

# Chapter I

## Security Interest Perfection

### Introduction

Security interests are the only types of liens that may be recorded on Oregon titles and Oregon title records.

Perfection creates a public record so persons such as the debtor's creditors have a means of knowing of the existence of a security interest.

Timely perfection may give the security interest holder certain priority rights when there are disputes or the debtor files for bankruptcy. This chapter does not deal with these or similar issues such as who has priority and what is considered timely perfection. THESE ISSUES DO NOT FALL WITHIN THE JURISDICTION OF DMV. THIS CHAPTER ONLY ADDRESSES PROCEDURAL PROCESSES BY WHICH SECURITY INTERESTS MAY BE RECORDED WITH DMV.

Oregon law provides for perfection of security interests in vehicles by making application for notation of a security interest on the Oregon title within 30 days of the date of sale. This only applies to vehicles that are subject to title, and does not include interests in vehicles that are part of a dealer's inventory. Perfection of security interest is covered in more detail under [ORS 803.097](#), and Oregon Administrative Rules ([OAR 735-020-0020 through 020-0030](#)).

To perfect a security interest in a timely manner, an application must be received by DMV within 30 days of the date of sale. Requirements for perfection are met on the date DMV receives the application if the application includes:

- VIN;
- Name of each owner;
- Name and address of the security interest holder;
- The primary ownership document (MCO, title, etc.). For vehicles built in multiple stages, the ownership documents must cover each stage of manufacture.

In most cases, you should use an Oregon title application when making application for perfection. If you use some other written form (such as a letter stating the purpose for submitting the documents or a TOD), you need to state that you are submitting the information and documents for the purpose of perfecting a security interest.

The "primary ownership document" is the document that must be submitted as the ownership document. This is the main ownership document that is required to obtain title. In most cases, the primary ownership document is the previous title for a used vehicle or the MCO for a new vehicle.

Other documents may be considered the primary ownership document in some cases. For example, if an Oregon title is lost, a properly completed application for replacement title and transfer is acceptable if the vehicle is NOT subject to federal odometer requirements. If a vehicle is sold under some type of operation of law, then lien foreclosure papers, a

*A security interest is defined under ORS 801.465 to mean "...an interest in a vehicle reserved or created by agreement and which secures payment or performance of an obligation as more particularly defined by ORS 71.2010 (2)(ii)."*

certificate of sale or a court order may be acceptable as the primary ownership document. When the primary ownership document is available, the only way to perfect interest is by submitting that document along with the other requirements for perfection within 30 days of the date of sale. When these requirements for perfection are submitted:

- All requirements and fees for title should be submitted with the application, or
- If you have the requirements for perfection but are missing the requirements for title (i.e., missing releases, signatures, powers of attorney, and odometer disclosure), all requirements and fees available should be submitted with the application for perfection. DMV will hold the incomplete application until title requirements are met. When you submit the additional requirements, you need to indicate that documents were previously submitted, when and where they were submitted and the name(s) on the application.

If the primary ownership document is not available, application for perfection may still be made using a Transitional Ownership Document (TOD) which **MUST** be accompanied by a \$13 fee. Following is more information about the TOD.

## **Purpose/limitations on use**

The use of the TOD is restricted to those situations where the primary ownership document is not available to submit to DMV. The TOD may only be used when the selling dealer, new security interest holder or their agent:

- Does not have possession of the primary ownership document, and
- To the best of their knowledge will not have possession of the document within 30 calendar days of the date of sale, or if no sale, within 30 calendar days from the date of the security agreement or contract.

The TOD must be received within 30 days from the date of sale, or if no sale, the date of the security agreement or contract. To determine the 30 days, exclude the first day (i.e., date of sale) and count each calendar day thereafter. If the 30th day falls on a weekend, holiday or mandatory closure day, it is not counted. The last date the TOD will be acceptable is bumped to the next DMV working day.

A properly completed TOD, accompanied by the \$13 fee, meets all the requirements for perfection. The form contains space for the required information.

The TOD is acceptable as an “ownership document” on a transitional basis for the purposes of perfection of a security interest while the primary ownership document is being obtained. Use of a TOD will allow perfection of a security interest to occur sooner, since you will not have to wait until the primary ownership document is available. The TOD **MUST** be accompanied by a \$13 fee or will otherwise be invalid.

