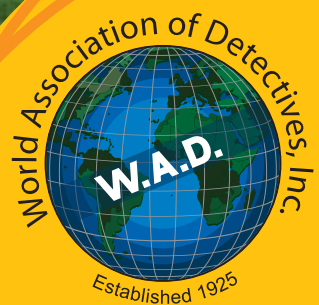
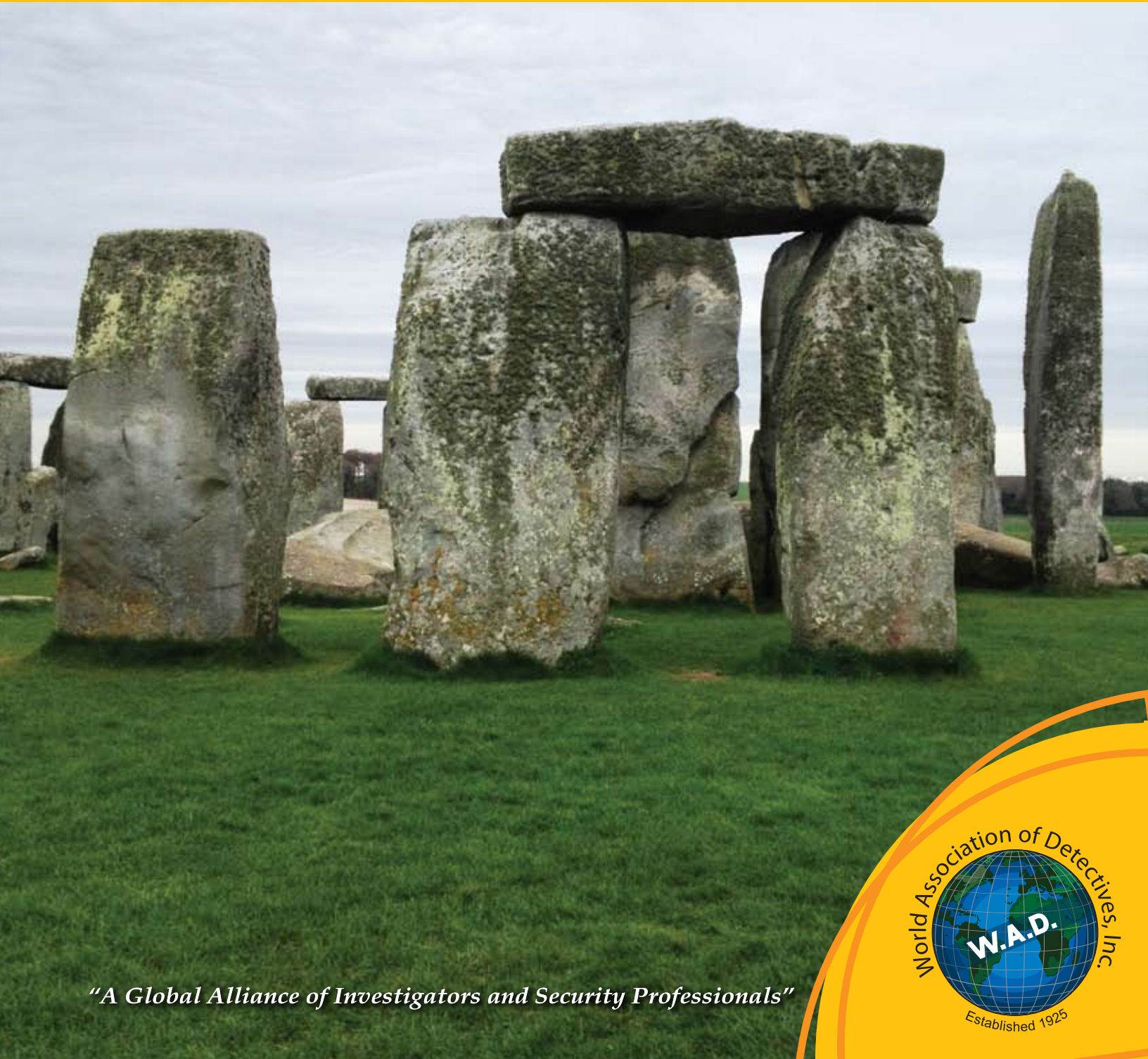


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June - August 2013
2013 Membership Directory

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A Quarterly Journal for Investigators and Security Professionals



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Editor's Pen



Artificial intelligence has today become an important field of study. While computers may not replace humans in making complex judgements and decisions, but with artificial intelligence, computers are able to be "trained" to think like humans.

The accelerating power of computers to learn based on human's knowledge and skills through recognising complex data is making artificial intelligence one of the technologies that could perhaps "manipulate the real world". There is fear among academicians about how artificial or machine intelligence would interact with the external world. Artificial intelligence has the capability to overtake human's capacity to control the possible consequences

While information systems combining transactional information and analytical information allows organisations to manage and process business processes efficiently to make better informed decisions, the current speed of technology advancement creates a gap with human's understanding of its implications. The lack of resilience in our technology-dependent society and social fragility widens the gap. An error could create terror.





The question now arise, how would artificial intelligence impact the business of information gathering and investigation? Are we equipped to advance with artificial intelligence?

Siti Naidu

Editor

We welcome readers' comments. You may email to the Editor your contributions.

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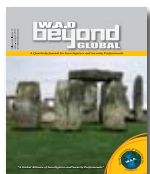


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7501 Sparrows Point Blvd, Baltimore, Maryland 21219, USA
Tel: +1-443-982-4586 Fax: +1-410-388-9746 E-mail: wad@wad.net

Editor: Siti Naidu
adiin@corporaterisks.com.my



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by Siti Naidu

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Dear W.A.D.members,

Look for our new website!

Limited resources make it a little more difficult but soon you will see a great new website. One great improvement will be our new worldwide directory of Security and Private Investigation laws. Our member Dean Beers, from USA, is helping us recollecting all the USA and global data. Thank you Dean! Soon you will see a link to your country laws in our directory, please review it and let us know if we are still missing the laws of your country to add them immediately.

and outstanding beaches. Los Cabos is also one of the best places in the world to see the Humpback whales. We are going to be there right in the middle of the whale season when the baby Humpback whales are born and start growing in preparation for their journey back north.

Enjoy Rome!

Congratulations to my good friend Christine Vinson, third generation of WAD members, who is becoming President. WAD needs her never-ending enthusiasm and young vision to be prepared for a better future.

Thank you for this great year!



We had a great time in London

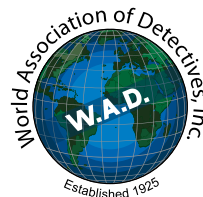
Congratulations to the Association of British Investigators for such a magnificent centennial celebration. The visit to the Parliament (House of Lords) was simply outstanding.

See you in Los Cabos, Baja California, Mexico in 2014!

Los Cabos consists of two enchanting and different cities, with their own remarkable features, joined by a 20-mile corridor. San Jose del Cabo, an 18th Century mission town, still keeps all its historic flavor and picturesque charm. Cabo San Lucas, a modern and bustling town that burst with stores, restaurants and an exciting nightlife. The Tourist Corridor is home to luxurious hotels, a collection of championship golf courses

Fernando Molina

Fernando Molina
WAD President 2013



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EXECUTIVE DIRECTOR'S BRIEF

Dear Members,

As I write this many of us are preparing to travel to Rome for our 88th Annual Conference. I think Rome is one of those cities that are on most people's "bucket list". To be able to travel there and share the experience with 150 or so of my WAD friends will be very special. Many of our long time members have registered saying that this is a meeting they do not want to miss.

I very much enjoyed seeing so many of you at our Mid-Term Meeting in London in August. WAD was proud to present the first ever Richard Jacques-Turner Annual Award for Excellence to WAD Member and ABI President Tony Imossi. This was history in the making at the ABI Banquet, and it is now up to ABI to select a deserving recipient each year from among their members, much like the tradition ABI started with WAD in 1976 with the WAD Investigator of the Year.

By the time all of the dues were collected this year we only had 30 non-renewals. Not as good as the 17 non-renewals last year, but still a good indication all of those who work so hard on your behalf are doing something right. Membership is nearing an all-time high, and those numbers of course, assist us in presenting a better product to our members.

Speaking of hard working members, I want to thank our President for his work and dedication to WAD this past year. Fernando Molina of Mexico was our first Latin American President. He will be welcoming us to Cabo San Lucas, Mexico in March 2014 for his Mid-Term and Board of Directors Meeting. We will be staying at the beautiful Fiesta Americana Resort for only \$180 per night. I toured Cabo with Fernando, wife Devi, and son Elio. I know you will all love this resort and the hospitality of the local area.

I would also be remiss if I didn't thank our other hard working officers, Chairman Siti Naidu, 1st VP Christine Vinson, 2nd VP Chuck McLaughlin, 3rd VP Matthias Willenbrink. Our officers, along with Administrative Manager Carolyn Ward and New Applicant Manager Rockne Cooke, have made this another great year for WAD. Assisting us are many Directors, Committee Chairs, Area Governors, and Ambassadors who all make this a tremendous organization to be a part of.

Bob Heales

Sincerely,
Bob Heales
WAD Executive Director

In Friendship,



Association Manager and Executive Director

W.A.D EXECUTIVE OFFICERS 2012 - 2013



Siti Naidu
Chairman of the Board
C-2-28 8 Avenue Business Center
Jalan Jernih 8/1, Section 8
P.J. 40650 Kuala Lumpur, Malaysia
Tel: +6-03-7956 9989
adlin@corporaterisks.com.my



Fernando Molina
President
Empresa #186-302
Col. Extremadura Insurgentes
Mexico City, CP03740, Mexico
Tel: +52-55-5563-7081
fernando@incomer.com.mx



Christine Vinson
1st Vice President
955 Howard Avenue
New Orleans, Louisiana
70113, USA
Tel: +1-504-529-2260
cvinson@vinsonguard.com



Chuck McLaughlin
2nd Vice President
2 Dundee Park
Andover, Massachusetts
01810, USA
Tel: +1-978-474-8801
chuck@mclaughlinpi.com



Matthias Willenbrink
3rd Vice President
Freiheit 12 ab
12555 Berlin,
Germany
Tel: +49 30 2000 506 60
mw@axom.de

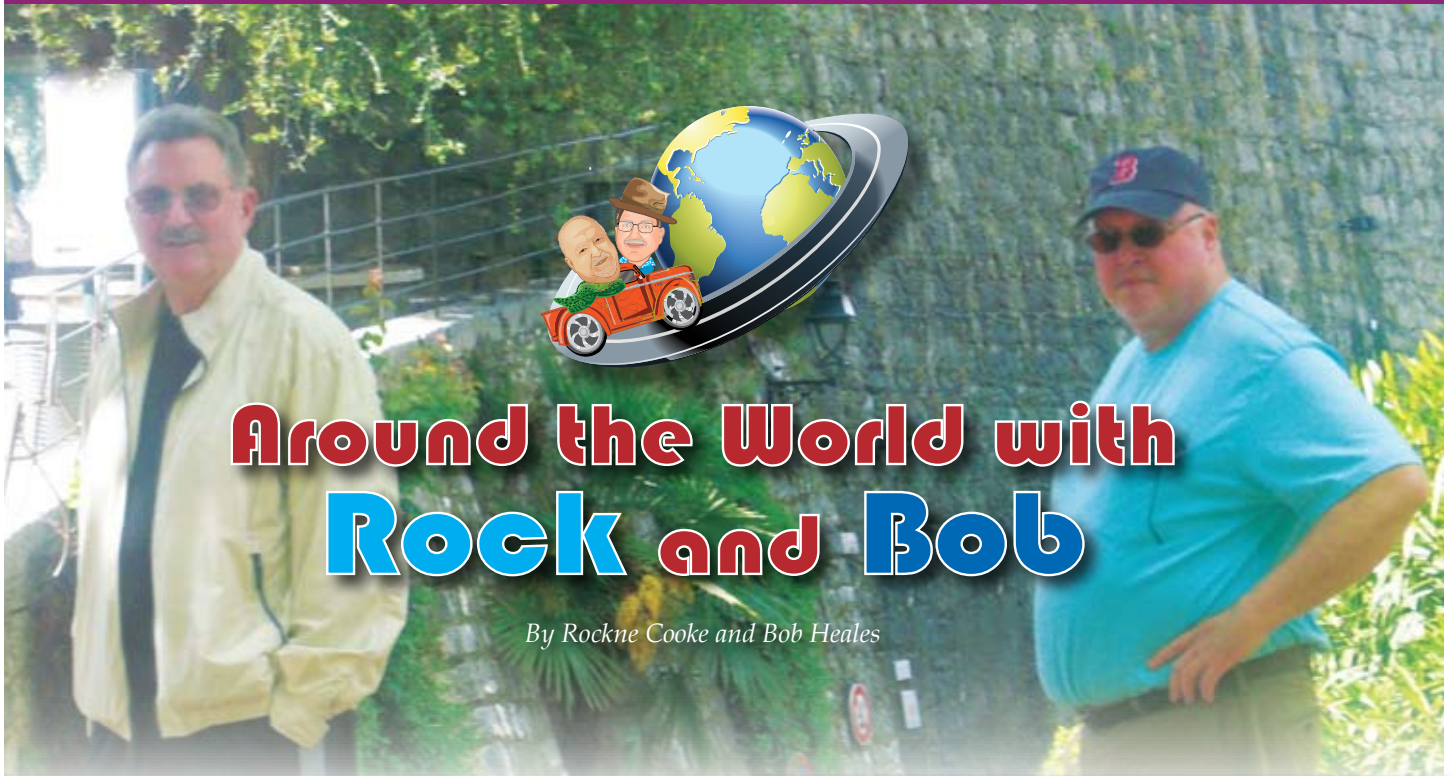
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Administrative Manager
Carolyn Ward

Historian
Robert A Heales

Parliamentarian
Rockne F. Cooke

Sergeant-At-Arms
Fares Atoum



Around the World with Rock and Bob

By Rockne Cooke and Bob Heales

Fernando Fernandez of Puerto Rico sent his greetings along with several nice photos from his world tour. He was in Canada, all across the USA, and several places in the Caribbean.



In this picture he appears to be caught up in a blizzard, but he is actually at the White Sands National Monument in New Mexico.



Hai Yang of China took this breathtaking photo of Watch Hill in Tokachi Town, southeast of Hokkaido, Japan.

He says "Confronting those mountains and visitors, I can't help pressing down the shutter to keep such wonderful and harmonious scenery between human beings and nature, once looking at it again, it would remind me of a poem composed by a Chinese poet named PienChihlin, it said 'as you are enjoying the scenery on the bridge, upstairs on a tower people are watching you'".



In the next picture we see him hanging out on the set of America's Most Wanted in Washington, DC. He has a radio show every Sunday from 6 to 7 PM at www.radioisla1320.com.



Neil Wood of Australia reports that Peter Wong (pictured below) of their Hong Kong office has just been appointed as GCS Group Regional Director for Asia Pacific. Many of us remember meeting Peter at our conference in Hong Kong in 2011. Congratulations Peter.



Keith Schafferious of Australia shares a passion for classic cars with a certain WAD Executive Director.



Here Keith shows off a couple of before and during photos of the 1952 Fiat Topolino he has been restoring. Number 8 in his collection. Bob's collection tends to be a little smaller because I he finds new homes for them now and again.



This near perfect 1971 Chevrolet C-10 short box pickup hung out in Crosslake, Minnesota for 15 years until Bob sold it to a local friend. It spent its first 28 years on a ranch in Northern California before finding a home in Bob's barn.

Laila Saleh of Egypt submitted this great photo with 3 of her grandchildren



The photo was taken while touring the lakes in Germany. Next to Laila is Hossam, age 6, then Youssef, age 9, and then Lana, age 4. Looks like they are having a great time judging by all the big smiles.



Awwwwwww, we love babies. Gary Kutty of Ohio, USA sent this photo with his great nephew, Evan Richard Kutty.

This was taken on the day of his recent baptism in San Diego, California.



Phil Stuto of California, USA announced that his daughter Nicole will be getting married on November 1st at LaQuinta, California.

The beautiful soon to be bride is pictured here in the center. Bob first remembers Nicole as a talkative 9 year old entertaining everyone in Cannes, France in 1992 along with brother Shaun as Karaoke singers, and later in the week at the Annual Conference in Brussels. A year later at the annual conference in New York this brave little girl ran up to Florence Henderson (Brady Bunch Mom) who was having lunch a few tables away in the restaurant, and got her autograph. Bob was also there in Las Vegas a few years ago to help her celebrate her 21st Birthday with family and friends.



Here is a cute picture of Nicole during her early WAD entertainer and gymnast days. Congratulations Nicole, Phil, Kathy, and Shaun! Your WAD Family is happy for all of you.

Johnathan Tal of California, USA submitted this photo of son Josh who recently visited Holland.

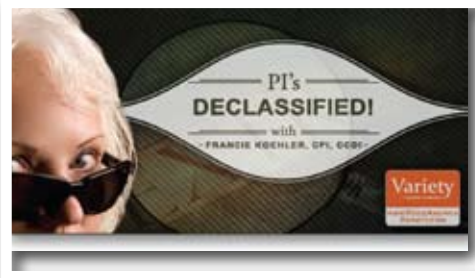


Josh is pictured here with his hosts, Jan Stekelenburg and wife Sylvia of Holland. What a great way to see the world. Travel abroad and visit with some of your WAD Family!



Eric Shelmerdine of England took this great photo of wife **Ann** and **Maureen Jacques-Turner** taking their car for a "topless spin" while visiting the Jacques-Turners at their home in Hull. Richard was busy trying to light the barbeque grill.

We understand Richard and Maureen are busy packing after selling their long time home and look forward to moving to their new "headquarters".



Francie Koehler of California, USA has been interviewing many WAD members lately on her weekly radio show, "PI's Declassified!".

The show airs every Thursday at 9:00 AM Pacific time and can be heard on the Voice America Variety Channel. PI's Declassified was launched to feature private investigators in a positive light and combat the myth fostered by TV and the movies. Thank you Francie!

Too busy to type reports? Those members needing confidential reports and documents typed and transcribed can reach out to Associate Member Susie Wright of California, USA. Susie has been doing this since 1978 and has been a familiar face at CALI Conferences. Email SusieWright@detectivehelp.com or go to www.susiewright.com.

And finally, **Neal Holmes** of Pennsylvania, USA reports that son Thomas has started an Indie music blog on Blogspot called the Pantomime Shark. He said some of our esteemed music lovers would love to check it out. The link is <http://thepantomimeshark.blogspot.com>.

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PARENTAL KIDNAPPING RECOVERY CASE

On July 16th a story broke on KXAN news in Texas and nationwide about the rescue last week of the two young boys, Zane and Mateo James who were kidnapped and taken on the run for 11 months. Logan Clarke (WAD) worked the case from the first month the boys were taken, July 22nd 2012. After 3 months of no help from any LE in Texas to issue warrants (even though the law states its a Felony Federal and state crime in Texas), Logan turned to NBC(KXAN) news and they agreed to investigate and follow the story and interview LE and politicians throughout the state. Like always, the news gets people to pay attention...Still LE were reluctant to call it a 'crime' and every DA insisted it was 'a civil matter'.

Finally with the news on the story for 5 months, in January a new DA was elected in Williamson County, Jana Duty and she did consider it a criminal matter just as the law reads. Her Sr. Investigator Sgt. Royger Harris was assigned the case and telephoned Clarke himself. Having never worked a parental kidnapping case before, Sgt. Harris asked Logan for his expert advise and help throughout the case. The two talked as often as 3 times per day, six days a week.

Logan had located the mom and kids in Orizaba Mexico but wasn't sure the information was positive. Since he was working the case pro-bona after the first month, he did not have the budget to confirm the lead. Harris filed criminal charges and issued a Felony Aggravated Kidnapping Warrant for the mother and the grandmother with a \$450,000.00 bail each, along with extortion charges and Unlawful Flight to Avoid Prosecution.. This of course allowed massive search warrants and subpoenas to be issued to Google, Yahoo and cell phone records.

Logan turned over all his leads and file info to Harris, who in turn shared all his information with Logan. Together they mapped out a plan and worked it daily. "In 35 years in this industry I have never received or seen such cooperation between a PI and a DA's office.." Clarke said

The information from the warrants and subpoenas confirmed the Orizaba location within 50 feet of an address. Which is where the boys were being held by their mother and grandmother who demanded money for their return. (She had been diagnosed as mentally unbalanced and suicidal when she lost custody of the boys.) Then Logan's Task Force was able to put 'eyes on the location' and obtain a photograph of one of the boys. Now it was a 'how to get them out' scenario.

At Logan's suggestion, Harris issued warrants of arrest for anyone who assisted the mother in any way from Texas. Even those who sent her money! They first arrested the aunt and locked her up. 'The family in Texas began to fold like a card table' Logan said. 'But the mother and grandmother stood strong in Mexico'.

Through creative and exceptional investigative techniques, which took Clarke and Sgt. Harris over 6 months of daily work, they were able to trick the mother into going to a Texas boarder town. Once there the Task Force, Sgt. Harris and a relative of the mother, facilitated their safe rescue from Mexico.

The case is a precedent setting solution for many Parental Kidnapping cases around the world and has the potential to bring home thousands of kidnapped children to their homes in America and the shattered lives of the victim parent left behind!

Most 'left behind' parents are told to 'go through the Hague Treaty' to get their children back. Unfortunately in most cases it takes 3 to 5 years and costs a fortune in legal bills. Even after that, there is no guarantee they will ever see their children again... much less get them home. The Hague Treaty is filled with 'loopholes'.

30 yrs. ago, when a parent was beaten by their spouse, the police would come over and tell them to 'knock it off and straighten things out so they don't have to come back'. There were few arrests because they saw it as a civil matter, in other words... 'Selective Prosecution'. Now, if you abuse your spouse you go directly to jail!

Like the police of 30 yrs. ago, too many DA's are choosing 'selective prosecution' and telling parents that 'It is a civil matter' when their spouse kidnaps their children. This is not true, it's a state and federal crime...

Now, because of this precedent setting case in Texas, DA's will have a blueprint on how to successfully act on the kidnapping case just as they were forced to act on spousal abuse!

50% of marriages end in divorce. Many people are afraid their spouse will kidnap the children and MANY do just that. They run to countries where US law is not recognized. That can all change now. The word just needs to get out to the public. They need to know what to do to prevent this horrific crime and how to get their children back.

District Attorney Jana Duty in Austin, Texas wants this to set precedents across the nation... but the word needs to get out. The discussion needs to begin now.

Two more children have been returned home in Texas just since the James boys rescue, using this exact method.

Fellow WAD members Allen Cardoza (A Task Force member) and Kelly Riddle of Kelmar Global in San Antonio, were instrumental in assisting the team in many aspects. Kelly Riddle was able to help Logan become a licensed private investigator in Texas as well.



In Laredo Tx with KXAN(NBC) news covering the story for 7 months of the kidnapping and rescue. They were a huge help to making it all happen along with the DA's office in Williamson county and DA Sgt. investigator Royger Harris ! Together we all made it happen Thank you all...Dad just got the news the boys are safe in USA.

I'm with my client Stephen James in Laredo Tx. and we have just rescued his kidnapped boys from Mexico and they are on US soil after an 11 month pursuit...

JANA DUTY
DISTRICT ATTORNEY

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Sergeant Roger Hantz

Wednesday, June 05, 2013

Today, a Grand Jury indicted Alma Alicia James and Alma Alice Morrow Gomez for Aggravated Kidnapping.

Aggravated Kidnapping is a First Degree Felony which carries up to 99 years to life in prison. State warrants have been issued for First Degree Felony Aggravated Kidnapping on both. Federal Unlawful Flight to Avoid Prosecution Warrants have also been issued on both.

Alma Alicia James is considered to be mentally unstable and has attempted suicide on multiple occasions.

The above named are United States fugitives. Per criminal statute, a person is criminally responsible for an offense committed by the conduct of another if acting with intent to promote or assist the commission of the offense, they solicit, encourage, direct, aid, or attempts to aid the other person to commit the offense. The commission of the offense of Aggravated Kidnapping by Alma Alicia James and Alma Alice Morrow Gomez is an ongoing criminal episode. They are fully aware they are violating laws of the United States and are fugitives from justice. Every day that passes is another day these two are committing the offense of Aggravated Kidnapping.


ANYONE who promotes or assists, solicits, encourages, directs, aids, or attempts to aid these two **WILL** be charged with Conspiracy to Commit Aggravated Kidnapping. This investigation is ongoing.

Sergeant Royger Harris
Office 512-943-1235

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Aggravated Kidnapping
And
Unlawful Flight To Avoid Prosecution

ALMA ALICIA JAMES



Aliases:
Alicia James, Alicia Gomez, Alma Alice James, Alicia Alma James, Alma Alicia James, Alma Alice Gomez

DESCRIPTION

Dates of Birth Used: 04-30-1979	Hair: Brown
Place of Birth: Mexico	Eyes: Brown
Height: 5'3"	Complexion: Medium
Weight: 130	Sex: Female
NCIC: W487184084/W137230712	Nationality: US Citizen

Scars and Marks: None Known
Remarks: Speaks English and Spanish. James is located in Orizaba Veracruz Mexico

If you have any information concerning this person, please contact your local US Marshals Office or the U.S. Marshals Service Communications center at 1-800-336-0102 or the nearest American Embassy or Consulate or the Williamson County District Attorney's Office.

A reward is being offered for information that leads to the arrest of Alma Alicia James

WAD MID-TERM MEETING & ABI CENTENARY AGM

25th - 27th APRIL 2013, LONDON, UK

By Richard D. Jacques-Turner, WAD President Emeritus

Members of the World Association of Detectives and the Association of British Investigators who attended the above meetings will, I am sure, testify to it being one of the best ever. We were also joined by the IKD Executive Committee members and members from the CII.

The proceedings commenced on the evening of Thursday April 25th with a welcoming cocktail party on HMS Belfast, a World War II heavy cruiser, which is moored in the river Thames as a permanent museum. We were entertained by the Royal Navy to a most interesting evening, hosted by BTG Global Risk Partners with a superb buffet and a free bar stocked with every drink you could wish for. 180 WAD, ABI, IKD and CII members, representing 29 countries, congregated to renew old friendships and network with colleagues from around the world.

Our Mid-term Board Meeting, presided over by Chairman of the Board Siti Naidu, was held on Friday April 25th and the minutes of the meeting are available for those interested. That evening was spent at the Houses of Parliament where we were taken on two fascinating tours of both the House of Lords and the House of Commons. This was followed by another superb cocktail party and buffet, in the Cholmondeley Room and on the terrace of the House of Lords, when 150 members were hosted by The Lord Mackenzie of Framwellgate OBE, a former Chief Superintendent in the Durham Constabulary and a former President of the Superintendent's Association of England & Wales. Lord Mackenzie graduated with an Honours Law degree from London University and is also a graduate of the FBI National Academy, Quantico, Virginia, USA.

The Centenary Annual General meeting of the ABI was held on Saturday April 26th, chaired by President Tony Imossi. As well as the usual business of the AGM (details of which can be obtained by





ABI members), there were 5 nominating presentations made for the Zena Scott-Archer Investigator of the Year Award. These were Alan Curtis, Anthony Davis, Paul Hawkes, Kevin Regan, all UK members, and Jan Stekelenburg of the Netherlands. All 5

investigations were worthy of nomination for the award but there can only be one winner, who received his award at the presentation ceremony that same evening at the Gala Banquet.



The Gala Banquet was held at the Grand Connaught Rooms with members and guests of all the participating Associations totalling almost 300. The Master of Ceremonies was Eric Shelmerdine, Past President of both ABI and WAD and currently the General Secretary of ABI, who ensured that the evening went smoothly from start to finish. The food was exceptional for a banquet of this size and the music from the live band, Jazzbomb, had everyone dancing.

There were, of course, all the usual speeches, plus the presentations of the Zena Scott-Archer Investigator of the Year Award to Alan Curtis, the Frank Martin Memorial Award for services to the ABI to President Tony Imossi and the Peter Heims Lifetime Achievement Award to George Rivers.

Bob Heales announced that a new award was being donated to the Association of British Investigators 'in friendship' from the World Association of Detectives and the first recipient was the ABI President, Tony Imossi. Imagine my astonishment when it transpired that this award is to be an annual award made in my name – the Richard Jacques-Turner Annual Award for Excellence. Never for an instant did I ever envisage that an award would be named after me and I can say that I am humbled by this statement of esteem from my colleagues in WAD.

295-297 Church Street
Blackpool
Lancashire FY1 3PJ
Telephone +44 (0)1253 297502
Fax +44 (0)1253 752185
Email info@theABI.org.uk
www.theABI.org.uk

Monday, July 29, 2013

Dear Siti,

It has taken us a while to audit the finances for the Centenary AGM and I am pleased to say that despite the huge commitments and not least the logistical challenges, the whole event worked out as planned.

