

LOUISIANA STATE BOARD
OF PRIVATE SECURITY EXAMINERS

In Re: APPLICATION OF TIGERSWAN,
LLC, FOR LICENSE TO OPERATE
AS A PRIVATE SECURITY COMPANY

Matter No. _____

**REPLY TO TIGERSWAN’S OPPOSITION
TO PETITION TO INTERVENE**

Petitioning organizations (“Petitioners”) seeking to intervene in the appeal of TigerSwan, LLC, of its license denial by this Board, submit the following reply to TigerSwan’s Opposition to the Petition for Intervention.

TigerSwan cites no legal authority whatsoever for its argument that Petitioners should not be allowed to intervene in this proceeding. Petitioners have a justiciable interest in this matter because they would be particularly vulnerable and exposed to the irresponsible, dangerous, and reckless actions and conduct of TigerSwan if it is granted a license to operate in Louisiana.

Procedural History

On or about June 19, 2017, TigerSwan, a private security company based in Apex, North Carolina, applied to the Louisiana State Board of Private Security Examiners (“the Board” or “LSBPSE”) for a license to operate in Louisiana. On July 17, 2017, the Board denied TigerSwan’s application, reportedly in part on the basis that “they were denied licensure twice in Dakota and are pending litigation.”¹ TigerSwan appealed the denial of its application and is awaiting a hearing. On November 9, 2017, the Petitioning Organizations, 350 New Orleans, Atchafalaya Basinkeeper, Gulf Restoration Network, L’eau Est la Vie (“Water Is Life”) Camp,

¹ *Private security firm that surveilled DAPL protests denied Louisiana license*, KATC.com, Jul. 20, 2017, available at <http://www.katc.com/story/35902508/private-security-firm-that-surveilled-dapl-protests-seeks-louisiana-license>.

Louisiana Bucket Brigade, and Louisiana Crawfish Producers Association-West, moved to intervene in TigerSwan's appeal as parties in interest.² On March 8, 2018, TigerSwan served Petitioners with its Opposition to their Petition to Intervene.

Law and Argument

This Board has discretion to allow parties in interest to intervene in adjudications.³ TigerSwan's brief cites no legal authority at all to suggest otherwise.

TigerSwan suggests that Petitioners have no "justiciable interest in this proceeding" because their interest "is in opposing the Bayou Bridge Pipeline." Opp. Brief at 1. However, Petitioners' work to oppose this particular pipeline is precisely what makes them vulnerable to reckless and dangerous actions and conduct of TigerSwan if it is granted a license to operate in this state and provide security services for the company constructing the pipeline.

TigerSwan also failed to note that the Petition described in great detail the Petitioners' specific concerns about TigerSwan, which are based on indepth reporting, leaked internal documents, as well as court documents from other states where TigerSwan has operated. *See* Petition to Intervene, ¶¶ 7-34. In fact, Petitioners detailed the targeting of a member of one of the petitioning organizations in a defamatory smear campaign in which TigerSwan is alleged to be involved in separate civil rights litigation in Pennsylvania. *Id.* at ¶¶ 19-25.

Moreover, through a public records request to the LSBPSE, Petitioners obtained a transcript of a deposition of a TigerSwan employee who sought a license through this Board after

² In the original petition, Bold Louisiana appeared as a Petitioning Organization. Subsequent to the filing of the petition, Bold Louisiana discontinued operations in the state and is therefore no longer seeking to intervene in this proceeding.

³ While there appears to be no precedent regarding intervenors in adjudications before this Board, interventions are routinely allowed in permitting and licensing proceedings in other agencies and contexts. *See e.g., Save Ourselves, Inc. v. Louisiana Env'tl. Control Comm'n*, 452 So.2d 1152, 1160 (La.1984); *In the Matter of Recovery I, Inc.*, No. 92 CM 2352, 622 So.2d 272 (La. App. 1 Cir. 1993).