## **Submission of primary ownership document required**

When a TOD is used to determine the date of security interest perfection, the primary ownership document must be received by DMV within **90** calendar days from the date of sale, or if no sale, within 90 calendar days from the date of the security agreement or contract. Although DMV allows 90 days to submit the primary ownership document, after 30 days from the date of sale or security agreement/contract the transaction is still subject

to late presentation fees (does not apply if an Oregon dealer submits the transaction). To determine the 90-day period, exclude the first day (i.e., day of sale) and count each calendar day thereafter.

If the 90th day falls on a weekend, holiday or mandatory closure day, the last date the TOD may be used to determine date of security interest perfection is bumped to the next DMV working day. If the primary ownership document is not received within 90 days, the TOD is invalidated and the TOD fee WILL NOT be refunded. If the TOD is invalid, the date used to determine security interest perfection is the date the primary ownership document is received by DMV.

## Date requirements for perfection are considered met

Requirements for perfection shall be considered to have been met on the date DMV receives the TOD, unless DMV invalidates the TOD. A TOD is considered received by DMV when it is:

- Submitted to any local DMV office.
- Mailed (date received by DMV will be used) to DMV headquarters, Attention: TOD Desk, 1905 Lana Avenue N.E., Salem, Oregon 97314-2252.
- Submitted to DMV by facsimile machine (FAX). The FAX telephone number is (503) 945-5143. In order to submit a TOD by FAX, the person or firm MUST have a TOD billing account with DMV so the fees can be billed to that account. For information in obtaining a TOD Billing Account, call ODOT Finance at (503) 986-3960.

## TOD may be invalidated

All owners on a TOD and Application for Title must be identical or the TOD will be invalidated. A TOD may also be invalidated when it is determined that the TOD does not contain all required information, if it contains a false certification, if the person shown *on* the TOD does not have a security interest or if the TOD is received by DMV more than 30 days from the date of the sale.

*A TOD will be invalidated if the primary ownership document is not received within 90 days of the date of sale.*

The TOD will also be invalidated if it is received without the TOD fee or if it is FAXED and the person or firm does not have a TOD billing account.

When submitting a TOD by FAX, write your TOD Billing Account Number on the TOD. If you have a record inquiry account with DMV, it cannot be used for this purpose.

A monthly invoice will be sent to each TOD account holder. If the TOD Billing Account Number written on the TOD is invalid or delinquent, the TOD will be invalidated. The only billing allowed against the TOD Billing Account will be TOD filing fees.

When a TOD is invalidated, any perfection based on the TOD is also invalidated. The fee **WILL NOT** be refunded for an invalidated TOD. If the TOD is invalidated, requirements for perfection will be considered met on the date DMV first receives the primary ownership document and application for notation, (i.e., title application containing name of each owner, name, and address of security interest holder and VIN).

## TOD form

The TOD is a three-page form ([Form 227](#)). The first page is the TOD. The second page (yellow) may be submitted with the TOD if you want a receipt. If you would like the second page mailed back to you, please include your return address in the space provided.

The third page (pink) is to be submitted along with the primary ownership document when it is submitted. The third page may also be used to withdraw a TOD. (TOD withdrawals are discussed later in this chapter.)

The TOD form contains more detailed instructions on its use.

DMV will accept a reproduction of a TOD form. If you use a copy, make sure you copy the first (top) page, not the receipt or withdrawal page.

## Accuracy in completing form important

Accuracy in completing TOD forms is important. Perfection involves creating a public record. If the information required is inaccurate, this could invalidate the perfection.

Persons completing TODs should initial any changes or alterations made to the information before submitting the TOD to DMV. If this is not done, the TOD will be invalidated or rejected by DMV. Changes or alterations to TODs will not be accepted once DMV has marked a TOD as received. If you have a need to change information on a form after that date (and there is still time to get it to DMV within the 30-day time limitation), you may submit another TOD along with another \$13 fee and withdraw the first TOD submitted. However, if you submit another TOD, the date used for determining perfection will be the date the second TOD is received.

## Submitting a TOD

If you determine you need to use a TOD, complete the form and submit it to DMV with a fee of \$13.

TODs, and any transactions for which a TOD has been submitted, should be kept separate from any other title and registration applications you may be submitting. One check should be submitted for TODs and one check for any other title and registration documents.

If a number of TODs are submitted and the check contains insufficient fees to cover all the TODs received, the fees will be applied to as many TODs as possible and all others will be invalidated. DMV will apply the fees to the documents in order of processing and will not try to determine which TOD is more important.

If the TODs are submitted with other documents and the check contains insufficient fees to cover all TODs and all documents, the money will be applied to the TODs first and as many documents as possible thereafter. Some other transaction(s) may have insufficient fees.