The achievement in breaking evens financially was only possible because of the generous support given to the Association of British Investigators by its sponsors.

I write to formally thank you for your strong support and in particular the WAD members' enthusiastic participation.

Yours sincerely,
Tony Imossi
Tony Imossi
President

WAD MID-TERM MEETING SPONSORS

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- Siti Naidu

VALE - Warren Mallard

Warren "The Duck" Mallard, 64 years, passed away following a battle of cancer on 28 June 2013. He is survived by partner Anna Robilliard, daughters Kesa & Brooke and stepsons Todd & Jess.

Warren spent 11 years with the NSW Police before retirement on medical grounds following significant injuries sustained on duty. In 1982, he helped establish Lyonswood Investigations which grew to be one of Australia's most respected and trusted private and forensic investigation companies.

Warren enjoyed many investigative successes – quite a few were significant:

In the 90's Warren and his team coordinated extensive complex investigations for GIO which ultimately proved a criminal network were operating throughout Sydney suburbs staging motor vehicle accidents to give rise to fraudulent third party personal injury claims.

More recently Warren increasingly worked with the public, regularly taking on work for the victims of scammers and fraudsters. His determination for success shone in the challenge of outing and stopping those who brought his beloved investigation industry into disrepute.

Some years back, he pursued and ultimately stopped a Sydney based training organisation which had been duping tens of thousands of dollars from gullible students on false promises its courses would qualify those individuals to gain a CAPI licence.

Those who preyed on emotionally vulnerable persons to extract up front large sums to undertake unnecessary and pointless investigations, discovered that whenever learning of such situations Warren would fearlessly pursue those operators to expose their fraudulent activities and then assist the regulators to shut down their activities.

Many will have heard Warren speak of his nemesis of more than 24 years, the colourful and infamous Frank Monte. Warren identified Monte and his investigation business as being at the centre of widespread fraudulent activities. He gathered evidence that Monte's activities included creating fake names for private detectives, taking thousands of dollars from unsuspecting clients, then abusing and threatening them when they complained.

Assisted by the evidence Warren had collected, action was taken by NSW regulators and eventually this saw Monte stripped of his private investigator's licence in late 2012. This milestone vindicated Warren's efforts to rid the industry of a serial unethical operator.

Many in our industry enjoyed through Warren and his company Lyonswood Investigations their first opportunity of actual work and industry experience. He was always willing to help others master their investigative craft.

Warren believed in the benefit of industry associations, not only joining but also leading a number of those groups at various times. He was a member of the IMA for 23 years and a Life Member of the World Association of Detectives following 25 years of membership.



Through the IMA Warren represented the industry in many meetings with government and regulators on matters of industry licensing, training and conduct. He was an enthusiastic, passionate and effective champion for the private investigation industry. He was a regular contribution to this magazine.

Warren was often called upon by the media as an expert in his fields of private investigation practice and additionally assisted many journalists in getting to the facts in their investigation pieces on corrupt and fraudulent activities in the community.

His pursuit of excellence and successes in the detection and prevention of crime was acknowledged by 3 awards by Commissioners of Police for acts of bravery and assistance to the police whilst operating as a private investigator.

Messages from industry friends around the globe describe Warren as a fine man, a true gentleman, an industry leader, a true investigation professional, one of the great investigators in the world and the most creative salesman. He was known and respected as a great investigator and a great fisherman with plenty of stories to tell for both - a joke up his sleeve but with a wise word to follow.

An appropriate place to close is to share one of Warren's jokes:

Sherlock Holmes and Dr. Watson went on a camping trip. As they lay down for the night, Holmes said: "Watson, look up into the sky and tell me what you see?"

Watson replied, "I see millions and millions of stars."

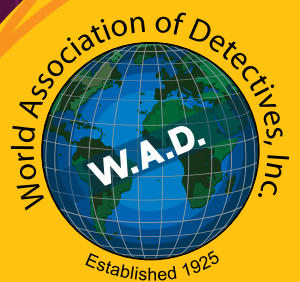
"And what does that tell you?" asked Holmes.

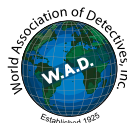
Watson replied: "Well, it tells me that there are millions of galaxies and potentially billions of planets. It tells me that God is great and that we are small and insignificant. It tells me that we will have a beautiful day tomorrow.... What does it tell you?"

Holmes: "Somebody stole our tent."

The Institute Merchandise Agent (IMA) CEO Alan Harries who wrote this article spoke at Warren's funeral and shared with those in attendance that "Warren's contribution to our industry, his professionalism, integrity, determination, good humour and friendship will be long and sorely missed".

2013 MEMBERSHIP DIRECTORY





W.A.D 2013 MEMBERSHIP DIRECTORY

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Alphabetical List of Members

Adams, Mark	USA, California, Santa Rosa	Blomjous, Christiaan	Netherlands, Capelle aan den IJssel
Adar, David	Israel, Pardes Hana	Böckmann, Guido	Germany, Neuwied
Ahluwalia, Satnam	India, Kolkata	Bodeholt, Uffe	Denmark, Copenhagen, Hoersholm
Ahluwalia, Pawanjit	India, New Delhi	Boffa, Patrick	France, Beausoleil
Ahn, John	South Korea, Seoul	Bombet, Julius	USA, Louisiana, Baton Rouge
Akbag, Engin	Germany, Kassel	Bongers, W.P.	Netherlands, The Hague
Akhigbe, Theophilus	Nigeria, Lagos	Bonvini, Fausto	Switzerland, Zurich
Al Kilani, Maher	Jordan, Amman	Borders, Greg	USA, Texas, Arlington
Ali, Peringalon	India, Bombay (Mumbai)	Borio, Federico	Italy, Opera
Alighieri, Massimo De Paoli	Italy, Brescia	Bottino, Valerio	Italy, Genoa
Allan, Bradley	Hong Kong, Central Hong Kong	Brabston, Thomas	USA, Alabama, Mobile
Alliaume, Jorge	Uruguay, Montevideo	Brammer, Malcolm	Australia, New South Wales, Castle Hills
Altes, J. Patrick	USA, Florida, Daytona Beach	Brero, Mario	Switzerland, Geneva
Alunno, Giancarlo	Italy, Rome	Brewer, R.Q.	USA, Tennessee, Memphis
Anastasi, Paul	Greece, Athens	Brewer-Johnston, Robin	USA, Tennessee, Memphis
Anderson, Bruce	USA, Florida, Valrico	Bridges, Stuart	England-UK, Oxfordshire, Oxford
Anjum, Zafar	United Arab Emirates, Dubai	Brockbank, Robert	Canada, Ontario, Oakville
Anthony, Wilfred	Singapore, Singapore	Bromberg, Paul	Hong Kong, Central Hong Kong
Archer-Dickerson, Stephanie	USA, Colorado, Littleton	Bromberg, Paul	Thailand, Bangkok
Armstrong, Kimberly	USA, Texas, Austin	Brown, Samuel	USA, California, San Francisco
Arora, Kanwaljeet	India, Ahmedabad	Brown, Nigel	England-UK, London - Greater, London
Arora, Jaspreet	India, Ahmedabad	Bruchez, Leonard	Switzerland, Monthey
Arora, Gurdeep	India, Pune	Bucklin, Roy	USA, Illinois, Buffalo Grove
Arteaga Moreno, Jose Antonio	Spain, Marbella	Bumbaru, Maria	Romania, Bucharest
Ashenoff, Richard	USA, Florida, Miami	Burette, Ron	USA, Missouri, Bridgeton (St. Louis)
Ashton, Mel	USA, Utah, Sandy	Busetto, Lorenzo	Italy, Pordenone
Asson, Alexander	West Indies, Trinidad	Butcher, Bill	USA, North Dakota, Bismarck
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August, Brandon	USA, California, Concord	Caldwell, Tamara	Canada, Ontario, Toronto
Augustine, Charles	USA, Ohio, Cleveland	Campbell, Graeme	Philippines, Makati City
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Azari, Aviram	Israel, Haifa	Cappiello, Onofrio	Italy, Milan
Bahr, Annett-Susann	Germany, Berlin	Cardoza, Allen	USA, California, Newport Beach
Baker, Rodney "Rod"	USA, Oklahoma, Tulsa	Cardoza, Allen	USA, California, Los Angeles
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Balinton, E. R.	USA, California, Oakland	Castillo, Troy	USA, California, Palm Springs
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 Cook, James
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 Cooke, Rockne
 Cooke, Rockne
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 Coward, Jr., Frederick
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 Derish, Seth
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Hawkes, Paul	England-UK, London - Greater, London	Kawamura, Shingo	Japan, Tokyo
Haworth, Don	USA, Illinois, Chicago	Kazakian, Harry	USA, California, Woodland Hills
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He, Wei	China, Fujian Province, Xiamen City	Kearns, Georgia	USA, Washington, Seattle
Heales, Robert	USA, Colorado, Denver	Kellerman, Gregory	USA, Illinois, Glen Carbon
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Heim, Andreas	Germany, Berlin	Kessler, Michael	USA, New York, New York
Helfand, Edouard	Indonesia, Jakarta	Kiernan, Cortney	USA, Connecticut, Newington
Helm, Janet	Canada, British Columbia, Vancouver	Kimble, Jeffrey	USA, Arizona, Mesa
Herget, Alexander	England-UK, London - Greater, London	Kimm, Lothar	Germany, Dortmund
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Hershman, Michael	USA, Virginia, Mclean	King, Kimberly	USA, California, San Francisco
Herter, Ralf-Peter	Germany, Duesseldorf	Kinnerk, Daniel	USA, Illinois, Mchenry
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Higazi, Dr. Maher	Germany, Hanhofen	Kirschner, Robert	USA, California, Huntington Beach
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Hinds, Claude	USA, Ohio, Cincinnati	Kjellberg, Stellan	Finland, Helsinki
Hiroshima, Sumio	Japan, Tokyo	Kjellberg, Stellan	Sweden, Gothenburg
Hiroshima, Mika	Japan, Tokyo	Kjellberg, Stellan	Sweden, Stockholm
Hobbs, Leonard	USA, California, San Francisco	Klamser, Andy	USA, Alaska, Homer
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Hodgson, Mark	England-UK, West Yorkshire, Leeds	Klenkler, Franz	Germany, Karlsruhe
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Hooker, Kevin	England-UK, Merseyside, Liverpool	Koelle, Christian	Germany, Hannover
Hooks, Kevin	USA, Virginia, Fairfax	Kogut, Yuriy	Ukraine, Kiev
Hope, John	England-UK, West Midlands, Birmingham	Koh, Lawrence	Singapore, Singapore
How, Dato Teck Hooi	Malaysia, Selangor	Korelov, Aleksey	Russia, Moscow
Howatson, Richard	England-UK, Sussex - West, Worthing	Koyama, Goro	Japan, Tokyo
Hubbard, Don	USA, North Carolina, Charlotte	Kruger, Michael	Israel, Ramat-Gan
Hull, Francis	England-UK, Nottinghamshire, Nottingham	Krioni, Alexandr	Russia, Moscow
Hunter, Keith	England-UK, London - Greater, London	Kumar, Sachit	India, New Delhi
Hussain, Khalid	Pakistan, Lahore	Kumar, Bandlish	India, Bombay (Mumbai)
Hutchinson, Sean	West Indies, Trinidad	Kumar, Puneet	India, Bangalore
Ibossi, Tony	England-UK, London - Greater, London	Kumar, Jitender	India, New Delhi, Vikas Puri
Ingan, Sheryll	Philippines, Quezon City	Kumar, Perumal	Singapore, Singapore
Ionut, Guta	Romania, Pitesti	Kumar, Vivek	India, Bombay (Mumbai)
Isaac, Capt. Shibu	India, Chennai	Kunda, Joann	USA, New York, New York
Ito, Hiroshige	Japan, Tokyo	Kusic, Mark	Canada, British Columbia, Vancouver
Jacobs, Simon	England-UK, Merseyside, Birkenhead	Kuster, Steven	Netherlands, Schiphol-Rijk
Jacobs, Paula	England-UK, Merseyside, Birkenhead	Kuty, Gary	USA, Ohio, Dayton
Jacobs, Alan	England-UK, Merseyside, Birkenhead	LaCorte, Mike	England-UK, London - Greater, London
Jacques-Turner, Maureen	England-UK, East Yorkshire, Hull	Laframboise, Louis	Canada, Quebec, Montreal
Jacques-Turner, Richard	England-UK, East Yorkshire, Hull	Lahiri, Taralika	India, New Delhi
Jadeja, Raghuvir	India, Rajkot	LaLuna, Jeanne	USA, New York, Patterson
Jaekel, Martin	Canada, Ontario, Hamilton	Langford, Laurie	USA, South Carolina, Mt. Pleasant
Jain, Naman	India, Bombay (Mumbai)	Lankery, Haim	Israel, Haifa
Jain, Naman	India, Bangalore	Lapid, Jacob	Israel, Ra'anana
Jain, Naman	India, Uttar Pradesh, Noida	Lapworth, William	USA, Illinois, Naperville (Chicago)
Jaitner, Jurgen	Germany, Wiesbaden	Lapworth, William	USA, North Carolina, Charlotte
Janta-Lipinski, Artur	Poland, Czulchów	Lapworth, William	USA, Indiana, Indianapolis
Jarvis, Lachlan	Australia, New South Wales, Drummoyne	Lautzenhiser, John	USA, California, La Mirada
Jensen, Claus	Denmark, Copenhagen	Lavaron, Claude	USA, Florida, St. Petersburg
Johnson, Vincent	England-UK, Cambridgeshire, Cambridge	Lawson, Thomas	USA, California, Rancho Sta Margarita
Johnson, Don	USA, Indiana, Bloomington	Lazarovitz, Josef	USA, California, Van Nuys
Johnson, Heidi	USA, Nevada, Las Vegas	Leahu, Aurel Simion	Moldova, Chisinau
Jones, Daniel	USA, Arizona, Mesa	Lebendiger, Yirmiyahu	Israel, Mevaseret Zion

LeFevour, Kathryn	USA, Illinois, Chicago	McHenry, Mike	Mexico, San Miguel De Allende
Lerner, Russell "Rusty"	Thailand, Bangkok	McIntyre, Tim	USA, North Carolina, Winston-Salem
Leto, John	USA, New York, New York	McIntyre, Lawrence	USA, Wisconsin, Waukesha (Milwaukee)
Levi, Ron	USA, Pennsylvania, McMurray	McLaughlin, Charles	USA, Massachusetts, Andover
Levicoff, Warren	USA, Ohio, Hideaway Hills	McNulty, John	England-UK, Nottingham, Wollaton
Levy, David	Israel, Tel-Aviv	McWherter, Larry	USA, Illinois, Peoria
Leykam Barbieri, Jessica	USA, Missouri, Saint Louis	Medina, Ernesto	Philippines, Mandaluyong City
Li, Fuk-Ki	Hong Kong, Kowloon	Meisch, Werner	South Africa, Johannesburg
Li, Guorong	China, Beijing	Meismann, Alfons	Germany, Dorsten
Liebel, Johann	Germany, Monchengladbach	Mendez, Danilo	Philippines, Las Pinas City
Lim, Cheng Hock	Malaysia, Selangor	Mendis, Capt M G G	Sri Lanka, Pannipitiya
Limone, Alberto	Italy, Milan	Menezes, Sujeet	India, Bombay (Mumbai)
Liu, Wei	China, Beijing	Menon, Puthenveetil	India, Bombay (Mumbai)
Liu, Zhong Ren (Louis)	China, Guangdong Province, Shenzhen	Mesis, Jimmie	USA, New Jersey, Freehold
Liu, Changjiang	China, Beijing	Mevoula, Théophile	Cameroon, Yaounde
Liu, Xiaoming	China, Xiangtan	Michel, Joel	USA, California, La Quinta
Liu, Wendy	China, Beijing	Michel, Joel	USA, California, Burlingame (San Francisco)
Lohia, Tej	India, New Delhi	Mickle, James	USA, Michigan, South Lyon
Lommen, Vance	USA, California, Foothill Ranch	Mignolet, Jean	USA, Florida, Ft. Lauderdale
Loncaric, Robert	Canada, British Columbia, Vancouver	Mikkelson, Brett	Panama, Panama
Long, Robert	USA, Massachusetts, Norwell	Miley, Raymond	USA, Pennsylvania, Lansdale
Lotze, Manfred	Germany, Dusseldorf	Miller, James	USA, Illinois, Woodridge
Lozada, Paul	USA, California, San Francisco	Milne, David	Thailand, Bangkok
Lozada, Shannon	USA, California, San Francisco	Minor, John	USA, Texas, Odessa
Luzzi, Gianpaolo	Italy, Tuscany, Livorno	Mintz, James	USA, New York, New York
MacDaniel, Mark	USA, Connecticut, Shelton	Mocanu, Genovi Leon	Romania, Galati
MacMullen, Craig	Canada, Nova Scotia, Halifax	Mogilnyi, Oleksandr	Ukraine, Donetsk
Madan, Ramesh	India, New Delhi	Molina, Fernando	Mexico, Mexico City
Mager, Heinrich	Germany, Ober Ramstadt	Montgomery, Linda	USA, Washington, Seattle
Maheu, Peter	USA, Nevada, Las Vegas	Montgomery, Reginald	USA, New Jersey, Allendale
Mahurkar, Vikram	India, Gujarat, Gujarat	Moritz, John	USA, Texas, Houston
Maier, Bernhard	Austria, Vienna	Morley, Trevor	New Zealand, Wellington
Major, Bernard	Canada, British Columbia, Langley	Morozov, Sergey	Russia, Moscow
Malavolti, Marco	Italy, Modena	Morris, James	Canada, Ontario, Markham
Malik, Osman Ali	Pakistan, Karachi	Morris, Charles	England-UK, Shropshire, Shrewsbury
Malik, Rashid Ali	Pakistan, Karachi	Morris, Michael	England-UK, London - Greater, London
Mallen, Brendan	Ireland, Portlaoise Co. Laois	Morse, Harvey	USA, Florida, Daytona Beach
Maneckshaw, Navzar	India, Bombay (Mumbai)	Moser, Nathan	USA, California, Menlo Park
Mangiacasale, Francesco	Italy, Milan	Moses, John	England-UK, Northumberland, Berwick Upon Tweed
Maniwang, Antonio	Philippines, Quezon City	Mostowski, Tomasz	Poland, Warsaw
Manosperti, Lino	Italy, Milan	Moyse, Mark	USA, New York, Brooklyn
Manzini, Marco	Italy, Novara	Muehlemann, Enzo	Switzerland, Savosa
Marco, Francisco	Spain, Barcelona	Mueller, Lothar	Germany, Berlin
Marcusanu, Mihai	Romania, Bucharest	Muniyandy, M. Barathan	Malaysia, Selangor
Marks, David	USA, Florida, Pompano Beach	Murdock, R P (DOC)	Mariana Islands Northern, Saipan
Marquez, Richard	USA, Texas, Addison	Myer, Terry	USA, Ohio, Reynoldsburg/Central Ohio
Marshall, William	USA, Virginia, Centreville	Myers, Fred	USA, Arkansas, Little Rock
Martin Polvorinos, Cesar	Spain, Madrid	Naidu, Narasimha	India, Chennai
Martinelli, Robin	USA, Georgia, Lawrenceville	Naidu, Siti Subaidah	Malaysia, Selangor
Martinez-Llorente, Javier	Spain, Madrid	Naimish, Carmen	USA, California, Santa Barbara
Masuda, Hiroaki	Japan, Tokyo	Nalikowski, Peter	Germany, Dieburg
Matan, Ben Dror	Israel, Jerusalem	Nanda, Diwan	India, Bombay (Mumbai)
Matei, Sorin	Romania, Timisoara	Napoleone, Agatino	Italy, Genoa
Mattisson, Anneli Terese	Sweden, Malmo	Nathan, Ira	Israel, Petah Tikva
Mauquoi, Michel	Thailand, Bangkok	Naveh, Meir	Israel, Haifa
Mauro, Madonia	Italy, Torino	Neal, Warren	South Africa, Johannesburg
Mayne, Ashley	Australia, Victoria, Carnegie	Nehyba, Ing. Andreas	Austria, Vienna
Mazzilli, Joseph	USA, New York, Brooklyn	Nester, Harold	USA, Missouri, Springfield
Mazzone, Peter	USA, California, San Diego	Newman, George	USA, California, San Diego
Mazzullo, Giuseppe	Italy, Rome	Newman, Eitan	Israel, Tel-Aviv
Mbachu, Israel	USA, Pennsylvania, Thorndale	Newman, Bobby	USA, Texas, Houston
Mbachu, Israel	Nigeria, Lagos	Nicolau, Bogdan	Romania, Constanta
McCabe, Mark	USA, New York, Rochester	Noeckel, Claus	Germany, Cuxhaven
McCabe, Mark	Columbia, Bogota	Nolan, Christopher	Ireland, County Kildare, Kilcullen
McCabe, Mark	Peru, Lima	Nolan, David	USA, New York, New York
McCabe, Mark	Paraguay, Asuncion	Northwood, Mark	Canada, Ontario, Markham
McCabe, Mark	Argentina, Buenos Aires	Novak, Denis	Slovenia, Ljubljana
McCabe, Mark	USA, New York, New York	Nyström, Björn	Sweden, Nacka (Stockholm)
McCabe, Mark	Uruguay, Montevideo	O' Carroll, Thomas	Canada, Ontario, Toronto
McCabe, Mark	Brazil, Sao Paulo	Obunai, Yoshio	Japan, Tokyo
McCabe, Mark	USA, Florida, Miami	Ofir, Jacob	Israel, Tel-Aviv
McCarty, Richard	USA, Florida, Pompano Beach	Okebukola, Johnson	Nigeria, Lagos
McClain, Eddy	USA, California, Glendora	Oliveira, Fernando	Portugal, Maia
McConnachie, John	Scotland-UK, Glasgow	Ono, Hiroyuki	Japan, Tokyo
McCormick, Charles	USA, Colorado, Breckenridge	Orozco, Andrea	USA, Colorado, Castle Rock
McDaniel, Gary	USA, Florida, West Palm Beach	Osborn, Colin	France, Pont l' Eveque
McGibbon, Douglas	South Africa, Midrand	Otsuka, Kazushi	Japan, Kobe City
McGough, Richard	USA, Illinois, Westchester	Ouloupis, Angelos	Cyprus, Nicosia
McGuinness, Brian	USA, Florida, Miami	Owusu-Twumasi, Bernard	Ghana, Accra

Ozturk, Mesut	Turkey, Izmir	Röglin, Harald	Germany, Wickede
Pacifici, Arnaldo	Italy, Rome	Romano, Richard	USA, Utah, Salt Lake City
Palladino, Jack	USA, California, San Francisco	Romano, Marco	Italy, Bergamo
Palmer, Robert	USA, Arizona, Prescott	Romano, Umberto	Italy, Bergamo
Palmer, Michele	USA, Arizona, Phoenix	Romero, James "Chip"	USA, Louisiana, Lafayette
Pan, Bo	China, Shanghai	Rompotis, Andonios "Tony"	Australia, Western Australia, Osborne Park
Pandit, Virendra	India, New Delhi	Rood, Wilson	Dominican Republic, Santo Domingo
Pandya, Purnima	India, Bombay (Mumbai)	Rosa, Oscar	Spain, Madrid
Paoletti, Alberto	Italy, Florence	Ross, Ian	England-UK, Manchester - Greater, Manchester
Paonessa, Joseph	USA, North Carolina, Charlotte	Ruch, Hans	Switzerland, Bern
Pastuszka, Bartosz	Poland, Warsaw	Rule, David	Singapore, Singapore
Pavek, Ladislav	Czech Republic, Prague	Rumore, Michael	Australia, New South Wales, Sydney
Peña, Jose	USA, New York, Long Island City	Ruskin, Thomas	USA, New York, New York
Pendleton, Robert	USA, Mississippi, Jackson	Russo, Rosario	Italy, Milan
Pendleton, Raymond	USA, Louisiana, New Orleans	Rusu, Dan	Romania, Pantelimon
Perdigão, Paulo	Portugal, Lisbon	Ryffel, Philip	Switzerland, Zürich
Perez Urrego, Andres	Colombia, Bogota	Sabro, Eyal	Israel, Rishon Lezion
Perrin, Anne	France, Paris	Sachse-Burger, Hannelore	Germany, Aschaffenburg
Pertuso, Robert	USA, Michigan, Grosse Pointe Farms	Salaria, Swran	India, Andheri
Perumal, Felix	Sri Lanka, Colombo	Salbu, Hans	Norway, Bergen
Peschel, Lutz	Germany, Dresden	Saleh, Laila	Egypt, Cairo
Peters, Susan	USA, Washington, Spokane Valley	Sandu, Ion	Romania, Bucharest
Peterson, Susan	USA, New York, New York	Sanmartin Cotti, Hugo	Spain, Barcelona
Petrovsky, Cliff	USA, Arizona, Prescott	Sanmartin Olivier, David	Spain, Barcelona
Pierce, Pamela	USA, California, San Rafael	Sanz-Guijarro, Miguel	Spain, Madrid
Pimentel Moralo, Jose	Spain, Madrid	Saponaro, Joseph	USA, New York, New York
Pimple, Natasha	India, Bombay (Mumbai)	Sarkis, Sue	USA, California, Glendale
Pimple, Mohanrao	India, Bombay (Mumbai)	Sarobba, Alessandro	Italy, Genoa
Pimple, Ramesh	India, Bombay (Mumbai)	Savala, Nick	USA, California, Rancho Cucamonga
Pinck, Charles	USA, District of Columbia, Washington	Schafferius, Keith	Australia, Queensland, Brisbane
Pintilie, Claudiu-Gabriel	Romania, Bucharest	Schalke, Aad	Netherlands, Breda
Piredda, Gavino	Italy, Bologna	Scheiber, Wolfgang	Germany, Frankfurt
Plummer, Malcolm	USA, New York, Syracuse	Scherbenev, Alexey	Russia, Novosibirsk
Poindexter, Carlyle	USA, North Carolina, Raleigh	Schmid, Peter	Germany, Munich
Polak, Stephen	USA, California, Beverly Hills	Schmitt, Jean	France, Paris
Ponder, Marlene	USA, California, North Hollywood	Scholl, Bodo	Germany, Hamburg
Ponzi, Luciano	Italy, Verona	Schopf, Karl	Austria, Vienna
Ponzi, Luciano	Italy, Brescia	Schuerger, Reinhardt	USA, California, Beverly Hills
Potau, Cristina	Spain, Barcelona	Schuster, Scott	USA, New York, Albany
Potau, Cristina	Portugal, Porto	Schwartz, Mary	USA, Utah, Salt Lake City
Potau, Cristina	Spain, Madrid	Scopelliti, Vincenzo	Australia, Victoria, Carlton
Potter, Edward	England-UK, Greater Manchester, Bolton	Scott, Greg	USA, North Carolina, Greensboro
Preece, John	England-UK, West Midlands, Birmingham	Senn, Daniel	Switzerland, Zurich
Preining, Andreas	Austria, Linz	Sessler, Steven	USA, Florida, Miami
Rabern, Michael	USA, Arizona, Scottsdale	Shah, Jignesh	India, Rajkot
Rabern, W. David	USA, Arizona, Scottsdale	Shalov, Stephen	USA, California, Agoura Hills
Rahav, Raphael	Israel, Ra'anana	Shamshak, Thomas	USA, Massachusetts, Boston
Rajagopal, Seshadri	India, Bombay (Mumbai)	Sharma, Capt. Santosh	India, Bombay (Mumbai)
Rambam, Steven	USA, New York, Brooklyn	Sharma, Mahesh	India, New Delhi
Rambousek, Heinz	Austria, Vienna	Shchepin, Evgeniy	Russia, Tatarstan
Ramirez, Thierry-Enrique	France, Istres	Shedden, Edward	USA, Florida, Cape Coral
Ramsauer, Georg	Austria, Salzburg	Shelmerdine, Darren	England-UK, Manchester - Greater, Manchester
Ramsauer, Georg	Germany, Bayerisch Gmain	Shelmerdine, Eric	England-UK, Lancashire, Blackpool
Rangotis, Jaroslaw	Poland, Warsaw	Shevach, Samuel	Israel, Tel-Aviv
Rapone, Rodolfo	Italy, Prato	Shinkowsky, John	USA, Pennsylvania, Harrisburg
Raschke, Rolf	Germany, Bielefeld	Shirin, Yair	Israel, Tel-Aviv
Ratanavichai, Sanong	Thailand, Bangkok	Shmagaylo, Alexander	Ukraine, Sevastopol
Ravee, Captain	India, New Delhi	Sideris, Christian	Switzerland, Geneva
Rechetnik, Vyacheslav	Russia, Kazan	Siedow, Vicki	USA, California, La Crescenta
Reese, Gregory	USA, California, Newport Beach	Silvers, Barry	USA, Florida, Deerfield Beach
Reilly, Thomas	USA, New York, New York	Silvers, Barry	USA, Florida, Boynton Beach
Reinecke, Liane	Germany, Panketal bei Berlin-Buch	Simon, Andreas	Germany, Siegburg
Renger, Michael	Austria, Vienna	Simonian, Guy	USA, Connecticut, Newington
Restino, Antonino	Italy, Naples	Singh, Shivindra Pratap	India, Ahmedabad
Reyes-Arias, Jose	Dominican Republic, Santiago	Singh, Shivindra Pratap	India, Secunderabad
Reynolds, Chris	USA, California, Santa Rosa	Singh, Shivindra Pratap	India, New Delhi
Ribacoff, Daniel	USA, New York, Oceanside	Singh, Kiran Pal	India, Ankleshwar
Ribeiro, J. Morgado	Portugal, Lisbon	Singh, Kunwar	India, New Delhi
Ricci, Dawn	USA, Nevada, Las Vegas	Singh, Ajit	India, New Delhi
Ricci, Dawn	USA, New Jersey, Freehold	Singh, Ram Niwas	India, Bombay (Mumbai)
Ricci, Dawn	USA, New York, New York	Singh, Shivindra Pratap	India, Bangalore, Karnataka
Riess, Jens	Switzerland, Erlenbach	Siske, Joseph	USA, North Carolina, Arden
Ripa, Kevin	Canada, Alberta, Calgary	Sivan, Aaron	Israel, Tel-Aviv
Rivera, Roberto	USA, California, Santa Clara	Sivanandhan, Dhanushkodi	India, Maharashtra, Mumbai
Robinson, Paul	England-UK, London-Greater, London	Slagowski, John	USA, Delaware, Wilmington
Robles, Jesse	USA, California, Rancho Cordova	Smaragdakis, John	USA, New York, New York
Robson, Julia	Australia, Victoria, North Melbourne	Smith, Nichols	USA, California, San Francisco
Rocca, Fernando	Italy, Genoa	Smith, Dick	England-UK, Avon, Bristol
Rodriguez, Josafath	USA, California, Salinas	Smith, Sterling	USA, Texas, San Antonio

