

California Department of Justice
DIVISION OF LAW ENFORCEMENT
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INFORMATION BULLETIN

Subject:

Update to Assignment of Firearms to Licensed Security Guards by Private Patrol Operators

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Contact for information:

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(916) 227-7527**

TO: All California Law Enforcement Agencies, California Firearm Dealers, Private Patrol Operators, and all other interested persons

This Bulletin provides an update regarding Assembly Bill (AB) 2220 (Stats. 2014, ch. 423) and the mandated Department of Justice (DOJ) system modifications.

SUMMARY OF AB 2220 (Stats. 2014, ch. 423)

AB 2220 became effective July 1, 2016, and established procedures allowing a Private Patrol Operator (PPO) business entity to be a registered owner of a firearm. Additionally, AB 2220 allows a PPO to assign a firearm to a security guard and to designate a firearm custodian.

RECORDS OF SALE SUBMITTED TO THE DEPARTMENT OF JUSTICE UPDATE

The Dealer Record of Sale (DROS) Entry System (DES) remains incapable of recognizing a business as a firearm purchaser or owner, and modifications to both DES and the Automated Firearm System (AFS) are required to list a PPO as the purchaser and registered owner of a firearm. The DOJ continues to work towards implementing these modifications and developing a process for PPOs to submit a Certificate of Assignment to identify in AFS the PPO employee who has been assigned a firearm owned by the PPO. (Pen. Code § 28012.)

Pending implementation of these modifications, until further notice, California firearms dealers are advised to continue completing the current DROS process to the owner or manager of the PPO for any firearms being purchased on behalf of the business. The PPO is responsible for maintaining their own firearm assignment records.

LAW ENFORCEMENT CONTACT

Until modifications to the DES and AFS systems are complete, law enforcement personnel may continue to encounter armed security guards who have the requisite permits and qualifications to carry a firearm in the course of their duties as security guards, but who are not the registered owners of the firearm. A security guard licensed to carry a firearm by the Bureau of Security and Investigative Services (BSIS), is eligible to be assigned a business-owned firearm by a PPO for whom they are employed. An assignment of a firearm to an eligible and licensed security guard by a PPO is not a violation of Pen. Code § 27545. (Pen. Code §§ 28010, 28012, 28018.)

LAW ENFORCEMENT CONTACT CONTINUED

Where it can be determined that a firearm is registered to the security guard's employing PPO and properly assigned to the security guard, law enforcement agencies are encouraged to refrain from taking any action to confiscate the firearm or arrest the security guard for offenses related to possession of a firearm by an individual other than the registered owner.

If you have any questions regarding this Information Bulletin, please contact the Department of Justice, Bureau of Firearms at (916) 227-7527.