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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

Alec Plotts, *on behalf of himself and all
 others similarly situated,*

Plaintiff,

vs.

American Honda Motor Co., Inc.,

Defendant.

Case No.:

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

1 Plaintiff Alec Plotts, by undersigned counsel, brings the following complaint
2 against American Honda Motor Co., Inc., and alleges, on his own behalf and on behalf
3 of all those similarly situated, as follows:
4

5 **INTRODUCTION**

6 1. Plaintiff Alec Plotts (“Plotts” and/or “Plaintiff”) brings this lawsuit
7 against American Honda Motor Co., Inc. (hereafter “Defendant” or “Honda”) on his
8 own behalf and on behalf of a proposed class of past and present owners and lessees
9 of the following 2020-2021 Honda Pilot (all except LX), 2020 Honda Passport (all
10 except Sport), 2021 Honda Passport, and 2020 Honda Odyssey (all except LX)
11 vehicles (hereinafter, the “Class Vehicles” or “Vehicles”).
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14 2. Plaintiff and the Class were damaged because the Class Vehicles contain
15 a defect that causes an intermittent, unpredictable, and loud popping and/or crackling
16 from the speakers irrespective whether the sound system is on or off, or no sound from
17 the audio system when audio should be playing (hereafter, the “Electrical Defect” or
18 “Defect”).
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21 3. When the Defect occurs, it does so abruptly and unpredictably, startling
22 the driver and the passengers, and poses a safety risk because the Defect can cause the
23 driver to become distracted. Moreover, to stop the Defect from manifesting itself, the
24 Vehicle Owners need to pull over and shut their vehicles off, and restart their vehicles,
25 which is only a temporary solution, until the Electrical Defect manifests itself again.
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1 Indeed, Plaintiff has had to pull over and shut his vehicle off on multiple occasions to
2 stop the Electrical Defect from occurring.
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4 4. Honda either knew of the defect before marketing the Vehicles or failed
5 to conduct adequate testing of the Vehicles system prior to its release. Regardless,
6 soon after the release of the Vehicles, and before Plaintiff purchased his Class
7 Vehicle, Honda must have known of the defect based on the numerous customer
8 complaints it received and own investigation of the Defect, and yet Honda continued
9 to market the Vehicles.
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12 5. Under the Vehicles' New Vehicle Limited Warranty, Honda is required
13 to "repair or replace any part that is defective in material or workmanship under
14 normal use."¹
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16 6. But, despite issuing several Technical Service Bulletins, and settling a
17 class action lawsuit involving substantially the same Defect in 2018-2019 Honda
18 Odyssey, 2019 Honda Pilot, and 2019 Honda Passport vehicles, Honda still has not
19 found a solution to the Electrical Defect. Instead, Honda simply replaces defective
20 parts with equally defective parts, thereby leaving consumers caught in a cycle of use,
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24 _____
25 ¹ A true and correct copy of the New Vehicle Limited Warranty is available at
26 https://owners.honda.com/Documentum/Warranty/Handbooks/2020_Honda_Warranty_Basebook_Rev02_FINAL_-_SIS.pdf;
27 https://owners.honda.com/Documentum/Warranty/Handbooks/2021_Honda_Warranty_Basebook_Petrol_Hybrid_PHEV.pdf (last visited Jun. 30, 2022).
28

1 malfunction, and replacement.

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3 7. Indeed, numerous Class Vehicles owners voiced their complaints on the
4 National Highway and Traffic Safety Administration website that despite presenting
5 their vehicles to Honda's authorized dealerships for repairs the Defect persists:

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

1 local dealership (Shottenkirk) but at what point will Honda step up and
2 do something of substance to fix the issue or replace the vehicles? This,
3 in my opinion, is not a "Shottenkirk" problem, it is a "Honda" problem. I
4 have tweeted Honda North America and Honda Customer Service and
5 simply got a reply that says they've created a file and will look into it.

- 6 • NHTSA ID Number 11444494, December 20, 2021 (Incident Date April
7 17, 2021): My vehicle was recalled twice before 2,500 miles for wiring
8 harness connector issues (snapping, popping, crackling). I was told I
9 could lose visibility with all dash functions, navigation, radio, etc. After
10 the first and second recall service fix I continued to experience the same
11 symptoms. I opened a case with Honda in June, 2021, and notified my
12 local dealer. The Honda case number is 12314702. I have heard nothing
13 from either Honda and my local dealer, and I am concerned nothing is
14 being done on this issue and I will lose visibility of my dash at some
15 point, putting myself and family in danger.
- 16 • NHTSA ID Number 11445959, January 3, 2022 (Incident Date August
17 25, 2021): Head unit has supposedly been "fixed" already, still losing all
18 electronics, black out screen, loud and startling popping noises. Been
19 asking Honda to fix for months, assigned a case, they just do not seem to
20 care and now vehicle is undrivable due to loud, startling sound that may
21 cause an accident, as well as not knowing if any of the safety electronics
22 are working or not. It almost sounds like shorting out and that means
23 possibility of electrical fire. Honda is dragging their feet doing
24 ANYTHING on this obviously as this has been going on for months.
- 25 • NHTSA ID Number 11449070, January 27, 2022 (Incident Date January
26 26, 2022): Since new, the audio/navigation system has repeatedly turned
27 off and on, had crackling noises emitted from the speakers and issues
28 system warnings. I retuned my first Pilot for the same issues and now this
Pilot is demonstrating the same issues. I have had the vehicle at the
dealer several times and they just say that it's common with this vehicle
model and the Passport with navigation systems. HONDA national
service does not return calls and this issue is noted on many HONDA
forums. This condition is unacceptable and dangerous.
- NHTSA ID Number 11452259, February 16, 2022 (Incident
Date February 9, 2022): The infotainment system makes a
popping/crackling sound. The dash display and infotainment display
flickers on and off at times. This condition makes impedes the use of the

1 the user controls and feedback systems. The vehicle went in for service
2 on October 15, 2021 to have a technical service bulletin update
3 implemented. The vehicle started exhibiting the issue again on February
4 9, 2022 in a much more extreme and severe way. It went back for service
5 on February 15, 2022 to have the original work "inspected". The dealer
6 said everything was fine and did nothing. Honda as implemented a
7 couple of Technical Service Bulletins, but no permanent fix has been
8 implemented. The dealer mentioned that they apply this TSB to
9 approximately 2 Pilots per day.

- 10 • NHTSA ID Number 11452304, February 16, 2022 (Incident
11 Date December 14, 2021): Our Pilot is brand new - we started noticing
12 popping and cracking sounds from the dashboard. It is pretty loud. We
13 thought it was possibly the radio but it continues with the radio off. We
14 thought it was the dashboard contracting/expanding but it happens in all
15 weather. It has become increasing loud and consistent and now any
16 sounds from the stereo, regardless of input, skip and glitch and we turn it
17 off and the popping and cracking sound continues seemingly from the
18 speakers. We took it to the dealership for repair but they said they can't
19 repair it. This is not acceptable for a new car.

20 8. Despite providing an authorized Honda dealership and Honda engineers
21 four attempts to repair Plaintiff's Vehicle, the Vehicle continues to suffer from the
22 Electrical Defect.

23 9. Accordingly, Plaintiff brings this action for breach of express and
24 implied warranties, fraudulent concealment, unjust enrichment, and violations of the
25 Minnesota Consumer Fraud Act, on behalf of a nationwide class of Vehicle lessees
26 and owners. Plaintiff seeks damages and equitable relief on behalf of himself and all
27 others similarly situated.

28 10. Honda has and will continue to benefit from its unlawful conduct – by
selling more vehicles, at a higher price, and avoiding warranty obligations – while

1 consumers are harmed at the point of sale as their vehicles continue to suffer from
2 unremedied defect with their electrical systems. Had Plaintiff and other proposed
3 Class members known about the Defect at the time of purchase or lease, they would
4 not have bought or leased the Class Vehicles, or would have paid substantially less for
5 them.
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8 11. To remedy Honda's unlawful conduct, Plaintiff, on behalf of proposed
9 class members, seeks damages and restitution from Honda, as well as notification to
10 Class members about the Defect.
11

12 PARTIES

13 12. Plaintiff Alec Plotts is, and at all times mentioned herein was, an adult
14 individual residing in Lake Elmo, Minnesota.
15

16 13. Defendant American Honda Motor Co., Inc. is headquartered at 1919
17 Torrance Boulevard, Torrance, California 90501-2746.
18

19 JURISDICTION AND VENUE

20 14. This Court has subject matter jurisdiction over this action pursuant to 28
21 U.S.C. § 1332(d) of the Class Action Fairness Act of 2005 because: (i) there are 100
22 or more class members, (ii) there is an aggregate amount in controversy exceeding
23 \$5,000,000, exclusive of interest and costs, and (iii) there is minimal diversity because
24 Plaintiff and Honda are citizens of different states.
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1 15. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because
2 Honda resides in this District and a substantial part of the events or omissions giving
3 rise to Plaintiff's claims occurred in this District.
4

5 **FACTUAL ALLEGATIONS**

6 **A. Honda's Knowledge of the Defect**
7

8 16. Honda designed, engineered, manufactured, tested, warranted, advertised,
9 distributed, sold, and leased the Class Vehicles equipped with defective electrical
10 components that cause a loud and unexpected popping or crackling sound to come
11 from the speakers or no sound from the audio system. Furthermore, such loud and
12 unexpected popping and crackling interrupts audio playback from the vehicle's
13 infotainment system and interrupts conversations over the Vehicle's hands-free phone
14 system.
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17 17. Because the Vehicles' speakers and audio system is responsible for
18 providing audible cues for a wide variety of vehicle functions (including navigation,
19 audio, video, hands-free phone, back up cameras, etc.), the defect causes a wide range
20 of problems for the Vehicles, where the Electrical Defect interrupts the functioning of
21 such functions.
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24 18. But it is not only lack of repair that keeps owners of such Class Vehicles
25 frustrated. Indeed, when the Defect occurs, it does so abruptly, unpredictably, and
26 without warning, while the Class Vehicles are in motion on a public roadway, startling
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1 the driver, and thus poses a safety risk because the Defect can cause the driver to
2 become distracted.
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4 19. Honda has long standing knowledge of the Electrical Defect. There exist
5 a large number of customer complaints on the NHTSA Office of Defect Investigations
6 (“ODI”) website, www.safercar.gov, as well as other customer forums addressing car
7 defect and safety issues.
8

9 20. Federal law requires automakers like Honda to be in close contact with
10 NHTSA regarding potential auto defects, including imposing a legal requirement
11 (backed by criminal penalties) compelling the confidential disclosure of defects and
12 related data by automakers to NHTSA, including field reports, customer complaints,
13 and warranty data. *See* TREAD Act, Pub. L. No. 106-414, 114 Stat. 1800 (2000).
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16 21. Automakers have a legal obligation to identify and report emerging
17 safety-related defects to NHTSA under the Early Warning Report requirements. *Id.*
18 Similarly, automakers should and do monitor NHTSA databases for consumer
19 complaints regarding their automobiles as part of their ongoing obligation to identify
20 potential defects in their vehicles, including safety-related defects. *Id.*
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23 22. Consistent with its legal duties identified above, and in addition to dealer
24 reports made directly to Honda, Honda knew or should have known of the many
25 complaints about the Electrical Defect logged by NHTSA ODI, and the content,
26 consistency, and large number of those complaints that alerted, or should have alerted,
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1 Honda to the Electrical Defect.

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3 23. To wit, the Electrical Defect is so pervasive in the Class Vehicles, and in
4 the vehicles of preceding model years, that numerous vehicles owners voiced their
5 complaints about the loud and unexpected popping or crackling sound coming from
6 the speakers or no sound from the audio system to the NHTSA:
7

8 ***2019 Honda Pilot:***

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- 10 • NHTSA ID Number 11165340, January 5, 2019 (Incident
11 Date November 15, 2018): WHILE DRIVING, BOTH HIGHWAY AND
12 AROUND TOWN, LOUD CRACKLING WOULD OCCUR
13 THROUGH THE SPEAKERS. THEN BOTH THE NAVIGATION
14 SCREEN AND/OR THE SPEEDOMETER SCREEN WOULD GO
15 COMPLETELY BLACK. THE MESSAGE "NETWORK
16 CONNECTION LOST" WOULD SOMETIMES APPEAR. ALL
17 BLUETOOTH CONNECTIVITY AND SPEAKER USAGE WAS
18 LOST. THIS OCCURS ALMOST EVERY DAY WHILE
19 COMMUTING. CAR HAS BEEN BROUGHT TO HONDA SERVICE
20 TWICE FOR REPAIRS.
 - 21 • NHTSA ID Number 11190215, March 20, 2019 (Incident Date March
22 16, 2019): RECURRENT PROBLEM. STARTED WHEN VEHICLE
23 WAS 2 MONTHS OLD. TAKEN CAR TO DEALER SERVICE
24 DEPARTMENT. NO SOLUTION. WHEN IN MOTION (HIGHWAYS,
25 CITY ROADS) SPEAKERS MAKE A SPARKLING SOUND
26 FOLLOWED BY THE ENTERTAINMENT SCREEN (NAVIGATION,
27 HANDHELD PHONE, REAR VISION...) AND THE ODOMETER
28 SCREEN (SPEED DISPLAY, ALL THE SIGNALS) BECAME DEAD.
IT COULD LAST FEW SECONDS AND REBOOT BACK OR UP TO
30 MINUTES. IN A 15 MILE JOURNEY , COULD HAPPEN
AROUND 15 TIMES. SO THE DANGEROUS SITUATION IS THAT I
AM DRIVING WITH NO IDEA HOW MUCH SPEED I AM GOING, I
AM NOT ABLE TO USE MY HANDHELD PHONE (ALSO VERY
IMPORTANT TO ME AS A BUSY DOCTOR TRYING TO ANSWER
EMERGENCY CALLS), NO NAVIGATION SYSTEM AVAILABLE,
THE REAR VISION CAMERA BECOMES USELESS WITH A

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BLANK SCREEN... I LEARNT FROM THE INTERNET THAT THIS IS AN ONGOING PROBLEM AND NO SOLUTION HAVE BEEN FOUND. PROBLEM HAPPENS IN MOTION AND ALSO OR WHEN CAR IS PARKED. MY CAR IS 4 MONTHS OLD AND HAS SPENT SEVERAL DAYS AT THE DEALER SERVICE DEPARTMENT AND AT THE LAST VISIT I WAS GIVEN A REPORT IN WHICH STATES THAT HONDA IS STUDYING A NEW SOFTWARE UPDATE. I DON'T WANT RISK MY FAMILY OR OTHERS LIFE'S SO WAITING IS NOT AN OPTION. THIS IS NOT JUST ONE INCIDENT , IT KEEPS RECURRING WE BOUGHT THE CAR BRAND NEW FROM THE HONDA DEALER IN NOVEMBER 2018. I HAVE VIDEOS TO PROVIDE PROOF (CAN NOT ATTACH THEM)

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

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- NHTSA ID Number 11256266, September 17, 2019 (Incident Date June 27, 2019): THERE ARE SEVERAL ISSUES AND THEY HAVE HAPPENED MANY TIMES - ALL RELATED TO ELECTRICAL SYSTEM, SPEEDOMETER AND INFOTAINMENT DEFECTS. THE INFOTAINMENT AND DASH DISPLAY INCLUDING THE SPEEDOMETER SHUT OFF WHILE DRIVING. THIS INCLUDES THE SPEEDOMETER, ALL SAFETY FEATURES, CRUISE CONTROL SHUTTING OFF WHILE DRIVING. ALSO THE AUDIO WILL COMPLETELY SHUT OFF WHILE DRIVING AND I WILL HAVE NO AUDIO FOR HOURS AT A TIME. ALSO THERE ARE POPS AND CRACKLES OUT OF THE SPEAKERS EVERY TIME I DRIVE THE VEHICLE. I HAVE DETAILED DOCUMENTATION FOR THESE ISSUES INCLUDING VIDEOS OF THE ISSUES HAPPENING WHILE DRIVING. DEALERSHIP HAS ATTEMPTED TO REPAIR SEVERAL TIMES AND THE ISSUES GET WORSE, NOT BETTER.

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

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OF MY SAME VEHICLE.

- NHTSA ID Number 11258912, September 30, 2019 (Incident Date September 28, 2019): I PURCHASED THE VEHICLE ON AUGUST 10, 2019. WITHIN 2 WEEKS THE RADIO BEGAN MAKING A POPPING AND CRACKING SOUND THAT SOUNDED LIKE ROCKS HITTING THE WINDSHIELD. THIS SOUND HAPPENS DAILY WHEN I DRIVE THE VEHICLE. ABOUT ONE WEEK AFTER THIS HAPPENED, THE DVD PLAYER WOULD STOP WORKING AND THE SOUND FROM THE RADIO WOULD BEGIN TO COMPLETELY GO OUT. IT WOULD COME BACK ON EVENTUALLY, SOMETIMES AS MUCH AS 30 - 45 MINUTES LATER. AFTER ABOUT TWO WEEKS, THESE PROBLEMS CONTINUED AND THE SCREEN FOR NAVIGATION, ALONG WITH THE SPEEDOMETER SCREEN WOULD COMPLETELY GO BLACK WHILE THE VEHICLE WAS IN MOTION. IT RESTARTS AFTER ABOUT 10 - 20 SECONDS. IN TWO INSTANCES THE REAR BACKUP CAMERA HAS SHUT OFF WHILE I WAS BACKING UP AS WELL. I HAVE REPORTED THE ISSUE TO TWO DEALERSHIPS INCLUDING THE ONE WHERE I MADE THE PURCHASE. I AM SCHEDULED TO TAKE IT IN TO HAVE REPAIRS DONE TOMORROW.
- NHTSA ID Number 11266621, October 6, 2019 (Incident Date October 2, 2019): 1ST PROBLEM...VIDEO DISPLAY WORKED ONLY INTERMITTENTLY. 1ST VISIT, WOLFCHASE HONDA UPDATED SOFTWARE, PROBLEM CONTINUED. 2ND VISIT THEY REPLACED VIDEO UNIT. 2ND PROBLEM...SPEAKERS STARTED MAKING CRACKLING NOISE. WENT ON THEIR SITE TO MAKE APPT AND RECEIVED A NOTICE THAT OF A RECALL NOTICE ABOUT ELECTRICAL ISSUE (OR A FLEET CAMPAIGN NOT SURE WHICH). THEY UPDATED SOFTWARE ON THAT 3RD VISIT. SPEAKER PROBLEM WORSENER AFTER THAT VISIT AND SPEEDOMETER DISPLAY AND VIDEO (STEREO SYSTEM, NAVIGATION ETC) WOULD BLANK OUT WHILE DRIVING. SYSTEM WOULD GENERALLY RESET BUT ONLY AFTER 30 SECONDS OF NON VISIBILITY TO MY SPEED, CRUISE CONTROL STATUS ETC.. TOOK IT BACK FOR 4TH VISIT. THEY STATED THEY FOUND AN ISSUE WITH TAILGATE SENSOR. PICKED IT UP ON FRIDAY OCT 4TH AND IT STARTED MAKING

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THE CRACKLING NOISE IN THE SPEAKERS AGAIN YESTERDAY, OCT 5TH. LAST TIME, IT EVENTUALLY GOT WORSE UNTIL SPEEDOMETER STOPPED WORKING. PLAN TO MAKE ANOTHER APPT (MY 5TH) THIS WEEK. CRACKLING NOISE OCCURS WHEN STOPPED, WHEN DRIVING, WHEN VEHICLE IS TURNED OFF (AFTER BEING ON). VIDEO AND SPEEDOMETER DISPLAY STOP WORKING WHEN DRIVING.

2020 Honda Pilot:

- NHTSA ID Number 11282937, November 29, 2019 (Incident Date November 29, 2019): WE'VE HAD 3 HONDAS AND HAVE BEEN VERY LOYAL HONDA FANS FOR, CLAIMING TO NEVER BUY ANOTHER BRAND. WE BOUGHT OUR PILOT BRAND NEW AND LOVED IT. WE'RE AT 3700 MILES AND HAVING MAJOR ELECTRICAL ISSUES. THE SPEAKERS CRACKLE AND POP LOUDLY CONSTANTLY, WITH THE AUDIO ON OR OFF SO THERE'S NO WAY TO GET A BREAK FROM IT. THE CAR WILL THINK THERE'S GOING TO BE A COLLISION WHEN THERE'S NOTHING IN FRONT OF IT. NOW TODAY, MY HUSBAND DID THE REMOTE START AND WHEN HE GOT OUT TO THE VEHICLE, ALL THE WINDOWS WERE HALF DOWN AND THE SUNROOF HALF OPEN! WE HAVE THE WARRANTY, I MADE AN APPOINTMENT WITH OUR DEALER FOR SERVICE BUT HERE'S THE THING...AFTER RESEARCHING ONLINE I HAVE DISCOVERED THIS IS AN ONGOING ISSUE THAT APPARENTLY HAS NO SOLUTION?! THIS IS VERY DISCOURAGING AND DISAPPOINTING. OUR BRAND NEW PILOT THAT WE LOVED IS NOW A SOURCE OF STRESS AND ANXIETY. HONDA, WHY CONTINUE ROLLING OUT VEHICLES KNOWING THERE IS AN ISSUE WITH YOUR INFOTAINMENT SYSTEM??? MY LOVE OF HONDA IS RAPIDLY SOURING.
- NHTSA ID Number 11297378, January 6, 2020 (Incident Date January 6, 2020): AS PER OTHER DRIVERS OF 2019 PILOTS AND ODYSSEYS, THE SCREENS ON MY NEW 2020 VEHICLE HAVE GONE OUT, WHILE DRIVING, RENDERING IT IMPOSSIBLE TO GET ANY INFORMATION ABOUT THE VEHICLE, INCLUDING SPEED, WHILE THE VEHICLE IS IN OPERATION. DASHBOARD REBOOTS SEVERAL TIMES WHILE DRIVING. BACKUP

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CAMERA IS NOT ABLE TO BE UTILIZED DURING THESE EVENTS. WHILE NOT AS DANGEROUS, SPEAKERS EMIT A LOUD CRACKLING NOISE AND NO ENTERTAINMENT OR NAVIGATION SYSTEMS ARE ABLE TO BE USED (INCLUDING REAR ENTERTAINMENT CENTER).

