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An Assessment of the Preparedness of Large Retail Malls to Prevent and Respond to Terrorist Attack

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INTRODUCTION

Since the events of September 11, 2001, security concerns have figured prominently in the national agenda. Government officials and the public now recognize a wider array of potential terrorist targets extending beyond military installations. These “soft targets”, or areas with public access, include transit hubs, schools, and mass private spaces like amusement parks and sports arenas.

One type of soft target that has received too little attention is the retail mall. With all the other soft targets that exist (e.g., transit systems, schools, hospitals, etc.), why should citizens be concerned about attacks against shopping malls? One reason is that the nature of malls makes them very vulnerable: there are multiple entrances and exits, and they are open to the public. Large numbers of people come and go, making it easy for potential terrorists to blend in unnoticed. Many of the visitors carry large parcels that could hide a bomb or other weapon. There are multiple ways to attack a mall, ranging from automatic weapons to car bombs to bombs placed inside the mall, even to an attack using a biological or chemical agent.

Moreover, the consequences of an attack could be quite serious. In the case of an attack using a biological or chemical agent, or a bomb blast resulting in structural collapse, the casualties could be very high. An attack could also produce insurance and job losses. A coordinated series of attacks against malls would almost certainly result in long-term lost business and serious regional or national economic consequences, as we saw in the airline industry following 9/11.

In fact, malls and the retail sector in general have been attacked in various parts of the world for the past several decades. Israel has experienced or thwarted attacks against malls on ten occasions since the start of the Intifada in the West Bank in the mid-1990s. Countries as disparate as Turkey and Finland have had attacks against malls in recent years. England suffered attacks against retail stores by the Irish Republican Army as far back as the 1970s.¹

In the United States, malls have been targeted as well. Just a few weeks prior to the drafting of this report, a man walked into a mall in Tacoma, Washington, and opened fire with a pair of assault rifles. After shooting six people, one of them critically, the gunman ducked into a music store and took four hostages. After his surrender to authorities, the police searched his car and apartment and found a recipe for making the deadly poison ricin as well as bomb-making plans and materials. The gunman told authorities that he had been humiliated during a troubled childhood and that recent problems made him want to be “heard.”²

Last year, the FBI arrested a man on charges that he intended to blow up a Columbus, Ohio, shopping center. The man, a Somali immigrant who allegedly traveled to Ethiopia to obtain terrorist training, was a friend of a man convicted of conspiring to blow up the Brooklyn Bridge. The Columbus suspect is awaiting trial in federal court.

This report takes a close look at the state of security in large U.S. shopping malls. How have things changed since 9/11, and is the state of security today meeting the standards that the industry, government, and courts have defined?

Private Security in a Post-9/11 World

For the most part, malls and other soft targets that are part of our homeland security concerns are protected, not by public police, but by private security. Thus, the events of 9/11 thrust private security officers into a new and important role. Recognizing this reality, several states—including California, Illinois, and Michigan—took steps to more closely regulate the industry in the year following 9/11/2001.³

How has the industry itself responded to the increased responsibility? Media reports after 9/11 suggested that little had changed. An early 2003 *USA Today* story characterized private security as “homeland defense’s weak link.”⁴ Although a few states had introduced or raised hiring or training standards, the *USA Today* story showed that most states still do not impose minimum training standards or even require background checks. Moreover, even in states that did require training programs, there was little effort to monitor the content or quality of the programs.

Several newspaper articles and limited surveys have reinforced the notion that security in the retail sector did not undergo significant change after 9/11. A 2003 survey by the Council on Competitiveness of 230 corporate executives from companies with gross revenues of \$50 million or more found that only half of the executives had made changes to security in response to terrorism concerns.⁵ A survey conducted in three large states for the Service Employees International Union similarly found that four in ten officers reported no new security measures at their workplaces. Seven in ten of the officers reported that bomb threat drills or natural disaster drills were never conducted at their buildings.⁶

New Standards for Industry Responsibility

Recognizing the importance of security in the retail sector, the 9/11 Commission determined that businesses have a “duty to care” about the security of their customers. The Commission endorsed the National Fire Prevention Association standard (NFPA 1600) for disaster and emergency management preparedness in the private sector. According to the Commission, “We believe that compliance with the standard should define the standard of care owed by a company to its employees and the public for legal purposes.”⁷

