 behalf of the California Subclass, seeks injunctive relief for Toyota’s violation of the CLRA.

5 177. Additionally, pursuant to Cal. Civ. Code §§ 1780 and 1781, Plaintiff Barrientos,
6 individually and on behalf of the California Subclass, seeks compensatory and punitive
7 damages under the CLRA and to recover their attorneys’ fees and costs.

8 178. Plaintiff Barrientos’ CLRA venue declaration is attached as an exhibit to this
9 complaint in accordance with Cal. Civ. Code § 1780(d).

10 **COUNT VI**
11 **VIOLATIONS OF THE CALIFORNIA UNFAIR COMPETITION LAW (“UCL”)**
12 **CAL. BUS. & PROF. CODE §§ 17200–17210**
13 **(CALIFORNIA SUBCLASS)**

14 179. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
15 though fully set forth herein.

16 180. The UCL proscribes acts of unfair competition, including “any unlawful, unfair
17 or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising.”
18 Cal. Bus. & Prof. Code § 17200. Toyota’s conduct violates each of these prohibitions.

19 **Unlawful Conduct**

20 181. Toyota’s conduct is unlawful, in violation of the UCL, because, as set forth
21 herein, it violates the Song–Beverly Consumer Warranty Act, the MMWA, and the CLRA.

22 **Unfair Conduct**

23 182. Toyota’s conduct is unfair because it violated California public policy,
24 legislatively declared in the Song–Beverly Consumer Warranty Act, which requires a
25 manufacturer to ensure that goods it places on the market are fit for their ordinary and intended
26 purposes.

27 183. Toyota acted in an immoral, unethical, oppressive, and unscrupulous manner, in
28 at least the following respects:

///
///

- 1 a. Selling Plaintiff Barrientos and California Subclass members defective Class Vehicles;
- 2
- 3 b. Failing to disclose the Defect despite the opportunity to do so in numerous locations that people in the market for a vehicle would be likely to encounter;
- 4
- 5 c. Directing and furnishing replacement parts it knew would not adequately remedy the defect, and repairing defective parts with more defective parts and otherwise failing to adequately remedy the Defect during the warranty period;
- 6
- 7 d. Refusing to repair or replace the Class Vehicles when the known Defect manifested outside the warranty period;
- 8
- 9 e. Failing to exercise adequate quality control and due diligence over the Class Vehicles before placing them on the market; and
- 10
- 11 f. Failing to acknowledge the scope and severity of the Defect, refusing to acknowledge the Class Vehicles are defective, and failing to provide adequate relief to Plaintiff Barrientos and California Subclass members.

12 184. The gravity of the harm resulting from Toyota's unfair conduct outweighs any potential utility of the conduct. The practice of selling defective Class Vehicles without providing an adequate remedy to cure the Defect harms the public at large and is part of a common and uniform course of wrongful conduct.

13 185. There are reasonably available alternatives that would further Toyota's business interests of increasing sales and preventing false warranty claims. For example, Toyota could have: (a) acknowledged the Defect and provided a permanent, effective fix for the Defect; and/or (b) disclosed the Defect prior to prospective consumers' purchases.

14 186. The harm from Toyota's unfair conduct was not reasonably avoidable by consumers. The Class Vehicles all suffer from the Defect, and Toyota has failed to disclose it. Plaintiff Barrientos and California Subclass members did not know of, and had no reasonable means of discovering, the Defect.

15 **Fraudulent Conduct**

16 187. Toyota's conduct is fraudulent in violation of the UCL. Toyota's fraudulent acts include knowingly and intentionally concealing from Plaintiff Barrientos and the California Subclass members the existence of the Defect and falsely marketing and misrepresenting the Class Vehicles as being functional and not possessing a defect that would cause the coolant bypass valves to fail.

1 188. Toyota's misrepresentations and omissions alleged herein caused Plaintiff
2 Barrientos and the California Subclass members to purchase or lease their Class Vehicles or
3 pay more than they would have had Toyota disclosed the Defect.

4 189. At all relevant times, Toyota had a duty to disclose the Defect because it had
5 superior and exclusive knowledge of the Defect, which affects the central functionality of the
6 vehicle and creates a safety risk for drivers and passengers, and because Toyota made partial
7 representations about the reliability, quality, and safety of the Class Vehicles but failed to fully
8 disclose the Defect.

9 190. Accordingly, Plaintiff Barrientos and California Subclass members have
10 suffered injury in fact, including lost money or property, as a result of Toyota's unlawful,
11 unfair, and fraudulent acts. Absent these acts, Plaintiff Barrientos and California Subclass
12 members would not have purchased or leased their Class Vehicles at the prices they paid or
13 would not have purchased or leased them at all.

14 191. Plaintiff Barrientos seeks appropriate relief under the UCL, including such
15 orders as may be necessary: (a) to enjoin Toyota from continuing its unlawful, unfair, and
16 fraudulent acts or practices, and (b) to restore Plaintiff Barrientos and California Subclass
17 members any money Toyota acquired by its unfair competition, including restitution. Plaintiff
18 Barrientos also seeks reasonable attorneys' fees and expenses.

19 **COUNT VII**
20 **FRAUDULENT CONCEALMENT**
21 **(NATIONWIDE CLASS OR, ALTERNATIVELY, THE STATE SUBCLASSES)**

22 192. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
23 though fully set forth herein.

24 193. Toyota made material omissions concerning a presently existing or past fact in
25 violation of the common law. Toyota did not fully and truthfully disclose to its customers the
26 true nature of the Defect. A reasonable consumer could not have discovered the existence of
27 the Defect in their Class Vehicle prior to purchasing it.

28 194. Toyota made these omissions with knowledge of their falsity and with the intent
that Plaintiffs and Class Members rely upon them.

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1 195. The facts concealed, suppressed, and not disclosed by Toyota to Plaintiffs and
2 Class Members are material in that a reasonable consumer would have considered them to be
3 important in deciding whether to purchase or lease Class Vehicles at all or at the offered price.

4 196. Toyota had a duty to disclose the true quality and reliability of the Class Vehicles
5 because the knowledge of the Defect and its details were known and/or accessible only to
6 Toyota; Toyota had superior knowledge and access to the relevant facts; and Toyota knew the
7 facts were not known to, or reasonably discoverable by, Plaintiffs and Class Members. Toyota
8 also had a duty to disclose because it made many affirmative representations about the qualities
9 and reliability of its vehicles, including references as to safety and general operability, as set
10 forth above, which were misleading, deceptive, and incomplete without the disclosure of the
11 additional facts set forth above regarding the actual reliability of their vehicles.

12 197. Had Plaintiffs and the Class known about the defective nature of the Class
13 Vehicles, they would not have purchased or leased the Class Vehicles or would have paid less
14 in doing so. Thus, Plaintiffs and the other Class Members were fraudulently induced to lease
15 or purchase Class Vehicles containing the Defect.

16 198. Plaintiffs and Class Members reasonably relied on Toyota’s material omissions
17 and suffered damages as a result. Toyota’s conduct was willful, wanton, oppressive,
18 reprehensible, and malicious. Consequently, Plaintiffs and Class Members are entitled to an
19 award of punitive damages.

20 **COUNT VIII**
21 **VIOLATIONS OF THE FLORIDA DECEPTIVE AND UNFAIR TRADE**
22 **PRACTICES ACT**
23 **(FLA. STAT. §§ 501.201-501.213)**
24 **(FLORIDA SUBCLASS)**

25 199. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
26 though fully set forth herein.

27 200. Plaintiff Foerst brings this claim individually and on behalf of the Florida
28 Subclass.

201. Plaintiff Foerst and Florida Subclass members are “consumers” within the
meaning of Fla. Stat. § 501.203(7).

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1 202. The Florida Deceptive and Unfair Trade Practices Act (“FDUTPA”) prohibits
2 “[u]nfair methods of competition, unconscionable acts or practices, and unfair or deceptive
3 acts or practices in the conduct of any trade or commerce.” Fla. Stat. § 501.204(1). Defendants
4 engaged in unfair and deceptive practices that violated the FDUTPA as described above.

5 203. Defendants engaged in “trade or commerce” within the meaning of the
6 FDUTPA. See Fla. Stat. § 501.203(8).

7 204. Defendants caused to be made or disseminated through Florida and the United
8 States, through advertising, marketing and other publications, statements that were untrue or
9 misleading, and which were known, or which by the exercise of reasonable care should have
10 been known to Defendants, to be untrue and misleading to consumers, including Plaintiff
11 Foerst and the other Florida Class Members and otherwise engaged in activities with a
12 tendency or capacity to deceive.

13 205. In violation of the FDUTPA, Defendants employed unfair and deceptive acts or
14 practices, fraud, false pretense, misrepresentation, or concealment, suppression or omission of
15 a material fact with intent that others rely upon such concealment, suppression or omission, in
16 connection with the sale and/or lease of Class Vehicles. Defendants knowingly concealed,
17 suppressed and omitted material facts regarding the Defect and misrepresented the standard,
18 quality, or grade of the Class Vehicles, which directly caused harm to Plaintiff Foerst and the
19 Florida Class.

20 206. Defendants actively suppressed the fact that Class Vehicles contain the Defect
21 and present a safety hazard because of materials, workmanship, design, and/or manufacturing
22 defects. Further, Defendants employed unfair and deceptive trade practices by failing to
23 provide repairs of the Defect or replacement of Class Vehicles due to the Defect within a
24 reasonable time in violation of the FDUTPA. Defendants also breached their warranties as
25 alleged above in violation of the FDUTPA.

26 207. As alleged above, Defendants have known of the Defect contained in the Class
27 Vehicles for years. Prior to selling and leasing the Class Vehicles, Defendants knew or should
28 have known the Class Vehicles contained the Defect due to pre-production testing, quality

1 control audits, and failure mode analysis. Defendants also should have known of the Defect
2 from the early complaints and service requests they received from Class Members and dealers,
3 from their own investigation and issuance of service bulletins, technical tips and recalls, from
4 repairs and/or replacements of the coolant bypass valves and component parts, and from other
5 internal sources. Defendants, nevertheless, failed to disclose and actively concealed the
6 dangers and risks posed by the Class Vehicles and the Defect.

7 208. Defendants' unfair and deceptive trade practices were likely intended to deceive
8 a reasonable consumer. Plaintiff Foerst and members of the Florida Class had no reasonable
9 way to know that the Class Vehicles contained the Defect were defective in workmanship
10 and/or manufacture and posed a serious and significant safety risk. Defendants possessed
11 superior knowledge as to the quality and characteristics of the Class Vehicles, including the
12 Defect within their vehicles and its associated safety risks, and any reasonable consumer would
13 have relied on Defendants' misrepresentations and omissions, as Plaintiff Foerst and members
14 of the Florida Class did.

15 209. Defendants intentionally and knowingly misrepresented material facts and
16 omitted material facts regarding the Class Vehicles and the Defect present in Class Vehicles
17 with an intent to mislead Plaintiff Foerst and the Florida Class.

18 210. Defendants knew or should have known that their conduct violated the
19 FDUTPA.

20 211. Defendants owed Plaintiff Foerst and the Florida Class a duty to disclose the true
21 safety and reliability of the Class Vehicles and the existence of the Defect because Defendants:

- 22 a. Possessed exclusive knowledge of the Defect;
- 23 b. Intentionally concealed the foregoing from Plaintiff Foerst and the Florida Class;
- 24 and/or
- 25 c. Made incomplete representations about the safety and reliability of the foregoing
26 facts generally, while purposefully withholding material facts from Plaintiff
27 Foerst and the Florida Class that contradicted these representations, inter alia,
28 that a Defect existed at the time of sale or lease.

