

Burgos, Alexander N

Subject: FW: [External] Rules Review Commission Committee meeting Sept 29 2026

From: rrc.comments <rrc.comments@oah.nc.gov>

Sent: Wednesday, September 16, 2026 9:27 AM

To: Keith Williams | Executive Director | Chief of Police | SPSP | SCP <kwilliams@southeasternus.org>

Cc: Ascher, Seth M <seth.ascher@oah.nc.gov>; Burgos, Alexander N <alexander.burgos@oah.nc.gov>

Subject: Re: [External] Rules Review Commission Committee meeting Sept 29 2026

Good morning,

I've cc'd my fellow Commission Counsel, Seth Acher, who was assigned the DOJ-Company and Campus Police Program periodic review report that is on the agenda for the RRC meeting on September 29. I recommend reviewing our OAH website that explains the periodic review and expiration of existing rules process <https://www.oah.nc.gov/rules-division/periodic-review-and-expiration-existing-rules>.

"As reports are received by agencies, OAH-RRC will post copies of the reports on the Commission's website. All comments on the individual rules contained in the reports must be directed to the agency contact who is listed below the link to the report. Therefore, comments should not be sent directly to the Rules Review Commission or its staff. Any such comments directed to the Commission or its staff will not be considered as official comments. Instead, the public must send the comments to the individual identified by the agency." The two rules you have referenced are contained on the periodic review report, however, those individual rules will not be reviewed by the RRC at the September meeting. The RRC will only be deciding whether all the rules on the report have been properly designated on the report. All rules on the report designated as "Necessary" will be readopted by the agency in the coming months. Therefore, I suggest that you continue to monitor when the agency's rules have been returned to us by the General Assembly for readoption. Once that occurs, that will be the appropriate time for the public to comment on individual rules and request to speak at an RRC meeting. I hope this explanation addresses your concerns. Please let me know if you have any further questions.

Thanks,

Travis C. Wiggs

Rules Review Commission Counsel

Office of Administrative Hearings

Telephone: 984-236-1929

Email: travis.wiggs@oah.nc.gov

From: Keith Williams | Executive Director | Chief of Police | SPSPG | SCP <kwilliams@southeasternus.org>

Sent: Tuesday, September 15, 2026 9:17 PM

To: rrc.comments <rrc.comments@oah.nc.gov>

Subject: Re: [External] Rules Review Commission Committee meeting Sept 29 2026

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Dear Mr. Wiggs,

Thank you for the update.

According to our records, the rules were filed on August 17th, and the documentation can be viewed here: <https://www.oah.nc.gov/12-ncac-02i-and-02j/download?attachment>

Based on this filing, they were scheduled for review at the September 29, 2026 meeting. Could you please double-check the schedule to confirm?

Regards,

Keith Williams

Executive Director | Southeastern Public Safety Group, Inc.

Chief of Police | Southeastern Company Police

704-394-1500 ext. 2

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On Tue, Sep 15, 2026 at 1:55 PM rrc.comments <rrc.comments@oah.nc.gov> wrote:

Mr. Williams,

Thank you for sending your rebuttal. Please reread my message below. The rules for which you have commented have not been submitted to the RRC for review at our meeting on September 29, 2026. We are not able to add your comments and requests to speak to the agenda for September because the rules have not been sent to us by the agency.

You will have to resend your comments and requests to speak after 12 NCAC 02I .0304 and 12 NCAC 02I .0203 has been filed with us for review at an upcoming RRC meeting.

Thanks,

Travis C. Wiggs

Rules Review Commission Counsel

Office of Administrative Hearings

Telephone: [984-236-1929](tel:984-236-1929)

Email: travis.wiggs@oah.nc.gov

From: Keith Williams | Executive Director | Chief of Police | SPSG | SCP <kwilliams@southeasternus.org>

Sent: Tuesday, September 15, 2026 11:30 AM

To: rrc.comments <rrc.comments@oah.nc.gov>

Subject: Re: [External] Rules Review Commission Committee meeting Sept 29 2026

You don't often get email from kwilliams@southeasternus.org. [Learn why this is important](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Mr. Wiggs,

Thank you for your response.

Please see the attached document, which contains my separated rebuttal. Additionally, I would like to request time to schedule five speakers on this matter for the upcoming meeting.

Regards,

Keith Williams

Executive Director | Southeastern Public Safety Group, Inc.

Chief of Police | Southeastern Company Police

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September 9, 2026

Rules Review Commission

c/o Office of Administrative Hearings — Rules Division
1711 New Hope Church Road | Raleigh, NC 27609
oah.rules@oah.nc.gov

RE: Written Objection and Rebuttal — Rules Do Not Conform to Law

12 NCAC 02I .0203(a)(8) and .0304(4)(5)(7) | RRC September 2026 Periodic Review

Dear Rules Review Commission:

I am Keith Williams, Chief of a Company Police Agency certified under G.S. Chapter 74E and a resident of North Carolina. I submitted a public comment during the March 13 – May 19, 2026 comment period identifying direct conflicts between 12 NCAC 02I .0203(a)(8) and .0304(4)(5)(7) and the statutes those rules are issued under. The agency's August 17, 2026 response did not address those conflicts. I submit this rebuttal under § 150B-21.3A(c)(2).

I. THREE QUESTIONS THE COMMISSION SHOULD ASK

The statutory nonconformity in 12 NCAC 02I .0304 is not complex. The Commission should ask three plain questions.

First — Officer responding to their own jurisdiction. G.S. 20-125(b). The commission is valid, the call is real, the equipment is on the vehicle. Responding to an emergency within one's own commissioned jurisdiction is performing law enforcement duties from the moment of dispatch. The statute contains no property-line restriction. The rule imposes one. 12 NCAC 02I .0304 does not conform to G.S. 20-125(b) as enacted.

