



# **Minnesota Department of Commerce: Investigation of Auto Glass Insurance Processing by Safelite Solutions, LLC**

**Special Review  
April 17, 2018**

**OFFICE OF THE LEGISLATIVE AUDITOR**  
STATE OF MINNESOTA

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**OFFICE OF THE LEGISLATIVE AUDITOR**  
STATE OF MINNESOTA • James Nobles, Legislative Auditor

April 17, 2018

Members of the Legislative Audit Commission:

In 2014, the Minnesota Department of Commerce opened an investigation into insurance claims processing for auto glass repairs. The investigation focused on the role of Safelite Solutions, LLC, (Safelite), a company that processes claims for several auto insurance companies in Minnesota. Commerce opened the investigation in response to allegations that Safelite steered people making claims away from auto glass repair shops that were not part of Safelite's network of repair shops.

Representative Kelly Fenton asked the Office of the Legislative Auditor to examine whether a Commerce investigator complied with the Government Data Practices Act when he disclosed information about the ongoing Safelite investigation to a representative of the repair shops that brought the allegations against Safelite.

We concluded that the investigator did not comply with the relevant provision in the Data Practices Act, but we found no harm to individuals that resulted from his action. Rather, his action added to a perception that the Department of Commerce did not conduct its Safelite investigation objectively or in strict compliance with state law.

The Commerce investigator and other department officials cooperated fully with our review.

James Nobles  
Legislative Auditor

Elizabeth Stawicki  
Legal Counsel



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## INTRODUCTION

The Office of the Legislative Auditor (OLA) conducted this special review in response to a request from Representative Kelly Fenton. Representative Fenton asked OLA to examine certain actions the Minnesota Department of Commerce took while investigating Safelite Solutions, LLC (Safelite). The investigation was in response to allegations about Safelite's administration of auto glass insurance claims.

Commerce investigators began making inquiries about Safelite in Fall 2013 and began a formal investigation in April 2014. The investigation continued for approximately two years and resulted in legal proceedings in Federal Court, the Minnesota Court of Appeals, and the Minnesota Office of Administrative Hearings.<sup>1</sup> Some issues in the litigation are still pending.<sup>2</sup>

The Safelite legal proceedings involve a wide range of complex issues related to the authority and investigative methods of the Department of Commerce. However, we narrowly tailored our review to the concern raised by Representative Fenton.

In her letter to OLA, Representative Fenton specifically cited the fact that a U.S. district judge in the federal litigation criticized a Commerce investigator for disclosing "confidential information and status reports with competitors of Safelite during the investigation." Representative Fenton asked OLA to examine what information the investigator disclosed and determine whether the investigator complied with the Minnesota Government Data Practices Act.

We relied primarily on the extensive record created by the Safelite legal proceedings. We supplemented that record with our own under-oath interviews with key people involved in the Commerce investigation.

## CONCLUSION

**A Department of Commerce investigator did not comply with the applicable provisions of the Government Data Practices Act when he disclosed information about an ongoing investigation of auto glass insurance claims processing by Safelite Solutions, LLC.**

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<sup>1</sup> *Safelite Group, Inc. v. Rothman*, 229 F. Supp. 3d 859 (D. Minn. Jan. 23, 2017); *In the Matter of Safelite Solutions, LLC*, Order Dismissing Appeal as Premature, No. A17-1971 (Minn. App. 2018); and *In the Matter of Safelite Solutions, LLC*, 2017 MN OAH LEXIS 64.

<sup>2</sup> On August 11, 2017, the judge in the Safelite case, U.S. District Judge Susan Richard Nelson, ordered the Minnesota Department of Commerce to pay Safelite \$941,534.67 in attorneys' fees and costs—about half of what Safelite originally sought at \$1,966,872.27. The Department of Commerce has appealed Judge Nelson's attorneys' fees order to the United States Court of Appeals for the Eighth Circuit where a decision is pending. *Safelite Group, Inc. v. Rothman*, No. 17-2974 (8<sup>th</sup> Cir. filed Sept. 8, 2017).

## BACKGROUND

Given the complexity of the Commerce investigation of Safelite, we start by providing brief background information about the key participants and issues involved.

### Minnesota Department of Commerce

The Minnesota Department of Commerce has broad regulatory authority over a large number of businesses and individuals involved in various industries, including real estate, insurance, banking, telecommunications, and securities. Relevant to our review, the Department of Commerce enforces state automobile insurance laws.<sup>3</sup> Those laws include requirements on how insurance companies must handle claims involving auto glass repair and replacement.

