CLASS ACTION COMPLAINT

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Plaintiffs Jennifer Fausto and Sean Fausto, by undersigned counsel, bring the

following complaint against American Honda Motor Co., Inc., and allege, on their own

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INTRODUCTION Plaintiffs Jennifer Fausto and Sean Fausto (collectively the "Plaintiffs") 1. bring this lawsuit against American Honda Motor Co., Inc. (hereafter "Defendant" or "Honda") on their own behalf and on behalf of a proposed class of past and present

behalf and on behalf of all those similarly situated, as follows:

2020 Honda Passport (all except Sport), 2021-2022 Honda Passport, and 2020-2022

Ohio owners and lessees of the following 2020-2022 Honda Pilot (all except LX),

Honda Odyssey (all except LX) vehicles (hereinafter, the "Class Vehicles" or "Vehicles").

- 2. Plaintiffs and the Class were damaged because the Class Vehicles contain a defective infotainment system that produces an intermittent, unpredictable, and loud popping and/or crackling noise from the speakers (hereafter, the "Electrical Defect" or "Defect").
- 3. The manufacturing and/or assembly Defect existed at the time these Class Vehicles containing the infotainment system left the hands of Honda.
- 4. When the Defect occurs, it does so abruptly and unpredictably, startling the driver and the passengers, and poses a safety risk because the Defect can cause the driver to become distracted

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- 5. Honda either knew of the defect before marketing the Vehicles or failed to conduct adequate testing of the Vehicles system prior to its release. Regardless, soon after the release of the Vehicles, and before Plaintiffs purchased their Class Vehicle, Honda must have known of the defect based on the numerous customer complaints it received and own investigation of the Defect, and based on it settling two class action lawsuits alleging the Defect in prior model year Honda and Acura vehicles, yet Honda continued to market and sell the Vehicles.
- Under the Vehicles' New Vehicle Limited Warranty, Honda is required 6. to "repair or replace any part that is defective in material or workmanship under normal use."1
- 7. But, despite issuing several Technical Service Bulletins ("TSB"), and settling two class action lawsuits involving substantially the same Defect in 2018-2019 Honda Odyssey, 2019 Honda Pilot, and 2019 Honda Passport vehicles, and 2019-2020 Acura vehicle, for years Honda failed to identify a solution to the Electrical Defect and instead simply replaced defective parts with equally defective parts, thereby leaving consumers caught in a cycle of use, malfunction, and

A true and correct copy of the New Vehicle Limited Warranty is available at https://owners.honda.com/Documentum/Warranty/Handbooks/2020_Honda_Warranty_Basebook_R ev02_FINAL_-_SIS.pdf (last visited Jun. 30, 2022);

https://owners.honda.com/Documentum/Warranty/Handbooks/2021 Honda Warranty Basebook P etrol_Hybrid_PHEV.pdf (last visited Jun. 30, 2022);

https://owners.honda.com/Documentum/Warranty/Handbooks/2022_Honda_Warranty_Basebook.pd f (last visited Oct. 10, 2022).

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- 8. Indeed, numerous Class Vehicles owners voiced their complaints on the National Highway and Traffic Safety Administration ("NHTSA") website that despite presenting their vehicles to Honda's authorized dealerships for repairs the Defect persisted:
 - NHTSA ID Number 11432031, September 7, 2021 (Incident Date July 30, 2021): Loud popping and crackling noise emitting from speakers. Cannot turn them off, and causes major interruptions in navigation, radio, entertainment. Dealer said Falkra wiring is faulty, but is back-ordered, and could not even give us an estimate of when it would arrive. Essentially told us to suck it up, but it is more than distracting (my daughter actually said it gives her a headache) and I'm worried about larger (safety) issues if the wiring is indeed faulty. What if my other electrical systems malfunction as well?
 - NHTSA ID Number 11436007, October 8, 2021 (Incident Date September 24, 2021): I'm reaching out to you because I have no options and am completely frustrated. After looking into it (simple google search), I know I'm not alone. There appears to be hundreds (or thousands) of 2020 and other year Honda Pilots where the Infotainment system is failing. It begins with "pops" & "crackles" and just keeps getting worse. Also, intermittently, you will get error messages or a blank screen which could be dangerous. The problem comes and goes which makes it even more frustrating. I have personally taken my 2020 Pilot Elite (MSRP near \$50,000) into my local Honda dealer 4 times already. Ten days after the most recent "repair" it has started all over again. In the past they have admitted they really don't know how to fix it and just keep replacing harnessing and wiring. They want me to bring it in AGAIN for a 5th time. Why should I bring it in when they clearly have no fix? The Pilot was purchased from Shottenkirk Honda (Cartersville, GA) in May 2020 and currently has around 30,000 miles on it. . My father lives in another state and he asked his local Honda dealer if they knew of the issue. They quickly admitted they did and again, admitted they don't know how to remedy it. If you do any simple research you will see it over and over. You can start with this simple Google search: honda pilot

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infotainment problems. As I said, I haven't found anyone who states it's been fixed permanently. I do appreciate the efforts and kindness of my local dealership (Shottenkirk) but at what point will Honda step up and do something of substance to fix the issue or replace the vehicles? This, in my opinion, is not a "Shottenkirk" problem, it is a "Honda" problem. I have tweeted Honda North America and Honda Customer Service and simply got a reply that says they've created a file and will look into it.

- NHTSA ID Number 11444494, December 20, 2021 (Incident Date April 17, 2021): My vehicle was recalled twice before 2,500 miles for wiring harness connector issues (snapping, popping, crackling). I was told I could lose visibility with all dash functions, navigation, radio, etc. After the first and second recall service fix I continued to experience the same symptoms. I opened a case with Honda in June, 2021, and notified my local dealer. The Honda case number is 12314702. I have heard nothing from either Honda and my local dealer, and I am concerned nothing is being done on this issue and I will lose visibility of my dash at some point, putting myself and family in danger.
- NHTSA ID Number 11445959, January 3, 2022 (Incident Date August 25, 2021): Head unit has supposedly been "fixed" already, still losing all electronics, black out screen, loud and startling popping noises. Been asking Honda to fix for months, assigned a case, they just do not seem to care and now vehicle is undrivable due to loud, startling sound that may cause an accident, as well as not knowing if any of the safety electronics are working or not. It almost sounds like shorting out and that means possibility of electrical fire. Honda is dragging their feet doing ANYTHING on this obviously as this has been going on for months.
- NHTSA ID Number 11449070, January 27, 2022 (Incident Date January 26, 2022): Since new, the audio/navigation system has repeatedly turned off and on, had crackling noises emitted from the speakers and issues system warnings. I retuned my first Pilot for the same issues and now this Pilot is demonstrating the same issues. I have had the vehicle at the dealer several times and they just say that it's common with this vehicle model and the Passport with navigation systems. HONDA national service does not return calls and this issue is noted on many HONDA forums. This condition is unacceptable and dangerous.
- NHTSA ID Number 11452259, February 16, 2022 (Incident Date February 9, 2022): The infotainment system makes a

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popping/crackling sound. The dash display and infotainment display flickers on and off at times. This condition makes impedes the use of the the user controls and feedback systems. The vehicle went in for service on October 15, 2021 to have a technical service bulletin update implemented. The vehicle started exhibiting the issue again on February 9, 2022 in a much more extreme and severe way. It went back for service on February 15, 2022 to have the original work "inspected". The dealer said everything was fine and did nothing. Honda as implemented a couple of Technical Service Bulletins, but no permanent fix has been implemented. The dealer mentioned that they apply this TSB to approximately 2 Pilots per day.

- NHTSA ID Number 11452304, February 16, 2022 (Incident Date December 14, 2021): Our Pilot is brand new - we started noticing popping and cracking sounds from the dashboard. It is pretty loud. We thought it was possibly the radio but it continues with the radio off. We thought it was the dashboard contracting/expanding but it happens in all weather. It has become increasing loud and consistent and now any sounds from the stereo, regardless of input, skip and glitch and we turn it off and the popping and cracking sound continues seemingly from the speakers. We took it to the dealership for repair but they said they can't repair it. This is not acceptable for a new car.
- NHTSA ID Number 11459885, April 6, 2022 (Incident Date October 1, 2021): The infotainment screen in the vehicle which includes the backup camera display, navigation, radio, Bluetooth and other important vehicle functions and settings, shuts down and reboots in a continuous loop and sometimes turns off (blank screen) completely. This results in a backup camera function that is no longer useable as the screen does not/cannot display the camera image behind the vehicle. This is an SUV with a large rear blind spot that cannot be viewed simply by turning your head especially if there are short/small objects below the view of the rear glass. The other functions that rely on the screen also do not work and this constant rebooting/flashing is very distracting to the driver. There are also strange noises emanating from the sound system regardless of whether the system is on or off. This appears to be a widespread problem with this vehicle that still does not have a permanent solution. Several repair attempts by the OEM have not fixed this issue.
- NHTSA ID Number 11472189, July 3, 2022 (Incident Date May 10, 2022): The radio began making crackling noises. After a week or so, the

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entire system (navigation, clock, charging ports, dvd, radio/ sound system) stopped working completely. Shortly there after, the battery became completely drained. The dealership refused to honor the 100 month battery warranty, so I was forced to purchase a new battery. The radio & electrical system began to work again, but only for a week. Then the crackling sound began again, followed shortly thereafter with the entire system not working again.

- NHTSA ID Number 11477255, August 2, 2022 (Incident Date August 2, 2022): The Radio started to "crackle or skip" while using apple CarPlay. The crackle noise continued after audio had been paused. Our safety was at risk because the noise was very distracting. I needed to take my hand off the wheel to unplug my phone to stop the noise. The equipment has not been inspected. The only sign of failure were small cracks that were much more intermittent, compared to constant crackling that I am experiencing now.
- NHTSA ID Number 11479504, August 16, 2022 (Incident Date August 12, 2022): Issues with infotainment system, a continuous crackling sound, sounds like electric spark. This occurs for several days and now the system is not working and this affects the operation of backup camera.
- NHTSA ID Number 11487405, October 1, 2022 (Incident Date July 29, 2022): When I drive the 2020 Honda Pilot it has started to make a cracking noise when I turn or go over any bumps in the road. It cuts off navigation and phone conversations from my infotainment system. The cracking noise happens if the system is on or off. It makes it difficult to even carry on a conversation with someone in the car. Not what I expected when I paid over \$40k.
- 9. Plaintiffs provided an authorized Honda dealership and Honda engineers seven attempts to repair their vehicle but the vehicle continued to suffer from the Electrical Defect after each repair attempt.
- Accordingly, Plaintiffs bring this action for breach of express and 10. implied warranties, fraudulent concealment, unjust enrichment, and violation of the

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Ohio Consumer Sales Practices Act, Ohio Rev. Code § 1345.01, et seq. on behalf of an Ohio class of Vehicle lessees and owners. Plaintiffs seek damages and equitable relief on behalf of themselves and all others similarly situated.

- 11. Honda has and will continue to benefit from its unlawful conduct – by selling more vehicles, at a higher price, and avoiding warranty obligations – while consumers are harmed at the point of sale as their vehicles continue to suffer from unremedied defect with their electrical systems. Had Plaintiffs and other proposed Class members known about the Defect at the time of purchase or lease, they would not have bought or leased the Class Vehicles, or would have paid substantially less for them.
- 12. To remedy Honda's unlawful conduct, Plaintiffs, on behalf of proposed class members, seek damages and restitution from Honda, as well as notification to Class members about the Defect.

PARTIES

- Plaintiffs Jennifer Fausto and Sean Fausto are, and at all times mentioned 13. herein were, adult individuals residing in Cincinnati, Ohio.
- 14. Defendant American Honda Motor Co., Inc. is headquartered at 1919 Torrance Boulevard, Torrance, California 90501-2746.

JURISDICTION AND VENUE

This Court has subject matter jurisdiction over this action pursuant to 28 15. U.S.C. § 1332(d) of the Class Action Fairness Act of 2005 because: (i) there are 100

or more class members, (ii) there is an aggregate amount in controversy exceeding \$5,000,000, exclusive of interest and costs, and (iii) there is minimal diversity because Plaintiffs and Honda are citizens of different states.

16. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because Honda resides in this District and a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in this District.

FACTUAL ALLEGATIONS

A. Honda's Knowledge of the Defect

- 17. Honda engineered, manufactured, tested, warranted, advertised, distributed, sold, and leased the Class Vehicles equipped with defective infotainment systems.
- 18. Honda first introduced the infotainment system found in the Class Vehicles in the 2018 Odyssey, and later to the 2019 Pilot and 2019 Passport. It replaced Honda's proprietary "HondaLink" infotainment system, and its operating system is based on a modified Android operating system developed by Honda.
- 19. It is standard practice for automobile manufacturers to engage in extensive pre-launch testing of its vehicles. Honda did so for the Class Vehicles and tested the operation of the infotainment systems prior to selling the Class Vehicles. Given the immediacy and frequency of consumer complaints about the infotainment

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system contained in the Class Vehicles, it is clear that Honda knew about the defects before the Class Vehicles were sold.

- 20. The infotainment systems within the Class Vehicles are defective in that the produce a loud and unexpected popping or crackling noise through the Class Vehicles' speakers or produce no sound from the audio system. Furthermore, such loud and unexpected popping and crackling noise interrupts audio playback from the vehicles' infotainment systems and interrupts conversations over the Class Vehicles' hands-free phone system.
- 21. Because the Class Vehicles' speakers and audio system is responsible for providing audible cues for a wide variety of vehicle functions (including navigation, audio, video, hands-free phone, back up sensors, etc.), the defect causes a wide range of problems for the Vehicles, where the Electrical Defect interrupts the functioning of such functions.
- 22. But it is not only lack of repair that keeps owners of such Class Vehicles frustrated. Indeed, when the Defect occurs, it does so abruptly, unpredictably, and without warning, while the Class Vehicles are in motion on a public roadway, startling the driver, and thus poses a safety risk because the Defect can cause the driver to become distracted.
- 23. Honda has long standing knowledge of the Electrical Defect. There exist a large number of customer complaints on the NHTSA Office of Defect Investigations

("ODI") website, <u>www.safercar.gov</u>, as well as other customer forums addressing car defect and safety issues.

- 24. Federal law requires automakers like Honda to be in close contact with NHTSA regarding potential auto defects, including imposing a legal requirement (backed by criminal penalties) compelling the confidential disclosure of defects and related data by automakers to NHTSA, including field reports, customer complaints, and warranty data. *See* TREAD Act, Pub. L. No. 106-414, 114 Stat. 1800 (2000).
- 25. Automakers have a legal obligation to identify and report emerging safety-related defects to NHTSA under the Early Warning Report requirements. *Id.*Similarly, automakers should and do monitor NHTSA databases for consumer complaints regarding their automobiles as part of their ongoing obligation to identify potential defects in their vehicles, including safety-related defects. *Id.*
- 26. Consistent with its legal duties identified above, and in addition to dealer reports made directly to Honda, Honda knew or should have known of the many complaints about the Electrical Defect logged by NHTSA ODI, and the content, consistency, and large number of those complaints that alerted, or should have alerted, Honda to the Electrical Defect.
- 27. To wit, the Electrical Defect is so pervasive in the Class Vehicles, and in the vehicles of preceding model years, that numerous vehicles owners voiced their complaints about the loud and unexpected popping or crackling sound coming from

the speakers or no sound from the audio system to the NHTSA:

2019 Honda Pilot:

- NHTSA ID Number 11165340, January 5, 2019 (Incident Date November 15, 2018): WHILE DRIVING, BOTH HIGHWAY AND AROUND TOWN, LOUD CRACKLING WOULD OCCUR THROUGH THE SPEAKERS. THEN BOTH THE NAVIGATION SCREEN AND/OR THE SPEEDOMETER SCREEN WOULD GO COMPLETELY BLACK. THE MESSAGE "NETWORK CONNECTION LOST" WOULD SOMETIMES APPEAR. ALL BLUETOOTH CONNECTIVITY AND SPEAKER USAGE WAS LOST. THIS OCCURS ALMOST EVERY DAY WHILE COMMUTING. CAR HAS BEEN BROUGHT TO HONDA SERVICE TWICE FOR REPAIRS.
- NHTSA ID Number 11190215, March 20, 2019 (Incident Date March 16, 2019): RECURRENT PROBLEM. STARTED WHEN VEHICLE WAS 2 MONTHS OLD. TAKEN CAR TO DEALER SERVICE DEPARTMENT. NO SOLUTION. WHEN IN MOTION (HIGHWAYS, CITY ROADS) SPEAKERS MAKE A SPARKLING SOUND FOLLOWED BY THE ENTERTAINMENT SCREEN (NAVIGATION, HANDHELD PHONE, REAR VISION...) AND THE ODOMETER SCREEN (SPEED DISPLAY, ALL THE SIGNALS) BECAME DEAD. IT COULD LAST FEW SECONDS AND REBOOT BACK OR UP TO 30 MINUTES. IN A 15 MILE JOURNEY, COULD HAPPEN AROUND 15 TIMES. SO THE DANGEROUS SITUATION IS THAT I AM DRIVING WITH NO IDEA HOW MUCH SPEED I AM GOING, I AM NOT ABLE TO USE MY HANDHELD PHONE (ALSO VERY IMPORTANT TO ME AS A BUSY DOCTOR TRYING TO ANSWER EMERGENCY CALLS), NO NAVIGATION SYSTEM AVAILABLE, THE REAR VISION CAMERA BECOMES USELESS WITH A BLANK SCREEN... I LEARNT FROM THE INTERNET THAT THIS IS AN ONGOING PROBLEM AND NO SOLUTION HAVE BEEN FOUND. PROBLEM HAPPENS IN MOTION AND ALSO OR WHEN CAR IS PARKED. MY CAR IS 4 MONTHS OLD AND HAS SPENT SEVERAL DAYS AT THE DEALER SERVICE DEPARTMENT AND AT THE LAST VISIT I WAS GIVEN A REPORT IN WHICH STATES THAT HONDA IS STUDYING A NEW SOFTWARE UPDATE. I DON'T WANT RISK MY FAMILY OR OTHERS LIFE'S SO

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WAITING IS NOT AN OPTION. THIS IS NOT JUST ONE INCIDENT, IT KEEPS RECURRING WE BOUGHT THE CAR BRAND NEW FROM THE HONDA DEALER IN NOVEMBER 2018. I HAVE VIDEOS TO PROVIDE PROOF (CAN NOT ATTACH THEM)

- NHTSA ID Number 11206993, May 11, 2019 (Incident Date March 29, 2019): "TAKATA RECALL' CRACKING NOISE THROUGHOUT VEHICLE STARTED A MONTH INTO OWNING THE CAR. SLOWLY THE SYSTEM STARTED TO FAIL PHONE WOULD WORK RADIO WOULDN'T WORK SCREENS WOULD GO OFF AND ON AND FINALLY THE SCREEN WENT BLACK AND NEVER RECOVERED. THEY PUT NEW DRIVER INTERFACE INSTRUMENTAL PANEL AND IT STILL DIDN'T WORK SO HONDA CHANGED THE WIRING HARNESSES INFLOWTAINMENT SYSTEM. IT NOW BACK IN THE SERVICE BC STILL NOT WORKING. VEHICLE IN MOTION. DOESN'T MATTER IF IT MOVING GOING FAST OR SLOW.
- NHTSA ID Number 11240582, July 30, 2019 (Incident Date June 18, 2019): CENTER DISPLAY AND DASHBOARD DISPLAY GO BLANK WHILE DRIVING. IT RESTARTS AFTER SOME TIME. THE CENTER DISPLAY SOMETIMES FLICKERS, SOMETIMES IT MAKES A POPPING NOISE. YOU GET A MESSAGE NETWORK CONNECTION LOST BEFORE THE WHOLE SEQUENCE OF EVENTS START. IT IS A BRAND NEW VEHICLE AND NO ONE IS TAKING OWNERSHIP. THE SCARY THING IS YOU ARE DRIVING ON THE ROAD AND THIS HAPPENS ALL OF A SUDDEN. YOU ARE FORCED TO MOVE OVER TO THE RIGHT LANE AND I HAVE TAKEN IT TO THE DEALER MULTIPLE TIMES. AM HOPING HONDA CAN TAKE OWNERSHIP AND FIX THE ISSUE. IN ALL INSTANCES, I WAS DRIVING ON THE HIGHWAY AT AROUND 60MPH.
- NHTSA ID Number 11256266, September 17, 2019 (Incident Date June 27, 2019): THERE ARE SEVERAL ISSUES AND THEY HAVE HAPPENED MANY TIMES ALL RELATED TO ELECTRICAL SYSTEM, SPEEDOMETER AND INFOTAINMENT DEFECTS. THE INFOTAINMENT AND DASH DISPLAY INCLUDING THE SPEEDOMETER SHUT OFF WHILE DRIVING. THIS INCLUDES THE SPEEDOMETER, ALL SAFETY FEATURES, CRUISE CONTROL SHUTTING OFF WHILE DRIVING. ALSO THE AUDIO

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WILL COMPLETELY SHUT OFF WHILE DRIVING AND I WILL HAVE NO AUDIO FOR HOURS AT A TIME. ALSO THERE ARE POPS AND CRACKLES OUT OF THE SPEAKERS EVERY TIME I DRIVE THE VEHICLE. I HAVE DETAILED DOCUMENTATION FOR THESE ISSUES INCLUDING VIDEOS OF THE ISSUES HAPPENING WHILE DRIVING. DEALERSHIP HAS ATTEMPTED TO REPAIR SEVERAL TIMES AND THE ISSUES GET WORSE, NOT BETTER.

- NHTSA ID Number 11256170, September 17, 2019 (Incident Date April 16, 2019): I PURCHASED MY VEHICLE IN MARCH OF 2019, BY MAY MY DASH/RADIO WENT OUT. FIRST IT STARTED WHEN BLUETOOTH WAS CONNECTED, IT WOULD SOUND LIKE A CRACKING NOISE, LIKE STATIC. THIS IS ALL WHILE VEHICLE IS ON AND IN DRIVING MODE. IT WAS A SCARY SOUND LIKE THAT OF AN ELECTRICAL FIRE WAS GOING TO HAPPEN AT ANY SECOND. ULTIMATELY, BOTH DASH AND RADIO COMPLETELY SHUT OFF AND DIDN'T COME BACK ON. I TOOK IT IN TO THE DEALERSHIP, THEY KEPT MY CAR FOR ALMOST A MONTH AND FINALLY GAVE IT BACK AND STATED THAT THE WIRE HARNESS WAS LOOSE, OR NOT PROPERLY INSTALLED AND THEY HAD RE DONE IT PROPERLY. ALMOST 2 MONTHS LATER THE CRACKING NOISES STARTED AGAIN. AND WOULD SPONTANIOUSLY CUT OFF THE BLUETOOTH. THEN A FEW WEEKS LATER THE DASH WOULD RE START (SHUT OFF AND THEN BACK ON) BLUETOOTH WOULD NOT CONNECT AND SAME NOISES ALL OVER AGAIN. NOW MY DASH TURNS ON SOMETIMES AND THE RADIO DOES NOT CONNECT AND IS A BLACK SCREEN. IT DOES TURN ON SOMETIMES, BUT THIS IS A NEW CAR AND IT'S VERY ANNOYING. HONDA WAS NOT ABLE TO FIX THE PROBLEM, AND I HAVE HEARD SIMILAR ISSUES FROM OTHER OWNERS OF MY SAME VEHICLE.
- NHTSA ID Number 11258912, September 30, 2019 (Incident Date September 28, 2019): I PURCHASED THE VEHICLE ON AUGUST 10, 2019. WITHIN 2 WEEKS THE RADIO BEGAN MAKING A POPPING AND CRACKING SOUND THAT SOUNDED LIKE ROCKS HITTING THE WINDSHIELD. THIS SOUND HAPPENS DAILY WHEN I DRIVE THE VEHICLE. ABOUT ONE

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WEEK AFTER THIS HAPPENED, THE DVD PLAYER WOULD STOP WORKING AND THE SOUND FROM THE RADIO WOULD BEGIN TO COMPLETELY GO OUT. IT WOULD COME BACK ON EVENTUALLY, SOMETIMES AS MUCH AS 30 - 45 MINUTES LATER. AFTER ABOUT TWO WEEKS, THESE PROBLEMS CONTINUED AND THE SCREEN FOR NAVIGATION, ALONG WITH THE SPEEDOMETER SCREEN WOULD COMPLETELY GO BLACK WHILE THE VEHICLE WAS IN MOTION. IT RESTARTS AFTER ABOUT 10 - 20 SECONDS. IN TWO INSTANCES THE REAR BACKUP CAMERA HAS SHUT OFF WHILE I WAS BACKING UP AS WELL. I HAVE REPORTED THE ISSUE TO TWO DEALERSHIPS INCLUDING THE ONE WHERE I MADE THE PURCHASE. I AM SCHEDULED TO TAKE IT IN TO HAVE REPAIRS DONE TOMORROW.

NHTSA ID Number 11266621, October 6, 2019 (Incident Date October 2, 2019): 1ST PROBLEM...VIDEO DISPLAY WORKED ONLY INTERMITTENTLY. 1ST VISIT, WOLFCHASE HONDA UPDATED SOFTWARE, PROBLEM CONTINUED. 2ND VISIT THEY REPLACED VIDEO UNIT. 2ND PROBLEM...SPEAKERS STARTED MAKING CRACKLING NOISE. WENT ON THEIR SITE TO MAKE APPT AND RECEIVED A NOTICE THAT OT A RECALL NOTICE ABOUT ELECTRICAL ISSUE (OR A FLEET CAMPAIGN NOT SURE WHICH). THEY UPDATED SOFTWARE ON THAT 3RD VISIT. SPEAKER PROBLEM WORSENED AFTER THAT VISIT AND SPEEDOMETER DISPLAY AND VIDEO (STEREO SYSTEM. NAVIGATION ETC) WOULD BLANK OUT WHILE DRIVING. SYSTEM WOULD GENERALLY RESET BUT ONLY AFTER 30 SECONDS OF NON VISIBILITY TO MY SPEED, CRUISE CONTROL STATUS ETC.. TOOK IT BACK FOR 4TH VISIT. THEY STATED THEY FOUND AN ISSUE WITH TAILGATE SENSOR. PICKED IT UP ON FRIDAY OCT 4TH AND IT STARTED MAKING THE CRACKLING NOISE IN THE SPEAKERS AGAIN YESTERDAY, OCT 5TH. LAST TIME, IT EVENTUALLY GOT WORSE UNTIL SPEEDOMETER STOPPED WORKING. PLAN TO MAKE ANOTHER APPT (MY 5TH) THIS WEEK. CRACLKING NOISE OCCURS WHEN STOPPED, WHEN DRIVING, WHEN VEHICLE IS TURNED OFF (AFTER BEING ON). VIDEO AND SPEEDOMETER DISPLAY STOP WORKING WHEN DRIVING.

