

Complaint #: 18 UNL 058 (RSG)

Screening Date(s): 9/4/2018 Type: Screening Atty Screener: Norberg

Screening panel members (if applicable): Click to enter text

Screening Date(s): Enter/select date Type: Choose one Atty Screener: Click to enter text

Screening panel members (if applicable): Click to enter text

Closed w/o Investigation on: 9/4/2018 Reason for closure: SD

or

Opened for Investigation on: Enter/select date Reason for bypass (if applicable): Choose one

Priority: Choose one Direct to Paralegal? ☐ Y ☐ N

Team: Choose one Case Advisor: Click to enter text

Category:

- | | | |
|---------------------------------------------------|---------------------------------------------------|--------------------------------------------------------------|
| <input type="checkbox"/> Advertising | <input type="checkbox"/> Fraud/Deceptive Practice | <input type="checkbox"/> Substance Abuse/Impairment |
| <input type="checkbox"/> Caregiver | <input type="checkbox"/> Inappropriate Contact | <input type="checkbox"/> Unlicensed Activity |
| <input type="checkbox"/> Discrimination | <input type="checkbox"/> Miscellaneous | <input type="checkbox"/> Unprofessional Conduct |
| <input type="checkbox"/> Diversion of Contr. Sub. | <input type="checkbox"/> Negligence/Incompetence | <input type="checkbox"/> Unsafe Prescribing of Contr. Subst. |
| <input type="checkbox"/> Earnest Money/Trust Acct | <input type="checkbox"/> Prescriptive Practice | <input type="checkbox"/> Violation of Related Law |

Citation(s): Click to enter text

Notes: Click to enter text

Case Summary

Case Number	Status	Track	Priority	Team
18 UNL 058 (RSG)	Closed			

Screening Code	Screening Description	Bypass Code	Bypass Description
SD	Screening Decision. The screening panel (or screener) determined that the file does not warrant investigation. Do not open for investigation.		

Complainant(s)	Source	Attorney(s)
Hull, Mark	POLICE	

Respondent(s)	Credential Number	Attorney(s)	XRef Cases ?
Daehling, Charles E		Johns, Jason	No

Case Associate(s)	Role

Companion Case(s)	Status
18 UNL 059	Closed

Referred To	Referral Type	Comment
Police Dept	Referred From	

Legacy Case Violation	Citation	Alleged	Prosecuted	Final Hearing	Violation Type	Auth	Comment

Case Event	Description
07/11/2018	DOE Received Complaint on
07/23/2018	Sent to Attorney Screener on
07/23/2018	Case Number Assigned on
07/23/2018	CaseStatus Email Sent to Complainant.
07/31/2018	Received from Attorney Screener on
08/03/2018	Scrng Records & Resp Req
08/28/2018	Sent to Attorney Screener on
09/04/2018	Case closed w/o Investigation on
09/04/2018	Closed w/o Investigation on
09/04/2018	Received from Attorney Screener on

Case Note(s)	Text
Intake Description 07/23/2018	The Respondent was reportedly working as a security guard at a bank when he shot and killed a perpetrator of an attempted robbery. The Respondent was allegedly working in an armed capacity without a security guard license, without a firearms permit, in plain clothing and without being employed by a licensed security firm.
General Note 08/14/2018	Return mail for R with new address. 10-day resent.



Clients Credentialing Enforcement Boards A/R Maintenance

[Home](#) » [Credentialing](#) » [Application](#) » [Individual Application](#) » [Applicant](#) » [Add Applicant](#) » [Method](#) » [List](#) » [Application](#)
Application
 Use the tabs to enter the applicant's information.
 Not all application checklist items have been met.

[Checklist](#) | [Applicant](#) | [School](#) | [Residency](#) | [Insurance](#) | [Xref](#) | [Firearms](#) | [Notes](#) | [History](#) | [Letters](#)

Applicant: [Charles Daehling](#)
Profession: 108 (Private Security Person)
Method: [OLAS](#)
Method From:
Credential Initial:

Application ID: 561860
Received: 2/9/2016
[Add Transaction](#)
Entered: 2/9/2016
Dept Received:
Status: [In process](#)
License #:

[Completed Questionnaire](#) | [Uploaded Documents](#)

 All Tabs Completed: ☐
[Print Folder Label](#) | [Print Mailing Label](#) | [Print Checklist](#) | [Email Applicant](#) | | | |
Enter Checklist

Requirement	Status	Met Date	Comments	Exam
Review needed on OLAS Questionnaire	Met	07/06/2018		
License Application Complete	Not Met			
License Fee	Met	07/12/2018	7/12/18 complete jb	
Authorization for release of FBI information (#2687)	Met	07/18/2018	7/18/18 complete -jb--- 7/5/18 Form 2687 is required.	
Information on Conviction(s)/Pending Charge(s) (Form #2252)	Not Met		7/18/18 Your file has been sent for legal review. Files are	
CIB Fingerprint	Met	07/06/2018		
FBI Fingerprint	Met	07/06/2018		
Affiliation - Entity Working For	Met	07/18/2018	7/18/18 complete -jb--- 7/5/18 Employment with a WI	
Addendum to online application	Met	07/18/2018		
Request for Temporary License	Not Applic			