- NHTSA ID Number 11298042, January 8, 2020 (Incident Date December 17, 2019): THESE ISSUES OCCUR WHEN DRIVING, REGARDLESS OF SPEED, ROAD CONDITIONS, ETC. THE ISSUE BEGAN ON APPROXIMATELY 12/17/2019. THE PROBLEM USUALLY STARTS WITH A LOUD CRACKLING NOISE THROUGH THE SPEAKERS, EVEN WHEN THE RADIO IS TURNED OFF. THE DASH, INCLUDING SPEEDOMETER, WILL SHUT OFF LEAVING A BLACK SCREEN WHICH MEANS I HAVE NO IDEA HOW FAST I'M DRIVING. THE CENTER CONSOLE, INCLUDING SATELLITE NAVIGATION AND RADIO, ALSO SHUTS OFF LEAVING A BLACK SCREEN. I PURCHASED THIS MODEL SPECIFICALLY FOR THE SATELLITE NAVIGATION SYSTEM AS I DRIVE FOR WORK & DEPEND ON THIS FUNCTIONALITY. THE ENTERTAINMENT SYSTEM SHUTS DOWN. THE BACKUP CAMERAS AND SAFETY SENSORS ALSO STOP WORKING WHICH MAKES PARKING AND REVERSING DANGEROUS. VOICE CONTROLS AND ABILITY TO MAKE EMERGENT PHONE CALLS ARE NO LONGER AVAILABLE. ALL OF THE AFOREMENTIONED "SHUT DOWN" ISSUES OCCUR SIMULTANEOUSLY AND DO NOT GENERALLY RESOLVE PRIOR TO THE VEHICLE BEING TURNED OFF. WHEN THE DASH IS WORKING, THE BRAKE WARNING OFTEN FLASHES WHEN THERE ARE NO OTHER CARS CLOSE BY. THE CAR HAS BEEN RETURNED TO THE HONDA SERVICE DEPARTMENT THREE TIMES SINCE 12/18/2019, AND THE ENTIRE WIRING HARNESS WAS REPLACED AT THE THIRD VISIT. THE ISSUE STILL PERSISTS SO I WILL RETURN TO THE HONDA SERVICE DEPARTMENT AGAIN TOMORROW.
- NHTSA ID Number 11306906, February 4, 2020 (Incident Date February 3, 2020): WHILE DRIVING MY SPEAKERS BEGAN TO CRACK : YOU CAN'T LISTEN TO THE RADIO . AFTER A FEW MOMMENTS THE SCREEN TURNS BLACK ' NETWORK CONNECTION LOST ' GOES BLANK OR AUDIO TURNED OFF .

1 THEM GOES COMPLETELY BLANK . THEM THE SPEEDOMETER
2 WILL ALSO GO BLANK. THIS HAPPEN WHILE USING APPLE
3 CAR PLAY , GPS. AS WELL AS XMRADIO . I WAS ON CITY
4 ROADS THE FIRST TIME IT HAPPENED THEN HIGHWAY WERE
IT HAPPENED FREQUENTLY.

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- 6 • NHTSA ID Number 11308272, February 10, 2020 (Incident
7 Date December 20, 2019): I BEEN HAVING A LOT OF PROBLEMS
8 WITH THE 2020 HONDA PILOT BLACK EDITION THE BRAKE
9 ALERT ON THE DASH COMES ON OUT OF NO WHERE
10 WITHOUT ANYONE OR ANYTHING AROUND ME. THE
11 INFOTAINMENT, DASH AND SPEAKERS WITH SHOTTING OFF
12 N MAKING POPPING NOISES. THIS SUV I USE IT WITH MY
13 FAMILY AND THAT CAN CAUSE A REALLY NASTY ACCIDENT
14 BC ALL THAT HAPPENS ALL OF SUDDEN AND IS REALLY
SCARY. I HAD MY SUV ALREADY TWICE IN THE DEALER N
NOW IS GOING TO BE 3RD TIME. SOMETHING HAVE TO BE
DONE. THIS A 50K+ SUV AND DRIVING WITH A VEHICLE THAT
HAVE DOES TYPES OF ISSUES IS A BIG RISK ESPECIALLY
WITH OUR KIDS.
 - 15 • NHTSA ID Number 11309592, February 17, 2020 (Incident
16 Date February 16, 2020): PURCHASED 2020 HONDA PILOT
17 12/29/2019 OFF THE DEALER DISPLAY FLOOR. PILOT HAS LESS
18 THAN 1000 MILES. WHILE IN MOTION ON THE CITY STREETS
19 AND HIGHWAY, A CRACKING SOUND WILL OCCUR FROM THE
20 DASH BOARD AND THE SPEEDOMETER AND THE AUDIO
21 INFORMATION SCREEN WILL BLACK OUT UNABLE TO GAGE
22 ANYTHING. STILL IN MOTION THE SCREENS WILL UPLOAD,
23 BUT THE SCREENS WILL BLACKOUT AGAIN. THIS WILL
24 HAPPEN FOR SEVERAL MINUTES AT A TIME. THIS WAS
25 REPORTED TO THE DEALER AND WIFE IS HESITANT TO DRIVE
THE BRAND NEW PILOT. THE QUESTION BELOW IS
REQUESTING A DATE OF OCCURRENCE, BUT THIS IS
HAPPENING DAILY WHEN WE DRIVE THE PILOT. NEVER BEEN
IN AN ACCIDENT.
 - 26 • NHTSA ID Number 11310885, February 23, 2020 (Incident
27 Date February 22, 2020): AS I WAS DRIVING THE INFOTAINMENT
28 SYSTEM STARTED CRACKLING AND THEN THE MIDDLE
CONSOLE WENT BLACK INCLUDINV MY DASH MIDDLE WITH

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THE SPEEDOMETER NOT KNOWING HOW FAST I WAS GOING ALL INFO WENT BLANK AND IT KEPT HAPPENING

- NHTSA ID Number 11311955, February 27, 2020 (Incident Date February 12, 2020): WITH ONLY ABOUT 1200 MILES ON MY NEW 2020 HONDA PILOT, I STARTED TO HEAR LOUD POPPING AND CRACKLING SOUNDS COMING FROM MY SPEAKERS. ON THE FIRST TRIP TO THE DEALERSHIP THEY SAID THEY REPLACED THE AMP ON THE INFOTAINMENT SYSTEM. THAT LASTED FOR ABOUT 2 MILES, THEN IT STARTED TO DO IT AGAIN, THIS TIME WITH THE INFOTAINMENT SYSTEM LED SCREEN GOING BLACK FOR SEVERAL MINUTES THEN REBOOTING MULTIPLE TIMES BEFORE FINALLY COMING BACK ON. ON MY SECOND TRIP TO THE DEALERSHIP, THEY TOLD ME THAT THEY ADJUSTED THE WIRING HARNESS AND TIGHTENED A FEW SCREWS. THIS TEMPORARY FIX DID LAST ABOUT 4 WEEKS, BUT THE PROBLEM CAME BACK WITH A VENGEANCE. THIS TIME, IN ADDITION TO THE POPPING AND CRACKLING SOUNDS THAT ARE ANNOYING IN ITSELF, BOTH LED SCREENS, THE INFOTAINMENT ONE AND MY INSTRUMENT PANEL ONE ARE CONSTANTLY REBOOTING AND STAYING OUT FOR LONG PERIODS OF TIME EACH. IN ADDITION, THE SCREEN PANEL DOES FEEL HOT TO THE TOUCH NOW WHEN THIS HAPPENS. SO, ON MY THIRD TRIP TO THE DEALER WE DISCUSSED THIS AND THEY KEPT MY VEHICLE FOR A COUPLE DAYS SO THEY CAN LOOK IT OVER... WHEN I PICKED IT UP I WAS TOLD THAT THEY COULDN'T REPLICATE THE PROBLEM AFTER DRIVING IT FOR ABOUT 18 MILES OVER 2 DAYS. THEY ALSO INFORMED ME THAT THEY CONTACTED HONDA DIRECTLY AND WERE TOLD THAT THEIR ENGINEERS ARE AWARE OF THESE ISSUES BUT DON'T HAVE A "FIX" YET. SO A DAY AFTER LEAVING THE DEALERSHIP THE INSTRUMENT PANEL AS WELL AS THE INFOTAINMENT CENTER WENT BLACK/COMPLETELY OUT WHILE I WAS GOING DOWN A BUSY INTERSTATE. I COULD NOT TELL MY SPEED NOR ANY OTHER VEHICLE DATA AS THE INSTRUMENT PANEL WAS DEAD. WHILE THE INFOTAINMENT CENTER GOING OUT IS BAD, HAVING NO INSTRUMENT PANEL IS VERY DANGEROUS AND A MAJOR SAFETY CONCERN. I'M WORRIED THIS IS ONLY THE BEGINNING OF SOMETHING

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MORE SERIOUS WHICH IS GOING TO CAUSE A FATAL CRASH. THERE NEEDS TO BE A NATIONWIDE RECALL IMMEDIATELY!!

- NHTSA ID Number 11316327, March 15, 2020 (Incident Date February 8, 2020): WHILE DRIVING, CRACKLING AND POPPING STARTED COMING OUT OF SPEAKERS, EVEN WITH RADIO OFF. THE INFOTAINMENT SYSTEM THEN SAID "NETWORK SIGNAL LOST" AND THE DASHBOARD DISPLAY WITH THE SPEEDOMETER STARTED REBOOTING OVER AND OVER AGAIN UNTIL I SHUT THE CAR OFF AND TURNED IT BACK ON. THIS IS A SIGNIFICANT SAFETY ISSUE SINCE THE DISPLAYS GO BLANK, I CAN'T TELL HOW MUCH GAS I HAVE, THE REAR-VIEW CAMERA DOESN'T WORK AND I CAN'T TELL HOW FAST I'M GOING. THIS IS BEING REPORTED BY HUNDREDS OF PEOPLE ON VARIOUS SITES AND NEEDS TO BE INVESTIGATED AND A RECALL ISSUED IMMEDIATELY.
- NHTSA ID Number 11320996, April 13, 2020 (Incident Date April 6, 2020): LAST WEEK 4/8/2020, MY 2020 HONDA PILOT ELITE STARTING MAKING CRACKING NOISES THROUGH THE SPEAKERS WHILE DRIVING. A COUPLE OF SECONDS LATER THE ENTIRE RADIO, NAVIGATION, AND INFORMATION CENTER WITH SPEEDOMETER, GAS AND OTHER VITAL INFORMATION OF ENGINE SYSTEMS WENT BLACK. THE SYSTEM CAME UP AND STATED THAT IT WAS REBOOTING AND DID NOT HAVE DATA ACCESS. I CALLED THE DEALER AND THEY TOLD ME HOW TO CONDUCT A HARD REBOOT. I DID THIS AND IT WORKED FOR ABOUT 20 MINUTES AND THEN DID IT AGAIN. WHEN I CALLED THE HONDA DEALERSHIP BACK THEY STATED THAT HONDA WAS AWARE OF THE PROBLEM BUT DID NOT YET HAVE A SOFTWARE FIX FOR THE PROBLEM. DURING MY RESEARCH ON THE INTERNET, I HAVE FOUND THAT THIS IS A HUGE ISSUE WELL DOCUMENTED ON THE INTERNET FOR 2017 - 2019 MODEL PILOTS. IN FACT THERE IS A CLASS ACTION LAWSUIT FOR THOSE MODEL YEARS FOR THE SAME EXACT ISSUE. BUT NOW, HAVING BEEN TO THE NHTSA SITE, I SEE THAT IT IS ALSO AN ISSUE FOR NEW 2020 MODELS WITH VERY LOW MILEAGE. THIS IS A BIG PROBLEM AND NEEDS TO BE

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INVESTIGATED IMMEDIATELY AS EVERYTHING THAT THE DRIVER NEEDS TO SAFELY MONITOR THEIR DRIVING IS AFFECTED BY THIS PROBLEM AND VEHICLE OWNERS ARE NOT GETTING HELP FROM THEIR LOCAL HONDA DEALERSHIP SERVICE DEPARTMENTS. A NATIONAL RECALL FOR SAFETY NEEDS TO BE ISSUED RIGHT AWAY AND PRESSURE ON HONDA TO FIND A SOLUTION AND FIX SHOULD BE REQUIRED BY LAW! OUR LOCAL HONDA DEALERSHIP DID STATE THAT THERE APPEARS TO BE A PROBLEM WITH THE WIRING HARNESS, BUT IT ONLY TEMPORARILY FIXES THE ISSUE AFTER BEING REPLACED.

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

1 POPPING AND PICTURES OF EVERYTHING ELSE.
2 UNFORTUNATELY THE VIDEOS WILL NOT UPLOAD TO THIS
3 SAFETY COMPLAINT. EVIDENTLY THIS HAS BEEN GOING ON
4 SINCE 2017ISH. I WOULD HAVE NEVER PURCHASED THIS
5 PILOT IF I'D KNOWN THERE WERE ELECTRICAL ISSUES!!!!
6 WORSE \$41,000 CASH I HAVE EVER SPENT! SHAME ON HONDA
7 FOR NOT CORRECTING THE PROBLEM AND CONTINUING TO
8 SELL PROBLEM AUTOMOBILES TO CUSTOMERS! PLEASE
9 CONSIDER THESE ELECTRICAL PROBLEMS AS A DANGER. WE
10 NEED OUR AUTOMOBILES REPAIRED BY HONDA BEFORE
11 SOMETHING TERRIBLE HAPPENS ON THE HIGHWAYS! *TR

- 12 • NHTSA ID Number 11325097, May 19, 2020 (Incident Date May 18,
13 2020): PROBLEMS WITH THE COMPUTERS INCLUDING DASH
14 BOARD INFORMATION AND INFOTAINMENT SYSTEM.
15 PREVIOUSLY HEARD "POPPING NOISES" AND HAD
16 INTERMITTENT BLACK OUTS. I WENT TO START MY VEHICLE
17 AFTER WORK AND BOTH SCREENS WERE BLACK AND
18 WOULD NOT COME ON. THIS MEANS ALL FUNCTIONS OF
19 THESE TWO SCREENS ABSENT; I HAD NO SPEEDOMETER, NO
20 ODOMETER, NO LANE MITIGATION, NO SENSOR BRAKING, NO
21 CRUISE, NO RADIO, NO BLUE TOOTH, NO GPS, NO
22 MAINTENANCE LIGHTS'ETC. I HAD A GAS GAUGE AND A H/C
23 GAUGE THAT DID FUNCTION. *TR
- 24 • NHTSA ID Number 11325205, May 19, 2020 (Incident Date April 4,
25 2020): I JUST LEFT STAPLES AND CAR SPEAKERS WERE
26 POPPING A LOT. I'VE BEEN TRYING TO VIDEO THE PROBLEM
27 SO THAT HOPEFULLY HONDA WILL FIX THE PROBLEM.
28 ABOUT 3 MINUTES INTO THE RIDE, MY
NAVIGATION/RADIO/DVD SYSTEM SCREEN "LOST
CONNECTION" AND HAD TO RESTART. PAID \$41,000 CASH OCT
2019, AND THIS HAS BEEN AN ONGOING PROBLEM SINCE I
BOUGHT IT! SOOOOO FRUSTRATING AND I FEEL RIPPED OFF.
IN MARCH, THE SPEEDOMETER AND NAVIGATION SCREEN
WHEN OUT FOR SEVERAL DAYS. HONDA ACTS "SURPRISED"
AT PROBLEM. I CALL BS. *TR
- NHTSA ID Number 11325260, May 20, 2020 (Incident Date January 1,
2020): THE SPEAKERS WOULD EMIT CONSTANT
POPPING/CRACKING SOUNDS AND THE DASH/RADIO WOULD

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CONSTANTLY POWER CYCLE OFF AND BACK ON. *TR

- NHTSA ID Number 11326619, May 30, 2020 (Incident Date April 30, 2020): AFTER 2 MONTHS OF DRIVING A NEW 2020 PILOT ELITE, THE SPEAKERS STARTED POPPING LOUDLY AND CONTINUOUSLY EVEN WHEN THE AUDIO IS TURNED OFF. THE POPPING OCCURS SPORADICALLY AND TOUCH SCREEN REPORTS "NETWORK CONNECTION LOST" WHERE IT WILL NOT PLAY BLUETOOTH AUDIO OR AN FM RADIO STATION. THE POPPING OCCURS WHEN STOPPED AND WHEN MOVING. THIS POPPING IS EXTREMELY ANNOYING AND IT CANNOT BE STOPPED WHILE IT IS OCCURRING. *TR
- NHTSA ID Number 11327148, June 3, 2020 (Incident Date June 1, 2020): BRAND NEW HONDA PILOT 2020; 32 DAYS OFF THE LOT AND THE RADIO SCREEN GOES BLANK, THE SYSTEM SENDS A MESSAGE OF "NETWORK CONNECTION LOST" OR "NO AUDIO CONNECTION". THIS HAPPENS ACROSS AUDIO FEATURES; SIRIUS; AM; FM: BLUETOOTH AND APPLE CAR PLAY. WHEN THE RADIO IS WORKING THERE IS A CONSTANT CRACKLING SOUND ALMOST LIKE YOU ARE LISTENING TO A VINYL RECORD IN YOUR CAR. I GAVE THE BLANK SCREEN THE BENEFIT OF THE DOUBT THINKING IT WAS A ONE OFF BUT BY THE THIRD TIME THAT IT HAPPENED I BROUGHT IT TO THE DEALERSHIP. THEY CAN'T FIGURE OUT WHAT'S WRONG AND THEY HAVE TO KEEP CALLING CALIFORNIA FOR ADVICE. *TR
- NHTSA ID Number 11328061, June 9, 2020 (Incident Date March 15, 2020): I PURCHASED MY 2020 HONDA PILOT ON 12/9/2019. IT HAS BEEN 6 MONTHS AND EACH TIME WHILE DRIVING, I HEAR A LOUD, "CRACKLING" SOUND COMING FROM THE DASHBOARD, PRESUMABLY THE SPEAKERS. THIS HAPPENS EVEN WHEN THE AUDIO SYSTEM IS OFF. AT TIMES, WHEN THE RADIO IS PLAYING, IT WILL DISCONNECT AND IT SOUNDS LIKE AN ELECTRICAL SHORT. ALSO, THE DOOR LOCK BUTTON WHEN DEPRESSED MAKES A CRACKLING SOUND. THIS IS ALL EXTREMELY DISTRACTING WHILE DRIVING. *TR
- NHTSA ID Number 11328882, June 15, 2020 (Incident Date June 12,

1 2020): THERE IS A CRACKLING NOISE COMING OUT OF THE
2 SPEAKERS THAT BEGINS ONCE THE CAR IS PUT INTO
3 REVERSE OR DRIVE AND CONTINUES INTERMITTENTLY
4 WHILE DRIVING. THE CRACKLING NOISE IS EXACERBATED
5 WHEN MAKING TURNS. SOMETIMES THE RADIO LOSES
6 CONNECTION, AFTER WHICH THE ENTIRE DASH HAS
7 BLANKED OUT, LOSING ALL INFORMATION PERTAINING TO
8 ODOMETER AND MORE IMPORTANTLY, SPEEDOMETER. THIS
9 HAS OCCURRED WHILE THE VEHICLE WAS IN MOTION,
10 WHILE DRIVING IN A COMMUNITY. IT IS NOT ONLY A
11 DISTRACTION WHILE DRIVING TO LOSE THIS INFORMATION,
12 BUT ALSO A SAFETY THREAT TO NOT HAVE ANY INDICATION
13 OF YOUR SPEED WHILE DRIVING THE VEHICLE. THE
14 COMPONENT PART/SYSTEM OF CONCERN IS BELIEVED TO BE
15 WIRING/ELECTRICAL. AFTER TAKING IT INTO RALPH
16 SCHOMP HONDA TO HAVE IT DIAGNOSED TWICE, WE HAVE
17 BEEN TOLD 'THIS ISSUE IS CURRENTLY UNDER
18 INVESTIGATION AND CUSTOMER WILL BE CONTRACTED
19 ONCE A FIX BECOMES AVAILABLE.' APPARENTLY, THEY ARE
20 WAITING ON A TOOL TO COME IN FROM HONDA TO ALLOW
21 THEM TO RESOLVE THE ISSUE. IN THE MEANTIME, WE ARE
22 AWAITING RESOLUTION TO THIS ANNOYANCE THAT HAS
23 WORSENERED AND NOW BECOME A SAFELY HAZARD.
24 AMERICAN HONDA IS UNREACHABLE BY PHONE (1-800-999-
25 1009), AS THEY ARE CONTINUOUSLY EXPERIENCING
26 'TECHNICAL DIFFICULTIES' AND PROVIDE NO ALTERNATIVE
27 PHONE NUMBERS OR ALTERNATIVE SUGGESTED METHOD OF
28 COMMUNICATION. *TR

- NHTSA ID Number 11329921, June 21, 2020 (Incident Date June 20, 2020): IT FIRST STARTED A COUPLE WEEKS BEFORE THIS WITH A CRACKLING IN THE SPEAKERS. THEN IT WOULDN'T PLAY ANYTHING PLUGGED INTO THE USB. THEN ON THE 20TH IT WOULDN'T PLAY THE RADIO. IT WOULD SAY RADIO UNAVAILABLE. THEN WHEN TRYING TO ACCESS THE RADIO, IT WOULD SAY NETWORK COMMUNICATION LOST AND EVERYTHING WOULD GO BLACK. NO SPEEDOMETER, NO GAUGES, NOTHING. IT WOULD THEN RESTART THE SYSTEM. THEN THE BLUETOOTH STOPPED WORKING. NOW IT JUST CONSTANTLY LOSES NETWORK COMMUNICATION, BLANKS

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OUT AND RESTARTS. IT DID IT ABOUT 8 TIMES IN MY 10 MINUTE DRIVE HOME. I GOT A VIDEO OF IT WHILE SOMEONE ELSE WAS DRIVING BUT IT WON'T LET ME UPLOAD IT. IT HAPPENS AT ALL SPEEDS, EVEN BEING STOPPED AT A LIGHT.