The NFPA 1600 standard specifies that emergency management programs should address the four phases of emergency management and recovery, which include: (a) *mitigation*, or efforts to eliminate or reduce the risk of a disaster or emergency, (b) *preparedness*, or activities and programs intended to support recovery from disaster, (c) *response*, or activities to address immediate and short-term effects of a disaster, and (d) *recovery*, or activities and programs designed to return conditions to normal

The NFPA standard lists a number of elements that companies ought to adopt in order to effectively implement the four phases of emergency management and recovery. Included among those elements are:

- *Risk assessment*—Identification of potential hazards and the likelihood of their occurrence
- *Hazard mitigation*—Based on the results of the risk assessment, efforts to minimize likely hazards
- *Emergency response plan*—Assignment of responsibilities to organizations and individuals for carrying out specific actions during an emergency or disaster
- *Emergency communication protocols*—Determining communication needs and capabilities of various organizations and personnel and ensuring interoperability
- *Training of staff in emergency procedures*—Education of staff on the elements of the emergency management program and periodic testing and exercises
- *Mutual aid*—Agreements with other entities for their participation in emergency response plans

Court decisions have reinforced the responsibility of the private sector to take reasonable steps to guard against terrorist attack. A New York district court ruling in 2003 denied a motion to dismiss a suit against the airlines by families of the 9/11 victims. The judge's ruling was based on the concept that it was foreseeable that a plane whose passengers have been negligently screened at check-in could be subject to terrorist attack. In another recent ruling, a New York State jury found that the agency that owned the World Trade Center was negligent for not doing enough to thwart the deadly 1993 terrorist bombing beneath the twin towers, a ruling that may open the door to more litigation. In fact, the jurors found that the Port Authority was actually twice as liable for the bombing as the actual terrorists! Jurors said they were swayed by a 1985 report written by the Port Authority's own security officials, who warned that the underground parking garage was a likely attack site.

Purposes and Methods

The Police Foundation, in cooperation with the Vera Institute of Justice, the ASIS International Foundation, and the Midwest Research Institute, in cooperation with researchers at the University of Eastern Kentucky and Carlton University undertook an assessment of the level of security in large enclosed shopping malls as well as the associated issues of training and legislation of private security forces. The core issue we address in this report is the degree to which malls have become better prepared to respond to terrorist attacks in the aftermath of 9/11.

The investigation we conducted went well beyond earlier surveys conducted after 9/11. It included surveys with 33 state homeland security advisors to get their views on mall preparedness as well as surveys with 120 security directors of the nation's largest indoor retail malls. We conducted site visits to eight U.S. malls and two Israeli malls to gain greater insight into how they are dealing with security preparedness and response to disasters. We conducted a state-by-state analysis of legislation regulating the hiring and training of private security.

The detailed assessment indicates what malls are doing in the areas of risk assessments, preventive measures, emergency preparedness plans, training, and coordination with state and local government. The comprehensive picture that emerges of the state of security in large retail malls suggests that (a) there are significant gaps in preparedness, (b) there are relatively inexpensive steps that can be taken to fill those gaps, and (c) state homeland security officials and local police as well as mall owners and have a role to play in filling those gaps.

FINDINGS

Spending on Security

Results of the security director survey indicated that just 16% of malls had increased security expenditures beyond the rate of inflation after 9/11/2001. Our site visits as well indicated that malls have not made any significant investment in increased security since then. With the exception of sites that received federal dollars through the Buffer Zone Protection Program (BZPP), a federal program to provide funds for protecting critical infrastructure, we did not observe in our site visits any increases in spending beyond inflation over the past four years. (In fact, one mall had dramatically cut its security budget.) The private sector generally has not invested in improving security to cope with emergency situations such as a terrorist attack or to protect against petty crimes committed in malls.

State governments have done little financially to enhance mall security. Of the 33 states responding to the state homeland security advisor survey, just five said they had provided funds for improved mall security, and these were likely referring to the Buffer Zone Protection Program. In fact, the BZPP was the only significant source of funding for upgrading security that we observed during site visits. Access to BZPP funds appeared largely to be a function of the priorities of each state's homeland security advisor. We observed that, in sites that had received BZPP funds, local law enforcement, working with the state homeland security offices, took the initiative by contacting area malls to conduct a risk assessment. Other states appeared not to place malls high on their priority lists to receive BZPP

funds.⁸ One mall owner eager to participate in the BZPP had been unable to initiate a risk assessment in two states, the first step in getting BZPP funds.

