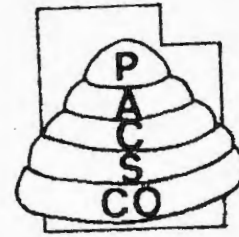


Professional Association
of Contract Security Companies
P. O. Box 504
Bountiful, UT 84011-0504
info@pacscoutah.org
www.pacscoutah.org



December 21, 2018

Ms. Jana Johansen
Bureau Manager
Department of Professional
and Occupational Licensing
160 East 300 South
Salt Lake City, UT 84155

Dear Ms. Johansen,

Re: Proposed Rules Changes

With approval of the Rules regarding training we would propose some required Continuing Education training on selected basic security topics.

Generally, most of the companies require annual training on:

Report Writing
Utah Licensing Rules
Harassment in the Workplace
Security Officer Safety
Use of Force & De-escalation of Force
CPR/ First Aid (certifications are good for 1-3 years so annual training is not required, but the officer should receive training credit as the certificates are renewed.
Security Awareness - Homeland Security/Workplace Violence

One thing not generally understood by non-security persons is that the security organizations invest heavily in security officer training. The security company provides additional training depending on the assignment. Generally this will include 8-40 hours of additional specific training for that post. As officers move to other assignments, they will receive additional training for the new post.

As always the change does not preclude a company from providing more pre-assignment training. Most of the national companies and several local companies provide 8-16 hours of additional training for new hires. We all agree more training is beneficial to the success of the security company, especially if that training is specific to the company's business/clients.

The benefit to the industry and the general public is, with this Rules change, that the individual security officer will receive specific training for his/her daily work assignment. It is a waste of training for a mobile patrol officer, for example, to be trained on telephone techniques and fixed post operations.

We are especially pleased with the proposed change in Continuing Education from 16 hours to 32 hours per renewal period. This will provide continual training for security officers which will improve their professionalism and industry knowledge.

Thank you,

R C Anderton

R. C. Anderton, CPP
Chairman



Jana Johansen <janajohansen@utah.gov>

Security officer training regulation - Public Comment

2 messages

David Anson <
To:

Fri, Dec 14, 2018 at 5:10 PM

Dear Ms. Johansen, 12/14

I am deeply concerned about the inadequate regulation for security officers which will lead to many Utahans suffering and possibly dying. The new, weaker law is dangerous. De-escalation and use of force training should be expanded in the initial training from its tiny place, and de-escalation and use of force training needs to be mandatory, not optional, in the training after serving 2 years.

I saved up money for 6 years to go to school at the U of U for 7 years to become a licensed psychologist for the last 23 years in the State of Utah. I don't carry a gun.

Please do as much as humanly possible to protect the people of Utah from the tragic outcome of inadequately trained security officers.

Thank you very much,
David Anson, Ph.D.

Jana Johansen
To: David Anson

Mon, Dec 17, 2018 at 7:25 AM

Good morning, I will add your comments to the others received.

Kind Regards,

Jana Johansen

Bureau Manager
State of Utah Department of Commerce
Division of Occupational and Professional Licensing

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[Quoted text hidden]



Jana Johansen <janajohansen@utah.gov>

Utah Security Guard Training Requirements

3 messages

Michael Clára ·

Wed, Dec 12, 2018 at 7:48 AM

To:

I cannot attend the public hearing on Thursday as I have to be at a GRAMA Appeal hearing scheduled at the same time. I ask that my comments be made part of the public record for the hearing:

I do want to submit that I am opposed to the reduction of training hours for security guards in the state of Utah.

Recent incidents would inform us that reducing the hours of training is not good public policy.

I had an incident with City Creek Security that was featured on Fox Thirteen News. I went to the mall to document that the Security Guards were harassing Latino vendors on Main St. Then they turned on me. Once mall management intervened the issue was resolved. Why did the security guards think that the behavior featured in this story is okay?

Salt Lake Vendor Claims Security at City Creek Center is Harassing Him

<https://fox13now.com/2017/10/18/salt-lake-vendor-claims-security-at-city-creek-center-is-harassing-him/>

We also have the this incident that indicates there is a lack of understanding on when deadly force can be used:

Security Guard Charged with Murder for Allegedly Shooting SLC Man in the Back

<https://fox13now.com/2018/06/26/security-guard-charged-with-murder-for-allegedly-shooting-man-in-back/>

Un abrazo,

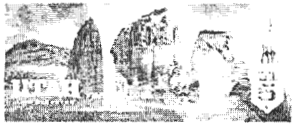
Michael Clára

M

Jana Johansen ·

Wed, Dec 12, 2018 at 7:56 AM

To:



Jana Johansen <janajohansen@utah.gov>

No reduction in security guard training

3 messages

Bob Brister

To

Tue, Dec 11, 2018 at 10:13 PM

To: Utah Division of Occupational & Professional Licensing

I am writing to object to the proposed reduction of mandatory training for security guards from 24 to 8 hours, eliminating 2/3 of the training required for a Utah Security Guard license.

Training on use of force and de-escalation techniques should continue to be a mandatory part of the guards continuing education. To reduce the training requirement is to invite tragic incidents.

Sincerely,

Bob Brister

Salt Lake City

Jana Johansen

To

Wed, Dec 12, 2018 at 7:49 AM

Good morning Mr. Brister,

I will take your comment to the Rule Hearing and mention it to the Administrative Law Judge when he asks if I have received public comments.

However, the change in initial training hours (from 24 to 8) is a legislative change that occurred in last years legislation and is located in the Practice Act. The Division and Security Board must remain neutral on legislation.

It is the duty of the Board and Division to keep the Rule up to date with the Act, which includes defining and clarifying changes. The major change to the Rule (brought about in part by the legislative education "drop") is the increase in Continuing Education training hours from 16 to 32 basic education hours required every two years for armed and unarmed guards. With armed guards taking an additional 16 hours of firearm education every two years.



Jana Johansen <janajohansen@utah.gov>

Comment on SPLACSR

1 message

Raphael Cordray

To:

Wed, Dec 12, 2018 at 9:26 PM

I am concerned about the false impression of safety given to the average person about security guards and their training. The public is being deceived given the lack of real training under the rule.

