



SALES AUDITING AND LEGAL EDUCATION SUPPORT PROGRAM

The S.A.L.E.S. Program consists of a compliance audit of your sales and finance processes, addressing many of the state and federal laws dealers are currently facing, with an easy-to-understand detailed analysis of the potential risks, if any, in those departments. The first step for a member is the opportunity to participate in a Dealer Policies and Practices Questionnaire *at no cost*. Once the questionnaire is answered, the Association will provide feedback to the membership based on their responses to the questions posed. Dealers can choose from the following menu of individually priced, a la carte S.A.L.E.S. services, for those services that are best suited to a dealer's individual needs:

1) Forms Audit: A detailed legal analysis of the following dealership sales and finance forms:

- Buyers Order
- Lease Order
- Arbitration Agreement
- Conditional/ Spot Delivery Forms
- Demo Drive Agreement
- FTC Buyers Guides (all versions used)
- Customer Trade Appraisal Form
- Pay-Off Authorization
- Lease Payment Form
- Credit Applications
- Privacy Notice
- Menu Screen(s)
- We Owe
- Notice to Co-Signer
- Lemon Law Notice
- Insurance Verification Form
- Addendum or Window Stickers
- Goodwill Agreement
- Rental Agreement

Pricing:	Member	Non-member
	\$400	\$1,000

2) Walk Around Audit: A physical inspection of dealership for compliance with select regulatory issues, including Gramm Leach Bliley Safeguarding provisions, federal motor vehicle labeling and consumer disclosure laws, select state motor vehicle licensing and repairs and services notices, with a detailed report of areas of concern.

Pricing:	Member	Non-member
	\$650	\$1,500

3) Deal Audit: A detailed review of 3-5 customer deal files for areas of risk, with a detailed report indicating areas of legal non-compliance, advice as to forms use, recommended issues for policy enactment, and programming issues to be addressed.

Pricing:	Member	Non-member
	\$500	\$1,200

4) Policy Development: Development of customized, written dealership Sales and Finance policies to be used for current and future staff, outlining basic sales and finance areas of compliance. This task includes some background discussion regarding dealership's current policies and procedures. The typical policy document covers the following matters:

- Sales Licensing
- Demonstration Drives
- Credit Applications and Credit Bureaus
Applications, Retention, OFAC, Adverse Action Red Flags...
- Miscellaneous Sales Disclosure Policies
Negative Equity, Prior History of a Motor Vehicle, including:
 - ✓ Demo
 - ✓ Prior Rental Use
 - ✓ Salvage
 - ✓ Physical Damage (new and used, Carfax policies)
 - ✓ Branded Vehicles
- Documenting the Deal File
Customer copies, Re-Signs, Form Usage, Retention of Forms, Internet Transactions...
- Finance Process
Menus, Optional Products, Pricing, Re-Signs
- Conditional Delivery
- Third Party Assignments on Finance Contracts
- License and Registration Fees
- Forgery
- Monroney Sticker and FTC Buyers Guide
- Misc. Dealership-specific policies

Pricing:	Member	Non-member
	\$600	\$1,400

5) Onsite Dealership Training of Staff/Management: Training of management and/or sales and finance staff on the following matters:

- Federal and State Sales and Finance Documentation Laws
- Introduction of Dealer's Customized Sales and Finance Policies
- In-house staff training on any number of regulatory topics, including: Credit Regulations, Motor Vehicle Labeling, Motor Vehicle Repairs and Services Documentation, IRS Cash Reporting Rule, Safeguarding and Privacy, Advertising.

Typical training session lasts 2-4 hours depending on amount of questions posed during presentation.

Pricing:	Member	Non-Member
	\$450 ½ day	\$1,200 ½ day
	\$850 Full day	\$1,900 Full day

S.A.L.E.S. Team:

Ellen L. Mastrangelo, GCADA Senior Staff Counsel has over 20 years of legal experience in automotive and consumer law, previously serving as an Assistant Attorney General on the Consumer Protection Automotive Enforcement Team for 5 years, and working in-house for a local automotive chain as General Counsel for 12 years. She is a graduate of Kenyon College and the University of Cincinnati - College of Law, and is a member of the Ohio State Bar Association, the Lake County Bar Association and the National Association of Dealership Counsel.

Nick A. Hanna, GCADA Staff Counsel started his career with GCADA in June, 2008, and was admitted to the practice of law in November, 2008. He graduated Cum Laude from Baldwin-Wallace College and is a graduate of the Cleveland Marshall - College of Law, a member of the Ohio State Bar Association, and a Life Member of the Cleveland Marshall Law Alumni Association.