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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 IN RE: VOLKSWAGEN “CLEAN DIESEL”
12 MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

MDL NO. 2672 CRB (JSC)

**FTC’S STATEMENT SUPPORTING
THE 3.0L “CLEAN DIESEL”
CONSUMER SETTLEMENTS**

13 _____
14 This document relates to:

Hon. Charles R. Breyer

15 ALL ACTIONS
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17 As part of its effort to protect American consumers, the Commission voted unanimously
18 to approve the proposed FTC Order, which resolves its claims concerning 3.0-liter vehicles with
19 “Clean Diesel” TDI engines. Volkswagen employed defeat devices in its TDI engines to cheat
20 on emissions tests and deceived consumers through its extensive and brazenly false “Clean
21 Diesel” marketing campaign. Along with the Plaintiffs Steering Committee’s (“PSC’s”)
22 companion settlement, this joint consumer resolution fully compensates “Clean Diesel” owners
23 through a comprehensive package of monetary relief and other consumer-friendly provisions.
24 As explained below, the restitution includes a buyback at favorable prices for consumers with
25 older vehicles. For consumers with newer cars, Volkswagen must repair them to meet emissions
26 standards without materially affecting fuel economy or power, and pay additional restitution.
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1 **Model Years 2009-2012**

2 With respect to older cars, the FTC Order requires Volkswagen to offer to buy back all
3 3.0-liter TDI engine vehicles from model years 2009-2012. The buyback has important
4 consumer-friendly features:

- 5 ■ The buyback prices are based on retail¹ prices in September 2015—
6 approximately two months before it became clear that the defeat device
7 scandal affected 3.0-liter vehicles.²
- 8 ■ In addition to September 2015 Clean Retail, consumers will receive a
9 restitution payment to compensate for their economic losses. *See Ex. A*
10 (listing approximate restitution ranges).

11 Importantly, consumers will receive September 2015 retail value (plus compensation) even if
12 Volkswagen does not repurchase their cars until as late as 2019.³

13 **Model Years 2013-2016**

14 For owners of TDI engine vehicles from model years 2013-2016, the FTC Order ensures
15 that consumers will receive the car they thought they purchased.⁴ First, these owners will

16 ¹ Specifically, the FTC used National Association of Automobile Dealers (“NADA”) “Clean Retail” figures. “Clean Retail” represents the price a consumer “could reasonably pay for a vehicle [in good condition] at a dealer’s lot,” as opposed to “Clean Trade,” which is the amount consumers could expect to receive when trading in a comparable vehicle in good condition. *See* www.nada.com/b2b/support/glossary.aspx (viewed Jan. 26, 2017). Because dealers mark up trade-ins before resale, Clean Retail is always higher than Clean Trade. Additionally, for 2015 and 2016 vehicles that NADA did not yet catalog in September 2015, the FTC used a generous, consumer-friendly inferred value to ensure these owners receive full compensation.

21 ² The Environmental Protection Agency (“EPA”) issued a Notice of Violation (“NOV”) concerning 2.0-liter TDI engine vehicles in September 2015. EPA issued an NOV concerning 3.0-liter vehicles in November 2015.

23 ³ If EPA and CARB approve an emissions Modification, owners of 3.0-liter TDI engine vehicles from model years 2009-2012 will also have the choice to obtain that Modification free under the FTC Order and the related DOJ settlement of environmental claims, along with as much as \$15,380 in additional restitution. *See Ex. A*. The Approved Emissions Modification (“Modification”) would improve vehicle emissions but not render them fully compliant. Notably, the FTC Order and DOJ Consent Decree use different terminology, but both documents and the PSC Settlement distinguish between technical changes that would reduce NOx but not achieve full compliance (or reduce other emissions), on one hand, and technical changes that would achieve full compliance, on the other.

1 receive a Certified Emissions Repair (“Repair”) at no cost. Unlike an Approved Emissions
2 Modification (“Modification”), a Repair must fully restore the vehicle to the emissions standard
3 Volkswagen originally promised consumers (a Modification reduces nitrogen oxide (NOx)
4 emissions but not to the standards to which they were originally certified). Second, the FTC
5 Order requires Volkswagen to accomplish this full Repair without materially diminishing the
6 vehicles’ performance (fuel economy, torque, and horsepower – attributes important to “Clean
7 Diesel” purchasers). Third, these consumers will receive restitution ranging from more than
8 \$8,539 to \$17,614.⁵ See Ex. A (restitution ranges).⁶ Simply put, these consumers will have the
9 car they thought they purchased—in terms of emissions, fuel economy, torque, and
10 horsepower—along with significant financial restitution that will fully compensate them.⁷

11 **Other Consumer-Friendly Order Provisions**

12 The FTC Order (and PSC Settlement) includes important additional consumer-friendly
13 provisions:
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16 ⁴ These 2013-2016 vehicles include one Porsche model, one Volkswagen model, and
several Audi models.

