

**FILED**

By the Office of the Registrar of Motor Dealers  
on September 8, 2025



Investigation File No.: C-24-11-121  
Hearing File No.: H-25-08-002

**UNDERTAKING**

**IN THE MATTER OF THE *MOTOR DEALER ACT*, RSBC 1996, c 316 and the  
*BUSINESS PRACTICES AND CONSUMER PROTECTION ACT*, SBC 2004, c 2**

**BETWEEN:**

Samurai Automotive Ltd.  
dba White Rock Chrysler Dodge Jeep Ram  
(DL# 40754)

(the "Respondent")

**AND:**

The Registrar of Motor Dealers

**WHEREAS:**

1. The Respondent is a Motor Dealer as defined in the *Motor Dealer Act* (the "**MDA**"), incorporated in accordance with the laws of British Columbia under the name Samurai Automotive Ltd. dba White Rock Chrysler Dodge Jeep Ram and registered with the Vehicle Sales Authority of B.C. (the "**VSA**") under Motor Dealer License No. 40754.
2. The Registrar of Motor Dealers is the Registrar as defined in the MDA, (the "**Registrar**"), and is responsible for the administration and enforcement of the MDA, its regulations, and the prescribed provisions of the *Business Practices and Consumer Protection Act* (the "**BPCPA**").
3. The Respondent was the subject of an investigation launched by the VSA in response to a complaint made by consumers David and Jenny Poitras (the "**Poitras**"). The consumer complaint and investigation findings are outlined in VSA File No. C-24-11-121 and the investigation report of VSA Investigations Officer, Sean Plecas, dated July 23, 2025.

**AND WHEREAS:**

4. On November 8, 2024, the VSA received a consumer complaint from the Poitras concerning the purchase of a 2024 Dodge Durango (the "**Poitras Complaint**").
5. The VSA investigated the Poitras Complaint and closed it on July 23, 2025, finding it to be outside of the VSA's jurisdiction.
6. During the course of the investigation, the VSA wrote emails to the Respondent, requesting they provide information pertaining to the Poitras Complaint pursuant to section 25(1) of the MDA, on the following dates:
  - a. December 17, 2024;
  - b. December 26, 2024;

- c. January 10, 2025;
- d. February 7, 2025;
- e. May 1, 2025; and,
- f. May 6, 2025.

- 7. The Respondent did not provide information respecting the Poitras Complaint following the above-dated requests.
- 8. The Registrar asserts that the Respondent has contravened the following legislation:
  - a. Section 25(1) of the MDA, for failure to provide to the Registrar, following receipt of a complaint in respect of a motor dealer, the information respecting the matter complained of that the Registrar requests in writing.

**NOW THEREFORE** the Respondent undertakes, acknowledges, and agrees with the Registrar:

- 1. To comply with the MDA, MDAR, BPCPA, and the sections thereunder;
- 2. To pay an Administrative Penalty in the amount of **\$30,000.00** in relation to the subject matter of this Undertaking as per the Notice of Administrative Penalty which will be provided to the Respondent upon receipt of the fully executed and filed Undertaking;
- 3. To reimburse the Registrar a total of **\$1,085.86** representing 100% of the investigation costs incurred to date in relation to the subject matter of this Undertaking within thirty (30) days of the Registrar signing this Undertaking;
- 4. That this Undertaking is binding on the Respondent until such time as it is either terminated in writing by the Registrar or terminated by Order of the Supreme Court of British Columbia;
- 5. That in addition to rendering the Respondent liable to further penalties and proceedings as provided for under the BPCPA, it is an offense under the BPCPA to fail to comply with any part of this Undertaking that has not been previously terminated;
- 6. That the Registrar may, upon breach of any part of this Undertaking by the Respondent, declare the Undertaking to be at an end and may institute such proceedings and take such action under the BPCPA, or the Act as considered necessary; and
- 7. That any communication with the Registrar in connection with this Undertaking shall be made to the following address:

Registrar of Motor Dealers  
Vehicle Sales Authority of B.C.  
#280 – 8029 199<sup>th</sup> Street  
Langley, BC V2Y 0E2

And in the case of the Respondent Motor Dealer, to the following address:

White Rock Chrysler Dodge Jeep Ram  
7-3050 King George Blvd.  
Surrey, B.C. V4P 1A2

unless another address for delivery is given to the other party, in writing, by either the Registrar or the Motor Dealer.

The Respondent acknowledges and warrants that they have had an opportunity to seek legal advice as to the terms of this Undertaking.

SAMURAI AUTOMOTIVE LTD. dba WHITE  
ROCK CHRYSLER DODGE JEEP RAM (MOTOR  
DEALER# 40754)



Graeme Spink

Name of Authorized Signatory

ACCEPTED by the Registrar of Motor Dealers this  
19<sup>th</sup> day of August 2025.

8

19<sup>th</sup> September

"Original signed"



Patrick Poyner  
Registrar of Motor Dealers