1 212. Plaintiff Foerst and the other Florida Class Members have suffered an injury in
 2 fact, including the loss of money or property, as a result of Defendants' unfair, unlawful, and/or
 3 deceptive practices. In purchasing or leasing their Class Vehicles, Plaintiff Foerst and the other
 4 Florida Class Members relied on the misrepresentations and/or omissions of Defendants with
 5 respect to the safety and reliability of the Class Vehicles. Defendants' representations were
 6 untrue because the Class Vehicles are distributed with defective coolant bypass valves that fail
 7 prematurely. Had Plaintiff Foerst and the other Florida Class Members known of the Defect,
 8 they would not have purchased or leased their Class Vehicles and/or paid as much for them.
 9 Accordingly, Plaintiff Foerst and the other Florida Class Members overpaid for their Class
 10 Vehicles and did not receive the benefit of their bargain.

11 213. All of the wrongful conduct alleged herein occurred, and continues to occur, in
 12 the conduct of Defendants' businesses. Defendants' wrongful conduct is part of a pattern or
 13 generalized course of conduct that is still perpetuated and repeated, both in the state of Florida
 14 and nationwide.

15 214. Plaintiff Foerst, individually and on behalf of the other Florida Class Members,
 16 request that this Court enter such orders or judgments as may be necessary to enjoin
 17 Defendants from continuing their unfair, unlawful, and/or deceptive practices and to provide
 18 declaratory relief, attorneys' fees, and any other just and proper relief available under the
 19 FDUTPA.

20 **COUNT IX**
 21 **UNJUST ENRICHMENT**
 22 **IN THE ALTERNATIVE TO PLAINTIFFS' CLAIMS AT LAW**
 23 **(NATIONWIDE CLASS OR, ALTERNATIVELY, THE STATE SUBCLASSES)**

24 215. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
 25 though fully set forth herein.

26 216. This claim is pleaded in the alternative to the other claims set forth herein.

27 217. As the intended and expected result of its conscious wrongdoing, Toyota has
 28 profited and benefited from the purchase and lease of Class Vehicles that contain the Defect.

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1 218. Toyota has voluntarily accepted and retained these profits and benefits, knowing
2 that, as a result of its misconduct alleged herein, Plaintiffs and the Class were not receiving
3 Class Vehicles of the quality, nature, fitness, reliability, safety, or value that Toyota had
4 represented and that a reasonable consumer would expect. Plaintiffs and the Class Members
5 expected that when they purchased or leased a Class Vehicle, it would not contain a Defect
6 that renders the coolant system inoperative.

7 219. Toyota has been unjustly enriched by its deceptive, wrongful, and unscrupulous
8 conduct and by its withholding of benefits and unearned monies from Plaintiffs and the Class
9 rightfully belonging to them.

10 220. Equity and good conscience militate against permitting Toyota to retain these
11 profits and benefits from its wrongful conduct. They should accordingly be disgorged or
12 placed in a constructive trust so that Plaintiffs and Class Members can obtain restitution.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Plaintiffs, on behalf of themselves and all others similarly situated,
15 request that this Court enter an Order against Toyota providing for the following:

- 16 A. Certification of the proposed Class and/or Subclass, appointment of
17 Plaintiffs and their counsel to represent the Class, and provision of notice
18 to the Class;
- 19 B. An order permanently enjoining Toyota from continuing the unlawful,
20 deceptive, fraudulent, and unfair business practices alleged in this
21 Complaint;
- 22 C. Injunctive relief in the form of a recall or free replacement program;
- 23 D. Equitable relief, including in the form of buy back of the Class Vehicles;
- 24 E. Costs, restitution, damages, including punitive damages, penalties, and
25 disgorgement in an amount to be determined at trial;
- 26 F. An Order requiring Toyota to pay pre- and post-judgment interest as
27 provided by law;
- 28 G. An award of reasonable attorneys' fees and costs as permitted by law; and

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H. Such other or further relief as may be appropriate.

Dated: May 31, 2024

NYE, STIRLING, HALE, MILLER & SWEET, LLP

By: /s/ Alison M. Bernal

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Attorneys for Plaintiffs and the Proposed Classes

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial for all claims so triable.

Dated: May 31, 2024

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Tech Tip T-TT-0699-22

July 08, 2022

Subject "Engine Maintenance Required" Message - Scan for DTCs		Market USA
Service Category Engine/Hybrid System	Section Cooling	
Applicability MY18-21 Models with A25A/M20A engines		

APPLICABLE VEHICLES

2018-2021	Avalon HV	2018-2021	Highlander HV
2018-2021	RAV4	2018-2021	Camry
2019-2020	Corolla Hatchback	2018-2021	RAV4 HV
2018-2021	Corolla	2018-2021	Camry HV
2018-2021	Avalon	2021	Sienna HV

CONDITION

Some Model Year 2018-2021 vehicles equipped with A25A-FKS/FXS or M20A-FKS/FXS engines may display the following message "Engine Maintenance Required Visit Your Dealer" on the combination meter.



Figure 1. Subject combination meter message.

RECOMMENDATIONS

1. If this message is displayed, please check for DTCs.
2. Proceed with the repair recommended in the repair manual for the DTC.

LINK REFERENCES

This Tech Tip does not contain any link references

TOYOTA

Toyota Motor North America, Inc.

Vehicle Safety & Compliance
Liaison Office
Mail Stop: W4-2D
6565 Headquarters Drive
Plano, TX 75024

February 6, 2020

DEFECT INFORMATION REPORT

1. Vehicle Manufacturer Name:

Toyota Motor Manufacturing Canada Inc. ["TMMC"]
1055 Fountain Street North, Cambridge, Ontario, Canada N3H 5K2

Toyota Motor Manufacturing, Kentucky, Inc. ["TMMK"]
1001 Cherry Blossom Way Georgetown, KY 40324

Affiliated U.S. Sales Company:

Toyota Motor North America, Inc. ["TMNA"]
6565 Headquarters Drive, Plano, TX 75024

Manufacturer of Engine Block

Toyota Bodine Aluminum, Inc.
301 James Lawrence Rd, Jackson, TN 38301
Telephone: 731-265-5500

Country of Origin: U.S.A.

2. Identification of Involved Vehicles and Affected Components:

Based on production records, we have determined the involved vehicle population as in the table below.

Make/Car Line	Model Year	Manufacturer	Production Period
Toyota / Avalon HV	2020	TMMK	September 16, 2019 through December 13, 2019
Toyota / Camry	2020	TMMK	September 12, 2019 through January 15, 2020
Toyota / Camry HV	2020	TMMK	September 16, 2019 through December 19, 2019
Toyota / RAV4	2019-2020	TMMC	September 12, 2019 through November 20, 2019
Toyota / RAV4 HV	2019-2020	TMMC, TMMK	September 12, 2019 through December 10, 2019
Lexus / ES300h	2020	TMMK	September 16, 2019 through December 18, 2019

Applicability	Part Number	Part Name	Component Description
MY2020 Toyota Avalon HV	11410-F0013	Cylinder Block Assembly	Engine Block
MY2020 Toyota Camry / Camry HV	11410-F0013		
MY2019-2020 Toyota RAV4 / RAV4 HV	11410-F0013 11410-F0023		
MY2020 Lexus ES300h	11410-F0013		

Note: (1) Although the involved vehicles are within the above production period range, not all vehicles in this range were sold in the U.S.

(2) Other Toyota or Lexus vehicles sold in the U.S. are not equipped with an engine assembly containing an engine block produced at the specific plant during the specific production period.

3. Total Number of Vehicles Potentially Involved:

Toyota Avalon HV	:	664
Toyota Camry	:	2,609
Toyota Camry HV	:	2,864
Toyota RAV4	:	30,515
Toyota RAV4 HV	:	6,405
Lexus ES300h	:	1,134
Total	:	44,191

4. Percentage of Vehicles Estimated to Actually Contain the Defect:

Less than 0.5%. Of the involved vehicles, approximately 250 vehicles received engine blocks that were produced under the conditions described below. Whether the issue in each case will lead to engine overheating or internal mechanical engine damage that can cause a non-hybrid vehicle stall or lead to a thermal event, depends on casting porosity condition of the engine block during production and each vehicle's operating environment.

5. Description of Problem:

The subject vehicles are equipped with a 2.5L 4 Cylinder engine (A25A) and may have been produced with engine blocks containing higher porosity levels. Higher levels of porosity could create cracks in the cooling passages, resulting in coolant leaking internally and/or externally. This may lead to engine noise, engine smoke, warning lights/malfunction indicator illumination, an audible chime sounding, and/or, in some cases, engine overheating and possible internal mechanical engine damage (e.g. seizing of internal engine components). If engine overheating or internal mechanical engine damage were to occur on involved conventional gasoline vehicles, a vehicle stall while driving at higher speeds could occur without prior warning to the driver, increasing the risk of crash. For hybrid and conventional gasoline vehicles, the internal mechanical engine damage can potentially cause engine oil to leak, which, in the presence of an ignition source, can lead to an increased risk of fire.

6. Chronology of Principal Events:September 2019 - October 2019

In early September 2019, it was observed that a water flow meter that regulates die cooling failed and caused the die temperature to increase during engine block production. The flow meter was

replaced, and some suspect blocks were contained at the engine block plant. Engine assembly plants receiving the suspect blocks produced engine assemblies with the suspect blocks and identified no abnormalities. The produced engine assemblies and the contained engine blocks were then released for shipment.

In late September, Toyota identified a vehicle with an external coolant leak at a vehicle plant. The vehicle was inspected and the leak was observed to be coming from the engine block. The vehicle was contained and the engine was recovered for further investigation by the engine block plant.

In mid October, Toyota conducted an inspection of a vehicle at a dealer after the dealer identified, during a pre-delivery inspection, that coolant leaked into the crankcase and contaminated the engine oil. Based on the initial observation by the service technician, there was no sign of coolant present in the cooling system. Further, the technician reported that, after adding coolant and pressurizing the system, coolant leaked into the engine oil pan. The engine was recovered and sent for continued investigation to the engine block plant. The engine was determined to be from the same production period as the flow meter failure.

Through October, Toyota conducted testing on engines, identified at Toyota manufacturing facilities to have engine blocks from the suspect production period, to further investigate coolant leaks. Cut checks were done to understand the leak origin, and signs of porosity were observed in the engine blocks. Internal cracks were also observed in the cooling passages and oil return passages. Toyota hypothesized that these could be caused by abnormal cooling during the casting process.

As a water flow meter malfunction could impact cooling during the casting process, Toyota conducted a duplication trial to understand the effect on the casting process when a water flow meter fails as it did in early September at the engine block plant. During the trial, Toyota observed that an increased die temperature could occur due to lack of cooling in the casting process which could create cracks in the cooling passage(s) and lead to a coolant leak. As a result of this investigation, Toyota began a quality confirmation activity to contain potentially affected engine blocks and assemblies within Toyota's control and requested contained parts be recovered for further investigation. Toyota then began further analysis to identify the potential effect of these manufacturing conditions on assembled engines.

November 2019 - Mid Jan 2020

Toyota conducted four durability tests using engines that were assembled with engine blocks from the suspect production period. The test conditions included running the engine at a higher speed (higher RPM) over a long period of time to model a severe driving condition. The results of three of the durability tests were that one engine had an internal leak, one engine had an external leak, and one engine had no leaks. One of the four durability tests that was conducted had a mechanical failure during the testing, suggesting the possibility of engine stall. A further inspection of this engine found that a connecting rod had broken and created a hole in the engine. While the durability testing produced a mechanical engine failure involving an engine assembly produced with a suspect engine block, it was unclear if this outcome could potentially occur in the field.

Toyota initiated a failure mode analysis of the potential consequences of different levels of coolant leaks resulting from different levels of potential engine block porosity. In addition, Toyota began a part recovery activity to attempt to understand the varying levels of porosity of the engine block that may exist in the field. While its analysis continued, Toyota determined that it could not rule out the possibility that engines assemblies in the field (containing the suspect engine blocks) could experience the aforementioned mechanical engine failure, potentially resulting in a vehicle stall while driving at higher speeds or an oil could leak that could increase the risk of fire.