Second — City council mutual aid. G.S. 74E-6(h). Elected officials deliberated, voted, and executed the agreement. Those officers have the same standing as a municipal police department. Under G.S. 160A-288 they have the same powers, rights, and immunities. The rule denies the equipment those powers include. 12 NCAC 02I .0304 does not conform to G.S. 74E-6(h) as enacted.

Third — Sheriff or chief requests assistance. G.S. 74E-6(i). The statute says shall — mandatory, not discretionary. Same powers. The rule prohibits equipment activation in the exact scenario the statute governs. 12 NCAC 02I .0304 does not conform to G.S. 74E-6(i) as enacted.
Fourth — Sworn officer calling sworn officer, same agency, official duties. G.S. 20-125(b) and the non-sworn comparison. Volunteer fire, EMS, organ procurement — none holding a

commission, none with 48-hour BLET EVOC — all unrestricted. The sworn officer cannot. The statute asks only whether the operator is actively engaged in an authorized purpose. For every non-sworn entity the answer is yes. For the sworn company police officer performing official duties the answer is unquestionably yes.

The rule answers all four questions the wrong way. The statutes the legislature actually wrote grant the authorization. The rule takes it away. G.S. 74E-6(h), G.S. 74E-6(i), and G.S. 20-125(b) are not ambiguous. They speak with one voice: company police officers operating under lawful authorization shall have the same powers and the same equipment access as the officers alongside whom they serve. The rule contradicts all four. That is the definition of nonconformity under § 150B-21.9(a)(1) and (3) before this Commission today, uncontested on the merits.

II. THE AGENCY’S RESPONSE FAILS § 150B-21.3A(c)(1)

The agency must prepare a “brief response addressing the merits of each comment.” The August 17, 2026 response reads in full on substance:

“...the proposed amendments... do not deem the rules to be obsolete, redundant, or otherwise not needed. Therefore, the Campus and Company Police Program upholds the Initial Agency Determinations... are Necessary.”

— Randy Munn, Company and Campus Police Administrator, August 17, 2026

My comment raised statutory conformity under § 150B-21.9(a)(1) and (3). The agency answered whether the rules are obsolete. Those are different questions. The response does not contain the words G.S. 74E-6(h), G.S. 74E-6(i), or G.S. 20-125(b) — the three statutes at the center of this comment. That is not a response to the merits.

III. .0203(a)(8) DOES NOT CONFORM TO G.S. 74E-4

G.S. 74E-4 vests company police certification authority in the Attorney General. The current rule requires signed consent from the District Attorney and Sheriff of each county. Chapter 74E does not authorize that requirement. The rule transferred a certification veto to local officials who play no statutory role in the AG’s certification process, exceeding the agency’s delegated authority under § 150B-21.9(a)(1).

IV. PROPOSED CONFORMING RULE TEXT — UNCONTESTED ON THE MERITS

A. 12 NCAC 02I .0203(a)(8)

~~(8) a signed statement from or letters signed by~~ **(8) written notice provided to** the District Attorney and the Sheriff of each county in which the company police agency seeks to operate.

~~acknowledging that the agency will be operating within their jurisdiction and consenting to such operation;~~

Conforms to: G.S. 74E-4. Certification authority restored to the AG. Notice preserved.

B. 12 NCAC 02I .0304(4) — Blue Lights

(4)... activating or operating any blue or red light... ~~when outside of the property jurisdiction limitations specifically described under G.S. 74E-6~~ unless one or more of the following conditions is satisfied:

(a) the officer is within the property jurisdiction limitations specifically described under G.S. 74E-6;

(b) when in continuous or immediate pursuit of a person for an offense committed upon real property owned by or in the possession or control of the employer, or real property under contract for on-site security services; or

(c) during the transportation of an arrestee in the company police agency's custody;

(d) when the officer is actively responding to an emergency call, crime in progress, or urgent law enforcement need within the officer's property jurisdiction, or responding to assist an officer of the same agency in performing official duties, and is traveling to reach that location, provided such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

(e) when the officer is actively engaged in performing official duties pursuant to a mutual aid agreement under G.S. 74E-6(h), and such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b); or

(f) when the officer is actively engaged in providing temporary assistance to a requesting law enforcement agency pursuant to G.S. 74E-6(i), and such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

Conforms to: G.S. 74E-6(h) (municipal governing board or county mutual aid); G.S. 74E-6(i) (as-needed assistance — same powers); G.S. 20-125(b) (functional standard). Existing exceptions (a)(b)(c) unchanged. Jurisdiction: G.S. 74E-6(g) in full force.

C. 12 NCAC 02I .0304(5) — Siren

(5)... activating or operating a siren... ~~unless in immediate and continuous pursuit~~ unless one or more of the following conditions is satisfied:

(a) when in immediate and continuous pursuit of any person for an offense which occurred within the officer's property jurisdiction as defined under G.S. 74E-6;

(b) when the officer is actively responding to an emergency call, crime in progress, or urgent law enforcement need within the officer's property jurisdiction, or responding to assist an officer of the same agency in performing official duties, and is traveling to reach that location, provided such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

(c) when the officer is actively engaged in performing official duties pursuant to a mutual aid agreement under G.S. 74E-6(h), and such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b); or

(d) when the officer is actively engaged in providing temporary assistance to a requesting law enforcement agency pursuant to G.S. 74E-6(i), and such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

Conforms to: Same statutory basis as .0304(4). Parallel structure.

D. 12 NCAC 02I .0304(7) — Vehicular Pursuit and Emergency Vehicle Operation

(7)... except as provided in items ~~(4)(a) and (4)(b) of this Rule~~ (4)(a) through (4)(f) and items (5)(a) through (5)(d) of this Rule, and provided such operation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

Conforms to: Conforms item (7) to the full amended exception set. Internal consistency across all three provisions.