17 ⁵ Consumers with newer vehicles who elect to participate in the settlement may receive
18 half of their restitution in advance, before their vehicle undergoes a Repair. FTC Order § IX(A).

19 ⁶ The global consumer settlement’s restitution figures include approximately \$276.5
20 million for consumers from Bosch, which manufactured the defeat device Volkswagen used.
The FTC engaged with Bosch and allocated Bosch’s contribution among consumers in an
equitable manner that the Commission determined reflects the public interest.

21 ⁷ If Volkswagen cannot fully and timely Repair the vehicles’ emissions according to a set
22 timetable, then these owners will have their cars bought back using September 2015 Clean Retail
23 prices plus additional restitution (they may also have the option to accept a partial repair – an
24 emissions Modification – if one exists, plus additional restitution). If Volkswagen’s Repairs
25 diminish fuel economy by more than 3 MPG, torque by more than 5%, or horsepower by more
26 than 5%, then Volkswagen must make an automatic extra payment to consumers. FTC Order §
27 VIII(B). Additionally, there are two other protections against reduced performance. First,
whether or not these three specific triggers apply, the existing FTC Order restitution amounts
provide compensation for some reduced performance (including other performance attributes).
Second, depending on the severity of the reduced performance, Volkswagen could face
additional remedies the Court directs, including free repairs, further compensation, or even a full
buyback. FTC Order § VIII(B).

- 1 ▪ **Loan Forgiveness.** Consumers eligible for a buyback but with loan
2 balances exceeding their vehicle’s value may receive loan forgiveness up
3 to 130% of the vehicle’s full buyback amount.⁸
- 4 ▪ **Relief for American Servicemembers.** The FTC Order ensures that
5 members of our armed forces serving abroad must receive the same (or
6 substantially equivalent) benefits as everyone else—even if Volkswagen
7 must pay additional expenses associated with buying back vehicles or
8 making Repairs to vehicles overseas.⁹
- 9 ▪ **Protection for Consumers in Rural Areas and Hawaiian Residents.**
10 The FTC Order ensures that Volkswagen must provide the Order’s
11 benefits (or substantially equivalent benefits) to eligible consumers whose
12 geographic location unduly burdens their ability to participate (such as
13 consumers who reside on Hawaiian islands without a dealer, or rural
14 residents residing a significant distance from the nearest dealer).
15 Volkswagen is responsible for any associated costs.¹⁰
- 16 ▪ **Restitution for Consumers Who Sold After the Scandal Broke.** Many
17 consumers—understandably offended by Volkswagen’s emissions
18 cheating and unwilling to drive a polluting vehicle—sold their vehicles
19 shortly after the scandal broke. This created a “firesale” situation where,
20 due to the scandal, these consumers had no choice but to accept depressed
21 prices for their cars. The FTC Order provides these consumers with
22 substantial compensation.¹¹
- 23 ▪ **Compensation for Lessees.**¹² The FTC Order provides substantial
24 restitution for lessees of 3.0-liter TDI vehicles. These consumers were
25 also affected by Volkswagen’s deceptive marketing. Additionally, certain
26 lessees have the option to terminate their leases without any early
27 termination penalties.
- 28 ▪ **Pro-Rated Extended Warranty Refunds.** Many consumers who
 purchased “Clean Diesel” vehicles also bought expensive extended
 warranties or service plans that they cannot use after Volkswagen buys
 back their car. The FTC Order provides consumers with pro-rated refunds
 for the unused portions of service contracts or extended warranties.¹³
- **Warranty and Lemon Law Protection.** The FTC Order provides
 consumers who receive Modifications to their emissions systems or full

⁸ FTC Order § IV(G)(1).

⁹ *Id.* § XVI(C)(7).

¹⁰ *Id.*

¹¹ *Id.* § XIV.

¹² *Id.* §§ VI, XII-XIII.

¹³ *Id.* § XV(O).