January 29, 2020

Based on the results of the above investigation, Toyota decided to conduct a voluntary safety recall campaign for the vehicles identified above.

Based on a diligent review of records, Toyota's best engineering judgement is that there are 7 Toyota Field Technical Reports and 4 warranty claims that have been received from U.S. sources that relate or may relate to this condition and which were considered in the decision to submit this report. In some cases, multiple reports were completed for one potential incident.

7. Description of Corrective Repair Action:

For all involved vehicles, Toyota and Lexus dealers will inspect the engine block casting serial number to determine if it is involved. In the cases where an involved engine block is identified, dealers will replace the engine including the engine block with a new one at no cost to customers.

Reimbursement Plan for pre-notification remedies

As the owner notification letters will be mailed out well within the active period of the Toyota New Vehicle Limited Warranty (“Warranty”), all involved vehicle owners for this recall would have been provided a repair at no cost under Toyota’s Warranty.

8. Recall Schedule:

Notifications to owners of the affected vehicles will occur by early April, 2020. A copy of the draft owner notification will be submitted as soon as it is available.

9. Distributor/Dealer Notification Schedule:

Notifications to distributors/dealers were sent on February 6, 2020. Copies of dealer communications will be submitted as they are issued.

10. Manufacturer’s Campaign Number:

	<u>Interim</u>	<u>Final</u>
Toyota:	20TB04	20TA04
Lexus:	20LB02	20LA02

WARRANTY & MAINTENANCE GUIDE



2020

Thank you for purchasing a Toyota vehicle. We know you have many options when considering which vehicle to buy, and we appreciate your decision to select Toyota.

We want you to enjoy owning your Toyota as much as you enjoy driving it. This booklet is designed to help. Here you'll find information on Toyota's warranty coverage and maintenance recommendations for your vehicle. There are two easy-to-follow sections: one for warranty and one for maintenance. The tab on the side of each page identifies the section you are in.

For more information about our vehicles, our company or the products and services available for your vehicle, please visit Toyota's official Web site, **www.toyota.com**.

We wish you many miles of safe and pleasurable driving, and we look forward to serving you in the years ahead. Welcome to the Toyota family!



TOYOTA

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FIND IT ONLINE

To update your contact information and vehicle ownership status, please visit **www.toyota.com/ownerupdate**. Your vehicle's VIN will be required to start the update process.

You may also enroll to receive the following useful information and benefits at **toyota.com/owners**:

- Access to Owner's Manuals and Maintenance Guides
- View Your Vehicle's Service History
- Explore How-to videos and more



Owners

At Toyota, our top priority is always our customers. We know your Toyota is an important part of your life and something you depend on every day. That's why we're dedicated to building products of the highest quality and reliability.

Our excellent warranty coverage is evidence that we stand behind the quality of our vehicles. We're confident — as you should be — that your Toyota will provide you with many years of enjoyable driving.

To further demonstrate our commitment to our customers' satisfaction, occasionally we may establish a special policy adjustment to pay for specific repairs that are no longer covered by warranty. When we establish such a policy adjustment, we mail details to all applicable owners we have on record. That's why it's important to send in the card at the back of this booklet if you change your address or if you've purchased this vehicle from a previous owner.

To provide you with added protection against unexpected service costs, we offer Toyota Financial Services vehicle service agreements and Toyota Auto Care and Toyota Care Plus pre-paid maintenance programs. Each offers plans to meet a wide variety of needs. Your dealership can help you select the plan that's best for you.

Our goal is for every Toyota customer to enjoy outstanding quality, dependability and peace of mind throughout their ownership experience. We want you to be a satisfied member of the Toyota family for many miles to come.

This booklet describes the terms of Toyota warranty coverage as well as general owner responsibilities. The scheduled maintenance section describes your vehicle's maintenance requirements. Be sure to review this information carefully, since proper maintenance is required to ensure that warranty coverage remains intact.

All information in this booklet is the latest available at the time of publication and is subject to change without notice.

Both Toyota and your Toyota dealer are dedicated to serving your automotive needs. Your complete satisfaction is our first priority. Should you have a problem or concern — either during or after the warranty period — please take the following steps to ensure the quickest possible response:

Step 1

Discuss the situation with a dealership manager, such as the service manager or customer relations manager. In most cases, a satisfactory solution can be reached at this step.

Step 2

If the dealership does not address your concern to your satisfaction, call the Toyota Customer Experience Center at **(800) 331-4331**.

Please have the following information ready when you call:

- Your Toyota's vehicle identification number (located on the driver's side corner of the dashboard, under the windshield)
- Current mileage on your vehicle
- Name of your Toyota dealership

A Toyota customer relations representative will assist you in working with the dealership to find a satisfactory solution.

Step 3

If your concern has still not been resolved to your satisfaction, Toyota offers additional assistance through the Dispute Settlement Program, a dispute resolution program administered by the National Center for Dispute Settlement. The purpose of the Dispute Settlement Program is to resolve disputes through arbitration — a process by which two parties authorize an independent third party to hear and resolve a dispute. The program is informal and free of charge. To request that your case be reviewed through the program, complete the customer claim form in the *Owner's Warranty Rights Notification* booklet (found in your glove box) and mail it to:

National Center for Dispute Settlement
P.O. Box 688
Mt. Clemens, MI 48046

To initiate arbitration, you must complete an NCDS customer claim form and mail it to NCDS. To request a form, call NCDS at (800) 777-8119 or obtain a copy at www.ncdsusa.org. When you call, please have your vehicle identification number, the current mileage on your Toyota and the names of your selling and servicing dealerships.

IF YOU NEED ASSISTANCE

INTRODUCTION

California residents: Toyota offers your assistance through an informal dispute settlement program called the California Dispute Settlement Program (CDSP). A brochure about the program is found in your glove box. For additional information, call the Toyota Customer Experience Center at (800) 331-4331. You may also contact the CDSP directly at (888) 300-6237. Failure to use the CDSP may affect your rights and remedies under California's "Lemon Laws."

This information about the Dispute Settlement Programs is correct as of the date of printing. However, the programs may be changed without notice. For the most current information about the programs, call the Toyota Customer Experience Center at (800) 331-4331.

THE NEW WORLD OF ANTI-THEFT TECHNOLOGY

This Toyota vehicle may be equipped with an electronic “immobilizer” anti-theft system. When the key is inserted into the ignition switch it transmits an electronic code to an immobilizer computer. The engine will only start if the code in the key matches the code in the immobilizer. If the code does not match, the immobilizer disables the ignition and fuel systems. While an exact physical copy of the key will open the door and allow retrieval of items locked in the vehicle, it won’t start the vehicle unless the key has the same code as the immobilizer.

SECURITY

For security purposes, access to key codes and service procedures for electronically registering replacement keys is restricted. Only a Toyota dealer or certain bonded/registered independent locksmiths can generate replacement keys.

THE IMMOBILIZER KEY

REPLACING THE KEY

Upon purchase, each vehicle should have two master keys and an aluminum tag with a key-code imprinted on it.

To generate a fully functional replacement key (one that will both open the doors and start the engine), one of the master keys is required. To make a key that will open the door for retrieval of items locked inside the vehicle, the aluminum key-code tag can be used. If a master key or the aluminum key-code tag is not available, a Toyota dealer or certain registered locksmiths can obtain the key code from a restricted-access database. These businesses can also access a service utility to reprogram the immobilizer if all registered master keys have been lost. If a Toyota dealer is not available, please refer to www.aloa.org to find a bonded/registered locksmith who performs high-security key service.

KEEPING THE KEY SAFE

Replacing an immobilizer key may be costly. It is advisable to keep a spare master key and the aluminum key-code tag in a safe place. If you record the key-code in more than one place, do not record it in a way that can be easily identified and associated with the vehicle. It is wise to keep a copy of the key-code outside of the vehicle.

If the vehicle was delivered with less than two keys and the aluminum key-code tag, consider having the Toyota dealer or a qualified independent automotive locksmith make a duplicate key before you need it.

We realize that your confidence in the quality and reliability of our products was a key factor in your decision to buy a Toyota. We also know how disruptive the loss of transportation can be to your daily routine. That's why we're pleased to offer you the benefits of our Transportation Assistance Policy.

Under this policy, you are eligible for transportation assistance if your Toyota must be kept overnight for warranty-covered repairs. The policy applies when your vehicle must be kept overnight for any of the following reasons:

- The warranty repairs will take longer than one day to complete.
- The warrantable condition requires extensive diagnosis.
- The parts needed for the warranty repairs are not readily available and your vehicle is inoperative or unsafe to drive.

The policy does not apply when warranty repairs can be completed in one day but the vehicle must be kept overnight due to dealer or owner scheduling conflicts.

The Transportation Assistance Policy applies for the duration of the New Vehicle Limited Warranty. The policy applies to all 2020 model-year Toyotas sold and serviced by authorized Toyota dealerships in the mainland United States and Alaska.

For further details, please consult your Toyota dealer.

GENERAL WARRANTY PROVISIONS

Important: You must use the Dispute Settlement Program (or, in California, the CDSP) before seeking remedies through a court action pursuant to the Magnuson-Moss Warranty Act (the “Act”). However, if you choose to pursue rights and remedies not created by the Act, you are not required to use the Dispute Settlement Program (CDSP). You may also be required to use the Dispute Settlement Program or CDSP before seeking remedies under the “Lemon Laws” of your state. Please check this booklet and the appropriate page of the *Owner’s Warranty Rights Notification* booklet for additional information and the requirements applicable to your state.

Who Is the Warrantor

The warrantor for these limited warranties is Toyota Motor Sales, U.S.A., Inc. (“Toyota”), a California corporation, P.O. Box 259001, Plano, Texas 75025-9001.

Which Vehicles Are Covered

These warranties apply to all 2020 model-year RAV4 vehicles distributed by Toyota that are originally sold by an authorized dealer in the United States and normally operated or touring in the United States, U.S. territories or Canada. Warranty coverage is automatically transferred at no cost to subsequent vehicle owners.

Multiple Warranty Conditions

This booklet contains warranty terms and conditions that may vary depending on the part covered. A warranty for specific parts or systems, such as the Powertrain Warranty or Emission Performance Warranty, is governed by the coverage set forth in that warranty as well as the General Warranty Provisions.

When Warranty Begins

The warranty period begins on the vehicle’s in-service date, which is the first date the vehicle is either delivered to an ultimate purchaser, leased, or used as a company car or demonstrator.

Repairs Made at No Charge

Repairs and adjustments covered by these warranties are made at no charge for parts and labor.

Parts Replacement

Any needed parts replacement will be made using new or remanufactured parts. The decision whether a part should be repaired or replaced will be made by the servicing Toyota dealership and/or Toyota. Parts scheduled to be replaced as required maintenance are warranted until their first replacement only.

Informal Dispute Settlement Program

Toyota offers assistance through an informal dispute settlement program called the **Dispute Settlement Program**. This program is administered by an independent third party:

National Center for Dispute Settlement
P.O. Box 688
Mt. Clemens, MI 48046

Further information about this program can be found in this booklet and the *Owner's Warranty Rights Notification* booklet.

California residents: Toyota offers you assistance through an informal dispute settlement program called the California Dispute Settlement Program (CDSP). A brochure about the program is found in your glove box. For additional information, call the Toyota Customer Experience Center at (800) 331-4331. You may also contact the CDSP directly at (888) 300-6237. Failure to use the CDSP may affect your rights and remedies under California's "Lemon Laws."

Limitations

The performance of necessary repairs and adjustments is the exclusive remedy under these warranties or any implied warranties. Toyota does not authorize any person to create for it any other obligation or liability in connection with this vehicle.

Any implied warranty of merchantability or fitness for a particular purpose is limited to the duration of these written warranties. Some states do not allow restrictions on how long an implied warranty lasts, so this limitation may not apply to you.

