

Public Comments

Document	Type	Inquiry/Complaint	Action
Release of Vehicles Requirement	Tow Business Requirements	Public Comment related to February board meeting on vehicle release of vehicles. Public concerns on policy of releasing vehicle without requiring current registration or insurance.	
General questions regarding notifications of violations	Notice of disciplinary actions	Public Comment related to February board meeting related to investigations. Concerns of notification of violations for towers not on law enforcement rotations, including property owners, and apartment complex managers, motor clubs, code enforcement, etc.	
Procedural Questions	Investigation and complaint procedure questions	Questions regarding the investigation and complaint review process of the Board.	

FOR DISCUSSION ONLY
 Public Comments may not accurately reflect laws, rules and requirements and are not to be construed as fact or opinions or decisions of the Board.

From: [REDACTED]

Sent: Thursday, March 12, 2026 8:51 PM

To: Info TowBoard <info@towboard.oregon.gov>

Subject: Public Comment on 2/10/26: Agenda Item10b: Work Session Packet-Release of Vehicles Requirement

You don't often get email from psnell08@students.claremontmckenna.edu. [Learn why this is important](#)

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

To Whom It May Concern,

I am writing to comment on the Board's proposed policy regarding the release of towed vehicles.

My concern is that the proposed policy may unintentionally formalize an existing enforcement gap related to expired vehicle registrations.

I have a personal example. I am a Portland resident dealing with a situation in which a vehicle in my neighborhood has been towed multiple times due to expired registration. The registration has been expired for more than three years. Each time the vehicle is towed, it is released back to the owner without the underlying registration violation being addressed.

Repeated towing without correction of the underlying violation appears to convert what should function as a compliance mechanism into a routine cost of vehicle retrieval.

In order to understand the process, I contacted the towing company, the Portland Police Bureau, the Portland Bureau of Transportation, and the Oregon State Police. Each indicated that there is currently no mechanism allowing a hold to be placed on a towed vehicle solely due to expired registration.

As a result, the current system allows individuals to repeatedly retrieve vehicles while remaining in ongoing violation of state registration laws. This creates a situation in which compliance is effectively optional for some vehicle owners.

If the Board determines that private tow companies should not be responsible for verifying proof of registration, insurance, or licensing before releasing a vehicle, then it would be helpful to clarify which agency is responsible for addressing these violations once a vehicle

ard.

has been towed.

Without such clarification, the proposed policy may unintentionally reinforce a loophole that allows repeated noncompliance to continue indefinitely.

I respectfully encourage the Board to consider how enforcement responsibility should be assigned so that the underlying registration requirements remain meaningful.

Thank you for considering this comment.

Sincerely,

██████████

ard.

From: [REDACTED]
To: [MCCULLOUGH Torey \(Tow Board\)](#)
Cc: [REDACTED]
Subject: [REDACTED]
Date: Wednesday, February 11, 2026 4:23:46 PM

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hi Tory,
Thanks for sending me the invite to watch. I do have a better understanding of how new the Board is as you are still developing process and policy. Personally, I think the industry needs more regulation and accountability and more recourse for consumers.

I like the template you reviewed. Good to have if needed in legal a case.

I don't know if you want my input but regarding the question yesterday:
Should Board notify Police Depts when/if a tow company they have a contract with is found in violation and Board has issued consequences.
Both police persons said they would want to know right away.

So what about all the tow companies that are not under contract with police? Towers used by AAA, car dealers and /or have private contracts like [REDACTED] And who gets notified if it's found to be a completely illegal towing business?

Could a policy be established so notification is sent to the city/town agency that issues the tower the permit to work in that city? And that local agency informs it's departments if they have contracts?

Plus that allows city/local to revoke their permit or take other appropriate action based on State findings.

[REDACTED] for example, would the Board send findings / ruling to [REDACTED] Business License Dept. and local Code Compliance because if they have violated State regulations they are violating the local agreement and in this case they also violate additional local rules/regulations.

