
Oregon State Board of Towing



Compliance Report

To: Oregon State Board of Towing Board Members

From: Torey McCullough, Board Administrator

Date: June 9, 2026

Disciplinary Action updates:

- Attached is a summary and current status of the disciplinary actions issued by the Board in 2026.
- The Board is forwarding its first past due account to the Dept. of Revenue for collections. Collection fees (approximately 19% of the unpaid balance) are paid by the debtor.

Complaints and Investigations:

- Board staff continues to process the backlog of complaints for substantiated violations or demonstrating a tower's compliance with the statutes existing at the time of the tow.
- Each investigation takes approximately 2 – 10 hours to document and complete. The process is helped or hampered by the level of cooperation of the tower.
- Complaints when the tower is able to substantiate compliance or where no violations subject to the Board are closed, and available for Board review at the next meeting. There are a small number of towers who may be in compliance, but are providing the documentation or cooperating with the Board's investigation.
- Attached is a summary of the correspondence and inquiries received by the Board since the May work session.
- There are approximately 87 open cases in various stages of investigations at this time.
- Filevine is being used increasingly as a depository of documents and information from both the towers and the complainants.

Trends:

- Complaints and inquiries substantiating private property impound violations have fallen from approximately 20-25 probable violations a week a year ago to one or two possible violations a week. This is mainly due to the surrender of tow plates from one company, the removal of the exemptions allowing identification of towing business by tow companies through patrol towing, and compliance education and outreach with the towing industry.
- The increased use of AI in writing complaints has significantly increased staff workload and significantly reduced available investigation time. Staff is working with other agencies in streamlining processing and responses to AI generated complaints and inquiries for efficiencies and best use of board resources.
- Tow business certificates. There still remains some confusion of the requirements of the tow business certificate acting as Oregon's certificate authorization for a business to operate a tow or recovery business. Compliance has increased. Law enforcement agencies are contacting the Towing Board for more information and collaborative efforts.

Agenda Item 6.b. Status Reports
Settlement Conference
Requests

Complaint No.	Type of Tow	Allegations	Allegation 2	Board Discussion	Board Action	Status
2025-01-010	Roadside	Operating without a tow business certificate.				Stipulated Agreement and Final Order for review.
2025-12-003	PPI	Unethical billing practices	Failure to comply with PPI requirements			Stipulated Agreement and Final Order for review.
COMPLAINTS						
05.05.2026 Work Session						
Complaint No.	Type of Tow	Allegations	Allegation 2	Board Discussion	Board Action	Status
2026-01-006	PPI	Unlawful/Unauthorized Tow	Fees	Complaint alleges tower towed three vehicles without authorization, violation of maximum rates established by city.	Issue a NOPA for \$250, failure to obtain signed authorization.	Final Order pending. Civil penalties paid in full.
2025-07-011	PPI	Unauthorized tow	No signs	Complaint alleges vehicles parked with permission, signs not posted.	Close - no violation of Board laws found, letter of education re: condition of signs.	Closure letters sent 06.03.2026
2025-10-013	PPI	Unauthorized tow	failure to return possessions	Vehicles removed as part of eviction process.	Close - no violation of Board laws found.	Closure letters sent 06.03.2026
2025-11-005	PPI	Failure to file lien on time	Excess storage charges	Utility trailer left on county property; allegations that the notice of lien was sent late.	Close - no violation of Board laws found, letter of education re: condition of signs.	Closure letters sent 06.03.2026
2026-04-009	PPI	Unauthorized tow	failure to return possessions	Vehicles removed as part of eviction process.	Close - no violation of Board laws found.	Closure letters sent 06.03.2026

