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March 13, 2000



Secretary  
FEDERAL TRADE COMMISSION  
Room H-159, 600 Pennsylvania Avenue, NW  
Washington, DC 20580

**RE: GRAMM-LEACH-BLILEY ACT PRIVACY RULE,  
16 CFR PART 313 - Comment**

To Whom It May Concern:

As a licensed private investigator in the State of Tennessee, I am writing to express my concern with the proposed interpretation of regulations to implement Title V of the Gramm-Leach-Bililey Act of 1999. Through the years, I have witnessed more and more legislation which has tied the hands of people who are trained and sworn to uphold the law, both civilly and criminally. Much of the new legislation invariably benefits the wrongdoer while throwing roadblocks in the way of trained professionals who are seeking these persons for various legitimate reasons wherein the person's location is a necessity. This includes service of process for non-payment of obligations including child support, student loans, bad debts, etc. It seems that every time a legislator comes up with a "new law" it benefits the lawbreaker. This also includes the post offices refusal to provide forwarding address information to police officers, attorneys, process servers, etc. who have a legitimate need to locate someone and now must obtain a court order even when providing identification.

While I respect the fact that there is a need for privacy as it concerns the ordinary citizen, there is no reason to impede the legal system by overdoing these laws. I agree that in most cases, no one should be privy to a person's private financial situation; however, I do not agree that "privacy" means aiding a person to not be found at all. Most states require that private investigators have training before they obtain their licenses which should enable them to obtain information necessary in the course of a matter where vital witnesses are needed as well as people avoiding detection for illegal reasons. Everyone knows that a law breaker, whether civilly or criminally, likes nothing better to disappear into a system where no one can locate them even though a citizen should have every legal right to locate that person when they are being sought for a legitimate reason.

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A name, address and telephone number should not be classified as non-public, especially where it is necessary to locate someone who uses these type of laws to thwart the system. Only wrongdoers and criminals are going to benefit from any interpretation in the law which allows people to "disappear into the woodwork" and continue to go about their business in other places, and, in most cases, continue in whatever activity caused them to be sought in the first place. They continue to commit fraud, run up bad debts, etc. and then move away, leaving information behind which would enable them to be found but is impossible to obtain due to the government blindly assisting them in their fraudulent behavior. In some cases, the person is being sought for a reason beneficial to him or her.

In any event, please take this letter as a request to allow the law abiding citizen who needs addresses, telephone numbers and places of employment for the purpose of serving process, aiding law enforcement officials in an arrest or seeking a necessary witness to be located to be able to do so.

Yours very truly,



Vivian G. Bumgardner  
Manager/Tennessee

/jj