



Board of Private Detective and Protective Agent Services  
1600 University Ave – Suite 200  
St. Paul, MN 55106

RE: HF4066

Dear Legislators,

I am not writing in support or opposition to HF4066 as amended. It is important that you as legislators see this bill from the perspective of the agency that would have to enforce these regulations.

When a license holder is involved in statute violations there is a lengthy process including review by the Complaint Committee, the agency investigative process, final review by the full Board and the possibility of contested case hearing with the Court of Administrative Hearings (CAH). There are several issues with the bill that could have detrimental effect on the process of determining responsibility and accountability with these violations.

**Definitions:**

As in many court situations, determinations come down to the specifics and interpretations of definitions used in the language of statutes.

**Subd. 1a. (a):** *“License holders who provide security services **must attempt** to match an employee's skills and training with the tier of security service the employee is assigned to provide. “ One could ascertain that the term “**must attempt**” would create challenges in holding a license holder accountable and proving a violation occurred as it could mean many different types of effort a license holder did to abide by the regulation.*

**Subd 1a. (d)** *“...high-risk buildings”. There would need to be determined exactly what is considered a “high-risk” building. Would this derive from law enforcement incident responses to certain premises? Would there be a need to have a security assessment conducted?*

**Subd 1a. (e):** *“high-risk environment”. As stated above, what determines ‘high-risk’?*

**Identification of Security Officers:**

Current statutes place the responsibility on license holders to provide their security officers with photo identification. [326.336 Subd. 2. Identification card]. To determine which security personnel are authorized to perform in certain tiers the statute related to this would have to be further defined.

**Tier Jumping**

With a classification system as proposed, the potential for violations would increase significantly. One could ascertain that license holders may, knowingly or not, place security officers in duties that they were not properly trained or classified for which would be a violation. For example, a license holder may have Tier 1 level employees working Tier 4 level jobs.

**Use of the term “Teir”:**

The Tier System is historically used in military terms categorizing the level of what types of military personnel perform certain tasks. One could ascertain, especially after recent events in Minnesota, that associating private security officers with military terms could portray them in a less than favorable light, or give the perception they are military personnel.

In conclusion, please note that our Board has not had an opportunity to formally discuss this bill. Our Board Chair and I are more than willing to offer our technical expertise to legislation that affects the industry here in Minnesota. It would also be beneficial if other stakeholders, including the license holders and certified trainers, be part of the discussion.

If you have any comments or concerns, please do not hesitate to contact me.

Sincerely,

Greg Cook  
MNPDB Executive Director  
651-355-0817  
Greg.Cook@state.mn.us

Mrs. McDaniels,

My name is Dale Krueger, and I am the owner of Signal in Minneapolis, as well as a licensed protective agent.

I am writing to express my concern regarding the current and proposed regulations for unarmed security personnel. As they stand today, the requirements placed on standard unarmed guards are already more stringent than those in many other states. The proposed changes would further increase these burdens, making it significantly more difficult to recruit, train, and retain personnel for what is typically considered an entry-level position.

In many industries, individuals in comparable roles are not subject to the same level of training or licensing requirements. Increasing these standards further will inevitably raise costs and limit our ability to provide effective and affordable security services to our clients.

While I understand and support higher standards for armed or specialized security roles, applying similar expectations to basic functions—such as monitoring entry points at multifamily housing complexes—creates unnecessary barriers without a proportional benefit to safety.

Many individuals who enter unarmed security roles do not view them as long-term careers, and overly burdensome requirements risk discouraging otherwise capable candidates from entering the field altogether.

I respectfully ask that you take these considerations into account when evaluating and voting on the proposed changes.

Thank you for your time and consideration.



Minnesota House Public Safety Finance and Policy Committee  
100 Rev. Dr. Martin Luther King Jr. Boulevard  
St. Paul, MN 55155  
c/o the Hon. Paul Novotny, Co-chair, and the Hon. Kelly Moller, Co-Chair

Re: HF4066

Representatives Novotny, Moller, and Members of the Committee,

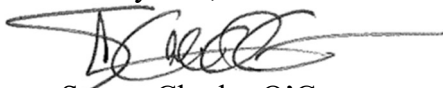
My name is Steven O'Connor – I am the General Counsel of First Coast Security, and I am submitting this testimony in opposition of HF4066, which would impose an undue burden on Security Providers in the State of Minnesota, and by extension, could jeopardize the well-being of the citizens of the State, and your constituents.