V. REQUESTED ACTION

1. Find this comment has merit under § 150B-21.9(a)(1) and (3): 12 NCAC 02I .0304(4)(5)(7) does not conform to G.S. 74E-6(h), G.S. 74E-6(i), or G.S. 20-125(b); and 12 NCAC 02I .0203(a)(8) does not conform to G.S. 74E-4;
2. Determine the agency's August 17, 2026 response fails § 150B-21.3A(c)(1) by addressing only the necessary-versus-unnecessary question while leaving the statutory conformity arguments entirely unaddressed; and
3. Direct the Company Police Administrator to initiate rulemaking to amend 12 NCAC 02I .0203(a)(8) and .0304(4)(5)(7) consistent with Section IV of this rebuttal.

A governing board voted. A law enforcement agency head placed a call. The statutes granted full authority to execute their official duties for the purpose of life and safety. The rule stripped the equipment. At every point where the law has been satisfied, the rule produces an outcome the law did not intend and cannot support. The Commission's independent review exists to correct exactly this.

Respectfully submitted,

/s/ Keith Williams

Keith Williams

| NC Resident | Company Police Chief

Enclosures: Exhibit A — Original Public Comment with § 150B-21.9(a) Analysis | Exhibit B — Agency Response, Randy Munn, August 17, 2026 | Exhibit C Petitions for Legislative Review

EXHIBIT 1

OBJECTION TO AGENCY



EXHIBIT 1
k will <secompanypolice@gmail.com>

Comments on Rule amendment For Company / Campus Police

k will <secompanypolice@gmail.com>

Tue, May 19, 2026 at 1:30 AM

To: HCardoza@ncdoj.gov, "Munn, Randy" <rmunn@ncdoj.gov>

Bcc: Jeremy Adams <jadams@bafolk.com>, Iratliff@me.com, Matthew Noel <companypolice@neverquitservices.com>, Bartlett Wilson <bart.wilson.jr@gmail.com>, Robert Qualkenbush <Robert.Qualkenbush@aus.com>, William Comer <bcomer@northstatesecuritygroup.com>, Delta Police Chief <richardaepley@yahoo.com>, Michael Grisanti <mgrisanti@precisionprotect.us>

Holly Cardoza

I am submitting this comment in two capacities. First, as a resident of the State of North Carolina, I am a member of the public directly affected by the rules governing company police operations in this State. Second, as Chief of a Company Police Agency operating under G.S. Chapter 74E and 12 NCAC 02I, I administer and operate under the rules that are the subject of this comment on a daily basis. I have personal, professional, and public-safety knowledge of the operational consequences of these rules as currently written. I submit this comment during the open agency comment period and respectfully request that the Company Police Administrator initiate rulemaking to amend **12 NCAC 02I .0203(a)(8)** and **12 NCAC 02I .0304(4), (5), and (7)** as described and supported herein.

This comment objects to the current text of both rules as written and as applied to the specific operational scenarios identified below. Both rules, in their current form, conflict with the statutes they are issued under, impose restrictions that the General Assembly has not authorized, and create measurable public safety deficits without any corresponding regulatory benefit. A proposed redline amendment and full legal analysis prepared in conformity with the § 150B-21.9(a) review standards are attached to this comment and are incorporated herein by reference. Please See below Attached Comments.

Regards,

Keith Williams

Executive Director| Southeastern Public Safety Group, Inc.

Chief of Police| Southeastern Company Police

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EXHIBIT 2

AGENCY RESPONSE

EXHIBIT 2

G.S. 150B-21.3A Report for 12 NCAC 02, OFFICE OF THE ATTORNEY GENERAL

Agency - Department of Justice

Comment Period -March 13, 2026 - May 19, 2026

Date Submitted to APO- Filled in by RRC staff

Subchapter	Rule Section	Rule Citation	Rule Name	Date and Last Agency Action on the Rule	Agency Determination [150B-21.3A(c)(1)a]	Required to Implement or Conform to Federal Regulation [150B-21.3A(d)(1)]	Federal Regulation Citation	Public Comment Received [150B-21.3A(c)(1)]	Agency Determination Following Public Comment [150B-21.3A(c)(1)]
SUBCHAPTER 21 - COMPANY AND RAILROAD POLICE	SECTION .0100 - GENERAL PROVISIONS	12 NCAC 021 .0101	LOCATION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0102	PURPOSES	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0103	ADMINISTRATIVE STAFF	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0104	DEFINITIONS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
	SECTION .0200 - COMMISSIONING	12 NCAC 021 .0202	MINIMUM STANDARDS FOR COMPANY POLICE OFFICERS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0203	APPLICATION FOR COMPANY POLICE AGENCY	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		Yes	Necessary
		12 NCAC 021 .0204	APPLICATION FOR COMPANY POLICE OFFICER	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0205	BACKGROUND INVESTIGATION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0206	FEE	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0208	OATH	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0210	LIABILITY INSURANCE	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0211	SUSPENSION, REVOCATION OR DENIAL OF AGENCY CERTIFICATION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 021 .0212	SUSPENSION, REVOCATION, OR DENIAL OF OFFICER COMMISSION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary

