



UNDERSTANDING FTC ENFORCEMENT & NY AG COMPLIANCE RISKS

Thursday, April 16, 2026



Sales Tax Seminar

**Center for Automotive Education
& Training**

Tuesday, May 12, 2026:

• 9:30 AM - 12:00 PM

Learn How to Handle Sales Tax

Sales tax issues can be complicated and confusing and may lead to costly errors. This seminar will cover the most common sales tax questions received by GNYADA.

Visit
www.gnyada.com/events
to register





GNYADA and ComplyAuto Present: Navigating New York AG and FTC Focus on Vehicle Pricing

April 16, 2026

Presenter

Brad Miller

Co-CEO and Chief Legal Officer

16+ years at NADA - Chief
Regulatory Counsel



Legal Disclaimer and Notice

This presentation is not legal advice. It is intended to be used solely as a compliance aid. Reasonable efforts have been made to ensure the accuracy and completeness of the following subject matter. No express or implied warranty is provided respecting the information contained in this presentation. **The following material should not be construed as (nor used as a substitute for) legal advice.** If legal advice is required, the services of a competent professional should be sought. Each dealer must rely on its own expertise and knowledge of law when using the material provided.

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By Dealers. For Dealers.

#1 Recommended compliance solution

10,000+ Active dealers across all 50 states

44/50 State dealer association

endorsements

200+ Years of combined experience
in the automotive industry

Many staff are former dealership
employees and even more have
worked in the automotive industry



Agenda

- Federal Advertising Issues
 - Enforcement Update
 - **UPDATE**: Recent FTC letters to 97 dealer groups nationwide
 - Advertising Pricing Examples
- Guardian
- Q&A

Federal Advertising: Recent Activity and Background

Federal Advertising

FTC - primary enforcer

- Primary source of authority - Section 5 of the FTC Act
 - Unfair or deceptive acts or practices
- Other federal statutory requirements
 - TILA/Reg Z
 - CLA/Reg M

Various Guides and Rules

- FTC Cars Rule - **voided**
- FTC Junk Fees Rule
 - In effect, but not applicable to dealers....



FTC CARS Rule - History

- CARS Rule (Vehicle Shopping Rule) - various dealer advertising and F&I practices
 - Originally set to become effective July 30, 2024
 - ComplyAuto drafted the NADA Driven Guide
- NADA/TADA sued the FTC “Petition for Review”
 - January 27, 2025 - 5th Circuit vacates the CARS Rule
 - Court holds that FTC failed to meet its own procedural requirements
- The FTC has consistently asserted that CARS Rule - nothing new
 - That all the requirements were prohibited (or required) under existing authority
- Notably - the court did NOT
 - Overturn or opine on the requirements of the Rule itself
 - Invalidate in any way the current law or enforcement activity

Driven



NADA

FTC Junk Fees Rule - of “Fees Rule”

- “Rule on Unfair or Deceptive Fees”

- 16 C.F.R. Part 464
- Effective May 12, 2025

- Applies only to

- lodging/ticket sales
- **not** dealers

- FTC “FAQ” document

- Contains useful guidance on what is best practice generally
- “Clear and conspicuous”
- dynamic pricing
- etc.



The screenshot shows the FTC website page for the Rule on Unfair or Deceptive Fees. The page header includes the FTC logo and navigation links for Enforcement, Policy, Advice and Guidance, News and Events, and About the FTC. The main heading is "The Rule on Unfair or Deceptive Fees: Frequently Asked Questions". Below the heading, there are tags for "Advertising and Marketing", "Online Advertising and Marketing", and "Advertising and Marketing Basics". A "Table of Contents" section is visible, listing "Introduction" and "What businesses are covered by the Rule?".

Recent FTC “Junk Fee” Enforcement Actions

- Greystar - Dec. 2025 - \$24 million
 - Apartment rentals, undisclosed fees
- Instacart - Dec. 2025 - \$60 million
 - Subscription fees
- Express Scripts - Feb 2026
- Uber - Lawsuit - To recover hundreds of millions in fees
- StubHub - \$10 Million in refunds - first under “Fee Rule”



Enforcement Update

Recent Federal/State Advertising Enforcement Actions

FTC - 4/2022 - penalty \$10M

[Add-ons, discriminatory practices](#)

RI AG - 3/2023 - penalty \$30,000

[Deceptive sales and advertising practices, add-ons](#)

