

Utah Division of Consumer Protection  
160 East 300 South, Second Floor  
PO Box 146704  
Salt Lake City, UT 84114-6704  
PH. (801) 530-6601

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**BEFORE THE DIVISION OF CONSUMER PROTECTION  
OF THE DEPARTMENT OF COMMERCE  
OF THE STATE OF UTAH**

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**IN THE MATTER OF:**

**RV & TRAILER SUSPENSION & TIRE  
LLC**, a Utah limited liability company; and

**DEREK JONES**, an individual and a  
member and manager of **RV & TRAILER  
SUSPENSION & TIRE LLC**;

**Respondents.**

**ADMINISTRATIVE CITATION**

**DCP Legal File No. CP-2026-011  
DCP Case No. 163222**

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PURSUANT TO THE AUTHORITY granted by Utah Code § 13-2-6, which empowers the Division of Consumer Protection (Division) to issue a citation upon reasonable cause to believe a person has violated or is violating any statute listed in Utah Code § 13-2-1, it appears, upon information and belief, that you are in violation of the *Utah Consumer Sales Practices Act* (CSPA), Utah Code § 13-11-1 *et seq.*, and the *Utah Consumer Sales Practices Act Rules* (CSPA Rules), Utah Admin Code § R152-11 *et seq.* The Division incorporates by reference all information in the Notice attached to this Citation. The Division alleges:

## **RESPONDENTS**

1. RV & Trailer Suspension & Tire LLC (RV & Trailer) is an administratively dissolved Utah limited liability company with a registered address of 1434 North 300 West, Beaver, Utah 84713.
2. Derek Jones (Respondent Jones) is a Utah Resident and was the sole member and manager of RV & Trailer.
3. The individual and business identified above will be referred to collectively as "Respondents."
4. At all times relevant to this Citation, Respondents operated a RV repair shop in Beaver, Utah.

## **BACKGROUND AND INFORMATION**

5. On or about June 6, 2025, Respondent Jones approached Utah consumer JK (see Appendix A) at a McDonald's restaurant in Beaver, Utah.
6. Respondent Jones claimed to have observed the wheels on JK's RV wobbling as the vehicle entered the parking lot and stated that it appeared to be unsafe.
7. Respondent Jones represented to JK that Respondents had a nearby RV repair shop and offered to inspect JK's vehicle free of charge.
8. Respondent Jones told JK that "he would not be able to live with himself if JK left with the RV in that condition."
9. Based upon the Respondents' representation made regarding the dangerous condition of the vehicle, JK agreed to the inspection.

10. Upon completion of the inspection of the vehicle, Respondents told JK that "bad bushings on the dual axle balancer" needed to be repaired.
11. Respondents also informed JK that the entire load balancer needed to be replaced to "properly repair" this issue.
12. Respondent Jones further represented to JK that "if he were the one driving the RV through mountain passes and the Virgin River Gorge, he would want the bad bushing replaced."
13. Based on Respondents' representations, and to ensure a safe 18-day vacation, JK agreed to have Respondents install an HD MORryde Equalizer kit with HD shackles.
14. On June 6, 2025, JK paid Respondents \$2,469.04 via credit card for the parts and labor.
15. In early July 2025, upon returning home from the vacation, JK took the RV back to the dealer who sold the RV to JK in May 2025. JK requested the dealer inspect the vehicle and the bushings that had been removed by Respondents.
16. The dealer inspected the RV's wheels and bushings to evaluate the necessity and quality of Respondents' work.
17. Upon completion of the inspection, the dealer informed JK that there was no evidence of failure regarding the original bushings, and that the work performed by Respondents was unnecessary. The Respondents had simply replaced the functional part with an "upgraded" bushing model designed for smoother wear.

18. The dealer also estimated a reasonable cost for the repair performed by Respondents would normally be between \$170 and \$340 for the parts, with a maximum of two hours of labor.
19. JK called Respondents and asked if Respondents would be willing to refund the price of the repair.
20. JK and Respondents could not agree on a refund amount.
21. On or about July 16, 2025, JK filed a complaint with the Division.

### COUNT 1

22. Respondents initiated an unsolicited encounter with JK at a McDonald's, stating to have observed the RV's wheels wobbling, and expressed a concern as to the safety of the RV. Upon inspecting the vehicle, Respondents claimed to find further mechanical issues with the bushings. Respondents represented to JK that the RV was in a dangerous condition necessitating repair, when in fact, such was not the case.
23. The above actions violate the CSPA Rule, Utah Code § R152-11-5(A)(9):
  - A. It shall be a deceptive act or practice in connection with a consumer transaction involving repairs, inspections, or other similar services for a supplier to:
    - (9) Represent that the goods being inspected or diagnosed are in a dangerous condition or that the consumer's continued use of them may be harmful to him when such is not the fact;
24. **The above actions are alleged as one violation of the above-referenced rule, with a maximum potential fine of up to \$2,500 per violation.**

