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STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of:

Case No. CA-25-0057

M.A.D. Towing and Recovery, LLC

Respondent.

**FINAL ORDER TO CEASE AND
DESIST AND FINAL ORDER
ASSESSING CIVIL PENALTIES,
ENTERED BY CONSENT**

The Division of Financial Regulation (“Division”) acting on behalf of the Director of the Department of Consumer and Business Services for the State of Oregon (the “Director”) investigated the business activities of M.A.D Towing and Recovery, LLC (“M.A.D. Towing”) and determined that M.A.D. Towing violated certain provisions of Oregon Revised Statutes (“ORS”) 697.005 to 697.095 and Oregon Administrative Rules (“OAR”) 441-810-0000 through 441-810-0260 (collectively the “Oregon Collection Agency Law”).

M.A.D. Towing wishes to resolve and settle this matter with the Director.

Now, therefore, as evidenced by the authorized signatures subscribed on this Order, M.A.D. Towing hereby CONSENTS to entry of this Order upon the Director’s Findings of Fact and Conclusions of Law as stated hereinafter.

FINDINGS OF FACT

The Director FINDS that:

1. M.A.D Towing and Recovery, LLC is an Oregon limited liability company with a principal place of business located at 15 W Vilas Rd, Central Point, OR 97502.

2. M.A.D. Towing performs towing services and repossessions and has been engaged in that activity in Oregon since 2022.

3. Although M.A.D. Towing has been conducting repossessions in Oregon since 2022, at all times material it was not registered with the Division as a collection agency.

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1 4. On September 3, 2024, the Division received a complaint concerning M.A.D.
2 Towing’s repossession activity in Oregon and, on September 4, 2024, the Division sent a
3 letter which instructed M.A.D. Towing to “immediately stop all solicitation, collection
4 activity, and/or repossession activity with Oregon consumers until M.A.D. Towing has
5 submitted a registration application and been issued a certificate by the Division.” The
6 letter also requested that M.A.D. Towing provide a written response that included a list of
7 any money received as a result of M.A.D. Towing’s collection agency activities in
8 Oregon and a list of all Oregon consumers from whom M.A.D. Towing had engaged in
9 collection activity. The letter was sent via certified mail to M.A.D. Towing’s mailing
10 address and by email to the email address listed on its website,
11 service@MADtowingandrecovery.com.

12 5. On September 16, 2024, M.A.D. Towing provided the Division with a
13 customer list¹ showing the creditors on whose behalf M.A.D. Towing had been
14 repossessing vehicles, together with the “amounts collected” by M.A.D. Towing from
15 those creditors for conducting repossessions on their behalf in Oregon. As reflected on
16 the customer list, M.A.D Towing had collected \$168,001.90 in fees from creditors for
17 conducting repossessions on their behalf from 2022 until September 16, 2024.

18 6. On the same day, September 16, 2024, the Division again requested that
19 M.A.D. Towing provide information to the Division concerning consumers whose
20 vehicles that M.A.D. Towing had repossessed, including the make and model of the
21 vehicle, date of repossession, and the location each repossession took place. M.A.D.
22 Towing responded and stated that they had “repossessed over 100 vehicles” in Oregon
23 across the list of creditors previously provided to the Division but did not provide the

24 _____
25 ¹ M.A.D. Towing did not include a list of Oregon consumers whose vehicles it had
repossessed



1 other information sought by the Division.

2 7. Following the September 16, 2024, emails, M.A.D. Towing began its attempts
3 at obtaining a registration with the Division. On October 23, 2024, M.A.D. Towing
4 provided an update to the Division concerning its registration status and, in response, the
5 Division reiterated to M.A.D. Towing that it should not complete any repossessions in
6 Oregon until it becomes properly licensed/registered.

7 8. On November 12, 2024, M.A.D. Towing sent an email to the Division stating
8 that they were experiencing issues with the application and that they “found it necessary
9 to perform a minimal number of repos to maintain [their] accounts.” M.A.D. Towing
10 represented to the Division that they had initially “paused all repos for three weeks” and
11 that they “have paused repos once again.”

12 9. On January 30, 2025, M.A.D. Towing submitted an application for an Oregon
13 collection agency registration, however, M.A.D Towing did not submit the required
14 documentation within the timeframes required and the application was withdrawn and
15 considered abandoned by the Division on March 24, 2025.

