



Bureau of Security and Investigative Services
Advisory Committee Meeting Minutes
For **October 21, 2021 Meeting**
WebEx Teleconference Meeting

Industry Members Virtually Present

Brian Boeglin (Alarm Company Industry)
Phil Chachere (Training Facilities Industry)
Frank Huntington III (Private Investigator Industry)
Mark Miller (Private Patrol Operator Industry)
Chris Sayers (Proprietary Security Employer Industry)
Glenn Younger (Locksmith Industry)
Leon Scroggins (Repossessor Industry)

Public Members Virtually Present

Anton Farmby
Darren Morgan
Nancy Murrish

Members Absent

Eli Owen
Stanton Perez

Bureau Staff Virtually Present

Lynne Andres – Chief
Gloriela Garcia – Deputy Chief, Licensing and Policy
Samuel Stodolski – Deputy Chief, Enforcement
Antoine Hage – Manager, Policy and Administration Unit

DCA Staff Virtually Present

Kimberly Kirchmeyer – Director of DCA
Carrie Holmes – Deputy Director, DCA Board and Bureau Relations
David Bouilly – WebEx Moderator

Minutes Taken By

Steven Mao

Jayme Richards

1. Call to Order

The meeting is called to order at 10:00am by Chief Andres.

2. Swearing in of any new Advisory Committee Members by Department of Consumer Affairs Director Kimberly Kirchmeyer (including new member, Leon Scroggins)

At 10:01am, Director Kimberly Kirchmeyer swears in Leon Scroggins, who represents the Repossessor Industry.

3. Roll Call

BSIS Policy Manager (PM), Antoine Hage, called roll at 10:03am.

Quorum was established with 8 members virtually present. *Members Darren Morgan, who represent the public, and Member Phil Chachere, who represents the Training Facilities Industry joined the meeting late.*

4. Review and Approval of Advisory Committee Meeting Minutes from February 26, 2021

Member Anton Farmby, who represents the public, motioned to approve the minutes from the July 22, 2021 meeting at 10:05am. Member Frank Huntington, who represents the Private Investigator Industry, seconded the motion. PM Hage called roll to pass the motion to approve the minutes; motion passed 8 – 0.

5. DCA Executive Update

At 10:06am, Carrie Holmes, Deputy Director (DD) of DCA's Board and Bureau Relations (BBR), provided a Departmental update and insight into BBR's role apropos the Bureau's Advisory Committee. She congratulated Leon Scroggins as the newest appointed Advisory Committee Board Member. DD Holmes thanked all committee members and Bureau staff for their hard work and dedication during the pandemic. DD Holmes states that DCA continues to look to the future by using lessons learned to identify long term efficiencies and policy changes. Currently, staff are in the office as well as teleworking. DCA is assembling a task force to help the department create a telework policy that will provide further clarity in structure for managers and staff that is expected to be finalized by next fall. DD Holmes also noted as part of California's plan to combat against the spread of Covid-19, California has implemented enhanced safety measures for

state employees and workers in healthcare settings. State employees must show proof of vaccination or be subject to regular Covid-19 testing.

DD Holmes also noted that committee members must also follow health and safety protocols if they plan to visit a DCA location or attend an in-person meeting, including the requirement to show proof of vaccination or negative test result. In-person meetings should be planned well in advance to allow DCA to coordinate these safety measures. Remote meetings are contingent on the Governor's executive orders and the state of emergency, which will be allowed until January 2022. Upon the executive order's expiration, the Bureau will be required to comply with all aspects of the Open Meetings Act¹.

DD Holmes encouraged members of the public to apply for the one vacant committee position to keep the board fully seated with diverse membership.

DD Holmes shared that DCA has been made aware of various scams affecting boards and bureaus and has shared related information on the DCA fraud alert website and social media. DD Holmes reminded the committee that 2021 is a mandatory sexual harassment prevention training year for all employees and committee members and encouraged all to complete training before the end of the calendar year. Profile information is available in the Learning Management System² (LMS), and DCA administration and employees are available to help.

