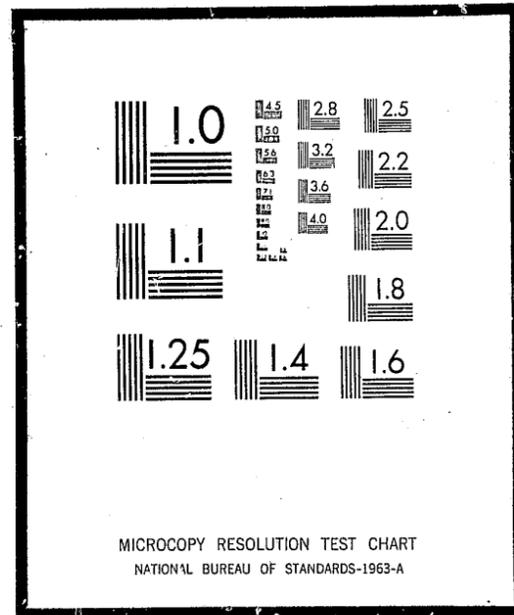


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## Current Regulation of Private Police: Regulatory Agency Experience and Views Volume III; R-871/DOJ

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By  
JAMES S. KAKALIK  
and SORREL WILDHORN  
The Rand Corporation  
Santa Monica, California

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## *FOREWORD*

The principal investigators in this study were Sorrel Wildhorn (study director) and James S. Kakalik. Members of the Los Angeles law firm of Munger, Tolles, Hills, and Rickershauser conducted the analysis of the legal issues and contributed significantly to the suggested policy and statutory guidelines.

Inquiries concerning this report should be directed to Sorrel Wildhorn at The Rand Corporation.

## PREFACE

This report is one of a series of five describing a 16-month study performed by The Rand Corporation under Grant NI-70-057 from the National Institute of Law Enforcement and Criminal Justice (NILECJ), Law Enforcement Assistance Administration of the United States Department of Justice.

The broad purposes of the study are essentially twofold. First, we seek to describe the nature and extent of the private police industry\* in the United States, its problems, its present regulation, and how the law impinges on it. And second, we have attempted to evaluate the benefits, costs, and risks to society of current private security and, as specifically requested by the NILECJ, to develop preliminary policy and statutory guidelines for improving its future operations and regulation. The results of the study are intended for use by the private police industry and by the governmental agencies that regulate it, as well as by the general public.

The five reports comprising the study are:

R-869-DOJ *Private Police in the United States, Findings and Recommendations*

This comprehensive summary report draws on information contained in R-870-DOJ, R-871-DOJ, and R-872-DOJ to develop the overall findings and recommendations of the study.

R-870-DOJ *The Private Police Industry: Its Nature and Extent*

This descriptive report covers the nature, size, growth, and operation of the industry and its personnel. It also de-

\* Throughout this study we have used the term *private police* to include all privately employed guards, investigators, patrolmen, alarm and armored-car personnel, and any other personnel performing similar functions.

scribes the results of a survey of private security employees.

R-871-DOJ *Current Regulation of Private Police: Regulatory Agency Experience and Views*

Licensing and regulation of the industry in every state and several cities is described. This report also includes extensive data on regulatory agency experience, complaints, disciplinary actions taken, and the views of 42 agencies on needed changes in regulation.

R-872-DOJ *The Law and Private Police*

This report discusses the law as it relates to the private police industry. It includes a general discussion of the sources of legal limitations upon private police activities and personnel and sources of legal powers, and an examination of specific legal problems raised by these activities and by the relationships between the users and providers of private security services. The legal doctrines governing particular security activities are evaluated and recommendations for improvement are offered.

R-873-DOJ *Special-Purpose Public Police*

Descriptive information is presented on certain types of public forces not having general law-enforcement responsibilities. These include reserve police, special-purpose federal forces, special local law-enforcement agencies, and campus police. These data provide a useful context for analyzing the role of private police.

## ACKNOWLEDGMENTS

We are especially grateful to the many directors of state and local agencies that regulate private security who responded to our survey. They supplied us with valuable data and recommendations for improving regulation. Alphabetically, by state, they are: Jamie Moore, Chief of Police, Birmingham (Alabama) Police Department; Gordon H. Bishop, Chief, California Bureau of Collection and Investigative Services; Sergeant L. H. Jenkins, Commission Investigation Division, Los Angeles Police Department; Charles R. Gain, Chief of Police, Oakland (California) Police Department; Robert B. Murphy of the San Jose (California) Police Department; John F. Duffy of the San Diego County (California) Sheriff's Department; George A. Canjar, Manager of Safety and Excise for the City and County of Denver, Colorado; Commissioner Cleveland B. Fuessenich of the Connecticut State Police Department; Colonel George J. Bundeck, Chairman of the Delaware Board of Examiners for Private Detectives; L. H. Rollins, Chief, Bureau of Licensing of the Florida Department of State; Mahlon Byerly, of the Indiana State Police; Michael Sellers, Commissioner, Iowa Department of Public Safety; M. R. Kirkpatrick, Chief of Police of the Wichita (Kansas) Police Department; Colonel William O. Newman, Department of Public Safety, State of Kentucky; Colonel T. S. Smith, Superintendent, Maryland State Police; Commissioner Donald D. Pomerleau, Baltimore (Maryland) Police Department; Colonel John R. Plants, Director, Licensing Unit, Michigan State Police; Harold P. Higgins, Bureau of Criminal Apprehension, State of Minnesota; Lieutenant Colonel Bryce Thompson, Commanding Administration Bureau, Kansas City (Missouri) Board of Police Commissioners; Colonel James L. Sanders, President, Board of Police Commissioners, St. Louis, Missouri; Colonel Robert J. di Grazia, Superintendent of the St. Louis County (Missouri) Department of Police; Allen J. Beermann, Secretary of the State of Nebraska; Robert List, Attorney General, State of Nevada; Colonel David B. Kelly, Superintendent of the Department of Law and Public Safety, State of New Jersey; John L. Redden,

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Sidney Epstein, Richard Laymon, and Lou Mayo of the National Institute of Law Enforcement and Criminal Justice, Law Enforcement Assistance Administration, U.S. Department of Justice, offered their cooperation and counsel.

Rand colleagues L. Green and M. Hammer and Rand consultant R. S. Post summarized the licensing statutes and regulations of each state and several cities. Clarence H. A. Romig, Associate Professor at the University of Illinois Police Training Institute, supplied us with valuable information on polygraph legislation.

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of Consumer Affairs; Colonel John R. Plants, Director, Licensing Unit, Michigan State Police; William C. Linn, Vice President, Administration, Pinkerton's, Incorporated; Frederic E. Crist, President, Burns International Security Services, Incorporated; G. Ralph Kiel, Vice President, Public Relations, Wackenhut Corporation; Richard M. Bugbee and Ray A. Sapp, General Manager, Operations, American District Telegraph Company; and A. W. Innamorati, Assistant Commissioner for Buildings Management, U.S. General Services Administration.

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## I. A GUIDE TO THIS REPORT

In this report we discuss a variety of aspects of the licensing and regulation of the private police industry. A summary of this material is found in Chapters VIII and XI of companion report R-869-DOJ, which discusses the overall findings and recommendations of the study.

Chapter II of the present report describes and summarizes current licensing and regulation for each state. Chapter III provides a similar description and summary of regulation at the local level for a sample of 19 cities and counties. The ordinances and ad-

ministrative regulations in these localities are among the tougher and stricter that have been enacted by any localities.

Chapter IV presents and discusses the experience of regulatory agencies, with special emphasis on the problems of the private police industry and the sanctions imposed on it by the agencies. Finally, Chapter V presents regulatory agency directors' views regarding desirable changes in regulation. The information contained in Chapters IV and V was gathered by surveying the agencies by mail questionnaire.

## II. CURRENT STATE LICENSING AND REGULATION

### OVERVIEW

The licensing and regulation of private security at the state level is characterized by a lack of uniformity and comprehensiveness. Typically, the laws exclude many types of security businesses and personnel operating within the states.

There is wide variation among states in the extent of regulation. The industry is virtually unregulated in 12 states—typically, those states that are neither heavily industrialized nor densely populated. The remaining 38 states exhibit a wide range in quality and extent of regulation, from virtually automatic licensing of private investigative agencies only, to comprehensive regulatory programs covering most types of security agencies, with high licensing standards plus mandatory state screening and registration of employees. Regulation of the industry is undergoing rapid change; several states have enacted new laws recently or are presently considering enacting new ones.

While several current state laws regulating private security are relatively strict, and while nearly every regulatory feature suggested in R-869-DOJ (the summary volume of this series) exists in some state law, no single law presently in force has sufficient scope and quality. In short, no state today has a model law, in our view. A model statute would incorporate the more desirable features of several state and local statutes plus a few not now in any existing law. In our view, California, Connecticut, Delaware, Florida, Illinois, Michigan, New York, Ohio, Texas, and Wisconsin have some of the better statutes, in terms of standards and scope. In contrast, some state statutes are silent on nearly all topics except licensing fees. For example, Alabama, Alaska, Louisiana, and Tennessee appear to have no specific regulation beyond the collection of a business or occupational license fee; this fee ranges from \$25 to a percentage (0.25 percent or 0.5 percent) of the gross business receipts of contract guard and investigative agencies.

The data used in this report were compiled from information provided by governmental officials in

each state. The data were collected between December 1970 and August 1971 by correspondence, by an extensive survey questionnaire sent to state regulatory agencies, and in some cases by personal interview. Copies of each state's laws were obtained and capsule summaries for each state were prepared (see Appendix A). In some cases the information displayed is incomplete because the state regulatory agency was not completely cooperative. Administrative interpretations of the statutes and detailed administrative regulations were not obtained in several cases for similar reasons.

### TERMINOLOGY

To aid in understanding the terms used throughout this report, the following broad descriptions of categories of personnel and businesses are offered. They are intended to be brief and hence are not precise in a legal sense. Within the various city and state laws related to the private security industry, there is little uniformity and much variation in the terms used and intended to describe various security personnel. We found over 60 different titles used to describe security personnel in those statutes. For example, a security guard in one state might be called a special policeman in a neighboring state. We have substituted our terminology in our summaries of the laws, to enhance understanding. The reader is cautioned to refer directly to the full text of any law that is of particular interest to clarify subtle differences between that law's and our definitions.

*Private police*, for the purposes of this study, include all privately employed guards, investigators, patrolmen, alarm and armored-car personnel, and any other personnel performing similar functions.

*Private investigation* includes investigation by a privately employed person for the purpose of obtaining information on

- a. Crimes or wrongs done or threatened.
- b. The identity, habits, conduct, movements, whereabouts, associations, transactions, credibility reputa-

tion, employment history, criminal record, or character of any person, group, or business, for any purpose.

- c. The location of lost or stolen property.
- d. The causes and responsibility for fires, libel, slander, losses, accidents, or injuries.

*Contract investigative agencies* provide private investigative services for a fee; these agencies include partnerships and corporations, as well as individuals who are self-employed.

*In-house investigative forces* provide private investigative services exclusively in connection with the affairs of the one business that employs them.

*Private investigators* are generally personnel who conduct private investigations for a contract investigative agency. Statute definitions of *private investigators* include undercover agents employed by contract agencies, but in-house investigative-force employees are usually excluded. Credit investigators and insurance investigators and adjusters are also generally excluded.

*Credit investigation agencies and investigators* are businesses and persons who conduct investigations primarily to furnish information as to the business and financial standing and credit responsibility of persons, firms, or corporations. These agencies and investigators usually also conduct investigations for noncredit purposes.

*Guards* are persons who protect or attempt to protect persons or property from damage, injury, loss, or any criminal act. Other terms often used to describe such personnel are *watchman*, *security officer*, *protective agent*, *merchant guard*, and *special officer*.

*Patrolmen* perform the same functions as guards but do so at a number of different physical locations; they usually travel (on foot or in a vehicle) on public property between these locations.

*Contract guard or patrol agencies* supply privately employed guards or patrolmen for a fee and include partnerships and corporations, as well as individuals who are self-employed.

*In-house guard forces* provide private guard services exclusively in connection with the affairs of the one business that employs them.

*Armored-transport agencies* provide armed personnel to convey valuable articles for a fee.

*Central station alarm agencies* provide alarm serv-

ices to numerous clients, with each alarm communicating to a central monitoring station. The agency may send a man to the scene of the alarm and/or it may call the public police.

*Special police* generally are defined in statutes as private security personnel who are commissioned by a public agency and given some degree of law-enforcement authority above that possessed by normal citizens. Some private organizations call their guards "special police," but we have not included these guard personnel within the term unless they are commissioned.

*Polygraph examiners* are persons who use any device that records an examinee's physiological data, such as blood pressure, pulse, and breathing patterns, for the purpose of detecting deception.

*Private security agency, force, industry, and personnel* are comprehensive generic terms that are used in this report to include all types of contract and in-house services such as investigation, guard, patrol, lie detector, alarm, armored transport, and the furnishing of security advice.

*Licensing* is the requiring of permission from a specified governmental agency *before* a business or person can lawfully engage in an activity. To obtain a license, minimum qualifications usually must be satisfied. Note that some jurisdictions use the terms *permit*, *commission*, or *appointment* in lieu of the term *license*.

*Registration* is the requiring of a business or person to submit certain information to a specified governmental agency within a specified time *after* beginning to engage in an activity. The governmental agency usually may deny the registration if minimum qualifications are not satisfied. The standards for registration are usually lower than those for licensing. For security personnel, registration typically involves submitting the name and fingerprints of an individual for a police records check to ascertain if he has any convictions for a felony or for a crime involving moral turpitude. (Several states require a police records check by a state agency for each private security employee but do not call the procedure *registration*.)

### STATE REGULATORY AGENCIES

Typically, state-level regulation of the private security industry is conducted by only one agency in each state. However, a regulatory agency that is not a police agency may utilize the criminal records and

investigative personnel of the state's law-enforcement agency. The primary responsible regulatory agencies are shown in Table 1.

**Table 1  
STATE REGULATORY AGENCIES**

Agency	Number of States
Regulatory Board.....	12
Department of Public Safety or State Police.....	10
State Department.....	7
Revenue Department.....	4
Justice Department.....	3
Commerce Department.....	1
County Court.....	1
None.....	12
Total.....	50

Of the 12 states with no state regulatory agency, some explicitly delegate regulatory authority to the cities and/or counties, but most do not mention the security industry in any state statutes. The 38 states that do regulate the industry usually allow additional local regulation, but in a few cases it is expressly prohibited.

The tightest regulation is concentrated in states where a unit of the State Police or a special regulatory board is given the responsibility. The weakest regulation, concentrated in states where the Revenue Department has responsibility, consists of little more than collecting a license tax for the privilege of conducting business.

**Types of Business and Personnel Regulated**

The categories of business and personnel that are regulated vary widely among states. Twelve states do not regulate at all. Some states, such as Alaska, license only contract investigative agencies. Other states, such as Wisconsin, license contract investigative, guard, and patrol businesses, and license or register all employees of contract investigative, guard, and patrol agencies, but do not regulate polygraph examiners and in-house security forces. In contrast, Florida has a very stringent licensing requirement for individual polygraph examiners but does not register employees of contract investigative, guard, or patrol agencies. One of the weak points in many state laws is the complete omission of major categories of security businesses and personnel from regulation. Table 2, which summarizes the categories regulated in each state, reveals some of the gaps in regulation. Note that a

total of 34 states regulate private investigative businesses; 26 regulate guard or patrol businesses; 17 license or register private contract investigative employees; and 12 license or register private contract guards or patrol employees. Twelve states do not regulate any category at the state level, and *no state has mandatory regulation of in-house guards or investigators*. However, in some cases, local jurisdictions impose regulations which fill some gaps. (A sampling of the stronger local regulations is given in Chapter III.)

Businesses that are less numerous than guard and investigative agencies tend to be less regulated, even though they perform significant security functions and are susceptible to many of the same problems as are the guard and investigative segments of the industry. To our knowledge, only 4 states explicitly regulate the central station alarm companies,\* 6 states explicitly regulate armored-transport companies,\* 11 states license polygraph examiners,\*\* 4 states license repossessors, and only 1 state licenses insurance investigators. Several states regulate the special police, who are given some law-enforcement powers not granted to ordinary citizens.

Many categories of private investigators and guards are explicitly excluded from licensing requirements for reasons which are not clear to us. Even though they perform the same types of investigative activities as contract investigators, both insurance and credit investigators are explicitly exempted from licensing in 22 states. Most of the remaining states that license contract investigators implicitly exclude most insurance\* and credit investigators (who work for a single employer and are not "for hire") by licensing only contract investigators and excluding in-house investigators. Similarly, in-house guards are not regulated at the state level, even though they perform exactly the same jobs as contract guards, in many cases. Note that both contract and in-house personnel may have to deal with the public. Thus, current state regulation seems to be aimed not at specific types of security activities or at personnel that make contact with the

\* These services may be included in guard or patrol categories in some additional states.

\*\* An additional 12 states limit or prohibit certain uses of the polygraph. For more details on polygraph legislation than we present in this report, refer to C. Romig, "The Status of Polygraph Legislation of the Fifty States," Parts I, II, and III, appearing in the September, October, and November 1971 issues of *Police*. Romig also makes recommendations for changes in legislation.

\* Insurance laws in some states may provide minimum regulation of insurance company personnel, including investigators.

**Table 2  
TYPES OF REGULATION AT THE STATE LEVEL**

	Licensing of contract security businesses			Licensing or registration of employees of contract security businesses			No State level regulation	Other
	Investigative	Guard	Patrol	Investigative	Guard	Patrol		
Alabama.....	L							
Alaska.....	L							
Arizona.....							√	
Arkansas.....	L			L				License polygraph examiners.
California.....	L	L	L					License certain insurance adjustors, central alarm agencies, armored transport companies, repossessors, and polygraph examiners.
Colorado.....	L							
Connecticut.....	L	L	L	R	R	R		License special police; license armored transport agencies and register their employees.
Delaware.....	L	L	L	R	R	R		License polygraph examiners.
Florida.....	L	L	L					License polygraph examiners and repossessors.
Georgia.....								License polygraph examiners.
Hawaii.....	L	L	L					
Idaho.....							√	
Illinois.....	L	L	L	R	R	R		License polygraph examiners.
Indiana.....	L	L	L	R	R	R		
Iowa.....	L	L	L					
Kansas.....	L							
Kentucky.....								License special police and polygraph examiners.
Louisiana.....	L	L	L					
Maine.....	L							
Maryland.....	L	L	L	R				License special police.
Massachusetts.....	L	L	L					

Table 2 (Cont.)

	Licensing of contract security businesses			Licensing or registration of employees of contract security businesses			No State level regulation	Other
	Investigative	Guard	Patrol	Investigative	Guard	Patrol		
Michigan.....	L	L	L	R	R	R	.....	License special police; license central alarm and armored transport agencies and register their employees.
Minnesota.....	L	L	L				.....	License armored transport agencies.
Mississippi.....							.....	License polygraph examiners.
Missouri.....							√	
Montana.....							√	
Nebraska.....	L	L	L	L			.....	License central alarm, armored transport agencies, and repossessors.
Nevada.....	L		L	R		R	.....	License process servers, repossessors, and polygraph examiners.
New Hampshire.....							√	
New Jersey.....	L	L	L	R	R	R	.....	
New Mexico.....	L	L	L	R	R	R	.....	License polygraph examiners.
New York.....	L	L	L	R	R	R	.....	
North Carolina....	L	L	L				.....	License special police.
North Dakota.....	L	L	L				.....	License polygraph examiners.
Ohio.....	L	L	L	R	R	R	.....	
Oklahoma.....							√	
Oregon.....							√	
Pennsylvania.....	L	L	L	R	R	R	.....	
Rhode Island.....							√	
South Carolina.....	L			L			.....	
South Dakota.....							√	
Tennessee.....	L	L	L				.....	
Texas.....	L	L	L	R			.....	License central alarm, armored car agencies, and polygraph examiners.

Table 2 (Cont.)

	Licensing of contract security businesses			Licensing or registration of employees of contract security businesses			No State level regulation	Other
	Investigative	Guard	Patrol	Investigative	Guard	Patrol		
Washington.....							√	
Vermont.....	L						.....	
Virginia.....							.....	License polygraph examiners.
Washington.....							√	
West Virginia.....	L	L	L				.....	
Wisconsin.....	L	L	L	L	L	L	.....	
Wyoming.....							√	
TOTAL....	34	25	26	17	11	12	12	

L = License  
R = Registration

public but, rather, at the *businesses* that sell security services.

#### Methods of Regulation

Licensing is the method of regulation for private security agencies in all the 38 states that impose any controls. Certain types of employees, usually investigators or polygraph examiners, must be licensed in 14 states; a total of 13 states register certain categories of security employees; the remainder, typically, set standards for employees but play no direct role in the screening of personnel. The registration of employees (submission of employee data to the state for approval) takes a variety of forms. The weakest form of registration requires only that employee fingerprints, without names, be submitted to a state agency for a criminal records check. In New York, New Jersey, and Pennsylvania, state approval of employees is not required, but it is illegal to employ persons convicted of certain crimes. Those states simply notify both the employer and the State Attorney General's office if such a conviction record is discovered through the check of employees' fingerprints. Other states, such as Indiana and Michigan, go a step further and require specific approval by the State Police for continued employment of the person.

Stronger registration requirements, such as those in Connecticut, Delaware, New Mexico, Ohio, Texas, and Wisconsin, specify that detailed data on each employee be submitted to the state regulatory agency. Specific approval of employees is required in those states for continued employment, although the approval in one case consists only of a letter from the local police. In Ohio the state issues an identification card if the employee is approved, and any employee not yet possessing the card may work for a client only if the client is warned that the employee has not yet completed registration.

The registration rules generally specify that employee data must be submitted to the state within a brief time after date of employment. The time periods range from "immediately" to 10 days. Temporary employees are excluded from registration requirements in 3 states.

Only 4 states have mandatory licensing for any contract guards, investigators, or patrolmen, but 11 states license polygraph examiners. Arkansas licenses contract investigative employees if they have been hired for more than 30 days work. Nebraska licenses plainclothes contract investigative employees. South Carolina licenses contract investigators. Wisconsin

licenses contract guards, investigative employees, and patrolmen; however, guards need not be licensed if they are registered by a local jurisdiction.

Several states have discretionary licensing (appointment) of special policemen who are granted legal authority above that possessed by normal citizens. These may be either in-house or contract personnel in most cases.

### Licensing Requirements

The administrative requirements for obtaining a license generally follow a similar format in each state. An application is completed, an investigation is made concerning the applicant, and if he is found to be of "good character, integrity, competency, and ability," he is required to post a bond and is issued the license.

The details of licensing requirements for contract guard, patrol, and investigative agencies and their employees are summarized below. The requirements for other types of security personnel are quite similar to those for contract guards or investigators. Further details on requirements for other categories, such as polygraph examiners, are given in Appendix A, which summarizes the statutes for each individual state.\* These summaries are based on the statutory requirements, which are often supplemented by administratively established rules and regulations. It should not be concluded that a regulation on a certain topic does not exist simply because statutes are silent on that topic. In many cases specific regulations, which are set administratively by the regulatory agency, were not available to us. Thus, numbers appearing in this summary represent lower bounds of the number of states with a particular regulation; the actual number is probably higher.

Typical statutory provisions for a licensee and his employees include the following:

1. A license period of 1 or 2 years is specified.
2. An average licensing fee of \$150 is charged, plus \$3 per employee if registration is required.
3. An average bond of \$6,000 must be posted.
4. A criminal records check of the licensee must be made in all the states that license one or more types of security agencies, and a similar check of each employee is required in half of those states.
5. Grounds for denial usually include a conviction for a felony or crime involving moral turpitude, or not being of "good moral character, integrity, competency, reputation, or honesty."
6. Grounds for revocation usually include all of the grounds for denial plus violation of any regulation or "demonstrated unworthiness or incompetency."

\* Table 2 serves as a guide to Appendix A.

7. No provisions exist concerning how the regulatory agency is to learn of or handle complaints, bond or insurance claims, or court proceedings against a licensee or his employees.
8. Penalties of up to an average of \$1,100 and/or 7 months imprisonment may be imposed for violation of regulations or provisions of the licensing act.
9. No provision exists to grant private security officers special legal police powers not possessed by ordinary citizens.
10. The minimum age requirement for private security officers is 21; there is no maximum age limit.
11. There is a requirement of U.S. citizenship but not of state residency.
12. No minimum level of required education is specified.
13. Prior relevant experience of 2½ or 3 years duration is required for licensees, but none is required for employees.
14. There is no provision for a written examination, except for polygraph examiners.
15. There is no training requirement, except for polygraph examiners.
16. Approved identification cards must be carried, and guard uniforms and badges must not resemble those of the public police.
17. A handgun permit (additional) is mandatory if such weapons are to be carried.
18. Licensing or registration is required for some, but not all, types of contract security employees in about half the states that license some contract security agencies.

*The principal difference between current regulation of private investigative forces and that of private guard forces is not in what detailed regulations are established, but rather in whether any regulations are established at all.* In states that regulate both guard and investigative forces, the regulations for each are, typically, very similar. However, 34 states license contract investigative forces, while only 26 license either contract guard or contract patrol forces.

*The principal differences between the regulation of private security firms and that of employees are much more marked than are the differences between the ways in which different types of firms are regulated.* First, the number of states that regulate firms is twice as large as the number that regulate employees. Second, private security firms are licensed before beginning in business, and at least one person in the firm must meet detailed standards, but employees typically need undergo only a criminal records check after they begin work.

*License periods* between renewals are almost always 1 or 2 years, but some are as long as 5 years. The average is 1.6 years. If employees are registered rather than licensed, they usually are not required by statute to reregister periodically. We did not determine

whether such reregistration is generally required by administrative regulation.

*Fees* are assessed for licensing in most states. These range from \$10 to \$500 for contract investigative, guard, or patrol agencies, but one state charges 0.25 percent or 0.5 percent of gross receipts, depending on the size of the receipts. The average license fees are \$145 and \$154 for contract guard and investigative agencies, respectively. Renewal fees are generally slightly lower, as are fees for individuals with no employees. Registration fees for employees range from zero to \$5; the average fee is \$3 per employee.

*A bond or insurance* is required in 26 states. The 24 states that require bonds set amounts ranging from \$500 to \$400,000, with the average mandatory bonds for contract guard and investigative agencies being \$5,500 and \$6,800, respectively. These bonds normally cover the "faithful and proper" performance of the duties for which the agencies are licensed. In some states, such as California, an action on the bond may be brought by any person to recover damages suffered because of "the willful, malicious, or wrongful act of the principal" or his agent. Michigan requires either a \$5,000 to \$10,000 bond or insurance of \$20,000 for property damage and \$200,000 for personal-injury claims. Ohio requires insurance of \$100,000 for property-damage claims and \$300,000 for personal-injury claims or a \$400,000 corporate bond.

*Investigation of applicants* and screening procedures are not specifically detailed by the statutes. The acts normally do provide that certain background information be provided by the applicant and that an investigation be conducted upon this information. Photographs of license applicants are required by 18 states, and fingerprints are required by 23 states. Twelve states require fingerprints of contract guard employees, and 17 states require them of investigative personnel.

*Criminal records checks* are required for licensees in at least 27 state statutes, and we assume that most of the remainder of the states conduct such an investigation as a matter of course. However, criminal records checks are probably not conducted in those states that only collect a business privilege tax from the security agencies. Eleven states check the record of each employee of all contract guard and investigative agencies.

*Grounds for denial of licenses* are varied; in many

states grounds are characterized by phraseology such as "not of good moral character, integrity, competency, reputation, or honesty." The most common statutory grounds for denial are conviction for a felony or some other specified crime. Convictions are sometimes overlooked if they occurred more than a specified number of years ago—from 5 years (in Wisconsin) to 7 and 20 years (in two other states).

Of course, failure to meet requirements such as bond, age, experience, residence, and training would result in denial of the license. Other grounds are listed in Table 3.

Table 3  
STATUTORY GROUNDS FOR DENIAL OF LICENSES

Grounds	Number of States
Failure to meet standards of age, citizenship, experience, etc. . . . .	31
Not of good character, etc. . . . .	25
Conviction of a felony . . . . .	25
Conviction of a crime involving moral turpitude. . . . .	18
Conviction of specified misdemeanors (usually alcohol, drug, theft, or weapons-related crimes). . . . .	12
Falsified statements on application . . . . .	8
Operating without a license . . . . .	4
Public law-enforcement employee . . . . .	3
Possession of other than an honorable military discharge . . . . .	3
History of mental disorder . . . . .	2

Only one state statute was silent on grounds for denial of a license. Most statutes requiring employee registration also specify that employees cannot have been convicted of certain crimes. Three states specify that except for the experience requirements, employees must meet the same standards as licensees.

*Grounds for revocation of licenses* usually include all of the grounds for denial plus the violation, by the licensee or his employees, of any provision of the licensing law or of any regulation administratively established by the regulatory agency. Other grounds specified in the statutes are listed in Table 4. Administrative interpretations and detailed regulations set by the regulatory agencies are not included, so the number of states listed is probably a lower bound on the actual number that would revoke a license for any specified reason.

**Table 4**  
**STATUTORY GROUNDS FOR REVOCATION OF**  
**LICENSES**

Grounds	Number of States
All of the grounds for denial.....	25
Violation of a provision of the licensing statute or administrative regulations.....	25
Demonstrated "unworthiness" or "incompetency".....	10
Knowingly employing a person not meeting minimum requirements.....	7
Impersonating a public law-enforcement officer..	6
Improper release of privileged information.....	5
Failure to provide services as agreed.....	4
Failure to maintain bond.....	4
Conduct "not in the best interest of the public".."	3
"For cause".....	3
Failure to explain nature and voluntariness of polygraph examination.....	3
Improper advertising.....	2
More than 10% of business owned by a person who cannot meet the character requirements of a licensee.....	1

*Complaints* against private security personnel are specifically mentioned in three statutes. In Wisconsin, a petition signed by six citizens is sufficient to demand a hearing on a complaint. In New Mexico, both the licensee and the bonding company must immediately report any claims against the bond, and all court proceedings, to the state regulatory agency. Michigan requires that the district attorney report all convictions of persons for violation of any provisions of the licensing act.

*Penalties*, in addition to the normal criminal and civil sanctions applicable to all citizens, are usually defined. Licenses may be suspended in 10 states and may be revoked in nearly all licensing states. In Florida, the regulatory agency may impose administrative fines of up to \$100 for infraction of regulations. In 17 states, violation of the provisions of the licensing statute is a misdemeanor. Maximum fines range from \$20 to \$5,000, with maximum imprisonments ranging from 2 months to 1 year; the average fine is \$1,100, and the average imprisonment, 7 months. The stiffest penalty specified provides for up to 5 years imprisonment for falsification of photograph or fingerprints in an application.

*The legal authority* of private security personnel is usually not mentioned in the licensing statute. We interpret this to mean that the powers granted private

security personnel are no greater than those possessed by other citizens. Six states explicitly specify that private security personnel have no special legal authority or powers. Generally, the "special police" (a small percentage of private security personnel) are excepted, since they are commissioned and are thereby granted certain legal powers of a public policeman. The primary added power given special policemen is the authority to arrest. This added power is usually limited to the specified hours and location where the special policeman is on duty. Special-police commissioning, unlike licensing, is not mandatory but is a special privilege granted by the state. For example, Michigan does not require the licensing of in-house guards, but in-house guards may apply for a license which, if granted, grants them special-police powers.

*Age restrictions* for licensees are set by statute at a minimum of 21 years in 16 states, while 9 states specify 25 years as a minimum. Employees are generally required to be at least 21 years old, but 2 states allow 18-year-olds to perform security work if granted special permission by the regulatory agency. We are aware of no state that has a maximum age restriction. The remaining states do not specify age restrictions by statute, but we suspect that in some of those states such restrictions are set administratively.

*U.S. citizenship* is explicitly required by statute for licensees in 22 states. We suspect that some of the other states establish this requirement administratively.

*State residency* requirements are established by 7 states for licensees but not for employees. The length of residency required ranges from zero to 2 years.

*Minimum educational levels* for contract guard, investigative, and patrol agency licensees are typically not specified by statute, although 2 states do require high-school diplomas for licensees and an eighth-grade education for employees. One other state requires literacy for licensees. Two states require high-school graduation and one requires a college degree for polygraph examiners. In some states, college-level education may be submitted for required security experience.

*Required minimum prior work experience* is specified by statute for licensees in 23 states, but prior experience is not required of employees in any state. From 1 to 10 years of experience are required for licensees for contract guard, patrol, or investigative agencies; the average is 3 years for investigative agencies and 2.6 years for guard and patrol agencies. Typically, only one person in the agency management

need satisfy these experience requirements. Thus, he may be only a "front man" to satisfy the statute.

The amount of experience required for investigators may depend on the nature of that experience. For example, a state may require 2 years experience as an investigator for a public law-enforcement agency, or 3 years experience in a public law-enforcement role above the level of patrolman, or 4 years experience as a private investigative employee. Most frequently, however, the investigative experience requirement can be met by having worked the same specified number of years in any public or private investigative capacity. An exception is the New Jersey statute, which recognizes only public law-enforcement experience as satisfactory.

For a polygraph examiner's license, 7 states specify a mandatory 6 to 12 months internship under a licensed examiner. Five other states require up to 5 years experience as an investigator but will accept certain types of Bachelor's degrees as a substitute for experience.

*Written examinations* are required for contract guard and patrol agency licensees in 8 states and for contract investigative agency licensees in 11 states, but exams are not required of a licensee's employees. Seven states conduct examinations of prospective polygraph examiners.

*Training* is generally not mentioned in the statutes. There are exceptions, however: California will be instituting a mandatory weapons-training program for armed personnel; Ohio requires 120 hours of training at an approved school for all private security personnel who must be commissioned by local jurisdiction,\* and for every armed person employed at an educational institution; Vermont requires private investigative agency licensees to pass either an approved training program or a comprehensive examination; and 10 states which license polygraph examiners require graduation from an approved training school and/or 6 to 12 months of internship.

*Uniforms and identification* are regulated by many states, usually with the intent of lessening the chance that citizens will mistake private security personnel for public law-enforcement officers. *Special identification cards* are required for contract investigators in 20 states, and for contract guards in 18 states. Ten states have statutory requirements concerning the

\* Commissioning by cities and counties does not necessarily imply that special-police powers are granted. For details, refer to Appendix B.

*badges* guards may use; typically, such badges must be approved by the regulatory agency or must not resemble a public badge in either appearance or words used (e.g., the word "police" is often prohibited). Nine states specify controls on investigators' badges, with an additional 3 states forbidding any badges for private investigators. Ten states specify that guard uniforms must not resemble those of public officers.

*Special handgun or concealed-weapons permits* are required by many states and typically are not automatically granted with the agency license or employee registration. Most licensing statutes are silent on this point, but 12 indicated that an additional weapons permit must be secured. The fees for the permit ranged from \$2 to \$3, and a bond of \$300 to \$2,000 is required in some states. Two statutes specify that handguns may be carried by employees only while on duty. As indicated earlier, California will require training for all armed employees.

*Special regulations*, in addition to those categories of regulations summarized above, appear in many of the statutes. These rather specific rules each appear in no more than 10 states' statutes, and frequently appear in fewer:

- Licensees must keep written records of all investigative reports for at least 2 years; oral reports must be summarized in writing.
- The regulatory agency may inspect any and all records maintained by licensees.
- Licensees must supply any information related to their business activities at the request of the regulatory agency.
- No local government may impose additional licensing requirements above those imposed by the state.
- Local governments may provide additional regulations beyond those set by the state.
- No licensee or his employee may divulge privileged information obtained in the course of business, except with the client's permission, or on demand of the state regulatory agency, or in response to a court order.
- Licensees may not employ public law-enforcement officers.
- Guard or patrol licensees may not perform investigations, unless they are in direct connection with incidents encountered in providing guard or patrol services.
- Impersonating public law-enforcement officers or misleading persons into believing the licensee is affiliated with a public agency is forbidden.
- False advertising, or any advertising disapproved by the regulatory agency, is forbidden.
- Licensees may not conduct business using any name other than that printed on the license.
- Licensee name and license number must be included in all advertisements.

- Licensees may not accept business that would result in adverse effects for any present or former client because of information possessed by the licensee about that client.
- False reporting and the manufacture of evidence are forbidden.
- Polygraph examiners must tell the subject of the nature and voluntariness of the examination and, if

requested by the subject, must disclose the results of the examination.

- The regulatory agency may waive certain licensing requirements if the applicant is licensed in another state.
- The regulatory agency may adopt additional regulations necessary to implement the intent of the statute.

### III. CURRENT LOCAL LICENSING AND REGULATION

Licensing and regulation of private security at the local level, like that at the state level, is characterized by its lack of uniformity and comprehensiveness. Typically, local laws exclude many types of security businesses and personnel from regulation. Furthermore, according to one survey of city police departments,\* only 54 percent of the cities with population over 25,000 regulate any portion of the private security industry. Some relevant data from the survey are presented in Table 5. Of the types of private security employees considered, special police are most often regulated. Forty-five percent of the survey respondents indicated that certain categories of private security personnel possessed some police powers above those granted to every citizen. We suspect that regulation is less prevalent at the local level than at the state level because localities have been preempted in this field by the states. However, several states specifically authorize additional local regulation beyond that imposed by the states themselves.

While several current local laws are relatively strict, and while nearly every regulatory feature suggested in R-869-DOJ\* is in some local statute, no single law presently in force has sufficient scope and quality to be considered a model statute. However, in our view, Dallas, Denver, Oakland, and St. Louis have some of the better existing statutes, in terms of standards and scope. Both Dallas and Oakland have particularly comprehensive alarm statutes. For example, the Dallas alarm statute specifies stringent and detailed controls on the alarm businesses, on alarm devices, and on operating procedures; but it fails to specify significant controls on the private security personnel that respond to the alarms.