### Safelite Solutions, LLC (Safelite)

Safelite is a national company based in Columbus, Ohio, which among other things, manages auto glass claims for several insurance companies as a third-party administrator.<sup>4</sup> In Minnesota, these insurers include: Auto Club Group, Inc. (AAA); USAA; and American Family.<sup>5</sup>

When a policyholder covered by one of these insurance companies calls in a claim, the insurer routes the call to a Safelite call center, which then handles the claim. As part of its auto glass claims processing business, Safelite maintains a network of preferred repair shops that have signed a Network Participation Agreement. Under the Agreement, these in-network shops agree to complete all repair and replacement work for the price established by each insurance company.

### Independent Glass Shops

Independent glass shops are not part of Safelite's network. Over the years, these shops and their attorney, Charles Lloyd, have complained to Commerce about three issues: (1) insurers have been refusing to pay fair and reasonable rates; (2) Safelite has been improperly acting as an adjuster in determining reimbursements; and (3) when Safelite processes claims, it and the insurers steer policyholders to use a Safelite-affiliated glass repair shop.<sup>6</sup> The independent shops have complained to Commerce since the early 2000s, but Commerce could find no evidence that Safelite made deceptive or misleading statements that would constitute steering.<sup>7</sup>

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<sup>3</sup> See, for example, *Minnesota Statutes* 2017, Chapter 72A.201, Regulation of Claims Practices.

<sup>4</sup> Safelite Solutions, LLC, is a subsidiary of Safelite Group, Inc. In addition to being a claims administrator for auto glass repairs, the company also has a subsidiary that manufactures auto glass and a company that repairs and installs auto glass. For brevity, we use "Safelite" to refer to Safelite Solutions, LLC.

<sup>5</sup> *Safelite*, 229 F. Supp. 3d at 864.

<sup>6</sup> Declaration of Martin Fleischhacker in Opposition to Summary Judgment at 2, *Safelite Group, Inc. v. Rothman*, 229 F. Supp. 3d 859 (D. Minn. 2017) (No. 15-cv-1878).

<sup>7</sup> *Safelite*, 229 F. Supp. 3d at 866.



## Steering Allegation

The independent shops base their steering allegation on what Safelite's call center tells policyholders. The shops allege that Safelite's customer service representatives discouraged callers from choosing a non-network shop. They argue that Safelite accomplished this by telling callers they may have to pay the difference if they choose a glass shop that charges more than their insurance company is willing to pay. This practice is called "balance billing."

Under Minnesota law, consumers have the right to choose any glass repair shop, and insurance companies are required to inform consumers of that fact.<sup>8</sup> On the other hand, insurance companies are only obligated to pay shops "a competitive price that is fair and reasonable within the local industry at large."<sup>9</sup> If a shop charges more than the insurance company considers fair and reasonable, the case may go to arbitration.<sup>10</sup> There is also the potential that a shop could bill the consumer for the difference (balance). If a policyholder chooses a Safelite in-network shop, however, there is no chance of balance billing because the insurance companies and shops have already agreed on the price.

## Commerce's Investigation of Safelite

In the fall of 2013, one of the glass shops complained again to the Department of Commerce about Safelite steering callers to the Safelite network glass shops. Martin Fleischhacker, Commerce's Director of Investigations at the time, needed a new window for his vehicle and decided to go through the claims process personally. Mr. Fleischhacker opted to use Alpine Glass, an independent (non-Safelite-network) shop to do the work.

Mr. Fleischhacker and Alpine's owner called Mr. Fleischhacker's insurance company and were connected to the Safelite call center. There is some dispute in the court documents we reviewed about what occurred during Mr. Fleischhacker's call with Safelite. In the federal litigation, the judge noted in her memorandum that at his deposition, Mr. Fleischhacker said he felt like the representative was pressuring him not to use the non-network shop. The judge expressed surprise, however, that in a written statement four months later, Mr. Fleischhacker remembered more details.