While the legislation may be well intended, it will likely create fallout in a number of ways that do not appear to be fully contemplated for the security industry, generally. Stakeholders in our industry know that the services we provide are already highly (and appropriately) regulated across Minnesota. Imposing additional requirements may impact the industry's ability to respond quickly, and when necessary, scale-up operations to meet the safety needs of the community. The security industry is highly fluid, requiring constant adjustments and immediate response – HF4066 places that flexibility in doubt, which limits the ability of the industry to respond in rapid fashion.

The bill may also increase direct training costs, which would have a greater impact on small businesses, including those that are locally owned and operated within the state. The bill creates rigid categories that impede flexibility, and imposes a regulatory framework that no matter the size of the security provider, does not fully take into account the ever-changing environment that security professionals encounter on a daily basis.

Many in the industry would welcome an opportunity to work with the legislature to craft common-sense legislation that addresses public safety concerns from both sides – that the public is provided with a security force that is qualified, competent, and capable, while also allowing businesses that provide security services the adaptability they need for on-ground response. HF4066 respectively meets neither need, and I would encourage the Committee to vote "No" on its passage.

All my best,



Steven Charles O'Connor  
General Counsel

# ELITE PROTECTIVE SERVICES, INC.

"DEDICATED TO PROTECTING YOUR INTERESTS"



April 13, 2026

**Written Testimony in Opposition to HF4066  
Submitted to the Minnesota House Public Safety Finance and Policy  
Committee**

Chair(s) and Members of the Committee,

As a license holder in Minnesota since 1998, I would like to express my concern and strong opposition to HF 4066. In my view, the proposed legislation is vague in its requirements, overly complicated, and unnecessary.

The private security industry in Minnesota is a dynamic market, and security companies often need to move swiftly to provide the services our clients request. This bill would create more obstacles and red tape with no clear purpose or actual benefit to the industry as a whole.

I believe this bill needs much more input from industry stakeholders to create effective reforms that will actually improve the viability of the security business in Minnesota.

I respectfully urge the Committee to vote no on this bill.

Sincerely

Kevin Eckhoff  
VP of Operations  
Elite Protective Services, Inc.



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04/13/2026

**Written Testimony in Opposition to HF4066**

Submitted to the Minnesota House Public Safety Finance and Policy Committee

Dear Chair(s) and Members of the Committee,

Our firm, Global Security Consulting Group Inc., has been operating in the state of Minnesota since 2019, license number 2118. We are a provider of private contract aviation security operating under Federal requirements as per the Department of Homeland Security's Transportation Security Administration (TSA) Title 49 Part 1500 regulations. ***Please accept this letter as an official response in opposition to the proposed legislation. We respectfully request that the Committee vote NO on HF4066.***

In addition to the current state-mandated training and background checks, our organization runs all employees through additional internal background checks annually. Plus, all Minnesota employees will undergo a federal check conducted by the airport authority which includes a CHRC (Criminal History Records Check) and STA (Security Threat Assessment).

On top of the current Minnesota State Security training obligations, Global delivers our training program which consists of an initial 16 hours of classroom instruction, plus 8 hours of On-The-Job training prior to being placed on post for employee inspections. This training program includes, but is not limited to:

- Security awareness
- Roles of a security guard and communications
- Post patrols
- Insider threats and situational awareness
- Anti-terrorism Awareness and Active Shooter Preparedness
- Emergency preparedness and threat mitigation
- Introduction to aviation security
- Incident reporting and reporting writing
- X-ray and Explosive Trace Detection
- Screening of airport personnel

HF4066, as currently written, will create significant operational and financial burden to all protective agent license holders and companies without a corresponding improvement in public safety outcomes.



Once again, we respectfully request that the Committee vote NO on HF4066.

Sincerely,

A handwritten signature in blue ink, appearing to read "Victor Anderes", with a long horizontal stroke extending to the right.

Victor Anderes  
President & CEO,  
Minnesota Qualified Representative & Minnesota Manager  
Global Security Consulting Group Inc.  
Garden City, NY 11530  
516-414-0487

## Greetings to the Minnesota House Public Safety Finance and Policy Committee

I am the owner and license holder of Gorilla Defense Group LLC, my company provides security services to local businesses, and like many in this industry, we operate on thin margins and rely on a workforce that is often looking for a path to stable employment. I urge you to vote no, on HF4066. While I support professional development, this bill imposes a rigid, unfunded mandate that will decimate the security industry in Minnesota, drive up costs for local businesses, and create severe staffing shortages.