People think security guards are safe. The job title itself gives the general public a false sense of security given the lack of mandatory professional public safety training. The rule change is dangerous to everyone. Utah all ready has low standards for security guards and the enforcement of the rules is lax.

The guards need much more training than the rule provides. DOPL should be watching out for the public welfare.

I beleive Lauren McCluskey, who was killed by a man who was a security guard at a bar when she met him, initially thought he was safe because he was a security guard. DOPL should have shutdown Allied security before Lauren Mcculskey got murdered.

Raphael Cordray



Jana Johansen <janajohansen@utah.gov>

Security Officer Statistics

3 messages

PRIVATE OFFICER <

Fri, Dec 14, 2018 at 1:02 PM

Reply-To: PRIVATE OFFICER

To:

Hello Ms. Johansen:

For the past fifteen years, our International private security and law enforcement association has collected, documented and calculated data and statistics relating to the private security industry.

Through our news bureau and support staff, we have become reporting partners with OSHA, the Department of Justice, and many state and federal agencies.

I believe the following information may assist you in your decision whether or not to reduce security officer training requirements.

Here is the most current data:

In 2018 there have been-

Security Officer-Use of Force Incidents: 23,158

Security Officer Arrests: This year, 131 security officers have been charged with on duty murders (excessive use of force incidents) 687 have been charged with manslaughter, aggravated assault with a firearm or assault

Security Officer Injuries and Assaults: 17,981

Security Officer Deaths: 118- 82 were the result of gunfire

As a law enforcement officer, and owner of several private security businesses for more than forty years, I have seen the shift of assaults and murders on law enforcement expand deep into the security industry because of the change of their duties and types of clients where security is used.

Most assaults, injuries and use of force incidents occur at nightclubs/bars, residential communities including apartments and condos and during events with high public contact. This is contrary to the use of security guards in 1960-1995 when most private

security was used at industrial, manufacturing and commercial sites. Most duties there was to observe and report and involved little contact with the public.

When you look around today, most use of security officers are in public areas and areas of crime, property violations and in problem areas.

You see security on duty at malls, patrolling parks, hotels, schools, transit centers and government facilities and property. Their role on these properties are different than they were at the factory or the office building.

Many of their duties include some measure of enforcement which may include as little as issuing a trespass warning, catching a shoplifter or as major as detaining someone with drugs, or a person involved in a shooting, robbery or rape.

Much like a police officer, when a security officer confronts a person, they can quickly become a victim of an assault or worse, they can be stabbed, shot or killed.

Please read real incidents at

<https://privateofficerbreakingnews.blogspot.com/>

Currently, there are approximately twice as many private security officers as there are law enforcement.

We estimate that there are now, approximately, 1.8 million security officers nationwide.

This includes "contract" security employed through a security service, "bouncers" most are unlicensed and employed directly by a bar, nightclub, loss prevention agents, who also, are unlicensed and untrained, employed by retailers (they make over 1 million shoplifting detentions per year!) and "proprietary" security, unlicensed and untrained also employed directly by a company.

Assaults by and assaults against, security, has been going up between 11%-31% annually and is forecasted to increase even more as the use of security continues to grow.

On a final note, the median "regulatory" training nationwide for unarmed security is 24 hours. Only three states require less.

The median "regulatory" training nationwide for armed security is 32 -40 hours. Six states require much more.

The median nationwide training for a law enforcement officer is 440 hours.

Security officers need more training than ever before. Any less, would jeopardize their safety, and the safety of the general public.

Please let me know if I can be of assistance to you.

Thank you

Rick McCann | Founder-CEO | Private Officer International
Active Law Enforcement Chief/FF-EMT

Jana Johansen

Fri, Dec 14, 2018 at 1:18 PM

I will most definitely share this information with the security Board. However, the reduction of hours was a Legislative change to the Practice Act that has already taken place (in January/February) in the 2018 legislative session. We are just heading into the legislative session for 2019 and there may be changes that come about this year in relation to initial training, although I have yet to hear of any.

It is one of the duties of the Board to establish a Rule that further defines and clarifies the Practice Act. The Board is proposing with this Rule to increase the continuing education hours as a result of the initial training decrees.

Again, thank you for sharing the information. I will get it to the Board right away. I will also inform them that you are open to any questions that they might have for you.

Kind Regards,

Jana Johansen

Bureau Manager
State of Utah Department of Commerce
Division of Occupational and Professional Licensing

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[Quoted text hidden]

PRIVATE OFFICER <

Fri, Dec 14, 2018 at 1:23 PM

Reply-To

To: Jana Johansen.

Hello:

Thank you for your quick response.

We have a legislative committee that works with state legislators and local government on these issues.

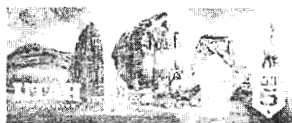
We've been successful in changing various laws in several states relating to private security, public safety and private police officers.

We would be more than happy to offer our knowledge and expertise to the legislators.

Thank you again for your response.

Rick

Rick McCann | Founder-CEO | Private Officer International
Active Law Enforcement Chief/FF-EMT



Fwd: Security guard training // Utah this is outrageous and dangerous reduction. Archetype: Authoritarian Personality.

4 messages

Sat, Dec 15, 2018 at 4:21 PM

To

File. To be cont'd?

Fwd to:

- a). Governor for, the State of Utah, Mr. Gary Herbert,
- b). Attorney General for, the State of Utah, Mr. Sean Reyes,
- c). District Attorney for, the State of Utah, Mr. Sim Gill,
- d). U.S. Attorney for. The State Of Utah. Mr. John Huber.

To: Ms. Jana Johansen,

jana.johansen@utah.gov; jana.johansen0@gmail.com

Title: Bureau Manager at State of Utah Department of Commerce, Division of Occupational and Professional Licensing (DOPL);

<https://www.linkedin.com/in/jana-johansen-35a62993>.

<http://utahgoodsam.org/State%20Staff%202018.pdf>.

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=EYIVXIGzF6jb0gLR3lvwCw&q=jana+johansen%40utah.gov&oq=jana+johansen%40utah.gov&qsl=psy-ab.12...4988.4988...6719...0.0...0.70.70.1.....0....1...qws-wiz.0YkYE_unv-U

Subject: ***Security guard training // Utah this is outrageous and dangerous reduction***

Archetype: Authoritarian Personality: Security Guard, Police Officer; Law enforcement, etc., Case in point.