2026-01-010	LEA	Unlawful/Unauthorized Tow		Vehicles impounded by LEA, hearing held. TBC/vehicle registration corrected upon initial contact by Board.	Close - no violation of Board laws found.	Closure letters sent 06.03.2026
2026-02-004	PPI	Towing without a signed authorization		Complainant alleges the vehicle had permission to park. Lender authorized the tow, but the vehicle was removed without proper authorization by a 2nd tow company. 2nd tow company refused to release vehicle.	Issue a NOPA for \$2000 for violations of ORS 98.853 and 98.854, no photos, no 72 hour notice, no signed authorization, no written statement of fees, no Notice of Lien.	NOPA issued 05.29.2026. Deadline to file a request for hearing: 06.22.2026
2026-03-005	Contract (COPART /IAA)	Operating without active TBC	Displaying illegal expiration tags	Complaint alleges tower is affixing fraudulent tags to the TW plate to indicate compliance with vehicle registration laws.	Issue a NOPA for \$2500 for violations of ORS 822.200, operating a tow vehicle without a tow business certificate.	NOPA issued. Deadline 06.15.2026 for request for hearing or settlement.
2026-04-006	LEA	Rates and Fees	Operating without valid tow plates (per investigation)	Tower operating under expired TW plates - no active tow business certificates at the time of tow.	Issue a NOPA for \$250 for violations of ORS 822.200, operating a tow vehicle without a tow business certificate.	NOPA issued 05.29.2026. Deadline to file a request for hearing: 06.22.2026

COMPLAINTS						
Complaint No.	Type of Tow	Allegations	Allegation 2	Board Discussion	Board Action	Status
03.10.2026 Work Session						

2025-08-014	Insurance App	Allowing the use of tow business certificate by another company	Failing to cooperate in board investigation	Allowing operation of trucks by another company. Registration anomalies.	Notice of Proposed Action - \$2500 allowing use of tow plates, falsifying tow business certificate application (ORS 822.200, 822.605), \$2000 for failure to respond to Subpoena Duces Tecum and cooperate in Board investigation (OAR Chapter 750) . Total proposed \$4500.	NOPA issued. Deadline 06.22.2026 for request for hearing or settlement.
2025-08-016	Insurance App	ORS 98.856 - rates and fees	ORS 822.200 Operating without a tow business certificate	Billing inconsistencies, no written statement of fees provided. No TBC.	Notice of Proposed Action - \$2500 for operating w/o tow business certificate (ORS 822.200), \$2500 for advertising without tow business certificate (ORS 822.200), \$500 for no tow rate sheet (ORS 98.856). Total proposed \$5500.	NOPA issued. Deadline 06.22.2026 for request for hearing or settlement.
2025-12-004	Private Tow	Rates and Fees	Towing without authorization	Tower operating with expired TW plate.	Notice of Proposed Action - \$500 operating with expired tow plated (ORS 822.200)	NOPA issued. Deadline 06.22.2026 for request for hearing or settlement.
Complaint No.	Type of Tow	Location	Allegations	Allegation 2	Board Action	Status
01.13.2026 Board Mtg						
2025-08-015	PPI	Failure to refund exact change.	Refusal to provide information.		\$500 each for failure to provide exact change (delayed over 3 weeks), authorization and photos (delayed until almost a week after request)	NOPA issued, civil penalty paid in full.
2025-09-001	Illegal Tow Operation	Rates and Fees	Refusal to provide information to the vehicle owner.		\$350 Civil Penalty	Pending Dept. of Revenue Collections.

2025-11-008	Illegal Tow Operation	Operating under expired tow plates			\$250 civil penalties	NOPA issued, civil penalty paid in full.
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CORRESPONDENCE

Document	Type	Inquiry/Complaint	Action
04.27.2026 Repossession Action.pdf	Repossession	Correspondent is seeking assistance in a repo action.	
04.28.2026 Excessive charging - LEA tow.pdf	LEA Tow	Rate and Fee Complaint. Correspondent refused to provide tower name or other pertinent information.	
04.28.2026 Personal Possessions.pdf	Unknown	Release of personal possessions. Correspondent refused to provide tower name or other pertinent information.	
04.28.2026 Tow vehicle parked in violation.pdf	PPI	Tenants parking tow vehicles in apartment or other parking lots while "on call" in violation of apartment parking regulations.	
04.28.2026 Violation of Towing Laws_Regulations_Rules_.pdf	LEA Tow - arrest	DUII attorney attempting to get statements to support case.	
05.02.2026 Damage Complaint - OSP	LEA - damages	Correspondent reported damages to vehicle during tow; tower failure to provide insurance information.	
05.02.2026 PBOT - Complaint - Unauthorized Tow _ Failure to Provide Authorization	PPI	Tow unauthorized. Tower did not charge for towing services. Referred to PBOT.	
05.02.2026 PBOT Tow and Fee Dispute.pdf	PPI	Vehicle towed from assigned spot. Landlord affixed notice due to vehicle being inoperable and left for more than three days.	
05.02.2026 PBOT Towing Dispute.pdf	PPI	Vehicle parked in an area not designated for parking. Referred to PBOT.	
05.04.2026 Yearly fees.pdf	OSBOT question	Questions regarding \$100 tow board fee	