Here are some reasons why this bill is detrimental to security companies like mine:

Minnesota requires 12 hours of preassignment training within the first 21 days of employment .HF4066 raises this to 40 hours for Tiers 2 through 5 (which covers standard access control, patrols, and unarmed high-risk security) . Forty hours is a full work week. In the security industry, we don't have classrooms full of people waiting to start. Most of our hires want to start earning a paycheck immediately. If this bill passes, a new hire cannot work a paid shift for the first week of employment. Instead, they must sit through 40 hours of unpaid (or paid, which would bankrupt us) training before they can even check an ID at a front desk. This will kill our talent pipeline.

The bill allows that the 40 hours can be completed within the first 21 days of employment or "on-the-job" . However,

it explicitly states: "On-the-job training under this subdivision is not allowed to involve carrying or using a weapon" . For a Tier 3 officer (unarmed high-risk) or a Tier 4 officer (armed transport), how do they train "on the job" without performing the job? If they cannot carry a weapon or detain a trespasser while training, they cannot be on the post. This forces owners to double-bill clients (paying a trainer and a trainee) or leave posts vacant. For a small company, this math doesn't work.

The bill mandates preassignment training in "community health and wellness," specifically covering "drug/alcohol addiction, homelessness, [and] mental illness". I hire security guards, not social workers. While de-escalation is critical, the bill mandates specific medical and psychiatric training (including administering opiate antagonists) without providing a funding mechanism . We are private businesses, not mobile mental health crisis units. Mandating this level of medical training will require us to hire nurses or social workers, drastically raising the cost of security for grocery stores and apartment buildings.

**The Proprietary Employer Loophole Remains Open**  
The bill applies these stringent training rules to licensed agencies like mine, but merely says proprietary employers (in-house security for a single corporation) "must follow the same training requirements" . Who enforces that? The Board does not license those in-house guards. This creates an uneven playing field. My licensed agency will be crushed by the cost of 40 hours of preassignment training, while a big-box retailer hiring their own "asset protection" staff can interpret the rules loosely without a license board breathing

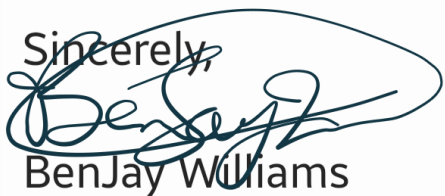
down their neck. This bill penalizes the small contractor while leaving the large corporation to self-police.

HF4066 mandates six hours of continuing education annually for all, plus another six hours (12 total) for armed guards . We also must provide annual "certification" for restraint techniques and weapons. Training costs money. If I have to pay staff for 40 hours of entry training plus 12 hours of annual CEUs, I have to raise my rates to my clients. My clients are local bars, churches, and small retail stores. They will cancel security contracts before paying double for a guard who has had a semester's worth of sociology training.

HF4066 is a solution in search of a problem. The current 12-hour standard, paired with on-the-job experience and annual continuing education, has served Minnesota well. This bill adds massive administrative overhead (tracking Tier levels, annual weapon certs, medical training) and financial burden that will force consolidation in the industry.

Please vote NO on HF4066. Let us keep our communities safe without bankrupting the small businesses hired to do it.

Sincerely,



BenJay Williams

CEO/Owner of Gorilla Defense Group

Licensed Protective Agent, State of Minnesota

763-242-7027





Minnesota Association of Private Investigators  
and Protective Agents (MAPI)

April 13, 2026

Co-Chair Rep. Kelly Moller  
Co-Chair Re. Paul Novotny  
Minnesota House Public Safety Finance and Policy Committee  
Centennial Office Building  
St. Paul, MN 55155

**Re: Opposition to proposed HF 4066**

Dear Co-Chairs Moller & Novotny and Members of the Committee,

The Minnesota Association of Private Investigators and Protective Agents (“MAPI”) is a non-profit member organization founded more than thirty years ago and dedicated to educational training, mentoring and networking for licensed private detectives and protective agents in Minnesota. MAPI’s membership is comprised of owners, managers, and employees of license-holding companies across the State of Minnesota. While we have several members with a large number of employees, the majority of our members are small business owners with fewer than ten employees. MAPI is the only state-wide association for private investigators and protective agents in Minnesota and our association is also a training provider.

The members of the MAPI Board of Directors have reviewed HF 4066 and considered it in light of last session’s legislative proposal by SEIU Local 26, and the prior iteration of this bill, HF 1686. We have also received input from concerned MAPI members and reviewed the 2025 Stakeholder Impact Report put forth by Executive Director Greg Cook, Minnesota Board of Private Detective and Protective Agent Services.