Risk Assessment

Risk assessments, when conducted, have largely been driven by the BZPP application process. This procedure, codified by the Department of Homeland Security (DHS) and generally implemented by state or local homeland security officials, is quasi-quantitative and employs standard risk assessment techniques developed by the military. It determines probabilities and potential losses for various types of hazards occurring at specific locations within facilities. In five of the eight U.S. malls visited, a risk assessment had been conducted at the instigation of the state homeland security advisor. (Following the assessment, four of the five malls had been designated as BZPP sites, one had not.) The risk assessment at one mall determined that the major risk in terms of serious impact to lives and property would be a bomb blast in the mall's food court. Such a blast, it was determined, would produce the most casualties and potentially harm the structural integrity of that part of the mall. This knowledge was incorporated into exercises for security staff.

The three malls not considered for BZPP status had not undertaken risk assessments on their own, even on an informal basis. In two cases, malls simply were not at the top of the list of local critical sites. In one, the security director told us that local law enforcement had offered to conduct a risk assessment, but that mall owners had declined, worried about potential liability if they failed to implement precautionary measures following a risk assessment. Without undergoing some form of risk assessment process, it is difficult for mall managers to arrive at an understanding about what should be protected and which strategies should be employed for prevention of specific assets.

Prevention Strategies

The most common technological strategies used were closed-circuit television (CCTV) systems and bollards (barriers) to block attacks by cars. Surveillance cameras were used by half of the malls responding to the security director survey, and passive barriers by three in ten malls. The systems we observed on site visits varied in sophistication: some were monitored in real time, while others recorded events for security staff to review after an event occurred. One mall we visited had installed bollards to protect against the possibility of a car bomb being detonated in the interior of the mall. Several other security directors interviewed during site visits said that bollards would be a good idea, but that their company did not have plans to implement them.

In the written survey, 56% of security directors said that, since 9/11, they had developed plans to keep potential wrongdoers from breaching sensitive areas of the mall. Most malls we visited had policies designed to monitor and restrict deliveries to stores. Delivery trucks were checked coming in, and nonroutine deliveries were checked out before allowing the drivers to proceed. A few malls restricted deliveries to off-hours when stores were closed or the mall was less populated. Other security directors said that they would move to such a plan if the national alert level went up or if a specific threat against the mall was uncovered.

Just under half (49%) of security directors responding to the written survey reported that they had instructed their staff to be on the lookout for unusual behavior or dress of mall clients. The site visits confirmed that policies dictated that security staff profile mall visitors based not on ethnicity but on dress or aberrant behavior. For example, a common policy was to prohibit photography and large group gatherings. Other types of behavioral profiling were less well-defined and covered characteristics such as obvious bulges under clothing, carrying large backpacks, wearing heavy coats, unwilling to make eye contact, frequenting the same area of the mall repeatedly, or sitting in one place too long.

Training Programs

Just over half of the security directors responding to the mail survey reported that their staff received some form of terrorism training. All of the malls we observed on site visits had some form of training on terrorism issues for security staff. Nonetheless, we encountered a wide range of training programs. Some malls that had contracted with a national security firm had generic company programs, some had training programs developed by state government, and some used the program promulgated by DHS. In the case of contracted mall security, training is often viewed as a key competitive advantage of one contractor over another, and it was marketed as such.

The format of terrorism preparedness training programs varied. Most consisted of a classroom format, usually four hours in length. Some were taught by outside experts and others by mall security directors trained by experts. One mall had a “text-based” approach, where security staff was required to learn from printed materials and then take a test to indicate mastery. Content also appeared to vary, but mostly focused on identifying potential terrorists; spotting suspicious packages; and responding to an attack, which included securing the scene and working with first responders. Malls generally did not have ways to evaluate whether information imparted in terrorist training programs was retained over a long period of time or affected the way security staff approached their jobs. Nearly two in three (62%) security directors responding to the mail survey believed that their antiterrorism training was inadequate; among those who felt that improvement was needed, the most common wish was for more hours of training on terrorism issues.

The long-term utility of training was hurt by the high rate of turnover among mall security staff: Most security directors said that they experienced 100% turnover within a year. The effect of the high turnover is that, at any given time, the security staff includes a good number of new recruits who are inexperienced and have not received anything beyond basic company training.

