

Press Coverage | December 24, 2025

## State Regulators Are Stepping in as Auto Compliance Risks Build for 2026

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Brooke K. Conkle | Christopher J. Capurso

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Brooke Conkle and Chris Capurso, attorneys with Troutman Pepper Locke and co-hosts of *Moving the Metal: The Auto Finance Podcast*, were quoted in the December 24, 2025 *Car Dealership Guy* article, “State Regulators Are Stepping in as Auto Compliance Risks Build for 2026.”

“We haven’t seen the aftershock yet, but I think it’s just a matter of time,” said Chris Capurso, associate at Troutman Pepper Locke. (4 min. read)

However, as Brooke Conkle, partner at Troutman Pepper Locke, explained, that relief didn’t last long.

**What they’re saying:** “The fallout from that victory, though, has been the states kind of filling that void,” Conkle said. “We see state laws that are mirroring the federal CARS Rule, and suddenly folks in the industry are faced with this patchwork of state regulatory initiatives.”

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And according to Chris Capurso, associate at Troutman Pepper Locke, it’s unlikely to fade in 2026.

“We haven’t seen the aftershock yet,” Capurso said. “But I think it’s just a matter of time.”

**What’s building underneath:** Capurso added that one of the quieter forces heading into 2026 sits at the intersection of longer loan terms and easing interest rates.

- As he explained, contracts have stretched. Rates have started to come down.
- And that combination puts refinancing back on the table for many consumers, and introduces a different set of compliance requirements for finance companies.

“It’s no longer a sales credit transaction,” he said. “You’re now in a loan transaction, and that’s a different process.”

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“If it’s easier for your customers to get in touch with a regulator than it is to get in touch with you,” Conkle noted, “that’s a problem.”

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"That's a squishy standard," Capurso said. "It's whatever the attorney general thinks it is."

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