Repairs with a robust warranty covering any vehicle components that the Repair (or Modification) might reasonably affect.¹⁴ Most importantly, if Volkswagen cannot fix the vehicles after several attempts, Volkswagen must offer to buy them back at favorable prices.¹⁵

- **Other Consumer-Friendly Provisions.** Among other things, the proposed FTC Order (1) imposes stringent claims processing deadlines;¹⁶ (2) appoints a neutral, independent Claims Supervisor to monitor and report on Volkswagen’s compliance;¹⁷ (3) requires Volkswagen to offer consumers multiple choices as to when they bring their vehicle to the dealer for a buyback, Repair, or Modification (and allows consumers to choose the dealer);¹⁸ (4) requires Volkswagen to offer a loaner vehicle for Repairs or Modifications that take longer than three hours;¹⁹ (5) requires Volkswagen to offer consumers the option to receive restitution through an Electronic Funds Transfer (“EFT”);²⁰ and (6) prohibits Volkswagen from using information it collects during the claims process for any other purpose (such as marketing).²¹

In short, the FTC Order is clearly in the public interest. Indeed, if it were not, the FTC would never have approved it. *See, e.g., United States v. Cannons Eng’g Corp.*, 899 F.2d 79, 84 (1st Cir. 1990) (explaining that deference is appropriate “where, as here, a government actor committed to the protection of the public interest has pulled the laboring oar in constructing the proposed settlement”) (citing *FTC v. Standard Fin. Mgmt. Corp.*, 830 F.2d 404, 408 (1st Cir. 1987) (discussing need for judicial deference “to the agency’s determination that the settlement is appropriate”)); *State of California Dep’t of Toxic Substances Control v. Waymire Drum Co.*, No. C-98-03834, 1999 WL 169536, *2 (N.D. Cal. Mar. 19, 1999) (quoting *Cannons*; “The presumption in favor of settlement is particularly strong where a consent decree has been negotiated by a governmental agency specially equipped, trained, or oriented in the field.”). As

¹⁴ *Id.* § XV(A).

¹⁵ *Id.* § XV(L).

¹⁶ *Id.* § XVI.

¹⁷ *Id.* § XVII.

¹⁸ *Id.* § XVII(C)(4).

¹⁹ *Id.* § XI(F).

²⁰ *Id.* § XVI(D).

²¹ *Id.* at XVII(C)(10).

1 the federal agency with a statutory mandate to protect consumers, the FTC urges the Court to
2 enter both consumer settlements quickly so that redress can begin.
3

4 Dated: January 31, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Jonathan Cohen, hereby certify that on January 31, 2017, I caused to be served true copies of the foregoing by electronic means, by filing such documents through the Court's Electronic Case Filing System.



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Exhibit A

VW 3.0L SETTLEMENT PAYMENTS

The tables below show the range of possible payments for Eligible Owners, Lessees, and Former Eligible Owners. The amounts are approximate, before adding or subtracting any mileage adjustment. They reflect total payments by both VW and Bosch, and assume consumers elect to receive both payments.

To determine your exact amount and to calculate any mileage adjustment, visit VWCourtSettlement.com.

These tables are split into three parts:

- I. Payments for Generation 1 (Model Years 2009-2012)
- II. Payments for Generation 2 (Model Years 2013-2016) if a Certified Repair is timely available
- III. Payments for Generation 2 (Model Years 2013-2016) if a Certified Repair is not timely available

The payments depend on which option is available for a particular vehicle, and which option the consumer chooses. The following options are available under the settlement:

	GENERATION 1	GENERATION 2
MAKE & MODEL	VW Touareg (2009-2012) Audi Q7 (2009-2012)	VW Touareg (2013-2016) Audi A6 quattro (2014-2016) Audi A7 quattro (2014-2016) Audi A8, A8L (2014-2016) Audi Q5 (2014-2016) Audi Q7 (2013-2015) Porsche Cayenne (2013-2016)
OWNERS	Buyback OR Approved Emissions Modification	Certified Emissions Repair*
LESSEES	Lease Termination OR Approved Emissions Modification	Certified Emissions Repair*

*If a Certified Emissions Repair is **NOT** timely available, Generation 2 owners/lessees will have a choice of a Buyback or Lease termination OR an Approved Emissions Modification, if one is approved.

An **Approved Emissions Modification** will reduce the vehicle’s NOx emissions, but will not make it compliant with the originally certified standards. A **Certified Emissions Repair** will make the car fully compliant with the originally certified emission standards. Modification and repair options will only be available if approved by EPA and CARB.