Authoritarian personality; law enforcement, (generalization; conceptual).

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&biw=998&bih=675&ei=JYQVXOGVLM_L0PEPr_uLuAQ&q=

Authoritarian+personality%3B+law+enforcement&oq=Authoritarian+personality%3B+law+enforcement&qsl=psy-ab.3..33i299.869922.874256..874656.

```
..0.0..0.105.348.2|2.....0....1..qws-wiz.....0i71.Eypl2ZBpNsY
```

-----Original Message-----

ΓΟ:

Cc:

Subject: Fwd: Security guard training // Utah this is outrageous and dangerous reduction. Susanna Hope, police wife (abused; 20 yrs.):

File, Amended Copy (to be cont'd.)? Pass it on..Use my real name, should you desire (along w/my email in any way; discretion)..

Amend copy: Purpose of highlight subtitle, below.

Susanna Hope, police wife (abused; 20 yrs.). *See subtitle below (previous, message sent).

Subject:

a). Abuse of Authority.

b). Corruption.

-----Original Message-----

From: [redacted]@gmail.com>

To:

Cc:

Subject: Re: [redacted] reduction. Susanna Hope, police wife (abused):

File, (to be cont'd.)? Pass it on..Use my real name, should you desire (along w/my email in any way; discretion)..

Subject:

a). Abuse of Authority.

b). Corruption.

40% of law enforcement spouses are abused:

https://www.google.com/search?rlz=1C2WPZB_enUS657US657&safe=strict&source=hp&ei=f04VXIn1NYPR0wKC34yABQ&q=40%25+of+law+enforcement+spouses+are+abused&btnK=Google+Search&oq=40%25+of+law+enforcement+spouses+are+abused&gs_l=psy-ab.3...10453684.10478739..10479380...3.0..0.203.3643.36j5j1....2..0....1..gws-wiz.....0..0j0i131j0i22i30j33i22i29i30j33i299j33i160.d58Cu0leGew

Police Wife: The Secret Epidemic of Police Domestic Violence:

<http://msmagazine.com/blog/2015/10/26/police-wife-the-secret-epidemic-of-police-domestic-violence/>

Susanna Hope, police wife (abused; 20 yrs.):

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=GHsVXK2CLKT89AOrnLyABw&q=Susanna+Hope%2C+police+wife+%28abused%3B+20+yrs.%29%3A&oq=Susanna+Hope%2C+police+wife+%28abused%3B+20+yrs.%29%3A&gs_l=psy-ab.3..33i299.31992.38679..41984...0.0..0.100.667.8j1.....0....1..gws-wiz.....0i71.QD3zfFqeMQs

-----Original Message-----

From

To:
Cc:

schaue,

Sent: Sat, Dec 15, 2018 2:47 pm

Subject: Fwd: Security guard training // Utah this is outrageous and dangerous reduction.

File, (to be cont'd.)? Pass it on..Use my real name, should you desire (along w/my email in any way; discretion)..Law enforcement, Security, etc.. Protect corporate america (authority, they perceive as power; fascist). Military Academic Industrial Prison Complex.

Joseph James DeAngelo (former, police officer; U.S. Navy Veteran). Modus Operandi:

Subject:

- a). Abuse of Authority.
- b). Corruption.

Excerpt:

"His distinctive methods made him a suspect in 12 murders, 45 sexual assaults and more than 120 burglaries"

<https://people.com/crime/golden-state-killer-behind-investigation-arrest/> ,

*** <https://theconversation.com/the-preferred-jobs-of-serial-killers-and-psychopaths-96173> *** ,

https://www.google.com/search?q=Joseph+James+DeAngelo&rlz=1C1WPZB_enUS657US827&oq=Joseph+James+DeAngelo&aqs=chrome..69i57&sourceid=chrome&ie=UTF-8

Foot Notes:

- Documented gangs in military:

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=KHIVXOXiM-O10PEPm8y9sAQ&q=Documented+gangs+in+military&oq=Documented+gangs+in+military&gs_l=psy-ab.3...114457.116470..117087...0.0..0.94.363.5.....0....1..gws-wiz.....0i71.cXXMs-O7Nak

Military Academic Industrial Prison Complex:

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=KHUVXJ6oMIXB7gKk_rnYAAQ&q=%22Military+Academic+Industrial+Prison+Complex%22&oq=%22Military+Academic+Industrial+Prison+Complex%22&gs_l=psy-ab.3...28607.32293..36113...0.0..0.138.668.8j1.....0....1..gws-wiz.....0i30j33i10.1C6FwoJ9GhM

-----Original Message-----

From: johnniesmthj <

To:

Cc:

Sent: Sat, Dec 15, 2018 1:45 pm

Subject: Re: Security guard training // Utah this is outrageous and dangerous reduction.

File, (cont'd).

Subject:

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=nVsVXNejPIX00wK6jpD4Cw&q=Karra+Porter%2C+Attorney%3B+media&oq=Karra+Porter%2C+Attorney%3B+media&gs_l=psy-ab.3..33i160l2.3985.6463..6880...0.0..0.94.486.6.....0....1..gws-wiz.....0i22i30j33i299.Q-sdTg4tbjc

Bcc: Ms. Karra J. Porter, Attorney.

-----Original Message-----

From: johnniesmthi <

n>

To

Cc:

Sent: Fri, Dec 14, 2018 5:53 pm

Subject: Re: security guard training // Utah this is outrageous and dangerous reduction.

I tried to send this out (my server said I had to many recipients. You, may want to communicate w. R. Andrsn as well.

File (to be cont'd.)?

Draft.

Subject: "Corruption"

Fwd: To, Utah, U.S. Attorney General. Governor and Attorney General, at this time (non-threat).

To:

Ms. Johansen (professional),

<https://dopl.utah.gov/sec/index.html>

In my opinion (IMO): Law enforcement; Private security company's training and, *all* Utah Government Officials (authority; emphatic) (psychological, etc.; totality; generalization; conceptual). Is substandard to say the least (day 1 of employment). This is going to excel; litigation matters and, worse; mayhem. We need law enforcement. Do you have children; grandchildren (I do).