G.S. 150B-21.3A Report for 12 NCAC 02, OFFICE OF THE ATTORNEY GENERAL

Agency - Department of Justice

Comment Period -March 13, 2026 - May 19, 2026

Date Submitted to APO- Filled in by RRC staff

Subchapter	Rule Section	Rule Citation	Rule Name	Date and Last Agency Action on the Rule	Agency Determination [150B-21.3A(c)(1)a]	Required to Implement or Conform to Federal Regulation [150B-21.3A(d)]	Federal Regulation Citation	Public Comment Received [150B-21.3A(c)(1)]	Agency Determination Following Public Comment [150B-21.3A(c)(1)]
		12 NCAC 021 .0213	PERIOD OF SUSPENSION, REVOCATION OR DENIAL	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
		12 NCAC 021 .0214	SUMMARY SUSPENSIONS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
	SECTION .0300 - CONDUCT OF COMMISSIONED POLICEMEN	12 NCAC 021 .0301	TENURE	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
		12 NCAC 021 .0304	PROHIBITED ACTS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		Yes	Necessary
		12 NCAC 021 .0305	TRANSFERS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
	SECTION .0500 - AGENCY RECORD RETENTION	12 NCAC 021 .0501	AGENCY RETENTION OF RECORDS OF COMMISSION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
SUBCHAPTER 021 - CAMPUS POLICE	SECTION .0100 - GENERAL PROVISIONS	12 NCAC 021 .0101	LOCATION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
		12 NCAC 021 .0102	PURPOSES	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
		12 NCAC 021 .0103	ADMINISTRATIVE STAFF	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
		12 NCAC 021 .0104	DEFINITIONS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
	SECTION .0200 - COMMISSIONING	12 NCAC 021 .0201	MINIMUM STANDARDS FOR CAMPUS POLICE OFFICERS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
		12 NCAC 021 .0202	APPLICATION FOR CAMPUS POLICE AGENCY	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary
		12 NCAC 021 .0203	APPLICATION FOR CAMPUS POLICE OFFICER	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016	Necessary	No		No	Necessary

G.S. 150B-21.3A Report for 12 NCAC 02, OFFICE OF THE ATTORNEY GENERAL

Agency - Department of Justice

Comment Period -March 13, 2026 - May 19, 2026

Date Submitted to APO - Filled in by RRC staff

Subchapter	Rule Section	Rule Citation	Rule Name	Date and Last Agency Action on the Rule	Agency Determination [150B-21.3A(c)(1)a]	Required to Implement or Conform to Federal Regulation [150B-21.3A(d)]	Federal Regulation Citation	Public Comment Received [150B-21.3A(c)(1)]	Agency Determination Following Public Comment [150B-21.3A(c)(1)]
		12 NCAC 02.0204	BACKGROUND INVESTIGATION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0205	FEE	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0206	OATH	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0207	LIABILITY INSURANCE	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0208	SUSPENSION, REVOCATION OR DENIAL OF AGENCY CERTIFICATION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0209	SUSPENSION, REVOCATION, OR DENIAL OF OFFICER COMMISSION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0210	PERIOD OF SUSPENSION, REVOCATION OR DENIAL	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0211	SUMMARY SUSPENSIONS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
SECTION .0300 - CONDUCT OF COMMISSIONED POLICEMEN		12 NCAC 02.0301	TENURE	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0302	PROHIBITED ACTS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0303	TRANSFERS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary
		12 NCAC 02.0304	BADGES, UNIFORMS, VEHICLES AND OFFICER IDENTIFICATION	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 4, 2016.	Necessary	No		No	Necessary

Proposed Rule Amendments — 12 NCAC 02I .0203(a)(8) and .0304(4)(5)(7)

Company Police — Prohibited Acts & Agency Approval Requirements | Statutory Conformity Amendment

Rules	Governing Auth.	Aligning Statute	Change Type	Jurisdiction	Equipment
12 NCAC 02I .0203(a)(8); .0304	G.S. 74E-4; 74E-6(h)(i)	G.S. 20-125(b)	Amendment— Partial Repeal	None— Equipment Use Only	All CPO Vehicles Equipped

REDLINE KEY: ~~Stricken red = deleted~~ **Bold underlined green = inserted** Plain = unchanged

I. PROPOSED REDLINES

A. 12 NCAC 02I .0203 — APPLICATIONS FOR CERTIFICATION [Item (a)(8) only]

(a) An application for company police certification shall include all of the following:

~~(8) a signed statement from or letters signed by~~ **(8) written notice provided to** the District Attorney and the Sheriff of each county in which the company police agency seeks to operate, ~~acknowledging that the agency will be operating within their jurisdiction and consenting to such operation;~~

Note: The current requirement that the District Attorney and Sheriff sign or consent to company police operation cedes final certification authority to local elected officials without statutory basis. G.S. 74E-4 vests that authority exclusively in the Attorney General's office. This amendment preserves the notice function — keeping local officials informed — while restoring the AG as the sole certifying authority the General Assembly intended.

B. 12 NCAC 02I .0304 — PROHIBITED ACTS [Items (4), (5), and (7)]

All company police officer vehicles are equipped with standard emergency warning equipment. This amendment addresses only the lawful *use* of that equipment — not its presence. Items (4) and (5) are restructured; item (7) is conformed to the same exceptions.

No company police officer shall engage in any of the following acts:

(4) activating or operating any blue or red light when operating any motor vehicle used primarily by any company police agency in the performance of official duties ~~when outside of the property jurisdiction limitations specifically described under G.S. 74E-6~~ **unless one or more of the following conditions is satisfied:**

(a) the officer is within the property jurisdiction limitations specifically described under G.S. 74E-6;

(b) when in continuous or immediate pursuit of a person for an offense committed upon real property owned by or in the possession or control of the employer, or real property under contract for on-site security services; or

(c) during the transportation of an arrestee in the company police agency's custody;

(d) when the officer is actively responding to an emergency call, crime in progress, or urgent law enforcement need within the officer's property jurisdiction, or responding to assist an officer of the same agency in performing official duties, and is traveling to reach that jurisdiction, provided such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

(e) when the officer is actively engaged in performing official duties pursuant to a mutual aid agreement under G.S. 74E-6(h), and such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b); or

(f) when the officer is actively engaged in providing temporary assistance to a requesting law enforcement agency pursuant to G.S. 74E-6(i), and such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

(5) activating or operating a siren when operating any motor vehicle used primarily by any company police agency in the performance of official duties when outside of the property jurisdiction limitations specifically described under G.S. 74E-6 ~~unless in immediate and continuous pursuit~~ **unless one or more of the following conditions is satisfied:**

(a) when in immediate and continuous pursuit of any person for an offense which occurred within the officer's property jurisdiction as defined under G.S. 74E-6;

(b) when the officer is actively responding to an emergency call, crime in progress, or urgent law enforcement need within the officer's property jurisdiction, or responding to assist an officer of the same agency in performing official duties, and is traveling to reach that jurisdiction, provided such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

