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SUPERIOR COURT
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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF VENTURA

13 MICHAEL D'AMORE, on behalf of)
14 himself and those others similarly situated,)

15 Plaintiffs,)

16 vs.)

17 VOLKSWAGEN GROUP OF)
18 AMERICA, INC., VOLKSWAGEN)
19 AKTIENGESELLSCHAFT, and DOES 1-)
20 10,)

21 Defendants.)

CASE NO. 56-2018-00510371-CU-BT-VTA

CLASS ACTION COMPLAINT

- 22 1. Violation of the Magnuson-Moss
- 23 Warranty Act (15 U.S.C. § 2301, *et seq.*)
- 24 2. Violation of Consumer Legal Remedies
- 25 Act (Cal. Civ. Code § 1750, *et seq.*,
- 26 seeking injunctive relief only)
- 27 3. Violation of California Unfair
- 28 Competition Law (Business and
- Professions Code § 17200, *et seq.*)
- 4. Violations of the California False
- Advertising Law (Bus. & Prof. Code §
- 17500, *et seq.*)
- 5. Common Law Fraud
- 6. Breach of Implied Warranty
- 7. Breach of Express Warranty

DEMAND FOR JURY TRIAL

2-ED

1 Plaintiff Michael D'Amore ("Plaintiff"), by and through his attorneys, bring this action on
2 behalf of himself and all others similarly situated against Volkswagen AG and Volkswagen
3 Group of America, Inc. ("Volkswagen"). Plaintiff alleges the following upon information and
4 belief, except as to those allegations that pertain to Plaintiff.

5 **I. NATURE OF THE ACTION**

6 1. Volkswagen has represented itself as one of the safest automobile brands
7 manufacturing and selling vehicles in America. "It brakes when you don't," was a pledge made in
8 commercials to American consumers when Volkswagen tried to sell its 2016 models.

9 2. Volkswagen represented that its 2016 and 2017 models contained two technology
10 systems: Forward Collision Warning and Autonomous Emergency Braking (the "Systems").
11 Attached as Exhibits 1 through 8 are true and correct copies of the relevant pages from
12 Volkswagen Owner's Manuals explaining the operation of the system in some of the Class
13 Vehicles.¹ These owner's manuals explain the operation of the Autonomous Emergency Braking
14 system and the relevant speeds at which the system can operate. Additionally, Volkswagen made
15 representations in press releases, including in 2016 about the 2017 Passat. Attached as Exhibit 9 is
16 a true and correct copy of a 2016 Press Release from Defendants discussing the features of the
17 2017 Passat, including the Autonomous Emergency Braking system.

18 3. Despite Volkswagen's representations, at no point in 2016 or 2017 did these
19 systems properly work at speeds over 18 miles per hour. Attached as Exhibit 10 is a statement by
20 the Insurance Institute for Highway Safety ("IIHS") of how points are allocated for safety
21 systems, including, in the marked section, the safety system at issue herein. Attached as Exhibit
22 11 are the results from the IIHS's analysis of these systems in the Class Vehicles. Therein, the
23 Class Vehicles do not earn points for the safety systems represented and warranted by
24 Volkswagen.
25
26
27
28

¹ "Class Vehicles" is defined in paragraph 11 herein.

1 4. Volkswagen's intentional misrepresentation of the safety Systems rendered the
2 vehicles less valuable than the price for which they were sold.

3 5. Not only did Volkswagen's misrepresentation of the Systems diminish the value of
4 its 2016 and 2017 vehicles, Volkswagen endangered the owners and drivers who relied on the
5 safety technology promised, warranted and sold in its 2016 and 2017 vehicles.

6 6. Plaintiff, on behalf of himself and on behalf of a class of California residents who
7 purchased or leased Class Vehicles ("Class Members"), brings this action challenging
8 Volkswagen's deceptive representations and omissions regarding the safety of its nearly 100,000
9 2016 and 2017 vehicles sold in California and marketed as part of Volkswagen's broad-based
10 campaign to capitalize on safety concerns of consumers, including consumers with children.

11 7. Volkswagen utilized high-impact television commercials, the Internet, and print
12 advertisements that misleadingly touted safety.

13 8. Volkswagen's scheme may have succeeded except for testing conducted by the
14 IIHS (as evidenced in Exhibits 10 and 11).

15 9. Specifically, Volkswagen knowingly and intentionally misrepresented safety
16 features available in its 2016 and 2017 models.

17 10. Volkswagen's deliberate scheme impacted at least the vehicles listed in the chart
18 below in paragraph 11 ("Class Vehicles") and endangered not only the owners/operators of the
19 vehicles, but also the general driving public whose lives were at risk while driving on the
20 highways and streets alongside what drivers of Class Vehicles believe are vehicles equipped with
21 particular safety features. Further investigation may uncover additional vehicle models and model
22 years affected by Volkswagen's illegal ploy.

23 ///

24 ///

25 ///

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27 ///

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1 11. The Class Vehicles are defined as:

2 Model Year	Vehicle Model
3 2016	Golf, Golf GTI (“GTI”), Golf R, e-Golf, Golf SportWagen
4 2016	CC
5 2016	Jetta
6 2016	Passat
7 2017	Golf, Golf GTI (“GTI”), Golf R, e-Golf, Golf Alltrack, Golf SportWagen
8 2017	CC
9 2017	Jetta
10 2017	Passat

11 12. Because of Volkswagen’s illegal conduct, Volkswagen deceitfully sold every
12 proposed Class Vehicle to consumers based on knowingly false representations concerning the
13 actual safety features available and standard on the Class Vehicles. Volkswagen’s widespread
14 advertising based on the existence of these safety features in the Class Vehicles was also false and
15 misleading.

16 13. Volkswagen’s misrepresentations and omissions regarding the Class Vehicles’
17 safety in advertising, public statements, marketing materials, and owner’s manuals were material
18 factors in inducing Plaintiff and Class Members to purchase the Class Vehicles. As a result of
19 Volkswagen’s scam, over one million Class Vehicles were purchased worldwide based on
20 misleading and downright false claims of the Class Vehicles’ attributes. Had Plaintiff and Class
21 Members known that the Class Vehicles lacked the safety features advertised and promised, and
22 instead that such representations were part of a calculated scheme by Volkswagen to deceive
23 consumers, Plaintiff and the Class Members would not have purchased or leased their respective
24 Class Vehicles, or Plaintiff and Class Members would have paid significantly less for the vehicles
25 than they did.

26 14. This lawsuit seeks to remedy Volkswagen’s premeditated scheme to defraud and
27 ultimately endanger the public.
28

1 **II. THE PARTIES**

2 15. **Plaintiff Michael D'Amore** is a retired executive living in Ventura County,
3 California. Since childhood, Mr. D'Amore has had visual depth perception problems, and as a
4 result is a cautious, and safety-conscious consumer.

5 16. On November 11, 2016, Mr. D'Amore returned his 2014 Diesel Passat. At the
6 time he returned the 2014 Passat, Mr. D'Amore intended to purchase a 2017 Ford Fusion. Simply,
7 he was willing to wait for delivery of the new Fusions. However, he was told by employees at the
8 Neftin Volkswagen Dealership in Thousand Oaks, California, ("Neftin Volkswagen") that the
9 2017 Passat had the same safety features as the 2017 Fusion and that they could locate a 2017
10 Passat for him. Specifically, that like the 2016 before it, the 2017 Passat had autonomous braking
11 at higher speeds. This feature was material to Mr. D'Amore's purchase of the 2017 Passat.

12 17. Thereafter, the Neftin Volkswagen salesman showed Mr. D'Amore press releases
13 and other information from Volkswagen about the feature. Additionally, Mr. D'Amore viewed
14 commercials on YouTube highlighting the safety feature.

15 18. Mr. D'Amore purchased the 2017 Passat specifically because it contained safety
16 features that provided for autonomous braking at speeds over 25 miles per hour.

17 19. Based on the representations mentioned above, Mr. D'Amore purchased a brand
18 new 2017 Passat from Neftin Volkswagen in November of 2016.

19 20. Upon purchasing his 2017 Passat, Mr. D'Amore was given and read the owner's
20 manual for his new vehicle which contained a representation that the 2017 Passat has high-speed
21 autonomous braking system as a standard feature.

22 21. **Defendant Volkswagen Aktiengesellschaft.** Established in 1937, Defendant
23 Volkswagen Aktiengesellschaft ("Volkswagen AG") is a German car corporation organized and
24 existing under the laws of Germany, with its principle place of business in Wolfsburg, Germany.
25 Volkswagen AG is the parent company of Volkswagen Group of America, Inc., also a named
26 Defendant in this Complaint. Both Defendants (Volkswagen AG and Volkswagen Group of
27 America, Inc.) are collectively referred to in this complaint as "Volkswagen."
28

1 22. **Volkswagen Group of America, Inc.** Founded in 1955, Defendant Volkswagen
2 Group of America, Inc. (“VW of America”) is a wholly-owned subsidiary of Volkswagen AG, a
3 corporation organized and in existence under the laws of the State of New Jersey and registered
4 with the California Secretary of State to conduct business in California. Volkswagen is one of the
5 world’s largest producers of passenger cars and Europe’s largest automaker. VW of America sells
6 its vehicles through over 600 independent dealers in the United States. VW of America’s
7 operations in the United States include research and development; parts and vehicle processing;
8 parts distribution centers; sales; marketing; services offices; financial service centers; and a state-
9 of-the-art manufacturing facility in Chattanooga, Tennessee (the Volkswagen Chattanooga
10 Assembly Plant, which opened in 2011 and currently has over 3,200 Volkswagen employees, and
11 over 9,500 indirect supplier employees).

12 23. Volkswagen operates an Electronics Research Laboratory in Belmont, California.
13 The Volkswagen Electronic Research Laboratory (“ERL”) is located at 500 Clipper Drive,
14 Belmont, California, 94002. ERL is part of the global research and development network that
15 supports Volkswagen’s brands, including Audi, Bentley, Bugatti, Lamborghini, Porsche, and
16 Volkswagen. The ERL is a subsidiary of VW of America, with the parent company being VW of
17 America. The ERL was touted as one of Volkswagen’s largest research facilities outside of
18 Germany and takes advantage of its proximity to Silicon Valley to cultivate numerous
19 partnerships to enhance the knowledge of Volkswagen.
20

21 24. Volkswagen also operates a test center and emissions lab in Ventura County,
22 California. This facility, known as the “Test Center California in Oxnard” is a 64,000 square foot
23 development and emissions lab. Volkswagen employs approximately fifty engineers and
24 instructors who work on government compliance, powertrain, parts analysis, dealer service and
25 training, and emissions quality testing. Per Volkswagen’s statements, “Test Center California
26 represents the latest step in the Volkswagen Group’s \$4 billion growth strategy for the U.S.
27 market, which includes an investment of more than \$100 million in California. The Oxnard
28 facility will be the only Volkswagen Group research and development center of its kind in North

1 America with a primary focus on powertrain and systems development, governmental compliance
2 and field quality testing. Engineers at the TCC will continue to play a pivotal role in the
3 integration of engine development into the product development process, acting as the final stop
4 before vehicles are approved for production.”

5 25. During the Class Period, each Defendant acted as an agent, servant, employee,
6 and/or joint venturer of the Defendants and in doing the things alleged acted within the course of
7 such agency, employment, and/or in furtherance of the joint venture to accomplish the scheme.
8 Each of Defendants’ acts alleged herein was done with the permission and consent of each of the
9 other Defendants. While each of the Defendants are separate legal entities, Defendants work
10 together under a common identity as portrayed to the public and there is sufficient unity of
11 interest and control between each Defendant such that the acts of one are for the benefit of and
12 can be imputed to the other.
13

14 26. During the Class Period, Volkswagen was engaged in the business of designing,
15 manufacturing, constructing, assembling, marketing, advertising, promoting, distributing, and/or
16 selling automobiles and other motor vehicles and motor vehicle components throughout the
17 United States.

18 27. **DEFENDANTS DOES 1-10** Plaintiff is unaware of the true names of Defendants
19 DOES 1 through 10. Plaintiff sues said Defendants by said fictitious name and will amend this
20 complaint when the true names and capacities are ascertained or when such facts pertaining to
21 liability are ascertained, or as permitted by law or by the Court. Plaintiff is informed and believes
22 that each of the fictitiously named Defendants is in some manner responsible for the events and
23 allegations set forth in this complaint.

24 28. **CO-CONSPIRATORS** Plaintiff is informed and believes, and based thereon
25 alleges, that at all relevant times, each Defendant was an employer, was the principal, agent,
26 partner, joint venture, officer, director, controlling shareholder, subsidiary affiliate, parent
27 corporation, successor in interest and/or predecessor in interest of some or all of the other
28 Defendants, and was engaged with some or all of the other Defendants in a joint enterprise for

1 profit and bore such other relationships to some or all of the other Defendants so as to be liable
2 for their conduct with respect to the matters alleged in this complaint. Plaintiff is further informed
3 and believes and thereon alleges that each Defendant acted pursuant to and within the scope of the
4 relationships alleged above, and that at all relevant times, each Defendant knew or should have
5 known about, authorized, ratified, adopted, approved, controlled, aided and abetted the conduct of
6 all other Defendants. As used in this complaint "Defendant" means "Defendants and each of
7 them," and refers to the Defendants named in this particular action.

8 29. At all times mentioned herein, each Defendant was the co-conspirator, agent,
9 servant, employee, and/or joint venture of each of the other Defendants and was acting within the
10 course and scope of said conspiracy, agency, employment, and/or joint venture and with the
11 permission and consent and knowledge of each of the other Defendants.

12 30. Plaintiff makes the allegations in this complaint without any admission that, as to
13 any particular allegation, Plaintiff bears the burden of pleading, proving, or persuading, and
14 Plaintiff reserves all of Plaintiff's rights to plead in the alternative.

15
16 **III. JURISDICTION AND VENUE**

17 31. This Court has personal jurisdiction over Plaintiff because Plaintiff resides in the
18 County of Ventura, California, and submits to the Court's jurisdiction. This Court has personal
19 jurisdiction over Volkswagen because Volkswagen has conducted and continues to conduct
20 substantial business in California, and has sufficient minimum contacts with California in that: (1)
21 Volkswagen's Electronics Research Laboratory is located in Belmont, California; (2) its Test
22 Center California is located in Oxnard, California; (3) its Design Center is located in Santa
23 Monica, California; (4) its Pacific Region Office is located in Westlake Village, California; and
24 (5) its Parts Distribution Center is located in Ontario, California.

25 32. This Court has jurisdiction over this action under Article 6 of the California
26 Constitution and California Code of Civil Procedure § 410.10.

1 33. This Court has jurisdiction over Plaintiff's and the Class Members' claims for
2 injunctive relief, and restitution and other ill-gotten benefits arising from Defendant's unlawful
3 and/or unfair business practices under California Business & Professions Code §§17200 *et seq.*

4 34. Venue is proper in this judicial district, pursuant to California Code of Civil
5 Procedure § 395.5 because the acts, conduct, omissions, and events alleged herein, occurred in
6 part as to a large portion of the Class Members in this County.

7 35. Venue is proper in this Court because Volkswagen sells a substantial amount of
8 automobiles in this County, has dealerships in this County, maintains and operates a Test Center
9 in this County, and many of Volkswagen's acts complained of herein occurred within this
10 County. Furthermore, a substantial part of the events alleged in this Complaint, giving rise to
11 Plaintiff's claims, including the false and misleading advertising alleged herein, occurred in,
12 emanated from and/or were directed from this County. Venue is also proper in this Court because
13 Volkswagen caused harm to Class Members residing in this County.

14
15 **IV. FACTUAL ALLEGATIONS**

16 36. Beginning with advertisements for model year 2016, Volkswagen promoted an
17 autonomous braking system that operated at speeds well over 25 miles per hour.

18 37. To further support their nefarious advertisements, Volkswagen had the temerity to
19 put into the owner's manuals for each of the Class Vehicles language that expressly warranted
20 and promised collision warnings and autonomous emergency braking. Specifically, the language
21 provided in pertinent part (also attached as Exhibits 1 through 8 hereto):

22 **Distance warning**

23 If the vehicle is traveling within a speed of about 44-130 mph (70-
24 210 km/h), the system warns the driver with a message in the
25 instrument cluster display (→fig. 144 [symbol]) if it detects that the
26 vehicle is driving too close to the vehicle ahead→ [symbol] in
Introduction on page 270. No acoustic warning will sound.

27 The warning period varies according to the traffic situation and
28 your driving style.

1 **Increase the distance between your vehicle and the vehicle**
2 **ahead.**

3 **Advance warning**

4 If the vehicle is traveling within a speed range of about 18-130 mph
5 (30-210 km/h), the system warns the driver with a warning chime
6 and a message in the instrument cluster display (→ fig. 145 [image
7 on page] if it detects a possible collision with a vehicle
8 → [symbol] in *Introduction* on page 270.

9 The warning period varies according to the traffic situation and
10 your driving style.

11 **Brake or take action to avoid the vehicle ahead!**

12 However, do not rely solely on Front Assist. Under certain
13 conditions, the reactions of Front Assist may be unexpected or
14 delayed from the driver's viewpoint. Always pay attention and take
15 over if necessary → [symbol].

16 **Immediate warning**

17 If you fail to respond to the advance warning, within a speed range
18 of about 18-130 mph (30- 210 km/h), Front Assist can initiate a
19 short active braking maneuver, should you not react accordingly to
20 an advance alert. In this case you will notice brief, jerky braking of
21 the vehicle to warn you of an impending collision.

22 The moment of this alert can vary, depending on the traffic situation
23 and the driving behavior.

24 **Autonomous Emergency Braking**

25 If you should also fail to react to the immediate warning, within a
26 speed range of about 3-130² mph (5-210 km/h), Front Assist can
27 initiate an automatic braking maneuver that will **abruptly-**
28 **decelerate the vehicle** with elevated braking force. The emergency
 braking maneuver occurs shortly before a potential collision to
 reduce vehicle speed and help minimize the effects of a collision.

...

Braking support

Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation, should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In

² This range varies based on the model type. The language herein is specifically taken from the 2017 Passat Owner's Manual.

1 order for Front Assist to apply this support, it must have detected an
2 impending collision with another vehicle ahead of yours and the
3 brake pedal has to be hit hard and suddenly. However, this support
only works as long as the brake pedal is depressed.

4 Front Assist considers the driver's response time to give warnings
5 in time. This response time reduces automatically when the system,
6 for example, detects movement of the accelerator or steering wheel.
The system thus prevents unnecessary brake interventions, for
7 example, when the driver passes another vehicle.

8 Front Assist cannot react when approaching standing objects ahead
9 of you, for example, when driving up to a line of stopped vehicles
in heavy traffic.

10 38. As seen, Volkswagen made representations and warranties about the collision
11 warning system, how it operates, and the features provided therein.

12 39. However, Volkswagen never made such features available for vehicles traveling in
13 excess of 25 miles per hour. Based on personal experience, while driving his 2017 Passat in
14 excess of 25 miles per hour, Plaintiff did not experience any warning (visual or auditory), nor did
15 his vehicle engage in any autonomous braking.

16 40. Moreover, Plaintiff is informed and believes, and based thereon alleges, that the
17 Class Vehicles never had such safety technology and that Volkswagen knew or had reason to
18 know that such technology was either not available or did not function on their vehicles.

19 41. Volkswagen's imputed knowledge of this defect, is based, in part, on the results of
20 published unbiased testing conducted by the Insurance Institute for Highway Safety ("IIHS").

21 42. Based on IIHS testing, not one of the tested Class Vehicles had any high speed
22 autobrake technology that would reduce speed in a meaningful way, when the vehicle was
23 traveling over 25 miles per hour.

24 43. As reported by the IIHS, the 2016 and 2017 Passat speed was reduced by 0 miles
25 per hour when the Passat was traveling at 25 miles per hour.

26 44. As reported by the IIHS, the 2016 and 2017 Golf speed was reduced by 1 mile per
27 hour, when the Golf was traveling at 25 miles per hour.
28

1 45. As reported by the IIHS, the 2016 and 2017 Golf Sportwagen speed was reduced
2 by 1 mile per hour, when the Golf Sportwagen was traveling at 25 miles per hour.

3 46. As reported by the IIHS, the 2017 Golf Alltrack speed was reduced by 1 mile per
4 hour, when the Golf Alltrack was traveling at 25 miles per hour.

5 47. As reported by the IIHS, the 2016 Jetta speed was reduced by 0 miles per hour,
6 when the Jetta was traveling at 25 miles per hour.

7 48. As reported by the IIHS, the 2017 Jetta speed was reduced by 0 miles per hour,
8 when the Jetta was traveling at 25 miles per hour.

9 49. Despite these test results, Volkswagen maintains that the vehicles have the high
10 speed autonomous braking function.

11 50. When totaled, Volkswagen sold over 600,000 vehicles in the United States that
12 Volkswagen warranted had autonomous braking, but actually did not have autonomous braking.
13

14 **V. PLAINTIFF AND THE CLASS WERE HARMED BY VOLKSWAGEN'S**
15 **ACTIONS**

16 51. As a result of Volkswagen's actions, Plaintiff and the Class have been harmed.
17 Class Members would never have purchased the Class Vehicles, and/or would have paid
18 substantially less for their vehicle had they known the safety systems did not properly operate.
19 The Class Vehicles have lost value because of Defendants' actions and are not worth as much in a
20 trade or sale as if the vehicle had been as warranted. There is this actual harm and also the harm to
21 the brand, all which decreases the value of the Class Vehicles.

22 52. Accordingly, the Plaintiff and the Class have sustained incidental and
23 consequential damages as herein alleged.

24 **VI. CLASS ACTION ALLEGATIONS**

25 53. Plaintiff brings this action as a class action under California law on behalf of
26 himself and all others similarly situated. Plaintiff seeks to represent a Class of individuals (the
27 "Class") defined as:
28

1 All current and former owners of Class Vehicles who reside in the
2 State of California and/or who purchased or leased Class Vehicles
3 in California. Expressly excluded from the Class are Defendants
4 and their subsidiaries, affiliates, officers, directors, and employees.

5 54. Certification of the Class is appropriate pursuant to the applicable rules of Court,
6 statutes, and the public policy of the State of California. The proposed class is composed of tens
7 of thousands of persons dispersed throughout California and joinder is impracticable. The precise
8 number and identity of Class Members are unknown to Plaintiff at this time but can be obtained
9 from Volkswagen's internal records.

10 55. There are questions of law and fact common to the members of the Class, which
11 predominate over questions affecting only individual Class Members, inter alia:

- 12 a. Whether Volkswagen misrepresented the safety features of the Class Vehicles;
- 13 b. Whether Volkswagen publicized and advertised the safety features of the Class
14 Vehicles with respect to autonomous braking;
- 15 c. Whether Volkswagen's publicity and advertising regarding the safety features of
16 the Class Vehicles with respect to autonomous braking was misleading;
- 17 d. Whether the Class was harmed by the misrepresentation of the safety features of
18 the Class Vehicles;
- 19 e. Whether the Class is entitled to restitution of the purchase price of the Class
20 Vehicles;
- 21 f. Whether Volkswagen has engaged in unlawful, unfair or fraudulent business
22 practices;
- 23 g. Whether Volkswagen's misrepresentations and omissions regarding the safety
24 features of the Class Vehicles has deceived or is likely to have deceived Plaintiff
25 and the Class;
- 26 h. Whether Volkswagen's conduct violated the Magnuson-Moss Warranty Act;
- 27 i. Whether Volkswagen's conduct violated the California Consumer Legal Remedies
28 Act;

- 1 j. Whether Volkswagen's conduct violated California Business and Professions
2 Code § 17200, *et seq.*;
- 3 k. Whether Volkswagen's conduct violated California False Advertising Law
4 (Business and Professions Code § 17500, *et seq.*);
- 5 l. Whether Volkswagen breached express and/or implied warranties;
- 6 m. Whether Volkswagen's unlawful, unfair or deceptive practices have harmed
7 Plaintiff and members of the Class;
- 8 n. Whether Plaintiff and members of the Class are entitled to equitable or injunctive
9 relief;
- 10 o. Whether Plaintiff and members of the Class are entitled to damages,
11 including punitive damages; and
- 12 p. Whether Volkswagen has any common defenses applicable to the claims alleged
13 herein.
14

15 56. Plaintiff is a member of the Class and Plaintiff's claims are typical of the claims of
16 the Class.

17 57. Plaintiff is willing and prepared to serve the Court and the proposed Class in a
18 representative capacity. Plaintiff will fairly and adequately protect the interests of the Class and
19 has no interests adverse to or which conflict with the interests of the other members of the Class.

20 58. The self-interest of Plaintiff is co-extensive with and not antagonistic to those of
21 absent Class Members. Plaintiff will undertake to represent and protect the interests of absent
22 Class Members.

23 59. Plaintiff has engaged the services of counsel who are experienced in complex class
24 litigation, will adequately prosecute this action, and will assert and protect the rights of and
25 otherwise represent the Plaintiff and absent Class Members.

26 60. The prosecution of separate actions by individual members of the Class would
27 create a risk of inconsistency and varying adjudications, establishing incompatible standards of
28 conduct for Volkswagen.

1 61. Volkswagen has acted on grounds generally applicable to the Class, thereby
2 making relief with respect to the members of the Class as a whole appropriate.

3 62. A class action is superior to other available means for the fair and efficient
4 adjudication of this controversy. Prosecution of the complaint as a class action will provide
5 redress for individual claims too small to support the expense of complex litigation and reduce the
6 possibility of repetitious litigation.

7 63. Plaintiff anticipates no unusual management problems with the pursuit of this
8 Complaint as a class action.

9 **FIRST CLAIM**

10 **Violation of the Magnuson-Moss Warranty Act
11 15 U.S.C. § 2301 et seq.**

12 **(On Behalf of Plaintiff and the Class Against All Defendants)**

13 64. Plaintiff incorporates by reference each of the paragraphs set forth above as though
14 fully set forth hereinafter.

15 65. Plaintiff and the Class bring this claim under the Magnuson-Moss Warranty Act,
16 15 U.S.C. § 2301 et seq. ("the Act").

17 66. The Class Vehicles are consumer products as defined in 15 U.S.C. § 2301(1).

18 67. Defendants are a supplier and warrantor as defined in 15 U.S.C. § 2301(4),(5).

19 68. Plaintiff and the Class received written warranties as defined in 15 U.S.C.
20 §2301(6)(A) and/or (B), which Defendants have breached.

21 69. Plaintiff and the Class are "consumers" as defined in 15 U.S.C. § 2301(3). They
22 are consumers because they bought a Class Vehicle. They are entitled under California law to
23 enforce both written and implied warranties.

24 70. Pursuant to 15 U.S.C. § 2310(e), Plaintiff and the Class are not required to provide
25 Defendants notice of this class action and an opportunity to cure until the time the Court
26 determines the representative capacity of Plaintiff.

27 71. Defendants are liable to Plaintiff and the Class pursuant to 15 U.S.C. § 2310(d)(l)
28 because they breached their written warranties.

- Representing in their written and other advertising methods facts as true that are false with respect to safety features.

79. Plaintiff and the Class members have suffered harm as a result of these violations.

80. Plaintiff has suffered as a result of Volkswagen's unlawful conduct because they purchased the Class Vehicles believing, based on Volkswagen's representations, that the Class Vehicles had certain safety features and characteristics that made them as safe or more safe than other vehicles on the road. In fact, the Class Vehicles never had these features, and when advertised, Volkswagen knew that despite the advertising these features neither properly worked, or were extant in the Class Vehicles. These misrepresentations also resulted in higher purchase prices for the Class Vehicles and the subsequent revelation will result in lower resale value.

81. Volkswagen concealed from Plaintiff accurate information concerning the safety features and safety technology of the Class Vehicles.

82. Volkswagen's misrepresentations and omissions described in the preceding paragraphs were intentional, or alternatively, made without the use of reasonable procedures adopted to avoid such errors.

83. Volkswagen, directly or indirectly, has engaged in substantially similar conduct with respect to Plaintiff and to each member of the Class.

84. Unless Volkswagen is enjoined from engaging in such wrongful actions and conduct in the future, members of the consuming public will be further damaged by Volkswagen's conduct.

85. Plaintiff and the Class are entitled to equitable relief on behalf of the members of the Class in the form of an order, pursuant to Civil Code section 1780, subdivision (a)(2), prohibiting Volkswagen from continuing to engage in the above-described violations of the CLRA. Plaintiff and the Class further seek reasonable attorneys' fees under Civil Code section 1780(e).

86. Plaintiff reserves his rights to amend this cause of action to seek monetary relief once the necessary time elapses for his consumer notice to be considered.

1 87. WHEREFORE, Plaintiff and the Class pray for relief as set forth below.

2 **THIRD CLAIM**

3 **Violation of California Business and Professions Code § 17200, *et seq.***
4 **Unlawful Business Acts and Practices**
5 **(On Behalf of Plaintiff and the Class Against All Defendants)**

6 88. Plaintiff incorporates by reference each of the paragraphs set forth above as though
7 fully set forth hereinafter.

8 89. Business & Professions Code section 17200, *et seq.* prohibits acts of “unfair
9 competition” which is defined by Business & Professions Code section 17200 as including “any
10 unlawful, unfair or fraudulent business act or practice”

11 90. Volkswagen has violated and continues to violate Business & Professions Code
12 section 17200’s prohibition against engaging in “unlawful” business acts or practices, by, *inter*
13 *alia*, the following:

- 14 • Violating the CLRA, Civil Code section 1750, *et seq.* (as alleged herein);
- 15 • Violating the Magnuson-Moss Act;
- 16 • Engaging in fraudulent behavior; and
- 17 • Violating Business & Professions Code section 17500, *et seq.* (as further
18 alleged herein).

19 91. Volkswagen also acted fraudulently and unfairly for purposes of section 17200.
20 Volkswagen’s misrepresentations and omissions regarding the Class Vehicles’ safety technology
21 and safety performance in its advertising, public statements and marketing were a material factor
22 in inducing Plaintiff to purchase his Class Vehicle.

23 92. Plaintiff suffered injury in fact and lost money and/or property as a result of
24 Volkswagen’s unlawful business acts and practices and Class members have suffered harm when
25 each was required to pay a purchase price for their Class Vehicles which they never would have
26 purchased if the true facts were known; or paid a price in excess of what a Class Member would
27 have paid if Volkswagen had accurately disclosed the Class Vehicles’ true characteristics, and in
28 the form of decreased resale value of the Class Vehicles.

1 93. As a result of Volkswagen's violations of Business & Professions Code section
2 17200, *et seq.*, Plaintiff and the Class are entitled to equitable relief in the form of full restitution
3 for the inflated sale price of the Vehicles.

4 94. Plaintiff and the Class also seek an order enjoining Volkswagen from continuing
5 their unlawful business practices and from such future conduct.

6 95. WHEREFORE, Plaintiff and the Class pray for relief as set forth below.

7
8 **FOURTH CLAIM**

9 **For Violations of the California False Advertising Law,
Bus. & Prof. Code § 17500, *et seq.***

10 **(On Behalf of Plaintiff and the Class Against All Defendants)**

11 96. Plaintiff incorporates by reference each of the paragraphs set forth above as though
12 fully set forth hereinafter.

13 97. Volkswagen violated California's False Advertising Law, Business & Professions
14 Code sections 17500, *et seq.* by using false and misleading messages regarding the safety
15 technology and equipment of the Class Vehicles in television, print, and Internet advertising.

16 98. These representations and/or omissions have deceived and are likely to deceive
17 Plaintiff, the Class, and consumers across the country in connection with their decision to
18 purchase Class Vehicles. Volkswagen's representations and/or omissions were material and were
19 a substantial and material factor in Plaintiff's decision to purchase the Class Vehicle. Had
20 Plaintiff known the actual facts, he would not have purchased the Class Vehicle and/or would not
21 have paid what he did had Volkswagen accurately disclosed the Class Vehicle's true
22 characteristics.

23 99. Volkswagen directly and indirectly has engaged in substantially similar conduct
24 with respect to each Plaintiff and to each Class Member.

25 100. Plaintiff suffered injury in fact and lost money and/or property as a result of
26 Volkswagen's false and misleading advertising and Class Members suffered harm when each was
27 required to pay a purchase price in excess of what a Class Member would have paid if
28

1 Volkswagen had accurately disclosed the Class Vehicles' true characteristics, and in the form of
2 decreased resale value of the Class Vehicles.

3 101. As a result of Volkswagen's violations, Plaintiff and the Class are entitled to
4 equitable relief in the form of full restitution of all monies paid for the sales price of the Class
5 Vehicles, diminished value of the Class Vehicles, and/or disgorgement of the profits derived from
6 Volkswagen's false and misleading advertising.