2020 Honda Pilot:

• NHTSA ID Number 11282937, November 29, 2019 (Incident Date November 29, 2019): WE'VE HAD 3 HONDAS AND HAVE BEEN VERY LOYAL HONDA FANS FOR, CLAIMING TO NEVER BUY ANOTHER BRAND. WE BOUGHT OUR PILOT BRAND NEW AND LOVED IT. WE'RE AT 3700 MILES AND HAVING MAJOR ELECTRICAL ISSUES. THE SPEAKERS CRACKLE AND POP LOUDLY CONSTANTLY, WITH THE AUDIO ON OR OFF SO THERE'S NO WAY TO GET A BREAK FROM IT. THE CAR WILL THINK THERE'S GOING TO BE A COLLISION WHEN THERE'S NOTHING IN FRONT OF IT. NOW TODAY, MY HUSBAND DID THE REMOTE START AND WHEN HE GOT OUT TO THE VEHICLE, ALL THE WINDOWS WERE HALF DOWN AND THE SUNROOF HALF OPEN! WE HAVE THE WARRANTY, I MADE AN APPOINTMENT WITH OUR DEALER FOR SERVICE BUT HERE'S THE THING...AFTER RESEARCHING ONLINE I HAVE DISCOVERED THIS IS AN ONGOING ISSUE THAT APPARENTLY HAS NO SOLUTION?! THIS IS VERY DISCOURAGING AND DISAPPOINTING. OUR BRAND NEW PILOT THAT WE LOVED IS NOW A SOURCE OF STRESS AND ANXIETY. HONDA, WHY CONTINUE ROLLING OUT VEHICLES KNOWING THERE IS AN ISSUE WITH YOUR INFOTAINMENT SYSTEM??? MY LOVE OF HONDA IS RAPIDLY SOURING.

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• NHTSA ID Number 11297378, January 6, 2020 (Incident Date January 6, 2020): AS PER OTHER DRIVERS OF 2019 PILOTS AND ODYSSEYS, THE SCREENS ON MY NEW 2020 VEHICLE HAVE GONE OUT, WHILE DRIVING, RENDERING IT IMPOSSIBLE TO GET ANY INFORMATION ABOUT THE VEHICLE, INCLUDING SPEED, WHILE THE VEHICLE IS IN OPERATION. DASHBOARD REBOOTS SEVERAL TIMES WHILE DRIVING. BACKUP CAMERA IS NOT ABLE TO BE UTILIZED DURING THESE EVENTS. WHILE NOT AS DANGEROUS, SPEAKERS EMIT A LOUD CRACKLING NOISE AND NO ENTERTAINMENT OR NAVIGATION SYSTEMS ARE ABLE TO BE USED (INCLUDING REAR ENTERTAINMENT CENTER).

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NHTSA ID Number 11298042, January 8, 2020 (Incident Date December 17, 2019): THESE ISSUES OCCUR WHEN DRIVING, REGARDLESS OF SPEED, ROAD CONDITIONS, ETC. THE ISSUE BEGAN ON APPROXIMATELY 12/17/2019. THE PROBLEM USUALLY STARTS WITH A LOUD CRACKLING NOISE THROUGH THE SPEAKERS, EVEN WHEN THE RADIO IS TURNED OFF. THE DASH, INCLUDING SPEEDOMETER, WILL SHUT OFF LEAVING A BLACK SCREEN WHICH MEANS I HAVE NO IDEA HOW FAST I'M DRIVING. THE CENTER CONSOLE. INCLUDING SATELLITE NAVIGATION AND RADIO, ALSO SHUTS OFF LEAVING A BLACK SCREEN. I PURCHASED THIS MODEL SPECIFICALLY FOR THE SATELLITE NAVIGATION SYSTEM AS I DRIVE FOR WORK & DEPEND ON THIS FUNCTIONALITY. THE ENTERTAINMENT SYSTEM SHUTS DOWN. THE BACKUP CAMERAS AND SAFETY SENSORS ALSO STOP WORKING WHICH MAKES PARKING AND REVERSING DANGEROUS. VOICE CONTROLS AND ABILITY TO MAKE EMERGENT PHONE CALLS ARE NO LONGER AVAILABLE. ALL OF THE AFOREMENTIONED "SHUT DOWN" ISSUES OCCUR SIMULTANEOUSLY AND DO NOT GENERALLY RESOLVE PRIOR TO THE VEHICLE BEING TURNED OFF. WHEN THE DASH IS WORKING, THE BRAKE WARNING OFTEN FLASHES WHEN THERE ARE NO OTHER CARS CLOSE BY. THE CAR HAS BEEN RETURNED TO THE HONDA SERVICE DEPARTMENT THREE TIMES SINCE 12/18/2019, AND THE ENTIRE WIRING HARNESS WAS REPLACED AT THE THIRD VISIT. THE ISSUE STILL PERSISTS SO I WILL RETURN TO THE HONDA SERVICE DEPARTMENT AGAIN TOMORROW.

• NHTSA ID Number 11306906, February 4, 2020 (Incident Date February 3, 2020): WHILE DRIVING MY SPEAKERS BEGAN TO CRACK: YOU CAN'T LISTEN TO THE RADIO. AFTER A FEW MOMMENTS THE SCREEN TURNS BLACK 'NETWORK CONNECTION LOST' GOES BLANK OR AUDIO TURNED OFF. THEM GOES COMPLETELY BLANK. THEM THE SPEEDOMETER WILL ALSO GO BLANK. THIS HAPPEN WHILE USING APPLE CAR PLAY, GPS. AS WELL AS XMRADIO. I WAS ON CITY ROADS THE FIRST TIME IT HAPPENED THEN HIGHWAY WERE IT HAPPENED FREQUENTLY.

- NHTSA ID Number 11308272, February 10, 2020 (Incident Date December 20, 2019): I BEEN HAVING A LOT OF PROBLEMS WITH THE 2020 HONDA PILOT BLACK EDITION THE BRAKE ALERT ON THE DASH COMES ON OUT OF NO WHERE WITHOUT ANYONE OR ANYTHING AROUND ME. THE INFOTAINMENT, DASH AND SPEAKERS WITH SHOTTING OFF N MAKING POPPING NOISES. THIS SUV I USE IT WITH MY FAMILY AND THAT CAN CAUSE A REALLY NASTY ACCIDENT BC ALL THAT HAPPENS ALL OF SUDDEN AND IS REALLY SCARY. I HAD MY SUV ALREADY TWICE IN THE DEALER N NOW IS GOING TO BE 3RD TIME. SOMETHING HAVE TO BE DONE. THIS A 50K+ SUV AND DRIVING WITH A VEHICLE THAT HAVE DOES TYPES OF ISSUES IS A BIG RISK ESPECIALLY WITH OUR KIDS.
- NHTSA ID Number 11309592, February 17, 2020 (Incident Date February 16, 2020): PURCHASED 2020 HONDA PILOT 12/29/2019 OFF THE DEALER DISPLAY FLOOR. PILOT HAS LESS THAN 1000 MILES. WHILE IN MOTION ON THE CITY STREETS AND HIGHWAY, A CRACKING SOUND WILL OCCUR FROM THE DASH BOARD AND THE SPEEDOMETER AND THE AUDIO INFORMATION SCREEN WILL BLACK OUT UNABLE TO GAGE ANYTHING. STILL IN MOTION THE SCREENS WILL UPLOAD, BUT THE SCREENS WILL BLACKOUT AGAIN. THIS WILL HAPPEN FOR SEVERAL MINUTES AT A TIME. THIS WAS REPORTED TO THE DEALER AND WIFE IS HESITANT TO DRIVE THE BRAND NEW PILOT. THE QUESTION BELOW IS REQUESTING A DATE OF OCCURRENCE, BUT THIS IS HAPPENING DAILY WHEN WE DRIVE THE PILOT. NEVER BEEN IN AN ACCIDENT.
- NHTSA ID Number 11310885, February 23, 2020 (Incident Date February 22, 2020): AS I WAS DRIVING THE INFOTAINMENT SYSTEM STARTED CRACKLING AND THEN THE MIDDLE CONSOLE WENT BLACK INCLUDINV MY DASH MIDDLE WITH THE SPEEDOMETER NOT KNOWING HOW FAST I WAS GOING ALL INFO WENT BLANK AND IT KEPT HAPPENINV
- NHTSA ID Number 11311955, February 27, 2020 (Incident Date February 12, 2020): WITH ONLY ABOUT 1200 MILES ON MY NEW 2020 HONDA PILOT, I STARTED TO HEAR LOUD POPPING

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AND CRACKLING SOUNDS COMING FROM MY SPEAKERS. ON THE FIRST TRIP TO THE DEALERSHIP THEY SAID THEY REPLACED THE AMP ON THE INFOTAINMENT SYSTEM. THAT LASTED FOR ABOUT 2 MILES, THEN IT STARTED TO DO IT AGAIN, THIS TIME WITH THE INFOTAINMENT SYSTEM LED SCREEN GOING BLACK FOR SEVERAL MINUTES THEN REBOOTING MULTIPLE TIMES BEFORE FINALLY COMING BACK ON. ON MY SECOND TRIP TO THE DEALERSHIP, THEY TOLD ME THAT THEY ADJUSTED THE WIRING HARNESS AND TIGHTENED A FEW SCREWS. THIS TEMPORARY FIX DID LAST ABOUT 4 WEEKS, BUT THE PROBLEM CAME BACK WITH A VENGEANCE. THIS TIME, IN ADDITION TO THE POPPING AND CRACKLING SOUNDS THAT ARE ANNOYING IN ITSELF, BOTH LED SCREENS, THE INFOTAINMENT ONE AND MY INSTRUMENT PANEL ONE ARE CONSTANTLY REBOOTING AND STAYING OUT FOR LONG PERIODS OF TIME EACH. IN ADDITION, THE SCREEN PANEL DOES FEEL HOT TO THE TOUCH NOW WHEN THIS HAPPENS. SO, ON MY THIRD TRIP TO THE DEALER WE DISCUSSED THIS AND THEY KEPT MY VEHICLE FOR A COUPLE DAYS SO THEY CAN LOOK IT OVER... WHEN I PICKED IT UP I WAS TOLD THAT THEY COULDN'T REPLICATE THE PROBLEM AFTER DRIVING IT FOR ABOUT 18 MILES OVER 2 DAYS. THEY ALSO INFORMED ME THAT THEY CONTACTED HONDA DIRECTLY AND WERE TOLD THAT THEIR ENGINEERS ARE AWARE OF THESE ISSUES BUT DON'T HAVE A "FIX" YET. SO A DAY AFTER LEAVING THE DEALERSHIP THE INSTRUMENT PANEL AS WELL AS THE INFOTAINMENT CENTER WENT BLACK/COMPLETELY OUT WHILE I WAS GOING DOWN A BUSY INTERSTATE. I COULD NOT TELL MY SPEED NOR ANY OTHER VEHICLE DATA AS THE INSTRUMENT PANEL WAS DEAD. WHILE THE INFOTAINMENT CENTER GOING OUT IS BAD, HAVING NO INSTRUMENT PANEL IS VERY DANGEROUS AND A MAJOR SAFETY CONCERN. I'M WORRIED THIS IS ONLY THE BEGINNING OF SOMETHING MORE SERIOUS WHICH IS GOING TO CAUSE A FATAL CRASH. THERE NEEDS TO BE A NATIONWIDE RECALL **IMMEDIATELY!!**

• NHTSA ID Number 11316327, March 15, 2020 (Incident Date February 8, 2020): WHILE DRIVING, CRACKLING AND POPPING STARTED

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COMING OUT OF SPEAKERS, EVEN WITH RADIO OFF. THE INFOTAINMENT SYSTEM THEN SAID "NETWORK SIGNAL LOST" AND THE DASHBOARD DISPLAY WITH THE SPEEDOMETER STARTED REBOOTING OVER AND OVER AGAIN UNTIL I SHUT THE CAR OFF AND TURNED IT BACK ON. THIS IS A SIGNIFICANT SAFETY ISSUE SINCE THE DISPLAYS GO BLANK, I CAN'T TELL HOW MUCH GAS I HAVE, THE REAR-VIEW CAMERA DOESN'T WORK AND I CAN'T TELL HOW FAST I'M GOING. THIS IS BEING REPORTED BY HUNDREDS OF PEOPLE ON VARIOUS SITES AND NEEDS TO BE INVESTIGATED AND A RECALL ISSUED IMMEDIATELY.

NHTSA ID Number 11320996, April 13, 2020 (Incident Date April 6, 2020): LAST WEEK 4/8/2020, MY 2020 HONDA PILOT ELITE STARTING MAKING CRACKING NOISES THROUGH THE SPEAKERS WHILE DRIVING. A COUPLE OF SECONDS LATER THE ENTIRE RADIO, NAVIGATION, AND INFORMATION CENTER WITH SPEEDOMETER, GAS AND OTHER VITAL INFORMATION OF ENGINE SYSTEMS WENT BLACK. THE SYSTEM CAME UP AND STATED THAT IT WAS REBOOTING AND DID NOT HAVE DATA ACCESS. I CALLED THE DEALER AND THEY TOLD ME HOW TO CONDUCT A HARD REBOOT. I DID THIS AND IT WORKED FOR ABOUT 20 MINUTES AND THEN DID IT AGAIN. WHEN I CALLED THE HONDA DEALERSHIP BACK THEY STATED THAT HONDA WAS AWARE OF THE PROBLEM BUT DID NOT YET HAVE A SOFTWARE FIX FOR THE PROBLEM. DURING MY RESEARCH ON THE INTERNET, I HAVE FOUND THAT THIS IS A HUGE ISSUE WELL DOCUMENTED ON THE INTERNET FOR 2017 - 2019 MODEL PILOTS. IN FACT THERE IS A CLASS ACTION LAWSUIT FOR THOSE MODEL YEARS FOR THE SAME EXACT ISSUE. BUT NOW, HAVING BEEN TO THE NHTSA SITE, I SEE THAT IT IS ALSO AN ISSUE FOR NEW 2020 MODELS WITH VERY LOW MILEAGE. THIS IS A BIG PROBLEM AND NEEDS TO BE INVESTIGATED IMMEDIATELY AS EVERYTHING THAT THE DRIVER NEEDS TO SAFELY MONITOR THEIR DRIVING IS AFFECTED BY THIS PROBLEM AND VEHICLE OWNERS ARE NOT GETTING HELP FROM THEIR LOCAL HONDA DEALERSHIP SERVICE DEPARTMENTS. A NATIONAL RECALL FOR SAFETY NEEDS TO BE ISSUED RIGHT AWAY AND PRESSURE ON

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HONDA TO FIND A SOLUTION AND FIX SHOULD BE REQUIRED BY LAW! OUR LOCAL HONDA DEALERSHIP DID STATE THAT THERE APPEARS TO BE A PROBLEM WITH THE WIRING HARNESS, BUT IT ONLY TEMPORARILY FIXES THE ISSUE AFTER BEING REPLACED.

- NHTSA ID Number 11322363, April 27, 2020 (Incident Date April 2, 2020): THE ENTIRE ELECTRICAL SYSTEM SHUTS DOWN WHILE DRIVING, INCLUDING THE MAIN DISPLAY WHICH HAS THE SPEEDOMETER. THE SPEAKERS MAKE AN ENORMOUS CRACKING SOUND BEFORE, DURING AND AFTER THE SHUT DOWN. IT IS A HUGE SAFETY ISSUE AND MAKES THE CAR AN UNSAFE VEHICLE TO DRIVE. IT APPEARS HONDA HAS KNOWN ABOUT THIS ISSUE WITH NO FIX, BUT HAS CONTINUED TO SELL UNSAFE VEHICLES.
- NHTSA ID Number 11325209, May 19, 2020 (Incident Date November 15, 2019): I BOUGHT THIS 2020 HONDA PILOT TOURING OCT 2019. I NOTICED THE POPPING IN THE SPEAKERS AFTER HAVING THE CAR A MONTH MAYBE. I ALSO NOTICED DVD ISSUES AND CONNECTION PROBLEMS. EVERY SINGLE TIME I GET IN MY CAR I HEAR POPPING NOISES THROUGHOUT THE SPEAKERS. OCCASIONALLY I HAVE "LOST NETWORK CONNECTION" AND ONCE MY WHOLE DASH/SPEEDOMETER WENT BLACK. IT ONLY CAME BACK ON 3 DAYS LATER WHEN I TOOK IT TO THE DEALERSHIP. LEITH HONDA IN SOUTHERN PINES/ABERDEEN, NC ACTED "SURPRISED" WITH THESE ISSUES. THEY SAID THEY HAD NEVER SEEN A SPEEDOMETER GO OUT. I DON'T BELIEVE THEM. I'VE HEARD ONE OF THE DOCTORS IN THE AREA RAISED CANE IN THE DEALERSHIP AND THEY REPLACED HIS HONDA PILOT WITH A NEW ONE. THIS POPPING IN THE SPEAKERS, DVD ISSUES, AND OTHER MAJOR ELECTRICAL PROBLEMS ARE VERY DISTRACTING AND THEREFORE DANGEROUS. I HAVE VIDEOS OF THE POPPING AND PICTURES OF EVERYTHING ELSE. UNFORTUNATELY THE VIDEOS WILL NOT UPLOAD TO THIS SAFETY COMPLAINT. EVIDENTLY THIS HAS BEEN GOING ON SINCE 2017ISH. I WOULD HAVE NEVER PURCHASED THIS PILOT IF I'D KNOWN THERE WERE ELECTRICAL ISSUES!!!! WORSE \$41,000 CASH I HAVE EVER SPENT! SHAME ON HONDA

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FOR NOT CORRECTING THE PROBLEM AND CONTINUING TO SELL PROBLEM AUTOMOBILES TO CUSTOMERS! PLEASE CONSIDER THESE ELECTRICAL PROBLEMS AS A DANGER. WE NEED OUR AUTOMOBILES REPAIRED BY HONDA BEFORE SOMETHING TERRIBLE HAPPENS ON THE HIGHWAYS! *TR

- NHTSA ID Number 11325097, May 19, 2020 (Incident Date May 18, 2020): PROBLEMS WITH THE COMPUTERS INCLUDING DASH BOARD INFORMATION AND INFOTAINMENT SYSTEM. PREVIOUSLY HEARD "POPPING NOISES" AND HAD INTERMITTENT BLACK OUTS. I WENT TO START MY VEHICLE AFTER WORK AND BOTH SCREENS WERE BLACK AND WOULD NOT COME ON. THIS MEANS ALL FUNCTIONS OF THESE TWO SCREENS ABSENT; I HAD NO SPEEDOMETER, NO ODOMETER, NO LANE MITIGATION, NO SENSOR BRAKING, NO CRUISE, NO RADIO, NO BLUE TOOTH, NO GPS, NO MAINTENANCE LIGHTS'ETC. I HAD A GAS GAUGE AND A H/C GAUGE THAT DID FUNCTION. *TR
- NHTSA ID Number 11325205, May 19, 2020 (Incident Date April 4, 2020): I JUST LEFT STAPLES AND CAR SPEAKERS WERE POPPING A LOT. I'VE BEEN TRYING TO VIDEO THE PROBLEM SO THAT HOPEFULLY HONDA WILL FIX THE PROBLEM. ABOUT 3 MINUTES INTO THE RIDE, MY NAVIGATION/RADIO/DVD SYSTEM SCREEN "LOST CONNECTION" AND HAD TO RESTART. PAID \$41,000 CASH OCT 2019, AND THIS HAS BEEN AN ONGOING PROBLEM SINCE I BOUGHT IT! SOOOOO FRUSTRATING AND I FEEL RIPPED OFF. IN MARCH, THE SPEEDOMETER AND NAVIGATION SCREEN WHEN OUT FOR SEVERAL DAYS. HONDA ACTS "SURPRISED" AT PROBLEM. I CALL BS. *TR
- NHTSA ID Number 11325260, May 20, 2020 (Incident Date January 1, 2020): THE SPEAKERS WOULD EMIT CONSTANT POPPING/CRACKING SOUNDS AND THE DASH/RADIO WOULD CONSTANTLY POWER CYCLE OFF AND BACK ON. *TR
- NHTSA ID Number 11326619, May 30, 2020 (Incident Date April 30, 2020): AFTER 2 MONTHS OF DRIVING A NEW 2020 PILOT ELITE, THE SPEAKERS STARTED POPPING LOUDLY AND CONTINUOUSLY EVEN WHEN THE AUDIO IS TURNED OFF.

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THE POPPING OCCURS SPORADICALLY AND TOUCH SCREEN REPORTS "NETWORK CONNECTION LOST" WHERE IT WILL NOT PLAY BLUETOOTH AUDIO OR AN FM RADIO STATION. THE POPPING OCCURS WHEN STOPPED AND WHEN MOVING. THIS POPPING IS EXTREMELY ANNOYING AND IT CANNOT BE STOPPED WHILE IT IS OCCURRING. *TR NHTSA ID Number 11327148, June 3, 2020 (Incident Date June 1,

- 2020): BRAND NEW HONDA PILOT 2020; 32 DAYS OFF THE LOT AND THE RADIO SCREEN GOES BLANK, THE SYSTEM SENDS A MESSAGE OF "NETWORK CONNECTION LOST" OR "NO AUDIO CONNECTION". THIS HAPPENS ACROSS AUDIO FEATURES: SIRIUS: AM: FM: BLUETOOTH AND APPLE CAR PLAY. WHEN THE RADIO IS WORKING THERE IS A CONSTANT CRACKLING SOUND ALMOST LIKE YOU ARE LISTENING TO A VINYL RECORD IN YOUR CAR. I GAVE THE BLANK SCREEN THE BENEFIT OF THE DOUBT THINKING IT WAS A ONE OFF BUT BY THE THIRD TIME THAT IT HAPPENED I BROUGHT IT TO THE DEALERSHIP. THEY CAN'T FIGURE OUT WHAT'S WRONG AND THEY HAVE TO KEEP CALLING CALIFORNIA FOR ADVICE. *TR
- NHTSA ID Number 11328061, June 9, 2020 (Incident Date March 15, 2020): I PURCHASED MY 2020 HONDA PILOT ON 12/9/2019. IT HAS BEEN 6 MONTHS AND EACH TIME WHILE DRIVING, I HEAR A LOUD, "CRACKLING" SOUND COMING FROM THE DASHBOARD, PRESUMABLY THE SPEAKERS. THIS HAPPENS EVEN WHEN THE AUDIO SYSTEM IS OFF. AT TIMES, WHEN THE RADIO IS PLAYING, IT WILL DISCONNECT AND IT SOUNDS LIKE AN ELECTRICAL SHORT. ALSO, THE DOOR LOCK BUTTON WHEN DEPRESSED MAKES A CRACKLING SOUND. THIS IS ALL EXTREMELY DISTRACTING WHILE DRIVING. *TR
- NHTSA ID Number 11328882, June 15, 2020 (Incident Date June 12, 2020): THERE IS A CRACKLING NOISE COMING OUT OF THE SPEAKERS THAT BEGINS ONCE THE CAR IS PUT INTO REVERSE OR DRIVE AND CONTINUES INTERMITTENTLY WHILE DRIVING. THE CRACKLING NOISE IS EXACERBATED WHEN MAKING TURNS. SOMETIMES THE RADIO LOSES CONNECTION. AFTER WHICH THE ENTIRE DASH HAS

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BLANKED OUT, LOSING ALL INFORMATION PERTAINING TO ODOMETER AND MORE IMPORTANTLY, SPEEDOMETER. THIS HAS OCCURRED WHILE THE VEHICLE WAS IN MOTION. WHILE DRIVING IN A COMMUNITY. IT IS NOT ONLY A DISTRACTION WHILE DRIVING TO LOSE THIS INFORMATION. BUT ALSO A SAFETY THREAT TO NOT HAVE ANY INDICATION OF YOUR SPEED WHILE DRIVING THE VEHICLE. THE COMPONENT PART/SYSTEM OF CONCERN IS BELIEVED TO BE WIRING/ELECTRICAL. AFTER TAKING IT INTO RALPH SCHOMP HONDA TO HAVE IT DIAGNOSED TWICE, WE HAVE BEEN TOLD 'THIS ISSUE IS CURRENTLY UNDER INVESTIGATION AND CUSTOMER WILL BE CONTRACTED ONCE A FIX BECOMES AVAILABLE.' APPARENTLY, THEY ARE WAITING ON A TOOL TO COME IN FROM HONDA TO ALLOW THEM TO RESOLVE THE ISSUE. IN THE MEANTIME, WE ARE AWAITING RESOLUTION TO THIS ANNOYANCE THAT HAS WORSENED AND NOW BECOME A SAFELY HAZARD. AMERICAN HONDA IS UNREACHABLE BY PHONE (1-800-999-1009). AS THEY ARE CONTINUOUSLY EXPERIENCING 'TECHNICAL DIFFICULTIES' AND PROVIDE NO ALTERNATIVE PHONE NUMBERS OR ALTERNATIVE SUGGESTED METHOD OF **COMMUNICATION. *TR**

- NHTSA ID Number 11329921, June 21, 2020 (Incident Date June 20, 2020): IT FIRST STARTED A COUPLE WEEKS BEFORE THIS WITH A CRACKLING IN THE SPEAKERS. THEN IT WOULDN'T PLAY ANYTHING PLUGGED INTO THE USB. THEN ON THE 20TH IT WOULDN'T PLAY THE RADIO. IT WOULD SAY RADIO UNAVAILABLE. THEN WHEN TRYING TO ACCESS THE RADIO, IT WOULD SAY NETWORK COMMUNICATION LOST AND EVERYTHING WOULD GO BLACK. NO SPEEDOMETER, NO GAUGES, NOTHING. IT WOULD THEN RESTART THE SYSTEM. THEN THE BLUETOOTH STOPPED WORKING. NOW IT JUST CONSTANTLY LOSES NETWORK COMMUNICATION, BLANKS OUT AND RESTARTS. IT DID IT ABOUT 8 TIMES IN MY 10 MINUTE DRIVE HOME. I GOT A VIDEO OF IT WHILE SOMEONE ELSE WAS DRIVING BUT IT WON'T LET ME UPLOAD IT. IT HAPPENS AT ALL SPEEDS, EVEN BEING STOPPED AT A LIGHT.
- NHTSA ID Number 11330321, June 23, 2020 (Incident Date June 22,