To further illustrate the stricter types of regulations of the private security industry established by cities and counties, we shall describe the statutes of 19 localities. Our information has been compiled primarily from statutes, because in several cases detailed administrative regulations established by the local regulatory agency were not available. The cities and counties selected either were located in states with no regulation at the state level or reportedly had "exemplary" (i.e., strict) regulatory programs. The regulatory agencies in some of these 19 selected localities also responded to Rand's survey\*\* with details of administratively established regulations which do not appear in the local ordinances. The 19 statutes are summarized below. For detailed descriptions, see Appendix B.

Table 5  
LOCAL REGULATION OF PRIVATE SECURITY SERVICES<sup>a</sup>

Item	Percent of respondents
Type of service:	
Guard.....	28
Detective.....	31
Special police.....	43
Private patrol.....	32
Alarm.....	24
Form of regulation:	
Licensing.....	47
Testing.....	4
Screening.....	28
Training.....	13

<sup>a</sup> Source: Post, op. cit.

\* This survey, to which 121 of 357 city police departments responded, is reported in Richard S. Post, "Relations with Private Police Services," *The Police Chief*, March 1971.

#### REGULATORY AGENCIES

The local police departments are responsible for administering the regulations in 15 of the 19 localities. The city manager, comptroller, commissioners, or director of licensing performs this function in the remaining localities.

#### TYPES OF REGULATION

The methods of regulation and the types of busi-

\* The summary report of this series.

\*\* See Chapters IV and V of this report.

ness and personnel regulated are shown in Table 6 for each of the localities. Contract investigative agencies were licensed by 8 localities and 11 of the states in which the 19 localities are located. In 2 of the cities, both the state and the city license these investigative businesses. Contract guard and private patrol agencies were licensed by 10 and 13 localities, respectively, and by 9 of the states in which the 19 cities are located. In 5 cases, both local and state licenses were required by the patrol agency.\*

Some localities regulate in situations where states do not; for example, some localities took a significantly stronger stand than their respective states on the issue of *employee* licensing or registration. Contract investigators were licensed in 6 localities but registered in only 5 of the states in which the 19 cities are located; contract guards were licensed or registered by 10 of the localities but only by 3 of those states; contract patrolmen were licensed or registered by 13 localities but only by 3 of those states. Finally, several cities, but no states, license or register in-house security personnel. Oakland, for example, licenses in-house uniformed or armed security personnel but does not give them special police powers. In contrast, no state has mandatory licensing of in-house guards or investigators.

#### LICENSING REQUIREMENTS

Typically, the specific standards and requirements that personnel must meet are the same for all categories which are licensed or registered in a single locality. Typical statutory provisions for a licensee or his employees in the 19 localities summarized include:

1. A license period of 1 year.
2. A licensing fee of from \$5 to \$250 for agencies, with an average fee of \$57. A fee of \$3 to \$10 per employee, with an average fee of \$7.
3. A mandatory bond of from \$1,000 to \$25,000, with an average bond of \$5,000. One locality requires \$200,000 insurance, but no bond. Another requires \$100,000 bond or insurance.
4. A criminal records check of the security agency manager and all registered or licensed employees.
5. Grounds for denial that usually include a conviction for a felony. Other common grounds are conviction of a crime involving moral turpitude or not being of "good character." One or more localities deny a license for conviction of a misdemeanor, drug addiction, a false statement on the application, a dishonorable military discharge, certain

\* Recall that by *licensing* we mean requiring some form of approval before the agency or personnel may conduct business.

types of arrests, or violation of any regulation of the licensing statute.

6. Grounds for revocation that usually include all of the grounds for denial plus the violation of any regulation. Other reasons are a justified complaint, action not in the public interest, failure to go to the scene of an alarm, or not rendering competent service.
7. Penalties of revocation and from \$100 to \$1,000 maximum fines and/or 2 months to 2 years maximum imprisonment. The average maximum fine and imprisonment were \$400 and 7 months, respectively.
8. Provisions for granting certain types of private security officers special police powers not possessed by ordinary citizens (in 9 of the 19 localities). The exercise of such powers is typically restricted to on-duty hours at assigned locations.
9. A minimum age requirement of 21 years in half the localities, but never a maximum age limit.
10. Citizenship requirements in 9, but residency requirements in only 6 localities.
11. Educational requirements in only 3 of the 19 localities. Literacy or high-school graduation were the two levels specified.
12. Prior relevant law-enforcement or security work experience of 2 or 3 years duration in only 3 localities.
13. A provision for a written examination in one locality.
14. Mandatory training requirements ranging from 5 to 120 hours in length in 4 localities.
15. Requirements that approved identification cards be carried, and that guard uniforms and badges not resemble those of the public police.
16. A mandatory (additional) handgun permit if such weapons are to be carried in 9 localities. Such permits may or may not be required in the remaining localities, but the licensing statutes are silent on this point. Seven localities require a weapons proficiency test. Four allow the loaded gun to be carried on duty only. Five require that every weapon discharge must be reported.
17. The provision that specific regulations may be established by the regulatory agency. The "other information" section of each local statute summarized in Appendix B provides examples of these special regulations. The Dallas alarm statute summary is especially indicative of the detail to which regulations are sometimes specified. Further examples are provided in the "special regulations" section of the state regulation summary in this report.

The differences between state and local regulation are basically twofold. First, approximately half the cities with population over 25,000 regulate some aspect of the industry, but about 70 percent of all states regulate the industry. Second, cities tend to regulate categories of the security industry not regulated by the states. In general, it appears that state and local regulations complement each other.

Table 6  
TYPES OF REGULATION AT THE LOCAL LEVEL

Locality	Licensing of contract security businesses			Licensing or registration of contract security employees			Other
	Investigative	Guard	Patrol	Investigative	Guard	Patrol	
Birmingham, Ala. ....	SL, LL			LL			City commissioning of private policemen.
Tucson, Ariz. ....	LL	LL	LL				City licensing of alarm and armored-transport agencies.
Los Angeles, Calif. ....	SL	SL	SL, LL			LL	City licensing of alarm agencies and employees.
Oakland, Calif. ....	SL	SL, LL	SL, LL		LL	LL	City licensing of alarm agencies and employees, and uniformed or armed in-house guards and investigators.
San Jose, Calif. ....	SL	SL	SL, LL			LR	
Denver, Colo. ....	SL	LL	LL		LL	LL	City licensing of in-house guards, central station alarm, and armored-transport agencies and employees.
Miami, Fla. ....	SL, LL	SL, LL	SL, LL		LR	LR	City appointment of special police.
Baltimore, Md. ....	SL	SL	SL	SR			City appointment of special police.
Kansas City, Mo. ....	LL	LL	LL	LL	LL	LL	
St. Louis, Mo. ....	LL	LL	LL		LL	LL	City licensing of in-house guard personnel and alarm and armored-transport personnel.
St. Louis County, Mo. ....				LL	LL	LL	City licensing of in-house guard, patrol, and investigative personnel.
Newark, N.J. ....	SL	SL	SL	SR	SR	SR	City appointment of special police.
New York, N.Y. ....	SL	SL	SL	SR	SR	SR	City appointment of special police.
Cleveland, Ohio. ....	SL	SL	SL	SR	SR	SR	City appointment of special police.
Oklahoma City, Okla. ....		LL	LL		LL	LL	City licensing of alarm and armored-transport agencies and their armed employees.
Dallas, Tex. ....	SL	SL	SL, LL	SR		LL	City licensing of alarm companies; in-house guards or patrolmen also may be licensed, but such a license is not mandatory.
King County, Wash. ....	LL	LL	LL	LL	LL	LL	
Seattle, Wash. ....	LL	LL	LL	LL	LL	LL	
Washington, D.C. ....	LL	LL	LL	LL	LL	LL	City appointment of special police.

SL: State licensing.  
LL: Local licensing.  
SR: State registration.  
LR: Local registration.

## IV. REGULATORY AGENCY EXPERIENCE: PROBLEMS AND SANCTIONS

### SURVEY DESCRIPTION

Thirty-one states and many U.S. cities and counties have public agencies responsible for regulation of the private security industry. These agencies typically establish administrative rules and regulations to implement the statutes, receive and screen applications for licenses, handle complaints, and take punitive action when necessary by suspending or revoking licenses or by seeking criminal prosecution. Thus, these regulatory agencies were an important source of information leading to our recommendations for changes in the regulation of the industry.

To tap this source of information and experience, we surveyed those agencies in 31 states, 3 counties, and 46 cities that regulate private security. Cities selected were either in states with no regulation at the state level or in states that reportedly had exemplary regulatory programs. The survey, conducted by mail questionnaire, was preceded by a letter from the Acting Director of the U.S. Department of Justice's National Institute of Law Enforcement and Criminal Justice, seeking cooperation. Approximately one month after the initial mailing, a follow-up reminder letter went to those who had not yet responded. Copies of the questionnaire and mailing list appear in Appendixes C and D.

The survey covered current statutes, numbers and types of businesses and personnel regulated, number and nature of complaints against the security industry and its employees, and the numbers of, and reasons for, license denials, revocations, or other penalties. Finally, we asked for each agency director's views and recommendations regarding improvements or alternatives to current provisions and methods of regulation. Despite the length of the questionnaire—20 pages—the response rate was a gratifying 52 percent (see Table 7). Many of the respondents elaborated on their answers, further indicating their high level of interest in regulatory improvements. Unfortunately, and perhaps significantly, several agencies indicated they could not respond because of lack of available personnel to complete the questionnaire.

Table 7  
REGULATORY AGENCY SURVEY RESPONSE RATE

Regulatory level	Number of questionnaires	
	Sent	Returned
State.....	31	18
Local.....	49	24
Total.....	80	42

### OVERVIEW

We have drawn four main implications from the survey responses. First, the regulatory agencies' effectiveness is limited because they typically have very little reliable data on the private security industry's problems. With the exception of reviewing license applications, the typical regulatory agency has very limited, and in some cases, no contact with the industry. Second, the agencies' effectiveness is limited because they very seldom use the postlicensing powers they have to correct problems in the industry. Suspensions, revocations, and fines are rare. We do not mean to say the regulatory agencies fail to take action in specific situations that come to their attention. Rather, the agencies have such limited resources and such ineffective channels for learning of problems that most problem situations do not come to their attention. Hence, controls are very rarely exercised. Third, there are wide variations in toughness of enforcement of the regulations among regulatory agencies. And fourth, nearly every regulatory agency responding to our survey recommended that some aspect of the regulation of the industry within its state be *stronger* than it presently is. Details of those recommendations are presented in Chapter V.

There is an apparent inconsistency between the rather strong recommendations offered by the regulatory agencies with respect to future regulation and the rather weak enforcement of present regulations. We

speculate that the current enforcement is weak because of limited resources and lack of effective information channels for learning of problems. We view licensing and related regulation as a viable but undernourished means for controlling the private police industry.

The remainder of this section provides detailed information on regulatory agency activity.

### NUMBERS AND TYPES OF LICENSES

The information on numbers and types of licenses issued in the 17 states that responded to our survey is summarized in Table 8. A total of 6,345 licenses are currently in effect in these states—an average of 373 licensees per state. The numbers of licensees range from 17 in North Dakota to 2,271 in California. In 1970, these same states issued an average of 32 new licenses for every 100 currently valid licenses. The states reported 3,502 current contract investigative agency licenses, 1,448 contract guard or patrol agency licenses, 1,596 contract investigative employee licenses, and 1,975 special police licenses. The contract investigative agencies, which account for the largest number of licenses, typically employ very few personnel each.

The 24 responding cities and counties have 24,604 licenses currently in effect, with an average of 1,025 per locality. In 1970, these localities issued an average of 51 licenses per 100 currently valid licenses. The localities reported 69 contract investigative agency licenses, 299 contract guard or patrol agency licenses, 372 contract investigative employee licenses, 10,262 contract guard or patrolman licenses, and 9,015 special police licenses or registrations. Since the predominance of the reported local licenses and registrations are for employees, it appears that average annual employee turnover probably exceeds 51 percent in those localities. Although the state licenses are usually issued to agencies, rather than individuals, there is still a relatively high new-license rate—32 percent. This compares to a much lower 4.7 percent net annual growth rate between 1958 and 1967 for the total number of contract security establishments in the United States.

### LICENSE DENIALS

In 1970, the proportion of license denials (i.e., the percentage of the applications denied) varied markedly among states, indicating an apparent large difference in "toughness" of applicant screening. The

minimum denials were in North Dakota and California, with 0 percent and 6 percent, respectively. The highest percentages (42 percent) were reported in Indiana and Nevada. The average denial rate in the states reporting was 20.3 percent. A total of 258 licenses were denied by these states in 1970. The overall denial rate in all reporting states was 15.3 percent. The difference between the 15.3 and 20.3 percent rates is due to the relatively higher denial rates observed in states with fewer license applications. The average denial rate in the cities reporting was 16.2 percent. Overall, the cities reported a total of 658 denials in 1970, for a denial rate of 6.0 percent. Again, the cities with a higher volume of applications tend to have lower denial rates. This may imply that high volume of license applications means higher workload per agency employee, making it impossible to conduct a thorough background investigation of each applicant.

Reasons for license denial were reported by 14 states and 18 cities. The most prevalent reason was the criminal record of the applicant (9 states and 18 cities). Other major reasons are "lack of character," insufficient experience, failure to obtain bond, and falsified applications. Vague and subjective grounds for denial, such as "lack of character" (or some similar wording), was cited in 14 states and cities. The fact that 13 states and cities reported falsified applications illustrates the need for thorough investigation of each applicant. Full details on numbers of and reasons for denials are given in Table 9.

### ROUTINE MONITORING AND INVESTIGATION OF LICENSEES

Eleven regulatory agencies indicated that they do some checking on private security agencies and personnel after licenses are issued and without receiving a specific complaint. Maryland, Michigan, and the city of St. Louis appear to have the best monitoring programs; they all conduct random unannounced inspections of the licensees' offices, books, and personnel at work locations. Florida conducts "regular inspections"; New Jersey periodically inspects licensees' offices; California checks on repossessors; and Delaware, City A,\* Salem (Oregon), Dallas (Texas), and King County (Washington) check employees on the job.

\* Three cities surveyed (designated A, B, and C) requested anonymity.

Table 8  
REGULATORY AGENCY SURVEY: NUMBER AND TYPE OF LICENSEES

Jurisdiction	Number of licenses in effect	Number of new licenses issued			1970 new licenses as percent of total licenses	Category of licensee						
		1968	1969	1970		Contract investigation agency	Contract guard or patrol agency	Contract investigative employee	Contract guard or patrolman	Special police	Other	
<b>States:</b>												
California.....	<sup>a</sup> 2,271	279	327	429	19	1,359	417					370 insurance adjusters. 125 repossessors.
Connecticut.....	97	6	16	10	10	15		42				
Delaware.....	31	3	0	10	32							
Florida.....	711	148	151	172	24	402	205					104 ploygraph examiners.
Indiana.....	142	NA	27	26	18							
Iowa.....	100	NA	NA	NA								
Kentucky.....	<sup>o</sup> 147	176	268	<sup>o</sup> 313						147		
Maryland.....	155	NA	NA	NA		155		1,232		1,826		
Michigan.....	359	140	201	163	45	158	188			2		5 armored-car companies. 6 alarm companies.
Minnesota.....	93	NA	NA	9	10	<sup>d</sup> 93	<sup>d</sup> 93					
Nebraska.....	524	NA	NA	NA		36		72				423 collection agencies and men.
Nevada.....	55	NA	3	15	27							
New Jersey.....	312	27	32	52	17	<sup>d</sup> 312	<sup>d</sup> 312					
New York.....	957	72	99	107	11	849	108					
North Dakota.....	17	8	12	10	59							
Ohio (Peace Officer Training Council).....	NA	<sup>b</sup> 392	<sup>b</sup> 932	<sup>b</sup> 970								
Texas.....	327			265	81	76	125	250				
West Virginia.....	47					47						
<b>Total Reported...</b>	<b>6,345</b>	<b>1,251</b>	<b>2,068</b>	<b>2,551</b>		<b>3,502</b>	<b>1,448</b>	<b>1,596</b>		<b>1,975</b>		
<b>Average Reported.</b>	<b>373</b>	<b>125</b>	<b>173</b>	<b>182</b>	<b>32</b>	<b>318</b>	<b>206</b>	<b>399</b>		<b>658</b>		

Cities and counties:												
Birmingham, Ala.....	21	NA	NA	2	10							
Los Angeles, Calif.....	1,789	2,272	2,368	2,348	131							
Oakland, Calif.....	<sup>e</sup> 63	9	20	21	33		90		1,141			90 alarm companies. 52 alarm companies (176 men). 1,363 in-house and contract guards.
San Jose, Calif.....	<sup>f</sup> 539						11					
San Diego Co., Calif.....	12		1	2	17			12				
San Diego Co., Calif.....	585	162	291	358	61			35		550		
Denver, Colo.....	1,505	NA	22	539	36			30		1,234		241 in-house guards.
Wichita, Kans.....	462	356	393	424	92							
Baltimore, Md.....	672											
Kansas City, Mo.....	<sup>o</sup> 119	<sup>o</sup> 11	<sup>o</sup> 15	<sup>o</sup> 19	16					98	813	672
St. Louis, Mo.....	<sup>f</sup> 1,375	<sup>f</sup> 290	<sup>f</sup> 244	<sup>f</sup> 653	48							464
St. Louis, Mo.....	2,547	NA	774	1,173	46				5	1,509	50	50 armored-car personnel. 897 in-house guards. 36 alarm personnel. 402 in-house guards.
St. Louis Co., Mo.....	800	210	190	266	33					373	59	
Newark, N.J.....												
Cleveland, Ohio.....	1,108	NA	NA	260	23							
Oklahoma City, Okla.....	<sup>o</sup> 26											
Oklahoma City, Okla.....	<sup>f</sup> 290	NA	NA	400	127							
Salem, Ore.....	29	25	30	32	110		2	1	2	24		
Pittsburgh, Pa.....	NA	NA	NA	NA								
Dallas, Tex.....	3,000	NA	1,594	1,984	66			65		2,495		295 in-house guards. 91 armored-car personnel. 49 alarm personnel.
Richmond, Va.....	300	50	50	100	33	10						
Seattle, Wash.....	1,410	1,100	1,367	1,362	97	38	17	155	1,195		300	1 armored-car company. 4 alarm companies.
King County, Wash.....	<sup>o</sup> 220	185	135	<sup>o</sup> 420								
Washington, D.C.....	112	30	34	18	16		4	29				
City A.....	30	2	2	3	10		15	9	112	931		
City B.....	<sup>o</sup> 140	400	380	<sup>o</sup> 405								3 armored-car agencies. 3 alarm agencies.
City C.....	7,450	992	1,179	1,455	20						20	
<b>Total Reported...</b>	<b>24,604</b>	<b>6,094</b>	<b>9,089</b>	<b>12,244</b>		<b>69</b>	<b>299</b>	<b>372</b>	<b>10,265</b>	<b>9,015</b>		
<b>Average Reported.</b>	<b>1,118</b>	<b>435</b>	<b>505</b>	<b>583</b>	<b>51</b>	<b>14</b>	<b>30</b>	<b>75</b>	<b>1,027</b>	<b>1,287</b>		

<sup>a</sup> 14,000 unarmed and 9,000 armed personnel are employed by licensees.  
<sup>b</sup> Training certificates only (required for new licensees).  
<sup>c</sup> Possible error in survey responses.  
<sup>d</sup> Includes both contract guard and investigative agencies.  
<sup>e</sup> Businesses.  
<sup>f</sup> Men.  
 NA: Data not available.





Table 11  
REGULATORY AGENCY SURVEY: NUMBER OF 1970 COMPLAINTS BY TYPE

Area	Killing a person	Shooting	Assault, excess force	False arrest	Improper detention	Slander	Defamation of character	Malicious prosecution	Trespassing	Impersonating public officer	Improper uniform or I.D.	Improper search	Improper interrogation	Breaking and entering	Bugging or wiretapping	Invasion of privacy	Offensive language	Negligence in duties	Extortion	Theft	Drunkenness	Access to police records	Failure to serve	Misrepresenting service or fee	Entry by deceptive means	Conviction of crime	Franchising license	Unlicensed operation	Violation of gun regulation	Violation of regulations	
<b>States:</b>																															
California.....	1	2	1		1			1	2	6			1		3		1	1			2	2	12	7	1	9	8		3		
Connecticut.....																				1			1								
Delaware.....																															
Florida.....		8							3	15			1	3								1	5	13	3						
Indiana.....																															
Iowa.....																															
Kentucky.....																															
Maryland.....																															
Michigan.....	3	9	3			2			4	14		1		3	3	1	1		1	3	2	7	1	1			11	18	1		
Minnesota.....																															
Nebraska.....																															
Nevada.....																															
New Jersey.....																															
New York.....											2											13									
North Dakota.....									1																						
Ohio (Peace Officer Training Council).....																															
Texas.....																															
West Virginia.....																															
<b>Total Reported.....</b>	<b>4</b>	<b>19</b>	<b>3</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>10</b>	<b>37</b>	<b>0</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>6</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>13</b>	<b>5</b>	<b>18</b>	<b>25</b>	<b>21</b>	<b>5</b>	<b>9</b>	<b>8</b>	<b>11</b>	<b>21</b>	<b>3</b>	
<b>Cities and counties:</b>																															
Birmingham, Ala.....																															1
Los Angeles, Calif.....		6	2						5									1	1	2		2	1								
Oakland, Calif.....																															
San Jose, Calif.....																															
San Diego Co., Calif.....																															
Denver, Colo.....											1																				
Wichita, Kans.....																2															
Baltimore, Md.....																															
Kansas City, Mo.....																															
St. Louis, Mo.....	1	26	5						1	1										3											1
St. Louis Co., Mo.....									3	300										4											300
Newark, N.J.....																															
Cleveland, Ohio.....	1					3																									
Oklahoma City, Okla.....																															
Salem, Oreg.....				2																											
Pittsburgh, Pa.....									4		1	1																			
Dallas, Tex.....	2	2	3														2														10
Richmond, Va.....									10	30			2					10	4	3				5							100
Seattle, Wash.....																															
King County, Wash.....		1																													
Washington, D.C.....																															
City A.....		1																			1		1	1							
City B.....									1																						
City C.....																															
<b>Total Reported.....</b>	<b>4</b>	<b>36</b>	<b>10</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>24</b>	<b>332</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>9</b>	<b>11</b>	<b>4</b>	<b>16</b>	<b>7</b>	<b>0</b>	<b>4</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>411</b>	

## NUMBER OF COMPLAINTS AGAINST LICENSEES

Five of the 17 states responding to the survey did not have data available on the number and nature of complaints against licensees. Another 3 states, Delaware, Iowa, and Minnesota, reported they had not received any complaints against licensees in 1970! The remainder of the states responding reported a total of 369 complaints in 1970, or an average of 31 complaints per reporting state. The proportion of complaints, as a percentage of licensees, ranged from 0 percent in the 3 states with no complaints to 18 percent, in Michigan. The average complaint rate against licensees was 6 percent in the reporting states. This does not imply that over 94 percent of the licensees are perfect, but rather that the number of complaints reaching the regulatory agency averages 6 per 100 licensees per year in the reporting states. We suspect that the actual number of situations where a complaint could be justifiably registered is considerably higher than the reported number. There may be several reasons for this, including (1) inadequate information channels from potential complainants to the regulatory agency; (2) lack of public knowledge as to the limitations of the authority of private security personnel; and (3) handling of complaints via the normal channels of the local police, rather than by regulatory personnel.

Since we are concerned about the number of actual problems in the industry, rather than the reported numbers, we asked the regulatory agencies to estimate the number of unreported incidents where a complaint would have been justified. The six that ventured an estimate said that there were 27, 1, 2, 2, 2, or 3 times as many unreported as reported incidents.

Of the 24 local regulatory agencies surveyed, 7 reported no data available, 3 reported no complaints, and the remainder reported a total of 841 complaints (an average of 53 per reporting agency). The total reported complaints amounted to 4.3 percent of the number of licensees. St. Louis reported the highest rate, 25 justified complaints per 100 licensees. However, only 41 of the 644 complaints in St. Louis were regarded as requiring major action by the regulatory agency. Full details of complaints reported to each agency are found in Table 10 (pp. 22-23).

## TYPES OF COMPLAINTS AGAINST LICENSEES

Each regulatory agency was asked to list the 5 most prevalent types of complaints received against licens-

ees. Their responses are shown in Table 10. The two types of complaints cited most often were

- Impersonating a public law-enforcement officer
- Failure to perform services as agreed

Other frequently cited complaints were improper uniform or identification, improper conduct, use of excessive force, operating an unlicensed business, misrepresentation of fees, and "violation of regulations."

The numbers of complaints of each type received by the regulatory agencies are given in Table 11 (pp. 24-25). Note that only 17 of the 42 responding agencies were able to present a detailed breakdown of the types of complaints received. Such data are simply not collected and used by most of those agencies. However, for those few agencies reporting, the most common complaints were "violation of regulations" (413), improper uniform or I.D. (369), shootings (55), impersonating a police officer (34), theft (29), failure to serve as agreed (29), misrepresentation of service or fees (28), violation of gun regulation (22), illegal access to police records (18), assault (13), negligence (13), operating an unlicensed business (13), drunkenness (12), conviction of a crime (9), offensive language (8), and killings (8). Clearly, the numbers of complaints reported by the regulatory agencies are far less than the number of incidents that occur. Gordon Bishop, the Director of the California State Bureau of Collection and Investigative Services, has pointed out that the reported volume of complaints per individual licensed or employed in the security industry is low.\* He was uncertain as to whether this meant that the industry is "performing that faultlessly" or that people are unaware of complaint channels. The Bureau receives virtually no complaints regarding guard and patrol services from the public or from purchasers of the security services. Such complaints come from competitors and occasionally from a local police department irritated with some aspect of the private security service. Mr. Bishop indicated that he had some reason to believe that with over 9,000 armed men on duty in the state, shooting incidents do occur. However, very few are reported to the Bureau. In addition, he further speculated that dozens of unreported incidents of improper conduct by investigators occur monthly in connection with insurance fraud cases, but very rarely is an investigator convicted. In Los Angeles alone, a local newspaper reported that 3 people were killed by security guards in a recent 3-month time span. Nevertheless, the types of complaints registered are probably indicative of the major types of abuses occurring.

\* Private communication.

## UNLICENSED PERSONS ENGAGED IN PRIVATE SECURITY ACTIVITIES

Regulatory agencies learn of unlicensed persons illegally engaged in the security business primarily from the local police or from licensed competitors within the industry. Table 12 indicates other sources of information.

Table 12  
SOURCES OF INFORMATION ON UNLICENSED SECURITY BUSINESS OPERATION

Source	Number of regulatory agencies reporting using source
Public police.....	21
Competitor licensees.....	20
Advertising.....	9
Citizens.....	8
Complaints.....	3
Clients.....	2
Regulatory agency investigation.....	2
Yellow Pages of phone book.....	1
News.....	1
Industry watchdog group.....	1
Court records.....	1

Table 13  
SOURCES OF COMPLAINTS ABOUT PRIVATE SECURITY ACTIVITIES

Source	Number of regulatory agencies citing source
Citizens.....	23
Public police.....	16
Competitor licensees.....	11
Security clients.....	6
Government agencies.....	5
Telephone.....	5
D.A. or courts.....	3
Lawyers.....	2
Newspapers.....	2
Security employees.....	2
Industry watchdog group.....	2
Fingerprint checks.....	1
Arrests.....	1
Anonymous.....	1
Better Business Bureau.....	1
Inspection by regulatory agency.....	* 1

\* St. Louis.

## SOURCES OF COMPLAINTS

Regulatory agencies were asked to report the 5 most prevalent sources of complaints. The 3 most frequently cited sources were citizens, the public police, and competitive licensees. Table 13 lists the other sources reported.

Lawyers were cited as sources of complaints only twice, but citizens were cited 23 times. It may be that citizens who think they have been abused try to handle matters by themselves rather than turning to a lawyer. Also, the telephone was cited as a source 5 times and thus appears to be a significant information channel on which complaints should be accepted.

## CATEGORIES OF LICENSEES RECEIVING COMPLAINTS

In listing the 5 categories of licensees receiving the most complaints, regulatory agencies cited contract guard agencies and personnel most often, followed by contract patrol and contract investigative businesses and personnel. It is not at all surprising that these categories receive the most complaints, because they are the most often regulated. While more investigative than guard licenses are issued, guard agencies have more personnel, and hence more exposure, than do investigative agencies. This would help explain why guard agencies receive the most complaints. Table 14 contains the detailed responses from each regulatory agency.

## SUMMARY OF DISPOSITION OF 1969 COMPLAINTS IN SELECTED JURISDICTIONS

Since summary statistics sometimes obscure significant details, each regulatory agency surveyed was asked to provide detailed data on the disciplinary actions taken on up to 50 complaints received in 1969. In Table 15 we encapsulate the data received from 2 states and 3 cities. Two major points should be noted: (1) the disciplinary actions taken in many instances seem very lenient in comparison with the offense, and (2) considerable variation in toughness exists among regulatory agencies. The disciplinary sanctions imposed by all responding regulatory agencies are summarized below.

### Bond and Insurance Claims

Since many of the licensing statutes require that licensees obtain insurance or a bond, we inquired about the number of times claims are paid. Only 3

of the 42 responding regulatory agencies were able to supply any information on claims paid. North Dakota reported no such claims paid; California reported receiving 1 or 2 inquiries per week for the name of the bonding agent; and Michigan reported 1 known payment of \$460,000 for an assault. In short, the regulatory agencies are totally uninformed as to how well this method of redress works in practice. Such information would not only be useful but costs little to obtain.

### License Suspensions

Regulatory agencies seldom invoke suspensions as a sanction against licensees or to protect the public during the investigation of a complaint. Thirty states and localities reported a total of only 45 license suspensions in 1970. These temporary suspensions ranged from 2 weeks to 6 months duration, and averaged about 3 months. They were typically imposed because of the arrest of the licensee, termination of bond or insurance, or for violation of regulations such

Table 14  
REGULATORY AGENCY SURVEY: CATEGORIES OF LICENSEES RECEIVING COMPLAINTS

Area	Contract investigator	Contract guard	Contract patrol	Alarm agency	In-house investigator	In-house guard	Repos-sessor	Special police	Ar-mored car
States:									
California.....	✓		✓				✓		
Connecticut.....									
Delaware.....									
Florida.....		✓	✓						
Indiana.....									
Iowa.....		✓							
Kentucky.....		✓				✓			
Maryland.....									
Michigan.....	✓	✓	✓						
Minnesota.....									
Nebraska.....	✓								
Nevada.....									
New Jersey.....									
New York.....	✓	✓					✓		
North Dakota.....									
Ohio (Peace Officer Training Council).....									
Texas.....	✓								
West Virginia.....									
Total Reporting.....	5	5	3	0	0	1	2	0	0
Cities and counties:									
Birmingham, Ala.....			✓						
Los Angeles, Calif.....		✓	✓	✓		✓			
Oakland, Calif.....			✓	✓		✓			
San Jose, Calif.....									
San Diego County.....									
Denver, Colo.....		✓							
Wichita, Kans.....									
Baltimore, Md.....								✓	
Kansas City, Mo.....	✓	✓	✓						
St. Louis, Mo.....		✓							

Table 14 (Cont.)

Area	Contract investigator	Contract guard	Contract patrol	Alarm agency	In-house investigator	In-house guard	Repos-sessor	Special police	Ar-mored car
St. Louis County.....									
Newark, N.J.....									
Cleveland, Ohio.....									
Okla. City, Okla.....									
Salem, Oreg.....			✓						
Pittsburgh, Pa.....									
Dallas, Tex.....		✓							
Richmond, Va.....				✓		✓			
Seattle, Wash.....								✓	✓
King County, Wash.....									
Washington, D.C.....									
City A.....	✓	✓		✓					
City B.....									
City C.....									
Total Reporting.....	2	6	5	4	0	3	0	2	1

as impersonating public law-enforcement officers. Total suspensions were 0.3 percent of total licensees and 5.2 percent of total complaints for the 13 reporting states as a group. Overall, the 17 reporting localities had suspensions equal to 0.12 percent of licensees and 3.4 percent of total complaints. Details for each reporting regulatory agency are presented in Table 16.

### License Revocations

The revocation of licenses is seldom invoked by regulatory agencies. The 29 reporting agencies revoked 116 licenses in 1970. However, 17 of the agencies reported no revocations. Four agencies—Michigan (7), St. Louis (67), Los Angeles (17), and Kansas City (7)—accounted for 84 percent of all the reported revocations. Taken as a group, the reporting states revoked 0.3 percent of the licenses in 1970, with total revocations equaling 4.0 percent of total complaints. The reporting local agencies revoked 0.9 percent of the licenses in 1970, with total revocations equal to 14 percent of total complaints. Reasons for revocations included breaking and entering, false reporting, extortion, felony conviction, falsification of application, wiretapping, interfering with or impersonating the public police, unethical conduct, use of excess force, fraud, drunkenness, improper conduct, bond revocation, assault, arrest for a major crime, and

repeated rule violations. Details are provided in Table 17.

### FINES AND IMPRISONMENT OF LICENSEES

Seventeen of the 42 responding regulatory agencies said that information on fines or imprisonment of licensees was not available in their offices. Since these fines are almost always\* imposed by the courts rather than the regulatory agency, such lack of information is understandable. However, such information would certainly be of value in deciding to renew (or revoke) a license.

Twenty-two regulatory agencies reported a total of 20 fines imposed in 1970. They ranged from \$50 to \$500 and averaged \$167 and \$67 in the reporting states and localities, respectively. Fines were most often imposed for conducting an unlicensed business or for violation of a licensing statute regulation such as the prohibition against impersonating the public police, or use of unapproved uniforms. Taken as a group, the reporting states fined 0.3 percent of the licensees in 1970. Total fines numbered 3.9 percent of total complaints reported by the states. In the reporting localities, fines numbered 0.05 percent of licensees

\* We are aware of only one state that permits fines to be imposed by the regulatory agency.

Table 15  
REGULATORY AGENCY SURVEY: DESCRIPTION AND DISPOSITION OF COMPLAINTS IN SELECTED JURISDICTIONS

Jurisdiction	Nature and number of complaints	Category of licensee complained against	Typical disciplinary action taken
Do.....	Fail to provide service (10).....	Contract investigator.....	Warning.
Do.....	Unlicensed (15).....	All categories.....	Unfounded complaints.
Do.....	Unlicensed (30).....	do.....	Warning.
Do.....	Negligence in duties (11).....	do.....	Warning.
Do.....	Violation of regulations (10).....	do.....	Warning.
Do.....	Continue to operate unlicensed (1).....	Contract investigator.....	\$100 fine.
Do.....	Improper advertising (3).....	do.....	Warning.
Michigan.....	Impersonate police (4).....	Contract guard.....	\$75 fine.
Do.....	Improper advertising (2).....	do.....	\$200 fine.
Do.....	Assault and battery (21).....	do.....	\$50 fine.
Do.....	Gun law violation (33).....	do.....	Charges reduced or dismissed.
Do.....	Drunkenness (5).....	do.....	\$25 fine.
Do.....	Badge or uniform violation (4).....	do.....	\$35 fine.
St. Louis.....	Excess force, assault (1).....	do.....	Revoke license.
Do.....	Violate firearms regulation (2).....	do.....	Require retraining or revoke license
Do.....	Commit crime (3).....	do.....	Revoke license.
Do.....	Conduct unbecoming (4).....	do.....	Revoke license.
Salem, Oreg.....	Violate firearms regulation (1).....	Contract investigator.....	Reprimand.
Do.....	Passes stolen property (1).....	do.....	Jail sentence.
Do.....	Illegal search, impersonate police (1).....	Contract patrol.....	Revoke license.
Dallas, Tex.....	Impersonate police (4).....	Contract guard.....	Fined.
Do.....	False crime reporting (1).....	do.....	Fired by employer.
Do.....	Fail to provide services (several).....	do.....	Warning.
Do.....	Operate unlicensed (several).....	do.....	Registered.
Do.....	Excess force, assault (2).....	do.....	Revoke license.
Do.....	Violate firearms regulation (4).....	do.....	Fine or revoke license.
Do.....	Drunkenness (2).....	do.....	Fined.
Do.....	Badge or uniform violation (several).....	do.....	Warned.
Do.....	Theft (4).....	do.....	Revoke license.
Do.....	Commit crime (3).....	do.....	Fined.
Do.....	Interfere with arrest (1).....	do.....	Fined, license revoked.

and 0.7 percent of complaints. Michigan and Dallas reported the highest number of fines (5 each). See Table 18 for details.

Only 3 regulatory agencies reported any sentences imposed on licensees or their employees: St. Louis (3 sentences of 6 to 12 months duration were imposed for gun-law violations or working on a suspended license), Salem, Oregon (1), and Dallas (1 licensee received 2 years probation).

Table 19 contains the detailed responses from the regulatory agencies.