Chief Andres asked if Members had any questions for DD Holmes. Seeing no questions, Chief Andres thanked DD Holmes for her attendance.

6. Bureau Chief's Introduction, Welcome Remarks, and Bureau Updates

At 10:11am, Chief Andres thanked Committee Members for their time investment and review of materials prior to the meetings. Committee Member suggestions and input are taken seriously by BSIS and minutes are reviewed to ensure that all questions are addressed. Chief Andres encouraged Members to contact her directly if their questions or concerns have not been addressed.

Chief Andres addressed the vacant position for a member from the public who cannot be a BSIS license-holding individual. She encouraged Members to reach out to share the opportunity with anyone who might be interested.

Chief Andres gave a legislative update, as several bills were signed in the last six weeks. Some will have a large impact and go into effect January 1, 2022. She

¹ <https://oag.ca.gov/open-meetings>

² https://inside.dca.ca.gov/documents/lms_guide.pdf

apologized for her lack of availability during some of these busy times but anticipates having availability to hold meetings again soon.

Chief Andres shared that telework is here to stay for the near future. BSIS staff and administrators enjoy the flexibility provided. Staff continue to work diligently while ensuring the office is safe by staggering work hours and days in the office. The office must remain open since there is a desk open to the public and still takes in paper applications for licenses. She encouraged applicants to use the online application for the most efficient processing.

Chief Andres noted that Member Chachere had joined the meeting at this point after a delay.

Member Huntington commented that he used BreEZe to renew his own PI license with a positive and speedy outcome. Chief Andres thanked him for his feedback.

Member Mark Miller, who represents the Private Patrol Operator industry, commented that he has also heard about guard cards clearing in one day. Chief Andres reiterated that the process works well when all information matches up between application and Live Scan, specifically legal name, social security number, and date of birth.

Member Brian Boeglin, who represents the Alarm Company industry, thanked Chief Andres and the BSIS staff for the partnership with the alarm industry, specifically regarding legislative issues and code clarification.

Member Chachere had a concern regarding transgender individuals, specifically the policy about what identifying documentation may be required (such as birth certificate and driver's license) to prove their change of gender and name. He expressed concern that there may be an issue for license applicants when it comes to matching records with DOJ and FBI.

Chief Andres responded that she had not come across this issue before but would research the question and address it in the future.

Chief Andres asked if there were any other questions. With no other questions from the Committee, questions and comments were opened to the public. The moderator provided instructions on how to make a public comment then opened the question and answer (Q&A) panel for public comment. Upon no response, the Q&A panel was closed by the moderator.

7. Update on the Bureau's Licensing Unit

At 10:21am, Chief Andres introduced DC-L Garcia for a licensing update.

DC-L Garcia shared an improved processing time for online applications, which now comprise 85% of initial applications and 68% of renewals. She referred Members to the *BSIS Staff Report*³ and shared additional information on processing turnaround targets and actual times from this document.

DC-L Garcia announced updates to BreEZe, including BMO 1434, which referred to a question regarding a “hard card” fingerprint question, creating unnecessary deficiencies that delayed processing times. This question was removed from all but the alarm applications. BMO 936 added contact information for BSIS to BreEZe, which allows inquires to be sent directly to BSIS instead of the general DCA line.

DC-L Garcia reminded Members that more online efficiencies are in the works pending legislative updates. One efficiency will allow for email notifications (when application is received, licensed, renewed, etc.), and to encourage licensees in the industry to input their email addresses for more efficient processing.

DC-Garcia noted that she would be conducting outreach along with Chief Andres and DC-E Stodolski at the CALSAGA⁴ annual meeting in the form of live Q&A and pre-recorded materials.

DC-Garcia then asked the membership for feedback regarding applicants being able to view deficiencies. Chief Andres clarified that BreEZe is used by so many boards and bureaus that changes and updates take a long time implement. BSIS is now putting deficiency letters on an applicant's BreEZe account to be accessed at any time, instead of sending a paper letter in the mail. Encouraging applicants to use this information on BreEZe will allow deficiencies to be resolved in a timelier manner. Chief Andres also encouraged applicants to send questions and correspondence via email, as phone calls are routed to a general DCA helpline that may not be able to help with specific subject-matter issues.