05.05.2025 - Towing Fraud	Notice of Lien	Correspondent received notice of lien for vehicle no longer owned. DMV records show correspondent has titled owner. Referred to DMV for assistance.	
05.06.2026_ Request for Complaint Information	Verifying legality of tow company	Verifying if a tow company was "legal" and if complaints had been filed.	
05.06.2026_ Unlawful Tow and Notice of Tow	Unknown	Vehicle towed without notice. Correspondent refused to provide information necessary to review the towing event.	
05.08.2026 OSP Tow Business Certificate	Tow Business Certificate	Name on tow business certificate does not match business operating the tow vehicle.	
05.08.2026 Rates OAR 257-050 Ideas	OSP Rates	Suggestions for Division 50 amendments forwarded to OSP.	
05.08.2026 Response to March 10, 2026 investigation and complaint review	ODOT tow	Additional request for Board to address issue after case closed. New information would be required.	
05.08.2026 Towing storage _ Impound lot	Tow yard requirements	Questions regarding requirements for tow yards and impound lots. Resources provided.	
05.09.2026 OSP Tow Business Certificate	Tow Business Certificate	Name on tow business certificate does not match business operating the tow vehicle.	
05.11.2026 DMV Proof of Sale Ford Fiesta	Collections	Correspondent received a collection notice. DMV records were not corrected until after title owner received collection notice..	
05.12.2026 OSP Rotation - Request for Clarification	Tow Business Certificate	Tow business certificate not found in DMV records due to special characters. Verified TBC.	
05.13.2026 - HOA_ Official complaint of Unjustified Tow	PPI	Questions re: HOA authority to have vehicles towed.	

05.13.2026 ORS 98.830 Thoughts	Abandoned Vehicles	General questions re: notice requirement under ORS 98.830; verification that ORS 98.854 (1) removes requirement for 72-hour affixed notice, and a tower is not required to be identified on signage (unless required by local jurisdiction)	
05.13.2026 Rates and Fees Complaint	PPI	Rate and fee complaint for area outside Portland. Referred to requirements of ORS 98.859 (3). Not enough information was provided to verify tow.	
05.15.2026 Ask ODOT Highway Maintenance	Legal requirements	vehicle to be loaded in an improper manner	
05.17.2026 Car towed 7h after being legally parked and note left	LEA tow	Assistance in locating towed vehicle impounded by code enforcement/law enforcement.	
05.18.2026 non-owner requesting information	LEA tow	Non-vehicle owner requiring release of non-emergency personal possessions.	
05.18.2026 OSP request for detailed invoices	OSP program	OSP requires submission of invoices under Division 50 rules.	
05.22.2026 _ Lien fee	Billing Question	Does the lien fee need to be part of the initial tow bill or does it get added on once processed? Answer: Once processed. Towers should not be charged for services not rendered.	
05.22.2026 Citation #HA37640400	Code Enforcement	Request for tow review. Referred to PBOT.	
05.22.2026 PPI from church parking lot	PPI	Unregistered owner asking assistance for release of vehicle.	
05.22.2026 Question..... Preventive maintenance	General vehicle ownership question	Vehicle owner asking what documentation is required for their SO to release a vehicle from a tow yard if the SO is not on the title.	

05.25.2026_ Cost for motorcycle	Cost for impound of a vehicle	Question: reasonable cost for a tow for a motorcycle picking up the same day	
05.27.2026 Stolen vehicle	Assistance in recovering stolen vehicle	Assistance in recovering a vehicle "stolen" by an ex and taken out of state.	