Sankbeil, Kelley - DSPS

From: DSPS Monitoring
Sent: Wednesday, July 11, 2018 9:58 AM
To: DSPS Enforcement
Subject: FW: Unlicensed Security Firm

Nilajah Hardin

Department Monitor / Regulatory Specialist
Wisconsin Department of Safety and Professional Services
Division of Legal Services and Compliance
PO Box 7190 / 1400 E Washington Ave / Madison, WI 53707-7190
P: (608) 267-7139 / F: (608) 266-2264 / E: Nilajah.Hardin@wisconsin.gov

The DSPS is committed to service excellence. Visit our survey at https://www.surveymonkey.com/r/MonitoringPAP_DLSC to evaluate your experience with the DSPS

We're moving! Beginning July 16, 2018 you will find us at our new office space located at 4822 Madison Yards Way, Madison, WI 53705. Please note all walk-in counters in our Madison office will be shut down at 12 PM CST on Friday, July 13th and will resume operation at the Madison Yards Way location at 7:45 AM CST on Monday, July 16th.

From: Hull, Mark <MHull@cityofmadison.com>
Sent: Tuesday, July 10, 2018 2:36 PM
To: DSPS Monitoring <DSPSMonitoring@wisconsin.gov>
Cc: Hull, Mark <MHull@cityofmadison.com>
Subject: Unlicensed Security Firm

To Whom It May Concern,

On 03/01/18, the City of Madison Police Department responded to an attempted robbery of the Chase Bank at 4513 Milwaukee St. During this attempted robbery, the suspect was shot by a plain clothes security guarded hired by Chase Bank through a company in Nebraska. The suspect was later tied to several other bank robberies in the Cities of Madison and Middleton, including one previous robbery at the same Chase Bank in December 2017. An investigation was conducted, and the City of Madison Police Department and the Dane County District Attorney's Office concluded that the security guard was justified in using deadly force against the suspect.

Separate from the potential homicide investigation, the security guard provided information that he was contracted through a security company in Nebraska. We spoke with the owner of this security company, who advised that the security guard was not an employee of the security company but an independent contractor, who was completely responsible for providing himself with equipment, firearms, and any training. It appears this security company may have 2 to 3 contractors operating in Madison and Milwaukee. The City of Madison Police Department has decided not to refer charges to the Dane County District Attorney's Office reference licensing requirements for the security firm and the security guard.

I am sending this information to your agency to provide you with the company's information and security guard's information in case your agency wishes to take any action against them for lack of proper licensing for the services they were providing. The security guard is no longer employed by the security company. Please feel free to contact me if you have any questions concerning this case. If you wish to request a copy of the police reports please contact the City of Madison Police records department at 608-266-4075. Thank you for your time and again if you have any other questions please feel free to contact me.

Company

Bobbi Randall Inc.
Jess Randall (co-owner)
2875 W. Highway 91
Blair, NE 68008
P 402-427-4122
F 402-426-8801

This company may also contract through Strategos International 12911 US Highway 71, Grandview, MO 64030

Security Guard

Charles E. Daehling

[REDACTED]
Madison, WI 53718
[REDACTED]

Detective Mark Hull, #4006

City of Madison Police Department, East District
809 S. Thompson Drive
Madison, WI 53716
Desk 608-267-1138
Cell 608-640-9628
Fax 608-224-7150
MHull@cityofmadison.com

Sankbeil, Kelley - DSPS

From: Varriale, Laura M - DSPS
Sent: Wednesday, July 11, 2018 12:12 PM
To: DSPS Enforcement
Subject: RE: Unlicensed Security Firm

Regular processing! Thanks.

From: DSPS Enforcement
Sent: Wednesday, July 11, 2018 10:43 AM
To: Varriale, Laura M - DSPS <LauraM.Varriale@wisconsin.gov>
Cc: Ayres, Ashley - DSPS <Ashley.Ayres@wisconsin.gov>
Subject: FW: Unlicensed Security Firm

Process as a priority, or in date order?