Member Miller asked if deficiency letters are available via email for all licenses.

DC-L Garcia responded that firearm permits (initial and renewals) are currently using this.

Member Miller clarified whether all applicants should be submitting email address.

³ https://www.bsis.ca.gov/about_us/agendas/20211021_handout_1.pdf

⁴ California Association of Licensed Security Agencies, Guards & Associates: <https://calsaga.org>

DC-L Garcia affirmed that email should be encouraged for all licensees, even if the efficiencies for that particular license will not be active until the future.

Member Miller shared that he has heard good feedback from applicants who have emailed BSIS directly.

DC-L Garcia clarified that typical turnaround is 24-48 hours and clarified that specific addresses are available on the website for each license type.

Member Miller inquired about the annual report for fiscal year 2020-2021.

DC-L Garcia responded that it should be available soon, as information has been submitted to DCA and is typically posted towards the end of the calendar year.

Member Boeglin asked that, due to AB 830⁵ being implemented by July 1, 2022, is there a way to request a monthly email specific to ACE applications through BreEze, with the intent being to encourage and communicate the new requirements with applicants in the alarm industry.

DC-L Garcia clarified the purpose of this request and will discuss with Chief Andres. Chief Andres shared with the membership that the alarm industry is the first to mandate online license applications, and it is her hope that other industries will follow suit.

Chief Andres asked if there were any other questions from the committee for DC-L Garcia; seeing none, questions and comments were opened to the public. The moderator provided instructions on how to make a public comment then opened the question and answer (Q&A) panel for public comment.

A request for public comment came from Edwin Torres. He asked for additional details regarding the discrepancy between the target timeframe for initial firearms applications and the actual completion timeframe based on the information presented earlier.

DC-L Garcia explained that target goal was determined prior to the assessment that became law, as the assessment must be passed for the license to be issued. The “clock” continues and does not stop regardless of the time it takes for all application steps and assessment to be completed.

⁵ To view the full text of the proposed legislation, visit
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB830

The moderator asked for additional public comment. Upon no response, the Q&A panel was closed by the moderator.

8. Update on the Bureau's Enforcement Unit

At 10:41am, the Chief introduced Deputy Chief of Enforcement (DC-E) Sam Stodolski.

DC-E Stodolski mentioned that this will be covered in detail by Chief Andres, but the implementation of SB 607⁶ will change the firearm assessment process effective January 1, 2022. This impacts Enforcement as there are currently 209 pending appeals of the assessment with the Attorney General's (AG) office. DC-E Stodolski stated that Enforcement is working with DCA legal and the AG's office on the best strategy for implementing this change and reducing the caseload.

DC-E Stodolski shared that the new special investigator is working out in the field and focused on unlicensed activity. About 10% of pending investigations are for unlicensed activity; 26% of citations issued thus far in this fiscal year have been for unlicensed activity. He is working with the policy unit to consider publishing information about unlicensed activity online so there is a public record. DC-E Stodolski reminded the membership to subscribe to the weekly email blast⁷ from Enforcement, which includes a list of all licenses suspended or revoked in the past week.

DC-E Stodolski referenced the signing of AB 229⁸, which Increases the reporting requirements for physical altercations for security guards. BSIS is looking into ways to streamline the reporting process and make it easier to submit incident reports, particularly for PPOs. BSIS is working with the BreEZe team to see if incident reports can be submitted through a form on BreEZe (similar to the complaint report process).

DC-E Stodolski opened the discussion for questions from the membership.

Member Huntington asked for a breakdown of the individual professions for the unlicensed activity data.

DC-E Stodolski does not have that information at this time but will look into providing it for the next meeting.

⁶ To view the full text of the proposed legislation, visit https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB607

⁷ Sign up to receive email notifications from the Bureau at <https://bsis.ca.gov/subscriptions.shtml>

⁸ To view the full text of the proposed legislation, visit https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB229

Member Huntington asked for a rough estimate of which licenses are involved in the majority of citations.