I. PAYMENTS FOR GENERATION 1 OWNERS/LESSEES (MODEL YEARS 2009-2012)

OWNERS: OPTION OF BUYBACK OR APPROVED EMISSIONS MODIFICATION

LESSEES: OPTION OF LEASE TERMINATION OR APPROVED EMISSIONS MODIFICATION

VOLKSWAGEN OWNERS (2009-2012 Touareg)

Model Year	Model and Trim	Buyback	Approved Emissions Modification	Former Owners
2009	VW Touareg Utility 4D TDI	\$26,255 - \$30,990	\$9,255 - \$11,500	\$4,628 - \$5,919
2010	VW Touareg Utility 4D TDI	\$27,905 - \$33,468	\$9,780 - \$12,493	\$4,890 - \$6,399
2011	VW Touareg Utility 4D TDI Executive	\$40,655 - \$44,440	\$9,630 - \$13,115	\$4,815 - \$6,663
	VW Touareg Utility 4D TDI Lux	\$37,255 - \$40,700	\$9,505 - \$12,650	\$4,753 - \$6,481
	VW Touareg Utility 4D TDI Sport	\$35,380 - \$38,638	\$9,455 - \$12,413	\$4,728 - \$6,370
2012	VW Touareg Utility 4D TDI Executive	\$45,155 - \$49,500	\$9,755 - \$13,700	\$4,878 - \$7,045
	VW Touareg Utility 4D TDI Lux	\$41,155 - \$45,100	\$9,630 - \$13,175	\$4,815 - \$6,745
	VW Touareg Utility 4D TDI Sport	\$38,555 - \$42,240	\$9,555 - \$12,840	\$4,778 - \$6,543
	VW Touareg Utility 4D TDI Sport w/ Nav.	\$39,280 - \$43,038	\$9,580 - \$12,938	\$4,790 - \$6,625

AUDI OWNERS (2009-2012 Q7)

Model Year	Model and Trim	Buyback	Approved Emissions Modification	Former Owners
2009	Audi Q7 Utility 4D 3.0 TDI Premium	\$32,288 - \$33,734	\$10,128 - \$11,534	\$5,043 - \$5,959
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$31,905 - \$35,145	\$9,330 - \$11,970	\$4,665 - \$6,125
	Audi Q7 Utility 4D 3.0 TDI Premium Plus S-Line	\$34,180 - \$37,037	\$9,405 - \$12,012	\$4,703 - \$6,177
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$32,980 - \$36,109	\$9,380 - \$11,909	\$4,690 - \$6,248
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$35,230 - \$38,418	\$9,455 - \$12,393	\$4,728 - \$6,365
2010	Audi Q7 Utility 4D 3.0 TDI Premium	\$34,355 - \$37,074	\$9,430 - \$11,899	\$4,715 - \$6,045
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$36,055 - \$39,793	\$9,480 - \$12,543	\$4,740 - \$6,449
	Audi Q7 Utility 4D 3.0 TDI Premium Plus S-Line	\$38,555 - \$41,841	\$9,605 - \$12,566	\$4,803 - \$6,566
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$37,530 - \$43,837	\$9,530 - \$13,100	\$4,765 - \$6,594
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$39,805 - \$46,264	\$9,630 - \$13,289	\$4,815 - \$6,842
2011	Audi Q7 Utility 4D 3.0 TDI Premium	\$38,962 - \$42,264	\$9,380 - \$12,243	\$4,690 - \$6,417
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$39,055 - \$43,313	\$9,405 - \$12,813	\$4,703 - \$6,473

Amounts reflect the total payments by VW and Bosch. Ranges are before any mileage adjustments. To determine your exact amount and to calculate any mileage adjustment, visit VWCourtSettlement.com.

Model Year	Model and Trim	Buyback	Approved Emissions Modification	Former Owners
2011	Audi Q7 Utility 4D 3.0 TDI Prestige	\$41,255 - \$48,557	\$9,455 - \$13,407	\$4,728 - \$6,735
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$43,330 - \$50,644	\$9,505 - \$13,533	\$4,753 - \$6,830
2012	Audi Q7 Utility 4D 3.0 TDI Premium	\$44,230 - \$48,474	\$10,380 - \$13,886	\$5,190 - \$6,996
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$45,130 - \$50,050	\$10,355 - \$14,375	\$5,178 - \$7,305
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$47,530 - \$56,430	\$10,405 - \$15,380	\$5,203 - \$7,748
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$50,255 - \$58,657	\$10,505 - \$15,307	\$5,253 - \$7,735

**VOLKSWAGEN LESSEES
(2009-2012 Touareg)**

Model Year	Model and Trim	Lessee Restitution
2012	VW Touareg Utility 4D TDI Executive	\$6,536 - \$6,957
	VW Touareg Utility 4D TDI Lux	\$6,770 - \$6,770
	VW Touareg Utility 4D TDI Sport	\$6,201 - \$6,344

**AUDI LESSEES
(2009-2012 Q7)**

Model Year	Model and Trim	Lessee Restitution
2012	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$7,045 - \$7,325
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$6,953 - \$6,953
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$7,815 - \$7,815

Amounts reflect the total payments by VW and Bosch. Ranges are before any mileage adjustments. To determine your exact amount and to calculate any mileage adjustment, visit VWCourtSettlement.com.