Note: All law enforcement; private security and, *all* Utah Government Officials (authority; emphatic). Should, be required (remedial; application process). To, submit to DNA testing. There are a few that are exceptional, none the less. Case in fact.

Example(s); several more....., As you may know.

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=dDgUXKr7JMeL0gKKtrKADA&q=alex+wubbels&oq=alex+wubbels&gs_l=psy-ab.3..0i9.667137.673183..673609...0.0..0.138.876.11j1.....0....1..gws-wiz.....0..0i131j0i67j0i131i67j0i10.UnLdy0Hu-tU

<http://tradeforpeopleandplanet.org/utah-tpp-activist-violently-arrested/>

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=fzUUXJvcObXB7gLK5LLYDg&q=utah+man+killed+by+security+guard&oq=utah+man+killed+by+security&gs_l=psy-ab.1.0.33i160.657992.669530..674547...0.0..0.150.2093.24j3.....0....1..gws-wiz.....0..0j0i67j0i131j0i131i67j0i22i30j33i22i29i30.eQeR3_1DXZo

<https://abc7ny.com/news/4-bodies-found-at-property-linked-to-ex-cop-charged-with-murder/1665326/>

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=MTkUXNi7Dley0wLfglvoDQ&q=russion+cop+serial+killer&oq=russion+cop+serial+killer&gs_l=psy-ab.3...1159269.1175548..1175972...0.0..0.142.1931.23j2.....0....1..gws-wiz.....0..0j0i67j0i131j0i131i67j0i10j0i13j0i113i30.Xvaz45Uhx5Q

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=yT0UXO-0OKaH0wKH34QQDw&q=golden+gate+cop+serial+killer&oq=golden+gate+cop+serial+killer&gs_l=psy-ab.3...46755.54130..55818...0.0..0.89.1279.18.....0....1..gws-wiz.....0i71i0i30j0i7i30j0i67j0i8i7i30j0i8i30j33i10.4SfZ5RKkFe4

https://en.wikipedia.org/wiki/Fred_Hampton (scroll down and check out the pictures)

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=lz0UXLX2Jb3E0PEP2taE2As&q=kent+state+massacre&oq=kent+state+massacre&gs_l=psy-ab.3..0i10.3370.12244..12557...0.0..0.91.1354.19.....0....1..gws-wiz.....0..0i71j0i131j0i67j0i131i67.2nrnlNrKPCw

https://www.google.com/search?q=%22who+bombed+judi+bari%22&safe=strict&rlz=1C1WPZB_enUS657US685&source=lnms&sa=X&ved=0ahUKEwiPj8qywKDfAhX4lJqIHchdBoUQ_AUICSgA&biw=998&bih=675&dpr=1.25

https://www.google.com/search?safe=strict&hl=en&authuser=0&rlz=1C1WPZB_enUS657US685&ei=mklUXPy0KJ6Bk-4Px_KplA&q=rogue+cops+oakland&oq=rogue+cops+oakland&gs_l=psy-ab.3..33i160.24990.27373..27669...0.0..0.99.620.8.....0....1..gws-wiz.....0j0i71j0i67j0i22i30.p_PWbjtT0Ls

https://www.google.com/search?safe=strict&hl=en&authuser=0&rlz=1C1WPZB_enUS657US685&ei=2T4UXP-vB46g8AO77ouQBg&q=rogue+cops&oq=rogue+cops&gs_l=psy-ab.3..0i5j0i22i30i5.2864.7223..7488...0.0..0.92.693.10.....0....1..gws-wiz.....0..0i131j0i67.94TRZkj_4Mc

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=ezkUXP-YDuGCK-4PoMWNiAl&q=Utah+ACLU+Action+on+Law+Enforcement+Abuse+of+Power.&oq=Utah+ACLU+Action+on+Law+Enforcement+Abuse+of+Power.&gs_l=psy-ab.3...11182.13293..13686...0.0..0.87.394.5.....0....1..gws-wiz.....0i71.aJ1CUTQtxmo

IMO, It is self evident (that the systematic is obsolete). Are you accountable; culpable.

Happy Holiday's, and be safe! J. Smith

~History Is A Weapon~

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=sj8UXIfgMbut0PEPwMKaqAo&q=violence+against+women&oq=violence+against+women&gs_l=psy-ab.3..0i10.1226943.1236609..1236921...0.0..0.107.1500.21j1.....0....1..gws-wiz.....0..0i71j0i67j0i131j0i10i67.160NdpT__YE

John Trudell - 33,000,000 US Prisoners By The Yr 2100

<https://www.youtube.com/watch?v=64RYcXSAPBM>

John Trudell Documentary You Tube 1

<https://www.youtube.com/watch?v=Duo0jKPFYXxM>

NOTE: Google: Means, Russell,

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US707&biw=1014&bih=690&tbm=vid&ei=tzIPXPWHAqfm0gLewafICQ&q=Means%2C+Russell+&oq=Means%2C+Russell+&gs_l=psy-ab.3..0i8i30k1i10.11703.11703.0.12046.1.1.0.0.0.84.84.1.1.0....0...1.1.64.psy-ab..0.1.84..0.77II8r1N-_M

-----Original Message-----

From:

To:

Sent: Fri, Dec 14, 2018 3:40 pm

Subject: security guard training // Utah this is outrageous and dangerous reduction.

Hello John

See below that Utah is accepting comment on a rule to reduce training requirements for private security guards in Utah. Alarminglly the rule makes continuing education in UOF and de-escalation OPTIONAL.

Obviously this is outrageous and dangerous.

See that Utah (DOPL) did yesterday delay the bad rule change.

AndTheDOPL security licensing board will take this up at a public meeting on Feb. 14, 2019 .

Importantly objections and public comment on the proposed rule will be continue to accepted UNTIL Monday 5pm.

Send comments to: janajohansen@utah.gov

I alerted the media. Only a couple outlets responded thus far.

Here is CH2 report

<https://kutv.com/news/local/state-delays-reduction-in-training-requirements-for-security-guard-licenses>

Best wishes.

Regards,

~J

-----Original Message-----

From: 'J'

To: 'John'

Sent: Fri, Dec 14, 2018 3:40 pm

Subject: security guard training // Utah this is outrageous and dangerous reduction.