TigerSwan’s application was rejected without notifying the Board that she was working for TigerSwan at the time. *See* Deposition of Lisa Smith (“Smith Deposition”), before the Louisiana State Board of Private Security Examiners, Sept. 19, 2017, annexed hereto as Exhibit A. As noted above, TigerSwan was denied a license to operate in Louisiana on July 19, 2017. According to the Louisiana Secretary of State, Smith’s company LTSA, LLC, filed its registration papers with the state on August 3, 2017. *See* LTSA, LLC, Registration, Louisiana Secretary of State, annexed hereto as Exhibit B. According to the LSBPSE’s website, Smith applied for a license for LTSA to operate as a private security company in Louisiana on August 4, 2017.⁴ According to her deposition, she was employed at TigerSwan and had been since February 2016, but failed to disclose that on her application materials. Smith Deposition at pp. 7:24-25, 8:1-11, 11:15-25. Also, according to the deposition, TigerSwan was present through its counsel. *Id.* at 3.

In light of the concerns set out in the petition to intervene and raised by the application of a TigerSwan employee who did not disclose that status with the board, TigerSwan representatives should be questioned about their awareness of or possible role in these efforts, and any others that may violate the law governing private security companies, and/or serve as a basis for denial of a license application, such as:

- La. R.S. 37:3289(4) – Efforts to deceive or defraud the public;
- La. R.S. 37:3289(8) – Aiding or abetting a person to evade the provisions of this Chapter or knowingly combining or conspiring with an unlicensed person, or acting as an agent, partner, associate or otherwise, of an unlicensed person with intent to evade provisions of this Chapter;
- La. R.S. 37:3276.1(B)(b) – whether TigerSwan “pose[s] a threat to the public interest of this state or to the effective regulation of private security companies,” or “create[s] or enhance[s] the dangers of unsuitable, unfair, or illegal practices, methods, and

⁴ *See* <http://lsbpse.com/disciplinary-actions/>.

operations in the activities authorized” by the law governing private security companies.

- La. R.S. 37:3276(G) – prohibiting applicants from “soliciting or operating a private security business prior to being issued a license.”

As described more fully in the Petition to Intervene, TigerSwan’s prior activities and associations demonstrate all too clearly that Petitioners have cause for concern that it poses a serious threat to public safety, particularly to those Louisiana residents and organizations opposed to the pipeline it would provide security and other services for.

Petitioners all have a demonstrable and tangible stake and concern in this proceeding as they fall into the category of opponents to a pipeline project pursued by a company that has contracted with TigerSwan in connection with related projects in other states. Their legitimate and serious concerns based on the evidence and reports of TigerSwan activities elsewhere should be made part of the record of the proceedings in this matter for any subsequent judicial review.

March 27, 2018

Respectfully Submitted,



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Counsel for Petitioners-Intervenors

Exhibit A

LOUISIANA STATE BOARD OF
PRIVATE SECURITY EXAMINERS

IN RE:
TIGERSWAN, LLC

Testimony of

LISA SMITH

taken on Tuesday, September 19, 2017, before Kelly
S. Perrin, Certified Court Reporter in and for the
State of Louisiana, at the offices of Louisiana
State Board of Private Security, 15703 Old Hammond
Highway, Baton Rouge, Louisiana.

COURT REPORTERS OF LOUISIANA, L.L.C.
9614 Brookline Avenue, Suite A
Baton Rouge, Louisiana 70809
PHONE (225)201-9650 * FAX (225)201-9651
E-Mail: depos@courtreportersla.com

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I N D E X

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Caption 1

Appearances 3

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Examination

BY MS. AUCOIN 5, 21

BY MR. WHITTINGTON 20

Reporter's Certificate 25

* * * * *

Exhibits:

#1 (WITNESS'S RESUME') 12

#2 (EMAILS) 16

1 APPEARANCES:

2

3 Representing LISA SMITH, LTSA, LLC

4 WILLIAMSON, FONTENOT, CAMPBELL & WHITTINGTON
5 955 MCCLUNG STREET
6 BATON ROUGE, LA 70802

7 BY: CHRISTOPHER L. WHITTINGTON

8

9 Representing TIGERSWAN, LLC THROUGH ITS OWNER,
10 JAMES REESE

11

12 ROEDEL, PARSON, KOCH, BLACHE, BALHOFF &
13 MCCOLLISTER
14 8440 JEFFERSON HIGHWAY, SUITE 301
15 BATON ROUGE, LA 70809

16 BY: ROSS A. DOOLEY
17 AND

18 BY: CHRISTIAN J. RHODES

19

20 Representing LOUISIANA STATE BOARD OF PRIVATE
21 SECURITY EXAMINERS

22

23 DEPARTMENT OF PUBLIC SAFETY & CORRECTIONS
24 OFFICE OF STATE POLICE
25 7979 INDEPENDENCE BOULEVARD, SUITE 307
BATON ROUGE, LA 70896

26

27 BY: ADRIENNE E. AUCOIN
28 AND

29 BY: WAYNE R. CROUCH

30

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33

1 APPEARANCES CONTINUED:

2 ALSO PRESENT:

3 JERICHA HILBERT

4 FABIAN BLACHE

5 BRIDGETTE HULL

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20 Reported by:

21 Kelly S. Perrin, Certified
22 Court Reporter No. 23035 in and
23 for the State of Louisiana

24

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25

1 S T I P U L A T I O N

2

3 IT IS STIPULATED AND AGREED by and
4 amongst counsel that the deposition of LISA SMITH,
5 on September 19, 2017, is hereby taken under the
6 Louisiana Code of Civil Procedure for all purposes
7 as permitted under law.

8 The witness reserves the right to read
9 and sign the deposition. The original is to be
10 delivered to and retained by ADRIENNE E. AUCOIN for
11 proper filing with the Clerk of Court.

12 All objections, except those as to the
13 form of the question and/or responsiveness of the
14 answers, are reserved until the time of the trial
15 of this cause.

16

17 * * *

18

19 KELLY S. PERRIN, Certified Court Reporter
20 in and for the State of Louisiana, officiated in
21 administering the oath to the witness.

22

23

24

25

1 LISA SMITH,
2 2204 Maybrook Drive, Raleigh, North Carolina 27610,
3 after having been first duly sworn by the
4 above-mentioned Certified Court Reporter, did
5 testify as follows:

6 EXAMINATION

7 MS. AUCOIN: (BEGINNING AT 9:40 A.M.)

8 Q Like I said before, my name is Adrienne
9 Aucoin. I'm an attorney for the Board of Private
10 Security Examiners. I'm just going to ask you a
11 couple of questions. Have you ever -- well, first,
12 please state your name for the record.

13 A Lisa Smith.

14 Q And what's your address?

15 A 2204 Maybrook Drive, Raleigh, North
16 Carolina 27610.

17 Q Have you ever been deposed before?

18 A No.

19 Q Okay. So I just want to, you know, give
20 you a few little things before we start. Just make
21 sure you answer out loud. Don't nod your head so
22 the court reporter can record your answers. And if
23 you don't understand my questions, just let me know
24 and I will rephrase it or repeat it. Okay?

25 A Yes.

1 Q Okay. Did you do anything to prepare for
2 today's deposition?

3 A No.

4 Q Okay. Did you meet with your lawyer?

5 A Yes.

6 Q Okay. Was anyone else present?

7 A Other than the lawyer?

8 Q Correct.

9 A No.

10 Q Okay. What is your present employment?

11 A I work for Tigerswan.

12 Q What's your educational background?

13 A I have a bachelors degree in criminal
14 justice and a masters degree in information
15 systems.

16 Q Have you ever been arrested or convicted
17 of any misdemeanor or felony?

18 A No.

19 Q And what's your employment history for
20 the past ten years?

21 A I worked for the nuclear power Company in
22 North Carolina for ten years. And then I went to
23 Department of Public Safety in Juvenile Justice for
24 three and a half years. And then I went to work
25 for Tigerswan for the last year and a half.