(c) when the officer is actively engaged in performing official duties pursuant to a mutual aid agreement under G.S. 74E-6(h), and such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b); or

(d) when the officer is actively engaged in providing temporary assistance to a requesting law enforcement agency pursuant to G.S. 74E-6(i), and such activation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);

(7) initiating or engaging in a vehicular pursuit or emergency vehicle operation outside of the property jurisdiction limitations described under G.S. 74E-6 ~~except as provided in items (4)(a) and (4)(b) of this Rule~~ **except as authorized under items (4)(a) through (4)(f) and items (5)(a) through (5)(d) of this Rule, and provided such operation is necessary and reasonable under the circumstances, consistent with G.S. 20-125(b);**

II. AGENCY STATEMENT — § 150B-21.9(a) REVIEW CRITERIA

Both proposed amendments satisfy all four criteria of § 150B-21.9(a). Each criterion is addressed below in sequence. The Commission’s review is confined to these four standards; questions of the quality or efficacy of the rules are outside its scope. On each applicable standard, the amendments are legally required by the statutes the rules already cite, supported by a clear equipment-safety record, and procedurally compliant with Part 2 of Article 2A.

CRITERION 1 — WITHIN DELEGATED AUTHORITY § 150B-21.9(a)(1) · G.S. 74E-4 · G.S. 74E-6

A proposed rule satisfies Criterion 1 when it falls within the authority the General Assembly has delegated to the agency. Both amendments not only fall within existing delegated authority — each corrects a rule that currently operates *outside* that authority.

.0203(a)(8) — AG Certification Authority: G.S. 74E-4 vests company police certification authority exclusively in the Attorney General’s office. The current rule requires the District Attorney and Sheriff of each county to sign and consent before a company police agency may operate. That requirement grants a certification veto to local elected officials who hold no role in the Chapter 74E certification process. The agency exceeded its delegated authority when it created that requirement; the amendment corrects the exceedance by replacing consent with notice. The agency is not expanding its authority — it is restoring the authority structure the legislature assigned.

.0304(4)(5)(7) — Rulemaking Within Cited Statutory Authority: The existing rule cites G.S. 74E-6 as its authority. G.S. 74E-6(h) and (i) — the statutory basis for every new exception added by this amendment — are subsections of that same cited statute. The agency is acting within authority it already holds and has already cited. No new delegation is required or claimed.

CRITERION 2 — CLEAR AND UNAMBIGUOUS § 150B-21.9(a)(2) · § 150B-19(5)

A proposed rule satisfies Criterion 2 when it is clear and unambiguous. Both amendments use enumerated exception structures with specific statutory cross-references at every operative point.

.0203(a)(8): The change from “signed statement from or letters signed by” to “written notice provided to” is a precise, unambiguous textual substitution. The legal distinction between consent and notice is well-established. No interpretive question is created.

.0304(4)(5)(7): The restructured subsections enumerate each permitted condition in lettered items (a) through (f) with a specific statutory cross-reference in each. Every new exception cross-references either G.S. 74E-6(h), G.S. 74E-6(i), or both. The qualifying standard — “necessary and reasonable under the circumstances, consistent with G.S. 20-125(b)” — is not an administrative invention. It is the operative language of G.S. 20-125(b) itself, a statute that has governed emergency vehicle equipment use in North Carolina for decades. Subsection (7) is conformed by cross-reference to the full amended exception set of items (4) and (5), ensuring internal consistency across all three emergency vehicle operation prohibitions.

CRITERION 3 — REASONABLY NECESSARY TO IMPLEMENT A GENERAL ASSEMBLY ENACTMENT § 150B-21.9(a)(3) · G.S. 74E-6(i) · G.S. 20-125(b) · G.S. 74E-8

A proposed rule satisfies Criterion 3 when it is reasonably necessary to implement or interpret an enactment of the General Assembly. The Commission shall consider the cumulative effect of all rules adopted by the agency related to the specific purpose for which the rule is proposed. This is the Commission’s most substantive standard, and it is where both amendments are strongest.

3A. .0203(a)(8): Necessary to implement G.S. 74E-4 as enacted.

G.S. 74E-4 creates a statewide certification process administered by the AG. The current rule adds a local consent requirement that G.S. 74E-4 does not authorize and that is inconsistent with a statewide certification structure. A rule that imposes conditions conflicting with its authorizing statute is not necessary to implement that statute — it contradicts it. The amendment is necessary to restore the rule to conformity with the statute it implements.

3B. .0304: Necessary to implement G.S. 74E-6(i) — the direct statutory conflict.

G.S. 74E-6(i) is unambiguous: a company police officer providing assistance at a sheriff’s or chief’s request “shall have the same powers vested in law enforcement officers of the agency asking for temporary assistance.” A municipal officer answering the same call carries full authority to activate warning equipment already on the vehicle under G.S. 20-125(b). The rule denies that same authority to a company police officer operating under the same statutory authorization. A rule that prohibits conduct a statute expressly permits is not reasonably necessary to implement that statute. It is inconsistent with it. The amendment is necessary to resolve that inconsistency.

3C. .0304: Necessary to conform to G.S. 20-125(b)’s functional standard.

G.S. 20-125(b) authorizes emergency warning equipment for law enforcement vehicles when the officer is “actively engaged in performing law enforcement duties.” That is a functional test — it contains no property line, no commission boundary, and no employer-contract requirement. The rule substitutes a jurisdictional test that G.S. 20-125(b) does not contain. The Commission need only read the statute’s own text to confirm that the rule’s restriction has no basis in it.

