

Laura Gipe Christian

Birth Mother of Amber Marie Rose

Harwood, Maryland

February 29, 2016

Federal Trade Commission
Office of the Secretary
Room CC-5610 (Annex D)
600 Pennsylvania Avenue, NW
Washington, DC 20580

**Re: General Motors LLC,- Consent Agreement, File No. 152-3101;
Jim Koons Management Company - Consent Agreement, File No. 152-3104; and
Lithia Motors, Inc.,- Consent Agreement, File No. 152-3102**

Dear Commissioners of the U.S. Federal Trade Commission:

My name is Laura Christian. I am the birth mother of Amber Marie Rose. Amber was one of the first killed due to the General Motors (GM) ignition switch defect: a defect that GM knew about for over a decade. As a result hundreds were killed and even thousands were injured. The truth is that because the defect was hidden for so long we will never know how many lives were ended or affected.

Before becoming disabled I worked for the federal government in consumer protection. Many of these protections were founded on disclosure. In my personal opinion from what I have seen throughout my career, disclosure

acts as little more than license by bad actors to pass the buck down the line. I have heard many “targets” claim that the consumer understood the risks just because they signed the necessary disclosure forms. Forms many have told me that they did not understand. Consumers relied upon the very people that preyed upon them. And why is it that the FTC expects that in the car buying process the effect will be any different? How many consumers are experts when it comes to auto safety? If the NHTSA and the auto manufacturer have declared it necessary to recall a vehicle, why are dealers permitted to “override” sound judgment?

The FTC should not allow dealers to sell unsafe recalled used cars under any circumstances, let alone when the dealer advertises that their cars have passed a “rigorous inspection” and qualified to be sold as so-called “certified” cars. Disclosure passes the liability to consumers. Right now if a dealer sold an unrepaired recalled car the dealer retains the liability for selling a dangerous product. If they are permitted to sell under new FTC guidelines, that liability is passed on to consumers. Consumers that do not necessarily comprehend the risk they are assuming.

If the FTC's proposed settlements had been in effect when Amber was buying a car, they would not have saved my daughter. Had she even noticed and read a “disclosure” about the recall, Amber, only 16, would not have been equipped to accurately assess the risk involved. If she had been told verbally that

the defect did not pose a serious hazard, in all likelihood she would have believed it.

Make no mistake. Allowing the sales of recalled used cars with “disclosure” would protect car dealers, not consumers. All recalled used cars should be safe from the moment they leave the car dealer's lot.

Americans are counting on you to do the right thing and protect their lives.
Thank you.

Sincerely,

Laura Gipe Christian