1 Q And were all these previous employments,
2 were they in Louisiana or in another state?

3 A In North Carolina.

4 Q Okay. Do you currently work for
5 Tigerswan?

6 A Yes.

7 Q And what is your -- do you recall when
8 you were first hired by Tigerswan?

9 A Yes, February of 2016.

10 Q And what is your position with Tigerswan?

11 A A watch officer.

12 Q Could you explain for me what that is?

13 A I work in the Security Operations Center.
14 And, basically, what we do is -- just keep watch of
15 all the accounts that they have, anything that's
16 going on, whether it be weather, criminal
17 activities, just to report to let the clients know
18 that's in the area, what's going on in the area.

19 Q Okay. So you know James Reese?

20 A I do.

21 Q Okay. And what is his relationship with
22 Tigerswan?

23 A He's the CEO.

24 Q Are there any other CEOs or owners of
25 Tigerswan?

1 A Not to my knowledge.

2 Q And how long have you known Mr. Reese?

3 A I've seen Mr. Reese maybe three, four
4 times. I don't know him.

5 Q Did you know him prior to your employment
6 with Tigerswan?

7 A No.

8 Q And who hired you to be employed with
9 Tigerswan?

10 A I don't understand.

11 Q When you were hired, who did you
12 interview with Tigerswan?

13 A I interviewed with the Human Resource
14 Director Loretta Moran and Todd Walker.

15 Q Are you aware that Tigerswan applied for
16 license with the Board of Private Security
17 Examiners in Louisiana?

18 A I am.

19 Q Are you aware that they were denied that
20 application?

21 A I am.

22 Q When were you made aware of that denial?

23 A I don't recall the exact time frame.

24 Q Do you recall the circumstances of how
25 you became aware of that denial?

1 A Just from talk, just office talk.

2 Q Are you the owner of LTSA, LLC?

3 A I am.

4 Q And what does LTSA stand for, if
5 anything?

6 A It doesn't stand for anything.

7 Q When did you first create LTSA, LLC?

8 A When I applied for the application here
9 in Louisiana.

10 Q Do you recall when that was?

11 A In the month of August.

12 Q And what business does LTSA engage in or
13 does it intend to engage in?

14 A Private security.

15 Q Have you applied for a license with the
16 Board of Private Security Examiners?

17 A Yes.

18 Q And that license, is it pending?

19 A Yes.

20 Q What's the physical location of your
21 offices for LTSA in Louisiana, if any?

22 A I don't know the address without looking
23 at it, but it's in Lafayette.

24 Q And when did you first establish a
25 presence in Lafayette for LTSA?

1 A In August.

2 Q Does LTSA have any type of business
3 relationship with Tigerswan?

4 A No.

5 Q Do you know an individual named Brandon
6 Nix?

7 A No.

8 Q Have you ever heard of the Bayou Bridge?

9 A Yes.

10 Q Okay. What is the Bayou Bridge?

11 A I don't know.

12 Q Okay. Have you ever spoken to anyone
13 with the Bayou Bridge?

14 A No, not to my knowledge.

15 Q I'm going to show this to you and I'm
16 going to give a copy to the two of you. If you
17 don't mind, if you can take a look at that and
18 describe, I guess, what document I've placed in
19 front of you for the record?

20 A That's my resume'.

21 Q And if I'm correct, it lists the places
22 that you've been employed?

23 A Yes.

24 Q Okay. Is Tigerswan listed on there?

25 A No.

1 Q Is there a reason why you did not include
2 Tigerswan in your application?

3 A Yes. For Metlife MSOC, it's contracted
4 out by Tigerswan. I didn't work at the
5 headquarters at Tigerswan. I worked for Metlife.
6 Tigerswan is the, I guess, the contractor for them.

7 So I worked at the physical location was
8 Metlife Security Operations Center. It's just I
9 was employed by Tigerswan to go to this site to
10 work.

11 MS. AUCOIN:

12 If there's no objection, I'd like to have
13 that as Exhibit #A to the deposition.

14 MR. WHITTINGTON:

15 Okay. Can you tell me where it came
16 from? Did she submit this?

17 BY MS. AUCOIN:

18 Q Oh, I'm sorry. Is this -- when you
19 applied for your license with the Board of Private
20 Security of Examiners, did you submit this resume'
21 in connection with that?

