Tesla Autopilot: Benavides judgment and NHTSA investigations

IMPLEMENTED 2019–2026 · MANUFACTURING AND INDUSTRIAL · US · BAND F · PARTLY PROVED
VERSION 1.2 · PUBLISHED 15 NOVEMBER 2026 · UPDATED 25 NOVEMBER 2026 · FACTS CHECKED 15 NOVEMBER 2026

A federal jury found Tesla's Autopilot defective and one-third responsible for a fatal 2019 crash. Tesla recalled about 2 million vehicles after a regulator's investigation. The judgment is under appeal.

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NOTICE WORDING LAST UPDATED 16 NOVEMBER 2026

AT A GLANCE

What went wrong: Weak oversight or controls; AI output or malfunction.

AI and automation used: Driver-assistance software (Autopilot and Full Self-Driving), SAE Level 2 partial automation.

Implemented: 2019–2026. Grade: band F, Failure, Partly proved.

Headline result, as reported: Federal judgment of $242.57 million against Tesla in the Benavides case, now on appeal; Tesla recalled 2,031,220 vehicles after NHTSA's Autopilot investigation

1 · The case

The facts, as reported by the 5 sources listed at the end. Where a source is silent, the field says "Not reported".

Organisation

Tesla. US electric vehicle maker. Autopilot is a driver-assistance feature set that Tesla and NHTSA describe as SAE Level 2 partial automation, which requires a supervising driver. This synopsis covers a court case and regulator actions, not Tesla's wider business. Canvas block: 8. Governance and risk. Also 2. Products and services, 6. Data and technology.

Business challenge

The challenge. Not reported by Tesla in the sources opened. NHTSA's concern in EA22002 was that Autopilot's driver controls might be insufficient to prevent crashes caused by lack of driver engagement.

How it was addressed. Autopilot is Traffic-Aware Cruise Control plus Autosteer, which keeps the vehicle in its lane (NHTSA). In the Benavides case, the plaintiffs claimed strict product liability for defective design and failure to warn, and negligent misrepresentation and defective manufacture; the court dismissed the last two before trial. Plaintiffs argued that Autopilot had defective designs that partly caused the crash and that Tesla was grossly negligent in developing it and responding to earlier failures. Tesla argued that the vehicle was not proved defective, that it had no duty to warn and gave extensive warnings, and that Florida law prohibits or caps the punitive award. In the regulator track, Tesla filed recall 23V-838 in December 2023 with an over-the-air software remedy, while not concurring with NHTSA's analysis. [1] [2] [3] [4] [5]

Who implemented it

In-house (In-house): Tesla: Developed and deployed Autopilot and Full Self-Driving in its own vehicles..

Technology (SEAM pillar E)

SEAM types: T9 AI in physical systems. Deployment: Not reported. Vendors and products: Tesla, Autopilot (Autosteer and Traffic-Aware Cruise Control), Full Self-Driving (Supervised).

Where it was built in: Vehicle software in Tesla cars that provides steering, braking and acceleration support, updated over the air.

What changed

Before: Autopilot's controls were as NHTSA found them in EA22002. After: Tesla deployed a recall remedy adding controls and alerts, including suspension from Autosteer use if the driver repeatedly fails to demonstrate sustained driving responsibility. NHTSA then opened a recall query on whether the remedy was adequate. In court, the jury found Tesla liable on both counts and for punitive damages. [1] [2] [3] [4] [5]

Cost of failure

Final judgment of $242,570,000 against Tesla (3 August 2025): $19,470,000 compensatory to the estate of Naibel Benavides Leon, $23,100,000 compensatory to Dillon Angulo, and $200,000,000 punitive. The jury's compensatory awards were $59 million and $70 million before reduction to Tesla's 33% share. Cost of the recall remedy: Not reported.

What it saved

Not reported [1] [2] [3] [4] [5]

Governance and control

NHTSA found weak driver engagement controls for Autopilot's permissive operating capabilities, and Tesla did not concur with that analysis. A court found the trial evidence more than supported the verdict. An accountable owner at Tesla and internal assurance: Not reported.