Emergency Response Plans

Three in four (73%) security directors responding to the written survey reported that they had developed written protocols for security staff to follow in the event of a disaster. The site visits revealed that typical protocols following a threat to the mall included limiting access to critical areas of the mall, increasing security staff presence, and keeping a closer eye on parking lots and mall entrances. Written emergency procedures also covered evacuations (in the event of fire, gas-leak, or suspected bomb), emergency communications, small-arms attacks, and basic first-aid and triage, as well as the normal procedures for handling lost children, misplaced property, and so forth. Protocol for most malls in the event of an attack called for contacting emergency services, contacting designated emergency management staff in the mall (the mall owner, security director), providing first aid for any injuries, and evacuating people and/or sealing off an area of the mall. Some plans were more specific, including having security staff meet at designated locations, setting up first aid and command areas, or evacuating through specific routes.

The site visits revealed serious shortcomings in emergency management planning. None of the malls we visited had developed ways to coordinate with first responders in the event of an emergency. The only means of communicating with first responders was by phone. The general plan in all cases was that, once first responders arrived on the scene, they would take charge, and mall staff would follow any instructions they were issued by police or fire officials. In none of the malls we visited was it clear who would be responsible for briefing first responders or how mall security evacuation plans would be coordinated with law enforcement needs to retain and interview eyewitnesses. One law enforcement official was blunt in his assessment: “We don’t take mall security into account. They are poorly trained and not professional.”

An emergency response plan must be well understood by staff in order to be effective. We do not know from our visits the extent to which security staff had internalized these plans, but it was not encouraging that only a couple of the malls we observed conducted drills to rehearse response to emergencies. In one, the rehearsals were limited to

finding simulated bombs and taking appropriate action. In the other, exercises also included a simulated response to a bomb detonation and was quite sophisticated, including evacuating people, setting up triage and press areas, and designating a helicopter landing area.

The most significant gap in emergency preparedness was the lack of coordination between mall security and the security staff of the large mall anchor stores. In one mall we visited, security could communicate with tenants by radio; but in all other malls, the sole means of communication between mall security and tenants was by phone. In only one mall were tenants involved in the mall's emergency response plans. Rather, the decision to evacuate anchor stores and the responsibility to oversee the evacuation was up to store security or store management. In several malls, security directors explicitly told us that relations with security staff in anchor stores were minimal or, in one case, even hostile.

Relationship With Local Law Enforcement and State Homeland Security

We encountered a good deal of variation in the degree to which local law enforcement and regional terrorism task forces have been involved in mall security. Many malls seemed to have a good relationship with local law enforcement. Seventy-eight percent of security directors responding to the written survey reported that local law enforcement shared intelligence information with them, at least on occasion, and just over a third of respondents said that their relations with law enforcement had become closer since 9/11. The site visits revealed that good ties to local law enforcement were driven by state homeland security plans that included malls in risk assessments of critical infrastructure; by mall security directors drawn from the ranks of the local police; or by the presence of police officers stationed in the mall.

There was little cooperation, however, in rehearsing response to emergencies. Just 30% of security directors responding to the written survey said that they had rehearsed emergency protocols with local law enforcement. In the eight site visits, we did not find *any* malls that conducted joint exercises with local first responders and/or law enforcement. There seemed to be two reasons for this: sometimes local law enforcement did not consider malls a top-priority target and had made a decision to expend efforts on other types of facilities. But more often, it was the malls that resisted because they could not find a convenient time or did not want to alarm the public. This situation represents a large disconnect in response to emergencies: Most mall security directors have conceptualized their staff's role as an initial "triage" force that will rapidly hand off responsibility to first responders, yet they have not actually practiced this hand-off in a joint exercise.

Just 3% of security directors surveyed said that their state homeland security advisors were very involved with security at their malls, while 78% said that their state advisors were not at all involved. By a large majority (63%), mall security officials would welcome greater involvement of their state DHS and/or law enforcement officials in security planning. Survey respondents felt that public officials could assist them by greater sharing of key intelligence (40%), by conducting risk assessments or developing emergency management plans (33%), or helping to train security officers (27%).

Assessment

We did not encounter any active programs to evaluate what guards derived from terrorism training, or if terrorism prevention and response was actually incorporated into daily work routines. Similarly, we did not observe in any malls standards for evaluating whether their preparedness plans or their response to a simulated emergency were adequate. (Of course, this point is largely moot since few malls conduct emergency preparedness exercises.) Without tabletop and live exercises, and with no clear standards for evaluation, it is impossible to say how well staff would respond in the event of a disaster.

The Special Case of Israeli Malls

In addition to eight U.S. malls, we also visited two Israeli malls to understand their strategies against terrorism. In ten attacks mounted against Israeli malls since the Intifada, not a single attacker has succeeded in penetrating the interior of the mall. While present security concerns in U.S. malls do not approach the level of imminent threat in Israeli malls, there are nonetheless lessons that can be learned from their success.