“vehicles used for firefighting, or other emergency response purposes, or by the Division of Emergency Management, or by a fire department, either municipal or rural, or by a fire patrol, whether such fire department or patrol be a paid organization or a voluntary association, vehicles used by an organ procurement organization or agency for the recovery and transportation of human tissues and organs for transplantation, and every ambulance or emergency medical service emergency support vehicle used for answering emergency calls.”
— G.S. 20-125(b)

The General Assembly authorized every entity in that list under the same provision. Not one holds law enforcement jurisdiction. A volunteer fire patrol has no commission. An organ procurement vehicle has no arrest authority. Yet each may activate emergency warning equipment on every road in North Carolina without restriction, because G.S. 20-125(b) asks only what the operator is doing — not where the employer’s property is located. The rule’s property-boundary test is not a refinement of G.S. 20-125(b). It is a contradiction of it.

3D. Cumulative effect: the rule’s restriction has no rational relationship to any statute in the framework.

Under § 150B-21.9(a)(3), the Commission considers the cumulative effect of all agency rules related to the specific purpose for which the rule is proposed. G.S. 74E-8 requires company police to satisfy the same certification standards as all state law enforcement officers — including the mandatory 48-hour BLET Emergency Vehicle Operations Course (EVOC). The non-sworn operators G.S. 20-125(b) authorizes without restriction face substantially lower requirements:

Operator	EVOC Requirement	Hours	Equipment Use — Current Rule
Company Police (BLET/G.S. 74E-8) Same standard as ALL sworn LE	48-hr BLET EVOC — mandatory for certification	48 hrs	X MOST RESTRICTED — prohibited from activating on-vehicle equipment off-property absent exception
Municipal / County Law Enforcement (Same 48-hr BLET standard)	48-hr BLET EVOC — mandatory for certification	48 hrs	✓ No off-property restriction anywhere in NC Admin. Code
Volunteer Fire Depts. / Fire Patrols (No LE commission)	OSFM FIP 3600 — no BLET-equivalent mandate	24–29 hrs (typical)	✓ Unrestricted statewide under G.S. 20-125(b)
EMS / Ambulance / Emergency Support (No LE commission)	Agency SOPs, insurance policy — no BLET-equiv. mandate	16–80 hrs (varies)	✓ Unrestricted statewide under G.S. 20-125(b)
Organ Procurement / Div. of Emergency Mgmt. (No LE commission)	No statewide mandate reported	Not mandated	✓ Unrestricted statewide under G.S. 20-125(b)

The rule’s cumulative effect is precisely backwards. The operator category with the highest mandatory training requirement — sworn company police officers at 48 hours BLET EVOC — faces the greatest equipment restriction. Non-sworn operators with training requirements as low as 16 hours, or with no statewide mandate at all, face none. A rule whose restriction is inversely correlated with the training the agency’s own statute requires cannot be said to be reasonably necessary to implement that statutory framework. The amendment corrects the inversion.

The prohibition in .0304 desired intent was to prevent **unauthorized enforcement activity** under the guise of emergency vehicle operation. That purpose is preserved — officers remain prohibited from any use not necessary and reasonable under the circumstances, and the amendment permits no independent unsanctioned operations. But when the General Assembly enacted G.S. 74E-6(h) and (i) — expressly authorizing mutual aid and as-needed assistance with the full powers of the requesting agency — the rule was never updated. It has remained frozen in a statutory landscape that no longer exists, applied to scenarios the legislature already resolved in the officer’s favor. In those scenarios it has not protected anyone. It has placed the appearance of a jurisdictional boundary above the safety of the officers it governs and the communities they serve. Under § 150B-21.3A, a rule that no

longer serves the purpose for which it was adopted in light of changed law is precisely the kind of rule that amendment is designed to correct. The necessity standard is not met for the prohibited applications these amendments address.

CRITERION 4 — ADOPTED IN ACCORDANCE WITH PART 2 OF ARTICLE 2A § 150B-21.9(a)(4) · § 150B-19.1(c) · § 150B-21.2

No fiscal note is required: these amendments impose no new costs on any person or entity — all company police officer vehicles are already equipped with the emergency warning equipment at issue, and no additional personnel, procurement, or expenditure is required by either rule change.

III. AUTHORITY AND CONCLUSION

Rulemaking authority: Both amendments are issued under existing authority already cited in the rules being amended. 12 NCAC 02I .0203 cites G.S. 74E-4, which vests certification authority in the AG and forecloses the local-consent requirement. 12 NCAC 02I .0304 cites G.S. 74E-6, which includes subsections (h) and (i), the statutory basis for every new exception. No new statutory authority is required or claimed.

All four § 150B-21.9(a) criteria are satisfied: Both amendments are within the agency's delegated authority — and each corrects a rule that currently operates outside it. Both are clear and unambiguous, using enumerated structures with specific statutory cross-references and an established legal standard. Both are reasonably necessary to implement General Assembly enactments: .0203 to conform to G.S. 74E-4, and .0304 to resolve a direct conflict with G.S. 74E-6(i) and G.S. 20-125(b). Both will be adopted in accordance with Part 2. The Commission's review is confined to these four standards, and on each, the amendments are supported by the statutes the rules already cite.

- **.0203(a)(8):** Consent → notice. Restores AG as sole certifying authority per G.S. 74E-4. § 150B-21.9(a)(1)(3).
- **.0304(4) and (5):** Enumerated exceptions for emergency response to own jurisdiction, mutual aid (G.S. 74E-6(h)), and as-needed assistance (G.S. 74E-6(i)). Anchored to G.S. 20-125(b) reasonableness standard. § 150B-21.9(a)(1)(2)(3).
- **.0304(7):** Conformed to full exception set of amended items (4) and (5). Internal consistency across all three emergency vehicle operation prohibitions. § 150B-21.9(a)(2)(3).
- **Jurisdiction:** Unchanged. G.S. 74E-6(g) and the prohibition on independent investigation outside territorial jurisdiction remain in full force. No officer gains any authority to be anywhere not already authorized.
- **Fiscal impact:** None. Equipment is already on every vehicle. No new procurement, personnel, or expenditure required. No fiscal note required under § 150B-21.4.