We appreciate the work to revise the previous bill and acknowledge that HF 4066 presents a more nuanced approach than its predecessor. Specifically, the introduction of a tiered system for security services and the removal of the proposed increase to the required hours for Level 1 providers are positive developments reflecting responsiveness to initial stakeholder feedback.

However, the proposed changes to the required preassignment for protective agents continue to reflect a standard that would be unduly burdensome to our members. Significant concerns remain as to the impact of this bill on our members, and the broader security community, resulting in a negative impact to the Minnesota business community and ultimately to public safety.

Our primary concerns include the following:

- **The tiered system contained in HF 4066 creates a system that would be unnecessarily complex and place an increased burden on the Minnesota Private Detective and Protective Agents Board.**

The proposed five tier classification system would introduce unnecessary complexity into the industry. The tiers themselves have an inherent ambiguity and the boundaries between classification levels leave considerable room for interpretation regarding which job functions fall under which tier.

Beyond burdening the businesses required to navigate it, this system would also place significant additional strain on the licensing board responsible for its oversight – a board that already struggles to manage its existing caseload of private detective and protective agent companies. As it stands, the board’s enforcement tools are largely limited to license renewals and the board lacks the capacity to oversee a complex tiered system that would require consistent interpretation and application of the laws.

Rather than strengthening oversight, this tiered system risks diluting it by stretching already scarce regulatory resources across a framework that would be far too complex to manage effectively.

- **HF 4066 includes an unreasonable increase in training hours for Tiers 2 through 5, making it cost prohibitive for the vast majority of our members.**

The 40 hour preassignment training for Tiers 2 through 5 remains prohibitively expensive and operationally unworkable for most security providers, especially small businesses. For a full time employee performing services categorized as Tier 2 or higher, the proposed rules would increase preassignment training from 12 to 40 hours.

First, the number of hours outlined in the proposed legislation is unreasonable and fails to take into account comparable industry standards. While we commend the retention of the 12-hour standard for Tier 1 services, the broad application of a 40-hour requirement for Tiers 2 through 5 represents a 333% increase that is not justified by the duties performed. For example, Tier 2 services are defined as basic patrols and visitor escorts “with no expectation of detaining trespassers.” Requiring the same 40 hours of training for this role as for high-risk armed transport in Tier 4 is disproportionate and fails the logic of a tiered system.

Second, there remains concern that any legislation would require all of the preassignment training to be conducted in-person. We urge the committee to amend the bill to explicitly permit a mix of in-person, virtual, and on-demand training formats to reduce costs and improve accessibility, particularly for licensees in Greater Minnesota.

Finally, this requirement will have a negative impact on the staffing and budgets for licensees, as well as the individuals and organizations that hire them. A 40-hour preassignment mandate creates significant logistical and financial burdens. Corporate employers would be required to absorb not only the cost of the training itself but also the wages for the employee in training and a second employee to cover the missed shifts. These substantial costs will inevitably be passed on

to the Minnesota businesses, hospitals, and public institutions that rely on security services, or they will be forced to reduce their security posture.

- **HF 4066 will negatively impact public safety by creating a chilling effect on hiring and encouraging unlicensed practice.**

In an industry that already has difficulty filling positions with skilled employees, these requirements have the potential to create severe delays or gaps in hiring. Making such a significant jump in training requirements, as well as now applying it to all proprietary security staff, would create an environment ripe for fraud and unlicensed practice. Companies may seek shortcuts to avoid costly and time-consuming licensing requirements, leading to a deterioration of professional standards. As written, this proposed legislation appears to lack the safeguards and resource allocation to ensure such a significant change would not have this unintended and dangerous result.

Additionally, as discussed above, the Minnesota Board of Private Detectives and Protective Agents lacks internal resources and its ability to combat unlicensed activity is currently extremely limited. Any legislation increasing the requirements on the Board must also consider its resources, as well as requiring the cooperation and assistance of law enforcement agencies.

- **The new expansion of training mandates to proprietary employers represents a massive and costly new regulation on Minnesota businesses.**

HF 4066 newly extends these extensive training requirements to any business that employs its own in-house security staff, potentially also including staff who do not currently fall under the state's licensing requirements. This dramatically expands the bill's scope beyond the contract security industry to affect manufacturers, hospitals, data centers, corporate campuses, and countless other Minnesota employers. These entities are not in the business of security but will now face the same burdensome 40-hour training mandate for their employees. This provision was not in the original bill and will create a significant, sudden, and costly compliance burden on a large swath of the state's economy, with little demonstrated need or benefit.