We learned that, in Israel, security plans envisage the mall at the center of three concentric circles. In the outermost circle are roving patrols of one or two security officers and vehicle inspection points, with bollards and retractable barriers used to keep vehicles from being driven through the checkpoints. All vehicles entering mall parking areas are searched and drivers are assertively questioned by security officers. The mall's entrances are considered the second circle. As they enter, all pedestrians are subjected to a search of bags, both physical and x-ray searches, and to scanning by a metal detector. Screenings are conducted by relatively low-paid, unarmed security staff, but they are monitored by a highly trained guard armed with a submachine gun. Inside the mall (the innermost security circle), just one or two armed security officers patrol and observe visitors.

According to one of the Israel mall security directors, approximately 40% of their operational budget is devoted to security, compared to 3% to 5% in the United States. The high cost of security is largely driven by government standards regarding security guard staffing levels, vehicle check points, and barricades. All national standards must be met in order for malls to keep their operating licenses.

In Israel, mall security represents a close partnership of private and public sectors. The district police license all armed and unarmed security candidates, conduct frequent on-site inspections, and observe many of the drills being conducted by the mall security staff. Joint exercises pair mall security in drills with police, fire, and medical first responders. Mall security and local law enforcement share interoperable communication systems allowing communication over a shared radio band.

Israeli malls are required under governmental regulations to conduct periodic risk assessments using independent contractors. Once the plan is completed, it is handed over to the district police for approval. Both malls we visited had comprehensive emergency response plans for various contingencies, also required by the government. Each security officer is given a duty under the plan, and a subset of officers is assigned to an emergency response team. Plans include preventing outsiders from gaining access to the mall as well as possible evacuation—a decision that, unlike what we observed in U.S. malls, is entirely up to the security director. An immediate reaction squad meets in a special control room to monitor and direct security actions until the police arrive.

Malls provide monthly training for all officers, almost entirely focused on recognizing and responding to terror threats. According to the security officers we talked with, the malls usually conduct about 50 drills per month. The drills range from minor procedural drills to covert drills during which false bombs are planted and attempts are made to bring them into the mall.

CONCLUSIONS AND RECOMMENDATIONS

Our assessment found that malls have taken some steps to improve security. Most security personnel now get several hours of antiterrorism training. Although half of the mall security directors answering the survey nonetheless felt that their staff could use more training, it is a step in the right direction. Similarly, a large majority of mall security directors say they have emergency management plans to define actions that security staff should take in the event of a disaster.

Yet, our surveys and site visits found that, outside of Buffer Zone Protection Program grants, very little money is being spent to upgrade security. Only a few states have changed their statutes to require background checks, minimum hiring standards or training, and few malls have upgraded hiring standards of their own accord. Risk

assessments are rare and, when they have been performed, are instigated by the Buffer Zone Protection Program and state homeland security officials. Emergency management plans are too often developed without the participation of local first responders or mall store owners and their security staff. Drills to test the security staff's knowledge of what to do in emergencies—when done at all—are seldom rigorous, seldom done with first responders, and are usually done without clear standards to measure their success. Many malls do not even have plans to limit access to sensitive areas in times of heightened alert. Many state homeland security offices have not taken an active interest in working with large malls to enhance security.

The situation in the U.S. stands in sharp contrast to what we observed in our visits to Israeli malls, where security is the top priority and there is a strong partnership between the public and private sector. No reasonable person would suggest importing the level of security used in Israeli malls to the U.S. given the present security environment. Additional terrorist attacks feared after 9/11 so far have not materialized. People would not stand for queuing to pass through metal detectors at malls, and there is no reason to ask them to do so. As a society, we have a strong predisposition against the kind of ethnic profiling that is standard practice in Israeli malls. There is no justification for U.S. malls to spend nearly half of their operating budgets on security.

On the other hand, while there is no reason to take the extreme security measures that have been adopted in Israel, the threat of terrorist attacks in the U.S. is real, and preparedness ought to be substantially higher than before the 9/11 attacks. The general belief seems to be that, if such an attack came, it would most likely occur in malls located in the large cities or states on the eastern seaboard or west coast. However, even if the possibility of an attack by ideologically inspired terrorists is discounted in some areas, many of the same security measures that would safeguard malls against that kind of threat also would serve also to protect against other disasters as well. Risk assessments, emergency management plans, and drills would help mitigate the effects of random terrorist acts such as the one that occurred in Tacoma, as well as the effects of fires, earthquakes, and other natural disasters.

