



Private Investigators Licensing Board

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NOTICE OF HEARING FOR THE ADOPTION OF AMENDED REGULATIONS OF THE NEVADA STATE PRIVATE INVESTIGATORS LICENSING BOARD

The Nevada State Private Investigators Licensing Board will hold a public HEARING **Tuesday, May 11, 2010 at 9 a.m.**

Office of the Attorney General
100 North Carson Street
Mock Courtroom
Carson City, Nevada 89701
and via videoconference

Grant Sawyer State Office Building
555 East Washington Avenue
Suite 4500
Las Vegas, Nevada 89101

The purpose of this hearing is to receive comments from all interested persons regarding the amendment of regulations that pertain to chapter 648 of the NAC, LCB File # R-109-09 and R-009-10.

The following information is provided pursuant to NRS 233B.0603:

1. *The need for and the purpose of the proposed regulation or amendment.*
(A) To amend NAC 648 in order to carry out the functions of SB265 relating to the issuance, suspension and reinstatement of a provisional registration under certain circumstances; establishing a system for maintaining certain records of persons registered with the Private Investigator's Licensing Board; requiring a licensee to file a change of employment notice with the Board on behalf of certain licensees; establishing fees; and providing other matters properly relating thereto; (B) Provides a uniform State mandated firearm curriculum for licensees and their employees.

2. *Either the terms or the substance of the regulation to be adopted, amended, or repealed, or a description of the subjects and issues involved.*

- (A). This amendment is to clarify who requires registration and the process if a person is not already registered or provisionally registered.
(B) This regulation will revise the provisions relating to renewal of certification as a firearm instructor, revise the fee for such renewal, revise the curriculum

for a course of training and establish a maximum number of training hours per day.

3. *The estimated economic effect of the regulation on the business which it is to regulate and on the public.* The estimated economic effect of the proposed regulations to be adopted and amended on the regulated industry and the public are as follows:

A. *Estimated economic effect.* It is estimated that the proposed regulations to be adopted and amended would have a small economic effect as follows:

(i). *Adverse and beneficial effects:* The proposed amended regulations will economically benefit the industry. A-1) Brings all registrations over which the Board has jurisdiction, and at the same time allows statewide registration that will allow an individual to move around the State without having to obtain work cards in different counties. A-2) Provide a consistent and uniform criteria State wide for employees of licensees. The cost of the registration would be uniform statewide; one application statewide; and, consistent and uniform disqualifier. All work cards would be issued by one agency. B-1) Provides additional training for certified firearm instructors, a uniformed curriculum for licensees and their employees, and a maximum number of training hours per day. B-2) Increases the annual renewal from \$50.00 to \$100.00

(ii). *Immediate and long-term effects:* The proposed amended regulations will have similar immediate and long-term effects as the adverse and beneficial effects.

B. *Estimated economic effect on the public:* It is estimated that the proposed regulations to be adopted and amended will not have a negative economic effect on public.

(i). *Adverse and beneficial effects:* The proposed amended regulations do not have an adverse effect. The proposed amended regulations provide for more efficiency in the industry. A-1) All employees working under the purview of NRS 648 will be required to have a Criminal History background check. Currently there are no background checks on employees working in the industry in the some counties. A-2) Having registered employees renew once every five years allows for a checks and balances to ensure that an employee continues to be suitable for hire. This provides a protection to the general public and the industry. A-3) There is a centralized database, available to law enforcement and the industry, allowing verification and validation of an individual's registration. B-1) One standardized curriculum to be taught within the industries regulated by the Board.

(ii). *Immediate and long-term effects:* The proposed amended regulations will have similar immediate and long-term effects for the public.

4. *The estimated cost to the agency for enforcement of the proposed regulation.* The cost for implementation was included in this year's budget.

5. *A description of and citation to any regulations of other state or local governmental agencies which the proposed regulation overlaps or duplicates and a statement explaining why the duplication or overlapping is necessary. If the proposed regulation overlaps or duplicates a federal regulation, the notice must include the name of the regulating federal agency.* The proposed amended regulations do not overlap or duplicate any regulations of other state or local government agencies or of any federal agency.

6. *If the regulation is required pursuant to federal law, a citation and description of the federal law.* The proposed amended regulations are not required by federal law.