2020): SAME PROBLEM AS I AM SEEING ON THIS WEBSITE. WHILE DRIVING, CRACKING AND POPPING NOISE FROM THE SPEAKERS, THEN THE ENTERTAINMENT SCREEN SHUTS OFF AND THERE IS A NOTICE SAYING NO CONNECTION, ALSO, THE SCREENS WHERE THE SPEEDOMETER, AND MILEAGE INFO SHUTS OFF COMPLETELY BLACK, THEN RESETS ITSELF. *TR

- NHTSA ID Number 11338731, July 11, 2020 (Incident Date July 11, 2020): ABOUT 30-40 MINUTES INTO DRIVING WHEN WE HIT A BUMP OR POTHOLE THE SPEEDOMETER AND INFOTAINMENT SCREEN FLICKERS SAYS TUNER LOST, THE AUDIO POPS SEVERELY LIKE SOMETHING HITTING THE WINDSHIELD. IT'S SCARY LOOKS LIKE THE ELECTRICAL SYSTEM IS LOOSE
- NHTSA ID Number 11339028, July 13, 2020 (Incident Date July 1, 2020): TL* THE CONTACT OWNS A 2020 HONDA PILOT. THE CONTACT STATED THAT THE BACK-UP CAMERA AND DASHBOARD WARNING LIGHT FAILED TO OPERATOR CORRECTLY WHILE IN REVERSE OR IN MOTION, WITH AN ABNORMAL NOISE BEING HEARD. THE VEHICLE WAS TAKEN TO GERALD HONDA OF MATTESON (5505 AUTO CT, MATTESON, IL 60443) WHERE IT WAS DIAGNOSED AND DETERMINED THAT THE APPLE CAR PLAY SOFTWARE NEEDED TO BE UPDATED. THE VEHICLE WAS REPAIRED HOWEVER, THE FAILURE RECURRED. THE VEHICLE WAS TAKEN BACK TO THE SAME DEALER FOUR ADDITIONAL TIMES. THE MANUFACTURER WAS CONTACTED BUT NO FURTHER ASSISTANCE WAS PROVIDED. THE FAILURE MILEAGE WAS APPROXIMATELY 1,300.
- NHTSA ID Number 11339277, July 14, 2020 (Incident Date December 15, 2019): I BOUGHT A 2020 NEW HONDA PILOT ELITE ON OCTOBER 2, 2019 WITH 245 MILES ON IT. I BROUGHT MY PILOT ELITE INTO THE DEALERSHIP ON DECEMBER 26, 2019 AFTER DISCOVERING A POPPING NOISE WHICH SOUNDED LIKE A FIRECRACKER GOING OFF THAT SEEMED TO BE BETWEEN THE WINDSHIELD AND DASH WHILE DRIVING.MILEAGE WAS AT 3,956 AT THIS TIME. ON JANUARY 17, 2020, I BROUGHT MY HONDA PILOT INTO THE DEALERSHIP AGAIN. IT DEVELOPED A POPPING NOISE AGAIN BETWEEN THE WINDSHIELD AND

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DASH SOUNDING LIKE A FIRECRACKER GOING OFF WHEN I WAS DRIVING. ON FEBRUARY 5, 2020, THE HONDA PILOT WAS ONCE AGAIN BROUGHT BACK IN. IT WAS POPPING AND CRACKING THIS TIME IN THE AUDIO UNIT BUT NOW ALSO DOOR LOCKS WE'RE MAKING NOISE WHEN IN STATIONARY OR WHILE DRIVING. THE CONTROL PANEL HAD ALSO SHUT OFF A COUPLE TIMES WHERE YOU ONLY SAW A DARK SCREEN AND IT WOULD REBOOT. ON JULY 14TH, AFTER HEARING THIS LOUD POPPING NOISE FOR A COUPLE MONTHS NOW WHILE DRIVING, I HAVE TAKEN IT BACK TO THE DEALERSHIP. IT IS WORSE WHEN YOU GO AROUND ANY TYPE OF CURVES OR ON BUMPY ROADS. IF THE ROAD IS COMPLETELY STRAIGHT AND SMOOTH, I DO NOT HAVE THIS PROBLEM. THIS WHOLE ORDEAL IS SCARY BECAUSE IT IS A HUGE DISTRACTION FOR ME AND I FEAR FOR MY SAFETY. I HAVE BEEN TOLD BY THE SERVICE ADVISOR AGAIN TODAY THAT HONDA IS AWARE AND WORKING ON THIS ISSUE. HE STATED A RECALL IS COMING OUT FOR IT AS WELL AS THE ODYSSEY AND PASSPORT BUT THEY ARE MAKING THE PARTS FOR IT BEFORE THEY RECALL IT. HE SAID THEY CAN PUT A BAND-AID ON IT IN THE MEANTIME UNTIL THE PART CAN BE MADE. SINCE THIS IS THE 2ND TIME IN THE LAST 6 MONTHS I HAVE BEEN TOLD THIS, I'M WORRIED THEY ARE COVERING UP THE ISSUE AND WAITING FOR MY WARRANTY TO BE UP. ALSO, THE SENSOR THAT TELLS YOU WHEN A VEHICLE OR OBJECT IS CLOSE TO YOU IS FAULTY. I WILL BE DRIVING WITH NOTHING AROUND ME AND IT TELLS ME TO BRAKE AND GOES INTO ITS 'SAFETY MODE' WHICH HAS CAUSED ME TO ALMOST HAVE A WRECK.

• NHTSA ID Number 11339959, July 17, 2020 (Incident Date May 12, 2020): MY INFOTAINMENT CENTER AND DASHBOARD SPEEDOMETER HAVE BEEN GOING OUT FOR THE PAST THREE MONTHS WHILE I DRIVE. LOOKING ONLINE THIS WAS AN ISSUE WITH THE 2019 MODELS AND NO SOLUTION TO THE PROBLEM WAS MADE. I WAS NOT INFORMED WHEN PURCHASING THE VEHICLE THAT THESE ISSUES EXISTED AND WHEN TAKING IT INTO THE DEALERSHIP NO LONG TERM FIX TO THE PROBLEM IS OFFERED. I PURCHASED THIS VEHICLE FOR THE NAVIGATION AND DVD OPTIONS THAT I

NOW AM NOW ABLE TO USE YET I STILL PAY THE PAYMENT FOR THEM. TO ME HONDA IS NEGLIGENT BECAUSE THEY ARE AWARE OF THE PROBLEM YET THEY HAVE NOT FIXED IT WHEN I CALL ABOUT DOING ANYTHING TO IT I AM TOLD THEY HAVE TO EXPERIENCE THE PROBLEM WHILE DRIVING IT WHICH COULD TAKE SECONDS OR IT COULD TAKE A WEEK THEN THEY OFFER NO TIME TABLE ON HOW LONG IT WILL TAKE TO FIX IT. THEY ALSO DO NOT OFFER A COURTESY VEHICLE WHILE THEY FIX THE DEFECT. NO RECALLS HAVE BEEN ISSUED FOR THIS PROBLEM EITHER THIS PROBLEM CAN OCCUR ON ANY TYPE OF ROAD AT ANY TIME DRIVING OR PARKED. THE LAST TIME IT WAS ON WAS 7/12/2020 AND IT HAS BEEN OFF SINCE

- NHTSA ID Number 11340119, July 18, 2020 (Incident Date March 1, 2020): POPPLING NOISE FROM SPEAKERS. ELECTRICAL MALFUNCTIONS IN DIGITAL DISPLAYS. REPLACED WIRING HARNESS. 700 MILES LATER SAME PROBLEM, INFORMATION CUTS OUT...COULD LEAD TO CRASHES OR MALFUNCTIONS. THOUSANDS OF COMPLAINTS ON LINE. HAPPENS STOPPED, DRIVING, OR PARKED. THOUSANDS AND THOUSANDS OF COMPLAINTS. WHAT ARE YOU GOING DO DO NHSTA
- NHTSA ID Number 11340056, July 18, 2020 (Incident Date July 17, 2020): I HAVE BEEN GOING BACK AND FORTH WITH THE DEALERSHIP ABOUT THE CAR MAKEING POPING SOUNDS A.D THE ENTIRE DASHBOARD GOING OUT AND I CAN'T SEE ANYTHING ON THERE. SCREEN IS OUT I CAN NOT SEE MY SPEED AND IT HITS THE BRAKES WHEN EVER IM DRIVING AND I ALMOST CRASHED WITH MY KIDS IN THE CAR WITH ME. I AM WORRIED FOR THE SAFTY OF MY KIDS.
- NHTSA ID Number 11341595, July 27, 2020 (Incident Date July 15, 2020): THE INFOTAINMENT AND SOMETIMES THE DASH GO BLANK. PRIOR TO LOSING ALL SIGNALS AND VISUAL, THERE IS LOUD POPPING NOISES AROUND THE WINDSHIELD. THE NOISE SOUNDS LIKE ROCKS HITTING THE WINDSHIELD, BUT IT ENDS UP WITH INFOTAINMENT LOSING ALL COMMUNICATION AND DASH SOMETIMES GOING BLANK. THIS HAPPENED IN JANUARY 2020 WITH ABOUT 1000 MILES ON THE VEHICLE AND HAS HAPPENED ON/OFF OVER THE

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PAST FEW MONTHS. IN JULY IT HAS BEEN A DAILY OCCURANCE AND NO LONGER SAFE TO DRIVE.

- NHTSA ID Number 11341587, July 27, 2020 (Incident Date July 26, 2020): FOLLOW-UP ON COMPLAINT #11340119. JULY 26, 2020. AS PREVIOUSLY NOTED IN COMPLAINT, 2020 HONDA PILOT INFORMATION SYSTEM POPPING NOISE: NOW THE ELECTRICAL SERVICE TO INFORMATION SYSTEM IS COMPLETELY BLACKING OUT: NO SPEEDOMETER INFORMATION, NO TELEPHONE, NO BACK-UP CAMERA. ALL INFORMATION SYSTEMS GO BLACK FROM 10 SECONDS TO SEVERAL MINUTES. JUST BEFORE THIS HAPPENS EMERGENCY BREAKING NOTIFICATION IS DISPLAYED. NO DISPLAY ON FREEWAY FOR SPEED, LANE ASSIST MALFUNCTIONS AND BACKING SENSORS DO NOT WORK. CAR IS UNSAFE TO DRIVE AND HONDA SAYS IT CANNOT FIX SYSTEM. ONLY HAVE 1900 MILES ON VEHICLE. THOUSANDS OF LIVES ARE AT STAKE. WHAT ARE YOU GOING TO DO NHSTA? WAIT FOR FOLKS TO DIE?
- NHTSA ID Number 11341783, July 28, 2020 (Incident Date July 17, 2020): WE PURCHASED BRAND NEW IN JUNE 2020. AFTER LESS THAN ONE MONTH, WE BEGAN HEARING POPPING & CRACKLING FROM THE SPEAKERS. THE RES BEGAN FREEZING TO THE POINT THAT THE DVD PLAYER WOULD NOT WORK AT ALL. POPPING & CRACKLING CONTINUED INTERMITTENTLY, TO THE POINT WHERE THE INFOTAINMENT SCREEN WOULD DISPLAY "NO CONNECTION" ON EVERYTHING--CARPLAY, SIRIUSXM, FM RADIO, ETC. THE INFOTAINMENT SCREEN, AS WELL AS THE GAUGE CLUSTER (INCLUDING SPEEDOMETER, REAR BACK-UP CAMERA, ETC.) THEN BEGAN GOING COMPLETELY BLACK WHILE WE WERE DRIVING ON A COUNTY HIGHWAY, AND REBOOTED MULTIPLE TIMES. WE HAVEN'T EVEN MADE A PAYMENT YET ON THIS VEHICLE, AND IT HAS BEEN SITTING AT THE DEALER FOR REPAIRS FOR THE LAST WEEK. THEY ACKNOWLEDGE THAT IT IS A KNOWN PROBLEM, BUT THERE IS NO KNOWN PERMANENT FIX. I CANNOT STRESS ENOUGH WHAT A SAFETY ISSUE THIS IS. YES, THE POPPING IS INCREDIBLY ANNOYING, BUT IT'S TERRIFYING TO BE DRIVING AND HAVE

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NO SPEEDOMETER, WARNING LIGHTS, BACKUP CAMERA, ETC. HONDA CORPORATE NEEDS TO ACKNOWLEDGE THIS AND MAKE IT RIGHT BEFORE SOMEONE IS SERIOUSLY INJURED.

- NHTSA ID Number 11342380, July 30, 2020 (Incident Date July 30, 2020): ALL PROBLEMS STARTED ABOUT A MONTH OR SO AFTER OWNING THE CAR AND HAVE GOTTEN WORSE OVER TIME. SPEAKER POPPING / CRACKLING PROBLEM - CAN BE VERY LOUD AND PERSISTENT AND ANNOYING RADIO FREEZES AND IS INOPERABLE SPEEDOMETER GOES BLACK (NO SPEED INDICATORS) WHEN TURNING STEERING WHEEL OUTSIDE MIRRORS HAVE AUTO COLLAPSED AT LEAST ONCE THE RANDOM NATURE OF THESE ELECTRICAL PROBLEMS LEAVE WORRY THAT SOMETHING CATASTROPHIC MAY RANDOMLY HAPPEN AT ANY TIME AND EITHER START A FIRE OR CAUSE A DANGEROUS ACCIDENT, OR LEAVE ONE STRANDED WITH AN INOPERABLE VEHICLE. HONDA JUST ANNOUNCED SW UPGRADES THAT SUPPOSEDLY FIX THE INSTRUMENT CONSOLE, BUT HAVE YET TO ANNOUNCE A FIX FOR THE OTHER BIZARRE ELECTRICAL ISSUES. AND TO TOP ALL OF THIS OFF, WITH THIS BEING A WELL KNOWN ISSUE, DEALERSHIPS CONTINUE TO SELL THESE CARS AND IN MY OPINION THAT IS POOR ETHICS.
- NHTSA ID Number 11342590, July 31, 2020 (Incident Date May 6, 2020): WE PURCHASED BRAND NEW IN APRIL 2020. AFTER LESS THAN ONE MONTH, WE BEGAN HEARING POPPING & CRACKLING FROM THE SPEAKERS. THE RES BEGAN FREEZING TO THE POINT THAT THE DVD PLAYER WOULD NOT WORK AT ALL. POPPING & CRACKLING CONTINUED INTERMITTENTLY, TO THE POINT WHERE THE INFOTAINMENT SCREEN WOULD DISPLAY "NO CONNECTION" ON EVERYTHING--CARPLAY, SIRIUSXM, FM RADIO, ETC. THE INFOTAINMENT SCREEN, AS WELL AS THE GAUGE CLUSTER (INCLUDING SPEEDOMETER, REAR BACK-UP CAMERA, ETC.) THEN BEGAN GOING COMPLETELY BLACK WHILE WE WERE DRIVING ON A COUNTY HIGHWAY, AND REBOOTED MULTIPLE TIMES. WE HAVEN'T EVEN MADE A PAYMENT YET ON THIS VEHICLE, AND IT HAS BEEN SITTING AT THE DEALER

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FOR REPAIRS FOR THE LAST WEEK. THEY ACKNOWLEDGE THAT IT IS A KNOWN PROBLEM, BUT THERE IS NO KNOWN PERMANENT FIX. I CANNOT STRESS ENOUGH WHAT A SAFETY ISSUE THIS IS. YES, THE POPPING IS INCREDIBLY ANNOYING, BUT IT'S TERRIFYING TO BE DRIVING AND HAVE NO SPEEDOMETER, WARNING LIGHTS, BACKUP CAMERA, ETC. HONDA CORPORATE NEEDS TO ACKNOWLEDGE THIS AND MAKE IT RIGHT BEFORE SOMEONE IS SERIOUSLY INJURED.

- NHTSA ID Number 11342832, August 2, 2020 (Incident Date July 17, 2020): WHILE IN MOTION, VEHICLE HAS VERY LOUD AUDIBLE POPS. THIS PROBLEM OCCURRED FIRST IN MAY AND AGAIN IN JULY, WITH THE ADDITION OF THE INFOTAINMENT SCREEN GOING OUT MULTIPLE TIMES, INCLUDING LOST ACCESS TO BACKUP CAMERA AND NAVIGATION. SCREEN SHOWS NETWORK CONNECTION LOST. A DEALERSHIP HAS BEEN WORKING FOR TWO WEEKS TO SOLVE THE PROBLEM BY INSPECTING THE MOST BUS CONNECTORS PER HONDA TSB BUT HAS BEEN UNABLE TO RESOLVE THE POPS THUS FAR. SEE PAPERWORK IMAGE BELOW FOR INITIAL ATTEMPTED FIX IN MAY.
- NHTSA ID Number 11342911, August 3, 2020 (Incident Date July 31, 2020): REGARDLESS OF WHETHER THE CAR IS IN DRIVE OR PARK, THE ELECTRONIC SYSTEM MAKES AN AWFUL CRACKING/POPPING SOUND. THIS ALSO HAPPENS WHEN THE DOORS LOCK, ETC. LAST WEEK, THE SOUND GOT SO INTENSE THAT AND ALL OF THE SUDDEN THE SPEEDOMETER AND RADIO SYSTEM WENT COMPLETELY BLANK AND WOULD NOT COME BACK ON. THIS WILL BE THE SECOND TIME THAT THIS CAR HAS GONE INTO THE SHOP FOR REPAIR. I HAVE ALSO NOTICED THAT THE AUTOMATIC BRAKING SYSTEM WILL BRAKE FOR NO REASON - WHICH COULD POTENTIALLY CAUSE A VERY SERIOUS ACCIDENT. I PURCHASED THIS CAR FEELING THAT IT WOULD BE ONE OF THE SAFEST OPTIONS FOR TRANSPORTING MY FOUR CHILDREN. HOWEVER, I HAVE BECOME QUICK TO REALIZE THAT MAY NOT BE THE CASE. I WAS TOLD THAT THIS WAS A RECENT RECALL RELEASED BY HONDA AND THE DEALERSHIP WOULD REPAIR IT THIS

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MORNING. HOWEVER, I HAVE NOT BEEN ABLE TO FIND ANY TYPE OF RECALL ON THIS VEHICLE. I SEE THAT NUMEROUS PEOPLE HAVE THIS SAME COMPLAINT AND I FEEL THAT THIS SHOULD BE TAKEN CARE OF BEFORE SOMEONE BECOMES SERIOUSLY HURT.

- NHTSA ID Number 11343866, August 7, 2020 (Incident Date July 15, 2020): INFOTAINMENT SYSTEM SHUTS OFF AND RESTARTS ON ITS OWN, NEAR CONSTANT LOUD POPS AND CRACKS ARE HEARD IN SPEAKERS. SPEEDOMETER DISAPPEARED AND WENT BLACK WHILE DRIVING AT HIGH SPEED, BACKUP CAMERA SHUT OFF DURING USE, NAVIGATION AND RADIO FAILS AND STATES 'CHECK TUNER' INFOTAINMENT SYSTEM GOES BLACK AND UNABLE TO TURN BACK ON. 'MOST NET OFF' DISPLAYS MULTIPLE TIMES WHEN SYSTEM SHUTS OFF. SYSTEM IS ESSENTIALLY UNUSABLE DUE TO THIS ISSUE. HORN MAY HAVE ALSO STOPPED WORKING DURING BLACK SCREEN.
- NHTSA ID Number 11343845, August 7, 2020 (Incident Date August 2, 2020): WE PURCHASED A NEW 2020 HONDA PILOT TOURING ON JULY 11,2020. AFTER 2 DAYS WE NOTICED STATIC,C CRACKLE AND POPPING SOUNDS FROM THE RADIO AND THIS HAPPENS WITH THE CAR IN MOTION OR SITTING STILL. THEN THE DASH GOES COMPLETELY BLACK AFFECTING THE SPEEDOMETER AND ALL THE GAUGES, BACKUP CAMERA, ETC. TOOK CAR BACK TO WOLFCHASE HONDA SERVICE DEPARTMENT AND WAS TOLD THAT THERE WAS NOTHING THEY COULD DO BECAUSE IT WAS OUT OF THEIR HANDS. BUT AMERICAN HONDA WAS AWARE OF THE PROBLEM, CONTACTED AMERICAN HONDA AND WAS ALSO TOLD THAT THEY COULD NOT REPLACE THE CAR BUT WE WOULD HAVE TO WAIT UNTIL A RECALL WAS ISSUED. NO REGARDS FOR OUR SAFETY AT ALL. AS OF TODAY, AUGUST 7, 2020 WITH 637 MILES ON THE CAR HONDA STILL HAVE NOT REPAIRED THE PROBLEM. WE HAVE PURCHASED 3 VEHICLES FROM HONDA BUT AFTER THIS, ITS OUR LAST. VERY UNHAPPY AND DISSATISFIED WITH HONDA AT THIS POINT.
- NHTSA ID Number 11344206, August 9, 2020 (Incident Date July 31, 2020): BOUGHT A 2020 HONDA PILOT EX-L IN ALBUQUERQUE

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FROM GARCIA HONDA IN MID JULY 2020. FIRST WEEKEND AFTER PURCHASE, I TOOK A 2 HR TRIP (ONE WAY) WITH MY WIFE AND KIDS (5YO AND 10MO). ON MY WAY BACK, I STARTED HEARING CRACKLING NOISE COMING FROM THE SPEAKERS, ALL WHILE LISTENING TO RADIO AND 'GOOGLE MAPS' DIRECTIONS. THE CRACKLING NOSE BECAME MORE SEVERE/PERSISTENT, THEN THE INFOTAINMENT SYSTEM SHUT OFF; FIRST DISPLAYING "NETWORK CONNECTION LOST", THEN OFF COMPLETELY. AT SOME POINT, AFTER THE CENTER INFOTAINMENT SYSTEM DISPLAY WENT OFF, THE INSTRUMENT CLUSTER ALSO SHUT OFF (ONLY DISPLAYED ENGINE TEMPERATURE AND GAS FILL LEVEL). YES, WITH MY KIDS STILL IN THE CAR... WHY WOULD HONDA KEEP ON SELLING VEHICLES THAT ARE KNOWN TO BE DEFECTIVE IN THIS WAY? VERY LIKELY PART OF THE REASON IS TO HELP JUST CONTINUE TO HELP THEMSELVES AND THEIR POCKET BOOKS, ALL AT THE EXPENSE OF MY KIDS' SAFETY. NICE GOING HONDA CORPORATES!! PLEASE LOOK AT YOUR KIDS THEN LOOK IN THE MIRROR AND THINK ABOUT WHAT YOU ARE DOING! IN THE PAST WEEKS SINCE THE VEHICLE PURCHASE. SEEMS I HAVE SPENT MORE TIME AT THE DEALER (3 TIMES, 4TH TIME SCHEDULED... AND THRESHOLD FOR 'LEMON' LAW) THAN WITH MY KIDS. THE SERVICE MANAGER (ANDREW NEUFELD) AND PERSONEL AT GARCIA HONDA ARE VERY ATTENTIVE BUT HAVE TOLD ME THAT THERE IS NOTHING THEY CAN DO TO FIX THIS ISSUE. SO I'M STUCK WITH A VEHICLE I DON'T DARE TO DRIVE WITH MY KIDS IN DUE TO SAFETY CONCERNS. I TEND TO BE LESS OPTIMISTIC THAN MOST BUT A FAIR CONCERN OF MINE IS THE FOLLOWING: HONDA DOES NOT KNOW WHAT CAUSES THE ISSUE, NOR CAN THEY FIX IT. DO THEY KNOW WHAT ALL IS REALLY AFFECTED? ARE OTHER SYSTEMS (OR SYSTEM OUTPUTS) IMPAIRED? WHAT CAN I EXPECT FROM LANE DEPARTURE AND FRONT COLLISION WARNING WHEN THE INFOTAINMENT SYSTEM AND INSTRUMENT CLUSTER DECIDE TO SHUT OFF? BACK UP CAMERA GOES OFF... A NO -

• NHTSA ID Number 11348660, August 11, 2020 (Incident Date August 11, 2020): POPPING, CRACKING EVEN IF RADIO OFF.

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SOMETIMES LIGHT PINGS LIKE ROCK HITTING WINDSHIELD SOMETIMES LOUD LONG STATIC SOUND. RADIO CUTS ODD AND ON. NAVIGATION SCREEN WILL CUT IN AND OUT AND GO BLANK (BLACK). SPEEDOMETER DIAL WILL REBOOT AND OR GO BLANK AND REBOOT. THIS IS ALL WHILE DRIVING THE CAR. I HAVE HAD THE REAR VIEW CAMERA NOT COME ON WHEN FIRST PUTTING IT INTO REVERSE TO BACK UP. IT DID COME ON AFTER PUTTING CAR INTO PARK AND THEN BACK INTO REVERSE. WE HAD RECALL WORK DONE YESTERDAY 8/10/20. 20-047 6MB002018-21 AND 20-051 6HR002019-20 PICKED CAR UP TODAY AND POPPING AND CRACKING NOT FIXED. HAD SERVICE TECH RIDE WITH ME AND HE HEARD IT AND ALSO WITNESSED THE RADIO/NAVIGATION SCREEN GO OUT. THE 'CLUSTER' DID NOT GO OUT DURING THIS TIME. UNSURE IF THE CLUSTER WILL GO OUT AGAIN BUT THE OTHER ISSUES ARE NOT FIXED. HE PUT IN A TICKET THAT STATES THEY ARE UNABLE TO FIX PROBLEM AT THIS TIME AS HONDA DOES NOT HAVE A FIX. THESE ISSUES OCCURRED ON HIGHWAYS, PARKING LOTS, STATIONARY IN DRIVEWAY.