Smith, Robert	England-UK, Lancashire, Ormskirk	Vinson, Joseph	USA, Louisiana, New Orleans
Smothers, Raymond	USA, California, Gold River	Voitsekhovski, Anatoly	Russia, Moscow
So, Che-Ying	Hong Kong, Hong Kong	Vold-Burgess, Spencer	England-UK, London - Greater, London
Soistier, Vincent	Brazil, Rio de Janeiro	Volkov, Andrey	Russia, Saint Petersburg
Sokalski, Norman	USA, California, Moraga	Vyas, Mukesh	India, Gujarat, Vadodara
Solomanidin, Vladimir	Russia, Moscow	Waddell, Michael	Australia, Western Australia, East Victoria Park
Solomanidin, Alexey	Russia, Moscow	Wadhawan, Subhash	India, New Delhi
Sonne, Warren	USA, New York, New City	Wakiyama, Daisuke	Japan, Tokyo
Soto, Zoraida Karina	Guatemala, Guatemala City	Wall, Charles	USA, California, San Jose
Spohn, Carter	USA, California, Claremont	Wallace, Lisa	USA, California, Santa Cruz
Stansbury, Steven	USA, Florida, Jacksonville	Warkentine, David	USA, Nevada, Laughlin
Stearman, Jeffrey	USA, California, Fullerton	Watts, Frank	USA, Michigan, Fenton
Stefanova, Antonia	Bulgaria, Varna	Webb, Kenneth	USA, Illinois, Matteson
Stein, Martin	Germany, Cologne	Webb, Bette	USA, Arizona, Phoenix
Stekelenburg, Norma	Netherlands, Breda	Webb, Larry	USA, Arizona, Phoenix
Stekelenburg, Jan	Netherlands, Breda	Weber, Joern	Germany, Mönchengladbach
Stelikos, Nikos	Cyprus, Limassol	Webster, Christopher	USA, California, Burlingame (San Francisco)
Stelzer, Peter	Switzerland, Zurich	Wei, He "Jack"	China, Shanghai
Stephens, Basil "Steve"	USA, California, Beverly Hills	Weiss, Melvin	USA, Florida, Miami
Stepnov, Serguei	Russia, Nahabino	Welch, Emmanuelle	USA, New York, Brooklyn
Stoltidis, Alex	Greece, Athens	Westbye, Gard	Norway, Oslo
Strandman, Bo	Sweden, Stockholm	Whitaker, Tad	USA, California, San Francisco
Stuto, Philip	USA, California, La Quinta	Whitehouse, Roy	Portugal, Gambelas
Suastegui, Rafael	Mexico, Tijuana	Whitehouse, Roy	England-UK, London - Greater, London
Sulaiman, Dato Mohd	Malaysia, Kuala Lumpur	Wilcox, C. Tim	USA, Indiana, Indianapolis
Sullivan, David	USA, California, Berkeley	Willenbrink, Stefanie	Germany, Berlin
Sullivan, David	Brazil, Rio De Janeiro	Willenbrink, Matthias	Germany, Berlin
Suzuki, Kunio	Japan, Tokyo	Williams, Jeffrey	Philippines, Makati City
Szaruga, Krzysztof	Poland, Lodz	Wilmink, Rolf	Germany, Plettenberg
Szell, James	USA, Ohio, Cleveland	Wilson, Andy	USA, Tennessee, Memphis
Takada, Yukie	Japan, Nagoya City	Wilson, Virgil	USA, Oregon, Eugene
Takahama, Miharu	Japan, Tokyo	Winkelmann, Roy	USA, Florida, Venice
Tal, Candice	USA, California, Santa Clara	Wippermann, Eveline	Germany, Bielefeld
Tal, Johnathan	USA, California, San Jose	Wiseman, Kal	Canada, Quebec, Morin Heights
Talaganis, John	USA, California, Long Beach	Wizman, Asher	Israel, Tel-Aviv
Tam Kwok Hung, William	Hong Kong, Hong Kong	Wong, Benedict	Hong Kong, Kowloon
Tan, Marcus	Singapore, Singapore	Wong, Yoh	Hong Kong, Hong Kong
Tan, Vincent	Singapore, Singapore	Wood, Neil	Australia, Victoria, Noble Park
Tan, KB	Singapore, Singapore	Wood, John	USA, Hawaii, Kamuela
Tanase, Vasile	Romania, Bacau	Woodward, John	Zimbabwe, Kopje, Harare
Tavazzi, Elisabetta	Italy, Milan	Worm, Ole	Denmark, Copenhagen, Frederiksberg
Taylor, George	USA, Georgia, Marietta	Wright, Susie	USA, California, Tehachapi
Taylor, Kenneth	USA, North Carolina, Chapel Hill	Wright, Michael	England-UK, London - Greater, London
Telles, Thomas	USA, California, San Diego	Wunderlich, A. Dale	USA, Colorado, Castle Rock
Thibault, Darryl	USA, California, San Diego	Xu, Jun	China, Hubei Province, Wuhan
Thielen, Harry	USA, California, Huntington Beach	Yaar, Doron	Israel, Tel-Aviv
Thomas, Graham	Cyprus, Nicosia	Yadav, Radheyshyam	India, Gujarat, Ahmedabad
Thompson, Josiah	USA, California, Bolinas	Yamazumi, Yoshikazu	Japan, Tokyo
Thompson, Daniel	New Zealand, Auckland	Yang, Hai	China, Beijing
Thompson-Toresen, Daniel	New Zealand, Auckland	Yeung, Frederic	French Polynesia, Tahiti, Papeete
Thornton, Christopher	USA, Illinois, Blue Island	Youngs, Michael	USA, Florida, Miami
Tobias, Melvin	USA, California, Burlingame	Yung Chuen, Chan	Hong Kong, Kowloon
Todea, Ioan	Romania, Bucharest	Zakyntinos, Spyro	Greece, Volos
Toledano, Shaul	Israel, Haifa	Zalewski, Zenon	Poland, Łódź
Tomczyk, Mirosław	Poland, Kolobrzeg	Zelensov, Vladimir	Russia, Moscow
Torgerson, Randy	USA, Montana, Kalispell	Zhang, Dajiang	China, Beijing
Torrance, Jack	USA, California, San Pedro	Zheng, Ken	China, Shanghai
Torres, Manuel	Spain, Canary Islands	Zheng, Frank	China, Guangdong Province, Shenzhen
Trasorras, Rene	USA, Florida, Brandon	Ziegler, Mario-Paul	Spain, Santiago De Compostela
Tronci, Antonio	Italy, Cuneo	Zimin, Oleg	Russia, Balashikha, Moscow
Tumlucali, Ahmet	Turkey, Istanbul	Zimmer, Jim	USA, California, San Juan Capistrano
Tyagi, Rajkumar	India, Ahmedabad	Zinkus, Anthony	USA, Arizona, Tucson
Tymofeyev, Igor	Ukraine, Kiev	Zocca, Mauro	Italy, Asti
Tyndall, Tawni	USA, California, Granada Hills	Zollinger, Edgar	Switzerland, Horgen
Tzaut, Jaques	Switzerland, Vufflens-le-Chateau	Zwonitzer, Walter	USA, California, Long Beach
Uchida, Hiroki	Japan, Osaka		
Ullly, Albin	Austria, Graz		
Ustimenko, Serghei	Moldova, Kishinev		
Van Beek, Verdi	New Zealand, Christchurch		
van Leeuwen, Bernardus	Aruba, Oranjestad		
van Leeuwen, Bernardus	Curacao, Willemstad		
Van Zwiennen, Gert	Netherlands, Heerhugowaard		
Vanacore, Derek	USA, California, El Dorado Hills		
Verboom, Jacob	Netherlands, Ka Lelystad		
Verma, Major (Retd.) L.D.	India, Secunderabad		
Vermaat, Jan Willem	Netherlands, Zuidland		
Villena Barjau, Carina	Spain, Barcelona		
Vincent, Bill	USA, Illinois, Chicago		
Vinson, Christine	USA, Louisiana, New Orleans		

Probationary Members

Ambrosino, Luigi	England, London
Bajwa, Mandeep	India, Punjab, Mohali, SAS Nagar
Ishak, Wan Zairi	Malaysia, Kuala Lumpur
Koerberlein, Ernest	USA, California, Monrovia
Merkel, Pierre	USA, California, San Francisco
Naustdal, Stein	Norway, Oslo
Salfen, Cody	USA, California, Los Gatos
Salvisberg, Roland	Switzerland, Zug
Vanslambrouck, Sophie	Belgium, Gooik

900 W.A.D MEMBERS

SPREAD OVER 75 COUNTRIES

guided by our Code of Ethics

AS MEMBERS OF WORLD ASSOCIATION OF DETECTIVES, INC.

We share a singular responsibility for maintaining the integrity and trust of the private detective or investigative profession. In discharging this responsibility, we mutually pledge that:

I

We will endeavour to perform our professional duties in accordance with the highest moral principles.

II

We will direct our concerted efforts toward the support, advancement, elevation, and furtherance of high personal and professional conduct in the pursuance of business in our own communities, our respective countries, and with our fellow members wherever they may be.

III

We will strive to strengthen the membership by selecting and approving for membership only those individuals qualified personally and professionally and whose business operations are conducted in an honest and legitimate manner.

IV

We will be faithful and diligent in carrying out assignments entrusted to us, and to determine the true facts and render honest, unbiased reports in reference thereto.

V

We will respect the best interests of our clients by maintaining a high standard of performance and reporting to our clients the full facts ascertained as a result of the work and effort expended whether they be advantageous or detrimental to the interest of the client; and that nothing be withheld from the client save by the dictates of law.

VI

We will at all times perform our duties within the bounds of the law and will not permit nor demand of any employee nor fellow member any violation of the law or any manner of fraud.

VII

We will labour diligently and unceasingly to elevate the standard of practices of our agency members and will not tolerate unscrupulous invasion of our business contracts with clients by any member who intrudes knowingly and wilfully for his own private advantage or financial gain to the detriment and/or injury of another member.

VIII

We will promote and protect the interest of our fellow members, and all members of the profession having knowledge of any unlawful or unprofessional practices of any other member shall immediately inform the Association thereof so that disciplinary action may be taken.

IX

We will further an honest and legitimate manner of operation and will preserve a client's confidence beyond the term of employment of any private detective, investigator, or other employee; and other employment will not be accepted which involves the disclosure or use of the confidences either for the private advantage of the member or his employees, or to the disadvantage of the client without his knowledge and consent, even though there may be other available sources of information.

X

We will respect the rights of our clients and refrain from divulging information to newspapers or other publications in the protection of our clients and to prevent interference in the administration of justice or a fair trial in the courts.

XI

We will refrain from using unprofessional media for advertising or by personal communications or interviews that fail to qualify in professional capacity and fidelity to trust.

XII

We will avoid controversies with fellow members concerning compensation by using some form of written agreement or letter which shall state terms or fees as agreed upon by both parties. At all times, we will remember that the private investigator/detective business is a profession and all financial dealings with clients should be handled on that basis; and that a private detective or investigator should accept no compensation, commission, rebate or other advantage from others without the knowledge and consent of his client. If necessary, we may resort to the courts to prevent injustice, imposition, or fraud.

XIII

We will promote programs with educational intent designed to raise standards, improve efficiency, and increase effectiveness of the private investigator/detective profession.

XIV

We will work together toward the achievement of the professional objectives of the Association.

XV

We will observe strictly the precepts of truth, accuracy and prudence.

ARGENTINA

BUENOS AIRES

Gabriel Fama (2009)

Fama
Av. Corrientes 5874, Piso 2, Depto. 5
1414 Buenos Aires, Argentina
Tel: +54-11-4854-1896
Fax: +54-11-4854-1896
gabriel@fama-web.com
http://www.fama-web.com

Juan Fama (2010)

ALBO
Hipólito Yrigoyen 1350 4º Of. F
Buenos Aires, Argentina
Tel: +54-11-4328-4000
Fax: +54-11-4953-6838
albo@fibertel.com.ar
http://www.albo.ws

Mark McCabe (1992)

McCabe Associates, Inc.
Edificio Laminar Plaza, Ing Butty 240, 4 Piso
Buenos Aires, Argentina C1001AFB
Tel: +54-11-4590-2360
Fax: +55-11-4590-2201
sholscher@mccabe1.com
http://www.mccabe1.com

ARUBA

ORANJESTAD

Bernardus van Leeuwen (2012)

Forensic Services Caribbean N.V.
Dominicanessenstraat 33, PO Box 5282
Oranjestad, Aruba
Tel: +297-745-3643
benno@forensic-caribbean.com
http://www.forensic-caribbean.com

AUSTRALIA

NEW SOUTH WALES

CASTLE HILLS

Malcolm Brammer (2012)

Integrity Risk Solutions
130 Gooraway Drive
Castle Hills, NSW, 2154, Australia
Tel: +61-4-18284639
Fax: +61-2-96344146
mj.brammer@bigpond.com
http://www.integrityrisksolutions.com

DRUMMOYNE

Lachlan Jarvis (2013)

Lyonswood Investigations and Forensic Group
204 Lyons Rd.
Drummoyne, NSW, 2047 Australia
Tel: +61-2-98196833
Fax: +61-2-98196300
lachlan@investigators.net.au
http://www.investigators.net.au

NEUTRAL BAY

Jonathan Creighton (2011)

Creighton Group Pty. Ltd.
PO Box 1456, Neutral Bay, NSW, 2089 Australia
Tel: +61-4-12901970
Fax: +61-2-99606755
jonathan@creighton.com
http://www.creightongroup.com.au

SYDNEY

Michael Rumore (1995)

Rumore & Associates
210 Victoria Rd., Ste. 8
Sydney, Gladesville, NSW, 2111 Australia
Tel: +61-2-98797999
Fax: +61-2-98165165
info@rumore.com.au
http://www.rumore.com.au

QUEENSLAND

BRISBANE

Ian Fairbrother (LIFE)

Southern Cross Investigations
PO Box 475
Brisbane, Kenmore,
QLD, 4069 Australia
Tel: +61-7-3374-0808
Fax: +61-7-3374-0808
info@southerncrossinvestigations.com.au
http://www.southerncrossinvestigations.com.au

Peter Harkin (2004)

International Detection
Services (IDS Group)
PO Box 13173,
George Street
Brisbane, QLD,
4003 Australia
Tel: +61-7-32105000
Fax: +61-7-32297323
peter@idsgroup.com.au
http://www.idsgroup.com.au

Keith Schafferius (LIFE)

PO Box 940,
Brisbane, Kenmore,
QLD, 4069 Australia
Tel: +61-418728771
Fax: +61-7-38789590
info@keithschafferius.com
http://www.keithschafferius.com

VICTORIA

BURNLEY

Mark Grover (1998)

Victorian Detective Services
PO Box 5155, Burnley,
VIC, 3121 Australia
Tel: +61-3-95721433
Fax: +61-3-95721633
mark@mpol.com.au
http://www.detectiveservices.com.au

CARLTON

Vincenzo Scopelliti (2011)

LKA Group
72 Faraday Street, Carlton,
VIC, 3053 Australia
Tel: +61-3-93403222
Fax: +61-3-93472200
vscopelliti@lkagroup.com.au
http://www.lkagroup.com.au

CARNEGIE

Ashley Mayne (2012)

Victorian Detective Services
1044 Dandenong Road
Carnegie, VIC, 3163 Australia
Tel: +61-3-95721433
Fax: +61-3-95721633
ashley.mayne@detectiveservices.com.au
http://www.detectiveservices.com.au

HAMPTON

Thomas Gannon (2002)

Victorian Investigation Bureau
Unit 1 / 458 Bluff Rd.
Hampton, VIC, 3188 Australia
Tel: +61-3-95531137
Fax: +61-3-95531136
vicib@bigpond.net.au
http://www.victorianinvestigationbureau.com.au

MELBOURNE

Craig Douglas (1983)

Nationwide Research Group P/L
PO Box 1, Bayswater
Melbourne,
VIC, 3153 Australia
Tel: +61-3-9759-7600
Fax: +61-3-9753-9610
craig@nationwide.net.au
http://www.nationwide.net.au

NOBLE PARK

Neil Wood (LIFE)

Global Credit Solutions Pty. Ltd.
PO Box 108,
11 Wardale Rd., Springvale
Noble Park, VIC, 3174 Australia
Tel: +61-3-9547 3299
Fax: +61-3-9562 3557
neil@gcs-group.com
http://www.gcs-group.com

NORTH MELBOURNE

Julia Robson (2011)

Online Investigations Pty. Ltd.
PO Box 489
North Melbourne,
VIC, 3051 Australia
Tel: +61-4-00638254
julia@onlineinvestigations.com.au
http://www.onlineinvestigations.com.au

WESTERN AUSTRALIA

EAST VICTORIA PARK

Michael Waddell (2011)

Around the Clock Investigations
1st Floor, 824 Albany Hwy.
East Victoria Park,
WA, 6101 Australia
Tel: +61-8-94723900
Fax: +61-8-94723400
michael@atci.com.au

OSBORNE PARK

Andonios "Tony" Rompotis (2011)

Australia Wide Investigations Pty. Ltd.
First Floor,
211 Main Street
Osborne Park,
WA, 6017 Australia
Tel: +61-08-93451570
Fax: +61-08-93451424
tony@awipl.com.au
http://www.awipl.com.au

AUSTRIA

GRAZ

Arthur Haefele (LIFE)

Int. Detektiv-Agentur A. Haefele
Kaiserfeldgasse 23
Graz, A-8010 Austria
Tel: +43-316-824482
Fax: +43-316-813865
detektei.haefele@utanet.at
http://www.detektiv-haefele.at

Albin Uilly (1994)

Uilly & Uilly Oeg
Josef Posch Str. 116
Graz, A-8052 Austria
Tel: +43-3-16571030
Fax: +43-3-16571403
office@ully.at
http://www.ully.at

LINZ

Andreas Preining (2001)

Detektivbüro Mag. A. Preining
Altstadt 22A
Linz, A-4010 Austria
Tel: +43-7-32777190
Fax: +43-7-32777146
preining.detektei@utanet.at

SALZBURG

Georg Ramsauer (LIFE)

Dr.Georg Ramsauer-Privatdetektiv
Goellstrasse 6
Salzburg
A-5081 Austria
Tel: +43-6246-74762
info@detektei-ramsauer.com
http://www.detektei-ramsauer.com

VIENNA**Bernhard Maier (2002)**

BM-Investigations E.U.
Sternngasse 3/2/6, Vienna, A-1010 Austria
Tel: +43-1-522-1372
Fax: +43-1-522-2771
office@bm-investigations.at
http://www.bm-investigations.at

Ing. Andreas Nehyba (2002)

Agency Xtrace
Kratzlgasse 3/1/10, Vienna, A-1190 Austria
Tel: +43-1-367-5318
Fax: +43-1-253-3033-7722
office@xtrace.at
http://www.xtrace.at

Heinz Rambousek (LIFE)

Detektiv Union,
Rambousek & Beran GmbH
Margaretenquertel 8
Vienna, A-1050 Austria
Tel: +43-1-581-1551
Fax: +43-1-581-1550
rambousek@detektivunion.at
http://www.detektivunion.at

Michael Renger (2001)

Detektivbüro Dipl.-Ing.
(FH) Michael Renger, MSc, CFE
Brigittenuaer Laende 156-158/Stiege 1/19
Vienna, A-1200 Austria
Tel: +43-1-968-1593
Fax: +43-1-968-1632
office@renger.at
http://www.renger.at

Karl Schopf (2003)

Detektivinstitut Karl Schopf
Sieveringer Strasse 135/21
Vienna, A-1190 Austria
Tel: +43-1-328-5411
Fax: +43-1-320-0951
office@schopf.co.at
http://www.detektivinstitut-schopf.at

BELGIUM**BRASSCHAAT****Michel De Kort (2000)**

de Kort & Partners bvba
Jacobuslei 49, Brasschaat, B-2930 Belgium
Tel: +32-36-653940
Fax: +32-36-653530
MDK@dekort-partners.eu
http://www.dekort-partners.eu

BRUSSELS**Jean-Pierre De Cuyper (LIFE)**

Wood International [De Cuyper Bros]
502 Avenue Louise, Brussels, 1050 Belgium
Tel: +32-2-6494488
Fax: +32-2-6494488
decuyper@skynet.be
http://www.decuyper.net

GROBBENDONK**Jan Claus (2008)**

Claus & Partners BVBA
Bannerlaan 40C, Grobbendonk, 2280 Belgium
Tel: +32-14-220800
Fax: +32-14-232500
jan.claus@claus-partners.eu
http://www.claus-partners.be

MECHELEN**Staf Joosen (2011)**

CCSI
Fazantenstraat 33.
Mechelen, B-2811 Belgium
Tel: +32-478-778457
Fax: +32-15-420237
staf.joosen@ccsi.be
http://www.ccsi.be

BERMUDA**HAMILTON****William Butterworth (2004)**

Caribbean Investigative Network Ltd.
PO Box HM1385, Hamilton, HM FX Bermuda
Tel: +1-441-292-2626
Fax: +1-441-292-8341
wnb@ibl.bm
http://www.carib.bm

Paul Field (2004)

Caribbean Investigative Network Ltd.
PO Box HM1385, Hamilton, HM FX Bermuda
Tel: +1-441-292-2626
Fax: +1-441-292-8341
carib@ibl.bm
http://www.carib.bm

BRAZIL**RIO DE JANEIRO****Vincent Soistier (2012)**

Interlira Risk Consultancy
Rue Sete de Setembro 92,
Sala 2105 - Centro - CEP
Rio de Janeiro, 20050-002 Brazil
Tel: +55-21-3617-8383
Fax: +55-21-3617-8384
vso@interlira.com
http://www.interlira.com

David Sullivan (1995)

Sullivan Associates International, LLC
Rua Da Quitanda, 67, Sala 501
Rio De Janeiro, Brazil 20011-030
Tel: +55-21-2224-3803
Fax: +55-21-2507-3813
Derrickgp@gmail.com
http://www.sullivanpi.com

SÃO PAULO**Robert Creswell (2002)**

Creswell & Associates Ltd.
Caixa Postal 42071, São Paulo
São Paulo, 04082-970 Brazil
Tel: +55-11-8339-9866
Fax: +55-11-5053-9718
robert@creswellsa.com
http://www.creswellassociates.com

Mark McCabe (1992)

McCabe Associates, Inc.
Avenida Angelica, 2530 - CJ.45,
Higienopolis, Sao Paulo, Brazil 01228-200
Tel: +55-11-3255-3361 x 23
Fax: +55-11-3255-3361 x 27
solutions@mccabe1.com
http://www.mccabe1.com

BULGARIA**VARNA****Antonia Stefanova (2009)**

WSO/Due Diligence International
Vazrazhdane 4, Plot 38, Post Station 27,
PO Box 16, Varna, 9027 Bulgaria
Tel: +359-52-511116
Fax: +359-52-510033
wso@net-bg.net

CAMEROON**YAOUNDE****Théophile Mevoula (2005)**

CIR Investigations
PO Box 4682 Yaounde, Yaounde, Cameroon
Tel: +237-7776-6981
Fax: +237-2201-1009
ciir2002@yahoo.fr
http://www.cirininvestigation.net

CANADA**ALBERTA
CALGARY****Amanda (Amy) Foggin (2011)**

CKR Global
3402 8th Street SE
Calgary, AB, T2G 5S7 Canada
Tel: +1-403-262-4545 x3229
Fax: +1-403-266-3827
amy.foggin@ckrglobal.com
http://www.ckrglobal.com

Kevin Ripa (2010)

Computer Evidence Recovery, Inc.
42219 Southland Crossing SW
Calgary, AB, T2J 7A6 Canada
Tel: +1-403-703-4846
Fax: +1-403-770-8158
kevin@computerpi.com
http://www.computerpi.com

LETHBRIDGE**Scott Forster (2006)**

High Level Investigation Consultants
PO Box 23022,
RPO St. Mike's
Lethbridge, AB, T1J 4P5 Canada
Tel: +1-403-738-0000
Fax: +1-403-738-5123
scott@highlevelinvestigation.com
http://www.highlevelinvestigation.com

BRITISH COLUMBIA**LANGLEY****Bernard Major (LIFE)**

Major Investigations Inc.
1350-235th Street
Langley, BC, V2Z 2Y4 Canada
Tel: +1-604-533-8414
Fax: +1-604-530-7134
bhmajor@shaw.ca
http://www.bernardmajor.com

VANCOUVER**Janet Helm (2013)**

Shadow Investigations Ltd.
71044 - 7921 120th St.
Vancouver, Delta, BC,
V4C 8E7 Canada
Tel: +1-604-696-2000
Fax: +1-604-696-2001
janet@shadowinvestigationltd.ca
http://www.shadowinvestigationltd.ca

Alfred Hermes (LIFE)

Mercury Service Inc.
PO Box 46196,
Station D
Vancouver, BC, V6J 5G5 Canada
Tel: +1-604-228-9993
Fax: +1-604-224-8682
ahmsi@telus.net

Ozzie Kaban (1989)

Kaban Protective Services Inc.
1657 Nanaimo St.
Vancouver, BC,
V5L 4T9 Canada
Tel: +1-604-251-2121
Fax: +1-604-251-2323
okaban@axionet.com
http://www.Kabanprotective.com

Mark Kusic (2013)

Kusic and Kusic Ltd.
142-757 West Hastings St., Ste. 631
Vancouver, BC,
V6C 1A1, Canada
Tel: +1-604-681-9988
Fax: +1-604-681-9988
mark@kusic.ca
http://www.kusic.ca

Robert Loncaric (2005)

National Investigation Services Ltd.
#575 - 1755 Robson St.
Vancouver, BC, V6G 3B7 Canada
Tel: +1-604-331-8255
Fax: +1-604-648-9603
robert_loncaric@investigationsservices.ca
http://www.investigationservices.ca

NOVA SCOTIA**HALIFAX****Fred Dehmel (2006)**

CSI Investigations
102 Chain Lake Dr., Unit 1E
Halifax, NS, B35 1A7 Canada
Tel: +1-902-4500697
Fax: +1-902-484-5379
fdehmel@csiinvest.com
http://www.csiinvest.com

Craig MacMullen (1995)

Craig Investigations Inc.
PO Box 128
Centreville (Halifax),
NS, B0P 1J0 Canada
Tel: +1-902-670-5888
Fax: +1-902-679-0559
cmac@xcountry.tv
http://www.craiginvestigations.com

ONTARIO**HAMILTON****Martin Jaekel (2012)**

Whitehall Bureau of Canada
944 South Service Road
Hamilton, ON, L8E 6A2 Canada
Tel: +1-905-643-3233
Fax: +905-643-8336
martin@whitehallcanada.com
http://www.whitehallcanada.com

MARKHAM**James Morris (2007)**

PII Private Investigations International, Inc.
3601 Highway #7, East, Ste. 400
Markham, ON, L3R-0M3 Canada
Tel: +1-905-944-9092
Fax: +1-905-944-9095
jim@pii-inc.ca
http://www.pii-inc.ca