- NHTSA ID Number 11330321, June 23, 2020 (Incident Date June 22, 2020): SAME PROBLEM AS I AM SEEING ON THIS WEBSITE. WHILE DRIVING, CRACKING AND POPPING NOISE FROM THE SPEAKERS, THEN THE ENTERTAINMENT SCREEN SHUTS OFF AND THERE IS A NOTICE SAYING NO CONNECTION, ALSO, THE SCREENS WHERE THE SPEEDOMETER, AND MILEAGE INFO SHUTS OFF COMPLETELY BLACK, THEN RESETS ITSELF. *TR
- NHTSA ID Number 11338731, July 11, 2020 (Incident Date July 11, 2020): ABOUT 30-40 MINUTES INTO DRIVING WHEN WE HIT A BUMP OR POTHOLE THE SPEEDOMETER AND INFOTAINMENT SCREEN FLICKERS SAYS TUNER LOST, THE AUDIO POPS SEVERELY LIKE SOMETHING HITTING THE WINDSHIELD. IT'S SCARY - LOOKS LIKE THE ELECTRICAL SYSTEM IS LOOSE
- NHTSA ID Number 11339028, July 13, 2020 (Incident Date July 1, 2020): TL* THE CONTACT OWNS A 2020 HONDA PILOT. THE CONTACT STATED THAT THE BACK-UP CAMERA AND DASHBOARD WARNING LIGHT FAILED TO OPERATOR CORRECTLY WHILE IN REVERSE OR IN MOTION, WITH AN ABNORMAL NOISE BEING HEARD. THE VEHICLE WAS TAKEN TO GERALD HONDA OF MATTESON (5505 AUTO CT, MATTESON, IL 60443) WHERE IT WAS DIAGNOSED AND DETERMINED THAT THE APPLE CAR PLAY SOFTWARE NEEDED TO BE UPDATED. THE VEHICLE WAS REPAIRED HOWEVER, THE FAILURE RECURRED. THE VEHICLE WAS TAKEN BACK TO THE SAME DEALER FOUR ADDITIONAL TIMES. THE MANUFACTURER WAS CONTACTED BUT NO FURTHER ASSISTANCE WAS PROVIDED. THE FAILURE MILEAGE WAS APPROXIMATELY 1,300.
- NHTSA ID Number 11339277, July 14, 2020 (Incident Date December 15, 2019): I BOUGHT A 2020 NEW HONDA PILOT ELITE ON OCTOBER 2, 2019 WITH 245 MILES ON IT. I BROUGHT MY PILOT ELITE INTO THE DEALERSHIP ON DECEMBER 26, 2019 AFTER

1 DISCOVERING A POPPING NOISE WHICH SOUNDED LIKE A
2 FIRECRACKER GOING OFF THAT SEEMED TO BE BETWEEN
3 THE WINDSHIELD AND DASH WHILE DRIVING. MILEAGE WAS
4 AT 3,956 AT THIS TIME. ON JANUARY 17, 2020, I BROUGHT MY
5 HONDA PILOT INTO THE DEALERSHIP AGAIN. IT DEVELOPED
6 A POPPING NOISE AGAIN BETWEEN THE WINDSHIELD AND
7 DASH SOUNDING LIKE A FIRECRACKER GOING OFF WHEN I
8 WAS DRIVING. ON FEBRUARY 5, 2020, THE HONDA PILOT WAS
9 ONCE AGAIN BROUGHT BACK IN. IT WAS POPPING AND
10 CRACKING THIS TIME IN THE AUDIO UNIT BUT NOW ALSO
11 DOOR LOCKS WE'RE MAKING NOISE WHEN IN STATIONARY
12 OR WHILE DRIVING. THE CONTROL PANEL HAD ALSO SHUT
13 OFF A COUPLE TIMES WHERE YOU ONLY SAW A DARK
14 SCREEN AND IT WOULD REBOOT. ON JULY 14TH, AFTER
15 HEARING THIS LOUD POPPING NOISE FOR A COUPLE MONTHS
16 NOW WHILE DRIVING, I HAVE TAKEN IT BACK TO THE
17 DEALERSHIP. IT IS WORSE WHEN YOU GO AROUND ANY TYPE
18 OF CURVES OR ON BUMPY ROADS. IF THE ROAD IS
19 COMPLETELY STRAIGHT AND SMOOTH, I DO NOT HAVE THIS
20 PROBLEM. THIS WHOLE ORDEAL IS SCARY BECAUSE IT IS A
21 HUGE DISTRACTION FOR ME AND I FEAR FOR MY SAFETY. I
22 HAVE BEEN TOLD BY THE SERVICE ADVISOR AGAIN TODAY
23 THAT HONDA IS AWARE AND WORKING ON THIS ISSUE. HE
24 STATED A RECALL IS COMING OUT FOR IT AS WELL AS THE
25 ODYSSEY AND PASSPORT BUT THEY ARE MAKING THE PARTS
26 FOR IT BEFORE THEY RECALL IT. HE SAID THEY CAN PUT A
27 BAND-AID ON IT IN THE MEANTIME UNTIL THE PART CAN BE
28 MADE. SINCE THIS IS THE 2ND TIME IN THE LAST 6 MONTHS I
HAVE BEEN TOLD THIS, I'M WORRIED THEY ARE COVERING
UP THE ISSUE AND WAITING FOR MY WARRANTY TO BE UP.
ALSO, THE SENSOR THAT TELLS YOU WHEN A VEHICLE OR
OBJECT IS CLOSE TO YOU IS FAULTY. I WILL BE DRIVING
WITH NOTHING AROUND ME AND IT TELLS ME TO BRAKE
AND GOES INTO ITS 'SAFETY MODE' WHICH HAS CAUSED ME
TO ALMOST HAVE A WRECK.

- NHTSA ID Number 11339959, July 17, 2020 (Incident Date May 12, 2020): MY INFOTAINMENT CENTER AND DASHBOARD SPEEDOMETER HAVE BEEN GOING OUT FOR THE PAST THREE MONTHS WHILE I DRIVE. LOOKING ONLINE THIS WAS AN

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ISSUE WITH THE 2019 MODELS AND NO SOLUTION TO THE PROBLEM WAS MADE. I WAS NOT INFORMED WHEN PURCHASING THE VEHICLE THAT THESE ISSUES EXISTED AND WHEN TAKING IT INTO THE DEALERSHIP NO LONG TERM FIX TO THE PROBLEM IS OFFERED. I PURCHASED THIS VEHICLE FOR THE NAVIGATION AND DVD OPTIONS THAT I NOW AM NOW ABLE TO USE YET I STILL PAY THE PAYMENT FOR THEM. TO ME HONDA IS NEGLIGENT BECAUSE THEY ARE AWARE OF THE PROBLEM YET THEY HAVE NOT FIXED IT WHEN I CALL ABOUT DOING ANYTHING TO IT I AM TOLD THEY HAVE TO EXPERIENCE THE PROBLEM WHILE DRIVING IT WHICH COULD TAKE SECONDS OR IT COULD TAKE A WEEK THEN THEY OFFER NO TIME TABLE ON HOW LONG IT WILL TAKE TO FIX IT. THEY ALSO DO NOT OFFER A COURTESY VEHICLE WHILE THEY FIX THE DEFECT. NO RECALLS HAVE BEEN ISSUED FOR THIS PROBLEM EITHER THIS PROBLEM CAN OCCUR ON ANY TYPE OF ROAD AT ANY TIME DRIVING OR PARKED. THE LAST TIME IT WAS ON WAS 7/12/2020 AND IT HAS BEEN OFF SINCE

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

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IS LOUD POPPING NOISES AROUND THE WINDSHIELD. THE NOISE SOUNDS LIKE ROCKS HITTING THE WINDSHIELD, BUT IT ENDS UP WITH INFOTAINMENT LOSING ALL COMMUNICATION AND DASH SOMETIMES GOING BLANK. THIS HAPPENED IN JANUARY 2020 WITH ABOUT 1000 MILES ON THE VEHICLE AND HAS HAPPENED ON/OFF OVER THE PAST FEW MONTHS. IN JULY IT HAS BEEN A DAILY OCCURANCE AND NO LONGER SAFE TO DRIVE.

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

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

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

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INFOTAINMENT SCREEN, AS WELL AS THE GAUGE CLUSTER (INCLUDING SPEEDOMETER, REAR BACK-UP CAMERA, ETC.) THEN BEGAN GOING COMPLETELY BLACK WHILE WE WERE DRIVING ON A COUNTY HIGHWAY, AND REBOOTED MULTIPLE TIMES. WE HAVEN'T EVEN MADE A PAYMENT YET ON THIS VEHICLE, AND IT HAS BEEN SITTING AT THE DEALER FOR REPAIRS FOR THE LAST WEEK. THEY ACKNOWLEDGE THAT IT IS A KNOWN PROBLEM, BUT THERE IS NO KNOWN PERMANENT FIX. I CANNOT STRESS ENOUGH WHAT A SAFETY ISSUE THIS IS. YES, THE POPPING IS INCREDIBLY ANNOYING, BUT IT'S TERRIFYING TO BE DRIVING AND HAVE NO SPEEDOMETER, WARNING LIGHTS, BACKUP CAMERA, ETC. HONDA CORPORATE NEEDS TO ACKNOWLEDGE THIS AND MAKE IT RIGHT BEFORE SOMEONE IS SERIOUSLY INJURED.

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

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CAUSE A VERY SERIOUS ACCIDENT. I PURCHASED THIS CAR FEELING THAT IT WOULD BE ONE OF THE SAFEST OPTIONS FOR TRANSPORTING MY FOUR CHILDREN. HOWEVER, I HAVE BECOME QUICK TO REALIZE THAT MAY NOT BE THE CASE. I WAS TOLD THAT THIS WAS A RECENT RECALL RELEASED BY HONDA AND THE DEALERSHIP WOULD REPAIR IT THIS MORNING. HOWEVER, I HAVE NOT BEEN ABLE TO FIND ANY TYPE OF RECALL ON THIS VEHICLE. I SEE THAT NUMEROUS PEOPLE HAVE THIS SAME COMPLAINT AND I FEEL THAT THIS SHOULD BE TAKEN CARE OF BEFORE SOMEONE BECOMES SERIOUSLY HURT.

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

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MILES ON THE CAR HONDA STILL HAVE NOT REPAIRED THE PROBLEM. WE HAVE PURCHASED 3 VEHICLES FROM HONDA BUT AFTER THIS, ITS OUR LAST. VERY UNHAPPY AND DISSATISFIED WITH HONDA AT THIS POINT.

- NHTSA ID Number 11344206, August 9, 2020 (Incident Date July 31, 2020): BOUGHT A 2020 HONDA PILOT EX-L IN ALBUQUERQUE FROM GARCIA HONDA IN MID JULY 2020. FIRST WEEKEND AFTER PURCHASE, I TOOK A 2 HR TRIP (ONE WAY) WITH MY WIFE AND KIDS (5YO AND 10MO). ON MY WAY BACK, I STARTED HEARING CRACKLING NOISE COMING FROM THE SPEAKERS, ALL WHILE LISTENING TO RADIO AND 'GOOGLE MAPS' DIRECTIONS. THE CRACKLING NOSE BECAME MORE SEVERE/PERSISTENT, THEN THE INFOTAINMENT SYSTEM SHUT OFF; FIRST DISPLAYING "NETWORK CONNECTION LOST", THEN OFF COMPLETELY. AT SOME POINT, AFTER THE CENTER INFOTAINMENT SYSTEM DISPLAY WENT OFF, THE INSTRUMENT CLUSTER ALSO SHUT OFF (ONLY DISPLAYED ENGINE TEMPERATURE AND GAS FILL LEVEL). YES, WITH MY KIDS STILL IN THE CAR... WHY WOULD HONDA KEEP ON SELLING VEHICLES THAT ARE KNOWN TO BE DEFECTIVE IN THIS WAY? VERY LIKELY PART OF THE REASON IS TO HELP JUST CONTINUE TO HELP THEMSELVES AND THEIR POCKET BOOKS, ALL AT THE EXPENSE OF MY KIDS' SAFETY. NICE GOING HONDA CORPORATES!! PLEASE LOOK AT YOUR KIDS THEN LOOK IN THE MIRROR AND THINK ABOUT WHAT YOU ARE DOING! IN THE PAST WEEKS SINCE THE VEHICLE PURCHASE, SEEMS I HAVE SPENT MORE TIME AT THE DEALER (3 TIMES, 4TH TIME SCHEDULED... AND THRESHOLD FOR 'LEMON' LAW) THAN WITH MY KIDS. THE SERVICE MANAGER (ANDREW NEUFELD) AND PERSONEL AT GARCIA HONDA ARE VERY ATTENTIVE BUT HAVE TOLD ME THAT THERE IS NOTHING THEY CAN DO TO FIX THIS ISSUE. SO I'M STUCK WITH A VEHICLE I DON'T DARE TO DRIVE WITH MY KIDS IN DUE TO SAFETY CONCERNS. I TEND TO BE LESS OPTIMISTIC THAN MOST BUT A FAIR CONCERN OF MINE IS THE FOLLOWING: HONDA DOES NOT KNOW WHAT CAUSES THE ISSUE, NOR CAN THEY FIX IT. DO THEY KNOW WHAT ALL IS REALLY AFFECTED? ARE OTHER SYSTEMS (OR SYSTEM OUTPUTS) IMPAIRED? WHAT CAN I EXPECT FROM

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LANE DEPARTURE AND FRONT COLLISION WARNING WHEN THE INFOTAINMENT SYSTEM AND INSTRUMENT CLUSTER DECIDE TO SHUT OFF? BACK UP CAMERA GOES OFF... A NO - NO WITH KIDS AROUND THE HOUSE!!!!!!!!!!!!!!!!!!!!!!!!!!!!

- NHTSA ID Number 11348660, August 11, 2020 (Incident Date August 11, 2020): POPPING, CRACKING EVEN IF RADIO OFF. SOMETIMES LIGHT PINGS LIKE ROCK HITTING WINDSHIELD SOMETIMES LOUD LONG STATIC SOUND. RADIO CUTS ODD AND ON. NAVIGATION SCREEN WILL CUT IN AND OUT AND GO BLANK (BLACK). SPEEDOMETER DIAL WILL REBOOT AND OR GO BLANK AND REBOOT. THIS IS ALL WHILE DRIVING THE CAR. I HAVE HAD THE REAR VIEW CAMERA NOT COME ON WHEN FIRST PUTTING IT INTO REVERSE TO BACK UP. IT DID COME ON AFTER PUTTING CAR INTO PARK AND THEN BACK INTO REVERSE. WE HAD RECALL WORK DONE YESTERDAY 8/10/20. 20-047 6MB002018-21 AND 20-051 6HR002019-20 PICKED CAR UP TODAY AND POPPING AND CRACKING NOT FIXED. HAD SERVICE TECH RIDE WITH ME AND HE HEARD IT AND ALSO WITNESSED THE RADIO/NAVIGATION SCREEN GO OUT. THE 'CLUSTER' DID NOT GO OUT DURING THIS TIME. UNSURE IF THE CLUSTER WILL GO OUT AGAIN BUT THE OTHER ISSUES ARE NOT FIXED. HE PUT IN A TICKET THAT STATES THEY ARE UNABLE TO FIX PROBLEM AT THIS TIME AS HONDA DOES NOT HAVE A FIX. THESE ISSUES OCCURRED ON HIGHWAYS, PARKING LOTS, STATIONARY IN DRIVEWAY.
- NHTSA ID Number 11348533, August 11, 2020 (Incident Date June 1, 2020): WHILE DRIVING THE DASH DISPLAY BLACKS OUT INTERMITTENTLY IN ADDITION TO A CONSTANT POPPING/CRACKING SOUNDS FROM THE INFOTAINMENT SYSTEM. THIS IS A KNOWN ISSUE WITH THE 2019-21 HONDA PILOTS IN ALL TRIM MODELS EXCEPT LX. THE SERVICE DEPARTMENT HAS ISSUED THE SERVICE TICKET TO WHAT NEEDS TO BE REPLACED BUT ARE ON A PARTS BACK ORDER UNTIL THE END OF SEPTEMBER. RECOMMENDED SOLUTION IS TO INSTALL/REPLACE THE FAKRA CONNECTOR SET AND MOST SERVICE CORDS ASSOCIATED THE MOST BUS NETWORK.

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- NHTSA ID Number 11348830, August 12, 2020 (Incident Date August 1, 2020): INFOTAINMENT SCREEN GOES BLANK, INSTRUMENT PANEL GOES BLANK, RADIO, LOOSE BACKUP CAMERA, RADIO, GPS. THE RADIO INTERMITTENTLY WORKS, AND HAS A STATIC OR CRACKING SOUND. THESE PROBLEMS OCCUR WHILE THE CAR IS IN MOTION, OR STATIONARY, WHILE IN THE CITY OR ON A HIGHWAY. I GET MESSAGES SUCH AS NETWORK COMMUNICATION LOST, NO AUDIO CONNECTION, CHECK TUNER. THERE HAVE BEEN OCCASIONS WHERE I LOST THE INSTRUMENT PANEL, AND DID NOT HAVE A SPEED INDICATOR, AND HAVE BEEN BACKING AND LOOSE MY BACKUP CAMERA. THIS LAST TIME I TOOK IT TO A DEALER, THEY PULLED IT OVER TO THE SIDE FOR OVER AN HOUR, THEN CAME TO THE WAITING ROOM AND TOLD ME THEY DIDN'T HAVE ANY PARTS TO REPAIR THE PROBLEM, AND DID NOT KNOW WHEN THEY COULD GET THE PARTS. IT WAS AS THOUGH THEY NEVER HEARD OF SUCH A PROBLEM. THE DEALERSHIP DID UPDATE THE GAUGE CONTROL MODULE SOFTWARE, BUT THE SAFETY PROBLEMS PERSIST. I HAVE VIDEO ON MY PHONE OF SOME OF THESE OCCURRENCES, AND CAN UPLOAD THE INVOICES I RECEIVED FROM THE DEALERSHIP.*DT*JB
- NHTSA ID Number 11349307, August 14, 2020 (Incident Date August 10, 2020): THE CENTER DASH INFOTAINMENT DISPLAY FOR BACKUP CAMERA AND OTHER FEATURES WENT DEAD (BLACK) WHILE DRIVING. THIS OCCURRED ON A NEW 2020 AWD HONDA PILOT TOURING PURCHASED IN DECEMBER OF 2019. AT APPROXIMATELY 1,000 MILES A LOUD INTERMITTENT "POPPING" BEGAN COMING FROM THE SPEAKERS. IT INCREASED IN FREQUENCY AND BECAME CONSTANT OVER TIME. A FEW DAYS AGO, AUGUST 10, 2020 WITH APPROXIMATELY 3,700 MILES ON THE VEHICLE, THE SOUND WAS AT IT'S WORST AND THE DASH CONSOLE SUDDENLY WENT OUT WHILE DRIVING. IT WOULD NOT COME BACK ON. I HAD TO BACK OUT OF A GROCERY STORE PARKING LOT WITHOUT ANY REAR VISIBILITY FROM A HIGH PROFILE VEHICLE WHICH FELT VERY UNSAFE.
- NHTSA ID Number 11349621, August 15, 2020 (Incident Date July 13,

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2020): WHILE DRIVING ON THE HIGHWAY THE INSTRUMENT PANEL, INCLUDING THE SPEEDOMETER AND ALL GAUGES, WENT BLACK AND THERE IS A HORRIBLE POPPING AND CRACKLING SOUND COMING FROM THE SPEAKERS. THE SOUND SYSTEM WAS COMPLETELY OFF WHEN THIS HAPPENED. THE DEALERSHIP HAD THE CAR FOR A WEEK TO "FIX" IT. ITS BEEN 3 1/2 WEEKS AND NOW ITS STARTED BACK UP AGAIN. THIS IS A NEW 2020 PILOT WITH 1060 MILES ON IT PURCHASED ON 6/24/2020

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

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FIRST TRIP TO THE DEALERSHIP FOR REPAIR, THEY SAID IT WAS CRIMPED WIRING BY THE FACTORY. THE "REPAIR" LASTED LESS THAN 2 WEEKS. THREE MONTHS LATER, TWO DIFFERENT DEALERSHIPS, 3 TIMES IN THE SHOP, AND THE PROBLEM STILL HAS NOT/CAN NOT BE FIXED. THE DEALERSHIP IS NOW TELLING ME THEY HAVE A TSB FOR THE POPPING/CRACKLING BUT THE PARTS ARE BACK ORDERED. WE'LL SEE. VERY DISAPPOINTED WITH HONDA ON THIS.

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

1 BUMPS OR GOING UP CURBS .CAR WAS TAKEN TO DEALER 8
2 25 2020 PICKED IT UP TODAY 8 26 2020 DROVE IT HOME
3 PULLED UP IN DRIVEWAY STARTED CRACKING TURNED
4 AROUND BROUGHT IT BACK .SERVICE DEPT SAID THEY
5 KNOW ITS A PROBLEM SERVICE CHIEF TECH SAID
6 SOMETHING ABOUT WIRING ISSUE.

