



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2018-469A

Roy K. Dockum, Executive Director  
Oklahoma Motor Vehicle Commission  
4334 N.W. Expressway, Suite 183  
Oklahoma City, OK 73116

December 4, 2018

Dear Executive Director Dockum:

This office has received your request for a written Attorney General Opinion regarding actions that the Oklahoma Motor Vehicle Commission intends to take pursuant to a consent agreement with multiple licensees. Each licensee employed an unlicensed salesperson. The details of each violation are attached on Appendix A. The Board proposes to fine each licensee \$250 per unlicensed salesperson.

Oklahoma law authorizes the Oklahoma Motor Vehicle Commission to “impose a fine not to exceed One Thousand Dollars . . . against a dealer per occurrence” for several reasons, including “employ[ing] unlicensed salespersons . . . or other unlicensed persons in connection with the sale of new motor vehicles.” 47 O.S.Supp.2017, § 565(A), (A)(7)(d). The Board may reasonably believe that the proposed action is necessary to deter future violations.

It is, therefore, the official opinion of the Attorney General that the Oklahoma Motor Vehicle Commission has adequate support for the conclusion that these actions advance the State’s policy to require licensure of new motor vehicle salespersons.

Handwritten signature of Mike Hunter in black ink.

MIKE HUNTER  
ATTORNEY GENERAL OF OKLAHOMA

Handwritten signature of Amanda Otis in black ink.

AMANDA OTIS  
ASSISTANT ATTORNEY GENERAL

## Appendix A

Dealership Name	License No.	Total Fine (\$250 per unlicensed salesperson)
Classic Chevrolet – Owasso	159	\$750
David Stanley Ford – Midwest City	819	\$750
Dunn Country Motors - Eufala	186	\$500
Edmond Hyundai - OKC	465	\$500
Hoyte CJDR – Durant	788	\$500
Regional Hyundai – Broken Arrow	625	\$500
Automax Hyundai – Del City	88	\$250
Ada Nissan	331	\$250
Bartlesville DCJR	818	\$250
Billingsley Ford – Lawton	302	\$250
Byford DCJR – Duncan	752	\$250
David Stanley CJDR – Midwest City	413	\$250
Doug Gray CJDR – Elk City	219	\$250
Doenges Ford – Bartlesville	308	\$250
Doenges Toyota – Bartlesville	797	\$250
Fenton Honda – Ardmore	39	\$250
Joe Cooper Ford - Yukon	427	\$250
Kevin Grover Buick GMC – Wagoner	181	\$250
Lawton CJDR	618	\$250
Wilmes Chevy Buick GMC - Altus	35	\$250