FTC - 5/2023 - penalty \$3.3M

[Add-ons, discriminatory practices](#)

PA AG - 6/2023 - penalty not specified

[Fraud, failure to provide paperwork](#)

RI AG - 7/23 - penalty \$557,815

[Deceptive sales and adv. practices, add-ons](#)

PA AG - 8/10/2023 - penalty not specified

[Fraud, failure to provide paperwork](#)

AK AG - 8/2023 - \$25K/ violation

[Deceptive sales and advertising practices](#)

FTC + WI AG - 11/2023 - \$1.1M

[Add-ons, discriminatory practices](#)

PA AG - 11/2023 - penalty not specified

[Fraud, failure to provide paperwork](#)

FTC + CT AG - 1/2024 - rescission and damages sought

[Deceptive sales and advertising practices](#)

OH AG - 2/2024 - Not specified

[Deceptive sales & adv. practices, titling issues](#)

AZ AG - 3/2024 - penalty \$60,000

[Deceptive sales & advertising practices](#)

NY AG - 3/2024 - penalty \$1.9M

[Deceptive sales & advertising practices](#)

MN AG - 4/2024 - penalty not specified

[Deceptive sales & advertising practices](#)

CT AG - 5/2024 - penalty not specified

[Deceptive sales and adv. practices, add-ons](#)

IN AG - 7/17/2024 - penalty \$500,000

[Deceptive sales & advertising practices](#)

FTC - 7/2024 - Nat'l Used Car Dlr - \$1M+

[Deceptive sales and advertising practice s](#)

MD AG - 8/2024 - \$10K/ car

[Deceptive sales & advertising practices](#)

KS AG - 8/2024 - penalty \$159,000

[Deceptive sales & adv. practices, titling issues](#)

RI AG - 8/2024 - penalty \$1M

[Deceptive sales and adv. practices, add-ons](#)

FTC - 8/2024 - Admin Complaint

[Deceptive sales and adv. practices, add-ons](#)

FTC + AZ AG - 8/2024 - penalty \$2.6M

[Deceptive sales & advertising practices, discriminatory practices, junk fees](#)

FTC + MD AG - 12/2024 - \$10K/ violation

[Deceptive sales and advertising practices](#)

FTC + IL AG - 12/2024 - \$19.8M

[Deceptive sales and advertising practices](#)

AK AG - 12/2024 - penalty \$300,000

[Fees not included in advertised price](#)

AK AG - 1/2025 - penalty not specified

[Doc fees not in online advertised price](#)

CT AG - 1/2025 - penalty \$1.5M

[Various deceptive titling practices](#)

IN AG - 3/2025 - penalty not specified

[Various forms of deceptive practices](#)

MD AG - 3/2025 - \$3M penalty + refunds

[Sales commission fees and undisclosed markups and add-on-products](#)

NY AG - 5/2025 - penalty \$3.2M

[Overcharging for lease buyouts](#)

FTC - 3/2026 - Warning letters to 97 dealer groups

[Deceptive pricing](#)

FTC + MD AG - 4/2026 - \$3.1M penalty + \$75M restitution

[Deceptive pricing, unauthorized add-ons](#)

NY AG Activity

- NY AG has been active in this area in recent years

- E.g.

- NY AG - 3/2024 - penalty \$1.9M
 - [Deceptive sales & advertising practices](#)
- NY AG - 5/2025 - penalty \$3.2M
 - [Overcharging for lease buyouts](#)



FTC and State Enforcement Actions

- In virtually every one of these actions - alleged violations include:
 - Reg Z/ Reg M “Trigger” Term Violations
 - Price Advertising Issues
 - Product Sales practices
 - Payment Packing Allegations

NOTE: Personal Liability - Becoming Standard

Personal Liability Is Real: Joint State and Federal Enforcement Action in Connecticut Sends a Clear Warning to Dealers

By Mark Sanborn, Senior Product and Regulatory Counsel / October 1, 2025



Background of the Case

Federal and state regulators recently brought an enforcement action against a Connecticut dealership and several of its employees that should serve as a cautionary tale for dealerships nationwide. The Federal Trade Commission (FTC) and the Connecticut Attorney General alleged a pattern of deceptive practices that included inflating prices with undisclosed add-ons, charging questionable certification or inspection fees, and misrepresenting government registration costs. The action did not stop at the dealership entity; it also

