



BUREAU OF SECURITY AND INVESTIGATIVE SERVICES

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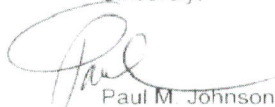
Barry A. Bradley
Bradley & Gmelich
535 North Brand Boulevard, 9th Floor
Glendale, CA 91203

Dear Mr. Bradley 

As a follow-up to your question of whether a PPO can rightfully use a Professional Employees Organization (PEO) for running payroll and insurance through an outside company, use of a PEO does not violate the Private Security Services Act. A person or company who is employed by a PPO to perform functions of payroll and insurance is not required to have a PPO or Security Guard License/Registration since they do not perform the duties outlined in the definitions stated in Business and Professions Code Section 7582.1(a). According to my policy staff who has spoken with BSIS Legal Counsel Dana Winterrowd about this matter, he concurs with my opinion.

Should you have any further questions regarding this matter, please feel free to give me a call.

Sincerely,


Paul M. Johnson
Chief

PMJ dsj