7 102. Plaintiff also seeks an order enjoining Volkswagen from such future conduct.

8 103. WHEREFORE, Plaintiff and the Class pray for relief as set forth below.
9

10 **FIFTH CLAIM**
11 **For Common Law Fraud**
12 **(On Behalf of Plaintiff and the Class Against All Defendants)**

13 104. Plaintiff incorporates by reference each of the paragraphs set forth above as though
14 fully set forth hereinafter.

15 105. Volkswagen misrepresented, omitted and concealed important facts from Plaintiff
16 as alleged in the Complaint, including the following:

- 17 • Representing to consumers purchasing the Class Vehicles that these vehicles
18 possessed safety features that included autonomous braking at high speeds.
- 19 • Representing in their written and other advertising methods facts as true that
20 are false with respect to safety features.

21 Plaintiff and the Class members have suffered harm as a result of these violations.

22 106. Volkswagen's misrepresentations and omissions regarding the Class Vehicles'
23 safety features in their advertising, manuals, public statements and marketing were a material
24 factor in inducing Plaintiff to purchase his Class Vehicle. Plaintiff suffered injury in fact and lost
25 money and/or property as a result of Volkswagen's unlawful business acts and practices and Class
26 Members have suffered harm when each was required to pay a purchase price for their Class
27 Vehicle in excess of what a Class member would have paid if Volkswagen had accurately
28

1 disclosed the Class Vehicles' true characteristics, and in the form of decreased resale value of the
2 Class Vehicles.

3 107. Volkswagen concealed from Plaintiff accurate information concerning the safety
4 features of the Class Vehicles.

5 108. Volkswagen either knew that the representations were false when they made them,
6 or they made the representations recklessly and without regard for their truth.

7 109. Volkswagen had a duty to disclose the true characteristics of the Class Vehicles
8 due to their superior knowledge as well as due to their affirmative misrepresentations regarding
9 the safety features of the Class Vehicles.

10 110. Volkswagen intended for Plaintiff to rely on Volkswagen's representations.
11 Volkswagen intended to induce Plaintiff and the Class to: (a) purchase Class Vehicles; and (b) to
12 purchase Class Vehicles at a higher purchase price than they would have absent Volkswagen's
13 misrepresentations and concealment.

14 111. Plaintiff reasonably relied upon Volkswagen's representations regarding the
15 characteristics of the Class Vehicles. Plaintiff's reasonable reliance upon Volkswagen's
16 representations was a substantial factor in causing Plaintiff's harm.

17 112. As a direct and proximate result of Volkswagen's fraud, Plaintiff and the Class
18 have sustained damages in an amount to be determined at trial.

19 113. The aforementioned acts of Defendants, and each of them, were done maliciously,
20 oppressively, and fraudulently, and Plaintiff and the Class are entitled to punitive and exemplary
21 damages in an amount be shown according to proof at trial.

22 114. WHEREFORE, Plaintiff and the Class pray for relief as set forth below.

23
24 **SIXTH CLAIM**

25 **Breach of Implied Warranty**

26 **(On Behalf of Plaintiff and the Class Against All Defendants)**

27 115. Plaintiff incorporates by reference each of the paragraphs set forth above as though
28 fully set forth hereinafter.

1 116. Volkswagen impliedly warranted to persons purchasing the Class Vehicles that
2 these vehicles were what they were represented to be.

3 117. These implied warranties induced the community in general and Plaintiff and other
4 Class Members in particular to purchase the Class Vehicles from Volkswagen. These implied
5 warranties were both directly and indirectly believed and relied upon by Plaintiff and Class
6 Members and induced them to choose Volkswagen's Class Vehicles for purchase. This reliance
7 was justified by Volkswagen's skill, expertise, and judgment in the design, manufacturing,
8 testing, labeling, distribution, or sale of such products.

9 118. At the time of the sale, Volkswagen had knowledge of the purpose for which its
10 Class Vehicles were purchased and impliedly warranted the same to be, in all respects, fit and
11 proper for this purpose.

12 119. Volkswagen breached its aforesaid warranties in that the Class Vehicles were not
13 fit for the purpose for which they were intended and used; rather, Volkswagen sold to Plaintiff a
14 product which was not fit for use as represented. The defect in the Class Vehicles existed prior to
15 the delivery of the products to Plaintiffs and the Class.

16 120. Plaintiff and the Class have suffered injury in fact and have suffered an economic
17 loss by, *inter alia*: (a) leasing and/or purchasing a product they never would have leased or
18 purchased; (b) leasing and/or purchasing an inferior product whose nature and characteristics
19 render it of a lesser value than represented, (c) incurring costs for diminished resale value of the
20 Class Vehicles purchased, (d) leasing and/or purchasing a product that poses a danger to the
21 health and safety of the public, (e) incurring increased costs to repair the Class Vehicles
22 purchased, and (f) incurring costs for loss of use. Accordingly, the Court must issue an injunction
23 restraining and enjoining Volkswagen from sending or transmitting false and misleading
24 advertising to individuals or entities concerning the purported safety and quality of the Class
25 Vehicles from Volkswagen.
26

27 121. WHEREFORE, Plaintiff and the Class pray for judgment as set forth below.
28

SEVENTH CLAIM

Breach of Express Warranty

(On Behalf of Plaintiffs and the Class Against All Defendants)

1
2
3 122. Plaintiff incorporates by reference each of the paragraphs set forth above as though
4 fully set forth hereinafter.

5 123. Volkswagen expressly warranted to persons purchasing the Class Vehicles that
6 they were what they were represented to be.

7 124. These express warranties induced the community, in general, and Plaintiff and
8 members of the Class, in particular, to use and purchase Volkswagen's products. These express
9 warranties were both directly and indirectly believed and relied upon by Plaintiff and the Class
10 and induced Plaintiff and the Class to choose the Class Vehicles for purchase.

11 125. Volkswagen breached its aforesaid warranties in that its products were not fit for
12 the use and purpose expressly warranted by Volkswagen.

13 126. Plaintiff and the Class have suffered injury in fact and have suffered an economic
14 loss by, inter alia: (a) leasing and/or purchasing a product they never would have leased or
15 purchased; (b) leasing and/or purchasing an inferior product whose nature and characteristics
16 render it of a lesser value than represented, (c) incurring costs for diminished resale value of the
17 products purchased, (d) leasing and/or purchasing a product that poses a danger to the health and
18 safety of not only the purchaser but also the public, (e) incurring increased costs to repair the
19 products purchased, and (f) incurring costs from loss of use. Accordingly, the Court must issue an
20 injunction restraining and enjoining Volkswagen from sending or transmitting false and
21 misleading advertising to individuals or entities concerning the purported safety and quality of
22 vehicles from Volkswagen.
23

24 127. WHEREFORE, Plaintiff and the Class pray for judgment as set forth below.

25 ///

26
27 ///

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, on behalf of himself and the Class, prays for relief as follows:

1. An Order certifying this lawsuit for class action treatment;
2. An Order appointing Plaintiff to represent the proposed Class and designating his counsel as Class Counsel;
3. An Order enjoining Volkswagen from future violations of the CLRA, 15 U.S.C. section 2301, *et seq.*, Business & Professions Code section 17200, *et seq.*, Business & Professions Code section 17500, *et seq.*, as alleged herein;
4. An Order awarding Plaintiff and the Class restitution and/or disgorgement;
5. An Order awarding Plaintiff and the Class compensatory damages;
6. An Order awarding Plaintiff and the Class punitive damages;
7. An Order awarding Plaintiff his attorneys' fees, expert witness fees and other costs, including pre and post-judgment interest thereon to the extent allowed by law; and
8. Such other relief as the Court deems proper.

Respectfully submitted,

MOSS BOLLINGER, LLP
NEIFERT KHORSHID, APLC

By: 
Ari E. Moss, Esq.

Attorneys for Plaintiff and Putative Class

Dated: April 10, 2018

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury for all claims and issues so triable.

Respectfully submitted,

MOSS BOLLINGER, LLP
NEIFERT KHORSHID, APLC

By: 
Ari E. Moss, Esq.

Attorneys for Plaintiff and Putative Class

Dated: April 10, 2018

Complaint
&
Demand for Jury Trial

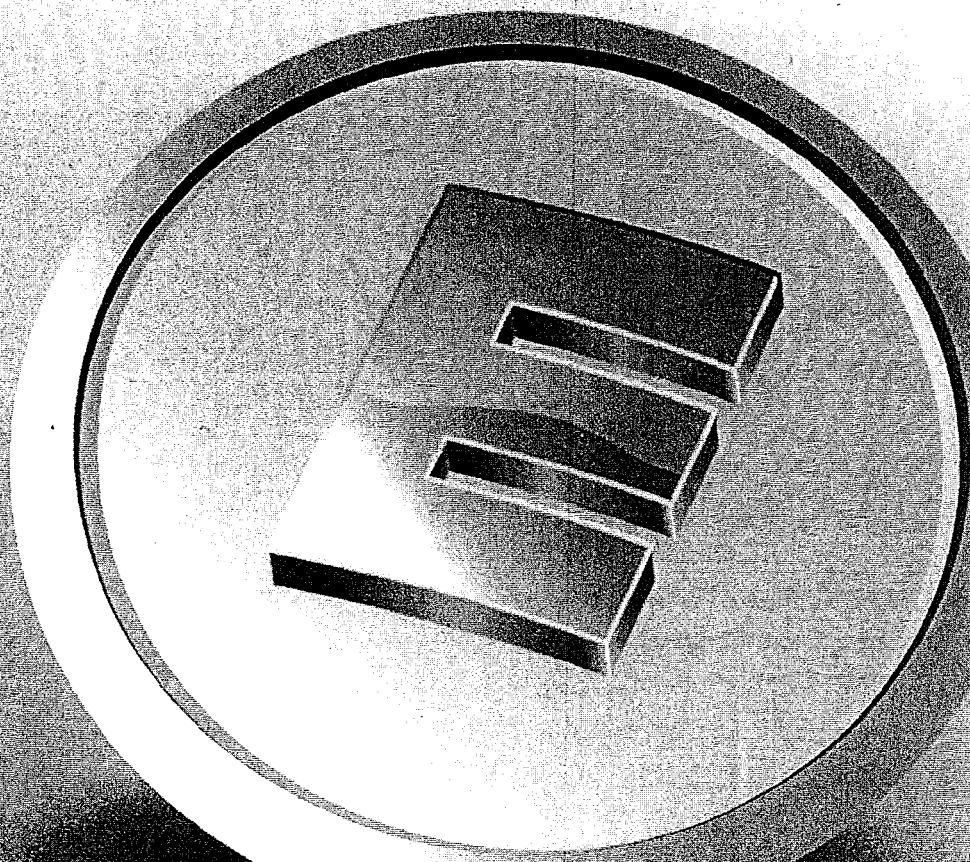
*D'Amore v. Volkswagen Group
of America, Inc.*

Exhibit 1





Owner's Manual e-Golf

U.S. Edition, Model Year 2016





Signs and symbols


 Indicates a reference to a section with important information and safety warnings  that should always be heeded.


 Arrow indicating that the section continues on the next page.


 Arrow marking the end of a section.

 The symbol indicates situations in which the vehicle must be stopped as quickly as possible.

 The symbol indicates registered trademarks. However, the absence of this symbol does not constitute a waiver of any rights associated with intellectual property.

 Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.

 Cross reference to a Notice about possible property damage, in the same section or on the stated page.

 Used on vehicle labels and indicates the availability of additional important information and warnings in this Owner's Manual.

DANGER

Texts with this symbol contain information regarding hazardous situations which will cause death or severe injuries if not avoided.

WARNING


Texts with this symbol contain information regarding hazardous situations which could cause death or severe injuries if not avoided.


CAUTION

Texts with this symbol contain information regarding hazardous situations which could cause minor or moderate injuries if not avoided.

NOTICE

Texts with this symbol contain information regarding situations which could cause vehicle damage if not avoided.

 Texts with this symbol contain information about the environment and how you can help to protect it.

 Texts with this symbol contain supplementary information.

Depending on vehicle equipment, the vehicle may be equipped with Forward Collision Warning (Front Assist), which includes Forward Collision Warning and Autonomous Emergency Braking systems.

The Forward Collision Warning system, when switched on, uses a radar sensor to help prevent rear-end collisions by providing a warning of a possible collision with a vehicle on the road ahead within physical and technical limits of the system.

When Front Assist is switched on, the Autonomous Emergency Braking system can automatically apply the brakes within the Front Assist speed range to help minimize the effects of a collision.

The Front Assist system is not a substitute for the driver's full concentration.

sary warnings in certain complex driving situations, for example, in traffic jams.

- The Front Assist system can issue unnecessary warnings when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Always be prepared to take full control of the vehicle at all times.

i Deactivate Front Assist if it does not work as described in this chapter, for example, if multiple unwanted warnings occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility. <

Driver warnings and Autonomous Emergency Braking

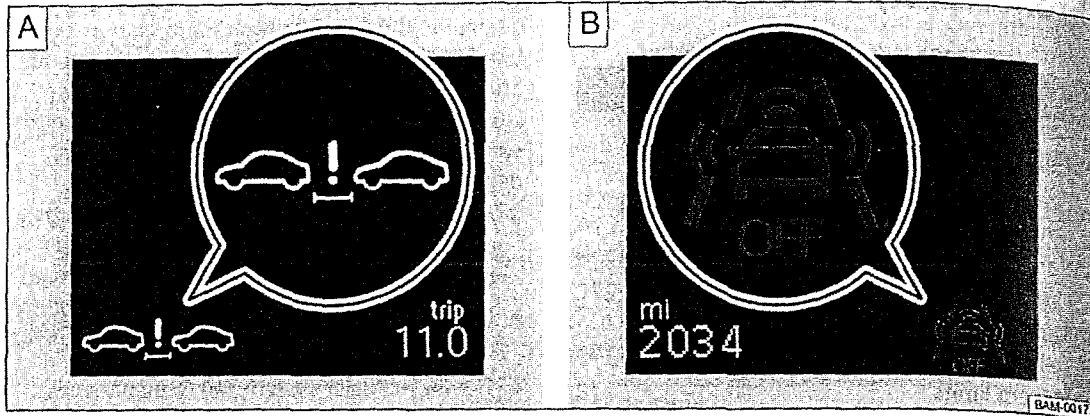


Fig. 143 Symbols in the instrument cluster display. [A]: Distance warning. [B]: System switched off (symbol displayed in color on an instrument cluster with color display).

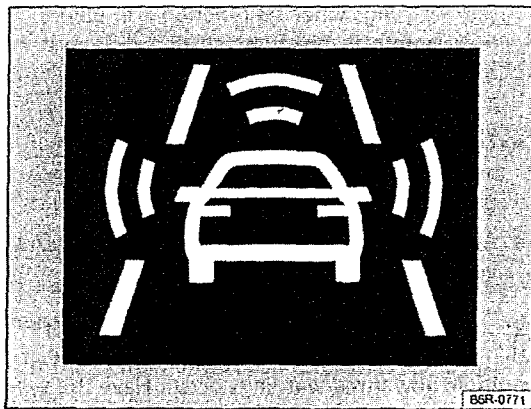


Fig. 144 In the instrument cluster display: Advance warning (symbol displayed in color on an instrument cluster with color display).

📖 Please read the introductory information and heed the Warnings and Notice ▲ on page 273.

Distance warning

If the vehicle is traveling within a speed range of about 45–155 mph (70–250 km/h), the system warns the driver with a message in the instrument cluster display (→ fig. 143 [A]) if it detects that the vehicle is driving too close to the vehicle ahead → ▲ in *Introduction* on page 273. No acoustic warning will sound.

The warning period varies according to the traffic situation and your driving style.

Increase the distance between your vehicle and the vehicle ahead.

Advance warning

If the vehicle is traveling within a speed range of about 18–155 mph (30–250 km/h), the system warns the driver with a warning chime and a message in the instrument cluster display (→ fig. 144¹⁾) if it detects a possible collision with a vehicle ahead → ▲ in *Introduction* on page 273.

The warning period varies according to the traffic situation and your driving style.

Brake or take action to avoid the vehicle ahead!

However, do not rely solely on Front Assist. Under certain conditions, the reactions of Front Assist may be unexpected or delayed from the driver's viewpoint. Always pay attention and take over if necessary → ▲.

Immediate warning

If you fail to respond to the advance warning, within a speed range of about 18–155 mph (30–250 km/h), Front Assist can initiate a short active braking maneuver, should you not react accordingly to an advance alert. In this case you will notice brief, jerky braking of the vehicle to warn you of an impending collision.

The moment of this alert can vary, depending on the traffic situation and the driving behavior. ▶

¹⁾ Displayed in color on an instrument cluster with color display.

without the distance, advance, or immediate warnings, reduce vehicle speed and help to minimize the effects of a collision → ▲.

The automatic braking maneuver occurs simultaneously with a warning in the instrument cluster display → fig. 144¹⁾.

Braking support

Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation within a speed range of about 3-155 mph (5-250 km/h), should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In order for Front Assist to apply this support, it must have detected an impending collision with another vehicle ahead of yours and the brake pedal has to be hit hard and suddenly. However, this support only works as long as the brake pedal is depressed.

Front Assist considers the driver's response time to give warnings in time. This response time reduces automatically when the system, for example, detects movement of the accelerator or steering wheel. The system thus prevents unnecessary brake interventions, for example, when the driver passes another vehicle.

Front Assist cannot react when approaching standing objects ahead of you, for example, when driving up to a line of stopped vehicles in heavy traffic.

¹⁾ Displayed in color on an instrument cluster with color display.

weather, and visibility conditions

- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings or braking maneuvers when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Never follow a vehicle so closely that you cannot stop your vehicle safely, under certain circumstances the automatic braking function cannot bring the vehicle to a stop in time.
- Never allow the closing speed between you and other vehicles to be so high that Front Assist may not be able to slow your vehicle safely. If closing speed is too high, you must apply the brakes yourself to reduce the risk of a rear-end crash.
- Always be prepared to take full control of the vehicle at all times.



Failure to heed warning lights and instrument cluster text messages can result in a collision and serious personal injury. ▶

- Never ignore warning lights or text WARNINGS.

NOTICE

If you notice that Front Assist doesn't work properly or the sensor is damaged, switch off Front Assist immediately.

- See an authorized Volkswagen dealer or authorized Volkswagen Service Facility for assistance and have the Front Assist system checked.

i If Front Assist initiates a braking maneuver, the braking system is under pressure. In this case the braking pedal will feel "harder" and the brake pedal travel will be shorter.

i Automatic braking maneuvers can be interrupted by depressing the clutch or gas pedal, or by moving the steering wheel.

i Deactivate the Front Assist system if it does not work as described in this chapter, for example, if multiple unwanted warnings or braking maneuvers occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

i When the Front Assist system is switched on, the display in the instrument cluster can be overwritten by displays related to other functions, for example, an incoming telephone call.

i The Autonomous Emergency Braking system can slow your vehicle down to a standstill, but not hold your vehicle permanently. When necessary, apply the vehicle brakes!

i Front Assist is automatically deactivated when ASR is switched off.

Radar sensor

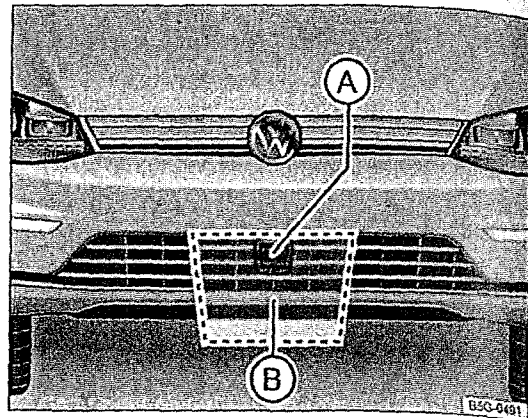


Fig. 145 In the front bumper: Radar sensor (A) and area around the radar sensor to be kept clean and free of obstructions (B).

ⓘ Please read the introductory information and heed the Warnings and Notice **▲** on page 273.

A radar sensor mounted in the front bumper monitors traffic → fig. 145 (A) and can detect vehicles traveling ahead up to a distance of about 130 yards (120 m).

The radar sensor function can be impaired by things such as mud, slush, or snow, or by conditions such as heavy rain or spray. In cases like these, Front Assist will not work. The driver message **Front Assist: no sensor view!** appears in the instrument cluster display. Clean the radar sensor as required → **ⓘ**.

The Front Assist system will automatically be available again as soon as the radar sensor is no longer impaired. The message in the instrument cluster display turns off.

The function of the Front Assist system can also be impaired when the radar signal radiation is reflected, for example, in multilevel parking structures, or by nearby metallic objects such as rails or metal plates in the road.

The area in front of and around the radar sensor (B) must not be covered by objects such as stickers, additional headlights, a license plate bracket, or other things, as these items can impair the function of the Front Assist system.

Any structural modifications to the vehicle, for example, lowering the vehicle or alterations to the front end trim, can impair the function of the Front Assist system. Structural modifications

Volkswagen works constantly to improve all of its products. Due to ongoing vehicle development, changes in design, equipment, and technology are possible at any time. The information about equipment, appearance, performance, dimensions, weights, power consumption, standards, and functions of the vehicles is the information that was available as of the editorial deadline. Some of the equipment may not be available until later or may be available only in certain markets. Contact your authorized Volkswagen dealer or authorized Volkswagen Service Facility for more information. No legal obligations or commitments may be derived from the information, illustrations, and descriptions in this Manual.

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This paper was made from chlorine-free, bleached pulp.

Owner's Manual:
e-Golf
Stand: 20.04.2016
Englisch USA: 05.2016
Teile-Nr.: 5GE012723BC



5GE012723BC

1.052016

Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*

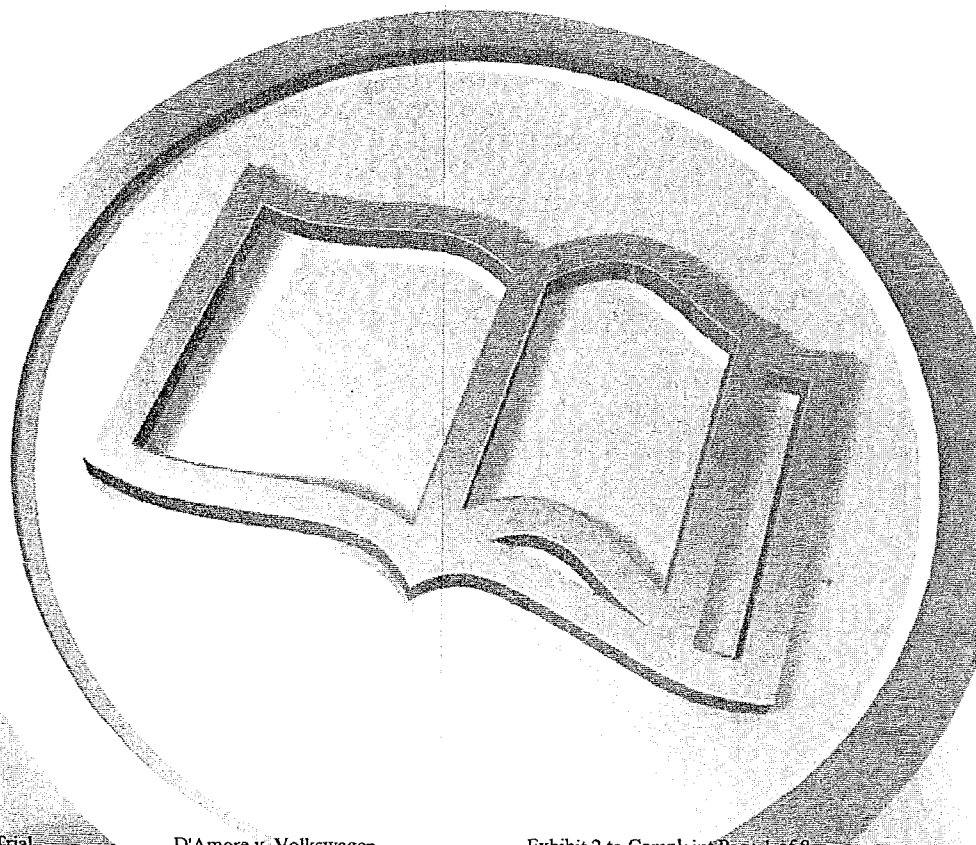
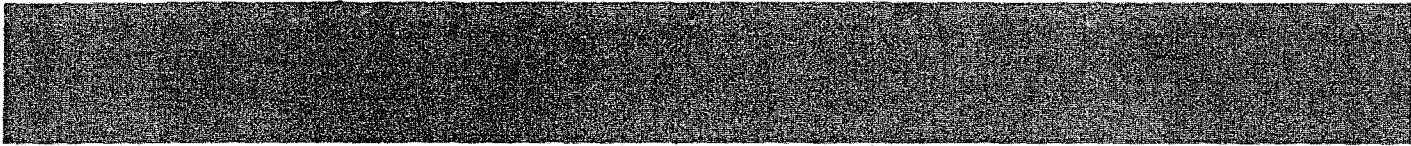
Exhibit 2











Owner's Manual


Golf GTI, Golf R

U.S. Edition, Model Year 2016




Signs and symbols


-  Indicates a reference to a section with important information and safety warnings that should always be heeded.
-  Arrow indicating that the section continues on the next page.
-  Arrow marking the end of a section.
-  The symbol indicates situations in which the vehicle must be stopped as quickly as possible.
-  The symbol indicates registered trademarks. However, the absence of this symbol does not constitute a waiver of any rights associated with intellectual property.
-  Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.
-  Cross reference to a Notice about possible property damage, in the same section or on the stated page.
-  Used on vehicle labels and indicates the availability of additional important information and warnings in this Owner's Manual.

 DANGER


Texts with this symbol contain information regarding hazardous situations which will cause death or severe injuries if not avoided.

 WARNING


Texts with this symbol contain information regarding hazardous situations which could cause death or severe injuries if not avoided.


 CAUTION

Texts with this symbol contain information regarding hazardous situations which could cause minor or moderate injuries if not avoided.

 NOTICE

Texts with this symbol contain information regarding situations which could cause vehicle damage if not avoided.

 Texts with this symbol contain information about the environment and how you can help to protect it.

 Texts with this symbol contain supplementary information.

Front Assist

Introduction

In this section you'll find information about:

Driver warnings and Autonomous Emergency Braking	
Braking	291
Radar sensor	293
Operating Front Assist	294
Temporarily switch off Front Assist in the following situations	295
System limits	295

Depending on vehicle equipment, the vehicle may be equipped with Front Assist, which includes Forward Collision Warning and Autonomous Emergency Braking systems.

The Forward Collision Warning system, when switched on, uses a radar sensor to help prevent rear-end collisions by providing a warning of a possible collision with a vehicle on the road ahead within physical and technical limits of the system.

When Front Assist is switched on, the Autonomous Emergency Braking system can automatically apply the brakes within the Front Assist speed range to help minimize the effects of a collision.

The Front Assist system is not a substitute for the driver's full concentration.

Additional information and warnings:

- Exterior views → page 6
- Volkswagen Information System → page 24
- Infotainment system → page 31
- Parts, accessories, repairs, and modifications → page 380

WARNING

The Front Assist system technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.

- Always adjust your speed and driving style to road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Always be prepared to take full control of the vehicle at all times.

i Deactivate Front Assist if it does not work as described in this chapter, for example, if multiple unwanted warnings occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

Driver warnings and Autonomous Emergency Braking

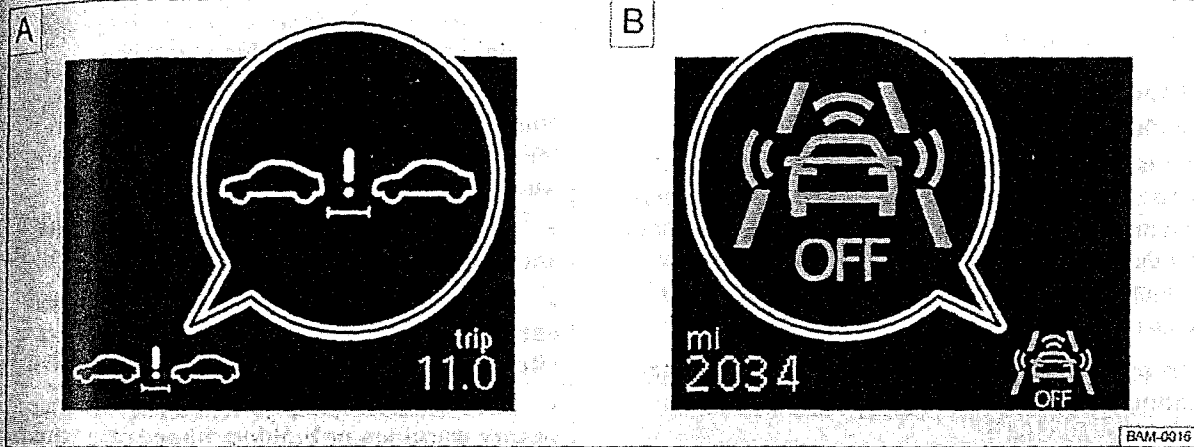


Fig. 159 Symbols in the instrument cluster display. [A]: Distance warning. [B]: System switched off (symbol displayed in color on an instrument cluster with color display).

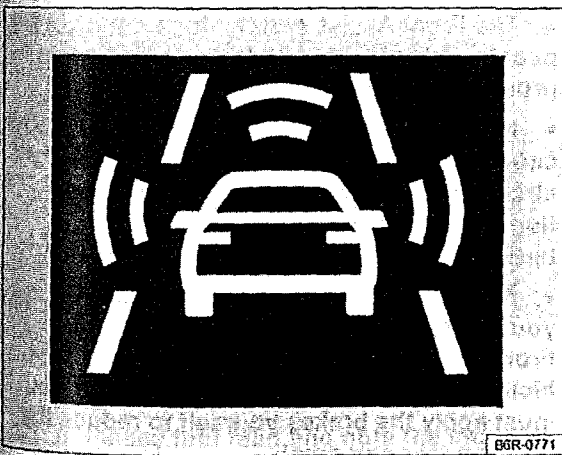





Fig. 160 In the instrument cluster display: Advance warning (symbol displayed in color on an instrument cluster with color display).

 Please first read and note the introductory information and heed the WARNINGS  on page 290.

Distance warning


If the vehicle is traveling within a speed range of about 44–100 mph (70–160 km/h), the system warns the driver with a message in the instrument cluster display (⇒ fig. 159 [A]) if it detects that the vehicle is driving too close to the vehicle ahead ⇒  in *Introduction* on page 290. No acoustic warning will sound.

The warning period varies according to the traffic situation and your driving style.

Increase the distance between your vehicle and the vehicle ahead.


¹⁾ Displayed in color on an instrument cluster with color display.

Advance warning

If the vehicle is traveling within a speed range of about 18–100 mph (30–160 km/h), the system warns the driver with a warning chime and a message in the instrument cluster display (⇒ fig. 160¹⁾) if it detects a possible collision with a vehicle ahead ⇒  in *Introduction* on page 290.

The warning period varies according to the traffic situation and your driving style.

Brake or take action to avoid the vehicle ahead!

However, do not rely solely on Front Assist. Under certain conditions, the reactions of Front Assist may be unexpected or delayed from the driver's viewpoint. Always pay attention and take over if necessary ⇒ .

Immediate warning

If you fail to respond to the advance warning, within a speed range of about 18–100 mph (30–160 km/h), Front Assist can initiate a short active braking maneuver, should you not react accordingly to an advance alert. In this case you will notice brief, jerky braking of the vehicle to warn you of an impending collision.


The moment of this alert can vary, depending on the traffic situation and the driving behavior.

Autonomous Emergency Braking

If you should also fail to react to the immediate warning, within a speed range of about 3–100 mph (5–160 km/h), Front Assist can initiate an automatic braking maneuver that will abruptly decelerate ►

the vehicle with elevated braking force. The emergency braking maneuver occurs shortly before a potential collision to reduce vehicle speed and help to minimize the effects of a collision.

Autonomous Emergency Braking below 18 mph (30 km/h)

In case of an impending collision, within a speed range of about 3–18 mph (5–30 km/h), Front Assist can initiate an automatic braking maneuver without the distance, advance, or immediate warnings to reduce vehicle speed and help to minimize the effects of a collision ⇒ .

The automatic braking maneuver occurs **simultaneously** with a warning in the instrument cluster display ⇒ fig. 160¹⁾.


Braking support

Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation, should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In order for Front Assist to apply this support, it must have detected an impending collision with another vehicle ahead of yours and the brake pedal has to be hit hard and suddenly. However, this support only works as long as the brake pedal is depressed.