7. *If the regulation includes provisions which are more stringent than a federal regulation that regulates the same activity, a summary of such provisions.* The proposed amended regulations are not more stringent than federal regulation.

8. *Whether the proposed regulation establishes a new fee or increases an existing fee.* The proposed amended regulations to be adopted and amended do establish an increase in existing fees.

Persons wishing to comment on the proposed amendments may appear at the public hearing, or may address their comments, data, views or arguments in written form to Elaine Trent, Program Assistant, Private Investigators Licensing Board, Office of the Attorney General, 3476 Executive Point Way #14, Carson City, Nevada 89706. Written submissions must be received on or before April 23, 2010. If no person who is directly affected by the proposed action appears by the required time to make an oral presentation, the Board may proceed immediately to act upon the submissions.

Members of the public who require special accommodations or assistance must notify Elaine Trent, Program Assistant, Private Investigators Licensing Board, 3476 Executive Point Way #14, Carson City, Nevada 89706 no later than 5 working days prior to the hearing.

A copy of this notice and the regulations to be amended will be on file at the State Library, 100 Stewart Street, Carson City, Nevada, for inspection by members of the public during business hours. Additional copies of the notice and regulations to be amended will be available at the Nevada State Private Investigators Licensing Board, Office of the Attorney General, 3476 Executive Point Way #14, Carson City, Nevada 89706, and at the main public library in each of Nevada's counties except Washoe County and Clark County for inspection and copying by members of the public during business hours. This notice and the text of the proposed regulations and amendments are also available in the State of Nevada Registrar of Administrative Regulations, which is prepared and published monthly by the Legislative Counsel Bureau pursuant to NRS 233B.0653, and on the Internet at <http://www.leg.state.nv.us>. Copies of this notice and the proposed regulations will also be mailed to members of the public upon request. A reasonable fee may be charged for copies if it is deemed necessary.

Upon adoption of any regulation, the Board, if requested to do so by an interested person, either before adoption or within 30 days thereafter, will issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the

consideration urged against its adoption.

This notice of intent to act upon a regulation, notice of workshop and notice of hearing has been posted at the following locations:

Private Investigator's Licensing Board, Carson City, Nevada
Office of the Attorney General, Carson City, Nevada
Legislature Building, Carson City, Nevada
Nevada State Library, Carson City, Nevada
Washoe County Library, Reno, Nevada
Clark County Library, Las Vegas, Nevada
State of Nevada, Grant Sawyer Building, Las Vegas, Nevada

**ADOPTED REGULATION OF THE
PRIVATE INVESTIGATOR'S LICENSING BOARD**

LCB File No. R109-09

Effective January 28, 2010

EXPLANATION – Matter in *italics* is new; matter in brackets [~~omitted material~~] is material to be omitted.

AUTHORITY : §§1 and 3, sections 2 and 3 of Senate Bill No. 265, chapter 373, Statutes of Nevada 2009, at pages 1941 and 1942; §§2 and 4-6, section 2 of Senate Bill No. 265, chapter 373, Statutes of Nevada 2009, at page 1941; §§7-9, section 3 of Senate Bill No. 265, chapter 373, Statutes of Nevada 2009, at page 1942.

A REGULATION relating to private investigators; providing for the issuance, suspension and reinstatement of a provisional registration under certain circumstances; establishing a system for maintaining certain records of persons registered with the Private Investigator's Licensing Board; requiring a licensee to file a change of employment notice with the Board on behalf of certain employees; establishing fees; and providing other matters properly relating thereto.

Section 1. Chapter 648 of NAC is hereby amended by adding thereto the provisions set forth as sections 2 to 9, inclusive, of this regulation.

Sec. 2. 1. *A licensee shall not employ a person who is not provisionally registered or registered. A licensee shall immediately terminate the employment of a person if the Board notifies the licensee that the Board has denied, suspended or revoked the provisional registration or registration of the person.*

a.

2. If a person applies for employment with a licensee, the licensee or a designated employee of the licensee shall review the system of records maintained by the Board pursuant to section 5 of this regulation to determine whether the person is registered, is provisionally

registered or has had his or her registration or provisional registration denied, suspended or revoked.