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<sup>8</sup> *Safelite*, 229 F. Supp. 3d at 865. The law requires insurance companies to provide the following advisory statement to a person making a claim: "Minnesota law gives you the right to go to any glass vendor you choose, and prohibits me from pressuring you to choose a particular vendor." In addition, the law prohibits the insurance company from: requiring that the repair or replacement of motor vehicle glass and related products and services be made in a particular place or shop or by a particular entity, or by otherwise limiting the ability of the insured to select the place, shop, or entity to repair or replace the motor vehicle glass and related products and services; and engaging in any act or practice of intimidation, coercion, threat, incentive, or inducement for or against an insured to use a particular company or location to provide the motor vehicle glass repair or replacement services or products. See *Minnesota Statutes* 2017, 72A.201, subds. 6(7) and (14).

<sup>9</sup> *Ibid.*

<sup>10</sup> See *Minnesota Statutes* 2017, 65B.525; and 72A.201, subd. 6(14).

In his written statement, Mr. Fleischhacker said:

At multiple points in the call the Safelite representative warned me that I might be balanced billed by Alpine despite Alpine's explicit representation that it would not. I found these representations to be deceptive, coercive, and potentially confusing.<sup>11</sup>

Following this call, the owner of Alpine Glass wrote Mr. Fleischhacker to thank him for his business and asked for a meeting about Safelite. Mr. Fleischhacker met with the owner and Mr. Lloyd, attorney for the independent glass shops, to talk about their Safelite concerns. Separately, some of the independent glass shop owners held a conference call to pass on to Commerce what they referred to as "only the really good" recordings of Safelite allegedly violating the law.

Six months later in April 2014, Commerce formally launched an investigation into Safelite and the insurers who use Safelite to manage their claims in Minnesota: AAA, USAA, and American Family. Commerce assigned Theodore J. Patton as lead investigator. Mr. Patton was new to his job, having been hired by the Department three months earlier.

### **Information Disclosed by the Commerce Investigator**

In an e-mail dated September 22, 2014, to Mr. Patton, the independent glass shops' attorney, Mr. Lloyd, said, "I hope things are progressing with your investigations. Any update you can provide would be greatly appreciated."<sup>12</sup>

Mr. Patton responded a few minutes later, saying that Commerce had completed its investigation of AAA.<sup>13</sup> He went on to say that "a settlement offer has been issued and discussions between the Department and AAA's attorneys are underway." Mr. Patton also mentioned that another investigator in the office was investigating complaints against American Family, "which will likely result in a joint action."<sup>14</sup>

Most notably, Mr. Patton mentioned that the Attorney General's Office "continues to mull over the appropriate action to initiate against Safelite.... I am pushing for a [cease and desist order] against Safelite for failing to comply with the Department's subpoenas and engaging in unlicensed activity."<sup>15</sup>

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<sup>11</sup> *Safelite*, 229 F. Supp. 3d at 867. We found no evidence that Mr. Fleischhacker received any personal benefit or special treatment from Alpine glass shop; his insurance fully covered the work Alpine performed.

<sup>12</sup> Reigstad Declaration, Exhibit 28, *Safelite*, 229 F. Supp. 3d 859 (No. 15-cv-1878).

<sup>13</sup> *Ibid.*

<sup>14</sup> *Ibid.*

<sup>15</sup> *Ibid.* The state Commerce Commissioner has the authority to issue cease and desist orders under *Minnesota Statutes* 2017, 45.027, subd. 5a.

## OLA ANALYSIS

To determine whether Mr. Patton's disclosure to Mr. Lloyd complied with the Government Data Practices Act, we had to determine: (1) the classification of the data he disclosed, and (2) whether any provision of law authorized the disclosure if the data were classified as not public *at the time* of the disclosure.<sup>16</sup>

The data Mr. Patton disclosed to Mr. Lloyd was part of an active investigation for possible use in legal action against insurance companies and Safelite. Therefore, the data were subject to a provision in the Government Data Practices Act which says:

[D]ata collected by a government entity as part of an active investigation undertaken for the purpose of the commencement or defense of a pending civil legal action, or which are retained in anticipation of a pending civil legal action, are classified as protected nonpublic data pursuant to section 13.02, subdivision 13, in the case of data not on individuals and confidential pursuant to section 13.02, subdivision 3, in the case of data on individuals.<sup>17</sup>

According to this law, the data Mr. Patton disclosed are classified as "protected nonpublic" since they did not name individuals.<sup>18</sup> Under this classification, a government agency may not make the data public or disclose the data to the subject of the data.

