

**REPORT OF THE  
VIRGINIA BOARD OF COMMERCE ON**

**The Study of the  
Establishment of a  
Private Investigator's Board**

**TO THE GOVERNOR AND  
THE GENERAL ASSEMBLY OF VIRGINIA**



**Senate Document No. 4**

**COMMONWEALTH OF VIRGINIA  
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# COMMONWEALTH of VIRGINIA

Department of Commerce

Board of Commerce

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October 27, 1987

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TO: The Honorable Gerald L. Baliles  
Governor of Virginia  
and  
The General Assembly of Virginia

The report transmitted herewith is pursuant to House Joint Resolution No. 144 of the 1987 Session of the Virginia General Assembly. Resolution No. 144 requested the Board of Commerce to study the desirability of establishing a Private Investigator's Board.

The Board of Commerce concludes that current regulatory law is sufficient to protect the public health, safety and welfare and recommends that no action be taken to enact a Private Investigator's Board.

Respectfully submitted,

  
Michael W. Cannady  
Chairman

MWC:djp

**VIRGINIA BOARD OF COMMERCE  
REPORT ON THE DESIRABILITY OF  
ESTABLISHING A PRIVATE INVESTIGATOR'S BOARD**

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I. EXECUTIVE SUMMARY

A. Study Overview

B. Key Findings

C. Conclusions

D. Recommendations

## I. EXECUTIVE SUMMARY

### A. Study Overview

Senate Joint Resolution Number 144 requests the Board of Commerce to study the desirability of establishing a regulatory board known as the Private Investigator`s Board and, if recommended, to develop proposals concerning the composition and powers and duties of the Private Investigator`s Board.

Under the provisions of Sections 54-1.7 and 54-1.26 of the Code of Virginia, this study`s focus was to protect the public health, safety and welfare through the least restrictive means.

Since 1976, private investigators have been regulated by the Department of Commerce as a part of the Private Security Services Businesses regulatory program under Chapter 17.3 of Title 54 of the Code. Firms offering private investigator services must possess a Private Security Services Business License. Employees who actually conduct private investigations must be registered, pass a background check for criminal conviction records, and within a specified time frame, pass the Compulsory Minimum Training Standards promulgated by the Virginia Department of Criminal Justice Services.

This study is very much an examination of the effectiveness of the current regulatory statute.

### B. Key Findings

1. The current statute adequately protects the public health, safety and welfare. Regulations may be revised to address public hazards which may be identified in the future.
2. Most other states regulate private investigators at the state level through an agency of the state government rather than through a board composed, at least in part, of private investigators.
3. Most licensed private investigator firms surveyed state they follow a code of ethics. Eleven private investigator professional organizations were identified. None appear to have sufficient influence to assure the public`s protection.
4. The public does not experience difficulty in locating competent private investigators.
5. No private investigator practices were identified which were, in and of themselves, detrimental to third parties or to the public health, safety and welfare.

### C. Conclusions

Five conclusions were reached as a result of the Board's study.

1. The current regulatory law is sufficient to protect the public health, safety and welfare.
2. The minimum age of eligibility for a private investigator registration should be increased from 18 to 21 years of age.
3. Some licensed private investigation firms feel that the current training standards are inadequate for their needs.
4. The current registration card is not always adequate to identify an individual as a private investigator.
5. The 120 day temporary registration allowed by statute is not appropriate for private investigators.

### D. Recommendations

The Board of Commerce makes the following recommendations:

1. That a Private Investigator's Board is not desirable and that no action should be taken to enact same.
2. Amend the regulations governing Private Security Services Businesses to raise from 18 years to 21 years the minimum eligibility age to qualify for a private investigator registration.
3. Amend the regulations governing Private Security Services Businesses to delete the provision allowing private investigator temporary registrations.
4. That the Department of Commerce develop a registration card for private investigators which clearly identifies them as "private investigators" and "private detectives."
5. That the private investigator industry create a task force to identify problems with the current training standards and cooperate with the Department of Criminal Justice Services in developing revised training regulations, if necessary.





II. INTRODUCTION

A. General Introduction

B. Purpose of Report

C. Methodology

D. Limitations of Study

## II. INTRODUCTION

### A. General Introduction

Occupational regulation in the United States began in Virginia with the regulation of the practice of medicine in 1639. There are currently twenty-nine regulatory or advisory boards regulating professions in Virginia. The Department of Commerce oversees the operations of twenty-two of these boards.

The regulation of an occupational group is a matter that merits considerable discussion and investigation prior to the establishment of any regulatory scheme. The hidden add-on costs of this type of regulation have been conservatively estimated by the United States Department of Justice and the Federal Trade Commission as being around three to five percent. The total add-on cost to consumers due to occupational regulation in Virginia is conservatively in the millions of dollars each year.

In 1974, the Virginia General Assembly established the Commission for Professional and Occupational Regulation. This Commission became the Board of Commerce in 1977. It is the legislatively mandated duty of this Board to evaluate the need for additional regulation of occupations and make recommendations to the General Assembly.

The guidelines for evaluating the need for this type of regulation were established by the General Assembly and are stated in Section 54-1.26 of the Code of Virginia. The levels of regulation and the order in which they are to be considered are as follows: (1) Private civil action and criminal prosecution, (2) Inspection, (3) Registration, (4) Certification, and (5) Licensure.

According to a recent JLARC report (1982 Senate Document 29), "Statute requires that the degrees of regulation be considered in the above order. The implication of this provision is that the least restrictive form of regulation necessary to protect the public should be employed when it is deemed appropriate to regulate an occupation."

The policy of the Commonwealth of Virginia (embodied in Section 54-1.17 of the Code of Virginia) declares that no regulation shall be imposed upon any profession or occupation except for the exclusive purpose of protecting the public. Every person has the right to engage in any lawful occupation under the Constitution of the United States and the Constitution of the Commonwealth of Virginia. Such rights may be abridged by the Commonwealth only as a reasonable exercise of its police powers for the purpose of preserving the public health, safety and welfare. Regulation may be imposed on a profession or occupation when:

1. Their unregulated practice can harm or endanger the health, safety and welfare of the public and when the potential for such harm is recognizable and not remote or dependent upon tenuous argument.
2. Their practice has inherent within it qualities peculiar to it that distinguish it from ordinary work and labor.
3. Their practice requires specialized skill or training and the public needs, and will benefit by, assurances of initial and continuing professional and occupational ability.
4. The public is not effectively protected by other means.

Since 1976, private investigators have been regulated by the Department of Commerce as a part of the Private Security Services Businesses program under Chapter 17.3 of Title 54 of the Code by the Virginia Department of Commerce. Firms offering private investigator services must possess a Private Security Services Business License. Each firm must have a Compliance Agent who has passed an examination given by the Department of Commerce testing his understanding of the statute and regulation governing private security. Before November 1984, Compliance Agents (then called Qualifying Agents) were required to meet specific education and experience requirements rather than to pass an examination. Compliance Agents, formerly Qualifying Agents, are responsible for the firm's compliance with statute and regulation. Employees who actually conduct private investigations must be registered, pass a background check for criminal conviction records and within a specified time frame, pass the Compulsory Minimum Training Standards promulgated by the Virginia Department of Criminal Justice Services.

During the 1987 session of the Virginia General Assembly, Senator Charles Colgan, Delegate Frank Medico and Delegate Harry J. Parrish were approached by Mr. Nicholas R. Beltrante, Executive Director of the Coalition of Virginia Private Investigator and Security Associations, and asked to sponsor a resolution requesting a study of the desirability of establishing a separate regulatory board to regulate private investigators. Senate Joint Resolution No. 144 requests the Board of Commerce to conduct the study and, if a Board is recommended, to develop proposals concerning the composition and powers and duties of the Board. (See Appendix A for Senate Joint Resolution No. 144)

B. Purpose of Report

Senate Joint Resolution No. 144, as it was passed by the 1987 session of the General Assembly, requests the Board of Commerce to study the desirability of establishing a regulatory board known as the Private Investigator's Board and if recommended, to develop proposals concerning the composition and powers and duties of the Board.

The purpose of this report is to summarize the findings of the Board of Commerce's study of the desirability of creating a private investigator regulatory board and transferring the regulatory authority for private investigators to the Board from the Department of Commerce as well as to make recommendations for its composition and powers and duties.

C. Methodology

This report summarizes data obtained by the Board of Commerce from written comment, a public hearing and from a number of surveys. Surveys were sent to public agencies, other states, the private security industry, service consumers and advocacy groups.

A search for hazards to the public health, safety and welfare was undertaken through surveys of commonwealth's attorneys, law enforcement agencies, consumer affairs agencies, Better Business Bureaus, trial attorneys and independent insurance adjusters, among others.

States were surveyed to learn how many regulated private investigators and the methods of regulation employed.

Licensed Private Security Services Businesses were surveyed to determine how many offered private investigator services, their view of the hazard to the public and other industry characteristics. Registered private investigators (those eligible to be employed as private investigators by licensed private security firms) were also surveyed to determine their views of the hazard to the public, the effectiveness of the training requirements and other individual characteristics.

A public hearing was held on June 5, 1987, in Richmond to solicit public comment and opinion.

D. Limitations of Study

The above was undertaken to assess the hazard to the public for the purpose of supporting a recommendation on the desirability of establishing a Private Investigator's Board. The question of the composition and powers and duties of the Board was not to be addressed unless a recommendation to create the Board was reached by the Board of Commerce.

The surveys were developed as a convenient instrument to obtain information relative to the public hazard and other industry characteristics felt to be pertinent by the Board of Commerce. No resources were available to establish the statistical reliability or validity of the surveys.