3. If a licensee determines that the person is not registered or provisionally registered, and is not subject to denial, suspension or revocation, the licensee must ~~provide the person with an application for registration and a copy of the statements prescribed in subsections 1 and 2 of NRS 648.080 and must instruct the person to:~~

(a) Complete the application for registration;

(b) Obtain two complete sets of fingerprints or provide a receipt for electronic submission of fingerprints to the Board;

(c) Pay all applicable fees; and

(d) Unless otherwise instructed by the Board, submit the application for registration to the Board.

4. If a licensee determines that the provisional registration or registration of a person who applies for employment with the licensee has been denied, suspended or revoked by the Board, the licensee:

(a) Shall not accept an application for registration from the applicant; and

(b) Shall notify the applicant that he or she must contact the Board to obtain information concerning the denial, suspension or revocation.

5. If a licensee determines that a person who applies for employment with the licensee is provisionally registered or registered with the Board, the licensee shall provide such information to the Board not less than 5 business days after the licensee makes the determination.

6. *Each licensee must maintain a passport-size photo of each person employed by the licensee. The licensee shall retain the photo for not less than 5 years after the last date on which the person is employed by the licensee. The photo may be in the form of a photograph or may be digitally stored, but the photo must be capable of being reproduced and available at the request of the Board.*

7. *Any person who violates the provisions of this section is subject to disciplinary action by the Board.*

8. *A licensee shall maintain written documentation establishing that the licensee received an application from each applicant for employment before accessing the Internet website established pursuant to section 5 of this regulation for at least 4 years after the date of receipt of the application.*

Sec. 3. 1. *The Board will review each application for registration for completeness.*

2. *The Board will conduct an investigation of the applicant to determine whether the applicant is eligible to be or continue to be an employee of a person licensed pursuant to chapter 648 of NRS.*

3. *The Board may deny an application for registration within 90 days after receipt of the complete application for any reasonable cause.*

4. *The Board will deny an application for registration if the applicant has been convicted of a felony or a crime involving moral turpitude or the illegal use or possession of a dangerous weapon.*

5. *If the Board denies an application for registration, the Board shall provide notice of the denial to the applicant and the applicant's employer. The notice to the applicant must include notice of the right of the applicant to appeal the decision to the Board.*

6. *If the Board denies an application, the applicant may appeal the denial by filing a request for appeal with the Board not later than 30 days after the applicant receives notice of the denial. If the applicant does not request an appeal, the decision of the Board to deny the application is deemed final.*

7. *If the Board approves the registration of an applicant, the applicant is eligible for employment with any person licensed pursuant to chapter 648 of NRS unless the applicant's registration expires, is suspended or is revoked.*

Sec. 4. *An application for registration is confidential. A licensee or any employee of a licensee shall not access or use any information contained in the application for any purpose unless:*

1. *The applicant provides written consent to the licensee; or*
2. *Otherwise permitted by law.*

Sec. 5. 1. *The Board will establish and maintain an Internet website that contains a system of records which:*

(a) Contains information regarding each person who is registered with the Board, including, without limitation, the contact information of the licensee who employs the person; and

(b) Identifies each person whose registration is expired, is denied by the Board, or is otherwise suspended or revoked.

2. *The portion of the Internet website that contains the system of records may only be accessed in the manner authorized by this section and section 2 of this regulation.*

3. *Before a licensee grants any employee access to the portion of the Internet website that contains the system of records maintained by the Board, the licensee shall provide the Board with the name, social security number and date of birth of the employee.*

4. *Upon the termination of employment of the employee or the reassignment of the employee to a position that no longer requires the employee to access the portion of the Internet website that contains the system of records, the licensee shall immediately notify the Board of the termination or reassignment.*

5. *Except as otherwise provided in this section and section 2 of this regulation, the information contained in the system of records is confidential and must not be disclosed by any licensee or employee of a licensee.*

Sec. 6. 1. *If a person who is registered becomes employed by another or additional licensee, the new employer shall file a change of employment notice with the Board by entering the information required by the Board into the system of records contained on the Internet website established pursuant to section 5 of this regulation not later than 5 business days after the employee becomes employed with the new employer.*

2. *A person is deemed provisionally registered as an employee upon the filing of a change of employment notice in accordance with subsection 1. The provisional registration is valid for 90 days after the provisional registration is issued by the Board, unless the Board denies, suspends or revokes the provisional registration.*

3. *The filing of the change of employment notice does not affect the date on which the registration of the employee expires.*

