

Inside this issue:

<u>Governor Northam Appoints New Board Members</u>	1
<u>Who Needs a Sales License?</u>	1
<u>Upcoming Events</u>	2
<u>Advertising Certified Pre-Owned</u>	2
<u>Risk of Consumer Returns</u>	3
<u>FTC Data Breach Guide for Business</u>	3
<u>Target for New Covid-19 Scam</u>	4
<u>#Hashtags</u>	5
<u>Driving and Cell Phones</u>	5
<u>Starting Compliance</u>	6
<u>Board Actions</u>	7
<u>Advertising Tips</u>	8
<u>D-O Class Schedule</u>	9
<u>What's Wrong With This Picture?</u>	10

CONTACT US

2201 W. BROAD ST.
SUITE 104
RICHMOND, VA
23220

dboard@mvdv.virginia.gov

www.mvdv.virginia.gov

William Childress,
Executive Director
Rick Sipe,
Operations Manager
Lisa Mack-Nelson,
Field Rep. Supervisor
804-367-1100

MOTOR VEHICLE DEALER BOARD

Dealer Talk

Governor Northam Appoints New Board Members

The MVDB is pleased to announce the Governor appointed 3 new Board members. Dennis Ellmer, Owner, CEO, and President of Priority Automotive. Mr. Ellmer has Franchise dealerships throughout the Commonwealth, and has Toyota, Infiniti, Acura, Hyundai, Chevrolet, Ford, Nissan, Honda, and Mazda. Mr. Ellmer will be on the Licensing, Advertising, and Transaction Recovery Fund Committees.

Andrew Wiley is Owner, President, and Dealer-Operator of Consumers Auto Warehouse, Inc., an Independent automobile dealer in Staunton, Virginia. Mr. Wiley is also the President of the VIADA. Mr. Wiley serves on the Dealer Practices, Licensing, and Transaction Recovery Fund Committees.

Mark E. Riblett is the Board's Citizen appointment. Mr. Riblett currently works as an Assistant District Engineer at the Virginia Department of Transportation. Mr. Riblett serves on the Dealer Practices, Advertising, and Transaction Recovery Fund Committees.

Please join us in welcoming our newest Board members!

Who Needs a Sales License?

The MVDB considers all Dealer-Operators, F & I Employees, Sales Managers, and any person paid to sell vehicles, as salespersons, and must have sales licenses. Legislation in 2006 expanded the definition of a motor vehicle salesperson to include those functions performed by the sales manager, dealer-operator, and dealer employees who are in the "F&I" side of the automobile sales industry. Anyone who performs functions as described in the following definition must have a salesperson's license. **Regardless of the working title an individual has, if they fit the definition, they must have a salesperson's license.** Section §46.2-1500, Definitions. "Motor vehicle salesperson" or "salesperson" means (i) any person who is hired as an employee by a motor vehicle dealer to sell or exchange motor vehicles and who receives or expects to receive a commission, fee, or any other consideration from the dealer; (ii) any person who supervises salespersons employed by a motor vehicle dealer, whether compensated by salary or by commission; (iii) any person, compensated by salary or commission by a motor vehicle dealer, who negotiates with or induces a customer to enter into a security agreement on behalf of a dealer; or (iv) any person who is licensed as a motor vehicle dealer and who sells or exchanges motor vehicles. For purposes of this section, any person who is an independent contractor as defined by the United States internal revenue code shall



Cont'd from pg. 1

Upcoming EVENTS

BOARD MEETINGS

Virtual meeting will be held on

Monday, March 8, 2021**

Dealer Practices Committee Meeting

Time: 9:00 a.m.

Licensing Committee Meeting

Time: Immediately following Dealer Practices Committee

Advertising Committee Meeting

Time: Immediately following Licensing Committee

Transaction Recovery Fund Committee Meeting

Time: Immediately following Advertising Committee

Full Board Meeting

15 minutes immediately following Transaction Recovery Fund Committee meeting.

**Click [HERE](#) for Virginia Town Hall to view meeting information.

MVDB will be closed

◆ February 15, 2021, Presidents Day



Who Needs a Sales License?

be deemed not to be a motor vehicle salesperson. It is important for you to study this definition as all employees of your dealership that meet any of the criteria as noted in the definition will need a salesperson's license. Don't assume that all your salespersons are properly licensed. Please remember that salespersons must be licensed in the name of your dealership in order to sell or participate in the sale of motor vehicles. Allowing someone to sell vehicles without first being licensed could cost you up to \$1,000 in civil penalties **per vehicle sold**. The "Search Active Dealers" feature on the Board's website allows you to view a list of salespersons licensed to your dealership.

