



State Board of Towing  
February 14, 2025  
Complaint Review

- The Oregon State Board of Towing reviews all submitted complaints.
- Complaints demonstrating possible violations of the Oregon laws assigned to the Board will be reviewed for compliance and violations.
- Complaints alleging unlawful or wrongful conduct outside of the scope of the Board will be referred to the appropriate authority; complaint information will be tracked and reviewed.
- The Board does not adjudicate civil disputes or criminal conduct/actions/behavior.
- Complaints may be deferred for investigation at a later date.

| <i>Nature of Complaint</i>   | <i>Determination</i>  |
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| <b><u>Authorization/Validity of the tow:</u></b><br><i>Non-preference and rotational tows<br/>(OSP, ODOT, other law enforcement and<br/>government agencies)</i> | <ul style="list-style-type: none"><li>• The Board does not contest or dispute the validity of tows authorized by law enforcement or government agency.</li><li>• Complainant will be referred to the appropriate agency with information re: the right to a hearing to contest the validity of the tow.</li><li>• <i>Other:</i></li></ul> |
| <b><u>Authorization/Validity of the tow:</u></b><br><i>Private Property Impounds</i>   | <ul style="list-style-type: none"><li>• An authorization (reasonably) showing the description of vehicle and vehicle location prior to the tow OR notice posted on vehicle for more than 72 hours: tower in compliance; closed, no violation.</li><li>• Towed with an authorization not reasonably authorizing the tow prior to</li></ul> |

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|   | <p>hook up of the vehicle to be towed. Investigation, Board review required.</p> <ul style="list-style-type: none"> <li>No signed authorization, but vehicle towed with all requirements of - ORS 98.853 (1) (d) are met, Board review required before closing file.</li> <li>No authorization, vehicle towed for reasons other than exceptions under ORS 98.853 (1): investigation, Board review required.</li> </ul> |
| <p><b><u>Tow invoices and fee disputes:</u></b><br/> <i>Non-preference and rotational tows (OSP, ODOT, other law enforcement and government agencies)</i></p> <p><i>Are towing services rendered accurately reflected on invoice?</i></p> | <ul style="list-style-type: none"> <li>Complainant referred to the authorizing agency.</li> <li>Other:</li> </ul>  |
| <p><b><u>Tow invoices and fee disputes:</u></b><br/> <i>Private property impounds – county or city maximum rates established.</i></p> <p><i>Are towing services rendered accurately reflected on invoice?</i></p>                         | <ul style="list-style-type: none"> <li>Complainant referred to the appropriate authority for review.</li> <li>Other:</li> </ul>  |
| <p><b><u>Tow invoices and fee disputes:</u></b><br/> <i>Private property impounds – no county or city maximum rates established.</i></p> <p><i>Are towing services rendered accurately reflected on invoice?</i></p>                      | <ul style="list-style-type: none"> <li>Board staff will conduct audit or review of invoice; board review required.</li> <li>Other:</li> </ul>  |
| <p><b><u>Failure to provide required documents:</u></b><br/> <i>Failure to timely provide signed authorization, pre-tow photos, written statement of fees and charges when requested.</i></p>   | <ul style="list-style-type: none"> <li>Investigation.</li> <li>Other:</li> </ul>   |

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| <b><u>Damages incurred during tow:</u></b>                     | <ul style="list-style-type: none"> <li>• Civil action</li> <li>• Board tracks complaints and data.</li> <li>• Other:</li> </ul>   |
| <b><u>Tower or tower's employee's behavior or conduct.</u></b> | <ul style="list-style-type: none"> <li>• Civil action.</li> <li>• Refer to law enforcement if alleged behavior is criminal, threatening, or harassing in nature.</li> </ul>   |
| <b><u>Signage:</u></b>   | <ul style="list-style-type: none"> <li>• Tows completed without signage, reasonably under a signed authorization from property owner or agent (Board direction):</li> <li>• Tows completed without signage, no signed authorization from property owner or agent: Board investigation.</li> </ul> <p>OR:<br/>Hold all complaints alleging signage violations until after public work session.</p> |
| <b><u>Possessory Liens:</u></b>                                | Forward to DMV vehicle services for review before opening an investigation.   |

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| <p><b><u>Vehicle registration or equipment – excepting operating a tow vehicle for compensation without TW plate and tow business certificate complaints:</u></b><br/> <i>Oregon registration requirements, ODOT and USDOT registration number requirements, vehicle weights, equipment requirements, etc.</i></p> | <p>Refer complainant to appropriate federal, state, or local authority charged with enforcement.</p>  |
| <p><b><u>Operating without a TW plate and tow business certificate:</u></b></p>  | <ol style="list-style-type: none"> <li>1. Review of complaint information to confirm grounds for investigation through official or public records.</li> <li>2. Write informational letter to owner and registered agent.</li> <li>3. Determination of compliance or required action.</li> </ol>   |
| <p><b><u>Owner access to vehicle/possessions:</u></b></p>  | <ol style="list-style-type: none"> <li>1. Staff assistance in confirming lawful ownership to assist consumer with possible options, explain legal requirements for possessions and access to vehicle owner.</li> <li>2. Contact tower if there is a possible violation.</li> <li>3. Board will track and review complaints for possible resolution via legislation or collaborative partners.</li> <li>4. Other:</li> </ol> |
| <p><b><u>Collections:</u></b></p>  | <ol style="list-style-type: none"> <li>1. Assist consumer with ownership information if available, refer to appropriate DMV authority.</li> <li>2. Hold collection complaints until after public work session.</li> </ol>   |
| <p><b><u>Repossessions:</u></b></p>  | <p>Hold repo complaints until after public work session.</p>  |