- 7 • NHTSA ID Number 11359801, September 18, 2020 (Incident
8 Date October 15, 2019): NEARLY CONSTANT CRACKLE/POPPING
9 THROUGH SPEAKERS LARGELY RELATED TO BODY FLEXING.
10 THE ROUGHER THE ROAD SURFACE, THE MORE EVIDENT THE
11 NOISE BECOMES. CLEARLY A MECHANICAL ISSUE WITH
12 ELECTRICAL CONNECTIONS. A TEMPORARY IMPROVEMENT
13 MAY OCCUR AFTER APPLYING AN OPEN HAND SMACK TO
14 THE DASH SURFACE ABOVE THE INSTRUMENT CLUSTER.
15 POP/CRACKLE IS EVIDENT EVEN WITH THE SOUND SYSTEM
16 POWERED OFF. ADDITIONALLY, THE INSTRUMENT CLUSTER
17 COMPLETELY FAILS OCCASIONALLY AND THE VEHICLE
18 MUST BE TURNED OFF AND ON TO HAVE THE DISPLAY
19 RETURNED. VERY MUCH A SAFETY ISSUE! BASED ON MY
20 LONG EXPERIENCE IN THE ELECTRONICS INDUSTRY, THIS IS
21 SOME SORT OF GROUNDING OR CONNECTOR ISSUE'OR
22 POSSIBLY AN INTERMITTENT SHORT CIRCUIT (ALTHOUGH
23 NO FUSES HAVE BLOWN). THE ISSUE STARTED SOON AFTER
24 PURCHASE 10/2019 AND CONTINUES THROUGH TODAY,
25 9/18/2020.
- 26 • NHTSA ID Number 11361217, September 26, 2020 (Incident
27 Date September 24, 2020): THE REAR CAMERA FAILS AS A
28 RESULT OF THE CENTER CONSOLE (INFOTAINMENT SYSTEM)
SHORTING OUT. THIS ALSO CAUSES DISTRACTION WHILE
DRIVING. ADDITIONALLY, THERE IS A LOUND CRACKLING
AND POPPING NOISE FROM THE AUDIO SYSTEM WHICH IS
RELATED TO THIS ISSUE.
- NHTSA ID Number 11362203, October 1, 2020 (Incident Date October
1, 2020): 2020 HONDA PILOT TOURING HAS COMPLETE BLACK
OUT OF ALL ELECTRONICS AND THE DASH BOARD SINCE
PURCHASE REGARDLESS IF THE VEHICLE IS MOVING OR
STATIONARY. POPPING AND CRACKING CONSTANTLY
THROUGHOUT AND BEHIND DASH/WINDSHIELD

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REGARDLESS IF THE CAR IS STATIONARY OR MOVING. THERE IS NO WAY TO MEASURE ENGINE SPEED, FUEL, OIL PRESSURE, OR WHAT GEAR YOU ARE IN. TOTAL ELECTRICAL FAILURES ARE OCCURRING SINCE PURCHASE, AND THE DEALER HAS NO FIX FOR THE ISSUES, BUT DOES ACKNOWLEDGE ALL OF THESE SAFETY AND ELECTRICAL FAILURES ARE FACTORY BORN, AND HONDA HAS FAILED TO FIND OR PROVIDE A FIX. WITH ALL SYSTEMS FAILING, THE CAR IS NOT SAFE TO DRIVE. THE BRAKE SYSTEM WILL BRAKE WHEN YOU ARE TRAVELING SLOW OR AT HIGH SPEEDS, REGARDLESS OF THE FACT THAT NOTHING IS AROUND THE VEHICLE. THIS CAR SHOULD BE RECALLED AND RETURNED TO THE FACTORY BEFORE MORE PEOPLE ARE KILLED OR INJURED. THE CURRENT RECALLS DO NOT FIX ANY OF THE ELECTRICAL SAFETY ISSUES. THESE CARS REQUIRE A TOTAL REWIRE OF FAULTY HARNESS WIRING WHICH IS A FIBER OPTIC DEFECT FROM THE FACTORY, THEREFORE, SOFTWARE UPDATES DO NOT AND WILL NOT FIX THESE SAFETY ISSUES. ALL OF THESE VEHICLES REQUIRE A TOTAL REWIRE. HONDA SHOULD BE ASHAMED OF THEMSELVES FOR ALLOWING CONSUMERS TO CONTINUE DRIVING THESE DEATH TRAPS!.

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

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WERE NOW AWARE OF PROBLEM IN OTHER VEHICLES. TOLD ME NEEDED NEW WIRING HARNESS. THEY KEPT CAR FOR A WEEK AND REPLACED WIRE HARNESS. VEHICLE WAS FINE FOR ABOUT TWO MONTHS THEN PROBLEMS ALL CAME BACK. SCREENS ALL WENT BLACK REPEATEDLY WHILE DRIVING, OR STATIONARY. IT DIDN'T MATTER CONDITIONS BUT ALL ELECTRONIC SYSTEMS WOULD CONTINUOUSLY SHUT DOWN AND REBOOT. A COUPLE WEEKS AGO EVERYTHING WENT BLACK AND HAS REMAINED OFF. VEHICLE IS NOW BACK AT DEALER FOR THE THIRD TIME TO TRY AND FIX PROBLEMS. THEY TOLD ME THERE ARE RECALLS FOR THE BACK UP CAMERA AND SPEEDOMETER PORTION. AND TRIED TO TELL ME THERE MUST BE A LINK IN THE WIRES SOMEWHERE THAT THEY NEED TO LOCATE. OBVIOUSLY HONDA MUST BE AWARE OF THIS PROBLEM AS THERE ARE HUNDREDS OF POSTS ONLINE ABOUT THE IDENTICAL PROBLEMS IN OTHER 2020 HONDA PILOTS. IT IS NOT SAFE TO DRIVE THE VEHICLE WITHOUT ANY SPEEDOMETER OR INFORMATION SYSTEMS FUNCTIONING.

- NHTSA ID Number 11366203, October 24, 2020 (Incident Date October 22, 2020): I WAS DRIVING ON THE FREEWAY AND MY WHOLE INSTRUMENT PANEL WHERE MY SPEEDOMETER IS AND APPS ECT ARE TURNED BLACK WHERE I COULDN'T EVEN SEE HOW FAST I WAS GOING , BUT BEFORE THAT HAPPENED MY STEREO WAS CRACKLING AND CUTTING OUT AND THEN BLACKED OUT AS WELL AND THEN CAME BACK ON AGAIN. I HAVE IT RECORDED FOR MY RECORDS. THEN WHEN I WAS ON MY WAY HOME FROM WHAT THEY SAID AT THE DEALERSHIP WHICH WOULD FIX THE DASH WAS A RECALL ON THE VEHICLE BUT AS SOON AS I CAME IN MY CAR THERE WAS AN UPDATE ON THE DASH OF MY STEREO, WAS STILL CUTTING IN AND OUT AND I COULDN'T USE MY BLUETOOTH LIKE I SHOULD BE ABLE TO OR LISTEN TO MY RADIO THROUGH THE INTERNET OR JUST REGULAR FM RADIO. I ONLY HAVE 3800 MILES ON MY VEHICLE AND HAVE HAD MY VEHICLE FOR JUST SHY OF 5 MONTHS. IT'S RIDICULOUS TO SPEND 40K FOR A VEHICLE THAT DOESN'T EVEN WORK PROPERLY. ALSO BEFORE PURCHASING THE VEHICLE I ASKED THE SALESMAN AT TRACY HONDA WHO THEN ASKED

1 HIS SALES MANAGER MY QUESTION IF THERE WERE STEREO
2 PROBLEMS IN THE VEHICLE I WAS BUYING LIKE THE ONES
3 I'VE BEEN READING ABOUT AND RESEARCHING AND THEY
4 TOLD ME NO IT WAS A MODEL ABOVE MINE AND THEY
5 HADN'T HEARD OF IT AT FIRST. I ALSO ASKED ABOUT THE
6 DASH TURNING BLACK AND THEY RESPONDED WITH THE
7 SAME THING. SO TECHNICALLY THEY SOLD ME A VEHICLE
8 WITH A RECALL AND LIED ABOUT THE THINGS THAT WERE
9 WRONG WITH THE VEHICLE BEFORE I EVEN BOUGHT IT. IT
10 SHOULD HAVE BEEN SOLD TO ME AS A USED VEHICLE DUE
11 TO THE RECALLS ALREADY ON THE VEHICLE BEFORE I
12 PURCHASED. WHEN I TOOK MY PILOT IN FOR MY RECALL
13 THE SERVICE GUY SAID THAT HIS 2019 CIVIC DOES THE SAME
14 THING AND HE JUST LIVES WITH IT AND THAT'S KIND OF
15 PATHETIC ESPECIALLY WHEN YOU ACTUALLY WORK AT A
16 HONDA DEALERSHIP DO YOU STILL HAVE VEHICLES AND
17 CAN'T EVEN HAVE A STEREO THAT WORKS IN A CAR
18 SOMETHING SO BASIC.

- 14 • NHTSA ID Number 11372786, November 2, 2020 (Incident
15 Date October 30, 2020): AFTER HAVING KNOWN RECALL ISSUE
16 REPAIRED, ELECTRICAL/SOUND SYSTEM STILL CONTINUES
17 WITH AGGRESSIVELY LOUD CRACKING AND POPPING
18 NOISES. THE NOISES AT TIMES ARE OUT OF THE BLUE,
19 CAUSING THE DRIVER AND PASSENGERS TO BE STARTLED.
20 THE INSTRUMENT PANEL WILL FREEZE UP AND BLUE
21 TOOTH/VOICE ACTIVATED FEATURES WILL STOP
22 FUNCTIONING. THESE ISSUES OCCUR WHEN THE CAR IS
23 MOVING OR STATIONARY. NO IMPROVEMENT AFTER THE
24 RECALL REPROGRAMMING WAS COMPLETED DESPITE BEING
25 TOLD BY THE SERVICE TECHNICIAN IT WOULD RESOLVE THE
26 ISSUE.
- 27 • NHTSA ID Number 11372846, November 3, 2020 (Incident
28 Date October 31, 2020): 2020 HONDA PILOT TOURING 1,156 MILES
- 3 MONTHS OLD. VEHICLE BEGAN TO STALL WHEN PULLING
INTO GARAGE AND APPLYING BREAKS. LOUD SOUNDS
COMING THROUGH SPEAKERS AS IF YOU'RE DRIVING
THROUGH HAIL. TUNER LOST, NETWORK CONNECTION
FAILED, DASHBOARD BLACK. VEHICLE CAN ALSO APPLY

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BREAKS WHEN NO OTHER CAR IS AROUND. LATEST SYSTEM FAILURE CAR STALLED WHEN APPLYING BREAKS AT AN INTERSECTION. ALSO DRIVER PASSENGER MIRRORS INDEPENDENTLY MOVE WHILE DRIVING. SOFTWARE UPDATE TO CONTROL BOX AND GAUGE CONTROL MODULE WITHOUT FIX. NOW TIGHTENED WIRES BEHIND BLU-RAY PLAYER. SENSING/BREAK ISSUES ARE UNKNOWN TO HONDA AND HAVE NOT BEEN FIXED.

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

1 12/30/2019 IN FRESNO, CA. RECENTLY THIS MONTH
2 DECEMBER 2020, I STARTED HEARING A CRACKING AND
3 POPPING NOISE FROM THE SPEAKERS. THE POPPING NOISE
4 HAPPENS WHETHER OR NOT MUSIC IS ON. I ALSO STARTED
5 HEARING THIS WEIRD NOISE THAT ALMOST SOUNDED LIKE
6 THERE WAS A COMPRESSOR IN MY VEHICLE. I DID SOME
7 RESEARCH ON SEVERAL HONDA PILOT THREADS AND IT
8 SEEMS TO BE THE AC COMPRESSOR AND THE SPEAKERS.
9 APPARENTLY THE WIRING HARNESS NEEDS TO BE CHANGED.
10 I'VE LOOKED OVER THE NHTSA WEBSITE AND SEEN
11 MULTIPLE COMPLAINTS REGARDING THE SPEAKERS
12 POPPING ISSUE. I HAVE NOT TAKEN MY VEHICLE TO THE
13 DEALER YET, I DONT COMPLETELY TRUST DEALERSHIP
14 SERVICE CENTERS AND THEY PREY ON CUSTOMERS AND
15 OVER CHARGE AND MAKE YOU THINK THERE'S OTHER
16 THINGS WRONG WITH THE VEHICLE. I LIKE TO DO MY
17 RESEARCH PRIOR TO TAKING MY CARS TO ANY REPAIR
18 SHOPS. I ALSO VIDEO AND VOICE RECORDED ALL THE WEIRD
19 SOUNDS THAT THE PILOT IS MAKING. HONDA NEEDS TO FIX
20 THIS, IF THIS IN FACT IS A WIRING ISSUE, THIS CAN POSSIBLY
21 CAUSE A SHORT OUT THUS A SAFETY ISSUE. I WILL BE
22 PRINTING OUT SEVERAL OF THESE COMPLAINTS AND
23 SHOWING THEM TO THE DEALER BEFORE THEY TRY TO
24 SWINDLE ME OUT OF AN EXCESS AMOUNT OF MONEY.
25 ALTHOUGH SINCE IT HASN'T EVEN BEEN A YEAR MY
26 VEHICLE SHOULD BE UNDER WARRANTY.

- 20 • NHTSA ID Number 11384709, December 23, 2020 (Incident
21 Date September 10, 2020): RANDOM POPPING NOISE, LIKE SOUND
22 OF SMALL ROCKS HITTING WINDSCREEN. OCCASIONALLY
23 THE DISPLAY WHERE SPEEDOMETER IS GOES OUT. AUDIO
24 PROBLEMS WITH RANDOM VOLUME ISSUES. POPPING NOISE
25 OCCURS WHETHER AUDIO SYSTEM IS ON OR OFF. NOTICE IT
26 MORE WHILE IN MOTION AND GOING OVER BUMPY ROAD.
27 BEEN TO DEALER 5 TIMES AND REPLACED WIRING, AMP,
28 HEAD UNIT, AND STILL HAVE ISSUE.
- NHTSA ID Number 11399810, March 8, 2021 (Incident Date March 6,
2021): SPEAKERS MAKE CRACKLING NOISE WHILE PLAYING
DVD/BLURAY. GETS LOUDER AND MORE FREQUENT UNTIL

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ALL AUDIO EVENTUALLY STOPS.

- NHTSA ID Number 11402976, March 15, 2021 (Incident Date February 12, 2021): I'M WRITING TO INFORM YOU OF A SEVERE SAFETY ISSUE THAT OCCURRED WITH OUR 2020 HONDA PILOT TOURING EDITION. MY FAMILY AND I WERE DRIVING ON THE HIGHWAY AT ABOUT 70 MPH WHEN ALL OF A SUDDEN THE CAR WOULDN'T ACCELERATE AND IN FACT LOST POWER. THE ENGINE LIGHT WAS FLASHING AND WE WERE FORTUNATE TO HAVE AN EXIT RAMP CLOSE AND WE COASTED OFF ON THE EXIT RAMP LIMITED TO 5 MPH. ALL ELECTRONICS WERE ON (RADIO AND DVD), BUT THE CAR FORCED US TO A STOP. WE CALLED THE HONDA SERVICE LINE BECAUSE THIS CAR IS STILL UNDER WARRANTY. THEY INFORMED US NOT TO DRIVE THE CAR AT THIS TIME WITH THE ENGINE LIGHT ON. WE SAT IN THE CAR WITH THE ENGINE LIGHT ON AND PULLED OVER FOR APPROXIMATELY 20 MINUTES. THEY RECOMMENDED TURNING THE CAR OFF FOR 10 MINUTES, LIKE MANUAL SAID, AND THEN RESTART THE CAR TO SEE IF WE CAN DRIVE TO SAFETY. WE DID THIS AND THE ENGINE LIGHT WAS OFF AND WE WERE ABLE TO DRIVE TO A SAFE LOCATION. 100+ MILES AWAY FROM OUR HOME, WE TOOK IT TO A HONDA DEALER. THEY DID AN INSPECTION OF THE CAR AND ATTEMPTED TO READ THE SYSTEM TO FIND OUT WHY THE ENGINE LIGHT CAME ON. THEY WROTE UP A DETAILED REPORT AND SAID THAT THE ENGINE LIGHT MAY NOT HAVE BEEN ON LONG ENOUGH TO GET A READ/REPORT, BUT EVERYTHING ELSE LOOKED OK. THEY DID WRITE IN THEIR REPORT THAT THERE IS A KNOWN BULLETIN FOR A FUEL INJECTION PROBLEM. THEY SAID THEY RECOMMENDED IT, BUT THAT THE ENGINE LIGHT WOULD NEED TO BE ON LONGER TO JUSTIFY RECALL. AND LASTLY, I WANT YOU TO BE AWARE THAT THIS CAR, SINCE PURCHASING NEW, HAS BEEN IN THE SHOP OR NOT CORRECTLY WORKING FOR 4+ MONTH OF THE YEAR WE HAVE OWNED IT. THE DVD PLAYER, INFORMATION ELECTRONIC SCREEN SYSTEM BROKE AND NEEDED REPLACED. ADDITIONALLY, WE HAD LOUD CRACKING AND POPPING NOISE AND IT REQUIRED A CABLE WITH PROPER SHIELDING TO BE REPLACED.

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- NHTSA ID Number 11405195, March 28, 2021 (Incident Date March 16, 2021): THIS VEHICLE HAS BEEN NOTHING BUT PROBLEMS SINCE DAY 1. IT BEGAN WITH THE SUNROOF LEAKING AND CAUSING PUDDLES IN THE FRONT AND REAR PASSENGER FLOORS. THAT ISSUE REQUIRED 4 TRIPS TO THE DEALER. THE SPEAKERS THEN BEGAN POPPING AND THE RADIO AND DASH WOULD COMPLETELY SHUT OFF WHILE DRIVING. FIXING THAT HAS BEEN ATTEMPTED 5 TIMES AND THE RADIO STILL CONTINUES TO HAVE PROBLEMS. I HAVE ALSO EXPERIENCED FALSE CRASH SENSING AND ONCE, THE AUTO BRAKING SYSTEM MADE ME COME TO ALMOST A COMPLETE STOP WHILE GOING ABOUT 45MPH AND NO ONE WAS EVEN AROUND ME. THIS CAR HAS BEEN A PROBLEM AND IS NOW BECOMING A HUGE SAFETY CONCERN AS MY WIFE WHO REGULARLY DRIVES IT IS NOW PREGNANT. SHE IS SCARED TO DRIVE IT AND HONDA IS UNWILLING TO HELP SOLVE THE ISSUES.
- NHTSA ID Number 11408535, April 17, 2021 (Incident Date January 27, 2021): MY 2020 PILOT HAS SEVERAL ISSUES. 1. THE DASHBOARD AND INFOTAINMENT SYSTEM BLACKOUT. IN SEPT 2020, HONDA REPLACED THE MOST MODULE AND SAID THIS WOULD FIX THE PROBLEM. SEVERAL WEEKS AGO, MY INFOTAINMENT SYSTEM AGAIN WENT BLANK (3/6/2021), I HAD NO BACK UP CAMERA OR INFORMATION. THIS FIX OBVIOUSLY DID NOT WORK. I TOOK VIDEO ON MY PHONE. I TOOK THE VEHICLE TO HONDA, THEY WOULD NOT LOOK AT MY VIDEO AND SAID THAT THEY NEEDED TO RECREATE IT (3/26/21). THEY DID NOTHING. I ALSO GOT THE FOLLOWING MESSAGE SEVERAL DAYS LATER (3/12/21), "UNFORTUNATELY, COM.HONDA.TELEPHONYSERVICE HAS STOPPED." I ALSO SHOWED THIS TO THE HONDA SERVICE CENTER, THEY SAID INTERESTING, WE HAVE NEVER SEEN THAT. THEY DID NOT WANT MY PICTURE, AND COULD NOT RECREATE, SO THEY DID NOTHING. THE CRACKLING/POPPING NOISE IS ALSO BACK AFTER IT WAS SUPPOSED TO BE FIXED, WITH THE HONDA REPAIR. THEY COULD NOT RECREATE THIS EITHER, SO THEY DID NOTHING. 2. I HAVE ISSUES WITH THE FORWARD COLLISION BRAKING, AUTO SENSING. I LIVE IN A RURAL AREA AND WHEN

1 DRIVING ON TWO LANE ROADS, HEAD ON TO THE OTHER
2 TRAFFIC THE VEHICLE CONSTANTLY BRAKES. WHEN
3 DRIVING OVER TWO LANE BRIDGES, WHICH I DO OFTEN, IT
4 BRAKES SEVERAL TIMES A TRIP TRYING TO GET OVER THE
5 BRIDGE. THIS IS NOT SAFE. ONE TIME I WAS ON 66 IN VA
6 (1/27/21), AT NIGHT, AN 18 WHEELER WAS COMING OFF AN
7 EXIT RAMP, I WAS IN THE RIGHT LANE. THE VEHICLE
8 SLAMMED ON THE BRAKES AND DROPPED MY SPEED
9 APPROXIMATELY 20-25 MPH FOR NO REASON. THE 18
10 WHEELER WAS STILL ON THE EXIT RAMP. I WAS ALMOST
11 REAR ENDED BY THE VEHICLE BEHIND ME. THE BRAKE
12 SENSING IT TOO SENSITIVE. I HAVE TAKEN IT IN FOR THIS,
13 THEY COULD NOT RECREATE AND TOLD ME TO TURN IT OFF.
14 THAT IS NOT AN ANSWER. IF A VEHICLE HAS SAFETY
15 OPTIONS, WE SHOULD BE ABLE TO USE THEM AND NOT BE
16 TOLD TO TURN THEM OFF! THE 2020 PILOT HAS A LOT OF
17 ISSUES THAT ARE NOT BEING FIXED. THIS VEHICLE SHOULD
18 BE TAKEN OFF THE ROAD.

- 14 • NHTSA ID Number 11417803, May 19, 2021 (Incident Date April 7,
15 2020): On April 4.7.2020 I visited The Honda Dealer to report my
16 dashboard and control console shutting off while driving. On 4.14.2020 I
17 again visited the Honda Dealer to report a problem related to the same
18 issue since it was not repaired. On 5.4.2020 I emailed the asst service
19 manager about the backup camera going black/off. On 4.21.2021 I
20 returned to the Honda Dealer again for the entire control display/camera
21 display shutting off and crackling from the audio system. The dealer is
22 not writing my concerns when the vehicle is inspected, I believe to deny
23 the issue and avoid lemon law.
- 24 • NHTSA ID Number 11429213, August 16, 2021 (Incident Date May 1,
25 2021): When vehicle is on, in drive-braked-or parked status, an
26 incremental sound of electrical crackling and popping increasingly
27 develops both in noise level and intensity, and emits throughout the
28 vehicle. Culmination of this erratic electrical activity results in a loud
chromatic/bursting "crack" sound and shutdown of the audio system.
Component - appears to be in the wiring harness and electrical system
connections. Safety Issue - total distraction to driver's attention,
disturbing, and alarming concern to passengers. Problem Confirmed or
Reproduced - Yes. Diagnostic errors captured and recorded on multiple

1 occasions, with shutdown randomly occurring. Warning and Appearance
2 - No warning or apparent related catalyst is evident. First occurrence at
3 7,000 miles and continues.