- Generally will bring claims against the dealership as well as individual owners and managers
- In one CT case (related to advertising and F&I violations) claims brought against individual principals, sales managers, a general manager, and a finance manager.
- As of September 2025, two former sales managers agreed to settlements, while litigation continues against the dealership and several other individuals.
- Been consistently asserted in recent actions

The FTC's Recent Warning to Dealers on Price Advertising

FTC Warning to Dealers - March 13, 2026



FEDERAL TRADE COMMISSION
PROTECTING AMERICA'S CONSUMERS

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For Release

FTC Warns 97 Auto Dealership Groups About Deceptive Pricing Letters stress the need for truthful and transparent pricing in the automotive industry

March 13, 2026 | [f](#) [x](#) [in](#)

Tags: [Consumer Protection](#) | [Bureau of Consumer Protection](#) | [deceptive/misleading conduct](#) | [Automobiles](#) | [Advertising and Marketing](#)

The Federal Trade Commission is [sending letters](#) to 97 auto groups nationwide, warning them that the prices they advertise must be the total price—including all mandatory fees—that consumers will be required to pay.

The letters encourage dealers to review their advertising and pricing practices, including ensuring advertised prices include all fees consumers will be required to pay when buying a vehicle. At a minimum, this includes evaluating advertised prices to ensure they match actual prices charged to consumers. The FTC will continue to monitor the marketplace, the letters state, and will take additional action as warranted to ensure compliance with the FTC Act and other rules the

[Warning Letters](#)

[Related Warning Letters](#)

[Topics](#)

[Protecting Consumers](#)

[The Auto Marketplace](#)

What Happened?

- FTC sent warning letters to 97 dealer groups nationwide
 - Recipients not public
- Issued an accompanying Press Release noting continuing action against dealers nationwide
- “The FTC will continue to monitor the marketplace,...and will take additional action as warranted to ensure compliance with the FTC Act and other rules the Commission enforces”
- Primary Takeaway - Price Advertising
 - Advertised prices must represent the total price, including all mandatory fees, that consumers will be required to pay

FTC Issues Massive Warning to Dealers About Price Advertising

By Brad Miller, Co-CEO & Chief Legal Officer / March 13, 2026



Key Takeaway

The FTC has sent warning letters to 97 auto dealership groups nationwide, expressing “concern” that all these dealers are violating the law, and putting the entire industry on notice that advertised vehicle prices must reflect the true, all-in price consumers will actually pay—including all mandatory fees. Dealers should act immediately to audit their advertising and pricing practices.

As Strong a Signal as the FTC Can Send - To All Dealers

“The Trump-Vance FTC is committed to preventing auto dealers from misleading consumers with low advertised prices and then adding on mandatory fees at the end of the purchasing process,” said Christopher Mufarrige, Director of the FTC’s Bureau of Consumer Protection.

“The FTC will remain focused on monitoring auto dealerships to ensure that the market functions efficiently and competitors are transparently competing on price.”

FTC Claims:

- Protecting Consumers from “hidden fees:
- Protect “good actors” in the competitive marketplace



Christopher Mufarrige

But I Thought This Was a “Deregulatory” Administration?

It is....but, that does NOT mean dealers shouldn't expect enforcement activity. In fact it is as active as it has ever been.

Remember - four different levels/analyses to determine the enforcement environment:

1. Federal

- a. Willingness to regulate - by issuing new rules/ new guidance
- b. Willingness to enforce existing rules

2. State


- a. Willingness to regulate - by issuing new rules/ new guidance
- b. Willingness to enforce existing rules

New federal rules may be less likely, but not federal enforcement.

We have seen tremendous uptick in state activity in both “red” and “blue” states

What Do the FTC Letters Require?

- All advertised prices include every fee consumers will be required to pay to purchase a vehicle;
- Advertised prices match the actual prices charged to consumers at the point of sale; and
- No mandatory fees, add-ons, or financing conditions are concealed until the consumer reaches the final stages of purchase.



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Consumer Protection

[DATE]
Via Federal Express
[NAME]
[ADDRESS]

Re: Deceptive Pricing

WARNING LETTER

Dear [NAME]:

This letter is to advise you that you may be advertising prices for cars that are lower than what you actually charge consumers. Such deceptive tactics harm not only consumers, but competition, by making it hard for law-abiding businesses to compete on an even playing field.

