

50-State Automotive Advertising Compliance Reference Guide

Dealer Listing Compliance for Facebook Marketplace & Digital Syndication

Effective May 2026 | Updated with FTC March 2026 Enforcement Action

■ CRITICAL FTC UPDATE — MARCH 2026

The FTC sent warning letters to 97 auto dealership groups on March 13, 2026. The CARS Rule was vacated (Jan 2025), but the FTC Act Section 5 deceptive practices prohibition is fully in force. All-in pricing is now the federal enforcement standard. Digital listings are permanent legal records — every posting made through this platform must meet the requirements in this document.

SECTION 1 — FEDERAL FTC BASELINE (ALL 50 STATES)

These requirements apply to EVERY listing posted in every state. No exceptions.

Required in Every Listing:

- ✓ Accurate year, make, model, trim, mileage, VIN, and availability
- ✓ All-in advertised price — must include ALL mandatory fees (taxes and title excluded only)
- ✓ Advertised price must match actual price charged to consumer
- ✓ Conditional rebates must disclose eligibility requirements
- ✓ Finance terms (if advertised): APR, term, monthly payment, down payment, total of payments
- ✓ Dealer identity — dealership name must appear on listing
- ✓ Add-on products/fees must not be hidden or added post-listing
- ✓ No bait-and-switch — advertised vehicle must be available at advertised price

Prohibited Phrases & Practices (All States):

- x Guaranteed Approval / Everyone Approved
- x No Credit Check
- x \$0 Down (without full financing terms disclosed)

- X Lowest Price Guaranteed (without qualification)
- X Free (without conditions clearly stated)
- X Fake or inflated MSRP discounts
- X Pricing that requires dealer financing to achieve
- X Hidden doc fees, processing fees, or add-ons not in advertised price

RISK LEVEL KEY			
VERY HIGH	Active FTC/state enforcement. Highest litigation risk. Extra scrutiny on every listing.	HIGH	Elevated enforcement environment. Full compliance mandatory.
MEDIUM	Standard enforcement. FTC baseline fully applies.	LOW	Lower enforcement activity. FTC baseline still required.

SECTION 2 — STATE-BY-STATE COMPLIANCE REQUIREMENTS

Each state listing below represents the MINIMUM required disclosures for any vehicle advertisement posted through the Quantum Connect AI platform. Federal requirements (Section 1) apply IN ADDITION to all state-specific requirements below.

California (CA)
VERY HIGH

Required Disclosures:

- ✓ All-in advertised price (mandatory fees included; taxes/title excluded only)
- ✓ VIN or license plate identifier on every listing
- ✓ Dealer name and license number
- ✓ Conditional rebate disclosures (must state availability restrictions)
- ✓ Finance/lease APR, term, monthly payment, total amount payable
- ✓ Add-on products must be itemized and labeled as optional
- ✓ Used vehicle: 10-day right of cancellation disclosure (CA CARS Act — effective Oct 1, 2026)

PROHIBITED: Guaranteed Approval | Everyone Approved | No Credit Check | Lowest Price Guaranteed | \$0 Down (without full terms) | Free (without conditions stated)

CA CARS Act (SB 766) takes effect Oct 1, 2026. Highest enforcement risk in the country. FTC actively pursuing CA dealers.

Florida (FL)
VERY HIGH

Required Disclosures:

- ✓ All-in advertised price including all mandatory dealer fees
- ✓ Dealer fee transparency — doc fee must be disclosed
- ✓ Bait-and-switch protections: advertised vehicle must be available
- ✓ Finance disclosure: APR, term, down payment if featured
- ✓ Conditional rebate eligibility must be clearly stated

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without full disclosure) | Lowest Price (without qualification) | Everyone Qualifies

Strong UDAP enforcement. Dealer fee add-ons at point of sale after a lower price is advertised are a top enforcement trigger.

Illinois (IL)
VERY HIGH

Required Disclosures:

- ✓ All-in price including all mandatory charges
- ✓ Dealer name and Illinois dealer license number
- ✓ Finance terms disclosed if featured in advertising
- ✓ Conditional rebates must disclose eligibility requirements
- ✓ Used vehicle AS-IS disclosure where applicable

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies | \$0 Down (without terms) | Lowest Price

Illinois Consumer Fraud Act is broadly applied. AG office has pursued multi-dealership advertising sweeps.