**OTHER TYPES OF DISCIPLINE BY REGULATORY AGENCIES**

Each agency surveyed was asked if any disciplinary actions were taken other than suspensions, revocations, fines and imprisonment. Reprimands were reportedly used by City A, Oakland, St. Louis, California (50 per year), Florida, Iowa, Maryland, Michigan, Nebraska, North Dakota, and New York (10 per year for failure to register employees or failure to report to clients). St. Louis may require retraining of the employee. The head of the Denver, Colorado, regula-

Table 16  
REGULATORY AGENCY SURVEY: LICENSE SUSPENSIONS

	Number suspended			1970 sus- pensions as per- cent of total licen- sees	1970 sus- pensions as per- cent of total com- plaints	Length of suspensions (month)	Reason for suspensions
	1968	1969	1970				
States:							
California.....	6	5	3	0.1	3	1	Pose as police, fail to serve, fraud, violate regulation, commit minor crime.
Connecticut.....	1	1	0	0	0	½	Labor or wage law violation.
Delaware.....	0	0	0	0	0		
Florida.....	NA	NA	NA			3 to 6	
Indiana.....	NA	NA	NA				
Iowa.....	0	0	0	0	0		
Kentucky.....	NA	NA	0	0	0		
Maryland.....	NA	1	2	1.3	15	3	Violate regulation, unethical conduct.
Michigan.....	0	2	5	1.4	8	1	Insufficient insurance.
Minnesota.....	0	0	0	0	0		
Nebraska.....	0	0	0	0	0		
Nevada.....	3	1	1	1.8	50		Went out of business, bond expired.
New Jersey.....	1	0	1	0.3		6	False report, employ criminal, violate gem law.
New York.....	4	6	4	0.4	4	6	Violate regulations, falsify applica- tion, fraud, demonstrated incom- petence or unworthiness.
North Dakota.....	0	0	0	0			
Ohio (Peace Officer Training Council).....							
Texas.....	NA	NA	NA				
West Virginia.....							
Total reported....	15	16	16				
Average reported..	1.4	1.3	1.2	.4	.8, 9	3.1	
Cities and counties:							
Birmingham, Ala. ...	NA	NA	0	0	0		
Los Angeles, Calif. ...	0	0	0	0	0		
Oakland, Calif. ....	0	0	2	.3	28	Indefinite	Drinking, arrest for crime.
San Jose, Calif. ....	0	0	0	0	0		
San Diego County ..	0	0	0	0	0		
Denver, Colo. ....	0	0	0	0			
Wichita, Kans. ....	0	0	0	0	0		
Baltimore, Md. ....	0	0	0	0	0		
Kansas City, Mo. ....	1	1	1	.1	20	1	Warrant for arrest, misdemeanor arrest, firearms violation, pose as police.
St. Louis, Mo. ....	16	11	15	0.6	2	½	Firearms violation, improper conduct, commit crime.
St. Louis County....	NA	NA	NA				
Newark, N.J. ....							
Cleveland, Ohio ....	0	0	0	0			
Okla. City, Okla. ....							
Salem, Oreg. ....	0	0	0	0	0		
Pittsburgh, Pa. ....	NA	NA	NA				
Dallas, Tex. ....	0	0	0	0	0		

Table 16 (Cont.)

	Number suspended			1970 sus- pensions as per- cent of total licen- sees	1970 sus- pensions as per- cent of total com- plaints	Length of suspensions (month)	Reason for suspensions
	1968	1969	1970				
Richmond, Va. ....	NA	NA	0	0	0		
Seattle, Wash. ....	0	0	0	0	0		
King County, Wash. ....							
Washington, D.C. ....							
City A. ....	0	0	0	0	0		
City B. ....	NA	NA	NA	0.1	85	3 to 4	Arrested for crime, impersonate police.
City C. ....	11	12	11				
Total reported. ....	28	24	29				
Average reported. ....	1.9	1.6	1.7	.06	9	1.7	

Table 17  
REGULATORY AGENCY SURVEY: LICENSE REVOCATIONS

Area	Number revoked			1970 rev- ocations as per- cent of total licensees	1970 rev- ocations as per- cent of total complaints	Reasons for revocations
	1968	1969	1970			
States:						
California. ....	4	3	4	0.1	4.4	Breaking and entering, false report, extortion, felony conviction, falsify application. Wiretap, wage law violation.
Connecticut. ....	1	1	0	0	0	
Delaware. ....	0	0	0	0	0	
Florida. ....	NA	NA	1	.1	1.6	Violation of regulations. Criminal record, forfeit bond, violate regula- tions.
Indiana. ....	NA	NA	NA			Interfere with police.
Iowa. ....	2	0	0	0	0	
Kentucky. ....	NA	NA	0	0	0	
Maryland. ....	1	2	1	.6	7.7	Violate rules, unethical conduct, perjury, ex- cess force. Criminal indictment, IRS violation.
Michigan. ....	0	2	7	1.9	10.8	
Minnesota. ....	0	0	0	0	0	Fail to obtain bond, unlicensed activity.
Nebraska. ....	1	0	0	0	0	
Nevada. ....	0	0	0	0	0	
New Jersey. ....	0	0	0	0	0	
New York. ....	0	0	2	.2	1.7	Violate regulations, false application, fraud, demonstrated incompetence or unworthi- ness.
North Dakota. ....	0	0	0	0		
Ohio (Peace Officer Training Council) ..						
Texas. ....	NA	NA	NA			
West Virginia. ....						
Total reported. ....	9	8	15			
Average reported. ....	0.8	0.7	0.1	0.2	2.2	

Table 17 (Cont.)

Area	Number revoked			1970 rev- ocations as per- cent of total licensees	1970 rev- ocations as per- cent of total complaints	Reasons for revocations
	1968	1969	1970			
Cities and counties:						
Birmingham, Ala. ....	NA	NA	0	0		
Los Angeles, Calif. ....	6	26	17	1.0	22	Arrest, carry concealed weapon, firing shots, improper uniform, interfere with police.
Oakland, Calif. ....	0	0	0	0	0	
San Jose, Calif. ....	0	0	0	0	0	
San Diego County. ....	0	0	0	0	0	
Denver, Colo. ....	0	0	0	0		
Wichita, Kans. ....	2	2	3	.6	37	Drunk, fail to provide services.
Baltimore, Md. ....	0	1	1	.1	100	Excess force, larceny.
Kansas City, Mo. ....	1	1	7	.5	140	Felony arrest, violate gun regulation, theft arrest.
St. Louis, Mo. ....	NA	61	67	2.6	10	Firearms violation, commit crime, improper conduct.
St. Louis County. ....	NA	NA	NA			
Newark, N.J. ....						
Cleveland, Ohio. ....	NA	NA	4	.4		Drunk, conduct unbecoming, disorderly con- duct, excess force.
Okla. City, Okla. ....		23				
Salem, Oreg. ....	0	0	2	6.9	100	Criminal activity, repeated rule violations, bond revoked.
Pittsburgh, Pa. ....	NA	NA	NA			
Dallas, Tex. ....	NA	NA	NA			Violate law, falsified application.
Richmond, Va. ....	NA	NA	0	0	0	
Seattle, Wash. ....	0	0	0	0	0	
King County, Wash. ....						
Washington, D.C. ....						
City A. ....	0	0	0	0	0	Impersonate police, assault.
City B. ....	NA	NA	NA			
City C. ....	NA	NA	NA			Arrest.
Total reported. ....	9	113	101			
Average reported. ....	0.8	8.7	6.7	0.9	37	

Table 18  
REGULATORY AGENCY SURVEY: FINES IMPOSED

Area	Number of fines imposed			1970 fines as percent of total licenses	1970 fines as percent of total complaints	Average fine (\$)	Maximum fine (\$)	Reasons for fines
	1968	1969	1970					
<b>States:</b>								
California	0	0	0	0	0			
Connecticut	NA	1	1	1.0	14		100	Theft, wage law violation.
Delaware	0	0	0	0	0			
Florida	NA	NA	2	0.3	3		500	Violation of regulations.
Indiana	NA	NA	NA					
Iowa	0	1	0	0			100	Unlicensed.
Kentucky	NA	NA	NA					
Maryland	2	0	2	1.3	15	250	250	Unlicensed.
Michigan	0	1	5	1.4	8	50	179	Unlicensed, improper uniform, not fingerprinting employees.
Minnesota	0	0	0	0				
Nebraska	0	0	0	0	0			
Nevada	NA	NA	NA					
New Jersey	NA	NA	NA					
New York	4	5	4	0.4	3	250	500	Violate regulations, false application, fraud, demonstrated incompetence.
North Dakota	NA	NA	NA					
Ohio (Peace Officer Training Council)								
Texas	NA	NA	NA					
West Virginia								
Total reported	6	8	14					
Average number reported	.8	.9	1.4	.4	5.4	167	271	
<b>Cities and counties:</b>								
Birmingham, Ala.	NA	NA	1	4.7		170	170	Carry concealed weapon.
Los Angeles, Calif.	NA	NA	NA					
Oakland, Calif.	0	0	0	0	0			
San Jose, Calif.	NA	NA	NA					
San Diego County	NA	NA	NA					
Denver, Colo.	0	0	0	0				
Wichita, Kans.	2	0	0	0	0	25	100	Drunk driving, draw deadly weapon, unlicensed.
Baltimore, Md.	0	0	0	0	0			
Kansas City, Mo.	NA	NA	NA					
St. Louis, Mo.	0	0	0	0	0			
St. Louis County	0	0	0	0				
Newark, N.J.								
Cleveland, Ohio	0	0	0	0				
Okla. City, Okla.								
Salem, Oreg.	NA	NA	NA					
Pittsburgh, Pa.	NA	NA	NA					
Dallas, Tex.	NA	NA	5	0.2	12	50	200	Unlicensed, improper uniform, impersonate police, carry weapon off duty.

Table 18 (Cont.)

Area	Number of fines imposed			1970 fines as percent of total licenses	1970 fines as percent of total complaints	Average fine (\$)	Maximum fine (\$)	Reasons for fines
	1968	1969	1970					
Richmond, Va.	NA	NA	NA					
Seattle, Wash.	0	0	0	0				
King County, Wash.	0	0	0	0	0			
Washington, D.C.								
City A	0	0	0	0	0		25	25
City B	NA	NA	NA					Drunk, impersonate police.
City C	NA	NA	NA					
Total reported	2	0	6					
Average number reported	.2	0	.5	.4	1.7	67	124	

Table 19  
REGULATORY AGENCY SURVEY: IMPRISONMENT

Area	Number of security personnel sentenced			Number sentenced as percent of licenses	Number sentenced as percent of complaints	Length of imprisonment	Reason for sentencing
	1968	1969	1970				
<b>States:</b>							
California	NA	NA	NA				
Connecticut	0	0	0	0	0		
Delaware	NA	NA	NA				
Florida	NA	NA	NA				
Indiana	NA	NA	NA				Continue to operate unlicensed business.
Iowa	0	0	0	0	0		
Kentucky	NA	NA	NA				
Maryland	NA	NA	NA				
Michigan	0	0	0	0	0		Unlicensed, assault, impersonate police.
Minnesota	0	0	0	0	0		
Nebraska	NA	NA	NA				
Nevada	NA	NA	NA				
New Jersey	NA	NA	NA				
New York	NA	NA	NA				Illegally possess gun, possess stolen property, assault, threatening, drugs.
North Dakota	0	0	0	0	0		
Ohio (Peace Officer Training Council)							
Texas	NA	NA	NA				
West Virginia							
Total reported	0	0	0				
Average number reported	0	0	0	0	0		

Table 19 (Cont.)

Area	Number of security personnel sentenced			Number sentenced as percent of licensees	Number sentenced as percent of complaints	Length of imprisonment	Reason for sentencing
	1968	1969	1970				
<b>Cities and counties:</b>							
Birmingham, Ala. ....	NA	NA	0	0			
Los Angeles, Calif. ....	NA	NA	NA				
Oakland, Calif. ....	0	0	0	0	0		
San Jose, Calif. ....	NA	NA	NA				
San Diego County .....							
Denver, Colo. ....	0	0	0	0			
Wichita, Kans. ....	0	0	0	0	0		
Baltimore, Md. ....	0	0	0	0	0		
Kansas City, Mo. ....	NA	NA	NA				
St. Louis, Mo. ....	NA	NA	3	.1	.4	6 to 12 months	Violate gun law, work on suspended license.
St. Louis County .....	0	0	0	0			
Newark, N.J. ....							
Cleveland, Ohio .....	0	0	0	0			
Okla. City, Okla. ....							
Salem, Oreg. ....	0	0	1	3.4	50		
Pittsburgh, Pa. ....	NA	NA	NA				
Dallas, Tex. ....	NA	NA	1	.3	2.3	2 yr probation	
Richmond, Va. ....	NA	NA	0	0	0		
Seattle, Wash. ....	0	0	0	0			
King County, Wash. ....	0	0	0	0	0		
Washington, D.C. ....							
City A. ....	0	0	0	0	0		
City B. ....	NA	NA	NA				
City C. ....	NA	NA	NA				
Total reported. ....	0	0	5				
Average number reported. ....	0	0	0.35	0.27	5.9	7 months	

tory agency sometimes meets with the licensee agency managers as a group to discuss problems.

**TOTAL NUMBER OF MAJOR SANCTIONS**

Table 20 summarizes the total number of suspensions, revocations, fines, and sentences imposed on licensees in 1970 for each reporting regulatory agency. We caution that only 13 of the 42 responding regulatory agencies had data available on each of these 4 major types of sanctions. Thus, the actual number of such sanctions imposed may be considerably higher than the number reported here. We also note that when sanctions are compared to complaints, the re-

sults may be misleading, since some regulatory agencies keep records only of complaints that result in major sanctions being imposed.

Fourteen state regulatory agencies reported a total of 45 major sanctions against licensees in 1970. The 1970 state averages are 3.2 sanctions per state regulatory agency, 0.7 sanctions per 100 state licensees, and 12.2 sanctions per 100 reported complaints. Michigan has the "toughest" agency, with 4.7 major sanctions per 100 licensees, and 26.1 major sanctions per 100 complaints. We would not conclude from this that the private security business in Michigan is more problem-prone than it is in other states, but rather that the Michigan agency is more vigilant than most others.

Nineteen localities reported a total of 141 major sanctions against licensees in 1970. The 1970 averages are 7.4 sanctions per local regulatory agency, 0.6 sanc-

tions per 100 local licensees, and 16.7 sanctions per 100 reported complaints. St. Louis, Missouri, has one of the strongest local regulatory agencies.

Table 20  
REGULATORY AGENCY SURVEY: NUMBER OF MAJOR SANCTIONS TAKEN AGAINST LICENSEES (1970)

Jurisdiction	Total <sup>a</sup> known suspensions, revocations, fines and imprisonments	Total <sup>a</sup> reported sanctions as percent of licensees	Total <sup>a</sup> reported sanctions as percent of complaints	Jurisdiction	Total <sup>a</sup> known suspensions, revocations, fines and imprisonments	Total <sup>a</sup> reported sanctions as percent of licensees	Total <sup>a</sup> reported sanctions as percent of complaints
<b>States:</b>				<b>Cities and counties—Cont.</b>			
California .....	<sup>a</sup> 7	0.3	7.8	San Jose, Calif. ....	<sup>a</sup> 0	.0	
Connecticut .....	1	1.0	14.2	San Diego County .....	<sup>a</sup> 0	.0	
Delaware .....	<sup>a</sup> 0	.0		Denver, Colo. ....	0	.0	
Florida .....	<sup>a</sup> 3	.4	4.7	Wichita, Kans. ....	3	.6	37.5
Indiana .....	NA			Baltimore, Md. ....	1	.1	100.0
Iowa .....	0	.0		Kansas City, Mo. ....	<sup>a</sup> 8	.5	100.0
Kentucky .....	<sup>a</sup> 0	.0	.0	St. Louis, Mo. ....	85	3.3	12.4
Maryland .....	<sup>a</sup> 5	3.2	38.5	St. Louis County .....	<sup>a</sup> 0	.0	
Michigan .....	17	4.7	26.1	Newark, N.J. ....			
Minnesota .....	0	.0		Cleveland, Ohio .....	4	.4	
Nebraska .....	<sup>a</sup> 0	.0	.0	Okla. City, Okla. ....			
Nevada .....	<sup>a</sup> 1	1.8	50.0	Salem, Oreg. ....	<sup>a</sup> 3	10.3	100.0
New Jersey .....	<sup>a</sup> 1	.3		Pittsburgh, Pa. ....	NA		
New York .....	<sup>a</sup> 10	1.0	8.5	Dallas, Tex. ....	<sup>a</sup> 6	.2	14.0
North Dakota .....	<sup>a</sup> 0	.0		Richmond, Va. ....	<sup>a</sup> 0	.0	.0
Ohio (Peace Officer Training Council) .....				Seattle, Wash. ....	0	.0	
Texas .....	NA			King County, Wash. ....	<sup>a</sup> 0	.0	.0
West Virginia .....				Washington, D.C. ....			
Total Reported. ....	45			City A. ....	0	.0	.0
Average Reported. ....	3.2	.9	16.6	City B. ....	NA		
				City C. ....	<sup>a</sup> 11	.1	84.6
				Total Reported. ....	141		
				Average Reported. ....	7.4	1.1	41.6
Cities and counties:							
Birmingham, Ala. ....	1	4.8					
Los Angeles, Calif. ....	<sup>a</sup> 17	1.0	22.0				
Oakland, Calif. ....	2	.3	28.5				

<sup>a</sup> Partial total, since the number of impositions of some types of sanctions was reported to be unavailable.

## V. REGULATORY AGENCY VIEWS ON FUTURE REGULATION

The recommendations of the various regulatory agencies were expressed in response to our survey questionnaire which appears in Appendix C.\* Neither the special expertise and experience of the persons completing the questionnaire nor the amount of thought that preceded the recommendations is known to us. However, these recommendations to represent the opinions and accumulated wisdom of a very substantial cross-section of the private security regulatory agencies in the United States. As such, they are of significant value and should be given considerable weight in any decisions regarding regulation of the industry.

A total of 16 state and 23 local regulatory agencies responded to our survey with recommendations for various types of private security regulation. Those recommendations are summarized in this chapter.

### LICENSING AND REGISTRATION

Each regulatory agency surveyed was given a list of various types of private security personnel and businesses and was asked to indicate which types they felt should be licensed. Licensing was explained as "requiring some form of approval by the regulatory agency" before the business or employee could engage in private security work. The recommendations are presented in Table 21. The great majority of the responding agencies recommended that all types of contract security agencies, and all armed personnel, be licensed. A smaller majority indicated that all types of contract personnel, polygraph examiners, and special police should be licensed. A significant minority recommended that all types of in-house security forces and personnel be licensed. The percentages of the responding regulatory agencies that recommended licensing of various private security businesses and personnel are given below:

Contract investigative agencies.....	85
Contract guard agencies.....	90
Contract patrol agencies.....	87

\*The survey is further described at the beginning of Chapter IV.

Contract alarm agencies.....	61
Armored-transport agencies.....	69
Contract investigative employees.....	67
Contract guard employees.....	72
Contract patrol employees.....	69
Contract alarm employees.....	56
Armored-transport employees.....	64
In-house investigative forces.....	33
In-house guard forces.....	41
In-house police forces.....	41
In-house investigative employees.....	28
In-house guard employees.....	38
In-house police employees.....	41
Any armed personnel.....	72
Polygraph examiners.....	54
Insurance investigators.....	31
Repossessors.....	43
Process servers.....	23
Special police.....	59

Four regulatory agencies indicated that every category should be licensed, while two agencies declined to answer the question.

After the initial survey questionnaire had been sent, we noted that credit investigators had been inadvertently left off the list. Five of 6 state regulatory agencies responding to our queries felt that credit investigation agencies should be licensed, while 3 of the 6 states felt the credit investigative employees should be licensed.

Some of the regulatory agencies indicated reasons for and against licensing of various types of private security businesses and personnel. Those comments are presented in Appendix E.

### LICENSE PERIOD AND FEE

All regulatory agencies recommended a licensing period between renewals of either 1 or 2 years. Recommended fees ranged from \$10 to \$500 for private security businesses, and from \$5 to \$50 for private security employees. The average state license fee recommendations were \$179 for businesses and \$14 for employees. Average local fee suggestions were \$57 and \$19 for businesses and employees, respectively. Details of these recommendations are presented in Table 22.

Table 21  
LICENSING RECOMMENDATIONS

	Contract security agencies						Contract security employees						In-house security forces			In-house security employees									
	Guard	Investigation	Patrol	Police	Alarm	Armored transport	Guard	Investigation	Patrol	Police	Alarm	Armored transport	Polygraph examiner	Any armed personnel	Guard	Investigation	Police	Guard	Investigation	Police	Insurance investigator	Repossessor	Process server	Special police	
States:																									
California.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Connecticut.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Delaware.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Florida.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Indiana.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Iowa.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Kentucky.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Maryland.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Michigan.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Minnesota.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Nebraska.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Nevada.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
New Jersey.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
North Dakota.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Ohio (Peace Officer Training Council).....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Texas.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Total Reported.....	15	15	15	14	9	10	10	9	9	8	7	8	11	9	5	3	6	3	2	6	4	9	4	7	
Cities and counties:																									
Birmingham, Ala.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Los Angeles, Calif.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Oakland, Calif.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
San Jose, Calif.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
San Diego County.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Denver, Colo.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Wichita, Kans.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Baltimore, Md.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Kansas City, Mo.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
St. Louis, Mo.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
St. Louis County.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Newark, N.J.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Cleveland, Ohio.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Okla. City, Okla.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Salem, Oreg.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Pittsburgh, Pa.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Dallas, Tex.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Richmond, Va.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
King County, Wash.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Washington, D.C.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
City A.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
City B.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
City C.....	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Total Reported.....	20	18	19	15	15	17	18	17	18	13	15	17	10	19	11	10	10	12	9	11	8	8	5	16	

Several of the regulatory agencies recommended that initial license fees be somewhat higher than renewal fees, and that a deposit be required on badges issued by the regulatory agency. (At present, St. Louis charges a \$25 training fee.) It was also frequently recommended that fees be set to cover costs of processing and checking the background of the applicant. The Newark, New Jersey, agency felt that fees should cover all costs of regulation, not just the applicant processing costs. The City C agency would set fees to cover costs, but within the means of low-income applicants. The Oakland, California, agency indicated the processing cost per applicant is approximately \$46.

### AGE, EDUCATION, AND RESIDENCY

Minimum personnel age requirements were recommended by 32 of the 39 regulatory agencies. The minimum age was never set higher than 21 years and in five cases was set as low as 18 years. The Washington, D.C., agency recommended 18 years of age for guards, but 21 years for investigators. The Maryland and New Jersey agencies specified 21 years for armed guards, but 18 years for those that are not armed. The Dallas agency indicated that persons under 21 are usually not mature enough to accept the responsibility of carrying a gun unless extensively trained. The Connecticut agency suggested that personnel between 18 and 21 be allowed to work as trainees.

Only 7 regulatory agencies recommended setting maximum age limits. The maximum ages recommended range from 60 to 65 years. The Kansas City agency suggested that no maximum age should be set, since many companies hire pensioners. St. Louis County agency officials felt the maximum age limit should depend on the type of job and the physical capability of the employee. The City A agency asserted that most present guards are too old to be proficient in the use of a gun.

Mandatory minimum educational requirements were recommended by 21 and opposed by 13 regulatory agencies. Literacy or an eighth-grade education was recommended by 2 agencies for guards and by 5 agencies for all personnel. High-school education was recommended by 8 agencies for all personnel, by an additional 5 agencies for investigators, by an additional 1 agency for patrolmen, and by 2 agencies for all armed personnel. Two agencies recommended polygraph-school graduation for lie-detection examiners. The City C agency suggested that educational standards be set for any personnel working with the public, and the Newark agency recommended some

college education for all supervisors. City A indicated that educational standards are necessary because, with the low rate of pay for guards, agencies are not concerned with education. The North Dakota agency responded that, ideally, private investigators should have a college education with a minimum of one year of law-school training. However, the Salem, Oregon, agency pointed out that since patrolmen's wages are very low and those persons accepting such jobs are quite old for the work, it is doubtful that qualified persons could be obtained if educational standards were above the high-school level. The Dallas agency reasoned that literacy is necessary so that personnel can understand the laws governing them.

Residency or citizenship requirements were recommended by 26 regulatory agencies and opposed by only 8 agencies. The Florida agency felt such requirements should be placed on security managers but not on employees. Five agencies indicated that citizenship requirements would be desirable, but not residency requirements. Six months, 1 year, or 3 years were the periods of residency specifically recommended. The St. Louis County, Missouri, agency felt that residency restrictions are beneficial because they help maintain jurisdictional and regional control over licensees. The North Dakota respondent indicated that it is often difficult to acquire jurisdiction over a nonresident private investigator who has committed a misdemeanor which is in violation of the licensing laws. The Dallas, Texas, agency reasoned that licensees or managers should be local residents for at least 3 years so that their criminal record and reputation would be easily ascertainable.

Detailed responses on age, education, citizenship, and residency requirements are given in Table 23.

### EXPERIENCE

Thirteen state regulatory agencies favored, and 2 opposed, setting minimum requirements of prior relevant work experience for licensees. In contrast, only 7 local regulatory agencies favored such requirements, while 13 opposed them. The suggested minimum length of experience for investigative agency operators ranged from 2 to 5 years, while the range for guard agency managers was lower—1 to 4 years. No regulatory agency recommended that security employees be required to have prior security experience. The St. Louis County agency indicated that prior experience need not be required of employees because they would

Table 22  
REGULATORY AGENCY SURVEY: LICENSE-PERIOD AND FEE RECOMMENDATIONS

	License period (years)	Agency license fee (dollars)	Employee registration fee (dollars)
<b>States:</b>			
California	2	50	
Connecticut	1	200 to 400	
Delaware	2	200 to 300	
Florida	1	35 to 100	
Indiana	2	150	10
Iowa	1	50 to 100	15
Kentucky	1	100	
Maryland	2	500	25
Michigan	2	100 to 200	
Minnesota	2	250	
Nebraska	2	10 to 25	
Nevada	1	75	
New Jersey	2	200 to 300	
North Dakota	1		
Ohio (Peace Officer Training Council)			
Texas	1	100 to 150	5
Average Reported	1.5	179	14
<b>Cities and counties:</b>			
Birmingham, Ala.	2	10	10
Los Angeles, Calif.	1		26.50
Oakland, Calif.	1	50	10
San Jose, Calif.	1		
San Diego County	1	25	5
Denver, Colo.	1	25 to 100	10
Wichita, Kans.	1	100 to 250	25
Baltimore, Md.	1		10 to 25
Kansas City, Mo.	1		10
St. Louis, Mo.	1		10 to 20
St. Louis County	1		50
Newark, N.J.	2		
Cleveland, Ohio	1		10
Okla. City, Okla.	1	60	
Salem, Oreg.	1	50 to 100	10 to 50
Pittsburgh, Pa.	2		
Dallas, Tex.	1	50	10
Richmond, Va.	1	35	
King County, Wash.	1	35 to 100	5 to 10
Washington, D.C.	1	57	
City A	1	10	40
City B	1		5 to 50
City C	2		
Average Reported	1.1	57	19

**Table 23**  
**REGULATORY AGENCY SURVEY: AGE, EDUCATION, AND RESIDENCY RECOMMENDATIONS**

Area	Minimum age (type personnel)	Maximum age (type personnel)	Minimum education (type personnel)	Residency or citizenship requirements
<b>States:</b>				
California	18 or 21, all	None	None	No.
Connecticut	21, all		High school, all	Yes.
Delaware	21, all			Yes.
Florida	None	None	None	Yes, manager. No, employee. No.
Indiana	21, all			
Iowa			High school, all	
Kentucky	21, all		High school, all; Polygraph school, poly. examiner.	Yes, citizenship. No, residency.
Maryland	21, investigator, armed guard. 18, unarmed guard.	None	None	Yes, citizenship.
Michigan	25, employers. 21, employees <sup>b</sup>		High school, employer. 8th grade, employee.	Yes, both.
Minnesota	21, all		None	Yes.
Nebraska	21, all		High school, all	Yes.
Nevada	None	None	None	Yes, 6 months residency.
New Jersey	21, armed. 18, unarmed.		None	Yes, citizenship.
North Dakota			High school, investigator	Yes.
Ohio (Peace Officer Training Council)	21, all. 18, all		High school, all. High school, investigator; Literacy, guard	No.
<b>Cities and counties:</b>				
Birmingham, Ala.	Yes		Literacy, all	Yes.
Los Angeles, Calif.	None	None	None	Yes.
Oakland, Calif.	None	None	None	No, residency. Yes, citizenship.
San Jose, Calif.	21, patrolmen		High school, patrolmen	Yes.
San Diego Co., Calif.	21, patrolmen		None	Yes.
Denver, Colo.	21, guard		None	Yes.
Wichita, Kans.	21, all		High school, all	Yes.
Baltimore, Md.	21, all		None	
Kansas City, Mo.	21, all		High school, investigator	No, residency. Yes, citizenship.
St. Louis, Mo.	21, all	None	High school, investigator	Yes.
St. Louis Co., Mo.	21, all	Variable	Yes, armed	Yes.
Newark, N.J.	21, armed	65, armed	Literate, all; high school, armed; some college, super.; poly. school, poly examiner.	No.
Cleveland, Ohio	21, police	65, police		No.
Oklahoma City, Okla.	21, all	60, all	8th grade, all	
Salem, Oreg.	21, all		8th grade, all	Yes.
Pittsburgh, Pa.				
Dallas, Tex.	21, all	65, all	Literate, all	Yes, 3 years, managers.
Richmond, Va.	21, all		None	No.
King Co., Wash.	18, all		None	No.
Washington, D.C.	21, investigator. 18, guard			No.

**Table 23 (Cont.)**

Area	Minimum age (type personnel)	Maximum age (type personnel)	Minimum education (type personnel)	Residency or citizenship requirements
City A	21, all	65, all	High school, all	Yes, 1 year.
City B	21, <sup>a</sup> all	60, all	High school, all	Yes, 6 months.
City C	18 or 21, all		Yes, all who work with public.	No, residency. Yes, citizenship.

<sup>a</sup> 18, if mature and pass psychological test.

<sup>b</sup> 18, with special permission from regulatory agency.

be trained prior to licensing in that county. Table 24 gives the detailed survey responses.

### BACKGROUND CHECK

Thirty-three regulatory agencies recommended federal, state, and local criminal records checks for all licensees. Another 4 agencies recommended that 2 of the 3 levels of records checks be conducted. Nearly every agency would deny a license to a convicted felon, although 3 agencies would ignore convictions occurring more than 5, 10, or 20 years ago. Fifteen agencies would deny a license on the basis of a conviction for a crime involving moral turpitude, and for certain misdemeanor convictions. Five agencies said that any arrest record might result in a denial. The St. Louis County, Missouri, agency cautions that criminal records checks should be conducted in the applicants' former cities of residence, even if they are out of state; the agency also suggests that acceptance or rejection should not be based on the simple presence or absence of arrests or convictions, but rather should be determined by the total profile of the applicant. The Kentucky agency feels that renewals should be granted only after updating criminal records checks. In New Jersey, the fingerprint check has revealed that more than 20 percent of the employees of private detective agencies have arrest records.

Of the 39 responding regulatory agencies, 27 would check an applicant's personal reference, 26 would check his neighbors, and 33 would check his past employers. Some agencies recommended checks of credit, education, military record, or church activities, or other state licensing agency checks. In their survey response, the St. Louis police pointed out that certain otherwise undetectable traits may be revealed by a background investigation of neighbors, references, and past employment. On the other hand, the Kansas City, Missouri, agency indicated that although extensive

background checks are desirable, they are unrealistically demanding in terms of the manpower they would require.

Additional details on the survey responses concerning background checks are given in Table 25.

### BONDING AND INSURANCE

Every responding state regulatory agency recommended that bonding be mandatory. They recommended bond levels of \$2,000 to \$300,000 for all licensees. Fifteen localities favored mandatory bonding, while 7 opposed it. The average state and local recommended bond levels were \$28,000 and \$15,000, respectively.

Only 3 regulatory agencies recommended mandatory insurance, at levels ranging from \$50,000 to \$500,000. Refer to Table 26 for further details.

The New Jersey agency cautioned that bonds are typically conditioned for "faithful and honest conduct" of the private detective business and indicated that successful legal action against these bonds is infrequent because of the vagueness of the bonding conditions. The Oakland agency raised the legal question of the possible liability of the licensing governmental body. They felt it necessary to indemnify the governmental body against actions of the contract agencies. The Dallas agency indicated that without being bonded or insured, only a few of the major private security companies would be able to defend the rights of their employees or customers.

### LICENSEE TESTING

Two-thirds of the regulatory agencies surveyed favored mandatory written examinations for new licensees. All but 2 agencies opposed written tests for license renewals. The test topics suggested are presented in Table 27. Generally, it was recommended

Table 24  
REGULATORY AGENCY SURVEY: MINIMUM EXPERIENCE RECOMMENDATIONS  
(years)

Area	Investigation agency manager	Guard or patrol agency manager	Repos- sessor	Process server	Poly- graph examiner	Super- visors	All licensees	All agency managers
States:								
California . . . . .	2	1						5
Connecticut . . . . .								5
Delaware . . . . .								Yes
Florida . . . . .	3	3						* Yes
Indiana . . . . .								
Iowa . . . . .								
Kentucky . . . . .								
Maryland . . . . .	5							
Michigan . . . . .	3	4						
Minnesota . . . . .							3	
Nebraska . . . . .							None	
Nevada . . . . .	5	3	3	2	2			
New Jersey . . . . .		3						
North Dakota . . . . .	2							
Ohio (Peace Officer Training Council) . . . . .							None	
Texas . . . . .	3	3						
Average . . . . .	3.3	2.8	3	2	2			
Cities and counties:								
Birmingham, Ala. . . . .							None	
Los Angeles, Calif. . . . .							None	
Oakland, Calif. . . . .							None	
San Jose, Calif. . . . .							None	
San Diego Co., Calif. . . . .							None	
Denver, Colo. . . . .							None	
Wichita, Kans. . . . .							None	
Baltimore, Md. . . . .							None	
Kansas City, Mo. . . . .	2							2
St. Louis, Mo. . . . .							None	
St. Louis Co., Mo. . . . .							None	
Newark, N.J. . . . .	2					2		
Cleveland, Ohio . . . . .		1					None	
Oklahoma City, Okla. . . . .							None	
Salem, Oreg. . . . .							Yes	
Pittsburgh, Pa. . . . .								
Dallas, Tex. . . . .	3	2						
Richmond, Va. . . . .							None	
King Co., Wash. . . . .							None	
Washington, D.C. . . . .								
City A . . . . .							None	
City B . . . . .							3	
City C . . . . .							None	
Average . . . . .	2.3	1.5				2		2

\* Formal law enforcement school education.

Table 25  
REGULATORY AGENCY SURVEY: BACKGROUND-CHECK RECOMMENDATIONS

	Criminal records check			Grounds for license denial based on criminal record	Reference Check	Neighbor Check	Past Employer Check	Other checks
	Federal	State	Local					
States:								
California . . . . .	✓	✓	✓	Felony or moral turpitude crime conviction.			✓	
Connecticut . . . . .	✓	✓	✓	Felony or moral turpitude crime conviction.	✓	✓	✓	Credit, education, military.
Delaware . . . . .	✓	✓	✓	Felony or assault conviction . . . . .	✓			
Florida . . . . .	✓	✓	✓	Felony, morals, theft or assault conviction.	✓		✓	
Indiana . . . . .	✓	✓	✓					
Iowa . . . . .	✓	✓	✓	Felony conviction . . . . .	✓	✓	✓	
Kentucky . . . . .	✓	✓	✓	Felony arrests or conviction . . . . .	✓	✓	✓	
Maryland . . . . .	✓	✓	✓	Felony or serious misdemeanor conviction.	✓	✓	✓	Credit, education, military.
Michigan . . . . .	✓	✓	✓	Felony, morals, or specified misdemeanor conviction.	✓	✓	✓	Extensive.
Minnesota . . . . .	✓	✓	✓	Felony conviction . . . . .	✓	✓	✓	
Nebraska . . . . .	✓	✓	✓					
Nevada . . . . .	✓	✓	✓	Felony conviction . . . . .	✓	✓	✓	Credit, church.
New Jersey . . . . .	✓	✓	✓	Felony, morals, or high misdemeanor conviction.	✓	✓	✓	
North Dakota . . . . .	✓	✓	✓	Felony or moral turpitude crime conviction.				Credit, other state license bureaus.
Ohio (Peace Officer Training Council) . . . . .	✓	✓	✓	Felony or specified misdemeanor conviction.		✓	✓	
Texas . . . . .	✓	✓	✓	Habitual offender . . . . .	✓	✓	✓	
Cities and counties:								
Birmingham, Ala. . . . .								
Los Angeles, Calif. . . . .	✓	✓	✓	Felony, morals, drunk, or dishonesty crime conviction.	✓	✓	✓	
Oakland, Calif. . . . .	✓	✓	✓	Felony or moral turpitude crime conviction.	✓		✓	
San Jose, Calif. . . . .	✓	✓	✓	Felony conviction . . . . .	✓		✓	
San Diego County . . . . .	✓	✓	✓	Felony, sex, or narcotics.				
Denver, Colo. . . . .	✓	✓	✓	Felony conviction in last 10 years . . . . .				
Wichita, Kans. . . . .	✓	✓	✓	Felony and certain misdemeanor convictions.	✓	✓	✓	
Baltimore, Md. . . . .	✓	✓	✓					
Kansas City, Mo. . . . .	✓	✓	✓	Felony conviction or numerous arrests of any type.	✓	✓	✓	
St. Louis, Mo. . . . .	✓	✓	✓	Violent crime or felony convictions, morals arrest.	✓	✓	✓	
St. Louis County . . . . .	✓	✓	✓					
Newark, N.J. . . . .	✓	✓	✓	Adult convictions, or arrests indicating pattern of criminality.	✓	✓	✓	
Cleveland, Ohio . . . . .	✓	✓	✓	Felony conviction in last 20 years . . . . .		✓	✓	
Okla. City, Okla. . . . .	✓	✓	✓	Felony or morals conviction . . . . .	✓	✓	✓	
Salem, Oreg. . . . .	✓	✓	✓					
Pittsburgh, Pa. . . . .	✓	✓	✓	Felony conviction . . . . .	✓	✓	✓	

Table 25 (Cont.)