- NHTSA ID Number 11348533, August 11, 2020 (Incident Date June 1, 2020): WHILE DRIVING THE DASH DISPLAY BLACKS OUT INTERMITTENTLY IN ADDITION TO A CONSTANT POPPING/CRACKING SOUNDS FROM THE INFOTAINMENT SYSTEM. THIS IS A KNOWN ISSUE WITH THE 2019-21 HONDA PILOTS IN ALL TRIM MODELS EXCEPT LX. THE SERVICE DEPARTMENT HAS ISSUED THE SERVICE TICKET TO WHAT NEEDS TO BE REPLACED BUT ARE ON A PARTS BACK ORDER UNTIL THE END OF SEPTEMBER. RECOMMENDED SOLUTION IS TO INSTALL/REPLACE THE FAKRA CONNECTOR SET AND MOST SERVICE CORDS ASSOCIATED THE MOST BUS NETWORK.
- NHTSA ID Number 11348830, August 12, 2020 (Incident Date August 1, 2020): INFOTAINMENT SCREEN GOES BLANK, INSTRUMENT PANEL GOES BLANK, RADIO, LOOSE BACKUP CAMERA, RADIO, GPS. THE RADIO INTERMITTENTLY WORKS, AND HAS A STATIC OR CRACKING SOUND. THESE PROBLEMS OCCUR WHILE THE CAR IS IN MOTION, OR STATIONARY, WHILE IN

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THE CITY OR ON A HIGHWAY. I GET MESSAGES SUCH AS NETWORK COMMUNICATION LOST, NO AUDIO CONNECTION, CHECK TUNER. THERE HAVE BEEN OCCASIONS WHERE I LOST THE INSTRUMENT PANEL, AND DID NOT HAVE A SPEED INDICATOR, AND HAVE BEEN BACKING AND LOOSE MY BACKUP CAMERA. THIS LAST TIME I TOOK IT TO A DEALER, THEY PULLED IT OVER TO THE SIDE FOR OVER AN HOUR. THEN CAME TO THE WAITING ROOM AND TOLD ME THEY DIDN'T HAVE ANY PARTS TO REPAIR THE PROBLEM, AND DID NOT KNOW WHEN THEY COULD GET THE PARTS. IT WAS AS THOUGH THEY NEVER HEARD OF SUCH A PROBLEM. THE DEALERSHIP DID UPDATE THE GAUGE CONTROL MODULE SOFTWARE, BUT THE SAFETY PROBLEMS PERSIST. I HAVE VIDEO ON MY PHONE OF SOME OF THESE OCCURRENCES. AND CAN UPLOAD THE INVOICES I RECEIVED FROM THE DEALERSHIP.*DT*JB

- NHTSA ID Number 11349307, August 14, 2020 (Incident Date August 10, 2020): THE CENTER DASH INFOTAINMENT DISPLAY FOR BACKUP CAMERA AND OTHER FEATURES WENT DEAD (BLACK) WHILE DRIVING. THIS OCCURRED ON A NEW 2020 AWD HONDA PILOT TOURING PURCHASED IN DECEMBER OF 2019. AT APPROXIMATELY 1,000 MILES A LOUD INTERMITTENT "POPPING" BEGAN COMING FROM THE SPEAKERS. IT INCREASED IN FREQUENCY AND BECAME CONSTANT OVER TIME. A FEW DAYS AGO, AUGUST 10, 2020 WITH APPROXIMATELY 3,700 MILES ON THE VEHICLE, THE SOUND WAS AT IT'S WORST AND THE DASH CONSOLE SUDDENLY WENT OUT WHILE DRIVING. IT WOULD NOT COME BACK ON. I HAD TO BACK OUT OF A GROCERY STORE PARKING LOT WITHOUT ANY REAR VISIBILITY FROM A HIGH PROFILE VEHICLE WHICH FELT VERY UNSAFE.
- NHTSA ID Number 11349621, August 15, 2020 (Incident Date July 13, 2020): WHILE DRIVING ON THE HIGHWAY THE INSTRUMENT PANEL, INCLUDING THE SPEEDOMETER AND ALL GAUGES, WENT BLACK AND THERE IS A HORRIBLE POPPING AND CRACKLING SOUND COMING FROM THE SPEAKERS. THE SOUND SYSTEM WAS COMPLETELY OFF WHEN THIS HAPPENED. THE DEALERSHIP HAD THE CAR FOR A WEEK TO

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"FIX" IT. ITS BEEN 3 1/2 WEEKS AND NOW ITS STARTED BACK UP AGAIN. THIS IS A NEW 2020 PILOT WITH 1060 MILES ON IT PURCHASED ON 6/24/2020

- NHTSA ID Number 11349738, August 16, 2020 (Incident Date August 13, 2020): AUDIO CRACKLES, INSTRUMENT PANEL AND AUDIO SCREEN REBOOTS RANDOMLY, INTERMITTENT CONNECTION LOST
- NHTSA ID Number 11350374, August 20, 2020 (Incident Date July 15, 2020): MAIN DASHBOARD DISPLAY GOES DARK, ALONG WITH INFOTAINMENT SYSTEM. CRACKS AND POPS HEARD FROM THE SPEAKERS. HANDS FREE STOPS WORKING. WE'VE REPORTED THIS TO THE DEALER AND HAD THE CAR LOOKED AT ON MULTIPLE OCCASIONS. THIS WEEK A SOFTWARE UPDATE WAS APPLIED THAT SEEMED TO MAKE THE PROBLEM WORSE. WITH MAIN GAUGES AND HANDS-FREE NOT WORKING THE VEHICLE IS NOT EASILY OR SAFELY DRIVEN.
- NHTSA ID Number 11351221, August 25, 2020 (Incident Date January 10, 2020): CRACKLING AND POPPING AROUND THE DASH AREA OCCURS WHILE VEHICLE IS STATIONARY OR IN MOTION. THE INFOTAINMENT SYSTEM WILL BLIP OR COMPLETELY GO OUT. WHILE DRIVING THE WHOLE DISPLAY PANEL HAS BLACKED OUT. I HAD TO PULL OVER. TURN THE CAR OFF FOR ABOUT 15 MIN BEFORE THE DISPLAYS CAME BACK ON. ALSO WHILE IN MOTION, THE BACK UP CAMERA WILL BLACK OUT. PROBABLY THE WORST ISSUE IS THAT RANDOMLY, ON THE FREEWAY OR IN TOWN, THE CRASH SENSOR DETECTS SOMETHING THAT ISN'T THERE AND THE "BRAKE" WARNING FLASHES AT ME. THE CAR HAS EVEN BRAKED FOR ME, WHICH THANKFULLY HAPPENED IN TOWN WHILE NOT AT A HIGH SPEED. THESE ELECTRICAL ISSUES STARTED WITH LESS THAN 3000 MILES ON THE CAR. THE FIRST TRIP TO THE DEALERSHIP FOR REPAIR, THEY SAID IT WAS CRIMPED WIRING BY THE FACTORY. THE "REPAIR" LASTED LESS THAN 2 WEEKS. THREE MONTHS LATER, TWO DIFFERENT DEALERSHIPS, 3 TIMES IN THE SHOP, AND THE PROBLEM STILL HAS NOT/CAN NOT BE FIXED. THE DEALERSHIP IS NOW TELLING ME THEY HAVE A TSB FOR THE

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POPPING/CRACKLING BUT THE PARTS ARE BACK ORDERED. WE'LL SEE. VERY DISAPPOINTED WITH HONDA ON THIS.

- NHTSA ID Number 11351137, August 25, 2020 (Incident Date August 25, 2020): EVER SINCE I HAVE PURCHASED THIS CAR I HAVE HAD NOTHING BUT ISSUES. FIRST STARTED WITH CRACKING AND POPPING SOUNDS WITH THE SPEAKERS, EVEN WHEN ALL AUDIO WAS OFF IN THE CAR IT WOULD STILL MAKE THE NOISE. THEN THE DVD PLAYER STOPPED WORKING. NEXT THE CRACKING AND POPPING STARTED ALL THE TIME AND IT WAS NEAR IMPOSSIBLE TO MAKE PHONE CALLS WITH BLUETOOTH IN THE CAR. FINALLY AFTER THE 3RD TIME BACK THE SPEAKERS WERE 80% FIXED AFTER A HONDA REPRESENTATIVE CAME OUT FROM CORPORATE. THEN MY AUTOMATIC BRAKING STARTING HAVING SIGNIFICANT ISSUES. AT FIRST IT WAS A RANDOM OCCURRENCE AND ONLY ONCE IN A BLUE MOON. NOW, LIKE THE OTHER ISSUES, IT IS PROGRESSIVELY GETTING WORSE. I HAVE ALREADY HAD IT IN ONCE AND THEY STATED THEY COULD NOT REPLICATE IT BUT WERE ABLE TO SEE THAT IT HAD BEEN TRIGGERED. SINCE I HAVE HAD MY CAR BACK IN LESS THAN TWO FULL WEEKS IT HAS OCCURRED AT LEAST 12 TIMES ON DIFFERENT ROADS (OPEN HIGHWAY, PLACES WITH NO CARS OR TREES, AT NIGHT OR DAY IT DOESN'T MATTER). I AM NOW AWAITING ANOTHER CALL BACK ABOUT GETTING THIS ISSUE FIXED. OH AND THERE WAS THAT TIME THAT MY BACKUP CAMERA STOPPED WORKING COMPLETELY, CAN'T FORGET THAT. OVERALL, INCREDIBLY UPSET ABOUT HOW MUCH WE SPENT ON A BRAND NEW LEMON.
- NHTSA ID Number 11351478, August 26, 2020 (Incident Date August 24, 2020): DRIVING VEHICLE CRACKING SOUND COMING FROM WINDSHIELD AND RADIO HAS STATIC. DRIVE ON SMOOTH ROAD DOES NOT DO IT.IT DOES IT WHEN HITTING BUMPS OR GOING UP CURBS. CAR WAS TAKEN TO DEALER 8 25 2020 PICKED IT UP TODAY 8 26 2020 DROVE IT HOME PULLED UP IN DRIVEWAY STARTED CRACKING TURNED AROUND BROUGHT IT BACK. SERVICE DEPT SAID THEY KNOW ITS A PROBLEM SERVICE CHIEF TECH SAID

SOMETHING ABOUT WIRING ISSUE.

- NHTSA ID Number 11359801, September 18, 2020 (Incident Date October 15, 2019): NEARLY CONSTANT CRACKLE/POPPING THROUGH SPEAKERS LARGELY RELATED TO BODY FLEXING. THE ROUGHER THE ROAD SURFACE, THE MORE EVIDENT THE NOISE BECOMES. CLEARLY A MECHANICAL ISSUE WITH ELECTRICAL CONNECTIONS. A TEMPORARY IMPROVEMENT MAY OCCUR AFTER APPLYING AN OPEN HAND SMACK TO THE DASH SURFACE ABOVE THE INSTRUMENT CLUSTER. POP/CRACKLE IS EVIDENT EVEN WITH THE SOUND SYSTEM POWERED OFF. ADDITIONALLY, THE INSTRUMENT CLUSTER COMPLETELY FAILS OCCASIONALLY AND THE VEHICLE MUST BE TURNED OFF AND ON TO HAVE THE DISPLAY RETURNED. VERY MUCH A SAFETY ISSUE! BASED ON MY LONG EXPERIENCE IN THE ELECTRONICS INDUSTRY, THIS IS SOME SORT OF GROUNDING OR CONNECTOR ISSUE'OR POSSIBLY AN INTERMITTENT SHORT CIRCUIT (ALTHOUGH NO FUSES HAVE BLOWN). THE ISSUE STARTED SOON AFTER PURCHASE 10/2019 AND CONTINUES THROUGH TODAY, 9/18/2020.
- NHTSA ID Number 11361217, September 26, 2020 (Incident Date September 24, 2020): THE REAR CAMERA FAILS AS A RESULT OF THE CENTER CONSOLE (INFOTAINMENT SYSTEM) SHORTING OUT. THIS ALSO CAUSES DISTRACTION WHILE DRIVING. ADDITIONALLY, THERE IS A LOUND CRACKLING AND POPPING NOISE FROM THE AUDIO SYSTEM WHICH IS RELATED TO THIS ISSUE.
- NHTSA ID Number 11362203, October 1, 2020 (Incident Date October 1, 2020): 2020 HONDA PILOT TOURING HAS COMPLETE BLACK OUT OF ALL ELECTRONICS AND THE DASH BOARD SINCE PURCHASE REGARDLESS IF THE VEHICLE IS MOVING OR STATIONARY. POPPING AND CRACKING CONSTANTLY THROUGHOUT AND BEHIND DASH/WINDSHIELD REGARDLESS IF THE CAR IS STATIONARY OR MOVING. THERE IS NO WAY TO MEASURE ENGINE SPEED, FUEL, OIL PRESSURE, OR WHAT GEAR YOU ARE IN. TOTAL ELECTRICAL FAILURES ARE OCCURRING SINCE PURCHASE, AND THE DEALER HAS NO FIX FOR THE ISSUES, BUT DOES

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ACKNOWLEDGE ALL OF THESE SAFETY AND ELECTRICAL FAILURES ARE FACTORY BORN, AND HONDA HAS FAILED TO FIND OR PROVIDE A FIX. WITH ALL SYSTEMS FAILING, THE CAR IS NOT SAFE TO DRIVE. THE BRAKE SYSTEM WILL BRAKE WHEN YOU ARE TRAVELING SLOW OR AT HIGH SPEEDS. REGARDLESS OF THE FACT THAT NOTHING IS AROUND THE VEHICLE. THIS CAR SHOULD BE RECALLED AND RETURNED TO THE FACTORY BEFORE MORE PEOPLE ARE KILLED OR INJURED. THE CURRENT RECALLS DO NOT FIX ANY OF THE ELECTRICAL SAFETY ISSUES. THESE CARS REQUIRE A TOTAL REWIRE OF FAULTY HARNESS WIRING WHICH IS A FIBER OPTIC DEFECT FROM THE FACTORY. THEREFORE, SOFTWARE UPDATES DO NOT AND WILL NOT FIX THESE SAFETY ISSUES. ALL OF THESE VEHICLES REQUIRE A TOTAL REWIRE. HONDA SHOULD BE ASHAMED OF THEMSELVES FOR ALLOWING CONSUMERS TO CONTINUE DRIVING THESE DEATH TRAPS!.

NHTSA ID Number 11365683, October 22, 2020 (Incident Date October 2, 2020): FIRST MONTH I BOUGHT VEHICLE 10/2019 BEGAN HEARING LOUD CRACKING AND POPPING NOISE WHICH AT FIRST THOUGHT WAS WINDSHIELD. AS IT CONTINUED WE REALIZED WAS COMING THROUGH SPEAKERS. THEN ENTERTAINMENT SYSTEM BEGAN TO SHUT DOWN AND RESET WITH VARIOUS MESSAGES. MAINLY "NETWORK COMMUNICATION LOST". OTHER MESSAGES AS RADIO NOT AVAILABLE WOULD ALSO COME UP. SCREEN WOULD GO BLACK. THEN SPEEDOMETER / TACHOMETER DATA SCREEN WOULD GO BLACK AND REBOOT. TOOK TO DEALER WAS TOLD LOOSE WIRES FROM DVD SYSTEM. THEY 'REPAIRED'. WITHIN TWO MONTHS ALL THE SAME PROBLEMS AND MORE BEGAN AGAIN. REAR VIEW CAMERA WOULD NOT COME ON. OR IT WOULD COME ON WHILE DRIVING FORWARD DOWN THE ROAD. SYSTEM WOULD REBOOT AND GO BLACK SEVERAL TIMES PER DAY. TOOK BACK TO DEALER. THEY WERE NOW AWARE OF PROBLEM IN OTHER VEHICLES. TOLD ME NEEDED NEW WIRING HARNESS. THEY KEPT CAR FOR A WEEK AND REPLACED WIRE HARNESS. VEHICLE WAS FINE FOR ABOUT TWO MONTHS THEN PROBLEMS ALL CAME BACK. SCREENS ALL WENT BLACK REPEATEDLY WHILE

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DRIVING, OR STATIONARY. IT DIDN'T MATTER CONDITIONS BUT ALL ELECTRONIC SYSTEMS WOULD CONTINUOUSLY SHUT DOWN AND REBOOT. A COUPLE WEEKS AGO EVERYTHING WENT BLACK AND HAS REMAINED OFF.

VEHICLE IS NOW BACK AT DEALER FOR THE THIRD TIME TO TRY AND FIX PROBLEMS. THEY TOLD ME THERE ARE RECALLS FOR THE BACK UP CAMERA AND SPEEDOMETER PORTION. AND TRIED TO TELL ME THERE MUST BE A LINK IN THE WIRES SOMEWHERE THAT THEY NEED TO LOCATE. OBVIOUSLY HONDA MUST BE AWARE OF THIS PROBLEM AS THERE ARE HUNDREDS OF POSTS ONLINE ABOUT THE IDENTICAL PROBLEMS IN OTHER 2020 HONDA PILOTS. IT IS NOT SAFE TO DRIVE THE VEHICLE WITHOUT ANY SPEEDOMETER OR INFORMATION SYSTEMS FUNCTIONING.

NHTSA ID Number 11366203, October 24, 2020 (Incident Date October 22, 2020): I WAS DRIVING ON THE FREEWAY AND MY WHOLE INSTRUMENT PANEL WHERE MY SPEEDOMETER IS AND APPS ECT ARE TURNED BLACK WHERE I COULDN'T EVEN SEE HOW FAST I WAS GOING, BUT BEFORE THAT HAPPENED MY STEREO WAS CRACKLING AND CUTTING OUT AND THEN BLACKED OUT AS WELL AND THEN CAME BACK ON AGAIN. I HAVE IT RECORDED FOR MY RECORDS. THEN WHEN I WAS ON MY WAY HOME FROM WHAT THEY SAID AT THE DEALERSHIP WHICH WOULD FIX THE DASH WAS A RECALL ON THE VEHICLE BUT AS SOON AS I CAME IN MY CAR THERE WAS AN UPDATE ON THE DASH OF MY STEREO, WAS STILL CUTTING IN AND OUT AND I COULDN'T USE MY BLUETOOTH LIKE I SHOULD BE ABLE TO OR LISTEN TO MY RADIO THROUGH THE INTERNET OR JUST REGULAR FM RADIO. I ONLY HAVE 3800 MILES ON MY VEHICLE AND HAVE HAD MY VEHICLE FOR JUST SHY OF 5 MONTHS. IT'S RIDICULOUS TO SPEND 40K FOR A VEHICLE THAT DOESN'T EVEN WORK PROPERLY. ALSO BEFORE PURCHASING THE VEHICLE I ASKED THE SALESMAN AT TRACY HONDA WHO THEN ASKED HIS SALES MANAGER MY OUESTION IF THERE WERE STEREO PROBLEMS IN THE VEHICLE I WAS BUYING LIKE THE ONES I'VE BEEN READING ABOUT AND RESEARCHING AND THEY TOLD ME NO IT WAS A MODEL ABOVE MINE AND THEY HADN'T HEARD OF IT AT FIRST. I ALSO ASKED ABOUT THE

DASH TURNING BLACK AND THEY RESPONDED WITH THE SAME THING. SO TECHNICALLY THEY SOLD ME A VEHICLE WITH A RECALL AND LIED ABOUT THE THINGS THAT WERE WRONG WITH THE VEHICLE BEFORE I EVEN BOUGHT IT. IT SHOULD HAVE BEEN SOLD TO ME AS A USED VEHICLE DUE TO THE RECALLS ALREADY ON THE VEHICLE BEFORE I PURCHASED. WHEN I TOOK MY PILOT IN FOR MY RECALL THE SERVICE GUY SAID THAT HIS 2019 CIVIC DOES THE SAME THING AND HE JUST LIVES WITH IT AND THAT'S KIND OF PATHETIC ESPECIALLY WHEN YOU ACTUALLY WORK AT A HONDA DEALERSHIP DO YOU STILL HAVE VEHICLES AND CAN'T EVEN HAVE A STEREO THAT WORKS IN A CAR SOMETHING SO BASIC.

- NHTSA ID Number 11372786, November 2, 2020 (Incident Date October 30, 2020): AFTER HAVING KNOWN RECALL ISSUE REPAIRED, ELECTRICAL/SOUND SYSTEM STILL CONTINUES WITH AGGRESSIVELY LOUD CRACKING AND POPPING NOISES. THE NOISES AT TIMES ARE OUT OF THE BLUE, CAUSING THE DRIVER AND PASSENGERS TO BE STARTLED. THE INSTRUMENT PANEL WILL FREEZE UP AND BLUE TOOTH/VOICE ACTIVATED FEATURES WILL STOP FUNCTIONING. THESE ISSUES OCCUR WHEN THE CAR IS MOVING OR STATIONARY. NO IMPROVEMENT AFTER THE RECALL REPROGRAMMING WAS COMPLETED DESPITE BEING TOLD BY THE SERVICE TECHNICIAN IT WOULD RESOLVE THE ISSUE.
- NHTSA ID Number 11372846, November 3, 2020 (Incident Date October 31, 2020): 2020 HONDA PILOT TOURING 1,156 MILES 3 MONTHS OLD. VEHICLE BEGAN TO STALL WHEN PULLING INTO GARAGE AND APPLYING BREAKS. LOUD SOUNDS COMING THROUGH SPEAKERS AS IF YOU'RE DRIVING THROUGH HAIL. TUNER LOST, NETWORK CONNECTION FAILED, DASHBOARD BLACK. VEHICLE CAN ALSO APPLY BREAKS WHEN NO OTHER CAR IS AROUND. LATEST SYSTEM FAILURE CAR STALLED WHEN APPLYING BREAKS AT AN INTERSECTION. ALSO DRIVER PASSENGER MIRRORS INDEPENDENTLY MOVE WHILE DRIVING. SOFTWARE UPDATE TO CONTROL BOX AND GAUGE CONTROL MODULE WITHOUT

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FIX. NOW TIGHTENED WIRES BEHIND BLU-RAY PLAYER. SENSING/BREAK ISSUES ARE UNKNOWN TO HONDA AND HAVE NOT BEEN FIXED.

- NHTSA ID Number 11383258, December 13, 2020 (Incident Date December 4, 2020): VEHICLE CRACKS AND POPS FROM SPEAKER SYSTEM. SOUNDS AS IF YOUR IN A HAIL STORM. RADIO / NAVIGATION SYSTEMS GOES BLANK AND BACK UP CAMERA GOES BLACK. HAVE HAD TO HONDA OF BRISTOL AND THEY HAVE 'FIXED/REPAIR' THE PROBLEMS. VEHICLE WORKS GREAT FOR A FEW MONTHS, THIS PAST TIME AFTER REPAIRS IT HAS ONLY LASTED ONE WEEK. I DO NOT FEEL AS THIS IS A SAFE VEHICLE FOR ME AND MY FAMILY. THE CRACKING POPPING SOUNDS, THE BLACKOUT OF THE PANELS AND NO BACKUP CAMERA IS A HAZARDOUS SITUATION. THIS HAPPENS WHEN THE CAR IS IN MOTION AND IT'S SCARY I HAVE READ THEIR IS A CIVIL SUITE AGAINST HONDA FOR THIS VEHICLE- HOW DOES ONE FIND **OUT MORE INFORMATION ON THIS**
- NHTSA ID Number 11383527, December 15, 2020 (Incident Date August 9, 2020): WHILE DRIVING WE NOTICED WHAT SOUNDED LIKE SMALL ROCKS HITTING THE WINDSHIELD. AS WE DROVE THE CAR MORE THE CRACKLING/POPPING NOISE GREW WITH FREQUENCY AND INTENSITY. NOW EVERY TIME WE DRIVE WE HEAR INTERMITTENT CRACKLING/POPPING NOISES. AT TIMES IT IS VERY LOUD AND CONSTANT. IT SOUNDS AS THOUGH THE WINDSHIELD IS CRACKING OR GOING TO CRACK. WHEN I PARK THE CAR AND TURN THE ENGINE OFF THE CRACKLING/POPPING NOISE IS STILL HEARD. I AM WORRIED THAT THIS PROBLEM WITH PROGRESS AND WE MAY GET INSTRUMENTATION BLACKOUTS LIKE OTHERS HAVE GOTTEN.
- NHTSA ID Number 11383844, December 16, 2020 (Incident Date December 1, 2020): PURCHASED MY 2020 PILOT ON 12/30/2019 IN FRESNO, CA. RECENTLY THIS MONTH DECEMBER 2020, I STARTED HEARING A CRACKING AND POPPING NOISE FROM THE SPEAKERS. THE POPPING NOISE HAPPENS WHETHER OR NOT MUSIC IS ON. I ALSO STARTED HEARING THIS WEIRD NOISE THAT ALMOST SOUNDED LIKE

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THERE WAS A COMPRESSOR IN MY VEHICLE. I DID SOME RESEARCH ON SEVERAL HONDA PILOT THREADS AND IT SEEMS TO BE THE AC COMPRESSOR AND THE SPEAKERS. APPARENTLY THE WIRING HARNESS NEEDS TO BE CHANGED. I'VE LOOKED OVER THE NHTSA WEBSITE AND SEEN MULTIPLE COMPLAINTS REGARDING THE SPEAKERS POPPING ISSUE. I HAVE NOT TAKEN MY VEHICLE TO THE DEALER YET, I DONT COMPLETELY TRUST DEALERSHIP SERVICE CENTERS AND THEY PREY ON CUSTOMERS AND OVER CHARGE AND MAKE YOU THINK THERE'S OTHER THINGS WRONG WITH THE VEHICLE. I LIKE TO DO MY RESEARCH PRIOR TO TAKING MY CARS TO ANY REPAIR SHOPS. I ALSO VIDEO AND VOICE RECORDED ALL THE WEIRD SOUNDS THAT THE PILOT IS MAKING. HONDA NEEDS TO FIX THIS, IF THIS IN FACT IS A WIRING ISSUE, THIS CAN POSSIBLY CAUSE A SHORT OUT THUS A SAFETY ISSUE. I WILL BE PRINTING OUT SEVERAL OF THESE COMPLAINTS AND SHOWING THEM TO THE DEALER BEFORE THEY TRY TO SWINDLE ME OUT OF AN EXCESS AMOUNT OF MONEY. ALTHOUGH SINCE IT HASN'T EVEN BEEN A YEAR MY VEHICLE SHOULD BE UNDER WARRANTY.