If you need a receipt, follow the instructions for completion and submission of the receipt copy, and send this with the TOD. If you are sending the TOD by FAX and need a receipt,

*To set up a TOD account for submitting TODs by FAX, contact the ODOT Finance Section at (503) 986-3960.*

write “receipt requested” at the very top of the TOD form. DO NOT send the receipt copy (part 2) of the TOD form by FAX.

Keep the third part of the TOD form until you are ready to submit the primary ownership document, or need to withdraw the TOD.

When the primary ownership document is available, submit that document to DMV along with the third part of the TOD form. (You will need to place the third copy on top of the transaction.) You need to submit Page 3 so DMV can connect the primary ownership document with the TOD. However, when you submit this part of the TOD, DO NOT COMPLETE OR SIGN THE WITHDRAWAL PORTION **unless** you intend to withdraw the TOD that was previously submitted.

When you submit Page 3 of the TOD with the primary ownership document, you should also submit any necessary title or registration requirements and fees. DMV will accept the primary ownership document without all the requirements for the purpose of perfection.

*TOD date charts are included in this Chapter and are also on the DMV Web site at*

*<https://www.oregon.gov/ODOT/DMV/Pages/Dealers/Dealers-Home.aspx>*

However, the title will not be issued until all title requirements are met.

Remember, to perfect interest based on the TOD, DMV must receive the primary ownership document within 90 calendar days of the date of sale, or if no sale, within 90 calendar days of the date of the security agreement or contract.

When submitting the primary ownership document where a TOD has previously been submitted, keep that transaction separate from other title and registration transactions you may be submitting, and TODs not previously submitted. If you are submitting more than one primary ownership document for TODs that have been submitted, these documents may be grouped together.

It is important that the primary ownership document be joined with the TOD as soon as possible. This may not occur if such documents are not kept separate from routine title and registration business or if you do not provide the third part of the TOD so the documents can be connected.

## Withdrawal of TOD

The third part of the TOD form may be used for withdrawing a TOD that has been submitted to DMV. There are instructions on the form. Withdrawal notices must be in writing. The notice may be submitted to a local DMV office or mailed to DMV headquarters. Withdrawal notices may be sent by facsimile machine (FAX) when they are not required to be attached to title transactions. When the mail or FAX is used for sending a withdrawal, use the same mailing address or FAX telephone number as used for sending a TOD.

*There is NO REFUND of the TOD fee when a TOD is withdrawn.*

DO NOT SIGN Page 3 of the TOD unless you intend to withdraw the previously submitted TOD.

There are certain situations under which you **must** submit a withdrawal notice:

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- A second TOD for the same vehicle may be submitted under certain circumstances such as, the first one received was incorrect or the vehicle has been sold since the first TOD was submitted. If a second TOD is being submitted for the same vehicle, a withdrawal notice must be submitted for the first TOD. This should accompany the second TOD, and may be submitted to a local DMV office, or mailed or sent by FAX to DMV headquarters.
- If a title will be applied for within 90 calendar days from the date of sale or, if no sale, the date of security agreement or contract (as reflected on the TOD submitted) and the interests shown on the title application conflict with the ones shown on the TOD, the security interest holder or person who submitted the TOD must submit a withdrawal notice. An example is where the TOD reflects a different registered owner than what will be shown on the application for title.
- The title could potentially be applied for by someone else within the 90 day time period, such as where the primary ownership documents have been released to a third party (i.e., a new buyer).


When submitting the title transaction to DMV, the withdrawal notice should be attached to that transaction. Keep the title transaction separate from other title and registration transactions that do not involve TODs.

If the primary ownership documents have been released to a third party, the security interest holder or person who submitted the TOD should send the withdrawal notice directly to DMV (i.e., local office, mail, or FAX).



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**Example of TRANSITIONAL OWNERSHIP DOCUMENT, FORM 227**  
 Actual size 8½" x 11"  
 (first page)