Front Assist considers the driver's response time to give warnings in time. This response time reduces automatically when the system, for example, detects movement of the accelerator or steering wheel. The system thus prevents unnecessary brake interventions, for example, when the driver passes another vehicle.

Front Assist cannot react when approaching standing objects ahead of you, for example, when driving up to a line of stopped vehicles in heavy traffic.

System deactivated

If the system is switched off, a text message and symbol appear in the instrument cluster display ⇒ fig. 159  (magnified view)¹⁾.

⚠ WARNING

The Front Assist technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system is-

⚠ WARNING (continued)


sues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.


- Always adjust your speed, driving style, and the distance you keep between you and the vehicles ahead of you to the road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings or braking maneuvers when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Never follow a vehicle so closely that you cannot stop your vehicle safely, under certain circumstances the automatic braking function cannot bring the vehicle to a stop in time.
- Never allow the closing speed between you and other vehicles to be so high that Front Assist may not be able to slow your vehicle safely. If closing speed is too high, you must apply the brakes yourself to reduce the risk of a rear-end crash.
- Always be prepared to take full control of the vehicle at all times.

NOTICE

If you notice that the Front Assist doesn't work properly or the sensor is damaged, switch off Front Assist immediately.

• See an authorized Volkswagen dealer or authorized Volkswagen Service Facility for assistance and have the Front Assist checked.

 If Front Assist initiates a braking maneuver, the braking system is under pressure. In this case the braking pedal will feel "harder" and the brake pedal travel will be shorter.

 Automatic braking maneuvers can be interrupted by depressing the clutch or gas pedal or by moving the steering wheel.

¹⁾ Displayed in color on an instrument cluster with color display.

i Deactivate the Front Assist system if it does not work as described in this chapter, for example, if multiple unwanted warnings or braking maneuvers occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

i When the Front Assist system is switched on, the display in the instrument cluster can be overwritten by displays related to other functions, for example, an incoming telephone call.

i The Autonomous Emergency Braking system can slow your vehicle down to a standstill, but not hold your vehicle permanently. When necessary, apply the vehicle brakes! ◀

Radar sensor

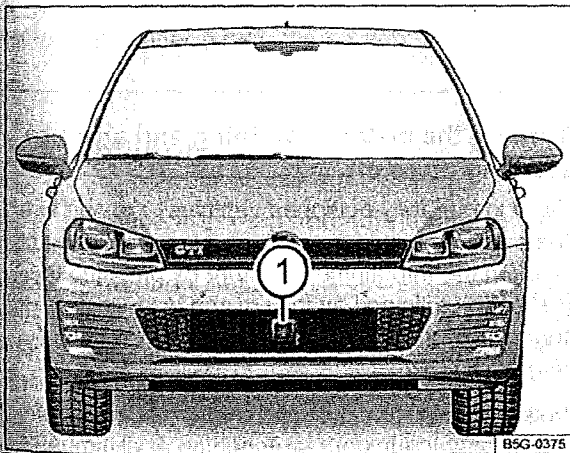


Fig. 161 In the front bumper: Radar sensor.

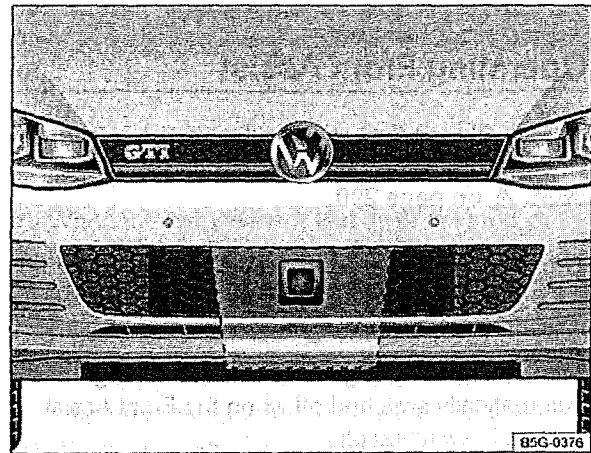


Fig. 162 Area around the radar sensor to be kept clean and free of obstructions.

Please first read and note the introductory information and heed the WARNINGS ⚠ on page 290.

A radar sensor mounted in the front bumper monitors traffic ⇒ fig. 161 ① and can detect vehicles traveling ahead up to a distance of about 130 yards (120 m).

The radar sensor function can be impaired by things such as mud, slush, or snow, or by conditions such as heavy rain or spray. In cases like these, Front Assist will not work. The driver message **Front Assist: no sensor view!** appears in the instrument cluster display. Clean the radar sensor as required ⇒ ①.

The Front Assist system will automatically be available again as soon as the radar sensor is no longer impaired. The message in the instrument cluster display turns off.

The function of the Front Assist system can also be impaired when the radar signal radiation is reflected, for example, in multilevel parking structures, or by nearby metallic objects such as rails or metal plates in the road.

The area in front of and around the radar sensor ⇒ fig. 162 must not be covered by objects such as stickers, additional headlights, a license plate bracket, or other things, as these items can impair the function of the Front Assist system.

Any structural modifications to the vehicle, for example, lowering the vehicle or alterations to the front end trim, can impair the function of the Front Assist system. Structural modifications should only be carried out by a qualified workshop ⇒ page 380, *Parts, accessories, repairs, and modifications*. Contact an authorized Volkswagen dealer or an authorized Volkswagen Service Facility for assistance.

Incorrectly performed repairs to the front end of the vehicle can change the position of the radar sensor and therefore impair the function of the Front Assist system. Repair work should only be carried out by a qualified workshop. Contact an authorized Volkswagen dealer or an authorized Volkswagen Service Facility for assistance. ▶

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Complaint & Demand for Jury Trial

D'Amore v. Volkswagen

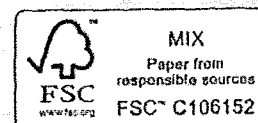


Exhibit 2 to Complaint Page 8 of 8

Complaint
&
Demand for Jury Trial

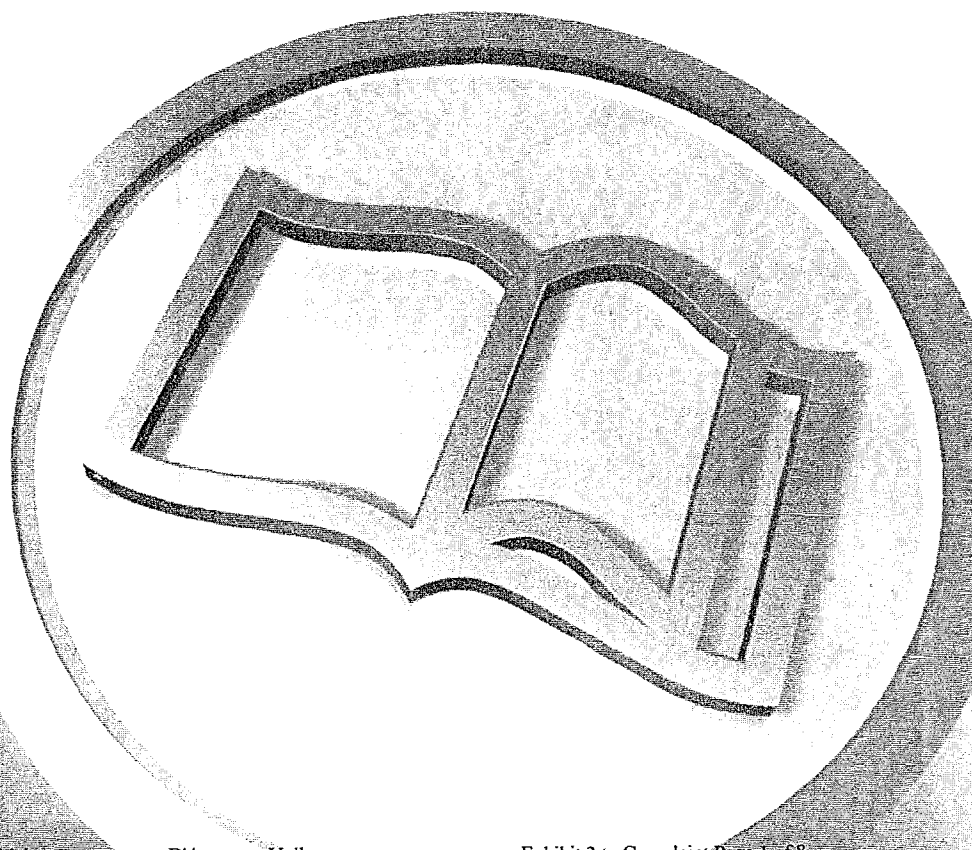
*D'Amore v. Volkswagen Group
of America, Inc.*

Exhibit 3






Owner's Manual Golf SportWagen, Golf Sportwagon


U.S. Edition, Model Year 2016




Signs and symbols


 Indicates a reference to a section with important information and safety warnings  that should always be heeded.


 Arrow indicating that the section continues on the next page.


 Arrow marking the end of a section.

 The symbol indicates situations in which the vehicle must be stopped as quickly as possible.

⊙ The symbol indicates registered trademarks. However, the absence of this symbol does not constitute a waiver of any rights associated with intellectual property.

→  Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.

→  Cross reference to a Notice about possible property damage, in the same section or on the stated page.

 Used on vehicle labels and indicates the availability of additional important information and warnings in this Owner's Manual.

DANGER

Texts with this symbol contain information regarding hazardous situations which will cause death or severe injuries if not avoided.

WARNING


Texts with this symbol contain information regarding hazardous situations which could cause death or severe injuries if not avoided.


CAUTION

Texts with this symbol contain information regarding hazardous situations which could cause minor or moderate injuries if not avoided.

NOTICE

Texts with this symbol contain information regarding situations which could cause vehicle damage if not avoided.

 Texts with this symbol contain information about the environment and how you can help to protect it.

 Texts with this symbol contain supplementary information.

Forward Collision Warning (Front Assist)

Introduction

In this section you'll find information about:

- Driver warnings and Autonomous Emergency Braking 285
- Radar sensor 287
- Operating Front Assist 288
- Temporarily switch off Front Assist in the following situations 288
- System limits 289

Depending on vehicle equipment, the vehicle may be equipped with Forward Collision Warning (Front Assist), which includes Forward Collision Warning and Autonomous Emergency Braking systems.

The Forward Collision Warning system, when switched on, uses a radar sensor to help prevent rear-end collisions by providing a warning of a possible collision with a vehicle on the road ahead within physical and technical limits of the system.

When Front Assist is switched on, the Autonomous Emergency Braking system can automatically apply the brakes within the Front Assist speed range to help minimize the effects of a collision.

The Front Assist system is not a substitute for the driver's full concentration.

More information:


- Exterior views → page 6
- Volkswagen Information System → page 25

- Infotainment system → page 30
- Parts, accessories, repairs, and modifications → page 379

WARNING

The Front Assist system technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.

- Always adjust your speed and driving style to road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Always be prepared to take full control of the vehicle at all times.

 Deactivate Front Assist if it does not work as described in this chapter, for example, if multiple unwanted warnings occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

Driver warnings and Autonomous Emergency Braking

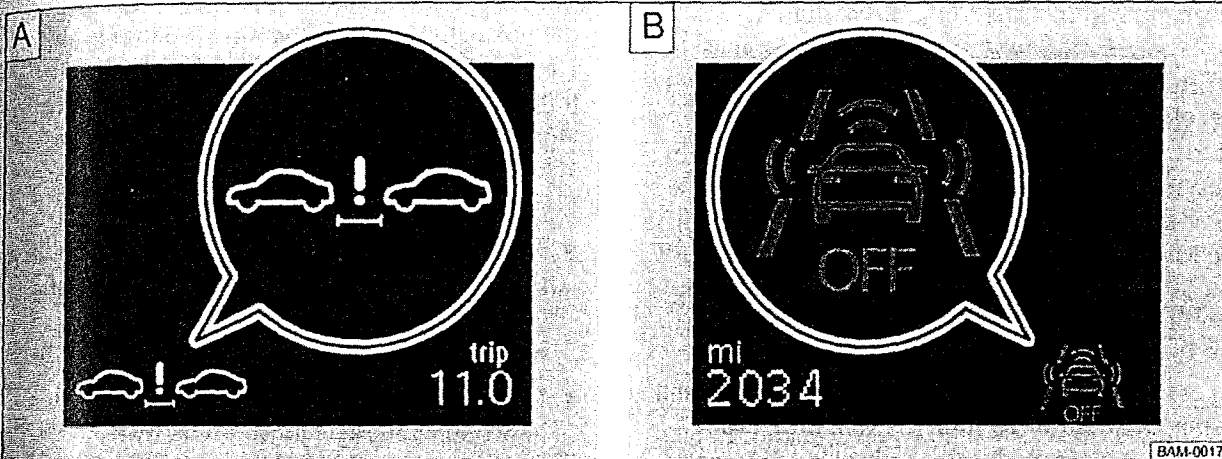


Fig. 155 Symbols in the instrument cluster display. [A]: Distance warning. [B]: System switched off (symbol displayed in color on an instrument cluster with color display).

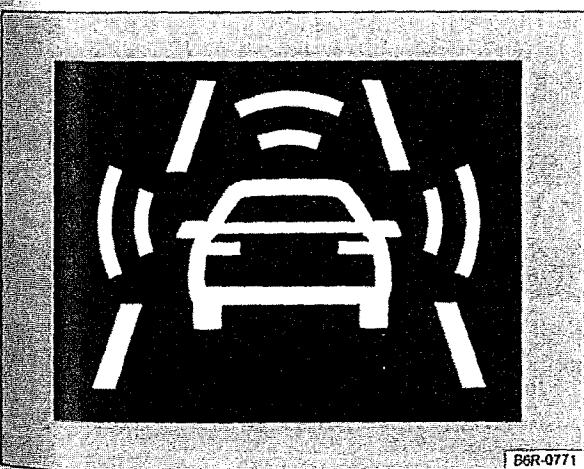


Fig. 156 In the instrument cluster display: Advance warning (symbol displayed in color on an instrument cluster with color display).

Please read the introductory information and heed the Warnings and Notice on page 284.

Distance warning

If the vehicle is traveling within a speed range of about 44–130 mph (70–210 km/h), the system warns the driver with a message in the instrument cluster display (→ fig. 155 [A]) if it detects that the vehicle is driving too close to the vehicle ahead → in *Introduction* on page 284. No acoustic warning will sound.

The warning period varies according to the traffic situation and your driving style.

Increase the distance between your vehicle and the vehicle ahead.

Advance warning

If the vehicle is traveling within a speed range of about 18–130 mph (30–210 km/h), the system warns the driver with a warning chime and a message in the instrument cluster display (→ fig. 156¹⁾) if it detects a possible collision with a vehicle ahead → in *Introduction* on page 284.

The warning period varies according to the traffic situation and your driving style.

Brake or take action to avoid the vehicle ahead!

However, do not rely solely on Front Assist. Under certain conditions, the reactions of Front Assist may be unexpected or delayed from the driver's viewpoint. Always pay attention and take over if necessary → .

Immediate warning

If you fail to respond to the advance warning, within a speed range of about 18–130 mph (30–210 km/h), Front Assist can initiate a short active braking maneuver, should you not react accordingly to an advance alert. In this case you will notice brief, jerky braking of the vehicle to warn you of an impending collision.


The moment of this alert can vary, depending on the traffic situation and the driving behavior. ▶

¹⁾ Displayed in color on an instrument cluster with color display.

Autonomous Emergency Braking

If you should also fail to react to the immediate warning, within a speed range of about 3–130 mph (5–210 km/h), Front Assist can initiate an automatic braking maneuver that will abruptly decelerate the vehicle with elevated braking force. The emergency braking maneuver occurs shortly before a potential collision to reduce vehicle speed and help to minimize the effects of a collision.

Autonomous Emergency Braking below 18 mph (30 km/h)

In case of an impending collision, within a speed range of about 3–18 mph (5–30 km/h), Front Assist can initiate an automatic braking maneuver without the distance, advance, or immediate warnings to reduce vehicle speed and help to minimize the effects of a collision → .

The automatic braking maneuver occurs simultaneously with a warning in the instrument cluster display → fig. 156¹⁾.


Braking support

Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation, should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In order for Front Assist to apply this support, it must have detected an impending collision with another vehicle ahead of yours and the brake pedal has to be hit hard and suddenly. However, this support only works as long as the brake pedal is depressed.

Front Assist considers the driver's response time to give warnings in time. This response time reduces automatically when the system, for example, detects movement of the accelerator or steering wheel. The system thus prevents unnecessary brake interventions, for example, when the driver passes another vehicle.

Front Assist cannot react when approaching standing objects ahead of you, for example, when driving up to a line of stopped vehicles in heavy traffic.

System deactivated

If the system is switched off, a text message and symbol appear in the instrument cluster display → fig. 155  (magnified view)¹⁾.

¹⁾ Displayed in color on an instrument cluster with color display.

WARNING

The Front Assist technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.

- Always adjust your speed, driving style, and the distance you keep between you and the vehicles ahead of you to the road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings or braking maneuvers when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Never follow a vehicle so closely that you cannot stop your vehicle safely, under certain circumstances the automatic braking function cannot bring the vehicle to a stop in time.
- Never allow the closing speed between you and other vehicles to be so high that Front Assist may not be able to slow your vehicle safely. If closing speed is too high, you must apply the brakes yourself to reduce the risk of a rear-end crash.
- Always be prepared to take full control of the vehicle at all times.

NOTICE

If you notice that Front Assist doesn't work properly or the sensor is damaged, switch off Front Assist immediately.

- See an authorized Volkswagen dealer or authorized Volkswagen Service Facility for assistance and have the Front Assist system checked. →

i If Front Assist initiates a braking maneuver, the braking system is under pressure. In this case the braking pedal will feel "harder" and the brake pedal travel will be shorter.

i Automatic braking maneuvers can be interrupted by depressing the clutch or gas pedal, or by moving the steering wheel.

i Deactivate the Front Assist system if it does not work as described in this chapter, for example, if multiple unwanted warnings or braking maneuvers occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

i When the Front Assist system is switched on, the display in the instrument cluster can be overwritten by displays related to other functions, for example, an incoming telephone call.

i The Autonomous Emergency Braking system can slow your vehicle down to a standstill, but not hold your vehicle permanently. When necessary, apply the vehicle brakes!

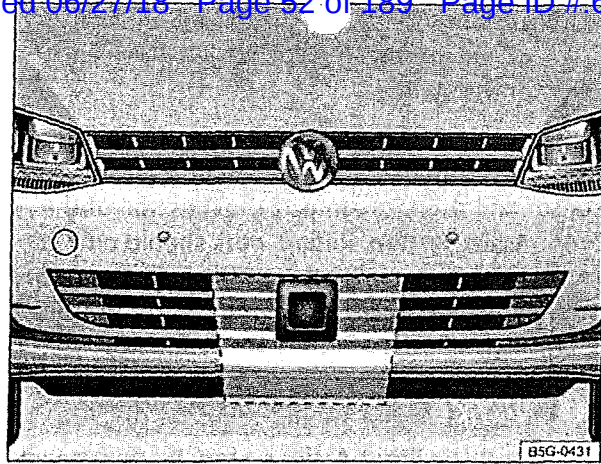


Fig. 158 Area around the radar sensor to be kept clean and free of obstructions.

ⓘ Please read the introductory information and heed the Warnings and Notice **⚠** on page 284.

A radar sensor mounted in the front bumper monitors traffic → fig. 157 **①** and can detect vehicles traveling ahead up to a distance of about 130 yards (120 m).

The radar sensor function can be impaired by things such as mud, slush, or snow, or by conditions such as heavy rain or spray. In cases like these, Front Assist will not work. The driver message **Front Assist: no sensor view!** appears in the instrument cluster display. Clean the radar sensor as required → **ⓘ**.

The Front Assist system will automatically be available again as soon as the radar sensor is no longer impaired. The message in the instrument cluster display turns off.

The function of the Front Assist system can also be impaired when the radar signal radiation is reflected, for example, in multilevel parking structures, or by nearby metallic objects such as rails or metal plates in the road.

The area in front of and around the radar sensor → fig. 158 must not be covered by objects such as stickers, additional headlights, a license plate bracket, or other things, as these items can impair the function of the Front Assist system.

Any structural modifications to the vehicle, for example, lowering the vehicle or alterations to the front end trim, can impair the function of the Front Assist system. Structural modifications should only be carried out by a qualified workshop → page 379, *Parts, accessories, repairs, and* ▶

Radar sensor

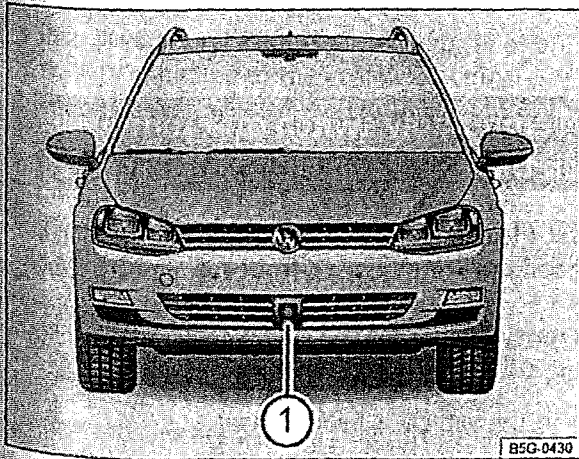


Fig. 157 In the front bumper: Radar sensor.


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Teile-Nr.: 5GM012723BB
C216GVING.23.2.2.444



5GM012723BB
Complaint & Demand for Jury Trial

D'Amore v. Volkswagen

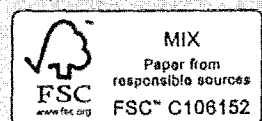


Exhibit 3 to Complaint Page 8 of 8

Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*

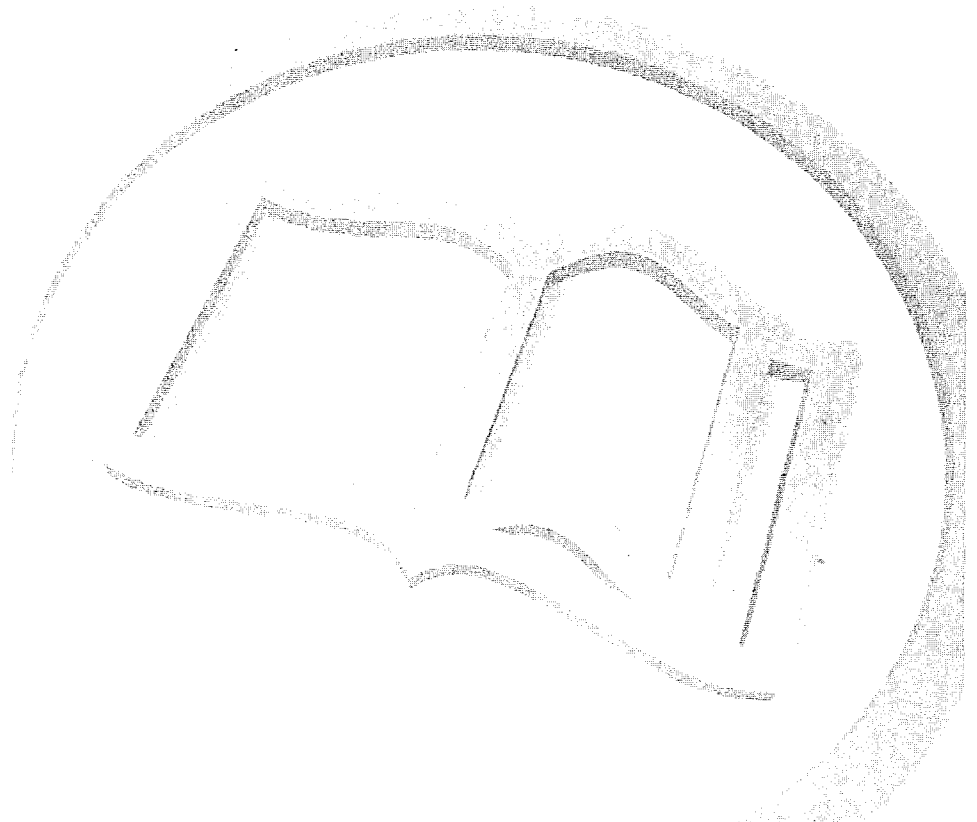
Exhibit 4



Owner's Manual


Jetta

U.S.Edition, Model Year 2016



Signs and symbols



Indicates a reference to a section with important information and safety warnings  that should always be heeded.



Arrow indicating that the section continues on the next page.



Arrow marking the end of a section.



The symbol indicates situations in which the vehicle must be stopped as quickly as possible.



The symbol indicates registered trademarks. However, the absence of this symbol does not constitute a waiver of any rights associated with intellectual property.



Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.



Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.



Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.



Cross reference to a Notice about possible property damage, in the same section or on the stated page.



Used on vehicle labels and indicates the availability of additional important information and warnings in this Owner's Manual.

DANGER

Texts with this symbol contain information regarding hazardous situations which will cause death or severe injuries if not avoided.

WARNING

Texts with this symbol contain information regarding hazardous situations which could cause death or severe injuries if not avoided.

CAUTION

Texts with this symbol contain information regarding hazardous situations which could cause minor or moderate injuries if not avoided.

NOTICE

Texts with this symbol contain information regarding situations which could cause vehicle damage if not avoided.



Texts with this symbol contain information about the environment and how you can help to protect it.



Texts with this symbol contain supplementary information.

Forward Collision Warning (Front Assist)

Introduction

In this section you'll find information about:

- Driver warnings and Autonomous Emergency Braking 271
- Radar sensor 273
- Operating Front Assist 274
- Temporarily switch off Front Assist in the following situations 274
- System limits 274

Depending on vehicle equipment, the vehicle may be equipped with Forward Collision Warning (Front Assist), which includes Forward Collision Warning and Autonomous Emergency Braking systems.

The Forward Collision Warning system, when switched on, uses a radar sensor to help prevent rear-end collisions by providing a warning of a possible collision with a vehicle on the road ahead within physical and technical limits of the system.

When Front Assist is switched on, the Autonomous Emergency Braking system can automatically apply the brakes within the Front Assist speed range to help minimize the effects of a collision.

The Front Assist system is not a substitute for the driver's full concentration.

More information:

- Exterior views → page 6
- Volkswagen Information System → page 25

- Adaptive Cruise Control (ACC) → page 260
- Parts, accessories, repairs, and modifications → page 348

WARNING

The Front Assist system technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.

- Always adjust your speed and driving style to road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Always be prepared to take full control of the vehicle at all times.

i Deactivate Front Assist if it does not work as described in this chapter, for example, if multiple unwanted warnings occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

Driver warnings and Autonomous Emergency Braking

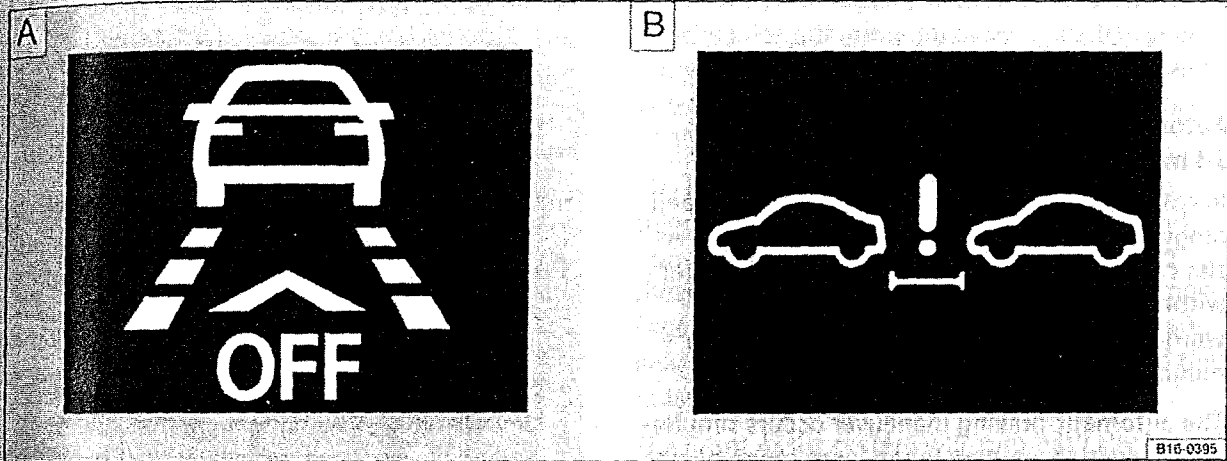


Fig. 142 In the instrument cluster display. [A]: Front Assist switched off, [B]: Distance warning.

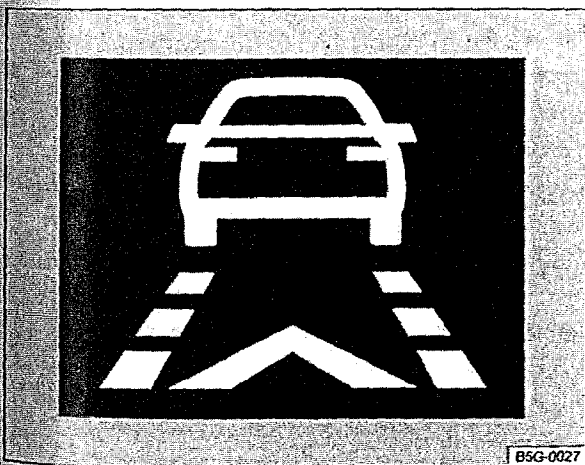


Fig. 143 In the instrument cluster display: Advance warning.

ⓘ Please read the introductory information and heed the Warnings and Notice **▲** on page 270.

Distance warning

If the vehicle is traveling within a speed range of about 44–130 mph (70–210 km/h), the system warns the driver with a message in the instrument cluster display (→ fig. 142 [B]) if it detects that the vehicle is driving too close to the vehicle ahead → **▲** in *Introduction* on page 270. No acoustic warning will sound.

The warning period varies according to the traffic situation and your driving style.

Increase the distance between your vehicle and the vehicle ahead.

Advance warning

If the vehicle is traveling within a speed range of about 18–130 mph (30–210 km/h), the system warns the driver with a warning chime and a message in the instrument cluster display (→ fig. 143) if it detects a possible collision with a vehicle ahead → **▲** in *Introduction* on page 270.

The warning period varies according to the traffic situation and your driving style. At the same time, the vehicle is prepared for possible emergency braking.

Brake or take action to avoid the vehicle ahead!

However, do not rely solely on Front Assist. Under certain conditions, the reactions of Front Assist may be unexpected or delayed from the driver's viewpoint. Always pay attention and take over if necessary → **▲**.

Immediate warning

If you fail to respond to the advance warning, within a speed range of about 18–130 mph (30–210 km/h), Front Assist can initiate a short active braking maneuver, should you not react accordingly to an advance alert. In this case you will notice brief, jerky braking of the vehicle to warn you of an impending collision.

The moment of this alert can vary, depending on the traffic situation and the driving behavior.

Autonomous Emergency Braking

If you should also fail to react to the immediate warning, within a speed range of about 3–130 mph (5–210 km/h), Front Assist can initiate an automatic braking maneuver that will abruptly ►

decelerate the vehicle with elevated braking force. The emergency braking maneuver occurs shortly before a potential collision to reduce vehicle speed and help to minimize the effects of a collision.

Autonomous Emergency Braking below 18 mph (30 km/h)

In case of an impending collision, within a speed range of about 3–18 mph (5–30 km/h), Front Assist can initiate an automatic braking maneuver without the distance, advance, or immediate warnings to reduce vehicle speed and help to minimize the effects of a collision → ▲.

The automatic braking maneuver occurs simultaneously with a warning in the instrument cluster display → fig. 143.

Braking support

Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation, should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In order for Front Assist to apply this support, it must have detected an impending collision with another vehicle ahead of yours and the brake pedal has to be hit hard and suddenly. However, this support only works as long as the brake pedal is depressed.

Front Assist considers the driver's response time to give warnings in time. This response time reduces automatically when the system, for example, detects movement of the accelerator or steering wheel. The system thus prevents unnecessary brake interventions, for example, when the driver passes another vehicle.

Front Assist cannot react when approaching standing objects ahead of you, for example, when driving up to a line of stopped vehicles in heavy traffic.

System deactivated

When Front Assist is turned off, a text message and symbol appear in the instrument cluster display → fig. 142 [A].

! WARNING

The Front Assist technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warn-


ing, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.


- Always adjust your speed, driving style, and the distance you keep between you and the vehicles ahead of you to the road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings or braking maneuvers when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Never follow a vehicle so closely that you cannot stop your vehicle safely, under certain circumstances the automatic braking function cannot slow the vehicle down in time.
- Never allow the closing speed between you and other vehicles to be so high that Front Assist may not be able to slow your vehicle safely. If closing speed is too high, you must apply the brakes yourself to reduce the risk of a rear-end crash.
- Always be prepared to take full control of the vehicle at all times.