	Criminal records check			Grounds for license denial based on criminal record	Reference Check	Neighbor Check	Past Employer Check	Other checks
	Federal	State	Local					
Dallas, Tex.....	✓	✓	✓	Felony, morals, or certain misdemeanor convictions.	✓	✓	✓	
Richmond, Va.....	✓	✓	✓	Felony or morals conviction.....	✓	✓	✓	
King County, Wash.....	✓	✓	✓	Felony or morals conviction in past 5 years.	✓	✓	✓	
Washington, D.C.								
City A.....	✓	✓	✓	Felony or morals conviction.....			✓	
City B.....	✓	✓	✓	Any conviction, several arrests.....	✓	✓	✓	
City C.....	✓	✓	✓	Acceptability of arrest record depends on type of employment.	✓	✓	✓	

that tests cover topics relevant to the private security occupation, with the most frequently advocated topic being the law and the legal powers of the security personnel. The Kentucky agency recommended that situation-reaction questions be included.

The Director of the California Licensing Board expressed his belief that testing was a very imprecise measure of competency. However, he felt that if testing is set at a level of difficulty that permits an acceptable number of applicants to pass, it tends to "weed out those who are totally unfit."

Nine localities, but only 2 states, favored psychological testing of employees. Two respondents indicated that psychological testing would be desirable but very expensive. Three agencies questioned whether a usable, accurate psychological test was available. The North Dakota respondent felt that such tests would have to be sufficiently accurate to indicate mental instabilities of a nature that would preclude issuance of a license.

**TRAINING AND RETRAINING**

Twenty-six responding agencies advocated mandatory training for certain types of private security personnel, while only 2 opposed it. A smaller majority, 18 agencies, favored mandatory retraining, while only 5 opposed it. Those recommending retraining typically

favored firearms retraining one to four times each year, and other types of retraining once or twice each year. The length of retraining programs recommended by survey respondents ranged from 3 to 24 hours and averaged 12 hours. The length of recommended training programs ranged from 12 to 150 hours and averaged 58 hours. The Ohio Peace Officer Training Council, which has studied the issue of training private security personnel in some detail, recommends a 120-hour program. The detailed 120-hour curriculum currently in use in Ohio is described in companion report R-870-DOJ.

Detailed recommendations concerning training and retraining are presented in Table 28. The areas in which initial training was most frequently suggested are the use of firearms, the law, and the legal authority of private security personnel. A detailed description of the amount of training and retraining time recommended by each regulatory agency for specific topics is presented in Appendix E.

**BADGES, IDENTIFICATION CARDS, AND UNIFORMS**

All but one regulatory agency recommended that private security employees be required to carry special employee identification cards. The agencies unanimously recommended that regulations be established governing allowable types of private security uni

Table 26  
REGULATORY AGENCY SURVEY: BOND AND INSURANCE RECOMMENDATIONS

	Mandatory bond (dollars)	Mandatory insurance (dollars)
States:		
California.....	5,000.....	
Connecticut.....	10,000.....	
Delaware.....	5,000.....	
Florida.....	10,000.....	
Indiana.....	5,000.....	
Iowa.....	50,000 to 100,000.....	
Kentucky.....	100,000 to 300,000.....	
Maryland.....	10,000.....	50,000.
Michigan.....	10,000.....	200,000 (P.I.); 20,000 (P.D.).
Minnesota.....	20,000.....	
Nebraska.....	10,000.....	
Nevada.....	10,000.....	
New Jersey.....	<sup>a</sup> 2,000 or 10,000.....	
North Dakota.....	10,000.....	
Texas.....	10,000.....	
Average.....	28,000.....	135,000.
Cities and counties:		
Birmingham, Ala.....	Yes.....	
Los Angeles, Calif.....	None.....	None.
Oakland, Calif.....	Yes.....	
San Jose, Calif.....		
San Diego County.....		
Denver, Colo.....		
Wichita, Kans.....	5,000.....	
Baltimore, Md.....	<sup>b</sup> 20,000 or 30,000.....	None.
Kansas City, Mo.....		
St. Louis, Mo.....	10,000.....	
St. Louis County.....		
Newark, N.J.....		
Cleveland, Ohio.....		
Oklahoma City, Okla.....	1,000.....	
Salem, Oreg.....	100,000.....	
Pittsburgh, Pa.....	1,000 to 5,000.....	
Dallas, Tex.....		
Richmond, Va.....	10,000.....	
King County, Wash.....	1,000.....	
Washington, D.C.....	2,000.....	
City A.....	5,000.....	
City B.....	10,000.....	Yes.
City C.....	5,000.....	500,000.
Average, if mandatory.....	15,000.....	500,000.

<sup>a</sup> Polygraph operators.  
<sup>b</sup> Investigators.

Table 27  
REGULATORY AGENCY SURVEY: RECOMMENDATIONS FOR TESTS

	Written test		Type of applicant tested /topics	Employee psychological testing
	Initial license	License renewal		
States:				
California	Yes	No	Guards, patrolmen /law, reports, security, patrol investigators /law, reports, interrogation.	No.
Connecticut	No	No		No.
Delaware	No	No	—/Law and law enforcement.	No.
Florida	Yes	No		
Indiana				
Iowa	Yes		All applicants /police science, law, situation reaction questions.	No.
Kentucky	Yes			No.
Maryland	No	No		No.
Michigan	No	No	Insurance investigators /investigation techniques, contract agencies /investigation, patrol, and security techniques.	Yes, all employees.
Minnesota	Yes	No		
Nebraska	Yes		All applicants /search, seizure, state law.	No.
Nevada	Yes	No	All applicants	No.
New Jersey	No	No		
North Dakota	Yes	No	Investigators /law.	Yes, all employees.
Ohio (Peace Officer Training Council)				
Texas	Yes	No	Contract agencies /law and basic rights of citizens.	No.
Cities and counties:				
Birmingham, Ala.	Yes	No	Guard, patrol /weapons use, law of arrest.	No.
Los Angeles, Calif.	Yes	No		No.
Oakland, Calif.	No	No		
San Jose, Calif.	Yes	No		No.
San Diego County				Yes, all armed employees.
Denver, Colo.	Yes	No	Guards /law and firearms.	Yes, all employees.
Wichita, Kans.	Yes	No	All applicants /law, procedures, firearms.	No.
Baltimore, Md.	No	No		No.
Kansas City, Mo.	No			Yes, if have mental disorder history.
St. Louis, Mo.				Yes, all armed employees.
St. Louis County	Yes	Yes	Armed personnel /—	Yes, all employees.
Newark, N.J.	Yes	No	Investigators and polygraph examiner:—armed employees /law, firearms range.	Yes, all employees.
Cleveland, Ohio	Yes	No		Yes, all employees.
Oklahoma City, Okla.	Yes	Yes	Patrol /police relations, gunhandling.	Yes, all employees.
Salem, Oreg.	Yes	No		
Pittsburgh, Pa.				No.
Dallas, Tex.	Yes	No	Contract agency /laws.	No.
Richmond, Va.	No	No		No.
King County, Wash.	No	No		
Washington, D.C.				Yes.
City A	No	No		Yes.
City B	Yes			
City C	Yes	No		

Table 28  
REGULATORY AGENCY SURVEY: TRAINING AND RETRAINING RECOMMENDATIONS

	Mandatory training	Mandatory retraining	Frequency of retraining	
			Firearms range (times per year)	Other retraining (times per year)
States:				
California	Yes		4	1
Connecticut	Yes	Yes	1	1
Delaware				
Florida	Yes	Yes	2	1
Indiana				
Iowa		Yes	24	2
Kentucky	Yes	No	1	
Maryland	No	No		
Michigan	Yes	Yes	4	
Minnesota	Yes	No		
Nebraska				
Nevada				
New Jersey				
North Dakota	No	No		
Ohio (Peace Officer Training Council)	Yes			
Texas	Yes	Yes	2	1
Average			5.4	1.2
Cities and counties:				
Birmingham, Ala.	Yes <sup>a</sup>			
Los Angeles, Calif.	Yes	Yes		
Oakland, Calif.	Yes	Yes	4	None
San Jose, Calif.	Yes	Yes	2	1
San Diego County	Yes	Yes	6	1
Denver, Colo.	Yes	Yes	2	12
Wichita, Kans.	Yes			
Baltimore, Md.				
Kansas City, Mo.	Yes			
St. Louis, Mo.	Yes			
St. Louis County	Yes	Yes	1	1
Newark, N.J.	Yes	Yes	1	1
Cleveland, Ohio	Yes	No		
Oklahoma City, Okla.				
Salem, Oreg.	Yes	Yes	3	3
Pittsburgh, Pa.				
Dallas, Tex.	Yes	Yes	2	1
Richmond, Va.				
King County, Wash.	Yes	Yes	2	1
Washington, D.C.				
City A	Yes	Yes	12	2
City B	Yes	Yes	4	1
City C	Yes	Yes	1	1
Average			3.3	2.4

<sup>a</sup> For some types of employees.

forms, insignia, and badges and that such regulations require uniforms and badges to be distinctly different from those of the public police.

The Oakland, California, agency suggested that identification cards should bear the holder's picture and physical description. The North Dakota agency felt that the use of any type of uniform or identification card causes the public to tend to associate private investigators or security personnel with state law-enforcement personnel; and the licensees themselves often begin to think as if they are agents of the state—a possibly dangerous situation. The St. Louis, Missouri, police noted that special and distinctive identification cards, badges, and uniforms make inspection and control easier; these devices also identify private security personnel, their authority, and more importantly, the limitations of that authority. The Dallas respondent reasoned that uniforms should be distinctly different from those of the public police so that people, other than customers, would not expect the same service from private agencies and personnel that they do from the public police.

## WEAPONS

Certain types of security and investigative personnel on certain types of assignments would be prohibited from carrying firearms by 19 regulatory agencies, but 9 agencies would impose no such prohibitions. Similar recommendations were made regarding concealed firearms. Two agencies would allow only special police to carry firearms. Others would prohibit guns for investigators, persons in nonhazardous jobs, and off-duty personnel, or in especially volatile situations, such as strikes. Three agencies would allow firearms only if personnel were adequately trained.

Sixteen agencies would prohibit certain weapons other than firearms, but the same number would not. The California Licensing Director suggested that batons or mace might be permitted in lieu of firearms in certain cases. Other specific recommendations are presented in Table 29.

## CONTROL OF PRIVATE SECURITY METHODS AND PROCEDURES

Private security and investigative personnel and agencies employ a wide variety of methods and operating procedures. Each of the following methods or procedures was recommended by at least one regulatory agency:

- No person engaged in any private business shall use any title similar to those used by public agency personnel. No private person shall represent himself or use any sign, word, or device calculated to induce a false or mistaken belief that he is acting or purporting to act on behalf of any governmental agency.
- No burglar-alarm company shall connect an automatic-dialing device directly to the public police without the approval of the public police. Alarm systems that automatically dial the public police could flood the telephone lines in the event of a widespread emergency such as an earthquake. For this reason, it is recommended that automatic-dialing alarms be either prohibited or keyed into special numbers at the public police department so that they cannot tie up the regular numbers.
- Every person maintaining a burglar-alarm device shall post a notice containing the names, addresses, and telephone numbers of persons to be notified to render repair or service during any hour of the day or night when the alarm rings.
- No burglar alarm shall be installed that makes a sound similar to that of a siren used on emergency vehicles.
- Upon notification by the public police department or any other source that a burglar alarm is ringing, the permittee shall immediately dispatch an agent to the location. In no event shall a delay in excess of 1 hour be permitted. When a silent-type alarm has been activated, the permittee shall dispatch an agent immediately to the location. In no event shall a delay in excess of 1 hour be permitted.
- Each alarm permittee shall clearly instruct his subscribers in the proper use and operation of the alarm, with particular attention to those factors that can cause false alarms. Periodic inspections shall be made by the permittee to reeducate the subscriber.
- Each alarm system shall be inspected and serviced at least once each year.
- To help control the number of false alarms, a fee shall be charged for every time the public police respond to the alarm (presently, 95 to 98 percent of all alarms are false). Fees could be based on public police costs; an average of 40 man-minutes of public police time is spent on every burglar-alarm call. Alternatively, the alarm company might charge clients voluntarily for false alarms.
- Private security officers may perform their duties only at the specific location authorized by the license or registration.
- Private security personnel shall furnish the Chief of Police with any and all reports when requested.
- Upon discharging his firearm or becoming engaged in physical combat or serious altercation, a private security officer shall telephone the headquarters of the police division in which the incident occurred as soon as possible.
- Private security officers shall not perform their duties while under the influence of any intoxicant or narcotic, nor shall they partake of such intoxicants while on duty or when in uniform and not on duty.

Table 29  
REGULATORY AGENCY SURVEY: WEAPONS RECOMMENDATIONS

	Prohibit firearms?	Prohibit concealed firearms?	Types of personnel to be prohibited from possessing firearms	Prohibit certain weapons other than firearms?	Prohibit baton?	Prohibit chemical weapons?	Prohibit black-jacks?
States:							
California.....				Yes....	No....	No....	Yes.
Connecticut.....	Yes....	Yes....		No....			
Delaware.....							
Florida.....	No....	No....		No....			
Indiana.....	No....	No....		No....			
Iowa.....		Yes....	Shopping service personnel.....	No....			
Kentucky.....	Yes....	Yes....	Anyone not possessing police powers....	No....			
Maryland.....	Yes....	Yes....	Personnel on school and juvenile related assignments.	No....			
Michigan.....	No....	No....		Yes....	No....	Yes....	Yes.
Minnesota.....	No....	No....		No....			
Nebraska.....							
Nevada.....	Yes....	Yes....	All personnel except guards and patrolmen.	Yes....			
New Jersey.....	Yes....		Anyone not guarding valuable property.	Yes....	Yes....		Yes.
North Dakota.....	Yes....	Yes....		Yes....	Yes....	Yes....	Yes.
Ohio (Peace Officer Training Council).	Yes....	Yes....	Retail store and factory security personnel.	Yes....			
Texas.....	Yes....	Yes....	All not possessing police powers.....	Yes....			
Cities and counties:							
Birmingham, Ala.....				No....			
Los Angeles, Calif.....	Yes....	Yes....	Plainclothes investigators.....	Yes....	No....	Yes....	Yes.
Oakland, Calif.....	Yes....	Yes....	All categories prohibited from concealed firearm; Dance guards.	Yes....		Yes....	
San Jose, Calif.....	Yes....	Yes....	Watchmen, Polygraph Operators.....	No....			
San Diego County.....		Yes....	Uniformed personnel.....				
Denver, Colo.....	Yes....	Yes....	Guards on innocuous jobs.....	No....			
Wichita, Kans.....	Yes....		Personnel on strike duty.....	Yes....	Yes....	No....	Yes.
Baltimore, Md.....							
Kansas City, Mo.....	No....	No....		No....			
St. Louis, Mo.....	Yes....	Yes....	Personnel off duty and off premises.....	Yes....	Yes....	Yes....	Yes.
St. Louis County.....	Yes....	Yes....	All personnel prohibited from concealed firearm; All investigative personnel.	Yes....	Yes....	Yes....	Yes.
Newark, N.J.....	No....	Yes....	Uniformed personnel.....	No....			
Cleveland, Ohio.....	No....	No....		No....			
Okla. City, Okla.....							
Salem, Oreg.....		Yes....		No....			
Pittsburgh, Pa.....							
Dallas, Tex.....	Yes....	Yes....	Investigators.....	Yes....	No....	Yes....	
Richmond, Va.....	No....			Yes....			Yes.
King County, Wash.....	No....	No....		No....			
Washington, D.C.....							
City A.....	Yes....	Yes....	Investigators.....	No....			
City B.....	Yes....	Yes....	Personnel on nonhazardous assignments.	Yes....	Yes....	No....	Yes.
City C.....	Yes....		Anyone for which it is not essential for safety.	Yes....	No....		

\* Prohibit under certain conditions.

- Private security personnel may not carry firearms capable of being concealed except when in uniform or with special authorization from the police.
- The Chief of Police may temporarily suspend the commission of any private security employee upon receipt of information that the employee has been arrested or has been accused of noncompliance with rules and regulations.
- Any employee in the licensed private detective business who willfully makes a false report with respect to any manner or thing connected with his employment shall be guilty of a misdemeanor.
- On notice from the responsible regulatory agency, a licensee shall discontinue any advertising, seal, or card which, in the opinion of the regulatory agency, may tend to mislead the public.
- Only the licensed address and business name of a private security organization may be used in any advertisement, letterhead, etc.
- No licensee shall publish, or cause to be published, any fraudulent or misleading notice or advertisement.
- No person who is or has been an employee of a licensee shall divulge to anyone other than his employer, unless directed by his employer and except as he may be required by law, any information acquired by him during such employment in respect to any of the work to which he was assigned, or any other information related to the business of his employer gained during such employment or association.
- Any advertisement by the licensee soliciting business shall contain his name and address as they appear in the record of the State Police.
- Any use of devices or activities which tend to invade privacy should be prohibited, because a person licensed by the state always carries the *apparent* authority to do whatever he is doing, since the public has a general impression of him as a state officer.
- No licensee shall offer to do business at a location which is merely the location of an answering service unless full disclosure of that fact is made in the advertisement or offer.
- No private investigator or agency may perform any services on a contingent or percentage basis. That is, the compensation to be paid for investigative services may not be partially or wholly contingent upon a percentage of the amount of money or property recovered or dependent in any way upon the results achieved.
- Active public police officers may not operate as private detectives.
- No private investigator may accept employment adverse to a client or a former client related to a matter with respect to which the investigator has obtained confidential information by reason of, or in the course of, his employment by such a client or former client.
- All stakeouts or surveillance situations shall be communicated to the local police department.
- A patrol agency shall have a competent person con-

- stantly in attendance between 6 p.m. and 4 a.m. to receive and send telephone messages.
- Private patrol services shall furnish the police department the names and addresses of all clients four times a year.
- A private investigator must have the approval of the local Chief of Police to conduct an investigation.
- Guards in armored cars and private patrol cars must learn the proper use of the radio.
- Solicitation for personal-injury investigations and for attorney referrals shall be regulated.
- Private policemen shall volunteer to the public police department all information they may have or receive related to any crime or criminal.
- Private security personnel who are armed may carry their weapons only when on duty at the premises or district guarded, or when going directly to and from such premises or districts.
- Private security officers must file a report with the licensing agency every time their firearm is discharged away from a training range.
- If a private security officer is arrested, detained, or taken into custody for questioning or suspicion of having committed a crime, a report of the incident must be forwarded to the licensing agency within 24 hours.
- The public police department shall prepare, publish, and maintain a manual of rules and regulations.
- Moonlighting by public policemen should be prohibited. The moonlighting policemen are saying in effect, "We can't protect you as public servants, but with private pay we can," a definite conflict of interest, since the employer is buying public police protection with his security dollar.
- Each person, partnership, firm, or corporation operating under the provisions of the Private Investigator's Act is required to make a complete written record of all business transactions and reports made in connection with the operation of the agency. When any detective or agency receives a verbal report from one of its agents, a summary shall be made of such verbal report and this summary, together with written reports, shall be kept on file at least 1 year.
- Polygraph examiners shall notify each subject of the voluntariness and nature of the examination. Upon request, the subject shall be told the results of the examination.
- All records of licensees should be subject to inspection by the regulatory agency.

### DEPUTIZATION

A majority, 19, of the responding regulatory agencies did not recommend giving any private security personnel full public police powers. However, agencies would allow deputization in certain circumstances. The following are representative of the comments made by the regulatory agencies concerning deputization:

- Only those who are charged with the protection of persons and/or property should be deputized.
- Private industry has a real need for full police powers. However, at this time, the system of hiring could not permit this.
- Private security personnel might be deputized in times of an extreme emergency, such as a tornado, flood, uncontrolled fire, or riot.
- All types of *trained* security officers could be issued temporary deputization permits during an emergency and *only* for the duration of the emergency.
- Private security officers should not be deputized because if more police are required, they should be hired by the city.
- Private security personnel may be deputized where they perform a police function in a public or quasi-public building.
- Licensed personnel should have full police powers only while on duty and only while on licensed premises.
- Certain agents employed at large businesses should be deputized to allow these businesses the capability of having readily available officers at no cost to the public.

### INTERACTIONS BETWEEN PUBLIC POLICE AND PRIVATE SECURITY

Several thoughtful replies were submitted in response to an open-ended question on interactions between public police and private security, proper roles for private security, and crime reporting. The most frequent recommendation (made by 12 of the responding regulatory agencies) was that it be mandatory for private security personnel to report any and all knowledge of all crimes. The following responses were also given:

- The purpose of both public and private security investigative personnel is to protect persons and property. Public police should be directed at the overall picture; in other words, all persons should be protected and all property should be protected regardless of financial standing or any other standard. Private investigative or security agencies are designed for those firms or persons that are in need of additional investigative or security measures and are able and willing to pay for such services.
- Public police should respond to calls for assistance from private investigative or security agencies with the same degree of efficiency as to calls from any other citizen.
- Mutual cooperation between public and private security officers should be based on a predetermined policy.
- Complete cooperation between public and private security officers is necessary. Watchmen should be the eyes and ears of both the employer and the police department. Their actions should be limited to detaining suspects, by arrest if necessary, until the public police arrive. All information and/or

- evidence gathering must remain the responsibility of the public police officer.
- The St. Louis Police Department prepares and maintains a manual of rules and regulations for licensed private security officers as well as a central personnel file on all private security personnel. The Police Department also conducts periodic inspections of private security officers to insure compliance with all rules and regulations.
- With proper training, a guard can be an effective tool for law enforcement. Working hand-in-hand with the public police force, more areas can be protected. Since the public police cannot be present everywhere at one time, many areas are left directly unprotected. Hiring of private security personnel would give protection to the unprotected areas and also allow the public police to spend more time patrolling high-crime areas. Some guards, as a result of their license, have the same power of arrest as a public police officer. They do not have any other powers of an officer; that is, they are not empowered to write traffic summons, make official police reports, patrol outside their assigned premises, etc. Private police working in conjunction with the permanent public police force can provide a more effective manner of fighting crime.
- Private investigative and security personnel should not be privy to records not normally made available to the public in general.
- Private security personnel should act as an extension of the public police service as it pertains to their client's interest, and at no time should they assume responsibility for or perform acts which public police are held responsible for. Public police should be called at any time when a public domain is threatened or when the private investigation indicates something outside the scope of the private responsibility.
- Private police should be required to report knowledge of any known or suspected crimes immediately. Once the report is made, further action on their part should be undertaken only with the approval of the public police.
- Both public and private officers need to know the limitation of each other's authority. The private officer must undertake only those duties which he is authorized to perform and must contact the police on all other violations that are observed. The public police should be called whenever a private officer effects an arrest or encounters difficulty that is of such a nature as to demand police action by a public agency.
- Definite policy interactions between private and public police should be established. Private security personnel should not provide services normally assigned to the public police. Procedures for crime reporting should be established whereby incidents normally coming within public police jurisdiction would be reported.
- Contract agencies must maintain 24-hour communication capability with the local police.
- Private police may be called if the situation has gotten out of hand and cannot be controlled by the

- public police. They should be under the direct supervision and control of the local public police.
- Private agencies should be called on to assist with traffic control.
- There should be a good working agreement between public and private police; for instance, during a riot, public police should not have to maintain security at a factory known to be protected by private police. Public police should be called whenever there is a violation of the law. This is difficult in cases of minor charges at the present time because of the manpower problems of various police departments.
- A second level of security officer may be envisioned—a quasipoliceman, highly trained and closely integrated with law enforcement, performing all those functions that law enforcement is prepared to delegate. Should such a category of private officers evolve, it must be the creature of law enforcement, based upon its assessment of how private security can best function for the public good.

### ADEQUACY OF CURRENT REGULATORY BUDGETS, STAFF LEVELS, AND WORKLOADS

The average private security regulatory agency has a staff of 3.5 full-time personnel, split roughly equally between clerical and investigative personnel. Two agencies reported that they had no full-time personnel, while one agency, in Florida, has 14 full-time employees (the largest staff reported). One state agency reported that the licensing statute is presently administered by one public police investigator in addition to his other normal investigative duties. This investigator reportedly devotes, at best, less than 10 percent of his time to the licensing of all private detectives in the entire state. Data on budget and staff levels for each agency are given in Table 30.

The average regulatory agency budget for the states was \$49,400 per year. Localities averaged somewhat less, spending an average of \$44,000 per year.\* California spent the most of any reporting agency, \$105,000. However, we note that some of the reported budgets were too low to include all salaries, expenses, and overhead. Also, several agencies supplement the regular staff with part-time public police investigators who are probably not included in the budget.

Data on the regulatory staff workload are presented in Table 31. The average state agency reported expending 14 man-hours on each license application and 17 man-hours on each complaint received. The aver-

\* The actual average figure of \$15,000 shown in Table 30 does not include salaries of the St. Louis agency personnel. Assuming reasonable values for these salaries brings the average spending up to \$44,000.

age figure for local regulatory agencies was 5 man-hours per complaint or license application. But time spent on individual applications varied from 0 to 32 hours. Time spent investigating complaints also varied widely among regulatory agencies, from 1 to 40 hours per complaint.

The number of existing licensees or registrants per regulatory staff member ranged from 6 in North Dakota and Salem, Oregon, to 596 in Los Angeles, California. The state average was 109 licenses per staff member, and the city average was 240. The higher city average probably reflects the higher proportion of employee registrants in relation to security agency licensees.

Half of the regulatory agencies responding to our survey indicated that they did not have sufficient personnel to perform assigned functions adequately. The agencies reporting a current staff-level inadequacy felt they needed an additional 1 to 6 employees, 1 to 4 of whom would be investigators. The average state agency noted a need for a 126 percent increase in total employees and a 92 percent increase in investigators. The average local agency indicated a need to increase the number of total employees and investigators by 77 and 96 percent, respectively (see Table 32). The additional personnel would be most often used to conduct background investigations of applicants. Some agencies felt that background investigations were adequately performed, but that complaint investigations and enforcement of regulations would benefit from additional personnel.

### ADEQUACY OF PRESENT REGULATION

Eleven regulatory agencies felt that present regulations, enforcement mechanisms, and sanctions were inadequate; 14 found them adequate; and 14 would not venture an opinion. However, as indicated in preceding sections, nearly all of the agencies recommended improvements in some aspect of current regulation.

Table 33 indicates the regulators' estimates of new staff members required to fully implement all recommended changes in regulation. The range is from 0 to 12 total new employees, 0 to 8 of whom would be investigators.

Several of the agencies recommended changes in regulatory mechanisms or sanctions. Those not covered in earlier sections of this report are described below.

Table 30  
REGULATORY AGENCY SURVEY: BUDGET AND STAFF LEVEL

	Regulatory staff			Budget (dollars) <sup>a</sup>
	Total	Clerical	Investigative	
<b>States:</b>				
California.....	6	4	2	105,000
Connecticut.....	6	3	2	.....
Delaware.....	.....	1	.....	.....
Florida.....	14	7	7	.....
Indiana.....	1	1	0	.....
Iowa.....	2	1	1	.....
Kentucky.....	3	1	1	.....
Maryland.....	4	2	2	50,000
Michigan.....	3½	1	2	57,000
Minnesota.....	2	1	1/10	.....
Nebraska.....	2	1	0	.....
Nevada.....	½	.....	.....	6,100
New Jersey.....	3	1	2	.....
North Dakota.....	3	2	0	.....
Ohio (Peace Officer Training Council).....	.....	.....	.....	.....
Texas.....	2	1	0	29,000
Total.....	52	27	19	.....
Average.....	3.7	1.9	1.5	49,400
<b>Cities and counties:</b>				
Birmingham, Ala.....	0	0	0	0
Los Angeles, Calif.....	3	2	0	.....
Oakland, Calif.....	7	3	4	.....
San Jose, Calif.....	1	1	0	0
San Diego County.....	2	1	1	.....
Denver, Colo.....	8	5	3	.....
Wichita, Kans.....	2	0	2	0
Baltimore, Md.....	.....	.....	.....	.....
Kansas City, Mo.....	4	2	1	20,000
St. Louis, Mo.....	11	4	6	* 27,000
St. Louis County.....	2	1	1	14,000
Newark, N.J.....	0	0	0	.....
Cleveland, Ohio.....	3	0	2	.....
Oklahoma City, Okla.....	1	0	1	.....
Salem, Ore.....	5	2	3	.....
Pittsburgh, Pa.....	.....	.....	.....	.....
Dallas, Tex.....	6	2	4	42,000
Richmond, Va.....	1	0	1	.....
King County, Wash.....	2	1	1	.....
Washington, D.C.....	.....	.....	.....	.....
City A.....	1	0	1	.....
City B.....	3	1	2	.....
City C.....	2	2	0	.....
Total.....	64	27	-33	.....
Average.....	3.4	1.4	1.7	<sup>b</sup> 15,000

<sup>a</sup> Plus salaries. Assuming reasonable values for clerical and investigative salaries, the total budget would be on the order of \$100,000.

<sup>b</sup> This figure rises to \$44,000 if St. Louis salaries are included.

Table 31  
REGULATORY AGENCY SURVEY: CURRENT WORKLOAD

	Man-hours expended per application	Man-hours expended per complaint	No. of licenses or registrants per regulatory staff member
States:	2.5	4 to 16	378
California	18 to 24	6 to 12	16
Connecticut			51
Delaware	8	16	142
Florida		Varies	50
Indiana			49
Iowa	16	16 to 40	39
Kentucky	10	8	103
Maryland	20	40	47
Michigan			262
Minnesota	5 to 7	Varies	110
Nebraska		10	104
Nevada	32	Varies	6
New Jersey			
North Dakota			163
Ohio (Peace Officer Training Council)			
Texas			109
Average State	14.4	17.2	
Cities and counties:			596
Birmingham, Ala.	3	6	86
Los Angeles, Calif.	1.5	Varies	12
Oakland, Calif.			293
San Jose, Calif.			188
San Diego County	4	4	231
Denver, Colo.	2	3 to 4	
Wichita, Kans.			373
Baltimore, Md.	0.5	4	231
Kansas City, Mo.	9	12	400
St. Louis, Mo.	4	6	
St. Louis County	0		369
Newark, N.J.	2	4	316
Cleveland, Ohio	2	5	6
Oklahoma City, Okla.	8	Varies	
Salem, Oreg.			500
Pittsburgh, Pa.	1.5	2	300
Dallas, Tex.	16		110
Richmond, Va.	1.5		
King County, Wash.			50
Washington, D.C.	10	1	4
City A	9	Varies	
City B	15		
City C			24
Average Locality	5.3	4.7	

Table 32  
REGULATORY AGENCY SURVEY: ADEQUACY OF CURRENT STAFF LEVEL

	Is the current regulatory staff level adequate to implement the present statute?	New staff needed		Use of personnel
		Total /percent New personnel	Total /percent new investigatory personnel	
States:				
California	Yes			
Connecticut	No	2 /33	2 /100	Background investigations.
Delaware	Yes			
Florida	No	6 /43	4 /57	All regulatory functions.
Indiana	No	5 /500	4 /—	Field investigations.
Iowa	No	1 /50	1 /100	
Kentucky	Yes			
Maryland	No	3 /75	2 /100	Spot checks in the field.
Michigan	No	3 /86	2 /100	Investigate complaints, enforce regulations.
Minnesota	No	1 /50	1 /—	
Nebraska	Yes			
Nevada	Yes			
New Jersey	No	3 /100	2 /100	Investigation of applicants and complaints.
North Dakota	Yes			
Ohio (Peace Officer Training Council)				
Texas	No	4 /200	2 /—	All functions.
Average State		/126	/92	
Cities and counties:				
Birmingham, Ala.				
Los Angeles, Calif.	Yes			
Oakland, Calif.	No	2 /29	1 /25	Records and correspondence.
San Jose, Calif.				
San Diego Co., Calif.	No	2 /100	1 /100	Background and field investigations.
Wichita, Kans.	No	2 /100	2 /100	Background investigations.
Baltimore, Md.				
Kansas City, Mo.	Yes			
St. Louis, Mo.	Yes			
St. Louis Co., Mo.	No	2 /100	1 /100	Inspection and liaison.
Newark, N.J.				Background investigations.
Cleveland, Ohio	Yes			
Oklahoma City, Okla.				
Salem, Oreg.	Yes			
Pittsburgh, Pa.				
Dallas, Tex.	Yes			
Richmond, Va.	Yes			
King Co., Wash.	No	2 /100	2 /200	
Washington, D.C.				
City A	Yes			
City B	No	1 /33	1 /50	
City C	Yes			
Average City		/77	/96	

Table 33  
REGULATORY AGENCY SURVEY: ADEQUACY OF PRESENT REGULATION

	Are present regulations adequate?	Total new regulatory staff members needed to implement all recommended changes	
		Total personnel	Investigatory personnel
<b>States:</b>			
California.....	No.....		
Connecticut.....	Yes.....	2	2
Delaware.....	Yes.....		
Florida.....	No.....	12	6
Indiana.....		5	4
Iowa.....		4	2
Kentucky.....	No.....	Few	
Maryland.....	Yes.....		
Michigan.....	No.....	10	8
Minnesota.....		1	1
Nebraska.....	No.....		
Nevada.....	Yes.....	0	
New Jersey.....		3	2
North Dakota.....		0	
Ohio (Peace Officer Training Council).....			
Texas.....		13	8
<b>Cities and counties:</b>			
Birmingham, Ala.....	No.....		
Los Angeles, Calif.....		0	0
Oakland, Calif.....	Yes.....		
San Jose, Calif.....			
San Diego County.....	Yes.....		
Denver, Colo.....	Yes.....		
Wichita, Kans.....	No.....		
Baltimore, Md.....			
Kansas City, Mo.....	No.....		8
St. Louis, Mo.....	No.....	0	0
St. Louis County.....	Yes.....	2	1
Newark, N.J.....	No.....		
Cleveland, Ohio.....	Yes.....		
Oklahoma City, Okla.....			
Salem, Oreg.....	Yes.....	0	
Pittsburgh, Pa.....			
Dallas, Tex.....	Yes.....	0	
Richmond, Va.....	Yes.....		
King County, Wash.....	Yes.....		
Washington, D.C.....			
City A.....	Yes.....	0	
City B.....	No.....	0	
City C.....			

**Oakland, California**

Oakland presently has an ordinance requiring specified levels of physical protection for businesses.

**California**

The disciplinary procedure in the state of California is perhaps more cumbersome and unwieldy than most. The exacting, expensive, and very lengthy procedure limits the utilization of formal discipline for budgetary reasons, if for no other. The statute makes no provision for informal settlements, but in practice the agency is successful in securing compliance and adjusting disputes in all the lesser complaints.

Fines should be provided as an alternate sanction.

**Kansas City, Missouri**

Present ordinances provide for legal action only against the individual employee. Legal sanctions against the private security agency itself would be desirable.

**St. Louis, Missouri**

Better control might be achieved if the contract security suppliers were licensed by the city. Then improper conduct on the part of the security agency would provide the regulatory agency with recourse against the business itself as well as against the individual licensed employee.

**New Jersey**

Offenses now classified as indictable misdemeanors could be downgraded so that they could be disposed of in Municipal or County District courts.

**North Dakota**

Rather than licensing private investigators and enacting laws setting forth what they can do, the state should require a sizable bond, issue no licenses, enact laws setting forth what private investigators cannot do, and provide stiff penalties. This would tend to remove an erroneous image of state sanction.

**LEVEL OF REGULATION: STATE OR LOCAL**

Not surprisingly, the present state regulatory agencies unanimously agreed that the private security industry should be regulated at the state level. However, their opinion was divided equally on whether local or federal regulations should also exist. Seven state agencies would allow additional local regulation, while 4 felt that some federal regulation would be appropriate (see Table 34).

The present local regulatory agencies were unanimously in favor of local regulation and unanimously against any federal regulation. However, 11 favored state regulation, while only 2 opposed it.

Opinions expressed on the division of regulatory responsibility are recorded below. In brief, the comments typically indicate a desire for state-level regulation to avoid duplication and encourage uniformity, but also a desire for local tailoring and implementation of certain aspects of the regulation on grounds that local agencies have closer contact with the industry.

**California**

Employees should be cleared by local jurisdictions; however, once cleared, there should be means for avoiding duplicate clearance in several neighboring jurisdictions.\*

Local regulatory agencies are infinitely better equipped than the state agencies to detect, investigate, and prosecute misconduct on the part of security employees. The negligible number of cases of employee misconduct that was reported to the State Bureau in California demonstrates (1) that a state agency is not a handy place to turn to and (2) that the localities must be handling their own problems.

Most private security agencies operate in geographic areas too small to make federal regulation practical and too large to allow cities and other local jurisdictions to control without excessive duplication. Basically, state regulation is best. Federal laws regulating the use of communications devices, the use of the mail, and crimes in interstate commerce are sufficient. Localities should regulate uniforms, weapons permits, employee clearances, and enforcement of the penal code.

**Denver, Colorado**

Regulation should be at the local level, since problems are local in nature.

**Kentucky**

Regulation should be vested primarily at the state level, since many private police agencies operate across local, political subdivision jurisdictions. However, final approval for licensing of agencies should require endorsements of the public police in each locality where they maintain an office.