S2 · Accountable owner · Not reported
Not reported.

A1 · Safe use · Missing (independent source shows it was absent)
NHTSA found Autopilot's controls and warnings were insufficient to prevent foreseeable misuse in certain circumstances, and Tesla said the controls may not be sufficient to prevent driver misuse; Tesla did not concur with NHTSA's analysis. [2] [3]

A2 · Human in the loop · Evidenced
Tesla describes Autopilot as Level 2, with the driver responsible and required to supervise; NHTSA found the driver engagement system weak for the system's capabilities. [2] [3]

A3 · Monitoring and assurance · Evidenced
NHTSA's crash analysis, the recall query RQ24009 on the remedy, and PE25012 show regulator monitoring of performance; Tesla's recall filing cites 9 warranty claims. [2] [3] [4]

A4 · Vendor AI · Not reported
Not reported.

A5 · Agent controls · Not reported
Not reported.

A6 · Standards and regulation · Outside scrutiny (a regulator, court, auditor or similar body acted)
Tesla filed a safety recall under federal rules, and NHTSA investigations and a federal court applied product liability law to the system. [1] [2] [3]

What worked, what did not, what is unproven

WORKED

– Not reported

DID NOT

– The jury found Tesla liable on defective design and failure to warn, and liable for punitive damages. Tesla disputes the verdict.

– NHTSA found in EA22002 that a mismatch of weak usage controls and high control authority created a critical safety gap, and identified at least 13 crashes involving one or more fatalities in which foreseeable misuse played an apparent role.

– NHTSA opened recall query RQ24009 after identifying concerns from post-remedy crash events and preliminary tests of remedied vehicles, and noted that part of the remedy requires owner opt-in and can be reversed by the driver.

– NHTSA opened PE25012 in October 2025 on reports of Full Self-Driving proceeding through red signals and entering opposing lanes; these are allegations in complaints and reports at a preliminary stage.

UNPROVEN

– The outcome of Tesla's appeal in the Eleventh Circuit (No. 26-10858): pending in the sources opened.

– Whether the recall remedy was adequate: current status of RQ24009 could not be confirmed from an official NHTSA source.

– The findings of PE25012: the sources opened show only its opening in October 2025.

– How much of the crash outcome is attributable to Autopilot rather than the driver beyond the jury's 33% share, which Tesla disputes.

Timeline

Apr 2019 A 2019 Tesla Model S on which Autopilot features were available hits a parked Chevrolet

Aug 2021 NHTSA opens preliminary evaluation PE21-020 into Tesla vehicles with Autosteer engaged striking stationary first-responder vehicles [3]

Jun 2022 NHTSA upgrades the investigation to Engineering Analysis EA22002 [2]

Dec 2023 Tesla files recall 23V-838 covering 2,031,220 vehicles, with an over-the-air software remedy, while not concurring with NHTSA's analysis [3]

Apr 2024 NHTSA closes EA22002 and opens recall query RQ24009 to assess the remedy [2]

Jun 2025 The court allows the defective design and failure-to-warn claims and the punitive damages demand to go to trial [1]

Aug 2025 Final judgment of $242.57 million entered after the jury finds Tesla 33% responsible [1]

Oct 2025 NHTSA opens preliminary evaluation PE25012 into traffic law violations with Full Self-Driving engaged [4]

Feb 2026 The court denies Tesla's motion for judgment as a matter of law or a new trial [1]

Jul 2026 The US Chamber of Commerce files an amicus brief in the Eleventh Circuit appeal (No. 26-10858), listed as pending [5]

2 · Grade and SEAM assessment

MarLuc's opinion, made on the evidence above. How cases are graded: marluc.co.uk/case-studies/how-we-rate

Level of change and impact

Claimed: Not applicable. Grade: F, Failure. Proof: Partly proved. Level of change: Not graded.