16 10. On March 27, 2025, the Division sent an email to M.A.D. Towing concerning
17 the abandoned collection agency application and requested that M.A.D. Towing produce
18 information that that had previously been requested in the September 16, 2024, email but
19 which M.A.D. Towing had not yet provided, including “a list of all repossession activity
20 in Oregon from the start of your company through today, including dates of repossession,
21 vehicle make/model, and the location the repossession took place.” At that time, the
22 Division reiterated to M.A.D. Towing that “no repossessions in Oregon should take place
23 until the company is properly licensed.”

24 11. On April 9, 2025, the Division received an email from M.A.D. Towing
25 together with a document titled “M.A.D. Repo Record PDF,” which identified the



1 repossessions it had conducted in Oregon, the make and model of the vehicles
2 repossessed, and the location of each repossession.

3 12. As reflected in the “M.A.D. Repo Record PDF” document:

4 A. From March 30, 2022, until the Division sent its September 4, 2024, email
5 instructing M.A.D. Towing to “immediately stop all solicitation, collection activity,
6 and/or repossession activity with Oregon consumers,” M.A.D. Towing had conducted
7 repossessions of 278 vehicles in Oregon on behalf of creditors.

8 B. From September 4, 2024, through March 27, 2025, M.A.D. Towing
9 conducted repossessions of 180 vehicles in Oregon on behalf of creditors at a rate of
10 approximately 0.88 repossessions per day.

11 C. M.A.D. Towing did not pause its repossession of vehicles at any point from
12 September 4, 2025 through March 27, 2025, despite representing to the Division that
13 they had done so on at least two occasions.

14 13. Following the abandoned application, M.A.D. Towing submitted a new
15 application to register as an Oregon collection agency into NMLS,² provided the required
16 documents, and on June 6, 2025, the Division approved M.A.D. Towing’s collection
17 agency registration with the Division, NMLS # 2684788.

18 14. On October 9, 2025, the Division requested that M.A.D. Towing provide a list
19 of the creditors on whose behalf M.A.D. Towing was conducting repossessions and the
20 amounts it had received in fees from each creditor identified from the date of their initial
21 September 16, 2024, response until M.A.D Towing obtained its Oregon collection agency
22 registration on June 6, 2025.

23 15. On October 27, 2025, M.A.D. Towing provided the Division with a
24 spreadsheet which purports to identify the VIN for each vehicle repossessed from
25

26 ² Nationwide Multi-State Licensing System

1 September 4, 2024 - June 6, 2025, the dates each vehicle was repossessed, and the
2 amounts in fees charged to the creditors for each repossession. In total, M.A.D. Towing
3 received \$158,051.98 in fees from creditors for conducting 220 repossessions *after*
4 M.A.D. Towing had been instructed by the Division to “immediately stop all solicitation,
5 collection activity, and/or repossession activity with Oregon consumers.”

6 **CONCLUSIONS OF LAW**

7 The Director CONCLUDES that:

8 16. ORS 697.015 forbids a person³ from doing business as a collections agency in
9 Oregon unless that person “registers with the Department of Consumer and Business
10 Services under ORS 697.031 and maintains the registration in accordance with that
11 section.”

12 17. Under ORS 697.005(1)(a)(D), “collection agency” means, among other things,
13 a “person that engages in the business of soliciting the right to repossess or in
14 repossessing collateral security due or asserted to be due to another person.”

15 18. By engaging in the business of soliciting the right to possess and repossessing
16 collateral due or asserted to be due to another person as described in paragraphs 1-3, 5-6,
17 11-12, and 15 above, M.A.D. Towing was operating as a collection agency in Oregon.

18 19. By operating as a collections agency in Oregon without maintaining a
19 registration as described in paragraphs 1-3, 5-6, 11-12, and 15, M.A.D. Towing
20 committed 498 violations of ORS 697.015.

21 20. Under ORS 697.095, “a person who violates any provision of ORS 697.015 or
22 697.058... is subject to forfeiture and payment of a civil penalty to the Department of
23 Consumer and Business Services in an amount of not more than \$1,000 for each offense.”

24 _____
25 ³ The definition of person under ORS 697.005(8) includes “an individual, firm, partnership,
26 trust, joint venture, association, limited liability company or corporation.”