Thanks,

Kelley Sankbeil

Division of Legal Services & Compliance | WI DSPS
P.O. Box 7190 | Madison, WI 53707-7190
Telephone: (608) 261-4490 | Fax: (608) 266-2264

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From: DSPS Monitoring
Sent: Wednesday, July 11, 2018 9:58 AM
To: DSPS Enforcement <DSPEenforcement@wisconsin.gov>
Subject: FW: Unlicensed Security Firm

Nilajah Hardin

Department Monitor / Regulatory Specialist
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Security Guard

[REDACTED]

Detective Mark Hull, #4006

City of Madison Police Department, East District

809 S. Thompson Drive

Madison, WI 53716

Desk 608-267-1138

Cell 608-640-9628

Fax 608-224-7150

MHull@cityofmadison.com



His head and face covered with a black cap and black mask, Luis Marty Narvaez rushes into the Chase Bank at 4513 Milwaukee St. in this image taken from one of the bank's security cameras. Narvaez was shot seconds later.

MADISON POLICE

When convicted bank robber Luis Marty Narvaez walked into the Far East Side Madison branch of Chase Bank on the afternoon of March 1, 24-year-old Charles Daehling was just weeks into his position as an armed, undercover security guard working without a state license and under contract to an unlicensed and now-defunct Nebraska security firm.

Narvaez's head and face were covered with a black cap and black mask as he briskly stepped to a window where a teller was already helping a customer, stuck a bag under the window and demanded money but never displayed a weapon, according to a 124-page Madison police report and video surveillance footage of the incident.

Daehling was already standing up from a chair in the bank's small lobby and pulling a gun from his waistband when Narvaez reached the teller. He then took about four steps toward Narvaez and, without saying a word, shot him once in the back from about 6 feet away.

Narvaez collapsed and soon died at the scene. The whole episode — from the moment Narvaez entered the bank to the moment he was shot — lasted about seven seconds, according to surveillance videos.

Both the videos released last week and the police report were altered to remove information that would identify witnesses or the security guard. But several references to Daehling in the police report were not blacked out, and the State Journal was able to confirm his identity through social media, public records and its own reporting.

In May, Dane County District Attorney Ismael Ozanne announced his office would not pursue charges against Daehling.

A female customer who was at the teller window Narvaez approached told police Narvaez was wearing dark clothing and something over his face, and twice told the teller something similar to “put the money in the bag.”

“She then heard one shot and,” according to the woman, “he dropped.” Until

she saw blood, she said, she thought the whole thing might be a drill.

Daehling continued to point his gun at Narvaez for the four and a half minutes immediately following the shooting, according to the surveillance videos. Witnesses heard him tell Narvaez to remain still and keep his arms out, according to the report. One witness said that “made sense” because he thought the robber could be an active shooter.

In two formal interviews with police, Daehling said he shot Narvaez as the would-be robber stood before what Daehling said was the bulletproof glass of the teller’s window. He told police he didn’t know whether Narvaez was armed because he had his hands in the pockets of his hoodie.

Surveillance videos, however, show Narvaez before the shooting with his right hand out of his pocket and his left covered with what appears to have been the bag that he stuck under the teller’s window.

Daehling didn’t think giving Narvaez a verbal warning before opening fire “would have been appropriate” once he realized a robbery was taking place, because Narvaez and the female customer were close enough that he worried Narvaez could have taken her hostage, the police report says.

Daehling also told police he thought about trying to provide Narvaez with medical attention after the shooting but “given that he didn’t know whether the suspect was armed, the fact that he had his hands inside his hoodie pockets and the fact that he was the only one in the bank armed and with two customers, he believed that it would be better to make sure that he covered the male suspect with his firearm, until police arrived.”

Police said Daehling appeared to have been shaken by the incident and asked an officer for permission to smoke a cigarette to “calm his nerves,” according to the report. Later, before he was interviewed at the East District station, an officer made small talk with him “in an attempt to help him calm down as he appeared to be emotionally distressed by this incident.”

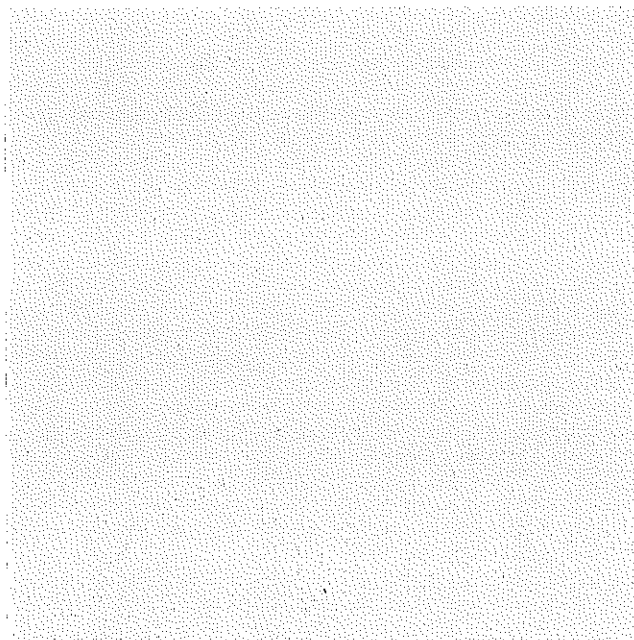
Attempts by the Wisconsin State Journal to reach Daehling, a former Marine, for an interview resulted in a June 30 email from Jason Johns, president of the Madison-based law firm NMLB Veterans Advocacy Group.