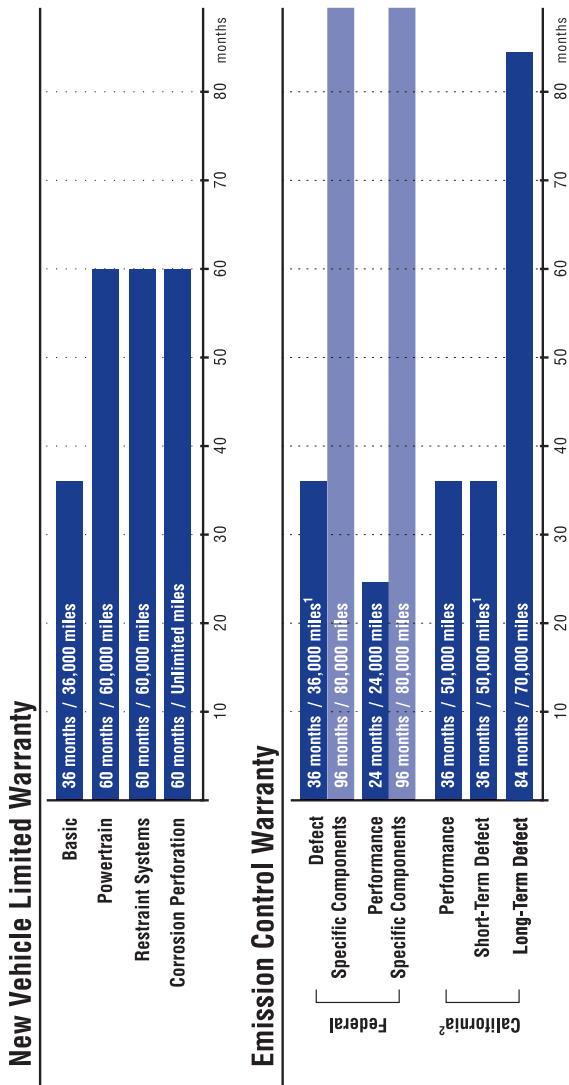
Your Rights Under State Law

These warranties give you specific legal rights. You may also have other rights that vary from state to state.

GENERAL WARRANTY PROVISIONS

WARRANTY

WARRANTY COVERAGE AT A GLANCE



WHAT IS COVERED AND HOW LONG

Basic Warranty

This warranty covers repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, subject to the exceptions indicated under “What Is Not Covered” on pages 14–15.

Coverage is for 36 months or 36,000 miles, whichever occurs first, with the exception of wheel alignment and wheel balancing, which are covered for 12 months or 12,000 miles, whichever occurs first.

Powertrain Warranty

This warranty covers repairs needed to correct defects in materials or workmanship of any component listed below and in the next column and supplied by Toyota, subject to the exceptions indicated under “What Is Not Covered” on pages 14–15.

Coverage is for 60 months or 60,000 miles, whichever occurs first.

Engine

Cylinder block and head and all internal parts, timing gears and gaskets, timing chain/belt and cover, flywheel, valve covers, oil pan, oil pump, engine mounts, turbocharger housing and all internal parts, supercharger housing and all internal parts, engine control computer, water pump, fuel pump, seals and gaskets.

Transmission and Transaxle

Case and all internal parts, torque converter, clutch cover, transmission mounts, transfer case and all internal parts, engine control computer, seals and gaskets.

Front-Wheel-Drive System

Final drive housing and all internal parts, axle shafts, drive shafts, constant velocity joints, front hub and bearings, seals and gaskets.

Rear-Wheel-Drive System

Axle housing and all internal parts, propeller shafts, U-joints, axle shafts, drive shafts, bearings, supports, seals and gaskets.

Restraint Systems Warranty

This warranty covers repairs needed to correct defects in materials or workmanship of any seatbelt or air bag system supplied by Toyota, subject to the exceptions indicated under “What Is Not Covered” on pages 14–15.

Coverage is for 60 months or 60,000 miles, whichever occurs first.

For vehicles sold and registered in the state of Kansas, the warranty for seatbelts and related components is 10 years, regardless of mileage.

NEW VEHICLE LIMITED WARRANTY**Corrosion Perforation Warranty**

This warranty covers repair or replacement of any original body panel that develops perforation from corrosion (rust-through), subject to the exceptions indicated under “What Is Not Covered” on pages 14–15.

Coverage is for 60 months, regardless of mileage.

For information on how to protect your vehicle from corrosion, refer to sections related to maintenance and care in the *Owner's Manual*.

Towing

When your vehicle is inoperable due to failure of a warranted part, towing service to the nearest authorized Toyota dealership is covered.

WHAT IS NOT COVERED

This warranty does not cover damage or failures resulting directly or indirectly from any of the following:

- Fire, accidents or theft
- Abuse or negligence
- Misuse—for example, racing or overloading
- Improper repairs
- Alteration or tampering, including installation of non-Genuine Toyota Accessories
- Lack of or improper maintenance, including use of fluids and fuel other than those specified in the *Owner's Manual*
- Installation of non-Genuine Toyota Parts
- Airborne chemicals, tree sap, road debris (including stone chips), rail dust, salt, hail, floods, wind storms, lightning and other environmental conditions
- Water contamination

This warranty also does not cover the following:

Tires

Tires are covered by a separate warranty provided by the tire manufacturer. See page 29.

Normal Wear and Tear

Noise, vibration, cosmetic conditions and other deterioration caused by normal wear and tear.

Maintenance Expense

Normal maintenance services such as:

- Engine tune-ups
- Replacement of fluids and filters
- Lubrication
- Cleaning and polishing
- Replacement of spark plugs and fuses
- Replacement of worn wiper blades, brake pads/linings and clutch linings

Vehicles with Altered Odometer

Failure of a vehicle on which the odometer has been altered so that actual vehicle mileage cannot be readily determined.

Salvage or Total-Loss Vehicles

Any vehicle that has ever been issued a “salvage” title or similar title under any state’s law, or has ever been declared a “total loss” or equivalent by a financial institution or insurer, such as by payment for a claim in lieu of repairs because the cost of repairs exceeded the cash value of the vehicle. This exclusion does not apply to the emission control warranties, including Emission Control Warranty Enhancements or any open Safety Recalls/SSCs/LSCs.

Incidental Damages

Incidental or consequential damages associated with a vehicle failure. Such damages include but are not limited to inconvenience; the cost of transportation, telephone calls and lodging; the loss of personal or commercial property; and the loss of pay or revenue.

Disclaimer of Extra Expenses and Damages

The performance of necessary repairs and adjustments is the exclusive remedy under this warranty or any implied warranty. Toyota does not authorize any person to create for it any other obligation or liability in connection with this vehicle. Toyota shall not be liable for incidental or consequential damages resulting from breach of this written warranty or any implied warranty. Any implied warranty of merchantability or fitness for a particular purpose is limited to the duration of this written warranty, except in states where this limitation is not allowed.

NEW VEHICLE LIMITED WARRANTY

DISPUTE RESOLUTION

If a dispute arises regarding your warranty coverage, please follow the steps described under “If You Need Assistance” on page 5. Please note that you must use the Dispute Settlement Program (or, in California, the CDSP) before seeking remedies through a court action pursuant to the Magnuson-Moss Warranty Act. You may also be required to use the Dispute Settlement Program or CDSP before seeking remedies under the “Lemon Laws” of your state. Please check the appropriate page of the *Owner’s Warranty Rights Notification* booklet (located in your glove box) for the requirements applicable to your state.

WHAT IS COVERED AND HOW LONG

Emission Defect Warranty

Toyota warrants that your vehicle:

- Was designed, built and equipped to conform at the time of sale with applicable federal emissions standards.
- Is free from defects in materials and workmanship that may cause the vehicle to fail to meet these standards.

Federal regulations require that this warranty be in effect for two years or 24,000 miles from the vehicle's in-service date, whichever occurs first. However, under the terms of the Basic Warranty, Toyota provides coverage of three years or 36,000 miles, whichever occurs first. Specific components may have longer coverage under the terms of the Powertrain Warranty. Additionally, components marked "8/80" in the parts list on pages 18–19 have coverage of eight years or 80,000 miles, whichever occurs first.

Emission Performance Warranty

Some states and localities have established vehicle inspection and maintenance (I/M) programs to encourage proper vehicle maintenance. If an EPA-approved I/M program is in force in your area, you are eligible for Emission Performance Warranty coverage.

Under the terms of the Emission Performance Warranty and federal regulations, Toyota will make all necessary repairs if both of the following occur:

- Your vehicle fails to meet applicable emissions standards as determined by an EPA-approved emissions test.
- This failure results or will result in some penalty to you — such as a fine or denial of the right to use your vehicle — under local, state or federal law.

This warranty is in effect for two years or 24,000 miles from the vehicle's in-service date, whichever occurs first. Additionally, components marked "8/80" in the parts list on pages 18–19 have coverage of eight years or 80,000 miles, whichever occurs first.

WHAT IS NOT COVERED

These warranty obligations do not apply to failures or noncompliance caused by:

- The use of replacement parts not certified in accordance with aftermarket parts certification regulations.
- The use of replacement parts not equivalent in quality or design to original equipment parts.

Provisions under the “What Is Not Covered” section of the New Vehicle Limited Warranty also apply to this warranty.

WARRANTY PARTS LIST

Air/Fuel Metering System

- Air/fuel ratio feedback control system
- Cold-start enrichment system
- Deceleration control system
- Electronic fuel injection system components
 - Airflow sensor
 - Engine control module (8/80)
 - Throttle body
 - Other components

Air Induction System

- Intake manifold and intake air surge tank

Catalyst System

- Catalytic converter and protector (8/80)
- Constricted fuel filler neck
- Exhaust manifold
- Exhaust pipe (manifold to catalyst and/or catalyst to catalyst)

Evaporative Control System

- Charcoal canister
- Diaphragm valve
- Fuel filler cap
- Fuel tank
- Vapor liquid separator

8/80 = Covered for eight years or 80,000 miles, whichever occurs first.

Exhaust Gas Recirculation (EGR) System

- EGR gas temperature sensor
- EGR valve
- Associated parts

Ignition System

- Ignition coil and ignitor
- Ignition wires
- Spark plugs*

Positive Crankcase Ventilation (PCV) System

- Oil filler cap
- PCV valve or orifice

Other Parts Used in Above Systems

- Data link connector (8/80)
- Hoses, clamps, fittings, tubing and mounting hardware
- Malfunction indicator light and bulb (8/80)
- Pulleys, belts and idlers
- Sealing gaskets and devices
- Sensors, solenoids, switches and valves

MAINTENANCE

You are responsible for performance of the required maintenance indicated in the *Owner's Manual* and this booklet. Toyota will not deny a warranty claim solely because you do not have records to show that you maintained your vehicle. However, any failure or noncompliance caused by lack of maintenance is not covered by this warranty.

When maintenance and repairs are paid for by you, these services may be performed by you or by any automotive service provider you choose. Toyota will not deny a warranty claim solely because you used a service provider other than a Toyota dealership for maintenance and repairs. However, any failure or noncompliance caused by improper maintenance or repairs is not covered by this warranty.

* Warranted until first required maintenance under terms of the California Emission Control Warranty.
8/80 = Covered for eight years or 80,000 miles, whichever occurs first.

REPLACEMENT PARTS

To ensure optimum performance and maintain the quality built into your vehicle's emission control systems, Toyota recommends the use of Genuine Toyota Parts when servicing or repairing the systems.

Warranty coverage is not dependent upon the use of any particular brand of replacement parts and you may elect to use non-Genuine Toyota Parts for maintenance and repairs. However, use of replacement parts that are not equivalent in quality to Genuine Toyota Parts may impair the effectiveness of the emission control systems.

If you use replacement parts that have maintenance or replacement schedules different from those of Genuine Toyota Parts, you must follow the maintenance and replacement schedules for the parts you are using. In addition, you should ensure that such parts are warranted by their manufacturers to be equivalent to Genuine Toyota Parts.