Advertising Certified Pre-Owned

A factory-certified pre-owned car (CPO car) is a gently used vehicle sold by a franchised new car dealer of the same brand. They're typically gently used, accident-free, low-mileage vehicles that are only a few years old. Not long ago, only luxury automakers had CPO programs. Today, nearly every automaker offers certified used vehicles, including cars, pickup trucks, SUVs, and minivans.

They're different from other used cars in that they typically come with warranty coverage backed by their original manufacturer.

Not every car displayed on a Franchise dealer's lot will be a certified pre-owned vehicle. You will only find factory CPO cars at dealerships of the same brand. For example, you will only find a certified pre-owned Honda CR-V at a Honda dealer. If you see one marked "certified" on a Toyota dealer's lot, it won't be a factory-backed CPO vehicle.

Genuine factory-certified used cars are backed by their original manufacturers. Vehicles purchased through a factory program can receive warranty service at any of the brand's franchised new car dealerships.

The MVDB advises Virginia dealers who advertise the term "Certified Pre-Owned" should only advertise this term based on warranty coverage backed by the vehicle manufacturer.

There are many different advertising terms dealers may use to convey that your dealership may offer a certification or dealer warranty that is not specifically tied to a manufacturer. Make sure your advertising is not misleading customers.

[Back to pg. 1](#)

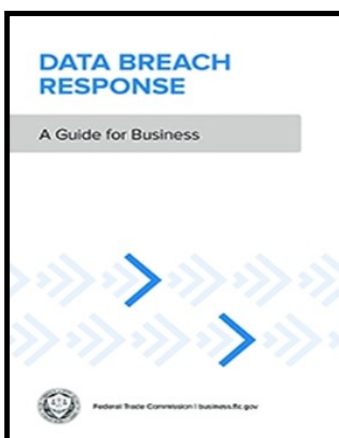
Risk of Customer Returns

The Board is receiving an increase in consumer complaints regarding dealers failing to get customers their title and registration within the time limits established by law. Dealers are required to get customers their titles and registration within thirty (30) days for Virginia residents, and an additional 30 days for out of state residents. Va Code, [46.2-1542](#) states in part that whenever a dealer “sells or conditionally sells and delivers to a purchaser a motor vehicle, the dealer may issue temporary license plates and a certificate of temporary registration. The temporary license plates and the certificates for temporary registration may be issued if (i) the dealer has the title or the certificate of origin for the vehicle or (ii) is unable at the time of the sale to deliver to the purchaser the certificate of title or certificate of origin for the vehicle because the certificate of title or certificate of origin is lost or is being detained by another in possession or for any other reason beyond the dealer's control.” In subsection C, it states in part, “If the dealer does not produce the certificate of title or certificate of origin to the vehicle before the expiration of the second temporary certificate, **the purchaser's rights to the vehicle under this section may terminate and he shall have the right to return the vehicle** as provided in subsection B.”

Dealer Title Helds: DMV allows dealers to title a customer's vehicle with missing documentation by placing a dealer title held on the vehicle. This stops the title from printing until the missing documentation is provided to DMV (e.g., the prior title is held up by the lienholder). Utilizing dealer title helds allows dealers to meet their 30-day titling requirement when they are still missing documentation normally required to title the vehicle. To place a title held onto a vehicle, the dealer must deliver to the Department an application for title, copy of the bill of sale, **all required fees** and a written statement of facts describing the dealer's efforts to secure the certificate of title or certificate of origin to the vehicle.

DMV only offers this to dealers. However, it is the dealer's responsibility to submit the missing documentation. DMV has noticed an increase in dealers not submitting the remaining documentation to remove the dealer title held. Consequently this delays the customer's ability to receive their title, which causes customer frustrations. It may also reflect poorly on the dealership and should be avoided by submitting the required documentation as soon as it is received. DMV will send letters to the dealership, lienholder and customers advising them of the need for additional documentation to release the dealer title held.

FTC Data Breach Guide for Business



This guide addresses the steps to take once a breach has occurred. For advice on implementing a plan to protect consumers' personal information, to prevent breaches and unauthorized access, check out the FTC's *Protecting Personal Information: A Guide for Business* and *Start with Security: A Guide for Business*.

