



## RV News publishes article on selling outside the dealership by Eric Johnson and Tom Hudson

October 20, 2020 |

In the October 2020 issue of *RV News*, [Eric Johnson](#) and [Tom Hudson](#) caution dealers that negotiating and selling RVs at a customer's home could violate state dealer licensing statutes, the dealership's agreement with their financing sources, and the Federal Trade Commission's Cooling-Off Rule (the "Rule").

According to Eric and Tom, the Rule regulates a dealer's ability to engage in sales at locations other than the dealer's permanent place of business. It also requires disclosures in the sales contract, in a separate notice and orally; gives the buyer a three-day right to cancel; prohibits misrepresentations regarding that right; and restricts a seller's ability to assign the note or contract for a certain period. The Rule and state licensing statutes have been especially important in 2020 during the pandemic when customers may not have been comfortable going into a dealership.

Eric is a partner in the firm's Oklahoma City office and Editor in Chief of CounselorLibrary.com's *Spot Delivery* publication. He assists national and state banks, savings associations, credit unions, mortgage bankers, other licensed lenders, motor vehicles dealers and automotive finance companies in the development and maintenance of nationwide consumer mortgage and automobile finance programs; online motor vehicle sales programs; litigation funding programs; and electronic payment programs. Eric also assists DMS providers of documents and software with federal and state law compliance.

Tom was a founding partner of the firm, and now serves the firm in an Of Counsel capacity. He has practiced consumer financial services law since 1973 and has focused his practice on matters relating to vehicle financing and leasing.

[Click here](#) to read the full article on pages 28-29 in *RV News*.

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