Massachusetts (MA)

VERY HIGH

Required Disclosures:

- ✓ Total Price = maximum price consumer must pay (all fees included)
- ✓ Mandatory fee rule effective Sept 2, 2025 — doc fees must be in advertised price
- ✓ Finance disclosures: APR, term, monthly payment if advertised
- ✓ Add-on products must be labeled optional and priced separately
- ✓ Rebate conditions must be clearly disclosed

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms) | Free (without qualification) | Best Price

MA AG issued binding fee guidance effective Sept 2, 2025. All-in pricing is now legally required — not optional best practice.

New Jersey (NJ)

VERY HIGH

Required Disclosures:

- ✓ All-in advertised price with mandatory fees disclosed
- ✓ Dealer identification and NJ license number
- ✓ Finance terms: APR, term, down payment if advertised
- ✓ Conditional rebate disclosure required
- ✓ Doc fee must be included in advertised price or separately disclosed

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved | \$0 Down (without terms)

NJ Consumer Fraud Act carries treble damages. One of the highest litigation risk states for dealers.

New York (NY)

VERY HIGH

Required Disclosures:

- ✓ All-in price including all mandatory charges
- ✓ Financing: APR, term, monthly payment, total of payments
- ✓ Used vehicle disclosures per NY AG requirements
- ✓ Fee transparency: all fees must be itemized in advertising
- ✓ Rebate conditions must be fully disclosed

PROHIBITED: Guaranteed Credit Approval | No Credit Check | \$0 Down (without full terms) | Free (without conditions) | Lowest Price

NY AG is aggressive on deceptive auto ads. Digital listings are treated as binding representations.

Pennsylvania (PA)

VERY HIGH

Required Disclosures:

- ✓ All-in advertised price — mandatory fees included
- ✓ Dealer identification and PA license
- ✓ Finance disclosures if payment terms advertised
- ✓ Rebate conditions disclosed
- ✓ Doc fee must be included or separately and conspicuously disclosed

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms) | Free (without conditions)

PA UTPCPL carries significant civil penalties. Price-to-sale consistency is a top enforcement area.

Texas (TX)

VERY HIGH

Required Disclosures:

- ✓ All-in advertised price — mandatory fees must be included
- ✓ Dealer name and TXDMV license number
- ✓ Finance disclosure if payment terms are advertised
- ✓ Rebate eligibility conditions must be disclosed
- ✓ Internet price must match in-store price at time of inquiry

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved | \$0 Down (without terms) | Lowest Price Guaranteed

TXDMV and AG office actively enforce deceptive advertising. Internet-to-dealership price consistency is a primary audit target.

Washington (WA)

VERY HIGH

Required Disclosures:

- ✓ All-in advertised price with mandatory fees
- ✓ Finance disclosure if payment terms are featured
- ✓ Dealer identification required
- ✓ Rebate eligibility conditions must be stated
- ✓ Internet listings must match dealership pricing

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without full terms) | Lowest Price Guaranteed

WA Attorney General actively pursues deceptive auto advertising under CPA. Strong consumer protection environment.

Arizona (AZ)

HIGH

Required Disclosures:

- ✓ All-in price or fee breakdown
- ✓ Dealer identification
- ✓ Finance disclosures if featured
- ✓ Conditional rebate eligibility

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

AZ Consumer Fraud Act broadly applied to digital listings.

Colorado (CO)

HIGH

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer name and CO license
- ✓ Finance terms if featured
- ✓ Rebate conditions stated

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

CO AG actively pursues deceptive auto advertising.

Connecticut (CT)

HIGH

Required Disclosures:

- ✓ All-in price (mandatory fees included — new 2026 requirement)
- ✓ Dealer name and CT license
- ✓ Add-on fees must be itemized and labeled optional
- ✓ Finance terms if featured
- ✓ Rebate conditions disclosed

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

CT issued new 2026 disclosure requirements. FTC warning letters specifically reference CT dealer violations. One of the most active state enforcement environments right now.

Georgia (GA)

HIGH

Required Disclosures:

- ✓ All-in price or mandatory fee breakdown in listing
- ✓ Dealer identification
- ✓ Finance terms if advertised
- ✓ Rebate conditions stated

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

GA Fair Business Practices Act. Enforcement increasing in metro Atlanta market.