**COUNT 2**

25. Respondents represented to JK that the RV wheels needed an inspection, and that the bushings on the dual axle balancer needed replacement and repair, when such was not the case.
26. The above actions violate the CSPA Rule, Utah Code § R152-11-5(A)(6):
- A. It shall be a deceptive act or practice in connection with a consumer transaction involving repairs, inspections, or other similar services for a supplier to:
- (6) Represent that repairs, inspections, or other services are necessary when such is not the fact;
27. **The above actions are alleged as one violation of the above-referenced rule, with a maximum potential fine of up to \$2,500 per violation.**

**Total Alleged Counts:           2**  
**Total Potential Fine Amount:   \$5,000**

**RELIEF**

The Division has considered: the seriousness, nature, circumstances, extent, and persistence of the alleged conduct; the harm caused by the alleged conduct; the Respondents' efforts to prevent violations of the law, to mitigate the harm caused by the violation, its history of previous violations, and its level of cooperation with the Division's investigation; and the need to deter Respondents and others from committing the same violation(s) in the future.

Based on the foregoing, the Division imposes a fine of \$5,000<sup>1</sup> against Respondents, and orders Respondents to cease and desist from violating *Consumer Sales Practices Act* (CSPA), Utah Code § 13-11-1 *et seq.* and the *Utah Consumer Sales Practices Act Rules* (CSPA Rules), Utah Admin Code § R152-11 *et seq.*

If Respondents fail to request a hearing within 20 calendar days of issuance of this Citation, the Citation will become the FINAL ORDER of the Division. Utah Code § 13-2-6(3)(e)(i). Please review the attached Notice, Frequently Asked Questions, and Request for Review documents for important information about your rights.

DATED this 12 day of March, 2026.



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Brad Bailey – Investigator  
UTAH DIVISION OF CONSUMER PROTECTION

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<sup>1</sup> This amount may be reduced by the Division Director at the Director's discretion. See Utah Code § 13-2-6(3)(f).

**Appendix A**

<b>Consumer Name</b>	<b>Consumer Initials</b>	<b>City of Residence</b>	<b>State of Residence</b>
[REDACTED]	JK	[REDACTED]	UT

**CERTIFICATE OF SERVICE**

I certify that I have this day issued and served the foregoing citation on the parties of record in this proceeding set forth below by mailing a copy thereof, properly addressed by first class mail and certified mail with postage prepaid, to:

RV & TRAILER SUSPENSION & TIRE LLC  
1434 NORTH 300 WEST  
BOX 7  
BEAVER, UT 84714

Certified Article Number  
[REDACTED]  
SENDER'S RECORD

DEREK JONES  
1434 NORTH 300 WEST  
BOX 7  
BEAVER, UT 84714

Certified Article Number  
[REDACTED]  
SENDER'S RECORD

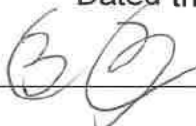
I hereby certify that I have this day issued and served the foregoing citation by email to the following:

Derek Jones  
[REDACTED]

Division of Consumer Protection  
dcplegal@utah.gov

Department of Commerce - Administrative Law Judges  
CommerceALJs@utah.gov

Dated this 12 day of March, 2026.

  
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Brad Bailey – Investigator  
UTAH DIVISION OF CONSUMER PROTECTION

**NOTICE - IMPORTANT - READ CAREFULLY**

This citation may be contested by filing a request for review, in writing, within 20 days of issuance of this citation. Following receipt of a request for review, an informal hearing will be scheduled before the State of Utah, Department of Commerce, Division of Consumer Protection pursuant to Utah Code § 63G-4-203, Procedures for Informal Adjudicative Proceedings. The purpose for the hearing is a review of the citation for factual and legal sufficiency and other questions to be determined by the presiding officer.

A citation that is not contested becomes the final order of the Division. Utah Code § 13-2-6(3)(e)(i) A defaulted party may make a motion to the presiding officer to set aside a default. Utah Code § 63G-4-209(3). The defaulted party may seek agency review pursuant to Utah Code § 63G-4-301, or reconsideration pursuant to Utah Code § 63G-4-302, only of the presiding officer's decision on the motion to set aside the default. See Utah Code § 63G-4-209(3)(c).

In addition to any fines that may be levied, a cease and desist order may be entered against you. An intentional violation of a final cease and desist order is a third degree felony. Utah Code § 13-2-6(2).

To request a review of the citation, please send your written request for review to [DCPLegal@utah.gov](mailto:DCPLegal@utah.gov), or by mail to:

Katherine Hass – Director  
Utah Division of Consumer Protection  
160 East 300 South, Second Floor  
PO Box 146704  
Salt Lake City, UT 84114-6704

A presiding officer will be designated by the Director of the Division of Consumer Protection to conduct the hearing in your case and may be reached at:

Department of Commerce - Administrative Law Judges  
Heber M. Wells Bldg., 2nd Floor  
160 East 300 South  
Salt Lake City, UT 84114  
(801) 530-6166  
Email: [CommerceALJs@utah.gov](mailto:CommerceALJs@utah.gov)

A copy of Utah Admin. Code R477-101, Administrative Law Judge Conduct Committee, is available online at <https://rules.utah.gov/publicat/code/r477/r477-101.htm>.