22 A I did.

23 MR. WHITTINGTON:

24 Look at all three pages.

25 MS. AUCOIN:

1 Yeah, take your time.

2 MR. WHITTINGTON:

3 Make sure it's complete.

4 A Yes.

5 MR. WHITTINGTON:

6 Yes out loud.

7 A Yes. Yes.

8 MS. AUCOIN:

9 Any objection?

10 MR. WHITTINGTON:

11 None.

12 MS. AUCOIN:

13 Okay. I'll label this as Board #1 for
14 the record.

15 BY MS. AUCOIN:

16 Q And who pays you your salary if you're
17 salaried?

18 A I get paid by Tigerswan.

19 Q Have you ever -- do you have a LinkedIn
20 profile or any type of social media tied in with
21 your employment?

22 A I have a LinkedIn profile.

23 Q LinkedIn profile. Okay. Have you ever
24 stated on your profile that you've been employed by
25 Tigerswan?

1 A Yes.

2 Q You have. Okay. Is it still listed as a
3 place of your -- that you're employed by today?

4 A I don't remember.

5 Q Okay. I'm going to, I guess, place this
6 in front of her. So you said a moment ago that you
7 have listed Tigerswan as a place of your employment
8 on your LinkedIn profile?

9 A I did not say that.

10 Q Okay. And, I guess refresh --

11 A I said I don't remember.

12 Q You don't remember. Okay. Could you
13 take a look at what I have placed in front of you?

14 A Yes.

15 Q Okay. I guess, could you identify it for
16 the record?

17 (MR. DOOLEY ENTERS THE ROOM.)

18 MR. WHITTINGTON:

19 I mean, have you seen this email before?
20 She's asking you to identify that on your own
21 personal knowledge if you know what it is.

22 A I don't see a email. What email address?

23 MR. WHITTINGTON:

24 Her question is, do you have first-hand
25 knowledge of what this is?

1 A No, I do not.

2 BY MS. AUCOIN:

3 Q And I guess what I'm trying to direct you
4 to the portion, not necessarily the top of the
5 email, but what's contained therein. It's
6 referenced to your LinkedIn profile.

7 MR. WHITTINGTON:

8 Well, I'm going to object to the form of
9 the question.

10 You're telling her what it is, and you
11 need to ask her what it is.

12 BY MS. AUCOIN:

13 Q Could you, I guess, identify what's
14 contained in the body of the email?

15 MR. WHITTINGTON:

16 If you know.

17 BY MS. AUCOIN:

18 Q If you know.

19 A This contains some of what my LinkedIn
20 page states.

21 Q Okay. Indicating that at one point in
22 time, you listed Tigerswan as a place of your
23 employment?

24 A Correct. Yes.

25 MS. AUCOIN:

1 Okay. I'd like to offer this as Exhibit
2 #B, unless you have any objections?

3 MR. RHODES:

4 Well, I mean, real quick question.
5 Procedurally, have you offered the -- that
6 document as Exhibit A? Has it been offered
7 yet?

8 MS. AUCOIN:

9 Exhibit 1, yes, if I didn't officially
10 follow through.

11 MR. WHITTINGTON:

12 You did because she identified it as
13 being true and correct.

14 MR. RHODES:

15 Okay.

16 MS. AUCOIN:

17 Yes.

18 MR. WHITTINGTON:

19 She has not identified this as being true
20 and correct. You can attach it. But if
21 you're going to use it as evidence, it's not
22 been authenticated.

23 So we would object to it as being used in
24 evidence, but you could attach it as being
25 referred to as Board #2.

1 MS. AUCOIN:

2 Okay. That's fine.

3 MR. WHITTINGTON:

4 Okay.

5 MR. RHODES:

6 One and two or A and B?

7 MR. WHITTINGTON:

8 One and two. I'm sorry.

9 MR. RHODES:

10 Okay.

11 MR. CROUCH:

12 Let's take a break.

13 MR. WHITTINGTON:

14 Okay.

15 (A short recess was taken in the
16 proceedings.)