- **Any changes to training requirements should be made with meaningful input from all stakeholders through a formal collaborative process.**

The information submitted last year by SEIU Local 26, which appears to have been the foundation for this legislation, fails to consider the views of professionals in the field, small business owners, and other critical stakeholders, including the myriad of Minnesota businesses that would be regulated as proprietary employers. It is also unclear that the Minnesota Board of Private Detectives and Protective Agents was consulted in a meaningful way.

We appreciate the revisions made in HF 4066, but they highlight the need for a more comprehensive and collaborative approach. We believe that to make impactful change in the area of training, it must be done in a way that involves all relevant stakeholders. MAPI is willing to provide feedback or participate in a joint effort with other stakeholders to review current guidelines and to make recommendations for impactful, effective, and practical change.

While this list does not capture every concern our members have raised, it reflects the depth of impact this proposed legislation would have across our industry. We remain firmly committed to promoting professionalism in our field and welcome the opportunity to work with legislators toward that shared goal.

As written, HF 4066 would threaten the viability of many of our members' businesses and place an undue burden on the broader Minnesota business community. We respectfully urge further dialogue before this measure advances, and we stand ready to offer our expertise in crafting a workable path forward.

Sincerely,

Tim Gulden, MAPI President, Blue Line Investigations &  
Security Services LLC  
Dan Gilbertson, Gilbertson Investigations LLC  
Bill Sires, Crescent Investigative Services  
Molly Donaldson, Waverly Research LLC  
Scott Andreasen, Scott Investigations  
Brian Ferguson, Initiatives Group  
Troy Kush, Applied Professional Services

cc: Rep. Sandra Feist, Co-Vice Chair  
Rep. Jeff Witte, Co-Vice Chair  
Rep. Kaela Berg  
Rep. Matt Bliss  
Rep. Brion Curran  
Rep. Bidal Duran  
Rep. Emma Greenman  
Rep. Bobbie Harder  
Rep. Athena Hollins  
Rep. Pete Johnson  
Rep. Krista Knudsen  
Rep. Dave Pinto  
Rep. Lucy Rehm  
Rep. Aaron Repinski  
Rep. Erica Schwartz  
Rep. Terry Stier  
Rep. Brad Tabke  
Rep. Cal Warwas



**Midwest Protection Agency Inc.**  
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mwprotection.net

***"PROTECTION YOU CAN DEPEND ON"***

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April 13, 2026

**Written Testimony in Opposition to HF4066**

Submitted to the Minnesota House Public Safety Finance and Policy Committee

Chair(s) and Members of the Committee,

My name is Michael Seman, I am the owner of Midwest Protection Agency Inc, a small business based out of Maple Grove, MN. We hold a Protective Agent License and have been in business since 2006. I respectfully submit this testimony in strong opposition to HF4066. As a stakeholder in the protective agent and private security industry, I am deeply concerned about the unintended consequences this legislation would have on licensed professionals, public safety operations, and the communities we serve.

HF4066, as currently written, introduces regulatory changes that would significantly burden protective agent license holders without a corresponding improvement in public safety outcomes. The bill appears to impose additional requirements and restrictions that are duplicative, unclear in implementation, and likely to create operational inefficiencies across the industry.

First, the proposed changes risk undermining the effectiveness of trained protective agents by limiting their ability to perform their duties in a timely and professional manner. Protective agents are already subject to rigorous licensing, training, and oversight requirements. Adding further constraints without clear justification may hinder response capabilities and reduce overall security effectiveness.

Second, HF4066 creates unnecessary administrative and financial burdens on businesses that employ protective agents and security personnel. Increased compliance costs, potential liability exposure, and unclear enforcement standards could force smaller agencies out of operation, ultimately reducing the availability of qualified security professionals in Minnesota.

Third, the bill does not appear to adequately consider the practical realities of the field. Protective agents often operate in dynamic, high-risk environments where flexibility, discretion, and rapid decision-making are essential. Overly prescriptive regulations could compromise safety rather than enhance it.

Finally, there is concern that HF4066 was developed without sufficient input from the professionals who would be most directly affected. Meaningful stakeholder engagement is critical to crafting effective policy, and I urge the Committee to seek broader industry feedback before advancing any legislation of this nature.

For these reasons, I respectfully request that the Committee vote **NO** on HF4066.

