

October 2019 Volume 22, Issue 130

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Buyers Order Online Dealer Fees

As part of our routine inspections, the Board views overcharging fees to customers on the buyers order to be a violation of Virginia Code, and the Board may take action. If a dealer uses Print on Demand (PoD) 30 day temporary plates, or uses an Online Dealer system to deliver "hard" plates to the purchaser, the dealer may only pass on to the customer the exact amount the dealer is charged. PoD tags are \$3.00 per set, so the dealer may only charge a purchaser \$3.00 on the buyers order for the 30 day temporary tags. Similarly, the dealer may only charge the customer the exact amount the online dealer vendor charges the dealer. This requirement applies to both temporary PoD tag fee and the "online systems filing fee." On a buyers order, §46.2-1530 is clear on exactly what fees can be collected by the dealer, on behalf of the customer. The dealer is only collecting the actual fees that the customer would be responsible for if the customer chose to process their own title and registration work themselves. Thus, dealers are not allowed to increase these fees or approximate these fees at the dealer's discretion. If you are not an online dealer, you may not charge an online systems filing fee on your buyers order. Most dealers use a computerized dealer management system for the buyers order that allows dealers to calculate these pass through fees automatically. Please be aware that these automatic calculations are only as good as the information input into the dealer management system. As a best practice, the Board recommends that dealers validate the fees printed on their buyers order with their dealer management system as part of their ongoing computer system maintenance.

Advertising Freight

When advertising <u>new</u> vehicles, and the vehicle is being delivered directly from the manufacturer to the franchise dealership or customer, the freight charge must be properly disclosed in a dollar amount in the advertisement. This advertising disclosure must be the amount charged that appears on the MSRP, not a dollar amount range. In addition, Virginia law and regulations require disclosures to be <u>clear and conspicuous</u>, and in boldface type no smaller than 8-point typeface.

When advertising <u>used</u> vehicles, freight charges may not be advertised or charged. A freight fee cannot be charged on any preowned vehicle, nor can it be charged to the customer for the movement or transport of the vehicle to the licensed dealership location. Transfer fees may only be allowed when a dealership has multiple locations and the customer requests the vehicle be transferred to another dealership



Upcoming EVENTS

BOARD MEETINGS

All Meetings are held at DMV Headquarters 2300 W. Broad Street, Room 702 Richmond, VA

Monday, November 4, 2019

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

<u>Time: 10:00 a.m.</u> or 5-15 minutes immediately following Transaction Recovery Fund Committee meeting.

MVDB will be closed

- ♦ Monday, October 14, 2019
- ♦ Monday November 11, 2019
- ♦ Close at 12:30 p.m., Wednesday November 27, 2019
- ♦ Thursday, November 28, 2019
- ♦ Friday, November 29, 2019



Cont'd from pg. 1

Advertising Freight

location, the transfer fee may be charged. Freight and transfer

fees must be clearly and conspicuously disclosed. Both new and used vehicles may charge additional charges for customers who have purchased the vehicle and want the vehicle delivered. This delivery charge would not appear on the buyers order and would be a separate financial transaction in addition to the buyers order purchase. For additional guidance, please click HERE to view our Advertising Guidance document related to

False Pretense Insurance

The following story came to the MVDB from the Iowa Independent Dealers Newsletter. It speaks about Iowa, but is extremely relevant to Virginia dealers.

freight charges. Click HERE for transfer fees guidance.

"Do you ever wonder why we preach about doing business at your dealership and know whom you are dealing with? One of our members sold a vehicle to an Illinois resident - \$17,000 unit. Never saw the customer – contacted dealer over the internet – sent driver's license and other required documents to get a loan – an Iowa credit union took the loan. Dealer delivers car to Illinois and discovers that the customer had stolen the identity of another person - dealer is told by the credit union - "you must reimburse us for this loan". Dealer does so and contacts his insurance company to file a claim to recoup the \$17,000. Insurer says - hold your horses - you do not have the proper coverage for such a claim. What says the dealer ?? Dealer did not have false pretense coverage. Dealers need to make sure their insurance policy has false pretense coverage – we' re told a lot of dealer's don't purchase it!!! This type of insurance provides coverage for loss or damage to the automobile that results from the insured's voluntarily parting with an automobile if induced to do so by any fraudulent scheme, trick, device or false pretense, or the insured's acquiring the automobile from a seller who did not have legal title. The coverage may be written only in connection with Comprehensive or Named Perils Coverage."