Reminders...

[§46.2-1529.1](#) The Federal Trade Commission's (FTC) Used Car Rule requires dealers to post a [Buyers Guide](#) in every used car they offer for sale. This includes light-duty vans, light-duty trucks, demonstrators, and program cars. Demonstrators are new cars that haven't been owned, leased, or used as rentals, but have been driven by dealer staff. Program cars are low-mileage, current-model-year vehicles returned from short-term leases or rentals. Buyers Guides do not have to be posted on motorcycles and most recreational vehicles.

Target for New Covid-19 Scam

There's a new coronavirus-related scam making the rounds, but this time the crooks are targeting small businesses. It starts with an email that claims to come from the "Small Business Administration Office of Disaster Assistance." It says you're eligible for a loan of up to \$250,000 and asks for personal information like birth date and Social Security number. Let's do a CSI-style investigation to spot clues that the email is a fake.

Clue #1. You got an email or phone call out of the blue that claims to be from the IRS, the Social Security Administration, or – in this case – the Small Business Administration. The FTC has warned about government imposter scams like this.

Clue #2. You were told that you're automatically eligible for a big loan. Real lenders never do this.

Clue #3. You're asked to hand over your date of birth and Social Security number. This is a tip-off that the sender is trying to steal your personal information.

Phishing attempts aren't the only scam that business owners are reporting. We've heard from people who have applied for loans through websites pretending to be part of the SBA's Economic Injury Disaster Loan program, which has been extended to December 31, 2021. And other people report they've been contacted to re-pay loans they never took out. The likely culprits? Criminals who illegally applied for loans in their name.

Here are steps you can take to help protect yourself.

Check your credit report. The worst time to learn that someone has taken out a loan in your name is when you're applying for a loan yourself. So check your credit report first at www.annualcreditreport.com, the authorized source for the free reports consumers are guaranteed by law. In addition, the three major credit bureaus are offering free weekly online reports to consumers through April 2021. If you're not in the market for credit or a loan, freezing your credit offers an extra – and free – measure of protection.

Look for reliable sources of information. Looking for a loan? Don't click on a link in an unsolicited email and be careful with online search engine results. Scammers often bait their online traps with sound-alike names and URLs, phony endorsements, and professional-looking websites. For small business owners looking for COVID-relief programs, always start at www.sba.gov, the official site of the Small Business Administration.

Or reach out to a trusted financial institution in your community.

Check out lenders before sharing personal information. Scammers who impersonate lenders have the perfect excuse to ask you for lots of personal information that can be used to steal your identity. Don't leave a trail of personal information exposed by filling out lots of applications online with lenders you don't know. Investigate lenders first and if you spot something amiss, stop. And then file a report at ReportFraud.ftc.gov.

Reminders...

ALL IDO's of independent dealerships must recertify their IDO qualification every three years by either taking an online course, classroom course, or by passing an administered DMV test. Click [HERE](#) for more information and [HERE](#) to determine your recertification deadline. Please note that dealers with Franchise endorsements are exempt from recertification. If you are unclear on your recertification deadline, or any other recertification questions, please contact Ann Majors at the MVDB. She may be reached at 804-367-1100 x 3016#, or email at ann.majors@mvdb.virginia.gov



Reminders...

§46.2-1528 gives the Board or authorized representatives of the Board authority to examine dealer records, during the posted business hours of dealerships. §46.2-1529 requires all Motor Vehicle Dealers to keep the originals or a copy of all original records at the site (dealership) of origination for five (5) years. Dealer records would include records regarding employees; lists of vehicles in inventory for sale, resale, or on consignment; vehicle purchases, sales, trades, and transfers of ownership; collections of taxes; titling, uninsured motor vehicle, and registration fees; odometer disclosure statements; records of permanent dealer registration plates assigned to the dealer and temporary transport plates and temporary certificates of registration; proof of safety inspections performed on vehicles sold at retail; and other records required by the Department or the Board shall be maintained on the premises of the licensed location.

#Hashtags

In social media advertising, if you use #hashtags, the FTC still requires full disclosures through hashtag.

Exercise care when using hashtags to disclose information that is necessary to avoid deception. A hashtag at the end of a social media post might not convey the information effectively, especially if appears in a string of other hashtags or if the other hashtags arguably contradict it. Just a reminder: Advertisers are responsible for all reasonable interpretations of their advertising, including ads on social media that make claims or that fail to make adequate disclosures.