“This matter has been resolved and is no longer a ‘story,’” Johns said. “Charles has asked you to honor his wishes for no further inquiries to him, members of his family, friends, etc. He is still working through the trauma of the incident and taking the steps to move forward with his life as best as he can. Continued media inquiries only frustrates this, especially when he has nothing more to say about the matter.”

Narvaez, 35, had been released from federal prison six years before he tried to rob the bank, after doing almost 10 years for robbing Wisconsin Community Bank in Middleton in 2002. His death led police to close several older bank robbery cases in which he was a suspect.

No training, license

Daehling told police he hadn’t received any training from the Blair, Nebraska-based company he had been working for, Optimal Protection. The company’s owner, Jess L.



Luis Marty Narvaez in 2003.

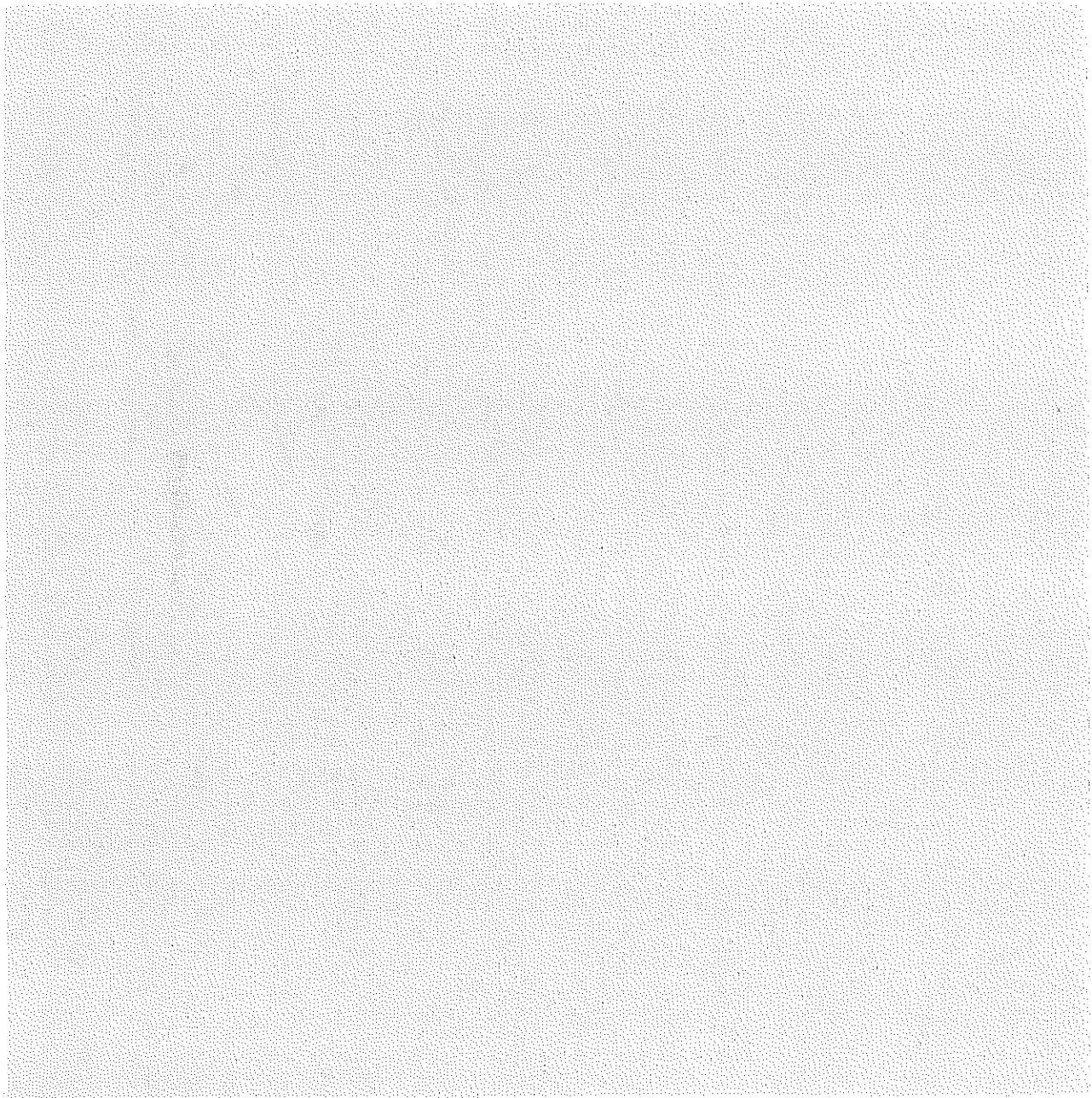
DANE COUNTY SHERIFF'S OFFICE

Randall, told police that any training for his employees “is the responsibility of the contractor,” and that he hired only former members of the military or former police as “independent contractors.”

