

**COLORADO DEPARTMENT OF REVENUE
MOTOR VEHICLE DEALER BOARD**

**AID Case No. BD 23-1178
OAC Case No. MV 2024-0010**

STIPULATION AND FINAL AGENCY ORDER

IN THE MATTER OF: AUTO INTEGRITY
Used Motor Vehicle Dealer License 3479
Respondent.

IT IS HEREBY STIPULATED & AGREED by and between the Colorado Department of Revenue, Auto Industry Division ("Division"), Motor Vehicle Dealer Board ("Board") and Auto Integrity ("Respondent") (collectively the "Parties") in lieu of further legal action:

1. The Board has jurisdiction over Respondent and the subject matter of this Stipulation and Final Agency Order ("Order") as set forth in article 20 of Title 44, C.R.S., and the Administrative Procedure Act, article 4 of Title 24, C.R.S.
2. Respondent has been licensed as a used motor vehicle dealer in the State of Colorado at all times relevant herein.
3. The Board has alleged in this case that Respondent violated the following:
 - A. Violating any state or federal law respecting commerce or motor vehicles, or any lawful rule or regulation respecting commerce or motor vehicles promulgated by any licensing or regulating authority pertaining to motor vehicles, under circumstances in which the act constituting the violation directly and necessarily involves commerce or motor vehicles in violation of 44-20-121(3)(m), C.R.S.; To wit: Section 42-3-116(6), C.R.S.;
 - B. Violating any state or federal law respecting commerce or motor vehicles, or any lawful rule or regulation respecting commerce or motor vehicles promulgated by any licensing or regulating authority pertaining to motor vehicles, under circumstances in which the act constituting the violation directly and necessarily involves commerce or motor vehicles in violation of 44-20-121(3)(m), C.R.S.; To wit: Section 42-3-121(1), C.R.S. and Regulation 1 C.C.R. 204-10, Rule 48 2.8 2.9;
 - C. Engaging in business through employment of an unlicensed motor vehicle salesperson in violation of section 44-20-121(3)(l), C.R.S.;

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- D. Allowing persons to exercise a privilege granted under a license that person does not hold and to knowingly allow such an exercise in violation of sections 44-20-121(3)(b) and 44-20-110(2), C.R.S.;
 - E. Failing to post hours of operation and be open during business hours in violation of section 44-20-121(3)(b), C.R.S. and Regulation 1 C.C.R. 205-1, 44-20-121(3)(k); and
 - F. Failing to provide copies of and/or access to business documents requested by the Auto Industry Division in violation of section 44-20-121(3)(b), C.R.S., and Regulation 1 C.C.R. 205-1, 44-20-102(22) (9).
4. Respondent understands that:
- A. Respondent has the right to be represented by an attorney of Respondent's choice, at Respondent's expense;
 - B. Respondent has the right to a formal hearing in accordance with article 20 of Title 44, C.R.S.;
 - C. By entering into this Order, Respondent knowingly and voluntarily waives the right to a hearing, and relieves the Board of its burden of proving the violations alleged herein;
 - D. Respondent knowingly and voluntarily waives the right to present a defense by oral and documentary evidence, and to cross-examine witnesses who would testify on behalf of the Board; and,
 - E. Respondent knowingly and voluntarily waives the right to judicial review of this matter.
5. Respondent acknowledges receipt of sufficient notice, sufficient advisement of rights, and sufficient process in the proceedings of this case, and desires to resolve all issues which were the subject of the investigation, by entering into this Stipulation and Final Agency Order.
6. The Respondent admits to the allegation alleged above in Paragraph 3(A) of this Stipulation and Final Agency Order.
7. Respondent agrees, in lieu of subsequent administrative proceedings, to the following:
- A. Respondent shall pay a fine of \$10,000.00 for admitting the allegation in Paragraph 3(A).
 - B. \$1,500.00 of the total \$10,000.00 fine shall be paid in three (3) installments, per the following payment schedule:

- (1) \$500.00 shall be due and payable thirty (30) days from the date this Order is approved by the Board;
 - (2) \$500.00 shall be due and payable sixty (60) days from the date this Order is approved by the Board; and
 - (3) \$500.00 shall be due and payable ninety (90) days from the date this Order is approved by the Board.
- C. The remaining \$8,500.00 of the total \$10,000.00 fine shall be deferred and payable only if Respondent commits a future violation of any section of article 20 of Title 44, C.R.S., or of any regulation in 1 C.C.R. 205-1, during the one (1) year following the date that this Stipulation and Final Agency Order is approved by the Board; and
- D. Respondent shall contract with the Colorado Independent Automobile Dealers Association ("CIADA") for their on-site Pre-Licensing Class. Respondent shall contract for the Pre-Licensing Class to be completed within sixty (60) days from the date of this Stipulation and Final Agency Order is approved by the Board. Respondent shall file a Certificate of Completion from the Pre-Licensing Class with the Executive Secretary at the Auto Industry Division within thirty (30) days after completion. Respondent shall be responsible for all costs associated with the Pre-Licensing Class.
8. Respondent acknowledges that the Board has sufficient credible evidence to support a finding of a violation by Respondent for the allegation listed in Paragraph 3(A) of this Order, should the case proceed to hearing.
9. Respondent agrees to strictly adhere to and to completely fulfill all requirements established in this Order.
10. This Order will not become an order of the Board unless and until the Board approves it. If this Order is not approved by the Board, it is void, and the Parties shall not be bound by any provisions hereof or admissions herein.
11. Each Party shall bear its own costs and fees incurred in this action.
12. This Order is the complete integration of all understandings between the Parties. No addition, deletion, or amendment shall have any force or effect whatsoever, except as mutually agreed to in a writing signed by both Parties.
13. The Parties agree to cooperate fully and to execute any and all supplementary documents and to take all additional actions necessary or appropriate to give full force and effect to the terms and intent of this Order.
14. The provisions of this Order shall be enforceable by the Parties before the Colorado Motor Vehicle Dealer Board, by any lawful remedy.

15. Respondent expressly acknowledges having read and understood completely the terms of this Order. Respondent enters this Order knowingly and voluntarily, after the opportunity to consult with counsel, and with full understanding of the legal consequences of this Order. Respondent expressly states the terms of this Order are fair, conscionable, and appropriate to reach a full and final resolution of this disciplinary matter.

16. This Order and all its terms shall have the same force and effect as an order entered by the Board after hearing pursuant to article 20 of Title 44, C.R.S., except that this Order cannot be appealed.

17. Respondent agrees that any violation of this Order may constitute grounds for disciplinary action and, if proven, may constitute a basis for further sanctions or for any other remedy authorized by law.

18. If this matter is referred to hearing for violation of this Order, this Order shall be admissible as evidence.

19. If an alleged violation of this Order is taken to hearing and the facts that constitute the violation are not proven, the Board shall not impose any additional sanctions, and this Order shall remain operative and in full force and effect. Respondent must comply with the terms of this Order during the pendency of, and after the conclusion of, such disciplinary action.

20. Once effective, this Order becomes a public record in the Board's custody at all times.

21. Effective Date. This Order becomes an order of the Board when accepted by the Board and signed by an authorized representative of the Board.

22. This Order is a full and final resolution of case number BD 23-1178. This Order does not resolve any other cases, complaints or matters, known or unknown to the Parties, as of the effective date of this Stipulation and Final Agency Order.