Respectfully submitted,

Michael Seman  
CEO  
Midwest Protection Agency Inc.  
Protective Agent License #299  
7012 E. Fish Lake Road  
Maple Grove, MN 55311  
(763) 421-2966 ext. 601

## **MSP Security LLC**

12751 Co Rd 5 Ste 177 Burnsville, MN, 55337 MSPSecured2022@gmail.com

April 13, 2026

### **Chair(s) and Members of the Committee,**

My name is **Lugman Abdi**, and I am the owner of **MSP Security LLC**. We are a small business based in Minnesota, and as a licensed protective agent, I respectfully submit this testimony in **strong opposition to HF4066**.

As a professional dedicated to public safety and industry excellence, I am deeply concerned that the current language of this bill would impose significant, unintended hardships on licensed professionals and the communities we are sworn to protect.

HF4066 introduces regulatory shifts that would increase the burden on protective agent license holders without offering a clear, measurable improvement to public safety. My opposition is based on the following key concerns:

- **Operational Inefficiency:** The proposed changes risk undermining the effectiveness of highly trained agents by imposing duplicative requirements. As professionals already subject to rigorous licensing and oversight, adding further constraints limits our ability to respond to dynamic security needs in a timely and professional manner.
- **Administrative and Financial Burden:** For small businesses like MSP Security LLC, the increased compliance costs and unclear enforcement standards created by HF4066 are particularly taxing. These unnecessary administrative hurdles could force smaller agencies out of the market, ultimately reducing the pool of qualified security professionals available to the state of Minnesota.
- **Disregard for Field Realities:** The private security industry operates in high-risk, fluid environments where discretion and rapid decision-making are paramount. Overly prescriptive regulations often compromise safety rather than enhancing it, as they do not account for the practical realities our agents face daily.
- **Need for Stakeholder Input:** Effective policy requires meaningful engagement with those directly affected. I believe HF4066 would benefit from broader industry feedback to ensure that any legislative changes support—rather than hinder—the safety and viability of the protective agent profession.

For these reasons, I respectfully request that the Committee **vote NO on HF4066**.

Thank you for your time and for considering the impact of this legislation on Minnesota's small business owners and security professionals.

Sincerely,

**Luqman Abdi** Owner, MSP Security LLC 2327



National Association of Security Companies

444 North Capitol Street, NW  
Suite 607  
Washington, DC 20001  
www.nasco.org



**Written Testimony  
of  
Stephen Amitay  
Executive Director and General Counsel  
National Association of Security Companies (NASCO)  
In Opposition to  
Proposed Amendment to HF 4066  
Before the Public Safety and Finance Committee  
April 14, 2026**

The National Association of Security Companies (NASCO) is the nation’s largest contract security association whose member companies employ over 500,000 private security officers across the nation. NASCO companies that are licensed protective agents in the State of Minnesota employ thousands of employees who are performing acts (security services), as defined by Minnesota Statute and Rule, of a protective agent. While Minnesota law (Statutes and Administrative Rules) does not refer to such employees as “security officers” I will be using that term to describe them in my testimony. I will also use the term “security companies” to describe “protective agents.”

For over forty years, NASCO and its member companies have worked throughout the country with state legislators and regulators to improve the licensing, training, screening, and regulation of security officers. NASCO and its members strongly support efficient and commonsense laws and regulations for private security officers which drive employment in the industry, enable companies to meet client needs, and enhances security services at all types of client sites.

As to HF 4066 and specifically the proposed amendment to Bill, NASCO and its member companies operating in Minnesota, for numerous reasons and concerns, strongly oppose it, and we request that the Committee to not advance it.

The original bill and the proposed amendment define and creates five distinct Tiers or classes of security officers in the State. Such an amount of legally “recognized” tiers/classes of security officers, or as the bill puts it “five tiers of security services...(an) employee is assigned to provide” is unprecedented in the United States and will create numerous problems and difficulties for Minnesota security companies, their clients, their officers and state regulators.

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Fundamentally, the proposed tier system, which defines classes of security officers and what duties security officers in those classes are legally able to perform --- based on statutorily specified activities and locations --- fails to understand the nature and realities of private security services. In reality, and currently throughout Minnesota, based on the location, requirements of clients, and other factors, unarmed security officers at client sites are performing duties, that classify them in two and sometimes all three of the distinct “Tiers” for unarmed officers. (Such as at a hospital). The scenarios of where officers would be in cross-tier posts or situations are endless. To put into law, as the Bill intends, such limits on what services a specific security officer can provide and where they can provide them is unprecedented, unrealistic, unreasonable and unwise. As an example, a Tier 1 security officer that is doing “event access control” at a concert will be prohibited from also being able to walk around “patrol” the concert, as that is only allowed in Tier 2. The bottom line is that security officers do not work in situations and locations where the actions they may take can be predetermined, yet alone by law. The lack of flexibility that the Tiers will create is not only (again) unprecedented, unrealistic and unreasonable, but it will create numerous problems and challenges for companies, officers and clients.