The independent contractors are hired through a company called Bobbi Randall Inc., Randall said, and the contracts “organized” through a Grandview, Missouri, company called Strategos International, according to the police report.

Bobbi Randall Inc. is registered with the Nebraska Secretary of State’s office as a court reporting service, with its registered agent listed as Roberta M. Randall at the same address Jess L. Randall provided for his private security company.

A man who answered the phone listed on Optimal Security’s website declined to give his name and said the firm is no longer in business.



In this image from one of the Chase Bank's surveillance videos, security guard Charles Daehling draws a gun behind would-be robber Luis Marty Narvaez just prior to killing him with a single shot. Participants' faces have been obscured by police.

MADISON POLICE

When the State Journal told him it was seeking comment about the Narvaez shooting, the man said “no, that’s not going to happen,” and the line went dead.

Mark Warren, Strategos senior vice president and director of training, said his company no longer subcontracts with Bobbi Randall Inc. but that such subcontracting arrangements are common in the private security industry because no one particular security company can be licensed to work in every state.

The companies that hire the guards “are responsible then for their own subcontractors,” he said.

Under Wisconsin law, private security guards must be in uniform unless they hold state private detective licenses. Uniformed or not, they must also work for licensed security firms. Neither Daehling, Randall, Optimal Protection or Strategos show up in a search of licensed individuals or companies on the state Department of Safety and Professional Services’ website.

DSPS spokesman Matt Censky said the agency has no record or any active or completed investigation into Randall, Daehling, Optimal Protection or Strategos.

But on July 10, after inquiries from the State Journal, Madison Police East District Capt. Thomas Snyder said in an email: “Now that the DA’s Office has determined that criminal liability does not attach to the security guard for the

shooting, MPD will refer the licensing issues that have been raised to the appropriate State regulatory authority for their determination on what, if any, sanctions should be pursued for noncompliance.”

Chase Bank, which started using off-duty Madison police officers to provide security at the branch shortly after the Narvaez shooting, declined to say whether it has any minimal training requirements for security guards who work at its branches, or to answer any other questions about how Daehling came to work at the branch.

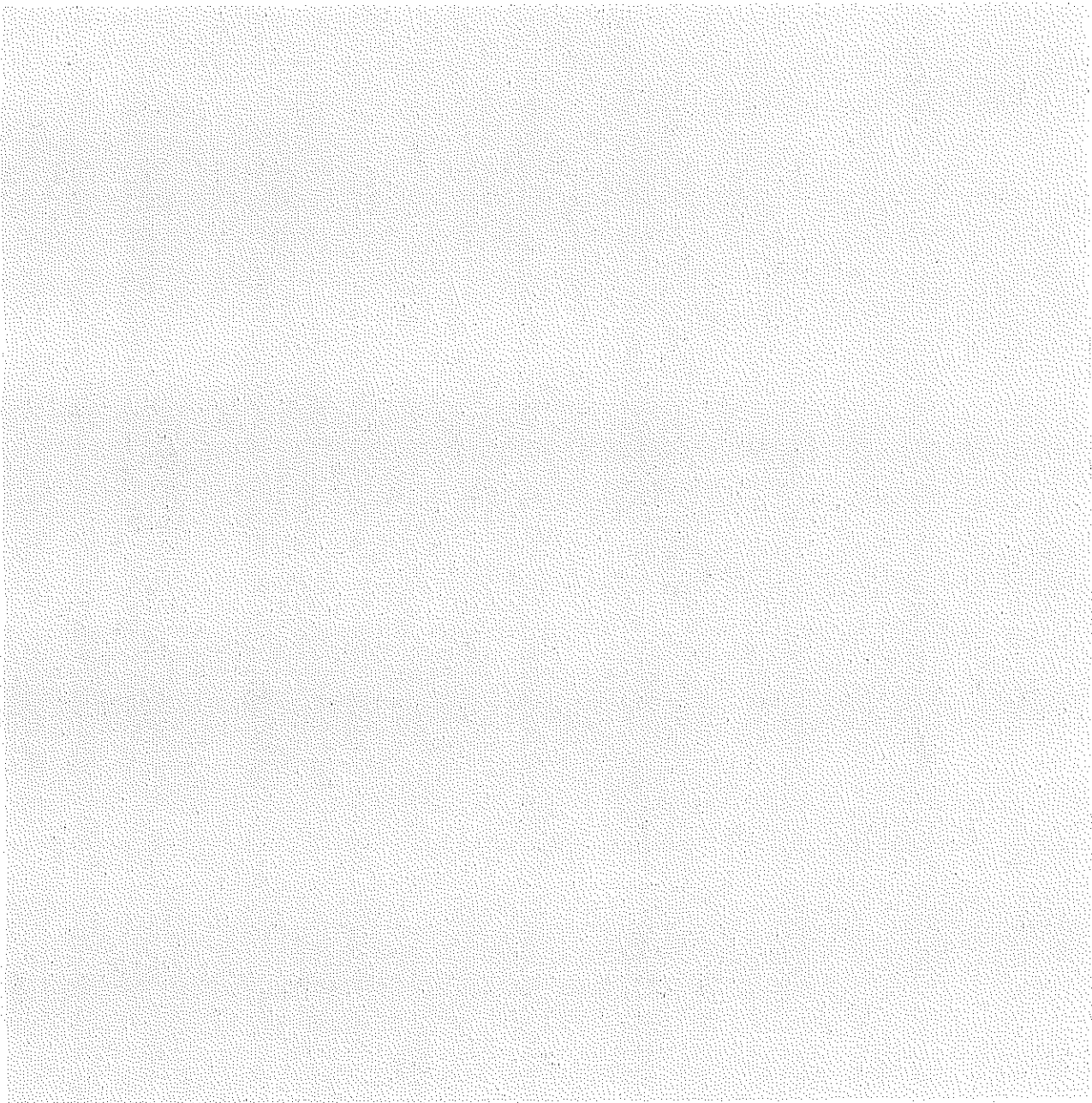
“Following our standard policy, we decline to discuss our relationships with vendors,” Chase spokesman Tom Kelly said in an email.