However, state law sometimes allows an agency to disclose not public data in certain extraordinary situations. In the case of investigative data, the law allows disclosure in the following three situations: (1) to aid the law enforcement process, (2) to promote public health or safety, or (3) to dispel widespread rumor or unrest.<sup>19</sup> We do not think any of these disclosure authorizations applied to the data Mr. Patton disclosed to Mr. Lloyd. Specifically:

- Disclosing the data to Mr. Lloyd did not aid the law enforcement process since Mr. Lloyd is not a law enforcement official. Nor did Mr. Patton condition his sharing the information on obtaining additional information from Mr. Lloyd or his clients that would aid law enforcement.

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<sup>16</sup> Data classification according to Minnesota law can change over time so that at one point it is not public and later the same data can change to public. For example, under *Minnesota Statutes* 2017, 3.979, subd. 3(a), data the Legislative Auditor collects as part of an audit, evaluation, or investigation are not public until the Auditor releases a report or stops pursuing the audit, evaluation, or investigation.

<sup>17</sup> *Minnesota Statutes* 2017, 13.39, subd. 2.

<sup>18</sup> The Government Data Practices Act defines "protected nonpublic data" as "data not on individuals made by statute or federal law applicable to the data (a) not public and (b) not accessible to the subject of the data." *Minnesota Statutes* 2017, 13.02, subd. 13."

<sup>19</sup> *Minnesota Statutes* 2017, 13.39, subd. 2, says: "Any agency, political subdivision, or statewide system may make data classified as confidential or protected nonpublic pursuant to this subdivision accessible to any person, agency, or the public if the agency, political subdivision, or statewide system determines that the access *will aid the law enforcement process, promote public health or safety, or dispel widespread rumor or unrest.*" [emphasis added]

- Disclosing the data to Mr. Lloyd did not promote public health or safety since the issues in the Safelite case did not involve public health or safety.
- Disclosing the data to Mr. Lloyd did not dispel widespread rumor or unrest since none existed.

Having found no basis in law to justify Mr. Patton's disclosure to Mr. Lloyd, we asked the Department of Commerce if there were other factors that justified the disclosure.<sup>20</sup> We present their arguments and our assessment of the arguments in the following section.

## COMMERCE'S JUSTIFICATIONS FOR THE DISCLOSURE

In its response to OLA, Commerce justified Mr. Patton's disclosure with two arguments: (1) the information was about process rather than substantive, and (2) Mr. Patton needed to share information with Mr. Lloyd to keep the independent shops involved in the investigation and possible litigation.<sup>21</sup> We discuss the Department's two arguments and our response in the following sections.

### 1. Commerce said that the information was about process rather than substantive.

To support this argument, Commerce cited a Minnesota Supreme Court decision in *Westrom v. Minnesota Department of Labor and Industry* (2004). In that case, the question was whether the Department of Labor and Industry (DOLI) violated *Minnesota Statutes*, 13.39, when it released to news organizations its penalty orders against a company (and the company's written objections) for failing to maintain workers' compensation insurance.<sup>22</sup> In citing the case, the Department of Commerce argued that the Court drew a distinction between "process" and "substantive" information. It then argued that Mr. Patton did not violate the law because the information he shared with Mr. Lloyd was "process" information, not "substantive."<sup>23</sup>

According to the Department:

The Minnesota Supreme Court held that the orders DOLI issued as part of its investigation...constituted data collected as part of an active investigation, and the release of these substantive documents prior to a filing with the Office of Administrative Hearings would violate the MGDPA. Here...Mr. Patton did not

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<sup>20</sup> Elizabeth Stawicki, Legal Counsel, Office of the Legislative Auditor, letter to Sara Payne Lassetter, Attorney, Minnesota Department of Commerce, February 16, 2018.

<sup>21</sup> Kathleen Finnegan, General Counsel, Minnesota Department of Commerce, memorandum to Elizabeth Stawicki, Legal Counsel, Office of the Legislative Auditor, *Legal Opinion*, February 27, 2018 (Department of Commerce Legal Opinion).

<sup>22</sup> *Westrom v. Minnesota Department of Labor and Industry*, 686 N.W.2d 27, 29 (Minn. 2004).