\* A good example is Los Angeles County, in which a contract guard, from time to time, might work in many cities as well as in unincorporated county territory.

Table 34  
REGULATORY AGENCY SURVEY: GOVERNMENTAL LEVEL OF REGULATION

Jurisdiction	Recommended governmental level of regulation		
	Local	State	Federal
<b>States:</b>			
California.....	Yes.....	Yes.....	Yes.....
Connecticut.....		Yes.....	No.....
Delaware.....	No.....	Yes.....	No.....
Florida.....	Yes.....	Yes.....	
Indiana.....			
Iowa.....	No.....	Yes.....	No.....
Kentucky.....	Yes.....	Yes.....	
Maryland.....	Yes.....	Yes.....	Yes.....
Michigan.....	No.....	Yes.....	No.....
Minnesota.....	No.....	Yes.....	No.....
Nebraska.....		Yes.....	
Nevada.....	No.....	Yes.....	
New Jersey.....	Yes.....	Yes.....	
North Dakota.....	Yes.....	Yes.....	Yes.....
Ohio (Peace Officer Training Council).....		Yes.....	
Texas.....	Yes.....	Yes.....	Yes.....
<b>Cities and counties:</b>			
Birmingham, Ala.....			
Los Angeles, Calif.....	Yes.....		
Oakland, Calif.....	Yes.....	Yes.....	No.....
San Jose, Calif.....		Yes.....	
San Diego County.....			
Denver, Colo.....	Yes.....		
Wichita, Kans.....	Yes.....	Yes.....	
Baltimore, Md.....			
Kansas City, Mo.....		Yes.....	
St. Louis, Mo.....	Yes.....	No.....	No.....
St. Louis County.....	Yes.....	Yes.....	
Newark, N.J.....		Yes.....	
Cleveland, Ohio.....	Yes.....		
Oklahoma City, Okla.....			
Salem, Oreg.....	Yes.....	Yes.....	
Pittsburgh, Pa.....			
Dallas, Tex.....	Yes.....	Yes.....	
Richmond, Va.....	Yes.....		
King County, Wash.....	Yes.....	No.....	No.....
Washington, D.C.....			
City A.....	Yes.....	Yes.....	
City B.....	Yes.....	Yes.....	
City C.....	Yes.....	Yes.....	

**Maryland**

Federal responsibility might be desirable if the private security agency operation extends beyond state boundaries.

**Michigan**

Enforcement is difficult now and would be that much more difficult if federal regulations were de-

veloped. If local agencies regulated, there would be too many regulatory agencies.

**Minnesota**

Regulation at more than one level involves needless overlap and inefficiency.

**Kansas City, Missouri**

State regulation would assure uniformity.

**St. Louis, Missouri**

Since the public responsibility for the contact and actions of any personnel exercising police powers rests on the local police, all control should be at the local level.

**St. Louis County, Missouri**

The regulation of security agencies and employees should be established by state law. The state should establish requirements which define various categories of private security officers, the qualifications of each category, bonds, fees, and type of training.

The administration of the program should be at the local level, with a processing fee retained by the local agency.

The type of regulations could be distinguished upon the basis of whether or not the licensee will be armed.

**Nevada**

State control eliminates the duplication arising when agencies do business in two or more localities.

**Newark, New Jersey**

State regulation would appear to be most logical, since most local jurisdictions cover small geographic areas, while most of the security agencies cross local geographical lines. Regulations should be general in nature and cover the entire industry.

**Ohio**

Uniform regulations across localities are needed.

**Salem, Oregon**

Regulations should be standard throughout the state. This could be accomplished by setting up rules and regulations governing this type of business. However, agencies should be licensed by the city in which they operate.

**Texas**

The only federal regulation should be to assure constitutional rights and to encourage uniformity in all states. Also, a federal agency could serve as a clearinghouse for all state and local agencies.

**Richmond, Virginia**

Local authorities can relate more closely to the industry and have a better understanding of problems encountered.

**City B**

Licensing should be done at the state level, with the issuance of weapon permits, establishment of uniform regulations and equipment requirements, and registering of all employees done on the county level so that regulations can be best suited to the problems indigenous to the counties.

APPENDIX A: Summary of Private Security Regulation in Each State

REGULATION OF PRIVATE SECURITY BY STATE OF ALABAMA

Details of regulation	Business or personnel regulated: Private contract detective agencies
Regulatory agency.	
Method of regulation -----	State business license only.
Licensing requirements: Written examination. Length of residency. U.S. citizen. Age limits. Photograph. Fingerprints. Prior investigative, security, or law enforcement experience  Educational level. Criminal record check.  Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period.	
License fees -----	\$100.
Bond/insurance. Special ID cards. Special badge. Special uniform. Training required.	
Legal authority above that of ordinary citizen.	
Hand guns: Additional license required. Restrictions.	
Proficiency test.	

\* SS means statute is silent.

Other information:

Any other regulation is at city and/or county level.

REGULATION OF PRIVATE SECURITY BY STATE OF ALASKA

Details of regulation	Business or personnel regulated: Private contract detective business
Regulatory agency -----	Department of Revenue.
Method of regulation -----	State business license only.
Licensing requirements: Written examination. Length of residency. U.S. citizen. Age limits. Photograph. Fingerprints. Prior investigative, security, or law enforcement experience  Educational level. Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period ----- License fees -----	One year. One-half percent gross receipts between \$20,000 and \$100,000, plus one-fourth percent of additional gross receipts above \$100,000.
Bond/insurance.	
Special ID cards. Special badge. Special uniform. Training required.	
Legal authority above that of ordinary citizen.	
Hand guns: Additional license required. Restrictions.	
Proficiency test.	

\* SS means statute is silent.

Other information:  
Other regulation is at the city and/or county level.

REGULATION OF PRIVATE SECURITY BY STATE OF ARIZONA

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements: Written examination. Length of residency. U.S. citizen. Age limits. Photograph. Fingerprints. Prior investigative, security, or law enforcement experience  Educational level. Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period. License fees.	
Bond/insurance.	
Special ID cards. Special badge. Special uniform. Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required. Restrictions.	
Proficiency test.	

Other information:  
Any regulation is at the city and/or county level.

REGULATION OF PRIVATE SECURITY BY STATE OF ARKANSAS  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract investigator agency
Regulatory agency -----	Investigator licensing board.
Method of regulation -----	Licensing of agency and investigative personnel employed over 30 days.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	False statement on application; violation of license act; conviction of a felony or moral turpitude misdemeanor; incompetency or conduct against the public interest.
Grounds for suspension or revocation -----	Same as grounds for denial.
Penalties -----	Violating provisions of Act is a misdemeanor with a fine of \$100 to \$500 or imprisonment of 30 to 90 days.
License or registration period -----	One year.
License fees -----	\$25 application fee; license fee \$50 to \$100 annually.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Act does not apply to insurance or in-house investigators, or special police officers appointed by the state or a city.

REGULATION OF PRIVATE SECURITY BY STATE OF ARKANSAS  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Investigator Licensing Board.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	None.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	SS *
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	See Education.
Educational level -----	Bachelor's degree or 5 years investigative experience.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or misdemeanor involving moral turpitude; false application; violation of rules established by the Board; being a drunkard or mental incompetent; demonstration of unworthiness or incompetency; not honest, truthful, morally fit or person of integrity.
Grounds for suspension or revocation -----	Same as grounds for denial, plus failure to inform a subject of the nature and of the voluntariness of the examination, or failure to inform the subject of the results of the examination upon the subject's request.
Penalties -----	Misdemeanor for violation of Act—\$100 to \$1,000 fine and/or 6 months imprisonment.
License or registration period -----	One year.
License fees -----	\$20 examination fee; \$60 license fee.
Bond/insurance -----	\$1,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	One year internship, or 6 months internship plus polygraph school completion.
Legal authority above that of ordinary citizen -----	SS.
Handguns; Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Act of one examiner or trainee will not affect employer. Must inform the person being examined of the nature and voluntariness of the examination. Results of the examination must be disclosed to the subject on request.

**REGULATION OF PRIVATE SECURITY BY STATE OF CALIFORNIA**  
(page 1 of 4 pages)

Details of regulation	Business or personnel regulated: Private contract investigator agency
Regulatory agency -----	Bureau of Collection and Investigative Services.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS *.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes, two sets required.
Prior investigative, security, or law enforcement experience -----	Two years prior experience in investigative work.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Felony conviction; falsification of fingerprints or photographs; illegally using or carrying weapons; bad moral character; previous refusal or revocation of license; being a partner, officer, or manager of one who had license revoked; making false statements on application; while unlicensed, committing any act that required a license; or committing any act of fraud.
Grounds for suspension or revocation -----	False statement on application; violation of rules of Director; conviction of felony; impersonation of a law-enforcement officer of the United States; committing assault, battery, or kidnapping; knowing violation of any court order; commission of any act that is grounds for denial of application; using letterhead or advertisement that misleads public; using name different than that under which he is currently licensed; commission of any act of dishonesty or fraud, such as falsification of records or application, illegal means of collecting debts, or manufacture of evidence.
Penalties -----	Suspension or fine, at discretion of Director.
License or registration period -----	Two years.
License fees -----	\$100.
Bond/insurance -----	\$2,000.
Special ID cards -----	Yes.
Special badge -----	No.
Special uniform -----	Must not be similar to public police uniforms.
Training required -----	Firearms training will become mandatory under new regulations.
Legal authority above that of ordinary citizen -----	No.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

A person may not act as manager of licensee until his qualifications have been demonstrated by a written or oral examination and his good character proven. The licensee must notify the Director of any change in management within 30 days. Licensee is responsible for the good conduct of his employees. Licensee may act as a private patrol operator. Act does not apply to: a person employed regularly by only one employer in connection with the affairs of the employer; an officer or employee of the U.S. Government or California while said officer is performing his official duties; persons engaged in financial ratings (Dunn and Bradstreet); and patrol special officers appointed by the police commission of any city or county. Local authorities may impose local regulations on private patrol operators, or the employees, such as registration with an agency designated by the city. Licensee shall maintain employee records—name, address, commencing date of employment, position of employee, and termination date.

**REGULATION OF PRIVATE SECURITY BY STATE OF CALIFORNIA**  
(page 2 of 4 pages)

Details of regulation	Business or personnel regulated: Private contract guard or patrol agency
Regulatory agency -----	Bureau of Collection and Investigative Services.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	At discretion of Director.
Length of residency -----	SS *.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Two sets required.
Prior investigative, security, or law enforcement experience -----	One year as a watchman or the equivalent.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for Investigative Agency (see page 1).
Grounds for suspension or revocation -----	Same as for Investigative Agency.
Penalties -----	Same as for Investigative Agency.
License or registration period -----	Two years.
License fees -----	\$25 for application; \$100 for license.
Bond/insurance -----	\$2,000.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Must not be similar to public police.
Training required -----	Firearms training will become mandatory under new regulations.
Legal authority above that of ordinary citizen -----	No.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

Licensee may make no investigations other than those incidental to role in a guard or patrol case. See "Other Information" regarding Investigative Agencies (page 1).

**REGULATION OF PRIVATE SECURITY BY STATE OF CALIFORNIA**  
(page 3 of 4 pages)

Details of regulation	Business or personnel regulated: Insurance adjuster (business)
Regulatory agency -----	Bureau of Collection and Investigative Services.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	At discretion of Director.
Length of residency -----	SS *.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Two sets required.
Prior investigative, security, or law enforcement experience -----	One year as an adjuster or the equivalent.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for Investigative Agency (see page 1).
Grounds for suspension or revocation -----	Same as for Investigative Agency.
Penalties -----	Same as for Investigative Agency.
License or registration period -----	Two years.
License fees -----	\$25 for application; \$50 for license.
Bond/insurance -----	\$2,000.
Special ID cards -----	Yes.
Special badge -----	No.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	No.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**REGULATION OF PRIVATE SECURITY BY STATE OF CALIFORNIA**  
(page 4 of 4 pages)

Details of regulation	Business or personnel regulated: Repossessor (business)
Regulatory agency -----	Bureau of Collection and Investigative Services.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	At discretion of Director.
Length of residency -----	SS *.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Two sets required.
Prior investigative, security, or law enforcement experience -----	One year as a reposessor or the equivalent.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for the Investigative Agency (see page 1).
Grounds for suspension or revocation -----	Same as for the Investigative Agency.
Penalties -----	Same as for the Investigative Agency.
License or registration period -----	Two years.
License fees -----	\$25 for application; \$100 for license.
Bond/insurance -----	\$2,000.
Special ID cards -----	Yes.
Special badge -----	No.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	No.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Cannot collect claims on lost property.

REGULATION OF PRIVATE SECURITY BY STATE OF COLORADO

Details of regulation	Business or personnel regulated: Private contract detective agency
Regulatory agency -----	Secretary of State.
Method of regulation -----	License.
Licensing requirements:	Yes.
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	Failure to conduct business with full regard for state laws.
Penalties -----	Suspension; revocation. If misdemeanor, \$300 to \$1,000 fine, 3 to 12 months imprisonment.
License or registration period -----	Two years.
License fees -----	\$100.
Bond/insurance -----	Yes, with two sureties (\$3,000 to \$20,000).
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

REGULATION OF PRIVATE SECURITY BY STATE OF CONNECTICUT  
(page 1 of 3 pages)

Details of regulation	Business or personnel regulated: Private contract investigator business
Regulatory agency -----	State Police.
Method of regulation -----	Licensing.
Licensing requirements:	SS *
Written examination -----	SS.
Length of residency -----	Yes.
U.S. citizen -----	Minimum 25 years old.
Age limits -----	Yes.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Five years experience as investigator with state, federal, municipal, or private agency. May substitute educational preparation for occupation for one year experience.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Moral turpitude or felony conviction; other than honorable military discharge; not having good moral character, integrity, or competency; being a member of the public police force.
Grounds for suspension or revocation -----	Violation of any regulations; practice of fraud, deceit, or misrepresentation; material misstatement in the application; demonstration of incompetence or untrustworthiness; conviction of a felony or other crime affecting licensee's honesty, integrity, or moral fitness; 10 percent or more of the corporation is owned by a person who cannot meet the character standards required of an applicant.
Penalties -----	\$5,000 and/or 1 year imprisonment.
License or registration period -----	One year.
License fees -----	\$300/individual (renewal \$200); \$400/agency (renewal \$300).
Bond/insurance -----	\$10,000.
Special ID cards -----	Yes.
Special badge -----	No badge may be used.
Special uniform -----	Yes—distinctive.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes (\$2 fee).
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

No public police officer may be appointed as detective, investigator, guard, or watchman.

REGULATION OF PRIVATE SECURITY BY STATE OF CONNECTICUT

(page 2 of 3 pages)

Details of regulation	Business or personnel regulated: Contract watchman, guard, or patrol service
Regulatory agency -----	State Police.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS <sup>a</sup> .
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 25 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience.	Five years as supervisor or administrator in industrial security, guard, or patrol service, or investigator.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for Investigator Business.
Grounds for suspension or revocation -	Same as for Investigator Business.
Penalties -----	Same as for Investigator Business.
License or registration period -----	One year.
License fees -----	Same as for Investigator Business.
Bond/insurance -----	\$10,000.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes—distinctive.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	
Restrictions -----	
Proficiency test -----	

<sup>a</sup> SS means statute is silent.

Other information:

No public police officer may be appointed as detective, investigator, guard, or watchman.

REGULATION OF PRIVATE SECURITY BY STATE OF CONNECTICUT

(page 3 of 3 pages)

Details of regulation	Business or personnel regulated: Employees of any licensee
Regulatory agency -----	State Police.
Method of regulation -----	Registration.
Licensing requirements:	
Written examination -----	SS <sup>a</sup> .
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 18 years old, to 21 for trainee; 21 years old as a regular.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience	None.
Educational level -----	None.
Criminal record check -----	Yes.
Grounds for denial -----	Felony or moral turpitude crime conviction; being an alcoholic, drifter, or vagrant; having mental illness history; having dishonorable military discharge.
Grounds for suspension or revocation -	Same as for Investigator Business.
Penalties -----	Same as for Investigator Business.
License or registration period -----	One year.
License fees -----	SS.
Bond/insurance -----	\$10,000.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes—distinctive.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes (\$2 fee).
Restrictions -----	Carry only on duty.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

Other information:

No public police officer may be appointed as detective, investigator, guard, or watchman.

REGULATION OF PRIVATE SECURITY BY STATE OF DELAWARE

Details of regulation	Business or personnel regulated: Private contract detective, guard, or patrol business
Regulatory agency	Board of Examiners, headed by State Police Superintendent.
Method of regulation	Licensing business; employee data must be submitted to State Police.
Licensing requirements:	
Written examination	SS *
Length of residency	SS.
U.S. citizen	SS.
Age limits	Minimum of 25 years old.
Photograph	SS.
Fingerprints	Yes.
Prior investigative, security, or law enforcement experience	Five years with public police or investigative agency.
Educational level	SS.
Criminal record check	Yes.
Grounds for denial	SS.
Grounds for suspension or revocation	Violation of law or Board regulations.
Penalties	\$500 fine and/or 1 year imprisonment.
License or registration period	Two years.
License fees	\$200 to \$300.
Bond/insurance	\$3,000 to \$5,000.
Special ID cards	Yes (license and employees).
Special badge	Yes.
Special uniform	SS.
Training required	SS.
Legal authority above that of ordinary citizen	SS.
Handguns: Additional license required	Yes (\$2 fee.)
Restrictions	SS.
Proficiency test	SS.

\* SS means statute is silent.

Other information:

Law excludes insurance and credit investigators, and alarm businesses from licensing. Firms prohibited from hiring persons with felony and certain types of misdemeanor convictions. Detailed data and fingerprints on each employee must be submitted to the State Police within 48 hours after employment. No misleading advertising or unauthorized disclosure of privileged information permitted.

REGULATION OF PRIVATE SECURITY BY STATE OF FLORIDA  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract guard, patrol, or investigative agency
Regulatory agency	Secretary of State; Bureau of Licensing.
Method of regulation	Licensing.
Licensing requirements:	
Written examination	SS *
Length of residency	SS.
U.S. citizen	Yes.
Age limits	Minimum 21 years old.
Photograph	Yes.
Fingerprints	Yes.
Prior investigative, security, or law enforcement experience	Three years (one of which must be in the state, performing services in the field in which the license is requested).
Educational level	Yes.
Criminal record check	Yes.
Grounds for denial	Not of good character, competency, or integrity; conviction of a felony where civil rights have not been restored; conviction of crime involving moral turpitude or dishonest dealings; falsifying application; operating unlicensed.
Grounds for suspension or revocation	Fraud or willful misrepresentation in application; willful and knowing violation of any of the provisions of the Act by the licensee or any of his employees; if the licensee or anyone in his employ has been adjudged guilty of a crime involving moral turpitude; a false statement by the licensee that any person is or has been in his employ; willful betrayal of a professional secret; if the licensee or any of his employees is incompetent, or is guilty of conduct against the interest of the general public, or has been convicted of a felony; failure to maintain bond; impersonation of a law enforcement officer; willful failure or refusal to render to a client services or a report as agreed; use of force or violence on any person except in self defense or in the defense of a client; acting as a runner or a capper for any attorney; commission of any act which is a ground for a denial of an application for license.
Penalties	Misdemeanor violation of licensing provisions—\$100 to \$1,000 and/or 1 year imprisonment. Civil penalty may be assessed by Department of State not to exceed \$100.
License or registration period	One year.
License fees	\$25 to \$100.
Bond/insurance	\$5,000.
Special ID cards	Yes.
Special badge	SS.
Special uniform	SS.
Training required	SS.
Legal authority above that of ordinary citizen	SS.
Handguns: Additional license required	Yes.
Restrictions	SS.
Proficiency test	SS.

\* SS means statute is silent.

Other information:

Law not applicable to insurance adjusters, in-house forces, central station burglar and fire alarm companies, attorneys, or credit investigators.

**REGULATION OF PRIVATE SECURITY BY STATE OF FLORIDA**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Secretary of State.
Method of regulation -----	Licensing of personnel.
Licensing requirements:	
Written examination -----	No.
Length of residency -----	One year.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	(also applies to Education, below) Bachelor's degree may be waived for 5 years experience as an investigator with state, federal, or local police, plus high school graduation.
Educational level -----	Bachelor's degree or high school graduation, plus experience.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for investigative license (see page 1), plus not having reputation for fair dealing, or not having honorable military discharge.
Grounds for suspension or revocation -----	Same grounds as for private investigator.
Penalties -----	Misdemeanor violations of provisions of Act—\$100 to \$1,000 and/or 1 year im- prisonment.
License or registration period -----	One year.
License fees -----	\$50 for examiner, \$10 for intern.
Bond/insurance -----	\$5,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	Six-week course at approved training school, plus 1 year internship under licensed polygraph examiner prior to obtaining examiner's license.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

License for interns has same requirements as license for examiners, with the exception of the 1 year internship.

**REGULATION OF PRIVATE SECURITY BY STATE OF GEORGIA**

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Board of Polygraph Examiners.
Method of regulation -----	License personnel.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS*.
U.S. citizen -----	Yes.
Age limits -----	21 years.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	See Education.
Educational level -----	Bachelor's degree or high school diploma and 5 years investigative experience with a government agency.
Criminal record check -----	Yes.
Grounds for denial -----	Not a person of honesty, truthfulness, integrity, moral fitness, or of reputation for fair dealing; conviction of a misdemeanor involving moral turpitude, or a felony.
Grounds for suspension or revocation -----	All grounds for denial plus violation of Licensing Act; misrepresentation in application.
Penalties -----	Misdemeanor for violation of Act.
License or registration period -----	One year.
License fees -----	\$50.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	Six weeks at an approved polygraph school and 6 months internship.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes (\$3 fee, plus \$300 bond).
Restrictions -----	SS.
Proficiency test -----	No.

\* SS means statute is silent.

**Other information:**

Any other regulation is at the city and/or county level.

REGULATION OF PRIVATE SECURITY BY STATE OF HAWAII

Details of regulation	Business or personnel regulated: Private contract guard or detective business
Regulatory agency -----	Board of Private Detectives and Guards.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	One year.
U.S. citizen -----	Yes.
Age limits -----	25 years for licensee; 21 years for employee.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Four years relevant experience.
Educational level -----	High school or equivalent for licensee; 8th grade for employees.
Criminal record check -----	Yes, for licensee.
Grounds for denial -----	Conviction of a felony or offense involving moral turpitude; not of good moral character.
Grounds for suspension or revocation -----	Violation of provisions of Act.
Penalties -----	Maximum of \$500 fine and/or 1 year imprisonment.
License or registration period -----	One year.
License fees -----	\$37.50.
Bond/insurance -----	\$5,000.
Special ID cards -----	SS *.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Act does not apply to credit bureaus, insurance adjusters, or attorneys. Licensee may not employ any person who has been convicted for a felony or crime involving moral turpitude.

REGULATION OF PRIVATE SECURITY BY STATE OF IDAHO

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation -----	
Licensing requirements:	
Written examination -----	
Length of residency -----	
U.S. citizen -----	
Age limits -----	
Photograph -----	
Fingerprints -----	
Prior investigative, security, or law enforcement experience -----	
Educational level -----	
Criminal record check -----	
Grounds for denial -----	
Grounds for suspension or revocation -----	
Penalties -----	
License or registration period -----	
License fees -----	
Bond/insurance -----	
Special ID cards -----	
Special badge -----	
Special uniform -----	
Training required -----	
Legal authority above that of ordinary citizen -----	
Handguns: Additional license required -----	
Restrictions -----	
Proficiency test -----	

Other information:

Any regulation is at the city and/or county level.

REGULATION OF PRIVATE SECURITY BY STATE OF ILLINOIS

(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract guard, patrol, or detective agency
Regulatory agency -----	Department of Registration and Education.
Method of regulation -----	Licensing agency; registering employees.
Licensing requirements:	
Written examination -----	Yes (\$50 fee).
Length of residency -----	SS *
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes (licensee and employees).
Prior investigative, security, or law enforcement experience -----	Three years as a (1) private detective, (2) employee of a private security agency, (3) federal investigator, (4) sheriff or deputy, or (5) municipal policeman at a rank higher than a patrolman.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony; dishonorable discharge from military service; or not honest, truthful, competent, or of integrity.
Grounds for suspension or revocation -----	Fraud or willful misrepresentation in obtaining a certificate; violation of any of the terms and provisions of the Act; conviction of a felony, or conviction of any crime involving moral turpitude; willful betrayal of a professional secret or secrets; making false or misleading advertisement or statements; having demon- strated unworthiness or incompetency.
Penalties -----	\$25 to \$500 fine and/or 6 months imprisonment.
License or registration period -----	One year.
License fees -----	\$100/agency; \$3/each employee; \$50/agency renewal.
Bond/insurance -----	\$1,000.
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Firearm owner's ID card required.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Law does not apply to credit investigators and in-house security forces. Employees must be registered with the Director of Registration and Education and meet minimum qualifications, which are similar to those for the licensee, with the exception of the experience and examination requirement.

REGULATION OF PRIVATE SECURITY BY STATE OF ILLINOIS

(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Department of Registration and Education.
Method of regulation -----	Licensing personnel.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS *
U.S. citizen -----	Yes.
Age limits -----	21 years.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	Bachelor's degree.
Criminal record check -----	Yes.
Grounds for denial -----	Not a person of honesty; integrity, truthfulness or moral fitness; dishonorable mili- tary discharge; felony conviction or misdemeanor conviction for a crime involving moral turpitude.
Grounds for suspension or revocation -----	All grounds for denial plus misstatement on application; disregard for or violation of the Act; demonstrated incompetency; mental deficiency.
Penalties -----	\$25 to \$500 and/or 6 months imprisonment.
License or registration period -----	One year.
License fees -----	\$25.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Six months internship and polygraph school, or 12 months internship.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

No license required if exams are conducted for less than 20 days annually; a \$5 registration fee is required for such limited practice.

REGULATION OF PRIVATE SECURITY BY STATE OF INDIANA

Details of regulation	Business or personnel regulated: Private contract patrol, guard, or detective business
Regulatory agency -----	State Police.
Method of regulation -----	Licensing business; registering employees.
Licensing requirements:	
Written examination -----	SS <sup>a</sup> .
Length of residency -----	One year.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Two years under a licensee or equivalent as determined by superintendent.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of felony or possession of dangerous weapon; conviction of an act constituting fraud or dishonesty; bad moral character, intemperate habits or bad reputation for truth, honesty, or integrity; license issuance refused under the Act; action which would result in suspension or revocation of license if licensed.
Grounds for suspension or revocation -----	False information given in connection with an application; violation of any provisions of the Act or rules established by the superintendent; conviction of a felony or any crime involving moral turpitude, illegally using, carrying, or possessing a dangerous weapon; commission of any act in the course of the licensee's business constituting dishonesty or fraud or forcibly and without the consent of the person within lawful possession, entered any building or portion thereof; impersonation of or permitting or aiding and abetting an employee to impersonate a law enforcement officer; commission of any act which is ground for a denial for an application for a license under this Act. (Continued in footnote b.)
Penalties -----	\$100 to \$1,000 fine and/or 1 year imprisonment.
License or registration period -----	Two years.
License fees -----	\$150 for agency plus \$10 per employee (every 2 years).
Bond/insurance -----	\$5,000.
Special ID cards -----	Yes, all employees except office clerks.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

<sup>b</sup> The superintendent may suspend or revoke a license if he determines that the licensee knowingly employed or has in his employment any person who (a) has committed any act, which, if committed by a licensee, would be cause, under this Act, for revocation of a license; (b) has committed any act in violation of this statute; (c) has had a license revoked or suspended under this statute; or (d) has been denied a license under this statute after hearings.

Other information:

Credit and insurance investigators, armored car companies, collection agencies, and contract security firms providing service only at industrial plants are excluded from licensing. Licensee is responsible for good conduct for employees, and may not hire anyone with a felony or moral turpitude crime conviction. Employer must keep record of employees—photograph and fingerprints—and submit a set of fingerprints of every employee (except clerical) to State Police.

REGULATION OF PRIVATE SECURITY BY STATE OF IOWA

Details of regulation	Business or personnel regulated: Private contract detective, guard, or patrol agency
Regulatory agency -----	Commissioner of Public Safety.
Method of regulation -----	License.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS <sup>a</sup> .
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	Yes.
Criminal record check -----	Yes.
Grounds for denial -----	Felony conviction; not of good moral character.
Grounds for suspension or revocation -----	Fraud in obtaining license, violation of provisions of law, conviction for crime involving moral turpitude, guilty of willful betrayal of any information obtained by licensee in the course of conduct of the private detective business, insolvency of surety bond, and failure of applicant to comply with any provision in the law.
Penalties -----	\$100 to \$500 fine, and/or 6 months imprisonment.
License or registration period -----	One year.
License fees -----	\$25 fee for an agency; \$10 fee for an individual.
Bond/insurance -----	\$2,000 for an agency; \$1,000 for an individual.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

Other information:

No agency may employ any person as an agent unless he is issued an ID card. Credit, insurance, and in-house investigators are specifically exempted from licensing.

REGULATION OF PRIVATE SECURITY BY STATE OF KANSAS

Details of regulation	Business or personnel regulated: Contract detective agency
Regulatory agency -----	Attorney General.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Not of good moral character; not of good reputation.
Grounds for suspension or revocation -	See Grounds for Denial.
Penalties -----	\$500 to \$2,500 fine and/or 6 months imprisonment.
License or registration period -----	
License fees -----	\$50.
Bond/insurance -----	\$1,000 to \$10,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Additional regulation may be provided by cities and/or counties.

**CONTINUED**

**1 OF 3**

REGULATION OF PRIVATE SECURITY BY STATE OF KANSAS

Details of regulation	Business or personnel regulated: Contract detective agency
Regulatory agency -----	Attorney General.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Not of good moral character; not of good reputation.
Grounds for suspension or revocation -----	See Grounds for Denial.
Penalties -----	\$500 to \$2,500 fine and/or 6 months imprisonment.
License or registration period -----	\$50.
License fees -----	\$1,000 to \$10,000.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Additional regulation may be provided by cities and/or counties.

REGULATION OF PRIVATE SECURITY BY STATE OF KENTUCKY

(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Special policemen
Regulatory agency -----	Department of Public Safety.
Method of regulation -----	Appointment.
Licensing requirements:	(Nonmandatory).
Written examination -----	SS *
Length of residency -----	Two years in county.
U.S. citizen -----	SS.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of crime involving moral turpitude.
Grounds for suspension or revocation -----	SS.
Penalties -----	\$10 to \$100 fine and/or 30 days imprisonment.
License or registration period -----	Four years.
License fees -----	\$5.
Bond/insurance -----	\$500.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	Must clearly indicate "special police" status; must not look like public police uniform.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Yes, on the properties specified in the commission or while in "hot pursuit".
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
All special police are considered to derive all authority from commission by the governor and are paid by the State Treasurer from funds paid by the employer of the officers.

REGULATION OF PRIVATE SECURITY BY STATE OF KENTUCKY  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Department of Public Safety.
Method of regulation -----	Licensing of personnel.
Licensing requirements:	
Written examination -----	SS *.
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	18 years.
Photograph -----	SS.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Two years as a polygraph examiner or trainee.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Felony conviction, or misdemeanor conviction for a crime involving moral turpitude; dishonorable military discharge.
Grounds for suspension or revocation -----	All of the grounds for denial, plus material misstatement on application; violation of Licensing Act regulations; demonstrated unworthiness or incompetency; or mental deficiency.
Penalties -----	\$20 to \$500 fine.
License or registration period -----	One year.
License fees -----	\$20 initially; \$15 renewal.
Bond/insurance.	
Special ID cards. Special badge. Special uniform. Training required -----	Graduation from an approved polygraph school. See experience required.
Legal authority above that of ordinary citizen.	
Handguns: Additional license required. Restrictions.	
Proficiency test.	

\* SS means statute is silent.

REGULATION OF PRIVATE SECURITY BY STATE OF LOUISIANA  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract detective or watchmen agency
Regulatory agency -----	State Collector of Revenue.
Method of regulation -----	Occupational license.
Licensing requirements:	
Written examination -----	SS *.
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	SS.
Penalties -----	SS.
License or registration period -----	One year.
License fees -----	\$150 to \$200, depending on gross annual receipts.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
All other regulation is provided by municipalities.

REGULATION OF PRIVATE SECURITY BY STATE OF LOUISIANA  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Special officers
Regulatory agency -----	None at state level.
Method of regulation.	
Licensing requirements: Written examination. Length of residency. U.S. citizen. Age limits. Photograph. Fingerprints. Prior investigative, security, or law enforcement experience	
Educational level. Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period. License fees.	
Bond/insurance.	
Special ID cards. Special badge. Special uniform. Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required. Restrictions.	
Proficiency test.	

Other information:

The sheriff of any parish except the Parish of Orleans may request in writing to the police jury that he needs additional special officers because of an emergency situation. After the police jury declares the emergency, the sheriff may appoint as many special officers as he sees fit.

REGULATION OF PRIVATE SECURITY BY STATE OF MAINE

Details of regulation	Business or personnel regulated: Private contract detective
Regulatory agency -----	Secretary of State.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS*
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience	SS.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	SS.
Penalties -----	\$20 fine for improper advertising.
License or registration period -----	Four years.
License fees -----	\$10.
Bond/insurance -----	\$500.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Yes, if licensed.
Handguns: Additional license required -----	Concealed weapon requires license.
Restrictions -----	Carry during working hours only; no license to convicted felons.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Governor may license a maximum of 50 detectives.

REGULATION OF PRIVATE SECURITY BY STATE OF MARYLAND

(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract detective, guard, or patrol business
Regulatory agency -----	Superintendent of State Policy.
Method of regulation -----	Licensing business; registering investigative employees.
Licensing requirements:	
Written examination -----	SS <sup>a</sup> .
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 25 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Five years experience as a full-time licensed investigator, or 10 years experience as a police officer, or 3 years investigative or detective service while a police officer.
Educational level -----	
Criminal record check -----	Yes, licensee and each investigative employee must be checked before commencement of job.
Grounds for denial -----	Giving false statement on application; conducting business without a license; not of good character, competency, or integrity.
Grounds for suspension or revocation -----	Acting as private investigator (patrolman, watchman) without a license; giving false statement on application; falsification of employee records; or violation of licensing law provisions.
Penalties -----	\$1,000 fine and/or 1 year imprisonment.
License or registration period -----	One year.
License fees -----	\$150/individual; \$300/corporation; \$25/each investigative employee.
Bond/insurance -----	\$3,000/individual; \$5,000/corporation.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes.
Restrictions -----	Special concealed-weapon permit required. May not have poor character or felony conviction.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

Other information:

Alarm companies, credit and insurance investigators, and in-house employees are excluded from licensing. Licensee is accountable for good behavior of employees. Employees acting as detectives must be registered at a fee of \$25 and identified by fingerprint and number. Registration of employees other than investigators is not required.

REGULATION OF PRIVATE SECURITY BY STATE OF MARYLAND

(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Special police
Regulatory agency -----	State Police.
Method of regulation -----	Commissioning of personnel.
Licensing requirements:	
Written examination -----	
Length of residency -----	
U.S. citizen -----	Minimum 21 years old.
Age limits -----	SS <sup>a</sup> .
Photograph -----	Yes.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If in the best interest of the state.
Grounds for suspension or revocation -----	If in the best interest of the state.
Penalties -----	\$1,000 fine and/or 6 months imprisonment.
License or registration period -----	Two years.
License fees -----	\$25 initial fee.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes.
Training required -----	May be required.
Legal authority above that of ordinary citizen -----	Yes.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

Other information:

State police may promulgate rules and regulations to carry out the commission law. In-house security personnel may be commissioned.

REGULATION OF PRIVATE SECURITY BY STATE OF MASSACHUSETTS

(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract investigative agencies
Regulatory agency -----	Commissioner of Public Safety.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS *.
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 25 years old.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	Three years as a detective (state, federal, or municipal), or policeman at a rank higher than patrolman within the state.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or crime involving turpitude; not honest or of good moral character.
Grounds for suspension or revocation -----	Failure to comply with licensing regulations; knowingly hiring persons convicted of felony or crime involving moral turpitude.
Penalties -----	\$50 to \$100 fine and/or 1 year imprisonment.
License or registration period -----	One year.
License fees -----	\$500 (\$200 renewal).
Bond/insurance -----	\$5,000.
Special ID cards -----	Yes.
Special badge -----	Must not say "police".
Special uniform -----	Investigators may not wear uniforms.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Provisions do not apply to in-house investigators, credit bureaus, insurance adjusters, or attorneys.

REGULATION OF PRIVATE SECURITY BY STATE OF MASSACHUSETTS

(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract guard or patrol agencies
Regulatory agency -----	Commissioner of Public Safety.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS *.
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 25 years old.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	None required.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for Investigative Agency (see page 1).
Grounds for suspension or revocation -----	Same as for Investigative Agency.
Penalties -----	\$50 to \$1,000 fine and/or 1 year imprisonment.
License or registration period -----	One year.
License fees -----	\$500 (\$200 renewal).
Bond/insurance -----	\$5,000.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Does not apply to in-house personnel.