The MVDB agrees, that this type of insurance coverage should be considered, and that all dealers may want to incorporate this type of insurance.

The Virginia State Corp Commission has free insurance brochures that are available to dealers to offer basic guidance on insurance. If you would like to receive any of the available State Corporation Commission resources, please click on the link and follow the ordering instructions.

http://scc.virginia.gov/boi/pubs.aspx

Beware of Flood Vehicles

The Better Business Bureau (BBB) is warning Virginians to be on the lookout for flood-damaged vehicles in the wake of Hurricane Dorian.

"Following floods, scammers try to pawn off flooded vehicles as standard secondhand cars," said the BBB. "Flood -damaged vehicles will no doubt pop up at auto auctions, used car dealerships, and especially in classified ads. While state law requires water damage to be reported on a vehicle's title, dishonest sellers can find ways to circumvent the law. More than 325,000 flooded vehicles were put back in use in 2017, according to CarFax. Water damage can be hidden beyond visible signs like rust and mold. It could also cause a vehicle's electrical systems to erode and fail over time. Computer sensors could be damaged and safety protections like air bags could

The BBB has the following tips for car shoppers:

fail in a crash, officials say.

Ask to see the title. Check the date and place of transfer to see if the car came from a flood-damaged state and if the title is stamped "salvage."

Carefully check the dashboard and electronic components. Examine all gauges to make sure they are accurate, and there are no signs of water. Look for indications that the dashboard may have been removed. Test the lights, wipers, turn signals, radio, heater and air conditioner several times.

Check the interior spaces. Look in the trunk, glove box, and beneath the seats and dash for signs of rust or water damage. Check for open drainage holes in the bottom of the vehicle. Look for discolored, faded or mildewed upholstery and carpeting. Recently shampooed carpets may be cause for concern.

Get a vehicle history report from a database service. The National Insurance Crime Bureau's (NICB) free database lists flood damage and other information. But take note: NICB reports are only helpful if the car was insured. If the owner of an uninsured flood-damaged car tries to sell it on the open market, you may never know there's a problem until things like the electrical system go bad.

Remember to check under the hood. Look for standing water, mud or grit in the spare tire wheel well or around the engine compartment under the hood.

Do a smell test. A heavy aroma of cleaners and disinfectants might be masking problem.

Research the dealer. Always check out the BBB Business Profile of the dealer at <u>bbb.org</u>.

Get an inspection. Before buying any used car, you should get a pre-purchase inspection by a trusted mechanic. Click here for more tips on buying used cars.

Before purchasing a vehicle, customers are encouraged to check the vehicle's history with the National Motor Vehicle Title Information System (NMVTIS). By submitting the vehicle's make, model and vehicle identification number (VIN), the service can identify flood-damaged or unsafe vehicles prior to titling.

The fee for NMVTIS is \$12 per vehicle. The service is available online or by visiting a DMV office.

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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

DMV News

Independent Dealer Mandate

Effective January 1, 2020, all applications for title and registration of vehicles processed by an Independent motor vehicle dealer that sold at least 100 vehicles in the previous calendar year must be processed on-line. Currently, the mandate for independent dealers to process on-line applies only to dealers that sold 200 vehicles in the previous calendar year. Pursuant to Virginia Code § 46.2-216.1, DMV has the administrative authority to mandate electronic filing of any type of document or payment, provided 12 months' written notice is given. In accordance with that authority, DMV mailed a letter of notice dated December 26, 2018, to independent dealers meeting the criteria, to comply with the new mandate by January 1, 2020. To comply, DMV required that your vendor selection was completed by September 1, 2019, and begin processing on-line on January 1, 2020. As a reminder, please visit our website at http://www.dmv.virginia.gov/commercial/#odealer/index.asp to learn more about the on-line dealer program and to find contact information for the four authorized on-line dealer program vendors. Questions? Call Online Vehicle Programs Work Center: 804-367-2715.