Sec. 7. 1. *The Board may suspend a provisional registration issued pursuant to section 2 of Senate Bill No. 265, chapter 373, Statutes of Nevada 2009, at page 1941, if the Board determines that:*

- (a) The application for the provisional registration is not complete; or*
- (b) The fingerprints submitted by the applicant are illegible or unclassifiable.*

2. *If the Board suspends a provisional registration pursuant to subsection 1, the Board shall notify the applicant and his or her employer of the suspension. The applicant shall not work as an employee of a person who is licensed pursuant to chapter 648 of NRS until the Board reinstates the provisional registration.*

3. *If the Board reinstates the provisional registration of the applicant, the period during which the provisional registration was suspended pursuant to this section must not be included in the 90 days during which the Board may deny the provisional registration pursuant to section 3 of this regulation.*

Sec. 8. 1. *An applicant whose registration has been denied, suspended or revoked by the Board may not reapply for registration earlier than 1 year after the date of the final decision of the Board to deny, suspend or revoke the registration of the applicant.*

2. *An applicant whose registration has been denied, suspended or revoked by the Board on two or more occasions may not reapply for registration earlier than 5 years after the date of the most recent decision of the Board to deny, suspend or revoke the registration of the applicant.*

Sec. 9. 1. *The Board will charge and collect the following fees for registration with the Board:*

- (a) If the applicant submits to the Board two fingerprint cards, \$95; or*

(b) If the applicant submits to the Board a receipt for electronic submission of the fingerprint cards, \$85.

2. Each applicant must submit the fee required by subsection 1 with the application for registration.

3. The fee required by this section is in addition to any other fee required by law.

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ATTORNEY GENERAL
PRIVATE INVESTIGATORS BOARD

**PROPOSED REGULATION OF THE
PRIVATE INVESTIGATOR'S LICENSING BOARD**

LCB File No. R009-10

February 2, 2010

EXPLANATION - Matter in *italics* is new; matter in brackets [~~omitted material~~] is material to be omitted.

AUTHORITY: §1, NRS 648.030 and 648.120; §§2-5, NRS 648.030.

A REGULATION relating to firearm safety; revising provisions relating to renewal of certification as a firearms instructor; revising the fee for such renewal; revising the curriculum for a course of training in firearms safety; establishing a maximum number of training hours per day; and providing other matters properly relating thereto.

Section 1. NAC 648.345 is hereby amended to read as follows:

648.345 1. A licensee or an employee of a licensee for whom a registration fee is paid pursuant to NAC 648.340 may not carry any firearm while performing the duties for the type of business for which he is licensed or employed unless he:

(a) Is certified by the Board as a firearms instructor pursuant to subsection 2;

(b) *Has successfully completed and received certification from a course of training approved by the Board in carrying, handling and using firearms safely; or*

(c) Has been actively employed as a peace officer and is certified by the Board pursuant to subsection 5.

2. The Board may certify a person who meets the requirements of subsection 1 of NRS 648.110 as a firearms instructor in carrying, handling and using firearms safely if the applicant:

(a) Is at least 21 years of age;

(b) Has not been convicted of a felony or any crime involving the illegal use or possession of a firearm; and

(c) Submits a completed application with proof satisfactory to the Board of his qualifications and experience and pays a fee of \$100. The application must include:

(1) A detailed statement of the applicant's qualifications and experience in carrying, handling and using firearms;

(2) A detailed statement of the applicant's qualifications and experience in providing instruction to other persons in carrying, handling and using firearms safely; and

(3) Evidence of the applicant's successful completion of at least 40 hours of training on the instruction of peace officers or security officers in carrying, handling and using firearms safely.

3. To renew his certification as a firearms instructor, the applicant must:

(a) Submit his application for renewal to the Board on or before July 1 next following the date the certificate was issued or last renewed;

(b) Submit proof satisfactory to the Board of the completion of at least ~~{4}~~ 12 hours of education or training on ~~{teaching a course of training}~~ subjects described in NAC 648.346 ~~{,}~~ *within the previous 24 months;* and

(c) Pay a fee to the Board of ~~{\$50-}~~ \$100.

4. As evidence of a person's certification as a firearms instructor or renewal thereof, the Board will issue to the person a card which is sequentially numbered and of a size to be carried in a wallet. The card will contain the date of its issuance and expiration.