One of the FTC's enforcement priorities is ensuring that advertised pricing is transparent and truthful. When consumers do not know the true price of a car—or any product—consumers and others suffer related consequences, including that consumers cannot comparison-shop and make informed decisions, sellers trying to deal honestly with consumers are put at a competitive disadvantage, and the market cannot operate efficiently. This is why the FTC has focused on promoting price transparency across multiple markets, including rental housing,¹ ticketing and hotels,² grocery delivery services,³ and auto sales and leasing.⁴ The FTC is committed to ensuring that the price consumers see in advertising is the actual price they will pay (aside from required government charges, like taxes). This is what the FTC Act, which prohibits deceptive or unfair acts or practices, requires.

Examples of illegal pricing practices include:

- advertising a price that does not reflect all required fees,
- advertising a price that reflects rebates or discounts not available to all consumers,

¹ E.g., *Complaint, FTC v. Creststar Real Estate Partners*, No. 1:25-cv-00165 (D. Colo. Jan. 16, 2025).
² E.g., *Complaint, FTC v. Live Nation Entertainment*, No. 2:25-cv-8884 (C.D. Cal. Sept. 18, 2025), *see also* Trade Regulation Rule on Unfair or Deceptive Fees, 16 CFR Part 464 (effective May 5, 2025).
³ E.g., *Complaint, FTC v. Instacart*, No. 3:25-cv-10793 (S.D. Cal. Dec. 18, 2025).
⁴ E.g., *Complaint, FTC v. Lindsay Chevrolet*, No. 1:24-cv-02362 (E.D. Va. Dec. 27, 2024) (alleging dealerships advertised prices they refuse to honor and falsely claimed consumers were required to obtain financing through the dealership); *Complaint, FTC v. Lender Automotive Grp.*, No. 1:24-cv-13947 (D.D. Ill. Dec. 15, 2024) (alleging dealerships deceived consumers about the price and availability of vehicles, including by requiring consumers to pay additional fees for pre-installed products or charging consumers for those products without their knowledge); *Complaint, Subaru Auto Grp., Inc.*, No. D-9436 (F.T.C. Aug. 16, 2024) (alleging dealerships inflated prices by adding hidden charges and requiring that consumers buy additional items).

Sincerely,

Christopher Mufarrige
Director
Bureau of Consumer Protection
Federal Trade Commission

take into account the amount of an additional required fee on consumers using dealer financing. Additional items not reflected in the advertised price, and existent vehicles.

may be engaging in one or more of these practices. Our practices, including by making sure the prices you charges aside from required government charges, to laws. This would include, at a minimum, evaluating and confirming they match.

comprehensive statement of concerns that may exist. Nor is it intended to represent any conclusions on whether you are engaging in these practices. It is your company's responsibility to ensure compliance with the provisions of federal law, including Section 5 of the FTC Act. We will continue to monitor the marketplace. Additionally, please note that I am not a dealer.

This letter is available on the Commission's website at www.ftc.gov and other important resources designed to ensure that consumers are aware of their rights under the FTC Act and other laws and rules enforced by the Commission.

“Illegal” Pricing Practices Cited by the FTC

1. Advertising a price that does not reflect all required fees;
2. Advertising a price that reflects rebates or discounts not available to all consumers;
3. Advertising a price that fails to account for an additional required down payment;
4. Conditioning the advertised price on the consumer using dealer financing;
5. Requiring consumers to purchase additional items not reflected in the advertised price; and
6. Advertising unavailable or non-existent vehicles.

NOTE: These are listed as “examples” not an exhaustive list.

1. Advertising a Price That Does Not Reflect All Required Fees

- Doc fees - but not just doc fees
 - Destination charges - new vehicles
 - “Service fees”/“processing charge”/“dealer fees”/ “filing fees”/“costs of closing”/“finance charges”/“bank fees”
 - Must be disclosed in the price - regardless of the description
- Only “Required” Fees
 - Required means required by the dealer
 - If required by the state, generally can exclude (taxes, title and reg, etc.)
 - What if your doc fee is negotiable - is it required?
 - Optional fees presumably would be tied to optional product or service
 - Could create other issues in some states....