III. Key Issues

- A. Senate Joint Resolution Number 144
- B. Entry Criteria .
- C. Training Standards
- D. Eligibility Age
- E. Private Investigator Registration Cards

### III. KEY ISSUES

#### A. Senate Joint Resolution Number 144

Senate Joint Resolution Number 144 requests the Board of Commerce to study the desirability of establishing a regulatory board known as the Private Investigator's Board and, if recommended, to develop proposals concerning the composition and powers and duties of the Board.

#### B. Entry Criteria

Major concerns raised by the Coalition of Virginia Private Investigator and Security Associations, through Executive Director Nicholas R. Beltrante, were:

1. Testing for a business license is grossly inadequate.
2. Immature and unqualified persons are obtaining business licenses for private investigations.

Mr. Beltrante's coalition felt that a regulatory board, composed of members of the private investigator profession and others, could clearly view the existing problems and take corrective action that would greatly enhance the protection of the public. (See Appendix B for Mr. Beltrante's letter.)

Prior to 1984, the regulations promulgated by the Department of Commerce required those applying for a Private Security Services Business License to meet an education/experience criteria before being granted a license. That education/experience requirement was deleted from the regulations in November of 1984 as a part of the Robb Administration's regulatory reform initiative. No relationship could be found between the education/experience barrier to licensure and protection of the public.

Since 1984, the Department of Commerce has, through careful monitoring of complaint activity, found no adverse impact to the public health, safety and welfare.

#### C. Training Standards

A major concern voiced by the private investigators at the public hearing was that individuals who had passed the Compulsory Minimum Training Standards promulgated by the Department of Criminal Justice Services did not possess adequate knowledge, skills and abilities for employment by their firms.

Representatives of the Department of Criminal Justice Services present at the hearing expressed surprise as no adverse comment was received at the 1985 public hearing to adopt the current training standards.

D. Eligibility Age

The current eligibility age for private investigator registration is 18 years.

The private investigators at the public hearing expressed concern that individuals may not be sufficiently mature at that age to act competently as private investigators.

E. Private Investigator Registration Cards

The registration card currently issued to each private investigator carries the abbreviation "PID" (private investigator/detective) rather than the words "Private Investigator" and "Private Detective."

The private investigator industry expressed concern that the registration card was unprofessional in appearance and did not clearly identify them as private investigators.

The Department of Commerce has received no complaints from the public or from law enforcement agencies concerning the registration card.

IV. ANALYSIS OF INDUSTRY UNDER CURRENT VIRGINIA LAW

- A. Profile of Industry
- B. Summary of Survey of Licensed Private Security
- C. Summary of Survey of Registered Private Investigators
- D. Current Entry Requirements
- E. Recent Regulatory Review Activity



#### IV. ANALYSIS OF INDUSTRY UNDER CURRENT LAW

##### A. Profile of Industry

There are currently 360 licensed Private Security Services Businesses in Virginia. Not all of the licensed businesses offer private investigator services. Most offer guard services. Many offer both guard and private investigator services.

There are approximately 1000 registered private investigators eligible for employment by licensees.

Private investigator firms are contracted by individuals or firms requiring investigation services. Individuals are often concerned with the activities of a particular person or persons or with the circumstances surrounding an event. Either may be the subject of civil or criminal litigation. Similarly, firms may contract for private investigator services because they have no suitable investigative employees or because they need an outside party's objectivity. Some private investigation firms are highly specialized in the type of investigations they perform. Others are more generalized. Many offer their services to the public at large while some contract only with specific clients.

##### B. Survey of Licensed Private Security Businesses

One hundred forty-one (141) responses were received from the 340 surveys mailed.

Most respondents described the hazard to the public from private investigators as nonexistent (22.0%), minor (53.9%) or moderate (17.7%). Similarly, the frequency of hazard to the public was described as never (16.4%), rarely (55.0%) or occasionally (22.1%).

Of the respondents who offer private investigator services, 54.6% belong to a professional organization and 83.0% follow an established and published code of ethics.

Over half of the respondents (60.7%) felt the current training standards were inadequate to allow an individual to be successfully employed by their firm. Just over a quarter (27.7%) felt the current training was adequate. Conversely, just over half (53.2%) felt the training was adequate to protect the public and just over a third (34.2%) felt the training was inadequate to protect the public. All areas of private investigator training were cited by a significant number (over 15%) of respondents as needing more emphasis. Twenty-five (25) cited "other" training matters as needing attention. Several suggested on-the-job training and an internship.

Of the 113 respondents who do offer private investigation services in Virginia, 33 stated that private investigator services represented 100% of their business, 26 stated 5% to 25%, 18 stated 75% to 100%, 17 stated less than 5%, 11 stated 50% to 75%. Twenty-seven (27) did not respond to the question.

Just over half of the respondents who offer private investigator services (54.9%) employ two to five private investigators, 28.3% employ one and 13.3% employ five to ten. (See Appendix C for survey form)

C. Summary of Survey of Registered Private Investigators.

Four hundred fifty-six (456) responses were received from the 994 surveys mailed.

Three-fourths (76.1%) of the respondents indicated they were currently employed as a private investigator. Most (61.2%) had been employed by one agency over the past two years, and almost equal numbers had had two employers (16.7%) or no employer (18.9%).

Most described the hazard to the public from private investigators as nonexistent (33.8%), minor (42.7%) or moderate (19.8%). Similarly, most described the frequency of hazard to the public caused by private investigators as never (23.1%), rarely (50.1%) or occasionally (22.0%).

The largest number of respondents reported holding their private investigator registration for two to five years (32.3%) followed by more than five years (25.5%), one to two years (23.5%) and less than one year (18.7%). The period of time actually employed as a private investigator was reported as less than one year (30.6%), two to five years (23.6%), more than five years (23.1%), and one to two years (22.7%).

Just over half (56.9%) felt the required training was adequate to allow them to do their job. Just over one-third (154 or 34.4%) felt their training was inadequate and when asked which areas of training needed more emphasis, a significant number (more than 25%) responded to each area. The greatest number (132) felt general investigative techniques needed more emphasis followed by civil law and procedure (115), criminal law and procedure (111), collecting and reporting information (110), civil and criminal rules of evidence (105), interviewing techniques (86) and private investigator orientation (40). Seventy-nine (79) answered "other" and gave responses ranging from opinions of the current schools and training requirements to suggestions for additional or different training.

Two-thirds (66.2%) responded that their training was adequate to protect the public. Of the remainder, 18.6% felt the training was inadequate to protect the public and 11.5% were registered under the "grandfather clause" or received a training waiver and were not required to complete the training. (See Appendix D for survey form)

D. Current Entry Requirements

To qualify for a Private Security Services Business License, a firm must present evidence of a surety bond of liability insurance; employ a Compliance Agent who has passed a written examination verifying his knowledge of the regulatory law and regulations; and pass a criminal history background investigation of the ownership. Additionally, the Compliance Agent must be registered in at least one category in which the firm offers services. The Compliance Agent is responsible for the licensed firm's full compliance with statute and regulation and for keeping records adequate to document the firm's compliance. Licenses issued to firms and Compliance Agents are renewable annually.

To qualify for a registration, an individual must pass a formal course of instruction approved by the Department of Criminal Justice Services and a criminal history record background investigation. The required instruction is different for each registration specially:

Armed Guard	18 hours
Armored Car Personnel	6 hours
Courier	18 hours
Guard Dog Handler	24 hours
Private Investigator	42 hours
Unarmed Guard	12 hours

Private Investigators have the highest formal training requirement. All hours are clock hours rather than semester hours or quarter hours. Registrations are renewable biennially.

First time applicants may apply for and receive a temporary registration which will allow them to be employed in an unarmed capacity in any speciality for 120 days while they are undergoing training.

All registrants who carry firearms must first complete the firearms training required by the Department of Criminal Justice Services before a firearms certification may be issued by the Department of Commerce. Registrants must have the firearms certification in their possession when armed and complete firearms retraining biennially to maintain their firearms certification.

#### E. Recent Regulatory Review Activity

The current regulation became effective on November 1, 1986. The revision changed the method used to identify and track registrants. Before the current regulations became effective, all registrations were issued to individuals through their employing licensee. Each registration card was issued to the individual at his licensed employer's address and was valid for the entire tenure of employment.

(Employers were sent cards acknowledging receipt and acceptance of temporary registration applications.) A new application (and fee) was necessary anytime a registrant (including temporary registrants) changed employers. Approximately one-third of the applications received by the Department of Commerce were from individuals changing employers. Contact was lost when an individual ceased all private security employment. Under the revised regulations, registrations are issued directly to individuals at their home address and are renewable biennially. Temporary registrations are issued to the home address and are not renewable. The new registrations, while valid only for a specific time period, allow employment by any licensed firm.

The regulations were also revised effective November 1, 1984, under the Robb Administration's regulatory reform program. The major revision was the elimination of the education and experience requirements to qualify for a Compliance Agent License. The above mentioned written examination became the principal requirement to qualify for a Compliance Agent License.

The elimination of the Compliance Agent education and experience requirement was opposed by the industry in 1984 and was raised as an issue by the industry during the 1986 regulation adoption proceedings. Opposition to the change in employee registration method was the object of the majority of industry opposition during the 1986 revision.

#### F. Public Protection

The current regulatory program is largely peremptory in nature. The public comes into contact with employees who have met minimum training requirements and are free from serious criminal records. The exception is those employed with a temporary registration who may be in contact with the public for as long as 120 days without meeting the training requirement.