- NHTSA ID Number 11384709, December 23, 2020 (Incident Date September 10, 2020): RANDOM POPPING NOISE, LIKE SOUND OF SMALL ROCKS HITTING WINDSCREEN. OCCASIONALLY THE DISPLAY WHERE SPEEDOMETER IS GOES OUT. AUDIO PROBLEMS WITH RANDOM VOLUME ISSUES. POPPING NOISE OCCURS WHETHER AUDIO SYSTEM IS ON OR OFF. NOTICE IT MORE WHILE IN MOTION AND GOING OVER BUMPY ROAD. BEEN TO DEALER 5 TIMES AND REPLACED WIRING, AMP, HEAD UNIT, AND STILL HAVE ISSUE.
- NHTSA ID Number 11399810, March 8, 2021 (Incident Date March 6, 2021): SPEAKERS MAKE CRACKLING NOISE WHILE PLAYING DVD/BLURAY. GETS LOUDER AND MORE FREQUENT UNTIL ALL AUDIO EVENTUALLY STOPS.
- NHTSA ID Number 11402976, March 15, 2021 (Incident Date February 12, 2021): I'M WRITING TO INFORM YOU OF A SEVERE SAFETY ISSUE THAT OCCURRED WITH OUR 2020 HONDA PILOT TOURING EDITION. MY FAMILY AND I WERE DRIVING ON THE

HIGHWAY AT ABOUT 70 MPH WHEN ALL OF A SUDDEN THE CAR WOULDN'T ACCELERATE AND IN FACT LOST POWER. THE ENGINE LIGHT WAS FLASHING AND WE WERE FORTUNATE TO HAVE AN EXIT RAMP CLOSE AND WE COASTED OFF ON THE EXIT RAMP LIMITED TO 5 MPH. ALL ELECTRONICS WERE ON (RADIO AND DVD), BUT THE CAR FORCED US TO A STOP. WE CALLED THE HONDA SERVICE LINE BECAUSE THIS CAR IS STILL UNDER WARRANTY. THEY INFORMED US NOT TO DRIVE THE CAR AT THIS TIME WITH THE ENGINE LIGHT ON. WE SAT IN THE CAR WITH THE ENGINE LIGHT ON AND PULLED OVER FOR APPROXIMATELY 20 MINUTES. THEY RECOMMENDED TURNING THE CAR OFF FOR 10 MINUTES, LIKE MANUAL SAID, AND THEN RESTART THE CAR TO SEE IF WE CAN DRIVE TO SAFETY. WE DID THIS AND THE ENGINE LIGHT WAS OFF AND WE WERE ABLE TO DRIVE TO A SAFE LOCATION. 100+ MILES AWAY FROM OUR HOME, WE TOOK IT TO A HONDA DEALER. THEY DID AN INSPECTION OF THE CAR AND ATTEMPTED TO READ THE SYSTEM TO FIND OUT WHY THE ENGINE LIGHT CAME ON. THEY WROTE UP A DETAILED REPORT AND SAID THAT THE ENGINE LIGHT MAY NOT HAVE BEEN ON LONG ENOUGH TO GET A READ/REPORT, BUT EVERYTHING ELSE LOOKED OK. THEY DID WRITE IN THEIR REPORT THAT THERE IS A KNOWN BULLETIN FOR A FUEL INJECTION PROBLEM. THEY SAID THEY RECOMMENDED IT, BUT THAT THE ENGINE LIGHT WOULD NEED TO BE ON LONGER TO JUSTIFY RECALL. AND LASTLY, I WANT YOU TO BE AWARE THAT THIS CAR, SINCE PURCHASING NEW, HAS BEEN IN THE SHOP OR NOT CORRECTLY WORKING FOR 4+ MONTH OF THE YEAR WE HAVE OWNED IT. THE DVD PLAYER, INFORMATION ELECTRONIC SCREEN SYSTEM BROKE AND NEEDED REPLACED. ADDITIONALLY, WE HAD LOUD CRACKING AND POPPING NOISE AND IT REQUIRED A CABLE WITH PROPER SHIELDING TO BE REPLACED.

• NHTSA ID Number 11405195, March 28, 2021 (Incident Date March 16, 2021): THIS VEHICLE HAS BEEN NOTHING BUT PROBLEMS SINCE DAY 1. IT BEGAN WITH THE SUNROOF LEAKING AND CAUSING PUDDLES IN THE FRONT AND REAR PASSENGER FLOORS. THAT ISSUE REQUIRED 4 TRIPS TO THE DEALER. THE

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SPEAKERS THEN BEGAN POPPING AND THE RADIO AND DASH WOULD COMPLETELY SHUT OFF WHILE DRIVING. FIXING THAT HAS BEEN ATTEMPTED 5 TIMES AND THE RADIO STILL CONTINUES TO HAVE PROBLEMS. I HAVE ALSO EXPERIENCED FALSE CRASH SENSING AND ONCE, THE AUTO BRAKING SYSTEM MADE ME COME TO ALMOST A COMPLETE STOP WHILE GOING ABOUT 45MPH AND NO ONE WAS EVEN AROUND ME. THIS CAR HAS BEEN A PROBLEM AND IS NOW BECOMING A HUGE SAFETY CONCERN AS MY WIFE WHO REGULARLY DRIVES IT IS NOW PREGNANT. SHE IS SCARED TO DRIVE IT AND HONDA IS UNWILLING TO HELP SOLVE THE ISSUES.

NHTSA ID Number 11408535, April 17, 2021 (Incident Date January 27, 2021): MY 2020 PILOT HAS SEVERAL ISSUES. 1. THE DASHBOARD AND INFOTAINMENT SYSTEM BLACKOUT. IN SEPT 2020, HONDA REPLACED THE MOST MODULE AND SAID THIS WOULD FIX THE PROBLEM. SEVERAL WEEKS AGO, MY INFOTAINMENT SYSTEM AGAIN WENT BLANK (3/6/2021), I HAD NO BACK UP CAMERA OR INFORMATION. THIS FIX OBVIOUSLY DID NOT WORK. I TOOK VIDEO ON MY PHONE. I TOOK THE VEHICLE TO HONDA, THEY WOULD NOT LOOK AT MY VIDEO AND SAID THAT THEY NEEDED TO RECREATE IT (3/26/21). THEY DID NOTHING. I ALSO GOT THE FOLLOWING MESSAGE SEVERAL DAYS LATER (3/12/21). "UNFORTUNATELY, COM.HONDA, TELEPHONYSERVICE HAS STOPPED." I ALSO SHOWED THIS TO THE HONDA SERVICE CENTER, THEY SAID INTERESTING, WE HAVE NEVER SEEN THAT. THEY DID NOT WANT MY PICTURE, AND COULD NOT RECREATE, SO THEY DID NOTHING. THE CRACKLING/POPPING NOISE IS ALSO BACK AFTER IT WAS SUPPOSED TO BE FIXED, WITH THE HONDA REPAIR. THEY COULD NOT RECREATE THIS EITHER, SO THEY DID NOTHING. 2. I HAVE ISSUES WITH THE FORWARD COLLISION BRAKING. AUTO SENSING. I LIVE IN A RURAL AREA AND WHEN DRIVING ON TWO LANE ROADS. HEAD ON TO THE OTHER TRAFFIC THE VEHICLE CONSTANTLY BRAKES. WHEN DRIVING OVER TWO LANE BRIDGES, WHICH I DO OFTEN, IT BRAKES SEVERAL TIMES A TRIP TRYING TO GET OVER THE BRIDGE. THIS IS NOT SAFE. ONE TIME I WAS ON 66 IN VA

(1/27/21), AT NIGHT, AN 18 WHEELER WAS COMING OFF AN EXIT RAMP, I WAS IN THE RIGHT LANE. THE VEHICLE SLAMMED ON THE BRAKES AND DROPPED MY SPEED APPROXIMATELY 20-25 MPH FOR NO REASON. THE 18 WHEELER WAS STILL ON THE EXIT RAMP. I WAS ALMOST REAR ENDED BY THE VEHICLE BEHIND ME. THE BRAKE SENSING IT TOO SENSITIVE. I HAVE TAKEN IT IN FOR THIS, THEY COULD NOT RECREATE AND TOLD ME TO TURN IT OFF. THAT IS NOT AN ANSWER. IF A VEHICLE HAS SAFETY OPTIONS, WE SHOULD BE ABLE TO USE THEM AND NOT BE TOLD TO TURN THEM OFF! THE 2020 PILOT HAS A LOT OF ISSUES THAT ARE NOT BEING FIXED. THIS VEHICLE SHOULD BE TAKEN OFF THE ROAD.

- NHTSA ID Number 11417803, May 19, 2021 (Incident Date April 7, 2020): On April 4.7.2020 I visited The Honda Dealer to report my dashboard and control console shutting off while driving. On 4.14.2020 I again visited the Honda Dealer to report a problem related to the same issue since it was not repaired. On 5.4.2020 I emailed the asst service manager about the backup camera going black/off. On 4.21.2021 I returned to the Honda Dealer again for the entire control display/camera display shutting off and crackling from the audio system. The dealer is not writing my concerns when the vehicle is inspected, I believe to deny the issue and avoid lemon law.
- NHTSA ID Number 11429213, August 16, 2021 (Incident Date May 1, 2021): When vehicle is on, in drive-braked-or parked status, an incremental sound of electrical crackling and popping increasingly develops both in noise level and intensity, and emits throughout the vehicle. Culmination of this erratic electrical activity results in a loud chromatic/bursting "crack" sound and shutdown of the audio system. Component appears to be in the wiring harness and electrical system connections. Safety Issue total distraction to driver's attention, disturbing, and alarming concern to passengers. Problem Confirmed or Reproduced Yes. Diagnostic errors captured and recorded on multiple occasions, with shutdown randomly occurring. Warning and Appearance No warning or apparent related catalyst is evident. First occurrence at 7,000 miles and continues.
- NHTSA ID Number 11429638, August 18, 2021 (Incident Date October 9, 2020): I have been dealing with the issue of my stereo crackling for

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over a year. The first appt is listed below. I have taken my car in 4 different times for this issue and am still as of today waiting on the part to come in to fix my car. I had an appt today and was told that the part was in and after dropping off my car was told the part is not in stock and they don't know when it is coming in. This is a dangerous and unsafe driving situation. The navigation turns off, the radio completely shuts off including my dashboard so I don't know how fast I am going. The crackling noise continues if the car is on or off. This is very distracting and loud especially since you cannot control the level of the noise. I think waiting a year for this to be resolved has been long enough and I expect the dealership to step in and provide some options.

NHTSA ID Number 11436007, October 8, 2021 (Incident Date September 24, 2021): I'm reaching out to you because I have no options and am completely frustrated. After looking into it (simple google search), I know I'm not alone. There appears to be hundreds (or thousands) of 2020 and other year Honda Pilots where the Infotainment system is failing. It begins with "pops" & "crackles" and just keeps getting worse. Also, intermittently, you will get error messages or a blank screen which could be dangerous. The problem comes and goes which makes it even more frustrating. I have personally taken my 2020 Pilot Elite (MSRP near \$50,000) into my local Honda dealer 4 times already. Ten days after the most recent "repair" it has started all over again. In the past they have admitted they really don't know how to fix it and just keep replacing harnessing and wiring. They want me to bring it in AGAIN for a 5th time. Why should I bring it in when they clearly have no fix? The Pilot was purchased from Shottenkirk Honda (Cartersville, GA) in May 2020 and currently has around 30,000 miles on it. . My father lives in another state and he asked his local Honda dealer if they knew of the issue. They quickly admitted they did and again, admitted they don't know how to remedy it. If you do any simple research you will see it over and over. You can start with this simple Google search: honda pilot infotainment problems. As I said, I haven't found anyone who states it's been fixed permanently. I do appreciate the efforts and kindness of my local dealership (Shottenkirk) but at what point will Honda step up and do something of substance to fix the issue or replace the vehicles? This, in my opinion, is not a "Shottenkirk" problem, it is a "Honda" problem. I have tweeted Honda North America and Honda Customer Service and simply got a reply that says they've created a file and will look into it.

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- NHTSA ID Number 11444494, December 20, 2021 (Incident Date April 17, 2021): My vehicle was recalled twice before 2,500 miles for wiring harness connector issues (snapping, popping, crackling). I was told I could lose visibility with all dash functions, navigation, radio, etc. After the first and second recall service fix I continued to experience the same symptoms. I opened a case with Honda in June, 2021, and notified my local dealer. The Honda case number is 12314702. I have heard nothing from either Honda and my local dealer, and I am concerned nothing is being done on this issue and I will lose visibility of my dash at some point, putting myself and family in danger.
- NHTSA ID Number 11445959, January 3, 2022 (Incident Date August 25, 2021): Head unit has supposedly been "fixed" already, still losing all electronics, black out screen, loud and startling popping noises. Been asking Honda to fix for months, assigned a case, they just do not seem to care and now vehicle is undrivable due to loud, startling sound that may cause an accident, as well as not knowing if any of the safety electronics are working or not. It almost sounds like shorting out and that means possibility of electrical fire. Honda is dragging their feet doing ANYTHING on this obviously as this has been going on for months.
- NHTSA ID Number 11449070, January 27, 2022 (Incident Date January 26, 2022): Since new, the audio/navigation system has repeatedly turned off and on, had crackling noises emitted from the speakers and issues system warnings. I retuned my first Pilot for the same issues and now this Pilot is demonstrating the same issues. I have had the vehicle at the dealer several times and they just say that it's common with this vehicle model and the Passport with navigation systems. HONDA national service does not return calls and this issue is noted on many HONDA forums. This condition is unacceptable and dangerous.
- NHTSA ID Number 11449245, January 28, 2022 (Incident Date December 27, 2021): I was driving and a LOUD cracking popping noise started coming from the dash. The stereo went dead and the instrument panel went dead. I was startled at the noise and almost lost control of the car. I can't see my speed or other functions of the car. Honda has no permanent fix for this.
- NHTSA ID Number 11452259, February 16, 2022 (Incident Date February 9, 2022): The infotainment system makes a popping/crackling sound. The dash display and infotainment display

flickers on and off at times. This condition makes impedes the use of the the user controls and feedback systems. The vehicle went in for service on October 15, 2021 to have a technical service bulletin update implemented. The vehicle started exhibiting the issue again on February 9, 2022 in a much more extreme and severe way. It went back for service on February 15, 2022 to have the original work "inspected". The dealer said everything was fine and did nothing. Honda as implemented a couple of Technical Service Bulletins, but no permanent fix has been implemented. The dealer mentioned that they apply this TSB to approximately 2 Pilots per day.

- NHTSA ID Number 11459885, April 6, 2022 (Incident Date October 1, 2021): The infotainment screen in the vehicle which includes the backup camera display, navigation, radio, Bluetooth and other important vehicle functions and settings, shuts down and reboots in a continuous loop and sometimes turns off (blank screen) completely. This results in a backup camera function that is no longer useable as the screen does not/cannot display the camera image behind the vehicle. This is an SUV with a large rear blind spot that cannot be viewed simply by turning your head especially if there are short/small objects below the view of the rear glass. The other functions that rely on the screen also do not work and this constant rebooting/flashing is very distracting to the driver. There are also strange noises emanating from the sound system regardless of whether the system is on or off. This appears to be a widespread problem with this vehicle that still does not have a permanent solution. Several repair attempts by the OEM have not fixed this issue.
- NHTSA ID Number 11472189, July 3, 2022 (Incident Date May 10, 2022): The radio began making crackling noises. After a week or so, the entire system (navigation, clock, charging ports, dvd, radio/ sound system) stopped working completely. Shortly there after, the battery became completely drained. The dealership refused to honor the 100 month battery warranty, so I was forced to purchase a new battery. The radio & electrical system began to work again, but only for a week. Then the crackling sound began again, followed shortly thereafter with the entire system not working again.
- NHTSA ID Number 11476331, July 28, 2022 (Incident Date July 28, 2022): died and switched into neutral by itself, wouldnt start or switch into drive mode- in the middle of a busy intersection! it was scary and dangerous trunk doesn't open/close properly Infotainment center dies

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unexpectedly, freezes, won't restart on it's own. Have to pull over and restart car a few times or let the car sit off for a while speakers crackle at random times Took the car numerous times to Marin Honda, the computer they plug the car into showed "no codes" so they said there wasn't an issue. No warning lights of any kind. electrical just shuts down.

- NHTSA ID Number 11479504, August 16, 2022 (Incident Date August 12, 2022): Issues with infotainment system, a continuous crackling sound, sounds like electric spark. This occurs for several days and now the system is not working and this affects the operation of backup camera.
- NHTSA ID Number 11487405, October 1, 2022 (Incident Date July 29, 2022): When I drive the 2020 Honda Pilot it has started to make a cracking noise when I turn or go over any bumps in the road. It cuts off navigation and phone conversations from my infotainment system. The cracking noise happens if the system is on or off. It makes it difficult to even carry on a conversation with someone in the car. Not what I expected when I paid over \$40k.
- NHTSA ID Number 11487760, October 3, 2022 (Incident Date October 3, 2022): My vehicle has had repeated instances of the audio "infotainment" system causing loud, unexpected popping and crackling noises. During these instances, the infotainment system sometimes quits working completely and often the handsfree telephone function quits working. When this occurs, the volume control and audio on off button have no effect whatsoever. It can occur with or without my telephone connected to the system. The only way to temporarily correct the condition (and it only works sometimes) is to pull off the road, turn the car off completely, and then restart it. This issue has occurred during three seperate time periods, and each time, it has progressed from intermittent to continuous. The first time I took it to the dealer and they replaced some small wiring harness connectors. The second time, they had a Honda Field Engineer look at the car and replaced the entire dashboard harness system (July 2022). Then today, it began doing it again. I have reported this to my Honda Dealer (Hendrick Honda Pompano Beach, FL) and they said they are contacting Honda for more information.

2021 Honda Pilot:

- NHTSA ID Number 11374713, November 15, 2020 (Incident Date November 14, 2020): WHILE DRIVING FOR ABOUT AN HOUR ON THE FREEWAY THE SOUND TO MY BLUETOOTH AUDIO QUIT. THEN THE APPLE CARPLAY WOULD NOT CONNECT. WHEN I GOT TO THE GROCERY STORE TRYIN TO MANEAVER INTO A PARKING SPOT THE BACKUP CAMERA DID NOT WORK WHEN I PUT IN REVERSE. AT FIRST I THOUGHT I HAD PRESSED PARK INSTEAD OF REVERSE BUT THAT WAS NOT THE CASE. NOT UNTIL I PARKED, SHUT THE VEHICLE OFF AND RESTARTED IT DID EVERYTHING START WORKING PROPERLY (AT LEAST FOR NOW). THE VEHICLE HAS APPROXIMATELY 1500 MILES ON IT. I HAVE BEEN READING ABOUT A RECALL ON NEWER PILOTS (Y7Y) AND WAS WONDERING WHY MY VEHICLE IS NOT INCLUDED SINCE I AM EXPERIENCING THE SAME ISSUE. I MENTION ALSO THAT TWICE AT ABOUT 500 MILES I EXPERIENCED THE CRACKLING NOISE IN THE AUDIO THAT HAS BEEN A PROBLEM WITH THE 2018 AND NEWER PILOTS.
- NHTSA ID Number 11422110, June 24, 2021 (Incident Date April 1, 2021): The dash crackles sometimes a little and other times it crackles constantly all across the dash. If the radio is playing, it interferes with the radio or using the Bluetooth. At first it seemed like something hit the windshield and now it's worse and crackles all the time. There was a recall on this recently but not for the 2021 Pilot. This needs to be fixed. It is quite distracting and annoying.
- NHTSA ID Number 11432031, September 7, 2021 (Incident Date July 30, 2021): Loud popping and crackling noise emitting from speakers. Cannot turn them off, and causes major interruptions in navigation, radio, entertainment. Dealer said Falkra wiring is faulty, but is back-ordered, and could not even give us an estimate of when it would arrive. Essentially told us to suck it up, but it is more than distracting (my daughter actually said it gives her a headache) and I'm worried about larger (safety) issues if the wiring is indeed faulty. What if my other electrical systems malfunction as well?
- NHTSA ID Number 11452304, February 16, 2022 (Incident Date December 14, 2021): Our Pilot is brand new we started noticing popping and cracking sounds from the dashboard. It is pretty loud. We thought it was possibly the radio but it continues with the radio off. We

thought it was the dashboard contracting/expanding but it happens in all weather. It has become increasing loud and consistent and now any sounds from the stereo, regardless of input, skip and glitch and we turn it off and the popping and cracking sound continues seemingly from the speakers. We took it to the dealership for repair but they said they can't repair it. This is not acceptable for a new car.

• NHTSA ID Number 11470125, June 19, 2022 (Incident Date June 19, 2022): Unresponsive dash control screen. Hands free Bluetooth disconnects. Popping sound through speakers. CarPlay option disappears. Am/Fm radio muffles while error message states no audio available. Restarting car fixes these issues for short while. Turning off radio while engine is on does not work. Gear hunting in transmission 2,3,4 fourth gear.

2019 Honda Passport:

- NHTSA ID Number 11230644, July 10, 2019 (Incident Date July 9, 2019): NOTE. ALL HAS TAKEN PLACE WHILE IN MOTION EXCEPT FOR THE RESTART. STARTED WITH INTERMITTENT SPEAKER CRACKLES. YESTERDAY CRACKLES WITH RADIO ON REOCCURRING CRACKLES FOLLED BY INFOTAINMENT SCREAN NOTING RADIO SIGNAL LOSS FOLLED BY DATA COMMUNICATIONS LOSS. (PARAPHRASING) FOLLWED BY BLANK SCREEN. FOLLOWED BY BLANK INSTRUMENT SCREEN. FOR SOME SECONDS. THEN ALL SCREANS BECAME FUNCTIONAL. TODAY AS RADIO PLAYED THERE WAS A LOSS OF SOUND WITH VISUAL INDICATION RADIO OPERATION WAS CONTINUING AS A BUMP IN THE ROAD WAS NOTED. RADIO REMAINED SILENT TILL LATER AS ENGINE WAS RESTARTED. RADIO THEN SOUNDED THROUGH SPEAKERS.
- NHTSA ID Number 11256408, September 18, 2019 (Incident Date July 2, 2019): WHILE DRIVING IN MOTION AND RUNNING OVER SLIGHTLY BUMPY SURFACE I WILL HEAR STATIC IN THE SPEAKERS AFTER HITTING A FEW MORE BUMPS THE AUDIO WILL SHUT OFF. THEN THE INFOTAINMENT SCREEN WITH EITHER SAY 'FM RADIO UNAVAILABLE' OR 'NETWORK COMMUNICATIONS LOST' FOLLOWING THIS THE INFOTAINMENT SCREEN WILL EITHER REBOOT OR STAY OFF UNTIL THE CAR IS RESTARTED. IN SOME CASES WHEN THE

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INFOTAINMENT SCREEN WENT OFF THE DRIVER SCREEN THAT DISPLAYS SPEED, RPM AND OTHER SAFETY WARNING MESSAGE SHUTS OFF AND REBOOTS WHILE DRIVING IN MOTION WHICH IS VERY DISTRACTING AND UNSAFE. I HAVE HAD MY 2019 PASSPORT AT THE DEALER FOUR TIMES WHERE THEY HAVE CHECKED CONNECTIONS, REPLACED WIRING HARNESS AND EVEN REPLACED THE DRIVER SCREEN MODULE. WEEKS AFTER THIS LAST FIX THE SAME ISSUES HAPPENED AGAIN AND NOW BOTH SCREENS ARE BLANK AND WILL NOT COME BACK ON AFTER RESTARTING THE CAR. IT IS HEADING TO THE DEALER FOR YET ANOTHER DIAGNOSTIC. NOTE DURING MOST OF THESE ISSUES I WAS USING CAR PLAY BUT HAVE ALSO EXPERIENCED IT JUST USING FM RADIO. THE PROBLEMS USUALLY DON'T SURFACE TILL AFTER DRIVING ON A BUMPY ROAD.

NHTSA ID Number 11296948, January 3, 2020 (Incident Date December 21, 2019): STARTING AT ABOUT 500 MILES, A CRACKLING NOISE WOULD PROPAGATE THROUGH THE SPEAKERS AND THE INFOTAINMENT AND REARVIEW CAMERA WOULD SHUT OFF. TOOK THE CAR FOR SERVICE AND THE FIXED THE PROBLEM FOR A FEW HUNDRED MILES WHEN IT CAME BACK MUCH MORE SEVERE. STEPPING ON THE GAS, OR BUMPS WOULD PRODUCE ERRATIC ISSUES, NOT ONLY FREEZING THE INFOTAINMENT ALONG WITH INTENSE CRACKLING NOISES, BUT ALSO, BRAKING ON ITS OWN, TOOK THE CAR TO BACK FOR SERVICE AND THE DEALER STATED THAT THEY COULD NOT REPRODUCE THE BRAKING ON ITS OWN ISSUE. NOT UNSURPRISING BECAUSE THE PATTERN OF PROBLEMS IS RANDOM. SERVICE AT LEAST ADMITTED THE INFOTAINMENT ISSUES AND I WAS TOLD THAT THIS IS A COMMON PROBLEM THAT HONDA IS WORKING ON A REPAIR INVOLVING REPLACEMENT OF THE HARNESS. THEY WANTED TO REPLACE THE INFOTAINMENT UNIT BUT THE PART WOULD NOT BE IN STOCK FOR ALMOST 4 WEEKS. THE PROBLEMS HAVE ONLY WORSENED SINCE AND NOW BLACKING OUT OF THE SPEEDOMETER IS THE LATEST SAFETY ISSUE. CALLED HONDA AND ASKED TO HAVE THE CAR REPLACED, ONLY TO BE TOLD THAT I AM A LIAR AND THE CAR HAS NOT BEEN SERVICED ONCE YET. THE HONDA

REPRESENTATIVE PROVIDED THE MOST DISGUSTING
CUSTOMER SERVICE I HAVE EVER ENCOUNTERED DENYING
THE ISSUES AND TELLING ME THAT THERE IS NO SAFETY
ISSUE AND BASICALLY IMPLYING THAT THE INFOTAINMENT
PROBLEM ALMOST DOES NOT EXIST. HE LIED TELLING ME
THAT HONDA IS NOT WORKING ON ANY PERMANENT FIX, AS
ACCORDING TO HIM THERE IS NOT A PROBLEM. DEALER AND
SERVICE EMPLOYEES ALL KNOW THE PROBLEM, BUT HONDA
BELIEVES THAT ITS CUSTOMERS ARE IDIOTS WITH ZERO
INTELLIGENCE. MADE ME REALIZE THE IMPORTANCE OF
USING A LAWYER AND PARTICIPATING IN CLASS ACTIONS,
AS THE ONLY WAY HONDA WILL RESPOND TO THE
"ELEPHANT IN THE ROOM" IS THROUGH LEGAL ACTION. I
ALSO HOPE NHTSA WILL ACT QUICKLY ON THIS VERY WELL
KNOWN PROBLEM AND FORCE A SOLUTION.