What is ‘reasonable’?

Madison Police Chief Mike Koval and the department’s force coordinator, Kimba Tieu, were reluctant to speculate on how Madison police officers would have reacted had one of them been providing security at the bank when Narvaez tried to rob it.

In use-of-force incidents, “what, at first glance, appears to be a set of straightforward facts hardly ever is,” Koval said.

Tieu emphasized that the legal standard for determining whether lethal force is justified is not based on what is known about an incident in hindsight, but on what’s reasonable to believe at the time the incident is occurring.



Madison police officers investigate after a security guard shot and killed a man attempting to rob a Chase Bank branch at 4513 Milwaukee St. on March 1.

BUY NOW

JOHN HART, STATE JOURNAL ARCHIVES

“It is possible” a Madison police officer could have made the same decision Daehling did, Tieu said, noting that there can be a danger in hesitating to use force if the suspect uses the delay to harm someone.

If you’re the teller, “would you want the person who has the means to intercede to act?” he said.

At the same time, Tieu said officers are trained to give a verbal warning “if feasible” before firing on someone and that a suspect facing an officer can present a more direct threat than one who has his back turned, as Navarz did. But affecting both will be whether the officer has enough room to take cover, he said.

Other factors police are trained to consider are how far the officer is from the suspect and whether there are other people in the area, he said.

Tieu said Madison police have trained in scenarios similar to the one Daehling faced, but Koval said it would be unfair to compare what a veteran police officer and a security guard would have done in the Chase Bank robbery.

“A Madison police officer is provided significantly more training in ascertaining whether the use of deadly force is appropriate,” he said.

“A security guard has nowhere close to the reps and scenario-based vignettes that an MPD officer will receive over the course of their basic academy curriculum and ongoing training that is conducted on a yearly basis.”

MORE INFORMATION



No charges against security guard who fatally shot bank robber

- Man attempting to rob Far East Side bank fatally shot by security guard, Madison police chief says
- Authorities identify man fatally shot by security guard during alleged Madison bank robbery

Chris Rickert | Wisconsin State Journal

Chris Rickert is the urban affairs reporter and SOS columnist for the Wisconsin State Journal.

Wisconsin Department of Safety and Professional Services
Division of Legal Services and Compliance
4822 Madison Yards Way
PO Box 7190
Madison WI 53707-7190
RETURN SERVICE REQUESTED



Phone: 608-266-2112
Web: <http://dsps.wi.gov>
Email: dsps@wisconsin.gov

Scott Walker, Governor
Laura Gutiérrez, Secretary

August 14, 2018

CHARLES DAEHLING



MADISON WI 53718 - 3286

Re: 18 UNL 058 (RSG)

Dear Mr. Daehling:

The purpose of this letter is to inform you that we recently received a complaint against you. The details of the complaint were reviewed and evaluated by a department attorney.

The screening attorney has requested additional information from you to determine whether the complaint should be opened for investigation. Please include a written response (verbal responses are not accepted) and copies of all relevant documents no later than **August 29, 2018**. **Be advised that our Department is going paperless; we encourage you to submit all materials electronically via email to Kelley.sankbeil@wi.gov or fax (608) 266-2264.** Under Wis. Stat. 440.03(4) the Department has the authority to issue subpoenas for the production of documents.