Mark Northwood (2005)

Northwood & Associates Inc.
50 Mcintosh Drive, Ste. 207
Markham, ON, L3R 9T3 Canada
Tel: +1-416-444-4610
Fax: +1-416-444-5841
research@northwood-pi.com
http://www.northwood-pi.com

OAKVILLE**Robert Brockbank (1998)**

R. T. Brockbank & Associates Inc.
220 Wyecroft Rd., Ste. 203
Oakville, ON, L6K 3V1 Canada
Tel: +1-905-844-0028
info@brockbankpi.com
http://www.brockbankpi.com

TORONTO**John Barnes (LIFE)**

26 Tilson Rd.
Toronto, ON, M4S1P4 Canada
Tel: +416-485-5709
jcbarnes7@bell.net

Tamara Caldwell (2010)

Enviro-Lynx Investigations
#42 - 3341 Bloor Street West
Toronto, ON, M8X 1E9 Canada
Tel: +1-416-234-8658
Fax: +1-416-234-5403
enviro-lynx@rogers.com
http://www.enviro-lynx.com

Don Colbourn (1995)

Integra Investigation Services Ltd.
240 Galaxy Blvd.
Toronto, ON, M9W 5R8 Canada
Tel: +1-416-798-8588
Fax: +1-416-798-8539
dcolbourn@integrapi.com

Thomas O' Carroll (2001)

Commissionaires Great Lakes,
c/o Director of Investigations
80 Church Street
Toronto, ON, M5C 2G1 Canada
Tel: +1-416-364-4496 x256
Fax: +1-416-364-5395
tomo@commissionaires.ca
http://www.commissionaires.ca

WATERLOO**Earl Basse (2003)**

Basse & Associates Inc.
55 Northfield Drive, East, Ste. 187
Waterloo, ON, N2K 3T6 Canada
Tel: +1-519-501-3636
Fax: +1-519-578-5607
ebasse@rogers.com

QUEBEC**LAVAL****Jean Collin (2012)**

Forensik
2436 Industriel Blvd.
Laval, Quebec,
H7S 2G7 Canada
Tel: +1-450-786-2243
Fax: +1-514-221-3507
jean.collin@forensik.ca
http://www.forensik.ca

MONTREAL**Michel Hamel (2012)**

GW C&I (A Garda World Company)
1390 Barre St.
Montreal, QC, H3C 1N4 Canada
Tel: +1-514-281-2811
Fax: +1-514-935-3182
mhamel@garda.ca
http://www.gardaglobal.com

Remi Kalacyan (2006)

VIP Investigations, Inc.
83 St-Paul West
Montreal, QC, H2Y 1Z1 Canada
Tel: +1-514-238-8847
remi@spyvip.com
http://www.spyvip.com

Louis Laframboise (1991)

GW C&I (A Garda World Company)
1390 Barre St.
Montreal, QC, H3C 1N4 Canada
Tel: +1-514-281-2811 x2150
Fax: +1-514-935-3182
louis.laframboise@garda-world.com
http://www.garda-world.com

MORIN HEIGHTS**Kal Wiseman (LIFE)**

IBI Security
88 Legault Street
Morin Heights, QC, JOR 1H0 Canada
Tel: +1-450-226-2921
Fax: +1-514-744-5494
kalwiseman@sympatico.ca

SASKATCHEWAN**HUMBOLAT****Sandor Demeter (1996)**

Demeter Investigations
PO Box 42
Humbolat, SK, S0K 2A0 Canada
Tel: +1-306-682-1632
Fax: +1-306-682-5121
sldemeter@sasktel.net

CHINA**BEIJING****Jack Chu (2010)**

RA Consultants Ltd.
Room A1702, Vantone New World Plaza,
No.2 Fuchngmenwai Street, Xicheng District
Xicheng District, Beijing 100037 China
Tel: +8610-6804 6290
Fax: +86-10-6804 6292
jack.chu@ra.com.hk
http://www.ra.com.hk

Theodore Kavowras, Jr. (2003)

Panoramic Consulting Ltd.
Beijing, China
Tel: +852-2838-0331
Fax: +852-2975-8973
Ted@Panoramicconsulting.com
http://www.panoramicconsulting.com

Guorong Li (2007)

SINOFAITH IP Group
Room 7024,
Beijing International Convention Center
No. 8 Beichendong Road,
Chaoyang District
Beijing, 100101 China
Tel: +86-10-84979882
Fax: +86-10-64991919
guorong.li@sinofaith-ip.com
http://www.sinofaith-ip.com

Changjiang Liu (2004)

Beijing Orient Business Investigation Co. Ltd.
Room 21c, Shengjin Tower,
Lianbao Road, Fengtai District
Beijing, 100161 China
Tel: +86-10-63959393
Fax: +86-10-63993989
info@pichina.com
http://www.pichina.com

Wei Liu (2011)

China Security & Protection Co., Ltd.
10/F, Mylin Tower,
Gongti Donglu Chaoyang District
Beijing, 100027 China
Tel: +86-10-85120051
Fax: +86-10-85120061
csp@cspb.com
http://www.cspb.com

Wendy Liu (2011)

China RiskFree Investigation
& Consulting Company, Ltd.
Room D9-503, Great Wall International,
No. 323, Tongchao Ave.
Tongzhou District, Beijing, 101121 China
Tel: +86-10-52996612
Fax: +86-10-59458651
wendy.liu@riskfreecn.com
http://www.riskfreecn.com

Hai Yang (1999)

Beijing Steele Business
Investigation Center (SBCS)
Room 1310, Bldg.K, Huiyuan Apt.
Asian Games Village
Chaoyang District, Beijing, 100101 China
Tel: +86-10-84972819
Fax: +86-10-84984754
steele@sbc.com.cn
http://www.china-investigation.com

Dajiang Zhang (2010)

Tianchao Business Investigation Co., Ltd.
Room 1802, Bldg. C-1, Sun Plaza,
Asian Games Village
Chaoyang District, Beijing, 100101 China
Tel: +86-10-64922828
Fax: +86-10-64899259
master@tianchao.com.cn
http://www.investigation-china.com
or www.tianchao.com.cn

HEFEI**Yingsong Fang (2011)**

Anhui Business Consulting Services Co., Ltd.
Yaohaou, SuiXi Road,
Lanting garden area,
yipin family,
no.5 floor, 1103 room, wang li
Hefei, Anhui Province,
230041 China
Tel: +86-551-7126628
ahbyzt@126.com or 496987929@qq.com
http://www.bydzdt.com

GUANGZHOU**Theodore Kavowras, Jr. (2003)**

Panoramic Consulting Ltd.
Guangzhou, China
Tel: +852-2838-0331
Fax: +852-2975-8973
Ted@Panoramicconsulting.com
http://www.panoramicconsulting.com

GUIYANG CITY**De Chen (2013)**

Guizhou Fengheng
Business Consulting Co., Ltd.
Room 911, Keji Tower, No. 145,
Beijing Road, Yunyan District,
Guiyang city, Guizhou province, China
Tel: +86-851-6821703
Fax: +86-851-6821703
gzfhdc@126.com
http://www.gzfhdc.com

SHANGHAI**Jack Chu (2005)**

RA Consultants Ltd.
Room 1106,
Jingan China Tower,
1701 Beijing Road West,
Jingan District
Shanghai 200040 China
Tel: +8621-6288 4861
Fax: +8621-6288 4863
jack.chu@ra.com.hk
http://www.ra.com.hk

Theodore Kavowras, Jr. (2003)

Panoramic Consulting Ltd.
Shanghai, China
Tel: +852-2838-0331
Fax: +852-2975-8973
Ted@Panoramicconsulting.com
http://www.panoramicconsulting.com

Bo Pan (2009)

Pacific Strategies & Assessments
11C, New Century Plaza, No. 188
Wujiang Road, Jing'an District
Shanghai, 200041 China
Tel: +86-21-61498275
Fax: +86-21-61498174
peter.pan@psagroup.com
http://www.psagroup.com

He "Jack" Wei (2011)

SDE Information Consulting Co., Ltd.
Room 3302, Bldg. 8,
No. 1515, Zhangyang Rd.,
Pudong New Area
Shanghai, 200135 China
Tel: +86-21-5885-2005
Fax: +86-21-6855-5391
sde@sde007.com
http://www.sde007.com

Ken Zheng (2011)

Junction IP Consulting Co., Ltd.
Shanghai Postbox 002-009
Shanghai, 200002 China
Tel: +86-21-61550667
ken@junctionip.com
http://www.junctionip.com

SHENZHEN**Jack Chu (2005)**

RA Consultants Ltd.
Ste. M, 12/F, Ming Shang Ge,
Shen Gang Garden,
No. 2078 Bao An (S) Road
Shenzhen, 518001 China
Tel: +86755 2585 7767
Fax: +86755 2585 7782
jack.chu@ra.com.hk
http://www.ra.com.hk

Theodore Kavowras, Jr. (2003)

Panoramic Consulting Ltd.
Shenzhen, China
Tel: +852-2838-0331
Fax: +852-2975-8973
Ted@Panoramicconsulting.com
http://www.panoramicconsulting.com

Zhong Ren (Louis) Liu (2005)

Shenzhen Factuality Business
Investigators Co., Ltd. (China)
21d, Li Mei Ge,
Xiang Li Bldg.,
Lian Hua Road, Fu Tian District
Shenzhen, Guangdong Province,
518034 China
Tel: +86-755-8393-6528
Fax: +86-755-8393-6538
zrlouis@hotmail.com
http://www.pi-detective.com

Frank Zheng (2010)

Keen Risk Solution Co., Ltd.
16B Haijing Square, Nanshan District
Shenzhen City,
Guangdong Province
518000 China
Tel: +86-755-26451071
Fax: +86-755-86031850
Frank@keen-rs.com
http://www.keen-rs.com

WUHAN**Jun Xu (2013)**

Hubei Ming Sheng
Business Investigations Co. Ltd.
Room 2306,
Peng Cheng Guo Ji Tower B,
Luoshi Road, Wuchang District,
Wuhan, Hubei Province,
430000 China
Tel: +86-27-87873347
Fax: +86-27-51763187
server@hbms.cn
http://www.hbms.cn

XIAMEN**Wei He (2010)**

CHAR Economic Information
Consulting Co. Ltd.
No. 488, Jiahe Rd., the No. 3 Bldg.,
Room 1203, Yi Lu
Xiamen City,
Fujian Province, China
Tel: +86-059-2-5682110
Fax: +86-059-2-5682110
cer007@126.com
http://www.cer007.com

XIANGTAN**Xiaoming Liu (2009)**

Ming Jing Business Investigation
Room 3-201, Building No.5,
Yiyuan Garden,
No.11 Shaoshan East Road,
Yuhu District
Xiangtan City, Hunan Province,
411100 China
Tel: +86-0731-88941007
Fax: +86-0731-88941007
xtmj007@163.com
http://www.hnmj007.com

COLUMBIA**BOGOTA****Mark McCabe (1992)**

McCabe Associates, Inc.
Calle 100 #8A-55, Piso 10 - Torre C
Bogota, Columbia
Tel: +57-1-638-6439
Fax: +57-1-621-1565
solutions@mccabe1.com
http://www.mccabe1.com

Andres Perez Urrego (2012)

Agencia Superior de Investigacion
Avenida Calle 72, No 91 A 17 Oficin 202
Bogota, 11001, Colombia
Tel: +57-1-478-7395
Fax: +57-320-423-0337
wad@detectivescolombia.com
http://www.detectivescolombia.com

COSTA RICA**SAN JOSE,****Seth Derish (1986)**

Costa Rica Investigations, SA
San Jose, Costa Rica
Tel: +1-415-648-7007 Toll free from U.S.
Fax: +1-506-2269-8659
Seth@privateeyes.com
http://www.privateeyes.com

CURACAO**WILLEMSTAD****Bernardus van Leeuwen (2010)**

Forensic Services Caribbean N.V.
PO Box 8142, Willemstad, Curacao
Tel: +599-9-4617974
Fax: +599-9-4617905
benno@forensic-caribbean.com
http://www.forensic-caribbean.com

CYPRUS**LIMASSOL****Effie Georgiou (2011)**

Cyprus Detectives
EK Private Eye Private Investigations
PO Box 71027, Limassol, CY-3840 Cyprus
Tel: +357-70001616
info@cyprusdetectives.com
http://www.cyprusdetectives.com

Angelos Ouloupis (1998)

Avantes D & S Co. Ltd.
3 Spartis
Anagia-Nicosia, 2640 Cyprus
Tel: +357-22370140
Fax: +357-22371860
detectivesecurity@avantes.com.cy
http://www.avantes.com.cy

Graham Thomas (2009)

Rime Information Bureau Ltd.
302 Athenitis Building,
8 Kennedy Ave.
Nicosia, 1680 Cyprus
Tel: +357-22768662
Fax: +357-22768660
groupsales@rimeib.com
http://www.rimeib.com

Nikos Stelikos (2008)

Melivia Investigations Company Ltd.
60 Thessalonikis Str. P
Limassol, CY-3025 Cyprus
Tel: +357-25331122
Fax: +357-25870055
melinv@cytanet.com.cy
http://www.melivia.eu

CZECH REPUBLIC

PRAGUE

Michal Drabek (2006)

Daston
Na lysinach 20
Prague, 14700 Czech Republic
Tel: +420-723-858388
Fax: +420-226-015757
info@daston.eu
http://www.daston.eu

Ladislav Pavek (2003)

Siais S.R.O.
Vratislavská 394
Prague, 18100 Czech Republic
Tel: +420-233-541975
Fax: +420-233-541975
ladpavek@volny.cz
http://www.siais.cz

DENMARK

COPENHAGEN

Claus Jensen (LIFE)

Nyelandsvej 49 St. Tv.
Copenhagen, Frederiksberg,
2000 Denmark

FREDERIKSBERG

Ole Worm (2003)

Pi-Consult Investigation
And Security Denmark
Gl. Kongevej 164, 4 floor right
DK 1850 Frederiksberg C, Denmark
Tel: +45-70209905
Fax: +45-70209910
investigator@pi-consult.dk
http://www.pi-consult.dk

HOERSHOLM

Uffe Bodeholt (2005)

UIP Consult ApS Private Investigators
Sandbjergvej 11
Hoersholm, DK-2970 Copenhagen, Denmark
Tel: +45-70271710
Fax: +45-70271725
ub@uip-consult.dk
http://www.uip-consult.dk

DOMINICAN REPUBLIC

SANTIAGO

Jose Reyes-Arias (2013)

Jarasa Seguridad, s.r.l.
PO Box 426, Santiago de los caballeros
Santiago, Dominican Republic
Tel: +1-809-276-2503 or +1-809-276-2504
Fax: +829-947-6812
reyes_jose@hotmail.com
http://www.jarasaseguridad.org

Wilson Rood (2009)

Wilson A. Rood & Associates S.A.
Plaza Duarte #7, Ciudad Colonial
Santo Domingo, Dominican Republic
Tel: +1-809-440-1772
wilsonrood@gmail.com

EGYPT

CAIRO

Laila Saleh (2007)

TCM Egypt
37 Kasr Nil St., 2nd Flr.,
Flat No. 12, Downtown
Cairo, Egypt
Tel: +20-2-23934625
Fax: +20-2-23954280
tcmegypt@gmail.com
http://www.tcmegypt.com

FINLAND

HELSINKI

Stellan Kjellberg (2012)

Gothia Protection Group AB
Temppelekatu 8,
11100 Riihimäki Helsinki Finland
Helsinki Finland
Tel: +358-10 231 4990
info@gothiaprotection.se
http://www.gothiaprotection.se

TUUSULA

Risto Haataja (2012)

Oy Temigroup Nordic Ab
Kalliotie 2, Tuusula, 04360 Finland
Tel: +358-9-2316 9590
Fax: +358-9-3158 4361
risto@temigroup.eu
http://www.temigroup.com

FRANCE

BEAUSOLEIL

Patrick Boffa (1996)

Patrick Boffa Investigations
3450 Avenue Prince Rainier III
06240 Beausoleil, France
Tel: +33-4-9378-1236
Fax: +33-4-9378-1236
info@boffadetective.com
http://www.boffadetective.com

DIJON

Joel Auribault (1996)

Agence Investigations sarl
3, Impasse St Pierre, 21000 Dijon, France
Tel: +33-3-8068-0168
Fax: +33-3-8068-0169
jra@agence-investigations.com
http://www.investigations.com

ISTRES

Thierry-Enrique Ramirez (2002)

Aguila Investigations
206, Av. Verger de Moise
les 4 vents, 13800 Istres, France
Tel: +33-6-7774-3727
aguila.invest@andorra.ad

JOUY EN JOSAS

Jean-Emmanuel Derny (2009)

Roche Investigations
2 Rue Jean Baptiste Huet
78350 Jouy en Josas, France
Tel: +33-1-3458-7235
derny@rocheinvestigations.fr
http://www.rocheinvestigations.fr

MARSEILLE

Charles Dmytrus (2000)

Cabinet Blanc, 69 Rue Saint-Ferreal
13006 Marseille, France
Tel: +33-4-9133-2181
Fax: +33-4-9133-0124
cabinetblanc@wanadoo.fr
http://www.cabinetblanc.fr

PARIS

Anne Perrin (2011)

Arca Conseil
12 Rue Saint Fiacre, 75002 Paris, France
Tel: +33-1-4026-8833
Fax: +33-1-4026-8830
anne.perrin@arca.fr
http://www.arca.fr

Jean Schmitt (1999)

Agence France Investigation
16, Rue Massenet, 75016 Paris, France
Tel: +33-1-4288-2188
Fax: +33-1-4288-2148
jcs@france-investigation.com
http://www.franceinvestigation.com

PONT L' EVEQUE

Colin Osborn (1999)

I-Cover
72 rue de Vaucelles
14130 Pont l'Eveque, France
Tel: +33-9-7520-7826
Fax: +33-2-3165-4046
cosborn@i-coversolutions.com

FRENCH POLYNESIA

TAHITI

PAPEETE

Frederic Yeung (LIFE)

Cabinet D'investigation Privee Yeung
53 Avenue Marechal Foch, PO Box 299
Tahiti, Papeete, 98713 French Polynesia
Tel: +689-439990

GERMANY

ASCHAFFENBURG

Hannelore Sachse-Burger (2008)

Detective Sachse
Mittelstr 5
63741 Aschaffenburg, Germany
Tel: +49-60-2130-44-12
Fax: +49 60-2130-44-44
Hanne@wesab.de

BAYERISCH GMAIN

Georg Ramsauer (1984)

Detektivunternehmen Dr.Georg Ramsauer
Weissbachstrasse 17a
Bayerisch Gmain, Germany 83457
Tel: +49-8651-78510
Info@Detektei-Ramsauer.com
http://www.detektei-ramsauer.com

BERLIN

Annett-Susann Bahr (LIFE)

Detektei Max Schimmelpfennig GmbH
Cicerostrabe 3
Berlin, 10709 Germany
Tel: +49-30-8579000
Fax: +49-30-8547471
info@schimmelpfennig.info
http://www.schimmelpfennig.info

Ralf Beyer (2001)

Beyer & Collegium GmbH
Prenzlauer Allee 36 / II. Aufgang
10405 Berlin, Germany
Tel: +49-30-9438-04-80
Fax: +49-30-9438-04-81
beyer@beyer-collegium.de
http://www.beyer-collegium.de

Juergen Hebach (2001)

DCI GmbH
Klinnerweg 69
D-13509 Berlin, Germany
Tel: +49-30-4334-68-9
Fax: +49-30-4335-33-1
fritz.wad-berlin@web.de
http://www.dci.name

Andreas Heim (2011)

Investigation Service Andreas Heim
Zillertalstr. 19, 13187 Berlin, Germany
Tel: +49-30-4730-08-59
Fax: +49-30-4730-08-69
anheim@t-online.de
http://www.defacto-jur.de

Lothar Mueller (1995)

ID-intertrace
Hessische Strasse 12
D-10115 Berlin, Germany
Tel: +49-30-2839-14-77
Fax: +49-32-2283-565-75
detmue@t-online.de
http://www.iD-intertrace.info

Matthias Willenbrink (1998)

Axom Germany Ltd.
Freiheit 12 A/B
12555 Berlin, Germany
Tel: +49-30-2000-506-60
Fax: +49-30-2000-506-66
mw@axom.de
http://www.axom.de

Stefanie Willenbrink (2006)

Axom Germany Ltd.
Freiheit 12 A/B
12555 Berlin, Germany
Tel: +49-30-2000-506-60
Fax: +49-30-2000-506-66
sw@axom.de
http://www.axom.de

BIELEFELD**Rolf Raschke (1986)**

Rolf Raschke Die Detektei
Weizenkamp 18
Bielefeld, D-33739 Germany
Tel: +49-52-035588
Fax: +49-5203-5544
rr@de-ra.de
http://www.de-ra.de

Eveline Wippermann (2000)

Detektei - Holler GmbH
Beckhausstrasse 168
33611 Bielefeld, Germany
Tel: +49-52-1821-60
Fax: +49-52-1874-94-5
e.wippermann@deho1.de
http://www.detektei-holler.de

COLOGNE**Martin Stein (2003)**

Ermittlungsburo Stein
Theodor-Heuss-Ring 62
50668 Cologne, Germany
Tel: +49-221-9259-24-0
Fax: +49-221-9259-24-24
info@detektive-stein.de
http://www.detektive-stein.de

CUXHAVEN**Claus Noeckel (2000)**

Detektei Noeckel
PO Box 521
27455 Cuxhaven, Germany
Tel: +49-47-2123007
Fax: +49-47-2123-30-8
schutzdienst@t-online.de

DIEBURG**Peter Nalikowski (2008)**

Detektiv Nali
Zuckerstr. 5
D-64807 Dieburg, Germany
Tel: +49-60-7149-68-40
Fax: +49-60-7149-68-41
info@detektiv-nali.de
http://www.detektiv-nali.de

DIRMSTEIN**Miriam Ettisch-Enchelmaier (LIFE)**

Ettisch-Enchelmaier GmbH
Bodelschwinghstr 9
Dirmstein (Pfalz), 67246 Germany
Tel: +49-6238-989-098
Fax: +49-6238-989-099
Ettisch-EnchelmaierGmbH@t-online.de
http://ettisch.euro-detectives.org

DORSTEN**Alfons Meismann (LIFE)**

Ab-Detective Condor GMBH
Endelner Feld 18
Dorsten, 46286 Germany
Tel: +49-2369-2030-0
Fax: +49-2369-2030-50
info@detectivecondor.de
http://www.detectivecondor.de

DORTMUND**Lothar Kimm (LIFE)**

Detektiv-Und Wachinstitut Kimm
Schwanenwall 31
Dortmund, 44135 Germany
Tel: +49-231-579633
Fax: +49-231-573934
kimm@t-online.de
http://www.detektei-kimm.de

DRESDEN**Lutz Peschel (1994)**

Alldek Saxonia GmbH
Bienertstrasse 18
01187 Dresden, Germany
Tel: +49-35-1471-74-05
Fax: +49-35-1471-74-06
info@alldek-saxonia.de
http://www.alldek-saxonia.de

DUESSELDORF**Ralf-Peter Herter (2008)**

Detektei Herter
PO Box 22 01 01
40608 Duesseldorf, Germany
Tel: +49-211-2539-98
Fax: +49-211-2555-29
info@detektei-herter.de
http://www.detektei-herter.de

Manfred Lotze (1999)

Detektiv-Institut KOCKS GmbH
Kalkumer Schlossallee 41A
40489 Dusseldorf, Germany
Tel: +49-211-4087-77-0
Fax: +49-211-4087-77-25
detektive-kocks@t-online.de
http://www.detektive-kocks.de

FRANKFURT**Wolfgang Scheiber (1999)**

Detektei Alpha
An Der Wellenburg 34
60437 Frankfurt, Germany
Tel: +49-69-4711-40
Fax: +49-69-2573-78-29-9
info@detektei-alpha.de
http://www.detektei-alpha.de

GROSS-GERAU**Tugan Dereli (2009)**

Detektei S&D
PO Box 1230
64521 Groß-Gerau, Germany
Tel: +49-177-3211-00-5
Fax: +49-615-2987-52-23
info@detektei-sd.de
http://www.detektei-sd.de

HAMBURG**Raoul Classen (2007)**

Detek Investigations AG
Fischertwiete 2 (Chilehaus)
D-20095 Hamburg, Germany
Tel: +49-40-7611-16-44
Fax: +49-40-7611-16-45
classen@detek.de
http://www.detek.de

Rolf Klauer (LIFE)

Hoyer & Jonatis
Beim Strohhaue 34
Hamburg, 20097 Germany
Tel: +49-40-28015350
Fax: +49-40-245046

Bodo Scholl (LIFE)

Infodatex
Grossmooring 19
Hamburg, 21079 Germany
Tel: +49-40-7662260
Fax: +49-407-6622644
info@infodatex.de
http://www.infodatex.de

HANHOFFEN**Dr. Maher Higazi (1999)**

Dr. Higazi Security Service GmbH
Raiffeisen Str. 2, D-67374 Hanhofen
Rheinland-Pfalz, Germany
Tel: +49-63-4494-42-80-0
Fax: +49-63-4494-42-80-22
dr.higazi@t-online.de
http://www.dr-higazi.de

HANNOVER**Christian Koelle (1991)**

EURO-WIRTSCHAFTSDIENST GmbH
Edgar-Scheibe-Str. 13
30655 Hannover, Germany
Tel: +49-51-1561-024
Fax: +49-51-1575-37-1
detektive@euroreform.de
http://www.euroreform.de

KARLSRUHE**Franz Klenkler (1999)**

Franz J. Klenkler Security & Investigations
Struvestrasse 43, 76187 Karlsruhe, Germany
Tel: +49-72-1985-00-80
Fax: +49-72-1985-00-82
kontakt@klenkler.de
http://www.klenkler.de

KASSEL**Engin Akbag (2010)**

Protex Group GmbH
Kölnische Str. 9-11, 34117 Kassel, Germany
Tel: +49-56-1574-35-60
Fax: +49-56-1574-35-62-1
ea@protex.de
http://www.protex.de

MONCHENGLADBACH**Johann Liebel (1998)**

Detektivinstitut J. Liebel
Diebesweg 14
41065 Monchengladbach, Germany
Tel: +49-216-1477-78-00
Fax: +49-216-1477-78-15
info@liebel.de

MÖNCHENGLADBACH**Joern Weber (2011)**

corma GmbH
Heinz-Nixdorf Str. 22
41179 Mönchengladbach, Germany
Tel: +49-216-1277-85-0
Fax: +49-216-1277-85-99
jw@corma.de
http://www.corma.de

MUNICH**Robert Hildebrandt (1999)**

Detective Lloyd GmbH
Ehrenbreitsteiner Strasse 20
80993 Munich, Germany
Tel: +49-89-3271-46-64
Fax: +49-89-3271-46-66
lloyd.detective@t-online.de
http://www.detective-lloyd.eu

Peter Schmid (1994)

Wirtschaftsdienste Peter Schmid GmbH
Passauer Str. 45
81369 Munich, Germany
Tel: +49-89-2782-790
Fax: +49-89-2782-78-27
Schmid.Consult.MUC@t-online.de
http://www.wirtschaftsdienste-schmid.de

NEUWIED**Guido Böckmann (2011)**

Detektei Böckmann
Sauerbruch Str. 2
56566 Neuwied, Germany
Tel: +49-263-1560-11-0
Fax: +49-321-2120-56-03
info@detektei-boeckmann.de
http://www.detektei-boeckmann.de

OBER RAMSTADT**Heinrich Mager (2002)**

Mager & Partner GmbH
Am Wingertsberg 8
64372 Ober Ramstadt,
Hessen, Germany
Tel: +49-61-5463-02-30
Fax: +49-61-5463-02-31
mager-partner@t-online.de
http://www.mager-partner.de

PANKETAL BEI BERLIN-BUCH**Liane Reinecke (1994)**

Beyer & Collegium GmbH
Goethestrasse 27
16341 Panketal bei
Berlin-Buch
Germany
Tel: +49-30-9438-04-80
Fax: +49-30-9438-04-81
info@beyer-collegium.de
or reinecke@beyer-collegium.de
http://www.beyer-collegium.de

PLETTENBERG**Rolf Wilmink (1996)**

MKW - Wirtschaftsdienst GmbH
PO Box 1652
58816 Plettenberg,
NRW, Germany
Tel: +49-239-1394-5
Fax: +49-239-1370-6
office@mkw-security.de
http://www.mkw-security.de

SIEGBURG**Andreas Simon (1996)**

Simon-Detektei
Scharnhorststrabe 2A
53721 Siegburg, Germany
Tel: +49-224-1524-00
Fax: +49-224-1665-80
Info@detektei-simon.de
http://www.detektei-simon.de