REGULATION OF PRIVATE SECURITY BY STATE OF MICHIGAN  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract detective agency
Regulatory agency -----	State Police.
Method of regulation -----	Licensing of agency; criminal record check of employee.
Licensing requirements:	SS*.
Written examination -----	Must be a state resident.
Length of residency -----	Yes.
U.S. citizen -----	Minimum 25 years old.
Age limits -----	SS.
Photograph -----	Yes (employees).
Fingerprints -----	Three years as an investigator, or a Bachelor's degree in police administration.
Prior investigative, security, or law enforcement experience -----	High school or equivalent. Yes (licensee and employees).
Educational level -----	Conviction of felony or high misdemeanor; dishonorable discharge from military service.
Criminal record check -----	
Grounds for denial -----	
Grounds for suspension or revocation -----	Giving false information in application; conviction of a felony, high misdemeanor, or crime of moral turpitude; or violation of License Act provisions.
Penalties -----	Revocation of license.
License or registration period -----	Two years.
License fees -----	\$100 if the business is an individual; \$200 if a firm, partnership, or corporation.
Bond/insurance -----	\$5,000/individual business; \$10,000/agency, firm, corporation.
Special ID cards -----	Yes, for manager. Approved employee ID permissible
Special badge -----	Yes, if approved.
Special uniform -----	Yes, if approved.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Must keep investigative reports two years. May not divulge information except to police, employer, and client. Convictions  
must be reported. No misleading advertising. Localities may not license. State Act excludes insurance investigators, debt  
collection personnel, financial investigators, and in-house investigators from licensing. Employee records may be inspected by  
regulatory agency. Employers may not employ felon or person convicted of moral turpitude crime or high misdemeanor.

REGULATION OF PRIVATE SECURITY BY STATE OF MICHIGAN  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Central alarm; contract guard, patrol, police, or armored car business
Regulatory agency -----	State Police.
Method of regulation -----	Licensing business; registering employees.
Licensing requirements:	
Written examination -----	SS*.
Length of residency -----	One year in state for licensee.
U.S. citizen -----	Yes.
Age limits -----	Minimum 25 years/licensee; 21 for employees (18 with permission).
Photograph -----	SS.
Fingerprints -----	Yes (licensee and employees).
Prior investigative, security, or law enforcement experience -----	Two to four years, depending on the type of experience and degree of education.
Educational level -----	High school for licensee; 8th grade for employees.
Criminal record check -----	Yes.
Grounds for denial -----	Licensee or employee convicted for a felony or crime involving moral turpitude in the past 5 years; adjudged insane; other than honorable discharge from military service.
Grounds for suspension or revocation -----	Giving false information in application; violation of Act; conviction of felony, high misdemeanor, or other specified crimes; knowingly employing personnel so convicted.
Penalties.	
License or registration period -----	Two years.
License fees -----	\$100 to \$200.
Bond/insurance -----	\$5,000 to \$10,000 bond or \$20,000 property and \$200,000 personal injury insurance.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes.
Training required -----	A training requirement is prescribed by the Department of State Police for licensed in-house security forces.
Legal authority above that of ordinary citizen -----	No (see Other Information, below).
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Municipalities prohibited from licensing. In-house security forces may voluntarily seek licensing and if licensed, are given  
special police authority when trained, on duty on the employer's premises, and in uniform. Agency or person holding investi-  
gator license may provide guard, etc., services, but not vice versa. Must not divulge confidential information. Must not ad-  
vertise in disapproved manner. Local public officials must approve state license if the business has an office in that locality.

**REGULATION OF PRIVATE SECURITY BY STATE OF MINNESOTA**  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract detective agency
Regulatory agency -----	Department of Public Safety.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	One principal in company must have 3 years public law enforcement experience at a rank higher than patrolman or equivalent special training.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or assault, theft, larceny, unlawful entry, extortion, defamation, buying or receiving stolen property, using, possessing, or carrying weapons or burglar tools, or escape; making false statements on applications.
Grounds for suspension or revocation -----	Any violation of regulations.
Penalties -----	Revocation of license or \$500 fine and/or 1 year imprisonment.
License or registration period -----	Two years.
License fees -----	\$125/individual; \$250/corporation.
Bond/insurance -----	\$5,000.
Special ID cards -----	Yes.
Special badge -----	May not imitate police badges or emblems.
Special uniform -----	Uniforms must not be similar to police uniforms.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

Localities are prohibited from requiring additional licenses. No licensee shall knowingly employ any person not qualified to hold a license. Licensee must not act as a collective agency. A licensed private detective may perform those duties attributable to a protective agent without obtaining an additional license, but a protective agent may not perform the duties of a private detective.

**REGULATION OF PRIVATE SECURITY BY STATE OF MINNESOTA**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Contract guard, patrol, or armored car agency (protective agency)
Regulatory agency -----	Department of Public Safety.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Same as for Investigative Agency (see page 1).
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for Investigative Agency.
Grounds for suspension or revocation -----	Same as for Investigative Agency.
Penalties -----	Same as for Investigative Agency.
License or registration period -----	Two years.
License fees -----	\$62.50/individual; \$125/corporation; \$12.50 for renewal.
Bond/insurance -----	\$5,000.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

See "Other Information" for Investigative Agency (page 1).

REGULATION OF PRIVATE SECURITY BY STATE OF MISSISSIPPI

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Board of Polygraph Examiners.
Method of regulation -----	Licensing of personnel.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS *.
U.S. citizen -----	Yes.
Age limits -----	21 years.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	See Education.
Educational level -----	Bachelor's degree or 5 years investigative experience.
Criminal record check -----	Yes.
Grounds for denial -----	Not a person of honesty, truthfulness, integrity, or moral fitness; conviction of felony or a misdemeanor, crime involving moral turpitude.
Grounds for suspension or revocation -----	Same as grounds for denial, plus failure to inform the subject of the nature and voluntariness of the examination, misstatement in application; violation of provisions of Licensing Act; demonstrated unworthiness or incompetency; habitual drunkenness; mental deficiency; or failure to inform subject of results of examination on request.
Penalties -----	\$100 to \$1000 fine and/or 6 months maximum sentence.
License or registration period -----	One year.
License fees -----	\$50 for examiner; \$30 for intern.
Bond/insurance -----	\$5,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	Twelve months internship or approved polygraph school graduation and 6 months internship.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes (\$2 fee, plus \$2,000 bond—paid by employer).
Restrictions -----	Carry while on duty only. No gun license to convicted felons.
Proficiency test -----	SS *.

\* SS means statute is silent.

Other information:

To act as a private detective or special police, a privilege license must be purchased (\$25) from the municipality or county in which the office will be maintained.

REGULATION OF PRIVATE SECURITY BY STATE OF MISSOURI

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation -----	
Licensing requirements:	
Written examination -----	
Length of residency -----	
U.S. citizen -----	
Age limits -----	
Photograph -----	
Fingerprints -----	
Prior investigative, security, or law enforcement experience -----	
Educational level -----	
Criminal record check -----	
Grounds for denial -----	
Grounds for suspension or revocation -----	
Penalties -----	
License or registration period -----	
License fees -----	
Bond/insurance -----	
Special ID cards -----	
Special badge -----	
Special uniform -----	
Training required -----	
Legal authority above that of ordinary citizen -----	
Handguns: Additional license required -----	
Restrictions -----	
Proficiency test -----	

Other information:

Power to regulate delegated to cities and counties.

REGULATION OF PRIVATE SECURITY BY STATE OF MONTANA

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements: Written examination. Length of residency. U.S. citizen. Age limits. Photograph. Fingerprints. Prior investigative, security, or law enforcement experience.	
Educational level. Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period. License fees.	
Bond/insurance.	
Special ID cards. Special badge. Special uniform. Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required. Restrictions.	
Proficiency test.	

Other information:  
Before commencing business in the state, a security or investigative agency is instructed to check with the local county attorney and sheriff and the local city or town attorney and chief of police to determine whether any county or city licenses and regulations may be applicable to its activities.

REGULATION OF PRIVATE SECURITY BY STATE OF NEBRASKA

Details of regulation	Business or personnel regulated: Private contract detective, guard, patrol, alarm, or armored car business
Regulatory agency -----	Secretary of State.
Method of regulation -----	Licensing of businesses and plainclothes investigative employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience	Experience and competency consonant with public interest and welfare.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of felony or moral turpitude offenses; not of good moral character, temperate habits, good reputation for truth, honesty, and integrity.
Grounds for suspension or revocation -	Violation of law or regulations; improper conduct of principal or employee of the business.
Penalties -----	\$100 to \$500 fine and/or 6 months imprisonment for violation of licensing provisions.
License or registration period -----	Two years.
License fees -----	\$10.
Bond/insurance -----	\$10,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Secretary of State may make and adopt rules and regulations.

REGULATION OF PRIVATE SECURITY BY STATE OF NEVADA

Details of regulation	Business or personnel regulated: Private contract investigation, patrol, process serving, repossessing, or polygraph operator business
Regulatory agency -----	Detective Licensing Board.
Method of regulation -----	Licensing business; registering employees.
Licensing requirements:	
Written examination -----	Yes (and possibly an oral exam).
Length of residency -----	Six months in the state.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Two years experience, unless applying for a private investigator's license, which requires 3 years experience as an investigator or its equivalent.
Educational level -----	SS *.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or crime involving moral turpitude or illegally using, carry- ing, or possessing a dangerous weapon; bad moral character, intemperate habits or bad reputation for truth, honesty and integrity; a license has been refused or revoked; performance of an act that required a license while unlicensed; falsifica- tion of application.
Grounds for suspension or revocation -----	Conviction of a felony or any offense involving moral turpitude; violation of any of the provisions of this law; a false statement by the licensee that any person is or has been in his employ; any unprofessional conduct or unfitness of the licensee or any person in his employ; false information in connection with an application; any act constituting dishonesty or fraud; impersonation of or aiding and abetting an employee in the impersonation of a law enforcement officer; willful failure or refusal to render to a client services or a report as agreed between the parties, for which compensation has been paid or tendered in accordance with the agreement of the parties; any act which is a ground for denial of an application.
Penalties -----	\$500 fine and/or 1 year imprisonment; suspension or revocation of license.
License or registration period -----	One year.
License fees -----	\$75 for license; \$25 for the examination.
Bond/insurance -----	\$10,000 for private investigators and repossessors; \$2,000 for private patrolmen, process servers, and polygraph operators.
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

All unlicensed employees of license holders must be registered with the state within 10 days of hiring. In-house investigators,  
insurance and credit investigators, and collection agencies are exempted from licensing.

REGULATION OF PRIVATE SECURITY BY STATE OF NEW HAMPSHIRE

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements:	
Written examination.	
Length of residency.	
U.S. citizen.	
Age limits.	
Photograph.	
Fingerprints.	
Prior investigative, security, or law enforcement experience.	
Educational level.	
Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period.	
License fees.	
Bond/insurance.	
Special ID cards.	
Special badge.	
Special uniform.	
Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required.	
Restrictions.	
Proficiency test.	
Other information:	
Trade name registration required for every individual, corporation, or partnership doing business in the state under a name other than their own (\$10 fee).	

REGULATION OF PRIVATE SECURITY BY STATE OF NEW JERSEY

Details of regulation	Business or personnel regulated: Private contract investigation, guard, or patrol business
Regulatory agency -----	State Police.
Method of regulation -----	Licensing of business; registering employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 25 years old.
Photograph -----	SS.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Five years.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a high misdemeanor or other specified crimes; bad moral character, intemperate habits, or a bad reputation for truth, honesty, and integrity; knowingly making a false material statement in his application; practicing fraud, deceit, or misrepresentation, including but not limited to (a) knowingly making a false statement or written report relating to evidence or information obtained in the course of employment, (b) manufacture of evidence, (c) acceptance of employment adverse to a client or former client relating to a matter with respect to which the license has obtained confidential information by reason of or in the course of his employment by such client or former client; demonstration of incompetence or untrustworthiness in his licensee's actions; failure to maintain a proper surety bond; failure to meet or continue to meet the requirements for licensure provided by the Act and these rules.
Grounds for suspension or revocation -----	See Grounds for Denial.
Penalties -----	Suspension or revocation.
License or registration period -----	Five years.
License fees -----	\$200 for an individual; \$5,000 for an agency.
Bond/insurance -----	\$3,000 for an individual; \$5,000 for an agency.
Special ID cards -----	Yes, for watchmen, guards, or private patrolmen.
Special badge -----	May not be similar to that of public police.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Pistol permit.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Employees' fingerprints must be sent to the State Police within 48 hours of employment, and a list of employees must be sent annually to the Superintendent of State Police. Employers may not employ anyone convicted of high misdemeanors or certain other specified crimes. Anyone currently employed as a police officer may not be issued a private investigator's license. Insurance and credit investigators, as well as in-house and alarm business security personnel, are exempted from licensing.

REGULATION OF PRIVATE SECURITY BY STATE OF NEW MEXICO  
(page 1 of 3 pages)

Details of regulation	Business or personnel regulated: Private contract investigator
Regulatory agency -----	Department of Justice, Bureau of Private Investigators.
Method of regulation -----	Licensing business; registering employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes (licensee and employees).
Fingerprints -----	Yes, two sets (licensee and employees).
Prior investigative, security, or law enforcement experience -----	Two years investigative experience.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or a crime involving turpitude; illegally using, carrying, or possessing a deadly weapon, or committing any act constituting dishonesty or fraud; a bad moral character, intemperate habits or a bad reputation for truth, honesty, or integrity; operating without a license; making false statements on the application; previous revocation, refusal, or suspension of a license.
Grounds for suspension or revocation -----	Possession of wiretap or bugging devices; violation of any provision of the Act; violation of any rule of the attorney general adopted pursuant to the authority contained in the Act; impersonation of or permitting or aiding and abetting an employee to impersonate a law enforcement officer or employee of the United States of America or of any state or political subdivision thereof; willful failure or refusal to render to a client services or a report as agreed between the parties; commission of assault, battery, or kidnapping, or use of force or violence on any person without proper justification; acting as a runner or capper for an attorney; or commission of any act which is a ground for denial of any application for license under the Act.
Penalties -----	Revocation or suspension.
License or registration period -----	Two years.
License fees -----	\$25 for original license, \$10 for renewal; \$3 employee registration fee; branch office—\$5.
Bond/insurance -----	\$2,000.
Special ID cards -----	Yes (licensee and employees).
Special badge -----	Badge prohibited.
Special uniform -----	Not similar to police uniform.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Act excludes insurance investigators, financial investigators, and debt collection personnel from licensing. Local regulation also allowed. Divulge information only to employer, police, and clients. All employees on payroll more than five days except clerical must be registered within 2 weeks. Must not impersonate police. Regulatory agency may refuse to register or revoke employee registration for same grounds as license denials or revocations. All bond claims and all court proceedings must be reported by both the licensee and the bonding company.

**REGULATION OF PRIVATE SECURITY BY STATE OF NEW MEXICO**  
(page 2 of 3 pages)

Details of regulation	Business or personnel regulated: Private contract guard or patrol business
Regulatory agency -----	Bureau of Private Investigators.
Method of regulation -----	Licensing business; registering employees.
Licensing requirements:	
Written examination -----	SS*.
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes (licensee and employees).
Fingerprints -----	Yes (licensee and employees).
Prior investigative, security, or law enforcement experience -----	One year as guard or patrolman.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for Investigator Business (see page 1).
Grounds for suspension or revocation -----	Same as for Investigator Business.
Penalties -----	Revocation or suspension.
License or registration period -----	Two years.
License fees -----	Same as for investigators.
Bond/insurance -----	\$2,000.
Special ID cards -----	Yes (licensee and employees).
Special badge -----	May be worn only on duty and when in uniform.
Special uniform -----	Uniform not similar to that of public police.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

Same as "Other Information" for Investigator Business (see page 1) except in-house guard forces are exempt from licensing. May carry unconcealed weapons when in uniform on duty.

**REGULATION OF PRIVATE SECURITY BY STATE OF NEW MEXICO**  
(page 3 of 3 pages)

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Board of Examiners in Polygraph.
Method of regulation -----	License personnel.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS*.
U.S. citizen -----	Yes.
Age limits -----	25 years.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	High school graduate.
Criminal record check -----	Yes.
Grounds for denial -----	Not of good moral character; conviction of a crime involving moral turpitude; false statements on application; addicted to drugs or alcoholic; guilty of unprofessional conduct; or incompetent.
Grounds for suspension or revocation -----	See Grounds for Denial.
Penalties -----	Violation of Act is a misdemeanor.
License or registration period -----	One year.
License fees -----	\$100 initial; \$50 renewal.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

REGULATION OF PRIVATE SECURITY BY STATE OF NEW YORK  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract investigator agency
Regulatory agency -----	Division of Licensing Services, Department of State.
Method of regulation -----	Licensing of agency; criminal records check of each employee by the state.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	None.
U.S. citizen -----	Yes.
Age limits -----	Minimum of 25 years old for licensee.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Three years police experience at rank above patrolman; sheriff; U.S. Government investigator; state police; or private investigator.
Educational level -----	SS *.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony, using or carrying dangerous weapon, possession of burglar's tools, receiving stolen property, aiding escape from prison, possession or distribution of dangerous narcotics, jostling, or lewdness; not of good character, competency, or integrity.
Grounds for suspension or revocation -----	Revocation or suspension for rule violations, fraud or deceit, misstatement, incompetence, or untrustworthiness.
Penalties -----	Revocation, suspension, or fine to \$5,000 and/or 1 year imprisonment.
License or registration period -----	Two years.
License fees -----	\$200/individual; \$300/corporation.
Bond/insurance -----	\$10,000.
Special ID cards -----	Yes.
Special badge -----	None allowed.
Special uniform -----	Yes.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

An agency holding an investigation license may perform guard, watch, and patrol services, but not *vice versa*. All employees must be fingerprinted; fingerprints must be sent to the state agency within 24 hours; must not have been convicted of a felony, offense involving moral turpitude or any offenses described above for licensee. Statute does not apply to: businesses who furnish information as to credit standing; personal habits and financial responsibility of insurance applicants; insurance adjuster; or fire or central alarm businesses.

REGULATION OF PRIVATE SECURITY BY STATE OF NEW YORK  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Contract watch, guard, or patrol agency
Regulatory agency -----	Division of Licensing Services, Department of State.
Method of regulation -----	Licensing of agency; criminal records check of each employee by the state.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	None.
U.S. citizen -----	Yes.
Age limits -----	Minimum 25 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Two years with a watch, guard, or patrol agency or public law enforcement agency.
Educational level -----	Yes.
Criminal record check -----	Yes.
Grounds for denial -----	Same as for investigator licensee (see page 1).
Grounds for suspension or revocation -----	Same as for investigator licensee.
Penalties -----	Same as for investigator licensee.
License or registration period -----	Two years.
License fees -----	\$100/individual; \$300/corporation.
Bond/insurance -----	\$10,000.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes.
Training required -----	SS *.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

See "Other Information" for investigators (page 1).

REGULATION OF PRIVATE SECURITY BY STATE OF NORTH CAROLINA  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract detective, guard, or patrol business
Regulatory agency -----	State Bureau of Investigation.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	Yes (may be required).
Length of residency -----	SS <sup>*</sup> .
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Two years relevant private security or 1 year FBI or State Bureau investigator or municipal police experience, or other such qualifications as the Director may fix.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or other crime involving moral turpitude or carrying or possessing a dangerous weapon; commission of an act constituting fraud or dishonesty; license issuance refused under the Act; commission of an act which would have been a violation of the Licensing Act; making false statements on application.
Grounds for suspension or revocation -----	Giving false information in connection with an application; violation of any provision of licensing law or regulations; previous conviction of a felony or any crime involving moral turpitude or any other crime involving the illegal use, carrying or possession of a dangerous weapon; commission of any act constituting dishonesty or fraud; impersonation of a law enforcement officer; willful failure or refusal to render to a client service or a report as agreed between the parties; commission of any other act which is a ground for denial of an application; undertaking to give legal advice or counsel.
Penalties -----	Revocation, suspension, fine, and/or imprisonment (violation of licensing act is a misdemeanor).
License or registration period -----	One year.
License fees -----	\$25.
Bond/insurance -----	\$5,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	No.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>\*</sup> SS means statute is silent.

Other information:

Insurance and credit investigators as well as in-house security personnel are exempt from licensing requirements.

REGULATION OF PRIVATE SECURITY BY STATE OF NORTH CAROLINA  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Company police
Regulatory agency -----	Governor.
Method of regulation -----	Appointment (nonmandatory license).
Licensing requirements:	
Written examination -----	SS <sup>*</sup> .
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	SS.
Penalties -----	SS.
License or registration period -----	SS.
License fees -----	SS.
Bond/insurance -----	\$2,500.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Yes, full police arrest powers while on duty at assigned property or in hot pursuit.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>\*</sup> SS means statute is silent.

Other information:

An appointment is neither necessary nor mandatory to conduct business. Both in-house and contract police personnel may be appointed.

REGULATION OF PRIVATE SECURITY BY STATE OF NORTH DAKOTA

(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract guard, patrol, or detective agency
Regulatory agency -----	Attorney General.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS *.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level.	
Criminal record check -----	Yes.
Grounds for denial -----	Felony conviction; not a person of honesty, truthfulness, and integrity.
Grounds for suspension or revocation -----	Fraud in obtaining license, violation of licensing law; guilty of crime of moral turpitude; betraying professional secrets; failure to maintain bond.
Penalties -----	Suspension or revocation. Also, any person who violates any provision of Act or falsely states or represents his job status shall be guilty of a misdemeanor and fined \$25 to \$500 and/or 6 months imprisonment.
License or registration period -----	One year.
License fees -----	\$50 initially; \$25 for renewal.
Bond/insurance -----	\$2,500.
Special ID cards -----	Yes (to license holders).
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

In-house security personnel, and insurance and credit investigators are exempted from licensing.

REGULATION OF PRIVATE SECURITY BY STATE OF NORTH DAKOTA

(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Attorney General.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	Special examination.
Length of residency -----	Yes.
U.S. citizen -----	Minimum 21 years old.
Age limits -----	
Photograph -----	
Fingerprints -----	
Prior investigative, security, or law enforcement experience -----	
Educational level.	
Criminal record check -----	
Grounds for denial -----	Conviction of felony or crime involving moral turpitude; not having honorable military discharge; not an honest, truthful, and morally fit person of integrity.
Grounds for suspension or revocation -----	Basically the same as for investigators (see page 1), plus demonstrated incompetency, mental capability problem, or failure to provide the Attorney General with information requested as the result of a complaint.
Penalties -----	Suspension or revocation.
License or registration period -----	One year.
License fees -----	\$25 initially; \$10 for renewal.
Bond/insurance -----	SS *.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	Yes.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

May waive examination if licensed in another state.

REGULATION OF PRIVATE SECURITY BY STATE OF OHIO

Details of regulation	Business or personnel regulated: Private contract investigation, guard, or patrol business
Regulatory agency -----	Department of Commerce, Division of Licensing.
Method of regulation -----	Licensing business; registering and approval of employees.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS <sup>a</sup> .
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Two years relevant experience.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of felony or crime involving moral turpitude in last 20 years; mentally defective; not of reputation for integrity.
Grounds for suspension or revocation -----	Violation of licensing provisions; conviction of felony or crime involving moral turpitude; giving false testimony or perjury.
Penalties -----	\$100 to \$1,000 fine and/or 1 year imprisonment.
License or registration period -----	One year.
License fees -----	\$100 license fee; \$5 registration fee for each employee.
Bond/insurance -----	Insurance of \$100,000 per person and \$300,000 per occurrence for personal injury, plus \$100,000 property damage coverage; or bond of \$400,000.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes.
Training required -----	Training is required only if the locality requires the security personnel to obtain a private police commission (different from state license and registration). (Continued in footnote b.)
Legal authority above that of ordinary citizen -----	No.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

<sup>b</sup> Types of security personnel commissioned are determined locally, and commissioned officers typically have no power above normal citizens. The only security personnel for which the state forces mandatory training, not subject to local commissioning, are armed personnel at educational institutions. To be commissioned, employers must pass a 120-hour training program. It must be given at an accredited training school with approved instructors and approved curriculums and must be completed within 12 months of initial employment. The accreditation, curriculum specification, etc., is governed by the (state) Ohio Peace Officers Training Council.

Other information:

Insurance and credit investigators, plus in-house security personnel, are exempted from licensing. Additional licensing and regulation of such activities are conducted by municipalities. Each licensee shall register all security employees with the Department of Commerce within 10 days of employment. Registration application shall include a set of fingerprints, photo, and \$5 registration fee. The employee may not work prior to being issued a registration ID card by the Division of Licensing unless the client being served is so notified.

REGULATION OF PRIVATE SECURITY BY STATE OF OKLAHOMA

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	No state regulatory body.
Method of regulation -----	
Licensing requirements:	
Written examination -----	
Length of residency -----	
U.S. citizen -----	
Age limits -----	
Photograph -----	
Fingerprints -----	
Prior investigative, security, or law enforcement experience -----	
Educational level -----	
Criminal record check -----	
Grounds for denial -----	
Grounds for suspension or revocation -----	
Penalties -----	
License or registration period -----	
License fees -----	
Bond/insurance -----	
Special ID cards -----	
Special badge -----	
Special uniform -----	
Training required -----	
Legal authority above that of ordinary citizen -----	
Handguns: Additional license required -----	
Restrictions -----	
Proficiency test -----	
Other information:	
Any regulation is provided at the city and/or county level.	

REGULATION OF PRIVATE SECURITY BY STATE OF OREGON

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements: Written examination. Length of residency. U.S. citizen. Age limits. Photograph. Fingerprints. Prior investigative, security, or law enforcement experience.	
Educational level. Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period. License fees.	
Bond/insurance.	
Special ID cards. Special badge. Special uniform. Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required. Restrictions.	
Proficiency test.	
Other information: Any regulation is at the county and/or municipal level.	

REGULATION OF PRIVATE SECURITY BY STATE OF PENNSYLVANIA

Details of regulation	Business or personnel regulated: Private contract guard, patrol, and detective business
Regulatory agency -----	None at the state level.
Method of regulation -----	State licensing law administered by County Court of Quarter Sessions; fingerprints of all employees must be submitted for criminal record check.
Licensing requirements: Written examination ----- Length of residency ----- U.S. citizen ----- Age limits ----- Photograph ----- Fingerprints ----- Prior investigative, security, or law enforcement experience -----	SS*. SS. Yes. Minimum 21 years old. Yes. Yes. Three years as investigator (state, federal), or municipal policeman at rank higher than patrolman.
Educational level ----- Criminal record check -----	SS. Yes.
Grounds for denial -----	Conviction of a felony, or any of the following offenses: illegally using, carrying, or possessing a pistol or other dangerous weapon; making or possessing burglar's instruments; buying or receiving stolen property; unlawful entry of a building; aiding escape from prison; unlawfully possessing or distributing habit forming narcotic drugs; picking pockets or attempting to do so; or soliciting any person to commit sodomy or other lewdness.
Grounds for suspension or revocation -----	Violation of licensing law.
Penalties -----	\$500 to \$5,000 fine and/or 1 year imprisonment.
License or registration period ----- License fees -----	Two years. \$200 individual, \$300 for an agency.
Bond/insurance -----	\$10,000.
Special ID cards ----- Special badge ----- Special uniform ----- Training required -----	Yes. Yes. SS. SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required ----- Restrictions -----	SS. SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
All employees must meet background standards provided for license holders. Licensee must file fingerprints of all employees with the County Court. Credit and insurance investigators exempted from licensing. Employers may not employ a known felon and must not falsify employee records. Employee must fill out detailed application, undergo criminal check, and be fingerprinted; all this information is to be filed with the Clerk of the County Court of Quarter Sessions. Falsification of fingerprints carries a \$5,000 fine, imprisonment, or both if convicted.

REGULATION OF PRIVATE SECURITY BY STATE OF RHODE ISLAND

Details of regulation	Business or personnel regulated: Private contract detectives
Regulatory agency -----	Authority delegated to cities.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS *.
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	"For cause."
Penalties -----	\$50 to \$200 fine and/or 6 months imprisonment for operating without a license in localities where required.
License or registration period -----	One year.
License fees -----	\$10.
Bond/insurance -----	\$3,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	No powers to sheriff, deputy, police officers, or constables.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

REGULATION OF PRIVATE SECURITY BY STATE OF SOUTH CAROLINA

Details of regulation	Business or personnel regulated: Private contract detectives and detective agencies
Regulatory agency -----	State Law Enforcement Division.
Method of regulation -----	License agencies and investigative personnel.
Licensing requirements:	
Written examination -----	SS *.
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	Experience as an investigator—correspondence courses do not satisfy requirement.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	Found not to be reputable and competent.
Grounds for suspension or revocation -----	Conducting business in an unsatisfactory manner or violating provision of Licensing Act.
Penalties -----	Maximum of \$200 or 60 days imprisonment for misdemeanor violations of regulations.
License or registration period -----	One year.
License fees -----	\$25.
Bond/insurance -----	\$2,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	No.
Handguns: Additional license required -----	SS.
Restrictions -----	Firearms prohibited.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Detailed requirements for licensing are set by the Chief of the Law Enforcement Division. A private detective's license issued in the name of a firm does not authorize a firm to send an investigator, employed by the firm, unless the investigator is also licensed.

REGULATION OF PRIVATE SECURITY BY STATE OF SOUTH DAKOTA

REGULATION OF PRIVATE SECURITY BY STATE OF TENNESSEE  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements: Written examination. Length of residency. U.S. citizen. Age limits. Photograph. Fingerprints. Prior investigative, security, or law enforcement experience.  Educational level. Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period. License fees.	
Bond/insurance.	
Special ID cards. Special badge. Special uniform. Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required. Restrictions.	
Proficiency test.	

Other information:  
Any regulation and licensing of such activities is provided by counties and/or cities.

Details of regulation	Business or personnel regulated: Contract detective, investigative, or protective agency
Regulatory agency -----	Department of Revenue.
Method of regulation -----	Privilege tax.
Licensing requirements: Written examination ----- Length of residency ----- U.S. citizen ----- Age limits ----- Photograph ----- Fingerprints ----- Prior investigative, security, or law enforcement experience -----  Educational level ----- Criminal record check -----	SS *. SS. SS. SS. SS. SS. SS. SS. SS. SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -	SS.
Penalties -----	SS.
License or registration period ----- License fees -----	One year. \$100 privilege tax.
Bond/insurance -----	SS.
Special ID cards ----- Special badge ----- Special uniform ----- Training required -----	SS. SS. SS. SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required ----- Restrictions -----	SS. SS.
Proficiency test -----	SS.

\* SS means statute is silent.  
Other information:  
Any other regulation is provided by municipalities and/or counties.

REGULATION OF PRIVATE SECURITY BY STATE OF TENNESSEE  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Contract night-watch agency
Regulatory agency -----	Department of Revenue.
Method of regulation -----	Privilege tax.
Licensing requirements:	
Written examination -----	SS <sup>a</sup> .
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	SS.
Penalties -----	SS.
License or registration period -----	One year.
License fees -----	\$25 tax with three or more employees; no charge if less than three employees.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

Other information:  
Any other regulation is provided by municipalities and/or counties.

REGULATION OF PRIVATE SECURITY BY STATE OF TEXAS  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private contract investigator, contract guard, patrol, central alarm, or armored car business
Regulatory agency -----	State Board of Private Detectives, Investigators, Patrolmen, Guards, and Managers.
Method of regulation -----	Licensing businesses; registering investigative employees.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	Must be state citizen.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Three years.
Educational level -----	SS <sup>a</sup> .
Criminal record check -----	Yes (letter from police or sheriff's office attesting to character).
Grounds for denial -----	Commission of any act constituting dishonesty or fraud; commission of any act, which, if committed by a licensee, would be a ground for the suspension or revocation of a license under the Act; commission of any act resulting in conviction of a felony or a crime involving moral turpitude; bad moral character, intemperate habits, or a bad reputation for truth, honesty, and integrity; previous refusal or revocation of a license under the Act; knowingly making any false statements in his application.
Grounds for suspension or revocation -----	Giving false information in connection with an application; violation of any provisions of the Act; conviction of a felony or any crime involving moral turpitude or illegally using, carrying or possessing a dangerous weapon; violation of any rule of the Board; impersonation of a law enforcement officer; willful failure or refusal to render to a client services or a report as agreed; committing any act which is a ground for denial of an application for license; if the licensee or his manager knowingly employed, or has in his employment any person who (1) has committed any act, which, if committed by a licensee, would be grounds for suspension or revocation of a license under the Act, (2) has been convicted of a felony or any crime involving moral turpitude, (Continued in footnote b).
Penalties -----	\$500 fine and/or one year imprisonment for misdemeanor violation of Act. Up to 5 years for falsifying fingerprints or photo in application (felony).
License or registration period -----	One Year.
License fees -----	\$150 to \$225 initially; \$100 to \$175 for renewal.
Bond/insurance -----	\$10,000.
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

<sup>b</sup> (3) has a bad moral character, intemperate habits, or a bad reputation for truth, honesty, and integrity; using any letter-head, advertisement, or other printed matter, or in any manner illegally representing that he is an instrumentality of the federal government, the state, or a political subdivision of either; committing any act in the course of the licensee's business constituting dishonesty or fraud. "Dishonesty or fraud" as used in this connection, includes (1) knowingly making a false statement relating to information obtained in the course of employment, or knowingly publishing a slander or a libel in the course of a business, (2) manufacture of evidence, or (3) acceptance of employment adverse to a client or former client if licensee has obtained confidential information by reason of his employment by such client.

Other information:

Credit and insurance investigators, and in-house security forces are exempted from licensing. Investigative employees must be registered within 2 weeks after initial employment date on application, which will include name, residence, photograph, fingerprints, and local police approval letter. Undercover agents, clerical, and other noninvestigative personnel need not register.

**REGULATION OF PRIVATE SECURITY BY STATE OF TEXAS**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Board of Polygraph Examiners.
Method of regulation -----	License personnel.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS*.
U.S. citizen -----	Yes.
Age limits -----	Minimum, 21 years.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	See Education.
Educational level -----	Bachelor's degree or 5 years investigative experience.
Criminal record check -----	Yes.
Grounds for denial -----	Not a person of honesty, truthfulness, integrity, or moral fitness; conviction of a felony or a crime involving moral turpitude.
Grounds for suspension or revocation -----	Same as Grounds for Denial, plus failure to inform suspect of the nature and voluntariness of the examination; material misstatement on examination; violation of provisions of Licensing Act; misleading advertising; demonstrated unworthiness or incompetency; habitual drunkenness or mental incompetency; or failure to inform subject of results of examination if so requested.
Penalties -----	\$100 to \$1,000 fine or 6 months maximum imprisonment.
License or registration period -----	One Year.
License fees -----	\$60 for examiners; \$30 for interns.
Bond/insurance -----	\$5,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	Twelve months internships, or graduation from an approved polygraph school and six months internship.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required.	
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

Polygraph charts shall be marked to indicate the place on the chart where the question was asked and answered; charts and question sheets shall be retained for at least 2 years.

**REGULATION OF PRIVATE SECURITY BY STATE OF UTAH**

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements:	
Written examination.	
Length of residency.	
U.S. citizen.	
Age limits.	
Photograph.	
Fingerprints.	
Prior investigative, security, or law enforcement experience.	
Educational level.	
Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period.	
License fees.	
Bond/insurance.	
Special ID cards.	
Special badge.	
Special uniform.	
Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required.	
Restrictions.	
Proficiency test.	

**Other information:**

Any regulation is provided at the city and/or county level.

REGULATION OF PRIVATE SECURITY BY STATE OF VERMONT

Details of regulation	Business or personnel regulated: Private contract detective agency
Regulatory agency -----	Secretary of State.
Method of regulation -----	License agency.
Licensing requirements:	
Written examination -----	See "Training".
Length of residency -----	SS <sup>a</sup> .
U.S. citizen -----	SS.
Age limits -----	Minimum 21 years old.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	Certificate from the law enforcement training council that applicant has either completed the basic course of instruction required for law enforcement officers of the state, or satisfactorily completed the examination testing the competency of private detectives.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Applicant does not meet high standards of character, integrity, and reputation; applicant does not furnish sufficient information.
Grounds for suspension or revocation -----	"Just cause" must be shown at a public hearing.
Penalties -----	\$1,000 fine and/or 1 year imprisonment for misdemeanor misconduct; \$500 fine and/or 5 months imprisonment for operating without a license.
License or registration period -----	One year.
License fees -----	\$100.
Bond/insurance -----	\$25,000.
Special ID cards -----	Yes, for owners and employees.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	Completion of basic law enforcement training program in state or satisfactory completion of an examination to test competency.
Legal authority above that of ordinary citizen.	
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>a</sup> SS means statute is silent.

Other information:

License holder is responsible for all actions of employees. Credit and in-house investigators are exempt from licensing.

REGULATION OF PRIVATE SECURITY BY STATE OF VIRGINIA  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Special police
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements:	
Written examination.	
Length of residency.	
U.S. citizen.	
Age limits.	
Photograph.	
Fingerprints.	
Prior investigative, security, or law enforcement experience.	
Educational level.	
Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period.	
License fees.	
Bond/insurance.	
Special ID cards.	
Special badge.	
Special uniform.	
Training required.	
Legal authority above that of ordinary citizen -----	Yes (see Other Information, below).
Handguns: Additional license required.	
Restrictions -----	At discretion of localities.
Proficiency test.	

<sup>a</sup> SS means statute is silent.

Other information:

County, city or town circuit, or corporation judge may appoint Conservators of the Peace at designated locations, e.g., university, college, penal or correction institutions, state hospital, or places where there are large gatherings of people. Regulation of special police and other categories of investigative and security personnel is at the city and/or county level.

**REGULATION OF PRIVATE SECURITY BY STATE OF VIRGINIA**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Polygraph examiner
Regulatory agency -----	Department of Professional and Occupational Registration.
Method of regulation -----	Licensing personnel.
Licensing requirements:	
Written examination -----	SS *.
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum, 21 years.
Photograph -----	SS.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	High school graduate.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a misdemeanor involving moral turpitude, or of a felony; material misstatement on application.
Grounds for suspension or revocation -----	Same as Grounds for Denial, plus willful disregard for or violation of Act; misleading or false advertising; mental illness or deficiency.
Penalties -----	\$100 to \$500 fine and/or 12 months maximum imprisonment.
License or registration period -----	One year.
License fees -----	\$30 initial; \$25 renewal.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	Completion of at least 180 hours of polygraph instruction at an approved polygraph school.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required. Restrictions -----	SS.
Proficiency test -----	SS.