II. PAYMENTS FOR GENERATION 2 OWNERS/LESSEES (MODEL YEARS 2013-2016)

If a Certified Emissions Repair is timely available

VOLKSWAGEN OWNERS (2013-2016 Touareg)

Model Year	Model and Trim	Certified Emissions Repair
2013	VW Touareg Utility 4D TDI Executive	\$9,204 - \$9,252
	VW Touareg Utility 4D TDI Lux	\$8,822 - \$8,869
	VW Touareg Utility 4D TDI Sport	\$8,539 - \$8,587
	VW Touareg Utility 4D TDI Sport w/ Nav.	\$8,624 - \$8,672
2014	VW Touareg Utility 4D TDI Executive	\$9,897 - \$9,909
	VW Touareg Utility 4D TDI Lux	\$9,272 - \$9,284
	VW Touareg Utility 4D TDI R-Line	\$9,864 - \$9,919
	VW Touareg Utility 4D TDI Sport w/ Nav.	\$9,027 - \$9,082
2015	VW Touareg Utility 4D TDI Executive	\$10,462 - \$10,617
	VW Touareg Utility 4D TDI Lux	\$9,879 - \$10,034
	VW Touareg Utility 4D TDI Sport Technology	\$9,596 - \$9,604
2016	VW Touareg Utility 4D TDI Executive	\$10,935 - \$11,101
	VW Touareg Utility 4D TDI Lux	\$10,180 - \$10,590
	VW Touareg Utility 4D TDI Sport w/ Tech.	\$9,669 - \$10,104

Former Eligible Owners will receive 50% of the Certified Emissions Repair amount.

AUDI OWNERS (2013-2016 Q5, Q7, A6, A7, A8, A8L)

Model Year	Model and Trim	Certified Emissions Repair
2013	Audi Q7 Utility 4D 3.0 TDI Premium	\$8,924 - \$9,187
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$9,342 - \$9,539
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$9,774 - \$10,334
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$9,992 - \$10,612
2014	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$9,514 - \$9,849
	Audi A6 Sedan 4D 3.0 TDI Prestige	\$9,907 - \$10,489
	Audi A7 Sedan 4D 3.0 TDI Premium Plus	\$10,409 - \$10,737
	Audi A7 Sedan 4D 3.0 TDI Prestige	\$10,904 - \$11,479
	Audi A8 Sedan 4D 3.0L TDI LWB	\$11,164 - \$12,034
	Audi Q5 Utility 4D 3.0 TDI Premium Plus	\$9,387 - \$9,697
	Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line	\$9,759 - \$10,007
	Audi Q5 Utility 4D 3.0 TDI Prestige	\$9,964 - \$10,349
	Audi Q5 Utility 4D 3.0 TDI Prestige S-Line	\$10,339 - \$10,614
	Audi Q7 Utility 4D 3.0 TDI Premium	\$9,612 - \$9,842
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$9,822 - \$10,067
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$10,439 - \$10,992
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$10,514 - \$11,094

Amounts reflect the total payments by VW and Bosch. Ranges are before any mileage adjustments. To determine your exact amount and to calculate any mileage adjustment, visit VWCourtSettlement.com.

Model Year	Model and Trim	Certified Emissions Repair
2015	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$10,062 - \$10,384
	Audi A6 Sedan 4D 3.0 TDI Prestige	\$10,412 - \$11,009
	Audi A7 Sedan 4D 3.0 TDI Premium Plus	\$11,032 - \$11,347
	Audi A7 Sedan 4D 3.0 TDI Prestige	\$11,524 - \$12,114
2015	Audi A8 Sedan 4D 3.0L TDI LWB	\$12,084 - \$13,019
	Audi Q5 Utility 4D 3.0 TDI Premium Plus	\$9,587 - \$9,942
	Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line	\$9,778 - \$10,175
	Audi Q5 Utility 4D 3.0 TDI Prestige	\$10,187 - \$10,505
	Audi Q5 Utility 4D 3.0 TDI Prestige S-Line	\$10,463 - \$10,738
	Audi Q7 Utility 4D 3.0 TDI Premium	\$9,839 - \$10,031
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$10,244 - \$10,427
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$10,786 - \$11,361
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$10,947 - \$11,447
2016	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$10,656 - \$11,463
	Audi A6 Sedan 4D 3.0 TDI Prestige	\$11,046 - \$12,385
	Audi A7 Sedan 4D 3.0 TDI Premium Plus	\$11,709 - \$12,395
	Audi A7 Sedan 4D 3.0 TDI Prestige	\$11,902 - \$14,419
	Audi A8 Sedan 4D 3.0L TDI LWB	\$13,024 - \$13,958
	Audi Q5 Utility 4D 3.0 TDI Premium Plus	\$9,637 - \$10,535
	Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line	\$10,228 - \$10,621
	Audi Q5 Utility 4D 3.0 TDI Prestige	\$10,231 - \$11,347
	Audi Q5 Utility 4D 3.0 TDI Prestige S-Line	\$10,231 - \$11,509

Former Eligible Owners will receive 50% of the Certified Emissions Repair amount.