		<h2 style="margin: 0;">TRANSITIONAL OWNERSHIP DOCUMENT (TOD)</h2>	
This document is for use in perfecting security interests in vehicles. The document:			
a. <b>May not be used if the primary ownership document (i.e. title, Manufacturer's Certificate of Origin) is available.</b> b. Is not a <b>negotiable</b> document and is <b>not evidence of ownership or right to title.</b> c. Is only valid when in the possession of DMV. d. Is only valid if properly completed and <b>received</b> by DMV within <b>30 calendar days</b> of the date of sale or date of security agreement/contract, along with a \$13.00 fee, and only if DMV receives the primary ownership document within <b>90 calendar days</b> of the date of sale or security agreement/contract. (In determining days, do not count the actual day of sale or day the contract was signed.)			
<b>Please see reverse for instructions on completing this form.</b>			
<b>SECTION A</b>			
1	DATE OF SALE OR DATE SECURITY AGREEMENT/CONTRACT WAS SIGNED	YEAR	MAKE
			BODY STYLE
2	PLATE NUMBER	VEHICLE IDENTIFICATION NUMBER	OREGON TITLE NUMBER
3	NAME OF OWNER		ODL / ID / CUSTOMER NUMBER
			DATE OF BIRTH
4	NAME OF OWNER		ODL / ID / CUSTOMER NUMBER
			DATE OF BIRTH
5	NAME OF OWNER		ODL / ID / CUSTOMER NUMBER
			DATE OF BIRTH
6	OWNERS RESIDENCE ADDRESS (HOUSE NUMBER, STREET)		CITY, STATE, ZIP CODE
7	SECURITY INTEREST HOLDER		ODL / CUSTOMER NUMBER
			DATE OF BIRTH
8	SECURITY INTEREST HOLDER ADDRESS (STREET, CITY, STATE, ZIP CODE)		
9	SECONDARY SECURITY INTEREST HOLDER/LESSOR		ODL / CUSTOMER NUMBER
			DATE OF BIRTH
10	SECONDARY SECURITY INTEREST HOLDER/LESSOR ADDRESS (STREET, CITY, STATE, ZIP CODE)		
<b>SECTION B</b>			
I hereby certify that:			
1. The information on this document is accurate. 2. The primary ownership document is <b>not</b> in my <b>possession</b> and is not available for submission to DMV. 3. The primary ownership document is being obtained and I understand that document must be <b>received</b> by DMV within <b>90 calendar days</b> of the date of sale or security agreement/contract, or this document and any perfection based on this document shall be <b>invalidated</b> .			
I understand that false certification may invalidate this document for the purpose of perfection of a security interest.			
11	NAME OF BUSINESS OR INDIVIDUAL SUBMITTING DOCUMENT	DEALER NUMBER	TELEPHONE NUMBER
12	SIGNATURE	TOD ACCOUNT NUMBER	DATE
	X		
<b>OFFICE USE ONLY</b>			
<input type="checkbox"/> DLR <input type="checkbox"/> BNK <input type="checkbox"/> FIN <input type="checkbox"/> CRU <input type="checkbox"/> PRI <input type="checkbox"/> _____		DLR <input type="checkbox"/> YES <input type="checkbox"/> NO	
INVALIDATION DATE:		RECEIPT DATE	
BY _____		FEE COLLECTED: \$	
<input type="checkbox"/> VIN <input type="checkbox"/> 30D <input type="checkbox"/> 90D <input type="checkbox"/> _____		MVR INITIALS:	
<input type="checkbox"/> FEE <input type="checkbox"/> INC <input type="checkbox"/> CON <input type="checkbox"/> SEC			
735-227 (8-16)		PAGE 1	
		STK# 300099	

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**Example of TRANSITIONAL OWNERSHIP DOCUMENT, FORM 227**

*Actual size 8½" x 11"  
 (second page - Receipt)*


		<b>RECEIPT OF TRANSITIONAL OWNERSHIP DOCUMENT ONLY (NOT VALID AS A TOD)</b>	
<b>Instructions:</b>			
1. This part is to be used as a receipt. If the document is presented at a local DMV office, a receipt date will be stamped on the document and returned to you.			
2. If the document is sent in by mail, <b>TYPE or CLEARLY PRINT</b> a name and address in the space provided at the bottom of this form, and this part will be returned as a receipt. If the space is not completed with a name and address, a receipt will not be sent to you.			
3. "Receipt Requested" and provide your FAX number in the box at the bottom of this page. A receipt will be returned to you by FAX.			
1	DATE OF SALE OR DATE SECURITY AGREEMENT/CONTRACT WAS SIGNED	YEAR	MAKE
2	PLATE NUMBER	VEHICLE IDENTIFICATION NUMBER	OREGON TITLE NUMBER
3	NAME OF OWNER	ODL / ID / CUSTOMER NUMBER	DATE OF BIRTH
4	NAME OF OWNER	ODL / ID / CUSTOMER NUMBER	DATE OF BIRTH
5	NAME OF OWNER	ODL / ID / CUSTOMER NUMBER	DATE OF BIRTH
6	OWNERS RESIDENCE ADDRESS (HOUSE NUMBER, STREET)	CITY, STATE, ZIP CODE	
7	SECURITY INTEREST HOLDER	ODL / CUSTOMER NUMBER	DATE OF BIRTH
8	SECURITY INTEREST HOLDER ADDRESS (STREET, CITY, STATE, ZIP CODE)		
9	SECONDARY SECURITY INTEREST HOLDER/LESSOR	ODL / CUSTOMER NUMBER	DATE OF BIRTH
10	SECONDARY SECURITY INTEREST HOLDER/LESSOR ADDRESS (STREET, CITY, STATE, ZIP CODE)		
<input type="checkbox"/> <b>APPROVED</b>			
<input type="checkbox"/> <b>INVALID</b>			
<input type="checkbox"/> The TOD was not received within thirty (30) days from the date of sale or from the date the security agreement/contract was signed.			
<input type="checkbox"/> The vehicle identification number (VIN) on the TOD does not match the VIN on either the primary ownership document or DMV vehicle records.			
<input type="checkbox"/> The TOD submitted was incomplete.			
<input type="checkbox"/> Other: _____			
PLEASE MAIL OR FAX RECEIPT TO: (NAME & ADDRESS OR FAX # MUST BE TYPED OR CLEARLY PRINTED IN BOX BELOW)			NOT VALID AS A RECEIPT UNLESS DATE STAMPED BY DMV
_____ _____ _____ _____			<b>RECEIPT DATE</b>