<sup>23</sup> *Department of Commerce Legal Opinion*, 5.

provide Mr. Lloyd or his clients any substantive documents in the Department's investigations of AAA, American Family, and USAA.<sup>24</sup>

Although Commerce referred to "substantive" several times in summarizing the *Westrom* case, the Court's opinion never uses that term and does not appear to draw the distinction that Commerce asserts. Indeed, the case was about a completely different question. The Court was deciding whether the penalty orders and objections qualified as (1) "data collected" by a state agency (2) as part of an active investigation (3) undertaken in anticipation of a pending civil action.<sup>25</sup> DOLI contended that because the agency did not "collect" the orders but rather created them, those orders did not qualify as "data collected" under 13.39, and did not, therefore, fall under the Government Data Practices Act's "confidential" classification.<sup>26</sup>

In addition, the Court ruled against DOLI. It said that although DOLI created the orders, those orders were inextricably linked to the data DOLI collected during its investigation.<sup>27</sup> In our opinion, the data Mr. Patton shared with Mr. Lloyd was also inextricably linked to the data Commerce collected during its investigation.

## **2. Commerce said Mr. Patton needed to share information to keep the independent shops involved in the investigation and possible litigation.**

Commerce argued to us that it is often necessary to provide complainants with information so they will not become discouraged and stop cooperating with an investigation.<sup>28</sup> But there was no indication that Mr. Lloyd or his clients were discouraged about Commerce's response or unwilling to cooperate further. To the contrary, the evidence shows that the independent shops were encouraged that they had a "fresh ear" at Commerce.<sup>29</sup>

Mr. Patton added another argument. He told us that Mr. Lloyd and the glass shops were sources of information and potential witnesses, as well as complainants. He asserted that Commerce needed their records to verify what the insurance companies would report as work done in response to claims.<sup>30</sup>

In its legal opinion to OLA, Commerce used both arguments. It said:

Mr. Patton had reason to believe that Mr. Lloyd's clients, as both complainants and witnesses, would be needed to provide additional testimony during the course of the investigation. It is not uncommon during an investigation for complainants

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<sup>24</sup> *Ibid.*

<sup>25</sup> *Westrom*, 686 N.W.2d at 33-34.

<sup>26</sup> *Westrom*, 686 N.W.2d at 34.

<sup>27</sup> *Ibid.*

<sup>28</sup> *Department of Commerce Legal Opinion*, 5.

<sup>29</sup> *Safelite*, 229 F. Supp. 3d at 868.

<sup>30</sup> Theodore J. Patton, interviewed by OLA, in person, audio recorded, St. Paul, Minnesota, January 25, 2018.

or witnesses to become frustrated with the process when they do not see immediate results. Nor do the interests of complainants and witnesses necessarily align with those of the Department. However, for the sake of an investigation, an investigator will often assure a witness or complainant that it is taking their concerns seriously, and provide enough process information to encourage witnesses to continue to cooperate with the investigation.<sup>31</sup>

Again, there is no evidence that the shops or Mr. Lloyd were frustrated with the process or needed encouragement to cooperate. The shops had been complaining to Commerce for at least ten years without seeing much progress. It is highly doubtful they would not continue to cooperate with an investigation that was in their own interest.

Commerce also cited a Minnesota Court of Appeals decision to support its argument, but we do not think the case supports the Department. In fact, we do not think case—*Unke v. Independent School District No. 147* (1994)—is relevant.

In *Unke*, a guidance counselor sued the Dilworth school district after the school board, in an open meeting, discussed allegations of a sexual harassment complaint against him by a student.<sup>32</sup> The board voted to terminate the guidance counselor at the same meeting. The student later declined to testify at Mr. Unke's disciplinary hearing, and the school board reinstated Mr. Unke.

The Court held that the disclosure of personnel information at the school board meeting violated *Minnesota Statutes* 13.43, subd. 2(a). The Court noted that the law allows a public agency—the employer—to make certain information about an employee public, but restricts disclosure of information about a disciplinary action until a final disposition of the action has occurred.<sup>33</sup>

In its response to OLA, Commerce said the *Unke* case supported its position that sharing some information with participants in an investigation is necessary to advance the investigation. The Department said:

The *Unke* court did not discuss, nor did the parties appear to have raised, any concerns about the data the school board would have had to share with the complainant (student), her mother, and two other students to conduct the interviews.

Moreover, some conversation with the complainant and her mother about the investigative process was inevitable in order for the complainant to decline to testify at the discipline hearing. Such disclosure would have been necessary to the investigative process. Likewise, here, the data Mr. Patton shared with

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<sup>31</sup> *Department of Commerce Legal Opinion*, 5.