DC-E Stodolski responded that it is mostly security guards; for PIs, it is typically not blatant unlicensed activity but activity that needs further investigation. He also shared that all who receive a citation have an opportunity to have an informal conference with the Chief to discuss and clarify the evidence before they go into a formal appeal.

Member Chachere asked for more information about the list of unlicensed or cited companies.

DC-E Stodolski stated that BSIS is working to have the list published on the website and updated monthly. This has not progressed due to other time-sensitive projects but is a project planned for the future.

Member Boeglin noted that in his industry (alarm), there is often dual licensing required with the Contractors State License Board (CSLB). He asked if there is any cooperation between CSLB and BSIS on enforcement.

DC-E Stodolski responded that BSIS has a rapport and can share information with CSLB.

Member Boeglin asked if CSLB ever communicates with or gives “heads-up” to BSIS on unlicensed activity stings they are performing.

DC-E Stodolski said he is unable to comment on this. Chief Andres responded they do sometimes receive communication when it overlaps into the BSIS area, but not always.

Member Boeglin stated that enforcement is important to members of his industry, so there are always questions about cross-collaboration between BSIS and CSLB when it comes to enforcement.

DC-E Stodolski asked for additional questions from the membership. Seeing none, the moderator provided instructions on how to make a public comment then opened the question and answer (Q&A) panel for public comment. Upon no response, the Q&A panel was closed by the moderator.

9. Update on Legislation Impacting the Bureau and the Private Security Industries

At 10:50am, Chief Andres provided an update on relevant legislation. She thanked the Advisory Committee members, as she has contacted many of them for opinions on how pending bills will impact their jurisdiction. Their information and input have been vital to amending and vetoing bills.

A. **Assembly Bill 107 (Salas)**⁹ – Temporary license reciprocity for military.

Chief Andres stated that this does not have a significant impact on the membership.

B. **Assembly Bill 229 (Holden)**¹⁰ – Expands on use of force and incident reports, including raising fines for not providing incident reports in a timely fashion.

Chief Andres stated that this is a high-impact bill. Security guards and firearms permits will see the “use of force” definition revamped. BSIS will kick off a stakeholder group to overhaul and modernize use of force (primarily for security guards but does impact other licensees). This is the biggest overhaul in “use of force” in a while and will take some time, and BSIS is excited for this positive change.

Chief Andres shared that provisions of AB 229 go into effect in a staggered fashion. The broadened incident report requirement begins January 1, 2022. Chief Andres shared that BSIS was not receiving many reports of physical force used by security guards, and incidents were likely underreported based on anecdotal evidence. The fines for failure to report have been beefed up, and any physical altercation that a guard has with the public must be reported. She anticipates a deluge of incident reports and will have numbers to report at the next meeting.

C. **Assembly Bill 358 (Flora, Chapter 148, Statutes of 2021)**¹¹ – Allows an electrified security fence.

Chief Andres stated that this mostly impacts CSLB but bleeds into BSIS as well.

⁹ To view the full text of the proposed legislation, visit https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB107

¹⁰ To view the full text of the proposed legislation, visit https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB229

¹¹ To view the full text of the proposed legislation, visit https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB358

- D. **Assembly Bill 484 (Medina, Chapter 373, Statutes of 2021)**¹² – Alarm company operators: advertisements.

Chief Andres explained that this allows alarm company operators to put a website link on their advertisements which will lead to a website with their license information. This is a change from current law that mandates companies put license information in their advertisements.

- E. **Assembly Bill 830 (Flora, Chapter 376, Statutes of 2021)**¹³ – Requires all alarm applications to be submitted online.

Chief Andres stated that there are other pieces to this legislation, but the biggest impact is to alarm applicants who must now apply online. Updates will be provided at the next meeting.

- F. **Assembly Bill 913 (Smith, Chapter 416, Statutes of 2021)**¹⁴ – Redefines terms in the Collateral Recovery Act and allows an email of the notice seizure and inventory.

Chief Andres shared that this is a big impact bill, and many amendments went back and forth.