**Example of TRANSITIONAL OWNERSHIP DOCUMENT, FORM 227**

Actual size 8½" x 11"

(third page – Request to Withdraw)

 <p style="text-align: center;"><b>NOTICE OF TRANSITIONAL OWNERSHIP DOCUMENT PREVIOUSLY SUBMITTED (NOT VALID AS A TOD)</b></p>			
<b>SECTION A</b>			
<b>THIS PAGE MUST BE ATTACHED TO THE PRIMARY OWNERSHIP DOCUMENT WHEN IT IS SUBMITTED TO DMV, EITHER AT A LOCAL DMV OFFICE OR BY MAIL.</b>			
1	DATE OF SALE OR DATE SECURITY AGREEMENT/CONTRACT WAS SIGNED	YEAR	MAKE
2	PLATE NUMBER	VEHICLE IDENTIFICATION NUMBER	OREGON TITLE NUMBER
3	NAME OF OWNER	ODL / ID / CUSTOMER NUMBER	DATE OF BIRTH
4	NAME OF OWNER	ODL / ID / CUSTOMER NUMBER	DATE OF BIRTH
5	NAME OF OWNER	ODL / ID / CUSTOMER NUMBER	DATE OF BIRTH
6	OWNERS RESIDENCE ADDRESS (HOUSE NUMBER, STREET)	CITY, STATE, ZIP CODE	
7	SECURITY INTEREST HOLDER	ODL / CUSTOMER NUMBER	DATE OF BIRTH
8	SECURITY INTEREST HOLDER ADDRESS (STREET, CITY, STATE, ZIP CODE)		
9	SECONDARY SECURITY INTEREST HOLDER/LESSOR	ODL / CUSTOMER NUMBER	DATE OF BIRTH
10	SECONDARY SECURITY INTEREST HOLDER/LESSOR ADDRESS (STREET, CITY, STATE, ZIP CODE)		
<b>SECTION B</b>			
<b>REQUEST TO WITHDRAW TOD</b>			
Instructions: 1. Complete this section of the form <b>ONLY</b> when your intention is to have DMV invalidate the TOD. 2. Deliver this page to a DMV office or mail it to: DMV, Attn: TOD Desk, 1905 Lana Ave NE, Salem OR 97314, or send it by facsimile machine (FAX). The FAX number is (503) 945-5143. 3. The TOD fee will be retained even though the TOD is being withdrawn. The fee cannot be used for another TOD.			
<b>I WITHDRAW THE TRANSITIONAL OWNERSHIP DOCUMENT AS NOTED ABOVE. I UNDERSTAND THAT BY WITHDRAWING THE TRANSITIONAL OWNERSHIP DOCUMENT, ANY SECURITY INTEREST PERFECTED ON THE BASIS OF THE DOCUMENT WILL BE INVALIDATED.</b>			
PRINTED NAME OF BUSINESS OR INDIVIDUAL WITHDRAWING TOD			
SIGNATURE OF PERSON WITHDRAWING TOD			DATE
X _____			← SIGN THIS FORM ONLY WHEN YOU ARE WITHDRAWING THE TOD
<b>OFFICE USE ONLY</b>			
<input type="checkbox"/>	ORT	<input type="checkbox"/>	CAN
<input type="checkbox"/>	DUP	<input type="checkbox"/>	FOR
<input type="checkbox"/>	MCO	<input type="checkbox"/>	USM
<input type="checkbox"/>	OUT	<input type="checkbox"/>	OPL
		<input type="checkbox"/>	OTH
			DATE _____

