

Case Updates – 01/13/2026 Board Actions

				Letter of correction, letter of education. Note: *Tower admits they do not have a rate sheet. * Subpoena response due: 02/10/2026 * Address correction due 02/21/2026
2025-12-003	PPI	Milwaukie		
2025-08-015	PPI	Beaverton		Notice and letter for review. *02/17/2026 - Response due by date.
2025-08-015	Operating an Illegal Tow Business	Clackamas		Nelson Tires corrected tow business certificates
2025-09-001	PPI	Prineville		Notice of Proposed Action for review *02/17/2026 - Response due by date. Crook County 25CR55051 - Hearing Date: 02/11/2026
2025-11-009	PPI	Boardman		Notice of Proposed Action for review *02/17/2026 - Response due by date.
2025-07-021	PPI	Grants Pass	Letter of education	

Correspondence	Location	Complaint Allegations	CONFIDENTIAL Staff Findings
01.17.2026	Washington Co.	Retailer rate to impose parking restrictions.	
01.23.2026	Washington Co.	Scrapper dumping rvs	
01.23.2026	Washington Co.	Tower request for Board intervention	
01.26.2026	Washington Co.	Stolen Vehicle - fees and rates established	Tower rates and fees match the billing statement
01.27.2026	I-5	Possible ODOT or OSP Tow - Failure to Release a vehicle	Complainant cannot provide the information necessary to identify the tow; tower contacted, no response.
			*Owner allegedly sold vehicle, did not contact DMV within 10 days. *Vehicle left in the tow yard for 60 days. *Rates match the OSP rate sheet on file.
01.28.2026	Oregon Coast	Rate Complaint - Seller did not contact DMV	
02.03.2026	Eugene	Collection Complaint	*Owner allegedly sold vehicle, did not contact DMV until after the impound (2 years after the alleged sale of the vehicle) *FOR REVIEW - Notice of Lien issued more than three business days after the tow, no right to hearing language.



# Oregon State Board of Towing

## Complaint and Investigation Road Map

### February 10, 2026

*This document does not represent formal Board decisions or policy; the document facilitates board discussion to:*

1. Define or clarify ambiguity in Oregon law.
2. Address situations and scenarios submitted in complaints
3. Answer questions or provide clarification to the public, towing industry, and board partners.

## Objectives:

Define a complaint and investigation road map for public education and to set expectations of the public and towing industry of complaints, investigations, and compliance enforcement.

The Oregon State Board of Towing was established to protect the safety and well-being of the public through the regulation of the towing industry.

The purpose of the Board is compliance enforcement. The Board has the authority to investigate and take appropriate action, as determined by the Board, against individuals and companies for violations of the laws and rules assigned to the Board to administer.

The Board is not a hearing board, does not represent either the tower or the complainant, and does not mediate disputes or disagreements between a vehicle owner and a tower.

The Board accepts complaints and investigates towing events to determine if a tower violated the statutes assigned to the Board to administer, identify effectiveness of current statutes, and works with partners to address compliance enforcement, gray areas, or inconsistencies within current statutes.

If violations by the tower are found, the Board may take such action as the Board determines is reasonable.

The Board does not have statutory authority to award or demand restitution, payment of damages, release of a vehicle, or other compensation demanded or requested by the vehicle owner.

The Board cannot provide legal advice or guidance, and does not discuss legal matters, including statutes or rules outside of the Board's assigned statutes.

Complainants seeking personal compensation or damages might consider contacting a legal professional to discuss legal options.

## Complaints and Inquiries:

*For the purposes of initial review, complaints and compliance inquiries follow the same process.*