- NHTSA ID Number 11301886, January 25, 2020 (Incident Date January 8, 2020): THE INFOTAINMENT CENTER WILL DISPLAY A CONNECTION ERROR AND THEN SHUT OFF WHILE DRIVING. THE SCREEN BEHIND THE STEERING WHEEL WILL ALSO SHUT OFF WHILE DRIVING. THE PROBLEMS SEEM TO OCCUR WHEN HITTING A BUMP IN THE ROAD SMALL OR LARGE. ALSO WHEN THIS OCCURS THE SPEAKERS WILL CRACKLE AND POP IF ANY AUDIO WAS PLAYING WHEN THE ISSUE STARTED. THE SPEAKERS OCCASIONALLY WILL CRACKLE AND POP EVEN IF THERE WAS NO AUDIO PRIOR TO THE ISSUE OCCURRING.
- NHTSA ID Number 11302157, January 27, 2020 (Incident Date January 2, 2020): WHILE DRIVING A CRACKLE IS EMITTED FROM THE FRONT SPEAKERS. THE TUNER WILL BLANK OUT AND DISPLAY "CHECK TUNER", THEN THE ENTIRE INSTRUMENT POD GOES DARK. NO SPEEDOMETER, NO OTHER INSTRUMENT INFORMATION. APPEARS TO BE DOING A REBOOT, WHILE THE CAR IS IN MOTION. SEEMS TO BE RELATED TO TURNING CORNERS OR HITTING SMALL BUMPS IN THE ROAD. VERY DANGEROUS BECAUSE IT HAPPENS AT ANYTIME, REGARDLESS OF SPEED YOU ARE TRAVELLING. SUDDENLY ENTIRE DASHBOARD IS BLACK. CAR HAS APPROXIMATELY 6,000 MILES ON IT, BUT PROBLEM BEGAN EARLIER AND HAS PROGRESSIVELY GOTTEN WORSE.

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- NHTSA ID Number 11307872, February 8, 2020 (Incident Date November 19, 2019): THE ENTIRE AUDIO/ELECTRICAL GOES OUT WHILE DRIVING. CRACKLING, POPPING SOUNDS, SOUND LIKE SMALL PEBBLES HITTING WINDSHIELD, OR ELECTRICAL SHORTS, AND THEN THE ENTIRE CONSOLE GOES OUT. BACK UP CAMERA, ALL AUDIO, NAVIGATION, SCREEN FADES IN AND OUT FEW TIMES, WITH THE SMALL CRACKLE SOUNDS. THEN USUALLY A LOUD CRACK, AND EVERYTHING GOES DARK. IF YOU PULL OVER, SHUT OFF CAR, AND RESTART, SOMETIMES IT COMES BACK. IF YOU ARE DRIVING, IT MAYBE RESTARTS IN 10-15 MINUTES, BUT WILL CONTINUE WITH SHORTING OUT AGAIN. BRAND NEW VEHICLE. BOUGHT AT THE END OF OCTOBER 2019. HONDA DOES NOT SEEM TO HAVE FIX, OR ANY CONNECTIONS TO WHY SOME VEHICLES HAVE THIS PROBLEM, AND OTHERS DO NOT. I HAVE REACHED OUT TO THE HONDA CORPORATION, WITH LITTLE RESPONSE BACK FROM THEM. OUR GARAGE IS DOING THE BEST THEY CAN, FOLLOWING BULLETINS ON UPDATES FOR WHAT OR HOW TO ATTEMPT REPAIR FROM HONDA. OUR NEW CAR HAS BEEN IN GARAGE 2 DIFFERENT OCCASIONS, NOVEMBER 2019, AND FEBRUARY 2020, FOR DAYS AT A TIME, FOR THE SAME PROBLEM. HONDA KNEW THIS WAS A PROBLEM, AND STILL SOLD VEHICLES.
- NHTSA ID Number 11308293, February 10, 2020 (Incident Date January 6, 2020): WHILE DRIVING OVER SLIGHTLY ROUGH ROADS, THE RADIO SPEAKERS WILL MAKE A CRACKLING AND POPPING NOISE. SOMETIMES TO THE POINT OF COMPLETE MALFUNCTION WHERE THE SOUND WILL GO OFF COMPLETELY AND SHOW A MESSAGE OF NO AUDIO INPUT. THE ONLY WAY TO RESET THE AUDIO IS TO STOP THE VEHICLE, SHUT OFF THE IGNITION, AND OPEN THE DRIVERS DOOR TO END THE RETAINED ACCESSORY POWER FEATURE, THEN RESTART THE VEHICLE WHICH REBOOTS THE INFOTAINMENT SYSTEM. PROBLEM WAS REPORTED TO THE DEALER SERVICE DEPARTMENT WHO SAYS THEY CAN'T REPLICATE THE PROBLEM. THIS OCCURS WHILE USING ANY AUDIO INPUT SOURCES, INCLUDING THE MAPS FEATURE IN APPLE CARPLAY. IT'S VERY DISTRACTING AND THEREFORE A POTENTIALLY DANGEROUS PROBLEM WHILE DRIVING THE

VEHICLE.

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NHTSA ID Number 11316669, March 6, 2020 (Incident Date March 6,
2020): WHILE THE VEHICLE IS RUNNING AND DRIVING, THE
INFOTAINMENT SYSTEM FAILS. THE FIRST EVENT IN THE
SEQUENCE IS THAT THE AUDIO FROM ANY SOURCE (AM, FM,
SATELLITE, IPHONE) WILL START TO CRACKLE AND
INTERMITTENTLY CUT OUT. THEN THE INFOTAINMENT
SCREEN IN THE CENTER OF DASHBOARD WILL GO DARK AND
ALL SOUND WILL STOP. ADDITIONAL EVENTS INCLUDE THE
DRIVER SCREEN (SPEEDOMETER, ETC.) BEHIND THE
STEERING WHEEL GOING DARK. SOMETIMES THE MESSAGES
'NO AUDIO SOURCE' OR 'NETWORK CONNECTION LOST' ARE
DISPLAYED ON THE SCREEN. OCCASIONALLY THE SYSTEM
WILL TRY AND REBOOT AFTER 10-15 MINUTES, WITH THE
SCREENS TURNING ON AGAIN FOR A SHORT PERIOD OF TIME
(5-10 SECONDS) BEFORE GOING DARK AGAIN. THE ONLY WAY
TO RECOVER TEMPORARILY IS TO PARK, TURN THE VEHICLE
OFF, OPEN THE DRIVER'S DOOR (SHUTS OFF RETAINED
ACCESSORY POWER) AND THEN RESTART THE VEHICLE. THIS
SYSTEM FAILURE HAPPENS WITH AND WITHOUT AN IPHONE
CONNECTED VIA GENUINE APPLE USB CABLE. NONE OF THE
FOLLOWING HAVE RESOLVED THE PROBLEM: RESETTING
THE INFOTAINMENT SYSTEM TO FACTORY SETTINGS;
DISCONNECTING THE BATTERY CABLE UNDER THE HOOD;
AND, TEMPORARILY REMOVING THE INFOTAINMENT POWER
FUSE UNDER THE HOOD. CHECKING THE SYSTEM SETTINGS
VIA THE INFOTAINMENT SYSTEM APPLICATION INDICATES
THAT THE SYSTEM IS UP TO DATE AND NO UPDATES ARE
AVAILABLE. THIS HAS BEEN HAPPENING FOR SEVERAL
MONTHS. THE HONDA DEALER SERVICE DEPARTMENT
STATED THAT THEY NEVER HEARD OF THIS ISSUE, AND
SUGGESTED THAT I FILM THE ISSUE WHEN IT OCCURS!

• NHTSA ID Number 11317033, March 9, 2020 (Incident Date February 27, 2020): WHEN USING THE AUDIO SYSTEM (APPLEAIRPLAY, BLUETOOTH, SIRIUS OR FM RADIO), THE SPEAKERS AT SOME POINT WILL BEGIN CRACKLING AND MAKING POPPING NOISES, SIMILAR TO STATIC NOISES, WHICH CAUSES THE

MUSIC TO INTERRUPT AND CUT OUT. EVEN WHEN YOU TURN THE AUDIO OFF, THE SPEAKERS CONTINUE TO MAKE THE CRACKLE AND POP SOUNDS. YOU HAVE TO TURN THE CAR OFF AND OPEN THE DOOR TO COMPLETELY CUT OFF THE AUDIO. IT HAPPENS RANDOMLY AND IS A COMPLETE DISTRACTION WHILE DRIVING. THE DISPLAY SCREEN ALSO CUTS IN AND OUT WHILE IN USE USING THE BACKUP CAMERA, MUSIC OR GOOGLE MAPS, ETC. AS WELL. THE CAR CAN BE IN MOTION OR PARKED, IT HAPPENS. THIS STARTED IN FEB 2020, 1 MONTH AFTER LEASING THE CAR AND APPROX 1000 MILES.

- NHTSA ID Number 11320010, April 2, 2020 (Incident Date November 21, 2019): WHILE DRIVING ON THE HIGHWAY MY PASSPORT, I SMELLED WHAT REMINDED ME OF ELECTRICAL WIRES SIZZLING IT WAS COMING FROM THE HONDA DISPLAY AUDIO UNIT .THE APPLE PLAY STOP WORKING AND I HAD NO AUDIO SOUND FROM THE RADIO OR OTHER APP. THE UNIT WAS UNRESPONSIVE AND REMAIN ON WITH THE ENGINE CUT OFF. THE DISPLAY WHILE NOT WORKING REMAIN ON FOR THREE DAY BEFORE TURNING OFF. THE UNIT RANDOMLY CONTINUE TO GO OUT AFTER THE SMELL OF BURNING WIRE. AND ERROR CODE BEGIN TO DISPLAY: 6382 APPEARED. THIS PROBLEM IS STILL OCCUR AND I HAD TO REPLACE MY I PHONE BECAUSE THE INSIDE OF THE PHONE WAS BURN. I DO WANT TO HAVE THE PASSPORT CAUSE HARM TO SOMEONE BEFORE CHECK THIS SAFE ISSUE OUT.
- NHTSA ID Number 11320456, April 7, 2020 (Incident Date January 20, 2020): MY COMPLAINT CONCERNS THE INFOTAINMENT SYSTEM. THE SOUND OUTPUT WILL CRACKLE, SKIP OUT OR SHUT DOWN ALTOGETHER. WHEN THIS HAPPENS, IT AFFECTS ALL OUTPUTS INCLUDING FM, SATELLITE, CARPLAY AND THE HANDS FREE. RESTARTING THE AUDIO SYSTEM DOES NOT WORK. WHEN FEASIBLE, SHUTTING OFF THE ENGINE WILL NOT RESET THE SYSTEM UNTIL THE DRIVER DOOR IS OPENED. THIS MAY OR MAY NOT FIX THE PROBLEM. THE MOST SEVERE PROBLEM OCCURS WHEN THE SPEEDOMETER INSTRUMENT PANEL GOES BLACK WHILE THE VEHICLE IS IN MOTION. THE INSTRUMENT PANEL GOING BLACK HAS

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ALWAYS OCCURRED WHILE ON THE HIGHWAY AT GREATER THAN 65MPH. THESE PROBLEMS HAVE ALWAYS HAPPENED WHEN THE VEHICLE IS IN MOTION. OCCASIONALLY IT MAY START CRACKLING AFTER HITTING A BUMP. OTHER TIMES, THERE IS NO IDENTIFIED CAUSE FOR THE DYSFUNCTION. THE ATTACHED PICTURES SHOW SOME OF THE ERROR CODES AND MESSAGES SEEN

- NHTSA ID Number 11325758, May 25, 2020 (Incident Date May 23, 2020): INFOTAINMENT SYSTEM MALFUNCTIONS CAUSING BACKUP CAMERA AND NAVIGATION SYSTEMS TO NOT FUNCTION AND SENDS LOUD CRACKLING NOISES THROUGH SPEAKERS. ALSO CAUSES INSTRUMENT PANEL TO FAIL FOR MINUTES AT A TIME. CONNECTIONS TO INFOTAINMENT AND DASHBOARD DISPLAYS FAIL WHILE IN MOTION AFTER MINOR BUMPS IN ROAD.
- NHTSA ID Number 11330554, June 24, 2020 (Incident Date June 2, 2020): INFOTAINMENT SYSTEM FAILS, SOMETIMES REBOOTS. CRACKING AND POPPING PRECEDE IT USUALLY SOUNDS AS IF IT'S COMING FROM SPEAKERS. THEN COMPLETE INFOTAINMENT LCD FAILS GOES BLACK. THIS LEAVES THE *BACKUP CAMERA* NON-FUNCTIONAL. *TR
- NHTSA ID Number 11340935, July 22, 2020 (Incident Date July 1, 2020): WHILE THE CAR IS IN MOTION THE SPEAKERS MAKE A LOUD CRACKLING AND POPPING NOISE. THE CAR AUDIO FAILS WITH AN ERROR MESSAGE THAT SAYS "RADIO UNAVAILABLE" OR "NETWORK COMMUNICATIONS LOST". THIS CAUSES ALL AUDIO TO QUIT WORKING, ALONG WITH THE BACK UP CAMERA, NAVIGATION AND BLUETOOTH. IN ADDITION, THE SPEEDOMETER FAILS AND GOES COMPLETELY BLANK WHILE DRIVING. SOMETIMES THE SYSTEM REBOOTS ITSELF AFTER STAYING DEAD FOR SEVERAL MINUTES. I HAVE TAKEN THE CAR TO THE HONDA DEALERSHIP TWICE. THEY TELL ME THEY SUBMIT VIDEOS TO THE TECH LINE OF THE PROBLEM OCCURING, BUT THEY DO NOT HAVE A SOLUTION FOR A FIX. PROBLEM STARTED WHEN VEHICLE HAD APPROXIMATELY 10,000 MILES. NOW VEHICLE HAS 32,000 MILES AND THE ISSUE HAS PROGRESSIVELY GOTTEN WORSE. THESE ISSUES OCCUR

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EVERY TIME THE CAR IS DRIVEN, WHICH IS MULTIPLE TIMES DAILY.

- NHTSA ID Number 11352026, August 29, 2020 (Incident Date August 28, 2020): I WENT TO THE STORE AND EVERYTHING WAS WORKING FINE. I NOTICED A CRACKLING SOUND WHILE TALKING ON BLUETOOTH. PARKED THE VEHICLE TO GO SHOPPING. ONCE I RETURNED THE INFOTAINMENT/INSTRUMENT CLUSTER COMPLETELY WENT DARK. INFOTAINMENT SCREEN NEVER POWERED ON. WAS UNABLE TO TURN SCREEN ON. TURNED VEHICLE ON AND OFF WITH NO SUCCESS. DROVE HOME WITH EVERYTHING COMPLETELY UNRESPONSIVE. INFOTAINMENT SYSTEM STARTED WORKING THE FOLLOWING DAY.
- NHTSA ID Number 11457936, March, 2022 (Incident Date February 18, 2022): Popping crackling noise from dashboard Screen went blank Sporadic occurrences when driving with radio On and Off Dealer says NO CODES Found?

2020 Honda Passport:

- August 5, 2020: SHORT IN THE ELECTRICAL SYSTEM CAUSES CRACKLING/POPPING TO COME OUT OF INFOTAINMENT SPEAKERS. INFOTAINMENT SYSTEM CAN BE SET TO OFF AND PROBLEM WILL STILL PERSIST. THE CRACKLING AND POPPING CAN HAPPEN RANDOMLY AND TO VARIOUS LOUDNESS LEVELS. UNDER ABRUPT BRAKING OR ROAD BUMP, PROBLEM WILL OCCUR LOUDLY. THE NOISE CAN SOUND LIKE ROAD GRAVEL HITTING WINDSHIELD AND IS VERY DISTRACTING. WEATHER, SUCH AS VERY HUMID OR RAINING CONDITIONS WORSENS THE PROBLEM AND INCREASES ODDS OF IT HAPPENING.
- October 28, 2020: STATIC, CRACKING, POPPING, AND LOSS OF INFOTAINMENT CENTER, EVEN WHEN VEHICLE IS TURNED OFF.
- September 7, 2021: Manufacturer Communication Number: A21-012 Summary Service Bulletin A loose connection in the MOST bus network is causing a popping or crackling from the speakers or no sound

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from the audio system. You may also see a Network Loss message and/or display issues. This is a known problem. On my vehicle it caused the rear camera to go out which is required safety equipment. Also the noise is so loud sometimes it startles me and I jerk the steering wheel. I have been to the dealer 2 times and they say it is a known problem but have no parts. This has been going on for over a year now and this problem need to be a safety recall.

March 31, 2022: When driving at any speed vehicle computers (system and entertainment) loose communication and malfunction, causing loss of display and function. This loss of communication causes a loud crackling & popping noise to be generated by the system through the vehicle speakers. This problem persist while driving until the vehicle is stopped, turned off and door opened. Research on Honda internet forums has revealed thousands of postings from owners with the same and similar problems. I have taken this vehicle to Honda service more than 3 times. Each time was told a manufacturing defect in wiring harness of the MOST system is the cause. Each repair has been unsuccessful in permanently correcting the defect. This problem, being random and tied to rough terrain or road bumps can happen at anytime. When this happens it is a major distraction. When system error many warnings are flashes and various vehicle features stop functioning. This affect drive system, safety system and entertainment system. It is unknown if safety systems would function when this problem is actively happening. This is the scary part of it. I have given Honda every opportunity to fix the problem. They tell me it is not a recall but is covered under an "extended service period" due to this known issue. I have seen many technical service bulletins pertaining to this issue. This needs to be elevated to a recall. I do have videos of this malfunction.

2021 Honda Passport:

• NHTSA ID Number 11431414, September 1, 2021 (Incident Date May 28, 2021): The Radio started to "crackle or skip" while using apple CarPlay. The crackle noise continued after audio had been paused. Our safety was at risk because the noise was very distracting. I needed to take my hand off the wheel to unplug my phone to stop the noise. The equipment has not been inspected. The only sign of failure were small cracks that were much more intermittent, compared to constant crackling that I am experiencing now

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NHTSA ID Number 11436749, October 11, 2021 (Incident Date October 11, 2021): The contact owns a 2021 Honda Passport. The contact stated that while driving the 49 mph they noticed their radio suddenly went off and the vehicle's instrument panel blacked out. The vehicle's horn no longer functions properly. The vehicle's windows failed to open and close and the vehicle turned completely off in the middle of the highway losing all power. The contact stated the failure caused an oncoming vehicle to end up rear-ending them. There were no injuries and no medical attention was needed. The vehicle was towed. A police report was filed. The contact took the vehicle to the dealer who was informed by the manufacturer that they were not to proceed forward with any diagnosing or repairs for the vehicle. The manufacturer was made aware of the failure and opened a case regarding the matter. The failure mileage was 3,627.

NHTSA ID Number 11477255, August 2, 2022 (Incident Date August 2, 2022): The Radio started to "crackle or skip" while using apple CarPlay. The crackle noise continued after audio had been paused. Our safety was at risk because the noise was very distracting. I needed to take my hand off the wheel to unplug my phone to stop the noise. The equipment has not been inspected. The only sign of failure were small cracks that were much more intermittent, compared to constant crackling that I am experiencing now.

2019 Honda Odyssey:

- NHTSA ID Number 11245568, August 21, 2019 (Incident Date May 10, 2019): THE INFOTAINMENT SYSTEM STARTED SHUTTING DOWN AND CRACKLING STARTED IN THE SPEAKERS WHEN THE CAR WAS 3 WEEKS OLD. THE BLUETOOTH OPTION AND APPLE CAR PLAY ARE COMPLETELY UNUSABLE DUE TO THE CRACKLING. THEY STOP WORKING APPROXIMATELY 30 SECONDS INTO USE. NO SOUND. THE ENTIRE SYSTEM WILL SHUT DOWN RANDOMLY, STATING NO NETWORK COMMUNICATION AND RADIO UNAVAILABLE BEFOREHAND. THE DEALERSHIP HAS REFUSED TO REPLACE ANY PARTS, INCLUDING THE RADIO HARNESSES, WHICH ARE THE MAIN SUSPECTS FOR THE CRACKLING. CRACKLING SOUND WORSENS DURING TURNS.
 - NHTSA ID Number 11281043, November 19, 2019 (Incident

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Date November 19, 2019): FREQUENT LOUD CRACKLING NOISES COME FROM THE SPEAKERS, FOLLOWED BY A NETWORK CONNECTION LOST ERROR MESSAGE ON THE SCREEN, AND THEN THE SCREEN WILL GO BLACK AND EVENTUALLY THE SYSTEM WILL REBOOT. THIS WILL HAPPEN REPEATEDLY WHILE DRIVING AND DOES NOT DEPEND ON THE STATE OR USE OF THE INFOTAINMENT SYSTEM (IT CAN BE OFF AND STILL HAPPEN). THERE SEEMS TO BE A CORRELATION WITH GOING OVER A BUMP, SUGGESTING A LOOSE CONNECTION SOMEWHERE. WHEN RESTARTING OR OFF, THE RADIO. CLIMATE CONTROLS AND THE BACKUP CAMERA ARE ALL UNAVAILABLE. THIS IS A SAFETY HAZARD AS IT DISTRACTS THE DRIVER AND ALSO PREVENTS USAGE OF THE BACKUP CAMERA. BEGAN HAPPENING INTERMITTENTLY AT AROUND 1500 MILES AND NOW AT ~1700 MILES IT HAPPENS ESSENTIALLY ALL THE TIME.

- NHTSA ID Number 11301355, January 23, 2020 (Incident Date June 20, 2019): OUR 2019 ODYSSEY STARTED HAVING PROBLEMS SHORTLY AFTER WE GOT IT. I TRIED TROUBLE SHOOTING MYSELF FOR AWHILE. FINALLY STARTED TAKING IT TO THE DEALERSHIP AFTER 6 MONTHS OF OWNING IT AND IT'S BEEN THERE MORE TIMES THAN I CAN COUNT. IT HAS ELECTRICAL PROBLEMS, BLUETOOTH DOESN'T WORK, THE INFOTAINMENT SYSTEM DOESN'T WORK PROPERLY. NOBODY CAN HEAR ME WHEN I TALK TO THEM THROUGH THE BLUE TOOTH OR APPLE CAR PLAY. THE POPPING IN THE DASH BOARD IS AWFUL AND IT SOUNDS LIKE THE VAN IS GOING TO CATCH FIRE AT ANY MOMENT. THEY HAVE DONE A DASH HARNESS AND FULL BODY HARNESS ON OUR VAN WITH NO SUCCESS. THESE PROBLEMS HAPPEN WHEN DRIVING AND THE POPPING IS WHEN THE INFOTAINMENT/RADIO/MUSIC IS PLAYING OR NOT PLAYING. IT'S A SERIOUS HAZARD.
- NHTSA ID Number 11343492, August 5, 2020 (Incident Date November 25, 2019): THE CENTRAL DISPLAY GOES BLANK, SOMETIMES I GET A MESSAGE NETWORK COMMUNICATIONS LOST, WHEN ITS BLANK THERE IS NO BACKUP CAMERA, RADIO, ENTERTAINMENT SYSTEM PHONE BLUETOOTH... AND EVEN WHEN THE DISPLAY WORK THE BACKUP CAMERA WILL NOT

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ALWAYS DISPLAY AND THE ENTERTAINMENT SYSTEM WILL NOT ALWAYS WORK., I ALSO HEAR A POPPING SOUND FROM THE SPEAKER SYSTEM LIKE SOME WIRES ARE LOOSE... I ALSO HAD A FEW TIMES THAT THE DASHBOARD BEHIND THE STEERING WHEEL WHERE THE SPEED AND OTHER IMPORTANT INFO ARE DISPLAYED WENT BLANK. THIS HAPPENED WHEN THE CAR WAS BRAND NEW WITH LESS THAN 500 MILES, I WENT TO SERVICE BUT IT DIDNT HELP. THE CONSUMER STATED THAT IN MARCH OF 2020, THEY WERE INFORMED THAT THEIR WAS RADIO WAS SERVICED WITHOUT FOREWARNING. *AS

- NHTSA ID Number 11320592, April 8, 2020 (Incident Date October 1, 2019): TL* THE CONTACT OWNS A 2019 HONDA ODYSSEY. THE CONTACT STATED THAT THERE WAS AN ABNORMAL POPPING SOUND COMING FROM THE DASHBOARD AND THE ELECTRONICS IN THE VEHICLE. THE VEHICLE WAS TAKEN TO HARE HONDA - SERVICE DEPARTMENT (8693 US-36, AVON, IN 46123, (317) 854-4791) WHERE AN UNKNOWN WIRING HARNESS AND INSTRUMENT PANEL WERE REPLACED HOWEVER, THE FAILURE RECURRED. THE CONTACT STATED THAT THE VEHICLE WAS THEN INCLUDED IN NHTSA CAMPAIGN NUMBER: 20V066000 (ELECTRICAL SYSTEM). THE VEHICLE WAS REPAIRED UNDER THE RECALL HOWEVER. THE FAILURE RECURRED AND WORSENED. A REPRESENTATIVE AT THE DEALER CONTACTED THE MANUFACTURER ON BEHALF OF THE CONTACT AND REQUESTED THAT A TECHNICIAN BE SENT TO INSPECT AND REPAIR THE VEHICLE. THE TECHNICIAN REPAIRED THE VEHICLE HOWEVER, THE FAILURE PERSISTED. THE MANUFACTURER WAS NOTIFIED BY THE DEALER OF THE ADDITIONAL FAILURE. THE VEHICLE WAS NOT REPAIRED. THE APPROXIMATE FAILURE MILEAGE WAS 1,498.
- NHTSA ID Number 11321405, April 17, 2020 (Incident Date February 1, 2020): THE RADIO AND COMPUTER SYSTEM CRACKLES MAKE LOUD NOISE THAT SOUNDS LIKE WIRING RUBBING TOGETHER, COMPUTER SCREEN SHUTS OFF AND RESETS AND YOU LOSE FUNCTIONALITY OF YOUR SYSTEM THAT IS CONNECTED TO RADIO, PHONES AND MAPS. THIS HAPPENS

INTERMITTENTLY AND THE VEHICLE CAN BE MOTION OR STATIONARY. *TR

- NHTSA ID Number 11386929, January 7, 2021 (Incident Date September 1, 2020): DVD PLAYER WILL NOT PLAY MOVIES. DVD PLAYER GETS EXTREMELY HOT. AUDIO THROUGHOUT ENTIRE VEHICLE EXPERIENCES A CONSTANT SNAPPING/CRACKLE NOISE. THIS HAPPENS WHILE VEHICLE IS MOVING OR STATIONARY. DOES NOT HAPPEN ALL THE TIME. PROBABLY DUE TO A PINCHED WIRE IN A HARNESS NEAR INFOTAINMENT SYSTEM. REPORTED TO DEALERSHIP. THEY REFUSED TO REPAIR UNDER WARRANTY BECAUSE VEHICLE HAD BEEN DRIVEN OVER 35,000 MILES. SPENT \$40,000 FOR A NEW VAN AND WITHIN FIRST YEAR WE NEED TO SPEND OUR MONEY TO REPAIR THEIR MISTAKE. SHAMEFUL.
- NHTSA ID Number 11415280, May 5, 2021 (Incident Date May 4, 2020): THE SCREEN ON MY VEHICLE GOES BLACK AND SHOWS "NETWORK COMMUNICATION LOST" AT RANDOM. THE SPEAKERS START MAKING A CRACKLING AND STATIC SOUND AT RANDOM AS WELL. THE SYSTEM WILL REBOOT OVER AND OVER. YOU CANNOT USE THE REARVIEW BACKUP CAMERA DURING THIS REBOOTING AND TURNING THE VEHICLE ON AND OFF DOES NOT MAKE IT START WORKING AGAIN.