IF YOUR VEHICLE FAILS AN EMISSIONS TEST

If your vehicle fails an EPA-approved emissions test, you may make a claim under the Emission Performance Warranty. To do so, take your vehicle to an authorized Toyota dealership and present a copy of the emissions test report. Also, take your maintenance records in case they are needed.

If your claim qualifies for coverage, the dealership will repair your vehicle within 30 days (unless a shorter period is required by law). If your claim is denied, Toyota will notify you in writing of the reason within the same period. If we fail to do so, we will repair your vehicle free of charge. The only exceptions allowed are when you request or agree to a delay, or when a delay is caused by factors beyond the control of Toyota or the dealership.

For information on how to obtain service under the Emission Defect Warranty, see page 32, "Obtaining Warranty Service."

IF YOU HAVE QUESTIONS

If you have questions or concerns about your federal emission warranty coverage, please refer to “If You Need Assistance” on page 5. In the case of the Emission Performance Warranty, you may also request information from or report complaints to:

U.S. Environmental Protection Agency
Vehicle Programs & Compliance Division
(6405J)

Attn: Warranty Complaints
401 M Street SW
Washington, D.C. 20460

Vehicles equipped with a California Certified Emission Control System that are registered and operated in California or any state that adopts California emission warranty provisions are also covered by the California Emission Control Warranty (see page 23). Currently, Connecticut, Delaware, Maine, Maryland, Massachusetts, New Jersey, New York, Oregon, Pennsylvania, Rhode Island, Vermont and Washington are the other states to which the California Emission Control Warranty applies.

DEALER CERTIFICATE

We (the dealership) want you to know that at the time your new Toyota vehicle is being delivered:

- 1) On the basis of written notification furnished by Toyota, we have knowledge that the vehicle is covered by an EPA Certificate of Conformity.
- 2) We have visually inspected those emission control devices or portions thereof that are visible without removing or adjusting any components or systems, emissions-related or otherwise. On the basis of this inspection, there are no apparent deficiencies in the installation of emission control devices by Toyota. (For purposes of this certificate, "emission control devices" is limited to devices installed on a vehicle for the sole or primary purpose of controlling emissions and which were not in general use before 1968.)
- 3) We have performed all emission control system preparations required by Toyota prior to the sale of the vehicle as set forth in Toyota's current pre-delivery service manual.
- 4) Except as may be provided in Paragraph 5, if this vehicle fails an EPA-approved emissions test within three months or 4,000 miles (whichever comes first) of delivery to the ultimate purchaser, and the vehicle has been maintained and used in accordance with the written instructions for proper maintenance

and use, Toyota will remedy the nonconformity free of charge under the terms of the Emission Performance Warranty.

- 5) If the vehicle was used as a company car or demonstrator, check the box and complete the following:

- The vehicle with which this statement is delivered was placed into service as a company car or demonstrator prior to delivery. The Emission Performance Warranty period commenced on the date the vehicle was first placed into service, which was:

Month	Day	Year
-------	-----	------

NOTE: The dealership makes no representation or warranty that the emission control system or any part thereof is without defect or that the system will perform properly. The Emission Performance Warranty referred to in Paragraph 4 and furnished with the vehicle is solely that of the manufacturer.

This statement is required by section 207 of the Clean Air Act (42 U.S.C. 7541) and the EPA regulations issued thereunder.

Dealership Name

Vehicles equipped with a California Certified Emission Control System that are registered and operated in California or any state that adopts California emission warranty provisions are covered by this warranty. Currently, Connecticut, Delaware, Maine, Maryland, Massachusetts, New Jersey, New York, Oregon, Pennsylvania, Rhode Island, Vermont and Washington are the other states to which this warranty applies. Vehicles covered by this warranty are also covered by the Federal Emission Control Warranty (see page 17).

YOUR WARRANTY RIGHTS AND OBLIGATIONS

The California Air Resources Board (CARB) and Toyota are pleased to explain the emission control system warranty for your 2020 vehicle. In California, new motor vehicles must be designed, built and equipped to meet the state's stringent anti-smog standards. CARB regulations require that Toyota must warrant the emission control system on your vehicle for the time periods indicated on the next page, provided there has been no abuse, neglect or improper maintenance of your vehicle.

Your emission control system may include parts such as the fuel injection system, ignition system, catalytic converter and engine computer. Also included may be hoses, belts, connectors and other emissions-related assemblies.

Where a warrantable condition exists, Toyota will repair your vehicle at no cost to you, including diagnosis, parts and labor.

MANUFACTURER'S WARRANTY COVERAGE

- 1) For three years or 50,000 miles, whichever occurs first:
 - If your vehicle fails a smog-check test, all necessary repairs and adjustments will be made by Toyota to ensure that your vehicle passes the test. This is your Emission Control System PERFORMANCE WARRANTY.
 - If an emissions-related part listed on pages 18–19 is defective, the part will be repaired or replaced by Toyota. This is your SHORT-TERM Emission Control System DEFECT WARRANTY. Specific components may have longer coverage under the terms of the Powertrain Warranty.
- 2) For seven years or 70,000 miles, whichever occurs first:
 - If an emissions-related part listed on page 25 is defective, the part will be repaired or replaced by Toyota. This is your LONG-TERM Emission Control System DEFECT WARRANTY.

OWNER'S WARRANTY RESPONSIBILITIES

You are responsible for performance of the required maintenance indicated in the *Owner's Manual* and this booklet. Toyota recommends that you retain all receipts covering maintenance on your vehicle, but Toyota cannot deny warranty coverage solely for the lack of receipts or your failure to ensure the performance of all scheduled maintenance.

You are responsible for presenting your vehicle to a Toyota dealership as soon as a problem exists. The warranty repairs should be completed in a reasonable amount of time, not to exceed 30 days.

You should also be aware that Toyota may deny you warranty coverage if your vehicle or a part has failed due to abuse, neglect, improper maintenance or unapproved modifications.

If you have any questions regarding your warranty rights and responsibilities, you should contact the Toyota Customer Experience Center at (800) 331-4331 or the California Air Resources Board, Mobile Source Control Division, at 9528 Telstar Avenue, Suite 4, El Monte, CA 91731, (800) 242-4450.

WHAT IS NOT COVERED

These warranty obligations do not apply to failures or noncompliance caused by:

- The use of replacement parts not certified in accordance with aftermarket parts certification regulations.
- The use of replacement parts not equivalent in quality or design to original equipment parts.

Provisions under the “What Is Not Covered” section of the New Vehicle Limited Warranty also apply to this warranty.

PARTS LIST: LONG-TERM EMISSION DEFECT WARRANTY

The parts listed here are covered for seven years or 70,000 miles from the vehicle’s in-service date, whichever occurs first.

Air/Fuel Metering System

- Cam timing control motor
- Engine control computer (engine control module)
- Fuel delivery pipe
- Fuel pressure sensor
- High pressure fuel pump
- Throttle body

Air Induction System

- Intake manifold

Catalyst System

- Exhaust front pipe (including catalytic converter)
- Exhaust manifold (including manifold converter)

EGR System

- EGR cooler

Evaporative Control System

- Charcoal canister
- Fuel sub tank
- Fuel tank

Ignition System

- Knock sensor

Other Parts Used in Systems Listed

- Transmission solenoid
- Wire transmission (including temperature sensor)

MAINTENANCE

You are responsible for performance of the required maintenance indicated in the *Owner's Manual* and this booklet. Toyota will not deny a warranty claim solely because you do not have records to show that you maintained your vehicle. However, any failure or noncompliance caused by lack of maintenance is not covered by this warranty.

When maintenance and repairs are paid for by you, these services may be performed by you or by any automotive service provider you choose. Toyota will not deny a warranty claim solely because you used a service provider other than a Toyota dealership for maintenance and repairs. However, any failure or noncompliance caused by improper maintenance or repairs is not covered by this warranty.

REPLACEMENT PARTS

To ensure optimum performance and maintain the quality built into your vehicle's emission control systems, Toyota recommends the use of Genuine Toyota Parts when servicing or repairing the systems.

Warranty coverage is not dependent upon the use of any particular brand of replacement parts and you may elect to use non-Genuine Toyota Parts for maintenance and repairs. However, use of replacement parts that are not equivalent in quality to Genuine Toyota Parts may impair the effectiveness of the emission control systems.

If you use replacement parts that have maintenance or replacement schedules different from those of Genuine Toyota Parts, you must follow the maintenance and replacement schedules for the parts you are using. In addition, you should ensure that such parts are warranted by their manufacturers to be equivalent to Genuine Toyota Parts.

IF YOUR VEHICLE FAILS A SMOG-CHECK TEST

If your vehicle fails a smog-check test, you may make a claim under the Emission Performance Warranty. To do so, take your vehicle to an authorized Toyota dealership and present a copy of the smog-check test report. Also, take your maintenance records in case they are needed.

If your claim qualifies for coverage, the dealership will repair your vehicle within 30 days (unless a shorter period is required by law). If your claim is denied, Toyota will notify you in writing of the reason within the same period. If we fail to do so, we will repair your vehicle free of charge. The only exceptions allowed are when you request or agree to a delay, or when a delay is caused by factors beyond the control of Toyota or the dealership.

For information on how to obtain service under the Emission Defect Warranty, see page 32, "Obtaining Warranty Service."

REPAIR DELAYS

If a Toyota dealership is unable to complete repairs on your vehicle within 30 days, you may have the repairs made under Toyota's provisions for emergency warranty repairs. See page 32 for details.

CALIFORNIA EMISSION CONTROL WARRANTY

IF YOU HAVE QUESTIONS

If you have questions or concerns about your vehicle's California emission warranty coverage, please follow the steps described under "If You Need Assistance" on page 5. You may also request information from or report complaints to:

California Air Resources Board
Mobile Source Control Division
9528 Telstar Avenue
Suite 4
El Monte, CA 91731
(800) 242-4450

OBTAINING WARRANTY SERVICE

All tires supplied as original equipment on new Toyota vehicles are warranted by the individual tire manufacturer only, and not Toyota. Coverages by individual tire manufacturers may vary.

If you wish to obtain a hard copy of the terms of the tire warranty offered by the tire manufacturer, please contact the tire manufacturer directly, or contact Toyota at:

Toyota Customer Experience Center
Toyota Motor Sales U.S.A., Inc.
P.O. Box 259001
Plano, Texas 75025-9001
Ph: (800) 331-4331

ORIGINAL EQUIPMENT TIRE MANUFACTURERS

BF Goodrich

P.O. Box 19001
Greenville, SC 29062
(877) 788-8899
www.bfgoodrichtires.com

Bridgestone/Firestone

200 4th Avenue South
Nashville, TN 37201
Bridgestone: (800) 847-3272
Firestone: (800) 356-4644
www.bridgestone.com
www.firestonetire.com

Continental Tire of North America

1800 Continental Blvd.
Charlotte, NC 28273
(800) 847-3349
www.continentaltire.com

Dunlop Tires

1144 East Market Street
Akron, OH 44316
(800) 321-2136
www.dunloptires.com

Goodyear Tire and Rubber Co.

1144 East Market Street
Akron, OH 44316
(800) 321-2136
www.goodyear.com

Hankook Tire America Corporation

1450 Valley Road
Wayne, NJ 07470
(800) 426-5665
www.hankooktire.com

Maxxis International – USA

545 Old Peachtree Road
Suwanee, GA 30024
(800) 462-9947
www.maxxis.com

Michelin North America

P.O. Box 19001
Greenville, SC 29602
(800) 847-3435
www.michelinman.com

Nitto Tire U.S.A. Inc.

P.O. Box 6064
Cypress, CA 90630
(888) 529-8200
www.nittotire.com

Pirelli Tire LLC

100 Pirelli Drive
Rome, GA 30161
(800) 747-3554
www.pirelli.com

Toyo Tire U.S.A Corporation

P.O. Box 6052
Cypress, CA 90630
(800) 442-8696
www.toyotires.com

Yokohama Tire Corporation

1 MacArthur Place, Suite 800
Santa Ana, CA 92707
(800) 722-9888
www.yokohamatire.com

OPERATION AND MAINTENANCE

GENERAL INFORMATION

You are responsible for ensuring that your Toyota is operated and maintained according to the instructions in the *Owner's Manual* and this booklet.