17 MR. WHITTINGTON:

18 She has a correction.

19 BY MS. AUCOIN:

20 Q Okay.

21 A Yes. The month that I obtained the
22 office in Lafayette would be July instead of
23 August.

24 Q Okay. Thank you for that. I appreciate
25 that. We just have a few more questions for you.

1 Okay.

2 How did you -- back to that office, I
3 guess, how did you come to get an office at the
4 location? What process did you go through?

5 A Went online and searched the virtual
6 offices in the area and filled out the application.

7 Q Okay. Did you engage -- you engaged in
8 all of the setup of the office yourself?

9 A I did.

10 Q And how many times have you gone to that
11 office?

12 A One.

13 Q Once. Was that to pick up the keys or to
14 set up shop? What did you do when you went there?

15 A I went to look at the office. When I
16 came up to put the application in, I went by the
17 office to check it out.

18 Q Okay. And did you physically pick up the
19 keys for the office when you finally paid for it, I
20 guess?

21 A Yes.

22 Q Would there be any reason for the company
23 that you rented from to believe that Brandon Nix
24 was picking up the keys?

25 A No.

1 Q What made you decide to open up a private
2 security company in Louisiana?

3 A The opportunities were good.

4 Q Have you had any contacts with Louisiana
5 prior to opening the company, LTSA; correct?

6 A As far as opening a company?

7 Q Any contacts with Louisiana period?

8 A Yes. I visited Louisiana before.

9 Q And why did you decide to set up your own
10 private security company while you're currently
11 working for one private security company?

12 A Because the contract that I was working
13 at Metlife was ending, so I needed a job. And I
14 knew that I needed to move forward on trying to
15 establish something else before that contract
16 ended.

17 Q Okay.

18 A And that's when I reached out.

19 Q Okay. And when is your contract with,
20 you said, Met -- is it Metlife?

21 A Yes.

22 Q When is that supposed to expire?

23 A It has. It's already expired.

24 Q So the reason you set up your company
25 wasn't in response in any way, shape, or form to

1 Tigerswan's application denial?

2 A That's correct.

3 Q It was in response to the denial?

4 A No, it was not.

5 Q I just wanted to make sure we're on the
6 same page. What kind of private security prospects
7 do you have for your business?

8 A I don't have any.

9 Q Okay. And whose paying for your office
10 space?

11 A I am.

12 Q Okay. And do you have any intention to
13 bid on any contracts dealing with Bayou Bridge or
14 the Dakota Pipeline?

15 A I don't know.

16 MS. AUCOIN:

17 I don't think I have any other questions
18 unless one of y'all do?

19 MR. RHODES:

20 Do you have any questions?

21 MR. WHITTINGTON:

22 I have one question or maybe a couple of
23 questions.

24 BY MR. WHITTINGTON:

25 Q You said that LTSA doesn't stand for

1 anything in particular; does it?

2 A That is correct.

3 Q But the letters are chosen from
4 something.

5 A From loved ones in my family.

6 Q Okay. And L would be?

7 A Lisa.

8 Q And the T would be?

9 A Tracey.

10 Q Who is she?

11 A Tracey is my Goddaughter.

12 Q And Stacy would be who?

13 A That's my brother.

14 Q And that's the S.

15 A The S.

16 Q And then A would be who?

17 A Aaron, my son.

18 Q Okay. And that's the reason you chose
19 those letters?

20 A Yes.

21 MR. WHITTINGTON:

22 All right. Thank you.

23 BY MS. AUCOIN:

24 Q Okay. And you have no connection with
25 Tigerswan other than your employment?

1 A I don't understand the question.

2 Q Your only relationship to Tigerswan is
3 that you're employed by them; correct?

4 A That's correct.

5 MS. AUCOIN:

6 I think that's it.

7 MR. WHITTINGTON:

8 Okay. She's going to read and sign.

9 (ENDING AT 10:11 A.M.)

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WITNESS' CERTIFICATE

I, LISA SMITH, the undersigned, do hereby certify that I have read the foregoing deposition taken on September 19, 2017, and it contains a true and accurate transcript of the testimony given by me:

() Without corrections.