SITTENSEN**Sven Endom (2010)**

Euro-Leasing GmbH
Hansestrasse 1,
27419 Sittensen, Germany
Tel: +49-42-8293190
Fax: +49-42-8293-19-36
sendom@euro-leasing.de
http://www.euro-leasing.de

STUTTGART**Gunther Dingler (1989)**

Detektei Dingler
Staffenbergstrasse 10
70184 Stuttgart, Germany
Tel: +49-71-1164-95-90
Fax: +49-71-1164-95-98
contact@detectedingler.com
http://www.detectedingler.com

WICKEDE**Harald Röglin (2009)**

Detektive Röglin GbR
Auf Der Heege 6
58739 Wickede, Germany
Tel: +49-237-7910-52-0
Fax: +49-237-7910-52-1
info@detektive-roeglin.de
http://www.detektive-roeglin.de

WIESBADEN**Jurgen Jaitner (2007)**

Espo Risk Management GmbH
Taanusstr. 7,
65013 Wiesbaden, Germany
Tel: +49-61-1945-00-53
Fax: +49-61-1945-01-99
espo-europe@t-online.de
http://www.espo.de

GHANA**ACCRA****Bernard Owusu-Twumasi (2008)**

Oak House Company Ltd.
PO Box St 237, Accra, Ghana
Tel: +233-21-238374/245832
Fax: +233-21-238374
info@oakhousepi.com
http://www.oakhousepi.com

GREECE**ATHENS****Paul Anastasi (2010)**

Marathon Investigations
10, Diocharous Street,
Hilton Area
11528 Athens, Greece
Tel: +30-210-8044071
Fax: +30-210-6133827
info@investigations.gr
http://www.investigations.gr

Phillip Hatzis (2001)

Chicago Detective Agency In Greece
PO Box 13604, Syntagma Sq.
10310 Athens, Greece
Tel: +30-211-1768296
greekdetective@gmail.com
http://www.greekdetectiveagency.gr

Antonia Kaliva (1986)

Petroula Kaliva Private Detectives
14 Patission St.
Athens, 10677 Greece
Tel: +30-210-3834630
Fax: +30-210-3807893
toniakaliva@gmail.com

Alex Stoltidis (2006)

A&A Detecta
Private Investigators In Greece
33 Aristotelous St.
15234 Halandri-Athens, Greece
Tel: +30-694-4251909
Fax: +30 210-6830260
alex@investigator-greece.gr
http://www.investigators-greece.gr

PIRAEUS**Leonidas Gikas (2013)**

LG Private Investigations
100 Kolokotroni Street
18539 Piraeus, Greece
Tel: +30-213-0443412
Fax: +30-6936 85464
leogikas@gmail.com
http://www.lgpi.gr

VOLOS**Spyro Zakyntinos (2011)**

SPYro Zakyntinos Investigations
8 El. Venizelou & Dimitriadou Ave
GR 38221 Volos, Greece
Tel: +30-242-1027106
Fax: +30-242-1027279
info@spyro.gr
http://www.detective-zakyntinos.com

GUATEMALA**GUATEMALA CITY****Zoraida Karina Soto (2005)**

ZK Selectiva, S.A.
3a. Ave. 12-38 Zona 10, Edificio Paseo
Plaza Business Center, Of. 305
Guatemala City, Guatemala
Tel: +502-2339-0002 to 06
Fax: +502-2339-0006
zkselectiva@hotmail.com
http://www.zkselectiva.com

HONG KONG**HONG KONG****Bradley Allan (2012)**

Allan & Associates
6th Floor, St. John's Bldg.,
33 Garden Road
Central Hong Kong, Hong Kong
Tel: +852-2987 7926
Fax: +852-2428 4803
ballan@allan-assoc.com
http://www.allan-assoc.com

Paul Bromberg (1998)

Spectrum OSO Asia Ltd.
20/F Central Tower,
No. 28 Queen's Road
Central Hong Kong, Hong Kong
Tel: +852-2159-9154
Fax: +852-2877-0046
Pbromberg@Spec-oso.com
http://www.spec-oso.com

Jack Chu (2005)

RA Consultants Ltd.
Unit 2504, Shun Tak Centre,
200 Connaught Road
Central, Hong Kong
Tel: +852-2647-2626
Fax: +852-2646-9311
jack.chu@ra.com.hk
http://www.ra.com.hk

Che-Ying So (1983)

Hong Kong Investigation Bureau
745-747 Nathan Road-Golden Plaza
Block B, 5th Flr., Kowloon
Hong Kong, China
Tel: +852-2818008

William Tam Kwok Hung (2000)

Intercontinental Private Detective Agency
Flat B, 9/F, Wan Hen Commercial Centre
381-383 Hennessy Rd
Causeway Bay
Hong Kong
Tel: +852-2891-4896
Fax: +852-3904-8530
atcy@netvigtor.com
http://www.intercontinentail.ecomm.hk

Yosh Wong (2011)

Emmaus (Asia Pacific) Ltd.
Unit 503, 5/F, Tower 2,
Lippo Centre, 89 Queensway
Admiralty, Hong Kong
Tel: +852-3579-5445
Fax: +852-3579-5447
info@emmaus-ap.com
http://www.emmaus-ap.com

KOWLOON**Hoi Yi Chu (2012)**

Global Investigation and
Security Consultancy Ltd.
Rm 4,6/F,
Hip Kwan Commercial Bldg.,
38 Pitt St.
Yau Ma Tei, Kowloon, Hong Kong
Tel: +852-2264 8303
Fax: +852-3020 3254
admin@g-inv.com.hk
http://www.g-inv.com.hk

Chan Yung Chuen (2011)

The World of Detective Company
Room 1203, 12/F,
655 Nathan Road
Mong Kok, Kowloon,
Hong Kong
Tel: +852-2264-8700
Fax: +852-3695-0503
hk@twodc.com.hk
http://www.twodc.com.hk

Fuk-Ki Li (LIFE)

Far East Security Services Ltd.
Room 602, 6/F., Island Centre,
470 Reclamation Street, Mong Kok
Kowloon, Hong Kong
Tel: +852-2388-8577
Fax: +852-2770-9948
lifk@biznetvigator.com
http://www.fareast-secur.com.hk

Benedict Wong (2012)

Total Credit Management Services
Hong Kong Limited
Suite 501, 5/F, Hung To Centre
94-96 How Ming St.
Kwun Tong, Kowloon, Hong Kong
Tel: +852-2850 6682 x85
Fax: +852-2854 3251
ben@totalcredit.hk
http://www.totalcredit.com.hk

SHEUNG WAN**Cheuk Ho (Tommy) Chan (2012)**

Wan King On Investigations
Room 1104B, 11/F,
Kai Tak Commercial Building,
317-319 Des Voeux Road, Central
Sheung Wan, Hong Kong
Tel: +852-2408 8878
Fax: +852-3011 5000
hkoko@ymail.com
http://www.hkoko.com.hk

WANCHAI**Theodore Kavowras (2003)**

Panoramic Consulting Ltd.
Unit B, 16/F, W Square, 318 Hennessy Rd.
Wanchai, Hong Kong
Tel: +85-22-838-0331
Fax: +85-22-975-8973
ted@panoramicconsulting.com
http://www.panoramicconsulting.com

HUNGARY**SOLYMAR****Zsolt Gelencsér (2012)**

PI Network Hungary
58 József Attila Street
Solyvár H-2083 Hungary
Tel: +36-70-318 5309
gelencser@pinetwork.hu
http://www.pinetwork.hu

INDIA**AHMEDABAD****Jaspreet Arora (2009)**

Private Patrol Services
10, Auda Municipal Market
Near Usmanpura Cross Road, Ashram Road
380 014 Ahmedabad, Gujarat, India
Tel: +91-98-25030838
arorajaspreet@yahoo.com

Kanwaljeet Arora (2009)

Private Patrol Services
10, Auda Municipal Market
Near Usmanpura Cross Road, Ashram Road
380 014 Ahmedabad, Gujarat, India
Tel: +91-98-25030838
private_patrol@hotmail.com

Ramakant Chaturvedi (2009)

Pioneer Security & Allied Services Pvt. Ltd.
212, Circle P Building,
Nr Prahladnagar Garden, Satellite, SG Road
380 051 Ahmedabad, Gujarat, India
Tel: +91-79-26937561
Fax: +91-79-26937562
rk_1422@yahoo.com
http://www.pioneersecurity.co.in

Indrapal Chaudhary (2009)

Max Vigil Security Pvt. Ltd.
503, 5th Floor
Aakash Ave., B/h Muslim Society
Mithakhali Six Roads
380 009 Ahmedabad, Navrangpura, India
Tel: +91-79-40050609
Fax: +91-79-26466466
ipsingh@maxvigilsecurity.in
http://www.maxvigilsecurity.in

Jitendra Kumar Chaudhary (2012)

Max Vigil Security Pvt. Ltd.
42, Fourth Floor, Astha Avenue,
Opp. R.T.O., Nr.Subhash Bridge Circle
380 027 Ahmedabad, Gujarat, India
Tel: +91-79-29298896
Fax: +91-79-27553476
maxvigil2004@yahoo.co.in
http://www.maxvigilsecurity.in

R. P. Chauhan (1987)

Perfect Investigation &
Personnel Services Pvt.Ltd.
07, Shalimar Complex, 1st Flr,
Mahalaxmi Five Road, Paldi
Ahmedabad, Gujarat, 380 007 India
Tel: +91-79-26651749
Fax: +91-79-26650809
rps_chauhan2005@rediffmail.com
http://www.perfectinvestigation.com

Shyourajsingh Chauhan (1998)

Perfect Security Services
407-408, Medicine Market,
Nr.Bonny Travels, Paldi
380 007 Ahmedabad
Gujarat, India
Tel: +91-79-26577384
Fax: +91-79-26585899
info@perfectsecurityservices.com
http://www.perfectsecurityservices.com

Bakul Dave (2006)

Eagle Eye Security & Services
202 Maurya Complex
Opp.C.U.Shah College,
Nr. Income Tax, Off. Ashram Road
380 014 Ahmedabad, Gujarat, India
Tel: +91-79-27543332
Fax: +91-79-27544332
bakuldave@yahoo.in
http://www.eagleeyesecurity.in

Omprakash Dixit (1998)

Dixit Investigation & Security
2nd Flr., Swapna Sakar-III
Opp. Apsara Cinema, Kankaria
380 022 Ahmedabad, India
Tel: +91-79-5331611
Fax: +91-79-5331612
admin@dixitsecurity.com
http://www.dixitsecurity.com

Shivindra Pratap Singh (2005)

Lancers Network Limited - Ahmedabad
503, Pratiksha Complex,
Mahalaxmi Five Roads
Paldi, Ahmedabad, Gujarat
India 380 007
Tel: +91-79-32915354
Solutions@Lancerindia.com
http://www.lancerindia.com

Rajkumar Tyagi (2011)

Central Investigation &
Security Services, Ltd.
A/305 Wall Street II Opp. Orient Club
Ellisbridge
380 006 Ahmedabad, India
Tel: +91-79-30280106
Fax: +91-79-30280110
tyagi2k1@gmail.com
http://www.cisgroup.com

Radheyshyam Yadav (2012)

United Investigation & Security Services
104, Hare Krishna Complex,
B/h. City Gold Cinema,
Ashram Road, Navrangpura
380 009 Ahmedabad, Gujarat, India
Tel: +91-79-26574725
Fax: +91-79-26587751
uissshurksha@gmail.com

ANDHERI**Swran Salaria (1981)**

Trig Detectives Pvt. Ltd.
Trig House, 97 J.P. Road,
near Navrang Cinema
Andheri (W), Mumbai 400 058 India
Tel: +91-22-66783333
Fax: +91-22-66783399
trigdetc@bom5.vsnl.net.in
http://www.trigsecurity.com

ANKLESHWAR**Kiran Pal Singh (2009)**

T-5 Security Services
B-5, Tyagi Nagar, Hansot Road,
Dist. Bharuch,
393 001 Ankleshwar, Gujarat, India
Tel: +91-26-46645381
kpsinghmajor@yahoo.com

BANGALORE**Capt. D.K. Giri (2012)**

Sharp Detectives Pvt. Ltd.
1st Main Road, 1 Block, Dr.
Rajkumar Road, Near Navrang Theater
Bangalore, Karnataka 560 010 India
Tel: +91-040-32999007
Fax: +91-09342167007
info@nikhilgiri.com
http://www.sharpdetectives.com

Naman Jain (2013)

Sleuths India Consultancy Pvt. Ltd.
20, Ground Floor
Prestige Copper Arch,
83, Infantry Road
Bangalore, 560 001, India
Tel: +91-959-010 1000
Fax: +91-120-4208877
naman@sleuthsindia.com
http://www.sleuthsindiadetectives.com

Puneet Kumar (2008)

Globe Detective Agency Private Ltd.
102-103, Money Centre, 121,
7 Block, Koramangala
560 034 Bangalore, India
Tel: +91-80-25717905
Fax: +91-80-25717349
puneetkumar@globedetective.com
http://www.globedetective.com

BANGALORE, KARNATAKA**Shivindra Pratap Singh (2005)**

Lancers Network Limited - Bangalore
#240, 1 Floor, 32nd Cross,
Jayanagar 7th Block, Near Nsvk
Bangalore, Karnataka, India 560 082
Tel: +91-80-65986211
Fax: +91-80-22446941
Solutions@Lancerindia.com
http://www.lancerindia.com

BHAVNAGAR**Arvindkumar Gohil (2012)**

Universal Security Services
94, Municipal Shopping Center,
Nirmalnagar Naka
Opp. Madhav Ratan
364 001 Bhavnagar, India
Tel: +91-278-2510288
Fax: +91-278-2510288
arvindsinh.gohil@yahoo.com
http://www.universalsecurityservices.in

BOMBAY (MUMBAI)**Peringalon Ali (1982)**

Security & Intelligence Services (India)
6 2nd Floor, Meghal Ind. Estate,
Devidayal Rd., Mulund (W)
Bombay, Mumbai, 400 080 India
Tel: +91-22-25674038
Fax: +91-22-2590 4990
securityintelsvc@sify.com

Pradeep Bakshi (2004)

Bakshi Security & Personnel Services Pvt. Ltd.
Unit No.234/235, Bldg. No.2
New Sonal Link Indl.Estate, Link
Road, Kach Pada, Malad (W)
400 064 Mumbai, Maharashtra, India
Tel: +91-22-40272101 x199
Fax: +91-22-402721130
pradeep@bakshisecurity.com
http://www.bakshisecurity.com

Indeera Bawa (2004)

Littlemore Services Private Ltd.
A-15 Sealord, Cuffe Parade
400 005 Mumbai, Maharashtra, India
Tel: +91-22-22186176
Fax: +91-22-22182123
lms@vsnl.com
http://www.littlemoredetectives.com

Richard Desouza (2012)

CRP Technologies (India) Ltd.
B/208-209, 2nd Floor, Classique Centre,
Opp.Mahal Industrial Estate,
Off Mahakali Caves Road,
Andheri (East),
400093, Mumbai, India
Tel: +91-22-40277777
Fax: +91-22-40277070
richard.desouza@crp.co.in
http://www.crp.co.in

Naman Jain (2013)

Sleuths India Consultancy Pvt. Ltd.
215, D Wing, Crystal Plaza,
Opp. Infinity Mall, New Link Road
Andheri (W)
Mumbai, 400 053, India
Tel: +91-22-67251354
Fax: +91-120-4208877
info@sleuthsindia.com
http://www.sleuthsindiadetectives.com

Bandlish Kumar (2002)

Safeguard Security Services
110 Nirman Estate Chincholi,
Link Road Malad West
400 064 Mumbai, Maharashtra, India
Tel: +91-22-67250225
Fax: +91-22-28775695
safeguard@vsnl.com
http://www.safegroup.co.in

Vivek Kumar (2007)

Globe Detective Agency Private Ltd.
39 Jolly Maker Chamber No.-2,225
400 021 Nariman Point
Mumbai, India
Tel: +91-22-22028734
Fax: +91-22-22029521
vivekkumar@vsnl.com
http://www.globedetective.com

Diwan Nanda (1994)

Tops Security Ltd.
Topsgrup Country Hq,
5 Royal Palms, Golf & Country Club
Aarey Milk Colony
400 065 Goregaon (E)
Mumbai, India
Tel: +91-22-67711000
Fax: +91-22-67722000
drn@topsgroup.com
http://www.topsgroup.com

Navzar Maneckshaw (2004)

Maneckshaw & Associates
1120 Prasad Chambers, Opera House
400 004 Bombay, Mumbai, India
Tel: +91-22-3670372
Fax: +91-22-3630169
Navzar_jamshed@yahoo.com

Sujeet Menezes (2007)

I.B.I. Detectives Pvt. Ltd.
164 Mody Street, Jhaveri Chambers
400 001 Fort, Mumbai, India
Tel: +91-22-22613292
Fax: +91-22-22678966
sujeet.m@ibigroup.co.in
http://www.ibidetectives.com

Puthenveetil Menon (LIFE)

Tradesvel Security Services Pvt Ltd.
14 Aboobakar Mansion, 2nd Flr.,
Shahid Bhagatsingh RD.
Bombay, Mumbai, 400 001 India
Tel: +91-22-2021318
Fax: +91-22-2044751

Purnima Pandya (2012)

Central Investigation & Security Services, Ltd.
701, Crystal Paradise Mall,
Veera Desai Road, Andheri (W),
400 053 Mumbai, Maharashtra, India
Tel: +91-22-26733775
Fax: +91-22-26731776
purnima@cissindia.co.in
http://www.cissindia.co.in

Mohanrao Pimple (2012)

Central Investigation & Security Services Ltd.
A-203, 2nd Floor, Excel House,
J.V.P.D. Road No. 13,
Behind Pinkel Medical Store, Juhu
400 049 Vile-Parle (West) Mumbai,
Maharashtra, India
Tel: +91-22-26208956
Fax: +91-22-26208954
mnadv@rediffmail.com
http://www.cissindia.co.in

Natasha Pimple (2012)

Central Investigation & Security Services, Ltd.
701, Crystal Paradise Mall,
Veera Desai Road, Andheri (W),
400 053 Mumbai, Maharashtra, India
Tel: +91-22-26733775
Fax: +91-22-26731776
natasha_pimple@yahoo.com
http://www.cissindia.co.in

Ramesh Pimple (2011)

Central Investigation &
Security Services, Ltd.
701, Crystal Paradise Mall,
Veera Desai Road, Andheri (W),
400 053 Mumbai, Maharashtra, India
Tel: +91-22-26733775
Fax: +91-22-26731776
info@cissindia.co.in
http://www.cissindia.co.in

Seshadri Rajagopal (2004)

Tata Consultanct Services
TCS House, Ravelline St., 21 DS Marg
400 001 Bombay (Mumbai), India
Tel: +91-22-67789940
Fax: +91-22-67789000
rajagopal.seshadri@tcs.com
http://www.tcs.com

Capt. Santosh Sharma (1982)

Hindustan Security Force
Sagar Samrat - 1F,
31-A, M.K. Road (East)
Bombay, Mumbai, 400 614 India
Tel: +91-22-23827862
Fax: +91-22-23872621
hinsef@hotmail.com

Ram Niwas Singh (1993)

Bombay Intelligence Security (India) Ltd.
101 Omega House,
Hiranandani Gardens, Powai
400 076 Bombay, Mumbai, India
Tel: +91-22-25705256
Fax: +91-22-25705276
info@bombayintelligence.com
http://www.bombayintelligence.com

Dhanushkodi Sivanandhan (2012)

Securus First India Pvt. Ltd.
1203, One Indiabulls Centre,
Tower 2, Floor 12 B
841 Senapati Bapat Marg,
Elphinstone Road
Mumbai, 400 013, Maharashtra, India
Tel: +91-22-67470707
Fax: +91-22-67470701
dsiva@securusfirst.com
http://www.securusfirst.com

CHENNAI**Capt. Shibu Isaac (2010)**

Force 1 Guarding Services Pvt. Ltd.
Flat 1B Suvarna Darshan 47,
2nd Main Road,
Gandhi Nagar Adyar
600 020 Chennai
Tamil Nadu, India
Tel: +91-44-24453060
Fax: +91-44-24455566
force1s154@vsnl.net
http://www.force1services.com

Narasimha Naidu (2011)

Gautam Detective and
Security Services Pvt. Ltd.
No-387, G.S.T., Road, West Tambaram
600 045 Chennai, India
Tel: +91-44-22385470
Fax: +91-44-22385440
gautamdetective@gmail.com
http://www.gautamdetective.com

GUJARAT**Vikram Mahurkar (1998)**

Checkmate Services Pvt Ltd.
Gf 6-9, Amaan Towers,
Fatehgunj Main Road
390 002 Fatehgunj
Baroda, Gujarat, India
Tel: +91-26-56698200
Fax: +91-26-56623339
vikram@checkmateservices.com
http://www.checkmateservices.com

KOLKATA**Rajesh Bharti (2010)**

Always Detective Services Pvt. Ltd.
192, Jodhpur Gardens
700 045 Kolkata, West Bengal, India
Tel: +91-33-24173947
Fax: +91-33-24830590
alwaysdetectiveservices@gmail.com
http://www.alwaysdetective.com

Satnam Ahluwalia (2011)

Kolkata Response Group Private Ltd.
P-118, C.I.T. Road
700 014 Kolkata, West Bengal, India
Tel: +91-33-22866000
Fax: +91-33-2286 6204
satnam.kolkata@gmail.com
http://www.krgsecurity.com

NAGPUR**Meghshyam Karonde (1976)**

Swastik Detective Agency Pvt.Ltd.
First Flr., HKMC, 1-A Hanuman Nagar
Nagpur, Maharashtra, 440 009 India
Tel: +91-712-2745001
Fax: +91-712-2746358
meghkaronde@gmail.com
http://www.swastikdetective.com

NAVI MUMBAI**Gurcharan Chauhan (2012)**

CD Safety & Security Services Pvt. Ltd.
26 Welfare Chambers, 1st Floor,
Sector 17, Vashi
400 705 Navi Mumbai, Maharashtra, India
Tel: +91-22-27894268
Fax: +91-22-27706149
cd_security@hotmail.com
http://www.cdss.co.in

NEW DELHI**Pawanjit Ahluwalia (1984)**

Premier Shield Pvt Ltd.
A 282 Okhla Phase 1
New Delhi, 110 020 India
Tel: +91-11-3085-5000
pawan@premiershield.net
http://www.premiershield.com

Rahul Gupta (2012)

Secret Watch Detectives Pvt. Ltd.
284, 3rd Floor, Satya Niketan, Dhaura Kuan,
Opp. Sri Venkateswara College
110 021 New Delhi, India
Tel: +91-11-24109233
ceo@secretwatchdetectives.com
http://www.secretwatchdetectives.com

Naman Jain (2013)

Sleuths India Consultancy Pvt. Ltd.
109, L.G.F., Ansals Fortune Arcade,
K-Block, Sector 18, Noida
New Delhi, 201301, India
Tel: +91-12-04338844
Fax: +91-12-04208877
info@sleuthsindia.com
http://www.sleuthsindiadetectives.com

Ashok Kamle (2012)

CISS Bureau
7 Satya Niketan, 1st Floor,
Moti Bagh II, Nanak Pura
110 021 New Delhi, India
Tel: +91-22-26396791
Fax: +91-11-26882760
54ashoka@gmail.com
http://www.ciss.co

Jyoti Karan (2009)

Security & Intelligence
Services (India) Ltd.
A-28 & 29, Okhla Industrial Area Phase-1
110 020 New Delhi, India
Tel: +91-98-11667296
Fax: +91-11-46464400
jkkaran@sisindia.com
http://www.sisindia.com

Jitender Kumar (2013)

Jasper Network Services
B-14, Vikas Kendra E-Block Market,
Vikas Puri, New Delhi, 110 018, India
Tel: +91-11-28533717
info@surveillancesquads.com
http://www.surveillancesquads.com

Sachit Kumar (2007)

Globe Detective Agency Private Ltd.
601-603, Eros Apartment, 56,
Nehru Place
110 019 New Delhi, India
Tel: +91-11-26432681
Fax: +91-11-26435112
sachitkumar@globedetective.com
http://www.globedetective.com

Taralika Lahiri (2007)

National Detectives & Corporate Consultants
S-89 Panch Shila Park, 1st Flr.
110 017 New Delhi, India
Tel: +91-11-40502008
Fax: +91-11-26014457
ndcc@sify.com
http://www.detectivesindia.com

Tej Lohia (2010)

Eagle Hunter Solutions Ltd.
61-C, Kalu Sarai
110 016 Sarvapriya Vihar,
New Delhi, India
Tel: +91-11-26850326
Fax: +91-11-26866934
info@eaglehunters.com
http://www.eaglehunters.com

Ramesh Madan (LIFE)

Goliath Detectives Private Ltd.
PO Box 8854
New Delhi, 110 057 India
Tel: +91-11-26153275
Fax: +91-11-26153276
info@rameshmadan.com
http://www.rameshmadan.com

Virendra Pandit (2007)

Multidimensional Management Consultants
K 5/-C, Saket
110 017 New Delhi, India
Tel: +91-11-41831719
vmp@mcminvestigators.com
http://www.mcminvestigators.com
& http://www.cbi.ind.in

Captain Ravee (2006)

Fireball Detective Network Pvt. Ltd.
J-22, B.K. Dutt Colony, Jor Bagh Rd.
110 003 New Delhi, India
Tel: +91-98-10056921
Fax: +91-11-41648372
ravee@fireballdetectives.com
http://www.fireballdetectives.com

Mahesh Sharma (2010)

GDX Detectives Pvt. Ltd.
GDX House, 29 Sant Nagar,
East of Kailash
110 065 New Delhi, India
Tel: +91-11-26440469
Fax: +91-11-26229726
info@gdxhouse.com
http://www.gdxgroup.com

Ajit Singh (2005)

Hatfield Detectives Private Ltd.
158, First Flr., Satya Niketan
110 021 New Delhi, India
Tel: +91-11-26877101
Fax: +91-11-26879101
ajit@hatfieldindia.com
http://www.hatfieldindia.net

Kunwar Singh (2001)

Lancers Network Ltd.
#630, 2nd Floor, West End Marg,
Lane #3, Kohinoor Enclave, Saidulla Jab
110 030 New Delhi, India
Tel: +91-11-29531371
Fax: +91-11-29531370
detectives@lancerindia.com
http://www.lancerindia.com

Shivindra Pratap Singh (2005)

Lancers Network Ltd.
#630, 2nd Floor, West End Marg,
Lane #3, Kohinoor Enclave, Saidulla Jab
110 030 New Delhi, India
Tel: +91-11-26105616
Fax: +91-11-29531370
spsingh@lancerindia.com
http://www.lancerindia.com

Subhash Wadhawan (2001)

Detective Network (India) Pvt. Ltd.
S-2 Paradise Plaza,
Alaknanda Commercial Complex
110 019 New Delhi, India
Tel: +91-12-44009004
Fax: +91-11-26023967 Delhi Office
subhash.w@detective-network.com
http://www.detective-network.com

PUNE**Gurdeep Arora (1999)**

Checkmate Industrial Services Pvt. Ltd.
H-101, Wing 9,
Opp.Janseva Sahakari Bank,
Parmar Park, Wanowrie
411 040 Pune, India
Tel: +91-20-26876890
Fax: +91-20-26814203
gurdeeparora51@rediffmail.com

Capt. D.K. Giri (2012)

Sharp Detectives Pvt. Ltd.
Shop 8, 2nd Floor,
Alankar Cinema Building
Pune, Maharashtra 411 001 India
Tel: +91-020-26113007
Fax: +91-09049735007
info@gautamgiri.com
http://www.sharpdetectives.com

RAJKOT**Raghuvir Jadeja (2007)**

National Security Services
Bhavani Chambers, OPP: Mehta Pump
Dhebar Road
360 002 Rajkot, Gujarat, India
Tel: +91-28-12239007
Fax: +91-28-12239505
natsec@rediffmail.com

Jignesh Shah (2010)

J.B. Investigation Agencies Pvt. Ltd.
"Vrajbhumi"
Block No. 72-73,
Radha Park, Radha Residency,
150' Ring Rd.
Near Jamnagar Bye-Pass
360 007 Rajkot, India
Tel: +91-28-19824831-378 mobile
shahjbadvc71@yahoo.in

SECUNDERABAD**Capt. D.K. Giri (2011)**

Sharp Detectives Pvt. Ltd.
G-3, C-Block, Kubera Towers,
Trimulgherry X Roads
500 015 Secunderabad,
Andhra Pradesh, India
Tel: +91-40-32999007
Fax: +91-40-27795007
sharp.cmd@gmail.com
http://www.sharpdetectives.com

Shivindra Pratap Singh (2005)

Lancers Network Limited - Hyderabad
B-87, 4th Flr, Airlines Colony
Begumpet, Secunderabad,
Andhra Pradesh, India 500 003
Tel: +91-40-27960551
Solutions@Lancerindia.com
http://www.lancerindia.com