If you have any questions, I can be reached at (608) 261-4490, kelley.sankbeil@wi.gov, or fax at (608) 266-2264.

Your prompt cooperation is appreciated.

Sincerely,

Kelley Sankbeil
Division of Legal Services and Compliance

Enclosure

From: [Sankbeil, Kelley - DSPS](#)
To: ["Jason Johns"](#)
Cc: [Charles Daehling](#)
Subject: RE: Correspondence with Mr. Charles Daehling
Date: Monday, August 27, 2018 3:13:00 PM
Attachments: [Complaint Redacted.pdf](#)

Mr. Johns,

Please find attached a copy of the complaint our Department received. The screening attorney has requested a written response addressing the alleged unlicensed practice and the events of 3/1/18 as well as any documentation that supports your clients position in this matter.

Sincerely,

Kelley Sankbeil

Division of Legal Services & Compliance|WI DSPS
P.O. Box 7190|Madison, WI 53707-7190
Telephone: (608) 261-4490|Fax: (608) 266-2264

We have moved! The DSPS Madison office is now located at the Hill Farms State Office Building, 4822 Madison Yards Way, Madison, WI 53705.

The DSPS is committed to service excellence. Visit our survey at <https://www.surveymonkey.com/r/AdministrativeDLSC> to evaluate your experience with the DSPS.

From: Jason Johns <jason@nmlbvet.com>
Sent: Monday, August 27, 2018 12:19 PM
To: Sankbeil, Kelley - DSPS <Kelley.Sankbeil@wisconsin.gov>
Cc: Charles Daehling <[REDACTED]>
Subject: Re: Correspondence with Mr. Charles Daehling

My apologies. Letter referenced is attached to this email.

From: Jason Johns <jason@nmlbvet.com>
Date: Monday, August 27, 2018 at 12:18 PM
To: <Kelley.sankbeil@wi.gov>
Cc: Charles Daehling <[REDACTED]>
Subject: Correspondence with Mr. Charles Daehling

Ms. Sankbeil;

I am assisting Charles Daehling with issues surrounding his involvement on 03/11/2018 in the attempted armed robbery of the Chase Bank at 4513 Milwaukee Street in Madison. I

have ccd Mr. Daehling on this email but ask that you correspond with the two of us directly so I may best represent him.

Charles has sent me the attached letter that you mailed to him regarding a complaint having been filed against him. In the letter you inform Mr. Daehling that *"the screening attorney has requested additional information from you (him) to determine whether the complaint should be opened for investigation."* You also asked Mr. Daehling to provide a *"written response and copies of all relevant documents no later than August 29, 2018."*

Mr. Daehling intends to fully cooperate with your requests but before he may most satisfactorily do so if you would please send us, via reply all to this email, the following:

- 1) **What "additional information" did the screening attorney request?**
- 2) **A copy of the complaint filed against Mr. Daehling.**

As you can ascertain, it is difficult for us to send you an appropriate written response including all relevant documents without knowing the additional information the screening attorney requested as well as what the specific basis for the complaint are. As soon as we have received this information we can provide you with the written response.

Thank you,

Jason E. Johns

President- N.M.L.B. Veterans Advocacy Group

Purple Heart Recipient-IRAQ

www.nmlbveterans.com

(608) 665-3380

104 King St, Ste 301

Madison, WI 53703

From: Jason Johns
To: [Sankbeil, Kelley - DSPS](#)
Cc: [Charles Daehling](#)
Subject: Response to Complaint-DAEHLING
Date: Tuesday, August 28, 2018 9:52:42 AM
Attachments: [Daehling Response to Complaint.docx](#)
[Email from Jess Randall.pdf](#)

Ms. Sankbeil,

Please see attached for Mr. Charles Daehling's formal response to the complaint filed against him. It is our sincere hope that the DSPS screening attorney sees there is no basis to open a formal complaint for investigation.

We stand ready to answer any additional questions you may have.

Thank you,

Jason E. Johns

President- [N.M.L.B. Veterans Advocacy Group](#)

Purple Heart Recipient-IRAQ

www.nmlbvet.com

(608) 665-3380

104 King St, Ste 301

Madison, WI 53703

Charles Daehling Statement of Events from March 1, 2018

On March 1, 2018 I was working as a non-uniformed private security officer for Optimal Protection assigned to the Chase Bank location at 4513 Milwaukee Street, Madison, WI. I was sitting in a chair in the lobby when an individual came walking quickly in to the bank and went immediately to one of the tellers. His face was covered with a black mask and it was apparent to me that a robbery was in process. His hands were in his pocket and he had placed a bag under the teller window and demanded money.

I decided at that time to fire my weapon and eliminate the threat. The robber (Luis Narvaez) was standing next to a female customer and I feared if I notified him I was behind him we could be facing a hostage situation. And although I had not seen a firearm on display I truly believed that he had one so did not want to take any chances. I decided knowing what I knew at the time.