**JEFF JACKSON
ATTORNEY GENERAL**

**PO DRAWER 310
RALEIGH, NC 27602
PHONE: (919) 661-5980**

**RANDY MUNN
COMPANY AND CAMPUS POLICE
ADMINISTRATOR**

**NORTH CAROLINA DEPARTMENT OF JUSTICE
COMPANY AND CAMPUS POLICE PROGRAM**

August 17, 2026

Periodic Review – 12 NCAC 02I and 02J

Response to Public Comment

The Campus and Company Police Program has reviewed and considered the public comment regarding rules 12 NCAC 02I .0203 Application for Company Police Agency and 12 NCAC 02I .0304 Prohibited Acts.

The purpose of the Public Comment Period which took place from March 13, 2026 to May 19, 2026 is specifically for the Initial Agency Determinations. During this process, the Agency—in this case, the Campus and Company Police Program—is responsible for determining whether each rule is Necessary or Unnecessary, pursuant to the following definitions found in N.C.G.S. 150B-21.3A:

Necessary rule – Means any rule other than an unnecessary rule.

Unnecessary rule – Means a rule that the agency determines to be obsolete, redundant, or otherwise not needed.

The Campus and Company Police Program initially determined that the currently published rules in Subchapters 02I and 02J of Title 12 of the North Carolina Administrative Code, including 12 NCAC 02I .0203 and .0304, are Necessary.

Upon review of the recommendations, it has been determined that the proposed amendments to Item (a)(8) of 12 NCAC 02I .0203 and to Items (4), (5), and (7) of 12 NCAC 02I .0304 do not deem the rules to be obsolete, redundant, or otherwise not needed. Therefore, the Campus and Company Police Program upholds the Initial Agency Determinations that 12 NCAC 02I .0203 Application for Company Police Agency and 12 NCAC 02I .0304 Prohibited Acts are Necessary.

PETITIONS FOR LEGISLATIVE REVIEW

Request for Legislative Review

Date: 9/8/2026

Full Name (Print): Owen Longston

County of Residence: Mecklenburg

Phone or Email: longston.owen@pydaho.com

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

Re: **12 NCAC 02I .0203(a)(8)** — Application for Company Police Agency

I object to the current rule on the following grounds:

- **Exceeds statutory authority.** G.S. 74E-4 vests company police certification authority exclusively in the Attorney General. Requiring the signed consent of the District Attorney and Sheriff grants an unauthorized certification veto to local elected officials who hold no role under Chapter 74E.
- **Denies equal protection.** Company police agencies are subject to a consent requirement not imposed on any comparable law enforcement agency whose certification is administered by the State.

Re: **12 NCAC 02I .0304(4)(5)(7)** — Prohibited Acts

I object to the current rule on the following grounds:

- **Unnecessary — G.S. 74E-6(h) and (i).** The General Assembly has expressly authorized company police to enter mutual aid agreements and to provide as-needed assistance at the direct request of a sheriff or police chief, with the same powers as the requesting agency's officers. A rule that prohibits the use of emergency equipment already installed on the vehicle during lawfully authorized deployments is unnecessary and has no basis in current law.
- **Conflicts with and is unreasonable under G.S. 20-125(b).** G.S. 20-125(b) affords the right to operate emergency warning equipment for the protection of life, safety, and the execution of official duties without jurisdictional bounds. That statute makes no distinction

based on property lines or employer commission boundaries. The current rule directly conflicts with G.S. 20-125(b) by imposing a jurisdictional restriction the statute does not authorize and the General Assembly did not intend. Under the rule as written, a vehicle transporting a human organ for transplant may activate emergency equipment freely on every road in North Carolina without restriction, while a sworn, BLET-certified law enforcement officer is prohibited from activating equipment already on their vehicle when a fellow officer needs timely backup during the execution of official duties. This rule places organ transport above the safety and welfare of a sworn law enforcement officer receiving timely assistance in the line of duty. That result conflicts with G.S. 20-125(b), is unreasonable on its face, and must be corrected.

- **Retards the execution of official duties and places officers at unnecessary risk.** By prohibiting the use of equipment already on the vehicle, the rule requires sworn officers to respond to active emergencies and officer assistance calls as civilian vehicles, delays their response, impedes their ability to execute official duties, and places them and the residents they serve at avoidable risk.

Members of the Commission:

I request that the above rules be reviewed in the upcoming legislative session as set out in N.C.G.S. § 150B-21.3. I further request that these rules be subject to a **delayed** effective date as provided in that provision.

Thank you for your consideration.

Signature: _____

A handwritten signature in black ink, consisting of a stylized 'J' or 'L' shape followed by a long horizontal stroke and a diagonal flourish.

Request for Legislative Review

Date: 9/8/2026

Full Name (Print): Randy Hill

County of Residence: Mecklenburg

Phone or Email: randum178@gmail.com

A Resident of the State of North Carolina.

N.C. Rules Review Commission

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Thank you for your consideration.

Signature:

A handwritten signature in black ink, appearing to be "K. J. [unclear]", written over a horizontal line.

Request for Legislative Review

Date: 9/8/2026

Full Name (Print):

Jahorace Sweat

County of Residence:

Mecklenburg

Phone or Email:

434-429-8166

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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Thank you for your consideration.

Signature: _____

Barbara Sweat

Request for Legislative Review

Date: 9/8/2026

Full Name (Print): Elizabeth Henderson

County of Residence: Mecklenburg

Phone or Email: _____

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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Thank you for your consideration.

Signature: _____



Request for Legislative Review

Date: 9/8/2026

Full Name (Print): Bala Apoorva Manadapu

County of Residence: Mecklenburg

Phone or Email: balamaradapu@gmail.com

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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Thank you for your consideration.

Signature: _____



Request for Legislative Review

Date: 09/ / 2026

Full Name (Print): Brian Alexander

County of Residence: Mecklenburg

Phone or Email: BKA2915@yahoo.com

A Resident of the State of North Carolina.