Please be advised that all inquiries, correspondence, or other contacts concerning this citation, with the exception of any written request for review as set out above, should be directed to the below-named Division employee, designated by the Director of the Division of Consumer Protection pursuant to Utah Code § 13-2-6(3):

Brad Bailey – Investigator  
Utah Division of Consumer Protection  
PO Box 146704  
Salt Lake City, UT 84114-6704  
Telephone: (801) 530-6601

## FREQUENTLY ASKED QUESTIONS

1. **How can I talk to someone at the Division about this citation?** The name of the investigator assigned to your case appears at the end of your citation. If you call the Division, 801-530-6601 and press 0, the receptionist can help transfer you to the assigned investigator.
2. **Can I resolve the citation without a hearing?** Contact the investigator assigned to your case if you are interested in a settlement to see if a settlement is possible in your case.
3. **How do I respond to the citation?** You may challenge the citation by submitting a written Request for Review using the attached form or using your own form.
4. **How long do I have to respond to the citation?** You have 20 calendar days from issuance of the citation to submit a Request for Review.
5. **What happens after I submit a Request for Review?** The presiding officer will send you a Notice of Administrative Hearing specifying a time, date, and location of a hearing before the Division.
6. **Who will preside over the case?** The name of the presiding officer for the hearing will be on your Notice of Administrative Hearing. Please address the presiding officer by name (e.g., "Judge Smith"). You may contact the presiding officer with any technical or procedural questions, but the presiding officer may not discuss the merits of the case with you.
7. **What if I have a scheduling conflict with the scheduled hearing time?** Failure to attend a hearing may result in a default and entry of judgment against you. You may ask the presiding officer assigned to your case, in writing, to reschedule the hearing if you have a conflict or require more time to prepare. A request for additional time is within the discretion of the presiding officer and may not be granted, particularly if requested only shortly before the scheduled hearing.
8. **What should I expect at a hearing?** An administrative law judge will act as the presiding officer and direct the proceeding. The hearing room has two tables for the parties, with the presiding officer sitting at the front of the hearing room. Generally, you (and your counsel, if applicable) will sit at one of the tables and Division staff will sit at the other table. Beginning with the Division, both sides will have an opportunity to present witnesses, evidence, and argument in support of why the citation should or should not stand.
9. **What kind of evidence can I present?** All parties may testify, present evidence, and comment on the issues. In presenting evidence, any party may examine witnesses and submit exhibits. At the request of either party, or at his or her own initiative, the presiding officer may also choose to examine a witness. Any party may ask to present a witness by telephone. The presiding officer may exclude any evidence he or she deems irrelevant, immaterial, or unduly repetitious or improper.
10. **How can I determine what evidence the Division has?** Discovery is prohibited in informal hearings, but parties may request information contained in the agency's files to the extent permitted by law. You may contact the assigned investigator to request access to this information.
11. **What is the burden of proof for the Division at a hearing?** Generally, the Division is responsible to prove its case against you by substantial evidence.
12. **Must I have an attorney?** You may represent yourself or be represented through an attorney. You may also represent a business that you own or manage.

You should not rely on this letter alone for instructions regarding hearings. The hearing is governed by law (including the Administrative Procedures Act, see Utah Code § 63G-4 *et al.*, Utah Division of Consumer Protection, see Utah Code § 13-2 *et al.*, and Department of Commerce Administrative Procedures Act Rules, see Utah Admin. Code R151-4.) You may access these laws and rules at [le.utah.gov](http://le.utah.gov) and [rules.utah.gov](http://rules.utah.gov).



DIVISION OF CONSUMER PROTECTION  
Heber M. Wells Building  
160 East 300 South  
PO Box 146704  
Salt Lake City, UT 84114-6741  
Telephone: (801) 530-6601  
Email: dcplegal@utah.gov

### REQUEST FOR REVIEW

DCP Legal File No.		Date of Citation:	
Name:		Phone: ( )	
Address:			
City:	State:	Zip:	
Email:			

**Requests for review must be received by the division within 20 calendar days of issuance of the citation. Utah Code § 13-2-6(3). If you fail to make a timely request, the citation shall become the final order of the division. If you represent multiple respondents, please submit a separate request for each respondent.**

**You may wish to consult an attorney before submitting this form and any attachments.**

Select only one of the following:

- I admit to the statutory violation(s) described in the citation. The presiding officer will enter an order, impose a fine, and issue a cease and desist order.
- I admit to the statutory violation(s) described in the citation, but request a hearing to explain the circumstances of the violation(s) and request a reduced fine. *(If desired, attach a brief typewritten explanation of the circumstances of the violations. The presiding officer may ask you to submit an additional response.)*
- I contest the occurrence of the violation(s) described in the citation and request a hearing to contest the citation. *(If desired, attach a brief typewritten response to the allegations in the citation. The presiding officer may ask you to submit an additional response.)*

I certify that I have knowingly and voluntarily made the above election of rights. I understand that if I request a hearing the presiding officer will notify me in writing of the hearing date. If I fail to appear at the hearing, a default judgment may be entered against me. I acknowledge that I have either sought the advice of an attorney or have voluntarily chosen not to do so.

Signature	Date of Signature
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