

November 2, 2022

Via Certified Mail with Delivery Confirmation

Toyota North America
6565 Headquarters Drive
Plano, TX 75024
ATTN: Mr. Chris Nielsen

RE: Demand for Payment- Case [REDACTED]

Dear Mr. Nielsen,

Please be advised, Toyota North America failed to notify me of the latent defect in the Headlight Operating System. I have had ongoing issues with the flickering of the lights for multiple years. I finally saved up enough money to try and fix the problem and spent \$2854.34 (copies of receipts attached dating back to 2018). After multiple failed attempts to get the problem fixed and having both headlights shut off simultaneously, I went to Alexandria Toyota in Virginia on October 20, 2022 to get the problem diagnosed. The Automobile Status Report showed that the failed headlights were a direct result of the latent defect in the Headlight Operating System that was repaired free of charge in two separate Support Programs: one that ended in 2012, and the other in 2013. When I contacted Customer Support Service on October 24, 2022, to inquire when Toyota contacted me and where they sent the Support Program Information regarding the headlight issue, none of the three managers; Julie, Kendra, or Sheryl (they would not provide me with their last names) could tell me the date this was sent out, nor the address. I didn't own the car in 2012, and never received the 2017 notice. If I had received this information, I would have brought my vehicle in at that time.

As a public-school teacher, I purchased this vehicle back in 2013 as a "Toyota Certified Vehicle" with the understanding that the 160-point quality assurance meant that this was a safe and reliable vehicle, and that any problems or latent defects were fixed. Toyota misrepresented themselves and are in contradiction with their own policy that states: "The TCUV policy prohibits the certification of any vehicle with an outstanding Safety Recall, Special Service Campaign, or Limited Service Campaign. Thus, no affected units are to be designated, sold, or delivered as a TCUV until all applicable Safety Recalls, Special Service Campaigns, and Limited Service Campaigns have been completed on that vehicle." As a High School Math teacher, I always stay after school to tutor my ESL and Special need students, as they have lost so much learning time from the pandemic, but now must leave work after classes end because I don't have working headlights and am unable to drive in the dark. Not only is this impacting my own safety, but the ultimate success of my students.

This will be Toyota North America's only chance to settle this matter before I file suit against Toyota North America in Small Claims Court. I am agreeable to waive the total amount if Toyota agrees to fix and finally resolve the safety issues of the lights at no charge at one of their local dealerships on or before November 23, 2022. Please contact me on or before November 23, 2022, for purposes of settling this matter. If I do not hear from Toyota North America on or before November 23, 2022, without additional notice I will file a lawsuit against Toyota North America. It is



in Toyota America's best interest to settle this matter before a lawsuit is filed. If a judgement is obtained against Toyota North America, it will negatively affect Toyota North America's reputation. Toyota North America will be ordered to pay court costs, and Toyota North America will incur interest at a rate of 12% per annum.

If Toyota North America decides to ignore this demand for payment, I will pursue all my legal remedies without further notice to Toyota North America. This letter serves as evidence that I have attempted to resolve this matter informally.

Sincerely,

NE WDC

CC: Alexandria Toyota Dealership
Attn: Joe Parsons (Service Director)
and Laura Smith (BDC Manager/Customer Relations)
3750 Richmond Highway VA 22305

CC: NHTSA
1200 New Jersey Ave.
SE West Building
Washington, DC 20590

Multi-Point Inspection Form

RO#

VIN JTDKKB20U87

Advisor Jenny Kirby

Technician Armando Marquez

Created On 10/20/2022

☒ Checked and OK at this time ☐ May Require Future Attention ☒ Requires immediate attention

Exterior

- ☒ Horn operation
- ☒ Head lights / tail lights / turn signals / brake lights / hazard warning lights / exterior lamps (check for damage and operation)
- ☒ Windshield wiper and washer operation
- ☒ Windshield glass
- ☒ Fuel tank cap gasket

Interior

- ☒ Dome light / amp light / dimmer combination meter
- ☒ Cabin air filter
- ☒ Parking brake operation

Under Hood

- ☐ Air filter
- ☒ Battery condition (cables / clamps / corrosion)
- ☒ Battery state of health
- ☒ Cooling system (leaks)
- ☒ Hoses (cracks / damage / leaks)
- ☒ Drive belts (cracks / damage / wear)
- ☒ Radiator core / air condition condenser (if equipped)

Fluids

- ☒ Windshield Washer
- ☒ Coolant
- ☒ Power steering (if equipped)
- ☒ Brake reservoir
- ☒ Clutch reservoir (if equipped)
- ☒ Transmission / transaxle
- ☒ Differential (if equipped)
- ☒ Transfer case (4WD models)