PORSCHE OWNERS (2013-2016 Cayenne)

Model Year	Model and Trim	Certified Emissions Repair
2013	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$9,729 - \$10,129
2014	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$10,514 - \$10,947
	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel Executive	\$11,052 - \$11,319
2015	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$11,133 - \$11,736
2016	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$10,891 - \$17,614

Former Eligible Owners will receive 50% of the Certified Emissions Repair amount.

VOLKSWAGEN/AUDI/PORSCHE LESSEES

Model Year, Model and Trim	Certified Emissions Repair
All Models	\$3,200

Amounts reflect the total payments by VW and Bosch. Ranges are before any mileage adjustments. To determine your exact amount and to calculate any mileage adjustment, visit VWCourtSettlement.com.

III. PAYMENTS FOR GENERATION 2 OWNERS/LESSEES (MODEL YEARS 2013-2016)

If a Certified Emissions Repair is NOT timely available

VOLKSWAGEN OWNERS (2013-2016 Touareg)

Model Year	Model and Trim	Buyback	Approved Emissions Modification
2013	VW Touareg Utility 4D TDI Executive	\$51,303 - \$55,933	\$13,028 - \$17,233
	VW Touareg Utility 4D TDI Lux	\$47,478 - \$51,726	\$12,928 - \$16,751
	VW Touareg Utility 4D TDI Sport	\$44,653 - \$48,281	\$12,853 - \$16,106
	VW Touareg Utility 4D TDI Sport w/ Nav.	\$45,503 - \$49,553	\$12,878 - \$16,503
2014	VW Touareg Utility 4D TDI Executive	\$58,228 - \$63,083	\$14,078 - \$18,883
	VW Touareg Utility 4D TDI Lux	\$51,978 - \$56,208	\$13,928 - \$18,108
	VW Touareg Utility 4D TDI R-Line	\$57,903 - \$63,193	\$14,028 - \$18,893
	VW Touareg Utility 4D TDI Sport w/ Nav.	\$49,528 - \$53,981	\$13,828 - \$17,856
2015	VW Touareg Utility 4D TDI Executive	\$63,884 - \$70,426	\$14,937 - \$20,303
	VW Touareg Utility 4D TDI Lux	\$58,052 - \$64,457	\$14,902 - \$19,982
	VW Touareg Utility 4D TDI Sport Technology	\$55,223 - \$59,723	\$14,567 - \$19,067
2016	VW Touareg Utility 4D TDI Executive	\$68,609 - \$75,186	\$15,338 - \$20,825
	VW Touareg Utility 4D TDI Lux	\$61,948 - \$69,829	\$15,276 - \$20,843
	VW Touareg Utility 4D TDI Sport w/ Tech.	\$57,461 - \$64,552	\$14,788 - \$19,438

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AUDI OWNERS
(2013-2016 Q5, Q7, A6, A7, A8, A8L)