The Department of Commerce has no evidence of adverse impact on the public health, safety and welfare from the 1984 regulation revision deleting the education/experience requirement for licensure.

In March 1986, the Department of Commerce examined its complaint activity between the dates of April 1985 (five months after the effective date of the 1984 revision) and March 1986. The examination dealt with closed investigations of complaints dealing specifically with the activities and duties of Compliance Agents and was limited to complaints in which regulation violations were found. No information was found to indicate an increased hazard to the public as most of the violations were committed by Compliance Agents who had met the earlier education/experience requirement.

In April of 1987, the Department of Commerce examined the complaints against private investigators it had investigated and closed during the period of February 1985 through February 1987. Of the nine complaints examined, only one resulted in a finding of violation. That Compliance Agent had met the earlier education/experience requirement. Of the eight complaints revealing no violation, five alleged poor delivery of services, two alleged regulation violations and one alleged impersonation of a federal agent.

V. RESEARCH

- A. Methodology
- B. Summaries of Consumer Advocacy Group
- C. Summaries of Service Consumer Group Surveys
- D. Summaries of Public Agency Surveys
- E. Public Hearings
- G. Summary

V. RESEARCH

A. Methodology

Several groups were surveyed to obtain information relative to the public health, safety and welfare as well as other pertinent information.

Consumer advocacy groups (better business bureaus, consumer affairs agencies and local chambers of commerce) were surveyed to determine what problems, if any, consumers in Virginia were experiencing. Questions were also included to elicit the respondent's evaluation of the relative seriousness and frequency of hazards to the public caused by private investigators.

Service consumers (trial attorneys, insurance adjusters and security managers) were surveyed to assess the problems experienced by groups much more likely than the average citizen to have used private investigator services and, therefore, more likely to be aware of hazards to the public. Questions were asked to elicit the respondent's evaluation of the relative seriousness and frequency as well as the nature of hazards to the public caused by private investigators.

Public agencies (police chiefs, sheriffs, commonwealth's attorneys and fire marshalls) were surveyed as it was felt that the most serious of public hazards were likely to come to their attention. Questions were asked to identify the nature of problems experienced by respondents and to elicit their evaluation of the seriousness and nature of hazards to the public caused by private investigators.

Both licensed Private Security Services Businesses and registered private investigators were surveyed to obtain information concerning codes of ethics, and the industry's view of hazards to the public and adequacy of the Compulsory Minimum Training Standards.

States were surveyed to determine the nature of regulatory programs in effect elsewhere.

A public hearing was held on June 5, 1987, to receive both oral and written comment.

Additionally, the Board publicized a public comment period lasting from May 11, 1987, until June 12, 1987, for the purpose of receiving written comment from the public.

## B. Summaries of Consumer Advocacy Group Surveys

### 1. Consumer Affairs Agencies

Ten (10) responses were received from the 12 surveys mailed.

All described the problems with private investigators in their area as nonexistent (60%) or minor (40%). The frequency of problems was described as never (50%), rarely (40%) or occasionally (10%).

All responded that there were no problems with abuses by private investigators in their area. Three respondents reported one to five consumer complaints against private investigators in their area last year. The remainder reported no problems. Failure to perform services contracted for (2), failure to provide a report of investigation (2) and no license or registration (1) were the types of problems reported. One reported "false information" under other. (See Appendix E for survey form)

### 2. Better Business Bureaus

Two (2) responses were received from the four (4) surveys mailed.

One respondent described the problems with private investigators as nonexistent and one as minor. Both described the frequency of problems with private investigators as "rarely."

Neither felt there was a problem with abuses by private investigators. Neither had received any consumer complaints concerning private investigators during the past year. (See Appendix F for survey form)

### 3. Chambers of Commerce

Fifty-seven (57) responses were received from the 118 surveys mailed. Thirteen (13) respondents indicated they handled consumer complaints.

All who handled consumer complaints described the problems with private investigators in their area as nonexistent (69.2%) or minor (30.8%). The frequency of problems was described as never (66.7%) or rarely (33.3%). All responded that there were no problems with abuses by private investigators in their area.



One had received one to five consumer complaints against private investigators during the last year. The remainder had received no complaints. Failure to perform services contracted for was the consumer complaint reported. (See Appendix G for survey form)

### C. Summaries of Service Consumer Group Surveys

#### 1. Trial Attorneys

Eleven hundred (1100) responses were received from the 2,302 surveys mailed. This was the largest single group surveyed.

Slightly more than half (57.7%) indicated they had used a private investigator firm during the past five years.

Most respondents who had used private investigators described their problems with private investigators during the past five years as nonexistent (33.8%), minor (39.6%) or moderate (20.4%) and their frequency of problems as never (30.4%), rarely (36.0%) or occasionally (27.9%). Most (91.3%) have noticed no change in the nature of problems experienced since November 1, 1984 (the date that the education/experience requirement for licensure was deleted from the regulations). Of those reporting a change, 19 noted increased competency, 13 noted increased availability, 13 noted decreased competency and 8 noted decreased availability of services.

Failure to perform services contracted for (199), failure to provide a report of investigation (96), suspicious behavior (66) and annoyance/harassment/rude language or behavior (48) were the problems most frequently experienced with private investigators. "Other" problems ranging from billing and timely performance to inept, unethical and unlawful investigative methods were reported by 177 respondents. (See Appendix H for survey form)

#### 2. Independent Insurance Adjusters

Eighteen (18) responses were received from the 36 surveys mailed.

Exactly half (9) of the respondents had used private investigator services during the past five years and half had not.

All respondents who had used private investigators described their problems with private investigators during the past five years as nonexistent (22.2%) or minor (77.8%). All described their frequency of problems with private investigators during the same time period as never (11.1%), rarely (66.7%) or occasionally (22.2%).

Failure to perform services contracted for (3), failure to provide a report of investigation (2) and annoyance/harassment/rude language or behavior (1) were the types of problems reported. Four (4) "other" problems were reported. All concerned slowness in completing assignments.

Most respondents (77.8%) had noticed no change in the nature of problems experienced since November 1, 1984 (the date that the education/experience requirements were deleted from the regulations). Of those who did notice changes, one indicated an increase in competency and one indicated "more professional." (See Appendix I for survey form)

### 3. Security Managers

One hundred thirty-four (134) responses were received from the 241 surveys mailed.

Most respondents (73.1%) indicated they had not used private investigator services during the past five years. Of those who had used private investigator services, most described their problems as nonexistent (42.9%) or minor (40.0%). A few (11.4%) described their problems as severe. Most described their frequency of problems as never (40.0%), rarely (31.4%) or occasionally (22.9%).

Failure to perform services contracted for (9), annoyance/harassment/rude language or behavior (3), suspicious behavior (3) and no private investigator license or registration (1) were the types of problems experienced. Nine (9) respondents cited other problems relative to the quality of service.

Most respondents (92.0%) had noticed no change in the nature of problems experienced since November 1, 1984, (the date that the education/experience requirements were deleted from the regulations). Of those who did notice a change, one indicated an increase in competency and one an increase in availability. (See Appendix J for survey form)

## D. Summaries of Public Agency Surveys

### 1. Fire Marshalls

Sixteen (16) responses were received from the 25 surveys mailed.

Most respondents indicated they never (68.8%) or rarely (25.0%) found private investigators in situations which would cause a threat to the public. Similarly, most described the hazard to the public as nonexistent (36.4%) or minor (63.6%).

Eleven (11) (68.8%) do not encounter private investigators and four (25.0%) rated their performance as adequate. (See Appendix K for survey form)

## 2. Sheriffs

Eighty-six (86) responses were received from the 125 surveys mailed. Most respondents (68) were the principal law enforcement agency in their jurisdiction.

Most respondents indicated they never (39.8%), rarely (36.1%) or occasionally (22.9%) found private investigators in situations which would cause a threat to the public. Similarly, most described the hazard to the public as nonexistent (31.6%), minor (41.8%) or moderate (24.1%). Most had received none (46.3%) or 1 to 5 (48.8%) citizen complaints during the past two years. Most also indicated that none (94.7%) had been convicted of criminal offenses during the past two years.

Twenty-six (26) (32.9%) do not encounter private investigators, 25 (31.6%) rated their performance as adequate and 16 (20.3%) rated performance as inadequate.

Annoyance/harassment/rude language or behavior (26) and suspicious behavior (34) were the citizen complaints most received. Six criminal convictions were reported ranging from trespass to grand larceny. (See Appendix L for survey form)

## 3. Commonwealth's Attorneys

Seventy-one (71) responses were received from the 131 surveys mailed.

Most respondents indicated they never (45.7%), rarely (37.1%) or occasionally (15.7%) found private investigators in situations which would cause a threat to the public. Similarly, most described the hazard to the public as nonexistent (33.3%), minor (43.5%) or moderate (21.7%). Most had received none (64.3%) or 1 to 5 (30.0%) citizen complaints during the past two years. Most also indicated that none (95.7%) had been convicted of criminal offenses during the past two years.

Twenty-six (26) respondents (36.6%) did not encounter private investigators, and an equal numbers rated the performance of those they did encounter as adequate. Nine (12.7%) rated performance as inadequate.

Annoyance/harassment/rude language or behavior (20) and suspicious behavior (13) were the citizen complaints most received. Four (4) total criminal convictions were reported (trespass, assault, larceny and attempted extortion). (See Appendix M for survey form)

#### 4. Chiefs of Police

One hundred and ten (110) responses were received from the 207 surveys mailed.