Mr. Narvaez died at the scene before authorities arrived. I fully cooperated with law enforcement that evening and over the following months and in May, the Dane County District Attorney's office and City of Madison Police Department concluded that I was justified in using deadly force against Mr. Narvaez and no charges were being pursued against me.

Response to Alleged Unlicensed Practice as a Private Security Officer

In June 2017 I was contacted via telephone by a friend, Ryan Wetley, who is a private security guard. He asked if I would be interested in working for Optimal Security as they were looking for more private security guards in Wisconsin who were prior military (I served in Afghanistan with the U.S. Marines and left the military in March 2014). I was soon thereafter hired by Optimal Security and completed a W-9 form with them to become an independent contractor with them. I asked about having to be licensed and was told by Mr. Jess Randell over the phone that "you are covered by us and do not need to worry about getting licensed." I believed Mr. Randell's statement to be true as I did not know much about the licensing process for private security guards in Wisconsin and my friend Ryan was working for them just fine. Given that Optimal Security was operating in the state I assumed all was fine and I agreed to begin working for them.

I worked numerous sites in the state on behalf of Optimal Security from June 2017 until the incident in March 2018. I believed that even though I was technically an independent contractor, that I was in fact "employed" by Optimal Security and was meeting all requirements to do my job due to the fact that I did not handle any billing or contacts with the clients, whose sites I worked at as a security guard. Optimal Security handled billing and contracting with the clients and then sent me emails with dates, times and addresses of where to report to, as well as the point of contact. I was compensated for my work via direct deposited ACH pay checks.

I have enclosed an email from Mr. Jess Randall, dated March 29, 2018, which I requested from him for City of Madison PD's investigation needs. In the email he states: *"He (me) worked about 10-15 jobs as an independent contractor up to contracting the JP Morgan Job which he started on January 29, 2018, Pinkerton Manager who requested assignment as the JP Morgan Bank is Matt Gookins 414-308-4245. He (me) never had any complaints on any contract. He (me) always was getting compliments on all contracts that he worked for Professionalism, Performance, and Competence.* I submit this email to show that I reasonably believed that an "employer/employee" relationship existed between myself and Mr. Randall from Optimal Security.

In addition, please see this link to a Wisconsin State Journal article from August 27, 2018: http://madison.com/news/local/crime/article_6ba6ad15-c343-58be-9df0-9a30185fbccb.html

This article contains information that will assist you in your review of the complaint against me, but I wish to point out specifically where it details speaking with Mark Warren, Strategos senior vice president (whom I do not know nor have I had any correspondence with) said his company no longer subcontracts with Bobbi Randall Inc. (Optimal Security)... "the companies that hire the guards (in my case Optimal) "are responsible then for their own subcontractors." I believed that Optimal Security was responsible for me as an employee/subcontractor.

In conclusion, I feel that due to the events of March 1, 2018 I have found myself in the midst of a possible tangled web of security companies who may or may not have followed proper licensure and bonding protocols in order to operate in the state of Wisconsin and are now pointing fingers and trying to avoid responsibility. I am simply a young Marine who left service a few years ago and have been working and scratching to make a living ever since. I was offered an opportunity in June 2017 to utilize the training I received in the Marine Corps to make a much-needed income. I was not "savvy" as to what independent contractor may or may not mean, what licensure and bonding requirements were involved, etc. I simply took a job which I performed well given my military experience, showed up and did it, and got paid. I do not mean to belittle the state-imposed requirements governing the private security industry but am merely saying I believed I was working for a legitimate security company and I had no reason to think otherwise. Yet, for some reason, it appears that Optimal Security and Strategos are playing the blame game and trying to avoid any liability for not conducting proper corporate due diligence. Please do not let them do so at my expense as a private individual who thought he was just working a good job and wishes to put this traumatic experience behind him and move forward with his life.

Thank you,

Charles Daehling

Subject: Fwd: charlie

Date: Monday, August 27, 2018 at 6:07:38 PM Central Daylight Time

From: Charles Daehling

To: jason@nmlbvet.com

Sent from my iPhone

Begin forwarded message:

From: Jess Randall <[REDACTED]>
Date: March 29, 2018 at 19:43:05 CDT
To: Charles Daehling <[REDACTED]>
Subject: charlie

Sir, Charles Started contracting for us in June 2017 he was recommended to us by Ryan Whetley another Independent contractor.
He worked about 10 - 15 jobs as a Independent contractor up to contracting the JP Morgan Job which he started on January 29 2018, Pinkerton Manager who requested assignment at the JP Morgan Bank is Matt Gookins 414-308-4245
He never had any complaints on any contract
He always was getting compliments on all contracts that he worked for Professionalism, Performance, and Competence.
Im will be going back through the contracts and see exactly which contracts he was on, hoping to have list to you tomorrow