

COST FOR NON-COMPLIANCE

Compliance and documentation issues affect every industry. The following is a partial checklist for automobile dealers of rules, laws and regulations related to the automotive industry.

Your business could be in jeopardy if you are not in compliance with even one of these requirements. Answer Yes or No for each of the following requirements to make sure you're in compliance.

Displayed FTC Buyer's Guide for every vehicle on your lot.	\$250 - \$11,000/per	Y / N
Displaying Spanish buyers guides when transacting business in Spanish.	\$250 - \$11,000/per	Y / N
Transferring title ownership within 30 days of the transaction.	\$1,000/per	Y / N
Checking the "SDN Blocked Persons List" on every customer you do business with.	\$50,000 - \$10 Million + Jail	Y / N
Distributing GLB Privacy Notices to your customers	\$11,000	Y / N
Mailing GLB Annual notices to every customer whose account is still open.	\$11,000	Y / N
Filing IRS/FinCen 8300 Cash Reporting Form	\$25,000 - \$500,000 + Jail	Y / N
Developing internal policies for complying with Anti-Money Laundering requirements.	\$25,000 - \$500,000 + Jail	Y / N
Complying with the Federal Anti-telemarketing "Do Not Call" Laws	\$11,000 & Up	Y / N

Information for Automobile Dealers Regarding OFAC Requirements

- Executive Order 13224 ordered the Office of Foreign Assets Control (OFAC) to make available to financial institutions a list of "blocked persons" known as "Specially Designated Nationals" (SDN). The order among other things, prohibits U.S. citizens and business entities from entering into "any transaction or dealing" with individuals or entities who have been linked to terrorism and appear on the list of "blocked persons".
- The Executive Order requires financial institutions, **which includes car dealerships**, to verify their customers' identity and check their customers' names against the "blocked persons" list.
- The foregoing only highlights certain aspects of the OFAC restrictions. Additional information is available on OFAC's website at www.treas.gov/offices/enforcement/ofac.