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- 5 • NHTSA ID Number 11429638, August 18, 2021 (Incident Date October
6 9, 2020): I have been dealing with the issue of my stereo crackling for
7 over a year. The first appt is listed below. I have taken my car in 4
8 different times for this issue and am still as of today waiting on the part
9 to come in to fix my car. I had an appt today and was told that the part
10 was in and after dropping off my car was told the part is not in stock and
11 they don't know when it is coming in. This is a dangerous and unsafe
12 driving situation. The navigation turns off, the radio completely shuts off
13 including my dashboard so I don't know how fast I am going. The
14 crackling noise continues if the car is on or off. This is very distracting
15 and loud especially since you cannot control the level of the noise. I think
16 waiting a year for this to be resolved has been long enough and I expect
17 the dealership to step in and provide some options.
 - 18 • NHTSA ID Number 11436007, October 8, 2021 (Incident
19 Date September 24, 2021): I'm reaching out to you because I have no
20 options and am completely frustrated. After looking into it (simple
21 google search), I know I'm not alone. There appears to be hundreds (or
22 thousands) of 2020 and other year Honda Pilots where the Infotainment
23 system is failing. It begins with "pops" & "crackles" and just keeps
24 getting worse. Also, intermittently, you will get error messages or a blank
25 screen which could be dangerous. The problem comes and goes which
26 makes it even more frustrating. I have personally taken my 2020 Pilot
27 Elite (MSRP near \$50,000) into my local Honda dealer 4 times already.
28 Ten days after the most recent "repair" it has started all over again. In the
past they have admitted they really don't know how to fix it and just keep
replacing harnessing and wiring. They want me to bring it in AGAIN for
a 5th time. Why should I bring it in when they clearly have no fix? The
Pilot was purchased from Shottenkirk Honda (Cartersville, GA) in May
2020 and currently has around 30,000 miles on it. . My father lives in
another state and he asked his local Honda dealer if they knew of the
issue. They quickly admitted they did and again, admitted they don't
know how to remedy it. If you do any simple research you will see it over
and over. You can start with this simple Google search: honda pilot
infotainment problems. As I said, I haven't found anyone who states it's
been fixed permanently. I do appreciate the efforts and kindness of my

1 local dealership (Shottenkirk) but at what point will Honda step up and
2 do something of substance to fix the issue or replace the vehicles? This,
3 in my opinion, is not a "Shottenkirk" problem, it is a "Honda" problem. I
4 have tweeted Honda North America and Honda Customer Service and
5 simply got a reply that says they've created a file and will look into it.

- 6 • NHTSA ID Number 11444494, December 20, 2021 (Incident Date April
7 17, 2021): My vehicle was recalled twice before 2,500 miles for wiring
8 harness connector issues (snapping, popping, crackling). I was told I
9 could lose visibility with all dash functions, navigation, radio, etc. After
10 the first and second recall service fix I continued to experience the same
11 symptoms. I opened a case with Honda in June, 2021, and notified my
12 local dealer. The Honda case number is 12314702. I have heard nothing
13 from either Honda and my local dealer, and I am concerned nothing is
14 being done on this issue and I will lose visibility of my dash at some
15 point, putting myself and family in danger.
- 16 • NHTSA ID Number 11445959, January 3, 2022 (Incident Date August
17 25, 2021): Head unit has supposedly been "fixed" already, still losing all
18 electronics, black out screen, loud and startling popping noises. Been
19 asking Honda to fix for months, assigned a case, they just do not seem to
20 care and now vehicle is undrivable due to loud, startling sound that may
21 cause an accident, as well as not knowing if any of the safety electronics
22 are working or not. It almost sounds like shorting out and that means
23 possibility of electrical fire. Honda is dragging their feet doing
24 ANYTHING on this obviously as this has been going on for months.
- 25 • NHTSA ID Number 11449070, January 27, 2022 (Incident Date January
26 26, 2022): Since new, the audio/navigation system has repeatedly turned
27 off and on, had crackling noises emitted from the speakers and issues
28 system warnings. I retuned my first Pilot for the same issues and now this
Pilot is demonstrating the same issues. I have had the vehicle at the
dealer several times and they just say that it's common with this vehicle
model and the Passport with navigation systems. HONDA national
service does not return calls and this issue is noted on many HONDA
forums. This condition is unacceptable and dangerous.
- NHTSA ID Number 11449245, January 28, 2022 (Incident
Date December 27, 2021): I was driving and a LOUD cracking popping
noise started coming from the dash. The stereo went dead and the
instrument panel went dead. I was startled at the noise and almost lost

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control of the car. I can't see my speed or other functions of the car. Honda has no permanent fix for this.

- NHTSA ID Number 11452259, February 16, 2022 (Incident Date February 9, 2022): The infotainment system makes a popping/crackling sound. The dash display and infotainment display flickers on and off at times. This condition makes impedes the use of the the user controls and feedback systems. The vehicle went in for service on October 15, 2021 to have a technical service bulletin update implemented. The vehicle started exhibiting the issue again on February 9, 2022 in a much more extreme and severe way. It went back for service on February 15, 2022 to have the original work "inspected". The dealer said everything was fine and did nothing. Honda as implemented a couple of Technical Service Bulletins, but no permanent fix has been implemented. The dealer mentioned that they apply this TSB to approximately 2 Pilots per day.

2021 Honda Pilot:

- NHTSA ID Number 11374713, November 15, 2020 (Incident Date November 14, 2020): WHILE DRIVING FOR ABOUT AN HOUR ON THE FREEWAY THE SOUND TO MY BLUETOOTH AUDIO QUIT. THEN THE APPLE CARPLAY WOULD NOT CONNECT. WHEN I GOT TO THE GROCERY STORE TRYIN TO MANEAVER INTO A PARKING SPOT THE BACKUP CAMERA DID NOT WORK WHEN I PUT IN REVERSE. AT FIRST I THOUGHT I HAD PRESSED PARK INSTEAD OF REVERSE BUT THAT WAS NOT THE CASE. NOT UNTIL I PARKED, SHUT THE VEHICLE OFF AND RESTARTED IT DID EVERYTHING START WORKING PROPERLY (AT LEAST FOR NOW). THE VEHICLE HAS APPROXIMATELY 1500 MILES ON IT. I HAVE BEEN READING ABOUT A RECALL ON NEWER PILOTS (Y7Y) AND WAS WONDERING WHY MY VEHICLE IS NOT INCLUDED SINCE I AM EXPERIENCING THE SAME ISSUE. I MENTION ALSO THAT TWICE AT ABOUT 500 MILES I EXPERIENCED THE CRACKLING NOISE IN THE AUDIO THAT HAS BEEN A PROBLEM WITH THE 2018 AND NEWER PILOTS.
- NHTSA ID Number 11422110, June 24, 2021 (Incident Date April 1, 2021): The dash crackles sometimes a little and other times it crackles constantly all across the dash. If the radio is playing, it interferes with the

1 radio or using the Bluetooth. At first it seemed like something hit the
 2 windshield and now it's worse and crackles all the time. There was a
 3 recall on this recently but not for the 2021 Pilot. This needs to be fixed. It
 4 is quite distracting and annoying.

- 5 • NHTSA ID Number 11432031, September 7, 2021 (Incident Date July
 6 30, 2021): Loud popping and crackling noise emitting from speakers.
 7 Cannot turn them off, and causes major interruptions in navigation, radio,
 8 entertainment. Dealer said Falkra wiring is faulty, but is back-ordered,
 9 and could not even give us an estimate of when it would arrive.
 10 Essentially told us to suck it up, but it is more than distracting (my
 11 daughter actually said it gives her a headache) and I'm worried about
 12 larger (safety) issues if the wiring is indeed faulty. What if my other
 13 electrical systems malfunction as well?
- 14 • NHTSA ID Number 11452304, February 16, 2022 (Incident
 15 Date December 14, 2021): Our Pilot is brand new - we started noticing
 16 popping and cracking sounds from the dashboard. It is pretty loud. We
 17 thought it was possibly the radio but it continues with the radio off. We
 18 thought it was the dashboard contracting/expanding but it happens in all
 19 weather. It has become increasing loud and consistent and now any
 20 sounds from the stereo, regardless of input, skip and glitch and we turn it
 21 off and the popping and cracking sound continues seemingly from the
 22 speakers. We took it to the dealership for repair but they said they can't
 23 repair it. This is not acceptable for a new car.

24 ***2019 Honda Passport:***

- 25 • NHTSA ID Number 11230644, July 10, 2019 (Incident Date July 9,
 26 2019): NOTE. ALL HAS TAKEN PLACE WHILE IN MOTION
 27 EXCEPT FOR THE RESTART. STARTED WITH INTERMITTENT
 28 SPEAKER CRACKLES. YESTERDAY CRACKLES WITH RADIO
 ON REOCCURRING CRACKLES FOLLED BY INFOTAINMENT
 SCREEN NOTING RADIO SIGNAL LOSS FOLLED BY DATA
 COMMUNICATIONS LOSS. (PARAPHRASING) FOLLED BY
 BLANK SCREEN. FOLLOWED BY BLANK INSTRUMENT
 SCREEN. FOR SOME SECONDS. THEN ALL SCREENS BECAME
 FUNCTIONAL. TODAY AS RADIO PLAYED THERE WAS A LOSS
 OF SOUND WITH VISUAL INDICATION RADIO OPERATION
 WAS CONTINUING AS A BUMP IN THE ROAD WAS NOTED.
 RADIO REMAINED SILENT TILL LATER AS ENGINE WAS

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RESTARTED. RADIO THEN SOUNDED THROUGH SPEAKERS.

- NHTSA ID Number 11256408, September 18, 2019 (Incident Date July 2, 2019): WHILE DRIVING IN MOTION AND RUNNING OVER SLIGHTLY BUMPY SURFACE I WILL HEAR STATIC IN THE SPEAKERS AFTER HITTING A FEW MORE BUMPS THE AUDIO WILL SHUT OFF. THEN THE INFOTAINMENT SCREEN WITH EITHER SAY 'FM RADIO UNAVAILABLE' OR 'NETWORK COMMUNICATIONS LOST' FOLLOWING THIS THE INFOTAINMENT SCREEN WILL EITHER REBOOT OR STAY OFF UNTIL THE CAR IS RESTARTED. IN SOME CASES WHEN THE INFOTAINMENT SCREEN WENT OFF THE DRIVER SCREEN THAT DISPLAYS SPEED, RPM AND OTHER SAFETY WARNING MESSAGE SHUTS OFF AND REBOOTS WHILE DRIVING IN MOTION WHICH IS VERY DISTRACTING AND UNSAFE. I HAVE HAD MY 2019 PASSPORT AT THE DEALER FOUR TIMES WHERE THEY HAVE CHECKED CONNECTIONS, REPLACED WIRING HARNESS AND EVEN REPLACED THE DRIVER SCREEN MODULE. WEEKS AFTER THIS LAST FIX THE SAME ISSUES HAPPENED AGAIN AND NOW BOTH SCREENS ARE BLANK AND WILL NOT COME BACK ON AFTER RESTARTING THE CAR. IT IS HEADING TO THE DEALER FOR YET ANOTHER DIAGNOSTIC. NOTE DURING MOST OF THESE ISSUES I WAS USING CAR PLAY BUT HAVE ALSO EXPERIENCED IT JUST USING FM RADIO. THE PROBLEMS USUALLY DON'T SURFACE TILL AFTER DRIVING ON A BUMPY ROAD.
- NHTSA ID Number 11296948, January 3, 2020 (Incident Date December 21, 2019): STARTING AT ABOUT 500 MILES, A CRACKLING NOISE WOULD PROPAGATE THROUGH THE SPEAKERS AND THE INFOTAINMENT AND REARVIEW CAMERA WOULD SHUT OFF. TOOK THE CAR FOR SERVICE AND THE FIXED THE PROBLEM FOR A FEW HUNDRED MILES WHEN IT CAME BACK MUCH MORE SEVERE. STEPPING ON THE GAS, OR BUMPS WOULD PRODUCE ERRATIC ISSUES, NOT ONLY FREEZING THE INFOTAINMENT ALONG WITH INTENSE CRACKLING NOISES, BUT ALSO, BRAKING ON ITS OWN. TOOK THE CAR TO BACK FOR SERVICE AND THE DEALER STATED THAT THEY COULD NOT REPRODUCE THE BRAKING ON ITS OWN ISSUE. NOT UNSURPRISING BECAUSE THE PATTERN OF

1 PROBLEMS IS RANDOM. SERVICE AT LEAST ADMITTED THE
2 INFOTAINMENT ISSUES AND I WAS TOLD THAT THIS IS A
3 COMMON PROBLEM THAT HONDA IS WORKING ON A REPAIR
4 INVOLVING REPLACEMENT OF THE HARNESS. THEY WANTED
5 TO REPLACE THE INFOTAINMENT UNIT BUT THE PART
6 WOULD NOT BE IN STOCK FOR ALMOST 4 WEEKS. THE
7 PROBLEMS HAVE ONLY WORSENERD SINCE AND NOW
8 BLACKING OUT OF THE SPEEDOMETER IS THE LATEST
9 SAFETY ISSUE. CALLED HONDA AND ASKED TO HAVE THE
10 CAR REPLACED, ONLY TO BE TOLD THAT I AM A LIAR AND
11 THE CAR HAS NOT BEEN SERVICED ONCE YET. THE HONDA
12 REPRESENTATIVE PROVIDED THE MOST DISGUSTING
13 CUSTOMER SERVICE I HAVE EVER ENCOUNTERED DENYING
14 THE ISSUES AND TELLING ME THAT THERE IS NO SAFETY
15 ISSUE AND BASICALLY IMPLYING THAT THE INFOTAINMENT
16 PROBLEM ALMOST DOES NOT EXIST. HE LIED TELLING ME
17 THAT HONDA IS NOT WORKING ON ANY PERMANENT FIX, AS
18 ACCORDING TO HIM THERE IS NOT A PROBLEM. DEALER AND
19 SERVICE EMPLOYEES ALL KNOW THE PROBLEM, BUT HONDA
20 BELIEVES THAT ITS CUSTOMERS ARE IDIOTS WITH ZERO
21 INTELLIGENCE. MADE ME REALIZE THE IMPORTANCE OF
22 USING A LAWYER AND PARTICIPATING IN CLASS ACTIONS,
23 AS THE ONLY WAY HONDA WILL RESPOND TO THE
24 "ELEPHANT IN THE ROOM" IS THROUGH LEGAL ACTION. I
25 ALSO HOPE NHTSA WILL ACT QUICKLY ON THIS VERY WELL
26 KNOWN PROBLEM AND FORCE A SOLUTION.

- 27 • NHTSA ID Number 11301886, January 25, 2020 (Incident Date January
28 8, 2020): THE INFOTAINMENT CENTER WILL DISPLAY A
CONNECTION ERROR AND THEN SHUT OFF WHILE DRIVING.
THE SCREEN BEHIND THE STEERING WHEEL WILL ALSO SHUT
OFF WHILE DRIVING. THE PROBLEMS SEEM TO OCCUR WHEN
HITTING A BUMP IN THE ROAD SMALL OR LARGE. ALSO
WHEN THIS OCCURS THE SPEAKERS WILL CRACKLE AND POP
IF ANY AUDIO WAS PLAYING WHEN THE ISSUE STARTED. THE
SPEAKERS OCCASIONALLY WILL CRACKLE AND POP EVEN IF
THERE WAS NO AUDIO PRIOR TO THE ISSUE OCCURRING.
- NHTSA ID Number 11302157, January 27, 2020 (Incident Date January
2, 2020): WHILE DRIVING A CRACKLE IS EMITTED FROM THE

1 FRONT SPEAKERS. THE TUNER WILL BLANK OUT AND
 2 DISPLAY "CHECK TUNER", THEN THE ENTIRE INSTRUMENT
 3 POD GOES DARK. NO SPEEDOMETER, NO OTHER INSTRUMENT
 4 INFORMATION. APPEARS TO BE DOING A REBOOT , WHILE
 5 THE CAR IS IN MOTION. SEEMS TO BE RELATED TO TURNING
 6 CORNERS OR HITTING SMALL BUMPS IN THE ROAD. VERY
 7 DANGEROUS BECAUSE IT HAPPENS AT ANYTIME,
 8 REGARDLESS OF SPEED YOU ARE TRAVELLING. SUDDENLY
 9 ENTIRE DASHBOARD IS BLACK. CAR HAS APPROXIMATELY
 10 6,000 MILES ON IT, BUT PROBLEM BEGAN EARLIER AND HAS
 11 PROGRESSIVELY GOTTEN WORSE.

- 12 • NHTSA ID Number 11307872, February 8, 2020 (Incident
 13 Date November 19, 2019): THE ENTIRE AUDIO/ELECTRICAL GOES
 14 OUT WHILE DRIVING. CRACKLING, POPPING SOUNDS, SOUND
 15 LIKE SMALL PEBBLES HITTING WINDSHIELD, OR ELECTRICAL
 16 SHORTS, AND THEN THE ENTIRE CONSOLE GOES OUT. BACK
 17 UP CAMERA, ALL AUDIO, NAVIGATION, SCREEN FADES IN
 18 AND OUT FEW TIMES, WITH THE SMALL CRACKLE SOUNDS,
 19 THEN USUALLY A LOUD CRACK, AND EVERYTHING GOES
 20 DARK. IF YOU PULL OVER, SHUT OFF CAR, AND RESTART,
 21 SOMETIMES IT COMES BACK. IF YOU ARE DRIVING, IT MAYBE
 22 RESTARTS IN 10-15 MINUTES, BUT WILL CONTINUE WITH
 23 SHORTING OUT AGAIN. BRAND NEW VEHICLE, BOUGHT AT
 24 THE END OF OCTOBER 2019. HONDA DOES NOT SEEM TO
 25 HAVE FIX, OR ANY CONNECTIONS TO WHY SOME VEHICLES
 26 HAVE THIS PROBLEM, AND OTHERS DO NOT. I HAVE
 27 REACHED OUT TO THE HONDA CORPORATION, WITH LITTLE
 28 RESPONSE BACK FROM THEM. OUR GARAGE IS DOING THE
 BEST THEY CAN, FOLLOWING BULLETINS ON UPDATES FOR
 WHAT OR HOW TO ATTEMPT REPAIR FROM HONDA. OUR
 NEW CAR HAS BEEN IN GARAGE 2 DIFFERENT
 OCCASIONS, NOVEMBER 2019, AND FEBRUARY 2020, FOR
 DAYS AT A TIME, FOR THE SAME PROBLEM. HONDA KNEW
 THIS WAS A PROBLEM, AND STILL SOLD VEHICLES.
- NHTSA ID Number 11308293, February 10, 2020 (Incident
 Date January 6, 2020): WHILE DRIVING OVER SLIGHTLY ROUGH
 ROADS, THE RADIO SPEAKERS WILL MAKE A CRACKLING
 AND POPPING NOISE. SOMETIMES TO THE POINT OF

1 COMPLETE MALFUNCTION WHERE THE SOUND WILL GO OFF
2 COMPLETELY AND SHOW A MESSAGE OF NO AUDIO INPUT.
3 THE ONLY WAY TO RESET THE AUDIO IS TO STOP THE
4 VEHICLE, SHUT OFF THE IGNITION, AND OPEN THE DRIVERS
5 DOOR TO END THE RETAINED ACCESSORY POWER FEATURE,
6 THEN RESTART THE VEHICLE WHICH REBOOTS THE
7 INFOTAINMENT SYSTEM. PROBLEM WAS REPORTED TO THE
8 DEALER SERVICE DEPARTMENT WHO SAYS THEY CAN'T
9 REPLICATE THE PROBLEM. THIS OCCURS WHILE USING ANY
10 AUDIO INPUT SOURCES, INCLUDING THE MAPS FEATURE IN
11 APPLE CARPLAY. IT'S VERY DISTRACTING AND THEREFORE A
12 POTENTIALLY DANGEROUS PROBLEM WHILE DRIVING THE
13 VEHICLE.

- 14 • NHTSA ID Number 11316669, March 6, 2020 (Incident Date March 6,
15 2020): WHILE THE VEHICLE IS RUNNING AND DRIVING, THE
16 INFOTAINMENT SYSTEM FAILS. THE FIRST EVENT IN THE
17 SEQUENCE IS THAT THE AUDIO FROM ANY SOURCE (AM, FM,
18 SATELLITE, IPHONE) WILL START TO CRACKLE AND
19 INTERMITTENTLY CUT OUT. THEN THE INFOTAINMENT
20 SCREEN IN THE CENTER OF DASHBOARD WILL GO DARK AND
21 ALL SOUND WILL STOP. ADDITIONAL EVENTS INCLUDE THE
22 DRIVER SCREEN (SPEEDOMETER, ETC.) BEHIND THE
23 STEERING WHEEL GOING DARK. SOMETIMES THE MESSAGES
24 'NO AUDIO SOURCE' OR 'NETWORK CONNECTION LOST' ARE
25 DISPLAYED ON THE SCREEN. OCCASIONALLY THE SYSTEM
26 WILL TRY AND REBOOT AFTER 10-15 MINUTES, WITH THE
27 SCREENS TURNING ON AGAIN FOR A SHORT PERIOD OF TIME
28 (5-10 SECONDS) BEFORE GOING DARK AGAIN. THE ONLY WAY
TO RECOVER TEMPORARILY IS TO PARK, TURN THE VEHICLE
OFF, OPEN THE DRIVER'S DOOR (SHUTS OFF RETAINED
ACCESSORY POWER) AND THEN RESTART THE VEHICLE. THIS
SYSTEM FAILURE HAPPENS WITH AND WITHOUT AN IPHONE
CONNECTED VIA GENUINE APPLE USB CABLE. NONE OF THE
FOLLOWING HAVE RESOLVED THE PROBLEM: RESETTNG
THE INFOTAINMENT SYSTEM TO FACTORY SETTINGS;
DISCONNECTING THE BATTERY CABLE UNDER THE HOOD;
AND, TEMPORARILY REMOVING THE INFOTAINMENT POWER
FUSE UNDER THE HOOD. CHECKING THE SYSTEM SETTINGS
VIA THE INFOTAINMENT SYSTEM APPLICATION INDICATES

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THAT THE SYSTEM IS UP TO DATE AND NO UPDATES ARE AVAILABLE. THIS HAS BEEN HAPPENING FOR SEVERAL MONTHS. THE HONDA DEALER SERVICE DEPARTMENT STATED THAT THEY NEVER HEARD OF THIS ISSUE, AND SUGGESTED THAT I FILM THE ISSUE WHEN IT OCCURS!