Driving and Cell Phones

As of January 1, 2021 it will be illegal to drive and hold a mobile device in your hand while doing some activities, such as:

- Dial a phone number
- Send a text message
- Update/browse social media
- Video conference
- Shop online
- Watch movies
- Check the weather
- Play games and more.

In the event that you are pulled over for holding a handheld personal communications device, act in the same manner you would for any traffic stop. You will NOT be asked to hand the device over to the officer. Keep in mind that WHAT you are doing with the device is irrelevant, it is the act of HOLDING the device while driving that is illegal. A person who violates 46.2-818.2 is subject to a fine of \$125 for the first offense and \$250 for the second and subsequent offenses. A person who is convicted of reckless driving who was also in violation of 46.2-818.2 when committing the offense can be fined up to \$2,500, up to 12 months in jail, and up to a six month license suspension, but shall be fined a mandatory minimum fine of \$250. A person who violates this law while driving in a highway work zone shall be fined \$250.

Starting Compliance

We have all heard the Chinese proverb saying, “A journey of a thousand miles begins with a single step.” Well, you are going to hear it once again today!

I am often asked, “how do I start a compliance program at my dealership?”

So, to start your compliance program, put your commitment in writing.

This will be more important than ever as the new administration has nominated an “enforcer” to head the Consumer Financial Protection Bureau (CFPB).

Alan Wingfield, attorney at Troutman Pepper says, “companies that are subject to close regulatory oversight can get a lot of value in implementing a Compliance Management System. With a little bit of paperwork, you can document what you are already doing anyway that a regulator will like.”

The most important notion of what Alan says is this: If it’s not on paper, it doesn’t exist.

That’s the truth of the automobile business. “He said,” or “she told me,” doesn’t cut it. Everything has to be in writing. See the example below.

Motor vehicle sales and financing vehicles have extensive regulations, so it is import you have strong compliance processes. Your Compliance Officer will be responsible for internal review, monitoring, and appropriate remediation of your policies and procedures to protect consumers. The Officer should report to the Board on a regular basis. That’s it. Start now. Commit to this in writing, appoint a Chief Compliance Officer, and move forward.

Remember, if it’s not in writing, it didn’t happen.

Tom Kline www.BetterVantagePoint.com

CONSUMER PROTECTION COMPLIANCE CHARTER

Purpose:

The Chief Compliance Officer assists the Board of Directors in the oversight of _____’s Compliance Program. Its duties and responsibilities are to:

- Design a Compliance Program to help prevent and/or detect violations of the law or the standards of business conduct;
- Oversee and monitor adherence to the policies and procedures and Compliance Program;
- Ensure that communication of the Compliance Program is disseminated to all staff;
- Review reports and actions taken resulting from compliance investigations or audits;
- Oversee and monitor the resources assigned to the Compliance Program to assess their adequacy;
- Review materials that are presented to the Board regarding compliance;
- Review the compliance education and training program;
- Perform such other duties and responsibilities as may be requested by the Board.

Reporting Structure:

- The Chief Compliance Officer reports quarterly to the (Owner or) Board of Directors.

Members:

The Chief Compliance Officer is _____. The Members of the Board to whom he reports are _____.

Insert signature lines here.

Here’s more:

RESOLUTION RELATING TO THE CONSUMER PROTECTION REGULATORY MANAGEMENT PROGRAM

WHEREAS, the Board of Directors exercises general oversight authority with respect to the Company’s programs, policies and procedures for legal and regulatory compliance; and

WHEREAS, in light of increasing scrutiny by regulators of business practices in the motor vehicle sales and finance industries, it is desirable at this time to reaffirm the Board’s oversight with respect to the Company’s regulatory management programs relating to U.S. federal and state consumer financial protection laws;

NOW, THEREFORE, BE IT RESOLVED, the Board hereby delegates authority to the Chief Compliance Officer pursuant to its Charter to provide reasonable assurance that the Company maintains appropriate ethical and legal consumer compliance programs and review of its effectiveness;

FURTHER RESOLVED, that the Board hereby approves the Statement of Consumer Protection Policy (which you will need to write) and the Company’s consumer protection regulatory management program (the “Program”) described therein and presented at this meeting to the Board, including the summary of risk oversight to govern the material risks, issues and resolution regarding the Program; and

FURTHER RESOLVED, that the Chief Compliance Officer’s general oversight with respect to the Company’s regulatory compliance programs, policies and procedures, significant legal or regulatory compliance exposure, and material reports or inquiries from government or regulatory agencies shall include without limitation, the Program; and

FURTHER RESOLVED, that the appropriate officers of the Company are authorized to do all things necessary or appropriate to carry out the purpose and intent of the foregoing Resolutions.