! NOTICE

If you notice that Front Assist doesn't work properly or the sensor is damaged, switch off Front Assist immediately.

- See an authorized Volkswagen dealer or authorized Volkswagen Service Facility for assistance and have the Front Assist system checked.

 If Front Assist initiates a braking maneuver, the braking system is under pressure. In this case the braking pedal will feel "harder" and the brake pedal travel will be shorter.

 Automatic braking maneuvers can be interrupted by depressing the clutch or gas pedal, or by moving the steering wheel. ▶

o Deactivate the Front Assist system if it does not work as described in this chapter, for example, if multiple unwanted warnings or braking maneuvers occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

o When the Front Assist system is switched on, the display in the instrument cluster can be overwritten by displays related to other functions, for example, an incoming telephone call.

o The Autonomous Emergency Braking system can slow your vehicle down to a standstill, but not hold your vehicle permanently. When necessary, apply the vehicle brakes!

o Please read the introductory information and heed the Warnings and Notice on page 270.

A radar sensor mounted behind the Volkswagen emblem monitors traffic → fig. 144 ① and can detect vehicles traveling ahead up to a distance of about 130 yards (120 m).

The radar sensor function can be impaired by things such as mud, slush, or snow, or by conditions such as heavy rain or spray. In cases like these, Front Assist will not work. The driver message **Front Assist: no sensor view!** appears in the instrument cluster display. Clean the radar sensor as required → ①.

◁ The Front Assist system will automatically be available again as soon as the radar sensor is no longer impaired. The message in the instrument cluster display turns off.

The function of the Front Assist system can also be impaired when the radar signal radiation is reflected, for example, in multilevel parking structures, or by nearby metallic objects such as rails or metal plates in the road.

The area in front of and around the radar sensor → fig. 145 must not be covered by objects such as stickers, additional headlights, a license plate bracket, or other things, as these items can impair the function of the Front Assist system.

Any structural modifications to the vehicle, for example, lowering the vehicle or alterations to the front end trim, can impair the function of the Front Assist system. Structural modifications should only be carried out by a qualified workshop → page 348, *Parts, accessories, repairs, and modifications*. Contact an authorized Volkswagen dealer or an authorized Volkswagen Service Facility for assistance.

Incorrectly performed repairs to the front end of the vehicle can change the position of the radar sensor and therefore impair the function of the Front Assist system. Repair work should only be carried out by a qualified workshop. Contact an authorized Volkswagen dealer or an authorized Volkswagen Service Facility for assistance.

① NOTICE

Switch off the Front Assist system if you suspect that the radar sensor has been damaged or if its position has been changed. This can help prevent ▶

Radar sensor

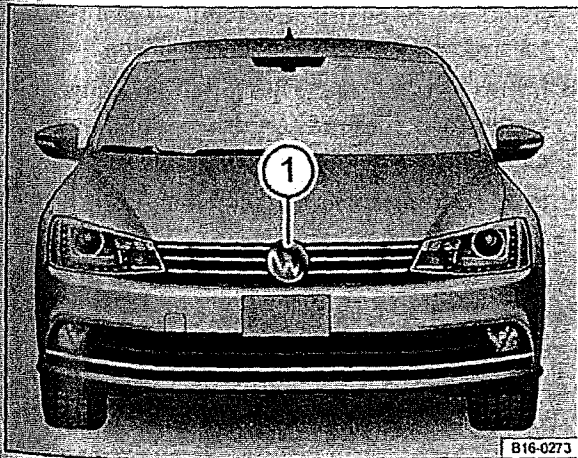


Fig. 144 Behind the Volkswagen emblem: Radar sensor.

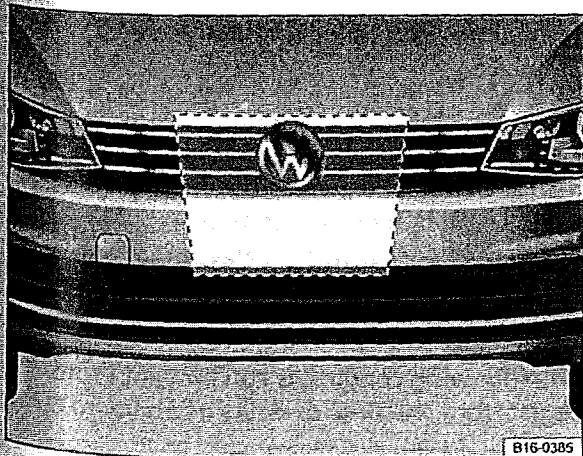


Fig. 145 Area around the radar sensor to be kept clean and free of obstructions.

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Jetta
Stand: 22.10.2015
Englisch Nordamerika: 12.2015
Teile-Nr.: 5C6012723AL
C216A6ING.23.2.2.412



5C6012723AL
Complaint & Demand for Jury Trial

D'Amore v. Volkswagen

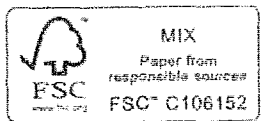


Exhibit 4 to Complaint Page 8 of 8

Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*

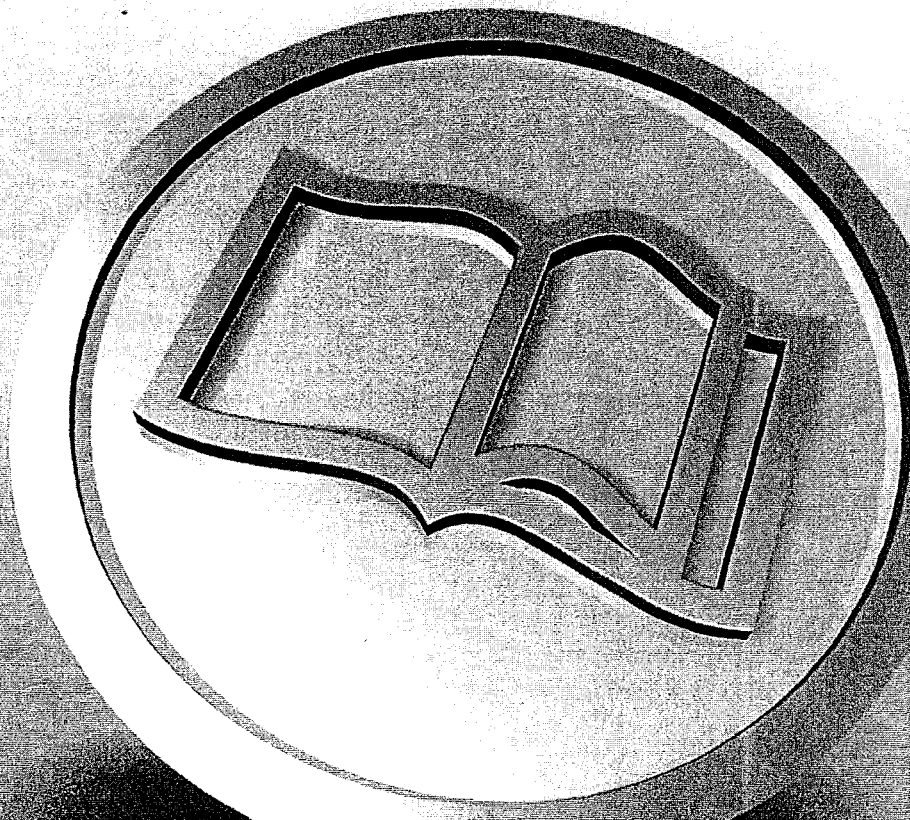
Exhibit 5


















Owner's Manual


CC

U.S. Edition, Model Year 2017



Signs and symbols

-  Indicates a reference to a section with important information and safety warnings  that should always be heeded.
-  Arrow indicating that the section continues on the next page.
-  Arrow marking the end of a section.
-  The symbol indicates situations in which the vehicle must be stopped as quickly as possible.
-  The symbol indicates registered trademarks. However, the absence of this symbol does not constitute a waiver of any rights associated with intellectual property.
-   Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.
-   Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.
-   Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.
-   Cross reference to a Notice about possible property damage, in the same section or on the stated page.
-  Used on vehicle labels and indicates the availability of additional important information and warnings in this Owner's Manual.

 **DANGER**
 Texts with this symbol contain information regarding hazardous situations which will cause death or severe injuries if not avoided.

WARNING


Texts with this symbol contain information regarding hazardous situations which could cause death or severe injuries if not avoided.


CAUTION

Texts with this symbol contain information regarding hazardous situations which could cause minor or moderate injuries if not avoided.

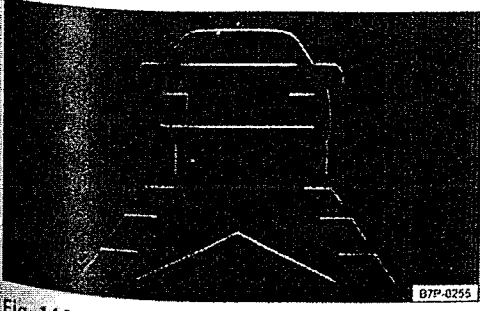
NOTICE

Texts with this symbol contain information regarding situations which could cause vehicle damage if not avoided.

 Texts with this symbol contain information about the environment and how you can help to protect it.

 Texts with this symbol contain supplementary information.





Driver warnings and Autonomous Emergency Braking



📖 Please read the introductory information and heed the Warnings and Notice ⚠️ on page 275. ▶

Fig. 148 In the instrument cluster display: Advance warning (symbol displayed in color on an instrument cluster with color display).


Warning and indicator lights

Lights up	Possible cause → 	Proper response
	The Front Assist system detected an impending collision with a vehicle driving ahead of yours ^{a)} .	Depress the brake pedal! Try to avoid a collision by braking the vehicle and/or drawing it aside according to the traffic situation!
	Front Assist system currently not available.	Park your vehicle and turn the engine off and on again. Check the sensor for damages or soiling. If the system is still not available, have it checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.
	Front Assist system is switched on and active.	-

^{a)} Displayed in color on an instrument cluster with color display.


When the ignition is switched on, several warning and indicator lights come on briefly for a function check. They go out after a few seconds.

Advance warning

If the vehicle is traveling within a speed range of about 18–130 mph (30–210 km/h), the system warns the driver with a warning chime and a message in the instrument cluster display (→ fig. 148¹⁾) If it detects a possible collision with a vehicle ahead →  in *Introduction* on page 275.

The warning period varies according to the traffic situation and your driving style. At the same time, the vehicle is prepared for possible emergency braking.

Brake or take action to avoid the vehicle ahead!

However, do not rely solely on Front Assist. Under certain conditions, the reactions of Front Assist may be unexpected or delayed from the driver's viewpoint. Always pay attention and take over if necessary → .

Immediate warning


If you fail to respond to the advance warning, within a speed range of about 18–130 mph (30–210 km/h), Front Assist can initiate a short active braking maneuver, should you not react accordingly to an advance alert. In this case you will notice brief, jerky braking of the vehicle to warn you of an impending collision.

The moment of this alert can vary, depending on the traffic situation and the driving behavior.

Autonomous Emergency Braking

If you should also fail to react to the immediate warning, within a speed range of about 3–130 mph (5–210 km/h), Front Assist can initiate an automatic braking maneuver that will **abruptly decelerate the vehicle** with elevated braking force. The emergency braking maneuver occurs shortly before a potential collision to reduce vehicle speed and help to minimize the effects of a collision.

Autonomous Emergency Braking below 18 mph (30 km/h)

In case of an impending collision, within a speed range of about 3–18 mph (5–30 km/h), Front Assist can initiate an automatic braking maneuver without the advance or immediate warnings to reduce vehicle speed and help to minimize the effects of a collision → .

The automatic braking maneuver occurs **simultaneously** with a warning in the instrument cluster display → fig. 148¹⁾.


Braking support


Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation, should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In order for Front Assist to apply this support, it must have detected an impending collision with another vehicle ahead of yours and the brake pedal has to be hit hard and suddenly. However, this support only works as long as the brake pedal is depressed.


¹⁾ Displayed in color on an instrument cluster with color display.

- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings or braking maneuvers when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Never follow a vehicle so closely that you cannot stop your vehicle safely, under certain circumstances the automatic braking function cannot slow the vehicle down in time.
- Never allow the closing speed between you and other vehicles to be so high that Front Assist may not be able to slow your vehicle

the braking system is under pressure. In this case the braking pedal will be pressed "harder" and the brake pedal travel will be shorter.

 Automatic braking maneuvers can be interrupted by depressing the clutch or gas pedal, or by moving the steering wheel.

 Deactivate the Front Assist system if it does not work as described in this chapter, for example, if multiple unwanted warnings or braking maneuvers occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

 When the Front Assist system is switched on, the display in the instrument cluster can be overwritten by displays related to other functions, for example, an incoming telephone call. <

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Owner's Manual:
CC
Stand: 05.04.2016
Englisch Nordamerika: 05.2016
Teile-Nr.: 3C8012723BD



3C8012723BD

1.042016

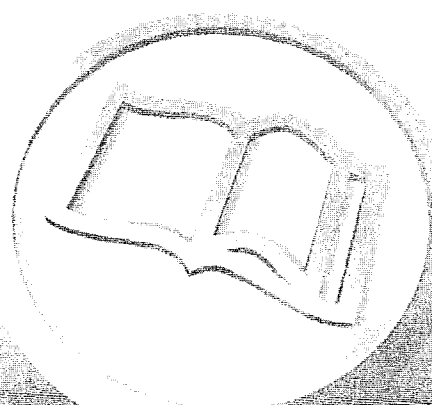
Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*









Exhibit 6



Owner's Manual
Golf SportWagen
U.S. Edition, Model Year 2017



Signs and symbols


-  Indicates a reference to a section with important information and safety warnings that should always be heeded.
-  Arrow indicating that the section continues on the next page.
-  Arrow marking the end of a section.
-  The symbol indicates situations in which the vehicle must be stopped as quickly as possible.
-  The symbol indicates registered trademarks. However, the absence of this symbol does not constitute a waiver of any rights associated with intellectual property.
-  Cross-reference to a red, orange, or yellow warning in the same section or on the stated page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.
-  Cross-reference to a notice about possible property damage, in the same section or on the stated page.
-  Used in vehicle labels and indicates the availability of additional important information and warnings in this Owner's Manual.


⚠ DANGER
 Texts with this symbol contain information regarding hazardous situations which will cause death or severe injuries if not avoided.

⚠ WARNING
 Texts with this symbol contain information regarding hazardous situations which could cause death or severe injuries if not avoided.

⚠ CAUTION
 Texts with this symbol contain information regarding hazardous situations which could cause minor or moderate injuries if not avoided.

ⓘ NOTICE
 Texts with this symbol contain information regarding situations which could cause vehicle damage if not avoided.

 Texts with this symbol contain information about the environment and how you can help to protect it.

 Texts with this symbol contain supplementary information.

Forward Collision Warning (Front Assist)

Introduction

In this section you'll find information about:

- Driver warnings and Autonomous Emergency Braking	279
- Radar sensor	281
- Operating Front Assist	282
- Temporarily switch off Front Assist in the following situations	283
- System limits	283

Depending on vehicle equipment, the vehicle may be equipped with Forward Collision Warning (Front Assist), which includes Forward Collision Warning and Autonomous Emergency Braking systems.

The Forward Collision Warning system, when switched on, uses a radar sensor to help prevent rear-end collisions by providing a warning of a possible collision with a vehicle on the road ahead within physical and technical limits of the system.

When Front Assist is switched on, the Autonomous Emergency Braking system can automatically apply the brakes within the Front Assist speed range to help minimize the effects of a collision.

The Front Assist system is not a substitute for the driver's full concentration.

WARNING

The Front Assist system technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brakes to slow the vehicle down or avoid the obstacle, depending on the traffic situation.


- Always adjust your speed and driving style to road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Always be prepared to take full control of the vehicle at all times.

Deactivate Front Assist if it does not work as described in this chapter, for example, if multiple unwanted warnings occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

Autonomous Emergency Braking

If you should also fail to react to the immediate warning, within a speed range of about 3-155 mph (5-250 km/h), Front Assist can initiate an automatic braking maneuver that will abruptly decelerate the vehicle with elevated braking force. The emergency braking maneuver occurs shortly before a potential collision to reduce vehicle speed and help to minimize the effects of a collision.

Autonomous Emergency Braking below 18 mph (30 km/h)

In case of an impending collision, within a speed range of about 3-18 mph (5-30 km/h), Front Assist can initiate an automatic braking maneuver without the distance, advance, or immediate warnings to reduce vehicle speed and help to minimize the effects of a collision → .

The automatic braking maneuver occurs simultaneously with a warning in the instrument cluster display → Fig. 159¹⁾.

Braking support


Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation within a speed range of about 3-155 mph (5-250 km/h). Should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In order for Front Assist to apply this support, it must have detected an impending collision with another vehicle ahead of yours and the brake pedal has to be hit hard and suddenly. However, this support only works as long as the brake pedal is depressed.

Front Assist considers the driver's response time to give warnings in time. This response time reduces automatically when the system, for example, detects movement of the accelerator or steering wheel. The system thus prevents unnecessary brake interventions, for example, when the driver passes another vehicle.

Front Assist cannot react when approaching standing objects ahead of you, for example, when driving up to a line of stopped vehicles in heavy traffic.

¹⁾ Displayed in color on an instrument cluster with color display.

System deactivated

If the system is switched off, a text message and symbol appear in the instrument cluster display → Fig. 158 .

The Front Assist technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.

- Always adjust your speed, driving style, and the distance you keep between you and the vehicles ahead of you to the road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings or braking maneuvers when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Never follow a vehicle so closely that you cannot stop your vehicle safely, under certain circumstances the automatic braking function cannot bring the vehicle to a stop in time.
- Never allow the closing speed between you and other vehicles to be so high that Front Assist may not be able to slow your vehicle safely. If closing speed is too high, you must apply the brakes yourself to reduce the risk of a rear-end crash.
- Always be prepared to take full control of the vehicle at all times.

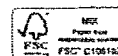
Failure to heed warning lights and instrument cluster text messages can result in a collision and serious personal injury.



Owner's Manual
Golf SportWagen
Stand: 16.05.2016
Englisch USA: 07.2016
Teil-Nr.: SGG012723BA
C117GVNG.23.2.432



SGG012723BA





Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*

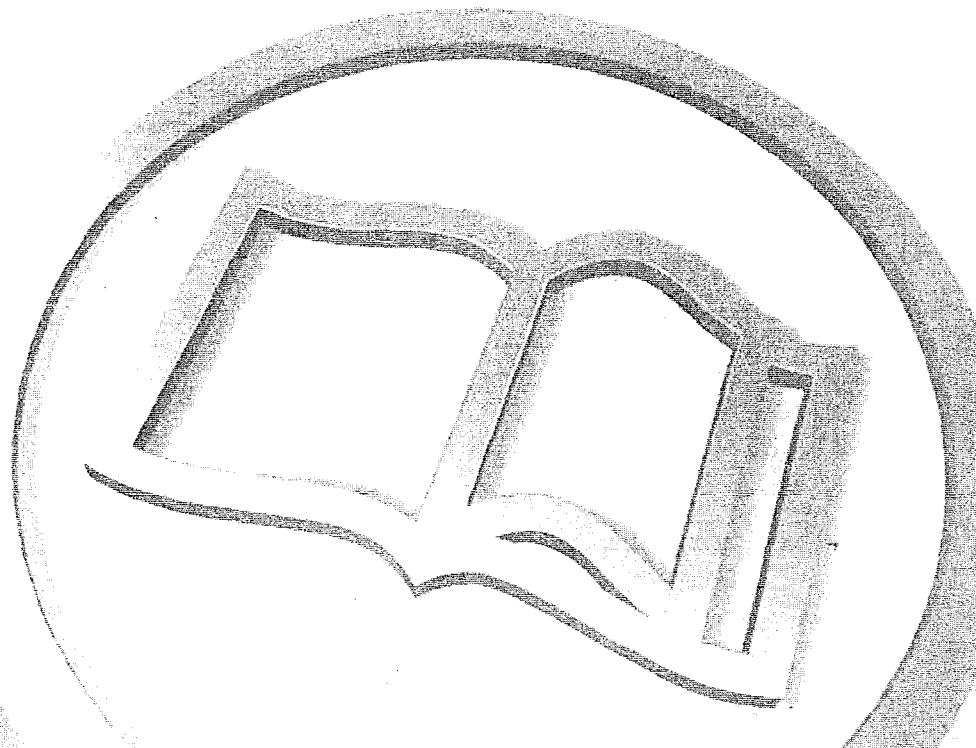
Exhibit 7



Owner's Manual


Jetta GLI, Jetta

U.S. Edition, Model Year 2017



Signs and symbols



Indicates a reference to a section with important information and safety warnings  that should always be heeded.



Arrow indicating that the section continues on the next page.



Arrow marking the end of a section.




The symbol indicates situations in which the vehicle must be stopped as quickly as possible.




The symbol indicates registered trademarks. However, the absence of this symbol does not constitute a waiver of any rights associated with intellectual property.




 Cross-reference to a red, orange, or yellow




 warning in the same section or on the stated



 page, pointing out possible risks that can cause serious personal injuries and how to help prevent them.



 Cross reference to a Notice about possible property damage, in the same section or on the stated page.



Used on vehicle labels and indicates the availability of additional important information and warnings in this Owner's Manual.

DANGER

Texts with this symbol contain information regarding hazardous situations which will cause death or severe injuries if not avoided.

WARNING

Texts with this symbol contain information regarding hazardous situations which could cause death or severe injuries if not avoided.

CAUTION

Texts with this symbol contain information regarding hazardous situations which could cause minor or moderate injuries if not avoided.

NOTICE

Texts with this symbol contain information regarding situations which could cause vehicle damage if not avoided.



Texts with this symbol contain information about the environment and how you can help to protect it.



Texts with this symbol contain supplementary information.

Forward Collision Warning (Front Assist)

Introduction

In this section you'll find information about:

- Warning and indicator lights 267
- Driver warnings and Autonomous Emergency Braking 268
- Radar sensor 270
- Operating Front Assist 271
- When to temporarily switch off Front Assist 271
- System limits 272

Depending on vehicle equipment, the vehicle may be equipped with Forward Collision Warning (Front Assist), which includes Forward Collision Warning and Autonomous Emergency Braking systems.

The Forward Collision Warning system, when switched on, uses a radar sensor to help prevent rear-end collisions by providing a warning of a possible collision with a vehicle on the road ahead within physical and technical limits of the system.

When Front Assist is switched on, the Autonomous Emergency Braking system can automatically apply the brakes within the Front Assist speed range to help minimize the effects of a collision.


The Front Assist system is not a substitute for the driver's full concentration.

WARNING



The Front Assist system technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.


- Always adjust your speed and driving style to road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.

- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Always be prepared to take full control of the vehicle at all times.

 Deactivate Front Assist if it does not work as described in this chapter, for example, if multiple unwanted warnings occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility. ◀

Warning and indicator lights

 Please read the introductory information and heed the Warnings and Notice  on page 267.

Lights up	Proper response
	Front Assist turned off, system not active. Turn Front Assist on again → page 271.

When the ignition is switched on, several warning and indicator lights come on briefly for a function check. They go out after a few seconds.

WARNING

Failure to heed warning and indicator lights and instrument cluster text messages can result in a collision and serious personal injury.

- Never ignore warning and indicator lights or text WARNINGS.
- Always heed warning and indicator lights and take action where necessary.

NOTICE

Failure to heed warning and indicator lights or text WARNINGS can result in vehicle damage. ◀

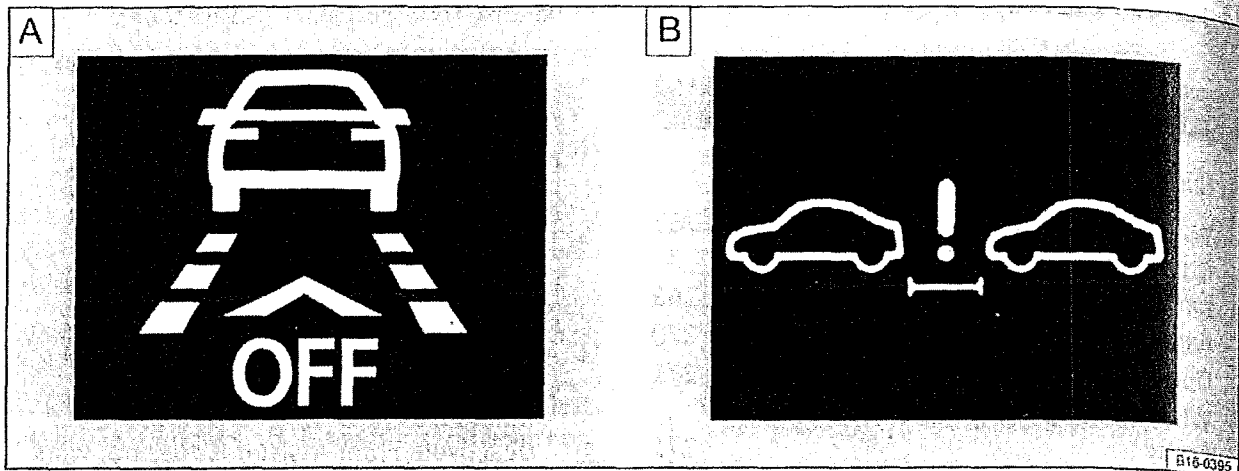


Fig. 143 In the instrument cluster display. [A]: Front Assist switched off, [B]: Distance warning.

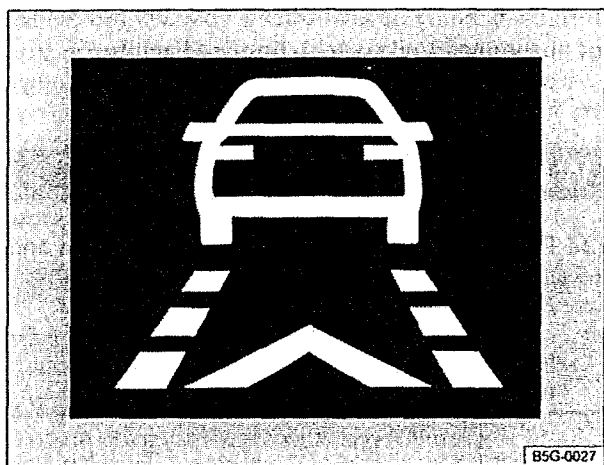


Fig. 144 In the instrument cluster display: Advance warning.

📖 Please read the introductory information and heed the Warnings and Notice ⚠️ on page 267.

Distance warning

If the vehicle is traveling within a speed range of about 44–130 mph (70–210 km/h), the system warns the driver with a message in the instrument cluster display (→ fig. 143 [B]) if it detects that the vehicle is driving too close to the vehicle ahead → ⚠️ in *Introduction* on page 267. No acoustic warning will sound.

The warning period varies according to the traffic situation and your driving style.

Increase the distance between your vehicle and the vehicle ahead.

Advance warning

If the vehicle is traveling within a speed range of about 18–130 mph (30–210 km/h), the system warns the driver with a warning chime and a message in the instrument cluster display (→ fig. 144¹⁾) if it detects a possible collision with a vehicle ahead → ⚠️ in *Introduction* on page 267.

The warning period varies according to the traffic situation and your driving style. At the same time, the vehicle is prepared for possible emergency braking.

Brake or take action to avoid the vehicle ahead!

However, do not rely solely on Front Assist. Under certain conditions, the reactions of Front Assist may be unexpected or delayed from the driver's viewpoint. Always pay attention and take over if necessary → ⚠️.

Immediate warning

If you fail to respond to the advance warning, within a speed range of about 18–130 mph (30–210 km/h), Front Assist can initiate a short active braking maneuver, should you not react accordingly to an advance alert. In this case you will notice brief, jerky braking of the vehicle to warn you of an impending collision.

The moment of this alert can vary, depending on the traffic situation and the driving behavior.


Autonomous Emergency Braking

If you should also fail to react to the immediate warning, within a speed range of about 3–130 mph (5–210 km/h), Front Assist can initiate

¹⁾ Displayed in color on an instrument cluster with color display.

an automatic braking maneuver that will abruptly decelerate the vehicle with elevated braking force. The emergency braking maneuver occurs shortly before a potential collision to reduce vehicle speed and help to minimize the effects of a collision.

Autonomous Emergency Braking below 18 mph (30 km/h)

In case of an impending collision, within a speed range of about 3–18 mph (5–30 km/h), Front Assist can initiate an automatic braking maneuver without the distance, advance, or immediate warnings to reduce vehicle speed and help to minimize the effects of a collision → .

The automatic braking maneuver occurs simultaneously with a warning in the instrument cluster display → fig. 144¹⁾.



Braking support

Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation, should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In order for Front Assist to apply this support, it must have detected an impending collision with another vehicle ahead of yours and the brake pedal has to be hit hard and suddenly. However, this support only works as long as the brake pedal is depressed.

Front Assist considers the driver's response time to give warnings in time. This response time reduces automatically when the system, for example, detects movement of the accelerator or steering wheel. The system thus prevents unnecessary brake interventions, for example, when the driver passes another vehicle.

Front Assist cannot react when approaching standing objects ahead of you, for example, when driving up to a line of stopped vehicles in heavy traffic.

System deactivated

When Front Assist is turned off, the yellow  indicator light in the instrument cluster lights up. A text message and symbol also appear in the instrument cluster display → fig. 143  (magnified view)¹⁾.

¹⁾ Displayed in color on an instrument cluster with color display.

WARNING

The Front Assist technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.

- Always adjust your speed, driving style, and the distance you keep between you and the vehicles ahead of you to the road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings or braking maneuvers when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Never follow a vehicle so closely that you cannot stop your vehicle safely, under certain circumstances the automatic braking function cannot slow the vehicle down in time.
- Never allow the closing speed between you and other vehicles to be so high that Front Assist may not be able to slow your vehicle safely. If closing speed is too high, you must apply the brakes yourself to reduce the risk of a rear-end crash.
- Always be prepared to take full control of the vehicle at all times.

WARNING

Failure to heed warning lights and instrument cluster text messages can result in a collision and serious personal injury.

- Never ignore warning lights or text WARNINGS.

NOTICE

If you notice that Front Assist doesn't work properly or the sensor is damaged, switch off Front Assist immediately.

- See an authorized Volkswagen dealer or authorized Volkswagen Service Facility for assistance and have the Front Assist system checked.

i If Front Assist initiates a braking maneuver, the braking system is under pressure. In this case the braking pedal will feel "harder" and the brake pedal travel will be shorter.

i Automatic braking maneuvers can be interrupted by depressing the gas pedal, or by moving the steering wheel with some force.

i Deactivate the Front Assist system if it does not work as described in this chapter, for example, if multiple unwanted warnings or braking maneuvers occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

i When the Front Assist system is switched on, the display in the instrument cluster can be overwritten by displays related to other functions, for example, an incoming telephone call.

i The Autonomous Emergency Braking system can slow your vehicle down to a standstill, but not hold your vehicle permanently. When necessary, apply the vehicle brakes!

Radar sensor

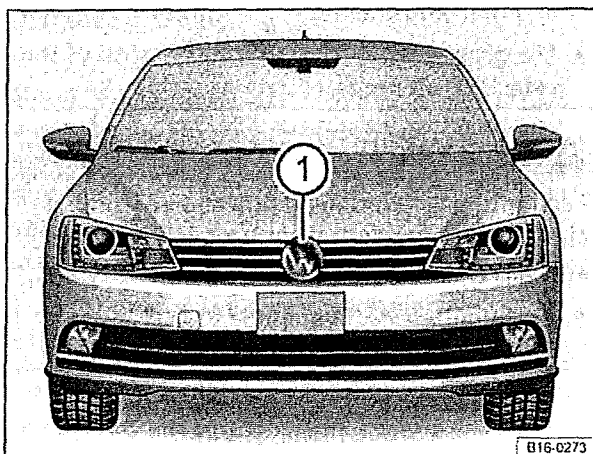


Fig. 145 Behind the Volkswagen emblem: Radar sensor.