1 OAR 441-810-0140 additionally provides that “civil penalties shall be \$400 for the first
2 offense” and “\$1,000 for each subsequent offense.”

3 21. Under ORS 697.091, a person who violates any provision of ORS
4 697.015...shall not charge or receive any fee or compensation on any moneys received or
5 collected while in violation of any provision of ORS 697.015 or 697.058 or any rule
6 adopted under ORS 697.031 or 697.085.

7 22. Because the Director has reason to believe that M.A.D. Towing violated ORS
8 697.015, the Director is authorized under ORS 697.093(1)(d)(A) to order the company to
9 cease and desist from violating this statute.

10 **ORDERS**

11 Now therefore, the Director issues the following ORDERS:

12 23. As authorized by ORS 697.093(1)(d)(A), the Director ORDERS M.A.D.
13 Towing to CEASE AND DESIST from violating ORS 697.015.

14 24. As authorized by ORS 697.095 and OAR 441-810-0140, the Director
15 ORDERS M.A.D. Towing to pay \$85,000.00 in CIVIL PENALTIES for its 498
16 violations of ORS 697.015.

17 25. The Director hereby SUSPENDS payment of \$65,000.00 of the \$85,000.00
18 CIVIL PENALTY for a period of three years from the effective date of this Order,
19 provided M.A.D. Towing complies with the following terms:

20 A. M.A.D Towing complies with the terms of this Order; and

21 B. For the three years following the effective date of this Order, M.A.D Towing
22 shall commit no new violations of the Oregon Collection Agency Law.

23 26. Along with this Order, M.A.D. Towing shall submit \$2,500.00 to the Director
24 as the initial payment for the non-suspended portion of the civil penalties.

25 ///



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1 27. Payment toward the remaining \$17,500.00 of the non-suspended civil penalties
2 shall be made to the Director in the following installments:

- 3 A. \$2,500.00 within 30 days of the date of entry of this Order;
- 4 B. \$2,500.00 within 60 days of the date of entry of this Order;
- 5 C. \$2,500.00 within 90 days of the date of entry of this Order;
- 6 D. \$2,500.00 within 120 days of the date of entry of this Order;
- 7 E. \$2,500.00 within 150 days of the date of entry of this Order;
- 8 F. \$2,500.00 within 180 days of the date of entry of this Order;
- 9 G. \$2,500.00 within 210 days of the date of entry of this Order;

10 28. The suspended CIVIL PENALTY of \$65,000.00 will be waived three years from
11 the effective date of this Order, provided M.A.D. Towing has complied with the foregoing
12 Order terms. M.A.D. Towing's failure to satisfy any term of this Order will render the
13 suspended penalties immediately due and owing.

14 29. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that
15 provision, entry of this Order does not limit or prevent further remedies available to the
16 Director under Oregon law to enforce this Order or take action for violations of this Order
17 or of the Oregon Collection Agency Laws not covered by this Order.

18
19 SO ORDERED this 15th day of January, 2026

20 **SEAN O'DAY**, Director
21 Department of Consumer and Business Services

22
23 /s/ Dorothy Bean

24 Dorothy Bean, Chief of Enforcement
25 Division of Financial Regulation

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ENTITY CONSENT TO ENTRY OF ORDER

I, Rory Dodge, am an officer or manager of M.A.D. Towing and Recovery, LLC (“M.A.D. Towing”) and I am authorized to act and sign on their behalf. I have read the foregoing Order, and I know and fully understand the contents hereof. The factual allegations stated herein are true and correct. M.A.D. Towing has been advised of the right to a hearing and of the right to be represented by counsel in this matter and voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. M.A.D. Towing understands that the Director reserves the right to take further action against it to enforce this Order or to take appropriate action upon discovery that M.A.D. Towing has committed other violations of the Collection Agency Law. M.A.D. Towing, along with its officers, directors, employees, or agents, will fully comply with the terms and conditions stated herein.

M.A.D. Towing understands that this Order is a public document.

Signature: /s/ Rory Dodge

Position Held: Owner/ Operator

State of Oregon

County of Jackson

Signed or attested before me on this 30th day of December, 2025.

/s/ Ralph Waldo Emerson III
Notary Public

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