2. Advertising a Price That Reflects Rebates or Discounts Not Available to All Consumers

- Arguably a change in existing federal law
 - Previous FTC actions generally applied the “typical” consumer (or similar) standard
- This is consistent with the FTC Cars Rule which prohibited rebates from being “factored” into the price unless applicable to ALL consumers
- But you can list any rebates or discounts - even limited offers...
 - ...” as long as such representation is truthful, and any limitations are clear and conspicuous to consumers...” (CARS Rule)
 - CANNOT “net” them out of the price unless available to EVERYONE
- Note that this applies to rebates and discounts
 - Never 100% clear the difference, but more than just third party rebates
 - Dealer discounts
 - Trade-in allowances, etc.

3. Advertising a Price That Fails to Account for an Additional Required Down Payment

- Cannot bury a required down payment in the fine print
- Same for any other required consideration like trade
 - Guaranteed Trade-in Allowance
 - Problematic for a number of reasons

4. Conditioning the Advertised Price on A Consumer Using Dealer Financing

- Like a dealer rebate in practice
- Again, presumably you could note that a rebate or discount is available, but because it is conditional (not available to everyone), cannot be netted out (or “factored into”) the advertised price

5. Requiring Consumers to Purchase Additional Items Not Reflected in the Advertised Price

- Any “mandatory” or hard adds must be included in the advertised price
 - Theft deterrent
 - inventory tracking hardware
 - Window tint / Door edge guards
 - Lift kits
 - Tire and Wheel mods
 - superchargers
- Clearly related to hard adds and F&I product practices - at issue in almost all recent state and federal enforcement actions
- If a consumer must purchase the item (or service) to purchase the vehicle, it must be in the advertised price.
 - What about subscriptions that come with the item?

5. (cont) What “Add-Ons” Must be in the Advertised Price

If the Add-on is require, it must be included in the Offering Price. Dealers might consider factors like:

1. Service vs. Tangible Good: Services contracts are more likely to be optional, unlike pre-installed accessories. GAP agreements and service contracts are typically optional Add-ons.
2. Prior Practice of Removal: If a dealer commonly removes or disables an Add-on at a customer's request, it is likely "optional." For example, theft deterrents or protection devices that it removes at their request without objection.
3. Ability to Remove: Add-ons that are difficult or impossible to remove without causing damage or substantial effort are usually "mandatory." Pre-installed window tint or lift kits might be good examples. The FTC also recognizes dealer- customized vehicles with pre-installed accessories in this category.
4. State Law: Some states, like California, legally categorize certain products as "optional." This often includes theft deterrent devices, surface protection products, maintenance and service contracts, insurance products, and GAP agreements.

5. (cont.) What Should You Do To Address This Issue?

- Ensure all fees and product costs are clearly disclosed, not hidden in fine print
- Train staff to avoid payment packing and properly explain product features, costs, and optional nature to customers
- Implement robust compliance tools and systems to monitor and enforce best practices
- Ensure you are documenting what is required under your state law
 - And auditing (at the least) your deal jackets to ensure compliance
- No contrary statements by salespeople
 - Implying that its required for financing

6. Advertising unavailable or non-existent vehicles.

- Scope of this is unclear - but primarily aimed at preventing “phantom” loss leader ads
- Not necessarily related to price
 - FTC focused on “inconvenience” of going to the dealership for a vehicle that is not there
 - If it’s advertised it should be there
- What about “in transit” vehicles?
 - No indication that it is impermissible to advertise in transit vehicles
 - However, at the least, status must be clearly disclosed in any advertisement
- Ensure it is clear, conspicuous, and easily accessible to consumers. Avoid placing the “in-transit” disclosure in footnotes, hover-over text, or other methods that may be easily overlooked or require additional action from the consumer to view. I
- Prominently display the “in-transit” status in close proximity to the vehicle information, using a font size and color that is easily readable and distinguishable from the surrounding text.
- Don’t just say “vehicles may not be available” or “check for availability”

What About My State Law Governing Doc Fees?

State (+DC) Doc Fee Laws vary:


- 18 states require the doc fee in the advertised price
- 17 states allow exclusion with conditions
 - Likely need to disclose other than in the advertised price
- 3 states require disclosure in advertisement (not necessarily in the price)
- 3 states prohibit inclusion in the price
 - Must be disclosed separately
- 10 have no specific advertising or disclosure requirements

What Does This Mean re Doc Fee Disclosure?

- In New York (and in 16 other states):
 - Your state law requires the doc fee to be included in the advertised vehicle price. Only government charges (taxes, title, registration, license) may be excluded. State law and FTC guidance are aligned in these states.