- G. **Senate Bill 607 (Min and Roth, Chapter 367, Statutes of 2021)**¹⁵ – Military spouse fee waiver. Requires individuals to complete firearm assessment prior to submitting a firearms permit.

Chief Andres stated that the assessment process has been a burden on the Bureau and was driving it to insolvency. The current procedure required the Bureau to first clear firearms applicants (training, fingerprints, application materials, etc.), then send for an assessment that determines judgement, restraint, and self-control needed to carry a firearm. The failure rate on this assessment is about 15% and the appeals rate is sky-high. The cost of each appeal is about \$5000, which dramatically escalated enforcement costs

¹² To view the full text of the proposed legislation, visit
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB484

¹³ To view the full text of the proposed legislation, visit
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB830

¹⁴ To view the full text of the proposed legislation, visit
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB913

¹⁵ To view the full text of the proposed legislation, visit
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB607

from \$700,000 per year to \$3 million. BSIS approached the legislature for assistance in this issue.

Chief Andres explained that the new process under SB 607 requires that the assessment be passed before applying, creating an “entrance exam” for firearm permits. BSIS is not involved in the assessment process, as they receive information directly from the vendor and will not receive applications from those who have not passed. It takes the denial for a failed assessment out of the licensing process.

After completing her overview, Chief Andres asked if the Committee had questions regarding legislation.

Member Chachere asked for clarification on the assessment process for SB 607, that it now must be completed before applying or taking firearms training.

Chief Andres confirmed that it goes into effect January 1, 2022 and is one of the reasons BSIS has been frantic in preparing for implementation. It will allow them to avoid raising fees. They are working with training facilities, sending out announcements on social media, and making updates on BreEZe. She stated that anyone applying after January 1 must first pass the assessment.

Member Chachere asked if there is an appeal process if they are denied at that stage.

Chief Andres clarified that BSIS will not yet be involved at the assessment stage, since it is a sort of entrance exam. Applicants can retake the assessment an unlimited number of times, but only twice per year to keep the integrity of the exam.

Member Chachere congratulated the Chief and the Bureau on getting this passed.

Member Miller asked about the new process at the BSIS level since the assessment is taken before application. Would BSIS generate a letter about the assessment?

Chief Andres shared that this is what the Bureau is currently working on. The assessment cost to the applicant is about \$55 and will save applicants money if they take that first prior to pursuing firearms training, which runs several hundred dollars. The bill allows 6 months after the assessment to complete the other aspects of training and license application.

Member Miller asked if it could be as simple as having a list of assessment sites on the BSIS website, and Chief Andres confirmed that this should be all that the

Bureau has to do regarding that step in the process. The plan is that results will be received from assessment facilities, not the applicant.

Member Farmby asked if there was wording within the legislation preventing BSIS from requiring the assessment first. Chief Andres confirmed that the Bureau does not dictate timing.

Member Farmby commented that this will save not only in enforcement and cost, but also in time, since the most complicated part of the process would be addressed up front.

Chief Andres confirmed that Member Farmby's interpretation was correct and should improve processing timelines.

Member Farmby shared a question and comment about AB 229. He asked if the incident report referred to a specific security officer reporting an incident.

Chief Andres commented that it referred to the officer as well as the PPO. DC-E Stodolski clarified that there are two mandates, which require the guard to report to their employer, and the employer to report to the Bureau.

Member Farmby asked if there are any changes to the reporting process that will take place due to the legislation.

Chief Andres said the definition of an incident will be broadened under AB 229. Previously an "encounter" included anything that required the police being called, a police report, or the need for medical attention. PPOs were using many wide interpretations of the rules to avoid reporting. Under the new definition, any physical contact must be reported.

Member Farmby expressed that this is good to hear. He commented that industry trainings for security officers cover the importance and responsibility to report.

Member Farmby brought up a recent concern within his constituency about an increase in interactions with 5150s (mental illness), homeless, and people not authorized to enter facilities. He reported tense situations with individuals with weapons, and thus the need to report is even more urgent.

Regarding fines, Member Farmby asked who would be responsible for fines related to reporting.

