

OFFICE OF OPERATIONS

OPERATIONS NOTICE NO. 3

November 18, 2011

**SUBJECT: CLARIFICATION OF REPOSSESSION AGENCY LICENSE  
REQUIREMENTS REGARDING LEGAL OWNER RELEASES OF  
30-DAY HOLD VEHICLES**

**EFFECTIVE: IMMEDIATELY**

This Notice clarifies the definitions of a legal owner (L/O) and a repossession agency/agent for the purpose of obtaining a release of a vehicle on a 30-day hold. Operations Notice No. 11, *Change in Law Regarding Legal Owner Releases on 30-Day Hold Vehicles*, dated December 9, 2009, has been interpreted by some Area personnel as requiring a repossession agency license prior to releasing a vehicle hold. Legal owners or their agents are exempt by law from the requirement to provide a repossession agency license.

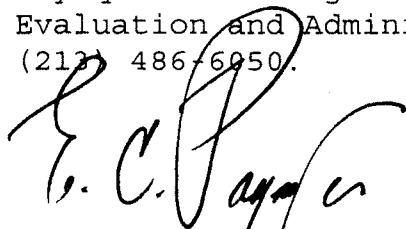
**Legal Owner/Legal Owner Agent Defined:** California Vehicle Code Section 14.602.6 (f) (1) defines a L/O as a motor vehicle dealer, bank, credit union, acceptance corporation or other licensed financial institution legally operating in the State, or is another person, not the registered owner, holding a security interest in the vehicle.

**Repossession agencies/agents are required to have a vehicle repossession agency license when repossessing a vehicle and obtaining a release on a 30-day hold vehicle.** Since the L/O and the L/O's agent are excluded from being a repossession agency per California Business and Professions Code Section 7500.3, the L/O or the L/O's agent are not required to have a repossession agency license to obtain a release for a vehicle on a 30-day hold.

Section 14602.6 (f) (3) of the California Vehicle Code requires that an L/O of the vehicle or the L/O's agent presents the following documents in order to obtain a release of a vehicle on a 30-day hold:

- \* A copy of the assignment as defined in subdivision (b) of Section 7500.1 of the California Business and Professions Code, and any one of the following:
- \* A certificate of repossession for the vehicle, or a security agreement for the vehicle, or the title showing proof of legal ownership for the vehicle.

Any questions regarding this Notice should be directed to the Evaluation and Administration Section, Office of Operations, at (212) 486-6950.

A large, stylized handwritten signature in black ink, appearing to read 'E. C. Paysinger', is written over the typed name below.

EARL C. PAYSINGER, Assistant Chief  
Director, Office of Operations

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