Hello John

See below that Utah is accepting comment on a rule to reduce training requirements for private security guards in Utah. Alarminglly the rule makes continuing education in UOF and de-escalation OPTIONAL.

Obviously this is outrageous and dangerous.

See that Utah (DOPL) did yesterday delay the bad rule change.

AndThe DOPL security licensing board will take this up at a public meeting on Feb. 14, 2019 .

Importantly objections and public comment on the proposed rule will be continue to accepted UNTIL Monday 5pm.

Send comments to: janajohansen@utah.gov

I alerted the media. Only a couple outlets responded thus far.

Here is CH2 report

<https://kutv.com/news/local/state-delays-reduction-in-training-requirements-for-security-guard-licenses>

Best wishes.

Regards,

~L

Jana Johansen <janajohansen@utah.gov>
To: johnniesmthj@aol.com

Mon, Dec 17, 2018 at 7:24 AM

Good morning, I will add your comments to the others received.

Kind Regards,

Jana Johansen

Bureau Manager
State of Utah Department of Commerce
Division of Occupational and Professional Licensing

The information contained in this electronic mail message is confidential information intended only for the use of the individual or entity named above and may be privileged. If the reader of this message is not the intended recipient or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone(801) 530-6628 or by replying to this message. Also, please delete the original message. Thank you.

[Quoted text hidden]

Mon, Dec 17, 2018 at 10:58 AM

TO:

File:

Ms. Johansen,

Note: In your reply (which,I appreciate). It would appear that you have omitted the imminent (understatement); Premise, (context). I have merely copy and pasted it. In any potential future correspondence(s), we may have . I would appreciate it, if you could leave the original transmission text, (in it's original form).

2nd Request: Please, forward this message to the parties I have requested, originally (omission). I have "dotted lined", your omission(s), from your reply. * See previous message below. Sent to you on Sat, Dec 15, 2018 at 4:21 PM.

Sincerely, John S.

PS., Please, confirm receipt.

On Sat, Dec 15, 2018 at 4:21 PM <johnniesmithj@aol.com> wrote:
File. To be cont'd?

Fwd to:

- a). Governor for, the State of Utah, Mr. Gary Herbert,
- b). Attorney General for, the State of Utah, Mr. Sean Reyes,
- c). District Attorney for, the State of Utah, Mr. Sim Gill,
- d). U.S. Attorney for, The State Of Utah, Mr. John Huber.

To: Ms. Jana Johansen,

janajohansen@utah.gov; janajohansen0@gmail.com

Title: Bureau Manager at State of Utah Department of Commerce, Division of Occupational and Professional Licensing (DOPL);

<https://www.linkedin.com/in/jana-johansen-35a62993> ,

<http://utahgoodsam.org/State%20Staff%202018.pdf> ,

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=EYIVXIGzF6jb0gLR3IvwCw&q=jana+johansen%40utah.gov&oq=jana+johansen%40utah.gov&gs_l=psy-ab.12...4988.4988..6719...0.0..0.70.70.1.....0....1..gws-wiz.0YkYE_unv-U ,

Subject: ***Security guard training // Utah this is outrageous and dangerous reduction***

Archetype: Authoritarian Personality: Security Guard, Police Officer; Law enforcement, etc., Case in point.

Authoritarian personality; law enforcement, (generalization; conceptual),

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&biw=998&bih=675&ei=JYQVXOGVLM_L0PEPr_uLuAQ&q=Authoritarian+personality%3B+law+enforcement&oq=Authoritarian+personality%3B+law+enforcement&gs_l=psy-ab.3..33i299.869922.874256..874656..0.0..0.105.348.2j2.....0....1..gws-wiz.....0i71.Eypl2ZBpNsY

Authoritarian+personality%3B+law+enforcement&oq=Authoritarian+personality%3B+law+enforcement&gs_l=psy-ab.3..33i299.869922.874256..874656..0.0..0.105.348.2j2.....0....1..gws-wiz.....0i71.Eypl2ZBpNsY

[Quoted text hidden]

Mon, Dec 17, 2018 at 12:58 PM

To: johnniesmithj@aol.com

Cc: nlowe@

File:

Cc: Sent to:

Mr. John Saltas, Salt Lake City Weekly ,

Mr. Ben Winslow, Fox 13 ,

Mr. Lionel Trepanier ,

Bcc:

Ms. Karra J Porter, Esq.,

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US828&ei=pf8XXPfkCli6_wTGuZDgCA&q=Karra+J+Porter%3B+Nurse+Alex+Wubbels&oq=Karra+J+Porter%3B+Nurse+Alex+Wubbels&gs_l=psy-ab.3..33i299i3.11234.21065..21441...0.0..0.118.1772.16j4.....0....1..gws-wiz.....0i22i30j33i160.ApGTEc5ihEI

Nicole Lowe; "Kid's are the future",

nlowe@agutah.gov, nlowe@utah.gov,

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US828&ei=WfMXXMyOOeiU0gKKypygCQ&q=+nicole+lowe&oq=+nicole+lowe&gs_l=psy-ab.3..0i67j0i7i30j0i5j0i7i30i2j0.38948.38948..40011...0.0..0.76.76.1.....0....1..gws-wiz.NBt0pNEqm18

Subject: Security guard training // Utah this is outrageous and dangerous reduction. Archetype:
Authoritarian Law Enforcement Officer's; Security Guards..

-----Original Message-----

From:

To

-----Original Message-----
From: [redacted]
To: [redacted]
Subject: [redacted]

Sent: Mon, Dec 17, 2018 10:58 am

Subject: Fwd: Security guard training // Utah this is outrageous and dangerous reduction. Archetype: Authoritarian Personality.

File:

Ms. Johansen,

Note: In your reply (which, I appreciate). It would appear that you have omitted the imminent (understatement); Premise, (context). I have merely copy and pasted it. In any potential future correspondence(s), we may have . I would appreciate it, if you could leave the original transmission text, (in it's original form).

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On Sat, Dec 15, 2018 at 4:21 PM

File. To be cont'd?

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- b). Attorney General for, the State of Utah, Mr. Sean Reyes,
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- d). U.S. Attorney for, The State Of Utah, Mr. John Huber.