Maryland (MD)

HIGH

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer identification
- ✓ Finance disclosures if terms featured
- ✓ Conditional rebate disclosure

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

MD Consumer Protection Act. AG actively monitors auto dealer advertising.

Michigan (MI)

HIGH

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer name and MI license
- ✓ Finance terms if featured
- ✓ Conditional rebate disclosure

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

MI Consumer Protection Act applies to all digital advertising. Active enforcement market.

Minnesota (MN)

HIGH

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer name and MN license
- ✓ Finance terms if featured
- ✓ Rebate eligibility conditions

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

MN Consumer Fraud Act and AG enforcement increasing.

North Carolina (NC)

HIGH

Required Disclosures:

- ✓ All-in price or clear fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if advertised
- ✓ Conditional rebate disclosure

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without full terms)

NC Unfair and Deceptive Trade Practices Act. Strong consumer protection enforcement.

Ohio (OH)

HIGH

Required Disclosures:

- ✓ All-in advertised price or fee itemization
- ✓ Dealer name and Ohio license number
- ✓ Finance disclosures if terms featured
- ✓ Rebate eligibility conditions

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

Ohio AG Consumer Protection Section actively monitors dealer advertising.

Virginia (VA)

HIGH

Required Disclosures:

- ✓ All-in price or clear disclosure of all mandatory fees
- ✓ Dealer name and VA dealer license
- ✓ Finance disclosures if terms are featured
- ✓ Conditional rebate eligibility must be stated
- ✓ Internet price must be honored at point of sale

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms) | Lowest Price Guaranteed

VA Consumer Protection Act is actively enforced. FTC warning letters sent to VA-area dealers in 2026 sweep.

Alabama (AL)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee itemization
- ✓ Dealer identification
- ✓ Finance disclosures if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Alabama Deceptive Trade Practices Act. Follow FTC baseline.

Arkansas (AR)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee breakdown
- ✓ Dealer identification
- ✓ Finance terms if advertised
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Arkansas Deceptive Trade Practices Act. Moderate enforcement.

Delaware (DE)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Delaware Consumer Fraud Act. Moderate enforcement.

Hawaii (HI)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer name and HI license
- ✓ Finance terms if featured
- ✓ Conditional rebate eligibility

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

Hawaii Unfair and Deceptive Acts Practices Act. Moderate enforcement.

Indiana (IN)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee itemization
- ✓ Dealer identification
- ✓ Finance disclosures if featured
- ✓ Conditional rebate eligibility

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

Indiana Deceptive Consumer Sales Act applies to all listings.

Iowa (IA)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Conditional rebate disclosure

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

Iowa Consumer Fraud Act. Follow FTC baseline.

Kansas (KS)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Conditional rebate eligibility

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

Kansas Consumer Protection Act. Follow FTC baseline.

Kentucky (KY)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee itemization
- ✓ Dealer identification
- ✓ Finance disclosures if featured
- ✓ Rebate eligibility conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Kentucky Consumer Protection Act. Moderate enforcement.

Louisiana (LA)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer name and LA license
- ✓ Finance terms if featured
- ✓ Conditional rebate eligibility

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

Louisiana Unfair Trade Practices Act. Follow FTC baseline.

Maine (ME)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Maine Unfair Trade Practices Act. Moderate enforcement.

Missouri (MO)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if advertised
- ✓ Conditional rebate disclosure

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

Missouri Merchandising Practices Act. Follow FTC baseline.

Nevada (NV)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee itemization
- ✓ Dealer identification and NV license
- ✓ Finance disclosures if featured
- ✓ Rebate eligibility conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

NV Deceptive Trade Practices Act. Follow FTC baseline.

New Hampshire (NH)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

NH Consumer Protection Act. Follow FTC baseline.

New Mexico (NM)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee itemization
- ✓ Dealer identification
- ✓ Finance disclosures if featured
- ✓ Conditional rebate disclosure

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

NM Unfair Practices Act. Follow FTC baseline.

Oklahoma (OK)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if advertised
- ✓ Conditional rebate disclosure

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

Oklahoma Consumer Protection Act. Follow FTC baseline.

Oregon (OR)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer name and OR license
- ✓ Finance terms if featured
- ✓ Conditional rebate eligibility

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

Oregon Unlawful Trade Practices Act. Follow FTC baseline — moderate enforcement.