N.C. Rules Review Commission

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Re: 12 NCAC 02I.0304(4)(5)(7) — Prohibited Acts

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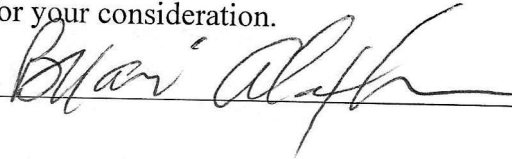
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Members of the Commission:

I request that the above rules be reviewed in the upcoming legislative session as set out in N.C.G.S. § 150B-21.3. I further request that these rules be subject to a **delayed** effective date as provided in that provision.

Thank you for your consideration.

Signature: _____



Request for Legislative Review

Date: 09/ / 2026

Full Name (Print): Terrence Sims

County of Residence: Sumter, SC

Phone or Email: terrence.sims30@gmail.com

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

Re: 12 NCAC 02I.0203(a)(8) — Application for Company Police Agency

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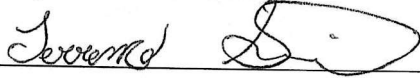
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Thank you for your consideration.

Signature: _____



Request for Legislative Review

Date: 09/ / 2026

Full Name (Print): Boyd P. Harris Sr

County of Residence: Mecklenburg

Phone or Email: 704 340-7395

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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Thank you for your consideration.

Signature: _____

Boyd P. Harris

Request for Legislative Review

Date: 09/01/2026

Full Name (Print): Ensimine Thomas

County of Residence: Meck

Phone or Email: 704-465-3342

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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Signature: _____

A handwritten signature in black ink, appearing to be "J. M. A.", written over a horizontal line.

Request for Legislative Review

Date: 09/ 8 / 2026

Full Name (Print): Danella Wise

County of Residence: Mecklenburg

Phone or Email: _____

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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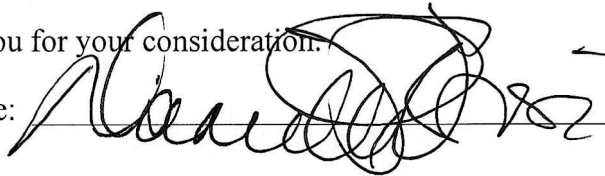
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Thank you for your consideration.

Signature: _____

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Request for Legislative Review

Date: 09/ / 2026

Full Name (Print): Jennifer C. Pena de Mena

County of Residence: Meck.

Phone or Email: Jenniferpena1114@gmail.com

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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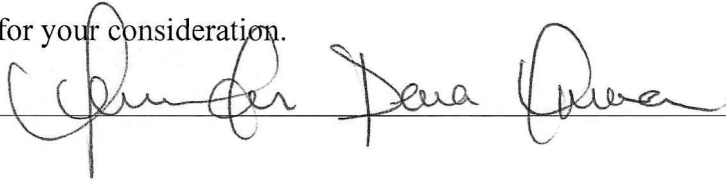
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Signature: _____

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Request for Legislative Review

Date: 09/ / 2026

Full Name (Print): Anna J Indharasophang

County of Residence: Mecklenburg

Phone or Email: Anna510271967@gmail

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

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Signature: _____

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Request for Legislative Review

Date: 09/08 / 2026

Full Name (Print): David Stephens

County of Residence: Gaston

Phone or Email: _____

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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Thank you for your consideration.

Signature: _____



Request for Legislative Review

Date: 9/3/2026

Full Name (Print): Natasha Williams

County of Residence: Mecklenburg

Phone or Email: natasha.ilenus@southeasternus.org

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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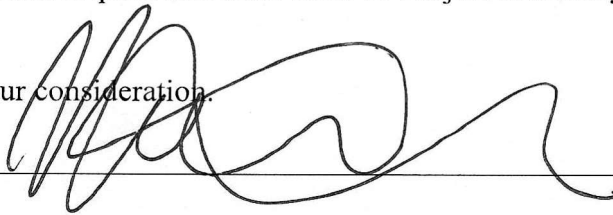
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Thank you for your consideration.

Signature: _____

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Request for Legislative Review

Date: 9/3/2026

Full Name (Print): Keith G. Williams

County of Residence: Mecklenburg

Phone or Email: kwilliams@southeasternus.org

A Resident of the State of North Carolina.

N.C. Rules Review Commission

6714 Mail Service Center

Raleigh, NC 27699-6700

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this message in error, please notify the sender immediately, permanently delete all copies, and do not read, copy, disclose, or distribute its contents. Unauthorized use or disclosure is strictly prohibited.

On Mon, Sep 14, 2026 at 9:58 AM rrc.comments <rrc.comments@oah.nc.gov> wrote:

Good morning, Mr. Williams,

I'm unable to open your attached document. The rules you have referenced have not been submitted to us for review at the September meeting. I also don't see where these rules have been published in the N.C. Register over the last few months.

Please resend your document and clarify.

Thanks,

Travis C. Wiggs

Rules Review Commission Counsel

Office of Administrative Hearings

Telephone: [984-236-1929](tel:984-236-1929)

Email: travis.wiggs@oah.nc.gov

From: Keith Williams | Executive Director | Chief of Police | SPSG | SCP <kwilliams@southeasternus.org>

Sent: Wednesday, September 9, 2026 9:55 PM

To: rrc.comments <rrc.comments@oah.nc.gov>; Ascher, Seth M <seth.ascher@oah.nc.gov>

Subject: [External] Rules Review Commission Committee meeting Sept 29 2026

You don't often get email from kwilliams@southeasternus.org. [Learn why this is important](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Dear Rules Review Commission,

Please accept the attached document as a formal rebuttal to NCDOJ 12 NCAC 02I.0304 and 0203(a)(8) for the upcoming meeting on September 29, 2026.

Thank you for your time and consideration.

Regards,

Keith Williams
Executive Director| Southeastern Public Safety Group, Inc.
Chief of Police| Southeastern Company Police
[704-394-1500 ext. 2](tel:704-394-1500)

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