Most responses indicated they never (27.4%), rarely (51.9%) or occasionally (18.9%) found private investigators in situations which would cause a threat to the public. Similarly, most described the hazard to the public as nonexistent (17.9%), minor (61.3%) or moderate (18.9%). Most had received none (52.3%) or 1 to 5 (37.4%) citizen complaints during the past two years. Most also indicated that none (90.7%) had been convicted of criminal offenses during the past two years.

Forty-three (43) (39.1%) respondents do not encounter private investigators, 38 (34.5%) rated their performance as adequate and 16 (14.5%) rated their performance as inadequate.

Annoyance/harassment/rude language or behavior (27) and suspicious behavior (37) were the citizen complaints most received. Sixteen (16) criminal convictions were reported ranging from trespass to grand larceny. (See Appendix N for survey form)

#### E. Public Hearing

Seventeen (17) individuals appeared and provided information. Two (2) were representatives of the Virginia Department of Criminal Justice Services and the remainder were private investigators. No members of the public testified.

The private investigators present voiced support for a Private Investigator's Board or for a board to regulate all private security services. Some, who supported a Private Investigator's Board, were very strongly opposed to a private security services board. Inadequate entry criteria and inadequate training requirements were cited as hazards to the public health, safety and welfare, and as rationale for creating a board.

The deletion in 1984 of the education and/or experience entry requirements by the Department of Commerce from its regulations and the "open book" private security law and regulation examination entry requirement, which replaced it, drew the most criticism.

Concern was expressed for the damage caused to the profession's image by eighteen-year-olds who held private security business licenses but lacked the necessary professional skill and experience.

F. Written Comment

The majority of the written comment was from the private security industry and favored creation of a Private Investigator's Board. Some suggested the Board should regulate the entire private security industry rather than be limited to just private investigators. Concern was expressed for continued or increased professionalism through more strict licensing criteria, training standards and professional conduct standards.

One industry representative expressed opposition and suggested an overhaul of the current regulatory program.

One police chief expressed support for the purpose of bringing private investigators up to the same high standards as law enforcement officers.

One attorney expressed opposition as he felt the costs would force private investigators to close their businesses.

One member of the public described a problem she had experienced with three unlicensed private investigators.

G. Summary

None of the information received documented a hazard to the public health, safety or welfare which was not addressed by current law. The only public comment received from a member of the public at large concerned unlicensed activity, a matter which is under the jurisdiction of local law enforcement and which would not be under the jurisdiction of a board.

Most of the public comment was received from the private investigator industry. The industry expressed concern over the impact on their professional image of the recent license entry requirement changes, the minimum age for registration, the training standards and the registration card issued by the Department.

VI. Other States

A. Survey of Secretaries of State

B. Summary of Survey Results

VI. Other States

A. Surveys of Secretaries of State

Each Secretary of State was asked to provide information concerning the regulation of private investigators in their jurisdiction.

Questions were asked to determine how many states regulated private investigators on the state level rather than the local level and how many were administered by a state agency rather than a regulatory board composed, at least in part, of licensees. Questions relative to license qualification and training standards were also included.

B. Summary of Survey Results

Forty-one (41) responses were received from the 53 survey forms mailed.

Most respondents (26 or 63.4%) indicated that private investigators were regulated by the state government. An almost equal number of responses indicated regulation by local government (7 or 17.1%) and not regulated (8 or 19.5%).

Regulation promulgation and disciplinary action authority is vested in an agency of the state government (22 states) rather than a board composed at least in part of practicing private investigators (5 states) in most states. The Virgin Islands responded "other" on the survey form in response to this question and provided the name of a territorial government agency and, therefore, was included on the "agency of state government" list. Minnesota is included on both lists as they responded that both a "board or commission" and an "agency of state government" regulated private investigators.

Most states responding require a minimum of education/experience to qualify for a license (9 states) or both minimum education/experience and an examination (7 states) to qualify. Few require only an examination establishing knowledge of regulatory law and regulation (3 states). Three (3) states make neither requirement.

Most states responding require employees to have an individual license (18 states). Four (4) require employees to pass state mandated training and eight require previous occupation related training or experience to qualify for an individual license or registration. All require a criminal history records check.

VII. SUMMARY

A. Findings

B. Conclusions



VII. SUMMARY

A. Findings

1. **Whether the practitioner performs a service for individuals involving a hazard to the public health, safety or welfare, if unregulated.**

Practitioners are currently regulated by statute and regulations promulgated under the statute which require firms offering private investigator services to be licensed by the Department of Commerce. Criminal history checks and minimum training are required for individuals actually conducting private investigations. No unaddressed recognizable hazard was documented by the surveys or public comment.

2. **The view of a substantial portion of the people who do not practice the particular profession, trade or occupation.**

Surveys of public agencies, service consumers and consumer advocacy groups, as well as comment from the public, revealed no evidence of a hazard to the public.

3. **The number of states which have regulatory provisions similar to those proposed.**

Most of the states responding to the survey have a statute regulating private investigators at the state level. The vast majority of those states vest the authority to promulgate regulations and take disciplinary actions against licensees in an agency of state government rather than in a board or commission composed, at least in part, of private investigators.

4. **Whether there is sufficient demand for the service for which there is no substitute not likewise regulated and this service is required by a substantial portion of the population.**

Private investigation requires knowledge, skills and abilities similar to those required for law enforcement investigative personnel. No regulated substitute could be identified.

No evidence was found to suggest that private investigator services were required by a substantial portion of the population.

5. **Whether the profession, trade or occupation requires high standards of public responsibility, character and performance of each individual engaged in the profession, trade or occupation, as evidenced by established and published codes of ethics.**

Most of the licensed private investigator firms answering the survey stated they follow an established and published code of ethics.

6. **Whether the profession, trade or occupation requires such skill that the public generally is not qualified to select a competent practitioner without some assurance that he has met minimum qualifications.**

Compulsory minimum training standards for private investigators have been promulgated under the current statute by the Department of Criminal Justice Services for the purpose of assuring a minimum level of competency. The training standards have been and may in the future be revised as necessary to assure a minimum competency level among practitioners.

The survey of consumer advocacy groups revealed no evidence of difficulty on the part of the public in locating competent practitioners.

7. **Whether the professional, trade or occupational associations do not adequately protect the public from incompetent, unscrupulous or irresponsible members of the profession, trade or occupation.**

The public has been protected by a regulatory statute since 1976. Eleven professional organizations were identified by the survey of licensees. None appear to have a substantial percentage of licensees as members and, therefore, do not appear to have sufficient influence to protect the public.

8. **Whether current laws which pertain to public health, safety and welfare generally are ineffective or inadequate.**

The current law and regulations require private investigators to meet certain standards before becoming licensed or registered. Criminal penalties and administrative action to remove licenses are provided for those who fail to comply.

The one written comment received from the public described a problem she experienced with three unlicensed private investigators. Her problem could have been addressed under current law, had she complained. Her complaint would not have fallen under the jurisdiction of a regulatory board if one had been in existence at the time.

No evidence of a public hazard left unaddressed by the current regulatory law was documented.

9. **Whether the characteristics of the profession, trade or occupation make it impractical or impossible to prohibit those practices of the profession, trade or occupation which are detrimental to the public health, safety and welfare.**

No private investigator practices were identified which were, in and of themselves, detrimental to the public health, safety and welfare. The current statute provides authority to the Department of Commerce and the Department of Criminal Justice Services to promulgate regulations to address situations detrimental to the public health, safety and welfare which may be identified in the future.

10. **Whether the practitioner performs a service for others which may have a detrimental effect on third parties relying on the expert knowledge of the practitioner.**

The surveys of consumer advocacy groups revealed no evidence of hazard to third parties. The current statute provides authority for both the Department of Commerce and the Department of Criminal Justice Services to promulgate regulations to address third party hazards should they be identified in the future.

#### B. Conclusions

After evaluating the research, the following conclusion can be made with regard to the desirability of establishing a regulatory board known as the Private Investigator's Board:

1. The current regulatory law is sufficient to protect the public health, safety and welfare.
2. The minimum age of eligibility for a private investigator registration should be increased from 18 to 21 years of age.
3. Some licensed private investigation firms feel that the Compulsory Minimum Training Standards promulgated by the Department of Criminal Justice Services do not impart knowledge, skills and abilities adequate for their needs.
4. The registration card issued to private investigators by the Department of Commerce is not always adequate to identify the registrant as a private investigator.
5. The 120 day temporary registration, which the statute allows the Department to issue to individuals allowing employment before completing training, is not appropriate for private investigators given the specialized knowledge required.

VIII. RECOMMENDATIONS AND ALTERNATIVES

- A. Regulation Changes
- B. Other Changes
- C. Board of Commerce Recommendations

## VIII. RECOMMENDATIONS AND ALTERNATIVES

### A. Regulation Changes

Regulation changes are recommended to create or amend regulations governing a profession, trade or occupation where specific statutory authority has been granted therefore. The following regulation changes could be recommended in order to address existing problems.

1. Amend the Department of Commerce Regulations governing private security businesses to establish 21 years as the minimum age of eligibility for a private investigator registration.
2. Amend the Department of Commerce Regulations governing private security businesses to delete the provision allowing private investigators to have temporary registrations.

#### PROS:

1. Amending the minimum age through regulation rather than statute may be less costly to the taxpayer as the cost of regulation revision is borne by licensees.
2. Eliminating temporary registrations would assure the public's protection by allowing only those who have completed the Compulsory Minimum Training Standards to practice as private investigators.