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**2019 TOD DATE CHART**  
**January – April Sale Date**

Jan 19			Feb 19			Mar 19			Apr 19		
Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day
Jan 1	01/31	04/01	Feb 1	03/04	05/02	Mar 1	04/01	05/30	Apr 1	05/01	07/01
Jan 2	02/01	04/02	Feb 2	03/04	05/03	Mar 2	04/01	05/31	Apr 2	05/02	07/01
Jan 3	02/04	04/03	Feb 3	03/05	05/06	Mar 3	04/02	06/03	Apr 3	05/03	07/02
Jan 4	02/04	04/04	Feb 4	03/06	05/06	Mar 4	04/03	06/03	Apr 4	05/06	07/03
Jan 5	02/04	04/05	Feb 5	03/07	05/06	Mar 5	04/04	06/03	Apr 5	05/06	07/05
Jan 6	02/05	04/08	Feb 6	03/08	05/07	Mar 6	04/05	06/04	Apr 6	05/06	07/05
Jan 7	02/06	04/08	Feb 7	03/11	05/08	Mar 7	04/08	06/05	Apr 7	05/07	07/08
Jan 8	02/07	04/08	Feb 8	03/11	05/09	Mar 8	04/08	06/06	Apr 8	05/08	07/08
Jan 9	02/08	04/09	Feb 9	03/11	05/10	Mar 9	04/08	06/07	Apr 9	05/09	07/08
Jan 10	02/11	04/10	Feb 10	03/12	05/13	Mar 10	04/09	06/10	Apr 10	05/10	07/09
Jan 11	02/11	04/11	Feb 11	03/13	05/13	Mar 11	04/10	06/10	Apr 11	05/13	07/10
Jan 12	02/11	04/12	Feb 12	03/14	05/13	Mar 12	04/11	06/10	Apr 12	05/13	07/11
Jan 13	02/12	04/15	Feb 13	03/15	05/14	Mar 13	04/12	06/11	Apr 13	05/13	07/12
Jan 14	02/13	04/15	Feb 14	03/18	05/15	Mar 14	04/15	06/12	Apr 14	05/14	07/15
Jan 15	02/14	04/15	Feb 15	03/18	05/16	Mar 15	04/15	06/13	Apr 15	05/15	07/15
Jan 16	02/15	04/16	Feb 16	03/18	05/17	Mar 16	04/15	06/14	Apr 16	05/16	07/15
Jan 17	02/19	04/17	Feb 17	03/19	05/20	Mar 17	04/16	06/17	Apr 17	05/17	07/16
Jan 18	02/19	04/18	Feb 18	03/20	05/20	Mar 18	04/17	06/17	Apr 18	05/20	07/17
Jan 19	02/19	04/19	Feb 19	03/21	05/20	Mar 19	04/18	06/17	Apr 19	05/20	07/18
Jan 20	02/19	04/22	Feb 20	03/22	05/21	Mar 20	04/19	06/18	Apr 20	05/20	07/19
Jan 21	02/20	04/22	Feb 21	03/25	05/22	Mar 21	04/22	06/19	Apr 21	05/21	07/22
Jan 22	02/21	04/22	Feb 22	03/25	05/23	Mar 22	04/22	06/20	Apr 22	05/22	07/22
Jan 23	02/22	04/23	Feb 23	03/25	05/24	Mar 23	04/22	06/21	Apr 23	05/23	07/22
Jan 24	02/25	04/24	Feb 24	03/26	05/28	Mar 24	04/23	06/24	Apr 24	05/24	07/23
Jan 25	02/25	04/25	Feb 25	03/27	05/28	Mar 25	04/24	06/24	Apr 25	05/28	07/24
Jan 26	02/25	04/26	Feb 26	03/28	05/28	Mar 26	04/25	06/24	Apr 26	05/28	07/25
Jan 27	02/26	04/29	Feb 27	03/29	05/28	Mar 27	04/26	06/25	Apr 27	05/28	07/26
Jan 28	02/27	04/29	Feb 28	04/01	05/29	Mar 28	04/29	06/26	Apr 28	05/28	07/29
Jan 29	02/28	04/29				Mar 29	04/29	06/27	Apr 29	05/29	07/29
Jan 30	03/01	04/30				Mar 30	04/29	06/28	Apr 30	05/30	07/29
Jan 31	03/04	05/01				Mar 31	04/30	07/01			