- Complaints may be submitted by email. Complaints are not taken over the phone.
- Complex complaints, or submission of documentation, may require that the Complainant provide the information through a secure portal. It is the responsibility of a complainant to provide information when requested.
- The Board must conduct an investigation before making a determination; the Board does not have statutory authority to require, compel, or demand the immediate release of a vehicle or a reduction in tow rates or fees.
- The Board cannot require or compel law enforcement or another agency to take action, even if there are violations of Oregon's statutes assigned to that agency to administer.
- The Board cannot require a tower to take an action not required or allowed by statute.
- The Board is responsible for compliance enforcement of the tower; the Board does not have compliance enforcement authority over law enforcement, state agencies, local jurisdictions, property owners, or vehicle owners, or statutes not assigned to the Board to administer.
- The Board and Board staff do not provide legal guidance or advice. Questions related to statutes not assigned to the Board to administer should be directed to a legal professional or the appropriate agency.
- Law enforcement impounds are conducted under ORS Chapter 819. The Board does not have visibility or authority over non-preference tow programs, and does not dispute the validity of a tow conducted under ORS Chapter 819.
- It is a violation of Oregon's statutes to abandon a vehicle or to park a vehicle without permission of the property owner. The Board does not dispute a property owner's legal right to remove an unauthorized vehicle from their property.
- Vehicle ownership is determined by DMV official, computer records.

## Complaint Review:

Complaints are reviewed to determine Board authority, possible violations, and necessary information.

### Step 1:

Board staff determines:

Is this a complaint against a tower?

- If yes, does the tower have an active tow business license?
- If no tow business license, an investigation is open.

*Question for the Board: how soon should law enforcement be contacted?*

### Step 2:

Board staff identifies the following information:

- Date of the tow. *Did the tow occur within the last two years?*
- Location of the tow. *Oregon? Subject to local jurisdiction?*
- Who authorized the tow? *PPI? Law Enforcement or agency? Vehicle Owner?*

- Reason for the tow. Circumstances of the tow – is this a Tow Board issue?  
*Is the towing event a Tow Board issue?*
- Vehicle identification: *Make, model and VIN – confirm registration*
- Statement of fees provided?
- Agency of jurisdiction: *law enforcement, state agency, other state*

#### Step 3:

Board staff contacts the complainant and confirms:

- Role and purpose of the Board, limitation of authority (*see above*)
- Information required to process complaint (*missing information from Step 2 if needed*)
- An initial analysis of the complaint allegations and the Board's authority.  
*If possible violations, an explanation of the statutes assigned to the Board.*  
*If not a Tow Board matter, refer to appropriate authority and resources if known.*  
*Board staff does not discuss statutes and rules not assigned to the Board to administer.*  
*The Board does not have law enforcement authority and does not determine if a behavior is criminal and subject to arrest.*

*Expectations: The Board is not a hearing board and does not mediate dispute or award damages. The complainant might consider contacting a legal professional if the complainant seeks release of the vehicle, damages, restitution, and other compensation to the*

#### Step 4:

Board contacts the tower to request:

- If not found: tow business certificate and insurance information
- Authorization for the tow
- Pre-tow photographs (if required)
- Confirmation of when law enforcement was contacted (if required)
- Written Statement of Fees/Rate Sheet
- Itemized invoice
- Notice of Lien (if required)

#### Investigation:

- A formal investigation may be opened when there is probable cause of a violation, when the towing event demonstrates a gray area in statutes or compliance enforcement, or when the circumstances and facts of the tow relate to Board research or discussions.
- Opening of a board investigation is not to be construed as wrong-doing or violations of the tower.
- Allegations of a complaint are not always violations of the law.
- The Board investigates a towing event to determine a tower's compliance with Oregon's statutes and documents the facts of the towing event.
- Allegations for violations of statutes not assigned to the Board to administer might be considered as a mitigating circumstance, but the Board cannot take action for a violation of a statute not assigned to the Board to administer.

- A tower's failure to cooperate in a board investigation is grounds for additional disciplinary action.
- Investigations remain "open" until Board determination.
- Investigations are confidential to protect the process and the parties.
- Providing information after the requested date or submitting additional materials or correspondence less than two weeks prior to the Board meeting will delay review of the case until the next compliance review meeting.
- Complainants and Towers will be notified when the case is scheduled to be reviewed on the Agenda no later than the day before the board meeting.

#### Board Review:

- Only the Board members can determine violations for the purposes of disciplinary action. Determination is made during a public board meeting.
- Board members review the complaint, investigation report, case materials, and relevant information. Documentation and information provided, but not relevant to determining a violation, are made available to the Board members.
- The investigation remains "open" until Board review of the materials. After review, the Board may vote for Board action, or continue the investigation to confirm facts or obtain information necessary for the Board to make a determination.
- The Oregon State Board of Towing uses a progressive disciplinary model and consider mitigating circumstances prior to voting for Board action.
- Board meetings are open to the public. Board meetings are not recorded. Complainants and towers are encouraged to attend the meeting virtually to hear discussion of their case.
- The Board does not take testimony or public comments during review of the case.