To: Ms. Jana Johansen,

janajohansen@utah.gov; janajohansen0@gmail.com

Title: Bureau Manager at State of Utah Department of Commerce, Division of Occupational and Professional Licensing (DOPL);

<https://www.linkedin.com/in/jana-johansen-35a62993> ,

<http://utahgoodsam.org/State%20Staff%202018.pdf> ,

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Authoritarian personality; law enforcement, (generalization; conceptual),

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Authoritarian+personality%3B+law+enforcement&oq=Authoritarian+personality%3B+law+enforcement&gs_l=psy-ab.3...33i299.869922.874256..874656..0.0..0.105.348.2j2.....0....1..gws-wiz.....0i71.Eypl2ZBpNsY

-----Original Message-----

From: Jana Johansen

>

To:

Sent: Mon, Dec 17, 2018 1:25 am

Subject: Re: Security guard training // Utah this is outrageous and dangerous reduction. Archetype: Authoritarian Personality.

Good morning, I will add your comments to the others received.

Kind Regards,

Jana Johansen

Bureau Manager

State of Utah Department of Commerce

Division of Occupational and Professional Licensing

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janajohansen@utah.gov; janajohansen0@gmail.com

Title: Bureau Manager at State of Utah Department of Commerce, Division of Occupational and Professional Licensing (DOPL);

<https://www.linkedin.com/in/jana-johansen-35a62993>

<http://utahgoodsam.org/State%20Staff%202018.pdf>.

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=EYIVXIGzF6jb0gLR3lwwCw&q=jana+johansen%40utah.gov&oq=jana+johansen%40utah.gov&qsl=psy-ab.12...4988.4988...6719...0.0.0.70.70.1.....0....1..gws-wiz.0YkYE_unv-U,

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Authoritarian+personality%3B+law+enforcement&oq=Authoritarian+personality%3B+law+enforcement&gs_l=psy-ab..33i299.869922.874256..874656..0.0..0.105.348.2j2.....0....1..qws-wiz.....0i71.Eypl2ZBpNsY

-----Original Message-----

From

To:

C

Sent: Sat, Dec 15, 2018 3:22 pm

Subject: Fwd: Security guard training // Utah this is outrageous and dangerous reduction. Susanna Hope, police wife (abused; 20 yrs.):

File, Amended Copy (to be cont'd.)? Pass it on..Use my real name, should you desire (along w/my email in any way; discretion)..

Amend copy: Purpose of highlight subtitle, below.

Susanna Hope, police wife (abused; 20 yrs.). *See subtitle below (previous, message sent).

Subject:

- a). Abuse of Authority.
b). Corruption.

-----Original Message-----

From:

To:

Cc:

schnaue

Sent: Sat, Dec 15, 2018 3:11 pm

Subject: Re: Security guard training // Utah this is outrageous and dangerous reduction. Susanna Hope, police wife (abused):

File, (to be cont'd.)? Pass it on..Use my real name, should you desire (along w/my email in any way; discretion)..

Subject:

a). Abuse of Authority.

b). Corruption.

40% of law enforcement spouses are abused:

https://www.google.com/search?rlz=1C2WPZB_enUS657US657&safe=strict&source=hp&ei=f04VXIn1NYPR0wKC34yABQ&q=40%25+of+law+enforcement+spouses+are+abused&btnK=Google+Search&oq=40%25+of+law+enforcement+spouses+are+abused&gs_l=psy-ab.3...10453684.10478739..10479380...3.0..0.203.3643.36j5j1....2..0....1..gws-wiz.....0..0j0i131j0i22i30j33i22i29i30j33i299j33i160.d58Cu0leGew

Police Wife: The Secret Epidemic of Police Domestic Violence:

<http://msmagazine.com/blog/2015/10/26/police-wife-the-secret-epidemic-of-police-domestic-violence/>

Susanna Hope, police wife (abused; 20 yrs.):

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=GHsVXK2CLKT89AOrmLyABw&q=Susanna+Hope%2C+police+wife+%28abused%3B+20+yrs.%29%3A&oq=Susanna+Hope%2C+police+wife+%28abused%3B+20+yrs.%29%3A&gs_l=psy-ab.3...33i299.31992.38679..41984...0.0..0.100.667.8j1.....0....1..gws-wiz.....0i71.QD3zfFqeMQs

-----Original Message-----

From: @aol.com>

To:

Cc:

Sent: Sat, Dec 15, 2018 2:47 pm

Subject: Fwd: Security guard training // Utah this is outrageous and dangerous reduction.

File, (to be cont'd.)? Pass it on..Use my real name, should you desire (along w/my email in any way; discretion)..Law enforcement, Security, etc.. Protect corporate america (authority, they perceive as power; fascist). Military Academic Industrial Prison Complex.

Joseph James DeAngelo (former, police officer; U.S. Navy Veteran). Modus Operandi:

Subject:

- a). Abuse of Authority.
- b). Corruption.

Excerpt:

"His distinctive methods made him a suspect in 12 murders, 45 sexual assaults and more than 120 burglaries"

<https://people.com/crime/golden-state-killer-behind-investigation-arrest/> ,

*** <https://theconversation.com/the-preferred-jobs-of-serial-killers-and-psychopaths-96173> *** ,

https://www.google.com/search?q=Joseph+James+DeAngelo&rlz=1C1WPZB_enUS657US827&oq=Joseph+James+DeAngelo&aqs=chrome..69i57&sourceid=chrome&ie=UTF-8

Foot Notes:

- Documented gangs in military:

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=KHIVXOXiM-O10PEPm8y9sAQ&q=Documented+gangs+in+military&oq=Documented+gangs+in+military&gs_l=psy-ab.3...114457.116470..117087...0.0..0.94.363.5.....0....1..gws-wiz.....0i71.cXXMs-O7Nak

Military Academic Industrial Prison Complex:

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=KHUVXJ6oMIXB7gKk_rnYAAQ&q=%22Military+Academic+Industrial+Prison+Complex%22&oq=%22Military+Academic+Industrial+Prison+Complex%22&gs_l=psy-ab.3...28607.32293..36113...0.0..0.138.668.8j1.....0....1..gws-wiz.....0i30j33i10.1C6FwoJ9GhM

-----Original Message-----

From: johnniesmthi <

To:

Cc:

Sent: Sat, Dec 15, 2018 1:45 pm

Subject: Re: Security guard training // Utah this is outrageous and dangerous reduction.