You should keep detailed records of vehicle maintenance, since under some circumstances they may be required for warranty coverage. These records should include date of service, mileage at time of service and a description of service performed and/or parts installed. For your convenience, a maintenance log is included in this booklet. If you sell your vehicle, you should give your maintenance records to the new owner.

Toyota will not deny a warranty claim solely because you do not have records to show that you maintained your vehicle. However, damage or failure caused by lack of proper maintenance is not covered under warranty.

WHERE TO GO FOR MAINTENANCE

You may have maintenance performed on your vehicle by any qualified person or facility. However, Toyota recommends having maintenance performed by an authorized Toyota dealership.

Toyota dealership technicians are specially trained to maintain and repair Toyota vehicles. They stay current on the latest service information through Toyota technical bulletins, service publications and training courses. Many are also certified through the Toyota Certification Program, which involves a series of rigorous written examinations. Feel free to ask any Toyota dealership to show you their technicians' credentials.

You can be confident you're getting the best possible service for your vehicle when you take it to a Toyota dealership.

REPLACEMENT PARTS

Warranty coverage is not dependent upon the use of any particular brand of replacement parts. However, Toyota recommends using only Genuine Toyota Parts when you need to replace a part on your vehicle. Like all Toyota products, Genuine Toyota Parts are built to the highest standards of quality, durability and performance. They are also designed to fit your vehicle's exact specifications.

Your Toyota dealership maintains an extensive inventory of Genuine Toyota Parts to meet your vehicle service needs. And because it is linked electronically to Toyota's Parts Distribution Centers, the dealership has quick access to any parts it may not have in stock.

Genuine Toyota Parts are covered by their own warranty (see your dealer for details) or the remainder of any applicable New Vehicle Limited Warranty, whichever is longer. **Non-Genuine Toyota Parts, or any damage or failures resulting from their use, are not covered by any Toyota warranty.**

OBTAINING WARRANTY SERVICE

BY GEOGRAPHIC REGION

In the United States, U.S. Territories, Canada and Mexico

To obtain warranty service in the United States, U.S. territories, Canada or Mexico, take your vehicle to an authorized Toyota dealership. If your vehicle cannot be driven, contact your nearest Toyota dealership for towing assistance. You do not have to pay for towing to the nearest Toyota dealership if your vehicle is inoperable due to failure of a warranted part.

Outside the United States, U.S. Territories, Canada and Mexico

If you are using your vehicle outside the United States, U.S. territories, Canada and Mexico and need warranty service, contact a local Toyota dealership. Please note, however, that your vehicle may not be repaired free of charge because the local Toyota distributor may have no obligation to provide warranty service for your vehicle, and/or your vehicle may not comply with local regulatory or environmental requirements.

EMERGENCY REPAIRS

If your vehicle is inoperable or unsafe to drive and there is no Toyota dealership reasonably available to make repairs, you may perform the repairs yourself or have them performed by another automotive service provider. Toyota will reimburse you for any of the repairs that are covered by warranty. To receive reimbursement, present to an authorized Toyota dealership your paid repair invoices and any parts that were removed from the vehicle. You will be reimbursed for warranted parts at the manufacturer's suggested retail price and warranted labor at a geographically appropriate hourly rate multiplied by Toyota's recommended time allowance for the repair.

If your vehicle requires emergency repair, Toyota assumes no liability for subsequent failures caused by improper repairs or the use of non-Genuine Toyota Parts unless you have the vehicle properly repaired in a timely manner. To ensure that warranty coverage remains intact, have your vehicle inspected by an authorized Toyota dealership as soon as possible after an emergency repair.

Regular maintenance is essential to obtaining the highest level of performance, safety and reliability from your Toyota. It can also increase your vehicle's resale value. The following pages are designed to help you make sure your vehicle receives proper and timely maintenance. Along with other important information related to vehicle service, you'll find factory-recommended maintenance guidelines and a log in which to document your vehicle's maintenance history.

In addition to scheduled maintenance, your vehicle requires ongoing general maintenance such as fluid checks and visual inspections. These procedures are explained in the "Maintenance and Care" section of the *Owner's Manual*. Be sure to perform these procedures regularly to ensure the most trouble-free operation of your vehicle.

With proper maintenance and care, your vehicle will last longer and deliver more dependable, economical performance. Follow this booklet's recommendations and you'll enjoy maximum reliability and peace of mind from your Toyota for many years to come.



TOYOTA

IMPORTANT MAINTENANCE INFORMATION

It is especially important to both routinely check your vehicle's engine oil level (once a month) and regularly replace the engine oil and oil filter (see the Maintenance Log section of this booklet to determine how often you should change your vehicle's oil and filter). Failure to do so can cause oil starvation and/or oil gelling, which can result in severe damage to your vehicle and require costly repairs that are not covered by the New Vehicle Limited Warranty.

Maintenance Records

Maintaining your vehicle according to the recommendations in this booklet is required to ensure that your warranty coverage remains intact. You should keep detailed records of vehicle maintenance, including date of service, mileage at time of service and a description of service and/or parts installation performed. The scheduled maintenance log in this booklet can help you document this information. If you sell your vehicle, be sure to give your maintenance records to the new owner.

Toyota will not deny a warranty claim solely because you do not have records to show that you maintained your vehicle. However, damage or failure caused by lack of proper maintenance is not covered under warranty.

Maintenance Providers

Maintenance and repair services may be performed by you or by any automotive service provider you choose. Toyota will not deny a warranty claim solely because you used a service provider other than a Toyota dealership for maintenance and repairs. However, damage or failure caused by improper maintenance or repairs is not covered under warranty.

Dealer-Recommended Maintenance

Your dealer may recommend more frequent maintenance intervals or more maintenance services than those listed in the scheduled maintenance log. These additional services are not required to maintain your warranty coverage. Ask your dealer to explain any recommended maintenance not included in the scheduled maintenance log.

For a complete description of Toyota warranty coverages, see the Warranty Information portion of this booklet.

Regular maintenance is essential to obtaining the highest level of performance from your Toyota. It can also increase your vehicle's resale value. This booklet presents Toyota's maintenance recommendations in convenient checklists, so you can easily see what type of maintenance your vehicle needs and document that the work was performed.

To ensure that your vehicle receives first-quality service and parts, Toyota recommends having maintenance performed by an authorized Toyota dealership. Toyota dealership technicians are experts on Toyota vehicles, and they use Genuine Toyota Parts designed to your vehicle's exact specifications. When you go to a Toyota dealership, you can be confident that they will use Genuine Toyota parts and have Toyota-trained technicians.

Miles or Months?

Toyota recommends obtaining scheduled maintenance for your vehicle every 5,000 miles or six months, whichever comes first.

For example:

- If you drive 5,000 miles in less than six months, you should obtain maintenance at **5,000 miles** — don't wait until six months.

- If at six months you have driven less than 5,000 miles, you should obtain maintenance at **six months** — don't wait until 5,000 miles.

Be sure to keep an eye on your mileage so that you obtain maintenance when recommended. If you are a low-mileage driver, mark your calendar to remind yourself to obtain maintenance every six months.

Documenting Your Investment

To help you verify that you've invested in proper maintenance, each maintenance checklist includes space for your Toyota dealership to certify that you obtained Genuine Toyota Service for your vehicle. The dealership may mark the dealer service verification area with the following stamp (which may be customized with the dealership's name):



Special Operating Conditions

In addition to standard maintenance items, the maintenance log indicates services that should be performed on vehicles that are driven under especially demanding conditions. These “special operating conditions” and their required maintenance items are clearly indicated in each chart.

NOTE:

You should perform these additional maintenance services only if the **majority** of your driving is done under the special operating conditions indicated. If you only **occasionally** drive under these circumstances, it is not necessary to perform the additional services.

Engine Oil Selection

Please refer to your *Owner's Manual* for the specific oil viscosity rating recommended for your vehicle/engine type.

Additional Maintenance

In addition to scheduled maintenance, your Toyota requires ongoing general maintenance, such as fluid checks and visual inspections. These procedures are explained in the “Maintenance and Care” section of the *Owner's Manual*. Be sure to perform these procedures regularly to ensure the most trouble-free operation of your vehicle.

SuperChrome and Alloy Wheel Care

If you purchased genuine Toyota accessory SuperChrome or Aluminum Alloy Wheels, follow these cleaning guidelines to maintain the appearance of your wheels:

- If wheels are hot, wait for them to cool before washing.
- Use a soft sponge or cotton cloth to apply the same mild car-wash soap as used for the vehicle body. Quickly rinse off with water. Use a soft cloth to apply the same car wax as used for the vehicle body.
- **DO NOT USE:** Any kind of chemical-based cleaners, alcohol, solvents, gasoline, steam cleaners, scouring pads, wire brushes or coarse abrasives to clean your wheels.

MAINTENANCE LOG

5,000 miles or 6 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

10,000 miles or 12 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Replace engine oil and oil filter²
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

15,000 miles or 18 months

- | | |
|---|--|
| <input type="checkbox"/> Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only) | <input type="checkbox"/> Inspect wiper blades |
| <input type="checkbox"/> Check installation of driver's floor mat | <input type="checkbox"/> Re-torque propeller shaft bolt (4WD) |
| <input type="checkbox"/> Inspect and adjust all fluid levels ¹ | <input type="checkbox"/> Rotate tires |
| | <input type="checkbox"/> Visually inspect brake linings/drums and brake pads/discs |

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Inspect the following:

- | | |
|--|--|
| <input type="checkbox"/> Ball joints and dust covers | <input type="checkbox"/> Radiator and condenser |
| <input type="checkbox"/> Brake lines and hoses | <input type="checkbox"/> Rear differential oil (4WD) |
| <input type="checkbox"/> Cabin air filter | <input type="checkbox"/> Steering gear |
| <input type="checkbox"/> Drive shaft boots | <input type="checkbox"/> Steering linkage and boots |
| <input type="checkbox"/> Engine coolant ⁵ | <input type="checkbox"/> Transfer case oil (4WD) |
| <input type="checkbox"/> Exhaust pipes and mountings | |

NOTE: Driving in heavy traffic, on dirt roads or in urban, dusty or desert areas may shorten the life of the cabin air filter. Replacement may be needed if you notice reduced air flow from the air conditioner and heater or if the windows fog easily when you use the "Fresh" mode. Consult your dealer if any of these conditions occur.

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect engine air filter
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Replace engine oil and oil filter²
- Replace rear differential oil (4WD)
- Replace transfer case oil (4WD)
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

¹ Inspect sealed transmissions, transfer cases and differentials for signs of leakage. If any leakage from a sealed component is suspected, it is recommended that you have the sealed component inspected by a Toyota dealer. Inspect power steering fluid (if equipped) and brake fluid level/condition. Inspect engine and inverter (if equipped) coolant level/condition/freezing point. Your dealer may recommend services (Dealer-Recommended Maintenance) based on inspection results.

² Reset the oil replacement reminder light ("MAINT REQD") or the message "OIL MAINTENANCE REQUIRED" on the multi-information display after maintenance at every 5,000 miles.

³ Perform these service items only if you drive primarily under the conditions indicated.

⁴ Includes operating on roads which road salt has been applied.

⁵ Refer to "Engine Coolant" in the "Explanation of Maintenance Items" section in the back of this guide for more information.

⁶ Not all vehicles are designed for towing. Refer to your Vehicle *Owner's Manual* for details.