- NHTSA ID Number 11317033, March 9, 2020 (Incident Date February 27, 2020): WHEN USING THE AUDIO SYSTEM (APPLEAIRPLAY, BLUETOOTH, SIRIUS OR FM RADIO), THE SPEAKERS AT SOME POINT WILL BEGIN CRACKLING AND MAKING POPPING NOISES, SIMILAR TO STATIC NOISES, WHICH CAUSES THE MUSIC TO INTERRUPT AND CUT OUT. EVEN WHEN YOU TURN THE AUDIO OFF, THE SPEAKERS CONTINUE TO MAKE THE CRACKLE AND POP SOUNDS. YOU HAVE TO TURN THE CAR OFF AND OPEN THE DOOR TO COMPLETELY CUT OFF THE AUDIO. IT HAPPENS RANDOMLY AND IS A COMPLETE DISTRACTION WHILE DRIVING. THE DISPLAY SCREEN ALSO CUTS IN AND OUT WHILE IN USE USING THE BACKUP CAMERA, MUSIC OR GOOGLE MAPS, ETC. AS WELL. THE CAR CAN BE IN MOTION OR PARKED, IT HAPPENS. THIS STARTED IN FEB 2020, 1 MONTH AFTER LEASING THE CAR AND APPROX 1000 MILES.
- NHTSA ID Number 11320010, April 2, 2020 (Incident Date November 21, 2019): WHILE DRIVING ON THE HIGHWAY MY PASSPORT, I SMELLED WHAT REMINDED ME OF ELECTRICAL WIRES SIZZLING IT WAS COMING FROM THE HONDA DISPLAY AUDIO UNIT .THE APPLE PLAY STOP WORKING AND I HAD NO AUDIO SOUND FROM THE RADIO OR OTHER APP. THE UNIT WAS UNRESPONSIVE AND REMAIN ON WITH THE ENGINE CUT OFF. THE DISPLAY WHILE NOT WORKING REMAIN ON FOR THREE DAY BEFORE TURNING OFF. THE UNIT RANDOMLY CONTINUE TO GO OUT AFTER THE SMELL OF BURNING WIRE. AND ERROR CODE BEGIN TO DISPLAY: 6382 APPEARED. THIS PROBLEM IS STILL OCCUR AND I HAD TO REPLACE MY I PHONE BECAUSE THE INSIDE OF THE PHONE WAS BURN. I DO WANT TO HAVE THE PASSPORT CAUSE HARM TO SOMEONE BEFORE CHECK THIS SAFE ISSUE OUT.
- NHTSA ID Number 11320456, April 7, 2020 (Incident Date January 20, 2020): MY COMPLAINT CONCERNS THE INFOTAINMENT

1 SYSTEM. THE SOUND OUTPUT WILL CRACKLE, SKIP OUT OR
2 SHUT DOWN ALTOGETHER. WHEN THIS HAPPENS, IT AFFECTS
3 ALL OUTPUTS INCLUDING FM, SATELLITE, CARPLAY AND
4 THE HANDS FREE. RESTARTING THE AUDIO SYSTEM DOES
5 NOT WORK. WHEN FEASIBLE, SHUTTING OFF THE ENGINE
6 WILL NOT RESET THE SYSTEM UNTIL THE DRIVER DOOR IS
7 OPENED. THIS MAY OR MAY NOT FIX THE PROBLEM. THE
8 MOST SEVERE PROBLEM OCCURS WHEN THE SPEEDOMETER
9 INSTRUMENT PANEL GOES BLACK WHILE THE VEHICLE IS IN
10 MOTION. THE INSTRUMENT PANEL GOING BLACK HAS
11 ALWAYS OCCURRED WHILE ON THE HIGHWAY AT GREATER
12 THAN 65MPH. THESE PROBLEMS HAVE ALWAYS HAPPENED
13 WHEN THE VEHICLE IS IN MOTION. OCCASIONALLY IT MAY
14 START CRACKLING AFTER HITTING A BUMP. OTHER TIMES,
15 THERE IS NO IDENTIFIED CAUSE FOR THE DYSFUNCTION. THE
16 ATTACHED PICTURES SHOW SOME OF THE ERROR CODES
17 AND MESSAGES SEEN

- 18 • NHTSA ID Number 11325758, May 25, 2020 (Incident Date May 23,
19 2020): INFOTAINMENT SYSTEM MALFUNCTIONS CAUSING
20 BACKUP CAMERA AND NAVIGATION SYSTEMS TO NOT
21 FUNCTION AND SENDS LOUD CRACKLING NOISES THROUGH
22 SPEAKERS. ALSO CAUSES INSTRUMENT PANEL TO FAIL FOR
23 MINUTES AT A TIME. CONNECTIONS TO INFOTAINMENT AND
24 DASHBOARD DISPLAYS FAIL WHILE IN MOTION AFTER
25 MINOR BUMPS IN ROAD.
- 26 • NHTSA ID Number 11330554, June 24, 2020 (Incident Date June 2,
27 2020): INFOTAINMENT SYSTEM FAILS, SOMETIMES REBOOTS.
28 CRACKING AND POPPING PRECEDE IT USUALLY - SOUNDS AS
IF IT'S COMING FROM SPEAKERS. THEN COMPLETE
INFOTAINMENT LCD FAILS - GOES BLACK. THIS LEAVES THE
BACKUP CAMERA NON-FUNCTIONAL. *TR
- NHTSA ID Number 11340935, July 22, 2020 (Incident Date July 1,
2020): WHILE THE CAR IS IN MOTION THE SPEAKERS MAKE A
LOUD CRACKLING AND POPPING NOISE. THE CAR AUDIO
FAILS WITH AN ERROR MESSAGE THAT SAYS "RADIO
UNAVAILABLE" OR "NETWORK COMMUNICATIONS LOST".
THIS CAUSES ALL AUDIO TO QUIT WORKING, ALONG WITH
THE BACK UP CAMERA, NAVIGATION AND BLUETOOTH. IN

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ADDITION, THE SPEEDOMETER FAILS AND GOES COMPLETELY BLANK WHILE DRIVING. SOMETIMES THE SYSTEM REBOOTS ITSELF AFTER STAYING DEAD FOR SEVERAL MINUTES. I HAVE TAKEN THE CAR TO THE HONDA DEALERSHIP TWICE. THEY TELL ME THEY SUBMIT VIDEOS TO THE TECH LINE OF THE PROBLEM OCCURRING, BUT THEY DO NOT HAVE A SOLUTION FOR A FIX. PROBLEM STARTED WHEN VEHICLE HAD APPROXIMATELY 10,000 MILES. NOW VEHICLE HAS 32,000 MILES AND THE ISSUE HAS PROGRESSIVELY GOTTEN WORSE. THESE ISSUES OCCUR EVERY TIME THE CAR IS DRIVEN, WHICH IS MULTIPLE TIMES DAILY.

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

2020 Honda Passport:

- August 5, 2020: SHORT IN THE ELECTRICAL SYSTEM CAUSES CRACKLING/POPPING TO COME OUT OF INFOTAINMENT SPEAKERS. INFOTAINMENT SYSTEM CAN BE SET TO OFF AND PROBLEM WILL STILL PERSIST. THE CRACKLING AND POPPING CAN HAPPEN RANDOMLY AND TO VARIOUS LOUDNESS LEVELS. UNDER ABRUPT BRAKING OR ROAD BUMP, PROBLEM WILL OCCUR LOUDLY. THE NOISE CAN SOUND LIKE ROAD GRAVEL HITTING WINDSHIELD AND IS VERY DISTRACTING. WEATHER, SUCH AS VERY HUMID OR

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RAINING CONDITIONS WORSENS THE PROBLEM AND INCREASES ODDS OF IT HAPPENING.

- October 28, 2020: STATIC, CRACKING, POPPING, AND LOSS OF INFOTAINMENT CENTER, EVEN WHEN VEHICLE IS TURNED OFF.
- September 7, 2021: Manufacturer Communication Number: A21-012 Summary Service Bulletin - A loose connection in the MOST bus network is causing a popping or crackling from the speakers or no sound from the audio system. You may also see a Network Loss message and/or display issues. This is a known problem. On my vehicle it caused the rear camera to go out which is required safety equipment. Also the noise is so loud sometimes it startles me and I jerk the steering wheel. I have been to the dealer 2 times and they say it is a known problem but have no parts. This has been going on for over a year now and this problem need to be a safety recall.
- March 31, 2022: When driving at any speed vehicle computers (system and entertainment) loose communication and malfunction, causing loss of display and function. This loss of communication causes a loud crackling & popping noise to be generated by the system through the vehicle speakers. This problem persist while driving until the vehicle is stopped, turned off and door opened. Research on Honda internet forums has revealed thousands of postings from owners with the same and similar problems. I have taken this vehicle to Honda service more than 3 times. Each time was told a manufacturing defect in wiring harness of the MOST system is the cause. Each repair has been unsuccessful in permanently correcting the defect. This problem, being random and tied to rough terrain or road bumps can happen at anytime. When this happens it is a major distraction. When system error many warnings are flashes and various vehicle features stop functioning. This affect drive system, safety system and entertainment system. It is unknown if safety systems would function when this problem is actively happening. This is the scary part of it. I have given Honda every opportunity to fix the problem. They tell me it is not a recall but is covered under an "extended service period" due to this known issue. I have seen many technical service bulletins pertaining to this issue. This needs to be elevated to a recall. I do have videos of this malfunction.

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2019 Honda Odyssey:

- NHTSA ID Number 11245568, August 21, 2019 (Incident Date May 10, 2019): THE INFOTAINMENT SYSTEM STARTED SHUTTING DOWN AND CRACKLING STARTED IN THE SPEAKERS WHEN THE CAR WAS 3 WEEKS OLD. THE BLUETOOTH OPTION AND APPLE CAR PLAY ARE COMPLETELY UNUSABLE DUE TO THE CRACKLING. THEY STOP WORKING APPROXIMATELY 30 SECONDS INTO USE. NO SOUND. THE ENTIRE SYSTEM WILL SHUT DOWN RANDOMLY, STATING NO NETWORK COMMUNICATION AND RADIO UNAVAILABLE BEFOREHAND. THE DEALERSHIP HAS REFUSED TO REPLACE ANY PARTS, INCLUDING THE RADIO HARNESSSES, WHICH ARE THE MAIN SUSPECTS FOR THE CRACKLING. CRACKLING SOUND WORSENS DURING TURNS.
- NHTSA ID Number 11281043, November 19, 2019 (Incident Date November 19, 2019): FREQUENT LOUD CRACKLING NOISES COME FROM THE SPEAKERS, FOLLOWED BY A NETWORK CONNECTION LOST ERROR MESSAGE ON THE SCREEN, AND THEN THE SCREEN WILL GO BLACK AND EVENTUALLY THE SYSTEM WILL REBOOT. THIS WILL HAPPEN REPEATEDLY WHILE DRIVING AND DOES NOT DEPEND ON THE STATE OR USE OF THE INFOTAINMENT SYSTEM (IT CAN BE OFF AND STILL HAPPEN). THERE SEEMS TO BE A CORRELATION WITH GOING OVER A BUMP, SUGGESTING A LOOSE CONNECTION SOMEWHERE. WHEN RESTARTING OR OFF, THE RADIO, CLIMATE CONTROLS AND THE BACKUP CAMERA ARE ALL UNAVAILABLE. THIS IS A SAFETY HAZARD AS IT DISTRACTS THE DRIVER AND ALSO PREVENTS USAGE OF THE BACKUP CAMERA. BEGAN HAPPENING INTERMITTENTLY AT AROUND 1500 MILES AND NOW AT ~1700 MILES IT HAPPENS ESSENTIALLY ALL THE TIME.
- NHTSA ID Number 11301355, January 23, 2020 (Incident Date June 20, 2019): OUR 2019 ODYSSEY STARTED HAVING PROBLEMS SHORTLY AFTER WE GOT IT. I TRIED TROUBLE SHOOTING MYSELF FOR AWHILE. FINALLY STARTED TAKING IT TO THE DEALERSHIP AFTER 6 MONTHS OF OWNING IT AND IT'S BEEN THERE MORE TIMES THAN I CAN COUNT. IT HAS ELECTRICAL

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PROBLEMS, BLUETOOTH DOESN'T WORK, THE INFOTAINMENT SYSTEM DOESN'T WORK PROPERLY. NOBODY CAN HEAR ME WHEN I TALK TO THEM THROUGH THE BLUE TOOTH OR APPLE CAR PLAY. THE POPPING IN THE DASH BOARD IS AWFUL AND IT SOUNDS LIKE THE VAN IS GOING TO CATCH FIRE AT ANY MOMENT. THEY HAVE DONE A DASH HARNESS AND FULL BODY HARNESS ON OUR VAN WITH NO SUCCESS. THESE PROBLEMS HAPPEN WHEN DRIVING AND THE POPPING IS WHEN THE INFOTAINMENT/RADIO/MUSIC IS PLAYING OR NOT PLAYING. IT'S A SERIOUS HAZARD.

- NHTSA ID Number 11343492, August 5, 2020 (Incident Date November 25, 2019): THE CENTRAL DISPLAY GOES BLANK, SOMETIMES I GET A MESSAGE NETWORK COMMUNICATIONS LOST, WHEN ITS BLANK THERE IS NO BACKUP CAMERA, RADIO, ENTERTAINMENT SYSTEM PHONE BLUETOOTH... AND EVEN WHEN THE DISPLAY WORK THE BACKUP CAMERA WILL NOT ALWAYS DISPLAY AND THE ENTERTAINMENT SYSTEM WILL NOT ALWAYS WORK., I ALSO HEAR A POPPING SOUND FROM THE SPEAKER SYSTEM LIKE SOME WIRES ARE LOOSE... I ALSO HAD A FEW TIMES THAT THE DASHBOARD BEHIND THE STEERING WHEEL WHERE THE SPEED AND OTHER IMPORTANT INFO ARE DISPLAYED WENT BLANK. THIS HAPPENED WHEN THE CAR WAS BRAND NEW WITH LESS THAN 500 MILES, I WENT TO SERVICE BUT IT DIDNT HELP. THE CONSUMER STATED THAT IN MARCH OF 2020, THEY WERE INFORMED THAT THEIR WAS RADIO WAS SERVICED WITHOUT FOREWARNING. *AS
- NHTSA ID Number 11320592, April 8, 2020 (Incident Date October 1, 2019): TL* THE CONTACT OWNS A 2019 HONDA ODYSSEY. THE CONTACT STATED THAT THERE WAS AN ABNORMAL POPPING SOUND COMING FROM THE DASHBOARD AND THE ELECTRONICS IN THE VEHICLE. THE VEHICLE WAS TAKEN TO HARE HONDA - SERVICE DEPARTMENT (8693 US-36, AVON, IN 46123, (317) 854-4791) WHERE AN UNKNOWN WIRING HARNESS AND INSTRUMENT PANEL WERE REPLACED HOWEVER, THE FAILURE RECURRED. THE CONTACT STATED THAT THE VEHICLE WAS THEN INCLUDED IN NHTSA CAMPAIGN NUMBER: 20V066000 (ELECTRICAL SYSTEM). THE VEHICLE

1 WAS REPAIRED UNDER THE RECALL HOWEVER, THE FAILURE
2 RECURRED AND WORSENER. A REPRESENTATIVE AT THE
3 DEALER CONTACTED THE MANUFACTURER ON BEHALF OF
4 THE CONTACT AND REQUESTED THAT A TECHNICIAN BE
5 SENT TO INSPECT AND REPAIR THE VEHICLE. THE
6 TECHNICIAN REPAIRED THE VEHICLE HOWEVER, THE
7 FAILURE PERSISTED. THE MANUFACTURER WAS NOTIFIED
8 BY THE DEALER OF THE ADDITIONAL FAILURE. THE VEHICLE
9 WAS NOT REPAIRED. THE APPROXIMATE FAILURE MILEAGE
10 WAS 1,498.

- 11 • NHTSA ID Number 11321405, April 17, 2020 (Incident Date February
12 1, 2020): THE RADIO AND COMPUTER SYSTEM CRACKLES
13 MAKE LOUD NOISE THAT SOUNDS LIKE WIRING RUBBING
14 TOGETHER, COMPUTER SCREEN SHUTS OFF AND RESETS AND
15 YOU LOSE FUNCTIONALITY OF YOUR SYSTEM THAT IS
16 CONNECTED TO RADIO, PHONES AND MAPS. THIS HAPPENS
17 INTERMITTENTLY AND THE VEHICLE CAN BE MOTION OR
18 STATIONARY. *TR
- 19 • NHTSA ID Number 11386929, January 7, 2021 (Incident
20 Date September 1, 2020): DVD PLAYER WILL NOT PLAY MOVIES.
21 DVD PLAYER GETS EXTREMELY HOT. AUDIO THROUGHOUT
22 ENTIRE VEHICLE EXPERIENCES A CONSTANT
23 SNAPPING/CRACKLE NOISE. THIS HAPPENS WHILE VEHICLE
24 IS MOVING OR STATIONARY. DOES NOT HAPPEN ALL THE
25 TIME. PROBABLY DUE TO A PINCHED WIRE IN A HARNESS
26 NEAR INFOTAINMENT SYSTEM. REPORTED TO DEALERSHIP.
27 THEY REFUSED TO REPAIR UNDER WARRANTY BECAUSE
28 VEHICLE HAD BEEN DRIVEN OVER 35,000 MILES. SPENT
\$40,000 FOR A NEW VAN AND WITHIN FIRST YEAR WE NEED
TO SPEND OUR MONEY TO REPAIR THEIR MISTAKE.
SHAMEFUL.
- NHTSA ID Number 11415280, May 5, 2021 (Incident Date May 4,
2020): THE SCREEN ON MY VEHICLE GOES BLACK AND
SHOWS "NETWORK COMMUNICATION LOST" AT RANDOM.
THE SPEAKERS START MAKING A CRACKLING AND STATIC
SOUND AT RANDOM AS WELL. THE SYSTEM WILL REBOOT
OVER AND OVER. YOU CANNOT USE THE REARVIEW BACKUP
CAMERA DURING THIS REBOOTING AND TURNING THE

1 VEHICLE ON AND OFF DOES NOT MAKE IT START WORKING
2 AGAIN.

3 ***2020 Honda Odyssey:***

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- 5 • NHTSA ID Number 11282932, November 29, 2019 (Incident
6 Date November 25, 2019): FREQUENT LOUD CRACKLING NOISES
7 COME FROM THE SPEAKERS, FOLLOWED BY A NETWORK
8 CONNECTION LOST ERROR MESSAGE ON THE SCREEN, AND
9 THEN THE SCREEN WILL GO BLACK AND EVENTUALLY THE
10 SYSTEM WILL REBOOT. THIS WILL HAPPEN REPEATEDLY
11 WHILE DRIVING AND DOES NOT DEPEND ON THE STATE OR
12 USE OF THE INFOTAINMENT SYSTEM (IT CAN BE OFF AND
13 STILL HAPPEN). THERE SEEMS TO BE A CORRELATION WITH
14 GOING OVER A BUMP, SUGGESTING A LOOSE CONNECTION
15 SOMEWHERE. WHEN RESTARTING OR OFF, THE RADIO,
16 CLIMATE CONTROLS AND THE BACKUP CAMERA ARE ALL
17 UNAVAILABLE. THIS IS A SAFETY HAZARD AS IT DISTRACTS
18 THE DRIVER AND ALSO PREVENTS USAGE OF THE BACKUP
19 CAMERA. BEGAN HAPPENING INTERMITTENTLY AT AROUND
20 1500 MILES AND NOW AT ~1700 MILES IT HAPPENS
21 ESSENTIALLY ALL THE TIME. PLEASE ADDRESS THIS ISSUE
22 SOONEST POSSIBLE. MANY PEOPLE BUYING HONDA CARS
23 AND NOT AWARE OF THESE ISSUES !!!
 - 24 • NHTSA ID Number 11338423, July 9, 2020 (Incident Date May 7,
25 2020): THE CAR IS MAKING A CRACKLING NOISE FROM THE
26 DASH BROAD. TOOK IT TO THE DEALERSHIP AND THE
27 LATTER STATED THAT HONDA IS AWARE OF THE ISSUE AND
28 THAT THE CRACKLING/SPARKLING NOISE COME FROM THE
SPEAKERS. HE FURTHER STATED THAT HONDA IS WORKING
WITH NHTSP ON A FIX. THE NOISE ACCENTUATES WHEN THE
DRIVER STEPS ON THE BRAKES, BUT ALSO WHEN S/HE
SPEEDS UP.
 - NHTSA ID Number 11338392, July 9, 2020 (Incident Date June 9,
2020): I PURCHASED AN ODYSSEY AND WITHIN LESS THAN 2
WEEKS, THE INFOTAINMENT SYSTEM STARTED DISPLAYING
PROBLEMS. THE SYSTEM GIVES A LOUD, CRACKLING NOISE
OVER THE SPEAKERS. SOMETIMES THE AUDIO CONNECTION
WILL CUT OUT WITH VARYING ERROR MESSAGES. OTHER

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TIMES THE ENTIRE SCREEN WILL GO BLACK/TURN OFF FOR SEVERAL MINUTES, COMPLETING DISABLING THE BACKUP CAMERA AND OTHER FUNCTIONS. WHEN THE AUDIO GOES OUT IT WILL ALSO HANG UP/DISABLE ANY GOES GOING OVER ANDROID AUTO OR BLUETOOTH. THE AUDIO DISPLAY SCREEN FOR ANDROID AUTO WILL SOMETIMES FREEZE. I'VE ALREADY HAD MY VEHICLE IN THE SHOP TWICE FOR THIS PROBLEM WITHIN A MONTH AND A WEEK OF OWNING THE CAR AND THERE'S BEEN NO RESOLUTION YET. I'VE SEEN THAT THERE'S A CLASS ACTION LAWSUIT FOR THIS EXACT PROBLEM IN THE 2018 AND 2019 MODELS, WHICH APPARENTLY DID NOT GET RECTIFIED FOR 2020. THE PROBLEM OCCURS RANDOMLY AND SPORADICALLY, BUT DOES OCCUR ALMOST EVERY SINGLE TIME I DRIVE THE CAR AT SOME POINT OR ANOTHER. IT'S EXTREMELY DISTRACTING AND NOT SAFE.