Major (Retd.) L.D. Verma (LIFE)

Indoforce Bureau Private Ltd.
302, Kabra Complex.
Mahatma Gandhi Road
Secunderabad,
Andhra Pradesh, 500 003 India
Tel: +91-99-89555011
Fax: +91-11-26292856
indoforce@gmail.com
http://www.indoforce.com

VADODARA**Mukesh Vyas (2012)**

Reliable Investigation & Security Services
507, Gayatri Chambers,
R.C. Dutt Road, Alkapuri
390 007 Vadodara
Gujarat, India
Tel: +91-26-52325127
Fax: +91-26-52354640
reliable_731@hotmail.com

INDONESIA

JAKARTA

James Filgo (1998)

Consolidated Services International, Inc.
Jakarta Stock Exchange,
Tower 2, 17th Flr.
Jalan Jenderal Sudirman Kav. 52-53
12190 Jakarta, Indonesia
Tel: +62-21-794-2970 x306
Fax: +62-21-791-90015
jdf@interteknis.co.id
http://www.consolvcs.com

Edouard Helfand (2013)

PT Integrity Indonesia
Jl. RS Fatmawati No. 57 b, Cilandak
Jakarta, 12430, Indonesia
Tel: +62-21-769-8277
Fax: +62-21-766-8182
contact@integrity-indonesia.com
http://www.integrity-indonesia.com

IRELAND

DUBLIN

Anthony Fennessy (2012)

Tolcom Security and Investigations Ltd.
91A Lagan Road,
Dublin Industrial Estate, Glasnevin
Dublin, 11, Ireland
Tel: +353-1-830-9230
Fax: +353-1-830-9230
info@tolcomsecurity.com

COUNTY KILDARE KILCULLEN

Christopher Nolan (LIFE)

1047 "A" Nicholastown
Kilcullen, Co. Kildare, Ireland
Tel: +353-4-548-0887
cnolan@arguseur.com

COUNTY PORTLAOISE LAOIS

Brendan Mallen (2003)

IP Forensics Ltd.
Rathbrennan
Portlaoise Co. Laois, Ireland
Tel: +353-57-8646976
brendan.mallen@ipfltd.com
http://www.IPFLTD.com

ISRAEL

HAIFA

Aviram Azari (2006)

Aviram Hawk-
Consultant Investigations And Operations
49 Moran
Kiryat Yam (Haifa), Israel
Tel: +972-4-8774224
Fax: +972-4-8758771
aaa8890@gmail.com
http://www.aviram-netz.co.il

Haim Lankery (2013)

V.I.P Investigations & Surveillances
PO Box 25577
Haifa, 31254, Israel
Tel: +972-4-8660330
Fax: +972-4-8669-827
haim@pi-h.co.il
http://www.pi-h.co.il

Meir Naveh (1986)

C.I.B.-Civil Investigation Bureau
84 Ha'atzmaut Road, PO Box 2541
Haifa, 31025 Israel
Tel: +972-4-8511811
Fax: +972-4-8511811
cib_invs@netvision.net.il
http://cib_invs.co.il

Shaul Toledano (2009)

Shaul Toledano- Private Investigations
Natanzone 8
33034 Haifa, Israel
Tel: +972-4-8670011
Fax: +972-4-8670012
hakira@012.net.il
http://www.hakira.co.il

JERUSALEM

Ben Dror Matan (1992)

CTS Universe Ltd.
5 Hativat Givati St.
97546 Jerusalem, Israel
Tel: +972-2-656-7917
Fax: +972-2-6561546
enibendi@netvision.net.il
http://www.ctsuniverse.com

MEVASERET ZION

Yirmiyahu Lebendiger (LIFE)

ETGAR
Shvo 4/6, Mevaseret Zion, 90805 Israel
Tel: +972-2-6230505
Fax: +972-2-6235655
NIMI55@gmail.com
http://www.etgar-pi.co.il

PARDES HANA

David Adar (2004)

Adar - PI
Sapir 51,
37026 Pardes Hana, Israel
Tel: +972-5-42001419
Fax: +972-153-54-2001419
david@adar-pi.com
http://www.adar-pi.com

PETAH TIKVA

Ira Nathan (1999)

IN Investigations
24 Haim Cohen St.
49553 Petah Tikva, Israel
Tel: +972-3-9226836
Fax: +972-3-9246616
ininves@zahav.net.il
http://www.ininves.com

RA'ANANA

Jacob Lapid (1994)

Lapidim Projects Ltd.
Hamagser St., POB 3020
43000 Ra'anana, Israel
Tel: +972-9-8995653
Fax: +972-9-8995598
lapidim@bezeqint.net
http://www.lapidim.com

Raphael Rahav (2006)

Eyal C.I.L. Ltd.
Beit Ron, 142 Ahuza St.
43300 Ra'anana, Israel
Tel: +972-9-9518223
Fax: +972-9-9516221
rahavr1@zahav.net.il
http://www.eyal-cil.com

RAMAT GAN

Itzhak Dekel (2007)

D.I. Solutions-Special Investigations
15 Abba Hillel Rd.
(Diamond Bourses Area)
52522 Ramat-Gan, Israel
Tel: +972-3-5753395
Fax: +972-3-5753394
itzik@solutions-pi.co.il
http://www.solutions-pi.co.il

Alex Haimovich (2011)

A. Haimovich Investigations
Menahem Begin St' 16, 5th floor
Ramat Gan, 6121101, Israel
Tel: +972-3-6120255
Fax: +972-3-6120244
alex@haimovich.co.il

Eliezer Gichon (LIFE)

Gichon
45 Jabotinsky Street
Ramat-Gan, 52511 Israel
Tel: +972-3-7510755
Fax: +972-3-7510755
gichon@012.net.il

Michael Kriger (2005)

Sherlock Investigations
PO Box 7775
52177 Ramat-Gan, Israel
Tel: +972-3-5743011
Fax: +972-3-6767654
sherlock8@bezeqint.net

RISHON LEZION

Eyal Sabro (2005)

Raz Investigations
45 Rotshild Street - PO Box 11
75100 Rishon Lezion, Israel
Tel: +972-3-9566060
Fax: +972-3-9566061
eyal@raz-pi.co.il
http://www.raz-pi.co.il

TEL-AVIV

Joe Hochman (LIFE)

Worldwide Investigation & Consultancy
PO Box 29861
Tel-Aviv, 61298 Israel
Tel: +972-3-6317676
Fax: +972-3-6317676
hochmangroup@gmail.com

David Levy (1991)

Shmira & Bitachon Ltd.
69 Levinsky St.
66855 Tel-Aviv, Israel
Tel: +972-3-6392233
Fax: +972-3-6392211
sb@sbisrael.co.il
http://www.sbisrael.co.il

Eitan Newman (2000)

E.M.T. Investigations
21 Unitzman, PO Box 4117
61040 Tel-Aviv, Israel
Tel: +972-3-6999001
Fax: +972-3-6998865
service@emt.co.il
http://www.emt-investigations.com

Jacob Ofir (1986)

Eran Private Investigations
P.O. Box 32440, Tel Aviv, 61323 Israel
Tel: +972-54-4353200 mobile
Fax: +972-3-5426694
eraninv@eraninv.com
http://www.eraninv.com

Samuel Shevach (LIFE)

Global Security Shevach Group Ltd.
74 Derech Petach Tikva,
Maya Building, Tel-Aviv, 67215 Israel
Tel: +972-3-5614747
Fax: +973-3-5614780
globsec@globalsecurity.co.il
http://www.global-security-sgr.co.il

Yair Shirin (2002)

Alibi Private Investigation
44 Derech Menachem Begin
66183 Tel-Aviv, Israel
Tel: +972-3-5370489
Fax: +972-3-6390554
alibi_pi@zahav.net.il
http://www.alibi-pi.com

Aaron Sivan (LIFE)

Isoof Information & Security Service
Yigal Alon St 155, Tel-Aviv, 67443 Israel
Tel: +972-3-6855777
Fax: +972-3-6855778
isooof@bezeqint.net

Asher Wizman (2006)

Wizman-Yaar Investigations
Yosef Karo 18, 67014 Tel-Aviv, Israel
Tel: +972-3-5627777
Fax: +972-3-5626080
wy@wyinv.com
http://www.wyinv.com

Doron Yaar (2006)

Wizman-Yaar Investigations
Yosef Karo 18, 67014 Tel-Aviv, Israel
Tel: +972-3-5627777
Fax: +972-3-5626080
doron@wyinv.com
http://www.wyinv.com

ITALY**ASTI****Mauro Zocca (2002)**

Explorer srl
Corso Alfieri, 310
14100 Asti, Italy
Tel: +39-014-1322371
Fax: +39-014-1322371
info@explorer-investigazioni.it
http://www.explorer-investigazioni.it

BERGAMO**Marco Romano (2001)**

Il Segugio SRL
Via Taramelli 36
24121 Bergamo, Italy
Tel: +39-035-238685
Fax: +39-035-211293
ilsegugio@ilsegugio.com

Umberto Romano (1991)

Il Segugio SRL
Via Taramelli 36
24121 Bergamo, Italy
Tel: +39-035-238685
Fax: +39-035-211293
umberto.romano@ilsegugio.com

BOLOGNA**Gavino Piredda (1990)**

IN.CO.Investigazioni Internazionali
Di Peredda Gavino Saverio
Galleria del Toro 03, Interno 41
40121 Bologna, Italy
Tel: +39-335-224310
Fax: +39-051-3762685
inco.investigazioni@gmail.com
http://www.incoinvestigazioni.it

BRESCIA**Massimo De Paoli Alighieri (1998)**

L'Investigativa SRL
Corso G. Matteotti 12
25122 Brescia, Italy
Tel: +39-030-44884
Fax: +39-030-44877
massimo.depaoli@linvestigativa.it
http://www.linvestigativa.it

Luciano Ponzi (2011)

Gruppo Ponzi Investigazioni SRL
Via Aldo Moro, 40
25124 Brescia, Italy
Tel: +39-045-2060944
Fax: +39-030-40055
ponzi.vr@ponzi.it or
luciano@ponzi.it
http://www.ponzi.it

CUNEO**Antonio Tronci (LIFE)**

Consultron Di Tronci Antonio
Via Roma 40
Cuneo, 12100 Italy
Tel: +39-017-1602954
Fax: +39-017-1697607
consultron@libero.it

FLORENCE**Alberto Paoletti (1981)**

Investigazioni Generali Informark
Via Calzaiuoli 11
Florence, 50122 Italy
Tel: +39-055-283242
Fax: +39-055-283543
info@informark.it
http://www.informark.it

GENOVA**Valerio Bottino (2013)**

Vega Investigazioni, snc
Via Fieschi, 18/7
Genova (GE), 16121, Italy
Tel: +39-010-5959049
Fax: +39-010-8687822
info@vegainvestigazioni.it
http://www.vegainvestigazioni.it

Agatino Napoleone (2005)

European Bureau Investigations SRL
Piazza Colombo 3/15 E
16121 Genoa, Italy
Tel: +39-052-2452652
Fax: +39-010-590718
info@ebisrl.eu
http://www.ebisrl.eu

Fernando Rocca (1998)

Marlowe Investigazioni
Via Cesarea 2/2
16121 Genoa, Italy
Tel: +39-010-540817
Fax: +39-010-588554
investigazioni@marlowe.it
http://www.marlowe.it

Alessandro Sarobba (1994)

POLINFORM SRL
Piazza Della Vittoria, 11/16A
16121 Genoa, Italy
Tel: +39-010-566150
Fax: +39-010-587257
info@polinform.it
http://www.polinform.it

LIVORNO**Alberto Biancofiore (1991)**

Alberto Biancofiore Radar Detectives
Scafi Del Corso 5
57123 Livorno, Italy
Tel: +39-058-6219094
Fax: +39-058-6829112
radar@radardetectives.it
http://www.radardetectives.com

Onofrio Cappiello (2002)

Euro Investigation SRL
Via Vincenzo Monti 41
20123 Milan, Italy
Tel: +39-024-8024440
Fax: +39-024-8027114
ono@federalpol.it
http://www.euroinvestigation.com

Roberto D'angelo (LIFE)

D'angelo Detective
Via Cosimo Del Fante 39
Livorno, 57123 Italy
Tel: +39-058-6883316
Fax: +39-058-6880312
roberto@dangelodetective.it
http://www.dangelodetective.it

Gianpaolo Luzzi (2012)

Confidence S.r.l.
Via dell'Artigianato 39/B Int. 8,
57121 Livorno
Tuscany, ITALY
Tel: +39-058-6822200
Fax: +39-058-6822299
gpluzzi@studioluzzi.net
http://www.confidenceinvestigazioni.net

MILAN**Laura Giuliani (2003)**

Giuliani Investigazioni
Via Giorgio Jan, 04
20129 Milan, Italy
Tel: +39-022-0404060
Fax: +39-022-0421225
info@investigazionigiuliani.it
http://www.investigazionigiuliani.it

Alberto Limone (2004)

Ulisse L. A. SRL
Piazza Quattro Novembre 4
20124 Milan, Italy
Tel: +39-014-1324274
Fax: +39-014-1091827
ulisse@investigazioneprivate.it
http://www.investigazioneprivate.it

Francesco Mangiacasale (LIFE)

Vigilar
Viale Premuda 24
Milan, 20129 Italy
Tel: +39-02-76000026
Fax: +39-02-796406
info@vigilargroup.com
http://www.vigilargroup.com

Lino Manosperiti (1991)

Centro Servizi Investigativi S.A.S.
Via B. Cellini 8
20129 Milan, Italy
Tel: +39-025-5187726 (r.a.)
Fax: +39-025-454372
csi@csinformazioni.com
http://www.csinformazioni.com

Rosario Russo (2013)

Gruppo Investigativo S.r.l.
Via Cino del Duca, n.5
Milan, 20122, Italy
Tel: +39-027-6281415
Fax: +39-027-6391517
info@gruppoinvestigativo.com
http://www.gruppoinvestigativo.it

Elisabetta Tavazzi (1992)

Organizzazione Fides Detectives
Via Benvenuto Cellini 3
20129 Milan, Italy
Tel: +39-025-456282
Fax: +39-027-00520225
info@fidesdetectives.it
http://www.fidesdetectives.it

MODENA**Marco Malavolti (LIFE)**

Sheridan Investigazioni
Via Farini 50
Modena, 41100 Italy
Tel: +39-059-225677
Fax: +39-059-216902
sheridaninv@tin.it
http://www.sheridaninv.it

NAPLES**Antonino Restino (2004)**

A-Zeta S.R.L.
Via Santa Lucia, 50
80132 Naples, Italy
Tel: +39-081-7646060
Fax: +39-081-2471160
info@azinvestigazioni.it
http://www.azinvestigazioni.it

NOVARA**Marco Manzini (2005)**

Marco Manzini Investigazioni
Via Pietro Azario N.3
28100 Novara, Italy
Tel: +39-032-1620139
Fax: +39-032-1620139
info@mminvestigazioni.it
http://www.mminvestigazioni.it

OPERA**Federico Borio (2005)**

F.B. Investigations
Via Antonio Gramsci No. 42
20090 Opera, Milan, Italy
Tel: +39-328-2529880
Fax: +39-025-8449883
intellego@msn.com

PADOVA**Vincenzo Francese (2009)**

Axerta S.p.A.
Piazza Insurrezione, 10
35139 Padova, Italy
Tel: +39-049-8750466
Fax: +39-049-8766945
vincenzo.francese@axerta.it
http://www.axerta.it

PALAZZOLO**Gianpietro Belotti (1994)**

Belotti Investigation
Via Parini 3
25036 Palazzolo, Italy
Tel: +39-030-7300521
Fax: +39-030-7300521
belotti.palazzolo@libero.it

PESCARA**Alessandro D'Amico (2010)**

D'Amico Group
Via Trieste, 125
65122 Pescara, Italy
Tel: +39-085-4429766
Fax: +39-085-7992933
info@damicogroup.it
http://www.damicogroup.it

POMEZIA**Paolo Gatti (2009)**

Cosmopol Investigazioni
Via Naro, 78
00040 Pomezia (RM), Italy
Tel: +39-069-1801069
Fax: +39-069-1601126
cosmopolsrl@inwind.it
http://www.cosmopolsrl.com

PORDENONE**Lorenzo Busetto (2010)**

Istituto Mercurio SRL
Via Gemelli, 8, 33170 Pordenone, Italy
Tel: +39-434-571660
Fax: +39-434-571306
info@istitutomercurio.it
http://www.istitutomercurio.it

PRATO**Rodolfo Rapone (1999)**

Agenzia Investigativa Pratese
Via Fratelli Giachetti No. 28/3
59100 Prato (PO), Italy
Tel: +39-057-4401179
Fax: +39-057-4404607
info@agenziainvestigativapratese.it
http://www.agenziainvestigativapratese.it

RAVENNA**Angelo Giordano (2003)**

Diag Investigazioni
Via Le Corbusier 39, 48100 Ravenna, Italy
Tel: +39-054-4270202
Fax: +39-054-4276252
diag@diag.it
http://www.diag.it

RIMINI**Fabio Del Bianco (2012)**

INDAGO
Via Flaminia Conca 35/A
47923 Rimini, Italy
Tel: +39-541-1573270
Fax: +39-541-1573270
agenzia@indago.biz
http://www.indago.biz

ROME**Giancarlo Alunno (LIFE)**

A.R.I. Agenzia Romana Investigazioni
Via Frattina 57
Rome, 00187 Italy
Tel: +39-06-6789341
Fax: +39-06-6781546
galunno@tiscalinet.it
http://www.arinvestigazioni.it

Bernardo Ferro (2005)

LA Segretissima SRL
Via San Quintino 19
00185 Rome, Italy
Tel: +39-064-744071
Fax: +39-064-744071
1922lasegretissima@gmail.com
http://www.1922lasegretissima.com

Giuseppe Mazzullo (2005)

Argo 2001 New S.R.L.
Via Dei Gracchi, 32
00192 Rome, Italy
Tel: +39-063-9738131
Fax: +39-063-9738130
argo2001new@libero.it
http://www.argo2001new.com

Arnaldo Pacifici (2000)

Europe UTD SRL
Via Dei Castani, No. 60
00172 Rome, Italy
Tel: +39-062-3219527
Fax: +39-062-3217483
invest@europeutd.com
http://www.europeutd.com

SALERNO**Marco Gallo (2007)**

ASI Global Consultants
63, Via Dei Principati
84122 Salerno, Italy
Tel: +39-089-255027
Fax: +39-089-251418
asi@investigazione.com
http://www.investigazione.com

SARDEGNA**ORISTANO****Antonio Curcu (2013)**

Global Service Italy
Via Michele Pira 8a
Oristano, 09170, Sardegna, Italy
Tel: +39-0783-463750
curcu.a@globalsecurityservice.it
http://www.globalserviceitaly.it

TORINO**Madonia Mauro (2000)**

Fox & Parker S.P.A.
Via Pio VII, 143
10127 Torino, Italy
Tel: +39-011-352535
Fax: +39-011-356667
info@fox-parker.it
http://www.fox-parker.it

TORRE BOLDONE**Pierluigi Dotti (1982)**

Dr. Pierluigi Dotti
Via Reich 10/C
Torre Boldone, 24020 Italy
Tel: +39-035-343109
Fax: +39-035-343109
ydotti@tin.it

VERONA**Luciano Ponzi (2011)**

Gruppo Ponzi Investigazioni SRL
Via Evangelista Torricelli, 35
37136 Verona, Italy
Tel: +39-045-2060944
Fax: +39-030-40055
luciano@ponzi.pro
http://www.lucianoponzi.it

JAPAN**IBARAKI-KEN****Frederick Coward, Jr. (2002)**

Investigative Services International (ISI) Corporation
Kamisawa 1023-30, Hokota-shi
Ibaraki-ken, Japan 311-2111
Tel: +808-781-8183
Fax: +253-981-8581
info@isi-corp.com
http://www.isi-corp.com

KOBE CITY**Kazushi Otsuka (2013)**

K.K. Teitan Kobe
1-14-11 Motomachidori Chuo-ku
Kobe City, 650-0022 Japan
Tel: +81-78-331-5281
Fax: +81-78-391-0336
kobe@teitan.co.jp
http://www.teitan.co.jp

KYOTO**Masaki Hayashi (2007)**

Kodama Intelligence Office Kyoto
64-10 Tatekuracho Shimagamo Sakyo-ku
606-0806 Kyoto, Japan
Tel: +81-3-5790-2550
Fax: +81-3-5790-0550
okuno_70@yahoo.co.jp
http://www.katzo.com

NAGOYA CITY**Yukie Takada (2011)**

LAS Corporation Ltd.
Showa Bld. 6F, 4-3-26, Sakae, Naka-Ku
460-0008 Nagoya City,
Aichi Prefecture, Japan
Tel: +81-5-2261-1710
Fax: +81-52-261-1740
info@lass.co.jp
http://www.lass.co.jp

OSAKA**Hiroki Uchida (1996)**

K.K. Teitan Osaka
I.K. Building 9f, 2-5-10 Korabashi,
Chuo-Ku, 541-0043 Osaka, Japan
Tel: +81-6-6226-0811
Fax: +81-6-6226-0830
chushikoku@teitan.co.jp

TOKYO**Yukinori Harada (1991)**

U Agency
2-4-2 Ginza Chuouku
104 0061 Tokyo, Japan
Tel: +81-3-3567-5165
Fax: +81-3-3567-5339
KYW02223@nifty.com

Mika Hiroshima (1996)

Hirose & Co.
4-20-1 Sendagaya, 151-0051 Tokyo, Japan
Tel: +81-3-3402-8259
mym635@am.em-net.ne.jp

Sumio Hiroshima (LIFE)

Teikoku Private Detective Agency
4-20-1 Sendagaya
Tokyo, 151-0051 Japan
Tel: +81-3-34035151
Fax: +81-3-34011948
hirosima@teitan.co.jp
http://www.teitan.co.jp

Hiroshige Ito (2005)

GK Investigation Co. Ltd.
Barbizon 3f, 1-3-1 Jinnan
Shibuya-Ku, Tokyo, Japan
Tel: +81-3-5456-0040
Fax: +81-3-5456-0041
head2009@gk-i.co.jp
http://www.gk-i.co.jp/toranomon

Hidenori Kanazawa (2006)

Kodama Intelligence Office Tokyo
Sekiguchi, Bldg 3F,
5-3-1 Higashi-nakano, Nakano-Ku
164-0003 Tokyo, Japan
Tel: +81-3-3365-0015
Fax: +81-3-3365-1750
info@kodama-group.jp
http://www.kodama-group.jp/

Shingo Kawamura (2011)

TBI Co., Ltd.
The Fourth Floor,
shyaruru Ginza 2-14-1, Ginza, Chuo-ku
104-0061 Tokyo, Japan
Tel: +81-3-6226-4110
Fax: +81-3-6226-4110
info@tbi-brothers.com
http://www.tbi-brothers.com

Goro Koyama (2010)

QiQ Research, Inc.
2-6-20-504 Kitashinjuku Shinjuku
169-0074 Tokyo, Japan
Tel: +81-3-3362-3939
Fax: +81-3-3227-1088
job@919049.com
http://www.japanpi.com

Hiroaki Masuda (1998)

K.K. Seikei Data
3-32-22 Honcho, Nakano-Ku
Tokyo, Japan
Tel: +81-3-3373-0900
Fax: +81-3-3373-1717
sd_seikei@seikei.co.jp

Yoshio Obunai (2001)

Kabushikigaisha O.R.S.
(Ohara Research Security)
Highness Lofty #602,
4-32-4 Nishi-Shinjuku
104-0061 Tokyo, Japan
Tel: +81-3-3374-0021
Fax: +81-3-3374-0131
ohara@tantei.co.jp

Hiroyuki Ono (2012)

AGEX International Inc.
3-20-6 Iwanami BLD 3F,
Higashi-Ikebukuro, Toshima-ku
Tokyo, 1700013, Japan
Tel: +81-3-3986-8878
Fax: +81-3-3986-8898
info@agex-co.com
http://www.agexintl.co.jp

Kunio Suzuki (1996)

Toyo Investigation Office
Miyashita Bldg. 301,
1-7-8 Azabu-Juban, Minato-KU
106-0045 Tokyo, Japan
Tel: +81-3-5770-5740
Fax: +81-3-5770-5741
info@toyo-inv.com
http://www.toyo-inv.com

Miharu Takahama (1996)

Teikoku Private Detective Agency
4-20-1 Sendagaya, Shibuya-Ku
151 Tokyo, Japan
Tel: +81-3-3403-5151
Fax: +81-3-3401-5948
takahama@teitan.co.jp
http://www.teitan.co.jp

Daisuke Wakiyama (2005)

D-Quest, Inc.
12F Ryumeikan-honten Bldg
3-4 Kandasurugadai, Chiyodaku
Tokyo, 101-0062 Japan
Tel: +81-3-5296-8333
Fax: +81-3-5296-8331
k_ueda@d-quest.co.jp
http://www.d-quest.co.jp/intelligence

Yoshikazu Yamazumi (1994)

Specialist Office & SIT
#804, 1-14-12 Oji, Kita-Ku
114-0002 Tokyo, Japan
Tel: +81-3-3912-6100
Fax: +81-3-3912-9721
information.1@japan-sit.com

JORDAN**AMMAN****Fares Atoum (2011)**

MENA Monitoring &
Evaluation Consultation Services
Um-Uthaina, Main Road, PO Box 710690
11171 Amman, Jordan
Tel: +1-202-643-6696
Fax: +962-6-5520153
info@menamecs.com
http://www.menamecs.com

Frederick Coward, Jr. (2002)

Investigative Services International
(ISI) Corporation
Al-Fares Building, Second Floor,
Office No. 201
Al-Shemesani Area,
Opposite Ministry of Trade & Industry
Amman, Jordan
Tel: +808-781-8183
Fax: +253-981-8581
info@isi-corp.com
http://www.isi-corp.com

Maher Al Kilani (2010)

TASKS International
Al Jubaiha
Rashad Complex 1st Floor
PO Box 4930, Yaba
11953 Amman, Jordan
Tel: +962-6-5347711
Fax: +962-65347070
maher@tasksintl.com
http://www.tasksintl.com

LATVIA**RIGA**

Vladislav Chernousov (2007)
SIA Baltic Security & Consulting
58a Bauskas Street #302
Riga, LV - 1004
Latvia
Mob: + 371 22015806
vlad@BalticSecurity.org
http://www.BalticSecurity.org

MALAWI**BLANTYRE****Neil Banda (2007)**

ND Insurance Assessors
& Private Investigators
PO Box 1215
Blantyre, Malawi
Tel: +265-888 825 107
neildenga@yahoo.co.uk

MALAYSIA**KUALA LUMPUR**

Dato Mohd Sulaiman (2001)
Corporate Risks Consulting SDN BHD
10 Jalan Setiakasih Enam,
Damansara Heights
50490 Kuala Lumpur, Malaysia
Tel: +60-12-2006015
Fax: +60-3-20940179
dmsom@pc.jaring.my
http://www.corporaterisks.com.my

SELANGOR**Dr. Tuck Yew Choong (2003)**

C & C Investigation Services SDN. BHD.
4 Jalan 19/30, Sea Park
46300 Petaling Jaya, Selangor, Malaysia
Tel: +60-12-2787373
Fax: +60-3-79566682
choongmalaysia@gmail.com

Edmund De Run (2004)

Smartguard SDN BHD
No. 97A, Jalan Gasing
46000 Petaling Jaya, Selangor, Malaysia
Tel: +60-3-79575750
Fax: +60-3-79577050
edmund_angie@yahoo.com
http://www.smartguard.com.my

Dato Teck Hooi How (2004)

Special Squad Security Services SDN BHD
2nd-3rd Floor, Bangunan T.H.How,
45 Jalan Kenari 17f
47100 Bandar Puchong Jaya, Malaysia
Tel: +60-3-80708888
Fax: +60-3-80706668
sssssb@ymail.com
http://www.specialsquad.com

Cheng Hock Lim (2001)

Asset Management &
Protection Services SDN BHD
Lot 17507, Taman Selayang Baru
Industrial Estate, 8.1/2 Miles Jalan Ipoh
68100 Batu Caves, Selangor, Malaysia
Tel: +60-3-61202615
Fax: +60-3-61203615
chlim@amps.com.my
http://www.amps.com.my

M. Barathan Muniandy (2009)

Handal Asia Pacific SDN. BHD.
No. 111, Jalan Puteri 5/7 Bandar Puteri
47100 Puchong, Selangor, Malaysia
Tel: +60-3-80628360
Fax: +60-3-80628350
barat@handalgroup.com
http://www.handalgroup.com

Siti Subaidah Naidu (1998)

