



OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2025-55A

Brian Wilson, Executive Director
Oklahoma Used Motor Vehicle and Parts Commission
421 N.W. 13th, Suite 330
Oklahoma City, Oklahoma 73103

October 30, 2025

Re: Seymour d/b/a Smart Buy Auto Sales, LLC, Case No. UD-25-03

Dear Executive Director Wilson:

This office has received your request for a written Attorney General Opinion regarding the action that the Oklahoma Used Motor Vehicle and Parts Commission (the “Commission”) intends to take in the above-referenced case. Randy Seymour is the sole member of Smart Buy Auto Sales, LLC (collectively the “Respondent”) a licensed motor vehicle dealer doing business as Smart Buy Auto Sales, pursuant to a license issued by the Commission.

Oklahoma law authorizes the Commission to regulate the sale of used motor vehicles and to license used motor vehicle dealers. 47 O.S.Supp.2024, § 582(E). Oklahoma law authorizes the Commission to “impose a fine not to exceed . . . (\$1,000) per occurrence and/or revoke or suspend a license after it has been granted” for willful and/or repeated failure to comply with applicable statutes or any rule promulgated by the Commission. 47 O.S.Supp.2024, §§ 584(A)(3), (5).

Respondent had previously entered into a consent agreement in July 2022 wherein it admitted to committing twenty-six (26) advertising violations and paid a fine of \$2,600 dollars (\$100 for each violation). Respondent was subsequently assessed a fine of \$1,000 dollars in July 2024 for advertising 100% financing approval.

After a hearing on September 9, 2025, the Commission found that Respondent again violated Commission rule OAC 765:16-3-6 which dictates dealer price advertising. Respondent violated OAC § 765:16-3-6(a) fourteen (14) times by listing the down payment as the most conspicuous price or in lieu of the full price of the vehicle and six (6) times by listing the price of the vehicle as \$1234 which was a fictitious price. The Commission also found that Respondent violated OAC § 765:16-3-12 fifty-four (54) times by failing to state the name of the dealership in advertising. The Commission further concluded that Respondent violated 47 O.S.Supp.2024, §§ 584(A)(3), (5) by continually or flagrantly violating the rules of the Commission.

Therefore, the Commission proposed to suspend Respondent's used motor vehicle dealer's license for fifteen (15) days and assess a fine in the amount of \$500 dollars for each violation in this case, for a total of \$30,000 dollars.

It is, therefore, the official opinion of the Attorney General that the Oklahoma Used Motor Vehicle and Parts Commission has adequate support for the conclusion that this action advances the State's policy to protect the public by requiring that used motor vehicle dealers meet minimum licensing requirements.

A handwritten signature in cursive script that reads "Cheryl Dixon".

CHERYL DIXON

Deputy General Counsel