Model Year	Model and Trim	Buyback	Approved Emissions Modification
2013	Audi Q7 Utility 4D 3.0 TDI Premium	\$49,528 - \$54,725	\$14,828 - \$18,736
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$53,928 - \$60,266	\$14,928 - \$20,126
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$58,003 - \$68,430	\$15,003 - \$20,626
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$61,459 - \$71,796	\$15,153 - \$21,130
2014	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$55,403 - \$63,478	\$15,378 - \$20,503
	Audi A6 Sedan 4D 3.0 TDI Prestige	\$59,328 - \$72,465	\$15,478 - \$23,415
	Audi A7 Sedan 4D 3.0 TDI Premium Plus	\$64,353 - \$72,411	\$16,078 - \$22,040
	Audi A7 Sedan 4D 3.0 TDI Prestige	\$69,303 - \$82,897	\$16,178 - \$24,672
	Audi A8 Sedan 4D 3.0L TDI LWB	\$74,131 - \$95,508	\$19,317 - \$32,933
	Audi Q5 Utility 4D 3.0 TDI Premium Plus	\$54,553 - \$61,133	\$14,403 - \$19,128
	Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line	\$59,353 - \$65,996	\$15,978 - \$21,013
	Audi Q5 Utility 4D 3.0 TDI Prestige	\$60,578 - \$68,747	\$14,528 - \$20,848
	Audi Q5 Utility 4D 3.0 TDI Prestige S-Line	\$65,153 - \$73,604	\$16,078 - \$22,354
	Audi Q7 Utility 4D 3.0 TDI Premium	\$57,228 - \$63,066	\$15,203 - \$19,966
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$59,153 - \$66,844	\$15,228 - \$21,344
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$64,653 - \$76,899	\$15,328 - \$23,299
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$66,103 - \$77,126	\$15,403 - \$22,749
	2015	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$60,878 - \$70,117
Audi A6 Sedan 4D 3.0 TDI Prestige		\$64,378 - \$77,978	\$16,078 - \$24,328
Audi A7 Sedan 4D 3.0 TDI Premium Plus		\$70,878 - \$80,528	\$16,503 - \$23,353
Audi A7 Sedan 4D 3.0 TDI Prestige		\$75,503 - \$89,746	\$16,278 - \$25,271
Audi A8 Sedan 4D 3.0L TDI LWB		\$84,950 - \$105,421	\$22,150 - \$35,562
Audi Q5 Utility 4D 3.0 TDI Premium Plus		\$56,334 - \$65,856	\$14,059 - \$20,581
Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line		\$62,056 - \$68,394	\$15,671 - \$21,532
Audi Q5 Utility 4D 3.0 TDI Prestige		\$62,756 - \$73,448	\$14,359 - \$22,776
Audi Q5 Utility 4D 3.0 TDI Prestige S-Line		\$66,722 - \$76,431	\$15,709 - \$23,893
Audi Q7 Utility 4D 3.0 TDI Premium		\$58,650 - \$64,839	\$15,021 - \$19,530
Audi Q7 Utility 4D 3.0 TDI Premium Plus		\$63,378 - \$72,289	\$15,603 - \$23,589
Audi Q7 Utility 4D 3.0 TDI Prestige		\$68,869 - \$80,842	\$15,789 - \$23,337
Audi Q7 Utility 4D 3.0 TDI Prestige S-Line		\$69,733 - \$84,883	\$15,869 - \$26,919
2016	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$69,303 - \$80,291	\$16,805 - \$23,354
	Audi A6 Sedan 4D 3.0 TDI Prestige	\$72,988 - \$88,904	\$16,887 - \$23,825
	Audi A7 Sedan 4D 3.0 TDI Premium Plus	\$79,907 - \$89,759	\$17,235 - \$24,170
	Audi A7 Sedan 4D 3.0 TDI Prestige	\$81,287 - \$112,501	\$16,828 - \$26,606
	Audi A8 Sedan 4D 3.0L TDI LWB	\$93,104 - \$105,159	\$19,788 - \$28,375
	Audi Q5 Utility 4D 3.0 TDI Premium Plus	\$56,860 - \$70,226	\$14,071 - \$19,680
	Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line	\$63,061 - \$70,253	\$14,409 - \$19,344
	Audi Q5 Utility 4D 3.0 TDI Prestige	\$65,779 - \$79,034	\$14,636 - \$20,307
	Audi Q5 Utility 4D 3.0 TDI Prestige S-Line	\$65,651 - \$81,245	\$14,749 - \$20,930

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**PORSCHE OWNERS
(2013-2016 Cayenne)**

Model Year	Model and Trim	Buyback	Approved Emissions Modification
2013	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$60,454 - \$76,642	\$16,179 - \$30,607
2014	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$67,604 - \$93,819	\$16,004 - \$40,569
	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel Executive	\$72,304 - \$88,395	\$16,079 - \$30,995
2015	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$75,651 - \$109,963	\$17,400 - \$47,412
2016	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$74,144 - \$146,272	\$15,621 - \$26,918

**VOLKSWAGEN LESSEES
(2013-2016 Touareg)**

Model Year	Model and Trim	Approved Emissions Modification
2013	VW Touareg Utility 4D TDI Executive	\$8,214 - \$8,749
	VW Touareg Utility 4D TDI Lux	\$7,505 - \$8,538
	VW Touareg Utility 4D TDI Sport	\$6,877 - \$8,336
	VW Touareg Utility 4D TDI Sport w/ Nav.	\$6,889 - \$8,428
2014	VW Touareg Utility 4D TDI Executive	\$7,489 - \$9,892
	VW Touareg Utility 4D TDI Lux	\$7,414 - \$9,504
	VW Touareg Utility 4D TDI R-Line	\$7,464 - \$9,715
	VW Touareg Utility 4D TDI Sport w/ Nav.	\$7,389 - \$9,230
2015	VW Touareg Utility 4D TDI Executive	\$7,919 - \$10,750
	VW Touareg Utility 4D TDI Lux	\$7,901 - \$10,441
	VW Touareg Utility 4D TDI Sport Technology	\$7,734 - \$9,983
2016	VW Touareg Utility 4D TDI Executive	\$8,295 - \$11,074
	VW Touareg Utility 4D TDI Lux	\$8,073 - \$10,839
	VW Touareg Utility 4D TDI Sport w/ Tech.	\$7,982 - \$9,913