Chief Andres responded that the PPO (employer) is ultimately responsible for reporting to the Bureau and would incur any related fines, not the individual officer.

CD-E Stodolski shared that historically, there wasn't a requirement for guards to report incidents to their employer, so some employers were ignorant of incidents.

Member Farmby agrees that this legislation makes sense and was lacking in clarity previously. He offered his support and assistance, specifically regarding AB 229.

Chief Andres commented that she will be reaching out to Member Farmby prior to January 1 for assistance in spreading the word among the impacted population.

Member Chris Sayers, who represents the public, spoke up clarify whether the reporting requirement was not just for the guards but for the PPOs as well. Chief Andres confirmed that this is the case.

Member Boeglin commented that his industry has been tracking AB 358. He wanted to verify that BSIS does not consider an electrified fence a burglar alarm device, even if it is hooked up to a transmitted communication system. It would be under the jurisdiction of the CSLB, but the related communication system would be under BSIS.

Chief Andres stated they conferred with CSLB and the industry bill sponsor, and that is the understanding they reached. She will investigate clarifying this as there are some nuances within this issue.

Member Boeglin stated that since the definition of an alarm system was updated to include ancillary devices, he wanted to clarify that protection systems are not considered an ancillary device. He will connect with Chief Andres directly regarding this issue.

Member Scroggins commented that the AB 515 "trespass" bill was approved by the Assembly and Senate but vetoed by the Governor. He inquired whether BSIS gets a lot of complaints from the repossession industry on trespassing issues.

Chief Andres stated that trespassing is one of the top complaints received from consumers about repossessioners.

Member Scroggins expressed an intention to discuss this with BSIS outside of the meeting.

Member Chachere inquired about the timeframe for appealing the assessment (as referenced in SB 607).

Chief Andres explained that the appeal process will be going away effective January 1. At this time, applicants receive a letter stating that they have failed the assessment but can appeal to the Attorney General. The entire process takes 9 months – 1 year. Appeals would ultimately be denied because there was no remedy written into the legislation.

Member Chachere asked if at that point the assessment can be repeated.

Chief Andres confirmed that under current law, it can be retaken 1 year from the date of denial (including final adjudicated appeal). This creates up to a 2-year gap between applications. She encouraged anyone currently in the appeal process to hold off, as BSIS is working with legal and AG to determine their next steps once the new procedure is implemented.

Seeing no further comments from the membership, Chief Andres asked the moderator to open the question and answer (Q&A) panel for public comment. Upon no response, the Q&A panel was closed by the moderator.

10. Update on Enacted or Pending Regulations

At 11:19am, Chief Andres updated the Committee on the enacted or pending regulations.

A. Badge, Patch, and Cap Insignia Criteria - Adopting New Sections to Division 7 of Title 16 of the California Code of Regulations

Chief Andres stated that the purpose is to have uniform standards for how BSIS approves badges and patches. This has been on the back burner due to the upcoming implementation of high-impact legislation. The Bureau will be picking up this issue again after the new year.

B. Private Investigator Fee Increase (SB 385 of 2019) – Amending Section 639 of Division 7 of Title 16 of the California Code of Regulations

The Chief noted that this lines up regulatory language with statutory language. There is no change to actual fees. This is moving along and should be nearing approval.

C. Firearms Qualification Card Training – Amending Section 632 of Division 7 of Title 16 of the California Code of Regulations

Chief Andres asked Policy Manager Hage to give any update on this item.

PM Hage stated that there has been an issue with applicants submitting outdated trainings (taken more than a year prior to application). Given that renewal applications require training within the previous 4 months, the initial training must be done within 6 months of initial application. The Bureau is still working on this and the entire package will be noticed and submitted for public comment.

The Chief asked the Committee if they had any questions on the Bureau's regulations. With none raised, she asked the moderator to open it up to public comment.

The moderator provided instructions on how to make a public comment then opened the question and answer (Q&A) panel for public comment. The moderator stated no requests were received and closed the Q&A panel.