No level assessed: band F, a judgment against the company for harm involving its driver-assistance system, plus a regulator's findings and a recall. The judgment is under appeal.

Graded F. A court entered judgment against Tesla for harm involving its driver-assistance system, and a regulator found that Autopilot's controls were insufficient to prevent misuse, which led to a recall. Tesla disputes both and the judgment is under appeal, so the marker is Partly proved.

The SEAM view and lessons learnt

The record shows what happens when a supervised AI feature is allowed to operate more widely than its controls can safely supervise. NHTSA's finding was a mismatch between how much the system could do and how well it checked that the driver was engaged. For any organisation deploying AI that needs human supervision, the supervising control needs the same design attention as the capability, and its effectiveness needs measuring after release.

1. Match the strength of supervision controls to what the system can do.
2. Measure whether a fix works after release, as regulators will.
3. Treat public claims about capability as evidence in any later dispute.

Evidence

Score 3 of 4. Independent: a federal court judgment and order, and regulator documents. The judgment is under appeal and Tesla did not concur with NHTSA's analysis.

Evaluation method. Court and regulator findings: Benavides v. Tesla (S.D. Fla., final judgment 3 August 2025, post-trial order 19 February 2026) and NHTSA documents EA22002, recall 23V-838, RQ24009 (as referenced) and PE25012.

Sources disagree. Not reported in the sources opened. Tesla did not concur with NHTSA's analysis in its recall filing, and disputes the verdict on appeal.

Status. Ongoing: appeal pending in the Eleventh Circuit (No. 26-10858); NHTSA preliminary evaluation PE25012 opened October 2025.

3 · Original sources

Read these in full. To challenge a fact or a grade, use the contact form at marluc.co.uk or the link on https://marluc.co.uk/case-studies/tesla-autopilot-benavides-nhtsa

[1] US District Court, Southern District of Florida: Benavides v. Tesla, Inc., Order on Amended Renewed Motion for Judgment as a Matter of Law or, Alternatively, Motion for New Trial (ECF 612, 19 February 2026)
https://www.govinfo.gov/content/pkg/USCOURTS-flsd-1_21-cv-21940/pdf/USCOURTS-flsd-1_21-cv-21940-14.pdf

[2] NHTSA Office of Defects Investigation: EA22002 closing resume, Autopilot System Driver Controls (25 April 2024)
https://static.nhtsa.gov/odi/inv/2022/INCLA-EA22002-14498.pdf

[3] NHTSA: Part 573 Safety Recall Report 23V-838, Tesla, Inc. (12 December 2023)
https://static.nhtsa.gov/odi/rcl/2023/RCLRPT-23V838-8276.PDF

[4] NHTSA Office of Defects Investigation: PE25012 opening resume, traffic safety violations while Full Self-Driving is engaged (7 October 2025)
https://static.nhtsa.gov/odi/inv/2025/INOA-PE25012-19171.pdf

[5] US Chamber of Commerce: Benavides v. Tesla Inc. (case page, Eleventh Circuit No. 26-10858)
https://www.uschamber.com/cases/tort-and-products-liability/benavides-v-tesla-inc

Tesla website: https://www.tesla.com

Version 1.2 · Published 15 November 2026 · Updated 25 November 2026 · Facts checked against sources 15 November 2026 · Downloaded 26 November 2026. This PDF may be out of date: the latest version, and a way to report an error or a better source, is at https://marluc.co.uk/case-studies/tesla-autopilot-benavides-nhtsa

VERSION HISTORY

v1.2 25 November 2026 Method update: technology type updated to T9 (AI in physical systems) and controls re-checked against sources; no fixed operating limit is reported, so controls are below the T9 minimum.
v1.1 15 November 2026 Method update: standards and regulation (A6) relabelled "outside scrutiny" because the evidence is a regulator, court, auditor or similar body acting, not the organisation's own compliance.
v1.0 15 November 2026 First published