\* SS mean, statute is silent.

**REGULATION OF PRIVATE SECURITY BY STATE OF WASHINGTON**

Details of regulation	Business or personnel regulated: None
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements:	
Written examination.	
Length of residency.	
U.S. citizen.	
Age limits.	
Photograph.	
Fingerprints.	
Prior investigative, security, or law enforcement experience	
Educational level.	
Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period.	
License fees.	
Bond/insurance.	
Special ID cards.	
Special badge.	
Special uniform.	
Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required. Restrictions.	
Proficiency test.	
Other information:	
Any regulation is provided at the city and/or county level.	

REGULATION OF PRIVATE SECURITY BY STATE OF WEST VIRGINIA

Details of regulation	Business or personnel regulated: Private contract detective, guard, or patrol agency
Regulatory agency -----	Secretary of State.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Three years of experience or one year of relevant training at an accredited college or university or licensed private detective agency.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or: illegally possessing or using a pistol or dangerous weapon; making or possessing burglar tools; buying or receiving stolen property; unlawful entry into a building; possessing or distributing habit forming drugs; moral turpitude (the conviction need not result in denial if the parole board has granted a certificate of good conduct).
Grounds for suspension or revocation -----	See "Grounds for Denial".
Penalties -----	\$100 to \$1,000 fine for practicing without a license or violation of regulations.
License or registration period -----	One Year.
License fees -----	\$50 for an individual; \$100 for an agency; \$500 for a nonresident individual or corporation.
Bond/insurance -----	\$2,500.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	See "Experience".
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Regulation does not apply to central station burglary or fire alarm services, in-house security personnel, collection agencies doing investigative work, nor to retail credit and insurance investigators.

REGULATION OF PRIVATE SECURITY BY STATE OF WISCONSIN

Details of regulation	Business or personnel regulated: Private contract detective, guard, or patrol agency
Regulatory agency -----	Department of Licensing and Regulation.
Method of regulation -----	License agency; license investigative employees; local registration of guards (see Other Information, below).
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	One year.
U.S. citizen -----	Yes.
Age limits -----	25 years old for business principal; 21 years for individual agent.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS (requirements may be established by administrative rule).
Educational level -----	SS (requirements may be established by administrative rule).
Criminal record check -----	Yes.
Grounds for denial -----	Felony conviction in last 5 years; not of good character, competence, or integrity. Other requirements set by administrative rule.
Grounds for suspension or revocation -----	Petition presented to regulatory agency signed by six citizens (requires a hearing); commitment of a felony; misrepresentation on application; or conduct reflecting adversely on the individual's professional qualifications.
Penalties -----	Misdemeanor: \$100 to \$500 fine and/or 3- to 6-months imprisonment for conducting business without a license.
License or registration period -----	One year.
License fees -----	\$200 for agency; \$2 for individual employee.
Bond/insurance -----	\$10,000 for agency; \$2,000 for individual.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Yes, for concealed weapons.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

In-house security forces and credit and insurance investigators are exempted from licensing and registration. All aspects of the law apply to the employees of the agency, except that an employee of any licensed agency supplying uniformed security employees to patrol exclusively on the private property of industrial plants, business establishments, schools, hospitals, exhibits, and similar activities shall be exempt from the license requirement if such employee obtains a watchman and guard permit. Such permits may be issued by municipalities if the employee has not been convicted of a felony in the last five years. The locality must issue or deny the permit within 48 hours of application.

REGULATION OF PRIVATE SECURITY BY STATE OF WYOMING

Details of regulation	Business or personnel regulated: Private detectives
Regulatory agency -----	None at the state level.
Method of regulation.	
Licensing requirements: Written examination. Length of residency. U.S. citizen. Age limits. Photograph. Fingerprints. Prior investigative, security, or law enforcement experience.  Educational level. Criminal record check.	
Grounds for denial.	
Grounds for suspension or revocation.	
Penalties.	
License or registration period. License fees.	
Bond/insurance.	
Special ID cards. Special badge. Special uniform. Training required.	
Legal authority above that of ordinary citizen.	
Handguns: Additional license required ----- Restrictions -----	Concealed weapon permit required. Carry when required by work.
Proficiency test -----	SS *

\* SS means statute is silent.

Other information:  
Any regulation is at the city and/or county level.

APPENDIX B: Summary of Private Security Regulation in Selected Localities

REGULATION OF PRIVATE SECURITY BY BIRMINGHAM, ALA.

(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Private policeman
Regulatory agency -----	Police Department.
Method of regulation -----	Commissioning by Mayor
Licensing requirements: Written examination ----- Length of residency ----- U.S. citizen ----- Age limits ----- Photograph ----- Fingerprints ----- Prior investigative, security, or law enforcement experience -----  Educational level ----- Criminal record check -----	SS *. SS. SS. SS. SS. SS. SS. SS. SS. SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	SS.
Penalties -----	SS.
License or registration period ----- License fees -----	SS. SS.
Bond/insurance -----	\$2,000.
Special ID cards ----- Special badge ----- Special uniform ----- Training required -----	SS. Yes, furnished by city police. SS. SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required ----- Restrictions -----	SS. SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Private policemen are subject to the orders of the police chief and governed by the rules of the police department.

**REGULATION OF PRIVATE SECURITY BY BIRMINGHAM, ALA.**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Contract detective agency
Regulatory agency -----	Police Department.
Method of regulation -----	Licensing of agency and each nonclerical employee.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS <sup>*</sup> .
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level.	
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of crime involving moral turpitude; misrepresentation on application; or not honest, of sober habits, or good moral character.
Grounds for suspension or revocation -----	SS.
Penalties -----	SS.
License or registration period.	
License fees -----	\$5 owner; \$3 employee.
Bond/insurance -----	\$2,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**REGULATION OF PRIVATE SECURITY BY TUCSON, ARIZ.**

Details of regulation	Business or personnel regulated: Contract detective, patrol, or guard agency
Regulatory agency -----	Police Department.
Method of regulation -----	Licensing of agency.
Licensing requirements:	
Written examination -----	SS <sup>*</sup> .
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If convicted of a felony or offenses against community morals or decency; not of good moral character.
Grounds for suspension or revocation -----	Violation of regulations; failure to maintain bond.
Penalties -----	\$300 fine and/or 6 months imprisonment.
License or registration period -----	One year.
License fees -----	Fee required.
Bond/insurance -----	\$2,500.
Special ID cards -----	Must not look like peace officers.
Special badge -----	Must not look like peace officers.
Special uniform -----	Must not look like peace officers.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	May be required.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Central station alarm and armored transport agencies are included.

**REGULATION OF PRIVATE SECURITY BY LOS ANGELES, CALIF.**  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Contract patrol agency
Regulatory agency -----	Board of Police Commissioners.
Method of regulation -----	Licensing of agency and employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony; drug addiction; not having an honorable military discharge; making a false statement on the application; arrests if released on a technicality; serious complaints when previously commissioned; or "not a fit and proper" applicant.
Grounds for suspension or revocation -----	"Not fit and proper to hold a license;" conduct not conducive to public welfare; or violation of any of the rules set by the Board. Temporary suspensions can be made pending investigation of a complaint.
Penalties -----	\$500 fine and/or 6 months imprisonment.
License or registration period -----	SS.
License fees -----	SS.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	\$2 fee for badge issued; must be worn on duty.
Special uniform -----	Yes, not like that of public police.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Concealed weapons can be carried if authorized.
Restrictions -----	Firearm must be inspected by the police.
Proficiency test -----	Yes.

\* SS means statute is silent.

**Other information:**

Batons and firearms are the only weapons allowed; must report each discharge of a firearm to the police. May work only at locations or areas specified by permit (only two patrol agencies are allowed to operate in each geographic area). Must not use a car marked like those of the public police.

**REGULATION OF PRIVATE SECURITY BY LOS ANGELES, CALIF.**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Alarm business
Regulatory agency -----	Police Commission.
Method of regulation -----	Licensing of business and employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	Failure to go to the scene of an alarm within one hour at request of the police; failure to possess identification card; and violation of the regulations.
Penalties -----	Suspension or revocation.
License or registration period -----	SS.
License fees -----	SS.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

Must post the name of the repairman on call 24 hours a day at each alarmed location; must proceed to the scene within one hour at police request; must instruct subscribers on factors causing false alarms; may not connect automatic calling devices directly from the alarm to the public police without permission; no alarm may sound like a siren; and must inspect every alarm at least once per year.

REGULATION OF PRIVATE SECURITY BY OAKLAND, CALIF.  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Contract guard or patrol agency; in-house guard force
Regulatory agency -----	City Manager.
Method of regulation -----	Licensing of contract agency, contract employees, and uniformed or armed in-house employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If convicted of a felony or crime involving moral turpitude in last 5 years; not of good character, integrity, honesty, or sobriety; or not able to read, write, or speak English.
Grounds for suspension or revocation -----	For cause; for any of the grounds for denial; or for not rendering competent or efficient service.
Penalties -----	SS.
License or registration period -----	SS.
License fees -----	\$5.
Bond/insurance -----	\$2,000 for individuals; \$25,000 for corporations.
Special ID cards -----	Yes.
Special badge -----	Yes, must be approved.
Special uniform -----	Yes, must be approved.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
Must have person on duty at place of business between 6 p.m. and 4 a.m.; must submit, quarterly, names, addresses, and telephone numbers of all companies serviced.

REGULATION OF PRIVATE SECURITY BY OAKLAND, CALIF.  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Alarm agency
Regulatory agency -----	City Police.
Method of regulation -----	Licensing of agency and employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Yes.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If convicted of a felony or certain specified misdemeanors within the past 5 years.
Grounds for suspension or revocation -----	Violation of regulations; good cause; or any of the grounds for denial.
Penalties -----	SS.
License or registration period -----	SS.
License fees -----	SS.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Alarms may not be similar to sirens. Clients shall be instructed in operation of the alarm and avoidance of false alarms. Name of the serviceman on 24-hour call must be posted outside at location of alarm; serviceman must proceed to scene at request of the police. Permission must be obtained to connect an alarm directly to police headquarters.

REGULATION OF PRIVATE SECURITY BY SAN JOSE, CALIF.

Details of regulation	Business or personnel regulated: Contract patrol agency
Regulatory agency -----	City Manager.
Method of regulation -----	Licensing of agency; registering of employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If applicant is not "fit and proper".
Grounds for suspension or revocation -----	SS.
Penalties -----	SS.
License or registration period -----	One year.
License fees -----	SS.
Bond/insurance -----	\$1,000 bond and \$10,000/\$20,000 insurance on each patrol car.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	Yes, must be approved style.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:  
City Manager investigates to determine whether or not such additional patrol service is needed in an area.

REGULATION OF PRIVATE SECURITY BY DENVER, COLO.

Details of regulation	Business or personnel regulated: Contract guard and patrol agencies, in-house guard forces, armored transport and alarm agencies
Regulatory agency -----	Manager of Safety and Excise.
Method of regulation -----	Licensing of contract agencies and employees; licensing of in-house employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony, misdemeanor, or violation of municipal ordinance pertaining to moral turpitude in previous 10 years; character and reputation not satisfactory; or record of drug addiction, poor physical or unstable mental condition.
Grounds for suspension or revocation -----	Violation of any federal or state statute, city ordinances, or any provisions of the Act..
Penalties -----	
License or registration period -----	One year.
License fees -----	\$10 per employee; \$10 to \$100 per contract agency.
Bond/insurance -----	\$5,000.
Special ID cards -----	Yes.
Special badge -----	Yes.
Special uniform -----	Yes.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Gun must be specifically authorized by the Manager of Safety and Excise. Carry only on duty or on way to or from work.
Restrictions -----	
Proficiency test -----	Yes.

\* SS means statute is silent.

Other information:

It is unlawful to: arrest a citizen except when the citizen has committed a crime before the eyes of the guard or patrolman; to turn over the arrested person immediately to the Denver police; represent self as a member of the Denver police; and to report a crime. The City Manager may issue regulations pertaining to the duties and conduct of licensees.

**REGULATION OF PRIVATE SECURITY BY MIAMI, FLA.**  
(page 1 of 3 pages)

Details of regulation	Business or personnel regulated: Special police
Regulatory agency -----	City Police.
Method of regulation -----	Licensing.
Licensing requirements:	
Written examination -----	Yes.
Length of residency -----	SS <sup>*</sup> .
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If applicant is undeserving of power and authority, has falsified his application, or has been convicted of a felony.
Grounds for suspension or revocation -----	SS.
Penalties -----	\$500 fine and/or 2 months imprisonment for wearing a uniform similar to that of public police.
License or registration period -----	One year.
License fees -----	\$5.
Bond/insurance -----	\$1,000 bond or \$200,000 insurance.
Special ID cards -----	Yes.
Special badge -----	Not similar to that of public police.
Special uniform -----	Not similar to that of public police.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Yes, same as that of public police except no traffic arrests may be made.
Handguns: Additional license required -----	Yes, \$1,000 bond also required.
Restrictions -----	Must report each discharge of a firearm.
Proficiency test -----	Yes.

<sup>\*</sup> SS means statute is silent.

**Other information:**

Applicants receive detailed study curriculum. Chemical weapons prohibited.

**REGULATION OF PRIVATE SECURITY BY MIAMI, FLA.**  
(page 2 of 3 pages)

Details of regulation	Business or personnel regulated: Contract detective agency
Regulatory agency -----	City Police.
Method of regulation -----	Licensing of agency.
Licensing requirements:	
Written examination -----	SS <sup>*</sup> .
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or crime involving moral turpitude.
Grounds for suspension or revocation -----	SS.
Penalties -----	SS.
License or registration period -----	SS.
License fees -----	SS.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	Not similar to that of public police.
Special uniform -----	Not similar to that of public police.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

<sup>\*</sup> SS means statute is silent.

**REGULATION OF PRIVATE SECURITY BY MIAMI, FLA.**  
(page 3 of 3 pages)

Details of regulation	Business or personnel regulated: Contract guard and patrol agency
Regulatory agency -----	City Police.
Method of regulation -----	Licensing of agency; registration of employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or crime involving moral turpitude.
Grounds for suspension or revocation -----	SS.
Penalties -----	\$500 fine and/or 2 months imprisonment for wearing uniform similar to that of public police.
License or registration period -----	SS.
License fees -----	\$47 or more per employer; \$4 per employee.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	Not similar to that of public police.
Special uniform -----	Not similar to that of public police.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**REGULATION OF PRIVATE SECURITY BY BALTIMORE, MD.**

Details of regulation	Business or personnel regulated: Special police
Regulatory agency -----	Police Department.
Method of regulation -----	Appointment.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If appointment is not in the best interest of public safety; or if applicant is not of suitable character or experience.
Grounds for suspension or revocation -----	Same as Grounds for Denial.
Penalties -----	SS.
License or registration period -----	SS.
License fees -----	\$25 initial; \$10 renewal.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	Issued by police (\$5 fee).
Special uniform -----	Distinctive from that of local police.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Same as public police officer on assigned premises only.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Special police may not be an employee of a contract security agency.

REGULATION OF PRIVATE SECURITY BY KANSAS CITY, MO.

Details of regulation	Business or personnel regulated: Contract guard, patrol, and investigation agencies
Regulatory agency -----	Police Commission.
Method of regulation -----	Licensing of employees and agency.
Licensing requirements:	
Written examination -----	SS <sup>*</sup> .
Length of residency -----	One year in the state.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Two years investigative experience for investigators only.
Educational level -----	High school, for investigators only.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or charge of moral turpitude; not of good moral character.
Grounds for suspension or revocation -----	Violation of regulations.
Penalties -----	Up to \$1,000 fine and/or 2 years imprisonment for firearms law violation.
License or registration period -----	One year.
License fees -----	\$22.
Bond/insurance -----	\$10,000.
Special ID cards -----	Yes, supplied by city.
Special badge -----	Yes, supplied by city.
Special uniform -----	Yes, not similar to those of the police department.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Yes, but only on the private property to which they have been assigned, or in "hot pursuit."
Handguns: Additional license required -----	Yes.
Restrictions -----	May carry loaded firearm only when on duty; concealed weapons prohibited, must file report each time firearm discharged.
Proficiency test -----	Yes.

\* SS means statute is silent.

Other information:

In-house employees are exempt from the licensing requirement. Thirty-day temporary commission may be given if the applicant's fingerprints clear the police department so that he can work while awaiting his final clearance. A person may be employed for more than one company in the same capacity but must have a commission card for each company.

REGULATION OF PRIVATE SECURITY BY ST. LOUIS, MO.  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Contract investigative agency
Regulatory agency -----	Board of Police Commissioners.
Method of regulation -----	Licensing of agency.
Licensing requirements:	
Written examination -----	SS <sup>*</sup> .
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	Three years as state or federal investigator, sheriff, or municipal police officer at a rank higher than patrolman.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If applicant is not of good character, competency, or integrity.
Grounds for suspension or revocation -----	If licensee has knowingly violated any of the provisions of the licensing law; know- ingly instructed any employee to violate any of the provisions of the law; know- ingly made a false report; divulged any unauthorized information which he acquired from or for his client; permitted any employee to make a false report; or accepted money or gratuities from any person whose affairs he has been em- ployed by another person to investigate.
Penalties -----	It is a misdemeanor to violate the Licensing Act.
License or registration period -----	One year.
License fees -----	\$35 to \$300 for agency.
Bond/insurance -----	\$2,000 to \$5,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Licensee is accountable for the good conduct of his employees, who need not be licensed.

**REGULATION OF PRIVATE SECURITY BY ST. LOUIS, MO.**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Contract and in-house guards, patrolmen, alarm, and armored transport personnel
Regulatory agency -----	Board of Police Commissioners.
Method of regulation -----	Licensing of personnel; licensing of contract agencies.
Licensing requirements:	
Written examination -----	SS <sup>a</sup> .
Length of residency -----	State resident.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	Read and write English.
Criminal record check -----	Yes.
Grounds for denial -----	If applicant is not of good moral character; has been convicted of a felony or offense related to moral turpitude; has an unfavorable employment or military record; or has misrepresented facts on his license application.
Grounds for suspension or revocation -----	Conviction of any felony, misdemeanor, or certain other specified offenses; drinking intoxicants on duty; assumption of any police powers when not on duty; conduct detrimental to the public peace or welfare; interference with any police officer; overbearing or oppressive conduct in the discharge of his duties; failure to obey a reasonable order by an officer of the St. Louis Metropolitan Police Department; any conduct or actions which might jeopardize the reputation or integrity of the St. Louis Police Department; carrying a loaded firearm between his place of residence and his licensed area; failure to wear the badge, cap piece, and have in his possession a valid identification card while in uniform; or failure to have in his possession his badge and identification card when working in civilian attire.
Penalties -----	SS.
License or registration period -----	One year.
License fees -----	\$12.50 or higher for contract agencies (depending on gross receipts); other fees determined by the Board of Police Commissioners.
Bond/insurance -----	SS.
Special ID cards -----	Yes, must always be carried while on duty.
Special badge -----	Yes, issued upon satisfactory completion of training.
Special uniform -----	Yes, not similar to that of public police; those exempted from wearing uniform must always carry the letter granting this.
Training required -----	Yes, special course of instruction offered twice per month <sup>b</sup> .
Legal authority above that of ordinary citizen -----	May exercise full public police powers in the area designated to be under their jurisdiction.
Handguns: Additional license required -----	No, but those who are not to carry arms have ID marked as such.
Restrictions -----	Carry only while on duty; firearms inspected by public police; discharge of weapon must be reported to the public police.
Proficiency test -----	Yes.

<sup>a</sup> SS means statute is silent.

<sup>b</sup> At the St. Louis Police Training Academy courses will be conducted for three days (one day devoted to firearms). Training will include: rules and regulations governing watchmen; an introduction to criminal law; arrest, search, and seizure rules; ramifications of recent court decisions on criminal arrest; court and warrant office procedures; crime scene investigations; firearm instruction; plant and store protection techniques; and first aid.

**Other information:**

A person may not be licensed as a private detective and a private watchman at the same time. If an applicant appears to meet the qualifications for licensing, the Commissioner may issue a temporary license permitting the applicant to work, unarmed, but the applicant may not exercise powers of arrest while the temporary license is being used.

**REGULATION OF PRIVATE SECURITY BY ST. LOUIS COUNTY, MO.**

Details of regulation	Business or personnel regulated: Contract and in-house guards, patrolmen, and investigators
Regulatory agency -----	County Superintendent of Police.
Method of regulation -----	Licensing of personnel employed in unincorporated areas of the county.
Licensing requirements:	
Written examination -----	SS <sup>a</sup> .
Length of residency -----	Must be state resident.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	SS.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	Yes.
Educational level -----	Must be literate.
Criminal record check -----	Yes.
Grounds for denial -----	Conviction of a felony or offense involving moral turpitude, or confinement in a penal institution; falsified application; employed presently as a law enforcement officer; or not of good moral character.
Grounds for suspension or revocation -----	Noncompliance with licensing regulations; conduct unbecoming; or conviction of a felony or other specified crime.
Penalties -----	Suspension or revocation.
License or registration period -----	One year.
License fees -----	\$10.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	Yes, issued by police (\$10 fee).
Special uniform -----	Yes, not like that of local police.
Training required -----	Minimum 5 hours training for guards and patrolmen, including 2 hours on firearms. Training to be conducted by public police.
Legal authority above that of ordinary citizen -----	"May exercise police powers," which are the same as local police powers, only while on duty at specified locations.
Handguns: Additional license required -----	Weapons must be registered.
Restrictions -----	Weapons must pass inspection and may be carried only while on duty or on the way to or from work.
Proficiency test -----	Yes.

<sup>a</sup> SS means statute is silent.

**Other information:**  
Each discharge of a firearm must be reported to the police. Detention for questioning, or arrest of any licensee must be reported to the county police within 24 hours.

REGULATION OF PRIVATE SECURITY BY NEWARK, N.J.

Details of regulation	Business or personnel regulated: Special policemen
Regulatory agency -----	Police Department.
Method of regulation -----	Appointment.
Licensing requirements:	
Written examination -----	SS*.
Length of residency -----	One year in Newark.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	Literate.
Criminal record check -----	Yes.
Grounds for denial -----	If convicted of any crime; not of good moral character; addicted to drugs, alcohol, or other bad habits; or not of strong mental or physical health, energy, or courage.
Grounds for suspension or revocation -----	No cause or hearing needed.
Penalties -----	Revocation of appointment.
License or registration period -----	One year.
License fees -----	\$5 first year; \$3 renewal.
Bond/insurance -----	\$100,000/\$300,000 insurance.
Special ID cards -----	Yes.
Special badge -----	Yes (\$10 fee).
Special uniform -----	Yes.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Yes.
Handguns: Additional license required -----	SS.
Restrictions -----	Carry only when on duty or on way to or from work.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Special policemen are subject to orders of the public police.

REGULATION OF PRIVATE SECURITY BY NEW YORK CITY, N.Y.

Details of regulation	Business or personnel regulated: Special police
Regulatory agency -----	City Police Department.
Method of regulation -----	Licensing of personnel.
Licensing requirements:	
Written examination -----	SS*.
Length of residency -----	One year in New York City.
U.S. citizen -----	Yes.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience -----	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	SS.
Grounds for suspension or revocation -----	May be revoked without giving cause; also, for noncompliance with any regulation or aspect of the law.
Penalties -----	Revocation; \$100 fine and/or 60 days imprisonment.
License or registration period -----	SS.
License fees -----	\$10.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	Yes, provided by the NYC police.
Special uniform -----	Yes, of different color than that of the NYC Police Department.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	Yes, same arrest powers as public police while on duty.
Handguns: Additional license required -----	Yes, must write letter to precinct commander stating why gun needed; commander may disapprove.
Restrictions -----	Carry only while on duty.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Special police are subject to public police order; they must report monthly, giving proof of employment; they may not wear uniform off duty.

REGULATION OF PRIVATE SECURITY BY CLEVELAND, OHIO

Details of regulation	Business or personnel regulated: Special police
Regulatory agency -----	Director of Public Safety.
Method of regulation -----	Licensing of personnel.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience.	SS.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -	Just complaint; violation of regulations.
Penalties -----	Revocation of license.
License or registration period -----	SS.
License fees -----	SS.
Bond/insurance -----	\$1,000, if armed with a firearm that may be concealed.
Special ID cards -----	Yes.
Special badge -----	Yes, if approved.
Special uniform -----	Yes, if approved.
Training required -----	120 hours of a training program approved by the Ohio Peace Officers Training Council.
Legal authority above that of ordinary citizen -----	Yes, at specified locations.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Private policemen are responsible for the full enforcement of all laws; are subject to the orders of the chief of police and to regulations set by the Director of Public Safety; must aid public police in distress; and must report all crimes.

REGULATION OF PRIVATE SECURITY BY OKLAHOMA CITY, OKLA.

Details of regulation	Business or personnel regulated: Contract guard or patrol agency
Regulatory agency -----	Police Department.
Method of regulation -----	Licensing of agency and armed employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	Yes.
Age limits -----	Minimum 21 years old.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If convicted of a felony or an offense involving moral turpitude; drug addiction.
Grounds for suspension or revocation -	Violation of any provision of this act, or any of the grounds for denial.
Penalties -----	SS.
License or registration period -----	One year.
License fees -----	\$50 annually for the agency; \$10 per individual employee.
Bond/insurance -----	\$10,000 for each employee or \$100,000 for the agency (may be bond or insurance).
Special ID cards -----	Commission card must be carried.
Special badge -----	Yes, not like that of public police.
Special uniform -----	Yes, not like that of public police.
Training required -----	Must attend orientation classes conducted by public police.
Legal authority above that of ordinary citizen -----	No.
Handguns: Additional license required -----	Yes.
Restrictions -----	SS.
Proficiency test -----	Yes.

\* SS means statute is silent.

Other information:

Police must approve change in patrol area; agency must notify police of client additions before beginning service; failure of applicants to control employees results in revocation of license; before issuance of the license, the applicant must have a personal interview with the public police; temporary permit may be issued provided just cause is shown.

**REGULATION OF PRIVATE SECURITY BY DALLAS, TEX.**  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Contract patrol agency
Regulatory agency -----	City Police.
Method of regulation -----	Licensing of agency and employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	Minimum 21 years old.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience.	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If applicant has been convicted of a felony; made false statement on the application; is not of good moral character; or has had prior unsatisfactory employment in a similar position.
Grounds for suspension or revocation -----	Same as Grounds for Denial.
Penalties -----	\$200 fine.
License or registration period -----	
License fees -----	\$50 for agency; \$10 for each employee.
Bond/insurance -----	SS.
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	Yes, must be approved by police.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	May only carry handgun while on duty at special premises, or on way to or from work.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

City police must make recommendation on an application within 10 days. Patrol agency must file written report on each arrest. In-house guards are not required to be licensed.

**REGULATION OF PRIVATE SECURITY BY DALLAS, TEX.**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Alarm businesses
Regulatory agency -----	Department of Public Utilities, Police Department.
Method of regulation -----	Licensing of central station alarm companies, businesses that relay alarm messages, and businesses that install prerecorded alarm message devices.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience.	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If convicted of felony; failure to correct deficiencies in equipment; fraud; misrepresentation on application; or violation of provisions of the regulations.
Grounds for suspension or revocation -----	Same as Grounds for Denial.
Penalties -----	\$200 fine for each day following the third day after notice of violation of a provision of the statute is given.
License or registration period -----	One year.
License fees -----	\$25 to \$500.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

Very extensive and detailed regulations have been established. Prerecorded alarm messages may not be transmitted to regular police emergency telephone numbers but may be transmitted to special police emergency telephone numbers; only licensed businesses may install prerecorded alarm message equipment; locations of alarms and service representatives may be furnished every 3 months for certain classes of alarms; prerecorded messages must be of approved format, not over 15 seconds long, and may be transmitted to the police only three times; overly sensitive or errorprone alarms must not be used; devices must be in good repair; alarm clients must receive alarm instructions approved by the police; alarm service man must be available 24 hours a day; police may require certain unacceptable alarm devices to be disconnected; police may inspect alarm installations; central station protective system must comply with National Fire Protection Standard 71-1970 and Underwriters Laboratory Standard NL 611-1968; certain alarm data must be furnished to the police on request; locations where alarms are monitored must be approved, locked, and staffed 24 hours per day; certain alarms shall be tested every 60 days; and clients shall be notified whenever an alarm is out of service.

**REGULATION OF PRIVATE SECURITY BY KING COUNTY, WASH.**  
(page 1 of 2 pages)

Details of regulation	Business or personnel regulated: Contract investigative agency
Regulatory agency -----	County Director of Licensing.
Method of regulation -----	Licensing of agencies and employees in unincorporated areas of the county.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience.	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Felony, conviction within 10 years.
Grounds for suspension or revocation -----	Conviction of a felony, crime of moral turpitude, or an intent to defraud; falsified application.
Penalties -----	\$300 fine and/or 90 days imprisonment.
License or registration period -----	One year.
License fees -----	\$100 annually per agency; \$5 for each employee.
Bond/insurance -----	\$3,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

**Other information:**

Licensee may not disclose confidential information. Credit bureaus, investigators, and insurance adjusters are exempted from licensing.

**REGULATION OF PRIVATE SECURITY BY KING COUNTY, WASH.**  
(page 2 of 2 pages)

Details of regulation	Business or personnel regulated: Contract guard or patrol agency
Regulatory agency -----	County Director of Licensing.
Method of regulation -----	Licensing of agencies and employees in unincorporated areas of the county.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience.	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Felony conviction within 10 years.
Grounds for suspension or revocation -----	Conviction of a felony, crime of moral turpitude, or an intent to defraud; falsified application.
Penalties -----	\$300 fine and/or 90 days imprisonment.
License or registration period -----	One year.
License fees -----	\$35 to \$100 per agency; \$10 per employee.
Bond/insurance -----	\$2,000.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

REGULATION OF PRIVATE SECURITY BY SEATTLE, WASH.

Details of regulation	Business or personnel regulated: Contract guard, patrol, or investigative agency
Regulatory agency -----	City Comptroller.
Method of regulation -----	Licensing of agency and employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience.	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	Engaging in security business without a license; not of good moral character; conviction of a felony within 10 years of application, or of a misdemeanor involving moral turpitude, or of intent to defraud, or having been released from a penal institute or from active supervision on parole as a result of such conviction. However, the city council may waive 5 years of such a period upon the applicant's satisfactorily showing rehabilitation.
Grounds for suspension or revocation -----	See Grounds for Denial.
Penalties -----	\$300 fine and/or 90 days in city jail.
License or registration period -----	One year.
License fees -----	\$250 initial investigative agency fee (\$100 renewal), \$25 to \$100 patrol agency fee; \$5 per employee.
Bond/insurance -----	\$2,000.
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Other information:

Licensee may not release confidential information to unauthorized persons. Credit and insurance investigators are exempted from the licensing requirement. The City Comptroller, upon recommendation of the Chief of Police, pending completion of the entire investigation, may issue a temporary permit to anyone who has been a resident of the State of Washington for 5 years (permit is valid for 45 days).

REGULATION OF PRIVATE SECURITY BY WASHINGTON, D.C.

(page 1 of 2 pages)

Details of Regulation	Business or personnel regulated: Contract guard, patrol, and investigative agency
Regulatory agency -----	Office of Licenses and Police Department.
Method of regulation -----	Licensing of agency and employees.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	Residency required.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	Yes.
Fingerprints -----	Yes.
Prior investigative, security, or law enforcement experience.	SS.
Educational level -----	SS.
Criminal record check -----	Yes.
Grounds for denial -----	If not of moral character; falsification of application; conviction of certain crimes; or violation of any regulation.
Grounds for suspension or revocation -----	Failure to supply the Commissioner with information he needs to determine if business is being operated properly; or any of the grounds for denial.
Penalties -----	\$300 fine and/or 90 days imprisonment.
License or registration period -----	One year.
License fees -----	SS.
Bond/insurance -----	\$5,000.
Special ID cards -----	Yes.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	Must be commissioned as special police officer to carry a firearm.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

Details of Regulation	Business or personnel regulated: Special police
Regulatory agency -----	Commissioner of District of Columbia.
Method of regulation -----	Appointment.
Licensing requirements:	
Written examination -----	SS *
Length of residency -----	SS.
U.S. citizen -----	SS.
Age limits -----	SS.
Photograph -----	SS.
Fingerprints -----	SS.
Prior investigative, security, or law enforcement experience.	SS.
Educational level -----	SS.
Criminal record check -----	SS.
Grounds for denial -----	SS.
Grounds for suspension or revocation -	SS.
Penalties -----	SS.
License or registration period -----	SS.
License fees -----	SS.
Bond/insurance -----	SS.
Special ID cards -----	SS.
Special badge -----	SS.
Special uniform -----	SS.
Training required -----	SS.
Legal authority above that of ordinary citizen -----	SS.
Handguns: Additional license required -----	SS.
Restrictions -----	SS.
Proficiency test -----	SS.

\* SS means statute is silent.

APPENDIX C: Survey Questionnaire of Private Security Regulation

This study of the private security industry being conducted by The Rand Corporation for the United States Department of Justice encompasses the following types of private security personnel and businesses:

- Guards
- Watchmen
- Patrolmen
- Armored Car Personnel
- Private Investigators
- Private Police Forces
- Central Station Alarm Services
- Insurance Investigators
- Repossessors
- Process Servers
- Special Police (e.g., airport, park, or railroad police forces)
- Polygraph Operators

We are concerned with the businesses which oper-

ate in these areas of private security, as well as the personnel who carry out the actual security functions. Furthermore, we are concerned both with independent "contract" security agencies, such as Pinkerton's, Inc., and the William J. Burns International Detective Agency, as well as the "in-house" guards and investigators who are individually employed by such firms as department stores, manufacturing firms, and insurance companies.

The study will result in a description of the state of the private security industry, the present government regulation of the industry, and recommendations for future regulatory efforts. In this survey, we ask for your data on the size of the industry and its basic problems. We also would like to know the extent of your regulation of the industry, and your suggestions on possible improvements or changes in such regulation.

Thank you for your cooperation.

SURVEY OF PRIVATE SECURITY REGULATION

I. BACKGROUND INFORMATION

1. Name and address of regulatory agency:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Name and telephone number of agency administrator:

\_\_\_\_\_

3. Name and telephone number of person or persons completing this questionnaire:

\_\_\_\_\_  
\_\_\_\_\_

4. What is the geographical jurisdiction of your agency?

\_\_\_\_\_  
\_\_\_\_\_

5. What are the names and addresses of other agencies in your state that also regulate private security?

\_\_\_\_\_  
\_\_\_\_\_

6. Do you desire that we treat certain answers as confidential? \_\_\_\_\_  
 If so, which question numbers do you want to be confidential?  
 \_\_\_\_\_

7. Please send all the current *rules and regulations* for private security businesses, personnel, and activities promulgated by your agency, or by related agencies in your jurisdiction.

**II. LICENSING**

8. Do you issue licenses for any of the following categories of security related businesses or personnel? \_\_\_\_\_ If so, please place a check next to each category you license.

- |   |  |
|---|--|
| <p><i>Contract agencies*</i></p> <p>___ Contract guard agencies</p> <p>___ Contract investigative agencies</p> <p>___ Contract patrol agencies</p> <p>___ Contract police agencies</p> <p>___ Central station alarm companies</p> <p>___ Armored car companies</p> <p>___ Retail credit agencies</p> <p><i>Contract Personnel</i></p> <p>___ Contract guards</p> <p>___ Contract investigators</p> <p>___ Contract patrolmen</p> <p>___ Contract policemen</p> <p>___ Central station alarm personnel</p> <p>___ Polygraph operators</p> <p>___ Armored car personnel</p> | <p><i>In-house* forces and personnel</i></p> <p>___ In-house guard forces</p> <p>___ In-house investigative forces</p> <p>___ In-house police forces</p> <p>___ In-house guards</p> <p>___ In-house investigators</p> <p>___ In-house police</p> <p>___ Insurance investigators</p> <p><i>Miscellaneous</i></p> <p>___ Repossessors</p> <p>___ Process servers</p> <p>___ Special police (e.g., airport, park, or rail police forces)</p> <p>___ Retail credit investigators</p> |
|---|--|

- (a) What is the total number of all such licenses currently outstanding?  
 \_\_\_\_\_
- (b) How many new licenses did your agency issue in 1970? \_\_\_\_\_  
 1969? \_\_\_\_\_ 1968? \_\_\_\_\_
- (c) Please state the number of licenses currently outstanding for each of the categories (listed above) which you license.

Category of Firm or employee	Number currently licensed

\*Contract agencies are those businesses, such as Pinkerton's, Inc. or William J. Burns International Detective Agency, who sell security services to various other businesses or persons on a contract basis. Contract personnel are those persons who work for the contract agency such as Pinkerton's. In-house forces and personnel are security people who work on a permanent basis for a single employer, such as Macy's or General Motors.

8. (continued)  
 (d) How do you learn about organizations or individuals illegally operating without the necessary license?  
 \_\_\_\_\_  
 \_\_\_\_\_

9. How many licenses for security related firms or personnel were denied by your agency in 1970? \_\_\_\_\_ 1969? \_\_\_\_\_ 1968? \_\_\_\_\_

- (a) What are the five most prevalent reasons for such denials?  
 (1) \_\_\_\_\_  
 (2) \_\_\_\_\_  
 (3) \_\_\_\_\_  
 (4) \_\_\_\_\_  
 (5) \_\_\_\_\_

(b) By category of firms and personnel listed in Question 8, please state the number of licenses denied in 1970 and the major reasons for denial.

