

[REDACTED]
Tower Hill, IL [REDACTED]
[REDACTED]

July 15, 2026

Administrator
National Highway Traffic Safety Administration
Office of Defects Investigation (ODI)
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Safety Defect Complaint — American Expedition Vehicles (AEV) as Final-Stage Manufacturer/Alterer

Vehicle: 2024 RAM 3500 AEV Prospector XL Limited | VIN: [REDACTED]

Regulatory Authority: 49 CFR §567.7

To the Administrator:

I am writing to formally notify NHTSA's Office of Defects Investigation of safety-critical defects on a 2024 RAM 3500 AEV Prospector XL Limited (VIN: [REDACTED]) that are directly attributable to the alteration performed by American Expedition Vehicles (AEV), Wixom, Michigan, acting as a final-stage manufacturer under 49 CFR §567.7.

Background

I am a retired [REDACTED] have operated my own small business for twelve years. I am filing this complaint as a private consumer, not in a commercial capacity. This vehicle was manufactured by Stellantis (RAM) in October 2023 in Saltillo, Mexico, and subsequently upfitted by AEV on January 12, 2024 at Lithia Desert Chrysler, Las Vegas, Nevada. The AEV upfit — designated the Prospector XL package — includes installation of AEV XP8100 front shock absorbers, lift components, fender flares, bedside steps, and associated structural modifications. I purchased this vehicle used on December 19, 2025 from Laura Buick GMC, Collinsville, Illinois, with approximately 6,957 miles.

AEV's Regulatory Obligation as Alterer

Under 49 CFR §567.7, AEV as an alterer of a previously certified vehicle is required to affix its own certification label confirming the vehicle continues to conform to all applicable Federal Motor Vehicle Safety Standards (FMVSS) after alteration. That non-delegable certification obligation means AEV bears independent federal responsibility for any safety

defects introduced or exacerbated by its upfit — defects that cannot be redirected to the original manufacturer.

Documented Safety Defects

The following safety-critical defects were confirmed by independent licensed technician inspection at Jackson Family Dealerships, Sullivan, Illinois (Repair Order [REDACTED] July 2026). These defects were not present in any prior repair record and were not disclosed at the time of sale:

1. **RIGHT FRONT LOWER BALL JOINT NUT** — backed off approximately two turns, confirmed loose by licensed technician. This condition allows dynamic knuckle movement under load and represents a severe loss-of-control risk. The defect was not flagged at a pre-sale Multi-Point Inspection performed by the selling dealer in August 2025 (MPI L254147A).
2. **RIGHT FRONT SHOCK ABSORBER MOUNT** — mounting tab sheared from the front axle. A Carlisle socket was found used as an improvised spacer in the shock eyelet — not factory components, not AEV components. AEV's own published XP8100 shock installation guide contains the following verbatim warning: "NOTE: Some trucks, primarily 2019+, have been found to have incomplete factory welds on the front axle shock mounts. AEV suggests inspecting these mounts for complete weld coverage around the perimeter of the brackets attaching them to the axle tube. If mounts are found to not be welded completely, the welds should be completed by a qualified welder to reduce chances of bracket failure due to the increased forces from the 8100 dampers and mounting." AEV's own installation procedure required its technicians to inspect and complete the factory welds on this vehicle's shock mounts before installing the XP8100 shocks. AEV has not confirmed that this inspection was performed at the January 2024 upfit. FCA separately issued Customer Satisfaction Notification W45 (NHTSA filing MC-10177516-9999) acknowledging front axle shock absorber bracket separation as a known failure mode on this platform, with remedies in some cases requiring full front axle replacement.
3. **DRAG LINK** — abnormal movement documented by the owner in a video recorded February 21, 2026, timestamped and GPS-verified at Tower Hill, Illinois. Insurance adjuster documentation (Auto-Owners Insurance, adjuster Paige G., March 5, 2026) confirmed zero front-end damage from a subsequent minor incident, establishing that the drag link condition predates and is independent of any post-purchase event.
4. **LEFT FRONT WHEEL BEARING** — loose with perceptible physical movement and audible rumble at road speed. Consistent with prolonged abnormal loading caused by the backed-off ball joint, which was present at or before the time of purchase.

5. TRACK BAR BOLT — cross-threaded and never properly torqued, permitting suspension movement.
6. TRANSFER CASE OUTPUT SHAFT SEAL — leaking, confirmed by Jackson RO 98201 as caused by “dramatic pinion angle that is a result of the lift kit.” Every major lift kit manufacturer (ReadyLift, Zone Offroad, BDS Suspension) produces and sells a transfer case indexing ring specifically for the 2019–2024 RAM 2500/3500 when lifted, because the lift changes the transfer case output angle and causes seal failure. AEV has not confirmed that a transfer case indexing ring was installed during the January 2024 upfit. If it was not, this is a direct consequence of an incomplete AEV installation.

AEV's Written Admissions

In a written email dated July 9, 2026, AEV Warranty and Technical Advisor Alec Ringhiser (aringhiser@aev-conversions.com) stated: “The 8100 shock mounts are the older style and can be/should be upgraded to the current style mounts.” He further stated: “We have found the addition of the new shock mount brackets to be an acceptable repair for the concern with the sheared mounting tab; the updated bracket encapsulates the original assembly and reinforces the connection to the axle with additional surface area.” These admissions confirm AEV's awareness that the shock mounts installed on this vehicle were a superseded design requiring upgrade — and that owners in this production window were not proactively notified.

ProCal Calibration Defect

AEV publicly acknowledged in March 2024 a ProCal ECU calibration error affecting the 2023/2024 RAM platform within the production window that includes this vehicle's January 2024 upfit date. The owner was never notified of this calibration issue and never received the ProCal module. Jackson RO 98201 documents a 20–30 mph shift anomaly consistent with an incorrect calibration. This represents a known, unaddressed defect within AEV's documented production window.

Relief Requested

I respectfully request that NHTSA's Office of Defects Investigation:

1. Open a defect investigation into AEV's Prospector XL upfit program, specifically regarding shock absorber mount integrity, transfer case indexing installation practices, and ProCal calibration compliance for the 2023–2024 RAM 2500/3500 production window;
2. Require AEV to provide documentation of its 49 CFR §567.7 certification process for VIN [REDACTED]

3. Determine whether AEV's failure to complete shock mount welds per its own installation procedure, and failure to install a transfer case indexing ring, constitute violations of applicable FMVSS;
4. Notify other owners of AEV Prospector XL-upfitted 2019–2024 RAM 2500/3500 trucks of the shock mount upgrade requirement, consistent with AEV's own written acknowledgment that the installed mounts are superseded.

I am prepared to provide all supporting documentation including the Jackson Family Dealerships Repair Order [REDACTED] AEV's July 9, 2026 written admissions, insurance adjuster documentation, timestamped video evidence, and the selling dealer's Multi-Point Inspection record upon request.

Respectfully submitted,

[REDACTED]
Tower Hill, IL
[REDACTED]

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

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Tower Hill, IL

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