MAINTENANCE LOG

20,000 miles or 24 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Replace engine oil and oil filter²
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

25,000 miles or 30 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

30,000 miles or 36 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Re-torque propeller shaft bolt (4WD)
- Replace cabin air filter
- Replace engine air filter
- Replace engine oil and oil filter²
- Replace transfer case oil (4WD)
- Rotate tires

Inspect the following:

- Automatic transmission fluid cooler hoses and connections
- Automatic transmission for signs of leakage
- Ball joints and dust covers
- Brake lines and hoses
- Brake linings/drums and brake pads/discs⁵
- Drive shaft boots
- Engine coolant⁶
- Exhaust pipes and mountings
- Fuel lines and connections, fuel tank band and fuel tank vapor vent system hoses
- Fuel tank cap gasket
- Radiator and condenser
- Rear differential oil (4WD)
- Steering gear
- Steering linkage and boots

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Replace rear differential oil (4WD)
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

¹ Inspect sealed transmissions, transfer cases and differentials for signs of leakage. If any leakage from a sealed component is suspected, it is recommended that you have the sealed component inspected by a Toyota dealer. Inspect power steering fluid (if equipped) and brake fluid level/condition. Inspect engine and inverter (if equipped) coolant level/condition/freezing point. Your dealer may recommend services (Dealer-Recommended Maintenance) based on inspection results.

² Reset the oil replacement reminder light ("MAINT REQD") or the message "OIL MAINTENANCE REQUIRED" on the multi-information display after maintenance at every 5,000 miles.

³ Perform these service items only if you drive primarily under the conditions indicated.

⁴ Includes operating on roads which road salt has been applied.

⁵ Inspect thickness measurement and disc runout.

⁶ Refer to "Engine Coolant" in the "Explanation of Maintenance Items" section in the back of this guide for more information.

⁷ Not all vehicles are designed for towing. Refer to your Vehicle *Owner's Manual* for details.

MAINTENANCE LOG

35,000 miles or 42 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

40,000 miles or 48 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Replace engine oil and oil filter²
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

45,000 miles or 18 months

- | | |
|---|--|
| <input type="checkbox"/> Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only) | <input type="checkbox"/> Inspect wiper blades |
| <input type="checkbox"/> Check installation of driver's floor mat | <input type="checkbox"/> Re-torque propeller shaft bolt (4WD) |
| <input type="checkbox"/> Inspect and adjust all fluid levels ¹ | <input type="checkbox"/> Rotate tires |
| | <input type="checkbox"/> Visually inspect brake linings/drums and brake pads/discs |

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Inspect the following:

- | | |
|--|--|
| <input type="checkbox"/> Ball joints and dust covers | <input type="checkbox"/> Radiator and condenser |
| <input type="checkbox"/> Brake lines and hoses | <input type="checkbox"/> Rear differential oil (4WD) |
| <input type="checkbox"/> Cabin air filter | <input type="checkbox"/> Steering gear |
| <input type="checkbox"/> Drive shaft boots | <input type="checkbox"/> Steering linkage and boots |
| <input type="checkbox"/> Engine coolant ⁵ | <input type="checkbox"/> Transfer case oil (4WD) |
| <input type="checkbox"/> Exhaust pipes and mountings | |

NOTE: Driving in heavy traffic, on dirt roads or in urban, dusty or desert areas may shorten the life of the cabin air filter. Replacement may be needed if you notice reduced air flow from the air conditioner and heater or if the windows fog easily when you use the "Fresh" mode. Consult your dealer if any of these conditions occur.

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect engine air filter
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Replace engine oil and oil filter²
- Replace rear differential oil (4WD)
- Replace transfer case oil (4WD)
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

¹ Inspect sealed transmissions, transfer cases and differentials for signs of leakage. If any leakage from a sealed component is suspected, it is recommended that you have the sealed component inspected by a Toyota dealer. Inspect power steering fluid (if equipped) and brake fluid level/condition. Inspect engine and inverter (if equipped) coolant level/condition/freezing point. Your dealer may recommend services (Dealer-Recommended Maintenance) based on inspection results.

² Reset the oil replacement reminder light ("MAINT REQD") or the message "OIL MAINTENANCE REQUIRED" on the multi-information display after maintenance at every 5,000 miles.

³ Perform these service items only if you drive primarily under the conditions indicated.

⁴ Includes operating on roads which road salt has been applied.

⁵ Refer to "Engine Coolant" in the "Explanation of Maintenance Items" section in the back of this guide for more information.

⁶ Not all vehicles are designed for towing. Refer to your Vehicle *Owner's Manual* for details.

MAINTENANCE LOG

50,000 miles or 60 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Replace engine oil and oil filter²
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁸

- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

55,000 miles or 66 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁸

- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

60,000 miles or 72 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Re-torque propeller shaft bolt (4WD)
- Replace cabin air filter
- Replace engine air filter
- Replace engine oil and oil filter²
- Replace transfer case oil (4WD)
- Rotate tires

Inspect the following:

- Automatic transmission fluid cooler hoses and connections
- Automatic transmission for signs of leakage
- Ball joints and dust covers
- Brake lines and hoses
- Brake linings/drums and brake pads/discs⁵
- Drive belts⁶
- Drive shaft boots
- Engine coolant⁷
- Exhaust pipes and mountings
- Fuel lines and connections, fuel tank band and fuel tank vapor vent system hoses
- Fuel tank cap gasket
- Radiator and condenser
- Rear differential oil (4WD)
- Steering gear
- Steering linkage and boots

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁸

- Replace automatic transmission fluid
- Replace rear differential oil (4WD)
- Tighten nuts and bolts on chassis and body

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace automatic transmission fluid

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

¹ Inspect sealed transmissions, transfer cases and differentials for signs of leakage. If any leakage from a sealed component is suspected, it is recommended that you have the sealed component inspected by a Toyota dealer. Inspect power steering fluid (if equipped) and brake fluid level/condition. Inspect engine and inverter (if equipped) coolant level/condition/freezing point. Your dealer may recommend services (Dealer-Recommended Maintenance) based on inspection results.

² Reset the oil replacement reminder light ("MAINT REQD") or the message "OIL MAINTENANCE REQUIRED" on the multi-information display after maintenance at every 5,000 miles.

³ Perform these service items only if you drive primarily under the conditions indicated.

⁴ Includes operating on roads which road salt has been applied.

⁵ Inspect thickness measurement and disc runout.

⁶ Initial inspection at 60,000 miles/72 months. Inspect every 15,000 miles/18 months thereafter.

⁷ Refer to "Engine Coolant" in the "Explanation of Maintenance Items" section in the back of this guide for more information.

⁸ Not all vehicles are designed for towing. Refer to your Vehicle *Owner's Manual* for details.

MAINTENANCE LOG

65,000 miles or 78 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

70,000 miles or 84 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Replace engine oil and oil filter²
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

75,000 miles or 90 months

- | | |
|---|--|
| <input type="checkbox"/> Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only) | <input type="checkbox"/> Inspect wiper blades |
| <input type="checkbox"/> Check installation of driver's floor mat | <input type="checkbox"/> Re-torque propeller shaft bolt (4WD) |
| <input type="checkbox"/> Inspect and adjust all fluid levels ¹ | <input type="checkbox"/> Rotate tires |
| | <input type="checkbox"/> Visually inspect brake linings/drums and brake pads/discs |

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Inspect the following:

- | | |
|--|--|
| <input type="checkbox"/> Ball joints and dust covers | <input type="checkbox"/> Exhaust pipes and mountings |
| <input type="checkbox"/> Brake lines and hoses | <input type="checkbox"/> Radiator and condenser |
| <input type="checkbox"/> Cabin air filter | <input type="checkbox"/> Rear differential oil (4WD) |
| <input type="checkbox"/> Drive belts | <input type="checkbox"/> Steering gear |
| <input type="checkbox"/> Drive shaft boots | <input type="checkbox"/> Steering linkage and boots |
| <input type="checkbox"/> Engine coolant ⁵ | <input type="checkbox"/> Transfer case oil (4WD) |

NOTE: Driving in heavy traffic, on dirt roads or in urban, dusty or desert areas may shorten the life of the cabin air filter. Replacement may be needed if you notice reduced air flow from the air conditioner and heater or if the windows fog easily when you use the "Fresh" mode. Consult your dealer if any of these conditions occur.

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect engine air filter
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁶

- Replace engine oil and oil filter²
- Replace rear differential oil (4WD)
- Replace transfer case oil (4WD)
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

¹ Inspect sealed transmissions, transfer cases and differentials for signs of leakage. If any leakage from a sealed component is suspected, it is recommended that you have the sealed component inspected by a Toyota dealer. Inspect power steering fluid (if equipped) and brake fluid level/condition. Inspect engine and inverter (if equipped) coolant level/condition/freezing point. Your dealer may recommend services (Dealer-Recommended Maintenance) based on inspection results.

² Reset the oil replacement reminder light ("MAINT REQD") or the message "OIL MAINTENANCE REQUIRED" on the multi-information display after maintenance at every 5,000 miles.

³ Perform these service items only if you drive primarily under the conditions indicated.

⁴ Includes operating on roads which road salt has been applied.

⁵ Refer to "Engine Coolant" in the "Explanation of Maintenance Items" section in the back of this guide for more information.

⁶ Not all vehicles are designed for towing. Refer to your Vehicle *Owner's Manual* for details.

MAINTENANCE LOG

80,000 miles or 96 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Replace engine oil and oil filter²
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

85,000 miles or 102 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

90,000 miles or 108 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Re-torque propeller shaft bolt (4WD)
- Replace cabin air filter
- Replace engine air filter
- Replace engine oil and oil filter²
- Replace transfer case oil (4WD)
- Rotate tires

Inspect the following:

- Automatic transmission fluid cooler hoses and connections
- Automatic transmission for signs of leakage
- Ball joints and dust covers
- Brake lines and hoses
- Brake linings/drums and brake pads/discs⁵
- Drive belts
- Drive shaft boots
- Engine coolant⁶
- Exhaust pipes and mountings
- Fuel lines and connections, fuel tank band and fuel tank vapor vent system hoses
- Fuel tank cap gasket
- Radiator and condenser
- Rear differential oil (4WD)
- Steering gear
- Steering linkage and boots

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Replace rear differential oil (4WD)
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

¹ Inspect sealed transmissions, transfer cases and differentials for signs of leakage. If any leakage from a sealed component is suspected, it is recommended that you have the sealed component inspected by a Toyota dealer. Inspect power steering fluid (if equipped) and brake fluid level/condition. Inspect engine and inverter (if equipped) coolant level/condition/freezing point. Your dealer may recommend services (Dealer-Recommended Maintenance) based on inspection results.

² Reset the oil replacement reminder light ("MAINT REQD") or the message "OIL MAINTENANCE REQUIRED" on the multi-information display after maintenance at every 5,000 miles.

³ Perform these service items only if you drive primarily under the conditions indicated.

⁴ Includes operating on roads which road salt has been applied.

⁵ Inspect thickness measurement and disc runout.

⁶ Refer to "Engine Coolant" in the "Explanation of Maintenance Items" section in the back of this guide for more information.

⁷ Not all vehicles are designed for towing. Refer to your Vehicle *Owner's Manual* for details.

MAINTENANCE LOG

95,000 miles or 114 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

100,000 miles or 120 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Replace engine coolant⁵
- Replace engine oil and oil filter²
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

105,000 miles or 126 months

- | | |
|---|--|
| <input type="checkbox"/> Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only) | <input type="checkbox"/> Inspect wiper blades |
| <input type="checkbox"/> Check installation of driver's floor mat | <input type="checkbox"/> Re-torque propeller shaft bolt (4WD) |
| <input type="checkbox"/> Inspect and adjust all fluid levels ¹ | <input type="checkbox"/> Rotate tires |
| | <input type="checkbox"/> Visually inspect brake linings/drums and brake pads/discs |

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Inspect the following:

- | | |
|-------------------------------|-------------------------------|
| – Ball joints and dust covers | – Exhaust pipes and mountings |
| – Brake lines and hoses | – Radiator and condenser |
| – Cabin air filter | – Rear differential oil (4WD) |
| – Drive belts | – Steering gear |
| – Drive shaft boots | – Steering linkage and boots |
| – Engine coolant ⁶ | – Transfer case oil (4WD) |

NOTE: Driving in heavy traffic, on dirt roads or in urban, dusty or desert areas may shorten the life of the cabin air filter. Replacement may be needed if you notice reduced air flow from the air conditioner and heater or if the windows fog easily when you use the “Fresh” mode. Consult your dealer if any of these conditions occur.