The bill will restrict employment opportunities for Minnesota residents who are security officers and will no longer be able to work at sites that do not match their Tier. The bill will make it harder for companies to quickly add officers at a site unless they already have extra officers in the appropriate Tier available. Likewise, the ability to supply replacement officers at a location will be restricted. These limitations on officer posting will particularly impact smaller security companies in Minnesota. And if a security officer wanted job flexibility, could that officer be “classified” in more than one Tier? What will that require, three separate training courses? Also, the bill’s Tiers for armed work are not in line with many current posts. They mention only “high risk” environments (such as “armored transport” and “critical infrastructure”) or armed “executive protection.” What about armed officers who work at museums, high-end retail, commercial office buildings, government building, hospitals, schools, etc. In theory, a multitude of Tiers could be created to cover all client sites and job roles, but that is not reasonable or reality. Accordingly, all other states and jurisdictions in the U.S. that license/regulate security officers/security services primarily have two classes of officers, unarmed and armed. Then through state training requirements and company training that is site and contract specific, the officers in those two general classes are provided with the training and certifications they need to safely and effectively perform their duties at the site.

One extremely concerning and confusing element of the bill is that only officers who have a Tier 3 classification can work at a “high-risk” building. What is a “high risk” building? Who will determine whether a building is “high risk” or not? Can a building go from Tier 2 to Tier 3 or vice versa? Will the Board, who will be overseeing and regulating the Tier system, be required to conduct risk assessments of all buildings in the State to determine if they are “high risk” or not? While that question is somewhat farcical, the bottom line though is that when an incident involving a security officer occurs at a building in which someone is injured or killed, if that officer is not

Tier 3, there is no doubt that a lawsuit will be brought against the officer's employer claiming that by virtue that something bad happened at the building, that building was "high risk" and thus should have required Tier 3 officers. (e.g. the deadly shooting in NYC at the office building housing the NFL headquarters, should that unarmed guard's assignment been considered have been considered Tier 2 or Tier 3). Companies will indeed look to the Board on guidance/rules related to what is "high risk" or not.

The bill also requires that employers "must attempt to match an employee's skills and training with their tier of security service the employee is assigned to provide." What does that actually mean? Currently, the state-required training that employers must provide to employees must be certified by the Board. Employers cannot change that training. And as mentioned, employers already offer site and contract-specific training to their officers. However, this kind of "must attempt" language opens up another way for security firms to face lawsuits if an unforeseen event involves a security officer.

One big issue with the bill, and likely to create serious headaches and work for the State Board, is how to implement, oversee and regulate the Tiers. How will the Board know if an unarmed security officer at a building should be Tier 1, 2, or 3? The Board will not only have to create rules requiring that companies provide their security offices with ID's denoting their Tier(s), but the Board will also have to know what the Tier is for the site where an officer is working. How will the Board keep track of all officers and their Tiers. Can officers switch and/or add Tiers?

NASCO and its members are fully supportive of appropriate and effective regulation of private security companies and their officers, as well as the proper and effective training of security officers. Unlicensed security companies and untrained officers are the bane of the industry and NASCO will work with any and every legislator and regulator in the country and in Minnesota to find ways to address these two problems.

However, HF 4066, in its original form and as amended, will only create serious issues and problems for private security companies, officers, clients and regulators in Minnesota, and NASCO urges the Committee not forward the bill or the amended bill.



## Security Specialists Incorporated

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April 13, 2026

Ellen McDaniel, Committee Administrator  
State of Minnesota House of Representatives

Dear Ellen:

My name is Mark Ehlenz, CEO of Security Specialists Incorporated, license 224. I am responding to the proposed Bill HF4066.

Security Specialists is an event, festival and concert security company. All our staff are part-time and pick and choose when they can and want to work. All our new staff participate in a 12-hour pre-assignment training course prior to working any security jobs and all seasoned staff attend a 6-hours Continuous Training course every year thereafter.