[REDACTED] has a contract with the apartment complex, will they be notified if/when tower is found guilty? Otherwise, how would they or any other places they have contracts with know?

And could/should local code compliance/license depts notify State Board when they investigate a complaint that finds State violations?

You mentioned 'on the scene investigators' yesterday. Is someone going through everything

ard.

the tow company is supposed to have /do as a business as well as what they did and didn't do
for our case specifically?

Will someone check that fees are /not posted at tow yard, that there's not an attendant on duty at all times, that hrs. to collect are M - F 9am - 5pm. not 8am - 6pm per state rules and that the after hrs gate fee is \$100, and verify when or they called police to report the tows within hr, and if they documented a visual inventory of cars contents, one car was full of items.

And so far no response from Tow company, it's now day 5.

Thanks!



ard.

From: [Tow Board Compliance](#)
To: [REDACTED]
Subject: RE: Agenda Items and Procedural Questions for March 10, 2026 Board Meeting
Date: Monday, February 9, 2026 7:29:48 PM

Good afternoon,

Thank you for contacting the Oregon State Board of Towing.

As noted on the Notice of Public Meeting:

REQUEST FOR AGENDA ITEMS: Requests for items to be placed on the Agenda must be submitted by **5:00 p.m. February 2, 2026 to be considered.**

Your request for additions to the Agenda were received on Monday, February 9, after the deadline to submit requests for the Agenda. Your request will be considered for the next Board regular board meeting.

The Board will be discussing the investigation road map as part of the Meeting agenda, this may answer most of your questions.

From: [REDACTED]
Sent: Saturday, February 7, 2026 4:51 AM
To: Tow Board Compliance
Subject: Agenda Items and Procedural Questions for March 10, 2026 Board Meeting

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Administrator McCullough,

I am writing in advance of the March 10, 2026 Oregon State Board of Towing meeting to formally request that the following procedural items be included for discussion, and to confirm that the associated questions are appropriate for public comment during the meeting.

Requested Agenda Items (Procedural Only):

1. Clarification of the Board's investigative standards and procedures under the Oregon Revised Statutes administered by the Board.
2. Standard timelines for complaint intake, investigation extensions, completion, and Board review.
3. Required documentation and evidentiary thresholds relied upon by investigators when determining statutory compliance by a tower.
4. Board procedures for handling investigations that are dismissed, reopened, or separated into subsequent investigations.
5. Notification requirements to complainants regarding investigation status changes, extensions, dismissals, and Board review dates.
6. Scope and limits of Board authority versus matters preserved for civil courts, including how findings are formally documented.
7. How the Board records and preserves investigative findings for public record and future reference.

Procedural Questions for the March 10 Meeting:

1. What Oregon Revised Statutes and administrative rules govern the Board's investigation process from intake through Board review?

ard.

2. What standards of proof are applied when determining whether a tow company violated statutes within the Board's jurisdiction?
3. What documentation is a tow company required to produce during an investigation, and how is the absence of required documentation evaluated?
4. What are the formal timelines for notifying a complainant of:
 - investigation extensions,
 - closure or dismissal of an investigation,
 - initiation of a subsequent or separate investigation,
 - placement of an investigation on a Board meeting agenda?
5. When an investigation is dismissed and a separate investigation is later opened, how does the Board ensure continuity of factual findings and statutory review?
6. How does the Board distinguish between investigatory findings and enforcement or disciplinary authority in its final determinations?
7. What records from the investigation become part of the Board's official record reviewed at a public meeting?
8. How does the Board document statutory violations when disciplinary action is not pursued?
9. What procedural safeguards exist to ensure investigations are conducted consistently and without material omission?
10. How may members of the public properly preserve procedural objections or concerns for the administrative record?

These requests are made in good faith to understand the Board's statutory processes and to ensure clarity regarding procedural standards applied in investigations reviewed by the Board.

Thank you for your time and consideration.

Respectfully,

[REDACTED]

[REDACTED]

ard.