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**2019 TOD DATE CHART**  
**May – August Sale Date**

May 19			Jun 19			Jul 19			Aug 19		
Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day
May 1	06/31	07/30	Jun 1	07/01	08/30	Jul 1	07/31	09/30	Aug 1	09/03	10/30
May 2	06/03	07/31	Jun 2	07/02	09/03	Jul 2	08/01	09/30	Aug 2	09/03	10/31
May 3	06/03	08/01	Jun 3	07/03	09/03	Jul 3	08/02	10/01	Aug 3	09/03	11/01
May 4	06/03	08/02	Jun 4	07/05	09/03	Jul 4	08/05	10/02	Aug 4	09/03	11/04
May 5	06/04	08/05	Jun 5	07/05	09/03	Jul 5	08/05	10/03	Aug 5	09/04	11/04
May 6	06/05	08/05	Jun 6	07/08	09/04	Jul 6	08/05	10/04	Aug 6	09/05	11/04
May 7	06/06	08/05	Jun 7	07/08	09/05	Jul 7	08/06	10/07	Aug 7	09/06	11/05
May 8	06/07	08/06	Jun 8	07/08	09/06	Jul 8	08/07	10/07	Aug 8	09/09	11/06
May 9	06/10	08/07	Jun 9	07/09	09/09	Jul 9	08/08	10/07	Aug 9	09/09	11/07
May 10	06/10	08/08	Jun 10	07/10	09/09	Jul 10	08/09	10/08	Aug 10	09/09	11/08
May 11	06/10	08/09	Jun 11	07/11	09/09	Jul 11	08/12	10/09	Aug 11	09/10	11/12
May 12	06/11	08/12	Jun 12	07/12	09/10	Jul 12	08/12	10/10	Aug 12	09/11	11/12
May 13	06/12	08/12	Jun 13	07/15	09/11	Jul 13	08/12	10/11	Aug 13	09/12	11/12
May 14	06/13	08/12	Jun 14	07/15	09/12	Jul 14	08/13	10/14	Aug 14	09/13	11/12
May 15	06/14	08/13	Jun 15	07/15	09/13	Jul 15	08/14	10/14	Aug 15	09/16	11/13
May 16	06/17	08/14	Jun 16	07/16	09/16	Jul 16	08/15	10/14	Aug 16	09/16	11/14
May 17	06/17	08/15	Jun 17	07/17	09/16	Jul 17	08/16	10/15	Aug 17	09/16	11/15
May 18	06/17	08/16	Jun 18	07/18	09/16	Jul 18	08/19	10/16	Aug 18	09/17	11/18
May 19	06/18	08/19	Jun 19	07/19	09/17	Jul 19	08/19	10/17	Aug 19	09/18	11/18
May 20	06/19	08/19	Jun 20	07/22	09/18	Jul 20	08/19	10/18	Aug 20	09/19	11/18
May 21	06/20	08/19	Jun 21	07/22	09/19	Jul 21	08/20	10/21	Aug 21	09/20	11/19
May 22	06/21	08/20	Jun 22	07/22	09/20	Jul 22	08/21	10/21	Aug 22	09/23	11/20
May 23	06/24	08/21	Jun 23	07/23	09/23	Jul 23	08/22	10/21	Aug 23	09/23	11/21
May 24	06/24	08/22	Jun 24	07/24	09/23	Jul 24	08/23	10/22	Aug 24	09/23	11/22
May 25	06/24	08/23	Jun 25	07/25	09/23	Jul 25	08/26	10/23	Aug 25	09/24	11/25
May 26	06/25	08/26	Jun 26	07/26	09/24	Jul 26	08/26	10/24	Aug 26	09/25	11/25
May 27	06/26	08/26	Jun 27	07/29	09/25	Jul 27	08/26	10/25	Aug 27	09/26	11/25
May 28	06/27	08/26	Jun 28	07/29	09/26	Jul 28	08/27	10/28	Aug 28	09/27	11/26
May 29	06/28	08/27	Jun 29	07/29	09/27	Jul 29	08/28	10/28	Aug 29	09/30	11/27
May 30	07/01	08/28	Jun 30	07/30	09/30	Jul 30	08/29	10/28	Aug 30	09/30	12/02
May 31	07/01	08/29				Jul 31	08/30	10/29	Aug 31	09/30	12/02