Advertising Pricing Examples

Example: Total Price & Fee Disclosure




2025 Toyota RAV4 XLE
\$32,995*

Exterior: Magnetic Gray Metallic
Interior: Black Softex
Engine: 2.5L 4-Cyl
Transmission: 8-Speed Auto
Drivetrain: AWD
MPG: 28 City / 35 Hwy
Stock #: T25-1847
VIN: 2T3P1RFVSSC039124

[Get Today's Price](#)
[Schedule Test Drive](#)

Description
The 2025 Toyota RAV4 XLE AWD in Magnetic Gray Metallic preinites is 17-inch alloys and lers LED headlights at that lxl modurnt goals that hve that come RAV4 XLE to the active dealership lot.

*Price excludes \$799 documentation fee, tax, title, license, and registration fees. All prices subject to change. See dealer for details. Vehicle subject to prior sale. Offer details may vary. MPG ratings are estimates.



2025 Toyota RAV4 XLE
\$33,794 All-In Price

✓ Includes all dealer fees. Price excludes tax, title & registration.

Exterior: Magnetic Gray Metallic ·
Interior: Black Softex · **Engine:** 2.5L 4-Cyl · **Transmission:** 8-Speed Auto
Drivetrain: AWD
MPG: 28 City / 35 Hwy
Stock #: T25-1847

[Call for details](#)

Non-Compliant - Hidden Doc Fee:
Price Excludes Mandatory Dealer Fee

Compliant - All-In Pricing: Doc Fee
Included in Advertised Price

Example: Rebates & Conditional Pricing

2025 Silverado 1500 LT – Only \$41,500!*

MSRP \$52,500
Costco Member Offer –\$1,000
GM Loyalty Rebate –\$1,500
Conquest Cash –\$1,000
Trade-In Assistance –\$3,500
Dealer Discount –\$4,000



Patriot
CHEVROLET

Shop Now

*Price reflects all available incentives. Not all customers will qualify. Must provide proof of eligibility. See dealer for details.

Non-Compliant - Limited Rebates
Baked Into Price

2025 Silverado 1500 LT – \$48,500*

Our Price – Available to All Buyers. Includes all dealer fees.

You May Also Qualify For Additional Savings:

- ① Active Military: –\$1,000 (valid military ID required) · ① First Responder: –\$750 (badge/certification required) ·
- ① Costco Members: –\$1,000 (active membership required) · ① Current GM Owner: –\$1,500 (must own 2015+ GM vehicle) ·
- ① Conquest: –\$1,000 (must trade non-GM vehicle).



Patriot
CHEVROLET

View Details

*Excludes government fees and taxes

Compliant - Rebates Listed
Separately with Clear Conditions

Example: Conditional Pricing & Mandatory Add Ons

**New 2025 Accord Sport —
\$28,995!** Finance & Save!

Up to \$1,500 in Finance Savings!

[Get Pre-Approved](#)




**Heritage
Honda**

*Price includes \$1,500 Honda Finance Bonus. Must finance through dealer at standard rates. Cannot be combined with special APR offers. Cash price: \$30,495.

Non-Compliant - Price Conditioned on Dealer Financing

SUNRISE KIA

NEW INVENTORY USED INVENTORY FINANCING SERVICE & PARTS ABOUT US CONTACT



\$42,995

NEW 2025 KIA TELLURIDE SX
IN EBONY BLACK | STOCK #SK4501 | VIN: KNDA...

[CHECK AVAILABILITY](#)
[GET INTERNET PRICE](#)
[SCHEDULE TEST DRIVE](#)

VEHICLE DETAILS


Dealer Installed Accessories:
ProTech Window Tint — \$495 · LoJack Theft Recovery — \$995 · All-Weather Floor Liners — \$350 · Door Edge Guards — \$195 · Illuminated Running Boards — \$695.

Installed accessories not included in advertised price. See dealer for total.

Non-Compliant - Mandatory Add-Ons Excluded from Price

Example: Vehicle Availability & Deceptive Claims

INTERNET SPECIAL!



MSRP
\$34,499
\$27,499
Save \$7,000!