2020 Honda Odyssey:

• NHTSA ID Number 11282932, November 29, 2019 (Incident Date November 25, 2019): FREQUENT LOUD CRACKLING NOISES COME FROM THE SPEAKERS, FOLLOWED BY A NETWORK CONNECTION LOST ERROR MESSAGE ON THE SCREEN, AND THEN THE SCREEN WILL GO BLACK AND EVENTUALLY THE SYSTEM WILL REBOOT. THIS WILL HAPPEN REPEATEDLY WHILE DRIVING AND DOES NOT DEPEND ON THE STATE OR USE OF THE INFOTAINMENT SYSTEM (IT CAN BE OFF AND STILL HAPPEN). THERE SEEMS TO BE A CORRELATION WITH GOING OVER A BUMP, SUGGESTING A LOOSE CONNECTION

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SOMEWHERE. WHEN RESTARTING OR OFF, THE RADIO, CLIMATE CONTROLS AND THE BACKUP CAMERA ARE ALL UNAVAILABLE. THIS IS A SAFETY HAZARD AS IT DISTRACTS THE DRIVER AND ALSO PREVENTS USAGE OF THE BACKUP CAMERA. BEGAN HAPPENING INTERMITTENTLY AT AROUND 1500 MILES AND NOW AT ~1700 MILES IT HAPPENS ESSENTIALLY ALL THE TIME. PLEASE ADDRESS THIS ISSUE SOONEST POSSIBLE. MANY PEOPLE BUYING HONDA CARS AND NOT AWARE OF THESE ISSUES !!!

- NHTSA ID Number 11338423, July 9, 2020 (Incident Date May 7, 2020): THE CAR IS MAKING A CRACKLING NOISE FROM THE DASH BROAD. TOOK IT TO THE DEALERSHIP AND THE LATTER STATED THAT HONDA IS AWARE OF THE ISSUE AND THAT THE CRACKLING/SPARKLING NOISE COME FROM THE SPEAKERS. HE FURTHER STATED THAT HONDA IS WORKING WITH NHTSP ON A FIX. THE NOISE ACCENTUATES WHEN THE DRIVER STEPS ON THE BRAKES, BUT ALSO WHEN S/HE SPEEDS UP.
- NHTSA ID Number 11338392, July 9, 2020 (Incident Date June 9, 2020): I PURCHASED AN ODYSSEY AND WITHIN LESS THAN 2 WEEKS, THE INFOTAINMENT SYSTEM STARTED DISPLAYING PROBLEMS. THE SYSTEM GIVES A LOUD, CRACKLING NOISE OVER THE SPEAKERS. SOMETIMES THE AUDIO CONNECTION WILL CUT OUT WITH VARYING ERROR MESSAGES. OTHER TIMES THE ENTIRE SCREEN WILL GO BLACK/TURN OFF FOR SEVERAL MINUTES, COMPLETING DISABLING THE BACKUP CAMERA AND OTHER FUNCTIONS. WHEN THE AUDIO GOES OUT IT WILL ALSO HANG UP/DISABLE ANY GOES GOING OVER ANDROID AUTO OR BLUETOOTH. THE AUDIO DISPLAY SCREEN FOR ANDROID AUTO WILL SOMETIMES FREEZE. I'VE ALREADY HAD MY VEHICLE IN THE SHOP TWICE FOR THIS PROBLEM WITHIN A MONTH AND A WEEK OF OWNING THE CAR AND THERE'S BEEN NO RESOLUTION YET. I'VE SEEN THAT THERE'S A CLASS ACTION LAWSUIT FOR THIS EXACT PROBLEM IN THE 2018 AND 2019 MODELS, WHICH APPARENTLY DID NOT GET RECTIFIED FOR 2020. THE PROBLEM OCCURS RANDOMLY AND SPORADICALLY, BUT DOES OCCUR ALMOST EVERY SINGLE TIME I DRIVE THE CAR

AT SOME POINT OR ANOTHER. IT'S EXTREMELY DISTRACTING AND NOT SAFE.

- NHTSA ID Number 11350124, August 18, 2020 (Incident Date August 15, 2020): WHILE DRIVING ON INTERSTATES AND LOCAL ROADS, THE ONBOARD "INFOTAINMENT" SYSTEM CONTINUALLY EMITS LOUD POPPING, CRACKLING SOUND (SOUNDS LIKE THINGS HITTING WINDSHIELD), RESULTING IN DISTRACTION AND CONFUSION WHILE DRIVING. VARIOUS COMPONENTS OF THE INFOTAINMENT SYSTEM RANDOMLY GO OUT, CAUSING SYSTEM REBOOTS WHILE DRIVING AND CREATING DISTRACTION. NAVIGATION SYSTEM IS ALSO SOMETIMES AFFECTED, FAILING TO PROVIDE TURN GUIDANCE OR GIVE ACCURATE LOCATION. REAR "CABIN VIEW" FREEZES INTERMITTENTLY, DISPLAYING ONLY STILL IMAGE RATHER THAN VIEW OF REAR SEATS. FM RADIO RANDOMLY CUTS OUT, DISPLAYING "NO AUDIO CONNECTION FOR FM".
- NHTSA ID Number 11365120, October 19, 2020 (Incident Date October 16, 2020): PURCHASED BRAND NEW MARCH 2020.
 EXPERIENCING ISSUES WITH RADIO STATIC, POPPING NOISES FROM SPEAKERS, RADIO NOT FOUND ERROR MESSAGE WHILE DRIVING. RADIO STILL RUNNING AFTER CAR IS TURNED OFF AND DOORS ARE OPENED. WE HAVE TO TURN THE CAR BACK ON AND OFF AGAIN TO GET THE RADIO TO SHUT OFF. ISSUES WORSENED AFTER RECALL WORK WAS COMPLETED.
- NHTSA ID Number 11375340, November 19, 2020 (Incident Date September 4, 2020): DEFECTIVE 2020 HONDA ODYSSEY RECEIVED BRAND NEW JUNE 9. BEGAN HAVING ISSUES IN 2 MONTHS. SERVICED AT BAYTOWN, TX COMMUNITY HONDA ON 9/11, 9/24,9/17,10/16 FOR OCCURRING ISSUE. PROBLEM HAS NOT BEEN RESOLVED. VIDEO DOCUMENTATION WITH TIME STAMP OF ISSUE IS SAVED. CASE OPEN WITH AMERICA HONDA: CASE MANAGER, ANTONIO DETERMINED THE HONDA TECHS AT THE DEALER ARE INCORRECTLY FIXING THE VAN. THE FAKRA CONNECTOR NEEDS TO BE REPLACED. HE WILL SUBMIT REQUEST TO FIELD MANAGER TEAM FOR A FIELD ENGINEER TO BE SCHEDULED TO SERVICE MY VAN.

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- ANTONIO, CASE MANAGER, ALSO ADVISED TO CANCEL 11/19 APPOINTMENT WITH SERVICE DEPARTMENT AND TO WAIT FOR CALL BACK FOR HONDA FIELD ENGINEER. COSTUMER REQUESTED ETA, ANTONIO WOULD NOT PROVIDE ESTIMATED TIME, ADVISE TO WAIT FOR A CALL. POPPING NOISE, DISCONNECTS BLUETOOTH. POPPING NOISE OCCURS WHEN DRIVER IS ON A CALL, LISTENING TO MUSIC, AND EVEN DURING COMPLETE SILENCE THERE IS POPPING. ELECTRICAL ISSUE OCCURS DURING STATIONARY, IN MOTION, ON A CITY, HIGHWAY, AND TURNING. THE PROBLEM IS UNSAFE BECAUSE BLUETOOTH CONNECTION IS NOT WORKING PROPERLY WHICH PREVENTS ME TO SAFELY USE HAND FREE CALLING. THIS IS ILLEGAL IN THE STATE OF TEXAS. THE HONDA ODYSSEY 2020 CURRENTLY HAS 7298 MILES.
- NHTSA ID Number 11431882, September 6, 2021 (Incident Date August 2, 2021): Infotainment system failure. It started by popping and crackling then the entire screen and entertainment system went black. No radio, Bluetooth, backup camera or any of the controls on the infotainment system screen.
- NHTSA ID Number 11459395, April 3, 2022 (Incident Date December 1, 2021): Non-working touchscreen monitor (navigation, radio, heat/ac adjustments, everything on screen off and won't turn on. The usb outlets, backup camera, rear tv are also all non-working. Issue with doors, van beeps twice when walking away from vehicle, like one is not shut properly even after you open and shut all doors again. Also rear sliding doors don't shut sometimes and act like there is something in the way of it closing and reopening. Available anytime on Friday for inspection. Safety issue only with backup camera. Prefer the convenience of having one to see behind me better. Mirrors ok but camera better. Problem was fixed twice at Honda dealership in Jonesboro Ar. They said it was a recall. The solution to the recall only fixed it temporarily though. The same above issues continue to reoccur even after repair. Scheduled and went into Honda for the third time for the same issue and the dealership sent me away. This time they said they wouldn't be able to fix again until someone (an engineer) from corporate could come out and look at my car. This hasn't occurred and it's been over two months. They said they have a new service manager and they are looking into it. I've called a

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number of times and I am just told their new and their trying to figure out who to contact. Issues started out with popping and crackling noise in speakers. Then the touchscreen monitor would say no audio connection. The rear tv would go on and off too. Then the touchscreen just died and nothing works now. It doesn't even turn on. Just black screen. So I have a non-working touchscreen, navigation, radio, back up camera, heat/air adjustments, all components on the touchscreen are non-working. USB ports are non-working. Rear tv is non-working.

2021 Honda Odyssey:

• NHTSA ID Number 11435468, October 4, 2021 (Incident Date September 15, 2021): The 'infotainment' system turned off stating "network connection lost." The speakers then started making a VERY loud crackling sound that could not be controlled with the volume button. It was very distracting to the driver--sounded like rocks hitting the windshield. When the infotainment system was off, the blindspot monitor and back-up camera stopped functioning. This has happened several times.

2022 Honda Odyssey:

• NHTSA ID Number 11477139, August 2, 2022 (Incident Date July 28, 2022): i own a honda odyssey elite 2022. for no reason the GPS and Radio screen in the vehicle went out while i am driving. i spoke to MS. Priecilla on 8/1/2022 working in America Honda Motor in Torran, California addrising her the setuation of the vehicle after i Googled it, and fuond that this problem is in all the pilote and odyssey vehicles since 2019. i asked her if she is aware of this problem she said no, and this is the first time she here something like that. I told her to google it because this problem is there since 2019 and the honda dealer is not taking of this issue since 2019. i opened a case with honda dealer in california and the case # 131-784-33. saturday the 8/6/2022 i am gonna take to woodhaven dealer in new york to check the problem and check why the screen go out. it is a very important to check that safty of the cars made by honda. send all owner of this models a note or advice what to do if they have same issues. also this days all cars are computerized and any thing wrong in the computer might put the drivers and passangers in danger if they didnot take care of it from the manifacture to help the owner and driver of the honda. thanks, M. Dalia.

- 28. In fact, in a Spring of 2022 Honda has settled two class action lawsuits, (1) *Banh v. American Honda Motor Co. Inc.*, Case No. 2:19-cv-05984, filed in the United States District Court for the Central District of California, involving 2019-2020 Acura RDX vehicles,² and (2) *Conti, et al. v. American Honda Motor Co., Inc.*, Case No. 2:19-cv-02160-CJC-GJS, filed in the United States District Court for the Central District of California, involving certain 2018-2019 Honda Odyssey, 2019 Honda Pilot, and 2019 Honda Passport vehicles,³ that alleged those vehicles too suffered from the Electrical Defect, amongst other defects.
- 29. Indeed, the *Conti* motion for preliminary approval of class settlement, that had subsequently been granted, specifically references Honda's acknowledgment of the crackling and popping noises within certain Honda and Acura vehicles: "an Acura Service Bulletin covered by the *Banh* settlement, 20-031 (popping/crackling from the speakers; blank display, no sound from the audio system, network loss message), addresses the same issues as Service Bulletins relevant to *Conti. See* Honda Service Bulletins 20-049 (popping or crackling from the speakers, no sound from the audio system, network loss message and/or display issues); and 20-058 (popping or

² https://www.settlement-

claims.com/infotainment/asset/Corrected%20Second%20Amended%20Class%20Action%20Compla int.pdf (last visited Oct. 10, 2022).

³ https://www.settlement-

claims.com/infotainment/asset/honda/Notice% 20of% 20Motion% 20for% 20Prelim% 20Approval% 20 of% 20Class% 20Settlement% 20and% 20Direction% 20of% 20Notice% 20Under% 20Fed% 20R% 20CI V% 20P% 2023(e).pdf (last visited Oct. 10, 2022).

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crackling from the speakers, no sound from the audio system, network loss message and/or display issues)."4

30. The Banh and Conti class action settlements do not include the Class Vehicles.

B. Honda's Failure to Fix the Defect

- 31. Honda admitted the Electrical Defect exists and attempted to remedy it by addressing what Honda deemed to be a loose connection within the Vehicles' electrical systems.
- In March and May 2019, and before Plaintiffs bought their car, based on 32. the volume of consumer complaints it received, Honda engineers conducted an analysis of the problems with the Honda vehicles electrical systems that caused such vehicles to make popping or crackling noises from the speakers and/or produce no sound from the speakers and attempted to provide a solution. As a result of its investigation, Honda released to its authorized dealerships a "ServiceNews Article" titled "Popping or Crackling from the Speakers? Check the MOST Bus Network," that applied to the 2018-19 Odyssey (all trims except LX), 2019 Pilot (all trims except LX), and 2019 Passport (all trims except Sport) as vehicles. The article states:

⁴ https://www.settlement-

claims.com/infotainment/asset/honda/Notice%20of%20Motion%20for%20Prelim%20Approval%20 of%20Class%20Settlement%20and%20Direction%20of%20Notice%20Under%20Fed%20R%20CI V%20P%2023(e).pdf (last visited Oct. 10, 2022).

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Are you hearing a popping or crackling from the speakers? This may be due to a connection issue in the MOST bus network, which can be identified by the unique red and green connectors at each component of the infotainment system.

During component inspection or replacement, you can easily damage these connectors if the cable is used for leverage when unplugging them.

To save you time during troubleshooting, check the repair history on the vehicle. Most reported cases happened after a separate previous repair was made to the system. Be sure to inspect the MOST connectors at all components and any connections between the harnesses. If a connector is found to be damaged, like you see here, the entire harness must be replaced. These connectors are not repairable.



If you want more info on what the MOST bus network does, look up the Tech2Tech® video, "Lets Talk MOST Bus Network and ECL Diagnostics." And If you want to know how to check for damaged or loose connections, be sure to check out "A Look at MOST Bus Network Connectors."

33. Then, following additional investigation, on August 4, 2020, Honda issued to its dealers a Technical Service Bulletin ("TSB") No. 20-058, Version 1 (titled "Popping or Crackling from the Speakers; No Sound from the Audio System; Network Loss Message and/or Display Issues"), where it stated that "there is a loose

the bulletin affected certain 2019-2021 Honda Pilot and 2019-2020 Honda Passport

According to Honda's TSB No. 20-058, Version 1, the issues covered in

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35. As a corrective action, Honda instructed its authorized dealers to "[i]nstall the FAKRA connector set and the MOST service cords."36. Subsequently, Honda revised TSB No. 20-058 on September 8, 2020 and

September 10, 2020, wherein it supplemented the repair instructions and parts

connection in the MOST bus network."

- 37. Then, on February 18, 2021, Honda issued to its dealers a TSB No. 21-013, Version 1 (titled "Warranty Extension: 2018-20 Odyssey MOST Bus Network Connectors"), covering certain 2018-2020 Honda Odyssey vehicles, where it stated that a "loose connection in the MOST bus network is causing a popping or crackling from the speakers or no sound from the audio system" and that "[t]here may also be a Network Loss message and/or display issues."
- 38. Just like in its TSB No. 20-058, in this TSB No. 21-013, as corrective action, Honda instructed its authorized dealers to "[i]nstall the FAKRA connector set and the MOST service cords."
 - 39. Notably, in that TSB Honda cautioned its dealerships to "make sure the

harness is routed correctly, as a missrouted harness can put pressure on the connectors which may cause a connection issue," and "not pull on the units while the FAKRA connectors are connected to help prevent communication issues."

- 40. The same day, on February 18, 2021, Honda revised TSB No. 20-058 for the fourth time by supplementing the repair instructions and parts information, and referring its dealerships to a communication by Brad Ortloff, Manager of Honda's Auto Campaign Administration Department, wherein Honda announced an extension of the warranty for the MOST bus network connectors on certain 2018-2020 Odyssey, 2019-20 Passport, and 2019-20 Pilot vehicles to 5 years or 60,000 miles from the original date of purchase, whichever comes first (hereafter "Extended Warranty").
- 41. Additionally, Honda revised this TSB to include a caution to its dealerships to "make sure the harness is routed correctly, as a misrouted harness can put pressure on the connectors which may cause a connection issue," and "not pull on the units while the FAKRA connectors are connected to help prevent communication issues."
- 42. On May 3, 2021, Honda revised TSB No. 20-058 for the fifth time by including all 2020 and 2021 Honda Passport vehicles in the list of affected vehicles.
- 43. On July 12, 2021, Honda issued a second revision of its TSB No. 21-013 wherein Honda, under corrective action, dropped the requirement for its dealers to replace the MOST service cords in affected vehicles and install the FAKRA

connection set only.

- 44. However, as evident from Plaintiffs' experience and those of other consumers, and from subsequently issued Job Aid by Honda, the replacement of MOST service cords FAKRA connectors failed to correct the Electrical Defect.
- 45. Specifically, in September 2021, Honda issued to its dealerships a Job Aid tiled "MOST Bus Network: Overview, Troubleshooting, and Repairs" covering the 2018 and later Honda Odyssey, 2019 and later Honda Passport, and 2019 and later Honda Pilot, where Honda warned its dealerships that improper connections or improper harness routing may result in the Electrical Defect manifesting itself: "popping or crackling noises from the speakers, a blank center display unit, or the sound cutting off."
- 46. Although Honda knew of such Electrical Defect at least as of March and May 2019 in the model year vehicles that precede the Class Vehicle, when Honda published a "ServiceNews Article" titled "Popping or Crackling from the Speakers? Check the MOST Bus Network," and at least as August 4, 2020, in the Class Vehicles, when Honda published to its dealers TSB No. 20-058 (and sooner as Honda gathered information and data to prepare such bulletin), Honda did not disclose the Electrical Defect to consumers at the time of sale or lease.
- 47. Thus, the issuance of the 2019 "ServiceNews Article," of the TSB No. 20-058 and TSB No. 21-013, and amendments thereto, suggest a gathering of data and

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information regarding the Electrical Defect and establishes Honda's superior knowledge of a defect that would not be readily available to the Plaintiffs and other consumers.

C. Honda has Actively Concealed or Suppressed the Defect

- 48. While Honda has been fully aware of the Electrical Defect in the Class Vehicles, it actively concealed the existence and nature of the defect from Plaintiffs and Class Members at the time of purchase, lease or repair and thereafter.
- Specifically, Honda failed to disclose or actively concealed at and after 49. the time of purchase, lease, or repair:
 - a. any and all known material defects or material nonconformity of the Class Vehicles and of their electrical systems;
 - b. that the Class Vehicles were not in good in working order, were defective, and were not fit for their intended purposes; and
 - c. that the Class Vehicles and their electrical systems were defective, despite the fact that Honda learned of such defects through alarming failure rates, customer complaints, as well as through other internal sources, as early as 2019.
- Honda is, of course, currently aware that the electrical systems in the 50. Class Vehicles are malfunctioning in record numbers. But for years Honda did

nothing other than instruct its dealers to replace a number of connectors, which does not cure the defect.

51. The Plaintiffs and members of the Class would not have purchased the Class Vehicles, or would have paid less for the Class Vehicles, had they known, prior to their respective time of purchase or lease, of the Electrical Defect in the Class Vehicles.

D. Honda's New Vehicle Limited Warranty

- 52. Prior to purchasing their vehicles, Plaintiffs relied upon Honda's representations of a New Vehicle Limited Warranty that accompanied the sale of their vehicles, and such representations were material to Plaintiffs' decision to purchase their vehicles.
- 53. Specifically, each Class Vehicle sale or lease is accompanied with Honda's 3-year / 36,000-mile New Vehicle Limited Warranty.
- 54. The terms of Honda's New Vehicle Limited Warranty are contained in the warranty booklet that Plaintiffs and all class members received at the time they purchased or leased the Class Vehicles.
- 55. Honda's warranty booklet sets forth the terms of its New Vehicle Limited Warranty as follows:⁵

⁵ A true and correct copy of the New Vehicle Limited Warranty is available at https://owners.honda.com/Documentum/Warranty/Handbooks/2020_Honda_Warranty_Basebook_R ev02_FINAL_-_SIS.pdf (last visited Jun. 30, 2022);

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General Warranty Provisions

The warranty coverages in this booklet are offered only to the owner or lessee of a [2020 / 2021 / 2022] Honda automobile. To be covered, the vehicle must be distributed by American Honda through the Honda Automobile Division, and sold or leased by an authorized Honda automobile dealer in the United States, Puerto Rico, the U.S. Virgin Islands, Guam, and the Commonwealth of the Northern Mariana Islands.

* * *

New Vehicle Limited Warranty

Your vehicle is covered for 3 years or 36,000 miles, whichever comes first. Some parts may have separate coverage under other warranties described in this booklet.

Warranty Coverage

Honda will repair or replace any part that is defective in material or workmanship under normal use.

* * *

How to Get Warranty Service

You should take your vehicle, along with proof of the purchase date, to an authorized Honda automobile dealer during normal service hours.

56. Further, Honda's authorized dealers expressly assented to perform warranty repairs on the Class Vehicles, necessary to bring Honda in compliance with the Honda's express warranty.

https://owners.honda.com/Documentum/Warranty/Handbooks/2021_Honda_Warranty_Basebook_Petrol_Hybrid_PHEV.pdf (last visited Jun. 30, 2022);

https://owners.honda.com/Documentum/Warranty/Handbooks/2022_Honda_Warranty_Basebook.pd f (last visited Oct. 10, 2022).

- Honda controls execution of all warranty repairs by its dealers, as it 57. provides training, materials, special tools, diagnostic software, and replacement parts to its dealers, and demands that the warranty repairs be performed in a strict accordance with its repair guidelines, Technical Service Bulletins, Job's Aids, and other instructions.
- 58. In return, Honda pays its authorized dealerships a monetary compensation for such warranty repairs.
- Therefore, Honda's authorized dealers are its agents four purpose of 59. vehicle repairs, and knowledge of a defect reported to any such dealer can be imputed to Honda.

E. Allegations Applicable to Plaintiffs Jennifer and Sean Fausto

- 60. On or about August 27, 2020, Jennifer Fausto and Sean Fausto (the "Fausto Plaintiffs") purchased a new 2020 Honda Pilot Touring vehicle, Vehicle Identification Number 5FNYF6H98LB017934 (the "Fausto Vehicle") from Jeff Wyler Superior Honda in Cincinnati, Ohio, an authorized dealership of Honda (hereafter "Wyler"), primarily for personal, family, or household purposes.
- 61. Prior to purchasing the Fausto Vehicle, the Fausto Plaintiffs researched the features and benefits of the 2020 Honda Pilot including which trim levels came with the infotainment system, reviewed the Monroney sticker for the 2020 Honda

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Pilot, and spoke with the Wyler dealership's salesperson about the vehicle's features including the infotainment system, prior to purchasing the vehicle.

- 62. At the time the Fausto Plaintiffs purchased their vehicle, Wyler made representations as to the vehicle's performance and quality and assured the Fausto Plaintiffs that it was accompanied by Honda's New Vehicle Limited Warranty and was free from defects of workmanship.
- The Fausto Plaintiffs still own their 2020 Honda Pilot. Unknown to the 63. Fausto Plaintiffs at the time they purchased the vehicle, the 2020 Honda Pilot suffered from (and for years continued to suffer from) a defective infotainment system, which has caused attempted repairs, overpayment, and diminished value of the 2020 Honda Pilot. The Fausto Plaintiffs were also deprived of the benefit of their bargain. Honda knew about this defect at the time the Fausto Plaintiffs purchased the vehicle but did not disclose it to them. Thus, the Fausto Plaintiffs purchased the 2020 Honda Pilot on the reasonable but mistaken belief that it would be safe and reliable on public roadways and was not subject to any known defects.
- 64. The Fausto Plaintiffs selected and ultimately purchased the 2020 Honda Pilot, in part, because of the features of the infotainment system.
- 65. Prior to their purchase, the Fausto Plaintiffs reviewed the features, specifications, and benefits of the 2020 Honda Pilot as described by Honda and its dealership, including the benefits of the infotainment system. None of Honda's

advertisements or marketing information or the representations received by the Fausto Plaintiffs from the Wyler dealership prior to the purchase contained any disclosure relating to any defects in the infotainment system. Had Honda disclosed that the infotainment system in their vehicle was defective, the Fausto Plaintiffs would not have purchased the 2020 Honda Pilot or would have paid less for the vehicle.