40 under 40

Congratulations to two Virginia independent dealers for being chosen for Automotive Remarketing 40 under 40. Here are the excerpts from the Automotive Remarketing article.

Wyatt Carter

GM Richmond Auto Auction

"I had no intention of making a career out of the auction business when I started nearly 15 years ago. Countless cars later, I'm still here and in the most rewarding career I could imagine for myself. I never thought a business could teach me so much, but looking back at my time in this industry, that's what makes me so proud — my ability to continuously learn. I strive to master each challenge that I encounter and am fortunate to learn something new each day. I credit Sanford Auto Dealers Exchange with the foundation of my auction knowledge. Here is where I learned those early lessons of how the auction business really works. Later, ADESA taught me the corporate world of metrics, efficiencies and procedures. "Those lessons culminated into my current position at Richmond Auto Auction, where I have the honor of serving as general manager. I have the best team in the country. They have worked with me every step of the way to make the Richmond Auto Auction into a model auction I am extremely proud of. I strive to better myself and the company every day. Countless co-workers, mentors, clients, family members and friends have all taught me many valuable lessons that I use every day. I wish I could name them all, but each one has shaped me into the person who I am today."

Joel Bassam

Director of Marketing, Easterns Automotive Group

"I am most proud that my family's business has been able to grow and succeed. I began my career at Easterns when I was 12 years old. I started out washing cars, and then a few years later, I moved into the body shop, advancing through multiple departments on weekends and summers during high school and college. "I have learned that what sets us apart from other businesses is the family environment we have created. The majority of our staff has worked for Easterns for more than 10 years which allowed me to work for and learn from the best. We were named a top place to work in D.C. by The Washington Post, an award I am most proud of because it is was won based only on employee satisfaction measured against other businesses. In my current role, I adjusted our company's strategy and image to grow at least 10% in sales volume year over year for the last five consecutive years, while also growing our Easterns family to over 300 people. My mindset has always been, 'the customer is my algorithm.' If I focus on their needs as a guiding principle and maintain efficient, thoughtful and centralized processes, everything else will fall into place."

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Board Actions

Dealer Practices

Informal fact-finding conferences:

Amazing Grace Auto Sales and Emmanuel A. Yeboah – On July 23, 2019, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain posted business hours, and failure to comply with previous warnings. Based on the information provided at the conference, the Board assessed a civil penalty of \$750. Mr. Yeboah may appeal to a Formal hearing.

HGS Auto Sales and Hussam Salman – On July 15, 2019, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain posted business hours, and failure to comply with previous warnings. Based on the information provided at the conference, the Board assessed a civil penalty of \$750 and a satisfactory inspection. Mr. Salman may appeal to a Formal hearing.

Expo Auto Brokers, LLC and Michael H. Martin – On July 22, 2019, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain posted business hours, and failure to comply with previous warnings. Based on the information provided at the conference, the Board assessed a civil penalty of \$1,250 and a satisfactory inspection. Mr. Martin may appeal to a Formal hearing.

North End Motors, LLC and Hassan E. Ali – On August 6, 2019, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain posted business hours, and failure to comply with previous warnings. Based on the information provided at the conference, the Board assessed a civil penalty of \$1,500 and a satisfactory inspection. Mr. Ali may appeal to a Formal hearing.

Great Affordable Autos, LLC and Naftali Lev – On August 8, 2019, an informal fact-finding conference was conducted to address the alleged violations of failure to employ salesperson on a W-2 and provide liability insurance on dealer tags. Based on the information provided at the conference, the Board assessed a civil penalty of \$500. Mr. Lev may appeal to a Formal hearing.