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect engine air filter
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁷

- Replace engine oil and oil filter²
- Replace rear differential oil (4WD)
- Replace transfer case oil (4WD)
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

¹ Inspect sealed transmissions, transfer cases and differentials for signs of leakage. If any leakage from a sealed component is suspected, it is recommended that you have the sealed component inspected by a Toyota dealer. Inspect power steering fluid (if equipped) and brake fluid level/condition. Inspect engine and inverter (if equipped) coolant level/condition/freezing point. Your dealer may recommend services (Dealer-Recommended Maintenance) based on inspection results.

² Reset the oil replacement reminder light (“MAINT REQD”) or the message “OIL MAINTENANCE REQUIRED” on the multi-information display after maintenance at every 5,000 miles.

³ Perform these service items only if you drive primarily under the conditions indicated.

⁴ Includes operating on roads which road salt has been applied.

⁵ Initial replacement at 100,000 miles/120 months. Replace every 50,000 miles/60 months thereafter. Refer to “Engine Coolant” in the “Explanation of Maintenance Items” section in the back of this guide for more information.

⁶ Refer to “Engine Coolant” in the “Explanation of Maintenance Items” section in the back of this guide for more information.

⁷ Not all vehicles are designed for towing. Refer to your Vehicle *Owner’s Manual* for details.

MAINTENANCE LOG

110,000 miles or 132 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Replace engine oil and oil filter²
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁹

- Re-torque propeller shaft bolt (4WD)⁴
- Tighten nuts and bolts on chassis and body

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

115,000 miles or 138 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Rotate tires
- Visually inspect brake linings/drums and brake pads/discs

NOTE: If 0W-16 oil WAS NOT used at the last oil change, replace engine oil and oil filter.²

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Inspect ball joints and dust covers
- Inspect drive shaft boots
- Inspect engine air filter
- Inspect steering linkage and boots
- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁹

- Re-torque propeller shaft bolt (4WD)⁴
- Replace engine oil and oil filter²
- Tighten nuts and bolts on chassis and body

Repeated trips of less than five miles in temperatures below 32°F / 0°C:

- Replace engine oil and oil filter²

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace engine oil and oil filter²

DEALER SERVICE VERIFICATION:

DATE:
MILEAGE:

MAINTENANCE

120,000 miles or 144 months

- Add Toyota EFI Tank Additive or equivalent (Hawaii, Puerto Rico, Saipan and American Samoa only)
- Check installation of driver's floor mat
- Inspect and adjust all fluid levels¹
- Inspect wiper blades
- Re-torque propeller shaft bolt (4WD)
- Replace cabin air filter
- Replace engine air filter
- Replace engine oil and oil filter²
- Replace spark plugs⁵
- Replace transfer case oil (4WD)
- Rotate tires

Inspect the following:

- | | |
|--|--|
| <ul style="list-style-type: none"> – Automatic transmission fluid cooler hoses and connections – Automatic transmission for signs of leakage – Ball joints and dust covers – Brake lines and hoses – Brake linings/drums and brake pads/discs⁶ – Drive belts – Drive shaft boots – Engine coolant⁷ | <ul style="list-style-type: none"> – Exhaust pipes and mountings – Fuel lines and connections, fuel tank band and fuel tank vapor vent system hoses – Fuel tank cap gasket – Radiator and condenser – Rear differential oil (4WD) – Steering gear – Steering linkage and boots – Vacuum pump for brake booster⁸ |
|--|--|

Additional Maintenance Items for Special Operating Conditions³

Driving on dirt roads or dusty roads:

- Tighten nuts and bolts on chassis and body

Driving while towing, using a car-top carrier, or heavy vehicle loading:⁹

- Replace automatic transmission fluid
- Replace rear differential oil (4WD)
- Tighten nuts and bolts on chassis and body

Extensive idling and/or low speed driving for a long distance such as police, taxi or door-to-door delivery use:

- Replace automatic transmission fluid

DEALER SERVICE VERIFICATION:

DATE:

MILEAGE:

¹ Inspect sealed transmissions, transfer cases and differentials for signs of leakage. If any leakage from a sealed component is suspected, it is recommended that you have the sealed component inspected by a Toyota dealer. Inspect power steering fluid (if equipped) and brake fluid level/condition. Inspect engine and inverter (if equipped) coolant level/condition/freezing point. Your dealer may recommend services (Dealer-Recommended Maintenance) based on inspection results.

² Reset the oil replacement reminder light ("MAINT REQD") or the message "OIL MAINTENANCE REQUIRED" on the multi-information display after maintenance at every 5,000 miles.

³ Perform these service items only if you drive primarily under the conditions indicated.

⁴ Includes operating on roads which road salt has been applied.

⁵ Maintenance services of spark plugs are required under the terms of the Emissions Control Warranty.

⁶ Inspect thickness measurement and disc runout.

⁷ Refer to "Engine Coolant" in the "Explanation of Maintenance Items" section in the back of this guide for more information.

⁸ Replace the vacuum pump vane and the vacuum pump vane caps with new ones and never reuse the vacuum pump vane and the vacuum pump vane caps.

⁹ Not all vehicles are designed for towing. Refer to your Vehicle *Owner's Manual* for details.

EXPLANATION OF MAINTENANCE ITEMS

The following descriptions are provided to give you a better understanding of the maintenance items that should be performed on your vehicle. The scheduled maintenance log indicates at which mileage/time intervals each item should be performed. Please note that many maintenance items should be performed only by a qualified technician.

For further information on maintenance items you can perform yourself, see the “Maintenance and Care” section of the *Owner’s Manual*.

Automatic Transmission Fluid

Inspect or replace at specified intervals. When performing inspections, check each component for signs of leakage. If you discover any leakage, have it repaired by a qualified technician immediately.

Ball Joints and Dust Covers

Check the suspension and steering linkage ball joints for looseness and damage. Check all dust covers for deterioration and damage. Replace any deteriorated or damaged parts. A qualified technician should perform these operations.

Brake Lines and Hoses

Visually inspect for proper installation. Check for chafing, cracks, deterioration and signs of leakage. Replace any deteriorated or damaged parts. A qualified technician should perform these operations.

Brake Linings/Drums and Brake Pads/Discs

Check the brake linings (shoes) and drums for scoring, burning, fluid leakage, broken parts and excessive wear. Check the pads for excessive wear and the discs for runout, excessive wear and fluid leakage. Replace any deteriorated or damaged parts. A qualified technician should perform these operations.

Cabin Air Filter

Replace at specified intervals. Driving in heavy traffic, on dirt roads or in urban, desert or dusty areas may shorten filter’s life. More frequent replacement may be necessary.

Drive Belts

Inspect for cracks, excessive wear and oiliness. Check the belt tension and adjust if necessary. Replace the belts if they are damaged.

Drive Shaft Boots

Check the drive shaft boots and clamps for cracks, deterioration and damage. Replace any deteriorated or damaged parts and, if necessary, repack the grease. A qualified technician should perform these operations.

Driver's Floor Mat

- Only use the driver's floor mat designed specifically for the model and model year of your vehicle.
- Always properly secure the driver's floor mat using the retaining hooks.
- Never install another floor mat on top of the existing driver's floor mat.
- Never install the driver's floor mat upside down.

Engine Air Filter

Inspect or replace at specified intervals. When performing inspections, check for damage, excessive wear and oiliness, and replace if necessary.

Engine Coolant

Drain the cooling system and refill with an ethylene-glycol type coolant. Inspect hoses and connections for corrosion and leaks. Tighten connections and replace parts when necessary. A qualified technician should perform these operations. (For further details, refer to "Radiator, Condenser and Hoses" in the "Maintenance and Care" section of the *Owner's Manual*).

Your Toyota is equipped with Genuine Toyota Super Long-Life Coolant. The replacement intervals for engine coolant recommended in this booklet are based on replacement with Genuine Toyota Super Long-Life Coolant or similar high-quality non-silicate, non-amine, non-borate ethylene-glycol coolant with long-life hybrid organic acid technology (i.e., a combination of low phosphates and organic acids). If another type of ethylene-glycol coolant is used, replacement intervals may be different.

EXPLANATION OF MAINTENANCE ITEMS

Engine Oil and Oil Filter

Replace the oil filter and drain and refill the engine oil at specified intervals. For recommended oil grade and viscosity, refer to the *Owner's Manual*.

NOTE: Your vehicle is certified with Genuine Toyota 0W-16 motor oil. For VEHICLES CERTIFIED FOR 0W-16 motor oil, the oil change interval is 10,000 miles or 12 months IF 0W-16 MOTOR OIL IS BEING USED. If 0W-16 is not available, 0W-20 mineral oil may be used. However, it must be replaced at a 5,000-miles or six-month INTERVAL with 0W-16 motor oil.

For customers who primarily drive their vehicle under any of the listed **Special Operating Conditions**, the motor oil and filter should be replaced at 5,000 miles or six months, REGARDLESS OF THE OIL USED (OR CERTIFICATION OF THE VEHICLE).

Exhaust Pipes and Mountings

Visually inspect the exhaust pipes, muffler and hangers for cracks, deterioration and damage. Start the engine and listen carefully for any exhaust gas leakage. Tighten connections or replace parts as necessary.

Fuel Lines and Connections, Fuel Tank Band and Fuel Tank Vapor Vent System Hoses

Visually inspect for corrosion, damage, cracks, and loose or leaking connections. Tighten connections or replace parts as necessary.

Fuel Tank Cap Gasket

Visually inspect for cracks, deterioration and damage and replace if necessary.

Nuts and Bolts on Chassis and Body

Retighten the seat-mounting bolts and front/rear suspension member retaining bolts to specified torque.

Propeller Shaft

Re-torque the propeller shaft bolt. Only a qualified technician should perform this operation.

Radiator and Condenser

Inspect for debris, corrosion and signs of damage. Have any problem repaired immediately by a qualified technician.

Rear Differential Oil

Inspect or replace at specified intervals. When performing inspections, check each component for signs of leakage. If you discover any leakage, have it repaired by a qualified technician immediately.

Spark Plugs

Replace at specified intervals. Install new plugs of the same type as originally equipped. A qualified technician should perform this operation.

Steering Gear

Inspect for signs of leakage. If you discover any leakage, have it repaired immediately by a qualified technician.

Steering Linkage and Boots

With the vehicle stopped, check for excessive freeplay in the steering wheel. Inspect the linkage for bending and damage and the dust boots for deterioration, cracks and damage. Replace any damaged parts. A qualified technician should perform these operations.

Tire Rotation

Tires should be rotated according to the instructions in the *Owner's Manual*. When rotating tires, check for damage and uneven wear. Replace if necessary.

Transfer Case Oil

Inspect or replace at specified intervals. When performing inspections, check for signs of leakage. If you discover any leakage, have it repaired by a qualified technician immediately.

Vacuum Pump for Brake Booster

Inspect or replace at specified intervals. A qualified technician should perform this operation.

Wiper Blades

The wiper blades should not show any signs of cracking, splitting, wear, contamination or deformation. The wiper blades should clear the windshield without streaking or skipping.

VEHICLE IDENTIFICATION

Model _____

In-service date _____

Selling dealership _____

Key number _____

Body style _____

Mileage at delivery _____

Selling dealership phone number _____

Vehicle Identification Number _____



RAV4

Warranty & Maintenance Guide 2020



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This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Toyota Lawsuit Says 2019-2023 RAV4, Corolla Models Plagued by Coolant Bypass Valve Defect](#)