11. Public Comment on Items Not on the Agenda

At 11:23am, the Chief asked the moderator to open the meeting to public comment. She noted that the committee would not comment on any issues raised except to place items on the agenda for future meetings.

The moderator provided instructions on how to make a public comment then opened the question and answer (Q&A) panel for public comment. Upon no response, the Q&A panel was closed by the moderator.

12. Committee Members' Recommendations for Future Advisory Committee Meeting Agenda Items

At 11:24am, the Chief asked the Committee to share their concerns, questions, or comments that they would like to be included as an agenda item in a future Advisory Committee meeting.

Member Huntington would like to address Private Investigator identification cards. His constituency has been actively working with the Bureau, and as the Bureau has been working with PSI, he hopes that this can be addressed at the next committee meeting and resolved.

Member Huntington shared that he attended the Arizona Association of Private Investigators conference and discussed reciprocity. California PI licensees currently only have reciprocity with five other states. The law states that reciprocity can be established if the other state's requirements are similar to California's. His standing is to encourage reciprocity whenever possible and would like to add Arizona to the list. He has been working with PM Hage on this issue.

Chief Andres commented that her experience is that reciprocity laws are difficult to get through the California legislature in general.

Member Huntington verified that reciprocity for PIs exists, but it is up to BSIS to verify the regulations in other states.

The Chief commented that while this is the case for PIs, reciprocity does not apply to any other licenses under BSIS and is very difficult to get approved.

Member Huntington noted that this is mostly for temporary cases to be able to continue investigations across state lines, not for individual licensees relocating to California. He gave an example of theft occurring in Arizona and goods moved across state lines to California to be shipped out.

Member Boeglin commented that many states have moved away from reciprocity agreements and moved towards "endorsements." A state decides that another state's requirements are similar enough that they can endorse meeting the requirement for licensure in their state. He is highly aware of the state of this issue in other industries and invited BSIS to confer with him.

Member Boeglin revisited the comment about PI identification cards, which the alarm industry is following and considering adding to their requirements. In looking at the Bureau's website, he does not see where it is clearly stated that these cards are an optional process for most registrants.

Member Boeglin noted that while many industries use PSI for testing and assessments related to their licenses, ACEs do not. He would like to discuss whether they would be able to submit photos at another point during the process, such as with a Live Scan vendor (instead of using PSI). Chief Andres agreed that it could be discussed in the future.

Chief Andres noted that Member Darren Morgan, who represents the public, joined the meeting late, so she wanted to give him an opportunity to ask questions or weigh in on anything.

Member Morgan stated that he's been catching up and the only issue on his mind is the implications of AB 229, but time will bear that out.

Chief Andres noted that she has not heard from Member Glenn Younger, who represents the Locksmith Industry, during the meeting and wanted to check in with him about any questions or concerns.

Member Younger mentioned that the locksmith organization was recently approached by a coalition of the Bing and Duck Duck Go search engine companies, who are trying to get ahead of Section 230¹⁶ regulations on internet

¹⁶ Title 47 Section 230 of the U.S. Communications Decency Act:
[https://uscode.house.gov/view.xhtml?req=\(title:47%20section:230%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:47%20section:230%20edition:prelim))

advertising platforms. The intent is to determine criteria for who can be listed as an alarm company or a locksmith company. He stated that there are many locksmith listings in these search engines and a majority are unlicensed. He wondered if others in the membership industries would be interested in being involved in these Section 230 discussions.

Chief Andres shared an anecdote of an alarm company (unlicensed in California) that sent a solicitation to her personally through the mail. She happened to be scheduled for a call with this same company regarding unlicensed activity the next day.

Chief Andres commented that Member Younger's industry of locksmith companies does not have a state-wide association, so it is difficult to get a feel for their issues and is glad he is working on this.

Member Younger noted that these platforms currently do not bear any responsibility due to Section 230. At some point this will change so they are considered "publishers" that are responsible for their content. He will keep the membership posted on the discussion and outcome.

With no other comments, Chief Andres moved to the next agenda item.

13. Adjournment

At 11:37am, the Chief adjourned the meeting.