- NHTSA ID Number 11350124, August 18, 2020 (Incident Date August 15, 2020): WHILE DRIVING ON INTERSTATES AND LOCAL ROADS, THE ONBOARD "INFOTAINMENT" SYSTEM CONTINUALLY EMITS LOUD POPPING, CRACKLING SOUND (SOUNDS LIKE THINGS HITTING WINDSHIELD), RESULTING IN DISTRACTION AND CONFUSION WHILE DRIVING. VARIOUS COMPONENTS OF THE INFOTAINMENT SYSTEM RANDOMLY GO OUT, CAUSING SYSTEM REBOOTS WHILE DRIVING AND CREATING DISTRACTION. NAVIGATION SYSTEM IS ALSO SOMETIMES AFFECTED, FAILING TO PROVIDE TURN GUIDANCE OR GIVE ACCURATE LOCATION. REAR "CABIN VIEW" FREEZES INTERMITTENTLY, DISPLAYING ONLY STILL IMAGE RATHER THAN VIEW OF REAR SEATS. FM RADIO RANDOMLY CUTS OUT, DISPLAYING "NO AUDIO CONNECTION FOR FM".
- NHTSA ID Number 11365120, October 19, 2020 (Incident Date October 16, 2020): PURCHASED BRAND NEW MARCH 2020. EXPERIENCING ISSUES WITH RADIO STATIC, POPPING NOISES FROM SPEAKERS, RADIO NOT FOUND ERROR MESSAGE WHILE DRIVING. RADIO STILL RUNNING AFTER CAR IS TURNED OFF AND DOORS ARE OPENED. WE HAVE TO TURN THE CAR BACK ON AND OFF AGAIN TO GET THE RADIO TO

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SHUT OFF. ISSUES WORSENER AFTER RECALL WORK WAS COMPLETED.

- NHTSA ID Number 11375340, November 19, 2020 (Incident Date September 4, 2020): DEFECTIVE 2020 HONDA ODYSSEY RECEIVED BRAND NEW JUNE 9. BEGAN HAVING ISSUES IN 2 MONTHS. SERVICED AT BAYTOWN, TX COMMUNITY HONDA ON 9/11, 9/24,9/17,10/16 FOR OCCURRING ISSUE. PROBLEM HAS NOT BEEN RESOLVED. VIDEO DOCUMENTATION WITH TIME STAMP OF ISSUE IS SAVED. CASE OPEN WITH AMERICA HONDA: CASE MANAGER, ANTONIO DETERMINED THE HONDA TECHS AT THE DEALER ARE INCORRECTLY FIXING THE VAN. THE FAKRA CONNECTOR NEEDS TO BE REPLACED. HE WILL SUBMIT REQUEST TO FIELD MANAGER TEAM FOR A FIELD ENGINEER TO BE SCHEDULED TO SERVICE MY VAN. ANTONIO, CASE MANAGER, ALSO ADVISED TO CANCEL 11/19 APPOINTMENT WITH SERVICE DEPARTMENT AND TO WAIT FOR CALL BACK FOR HONDA FIELD ENGINEER. COSTUMER REQUESTED ETA, ANTONIO WOULD NOT PROVIDE ESTIMATED TIME, ADVISE TO WAIT FOR A CALL. POPPING NOISE, DISCONNECTS BLUETOOTH. POPPING NOISE OCCURS WHEN DRIVER IS ON A CALL, LISTENING TO MUSIC, AND EVEN DURING COMPLETE SILENCE THERE IS POPPING. ELECTRICAL ISSUE OCCURS DURING STATIONARY, IN MOTION, ON A CITY, HIGHWAY, AND TURNING. THE PROBLEM IS UNSAFE BECAUSE BLUETOOTH CONNECTION IS NOT WORKING PROPERLY WHICH PREVENTS ME TO SAFELY USE HAND FREE CALLING. THIS IS ILLEGAL IN THE STATE OF TEXAS. THE HONDA ODYSSEY 2020 CURRENTLY HAS 7298 MILES.
- NHTSA ID Number 11431882, September 6, 2021 (Incident Date August 2, 2021): Infotainment system failure. It started by popping and crackling then the entire screen and entertainment system went black. No radio, Bluetooth, backup camera or any of the controls on the infotainment system screen.
- NHTSA ID Number 11459395, April 3, 2022 (Incident Date December 1, 2021): Non-working touchscreen monitor (navigation, radio, heat/ac adjustments, everything on screen off and won't turn on. The usb outlets, backup camera, rear tv are also all non-working. Issue with doors, van

1 beeps twice when walking away from vehicle, like one is not shut
2 properly even after you open and shut all doors again. Also rear sliding
3 doors don't shut sometimes and act like there is something in the way of
4 it closing and reopening. Available anytime on Friday for inspection.
5 Safety issue only with backup camera. Prefer the convenience of having
6 one to see behind me better. Mirrors ok but camera better. Problem was
7 fixed twice at Honda dealership in Jonesboro Ar. They said it was a
8 recall. The solution to the recall only fixed it temporarily though. The
9 same above issues continue to reoccur even after repair. Scheduled and
10 went into Honda for the third time for the same issue and the dealership
11 sent me away. This time they said they wouldn't be able to fix again until
12 someone (an engineer) from corporate could come out and look at my
13 car. This hasn't occurred and it's been over two months. They said they
14 have a new service manager and they are looking into it. I've called a
15 number of times and I am just told their new and their trying to figure out
16 who to contact. Issues started out with popping and crackling noise in
17 speakers. Then the touchscreen monitor would say no audio connection.
18 The rear tv would go on and off too. Then the touchscreen just died and
19 nothing works now. It doesn't even turn on. Just black screen. So I have a
20 non-working touchscreen, navigation, radio, back up camera, heat/air
21 adjustments, all components on the touchscreen are non-working. USB
22 ports are non-working. Rear tv is non-working.

23 24. In fact, Honda has recently settled a class action lawsuit, *Conti, et al. v.*
24 *American Honda Motor Co., Inc.*, Case No. 2:19-cv-02160-CJC-GJS, filed in the
25 United States District Court for the Central District of California, involving certain
26 2018-2019 Honda Odyssey, 2019 Honda Pilot, and 2019 Honda Passport vehicles,
27 that alleged those vehicles too suffered from the Electrical Defect, amongst other
28 defects.² The *Conti* class action settlement does not include the Class Vehicles.

² [https://www.settlement-claims.com/infotainment/asset/honda/Notice%20of%20Motion%20for%20Prelim%20Approval%20of%20Class%20Settlement%20and%20Direction%20of%20Notice%20Under%20Fed%20R%20CI%20V%20P%2023\(e\).pdf](https://www.settlement-claims.com/infotainment/asset/honda/Notice%20of%20Motion%20for%20Prelim%20Approval%20of%20Class%20Settlement%20and%20Direction%20of%20Notice%20Under%20Fed%20R%20CI%20V%20P%2023(e).pdf) (last visited Jul. 1, 2022).

1 **B. Honda's Failure to Fix The Defect**

2 25. Furthermore, Honda admitted the Electrical Defect exists and attempted
3 to remedy it by addressing what Honda deemed to be a loose connection within the
4 Vehicles' electrical systems.
5

6 26. In early 2020, and before Plaintiff bought his car, based on the volume of
7 consumer complaints it received, Honda engineers conducted an analysis of the
8 problems with the Class Vehicles' electrical systems that caused such vehicles to
9 make popping or crackling noises from the speakers and/or produce no sound from the
10 audio and attempted to provide a solution.
11

12 27. As a result of this investigation, on August 4, 2020, Honda issued to its
13 dealers a Technical Service Bulletin ("TSB") No. 20-058, Version 1 (titled "Popping
14 or Crackling from the Speakers; No Sound from the Audio System; Network Loss
15 Message and/or Display Issues"), where it stated that "there is a loose connection in
16 the MOST bus network."
17

18 28. According to Honda's TSB No. 20-058, Version 1, the issues covered in
19 the bulletin affected certain 2019-2021 Honda Pilot and 2019-2020 Honda Passport
20 vehicles.
21

22 29. As a corrective action, Honda instructed its authorized dealers to
23 "[i]ninstall the FAKRA connector set and the MOST service cords."
24

25 30. Subsequently, Honda revised TSB No. 20-058 on September 8, 2020 and
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27
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1 September 10, 2020, wherein it supplemented the repair instructions and parts
2 information.
3

4 31. Then, on February 18, 2021, Honda issued to its dealers a TSB No. 21-
5 013, Version 1 (titled “Warranty Extension: 2018-20 Odyssey MOST Bus Network
6 Connectors”), covering certain 2018-2020 Honda Odyssey vehicles, where it stated
7 that a “loose connection in the MOST bus network is causing a popping or crackling
8 from the speakers or no sound from the audio system” and that “[t]here may also be a
9 Network Loss message and/or display issues.”
10
11

12 32. Just like in its TSB No. 20-058, in this TSB No. 21-013, as corrective
13 action, Honda instructed its authorized dealers to “[i]nstall the FAKRA connector set
14 and the MOST service cords.”
15

16 33. Notably, in that TSB Honda cautioned its dealerships to “make sure the
17 harness is routed correctly, as a missrouted harness can put pressure on the connectors
18 which may cause a connection issue,” and “not pull on the units while the FAKRA
19 connectors are connected to help prevent communication issues.”
20
21

22 34. The same day, on February 18, 2021, Honda revised TSB No. 20-058 for
23 the fourth time by supplementing the repair instructions and parts information, and
24 referring its dealerships to a communication by Brad Ortloff, Manager of Honda’s
25 Auto Campaign Administration Department, wherein Honda announced an extension
26 of the warranty for the MOST bus network connectors on certain 2018-2020 Odyssey,
27
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1 2019-20 Passport, and 2019-20 Pilot vehicles to 5 years or 60,000 miles from the
2 original date of purchase, whichever comes first (hereafter “Extended Warranty”).
3

4 35. Additionally, Honda revised this TSB to include a caution to its
5 dealerships to “make sure the harness is routed correctly, as a misrouted harness can
6 put pressure on the connectors which may cause a connection issue,” and “not pull on
7 the units while the FAKRA connectors are connected to help prevent communication
8 issues.”
9

10
11 36. On May 3, 2021, Honda revised TSB No. 20-058 for the fifth time by
12 including all 2020 and 2021 Honda Passport vehicles in the list of affected vehicles.
13

14 37. On July 12, 2021, Honda issued a second revision of its TSB No. 21-013
15 wherein Honda, under corrective action, dropped the requirement for its dealers to
16 replace the MOST service cords in affected vehicles and install the FAKRA
17 connection set only.
18

19 38. However, as evident from Plaintiff’s experience and those of other
20 consumers, and from subsequently issued Job Aid by Honda, the replacement of
21 MOST service cords FAKRA connectors failed to correct the Electrical Defect.
22

23 39. Specifically, in September 2021, Honda issued to its dealerships a Job
24 Aid titled “MOST Bus Network: Overview, Troubleshooting, and Repairs” covering
25 the 2018 and later Honda Odyssey, 2019 and later Honda Passport, and 2019 and later
26 Honda Pilot, where Honda warned its dealerships that improper connections or
27
28

1 improper harness routing may result in the Electrical Defect manifesting itself:
2 “popping or crackling noises from the speakers, a blank center display unit, or the
3 sound cutting off.”
4

5 40. Although Honda knew of such Electrical Defect at least as of August 4,
6 2020, when it published to its dealers TSB No. 20-058 (and sooner as Honda gathered
7 information and data to prepare such bulletin), Honda has not disclosed such
8 Electrical Defect to consumers.
9

10 41. Thus, the issuance of TSB No. 20-058 and No. 21-013 and amendments
11 thereto suggest a gathering of data and information regarding the Electrical Defect and
12 establishes Honda’s superior knowledge of a defect that would not be readily available
13 to the Plaintiff and other consumers.
14
15

16 **C. Honda has Actively Concealed or Suppressed the Defect**

17 42. While Honda has been fully aware of the Electrical Defect in the Class
18 Vehicles, it actively concealed the existence and nature of the defect from Plaintiff
19 and Class Members at the time of purchase, lease or repair and thereafter.
20

21 43. Specifically, Honda failed to disclose or actively concealed at and after
22 the time of purchase, lease, or repair:
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- 24 a. any and all known material defects or material nonconformity
25 of the Class Vehicles and of their electrical systems;
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- b. that the Class Vehicles were not in good in working order, were defective, and were not fit for their intended purposes; and
- c. that the Class Vehicles and their electrical systems were defective, despite the fact that Honda learned of such defects through alarming failure rates, customer complaints, as well as through other internal sources, as early as 2020.

44. Honda is, of course, currently aware that the electrical systems in the Class Vehicles are malfunctioning in record numbers. But other than instructing its dealers to replace a number of connectors, which does not cure the defect, Honda has no fix.

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

D. Honda’s New Vehicle Limited Warranty

46. Prior to purchasing his vehicle, Plaintiff relied upon Honda’s representations of a New Vehicle Limited Warranty that accompanied the sale of his vehicle, and such representations were material to Plaintiff’s decision to purchase his vehicle.

1 47. Specifically, each Class Vehicle sale or lease is accompanied with
2 Honda's 3-year / 36,000-mile New Vehicle Limited Warranty.
3

4 48. The terms of Honda's New Vehicle Limited Warranty are contained in
5 the warranty booklet that Plaintiff and all class members received at the time they
6 purchased or leased the Class Vehicles.
7

8 49. Honda's warranty booklet sets forth the terms of its New Vehicle Limited
9 Warranty as follows:³
10

11 **General Warranty Provisions**

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

18 * * *

19 **New Vehicle Limited Warranty**

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

22 **Warranty Coverage**

23 Honda will repair or replace any part that is defective in material
24 or workmanship under normal use.
25

26 ³ A true and correct copy of the New Vehicle Limited Warranty is available at
27 [https://owners.honda.com/Documentum/Warranty/Handbooks/2020_Honda_Warranty_Basebook_R
ev02_FINAL_-_SIS.pdf](https://owners.honda.com/Documentum/Warranty/Handbooks/2020_Honda_Warranty_Basebook_R
ev02_FINAL_-_SIS.pdf);
28 [https://owners.honda.com/Documentum/Warranty/Handbooks/2021_Honda_Warranty_Basebook_P
etrol_Hybrid_PHEV.pdf](https://owners.honda.com/Documentum/Warranty/Handbooks/2021_Honda_Warranty_Basebook_P
etrol_Hybrid_PHEV.pdf) (last visited Jun. 30, 2022).

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How to Get Warranty Service

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

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

51. Honda controls execution of all warranty repairs by its dealers, as it provides training, materials, special tools, diagnostic software, and replacement parts to its dealers, and demands that the warranty repairs be performed in a strict accordance with its repair guidelines, Technical Service Bulletins, Job’s Aids, and other instructions.

52. In return, Honda pays its authorized dealerships a monetary compensation for such warranty repairs.

53. Therefore, Honda’s authorized dealers are its agents for purpose of vehicle repairs, and knowledge of a defect reported to any such dealer can be imputed to Honda.

E. Allegations Applicable to Plaintiff

54. On or about December 12, 2020, Plaintiff purchased a 2020 Honda Pilot EX-L vehicle, Vehicle Identification Number 5FNYP6H56LB034714 (the “Plaintiff’s Vehicle”) from Luther Brookdale Honda in Brooklyn Center, Minnesota, an

1 authorized dealership of Honda (hereafter “Luther Brookdale Honda”), primarily for
2 his personal, family, or household purposes.
3

4 55. At the time Plaintiff purchased his vehicle, Luther Brookdale Honda
5 made representations as to the vehicle’s performance and quality and assured Plaintiff
6 that it was accompanied by Honda’s New Vehicle Limited Warranty and was free
7 from defects of workmanship.
8

9 56. Thereafter, continuing malfunctions, defects, and problems have plagued
10 the Plaintiff’s Vehicle.
11

12 57. On April 29, 2021, Plaintiff’s spouse brought Plaintiff’s Vehicle to
13 Buerkle Honda, Honda’s authorized dealership in St. Paul, Minnesota (hereafter
14 “Buerkle Honda”), and complained of crackling and popping noises coming from the
15 vehicle’s speakers.
16

17 58. Buerkle Honda found trouble codes stored and, pursuant to TSB No. 20-
18 058, replaced the FAKRA connector and MOST service cords.
19

20 59. However, Plaintiff’s Vehicle continued to suffer from the Electrical
21 Defect so on May 3, 2021, Plaintiff’s spouse returned Plaintiff’s Vehicle to Buerkle
22 Honda complaining of constant crackling and popping noises coming from the
23 vehicle’s speakers.
24

25 60. Buerkle Honda inspected the routing of all wiring harnesses, found them
26 to be in proper location, and performed no further repairs.
27
28

1 61. Following this visit, Plaintiff's Vehicle continued to suffer from the same
2
3 loud and unexpected popping and crackling noises that interrupted audio playback
4 from the vehicle's infotainment system and interrupted conversations over the
5 Vehicle's hands-free phone system.

6 62. Moreover, when the Electrical Defect occurred, it did so abruptly,
7
8 unpredictably, and without warning, while Plaintiff or Plaintiff's spouse were driving
9 the vehicle on a public roadway, startling the Plaintiff and Plaintiff's spouse, and
10 drawing their attention to the Defect and away from the roadway.

11 63. Furthermore, to stop the Defect from manifesting itself, Plaintiff and
12 Plaintiff's spouse had to pull over and shut the vehicle off, and then restart the vehicle,
13 which was only a temporary solution, until the Electrical Defect manifested itself
14 again.
15

16 64. Following the May 3, 2021, visit, Plaintiff reached out to Jake
17 Underwood, a service advisor at Buerkle Honda, again looking for a solution to the
18 Electrical Defect, but Buerkle Honda refused to accept the vehicle for repair. Mr.
19 Underwood responded that Honda had no fix for the Defect and Plaintiff should wait
20 until a fix is available.
21

22 65. Due to the unremedied Electrical Defect, Plaintiff purchased another
23 vehicle and reduced the frequency and duration with which Plaintiff and his spouse
24 drove Plaintiff's vehicle.
25
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1 66. In the ensuing months, Plaintiff continued to reach out to Buerkle Honda
2
3 to inquire about the availability of a fix for the Electrical Defect. However, having not
4 received any response, in or about March of 2022 Plaintiff filed a claim with the
5 Minnesota Office of Attorney General.

6
7 67. At about the same time, on March 31, 2022, Mr. Underwood from
8 Buerkle Honda responded to Plaintiff and advised that Honda has no new resolution
9 for the Electrical Defect.

10
11 68. In the meantime, in response to the complaint filed with the Minnesota
12 Office of Attorney General, Honda asked Plaintiff to bring his vehicle to Buerkle
13 Honda for diagnosis and inspection.

14
15 69. Shortly thereafter in April 2022, as instructed, Plaintiff brought his
16 vehicle to Buerkle Honda for diagnosis and inspection of the Electrical Defect.

17
18 70. During that visit Mr. Underwood from Buerkle Honda met with the
19 Plaintiff and told Plaintiff he was wasting his time bringing his vehicle to Buerkle
20 Honda as Honda still had no fix to the Electrical Defect. Buerkle Honda performed no
21 diagnosis, inspection or repairs during that visit.

22
23 71. By letter dated April 27, 2022, Plaintiff, via his counsel, informed Honda
24 that his vehicle continued to suffer from the Electrical Defect and that Honda's
25 authorized dealership refused to attempt further repair of his car.
26

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1 72. On June 20, 2022, Plaintiff reached out to Mr. Underwood at Buerkle
2 Honda again inquiring whether Honda came up with a fix for the Electrical Defect and
3 asking whether the electrical components Buerkle Honda had previously replaced
4 were defective and needed to be replaced again. Buerkle Honda has not responded to
5 Plaintiff.
6
7

8 73. The defects experienced by Plaintiff substantially impair the use, value,
9 and safety of his vehicle to him.
10

11 74. Plaintiff could not reasonably have discovered said nonconformities prior
12 to his acceptance of the vehicle.
13

CLASS ACTION ALLEGATIONS

A. The Class

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15
16 75. Plaintiff brings this action on his own behalf, and on behalf of a
17 nationwide class pursuant to Fed. R. Civ. P. 23(a), 23(b)(2), and/or 23(b)(3):
18

19 **Nationwide Class:** All persons or entities who purchased or leased any 2020-
20 2021 Honda Pilot (all except LX), 2020 Honda Passport (all except Sport),
21 2021 Honda Passport, and 2020 Honda Odyssey (all except LX) vehicles in the
United States.