<sup>32</sup> *Unke v. Independent School District No. 147*, 510 NW.2d 271, 272 (Minn. App. 1994), review denied (Minn. Mar. 15, 1994).

<sup>33</sup> *Unke*, 510 NW.2d at 273.

Mr. Lloyd was shared in Mr. Lloyd's capacity as counsel for the complainants and witnesses in the investigation.<sup>34</sup>

There are several reasons why this case does not apply but chief among them is that the Court's ruling concerned *personnel* data under section 13.43 of the Minnesota Government Data Practices Act, not civil investigative data under section 13.39. In fact, Commerce essentially acknowledged that this case has no relevance by saying the "court did not discuss...any concerns about the data the school board would have to share." If the court did not discuss the issue, the ruling does not apply.

Further, the Department's argument is based on speculation since there is no evidence that the school board shared any investigative data with the mother. But even if the board had shared some investigative information, we have no idea what that might have been and whether it contained the same level of detail that Mr. Patton shared with Mr. Lloyd.

## ADDITIONAL COMMENTS

In closing, we want to offer some additional comments based on our own experience conducting investigations.

### OLA Investigations

OLA often conducts investigations based on information we receive from whistleblowers and complainants. From that experience, we understand that it may be useful at times for investigators to share a general status report with whistleblowers and complainants. It helps build a trusting relationship with whistleblowers and complainants, and it may help bring forth additional information helpful to an investigation.

Nonetheless, we think Mr. Patton went too far and provided more details than necessary. Commerce had already demonstrated its willingness to proceed with an investigation, and Mr. Lloyd and his clients had demonstrated their willingness to cooperate and provide the Department with information. As a result, Mr. Patton did not need to disclose that a settlement offer was on the table with AAA or that the Attorney General's Office was "mulling over" action to take against Safelite. Mr. Patton essentially shared information about the state's possible legal strategy against Safelite, making it appear Commerce was working on behalf of the independent glass shops rather than as an independent enforcer of state law.

### Final Comment

Based on our review, we think Mr. Patton acted from inexperience. Moreover, we are not aware of any harm to individuals that resulted from Mr. Patton's disclosure to Mr. Lloyd. The harm was to the Department of Commerce itself. The disclosure, as well as other actions by other Commerce officials, created a perception that the Department was not investigating Safelite objectively or acting in strict compliance with state law.

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<sup>34</sup> *Department of Commerce Legal Opinion*, 6.





April 13, 2018

James R. Nobles  
Legislative Auditor  
Office of the Legislative Auditor  
658 Cedar Street, Suite 140  
St. Paul, MN 55155

Dear Mr. Nobles,

Thank you for the opportunity to comment on the Office of Legislative Auditor's ("OLA") report regarding statements made by a Department of Commerce ("Department") investigator during the investigations of auto glass claims processed by Safelite Solutions for insurers regulated by the Department.

The investigations of Auto Club Group, Inc., American Family, and USAA were in response to allegations that these insurance companies were steering their insureds to Safelite AutoGlass through the insurance companies' use of Safelite Solutions as a third-party claims administrator. The Department also received complaints that the insurance companies were underpaying independent glass shops who had to undertake serial arbitrations against the insurance companies to recoup payment for their services. In the course of these investigations, a Department investigator shared procedural information about the Department's concurrent investigations with the counsel representing the glass shop complainants and witnesses believing that he did so in accordance with the Minnesota Government Data Practices Act ("MGDPA").

The Department takes its obligations under the MGDPA very seriously, and strives to balance public confidence in governmental process, accountability and transparency, and protection of the privacy rights of individual citizens and business entities who are the subjects of government data. In this matter, we acknowledge that the OLA has found that the disclosure of information was not made in compliance with the MGDPA and agree that the investigator acted in good faith.

The Department has since implemented new training for all Department employees on the MGDPA. The Department has also provided additional resources to new investigators to ensure compliance with the MGDPA, to establish uniformity in investigative techniques, and to provide mentorship and enhanced on-the-job training. The Department strives to serve as a trusted public resource, and welcomes any additional guidance on best practices in applying the MGDPA to the investigative process.

James R. Nobles

April 13, 2018

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Finally, I would like to thank you for the OLA's thoughtful and thorough review of this matter.

Sincerely,



Jessica Looman  
Commissioner

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