Insert signature lines here.

Board Actions

Dealer Practices

Informal Fact-Finding Conferences:

Virginia Auto Sales and Muhammad Junaid Bashir - On November 10, 2020, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain dealership records.. Based on the information provided at the conference, the Board assessed a \$250.00 civil penalty and a satisfactory inspection within 90 days. Mr. Bashir may appeal to a Formal hearing.

D & S Imports, LLC and Diego S. Canzobre - On November 17, 2020, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain an established place of business, dealer records, liability insurance, and failure to comply with previous warnings.. Based on the information provided at the conference, the Board mandated a satisfactory inspection within 60 days, and revocation of all licenses if any non-compliance is found during that inspection. Mr. Canzobre may appeal to a Formal hearing.

Administrative Actions:

Kingdom Kars Auto Sales LLC and Michael Bradford Hathaway. Paid a \$250 civil penalty for failure to maintain dealer records, proof of safety inspection prior to retail sale, and records of all dealer plates.

Dulles Car, and Mehmet F. Gunan. Paid a \$250 civil penalty for failure to maintain dealer records, proof of safety inspection prior to retail sale, and failure to conspicuously post the processing sign in a public area.

Bond's Auto Sales, and Mickey Bond. Suspended and sent to debt set-off for failure to pay a \$250 civil penalty for failure to maintain dealer records, and proof of safety inspection prior to retail sale.

Autoxport Corp, and Shakira Torres. Paid a \$500 civil penalty for failure to maintain dealer records, and salespersons licensed and paid on a W-2.

Friendship Motorsports, and Mitch Walters. Paid a \$250 civil penalty for failure to maintain dealer records, and proof of safety inspection prior to retail sale.

Koons Automotive, Inc., and John Koons III. Paid a \$250 civil penalty for unlicensed salespersons.

Car Credit Nation, and Christopher Maher. Paid a \$250 civil penalty for mis-use of D-tags.

AMS Auto Sales LLC and John B. Johnson. Suspended for non payment of a \$750 civil penalty for unlicensed salespersons, dealer records, and failure to maintain liability insurance on each D-tag,

Morgan McClure Chevrolet Buick Cadillac Inc., and Timothy D. Morgan. Paid a \$750 civil penalty for failure to maintain dealer records, failure to maintain records of D-tag usage, and failure to comply with previous warnings.

Copan Auto, and Dayana Rossibell Martinez. Paid a \$4,000 civil penalty for failure to maintain PoD records.

Harding's Auto Sales, LLC, and Brent Harding. Suspended for failure to pay a \$750 civil penalty for failure to maintain dealer records, odometer records, and mis-use of D-tags.

Muhammad's Auto sales, and Muhammad Jamed Wilson. Paid a \$1,500 civil penalty for failure to maintain dealer record, proof of safety inspection prior to retail sale, salespersons licensed and paid on a W-2, and records of D-tag usage.

Board Actions

Advertising

Administrative Actions:

C & J Auto Sales, and Michelle A. Coonley. Paid a \$250 civil penalty for a Craigslist advertisement that did not disclose the processing fee, and the telephone number used in the advertisement is not the dealership phone number on file with the Board.

For prior issues of Dealer Talk click [HERE](#)

Advertising Tips

The Board has recently seen an increase in advertisements offering to match down payments or offer a guaranteed amount of money for a trade in. The Board considers this type of advertising unfair, deceptive, or misleading. These advertisements are not allowed under Virginia Regulation 24VAC22-30-30 J. "Advertisements of dealer rebates shall not be used. Offers to match down payments or guarantee minimum trade-in allowances or offers of cash or money back are forms of dealer rebates."