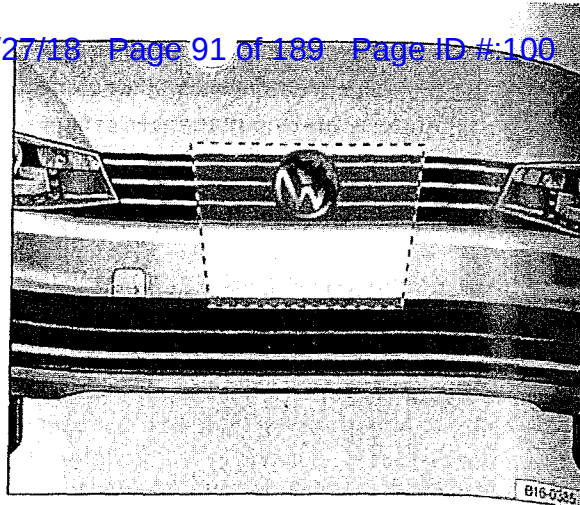


Fig. 146 Area around the radar sensor to be kept clean and free of obstructions.

ⓘ Please read the introductory information and heed the Warnings and Notice **⚠** on page 267.

A radar sensor mounted behind the Volkswagen emblem monitors traffic → fig. 145 **①** and can detect vehicles traveling ahead up to a distance of about 130 yards (120 m).

The radar sensor function can be impaired by things such as mud, slush, or snow, or by conditions such as heavy rain or spray. In cases like these, Front Assist will not work. The driver message **Front Assist: no sensor view!** appears in the instrument cluster display. Clean the radar sensor as required → **ⓘ**.

⚠ The Front Assist system will automatically be available again as soon as the radar sensor is no longer impaired. The message in the instrument cluster display turns off.

The function of the Front Assist system can also be impaired when the radar signal radiation is reflected, for example, in multilevel parking structures, or by nearby metallic objects such as rails or metal plates in the road.

The area in front of and around the radar sensor → fig. 146 must not be covered by objects such as stickers, additional headlights, a license plate bracket, or other things, as these items can impair the function of the Front Assist system.

Any structural modifications to the vehicle, for example, lowering the vehicle or alterations to the front end trim, can impair the function of the Front Assist system. Structural modifications should only be carried out by a qualified workshop → page 339, *Parts, accessories, repairs, and* ▶

Volkswagen works constantly to improve all of its products. Due to ongoing vehicle development, changes in design, equipment, and technology are possible at any time. The information about equipment, appearance, performance, dimensions, weights, fuel consumption, standards, and functions of the vehicles is the information that was available as of the editorial deadline. Some of the equipment may not be available until later or may be available only in certain markets. Contact your authorized Volkswagen dealer or authorized Volkswagen Service Facility for more information. No legal obligations or commitments may be derived from the information, illustrations, and descriptions in this Manual.

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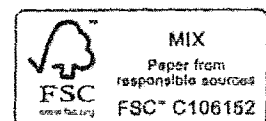
This paper was made from chlorine-free, bleached pulp.

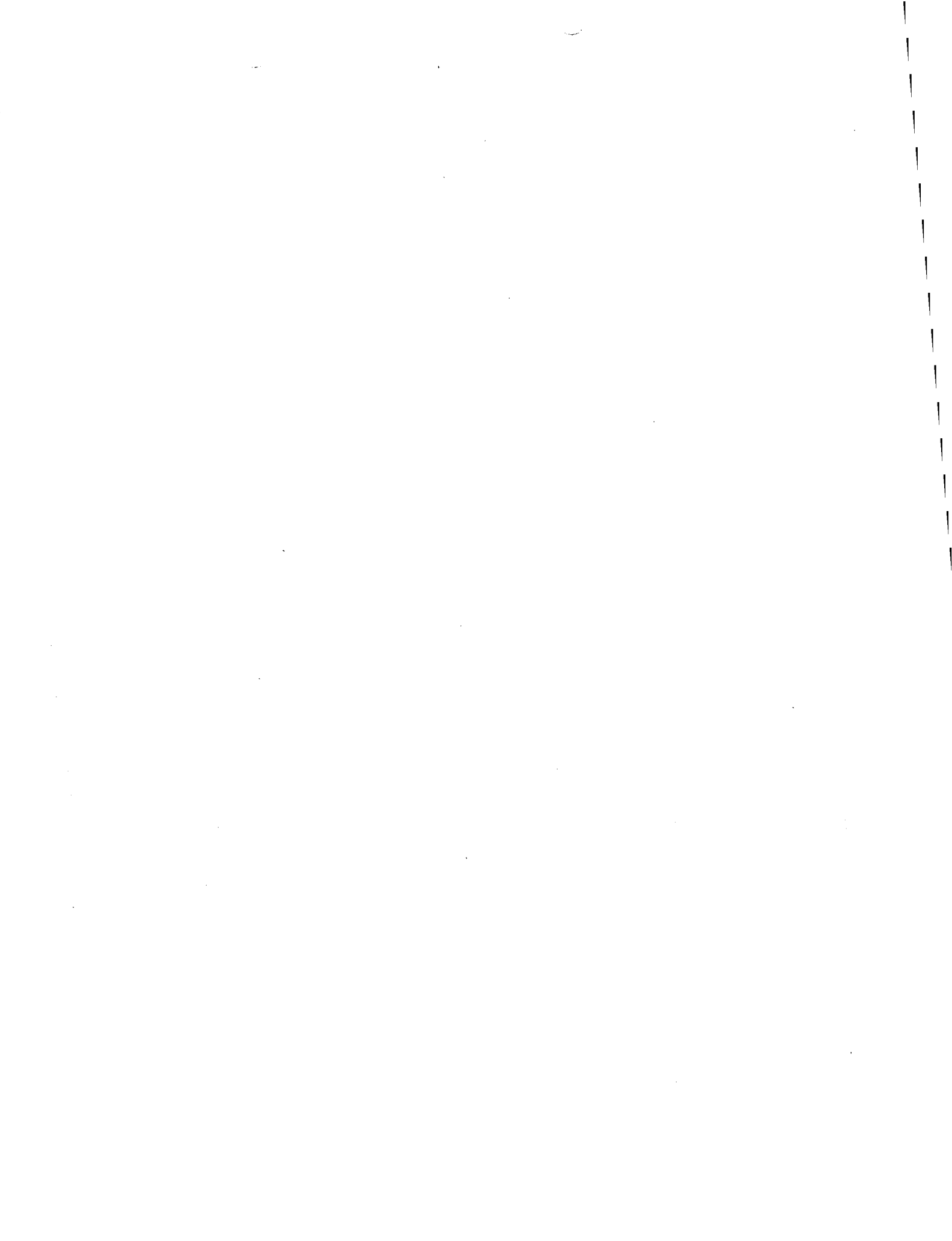


Owner's Manual:
Jetta GLI, Jetta
Stand: 13.05.2016
Englisch USA: 07.2016
Teile-Nr.: 5C6012723BC
C117A6ING.23.2.2.400



5C6012723BC
Complaint & Demand for Jury Trial





Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*

Exhibit 8

Forward Collision Warning (Front Assist)

Introduction

In this section you'll find information about:

- Driver warnings and Autonomous Emergency Braking 271
- Radar sensor 273
- Operating Front Assist 274
- Temporarily switch off Front Assist in the following situations 274
- System limits 275

Depending on vehicle equipment, the vehicle may be equipped with Forward Collision Warning (Front Assist), which includes Forward Collision Warning and Autonomous Emergency Braking systems.

The Forward Collision Warning system, when switched on, uses a radar sensor to help prevent rear-end collisions by providing a warning of a possible collision with a vehicle on the road ahead within physical and technical limits of the system.

When Front Assist is switched on, the Autonomous Emergency Braking system can automatically apply the brakes within the Front Assist speed range to help minimize the effects of a collision.

The Front Assist system is not a substitute for the driver's full concentration.

WARNING

The Front Assist system technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.

- Always adjust your speed and driving style to road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Always be prepared to take full control of the vehicle at all times.

Deactivate Front Assist if it does not work as described in this chapter, for example, if multiple unwanted warnings occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

Driver warnings and Autonomous Emergency Braking

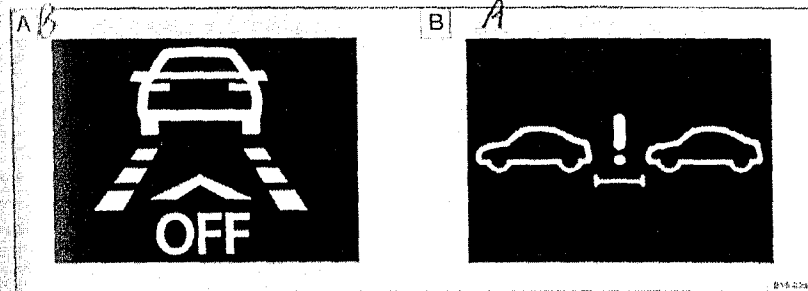


Fig. 144 Symbols in the instrument cluster display. (A): Distance warning. (B): System switched off (symbol displayed in color on an instrument cluster with color display).

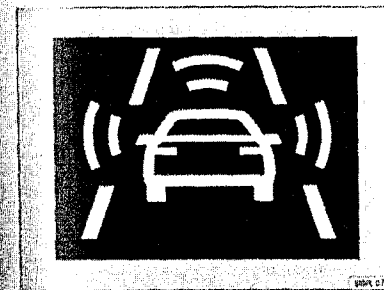





Fig. 145 In the instrument cluster display: Advance warning (symbol displayed in color on an instrument cluster with color display).

Please read the introductory information and heed the Warnings and Notice  on page 270.

Distance warning


If the vehicle is traveling within a speed range of about 44-130 mph (70-210 km/h), the system warns the driver with a message in the instrument cluster display (→ fig. 144 (A)) if it detects that the vehicle is driving too close to the vehicle ahead →  in Introduction on page 270. No acoustic warning will sound.

The warning period varies according to the traffic situation and your driving style.

 (symbol displayed in color on an instrument cluster with color display).


Increase the distance between your vehicle and the vehicle ahead.

Advance warning

If the vehicle is traveling within a speed range of about 18-130 mph (30-210 km/h), the system warns the driver with a warning chime and a message in the instrument cluster display (→ fig. 145¹⁾) if it detects a possible collision with a vehicle ahead →  in Introduction on page 270.

The warning period varies according to the traffic situation and your driving style.

Brake or take action to avoid the vehicle ahead!

However, do not rely solely on Front Assist. Under certain conditions, the reactions of Front Assist may be unexpected or delayed from the driver's viewpoint. Always pay attention and take over if necessary → .

Immediate warning

If you fail to respond to the advance warning, within a speed range of about 18-130 mph (30-210 km/h), Front Assist can initiate a short active braking maneuver, should you not react accordingly to an advance alert. In this case you will notice brief, jerky braking of the vehicle to warn you of an impending collision.

The moment of this alert can vary, depending on the traffic situation and the driving behavior. ▶

Autonomous Emergency Braking

If you should also fail to react to the immediate warning, within a speed range of about 3–130 mph (5–210 km/h), Front Assist can initiate an automatic braking maneuver that will abruptly decelerate the vehicle with elevated braking force. The emergency braking maneuver occurs shortly before a potential collision to reduce vehicle speed and help to minimize the effects of a collision.

Autonomous Emergency Braking below 18 mph (30 km/h)

In case of an impending collision, within a speed range of about 3–18 mph (5–30 km/h), Front Assist can initiate an automatic braking maneuver without the distance, advance, or immediate warnings to reduce vehicle speed and help to minimize the effects of a collision → **A**.

The automatic braking maneuver occurs simultaneously with a warning in the instrument cluster display → fig. 145¹⁾.

Braking support

Front Assist can help to minimize the effects of a collision by supporting with additional braking force in case of an emergency braking situation, should the system detect that the force applied to the brake pedal by the driver is not sufficient to avoid a collision. In order for Front Assist to apply this support, it must have detected an impending collision with another vehicle ahead of yours and the brake pedal has to be hit hard and suddenly. However, this support only works as long as the brake pedal is depressed.

Front Assist considers the driver's response time to give warnings in time. This response time reduces automatically when the system, for example, detects movement of the accelerator or steering wheel. The system thus prevents unnecessary brake interventions, for example, when the driver passes another vehicle.

Front Assist cannot react when approaching standing objects ahead of you, for example, when driving up to a line of stopped vehicles in heavy traffic.

System deactivated

If the system is switched off, a text message and symbol appear in the instrument cluster display → fig. 144 **B**; (magnified view)¹⁾.

¹⁾ Displayed in color on an instrument cluster with color display.

WARNING

The Front Assist technology cannot overcome the laws of physics and system-related limits. The driver is always responsible for braking in time. If the Front Assist system issues a warning, immediately apply the brake to slow the vehicle down or avoid the obstacle, depending on the traffic situation.

- Always adjust your speed, driving style, and the distance you keep between you and the vehicles ahead of you to the road, traffic, weather, and visibility conditions.
- The Front Assist system cannot prevent accidents and serious injuries on its own.
- The Front Assist system can issue unnecessary warnings in certain complex driving situations, for example, at traffic islands.
- The Front Assist system can issue unnecessary warnings or braking maneuvers when its function is impaired, for example, if the radar sensor is dirty or if the position of the radar sensor has been changed.
- The Front Assist system does not react to people, animals, or vehicles crossing or approaching in the same lane.
- Never follow a vehicle so closely that you cannot stop your vehicle safely, under certain circumstances the automatic braking function cannot slow the vehicle down in time.
- Never allow the closing speed between you and other vehicles to be so high that Front Assist may not be able to slow your vehicle safely. If closing speed is too high, you must apply the brakes yourself to reduce the risk of a rear-end crash.
- Always be prepared to take full control of the vehicle at all times.

NOTICE

If you notice that the Front Assist doesn't work properly or the sensor is damaged, switch off Front Assist immediately.

- See an authorized Volkswagen dealer or authorized Volkswagen Service Facility for assistance and have the Front Assist checked.

• If Front Assist initiates a braking maneuver, the braking system is under pressure. In this case the braking pedal will feel "harder" and the brake pedal travel will be shorter.

• Automatic braking maneuvers can be interrupted by depressing the clutch or gas pedal or by moving the steering wheel.

• Deactivate the Front Assist system if it does not work as described in this chapter, for example, if multiple unwanted warnings or braking maneuvers occur. Have the system checked by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.

• When the Front Assist system is switched on, the display in the instrument cluster can be overwritten by displays related to other functions, for example, an incoming telephone call.

• The Autonomous Emergency Braking system can slow your vehicle down to a standstill, but not hold your vehicle permanently. When necessary, apply the vehicle brakes!

Rear sensor

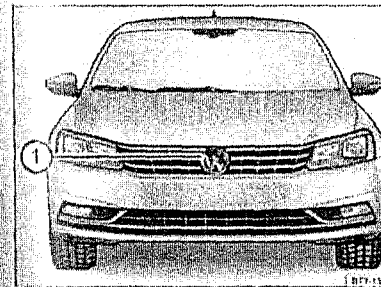


Fig. 146 In the front bumper: Radar sensor.

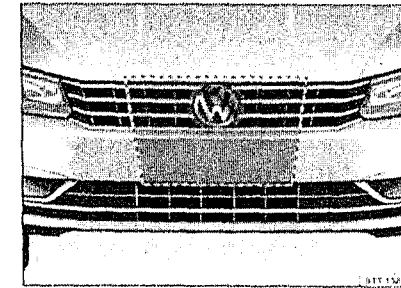


Fig. 147 Area around the radar sensor to be kept clean and free of obstructions.

• Please read the introductory information and heed the Warnings and Notice **A** on page 270.

A radar sensor mounted in the front bumper monitors traffic → fig. 146 **1** and can detect vehicles traveling ahead up to a distance of about 130 yards (120 m).

The radar sensor function can be impaired by things such as mud, slush, or snow, or by conditions such as heavy rain or spray. In cases like these, Front Assist will not work. The driver message **Front Assist: no sensor view!** appears in the instrument cluster display. Clean the radar sensor as required → **1**.

The Front Assist system will automatically be available again as soon as the radar sensor is no longer impaired. The message in the instrument cluster display turns off.

The function of the Front Assist system can also be impaired when the radar signal radiation is reflected, for example, in multilevel parking structures, or by nearby metallic objects such as rails or metal plates in the road.

The area in front of and around the radar sensor must not be covered by objects such as stickers, additional headlights, a license plate bracket, or other things, as these items can impair the function of the Front Assist system.

Any structural modifications to the vehicle, for example, lowering the vehicle or alterations to the front end trim, can impair the function of the Front Assist system. Structural modifications should only be carried out by a qualified workshop → page 356, *Parts, accessories, repairs and* ▶

modifications. Contact an authorized Volkswagen dealer or an authorized Volkswagen Service Facility for assistance.


Incorrectly performed repairs to the front end of the vehicle can change the position of the radar sensor and therefore impair the function of the Front Assist system. Repair work should only be carried out by a qualified workshop. Contact an authorized Volkswagen dealer or an authorized Volkswagen Service Facility for assistance.

NOTICE

Switch off the Front Assist system if you suspect that the radar sensor has been damaged or if its position has been changed. This can help prevent further damage. Contact an authorized Volkswagen dealer or an authorized Volkswagen Service Facility to have the radar sensor realigned.

- The radar sensor can become misaligned if it is hit, for example, when parking the vehicle. Readjusting the sensor could impair the performance of the system or cause it to switch off.
- Repairs to the radar sensor require special knowledge and tools. Contact an authorized Volkswagen dealer or an authorized Volkswagen Service Facility for assistance.
- Remove snow with a brush, and remove ice with a solvent-free deicer spray.

Operating Front Assist

Please read the introductory information and heed the Warnings and Notice  on page 270.

The Front Assist system is automatically active once the ignition is switched on → page 221, *Starting and stopping the engine.*

The advance warning and distance warning are automatically switched off when the Front Assist system is switched off.


Volkswagen recommends that the Front Assist system is switched on at all times, except in the specific situations described in this Manual → page 274, *Temporarily switch off Front Assist in the following situations.*

Turning Front Assist on or off

The Front Assist system can be turned on or off as follows when the ignition is switched on:


- In the **Assistants** menu, select the corresponding menu option → page 22, *Volkswagen Information System.*
- If the system is switched off, a text message and symbol appear in the instrument cluster display → page 271, *Driver warnings and Autonomous Emergency Braking.*


Turning the distance warning and advance warning on or off

On appropriately equipped vehicles, you can turn the distance warning and the advance warning on or off. In the **Settings** main menu, select **Assistants**, then **Front Assist**. The distance warning or the advance warning is turned on when the box next to the option is checked  → page 22, *Volkswagen Information System.*

Volkswagen recommends that the distance and advance warnings are switched on at all times.

Temporarily switch off Front Assist in the following situations

Please read the introductory information and heed the Warnings and Notice  on page 270.


Front Assist should be switched off in the following situations due to system limitations → :

- If the vehicle is being towed.
- If the vehicle is on a dynamometer test bed.
- If the vehicle is not being driven on public roads, for example, off-road or on a track.
- If the radar sensor malfunctions.
- If external force has affected the radar sensor, for example, after a rear-end collision.
- If the radar sensor is covered (even temporarily) by any accessories or other equipment, for example, auxiliary headlights.
- If the vehicle is being loaded onto a truck, ferry, or train.

WARNING

Failure to switch off Front Assist in the situations mentioned can cause accidents and serious personal injury.

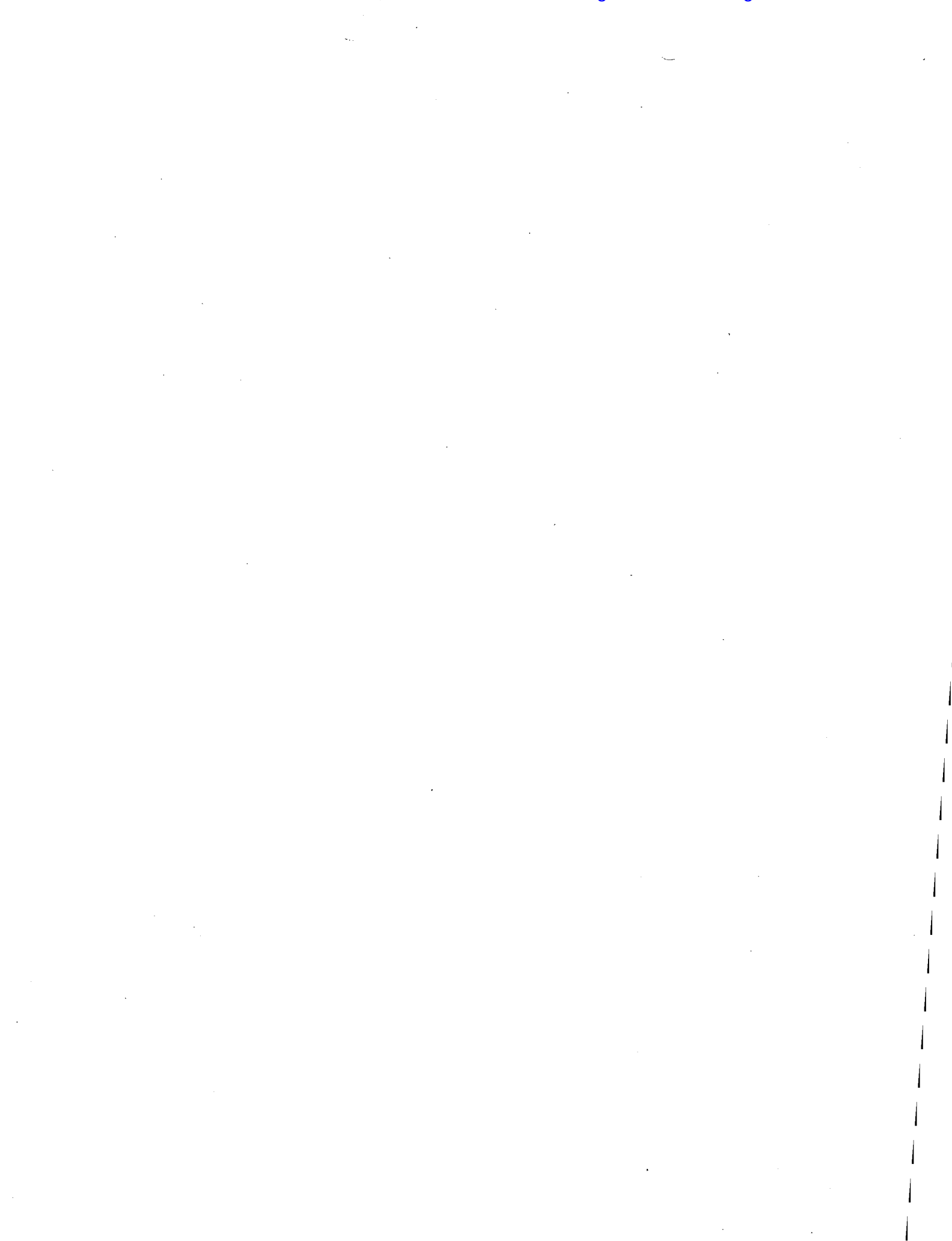
System limits

Please read the introductory information and heed the Warnings and Notice  on page 270.

Front Assist has physical and system-related limits. The driver may therefore feel that, in certain circumstances, some Front Assist reactions are unwanted or occur with a delay. You should therefore always be prepared to take full control of the vehicle whenever necessary.

The following conditions can prevent Front Assist from reacting, or delay its ability to react:

- When driving in tight curves.
- When the accelerator pedal is depressed.
- When Front Assist is switched off or if there is a fault.
- When ASR is manually switched off.
- When the ESC is taking corrective action.
- When several brake lights on the vehicle or on a trailer connected to the vehicle electrical system are faulty.
- When the radar sensor is dirty or covered.
- When there are metal objects, for example, tracks or metal plates in the road.
- When the vehicle is in Reverse (R).
- When weather conditions are poor.
- When narrow vehicles, such as motorcycles, are moving in front of your vehicle.
- When vehicles are traveling slightly offset to the left or right in front of your vehicle.
- When vehicles are crossing in front of your vehicle.
- When there is oncoming traffic.
- When the system cannot detect the traffic situation clearly.
- When loads or attachment parts on other vehicles in front of your vehicle protrude to the side, rear, or above the normal vehicle dimensions.



Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*

Exhibit 9



Media Information

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FOR IMMEDIATE RELEASE: September 12th, 2016

2017 VOLKSWAGEN PASSAT: MORE STANDARD EQUIPMENT MAKES FOR THE BEST PASSAT YET

- *Pricing starts at \$22,440 for the 1.8T S model, including 6-speed Tiptronic® automatic transmission*
- *Forward Collision Warning and Autonomous Emergency Braking (Front Assist) now standard across all trims*
- *Blind Spot Monitor with Rear Cross Traffic Alert now standard on R-Line® and SE trims*
- *New V6 SE with Technology model joins lineup*
- *Improvement in standard equipment on R-Line and SE with Technology trims*
- *Available Volkswagen Car-Net® App-Connect offers compatible smartphone integration with Apple CarPlay®, Android Auto™ and MirrorLink®*
- *Built in America, at the world's only LEED® Platinum-certified manufacturing facility in Chattanooga, Tennessee.*

Herndon, VA – The 2017 Volkswagen Passat is a midsize sedan that is designed for the American lifestyle and built in Volkswagen's state-of-the-art factory in Chattanooga, Tennessee. It features a winning combination of interior and exterior design, advanced technology, available driver assistance features, and a powerful and highly efficient base engine.

New for 2017

Redesigned in 2016 with fresh sheetmetal, a revised interior and new connectivity and available driver assistance systems, the Passat sees relatively minor changes for 2017. However, the trim structure has been

repositioned, with driver assistance, connectivity, and convenience features being moved into lower trim lines, thus offering a great value story.

The R-Line model takes a step up with features that include: Composition Media touchscreen radio with USB connectivity, voice control, SiriusXM Satellite Radio® 3-month trial, and Volkswagen Car-Net® App-Connect technology; Forward Collision Warning and Autonomous Emergency Braking (Front Assist); Blind Spot Monitor with Rear Traffic Alert; a power driver seat; V-Tex leatherette seating surfaces; and heatable front seats. An available Lighting Package adds LED headlamps with LED DRLs and LED taillights.

The SE adds KESSY® keyless access with push-button start and Blind Spot Monitor with Rear Traffic Alert, as well as an available Lighting Package that takes the R-Line lighting package features and adds foglights. The SE with Technology model, available with either the 1.8T or VR6 engine, adds remote start, Park Distance Control (Park Pilot), 18-inch aluminum-alloy wheels, and LED headlamps and taillights. Pricing for the 2017 Volkswagen Passat with standard 6-speed automatic transmission starts at \$22,440 (plus \$820 destination).

Exterior

The 2017 Passat features the styling upgrades that were introduced for the 2016 model's facelift. Slimmer headlights, a more substantial fully chromed four-bar grille, and the muscular hood all work together to give the Passat a wide, planted stance from the front. Standard chrome window surrounds and trim on the doors add to the premium nature of the design, as do available LED headlights and LED taillights.

At the rear, the bumper and trunk lid help to shape the 2017 Passat's look. The car has a premium European-style flush rear license plate area and a chrome strip on the trunk that connects the trunk lid to the taillights, making the rear lights appear lower and enhancing the grounded appearance.

The 2017 Passat remains a generously-proportioned four-door sedan. Nose to tail it measures 191.9 inches and features a stretched 110.4-inch wheelbase and 72.2-inch width, which allows for an exceptional 39.1 inches of rear-seat legroom. The Passat can be had in 8 colors, including Urano Gray, which is available exclusively for the 2017 Passat R-Line.

The 2017 Passat R-Line is the most sporting variant, featuring unique rocker panels, a stylized front bumper with contrasting black accents, a modified rear diffuser, and anthracite-color Salvador aluminum-alloy 19-inch wheels shod with 235/40 all-season tires.

Select 2017 Passat models have an Easy Open trunk, which allows the driver to sweep their foot under the rear bumper to activate a sensor near the rear of the vehicle, opening the trunk hands-free. The driver's key must be within three feet of the trunk to use the Easy Open feature.

Interior

Designed and specifically tailored for the U.S. market, the Passat delivers plenty of space for five adults. Ingress and egress is nearly effortless with large, wide-opening doors, and the large trunk can accommodate 15.9 cubic feet of luggage.

Inside the 2017 Passat, the dashboard and center console, along with integrated two-tone decor panels, are first to catch the eye. The top of the dashboard is structured with sharp contours and a sculpture line, acting to frame the elements underneath. The instrument cluster features two large dial faces and a display screen set between them, while a frameless rearview mirror (available on the SE with Technology trim and above) provides an understated touch of elegance. Chrome trim pieces—including the bezels around the air vents, upper door trim, cupholders, and shift lever—help to add to the premium feel of the interior. The R-Line adds stainless steel pedal caps, a multi-function steering wheel with paddle shifters and R-Line specific door sill plates and décor.

The seats are exceptionally comfortable: even in the base version, the driver's seat adjusts eight ways, including lumbar. Eight-way power adjustable front seats are standard for R-Line models and up. Cloth trim is standard on the base S model, while the R-Line and SE trim feature Volkswagen's perforated V-Tex leatherette seating surfaces as standard, with contrast piping on Cornsilk Beige and Moonrock Grey interiors. SEL Premium models receive Vienna leather seating surfaces.

Infotainment Systems

The 2017 Passat features MIB II, the latest generation of Volkswagen infotainment systems. With touchscreens as standard equipment on all models, MIB II is available with either a 5- or 6.33-inch display across three trim head units (Composition Color, Composition Media, and Discover Media), all offering an impressive range of features. On most models, the display utilizes a capacitive touch sensor (similar to smartphone and tablet technology) that enables gesture controls like swiping and pinch-zooming, as opposed to resistive touchscreens that require pressure and have slightly longer response times. MIB II also features a proximity sensor, which can detect when a hand is nearby and automatically switches its display to allow easier selection of specific features. USB and Bluetooth® connectivity for compatible devices are standard on all 2017 Passat models. Two phones can connect at the same time and occupants are able to make and receive calls on each.

The MIB II system also serves as the foundation for Volkswagen's available Car-Net®, one of the most comprehensive suites of connected vehicle services and features available in the automotive industry. Car-Net features include App-Connect technology which allows integration with three major smartphone platforms—Apple CarPlay®, Android Auto™ and MirrorLink®—allowing integration for compatible smartphones.

With Car-Net Security & Service features, available on the SE models and above, you can use your laptop or compatible smartphone to locate your parked car, access a vehicle health report, make service appointments, load destination information before leaving the house (or get information while on the go), and much more. Security & Service also has Family Guardian capabilities: owners can set boundary or speed alerts for their Volkswagen models, and receive a text or email message if their set speed limit or approved area is exceeded. Automatic crash notification, manual emergency calling, and Roadside Assistance features are also included. Remote door locks are also accessible through the Car-Net Security & Service mobile app.

On SE w/Technology models and above, Car-Net Guide & Inform features include a 3-month trial of traffic updates with SiriusXM Traffic. A three-month trial of SiriusXM Travel Link, which provides weather, sports, news, ski resort and movie information, and gas prices, is available as well. The built-in navigation system that is fitted to this trim can learn your most frequent destinations so you can quickly choose a location rather than enter the same details over and over. The destination interface can predict and auto-complete search requests as you enter a location.

Powertrains

The 2017 Passat lineup features two engine options: the 1.8-liter TSI® turbocharged four-cylinder or a powerful 3.6-liter VR6®.

The four-cylinder Gen 3 EA888 turbocharged and direct-injection engine is made in Silao, Mexico. This 1.8-liter engine produces 170 horsepower at 4,800 rpm and 184 pound-feet of torque from 1,500 rpm on regular gasoline. The EPA estimated fuel economy is 23 mpg city and 34 mpg highway. Passat models equipped with the 1.8-liter engine are offered with a 6-speed automatic transmission.

The 3.6-liter VR6 makes the 2017 Passat a true sport sedan. Producing an impressive 280 horsepower at 6,200 rpm and 258 lb-ft of torque at 2,500 rpm with premium fuel, it offers power and luxury-class driving comfort with surprising fuel economy—EPA estimated highway mileage is 28 mpg. The VR6 is capable of running on regular gasoline. Shifting on the Passat VR6 is handled by a standard 6-speed DSG® dual-clutch automatic transmission, which features steering wheel-mounted paddle shifters on the SEL Premium.

Chassis

The Passat has been designed to feature the kind of dynamic handling and precise steering that drivers have come to expect of a Volkswagen. Its front suspension features damper struts with robust lower control arms, coil springs, and an anti-roll bar. At the rear, there's a sophisticated four-link independent layout with telescopic dampers and an anti-roll bar. The electro-mechanical power steering is weighted to provide a balance between precision at highway speeds and lower steering weight at parking speeds.

Safety

With a combination of structural and technological advancements, the 2017 Passat has been engineered to meet or exceed all existing safety standards, and additional structure was added in order to meet the strictures of the Insurance Institute for Highway Safety's small overlap test. Additional sheetmetal has been added to the sills, crash rail, and footwell, featuring high-strength steel for extra rigidity without adding weight.