File, (cont'd).

Subject:

- a). Abuse of Authority.
- b). Corruption.

Mikhail Popkov, former Russian Police Officer; Modus Operandi:

Excerpt:

Over the course of nearly two decades, Mikhail Popkov murdered more than 80 young woman and girls....

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US707&biw=998&bih=675&ei=v2MVXNqVB7Wq0PEP-fOruAY&q=Mikhail+Popkov%3B+Motis+Operendi&oq=Mikhail+Popkov%3B+Motis+Operendi&gs_l=psy-ab.3..33i10i299i2.22228.36891..37204...1.0..0.96.1527.20.....0....1..gws-wiz.....0i22i30j0i13i167j33i160j33i299.6Nuc1FmLXRg ,

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US707&q=Mikhail+Popkov&stick=H4slAAAAAAAAAOOQUeLWz9U3MDSwyLXINo3SMjRQKE5NLI3KLKIUSC9NLEopVijJSCxRSCxKBUoUZSbmKGRn5uSkFhWfYuQA6SywyEs_xcgFYuZlpJcXpEA5RuXIFjm5pxiRjf_FKJeTWVyikJ-

-----Original Message-----

Cc:

Subject: Fwd: Security guard training // Utah this is outrageous and dangerous reduction.

Take Care, John S.

<http://listverse.com/2016/01/02/10-serial-killer-cops/>

19.....0....1...gws-wiz.....0i71j0i8i30j33i10.Vo8cn2Y9DeQ

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US827&ei=nVsVXNejPIX00wK6jpD4Cw&q=Karra+Porter%2C+Attorney%3B+media&oq=Karra+Porter%2C+Attorney%3B+media&gs_l=psy-ab.3..33i160l2.3985.6463..6880...0.0..0.94.486.6.....0....1..gws-wiz.....0i22i30j33i299.Q-sdTq4tbjc

-----Original Message-----

Cc:

Sent: Fri, Dec 14, 2018 5:53 pm

Subject: Re: security guard training // Utah this is outrageous and dangerous reduction.

I tried to send this out (my server said I had to many recipients. You, may want to communicate w. R. Andrsn as well.

File (to be cont'd.)?

Draft.

Subject: "Corruption"

Fwd: To, Utah, U.S. Attorney General. Governor and Attorney General, at this time (non-threat).

To:

Ms. Johansen (professional),

<https://dopl.utah.gov/sec/index.html>

In my opinion (IMO): Law enforcement; Private security company's training and, *all* Utah Government Officials (authority; emphatic) (psychological, etc.; totality; generalization; conceptual). Is substandard to say the least (day 1 of employment). This is going to excel; litigation matters and, worse; mayhem. We need law enforcement. Do you have children; grandchildren (I do).

Note: All law enforcement; private security and, *all* Utah Government Officials (authority; emphatic). Should, be required (remedial; application process). To, submit to DNA testing. There are a few that are exceptional, none the less. Case in fact.

Example(s); several more...., As you may know.

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=dDgUXKr7JMeL0gKKtrKADA&q=alex+wubbels&oq=alex+wubbels&gs_l=psy-ab.3..019.667137.673183..673609...0.0..0.138.876.11j1.....0....1..gws-wiz.....0..0i131j0i67j0i131i67j0i10.UnLdy0Hu-tU
<http://tradeforpeopleandplanet.org/utah-tpa-activist-violently-arrested/>
https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=fzUUXJvcObXB7gLK5LLYDg&q=utah+man+killed+by+security+guard&oq=utah+man+killed+by+security&gs_l=psy-ab.1.0.33i160.657992.669530..674547...0.0..0.150.2093.24j3.....0....1..gws-wiz.....0..0j0i67j0i131j0i131i67j0i22i30j33i22i29i30.eQeR3_1DXZo
<https://abc7ny.com/news/4-bodies-found-at-property-linked-to-ex-cop-charged-with-murder/1665326/>
https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=MTkUXNi7Dley0wLfglvoDQ&q=russion+cop+serial+killer&oq=russion+cop+serial+killer&gs_l=psy-ab.3...1159269.1175548..1175972...0.0..0.142.1931.23j2.....0....1..gws-wiz.....0..0j0i67j0i131j0i131i67j0i10j0i13j0i13i30.Xvaz45Uhx5Q
https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=yT0UXO-00KaH0wKH34OQDw&q=golden+gate+cop+serial+killer&oq=golden+gate+cop+serial+killer&gs_l=psy-ab.3...46755.54130..55818...0.0..0.89.1279.18.....0....1..gws-wiz.....0i7i10i30j0i7i30j0i67j0i8i7i30j0i8i30j33i10.4SfZ5RKkFe4
https://en.wikipedia.org/wiki/Fred_Hampton (scroll down and check out the pictures)
https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=lz0UXLX2Jb3E0PEP2taE2As&q=kent+state+massacre&oq=kent+state+massacre&gs_l=psy-ab.3..0i10.3370.12244..12557...0.0..0.91.1354.19.....0....1..gws-wiz.....0..0i71j0i131j0i67j0i131i67.2nnrlnrKPCw
https://www.google.com/search?q=%22who+bombed+judi+bari%22&safe=strict&rlz=1C1WPZB_enUS657US685&source=lnms&sa=X&ved=0ahUKEwiPj8qywKDFAhX4ljQIHchdBoUQ_AUICSGA&biw=998&bih=675&dpr=1.25
https://www.google.com/search?safe=strict&hl=en&authuser=0&rlz=1C1WPZB_enUS657US685&ei=mklUXPy0KJ6Bk-4Px_KpIA&q=rogue+cops+oakland&oq=rogue+cops+oakland&gs_l=psy-ab.3..33i160.24990.27373..27669...0.0..0.99.620.8.....0....1..gws-wiz.....0j0i71j0i67j0i22i30.p_PWbjtTOLs

https://www.google.com/search?safe=strict&hl=en&authuser=0&rlz=1C1WPZB_enUS657US685&ei=2T4UXP-vB46g8AO77ouQBg&q=rogue+cops&oq=rogue+cops&gs_l=psy-ab.3..0i5j0i22i30i5.2864.7223..7488...0.0..0.92.693.10.....0....1..gws-wiz.....0..0i131j0i67.94TRZkj_4Mc

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=ezkUXP-YDuGCK-4PoMWNiAI&q=Utah+ACLU+Action+on+Law+Enforcement+Abuse+of+Power.&oq=Utah+ACLU+Action+on+Law+Enforcement+Abuse+of+Power.&gs_l=psy-ab.3...11182.13293..13686...0.0..0.87.394.5.....0....1..gws-wiz.....0i71.aJ1CUTQtxmo

IMO, It is self evident (that the systematic is obsolete). Are you accountable; culpable.