Stock #: FB2025-0013 · VIN: 1FMCU9G6...
★ **DEALER'S CHOICE PICK!**

[GET TODAY'S PRICE](#)

[REQUEST INFORMATION](#)


Chat with Freedom Ford Online Now [Start Chat](#)

[CHECK AVAILABILITY](#)

2025 Ford Bronco Sport Big Bend
Area 51 Blue | New · AWD · 1.5L EcoBoost® | 12 miles

Vehicle pictured may not represent actual vehicle. All vehicles subject to prior sale. Price valid for in-stock units only — contact dealer to verify availability. © 2024 Freedom Ford.

2025 Ford Bronco Sport Big Bend Area 51 Blue



\$34,499 MSRP

Status: **In Transit** — Estimated Arrival: **April 22, 2026**

[Reserve This Vehicle Deposit](#)

This vehicle is currently being shipped to our dealership. A \$500 fully refundable deposit will secure this vehicle upon arrival.

VEHICLE INFORMATION

Stock #: FR250123
VIN: 1FMCU9GX... (last 6: 123456)
Engine: 1.5L EcoBoost
Transmission: 8-Speed Automatic

VEHICLE HIGHLIGHTS

- Advanced 4x4
- G.O.A.T. Modes
- Terrain Management System
- Ford Co-Pilot360 Assist+
- Ban & Olufsen Sound System

PACKAGES & OPTIONS

- Convenience Package
- Tech Package
- Ford Package
- Ford Citiioate Sound System

PAYMENT CALCULATOR

Estimate

Percent Value:

TRADE-IN VALUE

[Trade-In Value](#)

Non-Compliant - Phantom Vehicle:
Advertising Unavailable Inventory

Compliant - In-Transit Vehicle with
Clear Status Disclosure

What Should Dealers Do Now?

Best Practices

- Advertise “out the door” prices or clearly state exclusions.
 - Ensure the total price a customer will pay is reflected in the advertised price
 - Doesn’t need to be a floor, but should be a ceiling
 - Disclose all conditions in plain language, next to the offer.
- Establish an advertising review process
 - Review your website, third-party listings, and social ads regularly.
 - Train sales and BDC teams on ad compliance basics.
- Consider a reasonable consumer. What would they think?
- Avoid using terms like “always” and “everyone”
- Is the vehicle advertised available on the lot?
- Maintain records to prove advertised price = actual price

Ads and F&I Bottom Line

- Dealers should be prepared for *more* enforcement - at the federal and state levels
 - Advertising - primarily price advertising
 - F&I practices
- Given the increased scrutiny of dealer practices, dealers should:
 - Maintain vigilant oversight of price advertising
 - Ensure all fees and product costs are clearly disclosed, not hidden in fine print
 - Train staff to avoid payment packing and properly explain product features, costs, and optional nature to customers
 - Implement robust compliance tools and systems to monitor and enforce best practices
 - Ensure you are documenting what is required under your state law
 - And auditing (at the least) your deal jackets to ensure compliance

What Steps Can You Take?

- 1. Contact ComplyAuto and see how our Guardian product can help.** Guardian utilizes AI to ensure that all your ads are scanned and reviewed for compliance with federal law as well as all 50-state advertising laws. It is the only tool of its kind, and the most powerful defense that dealers have to protect against advertising claims.
- 2. Conduct a comprehensive audit of all current advertising** to confirm that advertised prices reflect all mandatory fees and charges (Guardian can help);
- 3. Review any price promotions, rebates, or discount programs** to ensure
 - a. Only part of the advertised price if available to all consumers - break out and explain
 - b. For all limited rebates - all eligibility conditions are clearly and conspicuously disclosed;
- 4. Examine financing-contingent pricing** to confirm compliance with applicable disclosure requirements;
- 5. Review add-on product practices** to ensure no mandatory products are excluded from advertised prices, and;
- 6. Train sales and finance staff** on compliant pricing disclosure practices.

ComplyAuto Guardian



Eliminate your **biggest compliance exposures** with the industry's most comprehensive sales and F&I compliance platform.