Volkswagen's Automatic Post-Collision Braking System, first launched on the 2015 Golf, comes standard on every Passat for 2017. The system builds on the premise that a collision is rarely a single, instantaneous action, but rather a series of events that follow the initial impact—which can cause additional collisions. The Automatic Post-Collision Braking System helps address this by applying the brakes after a primary collision is detected by the airbag sensors, thus helping to reduce residual kinetic energy and, in turn, reduce the chance of additional damage.

Driver Assistance

Every 2017 Passat model is equipped with a standard rearview camera, to aid drivers while in reverse. The camera image is projected on the touchscreen in the center stack and the MIB II units allow the brightness of the camera image to be adjusted independently of the rest of the display.

Adaptive Cruise Control (ACC) uses forward facing radar to maintain a set speed while helping maintain a set distance to the vehicle in front. The driver sets the speed and the desired spacing via buttons on the multifunction steering wheel and can use the accelerator, brake pedal, or a steering wheel button to cancel or override the ACC function. All system messages appear in the central multifunction display.

When the roadway ahead of the vehicle is clear, the system can maintain the driver's set speed. ACC can match a vehicle's speed in front down to 12 mph, as well as resume ACC control after the driver presses the "resume" button on the steering wheel when the speed is above 16 mph. ACC is standard on SE w/ Technology models and up.

Forward Collision Warning and Autonomous Emergency Braking (Front Assist) uses the same radar as ACC to help warn the driver of critical front-end collision situations, visually with a warning symbol in the instrument cluster and acoustically above 31 mph. If the driver fails to brake, Autonomous Emergency Braking is activated to help slow the vehicle. If the brake pedal is applied but the driver brakes too lightly, the brake pressure is increased by the system. In 2017, Front Assist is standard on all trim levels.

The available Blind Spot Monitor system uses two radar sensors at the rear of the vehicle to scan the approaching traffic and help warn drivers of vehicles in adjacent lanes. If the driver uses the turn signal to indicate a lane change while a vehicle is detected in a blind spot, or a vehicle is approaching in the adjacent lane, the system utilizes a flashing LED symbol in the outer area of the side mirrors. Blind Spot Monitor is standard on R-line models and up.

The available Rear Traffic Alert system not only helps alert the driver to stationary and moving vehicles directly behind, but also helps to detect vehicles approaching from the side (above 3 mph) that may be difficult for the driver to see while reversing. It offers a sizable range of about 65 feet, and can present a visual and an acoustic warning, before applying the brakes if a potential impending collision is detected. The system is activated by selecting reverse gear. Rear Traffic Alert with braking is standard on R-line models and up.

If the vehicle does not detect steering wheel input for a defined period of time, the available Lane Departure Warning system (Lane Assist) actively counter steers to keep the vehicle in the lane when above 40 mph and lane markings are visible. The system's camera recognizes visible lane markings and, using a special algorithm, determines the vehicle position in the lane. If the vehicle crosses a lane marking without the driver using a turn signal, the system provides a visual signal in the instrument cluster, asking the driver to take over. Lane Assist is standard on SEL Premium models, which are also equipped with the Active Blind Spot Monitor system with corrective steering. If the driver uses the turn signal to indicate a lane change or if the front facing camera senses a lane change, the driver will not only be warned through the flashing LED symbol, but the car will also help actively keep the car in its lane within the limits of Lane Assist.

Available Park Distance Control (Park Pilot) uses ultrasonic sensors located in the front and rear bumpers to monitor a range of up to five feet in front of or behind the vehicle. The system is activated when reverse gear is engaged or below a speed of 9 mph and helps provide guidance when parking or in tight situations. The system provides static and dynamic guidance lines in the camera screen when reversing to assist the driver in assessing distances for parallel and perpendicular parking. It also presents visual warnings when the car starts to approach parked cars or static objects from the front or rear, unless turned off. Park Pilot is standard on SE models equipped with the Technology Package and up.

The available Parking Steering Assistant (Park Assist) can automatically steer the car into parallel and perpendicular parking spaces in reverse. After pressing the Park Assist button—once for parallel and twice for perpendicular—the driver needs to actively control the accelerator and brake and gear selection, as Park Assist automatically steers the vehicle into the parking space. The driver can override or deactivate the steering assistance at any time by turning the steering wheel, disengaging reverse gear or pressing the system button. Below 25 mph, the system scans both the left-hand and right-hand sides of the road, for example in a one-way street, for any parking spaces as it drives past. By activating the turn signal, the driver stipulates which side of the road they wish to park on. Park Assist is standard on SEL Premium models.

Model Line-up

1.8T S

\$22,440 MSRP (plus \$820 destination) with automatic transmission

1.8T R-Line

\$23,975 MSRP (plus \$820 destination) with automatic transmission

1.8T SE

\$25,495 MSRP (plus \$820 destination) with automatic transmission

1.8T SE w/ Technology

\$27,995 MSRP (plus \$820 destination) with automatic transmission

V6 SE w/ Technology

\$29,295 MSRP (plus \$820 destination) with automatic transmission

1.8T SEL Premium

\$30,995 MSRP (plus \$820 destination) with automatic transmission

V6 SEL Premium

\$33,995 MSRP (plus \$820 destination) with automatic transmission

Competitive Set

Ford Fusion

Honda Accord
Nissan Altima
Toyota Camry

Building in America

Volkswagen's Chattanooga plant is the only automotive factory in the world to be certified Platinum in Leadership in Energy & Environmental Design (LEED) by the U.S. Green Building Council. A state-of-the-art \$40 million employee training center ensures adherence to Volkswagen's exacting quality standards. Volkswagen will be investing a total of approximately US\$900 million in the production of a newly developed, seven-passenger SUV, creating 2,000 additional jobs in the US. About \$600 million will be invested in Tennessee. For more information go to: www.volkswagenpamerica.com/chattanooga.

About Volkswagen of America, Inc.

Founded in 1955, Volkswagen of America, Inc., an operating unit of Volkswagen Group of America, Inc., (VWoA) is headquartered in Herndon, Virginia. It is a subsidiary of Volkswagen AG, headquartered in Wolfsburg, Germany. VWoA's operations in the United States include research and development, parts and vehicle processing, parts distribution centers, sales, marketing and service offices, financial service centers, and its state-of-the-art manufacturing facility in Chattanooga, Tennessee. The Volkswagen Group is one of the world's largest producers of passenger cars and Europe's largest automaker. VWoA sells the Beetle, Beetle Convertible, CC, e-Golf, Golf, Golf GTI, Golf SportWagen, Golf Alltrack, Golf R, Jetta, Passat, Tiguan, and Touareg vehicles through approximately 652 independent U.S. dealers.

Notes:

This press release and images of the 2017 Passat are available at media.vw.com. Follow us @VWNews.

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Features and technical data apply to models offered in the USA. They may differ in other countries.

All prices listed are the Manufacturer's Suggested Retail Price and exclude destination, taxes, title, options, and dealer charges. Dealer sets actual prices.

VR6Where stated, fuel economy values (mpg) are EPA estimates. See www.fueleconomy.gov for details. Actual mileage will vary and depends on several factors including driving habits and vehicle condition.

Always pay careful attention to the road, and do not drive while distracted. Not all features available on all operating systems. Standard text and data usage rates apply. App-Connect features require compatible device, operating system, and mobile apps. See mobile device and app providers for terms and privacy.

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Verizon Telematics, Inc. is service provider of VW Car-Net Security & Service. Available on select models. Trial or paid subscription required. VW Car-Net Security & Service services require vehicle cellular connectivity and availability of vehicle GPS signal; certain services may collect location information. See Terms of Service, Privacy Policy, and other details at www.vw.com/carnet. Always pay careful attention to the road, and do not drive while distracted.

See Owner's Manual for further details and important warnings about the keyless ignition feature. Do not leave vehicle unattended with the engine running, particularly in enclosed spaces.

Driver assistance features are not substitutes for attentive driving. See Owner's Manual for further details, and important limitations.

Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*

Exhibit 10

4/6/2018

Front crash prevention tests



About our tests

IIHS evaluates a vehicle's crashworthiness with the help of six tests: moderate overlap front, driver-side small overlap front, passenger-side small overlap front, side, roof strength and head restraints & seats. For front crash prevention ratings, the Institute conducts low- and moderate-speed track tests of vehicles with automatic braking systems. IIHS also conducts evaluations of headlight systems and of the child seat attachment hardware known as LATCH. The descriptions below explain how each test is conducted and how the results translate into **ratings**.

IIHS launched its front crash prevention rating program in 2013 to help consumers sort through a maze of technologies and zero in on the most effective systems. The ratings are based on research by HLDI indicating that forward collision warning and autobrake systems help drivers avoid front-to-rear crashes at both **low speeds** and **moderate speeds**.

Under the three-tier rating program, models with optional or standard front crash prevention systems are rated as superior, advanced or basic. Ratings are determined by whether the vehicles have available autobrake, and, if so, how it performs in tests at 12 and 25 mph. The availability of forward collision warning also is factored in.

For a superior rating, a vehicle must have an autobrake system that can avoid a crash or substantially reduce speeds in both tests. For an advanced rating, a vehicle must have autobrake and avoid a crash or reduce speeds by at least 5 mph in 1 of 2 tests. Vehicles that have a warning system only earn a basic rating, provided the system meets National Highway Traffic Safety Administration performance criteria.

How the tests work

IIHS evaluates the stopping capabilities of vehicles equipped with autobrake in two tests at 12 and 25 mph on the Vehicle Research Center test track. In each, an engineer drives the vehicle straight toward a stationary target designed to simulate the back of a car. Since running into an actual car puts the test driver at risk and is expensive, IIHS uses an inflatable target as a stand-in. Under the vinyl cover, inflatable tubes and foam sit on a metal frame, which is then affixed to metal guides on the track to keep the target from moving until it is struck by the test vehicle. A GPS system and other sensors monitor the test vehicle's lane position, speed, time to collision, braking and other data. An onboard camera captures each test run from the driver's perspective and monitors any warnings issued by the front crash prevention systems.

The Institute awards points based on how much the systems slow the vehicle to avoid hitting the target or lessen the severity of the impact in the two tests. In the case of an unavoidable collision, lowering the striking vehicle's speed reduces the crash energy that vehicle structures and restraint systems have to manage. That

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Front crash prevention tests

reduces the amount of damage to both the striking and struck car and minimizes injuries to people traveling in them.

To earn a point for forward collision warning, the system must meet NHTSA criteria. That means the system must issue a warning before a specified time in 5 of 7 test trials under three scenarios. The agency identifies vehicles with systems that meet the standard as part of its online ratings.

Point system

Vehicles can earn a maximum of 6 points for front crash prevention. Points are awarded as follows:

	12 mph test			25 mph test				Forward collision warning
Speed reduction (mph)	less than 5.5 to 9; 10 or more			less than 5.5 to 9; 10 to 21; 22 or more				n/a
Points	0	1	2	0	1	2	3	1

Models with 1 point earn a basic rating. A total of 2 to 4 points qualifies a vehicle for an advanced rating, and 5 to 6 points earn a superior rating.

Some vehicles advertised as having autobrake along with forward collision warning earn only 1 point and a basic rating if the autobrake fails to slow the vehicle enough to earn points in IIHS tests. If the Institute hasn't tested a vehicle's autobrake system, but NHTSA recognizes its forward collision warning system, the vehicle gets a rating of "basic; autobrake not tested."

Information on the availability of other crash avoidance features, not yet tested by the Institute, can be found [here](#).

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Complaint
&
Demand for Jury Trial

*D'Amore v. Volkswagen Group
of America, Inc.*

Exhibit 11

4/6/2018

2016 Volkswagen CC



2016 Volkswagen CC

Midsized luxury car



2016 Volkswagen CC

CRASHWORTHINESS

Small overlap front

Driver-side



Passenger-side



Moderate overlap front



Side



Roof strength



Head restraints & seats



CRASH AVOIDANCE & MITIGATION

Front crash prevention



FCW NOT QUALIFIED
autobrake not tested

Headlights



CHILD SEAT ANCHORS (LATCH)
EASE OF USE

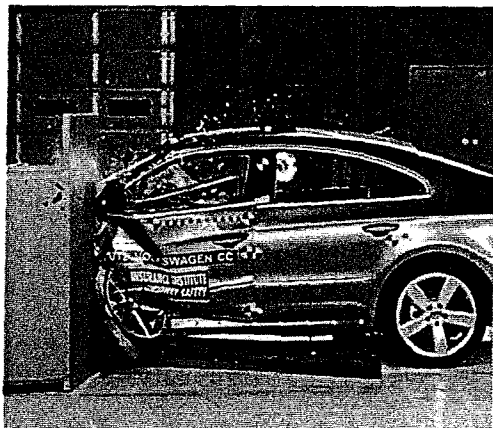


Check for NHTSA recalls

The photos and videos shown here may be of a different model, model year or body type from the one selected. The ratings of one vehicle often apply to other models if they are built on the same platform. In addition, a test of a vehicle from one model year may apply to earlier or later model years if the vehicle hasn't been significantly redesigned.

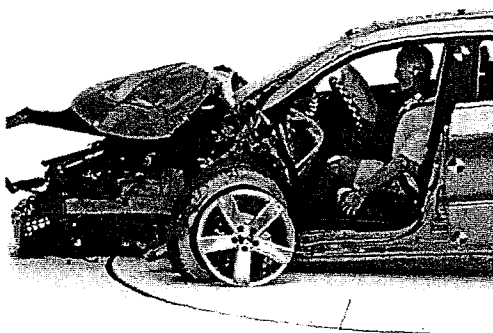
4/6/2018

2016 Volkswagen CC



Small overlap front: — Driver-side —

Action shot taken during the small overlap frontal crash test.



Small overlap front: — Driver-side —

The dummy's position in relation to the door frame, steering wheel, and instrument panel after the crash test indicates that the driver's survival space wasn't maintained well.



Small overlap front: — Driver-side —

During the crash, the dummy's head and torso barely contacted the airbag before sliding off to the left, and the seat belt allowed the dummy to move too far forward, as is evident from the gap between the seat back and the dummy's torso.

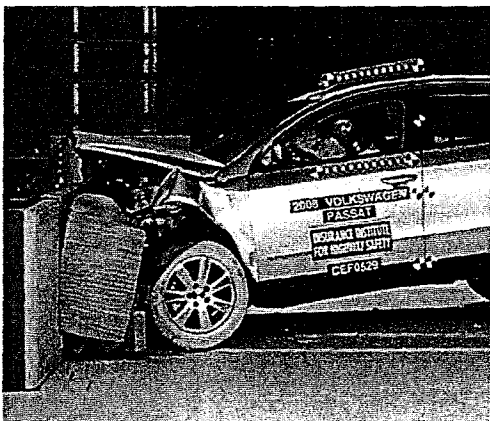
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2016 Volkswagen CC



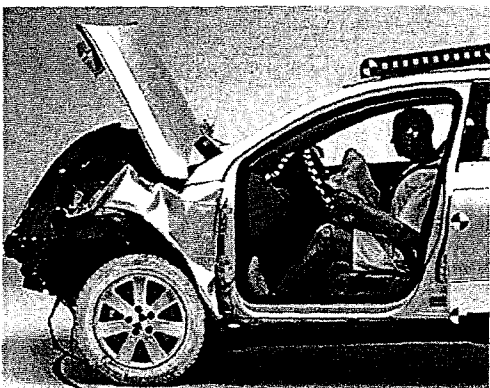
Small overlap front: — Driver-side —

Despite extensive intrusion of the door hinge pillar and instrument panel, risk of injury was moderate and limited to the left thigh



Moderate overlap front —

Action shot taken during the frontal offset crash test of the Volkswagen Passat.



Moderate overlap front —

The dummy's position in relation to the steering wheel and instrument panel after the crash test indicates that the driver's survival space was maintained well.

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2016 Volkswagen CC



Moderate overlap front —

Smearred greasepaint above the dummy's head indicates where the head hit the roof rail and grab handle during rebound. Head accelerations from these hits were low.



Moderate overlap front —

Intrusion into the driver's space was minimal, and all leg and foot injury measures were low.



2012 Volkswagen CC driver-side small overlap test

Applies to 2009-17 models



2006 Volkswagen Passat moderate overlap test

Applies to 2009-17 models

Other model years

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2016 Volkswagen CC

Model year	Small overlap front		Moderate overlap front	Side	Roof strength	Head restraints & seats	Front crash prevention	Headlights	LATCH ease of use
	Driver	Passenger							
2017		not rated					FCW NOT QUALIFIED autobrake not tested		
2016		not rated					FCW NOT QUALIFIED autobrake not tested		
2015		not rated					NOT AVAILABLE	not rated	not rated
2014		not rated					NOT AVAILABLE	not rated	not rated
2013		not rated					NOT AVAILABLE	not rated	not rated
2012		not rated						not rated	not rated
2011		not rated						not rated	not rated
2010		not rated						not rated	not rated
2009		not rated						not rated	not rated

Small overlap front: Driver-side

TEST DETAILS

Applies to 2009-17 models

Overall evaluation	
Structure and safety cage	
Injury measures	
Head/neck	
Chest	
Hip/thigh	
Lower leg/foot	
Restraints and dummy kinematics	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

The Volkswagen CC was introduced in the 2009 model year. The car is a variant of older (2006-10) models of the Volkswagen Passat sedan with a lower roofline and frameless side windows.

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2016 Volkswagen CC

Structure

The driver space was not maintained well. Maximum intrusion in the driver's footwell area was 24 cm measured at the lower hinge pillar. Maximum intrusion in the instrument panel area was 17 cm.

Injury measures

Measures from the dummy indicate that injuries to the left thigh would be possible in a crash of this severity. The risk of significant injuries to other body regions is low.

Restraints and dummy kinematics

The dummy's head barely contacted the frontal airbag before sliding off the left side as the steering column moved 19 cm to the right, leaving the head vulnerable to contact with forward side structure and resulting in little airbag cushioning for the chest. Additionally, the seat belt allowed excessive forward excursion of the dummy's head and torso. The side curtain airbag did not deploy, leaving the dummy's head vulnerable to contacts with side structure and outside objects. The driver door hinges were torn off and the latch opened, resulting in the door detaching from the vehicle, which shouldn't happen because the driver could be partly or completely ejected from the vehicle.

Tested vehicle specifications

Tested vehicle	2012 Volkswagen CC Lux Plus 4-door
Weight	3,433 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	107 in.
Length	189 in.
Width	73 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	22 mpg city / 31 mpg highway

How this test is conducted**TECHNICAL MEASUREMENTS**

Measures of occupant compartment intrusion on driver side

Test ID	CEN1203
Lower occupant compartment	
Lower hinge pillar max (cm)	24
Footrest (cm)	13
Left toepan (cm)	6
Brake pedal (cm)	3
Parking brake (cm)	0
Rocker panel lateral average (cm)	6
Upper occupant compartment	
Steering column	3
Upper hinge pillar max (cm)	12
Upper dash (cm)	16
Lower instrument panel (cm)	17

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2016 Volkswagen CC








Driver injury measures

Test ID	CEN1203
Head	
HIC-15	131
Peak gs at hard contact	no contact
Neck	
Tension (kN)	1.4
Extension bending moment (Nm)	9
Maximum Nij	0.26
Chest maximum compression (mm)	
	27
Femur (kN)	
Left	6.9
Right	0.3
Knee displacement (mm)	
Left	4
Right	1
Knee-thigh-hip injury risk (%)	
Left	10
Right	0
Maximum tibia index	
Left	0.50
Right	0.35
Tibia axial force (kN)	
Left	2.6
Right	1.6
Foot acceleration (g)	
Left	72
Right	70

Moderate overlap front

TEST DETAILS

Applies to 2009-17 models

Overall evaluation	
Structure and safety cage	
Injury measures	
Head/neck	
Chest	
Leg/foot, left	
Leg/foot, right	
Restraints and dummy kinematics	
	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

This rating applies to vehicles other than the specific model and body style tested.

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2016 Volkswagen CC

The Volkswagen CC was introduced in the 2009 model year. The car remains a variant of older (2006-10) models of the Volkswagen Passat sedan with a lower roofline and frameless side windows. Frontal ratings are based on an earlier Institute test of a 2006 model Passat.

Injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity. Head acceleration from the roof rail/grab handle hit was low.

Restraints and dummy kinematics

Dummy movement was well controlled. During rebound, the dummy's head hit the roof rail and grab handle.

Tested vehicle specifications

Tested vehicle	2006 Volkswagen Passat 2.0T 4-door
Weight	3,434 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	107 in.
Length	188 in.
Width	72 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	22 mpg city / 31 mpg highway

How this test is conducted

TECHNICAL MEASUREMENTS

Measures of occupant compartment intrusion on driver side

Test ID	CEF0529
Footwell intrusion	
Footrest (cm)	4
Left (cm)	6
Center (cm)	6
Right (cm)	5
Brake pedal (cm)	6
Instrument panel rearward movement	
Left (cm)	2
Right (cm)	2
Steering column movement	
Upward (cm)	2
Rearward (cm)	-2
A-pillar rearward movement (cm)	0

Driver injury measures

Test ID	CEF0529
---------	---------

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2016 Volkswagen CC

Head	
HIC-15	161
Peak gs at hard contact	16
Neck	
Tension (kN)	0.8
Extension bending moment (Nm)	28
Maximum Nij	0.29
Chest maximum compression (mm)	26
Legs	
Femur force - left (kN)	0.1
Femur force - right (kN)	1.8
Knee displacement - left (mm)	0
Knee displacement - right (mm)	1
Maximum tibia index - left	0.33
Maximum tibia index - right	0.33
Tibia axial force - left (kN)	1.8
Tibia axial force - right (kN)	3.0
Foot acceleration (g)	
Left	53
Right	125

Side

TEST DETAILS

Applies to 2009-17 models

Overall evaluation	
Structure and safety cage	
Driver injury measures	
Head/neck	
Torso	
Pelvis/leg	
Head protection	
Rear passenger injury measures	
Head/neck	
Torso	
Pelvis/leg	
Head protection	

Side crash test ratings can be compared across vehicle categories.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen CC was introduced in the 2009 model year. The car remains a variant of older (2006-10) models of the Volkswagen Passat sedan with a lower roofline and frameless side windows. Side ratings are assigned by the Institute based on a test conducted by Volkswagen as part of side crash test verification.

4/6/2018

2016 Volkswagen CC

Injury measures

Driver — Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Passenger — Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Head protection

Driver — The dummy's head was protected from being hit by any hard structures, including the intruding barrier, by a side curtain airbag that deployed from the roof and a side airbag that deployed from the seat.

Passenger — The dummy's head was protected from being hit by any hard structures, including the intruding barrier, by a side curtain airbag that deployed from the roof.

Tested vehicle specifications

Tested vehicle	2009 Volkswagen CC 4-door 4wd
Weight	3,327 lbs.
Side airbags	standard front and rear head curtain airbags and standard front seat-mounted torso airbags
Wheelbase	107 in.
Length	189 in.
Width	73 in.
Engine	3.6 L V6
EPA ratings	19 mpg city / 29 mpg highway

How this test is conducted**TECHNICAL MEASUREMENTS****Measures of occupant compartment intrusion on driver side**

Test ID	VTS0801
B-pillar to longitudinal centerline of driver's seat (cm)	-14.5

Negative numbers indicate the amount by which the crush stopped short of the seat centerline.

Driver injury measures

Test ID	VTS0801
Head HIC-15	143
Neck	
Tension (kN)	0.9
Compression (kN)	0.4
Shoulder	
Lateral deflection (mm)	24
Lateral force (kN)	1.1
Torso	
Maximum deflection (mm)	31

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2016 Volkswagen CC


Average deflection (mm)	28
Maximum deflection rate (m/s)	3.49
Maximum viscous criterion (m/s)	0.37
Pelvis	
Iliac force (kN)	2.0
Acetabulum force (kN)	2.3
Combined force (kN)	4.0
Left femur	
L-M force (kN)	0.9
L-M moment (Nm)	144
A-P moment (Nm)	27

Passenger injury measures

Test ID	VTS0801
Head HIC-15	308
Neck	
Tension (kN)	0.2
Compression (kN)	2.3
Shoulder	
Lateral deflection (mm)	33
Lateral force (kN)	1.6
Torso	
Maximum deflection (mm)	39
Average deflection (mm)	31
Maximum deflection rate (m/s)	3.16
Maximum viscous criterion (m/s)	0.57
Pelvis	
Iliac force (kN)	0.7
Acetabulum force (kN)	2.4
Combined force (kN)	3.0
Left femur	
L-M force (kN)	0.4
L-M moment (Nm)	19
A-P moment (Nm)	86

Roof strength**TEST DETAILS**

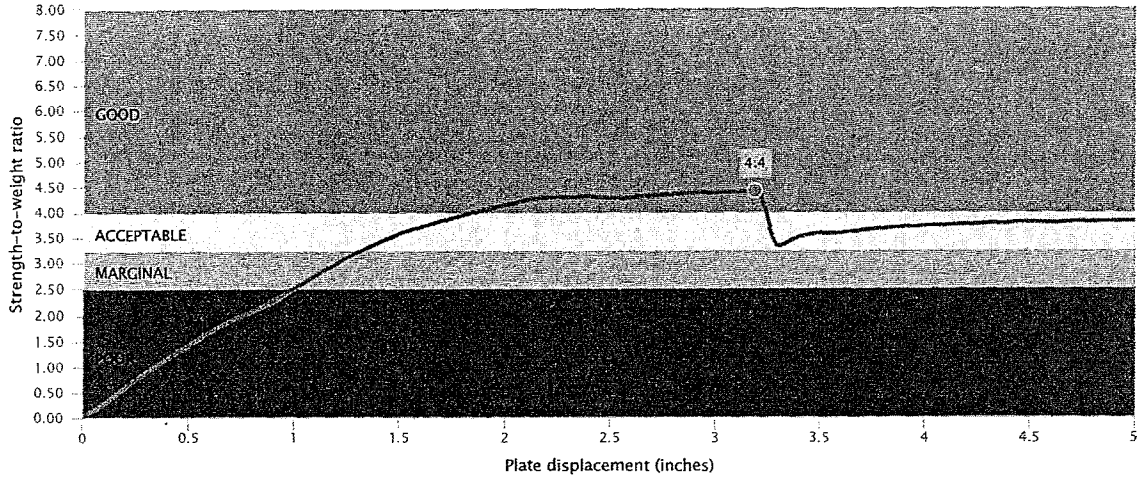
Applies to 2009-17 models

Overall evaluation	
Curb weight	3,419 lbs
Peak force	15,057 lbs
Strength-to-weight ratio	4.40
Tested vehicle	2011 Volkswagen CC Lt Limited 4-door
Rating does not apply to 4-wheel drive V6 model. Rating of this model is Acceptable.	

Roof strength test ratings can be compared across vehicle categories.

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2016 Volkswagen CC



In the test, the strength of the roof is determined by pushing a metal plate against one side of it at a slow but constant speed. The force applied relative to the vehicle's weight is known as the strength-to-weight ratio. This graph shows how the ratio varied as the test of this vehicle progressed. The peak strength-to-weight ratio recorded at any time before the roof is crushed 5 inches is the key measurement of roof strength.

A good rating requires a strength-to-weight ratio of at least 4. In other words, the roof must withstand a force of at least 4 times the vehicle's weight before the plate crushes the roof by 5 inches. For an acceptable rating, the minimum required strength-to-weight ratio is 3.25. For a marginal rating, it is 2.5. Anything lower than that is poor.

How this test is conducted

Head restraints & seats Power seats

TEST DETAILS

Applies to 2009-17 models

Overall evaluation	
Dynamic rating	
Seat/head restraint geometry	

Important: Ratings for head restraints & seats should be compared only among vehicles of similar weight.

Seat type

Power seats

How this test is conducted

4/6/2018

2016 Volkswagen CC

TECHNICAL MEASUREMENTS

Seat type	Power seat
Geometry	
Backset (mm)	24
Distance below top of head (mm)	-6
Seat design parameters	
Pass/fail	Pass
Max T1 acceleration (g)	15.2
Head contact time (ms)	60
Force rating	1
Neck forces	
Max neck shear force (N)	11
Max neck tension (N)	574

Front crash prevention

DETAILS

Applies to 2016 models

System details

- optional Front Assist (with Autonomous Emergency Braking)

Package name

- optional Driver Assistance Package

Overall evaluation

FCW NOT
QUALIFIED
autobrake
not tested
0 points total

Forward collision warning

This system does not meet the National Highway Traffic Safety Administration's criteria for forward collision warning. 0 points

Low-speed autobrake

Autobrake not tested. 0 points

High-speed autobrake

Autobrake not tested. 0 points

How this rating is determined

4/6/2018

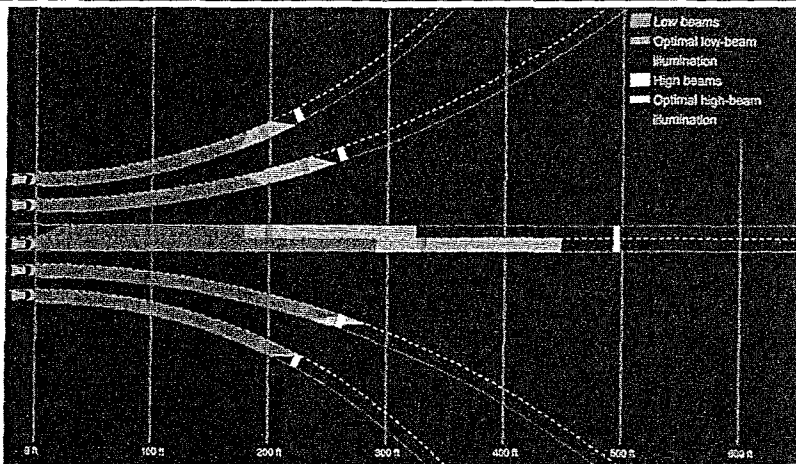
2016 Volkswagen CC

Headlights

TEST DETAILS

Trim level(s)	2.0 Sport trim 2.0 R-Line base trim 2.0 R-Line Executive trim 2.0 R-Line Executive w/ Carbon trim 3.6L V4 4Motion Executive trim
Low-beam headlight type	HID projector
High-beam headlight type	HID projector
Curve-adaptive?	Yes
Automatically switches between low beams and high beams (high-beam assist)?	No
Overall rating	A

Distance at which headlights provide at least 5 lux illumination:



Low beams

On the straightaway, visibility was fair on both sides of the road. On curves, visibility was good on both right curves and fair on both left curves.

The low beams never exceeded glare limits.

High beams

On the straightaway, visibility was fair on the right side of the road and inadequate on the left side. On curves, visibility was good on the gradual right curve and fair on the sharp right and both left curves.

How this test is conducted

TECHNICAL MEASUREMENTS

Trim level(s)	2.0 Sport trim
---------------	----------------

4/6/2018

2016 Volkswagen CC

2.0 R-Line base trim
 2.0 R-Line Executive trim
 2.0 R-Line Executive w/ Carbon trim
 3.6L V4 4Motion Executive trim

Low-beam headlight type	HID projector
High-beam headlight type	HID projector
Curve-adaptive?	Yes
High-beam assist?	No
Overall rating	A
Applies to 2016-17 models	

LOW BEAMS	Average minimum useful illumination distance (5 lux)	Amount glare exceeded threshold
Straightaway right edge	88.7 m	None
Straightaway left edge	54.7 m	None
250m radius right curve, right edge	73.7 m	None
250m radius left curve, left edge	55.0 m	None
150m radius right curve, right edge	63.8 m	None
150m radius left curve, right edge	53.6 m	None

HIGH BEAMS	Average minimum useful illumination distance (5 lux)
Straightaway right edge	136.4 m
Straightaway left edge	98.8 m
250m radius right curve, right edge	78.5 m
250m radius left curve, left edge	72.8 m
150m radius right curve, right edge	64.5 m
150m radius left curve, left edge	63.5 m

Child seat anchors (LATCH) ease of use Sport — leatherette seats

DETAILS

Applies to 2016-17 models

Overall evaluation **A**

How this rating is determined

Vehicle trim	Sport
Seat type	leatherette

This vehicle has 2 rear seating positions with complete child seat attachment (LATCH) hardware.

It has 1 additional seating position with a tether anchor only.