- 66. After purchasing the vehicle, the Fausto Plaintiffs began experiencing the Electrical Defect. Specifically, the vehicle repeatedly made popping and crackling noises and the center infotainment screen repeatedly went dark and failed.
- On July 20, 2021, when the Fausto Vehicle's mileage was 16,033 miles, 67. the Fausto Plaintiffs brought the vehicle to Wyler and complained that the vehicle's speakers repeatedly made popping and crackling noises. In response, the dealership inspected the vehicle, found a loose connection is the MOST bus network, and attempted a repair by replacing the FAKRA connectors
 - 68. The Electrical Defect continued to manifest thereafter.
- On January 4, 2022, when the Fausto Vehicle's mileage was 28,302 69. miles, the Fausto Plaintiffs again brought their vehicle to Wyler and complained that the vehicle continued to make popping and crackling noise. In response, the dealership verified their complaint and attempted a repair by ordering a new rear entertainment control unit because the part was on backorder.

- 70. On January 13, 2022, when the Fausto Vehicle's mileage was 28,577 miles, the Fausto Plaintiffs brought their vehicle to Wyler and complained that their vehicle made popping and crackling noises and the infotainment system would shut down abruptly. The dealership attempted a repair by replacing the rear entertainment control unit.
 - 71. The Electrical Defect continued to manifest thereafter.
- 72. On April 5, 2022, when the Fausto Vehicle's mileage was 33,804 miles, the Fausto Plaintiffs brought their vehicle to Wyler and complained that their infotainment screen repeatedly went black and was inoperable. The dealership attempted a repair by replacing the display screen and control unit. The vehicle was out of service until April 14, 2022.
 - 73. The Electrical Defect continued to manifest thereafter.
- 74. On May 23, 2022, when the Fausto Vehicle's mileage was 36,766 miles, the Fausto Plaintiffs took their vehicle to Wyler and complained that the vehicle was still making popping and crackling noises and the infotainment screen was still going black and failing. In response, the dealership inspected the tuner and stereo amplifier and determined that the MOST connector at the amplifier had a sharp bend in the wire which placed pressure on the connector and caused signal loss and display issues. The dealership attempted a repair by straightening the connector wires, clearing the data on the infotainment unit and performing a software update. The associated technical

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service bulletin noted this was the fifth visit for the same concern. The vehicle was out of service until May 26, 2022.

- 75. The Electrical Defect continued to manifest thereafter.
- On September 14, 2022, when the Fausto Vehicle's mileage was 43,921 76. miles, the Fausto Plaintiffs brought the vehicle to Wyler and complained that the vehicle still makes a popping and crackling noise. In response, the dealership watched a video taken by the Fausto Plaintiffs showing continued crackling and popping noises and found the infotainment unit had critical unlock codes stored. The dealership contacted Honda's Tech Line department and, per Honda's request, took photographs of the FAKRA connectors and the harness routing behind the dashboard, audio unit, gauge control module, Blu-Ray player and telematics control unit, and sent the photographs to Tech Line for review.
 - The Electrical Defect continued to manifest thereafter. 77.
- On November 2, 2022, when the Fausto Vehicle's mileage was 46,942 78. miles, the Fausto Plaintiffs brought their vehicle back to Wyler and complained that the vehicle continued to make popping and crackling noises. The dealership noted that it had already replaced the vehicle's speakers, MOST connectors, and the audio unit and asked Honda's Tech Line department for approval to perform another goodwill repair on the vehicle.
 - 79. The Electrical Defect continued to manifest thereafter.

- 80. On January 9, 2023, at which point the Fausto Vehicle's mileage was 50,627 miles, the Fausto Plaintiffs took the vehicle back to Wyler because it continued to make popping and crackling noises. In response, Wyler scanned the vehicle, confirmed the Fausto Plaintiffs' complaint and that the FAKRA connections had already been replaced and there were indications of side loading and tension on the connectors, consulted with Honda's Tech Line departments, and per Honda's recommendation they attempted a goodwill repair by replacing the dashboard wiring harness. The vehicle was out of service until January 11, 2023.
- 81. Thereafter, the car currently continued to make popping and cracking sounds out of the speakers and the screen continued to go black.
- 82. In late 2023, by which point the Fausto Plaintiffs had sought repairs from Honda dealerships on seven different occasions and their warranty period had already expired, Honda eventually issued a recall regarding the Electrical Defect. The recall notice notes that Honda had begun investigating the Electrical Defect on February 1, 2019 after it "received a quality report on audio and display flickering issues and observed a potential trend." The Fausto Plaintiffs had the recall repair performed in February 2024.
- 83. By a letter dated October 20, 2023, the Fausto Plaintiffs, via their counsel, informed Honda that their vehicle had been subject to repeated repairs due to the Electrical Defect and same defect persists.

- 84. The defects experienced by the Fausto Plaintiffs substantially impair the use, value, and safety of their vehicle to them.
- 85. The Fausto Plaintiffs have suffered an ascertainable loss as a result of Honda's omissions associated with the infotainment system, including but not limited to, overpayment, attempted repairs, and diminished value of their vehicle.
- 86. The Fausto Plaintiffs could not reasonably have discovered said nonconformities prior to their acceptance of the vehicle.
- 87. Neither Honda nor any of its agents, dealers, or other representatives informed the Fausto Plaintiffs of the existence of the infotainment system's Defect prior to selling the vehicle.

CLASS ACTION ALLEGATIONS

A. The Class

88. Plaintiffs bring this action on their own behalf, and on behalf of the following class pursuant to Fed. R. Civ. P. 23(a), 23(b)(2), and/or 23(b)(3):

<u>Ohio Class</u>: All persons or entities who purchased or leased any 2020-2022 Honda Pilot (all except LX), 2020 Honda Passport (all except Sport), 2021-2022 Honda Passport, and 2020-2022 Honda Odyssey (all except LX) vehicles in the State of Ohio (the "Ohio Class").

89. Defendant and its employees or agents are excluded from the Class.

B. Numerosity

90. Upon information and belief, each of the Class is so numerous that joinder of all members is impracticable. While the exact number and identities of

individual members of the Class are unknown at this time, such information being in the sole possession of Defendant and obtainable by Plaintiffs only through the discovery process, Plaintiffs believe, and on that basis allege, that at least tens of thousands of Class Vehicles have been sold and leased in Ohio.

C. Common Questions of Law and Fact

- 91. There are questions of law and fact common to the Class that predominate over any questions affecting only individual Class members. These questions include:
 - a. whether the Class Vehicles suffer from the Electrical Defect;
 - b. whether the Electrical Defect constitutes an unreasonable safety hazard;
 - c. whether Defendant knows about the Electrical Defect and, if so, how long Defendant has known of the Defect;
 - d. whether the defective nature of the Class Vehicles' electrical systems components constitutes a material defect;
 - e. whether Defendant had and has a duty to disclose the defective nature of the Class Vehicles' electrical systems components to Plaintiffs and the other Class Members;
 - f. whether Plaintiffs and the other Class Members are entitled to equitable relief, including, but not limited to, a preliminary and/or permanent injunction;

- g. whether Defendant knew or reasonably should have known of the Electrical Defect contained in the Class Vehicles before it sold or leased them to Class Members; and
- h. Whether Defendant breached its express warranty and the implied warranty of merchantability, engaged in fraudulent concealment and unjust enrichment, and whether Defendant violated the Ohio Consumer Sales Practices Act, Ohio Rev. Code § 1345.01, et seq.

D. Typicality

92. The Plaintiffs' claims are typical of the claims of the Class since
Plaintiffs purchased or leased a defective Class Vehicles, as did each member of the
Class. Furthermore, Plaintiffs and all members of the Class sustained economic
injuries arising out of Defendant's wrongful conduct. Plaintiffs are advancing the
same claims and legal theories on behalf of themselves and all absent Class members.

E. Protecting the Interests of the Class Members

93. Plaintiffs will fairly and adequately protect the interests of the Class and have retained counsel experienced in handling class actions and claims involving unlawful business practices. Neither Plaintiffs nor their counsel have any interests which might cause them not to vigorously pursue this action.

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FIRST CAUSE OF ACTION

F. Proceeding Via Class Action is Superior and Advisable

- 94. A class action is the superior method for the fair and efficient adjudication of this controversy. The injury suffered by each individual Class member is relatively small in comparison to the burden and expense of individual prosecution of the complex and extensive litigation necessitated by Defendant's conduct. It would be virtually impossible for members of the Class individually to redress effectively the wrongs done to them. Even if the members of the Class could afford such individual litigation, the court system could not. Individualized litigation presents a potential for inconsistent or contradictory judgments. Individualized litigation increases the delay and expense to all parties, and to the court system, presented by the complex legal and factual issues of the case. By contrast, the class action device presents far fewer management difficulties, and provides the benefits of single adjudication, an economy of scale, and comprehensive supervision by a single court. Upon information and belief, members of the Class can be readily identified and notified based on, inter alia, Defendant's vehicle identification numbers, warranty claims, registration records, and database of complaints.
- 95. Defendant has acted, and refused to act, on grounds generally applicable to the Class, thereby making appropriate final equitable relief with respect to the Class as a whole.

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(Plaintiffs on behalf of Ohio Class)

- 96. Plaintiffs incorporate by reference all allegations contained in this Amended Complaint as though fully stated herein.
- 97. By failing to disclose and concealing the defective nature of the Class Vehicles' electrical systems components from Plaintiffs and Class Members in its advertising and other forms of communication, including standard and uniform material provided with each car and on its website, Honda concealed and suppressed material facts concerning the performance and quality of the Class Vehicles.
- 98. Defendant knew that the Class Vehicles' electrical systems components suffered from an inherent defect in material or workmanship, were defectively manufactured or made, would fail prematurely, and were not suitable for their intended use, when it made its representations on the material provided with each car and on its website.
- 99. Defendant was under a duty to Plaintiffs and Class Members to disclose the defective nature of the Class Vehicles' electrical systems components and/or the associated repair costs because:
 - a. Defendant was in a superior position to know the true state of facts about the safety defect contained in the Class Vehicles' electrical systems components;

- b. The defect created a safety hazard and Plaintiffs and the other Class members relied on Honda's material representations;
- c. Plaintiffs and the Class Members could not reasonably have been expected to learn or discover that the electrical systems components in their vehicles have a dangerous safety defect until after they purchased or leased the Class Vehicles; and,
- d. Defendant knew that Plaintiffs and the Class Members could not reasonably have been expected to learn about or discover the Electrical Defect.
- 100. On information and belief, Honda still has not made full and adequate disclosures and continues to defraud consumers by concealing material information regarding the Electrical Defect and the performance and quality of Class Vehicles.
- 101. The facts concealed or not disclosed by Defendant to Plaintiffs and Class Members are material in that a reasonable person would have considered them to be important in deciding whether or not to purchase the Class Vehicles.
- 102. Plaintiffs and Class relied on Defendant to disclose material information it knew, such as the defective nature of the electrical systems components in the Class Vehicles, and not to induce them into a transaction they would not have entered had the Defendant disclosed this information.

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- 103. By failing to disclose the Electrical Defect, Defendant knowingly and intentionally concealed material facts and breached its duty not to do so.
- 104. The facts concealed or not disclosed by Defendant to Plaintiffs and the other Class Members are material because a reasonable consumer would have considered them to be important in deciding whether or not to purchase the Class Vehicles, or to pay less for them.
- 105. Had Plaintiffs and other Class Members known that the Class Vehicles suffer from the Electrical Defect, they would not have purchased the Class Vehicles or would have paid less for them.
- 106. Plaintiffs and the other Class Members are reasonable consumers who do not expect that their vehicles will suffer from a Electrical Defect. That is the reasonable and objective consumer expectation for vehicles.
- 107. As a result of Defendant's misconduct, Plaintiffs and the other Class Members have been harmed and have suffered actual and economic damages in that the Class Vehicles are defective and require repairs or replacement parts and are worth less money because of the Defect.
- 108. Accordingly, Honda is liable to Plaintiffs and Class Members for damages in an amount to be proven at trial.
- 109. Honda's actions and omissions were done maliciously, oppressively, deliberately, with intent to defraud, and in reckless disregard of Plaintiffs' and the

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Class's rights and well-being, to enrich Honda. Honda's conduct warrants an assessment of punitive damages in an amount sufficient to deter such conduct in the future, which amount is to be determined according to proof.

- 110. Furthermore, as the intended and expected result of its fraud and conscious wrongdoing, Honda has profited and benefited from Plaintiffs' and Class Members' purchase of Class Vehicles containing the Electrical Defect. Honda has voluntarily accepted and retained these profits and benefits with full knowledge and awareness that, as a result of Honda's misconduct alleged herein, Plaintiffs and Class Members were not receiving vehicles of the quality, nature, fitness, or value that had been represented by Honda, and that a reasonable consumer would expect.
- 111. Honda has been unjustly enriched by its fraudulent, deceptive, and otherwise unlawful conduct in connection with the sale and lease of Class Vehicles and by withholding benefits from Plaintiffs and Class Members at the expense of these parties. Equity and good conscience militate against permitting Honda to retain these profits and benefits, and Honda should be required to make restitution of its illgotten gains resulting from the conduct alleged herein.

SECOND CAUSE OF ACTION Unjust Enrichment

(Plaintiffs on behalf of the Ohio Class)

112. Plaintiffs incorporate by reference all allegations contained in this Complaint as though fully stated herein.

- 113. Honda has long known that about the Electrical Defect which it concealed and failed to disclose to Plaintiffs and Class Members.
- 114. As a result of its fraudulent acts and omissions related to the Electrical Defect, Honda, who profited from selling the Class Vehicles to its authorized dealers who in turn resold and leased the Vehicles to Plaintiffs and Class Members, obtained monies which rightfully belong to Plaintiffs and the Class Members to the detriment of Plaintiffs and Class Members.
- 115. Honda appreciated, accepted, and retained the non-gratuitous benefits conferred by Plaintiffs and the proposed Class Members who, without knowledge of the Electrical Defect, paid a higher price for their vehicles which actually had lower values. Honda also received monies for vehicles that Plaintiffs and the Class Members would not have otherwise purchased or leased.
- 116. It would be inequitable and unjust for Honda to retain these wrongfully obtained profits.
- 117. Honda's retention of these wrongfully obtained profits would violate the fundamental principles of justice, equity, and good conscience.
- 118. As a result of Defendant's unjust enrichment, Plaintiffs and Class Members have suffered damages.

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120. Additionally, Plaintiffs seek injunctive relief to compel Defendant to offer, under warranty, remediation solutions that Defendant identifies. Plaintiffs also seek injunctive relief compelling Defendant to provide Class members with adequate repairs or with replacement components that do not contain the defects alleged herein; and/or compelling Defendant to reform its warranty, in a manner deemed to be appropriate by the Court, to cover the injury alleged and to notify all Class Members that such warranty has been reformed. Money damages are not an adequate remedy for the above requested non-monetary injunctive relief.

THIRD CAUSE OF ACTION

Violation of the Ohio Consumer Sales Practices Act Ohio Rev. Code § 1345.01, et seq. (Plaintiffs Jennifer and Sean Fausto on behalf of the Ohio Class)

- 121. Plaintiffs incorporate by referenced all allegations contained in this Complaint as though fully stated herein.
- 122. The Fausto Plaintiffs and the other Ohio Class Members are "consumers" as defined by the Ohio Consumer Sales Practices Act, Ohio Rev. Code § 1345.01 ("OCSPA").
 - 123. Defendant is a "supplier" as defined by the OCSPA.

- 124. The Fausto Plaintiffs' and the other Ohio Class Members' purchases or leases of Class Vehicles were "consumer transactions" as defined by the OCSPA.
- 125. The allegations set forth herein constitute false, misleading, unlawful, or deceptive trade practice under the OCSPA. Ohio Rev. Code § 1345.01, et seq.
- 126. By failing to disclose and concealing the Electrical Defect from the Fausto Plaintiffs and the Ohio Class Members, Defendant violated the OCSPA, as it represented that the Class Vehicles had characteristics and benefits that they do not have, represented that the Class Vehicles were of a particular standard, quality, or grade when they were of another, and advertised the Class Vehicles with the intent not to sell them as advertised.
- 127. Defendant's unfair and deceptive acts or practices occurred repeatedly in Defendant's trade or business, were capable of deceiving a substantial portion of the purchasing public and imposed a serious safety risk on the public.
- 128. Defendant knew that the Class Vehicles suffered from the Electrical Defect, were defectively manufactured or made, would fail prematurely, and were not suitable for their intended use.
- 129. Defendant was under a duty to the Fausto Plaintiffs and the Ohio Class Members to disclose the defective nature of the Class Vehicles because:
 - a. Defendant was in a superior position to know the true state of facts about the Electrical Defect contained in the Class Vehicles;

- b. Defendant knew that the Class Vehicles suffered from an inherent defect, were defectively designed or manufactured, and were not suitable for their intended use;
- The Fausto Plaintiffs and the Ohio Class Members could not reasonably c. have been expected to learn or discover that their vehicles have the Electrical Defect until after they purchased the Class Vehicles; and,
- d. Defendant made partial disclosures about the quality of the Class Vehicles without revealing the defective nature of the Class Vehicles and the Electrical Defect.
- 130. The facts concealed or not disclosed by Defendant to the Fausto Plaintiffs and the Ohio Class Members are material in that a reasonable person would have considered them to be important in deciding whether or not to purchase the Class Vehicles.
- 131. The Fausto Plaintiffs and the Ohio Class Members relied on Defendant to disclose material information it knew, such as the Electrical Defect in the Class Vehicles, and not to induce them into a transaction they would not have entered had the Defendant disclosed this information.
- 132. By failing to disclose the Electrical Defect, Defendant knowingly and intentionally concealed material facts, and breached its duty not to do so.

- 133. The Fausto Plaintiffs and the Ohio Class Members are reasonable consumers who do not expect that their vehicles will suffer from the Electrical Defect, which is the reasonable and objective consumer expectation for vehicles.
- The Ohio Attorney General has made available for public inspection prior state court decisions which have held that the acts and omissions of Defendant in this Complaint, including, but not limited to, the failure to honor both implied warranties and express warranties, the making and distribution of false, deceptive, and/or misleading representations, and the concealment and/or non-disclosure of a dangerous defect, constitute deceptive sales practices in violation of the OCSPA. These cases include, but are not limited to, the following: Mason v. Mercedes Benz. USA, LLC (OPIF #10002382); State ex rel. Betty D. Montgomery v. Defendants Motor Co. (OPIF #10002123); State ex rel. Betty D. Montgomery v. Bridgestone/Firestone, Inc. (OPIF #10002025); Bellinger v. Hewlett-Packard Co., No. 20744, 2002 Ohio App. LEXIS 1573 (Ohio Ct. App. Apr. 10, 2002) (OPIF #10002077); Borror v. MarineMax of Ohio, No. OT-06-010, 2007 Oho App. LEXIS 525 (Ohio Ct. App. Feb. 9, 2007) (OPIF #10002388); State ex rel. Jim Petro v. Craftmatic Organization, Inc. (OPIF #10002347); Mark J. Craw Defendants, et al. v. Joseph Airport Toyota, Inc. (OPIF #10001586); State ex rel. William J. Brown v. Harold Lyons, et al. (OPIF #10000304); Brinkman v. Mazda Motor of America, Inc. (OPIF #10001427); Khouri v. Don Lewis (OPIF #100001995); Mosley v. Performance Mitsubishi aka

Automanage (OPIF #10001326); Walls v. Harry Williams dba Butch's Auto Sales (OPIF #10001524); Brown v. Spears (OPIF #10000403); State ex rel. Brown v. Bud Fletcher Used Cars, Inc. (OPIF #10000228) (Ohio Ct. C.P. Apr. 27, 1982); State ex rel. Celebrezze v. Metro Toyota, Inc. (OPIF #10001194); and Shellhorn v. Kohler Chrysler-Plymouth, Inc. (PIF Number 10001309).

- 135. As a result of its violations of the OCSPA detailed above, Defendant caused actual damage to The Fausto Plaintiffs and the Ohio Class Members and, if not stopped, will continue to harm The Fausto Plaintiffs and the Ohio Class Members.

 The Fausto Plaintiffs and the Ohio Class Members currently own or lease a Class Vehicles that has a defective infotainment system. Defects associated with the infotainment system have caused the value of Class Vehicles to decrease.
- 136. As a result of Defendant's misconduct, the Fausto Plaintiffs and the Ohio Class Members have been harmed and have suffered actual and economic damages in that the Class Vehicles are defective and require repairs or replacement, and are worth less money because of the Electrical Defect.
- 137. The Fausto Plaintiffs also seeks court costs and attorneys' fees as a result of Defendant's violation of the OCSPA as provided in Ohio Rev. Code § 1345.09.

FOURTH CAUSE OF ACTION

Breach of Express Warranty Pursuant to Ohio Rev. Code Ann. § 1302.26 (Plaintiffs Jennifer and Sean Fausto on behalf of the Ohio Class)

138. Plaintiffs incorporate by reference all of the above paragraphs of this Complaint as though fully stated herein.

- 139. In connection with the sale or lease of the Class Vehicles to Plaintiffs and Class Members, Defendant provided Plaintiffs and Class Members with its New Vehicle Limited Warranty where it promised to repair defective parts within 4 years or 50,000 miles in service, whichever comes first, and with extended warranty where it promised to repair Electrical Defect within 5 years or 60,000 miles from the original date of purchase, whichever comes first.
- 140. The Fausto Plaintiffs and the Ohio Class Members relied on Defendant's warranties when they agreed to purchase or lease the Class Vehicles, and Defendant's warranties were part of the basis of the bargain.
- 141. The Fausto Plaintiffs and the Ohio Class Members submitted their vehicles for warranty repairs as referenced herein. Defendant failed to comply with the terms of the express written warranty provided to each class member by failing to repair the Electrical Defect under the vehicle's warranty within a reasonable period of time as described herein.
- 142. The Fausto Plaintiffs and the Ohio Class Members have given Defendant reasonable opportunities to cure the Electrical Defect plaguing their respective

vehicles, but Defendant has failed to repair the vehicles' Electrical Defect within a reasonable period of time.

- 143. As a result of these nonconformities, the Fausto Plaintiffs and the Ohio Class Members cannot reasonably rely on the Class Vehicles for the ordinary purpose of safe, reliable, comfortable, and efficient transportation.
- 144. The Fausto Plaintiffs and the Ohio Class Members could not reasonably have discovered these nonconformities with the Class Vehicles prior to the Fausto Plaintiffs and the Ohio Class Members' acceptance of the Class Vehicles.
- 145. As a result of Defendant's breach of express warranties, the Fausto Plaintiffs and the Ohio Class Vehicle owners have been damaged.

FIFTH CAUSE OF ACTION

Breach of the Implied Warranty of Merchantability Pursuant to Ohio Rev. Code Ann. § 1302.27

(Plaintiffs Jennifer and Sean Fausto on behalf of the Ohio Class)

- 146. Plaintiffs incorporate by reference all allegations contained in this Complaint as though fully stated herein.
 - 147. Defendant is a merchant with respect to motor vehicles.
- 148. The Class Vehicles were subject to implied warranties of merchantability running from the Defendant to the Fausto Plaintiffs and the Ohio Class Members.
- 149. An implied warranty that the Class Vehicles were merchantable arose by operation of law as part of the sale or lease of the Class Vehicles.

150. Defendant breached the implied warranty of merchantability in that the Class Vehicles suffer from the defects referenced herein and thus were not in merchantable condition when the Fausto Plaintiffs and the OhioClass Members purchased or leased the Class Vehicles, or at any time thereafter, and the Class Vehicles are unfit for the ordinary purposes for which such vehicles are used. Specifically, the Class Vehicles were and are not fit for their ordinary purpose of providing reasonably reliable and safe transportation because the Class Vehicles suffer from the Electrical Defect that causes driver distraction and thus makes driving unreasonably dangerous.

151. As a result of Defendant's breach of the applicable implied warranties, owners and lessees of the Class Vehicles suffered an ascertainable loss of money, property, and/or value of their Class Vehicles. Defendant's actions, as complained of herein, breached the implied warranty that the Class Vehicles were of merchantable quality and fit for such use.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, on behalf of themselves and all others similarly situated, pray for judgment against Defendant as follows:

A. An order certifying the proposed Class, designating Plaintiffs as named representatives of the Class, and designating the undersigned as Class Counsel;

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B. An order approving revocation of acceptance of the Class Vehicles;

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- C. Money damages, in the form of a refund of the full contract price, including trade-in allowance, taxes, fees, insurance premiums, interest, and costs, and a refund of all payments made by Plaintiffs and class members on the subject contracts;
- D. Equitable relief including, but not limited to, replacement of the Class Vehicles with new vehicles, or repair of the defective Class Vehicles with an extension of the express warranties and service contracts which are or were applicable to the Class Vehicles, in the event that Plaintiffs and Class members are not found to be entitled to revocation;
- E. A declaration requiring Defendant to comply with the various provisions of the state and federal consumer protection statutes herein alleged and to make all the required disclosures;
- F. Incidental and consequential damages;
- G. Punitive damages;
- H. Reasonable attorneys' fees and costs;
- I. Pre-judgment and post-judgment interest, as provided by law;
- J. Plaintiffs demand that Defendant perform a recall, and repair all Class Vehicles; and
- K. Such other and further relief as this Court deems just and proper.

TRIAL BY JURY DEMANDED ON ALL COUNTS

DATED: August 27, 2024 TRINETTE G. KENT

By: <u>/s/ Trinette G. Kent</u>
Trinette G. Kent, Esq.
Lemberg Law, LLC
Attorneys for Plaintiffs