Guardian monitors your website, inventory, and advertisements to **catch state and federal violations before regulators do.**

24/7

Automated Monitoring

50-State

Compliance Coverage

100+

Inspection Points

Advertising Compliance

Automated review for graphic ads and website scans for 50-state legal compliance

Inventory Compliance

Automated tools for recall management, vehicle privacy, and FTC Buyers Guide creation

F&I Compliance

Deal jacket audits, training, and policy management

Comprehensive Compliance

We monitor your website, inventory, and advertisements 24/7/365 to catch state and federal violations before regulators do

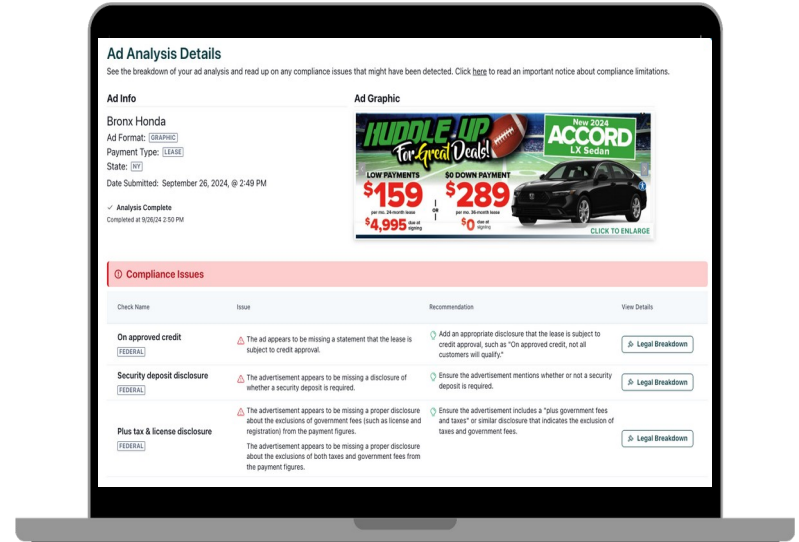
GUARDIAN The Other One

Deal Jacket Audits	✓	✓
AI-Powered Website Compliance Scanning	✓	✗
AI-Powered Advertising Compliance	✓	✗
Inventory Compliance	✓	✗
AI-Powered Ad Creation	✓	✗
Record Retention Tool	✓	✗
AI-powered Trend Dashboard	✓	✓
Policies & Procedures	✓	✓
Employee Training	✓	✗

Schedule a Guardian Demo

See it in action!

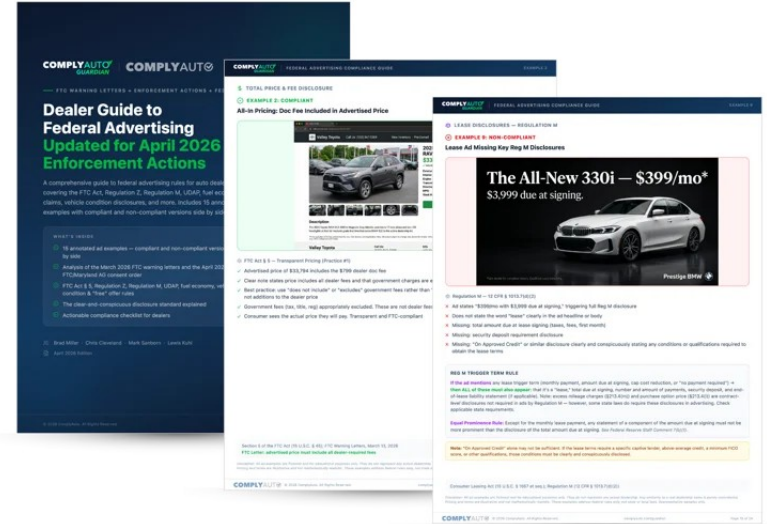
- Website & VDP Scanning
- Ad Analyzer and Ad Generator
- Policy Builder
- F&I Training
- Enterprise Dashboard
- And more



Scan the QR Code to schedule a demo or visit:
<https://complyauto.com/schedule-demo>

Download the ComplyAuto Dealer Guide to Federal Advertising

- Updated to ensure compliance with standard set forth in the FTC's recent enforcement actions and warning letters to over 97 auto groups.
- Covers the FTC Act, Regulation Z, Regulation M, UDAP, fuel economy claims, vehicle condition disclosures, and more.
- Includes 15 annotated ad examples with compliant and non-compliant versions side by side.



Scan the QR Code to download the guide or visit:
<https://share.hsforms.com/2F6o3ntKSRmaCf5EXAafBGwd8yh>

Questions?

COMPLYAUTO 

By Dealers. For Dealers.

We're here to help! Questions?

Brad Miller

Co-CEO/Chief Legal Officer

brad.miller@complyauto.com



Schedule a demo

**10,000+ active
dealers across
all 50 states**

**44/50 state
dealer
association
endorsements**



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