#### CONS:

1. Those under 21 years who already possess a private investigator registration could lose same unless a "grandfather clause" provision is included.
2. Department of Commerce regulations did not allow private investigator temporary regulations from 1981 to 1984. The provision was reinstated in the regulations in 1984 because there was not evidence of enhanced public protection to justify continuing a restrictive regulation.

### B. Other Changes

Other changes are recommended to address concerns with insufficient public protection impact to justify statutory or regulation changes. The following changes could be recommended in order to address existing problems.

### C. Board of Commerce Recommendations

The Board of Commerce appreciates the private investigator industry's concern for a high level of professionalism. However, it is the conclusion of the Board that the creation of a Private Investigator's Board would result in increased cost to those licensed, that the public health, safety and welfare is protected by the current regulatory law and that, therefore, the creation of a Private Investigator's Board is not desirable.

The Board of Commerce notes the concerns expressed by the private investigator industry that the registration card issued by the Department of Commerce is not adequate and that the minimum age of eligibility for a private investigator registration is too young. It is the conclusion of the Board that the private investigator registration card should contain the words "private investigator" and "private detective" and that the minimum eligibility age for private investigator registrations should be raised from 18 years to 21 years.

The Board of Commerce recognizes that specialized training is necessary to qualify an individual to competently perform the duties of a private investigator. It is the conclusion of the Board that private investigators should not be granted temporary registrations.

Finally, the Board of Commerce appreciates the private investigator industry's concern for appropriate training. It is the conclusion of the Board that the current training requirements are adequate to protect the public health, safety and welfare and that the Department of Criminal Justice Services has the statutory authority to address through a regulation revision any hazard identified in the future.

Therefore, the Board of Commerce makes the following recommendations:

1. That a Private Investigator's Board is not desirable and that no action should be taken to enact same.
2. Amend the regulations governing private security services businesses to raise from 18 years to 21 years the minimum eligibility age to qualify for a private investigator registration.
3. Amend the regulations governing private security services businesses to delete the provision allowing private investigator temporary registrations.
4. That the Department of Commerce develop a registration card for private investigators which clearly identifies them as "private investigators" or "private detectives."

5. That the private investigator industry create a task force to identify problems with the current training standards and cooperate with the Department of Criminal Justice Services in developing revised training regulations, if necessary.

APPENDIX A  
1987 SESSION

LD9093111

SENATE JOINT RESOLUTION NO. 144

Offered January 27, 1987

Requesting the Board of Commerce to study the establishment of a Private Investigator's Board.

Patrons—Colgan; Delegates: Medico and Parrish

Referred to the Committee on Rules

WHEREAS, private investigators are often employed to obtain information on crimes or civil wrongs, locate and recover stolen property and determine the cause of accidents, fires or injuries to persons or property; and

WHEREAS, private investigators are regulated by the Department of Commerce, but unlike most other professions regulated by the Department of Commerce, private investigators do not have a regulatory board; and

WHEREAS, a regulatory board would be composed both of persons engaged in or familiar with the field of private investigation as well as citizen members; and

WHEREAS, a regulatory board would oversee the licensing, testing and disciplining of private investigators; and

WHEREAS, private investigators perform a valuable service to the public and it is in the public interest to ensure that private investigators perform their duties in a competent and safe manner; now, therefore, be it

RESOLVED by the Senate, the House of Delegates concurring, That the Board of Commerce is requested to study the desirability of establishing a regulatory board known as the Private Investigator's Board and if recommended, to develop proposals concerning the composition and powers and duties of the Board.

The Board shall complete its work prior to November 15, 1987, and report its findings soon thereafter.

Official Use By Clerks

Agreed to By The Senate  
without amendment   
with amendment   
substitute   
substitute w/amdt

Agreed to By  
The House of Delegates  
without amendment   
with amendment   
substitute   
substitute w/amdt

Date: \_\_\_\_\_

Date: \_\_\_\_\_

Clerk of the Senate

Clerk of the House of Delegates



APPENDIX B

BELTRANTE & ASSOCIATES

A PROFESSIONAL CORPORATION

NICHOLAS R. BELTRANTE, CII

DIRECTOR

(703) 360-4848

CABLE ADDRESS  
"SLEUTH"

TELEX NUMBER  
899410

REFER TO FILE NUMBER

VIRGINIA OFFICE  
P. O. BOX 7600  
ALEXANDRIA, VIRGINIA 22307  
WASHINGTON, D. C. OFFICE  
P. O. BOX 75600  
WASHINGTON, D. C. 20013  
U. S. A.  
PLEASE REPLY TO

DOC

March 17, 1987

Alexandria, VA

Mr. David E. Dick  
Assistant Director  
Commonwealth of Virginia  
Department of Commerce  
3600 West Broad Street  
Richmond, Virginia 23230-4917

Dear David:

Pursuant to your recent request, I wish to provide you with the following data that I hope will be of some help. Hopefully, I will be better prepared on the next occasion when the BOC will require additional data.

COMMENTS REGARDING THE ESTABLISHMENT  
OF A PRIVATE INVESTIGATOR'S BOARD

I believe the study should be aimed toward improving the standards of private investigators for the added protection of the public.

Such improved standards will also serve to:

1. Greatly reduce, or eliminate, the liability risk of the state.
2. Improve the quality of performance and the work product of private investigators for the benefit of the citizenry and the profession.

Furthermore, the study should examine the initial standards established for private investigators (1976) and compare them with the present standards in Virginia.....and examine the current national trend for standards in the profession.

Sources of information should include input from long-established and licensed/registered private investigators from Virginia; from local, state, national and international private investigative trade associations; and from recognized research projects such as The Rand Report (1972) and The Hallcrest Report (1985) that resulted from federal funding.

It would appear a Private Investigator's Board with "a sole responsibility" can more effectively oversee training, testing, licensing, regulating and diciplining within the profession.

It is my opinion there is a serious hazard to the public in continuing the current DOC oversight of the profession, in that:

1. Testing for a business licensẽẽis grossly inadequate.
2. Immature and unqualified persons are obtaining business licenses for private investigations.

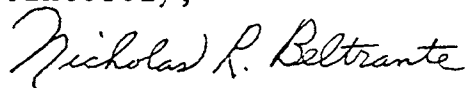
A Board comprised of members of the profession, and others, could clearly view the existing problems.....and take corrective action to insure professional standards that would greatly enhance the protection of the public.

I would suggest that members of the profession and representatives of public law enforcement be queried to establish there is a clearly recognizable harm to the public from persons not qualified to practice private investigations.

SJR 144 through the establishment of a Private Investigator's Board will provide a structure for training, testing, licensing & regulation from within the professsion. This will eliminate the need for the DOC to oversee private investigators, and thus enable it to concentrate its efforts on the over 8,000 persons engaged in the various segments of private security.

In conclusion, I would advocate the establishment of the Private Investigator's Board that would exclusively and solely oversee the 864 registered private investigators in Virginia. Such control over the profession would undoubtedly improve the competency and integrity of private investigators and add greatly to the protection of the public.

Sincerely,



Nicholas R. Beltrante CII  
Director

NRB:smb

APPENDIX C

Private Investigator`s Board Study  
Survey of Licensed Private Security Services Businesses

Please return no later than June 26, 1987, in the addressed/stamped envelope provided.

1. How would you describe the hazard to the public from Private Investigators?
  1.  Nonexistent
  2.  Minor
  3.  Moderate
  4.  Severe
  5.  Very Severe
  
2. How would you describe the frequency of hazards to the public from Private Investigators?
  1.  Never
  2.  Rarely
  3.  Occasionally
  4.  Regularly
  5.  Continuously
  
3. Do you offer Private Investigator Services in Virginia?
  1.  Yes
  2.  No

If you answered "No" to question three above, you need not proceed further. Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

4. Approximately what percentage of your business is involved in providing Private Investigator services?
  1.  Less than 5%
  2.  5% to 25%
  3.  25% to 50%
  4.  50% to 75%
  5.  75% to 100%
  6.  100%
  
5. How many Registered Private Investigators do you employ?
  1.  One
  2.  2 to 5
  3.  5 to 10
  4.  10 to 25
  5.  More than 25

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PIBS-A

6. Are you a member of any professional organization?

- 1.  Yes
- 2.  No

7. If yes, to which organization(s) do you belong?

- 1.  Professional Investigators Security Association (PISA)
- 2.  Private Investigator`s Association of Virginia, Inc. (PIA)
- 3.  The American Society of Industrial Security (ASIS)
- 4.  Committee of National Security Companies (CONSCO)
- 5.  The Virginia Security Association (VSA)
- 6.  Other, please specify and include the organization`s mailing address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. Do you follow an established and published code of ethics?

- 1.  Yes
- 2.  No

9. If yes, which organization published your code of ethics?

- 1.  Professional Investigators Security Association (PISA)
- 2.  Private Investigator`s Association of Virginia, Inc. (PIA)
- 3.  The American Society of Industrial Security (ASIS)
- 4.  Committee of National Security Companies (CONSCO)
- 5.  The Virginia Security Association (VSA)
- 6.  Other, please specify \_\_\_\_\_  
\_\_\_\_\_

10. Does the private investigator training currently required to qualify for a Private Investigator Registration, by itself, give an individual the knowledge, skills and abilities to be successfully employed by your firm?

- 1.  Yes
- 2.  No
- 3.  No Opinion

11. If no, please place an "X" next to the area(s) of training which you believe need more emphasis.

- 1.  Private Investigator Orientation
- 2.  General Investigative Techniques
- 3.  Interviewing Techniques
- 4.  Criminal Law and Procedure
- 5.  Civil Law and Procedure
- 6.  Civil and Criminal Rules of Evidence
- 7.  Collecting and reporting Information
- 8.  Other, please specify \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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12. Is the currently required private investigator training, by itself, adequate to protect the public?