Tires - Rims / Wheels / Lug Nuts

- ☒ LF
- ☒ RF
- ☒ LR
- ☒ RR

Under Vehicle

- ☒ Propeller / driveshaft (damage / leaks / U-joints)
- ☒ Drive / CV shaft (damage / leaks / boots)
- ☒ Axle hub & bearing (damage / leaks / noise)
- ☒ Steering linkage (damage / leaks / worn components)
- ☒ Suspension (damage / leaks / worn components)
- ☒ Fluid leaks (engine / transmission / differential)
- ☒ Exhaust system (damage / leaks / corrosion)
- ☒ Alignment

Tire Tread Depth [measured in 1/32"]



- ☒ LF 11, 11, 11
- ☒ RF 11, 11, 11
- ☒ LR 11, 11, 11
- ☒ RR 11, 11, 11

Tires - Damage / Abnormal Wear

- ☒ LF
- ☒ RF
- ☒ LR
- ☒ RR
- ☒ Spare

Check Brake Linings [measured in mm]

- ☒ LF 6, 6, 6
- ☒ RF 6, 6, 6
- ☒ LR 3, Drum
- ☒ RR 3, Drum
- ☒ Brake Lines / hoses / parking brake cable
- ☒ Disc / Drums / Calipers / Wheel Cylinders

Repair Estimate

Service Advisor
Jenny Kirby (2160)
jkirby@alexandriatoyota.com

PREPARED FOR

Date 10/20/2022 06:44 PM
2007 Toyota PRIUS
VIN JTDKB20U87
Mileage 159,561
RO#

Service Name	Price
[Other]: LEFT SIDE HEADLIGHT INOPERATIVE - IT HAS AFTERMARKET LIGHT BULB - HEADLAMP BACK COVER NOT INSTALLED PROPERLY - RIGHT SIDE HEADLIGHT FLICKERS - HEADLIGHT BACK COVER NOT INSTALLED PROPERLY - RIGHT SIDE HEADLIGHT HAS AFTERMARKET HEADLIGHT CONTROL COMPUTER - PRICE ON BOTH SIDE HID HEADLIGHT BULBS - PRICE ON BOTH HEADLAMP BACK COVERS - PRICE ON RIGHT SIDE HEADLIGHT CONTROL COMPUTER NOTE: WILL CHECK OPERATION OF LEFT SIDE WHEN NEW LIGHT BULB IS INSTALL	\$1397.66
[Other]: LEFT FOG LIGHT LENS IS CRACKED - PRICE ON FOG LIGHT ASSEMBLY AND PRICE ON LIGHT BULB	\$393.61
Drive Belt: DRIVE BELT HAS EXCESSIVE CRACKS - PRICE ON DRIVE BELT	\$188.26
[Other]: FRONT SWAY BAR DUST BOOTS ARE TORN - RECOMMEND REPLACE - PRICE ON FRONT SWAY BAR LINKS AND NUTS	\$619.52
Headlight Restoration: HEADLIGHT LENSES ARE CLOUDY - RECOMMEND HEADLIGHT RESTORATION TO IMPROVE APPEAREANSE	\$255.95
Engine Air Filter Replacement	\$54.21
Cabin Air Filter Replacement	\$60.73
Oil Change: NO OIL SHOWN IN DIPSTICK - NO EXTERNAL LEAKS - SUSPECT OIL CONSUMPTION - RECOMMEND MONITOR OIL LEVEL	\$55.95
Alignment: FAILED LANE TEST	\$99.95
Printed on October 20, 2022	
Quote expires on November 19, 2022	

Subtotal \$3125.84
Shop Charges \$39.09
Tax \$86.89
Total \$3251.82

 **Alexandria Toyota**
3750 Richmond Highway
Alexandria, VA 22305

703-684-0700

CUSTOMER #:

INVOICE



Jack Taylor's
**ALEXANDRIA
TOYOTA**

3750 RICHMOND HWY.
ALEXANDRIA, VIRGINIA 22305
PHONE (703) 684-0700
www.alexandriatoyota.com

DUPLICATE 1
PAGE 1

WASHINGTON, DC

HOME:

BUS:

SERVICE ADVISOR: 2160 JENNY KIRBY

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG	
RED	07	TOYOTA PRIUS	JTDKB20U87		159561/159562		
DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
16MAR07 DD			15:00 20OCT22		0.00	CASH	20OCT22
R.O. OPENED		READY	OPTIONS: DLR: ENG:1.5_Liter_DOHC_Hybrid				
07:54 20OCT22		18:44 20OCT22					