Rhode Island (RI)

MEDIUM

Required Disclosures:

- ✓ All-in price or mandatory fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Conditional rebate eligibility

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

RI Deceptive Trade Practices Act. Moderate enforcement.

South Carolina (SC)

MEDIUM

Required Disclosures:

- ✓ All-in price or clear fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

SC UTPA. Follow FTC baseline.

Tennessee (TN)

MEDIUM

Required Disclosures:

- ✓ All-in price or clear fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions if applicable

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

TN Consumer Protection Act. Moderate enforcement — follow FTC baseline.

Utah (UT)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer name and UT license
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Utah Consumer Sales Practices Act. Moderate enforcement.

Vermont (VT)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Conditional rebate disclosure

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

Vermont Consumer Protection Act. Moderate enforcement.

Wisconsin (WI)

MEDIUM

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer name and WI license
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

WI Consumer Act. Follow FTC baseline — moderate enforcement.

Alaska (AK)

LOW

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Alaska Unfair Trade Practices Act. Follow FTC baseline.

Idaho (ID)

LOW

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

Idaho Consumer Protection Act. Low enforcement — follow FTC baseline.

Mississippi (MS)

LOW

Required Disclosures:

- ✓ All-in price or fee breakdown
- ✓ Dealer identification
- ✓ Finance terms if advertised
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Mississippi Consumer Protection Act. Follow FTC baseline.

Montana (MT)

LOW

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Montana Consumer Protection Act. Follow FTC baseline.

Nebraska (NE)

LOW

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions if applicable

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

Nebraska Consumer Protection Act. Lower enforcement — still follow FTC baseline.

North Dakota (ND)

LOW

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured
- ✓ Rebate conditions

PROHIBITED: Guaranteed Approval | No Credit Check | \$0 Down (without terms)

ND Consumer Fraud Act. Follow FTC baseline.

South Dakota (SD)

LOW

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Qualifies

SD Deceptive Trade Practices Act. Follow FTC baseline.

West Virginia (WV)

LOW

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

WV Consumer Credit and Protection Act. Follow FTC baseline.

Wyoming (WY)

LOW

Required Disclosures:

- ✓ All-in price or fee disclosure
- ✓ Dealer identification
- ✓ Finance terms if featured

PROHIBITED: Guaranteed Approval | No Credit Check | Everyone Approved

Wyoming Consumer Protection Act. Follow FTC baseline.

SECTION 3 — PLATFORM IMPLEMENTATION CHECKLIST

Pre-Listing Validation (Every Post)

- All-in price validation fires before publish — mandatory fees confirmed included
- VIN verified and mapped to correct year/make/model/mileage
- Dealer name and license number present in listing
- No prohibited trigger phrases detected in title or description
- Conditional rebates: eligibility conditions disclosed if price includes rebate
- Finance terms: if payment is advertised, APR/term/down payment present

State-Specific Triggers

- CA listings: VIN required, add-ons labeled optional, CA CARS Act disclosures by Oct 1, 2026
- MA listings: Total Price = all-in price (mandatory since Sept 2, 2025)
- CT listings: New 2026 fee disclosure requirements applied
- TX listings: Internet price locked to in-store price at time of inquiry
- NY/NJ listings: All fees itemized, finance disclosures complete
- FL listings: Doc fee included in advertised price or separately disclosed

Audit Trail Requirements

- Every listing timestamped and version-stored at time of publication
- Price at time of posting logged and locked
- Any edits to live listings trigger a new compliance validation
- Listing history retained for minimum 24 months

Prohibited Content Auto-Block

- System flags and blocks all prohibited trigger phrases before posting
- Duplicate VIN detection across rep accounts active
- Templated description variation enforced — no identical listing text across accounts
- Photo ordering randomized per listing to reduce coordination signals

LEGAL DISCLAIMER: This document is a compliance reference framework produced by Quantum Connect AI for operational guidance purposes only. It does not constitute legal advice. State regulations change frequently. Dealerships operating in high-risk states (CA, MA, FL, TX, NY, NJ, CT, WA, IL, PA, VA) should engage qualified automotive advertising counsel to review current listings against the latest FTC enforcement standards and applicable state law. Last updated: May 2026.