**AUDI LESSEES
(2013-2016 Q5, Q7, A6, A7, A8, A8L)**

Model Year	Model and Trim	Approved Emissions Modification
2013	Audi Q7 Utility 4D 3.0 TDI Premium	\$7,985 - \$9,038
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$7,414 - \$9,550
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$8,185 - \$9,907
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$8,980 - \$10,075
2014	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$7,639 - \$9,921
	Audi A6 Sedan 4D 3.0 TDI Prestige	\$7,689 - \$10,479
	Audi A7 Sedan 4D 3.0 TDI Premium Plus	\$8,786 - \$10,713
	Audi A7 Sedan 4D 3.0 TDI Prestige	\$8,039 - \$11,058
	Audi A8 Sedan 4D 3.0L TDI LWB	\$8,502 - \$11,836

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Model Year	Model and Trim	Approved Emissions Modification
2014	Audi Q5 Utility 4D 3.0 TDI Premium Plus	\$7,177 - \$9,468
	Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line	\$7,983 - \$9,511
	Audi Q5 Utility 4D 3.0 TDI Prestige	\$7,214 - \$9,682
	Audi Q5 Utility 4D 3.0 TDI Prestige S-Line	\$7,706 - \$9,647
	Audi Q7 Utility 4D 3.0 TDI Premium	\$8,947 - \$9,578
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$7,564 - \$10,033
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$7,714 - \$10,333
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$7,652 - \$10,539
2015	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$7,989 - \$10,492
	Audi A6 Sedan 4D 3.0 TDI Prestige	\$8,027 - \$11,018
	Audi A7 Sedan 4D 3.0 TDI Premium Plus	\$9,959 - \$10,877
	Audi A7 Sedan 4D 3.0 TDI Prestige	\$8,127 - \$11,303
	Audi A8 Sedan 4D 3.0L TDI LWB	\$9,102 - \$13,135
	Audi Q5 Utility 4D 3.0 TDI Premium Plus	\$7,005 - \$9,577
	Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line	\$7,180 - \$9,538
	Audi Q5 Utility 4D 3.0 TDI Prestige	\$7,130 - \$9,560
	Audi Q5 Utility 4D 3.0 TDI Prestige S-Line	\$7,174 - \$9,859
	Audi Q7 Utility 4D 3.0 TDI Premium	\$8,273 - \$9,753
	Audi Q7 Utility 4D 3.0 TDI Premium Plus	\$7,777 - \$10,447
	Audi Q7 Utility 4D 3.0 TDI Prestige	\$7,845 - \$10,757
	Audi Q7 Utility 4D 3.0 TDI Prestige S-Line	\$7,910 - \$11,022
2016	Audi A6 Sedan 4D 3.0 TDI Premium Plus	\$8,449 - \$11,414
	Audi A6 Sedan 4D 3.0 TDI Prestige	\$8,304 - \$11,764
	Audi A7 Sedan 4D 3.0 TDI Premium Plus	\$8,404 - \$11,651
	Audi A7 Sedan 4D 3.0 TDI Prestige	\$9,381 - \$12,373
	Audi A8 Sedan 4D 3.0L TDI LWB	\$12,343 - \$13,692
	Audi Q5 Utility 4D 3.0 TDI Premium Plus	\$7,130 - \$9,582
	Audi Q5 Utility 4D 3.0 TDI Premium Plus S-Line	\$7,155 - \$9,571
	Audi Q5 Utility 4D 3.0 TDI Prestige	\$8,856 - \$9,833
	Audi Q5 Utility 4D 3.0 TDI Prestige S-Line	\$8,239 - \$8,239

**PORSCHE LESSEES
(2013-2016 Cayenne)**

Model Year	Model and Trim	Approved Emissions Modification
2013	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$7,102 - \$9,605
2014	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$7,389 - \$9,960
	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel Executive	\$8,429 - \$10,267
2015	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$7,021 - \$10,151
2016	Porsche Cayenne Utility 4D AWD 3.0L V6 T-Diesel	\$7,427 - \$11,476

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