Corporate Risks Consulting SDN BHD
C-2-28, Block C,
8 Avenue Business Center
Jalan Sg Jernih 8/1 Section 8
46050 Petaling Jaya, Selangor,
Darul Ehsan, Malaysia
Tel: +60-3-79569989
Fax: +60-3-79568986
adiln@corporaterisks.com.my
http://www.corporaterisks.com.my

**MARIANA ISLANDS
NORTHERN****SAIPAN****R P (DOC) Murdock (2008)**

Murdock & Co., LLC
PO Box 10,000, PMB 515 PPP
Saipan, 96950 CNMI (MP)
Tel: +1-210-787-3487
doc@murdockandco.com
http://www.murdockandco.com

MALTA**SLIEMA****Hermann Kaminski (2002)**

IWA Group (International) Malta
PO Box 43, Sliema, Malta SLM 1203
Tel: +356-23 262 000
Fax: +356-2326-2119
herm.kaminski@gmail.com
http://www.iwa-group.com

MEXICO

MEXICO CITY

Fernando Molina (1999)

Incomer International, S.A.
 Empresa 186-302, Col.Extremadura Insurgentes
 DF 03740 Mexico City, Mexico
 Tel: +52-555-5637081
 Fax: +52-555-5636849
 fernando@incomer.com.mx
 http://www.incomer.com.mx

SAN MIGUEL DE ALLENDE

Mike McHenry (1976)

Mexico Investigations
 Aldama, 3, Col. Centro
 San Miguel De Allende
 GTO, CP 37700 Mexico
 Tel: +52-415-152-7757
 services@mexinv.com
 http://www.mexicoinvestigations.com

TIJUANA

Rafael Suastegui (2007)

Agencia De Investigaciones
 (Multiple Investigation Agency)
 Morelos # 5 Fracc. Hipodromo II
 22480 Tijuana, B.C., Mexico
 Tel: +52-664-6224873
 Fax: +52-664-6814621
 suasilla@hotmail.com
 http://www.investigacionesmultiples.com.mx

MOLDOVA

CHISINAU

Aurel Simion Leahu (2012)

S.C."Investigatii Private" S.R.L.
 bd. St. cel Mare 202, et.1, Kentford Build.
 Chisinau, Moldova
 Tel: +373-22-74-44-09
 Fax: +373-69-15-06-91
 info@detectivmold.com
 http://www.detectivmold.com

KISHINEV

Sergei Ustimenco (2011)

JUSTAR Security Co., SRL
 Street A. Russo, 1 Office, 504
 2068 Kishinev, Republic Moldova
 Tel: +373-22-43-84-50
 Fax: +373-22-43-84-50
 office@justar.md
 http://www.justar.md

NETHERLANDS

ALMERE

Richard Franken (2011)

Hoffmann Investigations
 PO Box 60090, 1320 AB Almere, Netherlands
 Tel: +31-365-233000
 Fax: +31-365-233033
 r.franken@hoffmannBV.nl
 http://www.hoffmannBV.nl

BREDA

Aad Schalke (1992)

Schalke & Partners
 Brugsteen 6, Breda 4815 PL, Netherlands
 Tel: +31-765-221144
 Fax: +31-765-221264
 aad@schalke.nl
 http://www.schalke.nl

Jan Stekelenburg (1991)

Stekelenburg S.O.B. BV
 Dr. Struckestraat 96
 4812 BH Breda, Netherlands
 Tel: +31-765-237099
 Fax: +31-765-237090
 jstekelenburg@stekelenburg.nl
 http://www.stekelenburg.nl

Norma Stekelenburg (2000)

Stekelenburg S.O.B. BV
 Dr. Struckestraat 96
 4812 BH Breda, Netherlands
 Tel: +31-715-237099
 Fax: +31-765-237090
 info@stekelenburg.nl
 http://www.stekelenburg.nl

CAPELLE AAN DEN IJSSEL

Christiaan Blomjous (2011)

CED Forensic B.V.
 Rietbaan 40-42
 2908 LP Capelle aan den IJssel, Netherlands
 Tel: +31-102-843790
 Fax: +31-102843789
 chris.blomjous@ced-forensic.nl
 http://www.ced-europe.com

EIBERGEN

Willem De Hoog (2006)

Vidi Expertise BV
 Mors 11, PO Box 56, 7150 AB
 7151 MX Eibergen, Netherlands
 Tel: +31-545-468080
 Fax: +31-545468088
 wimdehoog@vidi-expertise.nl
 http://www.vidi-expertise.nl

HEERHUGOWAARD

Gert Van Zwienen (1999)

DEKRA Investigations
 Deimoslaan 5
 1702 CK Heerhugowaard, Netherlands
 Tel: +31-725-757815
 Fax: +31-725757858
 gert.vanzwienen@dekra.com

KA LEYSTAD

Jacob Verboom (2011)

International Security Partners, B.V.
 DeSchans 19-21
 8231 KA Lelystad, Netherlands
 Tel: +31-320-284141
 s.verboom@ispbv.nl
 http://www.ispbv.nl

PAPENDRECHT

Hesder du Fijn (1988)

RiskSurvey International
 PO Box 128
 Papendrecht, 3350 AC, Netherlands
 Tel: +31-78 7070136
 rmginfra1@gmail.com
 http://www.rmginfra.nl

SCHIPHOL-RIJK

Steven Kuster (2010)

AcuteQuest
 Beechavenue 54-80
 1119 PW Schiphol-Rijk, Netherlands
 Tel: +31-206-586142
 Fax: +31-206586111
 skuster@acutequest.com
 http://www.acutequest.com

THE HAGUE

W.P. Bongers (LIFE)

International Recherchebureau
 Niewendamlaan 19
 The Hague, 2547 JH Netherlands
 Tel: +31-70-3683800
 Fax: +31-70-3253438

WASSENAAR

Eduard Emde (2012)

BMK ISS Europe
 PO Box 2085
 2240 NL CB Wassenaar, Netherlands
 Tel: +31-708-872084
 Fax: +31-708872962
 e.emde@bmkiss.eu
 http://www.bmkiss.eu

ZUIDLAND

Jan Willem Vermaat (2012)

Security Consultancy Bureau JWW
 PO Box 7
 3214 ZG Zuidland, Netherlands
 Tel: +31-181-657404
 Fax: +31-181657404
 info@securitybureaujww.nl
 http://www.securitybureaujww.nl

NEW ZEALAND

AUCKLAND

Daniel Thompson (1980)

Thompson & Toresen
 PO Box 422
 Auckland, 1140 New Zealand
 Tel: +64-9-3576644
 Fax: +64-9-2928046
 dan.thompson@theinvestigators.co.nz
 http://www.theinvestigators.co.nz

Daniel Thompson-Toresen (2009)

Thompson and Toresen
 PO Box 422, Shortland St.
 Auckland NZ 1010, New Zealand
 Tel: +64-9-357-6644
 Fax: +64-9-292-8046
 danny@theinvestigators.co.nz
 http://www.theinvestigators.co.nz

CHRISTCHURCH

Verdi Van Beek (1992)

Avon Investigations
 PO Box 5318, Papanui
 Christchurch, New Zealand
 Tel: +64-3-355-4010
 Fax: +64-3-355-4010
 verdi@clear.net.nz

TAURANGA

Michael Keaney (2001)

Advance Investigation Ltd.
 PO Box 9169
 3142 Tauranga, New Zealand
 Tel: +64-7-579-6420
 Fax: +64-7-579-5183
 investigate@advancegroup.co.nz
 http://www.advancegroup.co.nz

WELLINGTON

Trevor Morley (1983)

Morley Security &
 Investigation Group Ltd.
 PO Box 221
 Wellington, 6140 New Zealand
 Tel: +64-4-4711663
 Fax: +64-4-4711330
 twam@clear.net.nz
 http://www.morleysecurity.com

NIGERIA

LAGOS

Theophilus Akhigbe (2012)

Theosearch International Ltd.
 18 University Road
 Lagos, 101011, Nigeria
 Tel: +234-803-7269998 mobile
 Fax: +234-803-7269998
 takhigbe@yahoo.com

Israel Mbachu (1996)

J.C. Owens Investigation, Inc.
 Centage Plaza,
 Ste. 405 & 406,
 14 Allen Ave.
 Ikeja, Lagos, Nigeria
 Tel: +1 610-383-4117 USA
 Fax: +1-610-383-7114 USA
 Jcowensinv@aol.com
 http://www.jcowensglobalconsulting.com

Johnson Okebukola (1998)

Johnson Okebukola Esq. Legal
/Security Consultant Nigeria
2a. Oladejo / Sanyaolu St., Oko-Oba,
Agege, Box 11780 Ikeja
Lagos, Nigeria
Tel: +234-803-4029009
aptchamber@aol.com
or aptchambers@live.co.uk
http://www.aptconsultancy.com

NORWAY**BERGEN****Hans Salbu (2012)**

Periculo AS
PO Box 58
5857 Bergen, Norway
Tel: +47-95858912
hans@periculo.no
http://www.periculo.no

OSLO**Kjetil Eide (1994)**

Sikrings Service AS
PO Box 782 sentrum.
0106 Oslo, Norway
Tel: +47-91812121
eide@utreder.no
http://www.sikringservice.no

Gard Westbye (1996)

Gard Westbye
PO Box 1402 Vika, Fr. Nansenspl.9
0115 Oslo, Norway
Tel: +47-22411060
Fax: +47-22410550
post@ope.no
http://www.ope.no

PAKISTAN**KARACHI****Osman Ali Malik (2004)**

Security 2000 (PVT) Ltd.
1 Anjum Plaza, Shahrah-e-Quaideen,
PECHS Block 2, 75400 Karachi, Pakistan
Tel: +92-21-111-00-2000
Fax: +92-21-3454-9554
osman@security2000.com
http://www.security2000.com

Brig. Gen.(Retd.) Rashid Ali Malik (1997)

Security 2000 (PVT) Ltd.
1 Anjum Plaza, Shahrah-e-Quaideen,
PECHS Block 2, 75400 Karachi, Pakistan
Tel: +92-300-822-7007
Fax: +92-21-3454-9554
rashid@security2000.com
http://www.security2000.com

LAHORE**Khalid Hussain (2006)**

Security 2000 (PVT) Ltd.
147-P, Gulberg-III, Lahore, Pakistan
Tel: +92-42-585-1595
Fax: +92-42-585-7159
khalid@security2000.com
http://www.security2000.com

PANAMA**PANAMA****Brett Mikkelson (2006)**

B.M. Investigations, Inc.
Calle 8, Casa 687, Las Cumbres
Panama City, Republic of Panama
Tel: +507-268-2530
Fax: +507-268-1680
brett@bminvestigations.com
http://www.bminvestigations.com

PARAGUAY**ASUNCION****Mark McCabe (1992)**

McCabe Associates, Inc.
25 de Mayo 2037 c/Mayor Bullos
Asuncion, Paraguay
Tel: +595-21-453503
Fax: +595-21-233-940
sholscher@mccabe1.com
http://www.mccabe1.com

PERU**LIMA****Pedro Delgado (2012)**

Asesoria General Privada
Ave. Larco 1150 Office 704
Miraflores
Lima 18, Peru
Tel: +51-1-2248852
agpperu@agpperu.com.pe
http://www.agpperu.com.pe

Mark McCabe (2010)

McCabe Associates, Inc.
Edificio Cronos, torre 1, Piso 7
Santiago de Surco, Lima, Peru
Tel: +511-716-2725
Fax: +511-716-2601
sholscher@mccabe1.com
http://www.mccabe1.com

PHILIPPINES**LAS PINAS CITY****Danilo Mendez (LIFE)**

United Philippine Scouts Veterans
Detective & Protective Agency, Inc.
#8 Gemini St.,
Pamplona Park Subdivision
Pamplona, Las Pinas City
1701 Philippines
Tel: +63-2874-4339
Fax: +63-2874-5389
upsvedpa_inc@yahoo.com

MAKATI CITY**Graeme Campbell (2009)**

Pacific Strategies & Assessments
36F, Tower One
The Enterprise Center,
6766 Ayala Avenue Corner
1200 Makati City
Metro Manila, Philippines
Tel: +63-2-843-6856
Fax: +62-3-846-6854
graeme.campbell@psagroup.com
http://www.psagroup.com

Jeffrey Williams (2005)

Orion Support Incorporated (OSI)
4/F Accelerando Building,
395 Sen Gil J. Puyat Ave.
1200 Makati City
Metro Manila, Philippines
Tel: +63-2-890-3090
Fax: +63-2-895-6859
jwilliams@osi.com.ph
http://www.osi.com.ph

MANDALUYONG CITY**Ernesto Medina (LIFE)**

Asiadetectives, Inc.
37 Apo Street
Mandaluyong City
1550 Philippines
Tel: +63-2-531-2574
Fax: +63-2-531-3512
detectiv@pworld.net.ph
http://www.asiadetectives-phil.com

METRO MANILA**Conrado Dumlao (LIFE)**

Truth Verifier Systems, Inc.
2/F, Cityland Bldg., 128 Pioneer St.,
Mandaluyong City
Metro Manila, 1550 Philippines
Tel: +63-2-634-7571
Fax: +63-2-634-7569
truth@mozcom.com
http://www.truthverifier.com

QUEZON CITY**Sheryll Ingan (2005)**

Eyespy Detectives & Investigators
G/F 100K Tower #100 Kamias Rd.
1102 Quezon City
Metro Manila, Philippines
Tel: +63-2-920-9088
Fax: +63-2-920-6034
eyespy@philippinedetectives.com
http://www.philippinedetectives.com

Antonio Maniwang (2011)

Security & Safety Corporation
of the Philippines
Marius Business Center,
75 F. Manalo Street, Cubao
1111 Quezon City
Metro Manila, Philippines
Tel: +63-2-705-1654
Fax: +63-2-705-1652
tvmaniwang@yahoo.com
http://www.sscphils.com

POLAND**CZLUCHOW****Artur Janta-Lipinski (2009)**

Contra Risk Management
Ul Chojnicka 2
77-300 Człuchów, Poland
Tel: +48-50-178-14-15
Fax: +48-59-726-80-16
office@contra-riskmanagement.pl
http://www.contra-riskmanagement.pl

KOLOBRZEG**Mirosław Tomczyk (1994)**

Inter Invest TM
Ul Nowogrodzka 4 / 16
78-106 Kolobrzeg, Poland
Tel: +48-94-354-33-00
Fax: +48-94-354-33-00
iitm@wp.pl

LODZ**Krzysztof Szaruga (2013)**

Central Bureau of Detectives
Tybury 1/38
Lodz, 91-043, Poland
Tel: +48-72-399-79-97
biuro@cbd.net.pl
http://www.cbd.net.pl

Zenon Zalewski (2005)

Inter Securus
AL. Kościuszki 1
90-418 Łódź, Poland
Tel: +48-42-630-38-82
Fax: +48-42-632-11-56
zz@inter-securus.pl
http://www.inter-securus.pl

WARSAW**Tomasz Mostowski (2012)**

CEE Consulting Group Sp. z o.o.
Nowogrodzka 7/9, lok. 44
00-513 Warsaw, Poland
Tel: +48-72-822-12-21
Fax: +48-22-295-19-09
tomasz.mostowski@ceeconsultinggroup.com
http://www.ceeconsultinggroup.com

Bartosz Pastuszka (2011)

IBBC Group
Al. Szucha 11B/23
00-582 Warsaw, Poland
Tel: +48-22-203-53-71
Fax: +48-22-203-53-72
office@ibbcgroup.com
http://www.ibbcgroup.com/en.html

Jaroslaw Rangotis (2004)

Asvalia Detective Agency
77 Grzybowska Street, 4th Flr.,
Bellona Office Bldg.
00-844 Warsaw, Poland
Tel: +48-22-112-06-50
Fax: +48-22-112-06-70
m.chajec@asvalia.com.pl
http://www.asvalia.com.pl

PORTUGAL**GAMBELAS****Roy Whitehouse (1996)**

W.I.S. International
Rua dos Malmequeres,
Bloco H, Loja Nº 4
8005-214 Gambelas, Faro, Portugal
Tel: +351-28-936-9180
Fax: +351-28-926-9182
info@wis-int.com
http://www.wis-int.com

LISBON**J. Morgado Ribeiro (1987)**

Grupo 8
Av. Estados Unidos Da America 23-1
Lisbon, 1749-089 Portugal
Tel: +351-21-843-2804
Fax: +351-21-849-3248
grupo8@grupo8.pt
http://www.grupo8.pt

Paulo Perdigão (2010)

Civil Intelligence - Private Detectives
C. Escritórios Benfica
Rua Jorge Barradas, 34 Lj. Sala 19
1500-371 Benfica, Lisbon, Portugal
Tel: +351-21-038-1110
info@inteligenciacivil.com
http://www.inteligenciacivil.com

MAIA**Fernando Oliveira (2009)**

Agência de Investigação Fernando Oliveira
Tr. Dr. Carlos Felgueiras 12-A,
5th Floor, Office A
4700-158 Maia, Portugal
Tel: +351-22-948-3092
Fax: +351-22-948-3092
contacto@detectiveoliveira.com
http://www.detectiveoliveira.com

PORTO**Cristina Potau (2012)**

Potau Detectives
Rua Nova da Alfandega nº 37, 2 andar
Porto, 4450452, Portugal
Tel: +35-1969788010
Fax:
info@potaudetectives.com
http://www.potaudetectives.com

PUERTO RICO**CAROLINA****Fernando Fernandez-Correa (2009)**

Covert Intelligence LLC
PO Box 6022, PMB 255,
00984-6022 Carolina, Puerto Rico
Tel: +1-787-603-4504 mobile
Fax: +1-952-216-8998
covertintelligence@yahoo.com
http://www.covertintelligencegroup.com

ROMANIA**BACAU****Vasile Tanase (2013)**

Cabinet Individual Detectiv
Particular "Tanase V. Iulian"
Str. Veniamin Costache 11, A/4
Bacau, 600275, Romania
Tel: +40-234588570
jt@eurosurveillance.net
http://www.eurosurveillance.net

BUCHAREST**Maria Bumbu (2010)**

Axom Romagent
BD.DECEBAL NR.4, BL.S.11,SC.A, AP.18
030965 Bucharest, Romania
Tel: +40-21-3202143
Fax: +40-21-3277410
mariabumbu@gmail.com
http://www.romagent1.ro

Andreea Dobrescu (2011)

Total Trust Investigations
45 Londra Street, District 1
011762, Bucharest, Romania
Tel: +40-21-2300577
Fax: +40-21-2319020
ad@totaltrustinvestigations.com
http://www.totaltrustinvestigations.com

Mihai Marcusanu (2013)

Manigordo Grup Investigations
Bd. Chisinau 8, bl. M2. ap. 67, sector 2
022153 Bucharest, Romania
Tel: +40-73-7204450
Fax: +40-31-4225211
office@manigordogrup.ro
http://www.manigordo.ro

Claudiu-Gabriel Pintilie (2012)

SC Compania De Detectivi Nei SRL
121 Jiului Street, Ap. 3, District 1
Bucharest, Romania
Tel: +40-73-1230202
Fax: +40-21-2325555
office@detectivinei.ro
http://www.detectivinei.ro

Ion Sandu (2012)

SC Compania De Detectivi Nei SRL
121 Jiului Street, Ap. 3, District 1
Bucharest, Romania
Tel: +40-73-1678382
Fax: +40-21-2325555
detectivi.nei@gmail.com
or office@detectivinei.ro
http://www.detectivinei.ro

Ioan Todea (2007)

Total Trust Investigations
45 Londra Street, District 1
011762 Bucharest, Romania
Tel: +40-21-2300577
Fax: +40-21-2319020
office@totaltrustinvestigations.com
http://www.totaltrustinvestigations.com

CONSTANTA**Bogdan Nicolau (2012)**

O.M.O. Confidential RO SRL
Str. B.P. Hasdeu Nr. 112A, Building L6
Suite 19, 900382 Constanta, Romania
Tel: +40-72-5482270
office@omo-confidential.ro
http://www.omo-confidential.ro

GALATI**Genovi Leon Mocanu (2010)**

Agentia Heraclis
Str. Cosminului, Nr:19, BL:I6B/3
Galati, 800432, Romania
Tel: +40-78-6528833
office@heraclis.ro
http://www.heraclis.ro

PANTELIMON**Dan Rusu (2011)**

Eagle Security International
75/17 Cernica Str.
Pantelimon RO 077145 Romania
Tel: +40 74-7126405
Fax: +40-21-3156681
office@eaglesecurity.eu or
danrusu@eaglesecurity.eu
http://www.eaglesecurity.eu

PITESTI**Guta Ionut (2011)**

Intell Investigation
2-4 Gheorghe Doja Street
110253 Pitesti
AG, Romania
Tel: +40-34-8430858
Fax: +40-34-8430858
office@intelldetectivi.ro
http://www.intelldetectivi.ro

TIMISOARA**Sorin Matei (2013)**

C.I.D.P. Matei Sorin
"EaGle Office Private Detective"
7 Proclamatia de la Timisoara,
Timisoara, 300708
Romania
Tel: +40-35-6418422
Fax: +40-73-1599967
office@detectivtm.ro
http://www.detectivtm.ro

RUSSIA**ASTRAKHAN CITY****Fedor Klochkov (2009)**

Volga Shield
38 Boevaya St.
414024 Astrakhan City, Russia
Tel: +7-851-250-1313
Fax: +7-851-250-0460
volga-shield@mail.ru
http://www.volga-shield.com

EKATERINBURG**Sergey Cherkasov (2005)**

Saturn Security Association
40 Vainera Street
620014 Ekaterinburg, Russia
Tel: +7-343-376-5109
Fax: +7-343-376-5110
saturn@infoural.com
http://www.saturn-ural.ru

KAZAN**Vyacheslav Rechetnik (2009)**

PI Reshetnik
8 Khalitova St., Office 4/11
420088 Kazan, Russia
Tel: +7 843-267-4393
Fax: +7-843-279-5266
pdkazan@gmail.com
http://www.pdkazan.ru

MOSCOW**Mikhail Balev (2013)**

MIG
6, 5th Verkhniy Mikhailovsky passage
Moscow, 115419, Russia
Tel: +7-495-981-0057
Fax: +7-495-981-0057
m_balev@mig.ru
http://www.mig.ru

Vladimir Filchenko (2007)

LLC Alternativa-Consultinform
62-40 Leningradsky Prospect
125167 Moscow, Russia
Tel: +7-903-960-6823
Fax: +7-495-676-0946
bizinrusec@yandex.ru
http://www.alternativa-m.com

Aleksey Korelov (2005)

Techelite Group Of Security Companies
48, house 112, Chechersky pr.
117042 Moscow, Russia
Tel: +7-495-921-6175
techelit@gmail.com

Alexandr Krioni (2003)

Krioni Detective Agency
34 Narodnogo Opolcheniya Str., Office 148
123423 Moscow, Russia
Tel: +7-495-799-5799
Fax: +7-499-946-9574
alex@krioni.com
http://www.detectiveagency.org

Sergey Morozov (1998)

Business Security Holding Alternativa-M
17 Building 1, Volgogradskij Ave.
109316 Moscow, Russia
Tel: +7-495-676-9079
Fax: +7-495-676-0946
altcon@cea.ru
http://www.alternativa-m.com

Alexey Solomanidin (2012)

Vlasta-Consulting Ltd.
10 Building
2 Bolshoy Znamenskiy Lane Str.
119019 Moscow, Russia
Tel: +7-495-984-8483
Fax: +7-495-984-8483
alexey.solomanidin@vlasta-s.com
http://www.vlasta-s.com

Vladimir Solomanidin (1998)

Vlasta-Consulting Ltd.
10 Building
2 Bolshoy Znamenskiy Lane Str.
119019 Moscow, Russia
Tel: +7-495-984-8483
Fax: +7-495-984-8483
info@vlasta-s.com
http://www.vlasta-s.com

Anatoly Voitsekhovski (2004)

Strike Detective Service LLC
16 Bldg., H.11
Derbenevskaya Nab.m.box92
115114 Moscow, Russia
Tel: +7-495-258-7611
Fax: +7-495-727-9050
detectivevaa@mail.ru
http://www.strike-security.ru

Vladimir Zelensov (2010)

Detective Agency Status Ltd.
Bolshaya Yakimanka Street,
Bldg. 24, Off. 511, 119134 Moscow, Russia
Tel: +7-495-651-0716
Fax: +7-499-271-2928
info@status-da.ru
http://www.status-da.ru

Oleg Zimin (2001)

ZOV Investigation Agency
Razinskoe shosse 5
143956 Balashikha,
Moscow region, Russia
Tel: +7-495-792-8674
Fax: +7-495-529-5021
zov@detective-zov.ru
http://www.detective-zov.ru

NAHABINO**Serguei Stepnov (1995)**

Private Investigative Agency Lions
Novaya, 8, Apt. 190
Moscow Region, Rrasnogorskiy Area
Nahabino, Russia
Tel: +7-495-566-3822
Fax: +7-495-688-2053
lions@lions.ru
http://www.lions.ru

NOVOSIBIRSK**Alexey Scherbenev (2004)**

Association of Private Detectives "Abb"
1/2 Vladimirovskaya St.
630003 Novosibirsk, Russia
Tel: +7-383-218-0521
Fax: +7-383-218-0521
abb_international@yahoo.com
or abb.nsk@mail.ru
http://www.abb.fis.ru

RYAZAN**Nikolay Dryzhinin (2001)**

Liga Bezopasnosti Association of
Private Detective Enterprises
Moscovskoe Shosse 16
390044 Ryazan, Russia
Tel: +7-091-253-4703
Fax: +7-091-227-6862
kipsey@mail.ryazan.ru

SAINT PETERSBURG**Andrey Volkov (2013)**

Alibi Agency
Poltavskaya Street 6,
The Business Center of Poltava, Office 108
Saint Petersburg, Russia
Tel: +7-812-454-1699
alibi.russia@gmail.com
http://www.detective1997.ru

TATARSTAN**Evgeniy Shchepin (2011)**

Private Detective Evgeniy Shchepin
Absaljamova st., h. 13, of.129, Kazan
420066 Tatarstan, Russia
Tel: +7-929-729-2999
afb.kazan@yandex.ru
http://www.detective-kazan.ru

UFA**Vitaliy Klimin (2011)**

Detective Agency Klimin & Partners
Bakalinskaya St., House 25, Apartment 650
450022 Ufa, Republic Bashkortostan, Russia
Tel: +7-917-459-1995
Fax: +7-901-817-1911
detectivekv@gmail.com
http://www.detective-kv.com

SAUDI ARABIA**RIYADH****Tariq Deyab (2008)**

KAD & Co. International
PO Box 26034
11486 Riyadh, Saudi Arabia
Tel: +966-1-292-2225
Fax: +966-1-292-1599
tdeyab@kad-ip.com
http://www.kad-ip.com

SINGAPORE**SINGAPORE****Wilfred Anthony ((LIFE)**

Anthony's Special Investigation
Service Pte. Ltd.
16-A Madras Street
208413 Singapore
Tel: +65-6392-3913
Fax: +65-6392-4282
asis@pacific.net.sg
http://www.asis.com.sg

Daniel Dawson (1994)

Noble Security Management Services Pte. Ltd.
10 Jalan Besar Rd, #08-02 Sim Lim Tower
208787 Singapore
Tel: +65-6336-8433
Fax: +65-6337-3043
noble9@pacific.net.sg

Ponnosamy Kalastree (1981)

Mainguard International (S) Pte. Ltd.
5001 Beach Rd. #08-09, Golden Mile Complex
199588 Singapore
Tel: +65-6296-5881
Fax: +65-6296-1171
mainguard@mainguard-intl.com.sg
http://www.mainguard-intl.com.sg

Lawrence Koh (2003)

SK Investigation Services
511 Guillemard Rd., #01-31 Grandlink Square
399849 Singapore
Tel: +65-6440-4683
Fax: +65-6841-1334
sksis@singnet.com.sg
http://www.sk.com.sg

Perumal Kumar (2011)

Scorpius Security and
Investigation Services Pte. Ltd.
170 Upper Bukit Timah Road
10-02, Bukit Timah Shopping Centre
588179 Singapore
Tel: +65-6769-9975
Fax: +65-6762-4139
nk@scorpius.com.sg
http://www.scorpius.com.sg

David Rule (2012)

Xione Group Pte. Ltd.
8A Canton Street
Singapore 049748 Singapore
Tel: +65-9017-4542
davidr@xionegroup.com
http://www.xionegroup.com

KB Tan (2010)

CDiC Consultants LLP
164 Bukit Merah Central #04-3645
150164 Singapore
Tel: +65-6377-2723
Fax: +65-6377-2726
enquiry@cdic.com.sg
http://www.cdic.com.sg

Marcus Tan (2013)

Orion Asia Consulting
5 Kaki Bukit Road, 2, # 13-37
417835 Singapore
Tel: +65-6602-8144
Fax: +65-6542-7392
marcus@orionasiaconsulting.com
http://www.orionasiaconsulting.com

Vincent Tan (2002)