This proposed Bill HF4066 with the requirement of 40 hours of training will put us out of business. Our staff all have full-time jobs outside of working security for our company. We currently provide the required training on Saturdays and Sundays. If our staff were required to take vacation from their full-time jobs to do part-time security, they most likely will not do it.

If we were required to provide the 40 hours, the additional cost of providing training will have to be passed on to our customers. Many of the events and festivals that we do are charities, town events and non-profit organizations. That would put a huge strain on their budgets.

My final point is the current training requirements cover what our company needs to cover to do the job they are hired to do. The current state statute is the minimum amount of training that security companies are required to provide. Any company can provide additional training if they choose. In the world of events, festivals and concerts, we constantly train on new thoughts and retrain what was taught during training.

Security Specialists Incorporated strongly recommend leaving the training requirements as currently stated in State Statutes. It is working fine and does not require change.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Ehlenz", written over a circular scribble.

Mark Ehlenz, CEO  
Security Specialists Incorporated

**John Luke Hutsell  
Regional Vice President  
GardaWorld  
Written Testimony in Opposition to HF 4066 as Amended  
House Committee on Public Safety and Finance  
April 14, 2026**

My name is John Luke Hutsell, and I am the Regional Vice President for GardaWorld Security Services. Our Minnesota office is located at 1700 S. Highway 36, Suite 650, Roseville, MN 55113.

In Minnesota, GardaWorld employs hundreds of security officers who are providing private security services throughout the State of Minnesota, with a significant concentration in the Twin Cities. We maintain a strong presence in the downtown commercial real estate sector and provide security services for the majority of parking structure in the area.

We agree wholeheartedly that proper training for security officers is essential. GardaWorld already maintains a robust training program designed to prepare officers for the duties of their assigned posts. This includes all state-certified training requirements, as well as site-specific, client-specific, and contract-specific training, along with ongoing training to ensure continued compliance with state standards. In addition, we provide further training tailored to individual sites and contracts—training that does not align neatly with the proposed tiered structure outlined in HF 4066.

House File 4066 as amended fundamentally misunderstands the realities of the security officer role. There are no other licensing systems in Minnesota that impose this number of discrete classifications. Peace officers, for example, operate under a single license. One can easily imagine the regulatory confusion and operational burden that would arise if policing were subject to multiple license tiers.

HF 4066 effectively creates multiple, separate classes of unarmed security officers. In practice, however, unarmed officers frequently perform duties that would fall across all proposed tiers, often within a single assigned post. The bill assumes that officers work at fixed, consistent posts that can be predetermined in advance. This assumption does



not reflect the operational realities of private security services. In fact, the opposite is true: employers must retain significant flexibility in how officers are assigned and deployed. Client contracts for unarmed security services regularly span two or more of the proposed unarmed tiers.

These highly prescriptive classifications would severely limit operational flexibility and create numerous unnecessary challenges, including:

1. Discouraging individuals from entering the security profession if they are restricted to working only one type of site.
2. Creating staffing shortages at certain sites due to artificial licensing limitations.
3. Severely restricting our ability to surge officers to locations that experience sudden or increased security needs.
4. Greatly limiting the ability to backfill posts when officers call out sick or require last-minute personal time off.

Taken together, these impacts would significantly harm the ability of private security companies to provide effective and reliable security services to Minnesota businesses. More concerning still, the bill would likely force small security employers out of business altogether.

I am confident that well-intentioned stakeholders are advocating for these changes; however, from an operational standpoint, they are unnecessary and counterproductive. As you consider this legislation, I respectfully ask you to reflect on the following unresolved questions:

1. If an officer seeks to be classified in more than one tier, would that officer be required to complete training for each tier?
2. How is a “high-risk” building defined?
3. Who determines whether a building qualifies as high risk, thereby limiting staffing exclusively to Tier 3 officers rather than Tier 2?
4. What does it mean for license holders to “must” attempt to match an employee’s training to their tier, given that only Board-certified training is permitted in Minnesota and companies cannot modify training curricula based on these new classifications?
5. Why are proprietary (in-house) security officers excluded entirely, leaving a significant gap in training requirements and oversight?

The concerns outlined above are shared by many—if not all—private security employers operating in Minnesota. GardaWorld, along with several other firms, stands



ready to work collaboratively with you and your team to ensure a clearer and more accurate understanding of security officer duties and training requirements.

At this time, however, we strongly recommend that HF 4066 not move forward in its current form.

Please feel free to contact me directly at 314-323-0262 if you would like to discuss these concerns further. Thank you for your attention to this important matter.