

INFORMATION REDACTED
PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C.
552(B)(6)

February 24, 2026

Via NHTSA Online Complaint Portal (nhtsa.gov/report-a-safety-problem) and Certified Mail

National Highway Traffic Safety Administration

Office of Defects Investigation
1200 New Jersey Avenue SE
Washington, DC 20590

**Re: Vehicle Safety Defect Report — Unauthorized Remote Vehicle Immobilization Devices
— VIN [REDACTED]**

Manufacturer/Installer: Veros Credit, LLC (lender) / PassTime GPS (device manufacturer)

Dear Office of Defects Investigation:

I am reporting a vehicle safety defect involving the unauthorized installation of six (6) remote vehicle immobilization devices (PassTime TRAX-6V, FCC ID: VZO-MTAKAN) in a 2014 Lexus IS350F, VIN [REDACTED]. These devices have the capability to remotely disable the vehicle's ignition system while the vehicle is in operation, creating a serious and immediate safety hazard to the driver, passengers, and the public.

SAFETY HAZARD DESCRIPTION

1. Remote Starter-Interrupt Capability: The PassTime TRAX-6V device is designed to allow the lender to remotely prevent the vehicle's engine from starting. However, these devices also have the technical capability to disable vehicle systems while the vehicle is in motion or idling in traffic. A remote disable command sent while the vehicle is operating on a highway, in an intersection, or in heavy traffic could cause the vehicle to lose power steering, power brakes, and engine power, resulting in loss of vehicle control and a serious or fatal collision.

2. Six Devices Installed — One Disclosed: The Retail Installment Sales Contract discloses and charges for one (1) device. Six (6) were physically installed at three locations: engine bay (2 units), trunk area (2 units), and steering column area (2 units). The redundancy of six immobilization devices exponentially increases the risk of unintended activation, signal interference, or cascading system failure. Multiple devices attempting to control the same vehicle systems simultaneously create unpredictable electrical behavior.

3. No Consumer Notification or Override: The vehicle owner was not informed of the presence of five of the six devices, was not provided with any safety warnings regarding remote immobilization capability, and was not given any means to override or disable the

immobilization function in an emergency. This is functionally equivalent to installing a hidden kill switch that can be remotely activated without the driver's knowledge or consent.

4. Systematic Practice: Veros Credit, LLC maintains a dedicated device purchasing portal with PassTime GPS (portal.passtimegps.com/veroscredit), indicating this practice extends to a large number of vehicles on public roads. The total number of vehicles affected is unknown but potentially in the thousands, as Veros services approximately \$274 million in auto loans based on its pending VART 2026-1 securitization.

FEDERAL MOTOR VEHICLE SAFETY STANDARDS

The installation of undisclosed remote immobilization devices may violate multiple Federal Motor Vehicle Safety Standards (FMVSS), including:

- FMVSS 114 (Theft Protection and Rollaway Prevention) — aftermarket modifications that create remote disable capability beyond the scope of the original anti-theft system;
- FMVSS 135 (Light Vehicle Brake Systems) — remote engine disablement affects power brake assist functionality;
- 49 U.S.C. §30122 (Tampering with Motor Vehicles) — installation of devices that affect the safe operation of a motor vehicle constitutes unlawful tampering.

The National Traffic and Motor Vehicle Safety Act (49 U.S.C. §30101 et seq.) grants NHTSA authority to investigate and order corrective action for vehicle safety defects, including those caused by aftermarket devices.

REQUESTED ACTIONS

I respectfully request that NHTSA:

- Open an investigation into the safety implications of remote vehicle immobilization devices installed by or at the direction of subprime auto lenders, specifically Veros Credit, LLC and PassTime GPS;
- Determine the total number of vehicles affected through Veros's PassTime portal;
- Evaluate whether these devices create an unreasonable risk to motor vehicle safety under 49 U.S.C. §30102;
- Coordinate with the FCC regarding unauthorized electronic device installation (FCC ID: [REDACTED]);
- Consider issuing guidance or rulemaking on remote immobilization device disclosure and safety requirements.

Photographic evidence of the devices, the RISC, and a sworn Notarized Affidavit are available upon request.

Respectfully submitted,



Confidential



Katy, TX

HOUSTON TX RPDC 773

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