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
------	--------	------	------	-------	------	-----	-------

A CUSTOMER STATES LEFT HEADLIGHT IS OUT AND RIGHT SIDE COMES ON AND OFF, IN 2020 ANOTHER SHOP REPLACED RIGHT SIDE BULB AND BALAST, THEN THEY SWITCHED THE LEFT AND RIGHT -THIRD VISIT WITH THEM, LAST WEEK RIGHT STARTED FLICKERING AND LEFT IS OUT, IT LOOKS LIKE HEADLIGHTS ARE SHATTERED INSIDE FROM THE BASE, HAD A CSP/WARRANTY EXTENSION -EXPIRED-CHECK AND ADVISE-GIVE ESTIMATE R DIAGNOSTIC-ADVISED NEEDS BOTH BACK OF HEADLIGHT COVERS, BOTH BULBS AND TO REPLACE AFTERMARKET COMPUTER-DECLINED

401 CTEM					161.95	161.95
PARTS:	0.00	LABOR:	161.95	OTHER:	0.00	TOTAL LINE A:
						161.95

B JTAT RENTAL

RENTAL JTAT RENTAL

401CRENT

0.00 0.00

SUBL JTAT RENTAL

PO

CRENT

45.00 45.00

PARTS:	0.00	LABOR:	0.00	OTHER:	45.00	TOTAL LINE B:
						45.00

C MULTI-POINT INSPECTION CHECK DRIVERS FLOOR MAT INSTALLATION
MPI MULTI-POINT INSPECTION CHECK DRIVERS FLOOR
MAT INSTALLATION

401 CTEM					0.00	0.00
PARTS:	0.00	LABOR:	0.00	OTHER:	0.00	TOTAL LINE C:
						0.00

D CHECK OVER VEHICLE FOR MAINTENANCE NEEDS

R ADVISED -DECLINED

401 CTEM

0.00 0.00

PARTS:	0.00	LABOR:	0.00	OTHER:	0.00	TOTAL LINE D:
						0.00

CUSTOMER PAY SHOP SUPPLIES FOR REPAIR ORDER

BY:

16.20

Limited express warranty, parts and labor 12 months or 12,000 miles whichever occurs first. Alexandria Toyota hereby limits implied warranties to the same period. By signing this receipt I hereby accept my vehicle under these terms and conditions.

Customer Signature

STATEMENT OF DISCLAIMER

The factory warranty constitutes all of the warranties with respect to the sale of this item/items. The Seller hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item/items.

CUSTOMER SIGNATURE

DESCRIPTION

TOTALS

LABOR AMOUNT	161.95
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	45.00
MISC. CHARGES	16.20
TOTAL CHARGES	223.15
LESS INSURANCE	0.00
SALES TAX	4.50
PLEASE PAY THIS AMOUNT	227.65

CUSTOMER COPY



Auto Stop Falls Church

5635 Leesburg Pike

Falls Church, VA 22041

Phone: 703-347-7821

Email: fallschurch@tomsautostop.com

Website: www.tomsautostop.com

Invoice

Bill To

[REDACTED]
Washington, DC [REDACTED]

Plate

[REDACTED]

Description 2007 Toyota Prius Base L4 1.5L 1497CC

VIN JTDKB20U87 [REDACTED]

Odometer 144,089

Mobile

Email

[REDACTED]

Invoice #

[REDACTED]

Invoice Date 1/18/2021 5:27 PM

Work Order #

[REDACTED]

Service Advisor Andres Heureaux

Technician Patrick Knight

Concern

Electrical System Concern

Concern? = We recently replaced bulb on passenger side with her supplied bulb. Now it comes on for a second then cuts of

Service

Headlight(s)

Remove and Replace components as required to access and install materials, and/or perform needed service. Retest and verify repair as required. Perform final road test where applicable.

Remove & Replace Headlamp Ballast & Bulb - Right

Headlight Ballast

1 Unit

\$463.25 / Unit

\$308.94 *

\$463.25 *S

Bulb - Headlight-High Beam and Low Beam 45v 35W Pack
of 1

1 Unit

\$154.00 / Unit

\$154.00 *S

Sub **\$926.19**

Total Parts

\$617.25

Total Labor

\$308.94

Total Before Taxes & Miscellaneous Charges

\$926.19

(*) Job Supplies

\$59.97 S

(E) Environmental Disposal Fee

\$3.95 Each

\$3.95

(S) VA State Sales Tax

6 %

\$40.63

Grand Total

\$1,030.74

Thank you for your business!