Happy Holiday's, and be safe! J. Smith

~History Is A Weapon~

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US685&ei=sj8UXIfgMbut0PEPwMKaqAo&q=violence+against+women&oq=violence+against+women&gs_l=psy-ab.3..0i10.1226943.1236609..1236921...0.0..0.107.1500.21j1.....0....1..gws-wiz.....0..0i71j0i67j0i131j0i10i67.160NdpT___YE

John Trudell - 33,000,000 US Prisoners By The Yr 2100

<https://www.youtube.com/watch?v=64RYcXSAPBM>

John Trudell Documentary You Tube 1

<https://www.youtube.com/watch?v=Du0jKPFYXxM>

NOTE: Google: Means, Russell,

https://www.google.com/search?safe=strict&rlz=1C1WPZB_enUS657US707&biw=1014&bih=690&tbm=vid&ei=tzIPXPWHAqfm0gLEwafICQ&q=Means%2C+Russell+&oq=Means%2C+Russell+&gs_l=psy-ab.3..0i8i30k1i10.11703.11703.0.12046.1.1.0.0.0.84.84.1.1.0....0...1.1.64.psy-ab..0.1.84..0.77iI8r1N-_M

-----Original Message-----

From:

To:

Sent: Fri, Dec 14, 2018 3:40 pm

Subject: security guard training // Utah this is outrageous and dangerous reduction.

Hello John

See below that Utah is accepting comment on a rule to reduce training requirements for private security guards in Utah. Alarmingly the rule makes continuing education in UOF and de-escalation OPTIONAL.

Obviously this is outrageous and dangerous.

See that Utah (DOPL) did yesterday delay the bad rule change.

AndTheDOPL security licensing board will take this up at a public meeting on Feb. 14, 2019 .

Importantly objections and public comment on the proposed rule will be continue to accepted UNTIL Monday 5pm.

Send comments to: janajohansen@utah.gov

I alerted the media. Only a couple outlets responded thus far.

Here is CH2 report

<https://kutv.com/news/local/state-delays-reduction-in-training-requirements-for-security-guard-licenses>

Best wishes.

Regards,

~J

-----Original Message-----

From:

To:

Sent: Fri, Dec 14, 2018 3:40 pm

Subject: security guard training // Utah this is outrageous and dangerous reduction.

Hello John

See below that Utah is accepting comment on a rule to reduce training requirements for private security guards in Utah. Alarminglly the rule makes continuing education in UOF and de-escalation OPTIONAL.

Obviously this is outrageous and dangerous.

See that Utah (DOPL) did yesterday delay the bad rule change.

AndThe DOPL security licensing board will take this up at a public meeting on Feb. 14, 2019 .

Importantly objections and public comment on the proposed rule will be continue to accepted UNTIL Monday 5pm.

Send comments to: janajohansen@utah.gov

I alerted the media. Only a couple outlets responded thus far.

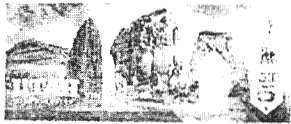
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Best wishes.

Regards,

~L



Jana Johansen <janajohansen@utah.gov>

COMMENT Re Notice of Proposed Rule DAR File 43318; SPLACSC.

3 messages

Lionel Trepanier <

Mon, Dec 17, 2018 at 4:55 PM

To: Jana Johansen

Lionel Trepanier

December 17, 2018

Jana Johansen
Bureau Manager

Re Notice of Proposed Rule DAR File 43318; SPLACSC.

Thank you for taking my first initial comment at the public hearing on December 14th.

I will not repeat those here but Jana Johansen, Bureau Manager please incorporate those additional below comments in the record.

Here I supplement those comments.

The proposal inappropriately abdicates the government's mandatory oversight function under the Act for the continuing education of private security guards in several ways.

The 32 hour requirement can be filled by "one or more" items in two long lists of topics. I see no basis, purpose or effect for distinguishing the "Core" versus "Professional" topics. The list is too inclusive to be so permissive. Quality training is not assured.

Earlier versions of Rule the the Continuing Education Topics under Rule 304 were mandatory. See DAR 34370 UT BUL 2-15-11 V 2011 No 4 P 14.

The rule proposed anticipates private guards (or employers) select a security guard continuing education instructor with a program meeting the requirements and providing certifications of Rule 304. (R156-63A-304)

The proposed Rule improvidently lacks a requirement that the continuing education instructor have relevant qualifications.

The proposed Rule improvidently lacks a requirement that the continuing education be approved or retained.

The Rule should recognize as fundamental to core professional continuing training for private security guards is mandatory and verifiable continuing training in the use of force, emphasizing the de-escalation of force, de-escalation techniques and alternatives to using force.

Thank you.

~Lionel Trepanier

Lionel Trepanier <

Mon, Dec 17, 2018 at 4:58 PM

To:

Please See I clarify the following in the former :

.. The proposed Rule improvidently lacks a requirement that the continuing education PROGRAM be approved or retained.

Regards

[Quoted text hidden]

Jana Johansen

Tue, Dec 18, 2018 at 6:50 AM

To:

Good morning Mr. Trepanier,

I will make sure that the Board sees your additional comments at their next meeting on February 14, 2019. Keep in mind, it is a public meeting and you are welcome to attend.

Kind Regards,

Jana Johansen

Bureau Manager
State of Utah Department of Commerce
Division of Occupational and Professional Licensing

X

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2/14/2019

State of Utah Mail - COMMENT Re Notice of Proposed Rule DAR File 43318; SPLACSC.

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[Quoted text hidden]



Jana Johansen <janajohansen@utah.gov>

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