Many of the rebates and incentives offered by manufacturers are not available to everyone. As such it is deceiving to advertise a vehicle for a price that includes all of the available rebates and incentives if everyone is not qualified to receive all of the rebates and incentives, or if rebates are mutually exclusive. (example: \$1,000 loyalty rebate and \$1,000 first time buyer rebate). Adding a "disclaimer" that requires consumers to determine what incentives and rebates for which they qualify does not "fix" the fact that the advertised price does not apply to everyone. When advertising a price of a vehicle that is eligible for rebates/incentives, that price may be based on incentives and rebates that are available to ALL purchasers. If other incentives/rebates are available based on specific criteria (e.g. military rebate) these additional incentives/rebates can be listed but not subtracted from the advertised price. Also, if a specific vehicle is advertised, the advertisement may not include "Amount" if the stated "up to" dollar amount is not available for that vehicle.

Reminders...

Regarding MVDB forms, be sure to completely fill out all forms in their entirety. For example, in the MVDB 61, be sure that both the applicant AND the dealer sign the fully completed form. The Board recommends that the applicant enter all the information in sections (1), (2), and (3) of the MVDB 61 and sign at the bottom of section (3). In section (3), if the applicant has convictions, be sure to truthfully disclose convictions by checking the appropriate box "yes." Convictions alone may not exclude an applicant from being licensed, but checking "no" on the application, when the background check reveals convictions, is considered a material misstatement. Next, the dealer should review the application for accuracy, complete section (4), complete the background check, sign as the employing dealer, and include the proper fee before submitting the application to the Board. Finally, remember that applicants may NOT engage in any sales activities until the sales license is processed by the MVDB.

IMPORTANT NOTICE TO PROSPECTIVE DEALERS

The path to a Dealer-Operator license begins with a required two-day course of study each month at various community colleges in Virginia with the curriculum and instruction provided by VIADA. The course takes the attendee from establishing the dealership under local zoning and Dealer Board requirements, through the sales process with its multitude of forms, laws and regulations, into a sampling of opening and operating expenses, and ending with a discussion on ethics. The course is also open to all existing dealers and their employees.

THE FOLLOWING COURSES ARE REGISTERED THROUGH VIADA,

CALL 1-800-394-1960 to register or visit viada.org

2021

February 9-10

Hampton Inn & Suites Roanoke Airport (5033 Valley View Blvd W NW, Roanoke, VA 24012)

February 23-24

Richmond Downtown Hilton (501 E Broad St, Richmond, VA 23219)

March 9-10

Home2 Suites by Hilton (43340 Defender Dr, Chantilly, VA 20152)

March 23-24

Courtyard Marriott (2136 Riverside Dr, Danville, VA 24540)

April 6-7

Double Tree by Hilton (990 Hilton Heights Road, Charlottesville, VA 22901)

April 20-21

Spring Hill Suites (1997 Power Plant Pkwy, Hampton, VA 23666)

May 11-12

Holiday Inn (20 Sanford Dr., Fredericksburg, VA 22406)

May 25-26

Richmond Downtown Hilton (501 E Broad St, Richmond, VA 23219)

June 8-9

Hampton Inn & Suites Roanoke Airport (5033 Valley View Blvd W NW, Roanoke, VA 24012)



Please click [HERE](#) or on the graphic on the left to view our Dealership Education videos!

More videos will be uploaded on an ongoing basis, so stay informed and receive notifications when new videos are released. The MVDB Education video library will eventually cover a wide range of topics that Dealerships can use to remain compliant with Virginia Code.

You may also access these videos from a link on our website Home page.

BE SURE TO SUBSCRIBE TO OUR [MVDB CHANNEL](#)!

MOTOR VEHICLE DEALER BOARD

MVDB

2201 W. Broad Street Suite 104

Richmond, VA 23220

Phone: 804-367-1100

Fax: 804-367-1053

E-mail: dboard@mvdb.virginia.gov

Editor: Ann Majors

Visit us on the Web!

www.mvdb.virginia.gov

DISCLAIMER: We make every effort to ensure information in Dealer Talk is accurate, but it is not a substitute for legal advice.



MVDB Mission Statement

The Motor Vehicle Dealer Board will administer sections of the Commonwealth's Motor Vehicle Dealer Laws and regulations as charged; promote the best interest of both the automotive consumer and dealer community; while providing a high level of customer service.

What's Wrong With This Picture?



Improper use of Dealer Tag.

The Code of Virginia states in part that it is unlawful for any dealer to permit dealer's license plates to be used on : §46.2-1550 A (4) Vehicles used in conjunction with any other business. In this instance, you cannot use a D-tag on a snow removal vehicle.