4/6/2018

2016 Volkswagen CC



Good
Acceptable
Marginal
Poor
<input type="checkbox"/> Seating positions that rely on borrowed lower anchors or have only a tether anchor available are not rated.
Tether anchor
Lower anchors
Lower anchor(s) can be borrowed from adjacent position(s)
No hardware available

Details by seating position

1	Tether anchor
	easy-to-find location
	no other hardware could be confused for anchor
	Lower anchors
	too deep in seat
	too much force needed to attach
	easy to maneuver around anchors
2	Tether anchor
	easy-to-find location
	no other hardware could be confused for anchor
	Lower anchors
	none available
3	Tether anchor
	easy-to-find location
	no other hardware could be confused for anchor
	Lower anchors
	too deep in seat
	too much force needed to attach
	easy to maneuver around anchors

TECHNICAL MEASUREMENTS

Seat position 21 **3**

Lower anchor A
Open access rated
No

4/6/2018

2016 Volkswagen CC

Depth (cm)	2-4
Force (lbs)	52
Clearance angle (degrees)	73
Lower anchor B	
Open access rated	No
Depth (cm)	2-4
Force (lbs)	43
Clearance angle (degrees)	91
Tether anchor	
Location	Rear deck
Confusing hardware present	No
Has contrasting label within 3 inches of tether anchor	No

Seat position 22 **2**

Lower anchor A	
No lower latch for this seat position	
Lower anchor B	
No lower latch for this seat position	
Tether anchor	
Location	Rear deck
Confusing hardware present	No
Has contrasting label within 3 inches of tether anchor	No

Seat position 23 **1**

Lower anchor A	
Open access rated	No
Depth (cm)	0-2
Force (lbs)	43
Clearance angle (degrees)	86
Lower anchor B	
Open access rated	No
Depth (cm)	2-4
Force (lbs)	51
Clearance angle (degrees)	57
Tether anchor	
Location	Rear deck
Confusing hardware present	No
Has contrasting label within 3 inches of tether anchor	No


Other safety features

Side airbags: front and rear head curtain airbags and front seat-mounted torso airbags (standard); rear seat-mounted torso airbags (optional)

Electronic stability control

4/6/2018

2016 Volkswagen CC

Antilock brakes

Daytime running lights

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4/6/2018

2016 Volkswagen Golf



2016 TOP SAFETY PICK+

2016 Volkswagen Golf

Small car



2016 Volkswagen Golf

CRASHWORTHINESS

Small overlap front

Driver-side



Passenger-side



Moderate overlap front



Side



Roof strength



Head restraints & seats



CRASH AVOIDANCE & MITIGATION

Front crash prevention




ADVANCED

with optional equipment

CHILD SEAT ANCHORS (LATCH)
EASE OF USE



Check for NHTSA recalls 

The photos and videos shown here may be of a different model, model year or body type from the one selected. The ratings of one vehicle often apply to other models if they are built on the same platform. In addition, a test of a vehicle from one model year may apply to earlier or later model years if the vehicle hasn't been significantly redesigned.

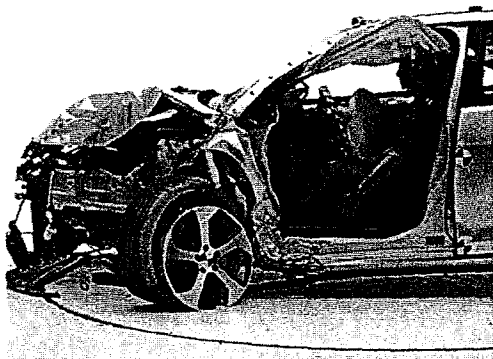
4/6/2018

2016 Volkswagen Golf



Small overlap front: — Driver-side —

Action shot taken during the driver-side small overlap frontal crash test.



Small overlap front: — Driver-side —

The dummy's position in relation to the door frame, steering wheel, and instrument panel after the crash test indicates that the driver's survival space was maintained well.



Small overlap front: — Driver-side —

During the crash, the dummy's head contacted the frontal airbag but then nearly slid off the left side. The seat belt allowed the dummy to move too far forward, as is evident from the gap between the seat back and the dummy's torso.

4/6/2018

2016 Volkswagen Golf



Small overlap front: — Driver-side —

Intrusion into the driver's space was minimal, and risk of injuries to the dummy's legs and feet was low.



2015 Volkswagen GTI driver-side small overlap test

Applies to 2015-18 models

Other model years

4/6/2018

2016 Volkswagen Golf

Model year	Small overlap front		Moderate overlap front	Side	Roof strength	Head restraints & seats	Front crash prevention	Headlights	LATCH ease of use
	Driver	Passenger							
2018							 BASIC autobrake not tested	not rated	
2017							 ADVANCED		
2016							 ADVANCED	not rated	
2015							 BASIC	not rated	not rated
2014	not rated	not rated					 NOT AVAILABLE	not rated	not rated
2013	not rated	not rated					 NOT AVAILABLE	not rated	not rated
2012	not rated	not rated						not rated	not rated
2011	not rated	not rated						not rated	not rated
2010	not rated	not rated						not rated	not rated
2006	not rated	not rated		not rated	not rated	not rated		not rated	not rated
2005	not rated	not rated		not rated	not rated	not rated		not rated	not rated
2004	not rated	not rated		not rated	not rated	not rated		not rated	not rated
2003	not rated	not rated		not rated	not rated	not rated		not rated	not rated
2002	not rated	not rated		not rated	not rated	not rated		not rated	not rated
2001	not rated	not rated		not rated	not rated	not rated		not rated	not rated
2000	not rated	not rated		not rated	not rated	not rated		not rated	not rated
1999	not rated	not rated		not rated	not rated	not rated		not rated	not rated
1998	not rated	not rated		not rated	not rated	not rated		not rated	not rated
1997	not rated	not rated		not rated	not rated	not rated		not rated	not rated
1996	not rated	not rated		not rated	not rated	not rated		not rated	not rated
1995	not rated	not rated		not rated	not rated	not rated		not rated	not rated
1994	not rated	not rated		not rated	not rated	not rated		not rated	not rated

4/6/2018

2016 Volkswagen Golf

Small overlap front: Driver-side

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Structure and safety cage	
Injury measures	
Head/neck	
Chest	
Hip/thigh	
Lower leg/foot	
Restraints and dummy kinematics	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. The small overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Structure

The driver space was maintained well, with maximum intrusion of the lower interior of 10 cm at the lower hinge pillar. Upper interior intrusion measured 6-7 cm at the hinge pillar and instrument panel.

Injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Restraints and dummy kinematics

The dummy's head contacted the frontal airbag but nearly slid off the left side, leaving the head vulnerable to contact with forward structure. Additionally, the seat belt allowed excessive forward excursion of the dummy's head and torso. The side curtain airbag deployed and had sufficient forward coverage to protect the head from contact with side structure and outside objects.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,196 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

4/6/2018

2016 Volkswagen Golf

How this test is conducted**TECHNICAL MEASUREMENTS**

Measures of occupant compartment intrusion on driver side

Test ID	CEN1422
Lower occupant compartment	
Lower hinge pillar max (cm)	10
Footrest (cm)	7
Left toepan (cm)	3
Brake pedal (cm)	1
Parking brake (cm)	
Rocker panel lateral average (cm)	1
Upper occupant compartment	
Steering column	3
Upper hinge pillar max (cm)	6
Upper dash (cm)	7
Lower instrument panel (cm)	6

Driver injury measures

Test ID	CEN1422
Head	
HIC-15	243
Peak gs at hard contact	no contact
Neck	
Tension (kN)	1.7
Extension bending moment (Nm)	17
Maximum Nij	0.31
Chest maximum compression (mm)	
	24
Femur (kN)	
Left	1.1
Right	0.1
Knee displacement (mm)	
Left	1
Right	0
Knee-thigh-hip injury risk (%)	
Left	0
Right	0
Maximum tibia index	
Left	0.55
Right	0.53
Tibia axial force (kN)	
Left	3.1
Right	0.7
Foot acceleration (g)	
Left	75
Right	38











4/6/2018

2016 Volkswagen Golf

Small overlap front: Passenger-side

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	A
Structure and safety cage	A
Passenger injury measures	
Head/neck	
Chest	
Hip/thigh	
Lower leg/foot	
Passenger restraints and dummy kinematics	
Driver injury measures	
Head/neck	
Chest	
Hip/thigh	
Lower leg/foot	
Driver restraints and dummy kinematics	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Passenger-side small overlap frontal ratings are assigned by the institute based on a test conducted by Volkswagen as part of **frontal crash test verification**.

The passenger-side small overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Structure

The passenger space was maintained reasonably well, with maximum intrusion of the lower interior of 13 cm at the lower hinge pillar. Maximum upper interior intrusion measured 12 cm at the dashboard and 11 cm at the hinge pillar.

Passenger injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Passenger restraints and dummy kinematics

The dummy's head barely contacted the frontal airbag before sliding off the right side, leaving the head vulnerable to contact with forward structure. The side curtain airbag deployed and has sufficient forward coverage to protect the head from contact with side structure and outside objects.

Driver injury measures

4/6/2018

2016 Volkswagen Golf

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Driver restraints and dummy kinematics

The dummy's movement was well controlled. The dummy's head loaded the frontal airbag, which stayed in front of the dummy until rebound.

Tested vehicle specifications

Tested vehicle	2016 Volkswagen GTI 4-door
Weight	3,150 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 34 mpg highway

How this test is conducted

TECHNICAL MEASUREMENTS

Measures of occupant compartment intrusion on passenger side

Test ID	VTP1725
Lower occupant compartment	
Lower hinge pillar max (cm)	13
Footrest (cm)	9
Right toepan (cm)	5
Center toepan (cm)	3
Rocker panel lateral average (cm)	2
Upper occupant compartment	
Center dash (cm)	9
Upper hinge pillar max (cm)	11
Upper dash (cm)	12
Right lower dash (cm)	11

Passenger injury measures

Test ID	VTP1725
Head	
HIC-15	165
Peak gs at hard contact	no contact
Neck	
Tension (kN)	1.5
Extension bending moment (Nm)	15
Maximum Nij	0.27
Chest maximum compression (mm)	26

4/6/2018

2016 Volkswagen Golf

Femur (kN)	
Left	0.2
Right	3.9
Knee displacement (mm)	
Left	0
Right	4
Knee-thigh-hip injury risk (%)	
Left	0
Right	0
Maximum tibia index	
Left	0.49
Right	0.29
Tibia axial force (kN)	
Left	2.2
Right	1.7
Foot acceleration (g)	
Left	65
Right	65

Driver injury measures

Test ID	VTP1725
Head	
HIC-15	159
Peak gs at hard contact	no contact
Neck	
Tension (kN)	0.8
Extension bending moment (Nm)	29
Maximum Nij	0.19
Chest maximum compression (mm)	33
Femur (kN)	
Left	0.1
Right	0.4
Knee displacement (mm)	
Left	0
Right	1
Knee-thigh-hip injury risk (%)	
Left	0
Right	0
Maximum tibia index	
Left	0.35
Right	0.25
Tibia axial force (kN)	
Left	0.5
Right	1.2
Foot acceleration (g)	
Left	48
Right	44








4/6/2018

2016 Volkswagen Golf

Moderate overlap front

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Structure and safety cage	
Injury measures	
Head/neck	
Chest	
Leg/foot, left	
Leg/foot, right	
Restraints and dummy kinematics	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Moderate overlap frontal ratings are assigned by the Institute based on a test conducted by Volkswagen as part of [frontal crash test verification](#).

The moderate overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Injury measures

Measures taken from the head, neck, and chest indicate low risk of injuries to these body regions in a crash of this severity. Forces on the right tibia indicate that lower leg injuries would be possible. Head accelerations from the roof rail and B-pillar hits were low.

Restraints and dummy kinematics

Dummy movement was well controlled. During rebound, the dummy's head hit the roof rail and B-pillar.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,095 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

How this test is conducted

4/6/2018

2016 Volkswagen Golf

TECHNICAL MEASUREMENTS

Measures of occupant compartment intrusion on driver side

Test ID	VTF1401
Footwell intrusion	
Footrest (cm)	3
Left (cm)	4
Center (cm)	2
Right (cm)	1
Brake pedal (cm)	2
Instrument panel rearward movement	
Left (cm)	0
Right (cm)	0
Steering column movement	
Upward (cm)	-2
Rearward (cm)	-7
A-pillar rearward movement (cm)	0

Driver injury measures

Test ID	VTF1401
Head	
HIC-15	301
Peak gs at hard contact	26
Neck	
Tension (kN)	1.9
Extension bending moment (Nm)	43
Maximum Nij	0.33
Chest maximum compression (mm)	33
Legs	
Femur force - left (kN)	0.2
Femur force - right (kN)	0.3
Knee displacement - left (mm)	0
Knee displacement - right (mm)	0
Maximum tibia index - left	0.37
Maximum tibia index - right	0.98
Tibia axial force - left (kN)	2.7
Tibia axial force - right (kN)	1.9
Foot acceleration (g)	
Left	95
Right	82

**Side****TEST DETAILS**

Applies to 2015-18 models

4/6/2018

2016 Volkswagen Golf

Overall evaluation	
Structure and safety cage	
Driver injury measures	
Head/neck	
Torso	
Pelvis/leg	
Head protection	
Rear passenger injury measures	
Head/neck	
Torso	
Pelvis/leg	
Head protection	

Side crash test ratings can be compared across vehicle categories.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Side ratings are assigned by the Institute based on a test conducted by Volkswagen as part of side crash test verification.

The side crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Injury measures

Driver — Measures taken from the dummy indicate a left femur fracture would be possible in a crash of this severity. The risk of significant injuries to other body regions is low.

Passenger — Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Head protection

Driver — The dummy's head was protected from being hit by any hard structures, including the intruding barrier, by a side curtain airbag that deployed from the roof.

Passenger — The dummy's head was protected from being hit by any hard structures, including the intruding barrier, by a side curtain airbag that deployed from the roof.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,115 lbs.
Side airbags	standard front and rear head curtain airbags and standard front seat-mounted torso airbags
Wheelbase	104 in.

4/6/2018

2016 Volkswagen Golf

Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

How this test is conducted**TECHNICAL MEASUREMENTS**

Measures of occupant compartment intrusion on driver side

Test ID	VTS1402
B-pillar to longitudinal centerline of driver's seat (cm)	-22.0

Negative numbers indicate the amount by which the crush stopped short of the seat centerline.

Driver injury measures

Test ID	VTS1402
Head HIC-15	154
Neck	
Tension (kN)	1.0
Compression (kN)	0.5
Shoulder	
Lateral deflection (mm)	43
Lateral force (kN)	1.2
Torso	
Maximum deflection (mm)	34
Average deflection (mm)	32
Maximum deflection rate (m/s)	2.67
Maximum viscous criterion (m/s)	0.40
Pelvis	
Iliac force (kN)	2.1
Acetabulum force (kN)	1.7
Combined force (kN)	3.6
Left femur	
L-M force (kN)	0.8
L-M moment (Nm)	266
A-P moment (Nm)	41

Passenger injury measures

Test ID	VTS1402
Head HIC-15	112
Neck	
Tension (kN)	0.3
Compression (kN)	0.1
Shoulder	
Lateral deflection (mm)	43
Lateral force (kN)	1.5
Torso	

4/6/2018


2016 Volkswagen Golf

Maximum deflection (mm)	37
Average deflection (mm)	31
Maximum deflection rate (m/s)	3.47
Maximum viscous criterion (m/s)	0.44
Pelvis	
Iliac force (kN)	0.3
Acetabulum force (kN)	2.8
Combined force (kN)	2.8
Left femur	
L-M force (kN)	1.0
L-M moment (Nm)	65
A-P moment (Nm)	28

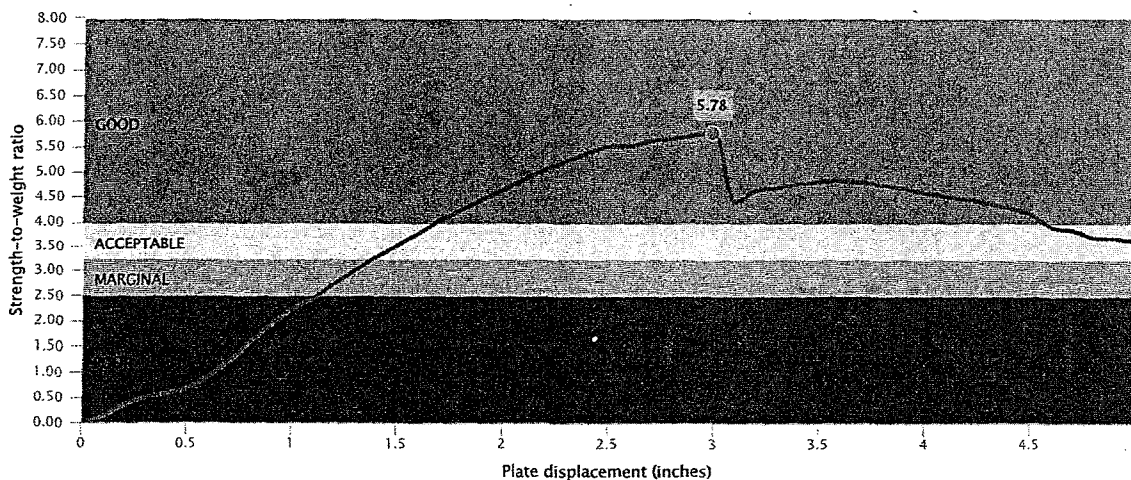
Roof strength

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Curb weight	3,166 lbs
Peak force	18,303 lbs
Strength-to-weight ratio	5.78
Tested vehicle	2015 Volkswagen GTI 4-door
Rating applies to the GTI 4-door (tested), Golf 4-door, and the structurally similar Golf SportWagen and Golf Alltrack.	

Roof strength test ratings can be compared across vehicle categories.



In the test, the strength of the roof is determined by pushing a metal plate against one side of it at a slow but constant speed. The force applied relative to the vehicle's weight is known as the strength-to-weight ratio. This graph shows how the ratio varied as the test of this vehicle progressed. The peak strength-to-weight ratio recorded at any time before the roof is crushed 5 inches is the key measurement of roof strength.

4/6/2018

2016 Volkswagen Golf

A good rating requires a strength-to-weight ratio of at least 4. In other words, the roof must withstand a force of at least 4 times the vehicle's weight before the plate crushes the roof by 5 inches. For an acceptable rating, the minimum required strength-to-weight ratio is 3.25. For a marginal rating, it is 2.5. Anything lower than that is poor.

How this test is conducted

Head restraints & seats Power leather seat

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Dynamic rating	
Seat/head restraint geometry	

Important: Ratings for head restraints & seats should be compared only among vehicles of similar weight.

Seat type

Power leather seat

How this test is conducted

TECHNICAL MEASUREMENTS

Seat type	Power leather seat
Geometry	
Backset (mm)	29
Distance below top of head (mm)	12
Seat design parameters	
Pass/fail	Pass
Max T1 acceleration (g)	15.1
Head contact time (ms)	60
Force rating	1
Neck forces	
Max neck shear force (N)	6
Max neck tension (N)	397

Front crash prevention

DETAILS

Applies to 2016-17 models

4/6/2018

2016 Volkswagen Golf

System details

- optional Front Assist (with Autonomous Emergency Braking)

Package name

- optional Driver Assistance Package

Overall evaluation


ADVANCED
 with optional
 equipment
 3 points total

Forward collision warning

This system meets the National Highway Traffic Safety Administration's criteria for forward collision warning. 1 point

Low-speed autobrake

In the 12 mph IIHS test, impact speed was reduced by 10 mph. 2 points

High-speed autobrake

In the 25 mph IIHS test, impact speed was reduced by 1 mph. 0 points

How this rating is determined

Child seat anchors (LATCH) ease of use SE TSI — leather seats

DETAILS

Applies to 2016-18 models

Overall evaluation 

How this rating is determined

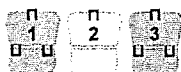
Vehicle trim	SE TSI
Seat type	leather

This vehicle has 2 rear seating positions with complete child seat attachment (LATCH) hardware.

It has 1 additional seating position with a tether anchor only.

4/6/2018

2016 Volkswagen Golf



Good
Acceptable
Marginal
Poor
<input type="checkbox"/> Seating positions that rely on borrowed lower anchors or have only a tether anchor available are not rated.
Tether anchor
Lower anchors
Lower anchor(s) can be borrowed from adjacent position(s)
No hardware available

Details by seating position

1	Tether anchor
	easy-to-find location
	no other hardware could be confused for anchor
	Lower anchors
	not too deep in seat
	not too much force needed to attach
	difficult to maneuver around anchors
2	Tether anchor
	easy-to-find location
	other hardware could be confused for anchor
	Lower anchors
	none available
3	Tether anchor
	easy-to-find location
	no other hardware could be confused for anchor
	Lower anchors
	not too deep in seat
	not too much force needed to attach
	difficult to maneuver around anchors

TECHNICAL MEASUREMENTS

Seat position 21 **3**

Lower anchor A	
Open access rated	Yes

4/6/2018

2016 Volkswagen Golf

Depth	Visible
Force (lbs)	0
Clearance angle (degrees)	0
Lower anchor B	
Open access rated	Yes
Depth	Visible
Force (lbs)	0
Clearance angle (degrees)	0
Tether anchor	
Location	Middle seatback
Confusing hardware present	Yes
Has contrasting label within 3 inches of tether anchor	Yes

Seat position 22 **2**

Lower anchor A	
No lower latch for this seat position	
Lower anchor B	
No lower latch for this seat position	
Tether anchor	
Location	Middle seatback
Confusing hardware present	Yes
Has contrasting label within 3 inches of tether anchor	No

Seat position 23 **1**

Lower anchor A	
Open access rated	Yes
Depth	Visible
Force (lbs)	0
Clearance angle (degrees)	0
Lower anchor B	
Open access rated	Yes
Depth	Visible
Force (lbs)	0
Clearance angle (degrees)	0
Tether anchor	
Location	Middle seatback
Confusing hardware present	Yes
Has contrasting label within 3 inches of tether anchor	Yes

Other safety features

Side airbags: front and rear head curtain airbags and front seat-mounted torso airbags

Rollover sensor: designed to deploy the side curtain airbags in the event of an impending rollover (beginning with 2016 models built after June 2015)

4/6/2018

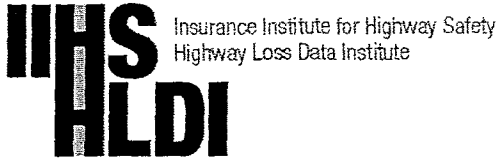
2016 Volkswagen Golf

Electronic stability control
Antilock brakes
Daytime running lights

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4/6/2018

2016 Volkswagen Golf SportWagen



2016 TOP SAFETY PICK+

2016 Volkswagen Golf SportWagen

Small car



2016 Volkswagen Golf SportWagen

CRASHWORTHINESS

Small overlap front

Driver-side



Passenger-side



Moderate overlap front



Side



Roof strength



Head restraints & seats



CRASH AVOIDANCE & MITIGATION

Front crash prevention



ADVANCED
with optional
equipment

**CHILD SEAT ANCHORS (LATCH)
EASE OF USE**

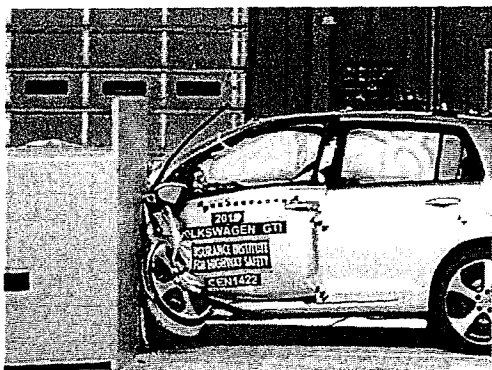


Check for NHTSA recalls

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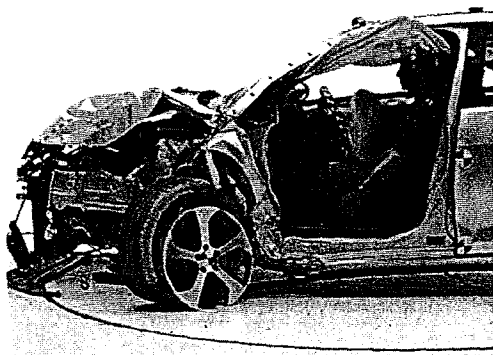
4/6/2018

2016 Volkswagen Golf SportWagen



Small overlap front: — Driver-side —

Action shot taken during the driver-side small overlap frontal crash test.



Small overlap front: — Driver-side —

The dummy's position in relation to the door frame, steering wheel, and instrument panel after the crash test indicates that the driver's survival space was maintained well.



Small overlap front: — Driver-side —

During the crash, the dummy's head contacted the frontal airbag but then nearly slid off the left side. The seat belt allowed the dummy to move too far forward, as is evident from the gap between the seat back and the dummy's torso.

4/6/2018

2016 Volkswagen Golf SportWagen



Small overlap front: — Driver-side —

Intrusion into the driver's space was minimal, and risk of injuries to the dummy's legs and feet was low.



2015 Volkswagen GTI driver-side small overlap test

Applies to 2015-18 models

Other model years

Model year	Small overlap front		Moderate overlap front	Side	Roof strength	Head restraints & seats	Front crash prevention	Headlights	LATCH ease of use
	Driver	Passenger							
2018							 BASIC autobrake not tested	not rated	
2017							 ADVANCED		
2016							 ADVANCED	not rated	
2015							 BASIC	not rated	not rated

Small overlap front: Driver-side





TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Structure and safety cage	
Injury measures	

4/6/2018

2016 Volkswagen Golf SportWagen

Head/neck	
Chest	
Hip/thigh	
Lower leg/foot	
Restraints and dummy kinematics	A

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. The small overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Structure

The driver space was maintained well, with maximum intrusion of the lower interior of 10 cm at the lower hinge pillar. Upper interior intrusion measured 6-7 cm at the hinge pillar and instrument panel.

Injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Restraints and dummy kinematics

The dummy's head contacted the frontal airbag but nearly slid off the left side, leaving the head vulnerable to contact with forward structure. Additionally, the seat belt allowed excessive forward excursion of the dummy's head and torso. The side curtain airbag deployed and had sufficient forward coverage to protect the head from contact with side structure and outside objects.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,196 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

How this test is conducted

TECHNICAL MEASUREMENTS

Measures of occupant compartment intrusion on driver side

Test ID	CEN1422
Lower occupant compartment	

4/6/2018

2016 Volkswagen Golf SportWagen

Lower hinge pillar max (cm)	10
Footrest (cm)	7
Left toepan (cm)	3
Brake pedal (cm)	1
Parking brake (cm)	
Rocker panel lateral average (cm)	1
Upper occupant compartment	
Steering column	3
Upper hinge pillar max (cm)	6
Upper dash (cm)	7
Lower instrument panel (cm)	6

Driver injury measures

Test ID	CEN1422
Head	
HIC-15	243
Peak gs at hard contact	no contact
Neck	
Tension (kN)	1.7
Extension bending moment (Nm)	17
Maximum Nij	0.31
Chest maximum compression (mm)	24
Femur (kN)	
Left	1.1
Right	0.1
Knee displacement (mm)	
Left	1
Right	0
Knee-thigh-hip injury risk (%)	
Left	0
Right	0
Maximum tibia index	
Left	0.55
Right	0.53
Tibia axial force (kN)	
Left	3.1
Right	0.7
Foot acceleration (g)	
Left	75
Right	38

Small overlap front: Passenger-side**TEST DETAILS**

Applies to 2015-18 models

Overall evaluation

A

4/6/2018

2016 Volkswagen Golf SportWagen

Structure and safety cage	A
Passenger injury measures	
Head/neck	5
Chest	5
Hip/thigh	5
Lower leg/foot	5
Passenger restraints and dummy kinematics	M
Driver injury measures	
Head/neck	5
Chest	5
Hip/thigh	5
Lower leg/foot	5
Driver restraints and dummy kinematics	5

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Passenger-side small overlap frontal ratings are assigned by the Institute based on a test conducted by Volkswagen as part of **frontal crash test verification**.

The passenger-side small overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Structure

The passenger space was maintained reasonably well, with maximum intrusion of the lower interior of 13 cm at the lower hinge pillar. Maximum upper interior intrusion measured 12 cm at the dashboard and 11 cm at the hinge pillar.

Passenger injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Passenger restraints and dummy kinematics

The dummy's head barely contacted the frontal airbag before sliding off the right side, leaving the head vulnerable to contact with forward structure. The side curtain airbag deployed and has sufficient forward coverage to protect the head from contact with side structure and outside objects.

Driver injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Driver restraints and dummy kinematics

The dummy's movement was well controlled. The dummy's head loaded the frontal airbag, which stayed in front of the dummy until rebound.

4/6/2018

2016 Volkswagen Golf SportWagen

Tested vehicle specifications

Tested vehicle	2016 Volkswagen GTI 4-door
Weight	3,150 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 34 mpg highway

How this test is conducted**TECHNICAL MEASUREMENTS**

Measures of occupant compartment intrusion on passenger side

Test ID	VTP1725
Lower occupant compartment	
Lower hinge pillar max (cm)	13
Footrest (cm)	9
Right toepan (cm)	5
Center toepan (cm)	3
Rocker panel lateral average (cm)	2
Upper occupant compartment	
Center dash (cm)	9
Upper hinge pillar max (cm)	11
Upper dash (cm)	12
Right lower dash (cm)	11

Passenger injury measures

Test ID	VTP1725
Head	
HIC-15	165
Peak gs at hard contact	no contact
Neck	
Tension (kN)	1.5
Extension bending moment (Nm)	15
Maximum Nij	0.27
Chest maximum compression (mm)	26
Femur (kN)	
Left	0.2
Right	3.9
Knee displacement (mm)	
Left	0
Right	4
Knee-thigh-hip injury risk (%)	

4/6/2018

2016 Volkswagen Golf SportWagen

Left	0
Right	0
Maximum tibia index	
Left	0.49
Right	0.29
Tibia axial force (kN)	
Left	2.2
Right	1.7
Foot acceleration (g)	
Left	65
Right	65

Driver injury measures

Test ID	VTP1725
Head	
HIC-15	159
Peak gs at hard contact	no contact
Neck	
Tension (kN)	0.8
Extension bending moment (Nm)	29
Maximum Nij	0.19
Chest maximum compression (mm)	
	33
Femur (kN)	
Left	0.1
Right	0.4
Knee displacement (mm)	
Left	0
Right	1
Knee-thigh-hip injury risk (%)	
Left	0
Right	0
Maximum tibia index	
Left	0.35
Right	0.25
Tibia axial force (kN)	
Left	0.5
Right	1.2
Foot acceleration (g)	
Left	48
Right	44

Moderate overlap front

TEST DETAILS

Applies to 2015-18 models

Overall evaluation



4/6/2018

2016 Volkswagen Golf SportWagen

Structure and safety cage	
Injury measures	
Head/neck	
Chest	
Leg/foot, left	
Leg/foot, right	
Restraints and dummy kinematics	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Moderate overlap frontal ratings are assigned by the Institute based on a test conducted by Volkswagen as part of frontal crash test verification.

The moderate overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Injury measures

Measures taken from the head, neck, and chest indicate low risk of injuries to these body regions in a crash of this severity. Forces on the right tibia indicate that lower leg injuries would be possible. Head accelerations from the roof rail and B-pillar hits were low.

Restraints and dummy kinematics

Dummy movement was well controlled. During rebound, the dummy's head hit the roof rail and B-pillar.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,095 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

How this test is conducted

TECHNICAL MEASUREMENTS

Measures of occupant compartment intrusion on driver side

Test ID	VTF1401
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4/6/2018

2016 Volkswagen Golf SportWagen

Footwell intrusion	
Footrest (cm)	3
Left (cm)	4
Center (cm)	2
Right (cm)	1
Brake pedal (cm)	2
Instrument panel rearward movement	
Left (cm)	0
Right (cm)	0
Steering column movement	
Upward (cm)	-2
Rearward (cm)	-7
A-pillar rearward movement (cm)	0





Driver injury measures

Test ID	VTF1401
Head	
HIC-15	301
Peak gs at hard contact	26
Neck	
Tension (kN)	1.9
Extension bending moment (Nm)	43
Maximum Nij	0.33
Chest maximum compression (mm)	33
Legs	
Femur force - left (kN)	0.2
Femur force - right (kN)	0.3
Knee displacement - left (mm)	0
Knee displacement - right (mm)	0
Maximum tibia index - left	0.37
Maximum tibia index - right	0.98
Tibia axial force - left (kN)	2.7
Tibia axial force - right (kN)	1.9
Foot acceleration (g)	
Left	95
Right	82

Side






TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Structure and safety cage	
Driver injury measures	
Head/neck	
Torso	

4/6/2018

2016 Volkswagen Golf SportWagen

Pelvis/leg	A
Head protection	
Rear passenger injury measures	
Head/neck	
Torso	
Pelvis/leg	
Head protection	

Side crash test ratings can be compared across vehicle categories.

