

FTC Common Ground Conference
Seattle – Nov. 18-19, 2014

All About Autos Panel – Nov. 19, 1:30pm

Typical enforcement actions:

Advertising violations:

- Craigslist – dealers advertising for sale “by owner”
- Phony reference price, “market value”
- Multiple sales prices for the same vehicle in different advertisements
- Offers of credit that are not available

Transactional violations:

- Failing to disclose material defects; “as is”
- Failing to disclose a deferred down payment and negative equity
- Bushing
- Packing

General trends:

- Offering price misrepresentations – cash price, internet price
- “No hassle” misrepresentations
- Motor vehicle buying service websites
- Recalls
- Negative equity
- Dealer franchise model/manufacturer direct sales

Trends affecting particular populations:

- “Cash price”
- No license, no problem
- BHPH churn, repos/theft report
- “As is”, “parts only”