



September 15th, 2014

Francine C. Ecker, Director
Department of Criminal Justice Services
1100 Bank Street
Richmond, Virginia 23219

Dear Ms. Ecker:

In May of this year, shortly after you assumed executive responsibility for the Department of Criminal Justice Services (DCJS), you met with representatives of the Board of Directors of the Private Investigators Association of Virginia, Inc. (PIAVA) at our request. We sought that opportunity so that we could bring to your personal attention issues of significant concern to the membership of not only our association, but registrants from other segments of the private security industry in Virginia as well. I am writing this letter to you in the interests of continuing the productive dialogue we began in that meeting.

At the outset, I would like to take this opportunity to express our Association's appreciation for the approach taken by former Deputy Director Drew Molloy to effectively resolve PIAVA's request to receive information from the department sufficient for our association to make contact by email with individuals who are registered with DCJS as Private Investigators. Although the approach taken by Mr. Molloy was not what we requested, it did provide a compromise solution that enabled both DCJS and PIAVA to address their respective needs.

Perhaps the most significant facet of our discussions in that meeting involved the substantial changes which DCJS has made to the appearance and content of identification cards issued to private security registrants. We commented that the changes made to registrant ID cards has had a significant negative impact upon both the functionality and utility of the identification card as a means to validate an individual's identity, registration with DCJS and/or his/her authorization to perform regulated services. Moreover, we indicated that proposed policy by DCJS regarding the need to use the new registrant ID card with another unspecified form of photographic identification had the potential to create circumstances that could result in

P.O. Box 1115 | Fairfax, Virginia 22038
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impersonation of a registrant and/or disclosure of a registrant's personal data to other individuals in a manner not otherwise required by Virginia code. Based upon our discussion of that issue, it has been our perception that you intended to review the issue to determine if corrective action by DCJS was warranted. Given the significance of resolution of this issue to PIAVA members and other registrants, I am writing to determine if DCJS has begun corrective action to address the concerns we voiced. If corrective action has begun, we would appreciate learning the time frame in which they will be accomplished and an opportunity to provide constructive feedback regarding the efficacy of any proposed changes to registrant ID cards issued by the Department.

Effective regulation and enforcement of the provisions of Virginia code as they pertain to the Private Security industry, and in particular registered Private Investigative businesses and personnel, is of significant importance to those in our profession and to the citizens of the Commonwealth we serve. As a result, our Association requires each of its members to adopt our Association's Code of Professional Conduct as a condition of membership in the Association. Moreover, we have established a New Member Indoctrination Training Course and have begun to sponsor specialized training opportunities designed to enhance the knowledge and expertise of investigative personnel who are registered with DCJS. We would welcome an opportunity to begin a dialogue with DCJS regarding how the Association can take additional steps to further our common goals in this area.

In closing, I would like to reiterate our past offer to provide constructive feedback regarding efforts by the Department to develop a Credentialing Management System for the Private Security Industry and to assist the Department in any matter pertinent to Private Investigative businesses and registrants. Please contact me if we can be of any assistance!

Sincerely yours,

Kenneth P. D'Angelo
President