23. Respondent shall immediately provide written notice to the Board of any change of Respondent's address. Any notice required under this Order shall be valid if provided, in writing, to the last known written address provided to the Board by Respondent, which currently is:

Mr. Keith Knutson
Auto Integrity
2985 W. 29th Street, Unit A
Greeley, CO 80631

24. All correspondence and notices to the Board must be provided to the Board at the following address:

Colorado Motor Vehicle Dealer Board
John Opeka, Acting Executive Secretary

1707 Cole Boulevard, Suite 300
Lakewood, Colorado 80401

25. Should any term or provision of this Order be declared invalid or become inoperative for any reason, such invalidity or failure does not affect the validity of any other term or provision hereof.

26. This Order may be signed in counterparts, each of which has full force and effect upon execution by all Parties.

27. Respondent warrants that it possesses the legal authority to enter into this Order and that it has taken all actions required by its procedures, by-laws, and/or applicable laws to exercise that authority, and to lawfully authorize its undersigned signatory to execute this Order and to bind Respondent to its terms.

28. The person executing this Order on behalf of Respondent warrants that such person has full authorization to execute this Stipulation and Final Agency Order.

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AGREED TO BY:

John Opcka
Deputy Director/ Acting Executive Secretary
Auto Industry Division
Motor Vehicle Dealer Board

Date

FOR THE RESPONDENT:

Keith Knutson
Keith Knutson
Auto Integrity, Owner

8-15-25
Date

APPROVED AS TO FORM:

Sarah Killeen
Sarah E. Killeen, #31992
Senior Assistant Attorney General
Attorney for the Colorado
Motor Vehicle Dealer Board

8-26-2025
Date

The Order is approved and its terms are hereby adopted as an Order of this Board.

ORDERED AND ENTERED this 21st day of October, 2025.

COLORADO MOTOR VEHICLE DEALER BOARD

BY: _____
Amanda Gordon, President

AGREED TO BY:

John Opeka

Digitally signed by John Opeka
Date: 2025.10.21 12:37:57
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John Opeka
Director/Executive Secretary
Auto Industry Division
Motor Vehicle Dealer Board

10/21/2025

Date

FOR THE RESPONDENT:

Keith Knutson
Auto Integrity, Owner

Date

APPROVED AS TO FORM:

Sarah E. Killeen, #31992
Senior Assistant Attorney General
Attorney for the Colorado
Motor Vehicle Dealer Board

Date

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COLORADO MOTOR VEHICLE DEALER BOARD

BY: _____

Amanda Gordon, President

AGREED TO BY:

John Opeka
Deputy Director/ Acting Executive Secretary
Auto Industry Division
Motor Vehicle Dealer Board

Date

FOR THE RESPONDENT:

Keith Knutson
Auto Integrity, Owner

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ORDERED AND ENTERED this 21st day of October, 2025.

COLORADO MOTOR VEHICLE DEALER BOARD

BY: _____

Amanda Gordon, President

CERTIFICATE OF SERVICE

This is to certify that I have duly served the within STIPULATION AND FINAL AGENCY ORDER upon all parties herein by depositing copies of same in the United States mail, first-class postage prepaid, at Denver, Colorado, and personal service (as noted), this 22nd day of October, 2025, addressed as follows:

Mr. Keith Knutson
Auto Integrity
2985 W. 29th Street, Unit A
Greeley, CO 80631
Kknutson.autointegrity@gmail.com

Sarah Killeen, # 31992
Senior Assistant Attorney General
1300 Broadway, 8th Floor
Denver, Colorado 80203
Sarah.Killeen@coag.gov

Office of Administrative Courts
dpa_oac-gs@state.co.us

John Opcka, Deputy Executive Secretary
Colorado Motor Vehicle Dealer Board
Deputy Director Auto Industry Division
1707 Cole Blvd., Suite 300
Lakewood, Colorado 80401
(Placed in Board File)

Lisa Garcia
Legal Assistant
Auto Industry Division
1707 Cole Blvd., Suite 300
Lakewood, Colorado 80401

Digitally signed by
Lisa Garcia
Date: 2025.10.22
11:50:12 -06'00'

Lisa Garcia
Legal Assistant