I acknowledge receipt of the vehicle and the indebtedness indicated herein.

[REDACTED] paid \$1,030.74 by American Express

Customer Signature: _____

Authorization(s)

1/18/2021 2:52 PM

\$1,030.74

Phone - Mobile

Headlight(s)

Authorized by

[REDACTED]
[REDACTED]
[REDACTED]



Auto Stop Falls Church

5635 Leesburg Pike

Falls Church, VA 22041

Phone: 703-347-7821

Email: fallschurch@tomsautostop.com

Website: www.tomsautostop.com

Invoice

Bill To

[REDACTED]
Washington, DC [REDACTED]

Plate

[REDACTED]

Description 2007 Toyota Prius Base L4 1.5L 1497CC

VIN JTDKB20U87 [REDACTED]

Odometer 148,780

Mobile

Email

[REDACTED]

Invoice #

[REDACTED]

Work Order #

[REDACTED]

Service Advisor Shawn T

Technician John Alligood

Invoice Date 7/16/2021 5:03 PM

Inspection

DIGITAL COURTESY INSPECTION

Check headlight is out again intermittently

\$0.00 *

Right Front

Replaced headlight Ballast under warranty WP

WE SWITCHED NEW BULB TO LEFT FRONT IN CASE

ISSUE PERSISTS

Older bulb from left front is now in right front

Sub \$0.00

Service

Lube, Oil & Filter Service - Synthetic Oil

Drain and refill engine oil, change engine oil filter and lubricate chassis grease fittings and friction points as required. Check and top off fluid levels, additional charges may apply where fluids are required. Complete a complimentary visual vehicle inspection.

Perform Service

\$15.40 *

Engine Oil Filter

1 Unit

\$8.99 / Unit

\$8.99 *S

OIL 5W30 HAV SYNTHETIC

3.9 Unit

\$8.65 / Unit

\$33.74 *S

Sub \$58.13

Total Parts

\$42.73

Total Labor

\$15.40

Total Before Taxes & Miscellaneous Charges

\$58.13

(*) Job Supplies

\$5.81 S

(E) Environmental Disposal Fee

\$3.95 Each

\$3.95

(S) VA State Sales Tax

6 %

\$2.91

Grand Total

\$70.80

Thank you for your business!

I acknowledge receipt of the vehicle and the indebtedness indicated herein.

[REDACTED] paid \$70.80 by Visa, MC, Debit

Customer Signature: _____

amazon.com

Final Details for Order

[Print this page for your records.](#)

Order Placed: December 2, 2020

Amazon.com order number:

Order Total: \$94.34

Shipped on December 3, 2020

Items Ordered

1 of: TOYOTA Genuine 90981-20029 HID Igniter

Sold by: MikeB23 ([seller profile](#))

Condition: New

oem toyota lexus light bulb oem hid

Price

\$89.00

Shipping Address:

Washington, District of Columbia
United States

Shipping Speed:

Standard Shipping

Payment information

Payment Method:

Visa ending in

Billing address

NE, DC
United States

Item(s) Subtotal: \$89.00

Shipping & Handling: \$0.00

Total before tax: \$89.00

Estimated tax to be collected: \$5.34

Grand Total: \$94.34

Credit Card transactions

Visa ending in December 3, 2020: \$94.34

To view the status of your order, return to [Order Summary](#).

Final Details for Order # [REDACTED]

[Print this page for your records.](#)

Order Placed: August 1, 2018

Amazon.com order number: [REDACTED]

Order Total: \$103.95

Shipped on August 2, 2018

Items Ordered

1 of: *Genuine Toyota 90981-20029 HID Igniter*Sold by: MikeB23 ([seller profile](#))

Condition: New

oem toyota lexus light bulb oem hid

Price

\$94.00

Shipping to [REDACTED]

Attn: For [REDACTED]

FALLS CHURCH, VA
United States

Shipping Speed:

Expedited Shipping

Payment information

Payment Method:

American Express ending in [REDACTED]

Billing address

Attn: [REDACTED]

ARLINGTON, VA
United States

Item(s) Subtotal: \$94.00

Shipping & Handling: \$9.95

Total before tax: \$103.95

Estimated tax to be collected: \$0.00

Grand Total: \$103.95

Credit Card transactions

AmericanExpress ending in [REDACTED] August 2, 2018: \$103.95

To view the status of your order, return to [Order Summary](#).