() With corrections as reflected on the Errata Sheet(s) prepared by me and attached hereto consisting of _____ pages.

LISA SMITH

DATE

REPORTED BY: KELLY S. PERRIN, CCR

1 R E P O R T E R ' S C E R T I F I C A T E

2 I, KELLY S. PERRIN, a Certified Court
3 Reporter, Certificate #23035, in good standing with
4 the State of Louisiana, as the officer before whom
5 this testimony was taken, do hereby certify that
6 LISA SMITH, to whom oath was administered, after
7 having been duly sworn by me upon authority of R.S.
8 37:2554, did testify as hereinbefore set forth in
9 the foregoing 23 pages;

10 That this testimony was reported by me in
11 stenographic machine shorthand by Computer-Aided
12 Transcription, transcribed by me or under my
13 personal direction and supervision, and is a true
14 and correct transcript to the best of my ability
15 and understanding;

16 That the transcript has been prepared in
17 compliance with transcript format guidelines
18 required by statute or by rules of the board, that
19 I have acted in compliance with the prohibition on
20 contractual relationships, as defined by Louisiana
21 Code of Civil Procedure Article 1434 and in rules
22 and advisory opinions of the board; that I am not
23 of counsel nor related to any person participating
24 in this cause and am in no way interested in the
25 outcome of this event.

1 This certification is valid only for a
2 transcript accompanied by my handwritten or digital
3 signature and the image of my State-authorized seal
4 on this page.

5 Signed:

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7 KELLY S. PERRIN,CCR

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Lisa Smith

2204 Maybrook Drive • Raleigh N.C.
(919) 464.3042 • lwsmith91@aol.com

Professional Experience

Reliant Monitoring Services

Cary, N.C. Mar 2016 – Present (PT)

Electronic Monitoring / GPS Device Installer / Dispatcher

- Install, service and remove electronic monitoring equipment in designated location
- Schedule time and place with clients to complete all work
- Maintain inventory of equipment
- Maintain communication with client, dispatch and agency regarding work being performed
- Complete field form in timely manner
- Monitor emails, pull up map of NC and assign closest installer to city.
- Investigate issues or complaints that may arise from installer and/ or monitoring agency.

METLIFE MSOC

Cary, N.C. Feb 2016 - Present

Site Security Watch Officer Analyst

- Responsible for monitoring and coordination of global site security operations, personnel security assistance, asset protection, crime prevention, security alarm management, incident management, communications and maintaining good external response partner relationships with public safety/first responder organizations.
- Provide situational awareness to Director, MetLife Security Operation Center and Stakeholders through production, accuracy, and dissemination of produced information products. Maintain daily common operating picture that provides awareness of MetLife operations worldwide.
- Knowledge of security systems and programs. This includes and is not limited to camera's, On Guard Lenel, Picture Perfect, Citrix, Visual Command Center, and alarm systems
- Knowledge of principles and procedures for new hire training, leadership, and information systems

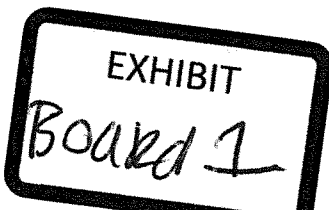
DEPARTMENT OF PUBLIC SAFETY/DIVISION OF JUVENILE JUSTICE

Raleigh, N.C. Sept 2012 – Feb 2016

Youth Transportation Driver

Transportation Coordinator (fill in)

- Complete and monitor a daily schedule of transportation staff
- Communicate directly with transportation staff with updates on location and timing.