RHD Japanese, LLC and Ahmed Wahedi – On July 29, 2019, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain posted business hours, and failure to comply with previous warnings. Based on the information provided at the conference, the Board assessed a civil penalty of \$750. Mr. Wahedi may appeal to a Formal hearing.

Exquizit Auto Sales and Eric L. Johnson – On August 15, 2019, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain dealer records and failure to comply with numerous previous warnings. Based on the information provided at the conference, the Board assessed a \$1,000 civil penalty, a 30 day suspension, and a satisfactory inspection. Mr. Johnson may appeal to a Formal hearing.

Udrive Autos and Sohail Shaikh. On August 29, 2019 an informal fact-finding conference was held to address the alleged violations of failure to maintain posted business hours. Based on the information provided at the informal fact-finding conference, the Executive Director agreed with the hearing officer's recommendation and a decision was issued to require a satisfactory inspection. Mr. Shaikh may appeal to a Formal hearing.

Carrington Motor Group LLC and Rasean Greene. On August 13, 2019 an informal fact-finding conference was held to address the alleged violations of failure to maintain liability insurance on each dealer tag. Based on the information provided at the informal fact-finding conference, the Executive Director agreed with the hearing officer's recommendation and a decision was issued to take no action against this dealer at this time. Mr. Greene may appeal to a Formal hearing.

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Board Actions

2nd Chance auto Sales Inc. and Robin Alesia Bryan. On April 22, 2019 informal fact-finding conference was held to address the alleged violations of failure to maintain posted business hours. Based on the information provided at the informal fact-finding conference, the Executive Director agreed with the hearing officer's recommendation and a decision was issued to assess a \$750 civil penalty. This dealer was sent to Debt set-off for failure to pay the civil penalty.

EZ Auto Sales Corp and Oussama Elguennouni. On August 28, 2019 an informal fact-finding conference was held to address the alleged violations of failure to maintain liability insurance on each dealer tag. Based on the information provided at the informal fact-finding conference, the Executive Director agreed with the hearing officer's recommendation and a decision was issued to issue a written warning. Mr. Elguennouni may appeal to a Formal hearing.

Formal Hearings:

Virginia Finance Group, LLC and Nicole M. Parker – On January 10, 2019, an informal fact-finding conference was conducted to address the alleged violations of failure to maintain liability insurance on each dealer tag. Based on the information provided at the conference, on March 11, 2019, the Board adopted a resolution assessing a civil penalty of \$500, satisfactory inspection by September 30, 2019, and suspension of all licenses and certificates issued by the Board to Virginia Finance Group, LLC and Nicole Parker until September 30, 2019. On April 15, 2019, Ms. Parker appealed for a Formal hearing. On June 27, 2019, a Formal hearing was conducted to address the alleged violations of failure to maintain liability insurance on each dealer tag. Based on the information provided at the Formal hearing, the Board assessed a civil penalty of \$500, suspension of all licenses until September 30, 2019 and a satisfactory inspection. Ms. Parker may appeal to Circuit Court.

Administrative Actions:

Grafton Auto Sales and Brian W. Cooke. Suspended due to failure to pay a \$250 civil penalty for salespersons not on a W-2.

Automax of Virginia, Inc. and Barry J. Adenauer. Paid a \$1,000 civil penalty for failure to maintain dealer records

Sampson Motorcars and Sampson Yemane Beyen. Paid a \$250 civil penalty for failure to maintain posted business hours.

4 Wheel Auto Sales and Nancy Majano. Paid a \$750 civil penalty for failure to maintain posted business hours.

My Car LLC and James C. Archbell III. Paid a \$16,250 civil penalty for unlicensed salespersons, salespersons paid on a W-2, and failure to maintain dealer records.