This rating applies to vehicles other than the specific model and body style tested.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Side ratings are assigned by the Institute based on a test conducted by Volkswagen as part of side crash test verification.

The side crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Injury measures

Driver — Measures taken from the dummy indicate a left femur fracture would be possible in a crash of this severity. The risk of significant injuries to other body regions is low.

Passenger — Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Head protection

Driver — The dummy's head was protected from being hit by any hard structures, including the intruding barrier, by a side curtain airbag that deployed from the roof.

Passenger — The dummy's head was protected from being hit by any hard structures, including the intruding barrier, by a side curtain airbag that deployed from the roof.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,115 lbs.
Side airbags	standard front and rear head curtain airbags and standard front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

4/6/2018

2016 Volkswagen Golf SportWagen

How this test is conducted**TECHNICAL MEASUREMENTS**

Measures of occupant compartment intrusion on driver side

Test ID	VTS1402
B-pillar to longitudinal centerline of driver's seat (cm)	-22.0
Negative numbers indicate the amount by which the crush stopped short of the seat centerline.	

Driver injury measures

Test ID	VTS1402
Head HIC-15	154
Neck	
Tension (kN)	1.0
Compression (kN)	0.5
Shoulder	
Lateral deflection (mm)	43
Lateral force (kN)	1.2
Torso	
Maximum deflection (mm)	34
Average deflection (mm)	32
Maximum deflection rate (m/s)	2.67
Maximum viscous criterion (m/s)	0.40
Pelvis	
Iliac force (kN)	2.1
Acetabulum force (kN)	1.7
Combined force (kN)	3.6
Left femur	
L-M force (kN)	0.8
L-M moment (Nm)	266
A-P moment (Nm)	41

Passenger injury measures

Test ID	VTS1402
Head HIC-15	112
Neck	
Tension (kN)	0.3
Compression (kN)	0.1
Shoulder	
Lateral deflection (mm)	43
Lateral force (kN)	1.5
Torso	
Maximum deflection (mm)	37
Average deflection (mm)	31
Maximum deflection rate (m/s)	3.47
Maximum viscous criterion (m/s)	0.44
Pelvis	

4/6/2018

2016 Volkswagen Golf SportWagen

Iliac force (kN)	0.3
Acetabulum force (kN)	2.8
Combined force (kN)	2.8
Left femur	
L-M force (kN)	1.0
L-M moment (Nm)	65
A-P moment (Nm)	28

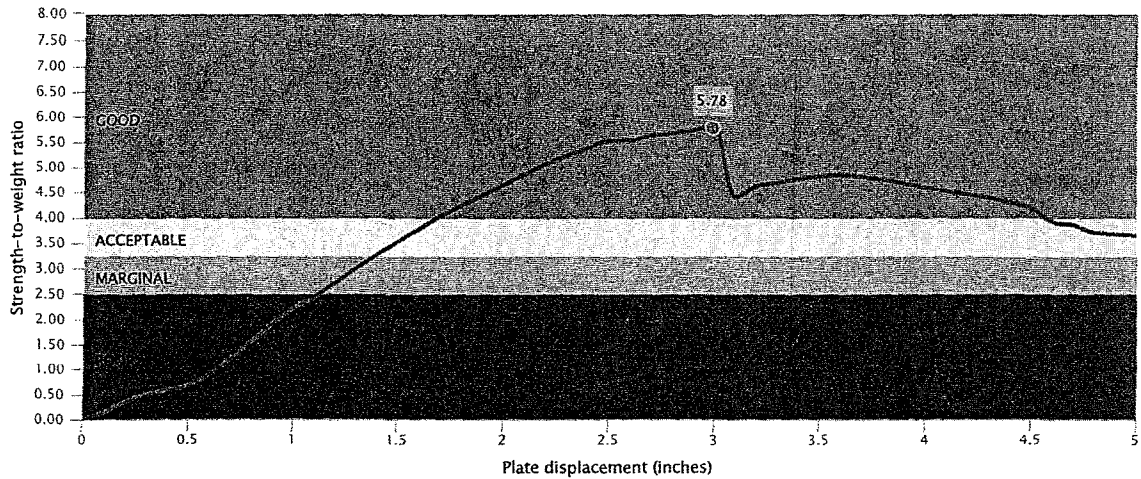
Roof strength

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	G3
Curb weight	3,166 lbs
Peak force	18,303 lbs
Strength-to-weight ratio	5.78
Tested vehicle	2015 Volkswagen GTI 4-door
Rating applies to the GTI 4-door (tested), Golf 4-door, and the structurally similar Golf SportWagen and Golf Alltrack.	

Roof strength test ratings can be compared across vehicle categories.



In the test, the strength of the roof is determined by pushing a metal plate against one side of it at a slow but constant speed. The force applied relative to the vehicle's weight is known as the strength-to-weight ratio. This graph shows how the ratio varied as the test of this vehicle progressed. The peak strength-to-weight ratio recorded at any time before the roof is crushed 5 inches is the key measurement of roof strength.

A good rating requires a strength-to-weight ratio of at least 4. In other words, the roof must withstand a force of at least 4 times the vehicle's weight before the plate crushes the roof by 5 inches. For an acceptable rating, the minimum required strength-to-weight ratio is 3.25. For a marginal rating, it is 2.5. Anything lower than that is poor.

4/6/2018



2016 Volkswagen Golf SportWagen

How this test is conducted

Head restraints & seats Power leather seat

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Dynamic rating	
Seat/head restraint geometry	

Important: Ratings for head restraints & seats should be compared only among vehicles of similar weight.

Seat type

Power leather seat

How this test is conducted

TECHNICAL MEASUREMENTS

Seat type	Power leather seat
Geometry	
Backset (mm)	29
Distance below top of head (mm)	12
Seat design parameters	
Pass/fail	Pass
Max T1 acceleration (g)	15.1
Head contact time (ms)	60
Force rating	1
Neck forces	
Max neck shear force (N)	6
Max neck tension (N)	397

Front crash prevention

DETAILS

Applies to 2016-17 models

System details

- › optional Front Assist (with Autonomous Emergency Braking)


Package name

4/6/2018

2016 Volkswagen Golf SportWagen

optional Driver Assistance Package

Overall evaluation


ADVANCED
 with optional
 equipment
 3 points total

Forward collision warning

This system meets the National Highway Traffic Safety Administration's criteria for forward collision warning.

1 point

Low-speed autobrake

In the 12 mph IIHS test, this vehicle avoided a collision.

2 points

High-speed autobrake

In the 25 mph IIHS test, impact speed was reduced by 1 mph.

0 points

How this rating is determined

Child seat anchors (LATCH) ease of use SE — leather seats

DETAILS

Applies to 2016-18 models

Overall evaluation 

How this rating is determined

Vehicle trim	SE
Seat type	leather

This vehicle has 2 rear seating positions with complete child seat attachment (LATCH) hardware.

It has 1 additional seating position with a tether anchor only.

4/6/2018

2016 Volkswagen Golf SportWagen



Good
Acceptable
Marginal
Poor
<input type="checkbox"/> Seating positions that rely on borrowed lower anchors or have only a tether anchor available are not rated.
Tether anchor
Lower anchors
Lower anchor(s) can be borrowed from adjacent position(s)
No hardware available

Details by seating position

1	Tether anchor
easy-to-find location	
no other hardware could be confused for anchor	
	Lower anchors
not too deep in seat	
not too much force needed to attach	
difficult to maneuver around anchors	
2	Tether anchor
hard-to-find location	
other hardware could be confused for anchor	
	Lower anchors
none available	
3	Tether anchor
easy-to-find location	
no other hardware could be confused for anchor	
	Lower anchors
not too deep in seat	
not too much force needed to attach	
difficult to maneuver around anchors	

TECHNICAL MEASUREMENTS

Seat position 21 **3**

Lower anchor A	
Open access rated	Yes

4/6/2018

2016 Volkswagen Golf SportWagen

Depth	Visible
Force (lbs)	0
Clearance angle (degrees)	0
Lower anchor B	
Open access rated	Yes
Depth	Visible
Force (lbs)	0
Clearance angle (degrees)	0
Tether anchor	
Location	Middle seatback
Confusing hardware present	Yes
Has contrasting label within 3 inches of tether anchor	Yes

Seat position 22 ²

Lower anchor A	
No lower latch for this seat position	
Lower anchor B	
No lower latch for this seat position	
Tether anchor	
Location	Floor
Confusing hardware present	Yes
Has contrasting label within 3 inches of tether anchor	No

Seat position 23 ¹

Lower anchor A	
Open access rated	Yes
Depth	Visible
Force (lbs)	0
Clearance angle (degrees)	0
Lower anchor B	
Open access rated	Yes
Depth	Visible
Force (lbs)	0
Clearance angle (degrees)	0
Tether anchor	
Location	Middle seatback
Confusing hardware present	Yes
Has contrasting label within 3 inches of tether anchor	Yes

Other safety features

Side airbags: front and rear head curtain airbags and front seat-mounted torso airbags

Rollover sensor: designed to deploy the side curtain airbags in the event of an impending rollover

Electronic stability control

4/6/2018

2016 Volkswagen Golf SportWagen

Antilock brakes

Daytime running lights

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4/6/2018

2016 Volkswagen GTI



2016 TOP SAFETY PICK+

2016 Volkswagen GTI

Small car



2015 Volkswagen GTI shown

CRASHWORTHINESS

Small overlap front

Driver-side



Passenger-side



Moderate overlap front



Side



Roof strength



Head restraints & seats




CRASH AVOIDANCE & MITIGATION

Front crash prevention



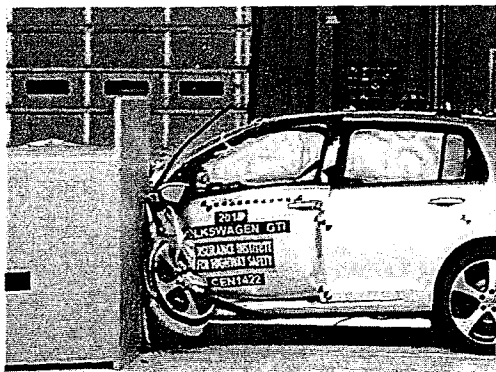
ADVANCED
with optional
equipment

Check for NHTSA recalls 

The photos and videos shown here may be of a different model, model year or body type from the one selected. The ratings of one vehicle often apply to other models if they are built on the same platform. In addition, a test of a vehicle from one model year may apply to earlier or later model years if the vehicle hasn't been significantly redesigned.

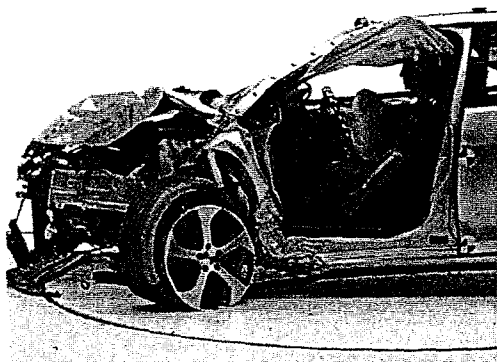
4/6/2018

2016 Volkswagen GTI



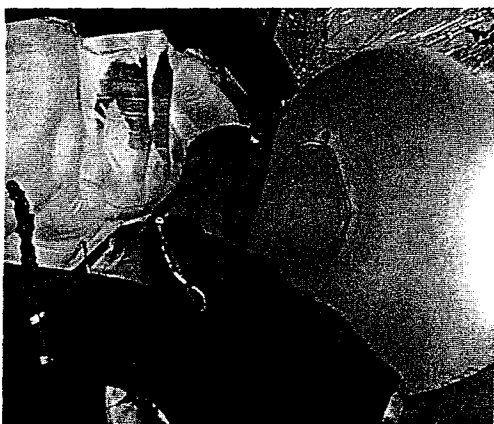
Small overlap front: — Driver-side —

Action shot taken during the driver-side small overlap frontal crash test.



Small overlap front: — Driver-side —

The dummy's position in relation to the door frame, steering wheel, and instrument panel after the crash test indicates that the driver's survival space was maintained well.



Small overlap front: — Driver-side —

During the crash, the dummy's head contacted the frontal airbag but then nearly slid off the left side. The seat belt allowed the dummy to move too far forward, as is evident from the gap between the seat back and the dummy's torso.

4/6/2018

2016 Volkswagen GTI



Small overlap front: — Driver-side —

Intrusion into the driver's space was minimal, and risk of injuries to the dummy's legs and feet was low.



2015 Volkswagen GTI driver-side small overlap test

Applies to 2015-16 models

Other model years

4/6/2018

2016 Volkswagen GTI

Model year	Small overlap front		Moderate overlap front	Side	Roof strength	Head restraints & seats	Front crash prevention	Headlights	LATCH ease of use
	Driver	Passenger							
2018								not rated	
2017									
2016								not rated	not rated
2015								not rated	not rated
2014	not rated	not rated						not rated	not rated
2013	not rated	not rated						not rated	not rated
2012	not rated	not rated						not rated	not rated
2011	not rated	not rated						not rated	not rated
2010	not rated	not rated						not rated	not rated

Small overlap front: Driver-side

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Structure and safety cage	
Injury measures	
Head/neck	
Chest	
Hip/thigh	
Lower leg/foot	
Restraints and dummy kinematics	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. The small overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Structure

4/6/2018

2016 Volkswagen GTI

The driver space was maintained well, with maximum intrusion of the lower interior of 10 cm at the lower hinge pillar. Upper interior intrusion measured 6-7 cm at the hinge pillar and instrument panel.

Injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Restraints and dummy kinematics

The dummy's head contacted the frontal airbag but nearly slid off the left side, leaving the head vulnerable to contact with forward structure. Additionally, the seat belt allowed excessive forward excursion of the dummy's head and torso. The side curtain airbag deployed and had sufficient forward coverage to protect the head from contact with side structure and outside objects.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,196 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

How this test is conducted

TECHNICAL MEASUREMENTS

Measures of occupant compartment intrusion on driver side

Test ID	CEN1422
Lower occupant compartment	
Lower hinge pillar max (cm)	10
Footrest (cm)	7
Left toepan (cm)	3
Brake pedal (cm)	1
Parking brake (cm)	
Rocker panel lateral average (cm)	1
Upper occupant compartment	
Steering column	3
Upper hinge pillar max (cm)	6
Upper dash (cm)	7
Lower instrument panel (cm)	6

Driver injury measures

Test ID	CEN1422
Head	

4/6/2018

2016 Volkswagen GTI

HIC-15	243
Peak gs at hard contact	no contact
Neck	
Tension (kN)	1.7
Extension bending moment (Nm)	17
Maximum Nij	0.31
Chest maximum compression (mm)	24
Femur (kN)	
Left	1.1
Right	0.1
Knee displacement (mm)	
Left	1
Right	0
Knee-thigh-hip injury risk (%)	
Left	0
Right	0
Maximum tibia index	
Left	0.55
Right	0.53
Tibia axial force (kN)	
Left	3.1
Right	0.7
Foot acceleration (g)	
Left	75
Right	38

Small overlap front: Passenger-side

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	A
Structure and safety cage	A
Passenger injury measures	
Head/neck	
Chest	
Hip/thigh	
Lower leg/foot	
Passenger restraints and dummy kinematics	
Driver injury measures	
Head/neck	
Chest	
Hip/thigh	
Lower leg/foot	
Driver restraints and dummy kinematics	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

4/6/2018

2016 Volkswagen GTI

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Passenger-side small overlap frontal ratings are assigned by the Institute based on a test conducted by Volkswagen as part of frontal crash test verification.

The passenger-side small overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Structure

The passenger space was maintained reasonably well, with maximum intrusion of the lower interior of 13 cm at the lower hinge pillar. Maximum upper interior intrusion measured 12 cm at the dashboard and 11 cm at the hinge pillar.

Passenger injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Passenger restraints and dummy kinematics

The dummy's head barely contacted the frontal airbag before sliding off the right side, leaving the head vulnerable to contact with forward structure. The side curtain airbag deployed and has sufficient forward coverage to protect the head from contact with side structure and outside objects.

Driver injury measures

Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Driver restraints and dummy kinematics

The dummy's movement was well controlled. The dummy's head loaded the frontal airbag, which stayed in front of the dummy until rebound.

Tested vehicle specifications

Tested vehicle	2016 Volkswagen GTI 4-door
Weight	3,150 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 34 mpg highway

How this test is conducted

TECHNICAL MEASUREMENTS

Measures of occupant compartment intrusion on passenger side

4/6/2018

2016 Volkswagen GTI

Test ID	VTP1725
Lower occupant compartment	
Lower hinge pillar max (cm)	13
Footrest (cm)	9
Right toepan (cm)	5
Center toepan (cm)	3
Rocker panel lateral average (cm)	2
Upper occupant compartment	
Center dash (cm)	9
Upper hinge pillar max (cm)	11
Upper dash (cm)	12
Right lower dash (cm)	11

Passenger injury measures

Test ID	VTP1725
Head	
HIC-15	165
Peak gs at hard contact	no contact
Neck	
Tension (kN)	1.5
Extension bending moment (Nm)	15
Maximum Nij	0.27
Chest maximum compression (mm)	
	26
Femur (kN)	
Left	0.2
Right	3.9
Knee displacement (mm)	
Left	0
Right	4
Knee-thigh-hip injury risk (%)	
Left	0
Right	0
Maximum tibia index	
Left	0.49
Right	0.29
Tibia axial force (kN)	
Left	2.2
Right	1.7
Foot acceleration (g)	
Left	65
Right	65

Driver injury measures

Test ID	VTP1725
Head	
HIC-15	159
Peak gs at hard contact	no contact

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2016 Volkswagen GTI

Neck	
Tension (kN)	0.8
Extension bending moment (Nm)	29
Maximum Nij	0.19
Chest maximum compression (mm)	
	33
Femur (kN)	
Left	0.1
Right	0.4
Knee displacement (mm)	
Left	0
Right	1
Knee-thigh-hip injury risk (%)	
Left	0
Right	0
Maximum tibia index	
Left	0.35
Right	0.25
Tibia axial force (kN)	
Left	0.5
Right	1.2
Foot acceleration (g)	
Left	48
Right	44

Moderate overlap front

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Structure and safety cage	
Injury measures	
Head/neck	
Chest	
Leg/foot, left	
Leg/foot, right	
Restraints and dummy kinematics	

Important: Frontal crash test ratings should be compared only among vehicles of similar weight.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Moderate overlap frontal ratings are assigned by the Institute based on a test conducted by Volkswagen as part of **frontal crash test verification**.

The moderate overlap frontal crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

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2016 Volkswagen GTI

Injury measures

Measures taken from the head, neck, and chest indicate low risk of injuries to these body regions in a crash of this severity. Forces on the right tibia indicate that lower leg injuries would be possible. Head accelerations from the roof rail and B-pillar hits were low.

Restraints and dummy kinematics

Dummy movement was well controlled. During rebound, the dummy's head hit the roof rail and B-pillar.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,095 lbs.
Side airbags	front and rear head curtain airbags and front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

How this test is conducted**TECHNICAL MEASUREMENTS**

Measures of occupant compartment intrusion on driver side

Test ID	VTF1401
Footwell intrusion	
Footrest (cm)	3
Left (cm)	4
Center (cm)	2
Right (cm)	1
Brake pedal (cm)	2
Instrument panel rearward movement	
Left (cm)	0
Right (cm)	0
Steering column movement	
Upward (cm)	-2
Rearward (cm)	-7
A-pillar rearward movement (cm)	0

Driver injury measures

Test ID	VTF1401
Head	
HIC-15	301
Peak gs at hard contact	26
Neck	

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2016 Volkswagen GTI

Tension (kN)	1.9
Extension bending moment (Nm)	43
Maximum Nij	0.33
Chest maximum compression (mm)	33
Legs	
Femur force - left (kN)	0.2
Femur force - right (kN)	0.3
Knee displacement - left (mm)	0
Knee displacement - right (mm)	0
Maximum tibia index - left	0.37
Maximum tibia index - right	0.98
Tibia axial force - left (kN)	2.7
Tibia axial force - right (kN)	1.9
Foot acceleration (g)	
Left	95
Right	82

Side

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	
Structure and safety cage	
Driver injury measures	
Head/neck	
Torso	
Pelvis/leg	
Head protection	
Rear passenger injury measures	
Head/neck	
Torso	
Pelvis/leg	
Head protection	

Side crash test ratings can be compared across vehicle categories.

The Volkswagen Golf and GTI were redesigned for the 2015 model year. Side ratings are assigned by the Institute based on a test conducted by Volkswagen as part of **side crash test verification**.

The side crash test ratings also apply to the station wagon version of the Golf, known as the Golf SportWagen, introduced in the 2015 model year as a replacement for the Jetta SportWagen. Similarly, the ratings apply to the 4-wheel-drive variant of the wagon, the Golf Alltrack, introduced in the 2017 model year.

Injury measures

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2016 Volkswagen GTI

Driver — Measures taken from the dummy indicate a left femur fracture would be possible in a crash of this severity. The risk of significant injuries to other body regions is low.

Passenger — Measures taken from the dummy indicate a low risk of any significant injuries in a crash of this severity.

Head protection

Driver — The dummy's head was protected from being hit by any hard structures, including the intruding barrier, by a side curtain airbag that deployed from the roof.

Passenger — The dummy's head was protected from being hit by any hard structures, including the intruding barrier, by a side curtain airbag that deployed from the roof.

Tested vehicle specifications

Tested vehicle	2015 Volkswagen GTI 4-door
Weight	3,115 lbs.
Side airbags	standard front and rear head curtain airbags and standard front seat-mounted torso airbags
Wheelbase	104 in.
Length	168 in.
Width	71 in.
Engine	2.0 L turbocharged 4-cylinder
EPA ratings	25 mpg city / 33 mpg highway

How this test is conducted

TECHNICAL MEASUREMENTS

Measures of occupant compartment intrusion on driver side

Test ID	VTS1402
B-pillar to longitudinal centerline of driver's seat (cm)	-22.0
Negative numbers indicate the amount by which the crush stopped short of the seat centerline.	

Driver injury measures

Test ID	VTS1402
Head HIC-15	154
Neck	
Tension (kN)	1.0
Compression (kN)	0.5
Shoulder	
Lateral deflection (mm)	43
Lateral force (kN)	1.2
Torso	
Maximum deflection (mm)	34
Average deflection (mm)	32
Maximum deflection rate (m/s)	2.67

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2016 Volkswagen GTI

Maximum viscous criterion (m/s)	0.40
Pelvis	
Iliac force (kN)	2.1
Acetabulum force (kN)	1.7
Combined force (kN)	3.6
Left femur	
L-M force (kN)	0.8
L-M moment (Nm)	266
A-P moment (Nm)	41


Passenger injury measures

Test ID	VTS1402
Head HIC-15	112
Neck	
Tension (kN)	0.3
Compression (kN)	0.1
Shoulder	
Lateral deflection (mm)	43
Lateral force (kN)	1.5
Torso	
Maximum deflection (mm)	37
Average deflection (mm)	31
Maximum deflection rate (m/s)	3.47
Maximum viscous criterion (m/s)	0.44
Pelvis	
Iliac force (kN)	0.3
Acetabulum force (kN)	2.8
Combined force (kN)	2.8
Left femur	
L-M force (kN)	1.0
L-M moment (Nm)	65
A-P moment (Nm)	28

Roof strength

TEST DETAILS

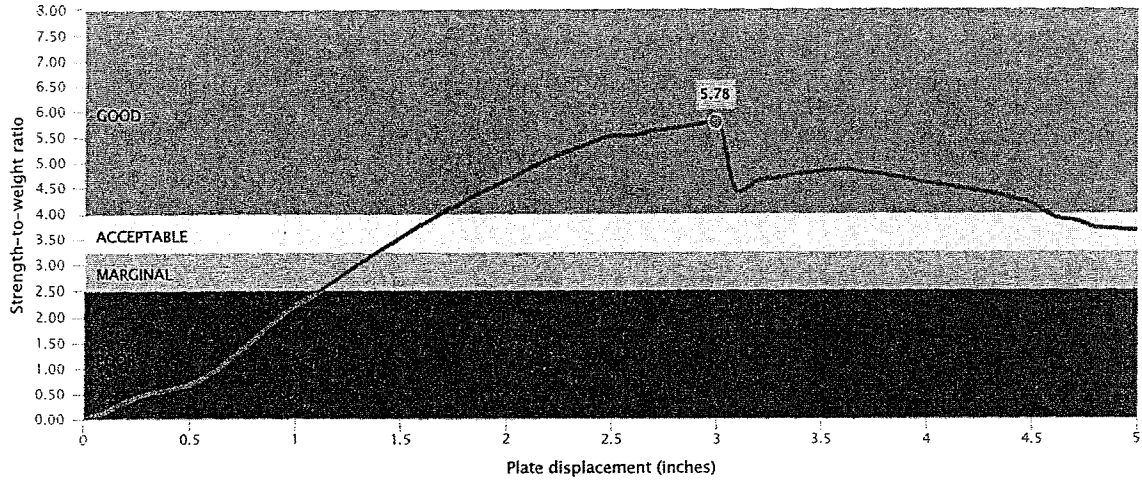
Applies to 2015-18 models

Overall evaluation	
Curb weight	3,166 lbs
Peak force	18,303 lbs
Strength-to-weight ratio	5.78
Tested vehicle	2015 Volkswagen GTI 4-door
Rating applies to the GTI 4-door (tested), Golf 4-door, and the structurally similar Golf SportWagen and Golf Alltrack.	

Roof strength test ratings can be compared across vehicle categories.

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2016 Volkswagen GTI



In the test, the strength of the roof is determined by pushing a metal plate against one side of it at a slow but constant speed. The force applied relative to the vehicle's weight is known as the strength-to-weight ratio. This graph shows how the ratio varied as the test of this vehicle progressed. The peak strength-to-weight ratio recorded at any time before the roof is crushed 5 inches is the key measurement of roof strength.

A good rating requires a strength-to-weight ratio of at least 4. In other words, the roof must withstand a force of at least 4 times the vehicle's weight before the plate crushes the roof by 5 inches. For an acceptable rating, the minimum required strength-to-weight ratio is 3.25. For a marginal rating, it is 2.5. Anything lower than that is poor.

How this test is conducted

Head restraints & seats Power leather seat

TEST DETAILS

Applies to 2015-18 models

Overall evaluation	<input checked="" type="checkbox"/>
Dynamic rating	<input checked="" type="checkbox"/>
Seat/head restraint geometry	<input checked="" type="checkbox"/>

Important: Ratings for head restraints & seats should be compared only among vehicles of similar weight.

Seat type

Power leather seat

How this test is conducted

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2016 Volkswagen GTI

TECHNICAL MEASUREMENTS

Seat type	Power leather seat
Geometry	
Backset (mm)	29
Distance below top of head (mm)	12
Seat design parameters	
Pass/fail	Pass
Max T1 acceleration (g)	15.1
Head contact time (ms)	60
Force rating	1
Neck forces	
Max neck shear force (N)	6
Max neck tension (N)	397

Front crash prevention

DETAILS

Applies to 2016-17 models

System details

- optional Front Assist (with Autonomous Emergency Braking)

Package name

- optional Driver Assistance Package

Overall evaluation


ADVANCED
 with optional
 equipment
3 points total

Forward collision warning

This system meets the National Highway Traffic Safety Administration's criteria for forward collision warning. 1 point

Low-speed autobrake

In the 12 mph IIHS test, impact speed was reduced by 10 mph. 2 points

High-speed autobrake

In the 25 mph IIHS test, impact speed was reduced by 1 mph. 0 points

How this rating is determined

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2016 Volkswagen GTI

Other safety features

Side airbags: front and rear head curtain airbags and front seat-mounted torso airbags

Rollover sensor: designed to deploy the side curtain airbags in the event of an impending rollover (beginning with 2016 models built after June 2015)

Electronic stability control

Antilock brakes

Daytime running lights

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2016 Volkswagen Jetta



2016 TOP SAFETY PICK+

2016 Volkswagen Jetta

Midsized car



2016 Volkswagen Jetta

CRASHWORTHINESS

Small overlap front

Driver-side



Passenger-side



Moderate overlap front



Side



Roof strength



Head restraints & seats



CRASH AVOIDANCE & MITIGATION

Front crash prevention



ADVANCED
with optional
equipment

Headlights



only certain
trims/options

CHILD SEAT ANCHORS (LATCH)
EASE OF USE

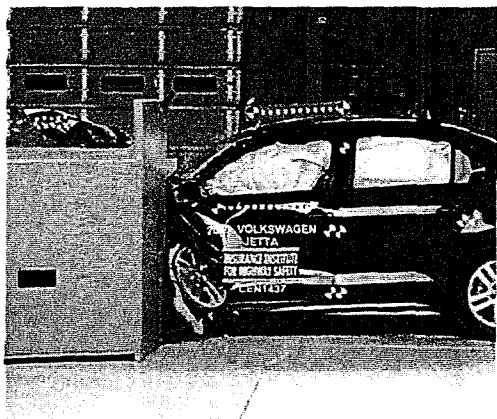


Check for NHTSA recalls

4/6/2018

2016 Volkswagen Jetta

The photos and videos shown here may be of a different model, model year or body type from the one selected. The ratings of one vehicle often apply to other models if they are built on the same platform. In addition, a test of a vehicle from one model year may apply to earlier or later model years if the vehicle hasn't been significantly redesigned.



Small overlap front: — Driver-side —

Action shot taken during the driver-side small overlap frontal crash test.



Small overlap front: — Driver-side —

The dummy's position in relation to the door frame, steering wheel, and instrument panel after the crash test indicates that the driver's survival space was maintained very well.



Small overlap front: — Driver-side —

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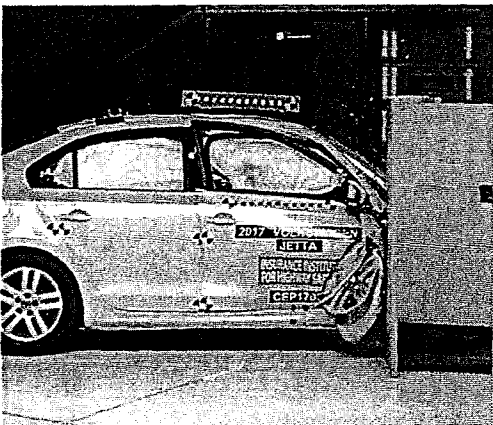
2016 Volkswagen Jetta

The dummy's head and torso barely contacted the airbag before sliding off to the left, and the seat belt allowed the dummy to move too far forward, as is evident from the gap between the seat back and the dummy's torso.



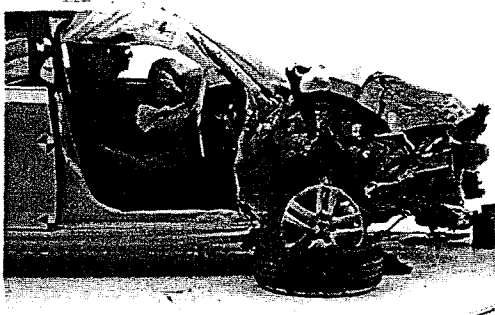
Small overlap front: — Driver-side —

The driver's space was maintained very well, and risk of injuries to the dummy's legs and feet was low.



Small overlap front: — Passenger-side —

Action shot taken during the passenger-side small overlap frontal crash test.



Small overlap front: — Passenger-side —

The dummy's position in relation to the door frame and dashboard after the crash test indicates that the passenger's survival space was maintained reasonably well.

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2016 Volkswagen Jetta



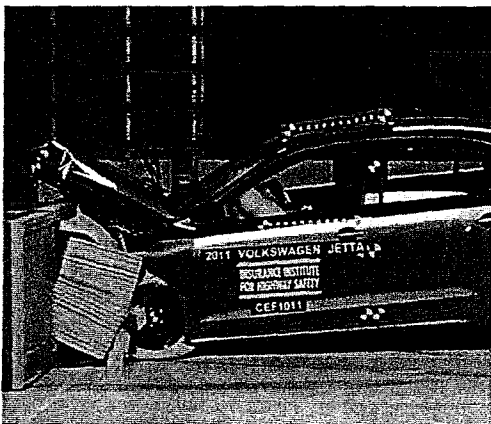
Small overlap front: — Passenger-side —

The dummy's head barely contacted the frontal airbag before sliding off the right side and approaching the dashboard.



Small overlap front: — Passenger-side —

The passenger's space was maintained reasonably well, and risk of injuries to the dummy's legs and feet was low.



Moderate overlap front —

Action shot taken during the Institute's frontal offset crash test.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action: Safety Systems in 2016-, 2017-Model Volkswagens Do Not Work Above 25 MPH](#)