#### After the Board Meeting:

- Board staff will complete the Board actions as quickly as possible.
- The parties to the complaint will be contacted by email with the Board's determination.
- Complainants and towers are requested to wait two full weeks prior to contacting staff for a status update.
- There is no forum or appeal process for a complainant to dispute the findings of the Board, unless the Board does not take disciplinary action and the Complainant can provide information not previously provided to the Board substantiating violations by the tower within 10 days of the Board's decision.
- When a tower is issued a Letter of Education, compliance with the statutes is expected.
- When a tower is issued a Letter of Correction, proof of compliance is required by the date specified in the letter. If compliance is not verified, the Board may consider disciplinary action.
- When formal disciplinary action is proposed, Board staff issues a Notice of Proposed Action which includes: the Board's Findings of Fact, the Board's Conclusion of Law demonstrating how the tower's actions violated the statutes, and the proposed disciplinary action and the right to a hearing to contest the findings of fact of conclusions of law.

### Expectations - Complainant:

- The Board investigates compliance inquiries and complaints for a tower's violation of statutes assigned to the Board to administer.
- Complainants are responsible for providing the information necessary for the Board to investigate the allegations of the complaint.
- The Board does not represent a complainant.
- Damages, restitution, reimbursement, and demands for release of vehicles or possessions not of an emergency nature is a civil matter.
- Complainants will be contacted when:
  - The complaint is received (within 30 days)
  - A determination is made.
  - No later than the day before if the complaint is being reviewed at a public board meeting
- The Board complaint process is not meant to compensate for towing situations caused by complainant's behavior or decisions.
- Board staff cannot give legal advice or guidance, and cannot discuss statutes not assigned to the Board to administer for purposes of compliance enforcement.
- Harassing, bullying, demeaning, and threatening behavior will not be tolerated.

### Expectations - Tower:

- The Board is required to investigate complaints; complaint allegations will be fairly investigated.
- The Board does not represent a tower in disciplinary actions.
- Most complaints are resolved by the tower providing requested information.
- Failure to respond to a request for information, or not providing accurate information, will escalate the investigation and is grounds for disciplinary action; the Board is not required to delay its determination if a tower fails or refuses to cooperate with an investigation.
- Towers have several opportunities to provide information during investigations.
- The Board is funded by the towing industry. Due to limited resources, not all investigations will include field visits and personal interviews.
- The board focuses on education and outreach; the Board's progressive disciplinary action method is designed for compliance and enforcement and is not punitive in nature.
- Compliance with all statutes, rules and regulations related to your towing business is your responsibility and is required.

### Public access to Complaint and Investigation Information:

- The Board regularly provides general information of complaints at board meetings.
- Once the Board has at least 10 finalized disciplinary actions, the Board will post a disciplinary report identifying the case number, name of the tow company, a linked copy of the disciplinary action, and the effective date.

State Board of Towing - Disciplinary Action Report (Example Information)			
Case No.	Respondent	Description	Eff. Date

2024-07-001	Tow Company	Final Default Order	08/08/2024
2024-07-002	Tow Company	Stipulated Agreement and Final Order	08/08/2024

- To ensure the integrity of Board investigations and disciplinary actions, complaints and investigation materials will not be released under a public records request until the matter has been resolved and closed by the Board.
- General complaint information, including the nature of the complaints, details of a towing event, and resolution or decision by the Board, will be made available to the public through the Board's website and at public meetings and work session.
- The Board does not receive general or tax payer funds. Oregon public records request fees are assessed based on the reasonable costs of locating, reviewing, and reproducing records in half hour increments. Photocopy charges will apply.
- Reports, data, information or documents generated or provided to the Board by another agency or entity remain the property of the entity or agency. A public records request to the originating agency is required.
- To ensure legal requirements and expectations of privacy and confidentiality, public records requests for complaint or investigation documents will be referred to the Dept. of Justice for processing. Applicable DOJ rates and fees will apply. A deposit may be required prior to DOJ review of the public records request.