Fatboyz Auto Brokers and Carol O. Denning. Paid a \$2,400 civil penalty for failure to maintain dealer records, and failure to maintain liability insurance on each dealer tag.

Legacy Automotive Group LLC and Mason S. Reese. Paid a \$1,000 civil penalty for failure to maintain dealer records, and failure to maintain liability insurance on each dealer tag.

ProAuto Expo Inc. and Talha Chaudhry. Paid a \$250 civil penalty for failure to maintain dealer records.

Dog Town Auto Parts and Carl Rasnake. Paid a \$250 civil penalty for failure to maintain dealer records.

Board Actions

R L Auto Sales LLC and Louis Patrick Llewellyn. Suspended for failure to pay a \$750 civil penalty for failure to maintain posted business hours.

Wholesale Auto Export and Samei Ali Bakheit. Suspended for failure to pay a \$750 civil penalty for failure to maintain posted business hours.

Aim Auto Sales and Qasim Javed Bajwa. Paid a \$750 civil penalty for failure to maintain posted business hours.

2K Automotive and Anthony Bivins. Suspended for failing to pay a \$1,000 civil penalty for failure to maintain dealer records, and failure to maintain liability insurance on each dealer tag.

DHK Auto Sales LLC and Hishyar Shahab. Sent to Debt set-off for failure to pay a \$750 civil penalty for failure to maintain posted business hours.

SEB Auto Group and Kevin Burton. Sent to Debt set-off for failure to pay a \$2,250 civil penalty for failure to maintain dealer records, and failure to maintain liability insurance on each dealer tag.

Advertising

Administrative Actions:

Number 1 Auto Group LLC and Gurpreet Singh. Paid a \$250 civil penalty for advertising under the owner category on Craigslist, and failing to disclose the processing fee.

Motomember/Automember and Vasily Mulyar. Paid a \$250 civil penalty for website failing to disclose the processing fee.

Nation Motors of Fredericksburg LLC and Luis Munayaco. Paid a \$250 civil penalty for failure to disclose processing fee, and advertising under the owner section and not the dealer section in Craigslist. The advertised price is a cash only price. If the advertised price is cash only it should state "cash only" next to the advertised price and not placed in the disclaimer. Also, the disclaimer states "on-line prices reflect rebates and discounts"; however, an independent dealer cannot offer rebates.

Capitol Motors, LLC and Luis Munayaco. Paid a \$250 civil penalty for Dealer advertised price failed to state cash only prices, and advertising on Craigslist under the owner category instead of the dealer category. Also, the disclaimer states prices include rebates and discounts. An independent dealer cannot offer rebates.

ABC Dieselz and Jason Drew Adams. Sent to Debt sett-off for failing to pay a \$250 civil penalty for advertising on Craigslist under the owner category instead of the dealer category. Also, the ad failed to disclose the \$395 processing fee.

Fast Auto and Leah and Iurie Beschier. Paid a \$250 civil penalty for a Craigslist advertisement that failed to disclose VADLR or the dealership name and the advertisement was listed under the owner category, and failed to disclose the processing fee.

Bahia Auto Sales and Rubia Santos Giron. Paid a \$1,000 civil penalty for the Dealer advertising under the owner category on Craigslist. Also, failed to disclose dealership name/VADLR.

Royal Pike Motors, and Shadi Madain. Paid a \$250 civil penalty for Dealer advertising under the owner category on Craigslist, and failed to disclose the processing fee.

Cont'd on pg. 8

Board Actions

Legacy Auto Group, LLC and Norma Patricia Mejia. Paid a \$250 civil penalty for Dealer advertising under the owner category on Craigslist, and failure to disclose the processing fee.

International Trading Corp of Virginia and Rakel I Aevarsdottir-McGee. Paid a \$1,000 civil penalty for Dealer advertising under the owner category on Craigslist.

Dave's Auto LLC and David Furlong. Paid a \$250 civil penalty for Dealer advertising under the owner category on Craigslist.