1.  Yes
2.  No
3.  No Opinion

Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

If the addressed/stamped envelope is missing, please return to:

Commonwealth of Virginia  
Department of Commerce  
Private Security Services  
3600 West Broad Street  
Richmond, VA 23230

PIBS-A

APPENDIX D

Private Investigator`s Board Study  
Survey of Registered Private Investigators

**Please return no later than June 26, 1987, in the addressed/stamped envelope provided.**

1. Are you currently employed as a Private Investigator by a Virginia licensed private security services business?
  1.  Yes
  2.  No
  
2. How many different private investigator agencies have you worked for in the past two years?
  1.  None
  2.  One
  3.  Two
  4.  3 to 5
  5.  More than 5
  
3. How would you describe the hazard to the public from Private Investigators?
  1.  Nonexistent
  2.  Minor
  3.  Moderate
  4.  Severe
  5.  Very Severe
  
4. How would you describe the frequency of hazards to the public from Private Investigators?
  1.  Never
  2.  Rarely
  3.  Occasionally
  4.  Regularly
  5.  Continuously
  
5. How long have you held your Private Investigator Registration?
  1.  Less than one year
  2.  1 to 2 years
  3.  2 to 5 years
  4.  More than 5 years
  
6. Of that period of time, how long have you worked as a Private Investigator?
  1.  Less than one year
  2.  1 to 2 years
  3.  2 to 5 years
  4.  More than 5 years

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PIBS-F

7. Is the private investigator training you were required to take adequate to allow you to do your job?
1.  Yes
  2.  No
  3.  No Opinion
8. If no, please place an "X" next to the area(s) of training which you believe need more emphasis.
1.  Private Investigator Orientation
  2.  General Investigative Techniques
  3.  Interviewing Techniques
  4.  Criminal Law and Procedure
  5.  Civil Law and Procedure
  6.  Civil and Criminal Rules of Evidence
  7.  Collecting and Reporting Information
  8.  Other, please specify \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
9. Is the private investigator training you were required to take to qualify for your registration adequate to protect the public?
1.  Yes
  2.  No
  3.  No Opinion
  4.  I was registered under the "Grandfather Clause" or received a training waiver and have not received the training.

Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

If the addressed/stamped envelope is missing, please return to:

Commonwealth of Virginia  
 Department of Commerce  
 Private Security Services  
 3600 West Broad Street  
 Richmond, VA 23230

PIBS-F

APPENDIX E

Survey of Consumer Affairs Agencies  
Private Investigator`s Board Study  
Survey of Advocacy Groups

Please return no later than June 26, 1987, in the addressed/stamped envelope provided.

1. How would you describe the problems with Private Investigators in your area?
  1. \_\_\_\_\_ Nonexistent
  2. \_\_\_\_\_ Minor
  3. \_\_\_\_\_ Moderate
  4. \_\_\_\_\_ Severe
  5. \_\_\_\_\_ Very Severe
  
2. How would you describe the frequency of problems with Private Investigators in your area?
  1. \_\_\_\_\_ Never
  2. \_\_\_\_\_ Rarely
  3. \_\_\_\_\_ Occasionally
  4. \_\_\_\_\_ Regularly
  5. \_\_\_\_\_ Continuously
  
3. Do you feel that there is a problem with abuses by Private Investigators in your area?
  1. \_\_\_\_\_ Yes
  2. \_\_\_\_\_ No
  
4. Please estimate the total number of all types of consumer complaints your agency handles each year.
  1. \_\_\_\_\_ None
  2. \_\_\_\_\_ 1 to 5
  3. \_\_\_\_\_ 5 to 10
  4. \_\_\_\_\_ 10 to 25
  5. \_\_\_\_\_ 25 to 50
  6. \_\_\_\_\_ more than 50
  
5. Please provide the total number of consumer complaints against Private Investigators you received last year.
  1. \_\_\_\_\_ None
  2. \_\_\_\_\_ 1 to 5
  3. \_\_\_\_\_ 5 to 10
  4. \_\_\_\_\_ 10 to 25
  5. \_\_\_\_\_ 25 to 50
  6. \_\_\_\_\_ more than 50
  
6. Please indicate the types of consumer complaints made against Private Investigators and provide the number of each type received last year.

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PIBS-C  
CONS AFF



- A. Annoyance/Harassment/Rude language or behavior:
1. \_\_\_\_\_ None
  2. \_\_\_\_\_ 1 to 5
  3. \_\_\_\_\_ 5 to 10
  4. \_\_\_\_\_ 10 to 25
  5. \_\_\_\_\_ more than 25
- B. Suspicious behavior:
1. \_\_\_\_\_ None
  2. \_\_\_\_\_ 1 to 5
  3. \_\_\_\_\_ 5 to 10
  4. \_\_\_\_\_ 10 to 25
  5. \_\_\_\_\_ more than 25
- C. Failure to perform services contracted for (other than failure to provide a report of investigation):
1. \_\_\_\_\_ None
  2. \_\_\_\_\_ 1 to 5
  3. \_\_\_\_\_ 5 to 10
  4. \_\_\_\_\_ 10 to 25
  5. \_\_\_\_\_ more than 25
- D. Failure to provide a report of investigation:
1. \_\_\_\_\_ None
  2. \_\_\_\_\_ 1 to 5
  3. \_\_\_\_\_ 5 to 10
  4. \_\_\_\_\_ 10 to 25
  5. \_\_\_\_\_ more than 25
- E. Failure to appear in court or for other evidentiary proceeding:
1. \_\_\_\_\_ None
  2. \_\_\_\_\_ 1 to 5
  3. \_\_\_\_\_ 5 to 10
  4. \_\_\_\_\_ 10 to 25
  5. \_\_\_\_\_ more than 25
- F. No Virginia Private Investigator license and/or registration:
1. \_\_\_\_\_ None
  2. \_\_\_\_\_ 1 to 5
  3. \_\_\_\_\_ 5 to 10
  4. \_\_\_\_\_ 10 to 25
  5. \_\_\_\_\_ more than 25
- G. Other, please specify \_\_\_\_\_
- 

7. Please provide the name and address of a person in your office that we may contact for further information, if needed.
- 
- 

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PIBS-C  
CONS AFF

Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

If the addressed/stamped envelope is missing, please return to:

Commonwealth of Virginia  
Department of Commerce  
Private Security Services  
3600 West Broad Street  
Richmond, VA 23230

CONS AFF  
PIBS-C

APPENDIX F

Survey of Better Business Bureaus  
Private Investigator`s Board Study  
Survey of Advocacy Groups

Please return no later than June 26, 1987, in the addressed/stamped envelope provided.

1. How would you describe the problems with Private Investigators in your area?
  1.  Nonexistent
  2.  Minor
  3.  Moderate
  4.  Severe
  5.  Very Severe
  
2. How would you describe the frequency of problems with Private Investigators in your area?
  1.  Never
  2.  Rarely
  3.  Occasionally
  4.  Regularly
  5.  Continuously
  
3. Do you feel that there is a problem with abuses by Private Investigators in your area?
  1.  Yes
  2.  No
  
4. Please estimate the total number of all types of consumer complaints your agency handles each year.
  1.  None
  2.  1 to 5
  3.  5 to 10
  4.  10 to 25
  5.  25 to 50
  6.  more than 50
  
5. Please provide the total number of consumer complaints against Private Investigators you received last year.
  1.  None
  2.  1 to 5
  3.  5 to 10
  4.  10 to 25
  5.  25 to 50
  6.  more than 50
  
6. Please indicate the types of consumer complaints made against Private Investigators and provide the number of each type received last year.

\*\*\*CONTINUED ON BACK\*\*\*

PIBS-C  
BBB

A. Annoyance/Harassment/Rude language or behavior:

1.  None
2.  1 to 5
3.  5 to 10
4.  10 to 25
5.  more than 25

B. Suspicious behavior:

1.  None
2.  1 to 5
3.  5 to 10
4.  10 to 25
5.  more than 25

C. Failure to perform services contracted for (other than failure to provide a report of investigation):

1.  None
2.  1 to 5
3.  5 to 10
4.  10 to 25
5.  more than 25

D. Failure to provide a report of investigation:

1.  None
2.  1 to 5
3.  5 to 10
4.  10 to 25
5.  more than 25

E. Failure to appear in court or for other evidentiary proceeding:

1.  None
2.  1 to 5
3.  5 to 10
4.  10 to 25
5.  more than 25

F. No Virginia Private Investigator license and/or registration:

1.  None
2.  1 to 5
3.  5 to 10
4.  10 to 25
5.  more than 25

G. Other, please specify \_\_\_\_\_

7. Please provide the name and address of a person in your office that we may contact for further information, if needed.

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

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PIBS-C  
BBB

Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

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Commonwealth of Virginia  
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Private Security Services  
3600 West Broad Street  
Richmond, VA 23230

PIBS-C  
BBB

APPENDIX G

Survey of Chambers of Commerce  
Private Investigator`s Board Study  
Survey of Advocacy Groups

Please return no later than June 26, 1987, in the addressed/stamped envelope provided.