5. The Board may certify a licensee or employee who has been employed as a peace officer if he submits a completed application to the Board that is accompanied by:

(a) Proof satisfactory to the Board that the applicant was employed as a peace officer, as defined in NRS 169.125, for at least 10 years, and was employed as a peace officer during the 5 years immediately preceding the date of the application;

(b) A statement of the training and experience the applicant obtained in the use of firearms while employed as a peace officer;

(c) Proof satisfactory to the Board of the applicant's qualification through a course of fire within the 3 months immediately preceding the date of the application; and

(d) An application fee of \$10.

↪ In addition to the application fee, the applicant must pay a fee of \$10 for a card issued pursuant to NAC 648.350.

Sec. 2. NAC 648.346 is hereby amended to read as follows:

648.346 1. The *minimum* curriculum for a course of training in carrying, handling and using firearms safely that is taught for the purposes of NRS 648.030 must include instruction designed to teach:

(a) The legal ~~[, moral and ethical]~~ *and civil* responsibilities of carrying, handling and using a firearm, including:

(1) The applicable federal and state laws and regulations and local governmental ordinances related to carrying, handling and using firearms and the use of deadly force.

(2) The civil and criminal liability related to carrying, handling and using firearms and the use of deadly force.

(3) The consequences and risks related to carrying, handling and using firearms and the use of deadly force.

(4) The elements of self-defense, using a weapon in self-defense ~~[, techniques for retaining weapons]~~ and the use of force.

(5) Recent court decisions related to carrying, handling and using firearms and the use of deadly force.

(b) The terminology related to and the maintenance of different types of firearms and their related systems, including:

(1) The operational and mechanical systems and parts of a firearm and the related terminology.

(2) The types of ammunition and their ballistic ~~{data}~~ *properties* and effective uses.

(3) The inspection, storage and general care of ammunition.

(4) The inspection, care, cleaning and maintenance of a firearm.

(c) Carrying, handling and using a firearm safely, including:

(1) The safe handling, use and storage of firearms when off duty.

(2) The safe transportation of a firearm.

(3) The appropriate methods of safely carrying a firearm while on duty.

(4) Safety and accessory equipment available to carry, handle and use a firearm safely.

(d) The fundamentals of ~~[proper]~~ *safe* handling and shooting of firearms, including:

(1) The fundamentals of operating a handgun.

(2) The general differences among handguns.

(3) The proper procedures and devices for loading, unloading and reloading a firearm.

(4) The fundamentals of shooting, such as the use of sights, sight picture and alignment, control of the trigger, breathing and firing in a single or double action.

(5) Proper techniques for gripping a handgun and shooting positions.

(6) Procedures for drawing and reholstering a firearm ~~{-}~~ *and techniques for retaining a firearm.*

(7) The correct positions for shooting when standing, kneeling, sitting or prone.

(8) The use of barricades or other forms of cover and alternate shooting positions.

(e) The preparation for shooting at a firing range, including:

(1) The location of the range.

(2) The equipment to be used at the range.

(3) The course of fire.

(4) Targets to be used.

(5) Commands at the range.

(6) Safety and etiquette at the range.

(f) Exercises to be used at a firing range and the practical use of a firearm at the firing range, including:

~~(1) The review of safety procedures and etiquette at the firing range and a safety~~
inspection of all firearms, holsters and accessories.

(2) Practicing drawing and holstering.

(3) Dry firing, the manipulation of the trigger and follow through.

(4) The procedures for loading, unloading and reloading.

(5) Exercises for firing with live ammunition to practice proper shooting techniques while firing at targets with a firearm of the same type and caliber as the firearm the person will use while on duty.

(6) Qualifying with a course of fire established by the instructor, using a firearm of the same type and caliber as the firearm the person will use while on duty. The course of fire must require firing at least 30 rounds of live ammunition with a passing score of 75 percent, and must include shooting 10 rounds of ammunition from a distance of 3 yards in 30 seconds, 10 rounds of ammunition from a distance of 7 yards in 30 seconds and 10 rounds of ammunition from a distance of 15 yards in 30 seconds ~~+~~ *on a full-size B27-type target.*

2. The course must consist of:

(a) Eight hours of training and instruction on carrying, handling and using a firearm safely, including the completion of a written examination with a passing score of 75 percent. The examination must consist of questions with answers that are true or false, multiple choice or fill in the blank.