22 76. In the alternative to the Nationwide Class, and pursuant to Fed. R. Civ. P.
23 23(c)(5), Plaintiff seeks to represent the following state-specific class:
24

25 **Minnesota Class:** All persons or entities who purchased or leased any
26 2020-2021 Honda Pilot (all except LX), 2020 Honda Passport (all except
27 Sport), 2021 Honda Passport, and 2020 Honda Odyssey (all except LX)
vehicles in the State of Minnesota (the “Minnesota Class”).
28

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

2
3 **B. Numerosity**

4 78. Upon information and belief, each of the Classes are so numerous that
5 joinder of all members is impracticable. While the exact number and identities of
6 individual members of the Classes are unknown at this time, such information being
7 in the sole possession of Defendant and obtainable by Plaintiff only through the
8 discovery process, Plaintiff believes, and on that basis alleges, that tens of thousands
9 of Class Vehicles have been sold and leased in each of the States that are the subject
10 of the Classes.
11
12

13 **C. Common Questions of Law and Fact**

14 79. There are questions of law and fact common to the Classes that
15 predominate over any questions affecting only individual Class members. These
16 questions include:
17

- 18
- 19 a. whether the Class Vehicles suffer from the Electrical Defect;
 - 20 b. whether the Electrical Defect constitutes an unreasonable safety hazard;
 - 21 c. whether Defendant knows about the Electrical Defect and, if so, how long
22 Defendant has known of the Defect;
 - 23 d. whether the defective nature of the Class Vehicles' electrical systems
24 components constitutes a material defect;
 - 25
 - 26

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1 e. whether Defendant had and has a duty to disclose the defective nature of
2 the Class Vehicles' electrical systems components to Plaintiff and the other
3 Class Members;
4

5 f. whether Plaintiff and the other Class Members are entitled to equitable
6 relief, including, but not limited to, a preliminary and/or permanent
7 injunction;
8

9 g. whether Defendant knew or reasonably should have known of the
10 Electrical Defect contained in the Class Vehicles before it sold or leased
11 them to Class Members; and
12

13 a. Whether Defendant breached its express warranty and the implied
14 warranty of merchantability, engaged in fraudulent concealment and
15 unjust enrichment, and whether Defendant violated the Minnesota
16 Consumer Fraud Act, Minn. Stat. Ann. § 325F.68, *et seq.*, and the
17 Magnuson-Moss Warranty Act, as alleged in this Complaint.
18
19

20 **D. Typicality**

21 80. The Plaintiff's claims are typical of the claims of the Classes since
22 Plaintiff purchased or leased a defective Class Vehicle, as did each member of the
23 Classes. Furthermore, Plaintiff and all members of the Classes sustained economic
24 injuries arising out of Defendant's wrongful conduct. Plaintiff is advancing the same
25 claims and legal theories on behalf of himself and all absent Class members.
26
27
28

1 **E. Protecting the Interests of the Class Members**

2 81. Plaintiff will fairly and adequately protect the interests of the Class and
3 has retained counsel experienced in handling class actions and claims involving
4 unlawful business practices. Neither Plaintiff nor his counsel has any interests which
5 might cause them not to vigorously pursue this action.
6
7

8 **F. Proceeding Via Class Action is Superior and Advisable**

9 82. A class action is the superior method for the fair and efficient
10 adjudication of this controversy. The injury suffered by each individual Class
11 member is relatively small in comparison to the burden and expense of individual
12 prosecution of the complex and extensive litigation necessitated by Defendant's
13 conduct. It would be virtually impossible for members of the Class individually to
14 redress effectively the wrongs done to them. Even if the members of the Class could
15 afford such individual litigation, the court system could not. Individualized litigation
16 presents a potential for inconsistent or contradictory judgments. Individualized
17 litigation increases the delay and expense to all parties, and to the court system,
18 presented by the complex legal and factual issues of the case. By contrast, the class
19 action device presents far fewer management difficulties, and provides the benefits of
20 single adjudication, an economy of scale, and comprehensive supervision by a single
21 court. Upon information and belief, members of the Classes can be readily identified
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1 and notified based on, inter alia, Defendant’s vehicle identification numbers, warranty
2 claims, registration records, and database of complaints.
3

4 83. Defendant has acted, and refused to act, on grounds generally applicable
5 to the Classes, thereby making appropriate final equitable relief with respect to the
6 Classes as a whole.
7

8 **FIRST CAUSE OF ACTION**
9 **Breach of Implied and Express Warranties Pursuant to the Magnuson-Moss**
10 **Warranty Act, 15 U.S.C. §2301, *et seq.***

11 **(Plaintiff on behalf of the Nationwide Class or in the alternative**
12 **on behalf of the Minnesota Class)**

13 84. Plaintiff incorporates by reference all of the above paragraphs of this
14 Complaint as though fully stated herein.

15 85. Plaintiff and members of the Classes are each a “consumer” as defined in
16 15 U.S.C. § 2301(3).
17

18 86. Defendant is a “supplier” and “warrantor” as defined in 15 U.S.C. §
19 2301(4) and (5).
20

21 87. The Class Vehicles are each a “consumer product” as defined in 15
22 U.S.C. § 2301(6). 15 U.S.C. § 2310(d)(1) provides a cause of action for any
23 consumer who is damaged by the failure of a warrantor to comply with the written and
24 implied warranties.
25

1 88. 15 U.S.C. § 2304(a)(1) requires Defendant, as a warrantor, to remedy any
2 defect, malfunction or nonconformance of the Class Vehicles within a reasonable time
3 and without charge to the Plaintiff and Class members.
4

5 89. The Defendant's sale of the defective Class Vehicles and its failure
6 and/or refusal to repair the Class Vehicles' Electrical Defect within a reasonable
7 period of time during the applicable warranty periods constitutes a breach of the
8 written and implied warranties applicable to the Class Vehicles.
9

10 90. Despite repeated demands, Defendant has failed to remedy the Class
11 Vehicles' defects within a reasonable time, and/or a reasonable number of attempts,
12 thereby breaching the written and implied warranties applicable to the Class Vehicles.
13

14 91. As a result of Defendant's breaches of the written and implied warranties,
15 and Defendant's failure to remedy the same within a reasonable time, Plaintiff and
16 class members have suffered damage.
17

18
19 **SECOND CAUSE OF ACTION**
20 **Fraudulent Concealment**

21 **(Plaintiff on behalf of the Nationwide Class or in the alternative**
22 **on behalf of the Minnesota Class)**

23 92. Plaintiff incorporates by reference all allegations contained in this
24 Complaint as though fully stated herein.
25

26 93. By failing to disclose and concealing the defective nature of the Class
27 Vehicles' electrical systems components from Plaintiff and Class Members, Honda
28

1 concealed and suppressed material facts concerning the performance and quality of
2 the Class Vehicles.
3

4 94. Defendant knew that the Class Vehicles' electrical systems components
5 suffered from an inherent defect, were defectively manufactured or made, would fail
6 prematurely, and were not suitable for their intended use.
7

8 95. Defendant was under a duty to Plaintiff and the Class Members to
9 disclose the defective nature of the Class Vehicles' electrical systems components
10 and/or the associated repair costs because:
11

12 a. Defendant was in a superior position to know the true state of facts about
13 the safety defect contained in the Class Vehicles' electrical systems
14 components;
15

16 b. Plaintiff and the Class Members could not reasonably have been expected
17 to learn or discover that the electrical systems components in their vehicles
18 have a dangerous safety defect until after they purchased or leased the
19 Class Vehicles; and,
20

21 c. Defendant knew that Plaintiff and the Class Members could not reasonably
22 have been expected to learn about or discover the Electrical Defect.
23

24 96. On information and belief, Honda still has not made full and adequate
25 disclosures and continues to defraud consumers by concealing material information
26 regarding the Electrical Defect and the performance and quality of Class Vehicles.
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1 97. The facts concealed or not disclosed by Defendant to Plaintiff and Class
2 Members are material in that a reasonable person would have considered them to be
3 important in deciding whether or not to purchase the Class Vehicles.
4

5 98. Plaintiff and the Class relied on Defendant to disclose material
6 information it knew, such as the defective nature of the electrical systems components
7 in the Class Vehicles, and not to induce them into a transaction they would not have
8 entered had the Defendant disclosed this information.
9

10 99. By failing to disclose the Electrical Defect, Defendant knowingly and
11 intentionally concealed material facts and breached its duty not to do so.
12

13 100. The facts concealed or not disclosed by Defendant to Plaintiff and the
14 other Class Members are material because a reasonable consumer would have
15 considered them to be important in deciding whether or not to purchase the Class
16 Vehicles, or to pay less for them.
17

18 101. Had Plaintiff and other Class Members known that the Class Vehicles
19 suffer from the Electrical Defect, they would not have purchased the Class Vehicles or
20 would have paid less for them.
21

22 102. Plaintiff and the other Class Members are reasonable consumers who do
23 not expect that their vehicles will suffer from a Electrical Defect. That is the
24 reasonable and objective consumer expectation for vehicles.
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1 103. As a result of Defendant’s misconduct, Plaintiff and the other Class
2 Members have been harmed and have suffered actual and economic damages in that
3 the Class Vehicles are defective and require repairs or replacement parts and are worth
4 less money because of the Defect.
5

6 104. Accordingly, Honda is liable to Plaintiff and Class Members for damages
7 in an amount to be proven at trial.
8

9 105. Honda’s actions and omissions were done maliciously, oppressively,
10 deliberately, with intent to defraud, and in reckless disregard of Plaintiff’s and the
11 Class’s rights and well-being, to enrich Honda. Honda’s conduct warrants an
12 assessment of punitive damages in an amount sufficient to deter such conduct in the
13 future, which amount is to be determined according to proof.
14
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16 106. Furthermore, as the intended and expected result of its fraud and
17 conscious wrongdoing, Honda has profited and benefited from Plaintiff’s and Class
18 Members’ purchase of Class Vehicles containing the Electrical Defect. Honda has
19 voluntarily accepted and retained these profits and benefits with full knowledge and
20 awareness that, as a result of Honda’s misconduct alleged herein, Plaintiff and Class
21 Members were not receiving vehicles of the quality, nature, fitness, or value that had
22 been represented by Honda, and that a reasonable consumer would expect.
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26 107. Honda has been unjustly enriched by its fraudulent, deceptive, and
27 otherwise unlawful conduct in connection with the sale and lease of Class Vehicles
28

1 and by withholding benefits from Plaintiff and Class Members at the expense of these
2 parties. Equity and good conscience militate against permitting Honda to retain these
3 profits and benefits, and Honda should be required to make restitution of its ill-gotten
4 gains resulting from the conduct alleged herein.
5

6
7 **THIRD CAUSE OF ACTION**
8 **Unjust Enrichment**

9 **(Plaintiff on behalf of the Nationwide Class or in the alternative**
10 **on behalf of the Minnesota Class)**

11 108. Plaintiff incorporates by reference all allegations contained in this
12 Complaint as though fully stated herein.

13 109. Honda has long known that about the Electrical Defect which it
14 concealed and failed to disclose to Plaintiff and Class Members.
15

16 110. As a result of its fraudulent acts and omissions related to the Electrical
17 Defect, Honda obtained monies which rightfully belong to Plaintiff and the Class
18 Members to the detriment of Plaintiff and Class Members.
19

20 111. Honda appreciated, accepted, and retained the non-gratuitous benefits
21 conferred by Plaintiff and the proposed Class Members who, without knowledge of
22 the Electrical Defect, paid a higher price for their vehicles which actually had lower
23 values. Honda also received monies for vehicles that Plaintiff and the Class Members
24 would not have otherwise purchased or leased.
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1 112. It would be inequitable and unjust for Honda to retain these wrongfully
2 obtained profits.
3

4 113. Honda's retention of these wrongfully obtained profits would violate the
5 fundamental principles of justice, equity, and good conscience.
6

7 114. As a result of Defendant's unjust enrichment, Plaintiff and Class
8 Members have suffered damages.
9

10 115. Plaintiff does not seek restitution under his Unjust Enrichment claim.
11 Rather, Plaintiff and Class Members seek non-restitutionary disgorgement of the
12 financial profits that Defendant obtained as a result of its unjust conduct.
13

14 116. Additionally, Plaintiff seeks injunctive relief to compel Defendant to
15 offer, under warranty, remediation solutions that Defendant identifies. Plaintiff also
16 seeks injunctive relief enjoining Defendant from further deceptive distribution, sales,
17 and lease practices with respect to Class Vehicles, enjoining Defendant from selling
18 the Class Vehicles with misleading information concerning the Electrical Defect;
19 compelling Defendant to provide Class members with adequate repairs or with
20 replacement components that do not contain the defects alleged herein; and/or
21 compelling Defendant to reform its warranty, in a manner deemed to be appropriate
22 by the Court, to cover the injury alleged and to notify all Class Members that such
23 warranty has been reformed. Money damages are not an adequate remedy for the
24 above requested non-monetary injunctive relief.
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FOURTH CAUSE OF ACTION
Violation of the Minnesota Consumer Fraud Act,
Minn. Stat. Ann. § 325F.68, *et seq.*

(Plaintiff on behalf of the proposed Minnesota Class)

117. Plaintiff incorporates by reference all allegations contained in this Complaint as though fully stated herein.

118. Plaintiff, the Minnesota Class Members, and Defendant are each a “person” under Minn. Stat. Ann. § 325F.68(3).

119. The Class Vehicles are “merchandise” under Minn. Stat. Ann. § 325F.68(2).

120. At all relevant times, Defendant has engaged in “sale” under Minn. Stat. Ann. § 325F.68(4) by advertising, offering for sale, selling, leasing, and/or distributing vehicles in the United States, including in Minnesota, directly or indirectly affecting Minnesota citizens through that trade and commerce.

121. The allegations set forth herein constitute unfair and deceptive acts and practices in violation of the Minnesota Consumer Fraud Act, Minn. Stat. Ann. § 325F.68, *et seq.*

122. By failing to disclose and concealing the Electrical Defect from Plaintiff and the Minnesota Class Members, Defendant violated the Minnesota Consumer Fraud Act, because, *inter alia*, Defendant represented that the Class Vehicles had characteristics and benefits that they do not have, represented that the Class Vehicles

1 were of a particular standard, quality, or grade when they were of another, and
2 advertised the Class Vehicles with the intent not to sell them as advertised.
3

4 123. Defendant's unfair and deceptive acts and practices occurred repeatedly
5 in Defendant's trade or business, were capable of deceiving a substantial portion of
6 the purchasing public and imposed a serious safety risk on the public.
7

8 124. Defendant knew that the Class Vehicles suffer from the Electrical Defect,
9 were defectively manufactured or made, and were not suitable for their intended use.
10

11 125. Defendant was under a duty to Plaintiff and the Minnesota Class
12 Members to disclose the Electrical Defect because:

- 13 a. Defendant was in a superior position to know the true state of facts about
14 the Electrical Defect contained in the Class Vehicles;
15
16 b. Plaintiff and the Minnesota Class Members could not reasonably have
17 been expected to learn or discover that their vehicles have a dangerous
18 safety defect until after they purchased or leased the Class Vehicles; and,
19
20 c. Defendant knew that Plaintiff and the Minnesota Class Members could not
21 reasonably have been expected to learn about or discover the Electrical
22 Defect.
23

24 126. The facts concealed or not disclosed by Defendant to Plaintiff and the
25 Minnesota Class Members are material in that a reasonable person would have
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1 considered them to be important in deciding whether or not to purchase the Class
2 Vehicles.
3

4 127. Plaintiff and the Minnesota Class Members relied on Defendant to
5 disclose material information it knew, such as the Electrical Defect in the Class
6 Vehicles, and not to induce them into a transaction they would not have entered had
7 the Defendant disclosed this information.
8

9 128. By failing to disclose the Electrical Defect, Defendant knowingly and
10 intentionally concealed material facts and breached its duty not to do so.
11

12 129. Moreover, Defendant's intentional concealment of and failure to disclose
13 the Electrical Defect constitutes an unfair and deceptive act and practice because, to
14 the detriment of Plaintiff and the Minnesota Class Members, that conduct took
15 advantage of Plaintiff and the Minnesota Class Members' lack of knowledge, ability,
16 and experience to a grossly unfair degree. Defendant's unfair and deceptive trade
17 practices were a producing cause of the economic damages sustained by Plaintiff and
18 the Minnesota Class Members.
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21 130. The facts concealed or not disclosed by Defendant to Plaintiff and the
22 Minnesota Class Members are material because a reasonable consumer would have
23 considered them to be important in deciding whether or not to purchase the Class
24 Vehicles, or to pay less for them.
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1 131. Had Plaintiff and the Minnesota Class Members known that the Class
2 Vehicles would suffer from the Electrical Defect, they would not have purchased the
3 Class Vehicles or would have paid substantially less for them.

5 132. Plaintiff and the Minnesota Class Members are reasonable consumers
6 who do not expect that their vehicles will suffer from a Electrical Defect. That is the
7 reasonable and objective consumer expectation for vehicles.

9 133. As a result of Defendant's misconduct, Plaintiff and the Minnesota Class
10 Members have been harmed and have suffered actual and economic damages in that
11 the Class Vehicles are defective and require repairs or replacement and are worth less
12 money because of the Defect.

14 134. Plaintiff has provided adequate notice to Defendant.

16 135. Plaintiff and the Minnesota Class Members should be awarded punitive
17 damages because Defendant intentionally concealed and failed to disclose the
18 defective nature of the Class Vehicles.

20 **FIFTH CAUSE OF ACTION**

21 **Breach of the Implied Warranty of Merchantability under**
22 **Minn. Stat. Ann. § 336.2-314**

23 **(Plaintiff on behalf of the proposed Minnesota Class)**

24 136. Plaintiff incorporates by reference all allegations contained in this
25 Complaint as though fully stated herein.
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1 137. Defendant is a merchant with respect to motor vehicles.

2 138. The Class Vehicles were subject to implied warranties of merchantability
3 running from the Defendant to Plaintiff and the Minnesota Class Members.
4

5 139. An implied warranty that the Class Vehicles were merchantable arose by
6 operation of law as part of the sale or lease of the Class Vehicles.
7

8 140. Defendant breached the implied warranty of merchantability in that the
9 Class Vehicles suffer from the defects referenced herein and thus were not in
10 merchantable condition when Plaintiff and the Minnesota Class Members purchased
11 or leased the Class Vehicles, or at any time thereafter, and the Class Vehicles are unfit
12 for the ordinary purposes for which such vehicles are used. Specifically, the Class
13 Vehicles were and are not fit for their ordinary purpose of providing reasonably
14 reliable and safe transportation because the Class Vehicles suffer from the Electrical
15 Defect that causes driver distraction and thus makes driving unreasonably dangerous.
16
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18 141. As a result of Defendant's breach of the applicable implied warranties,
19 owners and lessees of the Class Vehicles suffered an ascertainable loss of money,
20 property, and/or value of their Class Vehicles. Defendant's actions, as complained of
21 herein, breached the implied warranty that the Class Vehicles were of merchantable
22 quality and fit for such use.
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SIXTH CAUSE OF ACTION
Breach of Express Warranty under Minn. Stat. Ann. § 336.2-313
(Plaintiff on behalf of the proposed Minnesota Class)

142. Plaintiff incorporates by reference all allegations contained in this Complaint as though fully stated herein.

143. In connection with the sale or lease of the Class Vehicles, Defendant provided Plaintiff and the Minnesota Class Members with its New Vehicle Limited Warranty where it promised to repair defective parts within 4 years or 50,000 miles in service, whichever comes first, and with extended warranty where it promised to repair Electrical Defect within 5 years or 60,000 miles from the original date of purchase, whichever comes first.

144. Plaintiff and the Minnesota Class Members relied on Defendant’s warranties when they agreed to purchase or lease the Class Vehicles and Defendant’s warranties were part of the basis of the bargain.

145. Plaintiff and the Minnesota Class Members submitted their Vehicles for warranty repairs as referenced herein. Defendant failed to comply with the terms of the express written warranties provided to each Class member, by failing to repair the Electrical Defect under the vehicle’s warranties within a reasonable period of time as described herein.

1 146. Plaintiff and the Minnesota Class Members have given Defendant
2 reasonable opportunities to cure said defect, but Defendant has been unable and/or has
3 refused to do so within a reasonable time.
4

5 147. As a result of said nonconformities, Plaintiff and the Minnesota Class
6 Members cannot reasonably rely on the Class Vehicles for the ordinary purpose of
7 safe, reliable, comfortable, and efficient transportation.
8

9 148. Plaintiff and the Minnesota Class Members could not reasonably have
10 discovered said nonconformities with the Class Vehicles prior to Plaintiff and the
11 Minnesota Class Members' acceptance of the Class Vehicles.
12

13 149. Plaintiff and the Minnesota Class Members would not have purchased or
14 leased the Class Vehicles, or would have paid less for the Class Vehicles, had they
15 known, prior to their respective time of purchase or lease, that Class Vehicles
16 contained the Electrical Defect.
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19 150. As a direct and proximate result of the willful failure of Defendant to
20 comply with its obligations under the express warranties, Plaintiff and the Minnesota
21 Class Members have suffered actual and consequential damages. Such damages
22 include, but are not limited to, the loss of the use and enjoyment of their vehicles, and
23 a diminution in the value of the vehicles containing the defects identified herein.
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PRAYER FOR RELIEF

WHEREFORE, Plaintiff, on behalf of himself and all others similarly situated, prays for judgment against Defendant as follows:

- A. An order certifying the proposed Classes, designating Plaintiff as named representatives of the respective Classes, and designating the undersigned as Class Counsel;
- B. An order approving revocation of acceptance of the Class Vehicles;
- C. Money damages, in the form of a refund of the full contract price, including trade-in allowance, taxes, fees, insurance premiums, interest, and costs, and a refund of all payments made by Plaintiff and class members on the subject contracts;
- D. Equitable relief including, but not limited to, replacement of the Class Vehicles with new vehicles, or repair of the defective Class Vehicles with an extension of the express warranties and service contracts which are or were applicable to the Class Vehicles, in the event that Plaintiff and Class members are not found to be entitled to revocation;
- E. A declaration requiring Defendant to comply with the various provisions of the state and federal consumer protection statutes herein alleged and to make all the required disclosures;
- F. Incidental and consequential damages;

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G. Punitive damages;

H. Reasonable attorneys' fees and costs;

I. Pre-judgment and post-judgment interest, as provided by law;

J. Plaintiff demands that Defendant perform a recall, and repair all Class Vehicles; and

K. Such other and further relief as this Court deems just and proper.

TRIAL BY JURY DEMANDED ON ALL COUNTS

DATED: July 1, 2022

TRINETTE G. KENT

By: /s/ Trinette G. Kent
Trinette G. Kent, Esq.
Lemberg Law, LLC
Attorneys for Plaintiff

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AFFIDAVIT OF TRINETTE G. KENT

I, Trinette G. Kent, declare as follows:

1. I am an attorney with the law firm of Lemberg Law, LLC, counsel for Plaintiff in this action. I am admitted to practice law in California and before this Court, and am a member in good standing of the State Bar of California. This declaration is made pursuant to California Civil Code section 1780(d). I make this declaration based on my research of public records and upon personal knowledge and, if called upon to do so, could and would testify competently thereto.

2. Venue is proper in this Court because Plaintiff suffered injuries as a result of Defendant's acts in this District, including, inter alia, Defendant's act of creating, approving, and disseminating the above-referenced Honda's New Vehicle Limited Warranty, Extended Warranty, and online/printed marketing materials from its Torrance, California headquarters, which gave rise to this action and occurred in this District, and Defendant (1) is headquartered in this District, (2) is authorized and registered to conduct business in this District and has intentionally availed itself of the laws and markets of this District through the distribution and sale of its vehicles in this District, and (3) is subject to personal jurisdiction in this District.

3. Plaintiff a resident of Lake Elmo, Washington County, Minnesota.

4. Defendant is a California registered corporation with its principal place of business located at 1919 Torrance Boulevard, Torrance, California 90501-2746.

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I declare under penalty of perjury under the laws of the United States and the State of California this 1st day of July, 2022, in Phoenix, Arizona, that the foregoing is true and correct.



Trinette G. Kent

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Hear a Popping Noise? Class Action Says Honda Pilot, Passport, Odyssey Plagued by Sound System Defect](#)