1. Does your agency handle consumer complaints?

1.  Yes  
2.  No

If your answer is "No" you need not proceed further. Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

2. How would you describe the problems with Private Investigators in your area?

1.  Nonexistent  
2.  Minor  
3.  Moderate  
4.  Severe  
5.  Very Severe

3. How would you describe the frequency of problems with Private Investigators in your area?

1.  Never  
2.  Rarely  
3.  Occasionally  
4.  Regularly  
5.  Continuously

4. Do you feel that there is a problem with abuses by Private Investigators in your area?

1.  Yes  
2.  No

5. Please estimate the total number of all types of consumer complaints your agency handles each year.

1.  None  
2.  1 to 5  
3.  5 to 10  
4.  10 to 25  
5.  25 to 50  
6.  more than 50

\*\*\*CONTINUED ON BACK\*\*\*

PIBS-C  
CHAM COM

6. Please provide the total number of consumer complaints against Private Investigators you received last year.

1. \_\_\_\_\_ None
2. \_\_\_\_\_ 1 to 5
3. \_\_\_\_\_ 5 to 10
4. \_\_\_\_\_ 10 to 25
5. \_\_\_\_\_ 25 to 50
6. \_\_\_\_\_ more than 50

7. Please indicate the types of consumer complaints made against Private Investigators and provide the number of each type received last year.

A. Annoyance/Harassment/Rude language or behavior:

1. \_\_\_\_\_ None
2. \_\_\_\_\_ 1 to 5
3. \_\_\_\_\_ 5 to 10
4. \_\_\_\_\_ 10 to 25
5. \_\_\_\_\_ more than 25

B. Suspicious behavior:

1. \_\_\_\_\_ None
2. \_\_\_\_\_ 1 to 5
3. \_\_\_\_\_ 5 to 10
4. \_\_\_\_\_ 10 to 25
5. \_\_\_\_\_ more than 25

C. Failure to perform services contracted for (other than failure to provide a report of investigation):

1. \_\_\_\_\_ None
2. \_\_\_\_\_ 1 to 5
3. \_\_\_\_\_ 5 to 10
4. \_\_\_\_\_ 10 to 25
5. \_\_\_\_\_ more than 25

D. Failure to provide a report of investigation:

1. \_\_\_\_\_ None
2. \_\_\_\_\_ 1 to 5
3. \_\_\_\_\_ 5 to 10
4. \_\_\_\_\_ 10 to 25
5. \_\_\_\_\_ more than 25

E. Failure to appear in court or for other evidentiary proceeding:

1. \_\_\_\_\_ None
2. \_\_\_\_\_ 1 to 5
3. \_\_\_\_\_ 5 to 10
4. \_\_\_\_\_ 10 to 25
5. \_\_\_\_\_ more than 25

\*\*\*CONTINUED ON NEXT PAGE\*\*\*

PIBS-C  
CHAM COM

F. No Virginia Private Investigator license and/or registration:

1.  None
2.  1 to 5
3.  5 to 10
4.  10 to 25
5.  more than 25

G. Other, please specify \_\_\_\_\_  
\_\_\_\_\_

8. Please provide the name and address of a person in your office that we may contact for further information, if needed.  
\_\_\_\_\_  
\_\_\_\_\_

**Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.**

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Richmond, VA 23230

PIBS-C  
CHAM COM



APPENDIX H

Survey of Trial Attorneys

Private Investigator`s Board Study  
Survey of Service Consumers

Please return no later than July 6, 1987, in the addressed/stamped envelope provided.

1. Have you used the services of a licensed Private Investigation firm during the past five years?

1.  Yes  
2.  No

If your answer is "No" you need not proceed further. Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

2. How would you describe problems with the Private Investigators you have used during the past five years?

1.  Nonexistent  
2.  Minor  
3.  Moderate  
4.  Severe  
5.  Very Severe

3. How would you describe the frequency of problems during the past five years with Private Investigators you have used?

1.  Never  
2.  Rarely  
3.  Occasionally  
4.  Regularly  
5.  Continuously

4. Please indicate the types of problems, if any, you have experienced with Private Investigators.

1.  Annoyance/Harassment/Rude language or behavior  
2.  Suspicious behavior  
3.  Failure to perform services contracted for  
4.  Failure to provide a report of investigation  
5.  Failure to appear in court or for other evidentiary proceeding  
6.  No Virginia Private Investigator license and/or registration  
7.  Other, please specify \_\_\_\_\_  
\_\_\_\_\_

\*\*\*CONTINUED ON BACK\*\*\*

PIBS-B  
TRIAL LAWYERS

5. Have you noticed any change in the nature of the problems you have experienced since November 1, 1984?

1.  Yes

2.  No

6. If yes, what is the nature of that change?

1.  Decreased competency of Private Investigators

2.  Increased competency of Private Investigators

3.  Decreased availability of services

4.  Increased availability of services

5.  Other (Please specify)

---

---

Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

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Richmond, VA 23230

PIBS-B  
TRIAL LAWYERS

APPENDIX I

Survey of Independent Insurance Adjusters

Private Investigator's Board Study  
Survey of Service Consumers

Please return no later than July 31, 1987, in the addressed/stamped envelope provided.

1. Have you used the services of a licensed Private Investigation firm during the past five years?
  1.  Yes
  2.  No

If your answer is "No" you need not proceed further. Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

2. How would you describe problems with the Private Investigators you have used during the past five years?
  1.  Nonexistent
  2.  Minor
  3.  Moderate
  4.  Severe
  5.  Very Severe
3. How would you describe the frequency of problems during the past five years with Private Investigators you have used?
  1.  Never
  2.  Rarely
  3.  Occasionally
  4.  Regularly
  5.  Continuously
4. Please indicate the types of problems, if any, you have experienced with Private Investigators.
  1.  Annoyance/Harassment/Rude language or behavior
  2.  Suspicious behavior
  3.  Failure to perform services contracted for
  4.  Failure to provide a report of investigation
  5.  Failure to appear in court or for other evidentiary proceeding
  6.  No Virginia Private Investigator license and/or registration
  7.  Other, please specify \_\_\_\_\_

\*\*\*CONTINUED ON BACK\*\*\*

PIBS-B  
INS ADJUSTOR

5. Have you noticed any change in the nature of the problems you have experienced since November 1, 1984?

- 1.  Yes
- 2.  No

6. If yes, what is the nature of that change?

- 1.  Decreased competency of Private Investigators
  - 2.  Increased competency of Private Investigators
  - 3.  Decreased availability of services
  - 4.  Increased availability of services
  - 5.  Other (Please specify)
- 
- 

**Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.**

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Private Security Services  
3600 West Broad Street  
Richmond, VA 23230

PIBS-B  
INS ADJUSTOR

APPENDIX J

Survey of Security Managers

Private Investigator`s Board Study  
Survey of Service Consumers

Please return no later than July 6, 1987, in the addressed/stamped envelope provided.

1. Have you used the services of a licensed Private Investigation firm during the past five years?
  1.  Yes
  2.  No

If your answer is "No" you need not proceed further. Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

2. How would you describe problems with the Private Investigators you have used during the past five years?
  1.  Nonexistent
  2.  Minor
  3.  Moderate
  4.  Severe
  5.  Very Severe
3. How would you describe the frequency of problems during the past five years with Private Investigators you have used?
  1.  Never
  2.  Rarely
  3.  Occasionally
  4.  Regularly
  5.  Continuously
4. Please indicate the types of problems, if any, you have experienced with Private Investigators.
  1.  Annoyance/Harassment/Rude language or behavior
  2.  Suspicious behavior
  3.  Failure to perform services contracted for
  4.  Failure to provide a report of investigation
  5.  Failure to appear in court or for other evidentiary proceeding
  6.  No Virginia Private Investigator license and/or registration
  7.  Other, please specify \_\_\_\_\_

\*\*\*CONTINUED ON BACK\*\*\*

PIBS-B  
SEC MAGRS

5. Have you noticed any change in the nature of the problems you have experienced since November 1, 1984?

- 1.  Yes
- 2.  No

6. If yes, what is the nature of that change?

- 1.  Decreased competency of Private Investigators
  - 2.  Increased competency of Private Investigators
  - 3.  Decreased availability of services
  - 4.  Increased availability of services
  - 5.  Other (Please specify)
- 

**Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.**

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Private Security Services  
3600 West Broad Street  
Richmond, VA 23230

PIBS-B  
SEC MAGRS

APPENDIX K

Survey of Fire Marshalls  
Private Investigator`s Board Study  
Survey of Public Agencies

**Please return no later than July 31, 1987, in the addressed/stamped envelope provided.**

1. How often do you find Private Investigators involved in situations which cause a threat to public safety and welfare?
  1.  Never
  2.  Rarely
  3.  Occasionally
  4.  Regularly
  5.  Constantly
  
2. How would you describe the hazard to the public caused by Private Investigators?
  1.  Nonexistent
  2.  Minor
  3.  Moderate
  4.  Severe
  5.  Very Severe
  
3. How would you evaluate the performance of the Private Investigators you encounter?
  1.  Do Not Encounter Private Investigators
  2.  Very Inadequate
  3.  Inadequate
  4.  Adequate
  5.  Very Good
  6.  Excellent

**Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.**

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Department of Commerce  
Private Security Services  
3600 West Broad Street  
Richmond, VA 23230

PIBS-D  
FIRE MARSHALS

APPENDIX L

Survey of Sheriffs

Private Investigator`s Board Study  
Survey of Public Agencies

Please return no later than July 13, 1987, in the addressed/stamped envelope provided.

1. Are you the principal law enforcement agency in your jurisdiction?

       Yes  
       No

2. How often do you find Private Investigators involved in situations which cause a threat to public safety and welfare?

1.        Never  
2.        Rarely  
3.        Occasionally  
4.        Regularly  
5.        Constantly

3. How would you describe the hazard to the public caused by Private Investigators?

1.        Nonexistent  
2.        Minor  
3.        Moderate  
4.        Severe  
5.        Very Severe

4. Approximately how many citizen complaints against Private Investigators have you received during the past two (2) years?