H & M Auto Group and Mustafa Jawadi. Failed to pay a \$250 civil penalty for Dealer advertising under the owner category on Craigslist, and failure to disclose the processing fee. Unpaid civil penalty was moved to Debt set-off program.

For prior issues of Dealer Talk click HERE

Salesperson Material Misstatement

3. APPLICANT CERTIFICAT	ION - CONSENT FOR CRIMINAL HISTORY	CHECK	
Virginia Code § 46.2-1575 lists specific circumstances under v denied. Specifically, your application for a license may be deni	·		icense may b
Any criminal offense classified as a felony.	· Larceny of a vehicle or receipt or sale of a	stolen vehicle	
Any criminal act involving the business of selling vehicles.	Odometer tampering or any related violation	n	
Any fraudulent act in connection with the business of sellir	ng vehicles or any consumer-related fraud.		
Each application will be reviewed carefully and consideration voffenses, submit with your application, documentation and/or v	,	,	of the listed
Note: You should include attested copies of your convictions a	and if you have been released from probation/parole	, evidence of this fact	
A. Have you ever been refused a motor vehicle dealer's or sales	sperson's license or had such license suspended or revi	oked? YES	□NO
B. Have you ever been convicted of a felony?*		YES	NO
C. Have you ever been convicted of any fraudulent or criminal a	ct involving the business of selling motor vehicles?*	☐ YES	NO
D. Have you ever been convicted of odometer tampering, larcer	y of a vehicle or receipt or sale of a stolen vehicle?*	☐ YES	□NO
If the answer to questions B, C, or D is YES, attach a copy of co	nviction record(s), name of probation officer, date(s), ar	d court jurisdiction(s).	
I understand that untruthful or misleading answers are cause for d statement and any violation may be prosecuted to the full extent o for the purpose of evaluating my application.			
l certify and affirm that all the information presented in this form is understand that knowingly making a false statement or representa		n under penalty of perju	ıry and I
APPLICANT NAME (print)	APPLICANT SIGNATURE	DATE (mm/d	d/yyyy)

security number, be collected for debt set off collection purposes.

Pictured to the left is Part 3 of the MVDB 61 Salesperson Application Form. Please remind all applicants for a salesperson's license – initial, renewal, or transfer – to **read each** question carefully. The application asks if the applicant has ever been convicted of a felony. We have received a number of applications where the applicant has checked "NO" for this question, when in fact they have a felony conviction. The convictions are discovered when we run a criminal history check on the applicant. Making a material misstatement on an application will result in denial or suspension of a license. Please note that a disclosed felony conviction may not deny you a license, but if you have a felony conviction and you check "no"— that misstatement will cause denial of a salesperson license. If you would like more information on salesperson licensing criteria regarding criminal history, please click HERE.

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 <u>VIADA</u>. 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

October 8-9	Lord Fairfax Community College – Fauquier Campus, Warrenton (6480 College St, Warrenton, VA 20187)
October 22-23	New River Community College – Christiansburg (782 New River Rd, Christiansburg, VA 24073)
INovember 5-6	Comfort Suites Manassas Battlefield Park, Manassas (7350 Williamson Blvd, Manassas, VA 20109)
November 19-20	Germanna Community College, Fredericksburg (10000 Germanna Point Dr, Fredericksburg, VA 22408)
December 10-11	Reynolds Community College, Henrico (1651 E. Parham Rd, Henrico, VA 23228)



Please click <u>HERE</u> or on the graphic on the left to view our newest efforts for Dealership Education----videos!

Our first two videos are available now with more to be uploaded on an ongoing basis. These first two videos are about Advertising compliance, but 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 <u>MVDB CHANNEL</u>! Stay informed and receive notifications when new videos are released.

MOTOR VEHICLE DEALER BOARD

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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.

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What's Wrong With This Picture?

§ 46.2-1550 states in part that: It shall be unlawful for any dealer to cause or permit dealer's license plates to be used on Courtesy vehicles.

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