Steps to Take

Prudent steps can be taken by malls and state homeland security offices, steps that are not expensive and would not alter the experience of consumers. These include:

Conduct formal risk assessments and take steps to mitigate known risks on a cost-benefit basis.

In our site visits, we visited places where local police were not interested in conducting risk assessments in malls. We also found a mall that was not interested in having a risk assessment done because owners were worried that, in the event of a disaster, they could be held liable if they had failed to act on the findings of the assessment. Some states are doing a good job of working with malls to see that risk assessments are done, but homeland security advisors in all states should make sure that large malls have risk assessments conducted by trained experts.

Risk assessments will highlight areas in which malls are particularly vulnerable. In many cases, steps can be taken to reduce the risk; for example, access to air circulation systems and other sensitive areas can be curtailed, deliveries can be tightly monitored, and passive barriers can prevent a car with explosives from penetrating heavily populated areas. While some measures may involve considerable cost, others are relatively inexpensive or even cost-free.

Develop and rehearse detailed and coordinated emergency response plans and involve stakeholders.

Emergency response plans can only work if they contain clearly delineated roles for security staff in time of crisis and if security staff know them well enough to respond instinctively. To be effective, the plans need to be developed and rehearsed in coordination with first responders, to whom mall security staff will hand off responsibility. Effective plans also must involve mall tenants, have clearly defined responsibility for ordering evacuations, and incorporate reliable methods of communicating with first responders and tenants. Homeland security advisors in all states should coordinate the development and rehearsal of emergency response plans, possibly under the direction of national guidelines established by DHS.

Standardize antiterrorism training courses.

Most mall security staff currently receive some form of antiterrorist training. But the methods, substance, and quality of these courses vary. States should set minimum standards for the frequency of these courses, the material covered, and the learning methods used. The curricula should be accompanied by performance measures to assess how effectively the training increases participants' knowledge of terrorism issues and helps them incorporate this understanding into daily routines.

Enhance partnerships with the public sector.

Even though malls are privately owned, partnership with government is essential to ensure the best security systems. State homeland security officials and first responders have the requisite expertise and therefore have a role to play in helping malls conduct risk assessments, develop emergency management plans, and rehearse protocols in various disaster scenarios. First responders also need to develop workable protocols for ensuring that intelligence information that affects malls can be and is shared with responsible parties. State homeland security officials should ensure that first responders in each locality have formed these partnerships with large malls and ensure that security staff at each mall receive sufficient training in anti-terrorism efforts. State officials should also ensure that the standards in their states with regard to qualifications and training of security guards meet national guidelines.

These kinds of measures—risk assessment, mitigation of known risks, emergency plans developed and rehearsed with first responders, standardized antiterrorism training curriculum, and a better partnership with government officials—would bring malls into compliance with the National Fire Prevention Association standard for emergency management programs, which was endorsed by the 911 Commission. The recent court decisions based on the two World Trade Center attacks indicate that this commitment would reduce the industry's liability in future lawsuits that could result from an attack by ideologically driven terrorists, lone gunmen, or natural disasters.

¹ Dan Bilefsky and Ann Zimmerman, et al, "Can Shoppers Be Kept Safe? — Bomb Threat Against Ikea In Europe Spurs Stores, Malls To Reassess Security Measures," *The Wall Street Journal*, 5 December 2002.

² "Suspect in Tacoma mall shooting sent angry text messages before rampage." *Minneapolis StarTribune*, November 21, 2005.

³ Robert Salladay, "Davis Signs Bills to Give Security a Boost; Private Guards must Complete Criminal Checks," *The San Francisco Chronicle*, 16 September 2002, p. A. 16.

⁴ Mimi Hall, "Private Security Guards: Homeland Defense's Weak Link," *USA Today*, 23 January 2003, p. A. 01.

⁵ Sherry L. Harowitz, "The New Centurions," *Security Management Online*, January 2003.

⁶ Peter D. Hart Research Associates, *A Post-September 11 Report on Surveys of Security Officers in California, Texas, and Florida* (Washington, D.C.: Prepared for the Service Employees International Union (SEIU), 2002).

⁷ "The 9/11 Commission Report. www.gpoaccess.gov/911/

⁸ BZPP grant decisions were made by DHS, but informed by recommendations of state homeland security advisors.

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