BEFORE THE ADMINISTRATOR OF CONSUMER CREDIT STATE OF OKLAHOMA

STATE OF OKLAHOMA ex rel. DEPARTMENT OF CONSUMER CREDIT) ,))	FILED AUGUST 27, 2025 STATE OF OKLAHOMA DEPARTMENT OF CONSUMER CREDIT
Petitioner)	
V.)	Case No. 25-0041-DIS
TOP NOTCH USED CARS, LLC,)	
Respondent)	

CONSENT ORDER

Petitioner, State of Oklahoma ex rel. Department of Consumer Credit ("Petitioner") and Respondent, Top Notch Used Cars, LLC, ("Respondent") voluntarily enter into this Consent Order as an informal disposition of this individual proceeding to avoid litigation. Respondent agrees to waive its right to a hearing under the Oklahoma Administrative Procedures Act and both parties agree as follows:

- (1) Petitioner restates and incorporates by reference the allegations made by the Petitioner in the Amended Notice of Hearing filed in this matter.
 - i. Respondent is a domestic limited liability company under the jurisdiction of the State of Oklahoma, Oklahoma Secretary of State filing number 3513094007; active filing status.
 - ii. Respondent transacts business at 2415 W. Noble Ave., Guthrie, OK 73044.
 - iii. On April 16, 2025, Consumer Credit Investigators Jimmie Ray and Michael Thompson arrived at Respondent's business location and noticed the front door was locked and had a sign listing a phone number to call. The Investigators called the phone number which rang with no answer. The Investigators waited for roughly 15 minutes, took an exterior photo of Respondent's business, and exited the premises. Respondent's owner called the Investigator's cell phone around 3:15 PM. The Investigators introduced

themselves and explained the reason for their visit was to review executed consumer finance contracts. Respondent's owner advised he was busy and would call the Investigators back later, though they never received a call back. The Investigators called Respondent's number on April 17, 2025, during business hours, and no one answered.

- On April 24, 2025, Petitioner subpoenaed the requested documents from Respondent. On May 12, 2025, the requested documents were delivered to Petitioner. A review of the documents showed that Respondent was initiating credit sales in 2024 and 2025 without a notification license from Petitioner. A reviewed retail finance installment contract and security agreement which was executed on 10/29/2024 lists Respondent as the seller. The agreement had an amount financed of \$4,000 with payments of \$306.91 for 15 months and was assigned to Westlake Financial. A review of Respondent's website shows consumers can complete an application online.
- iv. On May 12, 2025, Petitioner received a Notification License application and filing fee from Respondent. License number 89714 was issued to Respondent on May 13, 2025.
- v. At the time of the investigation, Respondent was not licensed in the State of Oklahoma pursuant to the provisions of 14A O.S. §§ 6-201 through 6-203 of the UCCC. 14A O.S. § 6-203(2).
- vi. Respondent had failed to pay the notification license filing fee for each business location pursuant to OKLA. ADMIN. CODE § 160:5-1-2(2) (A).
- (2) Respondent does not admit to the allegations made by the Petitioner in the Notice of Hearing filed in this matter, and incorporated by reference in this Consent Order, except that Respondent admits the facts necessary to establish the Department's jurisdiction over Respondent and the subject matter of this action.
- (3) Respondent agrees to pay a civil penalty of \$500.00, payable to the Oklahoma Department of Consumer Credit, on or before August 28, 2025.
- (4) The payment shall be made payable by check or money order to the Oklahoma Department of Consumer Credit, shall

Oklahome mer consider the playment is for Case Number 25-0024-DIS and shall be pladressed to the attention of John T. Coyne, Chief Enforcement Counsel, Department of Consumer Credit, 629 NE 28th Street, Oklahoma City, Oklahoma 73105.

- (5) A file stamped copy of this Consent Order will be returned to Respondent upon signature of the Administrator of the Department of Consumer Credit or the Deputy Administrator of the Department Consumer Credit.
- (6) If Respondent fails to comply with the terms of this Consent Order, the Administrator of the Department of Consumer Credit is authorized to file an application to enforce this Consent Order in the District Court of Oklahoma County, Oklahoma in accordance with the provisions of 59 O.S. § 2095.17(c).





Scott Lesher Administrator State of Oklahoma Department of Consumer Credit

Dated: 8/27/25

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Oklahoma Department
of Consumer Credit
AUG WERTFICA

AUG WERIFICATION OF CONSENT ORDER, CASE NUMBER 25-0041-DIS

STATE OF OKLAHOMA

COUNTY OF Logan

Signed and sworn to (or affirmed) before me on $\underline{August 25}$, 2025, by Top Notch Used Cars, LLC.

Top Notch Used Cars, LLC

(Seal, if any)



Notary Public

My commission expires:

2505/80/80