Category of firm or employee	Number of licenses denied	Reasons for denials

**III. COMPLAINTS AND SANCTIONS AGAINST SECURITY BUSINESSES AND PERSONNEL**

10. Please state the total number of complaints against security personnel and businesses received by your agency in 1970 \_\_\_\_\_ 1969 \_\_\_\_\_ 1968 \_\_\_\_\_

(a) What are the five most prevalent types of complaints against security businesses received by your agency? You may want to consult a list of typical complaints contained in Question 19:

- (1) \_\_\_\_\_  
 (2) \_\_\_\_\_  
 (3) \_\_\_\_\_  
 (4) \_\_\_\_\_  
 (5) \_\_\_\_\_

(b) Of the categories of security businesses and personnel listed in Question 8, which five generate the most complaints?

- (1) \_\_\_\_\_  
 (2) \_\_\_\_\_  
 (3) \_\_\_\_\_  
 (4) \_\_\_\_\_  
 (5) \_\_\_\_\_

(c) Please list the five most common ways by which complaints first come to your agency's attention:

- (1) \_\_\_\_\_  
 (2) \_\_\_\_\_

10. (c) (continued)

- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

11. How many licenses were revoked by your agency in 1970? \_\_\_\_\_  
1969? \_\_\_\_\_ 1968? \_\_\_\_\_

(a) What are the five most prevalent grounds for license revocation?

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

12. How many licenses were suspended by your agency in 1970? \_\_\_\_\_  
1969? \_\_\_\_\_ 1968? \_\_\_\_\_

(a) What are the five most prevalent grounds for license suspension?

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

(b) What is the average length of time for which a license is suspended?  
\_\_\_\_\_

13. Has your agency or have the courts imposed any fines on licensees or their employees for improper conduct? \_\_\_\_\_

(a) If so, how many fines were imposed in 1970? \_\_\_\_\_  
1969? \_\_\_\_\_ 1968? \_\_\_\_\_

(b) What are the five most prevalent grounds for imposing fines?

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

(c) What is the amount of the fine usually imposed? \_\_\_\_\_

(d) What is the largest fine your agency or the courts have imposed since 1968? \_\_\_\_\_

14. Please state the total number of private security employees sentenced to jail as a result of improper conduct in 1970 \_\_\_\_\_ 1969 \_\_\_\_\_  
1968 \_\_\_\_\_

(a) What is the average sentence imposed in such cases? \_\_\_\_\_

(b) What are the five most prevalent incidents or abuses that lead to prosecution?

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

14. (continued)

(c) What part did your agency play in bringing about such prosecutions?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

15. Apart from revocation or suspension of license, fines, or prosecution, what other kinds of disciplinary action has your agency taken with regard to illegal actions by private security firms or personnel? How frequently is each of these other kinds of disciplinary action taken? For what types of incidents?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

16. Does your agency know the number of times the private security firms' insurance companies or bonding companies paid claims as a result of improper security employee actions in 1969? \_\_\_\_\_

(a) If so, how many insurance claims were paid in 1969? \_\_\_\_\_

(b) What is the size of typical insurance claim payments?  
\_\_\_\_\_

(c) What are the five most prevalent improper actions by security employees that result in insurance claims?

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

(d) If so, how many bond claims were paid in 1969? \_\_\_\_\_

(e) What is the size of a typical bond claim payment? \_\_\_\_\_

(f) What are the five most prevalent improper actions by security employees that result in bond claims?

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

17. Does your agency investigate the conduct of licensed security businesses or personnel without receiving a complaint? \_\_\_\_\_

-If so, please describe the nature of these investigative efforts.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

18. Please complete the following table, describing each complaint received by your agency in 1969. If you received more than 50 complaints during 1969, please select and describe representative types of complaints and indicate the approximate number of each type.





24. (continued)

Remarks: \_\_\_\_\_

(b) Should any individual employees be required to pass a psychological test prior to beginning work? \_\_\_\_\_. If so, which categories of employees? \_\_\_\_\_

25. Should minimum educational standards be established for private security and investigative employees? \_\_\_\_\_.  
If so, describe below.

Category of employee (see question 20)	Minimum educational requirement

Remarks: \_\_\_\_\_

26. Should minimum prior security work experience standards be established? \_\_\_\_\_

If so, describe.

Category of employee or licensee	Minimum experience required

Remarks: \_\_\_\_\_

27. Should age restrictions be placed on employees? \_\_\_\_\_

If so, describe.

Category of employee	Age restrictions

Remarks: \_\_\_\_\_

28. Should residency or citizenship restrictions be placed on employees or licensees? \_\_\_\_\_

If so, describe:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

29. For the various types of licensees and employees, describe the type of criminal records check you recommend and the type of arrest record or conviction record that should prohibit employment.

Category of licensee or employee	Recommended records checks (federal, state, local)	Reasonable grounds for refusing license or employment (types of arrests and/or convictions)

Remarks: \_\_\_\_\_

30. Should a prospective licensee's or employee's references, neighbors, or past employers be checked? \_\_\_\_\_. If so, describe.

Category of licensee or employee	Recommended background checks

Remarks: \_\_\_\_\_

31. Should all private security and investigative employees be required to carry a specified identification card? \_\_\_\_\_

Should regulations governing allowable types of uniforms, insignia, and badges be established? \_\_\_\_\_

Should uniforms be distinctly different from those of the public police? \_\_\_\_\_

Remarks: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

32. What *initial* training (legal powers, operating procedures, weapons on and off range, first aid, fire prevention, etc.) would you recommend for private security and investigative personnel?

Category of personnel	Desirable training		Minimum acceptable training	
	Hours	Topics	Hours	Topics

Please mark with an asterisk those topics that you feel can be taught *after* the employee begins his security work.

Do you feel that a minimum of training should be made mandatory?

Remarks: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

33. What periodic *retraining* would you recommend?

Category of personnel	Desirable training		Minimum acceptable training	
	Hours	Topics	Hours	Topics

If a man is armed and you recommended periodic range qualification, how frequently should that be given? \_\_\_\_\_

How frequently should retraining, other than firearms qualification, be given? \_\_\_\_\_

Do you feel that a minimum level of retraining should be made mandatory? \_\_\_\_\_

Remarks: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

34. Would you prohibit certain types of security and investigative personnel on certain types of assignments from carrying firearms? \_\_\_\_\_ or concealed firearms? \_\_\_\_\_

If so, what types of personnel and job assignments? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

35. Would you prohibit personnel from carrying certain other weapons (baton, blackjack, chemical agents, etc.)? \_\_\_\_\_

If so, please elaborate  
\_\_\_\_\_  
\_\_\_\_\_

36. Should any private security or investigative personnel be deputized (given full police powers)? \_\_\_\_\_ If so, describe the types of personnel and job assignments that you feel require deputization \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

37. What are your views on how the public police and private security and investigative personnel should interact? On the appropriate functions for private personnel to perform? On crime reporting by private personnel? On when the public police should be called for assistance?\*

38. Private security and investigative personnel and agencies employ a wide variety of methods and operating procedures in performing their work. Please describe any methods and operating procedures that you would either make mandatory or prohibit.\* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

39. We would appreciate any additional suggestions or comments regarding regulation of the private security industry in areas not covered above.\* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

40. Are present methods of regulation, enforcement mechanisms, and penalties for violations adequate? How would you change them?\*

\* Please attach additional pages if necessary to fully explain your views.

41. Should regulation be carried out at the federal, state, or local level? Or on two or three levels? Why? If you feel that regulatory responsibilities should be divided, how would you divide them? Should the level of regulation differ for different types of security firms and personnel? If so, how?\*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\*Please attach additional pages if necessary to fully explain your views.

## VI. REGULATORY AGENCY PERSONNEL AND BUDGET

42. What was the total number of personnel\* in your agency in 1970 engaged in licensing, investigation, and regulation of private security activities? \_\_\_\_\_ Of the total, how many are clerical employees? \_\_\_\_\_ How many are investigators? \_\_\_\_\_

43. What was your agency's total budget for licensing and regulating private security activities\* for 1970? \_\_\_\_\_

44. How many man-hours does your agency spend verifying the information on a typical license application? \_\_\_\_\_

45. How many total man-hours does your agency spend processing a typical complaint against a private security firm or employee? \_\_\_\_\_

46. Do you have sufficient personnel to adequately perform your assigned functions? \_\_\_\_\_ If not, how many *new* personnel do you feel are needed? \_\_\_\_\_ How many of these new personnel would be investigators? \_\_\_\_\_ Which of your presently assigned functions are not receiving adequate attention because of lack of personnel? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

47. In a previous section, we asked for suggestions for changes in the present laws and regulations on private security activities. If your suggested changes were to be implemented fully, how many total *new* staff members would be required? \_\_\_\_\_ How many of these new staff members would be investigators? \_\_\_\_\_  
\_\_\_\_\_

\*If your agency also regulates activities other than private security, please indicate only the portion of the budget and the number of "fulltime-equivalent" personnel devoted to regulating private security.

*APPENDIX D: MAILING LIST Agencies That Regulate the  
Private Security Industry*

Mr. Jamie Moore  
The Chief of Police  
City of Birmingham  
Birmingham, Alabama 35203

Drue H. Lackey  
The Chief of Police  
City of Montgomery  
Montgomery, Alabama 36102

Commissioner George A. Morrison  
Department of Revenue  
State of Alaska  
Alaska Office Building  
Pouch SA  
Juneau, Alaska 99801

Captain L. E. Gwynn  
Investigator Licensing Board  
Arkansas State Police  
3701 West Roosevelt Road  
Little Rock, Arkansas 72205

William J. Mooney  
The Chief of Police  
City of Long Beach  
P.O. Box 20100  
Long Beach, California 90802

Mr. Emmett McGaughey, President  
Board of Police Commissioners  
150 North Los Angeles Street  
Los Angeles, California 90012

Charles R. Gain  
The Chief of Police  
City of Oakland  
City Hall, 14th & Washington  
Oakland, California

Mr. Gordon H. Bishop, Chief  
Bureau of Collection and Investigative Services  
1021 "O" Street, Room A-401  
Sacramento, California 95814

Mr. R. J. Quinlan, Deputy Collector  
Office of the Collector  
City Hall, Room 104  
Sacramento, California 95814

Sheriff John F. Duffy  
San Diego County Sheriff's Department  
P.O. Box 2991  
San Diego, California 92112

Alfred Nelder  
The Chief of Police  
City of San Francisco  
850 Bryant Street  
San Francisco, California 94107

Mr. T. W. Fletcher, City Manager  
City of San Jose  
801 North First Street  
San Jose, California

Sheriff James A. Musick  
Sheriff's Department  
Orange County  
Santa Ana, California 92700

Honorable Byron Anderson  
Secretary of State  
State Capitol Building  
Denver, Colorado 80203

Mr. G. A. Canjar, Manager  
Department of Safety and Excise  
City and County of Denver  
1445 Cleveland Place  
Denver, Colorado 80202

Commissioner Cleveland B. Fuessenich  
Department of State Police  
State of Connecticut  
100 Washington Street  
Hartford, Connecticut 06101

Col. G. J. Bundek, Chairman  
Board of Examiners for Private Detectives  
Box 430 Delaware State Police  
Dover, Delaware 19901

L. H. Rollins, Chief  
Department of State, Bureau of Licensing  
3399 Ponce De Leon Boulevard  
Coral Gables, Florida 33134

Mr. John M. Waters, Jr., Director  
Department of Public Safety  
Jacksonville, Florida 32202

J. G. Littleton  
The Chief of Police  
City of Tampa  
1710 Tampa Street  
Tampa, Florida 33602

Mr. Herbert T. Jenkins  
Police Committee  
City of Atlanta  
Atlanta, Georgia 30303

Mr. Edwin Honda, Director  
Board of Private Detectives and Guards  
Department of Regulatory Agencies  
State of Hawaii, Box 3469  
Honolulu, Hawaii 96801

Mr. James B. Conlisk, Jr., Superintendent  
Chicago Police Department  
1111 South State Street  
Chicago, Illinois 60605

Mr. R. J. Lindley, City Clerk  
City Hall  
425 East State Street  
Rockford, Illinois 61105

Mr. William H. Robinson, Director  
Department of Registration and Education  
628 East Adams Street  
Springfield, Illinois 62706

Mr. Robert K. Konkle, Superintendent  
Indiana State Police Department  
State Office Building, Room 301  
Indianapolis, Indiana 46204

Michael Sellars, Commissioner  
Department of Public Safety  
Bureau of Criminal Investigation  
State of Iowa  
Lucas State Office Building  
Des Moines, Iowa 50319

Merrell R. Kirkpatrick  
The Chief of Police  
City of Wichita  
Wichita, Kansas 67202

Honorable Elwill M. Shanahan  
Secretary of State  
State Office Building  
Topeka, Kansas 66612

Commissioner William O. Newman  
Department of Public Safety  
Commonwealth of Kentucky  
Frankfort, Kentucky 40601

Mr. A. J. Petreau, Director  
Division of Occupational Licenses  
Capitol Annex  
Baton Rouge, Louisiana 70804

Mr. Joseph I. Giarrusso  
Superintendent of Police  
P.O. Box 51480  
New Orleans, Louisiana 70150

Honorable Joseph T. Edgar  
Secretary of State  
Department of State  
State of Maine  
Augusta, Maine 04330

Commissioner Donald Pomerleau  
Police Headquarters  
100 Fallsway  
Baltimore, Maryland 21202

Colonel T. S. Smith  
Superintendent  
Maryland State Police  
Pikesville, Maryland 21208

Commissioner William F. Powers  
Massachusetts Department of Public Safety  
1010 Commonwealth Avenue  
Boston, Massachusetts 02215

Colonel John R. Plants, Director  
Department of State Police  
714 South Harrison Road  
East Lansing, Michigan 48823

Mr. Harvey Everson  
Police License Inspector  
City Hall, Room 45  
Minneapolis, Minnesota 55415

Superintendent Harold P. Higgins  
Minnesota Department of Public Safety  
St. Paul, Minnesota 55101

Mr. Robert J. di Grazia  
Superintendent  
St. Louis County Department of Police  
Clayton, Missouri 63105

Lt. Colonel Bryce Thompson  
Board of Police Commissioners  
Kansas City, Missouri 64106

Colonel James L. Sanders, President  
Board of Police Commissioners  
City of St. Louis  
St. Louis, Missouri 63100

Honorable Allen J. Beermann  
Secretary of State  
Suite 2300, Capitol Building  
Lincoln, Nebraska 68509

Honorable Robert List  
Attorney General and Chairman  
Private Investigator Licensing Board  
Supreme Court Building  
Carson City, Nevada 89701

Mr. Jean Dutton  
Director of License and Revenue  
P.O. Box 1900  
City Hall  
Las Vegas, Nevada 89100

Mr. E. E. Gill  
City Clerk  
Reno, Nevada 89500

Mr. John L. Redden, Director  
Police Department  
Newark, New Jersey 07102

Colonel D. B. Kelly  
Superintendent  
Division of State Police  
Department of Law and Public Safety  
West Trenton, New Jersey 08625

Captain Hoover Wimberly  
Bureau of Private Investigators  
Department of Justice  
State of New Mexico  
Santa Fe, New Mexico 87501

Mr. Elia J. Malara, Director  
Division of Licensing Services  
State of New York  
162 Washington Avenue  
Albany, New York 12225

Mr. Charles J. Dunn, Director  
State Bureau of Investigation  
Department of Justice  
Raleigh, North Carolina 27600

Honorable Helgi Johanneson  
Attorney General  
State of North Dakota  
Bismarck, North Dakota 58501

Mr. George W. O'Connor, Director  
Department of Public Safety  
City of Cleveland  
Cleveland, Ohio

Colonel Anson B. Cook  
Executive Director  
Ohio Peace Officers Training Council  
Room 318, 400 South Third Street  
Columbus, Ohio 43215

Mr. Lloyd E. Lindsley, Chief  
Division of Licenses  
Department of Commerce  
366 East Broad Street  
Columbus, Ohio 43215

Donald G. Baker  
The Chief of Police  
Youngstown Police Department  
Youngstown, Ohio 44503

E. W. Lawson  
The Chief of Police  
City of Oklahoma City  
Oklahoma City, Oklahoma 73102

Jack Purdie  
The Chief of Police  
City of Tulsa  
Tulsa, Oklahoma 74120

Mr. Robert Grewell  
Director of Finance  
City of Salem  
Salem, Oregon 97301

Mr. Erwin Lodge, Clerk  
Court of Quarter Sessions  
Philadelphia County  
City Hall, Room 685  
Philadelphia, Pennsylvania 19100

Mr. John H. Bingler, Jr., Director  
Department of Public Safety  
City of Pittsburgh  
Public Safety Building  
Pittsburgh, Pennsylvania 15219

Mr. J. P. Strom, Chief  
Law Enforcement Division  
State of South Carolina  
P.O. Box 1166  
Columbia, South Carolina 29202

Chief H. C. Huskisson  
Department of Public Safety  
Knoxville, Tennessee 37900

Henry E. Lux  
The Chief of Police  
City of Memphis  
Memphis, Tennessee 38103

Commissioner T. D. Benson  
Department of Revenue  
State of Tennessee  
Andrew Jackson State Building  
Nashville, Tennessee 37219

Mr. T. W. Brown, Director  
Texas Board of Private Detectives, Investigators,  
Patrolmen, Guards and Managers  
Sam Houston Office Building  
Austin, Texas 78711

Frank Dyson, Chief  
Dallas Police Department  
210 South Harwood Street  
Dallas, Texas 75201

C. C. Whitehead  
The Chief of Police  
City of Salt Lake City Police Department  
450 South Third East  
Salt Lake City, Utah 84111

Honorable Richard C. Thomas  
Secretary of State  
Division of Licensing and Registration  
State of Vermont  
Montpelier, Vermont 05602

Frank S. Duling, Chief  
City of Richmond Police Department  
Richmond, Virginia 23219

Mr. R. K. Snell, Director  
Division of Licenses and Standards  
Seattle Municipal Building  
Seattle, Washington 98104

Mr. Charles K. Waitt, Manager  
King County License Department  
King County Administration Building, Room 430  
Seattle, Washington 98104

Mr. C. T. Nottingham, Chief  
Department of Economic Development  
Government of the District of Columbia  
License Branch, 614 H Street, N.W.  
Washington, D.C. 20004

Honorable John D. Rockefeller IV  
Secretary of State  
State of West Virginia  
Charleston, West Virginia 25305

Mr. George Greeley  
Department of Regulation and Licensing  
State of Wisconsin  
110 N. Henry Street  
Madison, Wisconsin 53702

Mr. Ray Markey  
Office of the City Clerk  
Police Administration Building  
749 West State Street  
Milwaukee, Wisconsin 53202

Mr. John B. Huisman  
County Clerk  
Laramie County  
Cheyenne, Wyoming 82001

*APPENDIX E: Detailed Regulatory Agency Comments on  
Licensing and Training*

**LICENSING COMMENTS**

**Alabama**

*Birmingham.* The entire question of which private security forces and personnel should be regulated and the manner of regulation is currently under intensive study. Generally, any person performing a law-enforcement-related duty should be licensed.

**California**

Firms that represent to the public that they are qualified to perform certain types of security work should be licensed by the state to preclude undesirables and totally incompetent persons from victimizing the public. Categories of licensing should be cautiously drawn to avoid restrictions on competitive enterprise in areas where the public interest is not essentially affected. Frequently, licensing statutes are instigated by self-serving industry groups and entry into vocations becomes restricted by regulations that could more effectively be controlled by competition.

The California Bureau of Collection and Investigative Services used to register the employees of investigators, insurance adjusters, and repossessioners. The total result was a monumental headache with scanty results to show for it. Licensees would neglect to report new employees—but even worse, they would forget to report their terminations. The paper mill that was created was never reliable and eventually simply became an end in itself, a typical bureaucratic operation. The measure of the results of that registration program should be indicated by the number of persons denied employment as unfit and those removed from employment for improper conduct. The following data are for the three-year time period (1966-1968):

Number of registrations granted..	over 4,000
Number of applicants taken to hearing .....	10
Number of applicants denied after hearing .....	3
Number of registrations revoked after hearing .....	17
Average length of time between occurrence of misconduct and date of revocation, months ..	22
Number of registrants who left employment before the mis-	

conduct occurred .....	7
Number of residents who left employment before hearing decision was rendered .....	6
Number of registrants removed from employment because of revocation or misconduct ----	4

This survey, of course, cannot count the number of undesirables who may have been deterred from becoming employed in those industries because of the necessity of fingerprinting and registration. This is perhaps a more significant figure if it were available. But from the data above, it would have to be a startling figure to balance the dismal failure of the program evidenced by the data.

During the 20 months since the registration program has been repealed, the Bureau has become aware of only one single instance where the absence of the control was missed, where it would have seemed beneficial to the public interest to have denied an individual employment as an investigator.

*Los Angeles.* Agencies and employees should be licensed or registered if they are sometimes armed, provide protection and service at various locations, use public streets, are in contact with citizens, or are entrusted with items and information of trust. Licensing or registration is not recommended for agencies serving a fixed location not on public streets, with employees who are under the control and acting in the interest of their employer.

*Oakland.* Agencies performing police-related tasks, frequently allowing easier access to otherwise confidential records, information, and otherwise secure premises and persons, should be licensed.

*San Jose.* Licensing of in-house security personnel is not recommended because they are hired by private businesses.

**Connecticut**

All agencies who furnish security for hire should be investigated before licensing and regulated after licensing to protect the welfare of the public.

**Florida**

Individual employees should be investigated as to character and should be known to the regulatory agency, but not licensed.

**CONTINUED**

**2 OF 3**

APPENDIX E: Detailed Regulatory Agency Comments on Licensing and Training

LICENSING COMMENTS

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Connecticut

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Florida

Individual employees should be investigated as to character and should be known to the regulatory agency, but not licensed.

Iowa

Contract agencies and personnel should be licensed to insure honest people in the field of security for the protection of clients. In-house people are the responsibility of the employer.

Kentucky

Any security force authorized to carry firearms, exercise police powers, or conduct criminal investigations should be licensed and subject to regulations.

Maryland

Registration of all employees prior to beginning work assignments should be required to obtain effective pre-employment screening of individual employees.

Michigan

These agencies and employees should be licensed in order for the general public to be protected against unauthorized, unlicensed, and unethical operations by persons in the various fields of protection. Polygraph operators should be licensed to protect the industry against the establishing of businesses by unethical persons who are unqualified and without the proper training and background.

Financial company investigators often investigate other nonfinancial matters and are on the borderline regarding whether or not they should be licensed. Contract private detective agencies often complain of such operations.

Missouri

*Kansas City.* Those categories recommended for licensing perform police functions of either conducting investigations or providing protection of people or property. The duties of insurance adjusters, repossessioners, process servers, and polygraph operators do not include police-related activity and are not a proper subject for police regulation.

*St. Louis.* The United States Supreme Court in the case of the National Labor Relations Board vs. Jones and Laughlin Steel Corporation, 91 L.2d., page 1575, l.c.1583, discussed the status of private watchmen and guards who are licensed and appointed by either state or city officials: "... it is common practice in this country for private watchmen or guards to be vested with the powers of policemen, sheriffs, or peace officers to protect the private property of their employers. And when they are performing their police functions, they are acting as public officers and assume all the powers and limitations attached thereto."

The above principle of law seems to clearly establish that private watchmen, guards, etc., have both public authority and the attendant responsibilities in Missouri. The St. Louis Board of Police Commissioners are the public agency responsible for the protection and policing of the city. Therefore, the control of all phases of private security is clearly the responsibility of the Board of Police Commissioners.

*St. Louis County.* The security employees checked should be licensed because they are performing certain duties of a policeman. They are generally armed and work in plain view of the public. If they are given certain police powers they should be well trained in the law-enforcement field. Also, a license would serve as proof of training and act as a method of control over the entire program. The agencies and employees with duties which are not those of a public policeman should not be licensed.

Nevada

In-house security personnel are not recommended for licensing because the employer can afford to get background information on the employee himself.

New Jersey

There is a trend in the security industry to large corporations operating in several states. Such out-of-state corporations hire "managers" who operate the business in the State of New Jersey but are not licensed or investigated by the state police. The "qualifying person," upon whose experience a corporation's license is granted, frequently has no part in the management of the business in the State of New Jersey and only holds a title such as assistant vice-president, merely to comply with the licensing requirement.

*Newark.* Licensing would allow minimum standards to be set. The expansion of contractual security services requires regulation. In-house service agencies do not require regulation because they are limited in their interaction with the police function.

North Dakota

All categories of private security should be licensed, since each deals with either invasion of privacy, use or carrying of weapons, prerequisite technical proficiency, or representation to the public as being a quasi-governmental officer.

Ohio

*Cleveland.* Certain types of private security officers and agencies should be licensed so that public agen-

cies will have some control over the police action taken by them.

### Texas

Certain agencies should be licensed and regulated because they are dealing with the general public's privacy. In-house employees are regulated by their employers and the public is protected to a certain extent by these established firms. Therefore, it is not so important that in-house personnel be licensed.

*Dallas.* Any person who must be armed for the purpose of protecting persons or property should be investigated.

### Virginia

*Richmond.* Private agencies should be required to be responsible for the actions of their employees and only individuals with special police powers would need to be licensed.

### Washington

*Seattle.* A task force is in the process of revising licensing for private security personnel. No recommendations are presently available.

### City A

In-house guards, investigators, and other security employees are employees of the one business involved and as such are the responsibility of said business.

### City B

All categories of agencies should be licensed by the regulatory agency and not allowed to operate until specific qualifications are met. All categories of agency operators and their employees should be required to register with the police department in the county in which they have a license to do business. This would be an excellent control factor and would supply criminal backgrounds of the employer and employees as well as fingerprints.

The present licensing program provides special-officer permits to only employees of establishments, primarily shoplifting details, that provide a service to the city by expediting the arrest procedure and thereby reducing out-of-service time of public police patrol units.

### City C

A determining factor in whether private security personnel should be licensed or not should be whether he deals in any way with the public. If his work is strictly in-house guard duty, no license is necessary. Agencies should be licensed because of the quasi-

public function they perform. Since insurance adjusters perform a private business function, it is not necessary that they be licensed.

## TRAINING RECOMMENDATIONS

### California

Category of personnel:	Topics	
Training	12 hours on legal and moral aspects of the use of weapons, defensive firing, weapon safety, weapon familiarization, written policy, and firing range practice	(6 hours min.)

California legislation in 1970 authorized mandatory training for uniformed armed employees.

### Los Angeles, California

Category of personnel:	Topics	
Contract guard and patrol	2 hours on gun safety	(2 hours min.)
	2 hours on when to shoot	(2 hours min.)
	8 hours on the laws of arrest	(8 hours min.)
	2 hours on the scope of authority	(2 hours min.)

Training of private security personnel can better be done by a public state-wide agency than by a private training school. Some private training schools would be nothing more than "mail order diploma" schools.

### Oakland, California

Category of personnel:	Topics	
Armed personnel	16 hours on firearms safety and qualification	(8 hours min.)

Mandatory training is an absolute necessity for any employee who, by the nature of his work, carries a weapon.

### San Diego County, California

Training should be state wide in the interest of uniformity. Patrolmen should be trained in the legal and moral use of firearms, the basic laws of arrest, first aid, and basic criminal law.

### San Jose, California

Category of personnel:	Topics	
Private	12 hours on firearms	(8 hours min.)
patrol	12 hours on first aid	(10 hours min.)
	8 hours on fire prevention	(4 hours min.)
	24 hours on patrol procedures	(18 hours min.)
	16 hours on general law enforcement	(8 hours min.)

### Denver, Colorado

Category of personnel:	Topics	
Guards	16 hours on the law of arrest, search and seizure and interrogation	(8 hours min.)

### Connecticut

Category of personnel:	Topics	
All licensed personnel	10 hours on the knowledge of laws governing their respective fields	(10 hours min.)
	12 hours on the laws governing weapons	(12 hours min.)
	10 hours on first aid	(10 hours min.)
	10 hours on fire prevention	(10 hours min.)

### Florida

Minimum training should be made mandatory. The details are under study.

### Iowa

Training should be comparable to the recruit training given police; for investigators, training should be comparable to that required for police who enter the Detective Bureau.

### Wichita, Kansas

A 40-hour course covering specified topics has been proposed. Current thinking is that security companies should be required to train their own people, with courses subject to police approval rather than having a law-enforcement agency provide the training.

### Kentucky

Training all categories of personnel in basic police science should be mandatory.

### Maryland

The cost of training security guards and private police is prohibitive, especially for the smaller companies. The local political subdivisions may have to assume this cost in the future.

### Michigan

The present Michigan law requires all private in-house security forces seeking (nonmandatory) licensing to comply with training requirements as prescribed by the Michigan State Police.

Category of personnel:	Topics
All guards	Use of weapons Legal authority of a guard

Category of personnel:	Topics
Guards with full arrest powers	6 hours on arrest, search and seizure 2 hours on juvenile law 6 hours on criminal law 2 hours on evidence 2 hours on bombs 1 hour on court testimony 20 hours on firearms 10 hours on first aid 10 hours on defensive tactics 5 hours on traffic 2 hours on police courtesy 3 hours of handling abnormal persons 2 hours on fire safety

### Minnesota

Category of personnel:	Topics
Investigators	20 hours on basic investigative techniques (10 hours min.) 5 hours on rules of evidence (5 hours min.) 5 hours on public relations (5 hours min.) 20 hours on criminal law (10 hours min.) 20 hours on civil law (10 hours min.)
Security and patrol personnel	10 hours on patrol and security techniques (10 hours min.) 5 hours on criminal law (5 hours min.) 5 hours on public relations (2 hours min.) 5 hours on uniforms, equipment, and first aid (2 hours min.)

### Kansas City, Missouri

The training program should be conducted by the employer rather than the police department. Other police responsibilities are far more pressing.

### St. Louis County, Missouri

Category of personnel:	Topics
All guards and investigators	2 hours on the law of arrest, search and seizure 2 hours on the ordinances and state statutes 1 hour on first aid 1 hour on the mechanics of making an arrest and basic self-defense 2 hours on crime scene discussion and warrant application

Category of personnel:	Topics
	2 hours on patrol techniques and shop-lifting
	2 hours on public relations
	1 hour on fire prevention
	1 hour on firearms in the classroom
	1 hour on firearms at the training range

Minimum training requirements would be one-half of the above times.

When entrusting a person with certain powers of a police officer, he should be given the training necessary to properly function with these powers.

### St. Louis, Missouri

In-house guards, private patrolmen, and contract guards are licensed by the City of St. Louis and may exercise the same powers as a public policeman while on duty at their specified work location. Each individual licensee must satisfactorily pass a prescribed 3-day course of instruction at the St. Louis Police Training Academy. The 3-day employee training program covers rules and regulations, criminal law, arrest, search and seizure, criminal evidence, court and warrant procedures, crime investigations, defense tactics, firearms instruction, business protection techniques, and first aid.

### Nevada

All private security personnel should have sufficient training to pass a rigid examination.

### Newark, New Jersey

Category of personnel:	Topics
Patrolmen and guards	10 hours on patrol and security functions (5 hours min.)
	10 hours on legal code and laws of arrest, search and seizure (5 hours min.)
	2 hours on interviewing and interrogation (2 hours min.)
	10 hours on defense tactics (5 hours min.)
	15 hours on first aid (5 hours min.)
	5 hours on report writing (3 hours min.)
	5 hours on community relations (2 hours min.)
	5 hours on court procedure and testimony (2 hours min.)
	40 hours on firearms (40 hours min.)

Category of personnel:	Topics
	2 hours on interaction with local police agencies (1 hour min.)
	1 hour on personal hygiene (1 hour min.)
	2 hours on fire prevention and control (2 hours min.)
	1 hour orientation (1 hour min.)
	5 hours testing (3 hours min.)

All training should be given prior to deployment on work assignments.

Investigator and supervisor training should be applicable to their area of responsibility.

### Ohio

Local jurisdictions in the State of Ohio may require the commissioning of private security employees. Commissioning does not necessarily give the employee any legal authority or power above that of every citizen. The state law requires that all commissioned private security personnel successfully pass a 120-hour mandatory training program at an approved school, with approved instructors, and following a curriculum prescribed by the Ohio Peace Officer's Training Council.\* The training must be completed within one year of the date of employment. It would be mandatory for all private security personnel to receive some type of training.

### Cleveland, Ohio

A 120-hour course should include the law of arrest, rules of evidence, first aid, and firearms training.

### Salem, Oregon

Category of personnel:	Topics
Private detective and patrol	2 hours on legal aspects of the job (1 hour min.)
	2 hours on police relations (1 hour min.)

### Texas

Category of personnel:	Topics
Private investigator	12 hours on legal powers (12 hours min.)
	12 hours on first aid (12 hours min.)
	16 hours on operating procedures (16 hours min.)
Security employee	12 hours on legal powers (12 hours min.)
	12 hours on first aid (12 hours min.)
	16 hours on operating procedures (16 hours min.)
	10 hours on firearms training (10 hours min.)

\* This curriculum is described in detail in R-870-DOJ.

### Dallas, Texas

Category of personnel:	Topics
All types of personnel	4 hours on legal powers (2 hours min.)
	2 hours on operating procedures (1 hour min.)
	6 hours on weapons (4 hours min.)
	10 hours on all other topics (6 hours min.)

### City A

Category of personnel:	Topics
Investigators	50 hours on surveillance (25 hours min.)
	50 hours on interviewing (25 hours min.)
	50 hours on the legality of wiretapping and bugging (25 hours min.)
Guards	50 hours on the use of firearms (50 hours min.)
	10 hours on first aid (10 hours min.)
	10 hours on crowd control (10 hours min.)
Armored car personnel	25 hours on the identification of cars and license plates (25 hours min.)
	50 hours on the use of weapons (50 hours min.)

Some present guards have never fired a weapon.

### City B

Category of personnel:	Topics
All categories of security and investigative personnel	20 hours on legal powers (8 hours min.)
	20 hours on firearms (8 hours min.)
	8 hours on first aid (8 hours min.)
	8 hours on fire prevention (8 hours min.)
	8 hours on relations with law-enforcement agencies (8 hours min.)
	8 hours on report writing (4 hours min.)
	8 hours on public relations (4 hours min.)
	80 hours total (48 hours min.)

All training should be completed within 90 days.

### City C

Minimum training should be required for jobs where employees must deal directly with control of the public. A minimum state training program should be instituted and paid for by the employer. Topics would include the use of force, law of power of arrest, and public relations.

## RETRAINING RECOMMENDATIONS

### Oakland, California

Category of personnel:	Topics
Any armed personnel	3 hours on firearms safety and qualifications (2 hours min.)

Mandatory firearms training is necessary due to the need for the personal safety of the employee as well as any persons he may deal with.

### San Diego County, California

Private patrolmen should receive retraining on firearms and first aid.

### San Jose, California

Category of personnel:	Topics
Private patrol retraining	6 hours on firearms (4 hours min.)
	10 hours on first aid (6 hours min.)
	8 hours on law enforcement and new laws (4 hours min.)

### California

Category of personnel:	Topics
Uniformed, armed personnel	3 hours on a firing range

### Denver, Colorado

Refresher of initial training topics.

### Connecticut

All categories of licensed personnel should be retrained annually in the same topics in which they were originally trained.

### Florida

A minimum level of retraining should be mandatory. Details are currently under study.

### Michigan

Category of personnel:	Topics
Guards with police arrest powers	4 hours on firearms (2 hours min.)
	2 hours on first aid
	Hours as needed on court rulings pertaining to arrest, search, and seizure

### St. Louis, Missouri

Retraining is always desirable, but the burden on staff and budget expenditures is controlling.

### St. Louis County, Missouri

Category of personnel:	Topics
All contract and in-house guards	1 hour on the law of arrest, search and seizure, county ordinances and state statutes
All contract and in-house investigators	1 hour on new innovations in patrol techniques, shoplifting, fire prevention, and firearms 1 hour on first aid and public relations 4 hours on firearms range training

### Newark, New Jersey

Category of personnel:	Topics
Patrolmen and guards	2 hours review on general security topics (1 hour min.) 1 hour on new laws with respect to arrest, search and seizure (1 hour min.) 1 hour on community relations (1 hour min.) 2 hours on defense tactics (2 hours min.) 8 hours on firearms retraining (8 hours min.)

Retraining for other security personnel is best determined by the private security industry.

### Dallas, Texas

Category of personnel:	Topics
All categories of personnel	4 hours on legal powers and operating procedures (2 hours min.) 4 hours on weapons (2 hours min.) 2 hours on other topics (1 hour min.)

### Texas

Private investigators and private security employees should receive the same amount of retraining on the same topics as they receive in their initial training.

### King County, Washington

Category of personnel:	Topics
All categories of personnel	10 hours on police procedures 2 hours on court procedures

### City A

Category of personnel:	Topics
Guards	10 hours on first aid (10 hours min.) 10 hours on the use of weapons (10 hours min.)
Investigators	10 hours on new laws pertaining to their profession (10 hours min.)
Armored car personnel	10 hours on the use of weapons (10 hours min.)

The problem concerning retraining should be the responsibility of the owner of the agency and not the police department.

### City B

Category of personnel:	Topics
All security and investigative personnel	8 hours on legal powers (8 hours min.) 2 hours on firearms (2 hours min.) 4 hours on relations with law-enforcement agencies (4 hours min.)

### City C

The brief refresher course should be made mandatory by state law and should be at the employers' expense.

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# END