



Maryland Investigators and Security Association
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Thank you for allowing me to comment on this issue. My name is Evan Avnet, and I serve as the President of the Maryland Investigators and Security Association, which represents numerous licensed private detective and security agencies across Maryland.

We have been facing an ongoing challenge that we hope this bill will address. Since the establishment of the Maryland Cannabis Administration (MCA), formerly known as the Maryland Medical Cannabis Commission, the security industry has encountered escalating costs associated with providing services to the cannabis sector.

Our industry is licensed by the Maryland State Police Licensing Division in accordance with COMAR regulations. However, MCA has gradually expanded its authority beyond its original mandate of regulating the cannabis industry to include oversight of the security industry. Currently, our agencies must obtain licensure from the Maryland State Police Licensing Division, which involves licensing fees and fingerprinting for the agency licensee. Most agency licensees are former police officers, as it is required that they have five years of prior law enforcement experience or five years as a private detective to qualify for a license. Additionally, each individual security officer employed by our agencies must be fingerprinted and licensed.

MCA now requires an additional "registration"—which I will refer to as a license—for each agency at an added cost, along with fingerprinting of corporate officers. Failure to register with MCA precludes agencies from conducting business with the cannabis industry. Furthermore, MCA mandates that each security officer be fingerprinted and licensed by them. The security agency must also submit operational and security plans, which are subject to Public Information Act requests. Additionally, any security officer who has not been licensed within six months of the agency's reapplication must be re-fingerprinted and re-licensed, even if their MCA card has not expired.

No other industry in Maryland is subjected to dual licensure by two separate state agencies for performing the same function. This re-licensing requirement, termed registration by MCA, duplicates the existing requirements of MSP, thereby imposing unnecessary costs on security agencies for services they are already licensed to perform. These redundant costs, including license fees, security officer licenses, and fingerprinting fees, create a prohibitive financial burden.

We seek your assistance in mitigating these redundant costs to the security industry, enabling us to continue providing essential security services to protect the patrons and staff of these locations.



Evan Avnet
President
Maryland Investigators and Security Association