1.        none  
2.        1 to 5  
3.        5 to 10  
4.        10 to 25  
5.        25 to 50  
6.        more than 50

5. Of the total in question three above, approximately how many involved the following situations?

1.        Annoyance/Harassment/Rude language or behavior  
2.        Suspicious behavior  
3.        Failure to perform services contracted for  
4.        Failure to provide a report of investigation  
5.        Failure to appear in court or for other evidentiary proceeding  
6.        No Virginia Private Investigator license and/or registration  
7.        Other, please specify \_\_\_\_\_  
\_\_\_\_\_

\*\*\*CONTINUED ON BACK\*\*\*



6. Approximately how many Private Investigators have been convicted of offenses committed while performing investigations during the last two years in your jurisdiction?

- 1. \_\_\_\_\_ none
- 2. \_\_\_\_\_ 1 to 5
- 3. \_\_\_\_\_ 5 to 10
- 4. \_\_\_\_\_ 10 to 25
- 5. \_\_\_\_\_ 25 to 50
- 6. \_\_\_\_\_ more than 50

7. Of the above total, approximately how many were convicted of the following offenses?

- 1. \_\_\_\_\_ Trespass
- 2. \_\_\_\_\_ Assault/Battery/Bodily Harm
- 3. \_\_\_\_\_ Wire Taping
- 4. \_\_\_\_\_ Unlawful Entry/Entry by Force/Burglary
- 5. \_\_\_\_\_ Reckless Driving/other Driving related Misdemeanors
- 6. \_\_\_\_\_ Misuse of Firearms or other Weapon
- 7. \_\_\_\_\_ Other, please specify \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. How would you evaluate the performance of the Private Investigators you encounter?

- 1. \_\_\_\_\_ Do Not Encounter Private Investigators
- 2. \_\_\_\_\_ Very Inadequate
- 3. \_\_\_\_\_ Inadequate
- 4. \_\_\_\_\_ Adequate
- 5. \_\_\_\_\_ Very Good
- 6. \_\_\_\_\_ Excellent

**Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.**

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Richmond, VA 23230

SHERIFF  
PIBS-D

APPENDIX M

Survey of Commonwealth's Attorneys

Private Investigator's Board Study  
Survey of Public Agencies

Please return no later than June 26, 1987, in the addressed/stamped envelope provided.

1. How often do you find Private Investigators involved in situations which cause a threat to public safety and welfare?
  1.  Never
  2.  Rarely
  3.  Occasionally
  4.  Regularly
  5.  Constantly
  
2. How would you describe the hazard to the public caused by Private Investigators?
  1.  Nonexistent
  2.  Minor
  3.  Moderate
  4.  Severe
  5.  Very Severe
  
3. Approximately how many citizen complaints against Private Investigators have you received during the past two (2) years?
  1.  none
  2.  1 to 5
  3.  5 to 10
  4.  10 to 25
  5.  25 to 50
  6.  more than 50
  
4. Of the total in question three above, approximately how many involved the following situations?
  1.  Annoyance/Harassment/Rude language or behavior
  2.  Suspicious behavior
  3.  Failure to perform services contracted for
  4.  Failure to provide a report of investigation
  5.  Failure to appear in court or for other evidentiary proceeding
  6.  No Virginia Private Investigator license and/or registration
  7.  Other, please specify \_\_\_\_\_

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\*\*\*CONTINUED ON BACK\*\*\*

PIBS-D  
COM/ATNY

5. Approximately how many Private Investigators have been convicted of offenses committed while performing investigations during the last two years in your jurisdiction?

1.  none
2.  1 to 5
3.  5 to 10
4.  10 to 25
5.  25 to 50
6.  more than 50

6. Of the above total, approximately how many were convicted of the following offenses?

1.  Trespass
2.  Assault/Battery/Bodily Harm
3.  Wire Taping
4.  Unlawful Entry/Entry by Force/Burglary
5.  Reckless Driving/other Driving related Misdemeanors
6.  Misuse of Firearms or other Weapon
7.  Other, please specify \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. How would you evaluate the performance of the Private Investigators you encounter?

1.  Do Not Encounter Private Investigators
2.  Very Inadequate
3.  Inadequate
4.  Adequate
5.  Very Good
6.  Excellent

8. Please provide the name and address of a person in your office that we may contact for further information, if needed.

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

**Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.**

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Richmond, VA 23230

PIBS-D  
COM/ATNY

APPENDIX N

Private Investigator`s Board Study  
Survey of Police Agencies

Please return no later than July 13, 1987, in the addressed/stamped envelope provided.

1. How often do you find Private Investigators involved in situations which cause a threat to public safety and welfare?
  1.  Never
  2.  Rarely
  3.  Occasionally
  4.  Regularly
  5.  Constantly
  
2. How would you describe the hazard to the public caused by Private Investigators?
  1.  Nonexistent
  2.  Minor
  3.  Moderate
  4.  Severe
  5.  Very Severe
  
3. Approximately how many citizen complaints against Private Investigators have you received during the past two (2) years?
  1.  none
  2.  1 to 5
  3.  5 to 10
  4.  10 to 25
  5.  25 to 50
  6.  more than 50
  
4. Of the total in question three above, approximately how many involved the following situations?
  1.  Annoyance/Harassment/Rude language or behavior
  2.  Suspicious behavior
  3.  Failure to perform services contracted for
  4.  Failure to provide a report of investigation
  5.  Failure to appear in court or for other evidentiary proceeding
  6.  No Virginia Private Investigator license and/or registration
  7.  Other, please specify \_\_\_\_\_

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\*\*\*CONTINUED ON BACK\*\*\*

PIBS-D  
POLICE

5. Approximately how many Private Investigators have been convicted of offenses committed while performing investigations during the last two years in your jurisdiction?

1. \_\_\_\_\_ none
2. \_\_\_\_\_ 1 to 5
3. \_\_\_\_\_ 5 to 10
4. \_\_\_\_\_ 10 to 25
5. \_\_\_\_\_ 25 to 50
6. \_\_\_\_\_ more than 50

6. Of the above total, approximately how many were convicted of the following offenses?

1. \_\_\_\_\_ Trespass
2. \_\_\_\_\_ Assault/Battery/Bodily Harm
3. \_\_\_\_\_ Wire Taping
4. \_\_\_\_\_ Unlawful Entry/Entry by Force/Burglary
5. \_\_\_\_\_ Reckless Driving/other Driving related Misdemeanors
6. \_\_\_\_\_ Misuse of Firearms or other Weapon
7. \_\_\_\_\_ Other, please specify \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. How would you evaluate the performance of the Private Investigators you encounter?

1. \_\_\_\_\_ Do Not Encounter Private Investigators
2. \_\_\_\_\_ Very Inadequate
3. \_\_\_\_\_ Inadequate
4. \_\_\_\_\_ Adequate
5. \_\_\_\_\_ Very Good
6. \_\_\_\_\_ Excellent

**Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.**

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Private Security Services  
3600 West Broad Street  
Richmond, VA 23230

PIBS-D  
POLICE

APPENDIX O

Private Investigator's Board Study  
Survey of States

Please return no later than June 26, 1987, in the addressed/stamped envelope provided.

1. Does your state regulate Private Investigators?
  1.  Yes, regulated by an agency of state government.
  2.  No, regulated by local jurisdictions.
  3.  Not regulated

If you answered "No, regulated by local jurisdictions" or "Not regulated" to question one above, you need not proceed further. Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.

2. If you answered "Yes" to number one above, is the authority to promulgate regulations and take disciplinary actions vested in:
  1.  A board or commission composed at least in part of practicing Private Investigators?  
Please specify the name of the board or commission and give its mailing address: \_\_\_\_\_
  2.  An agency of the state government?  
Please specify which agency and give its mailing address: \_\_\_\_\_
  3.  Other (Please Explain) \_\_\_\_\_
3. What requirements must be met in order to qualify for a Private Investigator Business License?
  1.  Minimum education/experience requirements of specific management personnel.
  2.  Pass an examination establishing a minimum knowledge of state regulatory law and regulations on the part of specific management personnel.
  3.  Both a minimum education/experience requirement and an examination.
  4.  Other (Please Explain) \_\_\_\_\_

\*\*\*CONTINUED ON BACK\*\*\*

PIBS-E

4. Approximately how many Private Investigation firms are currently licensed in your state?
1.  Fewer than 50
  2.  50 to 100
  3.  100 to 200
  4.  200 to 300
  5.  300 to 400
  6.  400 or more
5. Does your state require the Private Investigator firm`s employees who actually conduct investigations to have an individual license or registration?
1.  Yes
  2.  No
6. If you answered "Yes" to question five above:
- A. Must the Private Investigator firm`s employees pass a state mandated training course to qualify for a license?
1.  Yes
  2.  No
- B. Must the Private Investigator firm`s employees show evidence of some previous occupation related training or experience before being eligible for a license?
1.  Yes
  2.  No
- C. Do you conduct a criminal records check of the Private Investigator firm`s employees who apply for a Private Investigator license?
1.  Yes
  2.  No

**Please send a copy of your current Private Investigator regulatory statute and regulations under separate cover.**

**Please return this form in the addressed/stamped envelope provided. Thank you for your time and effort.**

**If the addressed/stamped envelope is missing, please return to:**

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Department of Commerce  
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3600 West Broad Street  
Richmond, VA 23230

PIBS-E

