

**COLORADO DEPARTMENT OF REVENUE HEARINGS DIVISION
ON BEHALF OF THE COLORADO MOTOR VEHICLE DEALER BOARD**

Case No. 24A008

AID Case Nos. BD 23-1299 & 24-1289

STIPULATION AND FINAL AGENCY ORDER

IN THE MATTER OF: Guido Francisco Del Valle Cavalli Seijas
Salesperson License Number: 204604

Respondent.

IT IS HEREBY STIPULATED & AGREED by and between the Colorado Department of Revenue, Auto Industry Division ("Division"), Motor Vehicle Dealer Board ("Board") and Mr. Guido Francisco Del Valle Cavalli Seijas ("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 motor vehicle salesperson in the State of Colorado at all times relevant herein.

3. On June 21, 2024, the Board filed a Notice of duty to Answer, Notice of Hearing, and Notice of Charges against Respondent for Case number 23-1299.

4. On December 26, 2024, the Board filed an Amended Notice of Charges to include case number 24-1289, in which the Board alleged that Respondent violated the following:

- A. Having engaged in any fraudulent business practice in violation of section 44-20-121(6)(e), C.R.S. (Charge I);
 - B. Having violated any state or federal law respecting commerce or motor vehicles, to wit attempting to influence any public servant, in violation of section 44-20-121(6)(o), C.R.S., to wit section 18-5-306, C.R.S. (Charge II); and
 - C. Having violated any state or federal law respecting commerce or motor vehicles, to wit attempting to influence any public servant, in violation of section 44-20-121(6)(o), C.R.S., to wit section 1 C.C.R. 204-10, Rule 48 (2.8) (Charge III).
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. 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.

7. Respondent agrees, in lieu of subsequent administrative proceedings, to submit to the followingsanctions:

- A. Payment of a fine of \$5,000.00;
- B. Of the \$5,000.00 fine, \$2,000.00 shall be paid within thirty (30) days of the execution date of this Stipulation and Final Agency Order;
- C. The remaining \$3,000.00 of the fine shall be deferred and payable only if Respondent has any additional violations of statutes and regulations during the one (1) year following the date this Stipulation and Final Agency Order is approved by the Board; and
- D. Respondent shall take and complete a Pre-Licensing Class through the Colorado Independent Automobile Dealers Association ("CIADA") within sixty (60) days of the effective date of this Stipulation and Final Agency Order. Respondent shall file a Certificate of Compliance 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 agrees to strictly adhere to and to completely fulfill all requirements established in this Order.

9. 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.

10. Each Party shall bear its own costs and fees incurred in this action.

11. 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.

12. 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.

13. The provisions of this Order shall be enforceable by the Parties before the Colorado Motor Vehicle Dealer Board, by any lawful remedy.

14. 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.

15. 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.

16. 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.

17. Respondent acknowledges that the Board has sufficient credible evidence to support a finding of a violation by the Respondent for each of the allegations listed in the Notice of Charges, should the case proceed to hearing

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 sanction, 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.

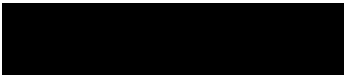
20. Once effective, this Order becomes a public record in the Board's custody at all times.

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 numbers BD 23-1299 and 24-1289 (also designated as Colorado Dept. of Revenue, Hearings Division case no. 24A008). 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. Guido Fransisco Del Valle Cavalli Seijas



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

Colorado Department of Revenue, Auto Industry Division
Chris Rouze, Division Director /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 she possesses the legal authority to enter into this Order and that she has taken all actions required to bind herself 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.

APPROVED AS TO FORM:



Michael McKinnon, # 24689

E-Mail: mgmckinnon@msn.com

Counsel for Respondent Seijas

4/14/25
Date



Sarah Killeen, #31992

Senior Assistant Attorney General

Ralph L. Carr Colorado Judicial Center

1300 Broadway, 8th Floor

Denver, Colorado 80203

Email: sarah.killeen@coag.gov


Counsel for the Colorado

Motor Vehicle Dealer Board

4-14-2025

Date

FOR THE RESPONDENT:



Guido Francisco Del Valle Cavalli Seijas
Respondent

4/11/25
Date

AGREED TO BY:

John Opeka Digitally signed by John Opeka
Date: 2025.06.20 12:48:32
+06'00' By: John Opeka
For: Chris J. Rouze

Chris J. Rouze
Director/ Executive Secretary
Auto Industry Division
Motor Vehicle Dealer Board

May 20, 2025

Date

FOR THE RESPONDENT:

Guido Francisco Del Valle Cavalli Seijas
Respondent

Date

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

ORDERED AND ENTERED this 20th day of May, 2025.

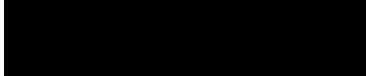
COLORADO MOTOR VEHICLE DEALER BOARD

BY: 
Kevin Shaughnessy, 1st Vice President

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Stipulation and Final Agency Order was served on the following parties via United State Mail, first class, postage prepaid, this 21st day of May, 2025, and with courtesy copy by electronic mail as noted.

Guido Fransico Del Valle Cavalli Seijas



Colorado Motorcars
1690 W. Hamilton Place
Sheridan, CO 80110

Sarah Killeen
Senior Deputy Assistant General
Sarah.killeen@coag.gov

**Lisa
Garcia**

Digitally signed by
Lisa Garcia
Date: 2025.05.21
10:33:15 -06'00'

Lisa Garcia, Legal Assistant
Auto Industry Division