- Insure delivery and enforcement of on-the-road orientation and rules and regulations to transportation teams
- Transport youth in secure custody to scheduled appointments (doctor office, court, assessments, training schools, etc)
- Conduct Interstate Compact /Surveillance of juveniles

SECURITAS SECURITY/ SHEARON HARRIS NUCLEAR PLANT, New Hill

August 2001 – June 2011

Armed Nuclear Security Lieutenant

- Response team leader
- Monitor and tested IDS on daily basis
- Analyze and defend nuclear reactors for vital area (VA) components and identify threats with help of assigned weapons and security tactics.
- Implement practices in the areas of workplace safety, security, and risk management to ensure compliance with regulatory requirements
- Deliver training for new employees, and continuing employees
- Provide supervision to direct reports, including coaching, formative feedback and performance evaluations
- Maintain wide emergency communication system
- Perform regular foot patrolling on entire protected area (PA), vital area (VA) installations and gates to ensure nuclear facility's security.
- Ensure quality surveillances through automatic instruction check instruments and ensure efficient nuclear security system.
- Prepare and monitor communication and security systems to supplement security essentials.
- Supervise and monitor CCTV's centralized alarm system and warning systems and detect any unlawful presence in high security zone.

NORTH CAROLINA CORRECTIONAL INSTITUTION for WOMEN Raleigh N.C.

January 1993 – August 2001

Correctional Sergeant

- Operate switchboard and direct calls to appropriate personnel
- Supervised and trained Correctional Officers
- Monitored, coordinated and processed inmates through DCI
- Prepared reports, schedules and annual performance evaluations
- Transport inmates in secured custody

Education

University of Phoenix, Phoenix, Arizona

April 2014 – August 2016

Master of Information Systems

GPA 3.68

University of Phoenix, Phoenix, Arizona

March 2012 - March 2014

Bachelor of Criminal Justice Admin/Management

GPA 3.58

Skilled in:

- Effective communication
- Planning and organizing
- Confidentially and compliance in security and safety procedures
- Microsoft Word, Excel, PowerPoint
- Monitoring, Judgment and Decision Making

Executive Secretary

From: Stephanie Richardson
Sent: Friday, August 4, 2017 9:00 PM
To: Executive Secretary; Wendy
Subject: LTSA LLC/Lisa Smith: Snippets from her LinkedIn Profile

Snippets from Lisa Smith's LinkedIn profile... The Google result notes "Lisa Smith, Watch Officer at TigerSwan/MetLife SOC"; however, the actual profile does NOT contain TigerSwan's name...

Lisa Smith | Professional Profile - LinkedIn

<https://www.linkedin.com/in/lisa-smith-73756544>

Cary, North Carolina - Acting IT Security Analyst - TigerSwan / MetLife SOC

View the profile for Lisa Smith, Watch Officer at TigerSwan / MetLife SOC in Cary, North Carolina, who attended University of Phoenix.



Exhibit B



Louisiana
**SECRETARY
OF STATE**
TOM SCHEDLER

(<https://www.sos.la.gov/Pages/default.aspx>)

Search for Louisiana Business Filings

Effective January 1, 2018, business owners in the following parishes will be required to file all available business documents online through *geauxBIZ*: Ascension, Bossier, Caddo, Calcasieu, East Baton Rouge, Jefferson, Lafayette, Livingston, Orleans, Ouachita, Rapides, St. Tammany, Tangipahoa and Terrebonne.

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Name	Type	City	Status
LTSA LLC	Limited Liability Company	LAFAYETTE	Active

Previous Names

Business: LTSA LLC
Charter Number: 42754404K
Registration Date: 8/3/2017

Domicile Address

122 JAMES COMEAUX ROAD
 SPC
 LAFAYETTE, LA 70508

Mailing Address

122 JAMES COMEAUX ROAD
 SPC
 LAYAFETTE, LA 70508

Status

Status: Active
Annual Report Status: In Good Standing
File Date: 8/3/2017
Last Report Filed: N/A
Type: Limited Liability Company

Registered Agent(s)

Agent:	LISA SMITH
Address 1:	122 JAMES COMEAUX RD
Address 2:	SPC
City, State, Zip:	LAFAYETTE, LA 70508
Appointment Date:	8/3/2017

Officer(s)

Additional Officers: No

Officer:	LISA SMITH
Title:	Manager
Address 1:	122 JAMES COMEAUX ROAD
Address 2:	SPC
City, State, Zip:	LAYAFETTE, LA 70508

Amendments on File
No Amendments on file

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