DMV TITLE AND REGISTRATION HANDBOOK  
Chapter I: Security Interest Perfection

**2019 TOD DATE CHART**  
**September – December Sale Date**

Sep 19			Oct 19			Nov 19			Dec 19		
Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day	Date of Sale	30th Day	90th Day
Sep 1	10/01	12/02	Oct 1	10/31	12/30	Nov 1	12/02	01/30	Dec 1	12/31	03/02
Sep 2	10/02	12/02	Oct 2	11/01	12/31	Nov 2	12/02	01/31	Dec 2	01/02	03/02
Sep 3	10/03	12/02	Oct 3	11/04	01/02	Nov 3	12/03	02/03	Dec 3	01/02	03/02
Sep 4	10/04	12/03	Oct 4	11/04	01/02	Nov 4	12/04	02/03	Dec 4	01/03	03/03
Sep 5	10/07	12/04	Oct 5	11/04	01/03	Nov 5	12/05	02/03	Dec 5	01/06	03/04
Sep 6	10/07	12/05	Oct 6	11/05	01/06	Nov 6	12/06	02/04	Dec 6	01/06	03/05
Sep 7	10/07	12/06	Oct 7	11/06	01/06	Nov 7	12/09	02/05	Dec 7	01/06	03/06
Sep 8	10/08	12/09	Oct 8	11/07	01/06	Nov 8	12/09	02/06	Dec 8	01/07	03/09
Sep 9	10/09	12/09	Oct 9	11/08	01/07	Nov 9	12/09	02/07	Dec 9	01/08	03/09
Sep 10	10/10	12/09	Oct 10	11/12	01/08	Nov 10	12/10	02/10	Dec 10	01/09	03/09
Sep 11	10/11	12/10	Oct 11	11/12	01/09	Nov 11	12/11	02/10	Dec 11	01/10	03/10
Sep 12	10/14	12/11	Oct 12	11/12	01/10	Nov 12	12/12	02/10	Dec 12	01/13	03/11
Sep 13	10/14	12/12	Oct 13	11/12	01/13	Nov 13	12/13	02/11	Dec 13	01/13	03/12
Sep 14	10/14	12/13	Oct 14	11/13	01/13	Nov 14	12/16	02/12	Dec 14	01/13	03/13
Sep 15	10/15	12/16	Oct 15	11/14	01/13	Nov 15	12/16	02/13	Dec 15	01/14	03/16
Sep 16	10/16	12/16	Oct 16	11/15	01/14	Nov 16	12/16	02/14	Dec 16	01/15	03/16
Sep 17	10/17	12/16	Oct 17	11/18	01/15	Nov 17	12/17	02/18	Dec 17	01/16	03/16
Sep 18	10/18	12/17	Oct 18	11/18	01/16	Nov 18	12/18	02/18	Dec 18	01/17	03/17
Sep 19	10/21	12/18	Oct 19	11/18	01/17	Nov 19	12/19	02/18	Dec 19	01/21	03/18
Sep 20	10/21	12/19	Oct 20	11/19	01/21	Nov 20	12/20	02/18	Dec 20	01/21	03/19
Sep 21	10/21	12/20	Oct 21	11/20	01/21	Nov 21	12/23	02/19	Dec 21	01/21	03/20
Sep 22	10/22	12/23	Oct 22	11/21	01/21	Nov 22	12/23	02/20	Dec 22	01/21	03/23
Sep 23	10/23	12/23	Oct 23	11/22	01/21	Nov 23	12/23	02/21	Dec 23	01/22	03/23
Sep 24	10/24	12/23	Oct 24	11/25	01/22	Nov 24	12/24	02/24	Dec 24	01/23	03/23
Sep 25	10/25	12/24	Oct 25	11/25	01/23	Nov 25	12/26	02/24	Dec 25	01/24	03/24
Sep 26	10/28	12/26	Oct 26	11/25	01/24	Nov 26	12/26	02/24	Dec 26	01/27	03/25
Sep 27	10/28	12/26	Oct 27	11/26	01/27	Nov 27	12/27	02/25	Dec 27	01/27	03/26
Sep 28	10/28	12/27	Oct 28	11/27	01/27	Nov 28	12/30	02/26	Dec 28	01/27	03/27
Sep 29	10/29	12/30	Oct 29	12/02	01/27	Nov 29	12/30	02/27	Dec 29	01/28	03/30
Sep 30	10/30	12/30	Oct 30	12/02	01/28	Nov 30	12/30	02/28	Dec 30	01/29	03/30
			Oct 31	12/02	01/29				Dec 31	01/30	03/30