(b) ~~Three~~ *Five* hours of instruction and training on a firing range during which each person must qualify using a firearm of the same type and caliber as the firearm the person will use while on duty.

3. *The course must be completed within a period of 7 days. Each day of the course must consist of a number of contact hours of training. Not more than 9 contact hours of training may occur on any day.*

4. *As used in this section, "contact hour" means 50 minutes of instruction in a period of 60 minutes.*

Sec. 3. NAC 648.348 is hereby amended to read as follows:

648.348 1. A person who is certified as a firearms instructor by the Board shall not conduct a course of training in carrying, handling and using firearms safely for the purposes of NRS 648.030 unless the course ~~has been approved by the Board. Each application for such approval must be submitted to the Board in writing, at least 30 days before the meeting at which the application is to be considered, and contain:~~

- ~~—(a) A detailed outline of the course;~~
- ~~—(b) A lesson plan containing a narrative description of the specific instruction to be provided concerning the subject matter specified in the outline of the course;~~
- ~~—(c) A description of the course of fire to be used for qualification;~~
- ~~—(d) A copy of the written examination for the course with corresponding answers; and~~
- ~~—(e) The name of the instructor who will be teaching the course.~~

~~2. The Board's approval of the outline, lesson plan, course of fire and examination is effective until the Board notifies the person conducting the course in writing that the approval has been withdrawn. No change may be made in an approved outline, lesson plan, course of fire or examination without the Board's approval of the proposed change. } follows the curriculum established in NAC 648.346.~~

2. A person who fails to comply with subsection 1 is subject to disciplinary action.

Sec. 4. NAC 648.350 is hereby amended to read as follows:

648.350 1. To certify a person's successful completion of the course of training in carrying, handling and using firearms safely, and his successful qualification with a firearm, a firearms instructor shall issue to the person a card furnished by the Board for that purpose. The

card will be sequentially numbered and of a size to be carried in a wallet. The firearms instructor shall state on:

(a) The front of the card its date of issuance and expiration.

(b) The back of the card the date of the person's qualification and the instructor's verification of that qualification.

2. The certification card is valid for 5 years if the licensee or employee successfully qualifies every 6 months on a course of fire that is given by a certified firearms instructor and is approved by the Board. The licensee or employee must fire at least 30 rounds of ammunition with a score of at least 75 percent. If the licensee or employee fails to qualify every 6 months, the card becomes invalid and the licensee or employee shall not use a firearm in the course of his employment until he successfully qualifies.

3. If a licensee or employee fails to qualify for at least 2 successive 6-month periods or his certification card expires, he may be recertified if he presents proof satisfactory to the Board of his completion of at least 4 hours of additional training in the legal ~~[, moral and ethical]~~ *and civil* responsibilities of carrying, handling and using a firearm as set forth in paragraph (a) of subsection 1 of NAC 648.346.

4. ~~*If a licensee or employee is also a firearm instructor who has been certified by the Board, he must qualify annually and present proof of qualification to the Board at the time of recertification.*~~

5. To cover the Board's administrative costs related to the certification and qualification of a person by a certified firearms instructor, the instructor shall remit to the Board \$1 for each certification card issued by the instructor pursuant to this section.

~~{5}~~ 6. The person to whom the certification card is issued shall:

- (a) Have it in his possession while carrying a firearm in the performance of his duties; and
- (b) Produce it upon the request of any peace officer or a representative of the Board.

Sec. 5. NAC 648.347 is hereby repealed.

TEXT OF REPEALED SECTION

648.347 Course of training: Time requirement for each subject. (NRS 648.030)

The following subjects must be taught in a course of training in carrying, handling and using firearms safely for the listed length of time:

- 1. The legal, moral and ethical responsibilities of carrying, handling and using a firearm, for 2 hours.
- 2. The terminology related to and the maintenance of different types of firearms and their related systems, for 1 hour.
- 3. Carrying, handling and using a firearm safely, for 1 1/2 hours.
- 4. The handling of a firearm and the fundamentals of shooting, for 1 1/2 hours.
- 5. Preparation for practical training at the firing range and safety and etiquette at the firing range, for 1 hour.

6. Practical training at the firing range, for 3 hours.

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