Commercial Investigations LLP
12 Prince Edward Road,
#06-18 Bestway Building Podium B
079212 Singapore
Tel: +65-6225-9909
Fax: +65-6221-1131
investigations@cpis.com.sg
http://www.cpis.com.sg

SLOVENIA**LJUBLJANA****Helena Dvorsak (2007)**

Detektivska Agencija AHD
Dunajska cesta 158 (WTC Bldg.)
SI-1000 Ljubljana, Slovenia
Tel: +38-615-685100
cdsgit-2.net
http://www.detektivka.si
http://www.detektivka.eu

Denis Novak (2012)

Detektivska Agencija Vestigium, d.o.o.
Dunajska cesta 158
1000 Ljubljana, Slovenia
Tel: +38-641-703094
denis.novak@da-vestigium.si
http://www.da-vestigium.si

SOUTH AFRICA

JOHANNESBURG

Peter Grant (1991)

C Risk International (Pty) Ltd.
PO Box 3137, Randburg
2125 Gauteng, Johannesburg, South Africa
Tel: +27-12-644-1616
Fax: +27-12-349-9130
pgrant@crisk.co.za

Werner Meisch (LIFE)

Investigation & Security Services CC
PO Box 5922
Johannesburg, 2000 South Africa
Tel: +27-11-4037060
Fax: +27-11-3393593
ispy@icon.co.za

Warren Neal (2011)

Saraband Solutions CC
t/a Saraband International
PO Box 3373, 2060 Cramerview,
Johannesburg, South Africa
Tel: +27-11-462-7670
Fax: +27-11-866-878281
warren@saraband.co.za
http://www.saraband.co.za

MIDRAND

Douglas McGibbon (2005)

LGI Consultants CC
PO Box 7879, Halfway House
1685 Midrand, South Africa
Tel: +27-11-314-1884
Fax: +27-11-314-1908
doug@lagarde.co.za
http://www.lagarde.co.za

PRETORIA

Andrey Grudko (1994)

Grudko Associates
PO Box 335, Broederstroom
0240 Pretoria, South Africa
Tel: +27-12-244-0255
Fax: +27-12-244-0256
agrudko@icon.co.za
http://www.grudko.co.za

SOUTH KOREA

SEOUL

John Ahn (2005)

Teamone Security Co., Ltd.
1F., Dong Yang Bldg.
240-4, Jamsil-Dong, Songpa-Ku
138-864 Seoul, South Korea
Tel: +82-2-419-8620
Fax: +82-2-2203-3764
bmijohn@unitel.co.kr

Jung-Nam Chi (2007)

Providers Korea
202 Uijuro 1-ga, Jung-gu
Suite 314, Fraser Place Central Seoul
100-130 Seoul, South Korea
Tel: +82-2-777-5767
Fax: +82-2-777-5768
prochi@providers.co.kr
http://www.providers.co.kr

SPAIN

ALICANTE

Agustin Belles Sostrot (2011)

Detectives Grupo 2
C/ Reina Victoria, 58
03201 Elche, (Alicante), Spain
Tel: +34-965431554
Fax: +34-966092933
agustin@detectivesgrupo2.com
http://www.detectivesgrupo2.com

BARCELONA

Carina Villena Barjau (2008)

Villena Detectives Asociados
Rambla de Catalunya, 5, 3o 2a
08007 Barcelona, Spain
Tel: +34-933015101
Fax: +34-934124109
carina@detectivesvillena.com
http://www.detectivesvillena.com

F. Aaron Garcia-Garrido (LIFE)

Aaron Detectives, S.A.
Aaron House - 1899, Barcelona, 08035 Spain
Tel: +34-93-217-8900
Fax: +34-93-217-8900
aaron@potosi.com

Francisco Marco (1998)

Metodo 3, S.A.
Avenida Diagonal 520 2º 4º
08006 Barcelona, Spain
Tel: +34-933232148
Fax: +34-934531739
mail@metodo3.es
http://www.metodo3.es

Cristina Potau (2012)

Potau Detectives
Gran Via De Les Corts Catalanes
524 Entresuelo 2A, Barcelona, 08011, Spain
Tel: +34-932001900
info@potaudetectives.com
http://www.potaudetectives.com

Hugo Sanmartin Cotti (1994)

Grupo Has S.A.
Edificio Apolo X, pl. 6ª,
Balmes, 196 - 200, 6th Flr.
08006 Barcelona, Spain
Tel: +34-934160001
Fax: +34-934160005
has@has.es
http://www.has.es

David Sanmartin Olivier (1994)

Grupo Has S.A.
Edificio Apolo X, pl. 6ª,
Balmes, 196 - 200, 6th Flr.
08006 Barcelona, Spain
Tel: +34-934160001
Fax: +34-934160005
dsanmartin@has.es
http://www.has.es

SPAIN

CANARY ISLANDS

Julio Gutiez Cuevas (2005)

Mira Detectives Privados
Calle San Agustin, 13 - 3o 6
35001 Las Palmas, Canary Islands, Spain
Tel: +34-917581880
Fax: +34-928339155
miradetectives@miradp.com
http://www.miradp.com

Manuel Torres (1990)

M. Torres & Assocs. Prof. Investigations
C/Pilarillo Seco 8, Ste. 10, Santelmo Park
Las Palmas De Gran Canaria
35002 Las Palmas, Canary Islands, Spain
Tel: +34-928367345
Fax: +34-928367345
ic@torresdetective.com
http://www.torresdetective.com

MADRID

Eva Grueso Domínguez (2010)

Ascom Detectives Privados S.L.
C/Pedrezuela 1, despacho 116
28925 Madrid, Spain
Tel: +34-916797644
Fax: +34-911291916
soporte@ascomdetectives.com
http://www.ascomdetectives.com

Rafael Guerrero Maroto (2005)

Agency World Inv.
Paseo De La Castellana 164,
Planta 1
28046 Madrid, Spain
Tel: +34-902887554
Fax: +34-911413241
info@agencyworld.org
http://www.agencyworld.org

Jose Pimentel Moralo (1999)

Detectives Spain
PO Box 36.459
28080 Madrid, Spain
Tel: +34-902444434
Fax: +34-913956396
info@detectives-spain.com
http://www.detectives-spain.com

Cesar Martin Polvorinos (2007)

Castellana Detectives
CI Orense No. 6 Floor 11of A3
28020 Madrid, Spain
Tel: +34-915980590
Fax: +34-915980591
cesar@castellanadetectives.com
http://www.castellanadetectives.com

Javier Martinez-Llorente (1995)

Monopol, S.L.
Paseo Recoletos 21
28004 Madrid, Spain
Tel: +34-915213150
Fax: +34-915218599
monopol@monopol.es
http://www.monopol.es

Cristina Potau (2012)

Potau Detectives
Calle Añastro nº 13, 1º B
Madrid, 28033, Spain
Tel: +34-91-3838589
info@potaudetectives.com
http://www.potaudetectives.com

Oscar Rosa (2010)

DETECTYS
Nunez De Balboa 114,
Planta 3, Puerta 18
28006 Madrid, Spain
Tel: +34-915591919
Fax: +34-952020148
oscar@detectys.com
http://www.detectys.com

Miguel Sanz-Guijarro (1995)

Proquir Spain, SL
C/ Nunez De Balboa 28
28001 Madrid, Spain
Tel: +34-915776163
Fax: +34-915768839
proquir@proquir.es

MARBELLA

Jose Antonio Arteaga Moreno (2010)

Entrellaves
Calle Carlomagno
11; 3-B
29601 Marbella, Spain
Tel: +34-699021002
Fax: +34-952859081
entrellaves@entrellaves.es
http://www.entrellaves.es

SANTIAGO DE COMPOSTELA

Mario-Paul Ziegler (2005)

Grupo Magnum Hispania
C/ General Pardiñas nº5, 1º-A
15702 Santiago de Compostela
Spain
Tel: +34-981560517
Fax: +34-981519076
galicia@mgminvest.com
http://www.detectivesmagnum.com

VALENCIA

Israel Garcia (2005)
 Detectives Israel
 Ausias March, 17-3 8a
 46240 Carlet (Valencia), Spain
 Tel: +34-658861398
 detectivesisrael@yahoo.es
 http://www.israeldetectives.com

SRI LANKA**COLOMBO**

Felix Perumal (2008)
 International Investigators
 Network Pvt. Ltd.
 No. 20/61, Fairfield Gardens
 08 Colombo, Sri Lanka
 Tel: +94-11-2691531
 Fax: +94-11-2699739
 felix@vigilant-security.com
 http://www.iinsrilanka.com

PANNIPITIYA

Capt M G G Mendis (2010)
 Pansec (Pvt) Ltd.
 15 John Keells Housing Scheme,
 Kalalgoda Road
 10230 Pannipitiya, Sri Lanka
 Tel: +94-38-2232715
 Fax: +94-38-2232845
 ganesh_mendis@yahoo.com

SURINAME**PARAMARIBO**

James Cook (2005)
 Maximum Protective Service, Inc.
 Rio De Janeirostraat #6
 Paramaribo, Suriname
 Tel: +597-442-287
 Fax: +597-434-644
 Mpsint@Aol.Com
 http://www.surinamesecurity.com

SWEDEN**GÖTEBORG**

Niclas Franklin (2013)
 Investigation Services Europe AB
 Box 7242
 Göteborg, SE-402 35, Sweden
 Tel: +46-31-124200
 Fax: +46-31-407710
 niclas@ise.nu
 http://www.ise.nu

GOTHENBURG

Stellan Kjellberg (2010)
 Gothia Protection Group AB
 Box 2003
 SE-438 11Gothenburg Sweden
 Tel: +46-31-225544
 info@gothiaprotection.se
 http://www.gothiaprotection.se

MALMO

Anneli Terese Mattisson (2000)
 Mattisson's Detektivbyrå
 PO Box 3093
 200 22 Malmo, Sweden
 Tel: +46-70-7110150
 info@mattisson.com
 http://www.mattisson.com

NACKA (STOCKHOLM)

Björn Nyström (2008)
 Svenska Internationella Detektivbyrå
 Box 602
 S-131 21 Nacka (Stockholm), Sweden
 Tel: +46-708 650 660 mobile
 svid@telia.com
 http://www.eudetectors.com

STOCKHOLM

Niclas Franklin (2013)
 Investigation Services Europe AB
 Box 24254
 Stockholm, 104 51, Sweden
 Tel: +46-8-21 42 15
 niclas@ise.nu
 http://www.ise.nu

Stellan Kjellberg (2012)

Gothia Protection Group AB
 Box 90303
 120 25 Stockholm Sweden
 Tel: +46-8-410 402 00
 info@gothiaprotection.se
 http://www.gothiaprotection.se

Bo Strandman (1992)

Detecta Information O. Konsult
 PO Box 47111
 100 74 Stockholm, Sweden
 Tel: +46-8-645-1620
 Fax: +46-8-645-1620
 info@detecta.nu
 http://www.detecta.nu

VADDO

Berne Barvefjord (LIFE)
 Investigator Sweden AB
 Osternas 2297
 Vaddo, 760 40 Sweden
 Tel: +46-176-543-60
 Fax: +46-176-545-20
 barvefjord@inbox300.swipnet.se

SWITZERLAND**BERN**

Herbert Gilgen (1991)
 Gilgen Investigations
 Ankerstrasse 26, PO Box 546
 3000 Bern 31, Switzerland
 Tel: +41-31-351-9966
 Fax: +41-31-351-9977
 gilgen.investigations@hispeed.ch

Hans Ruch (1996)

Detectas
 Bernstrasse 33
 3110 Bern (Munsingen)
 Switzerland
 Tel: +41-31-721-1144
 Fax: +41-31-721-1175
 hansruch22@bluewin.ch

ERLENBACH

Jens Riess (2010)
 JR Risk Consulting GmbH
 Seestrasse 101
 CH-8703 Erlenbach,
 Switzerland
 Tel: +41-43-501-2045
 info@jrconsulting.ch
 http://www.jrconsulting.ch

GENEVA

Mario Brero (2000)
 Alp Services SA
 Rue De Montchoisy 36
 1207 Geneva, Switzerland
 Tel: +41-22-707-8722
 Fax: +41-22-786-4860
 geneva@alpservices.com
 http://www.alpservices.com

Christian Sideris (2001)

CS ENQUETES SA Swiss
 Investigation Company Ltd.
 Rue De Lyon 7
 1201 Geneva, Switzerland
 Tel: +41-22-344-0101
 Fax: +41-22-344-2340
 mail@csequetes.ch
 http://www.csequetes.ch

HORGEN

Edgar Zollinger (2007)
 D Fence International Security AG
 PO Box 551
 Horgen CH-8810
 Switzerland
 Tel: +41-44-725-3080
 Fax: +41-44-725-3081
 security@dfence.ch
 http://www.dfence.ch

LUZEIN

Reinhard Feldmaier (2011)
 specially gmbh
 Dalvazza 41
 CH-7242 Luzein
 Switzerland
 Tel: +41-84-466-5544
 Fax: +41-81-740-2941
 service@specialy.ch
 http://www.specialy.ch

MONTHEY

Leonard Bruchez (2010)
 ACI Investigations
 Case postale 389
 1870 Monthey 1, Switzerland
 Tel: +41-24-471-6418
 info@aci-investigations.ch
 http://www.aci-investigations.ch

SAVOSA

Enzo Muehleemann (LIFE)
 UIP
 PO Box 633
 Savosa, 6942 Switzerland
 Tel: +41-91-971-8237
 Fax: +41-91-950-9988

VUFFLENS-LE-CHATEAU

Jaques Tzaut (1982)
 INTER-Investigation & Securite
 Route du Village 18
 Vufflens-le-Chateau
 1134 Switzerland
 Tel: +41-21-802 30 02
 Fax: +41-21-802 35 81
 stbernard75@me.com

ZÜRICH

Fausto Bonvini (LIFE)
 Agentur Bonvini Investigation
 Lavaterstr 81
 Zurich, 8002 Switzerland
 Tel: +41-44-280-2929
 Fax: +41-44-280-2928
 headoffice@abicompanies.com
 http://www.abicompanies.com

Philip Ryffel (2011)

Business Control (Schweiz) AG
 Bahnhofstrasse 71
 8001 Zürich, Switzerland
 Tel: +41-43-444-1144
 Fax: +41-43-444-1184
 phr@bcswitzerland.com
 http://www.bcsitzerland.com

Daniel Senn (1991)

Economy & Criminal Investigations
 Rotachstr. 23
 8003 Zurich, Switzerland
 Tel: +41-44-461-1271
 Fax: +41-44-461-2760
 daniel.senn@ec-investigation.com
 http://www.ec-investigation.com

Peter Stelzer (2011)

Privatdetektei Ryffel AG
 Bahnhofplatz 15
 CH-8023 Zurich, Switzerland
 Tel: +41-44-380-4050
 Fax: +41-44-380-4051
 mail@investigation.ch
 http://www.investigation.ch

TAIWAN

TAIPEI

Adrian Charles (2006)
Joseph Lee & Associates
Level 37, Taipei 101 Tower, Xinyi Road
Section 5, 110 Taipei, Taiwan ROC
Tel: +886-2-8101 0639
Fax: +886-2-8101 0649
security@josephlee.com
http://www.josephlee.com

THAILAND

BANGKOK

Paul Bromberg (1998)
Spectrum OSO Asia Ltd.
Two Pacific Place, Ste. 1202,
142 Sukhumvit Road, 10110 Bangkok, Thailand
Tel: +66-2-626-0250
Fax: +66-2-626-0254
pbromberg@spec-oso.com
http://www.spec-oso.com

Russell "Rusty" Lerner (2006)

Quantic Ltd.
858/159 Sukhumvit 55 Road, Klongtan Nua
Wattana, 10110 Bangkok, Thailand
Tel: +1-713-280-5446
Fax: +66-2-714-9163
rusty@quanticoltd.com
http://www.quanticoltd.com

Michel Mauquoi (2012)

LP Concept Co., Ltd.
252/7 Soi 28/1 Samakorn Village,
Ramkamhang Rd. 112, Sapsansung
Bangkok 10240, Thailand
Tel: +66-2-373-4986
Fax: +66-2-372-2166
michelma@thailand-investigation.com
http://www.thailand-investigation.com

David Milne (2003)

Investigations Asia Company Ltd.
Suite 2j, Tara House, 152-154,
Soi 31, Sukhumvit Rd.
10110 Bangkok, Thailand
Tel: +66-2-662-2419
Fax: +66-2-258-6615
pi@investigationsasia.com
http://www.investigationsasia.com

Sanong Ratanavichai (LIFE)

Bangkok Detective Co. Ltd.
244/175 Mooban Samakorn 2,
Sukapiban 3 - RD - Bankapi
Bangkok, 10250 Thailand
Tel: +66-2-3214103
Fax: +66-2-3182300

TURKEY

BURSA

Cemal Erdogan (2010)
Sir Dedektiflik
Maksem Cad. 84/4 Osmangazi
16050 Bursa, Turkey
Tel: +90-224-220-09-83
Fax: +90-224-220-09-93
c.erdogan@sirdedektiflik.com
http://www.sirdedektiflik.com

ISTANBUL

Ahmet Tumlucali (2009)
Axom International - Turkey
Egitim Mah. 1. Acikgöz Sokak
Ogün Is Merkezi No: 2/9, Hasanpasa - Kadiköy
34722 Istanbul, Turkey
Tel: +90-216-565-38-09
Fax: +90-216-565-38-49
et@axom.eu
http://www.axom.eu

IZMIR

Mesut Ozturk (2012)
Odak Özel Dedektiflik
Cemal Gursel Cd. Koknar
Ap. No. 77/1 Kat.2 D.4
35 Bostanlı Karsiyaka
Izmir, Turkey
Tel: +90-232 484-15-07
Fax: +90-505-764-98-42
info@odakdedektiflik.com
http://www.odakdedektiflik.com

UKRAINE

CRIMEA

Rustam Kamalov (2011)
AVIURCD
14, Lenina Str.
95000 Simferopol
Crimea, Ukraine
Tel: +38-066-2176816
Fax: +38-065-2570700
ovru_arc@mail.ru

DONETSK

Oleksandr Mogilnyi (2010)
Mangust-Donetsk
117/1, Nabereznaya St.
83100 Donetsk, Ukraine
Tel: +38-062-3371380
Fax: +38-062-3817699
mangust-dn@meta.ua
http://www.mangust.at.ua

KIEV

Oleg Gordashevskiy (2011)
Private Enterprise "ASUR"
Bldg. 13a, Kaunasska St.
02160 Kiev, Ukraine
Tel: +38-044-2227817
Fax: +38-044-2227817
asur-detekt@ukr.net
http://www.asur-ua.com

Yuriy Kogut (2004)

Consulting Company "Sidcon"
Pobedy Avenue 121-B
office 224
03115 Kiev, Ukraine
Tel: +38-442-202977
Fax: +38-442-202978
office@sidcon.com.ua
http://www.sidcon.com.ua

Igor Tymofeyev (2005)

The Ukrainian Branch Of DCI
Detectiv Consulting
International GmbH
Kyoto 9/36
02156 Kiev, Ukraine
Tel: +38-096-4321104
Fax: +49-1805-3236651888
detektei@i.com.ua

KYIV

Viktor Dabizhuk (2010)
152 Harkivske Avenue, Apt. #9
02091 Kyiv
Ukraine
Tel: +38-050-4906781 mobile
dabik64@mail.ru

SEVASTOPOL

Alexander Shmagaylo (2013)
Private Detective Ukraine Security
and Detective Agency V.Ch.K.
19, Marshall Gelovany Str.
Sevastopol, 99040
Ukraine
Tel: +38-068-3660562
Fax: +38-069-2671600
crimea.aupd@gmail.com
http://www.private-detective.com.ua

UNITED KINGDOM ENGLAND

AVON

BRISTOL

Dick Smith (2004)
IP Forensics (GB)
10 Windsor Court, Downend
BS16 6DR Bristol, Avon, England
Tel: +44-117-904-7201
Fax: +44-117-904-7202
dick.smith@ipfgb.co.uk
http://www.ipfgb.co.uk

BERKSHIRE

SLOUGH

Steve Cripps (2012)
First Intelligence
PO Box 3872
SL3 3ER Slough, Berkshire, England
Tel: +44-845-230-3403
Fax: +44-175-359-6688
stevec@firstintelligence.co.uk
http://www.firstintelligence.co.uk

R. John Griffiths (2010)

Corporate Surveillance Services (Heathrow)
P.O. Box 1374
Slough, Berkshire SL3 9XH England
Tel: +44-870-446-1654
Fax: +44-1604-521 001
john@corporatesurveillance.co.uk
http://www.corporatesurveillance.co.uk

CAMBRIDGESHIRE

CAMBRIDGE

Vincent Johnson (2013)
Cambridge Detective Agency Ltd.
Sheraton House, Castle Park, Cambridge
Cambridgeshire, CB3 0AX, England
Tel: +44-163-860-4663
vj@cambridgedetectives.com
http://www.cambridgedetectives.com

EAST YORKSHIRE

HULL

Maureen Jacques-Turner (1995)
Paragon Consultants International
10 Temple Close, Welton, Brough, Near Hull
HU15 1NX East Yorkshire, England
Tel: +44-148-266-6610
Fax: +44-871-253-1819
mj-t@wadnet.karoo.co.uk

Richard Jacques-Turner (LIFE)

Paragon Consultants International
10 Temple Close, Welton, Brough, Near Hull
Hull, East Yorkshire, England HU15 1NX
Tel: +44-1482-666610
Fax: +44-871-253-1819
paragon@wadnet.karoo.co.uk

GREATER MANCHESTER

BOLTON

Edward Potter (2013)
D-Tect Investigations Ltd.
The Coach House, Rear of 22,
Chorley New Road
Bolton, Greater Manchester,
BL1 4AP, England
Tel: +44-845-643-2602
Fax: +44-808-280-2296
enquiries@d-tect.net
http://www.d-tect.net

LANCASHIRE

BLACKPOOL

Eric Shelmerdine (1989)
E S Consultancy
295-297 Church St.
FY1 3PJ Blackpool, Lancashire, England
Tel: +44-125-329-7502
Fax: +44-125-375-2185

ORMSKIRK**Robert Smith (2013)**

Kenyon & Co. Ltd.
Goodyear Business Park,
New Street, Mawdesley
Ormskirk, Lancashire
L40 2QP, England
Tel: +44-170-482-1171
Fax: +44-1704 823338
info@kenyons.org.uk
http://www.kenyons.org.uk

LONDON - GREATER LONDON**Nigel Brown (1998)**

BTG Intelligence Ltd.
32 Cornhill
EC3V 3BT London
England
Tel: +44-207-206-0092
n.brown@dangate.co.uk
http://www.btg-intelligence.com

Janice Collie (2013)

Discovery Forensics Ltd.
23, Austin Friars
London, EC2N 2QP, England
Tel: +44-207-117-7946
Fax: +44-207-117-4818
info@discoveryforensics.co.uk
http://www.discoveryforensics.co.uk

Jonathan Fawcett (2011)

Conflict International Ltd.
180 Piccadilly
W1J 9HF London, England
Tel: +44-207-917-2939
jon@conflictinternational.co.uk
http://www.conflictinternational.co.uk

Paul Hawkes (1995)

AAPM Investigations
8 Bulmer Mews
Notting Hill Gate
W11 3NZ London, England
Tel: +44-207-854-9000
Fax: +44-207-854-9090
paulhawkes@investigationsservices.co.uk
http://www.ra77.com

Alexander Herget (2011)

Ingenium Investigations
26 York Street, Mayfair
W1U 6PZ London, England
Tel: +44-752-712-9427
Fax: +44-207-112-8038
a.herget@ingeniuminvestigations.com
http://www.ingeniuminvestigations.com

Keith Hunter (2003)

Risc Management Ltd.
7-8 Conduit Street, 3rd Floor
W1S 2XF London, England
Tel: +44-207-290-6900
Fax: +44-207-290-6901
khunter@managingrisc.com
http://www.managingrisc.com

Tony Imossi (1993)

Solicitors' Law Services
5th Flr., 26-28 Great Portland St.
W1W 8AS London, England
Tel: +44-845-094-0438
Fax: +44-208-082-5373
timossi@investigations.co.uk
http://www.investigations.co.uk

Mike LaCorte (2011)

Conflict International Ltd.
180 Piccadilly
W1J 9HF London, England
Tel: +44-207-917-2939
Fax: +44-203-413-0201
m.lacorte@conflictinternational.com
http://www.conflictinternational.co.uk

Michael Morris (2000)

Morris Chase International Ltd.
50 Jermyn Street
SW1Y 6LX London, England
Tel: +44-870-749-0081
Fax: +44-870-749-0082
mci@morrischase.com
http://www.morrischase.com

Paul Robinson (2013)

Company Documents Ltd.
29 Harley Street
London, W1G 9QR England
Tel: +44-207-383-4477
Fax: +44-207-383-4488
paul@companydocuments.com
http://www.companydocuments.com

Spencer Vold-Burgess (2009)

Eccora Ltd.
31 Southhampton Row
WC1B 5HJ London, England
Tel: +44-207-084-6211
Fax: +44-207-084-6211
svb@eccora.com
http://www.eccora.com

Roy Whitehouse (1996)

W.I.S. International
202 Kensington Church Street, Suite 4
London, England W8 4DP
Tel: +44 (0) 20 3151 1236
Fax: +44 (0) 20 7980 4965
info@wis-int.com
http://www.wis-int.com

Michael Wright (2003)

BTG Global Risk Partners
32 Cornhill, EC3V 3BT London, England
Tel: +44-207-398-3800
Fax: +44-207-398-3799
mike.wright@btg-globalriskpartners.com
http://www.btg-globalriskpartners.com

MANCHESTER - GREATER MANCHESTER**J. Michael Green (2000)**

Amsel & Co.
Trident One, Sytal Road
M22 5XB Manchester, England
Tel: +44-161-435-6044
Fax: +44-161-904-7307
blackbird@amsel.co.uk
http://www.amsel.co.uk

Ian Ross (2011)

Acorn Investigations Ltd.
15 William Aiton House, 4 Whalley Road
M16 8AB Manchester, England
Tel: +44-161-226-2228
Fax: +44-870-443-1097
ian@acorninvestigations.com
http://www.enquiryagentnetwork.co.uk/
acorn-investigations-ltd-1029.html

Darren Shelmerdine (2004)

BTG Intelligence Ltd.
340 Deansgate
M3 4LY Manchester, England
Tel: +44-161-837-1700
Fax: +44-161-837-1701
darren.shelmerdine@btg-intelligence.com
http://www.btg-intelligence.com

MERSEYSIDE BIRKENHEAD**Alan Jacobs (LIFE)**

Jacobs
4 Europa Boulevard, Birkenhead
Merseyside, England CH41 4PE
Tel: +44-151-650-4800
Fax: +44-151-650-4999
alan.jacobs@jacobsbailiffs.co.uk
http://www.jacobsbailiffs.co.uk

Paula Jacobs (1998)

Jacobs
4 Europa Boulevard
CH41 4PE Birkenhead, Merseyside, England
Tel: +44-151-650-4800
Fax: +44-151-650-4999
pj@jacobsbailiffs.co.uk
http://www.jacobsbailiffs.co.uk

Simon Jacobs (1998)

Jacobs
4 Europa Boulevard
CH41 4PE Birkenhead, Merseyside, England
Tel: +44-151-650-4800
Fax: +44-151-650-4999
sj@jacobsbailiffs.co.uk
http://www.jacobsbailiffs.co.uk

MERSEYSIDE LIVERPOOL**Peter Farrington (2010)**

Probe Investigations (UK) Ltd.
The Lodge, Edwards Lane, Hunts Cross
L24 9HW Liverpool, Merseyside, England
Tel: +44-845-520-7777
Fax: +44-845-520-7778
enqs@probeuk.com
http://www.probeuk.com

Kevin Hooker (2010)

Red Flag Alert Trace & Discovery
4th Floor, 1 Old Hall Street
L3 9HF Liverpool, Merseyside, England
Tel: +44-151-237-5930
Fax: +44-151-237-5939
kevin.hooker@redflagalert.com
http://www.redflagalert.com

WIRRAL**Philip Hastain (2010)**

Recovery UK Ltd.
PO Box 130
CH30 9BS Wirral, Merseyside, England
Tel: +44-796-652-7888
Philip.hastain@recovery.uk.com
http://www.recovery.uk.com

MIDDLESEX RUISLIP

Nathan Dony (1995)
Dony Consultants
22 Willow Gardens
HA4 6JT Ruislip, Middx, England
Tel: +44-189-562-5700
Fax: +44-189-562-5300
nathan@donyconsultants.co.uk
http://www.donyconsultants.co.uk

NORTHAMPTONSHIRE NORTHAMPTON**R. John Griffiths (2010)**

Corporate Surveillance Services
PO Box 455
NN4 6XZ Northampton, Northants, England
Tel: +44-870-446-1654
Fax: +44-160-452-1001
john@corporatesurveillance.co.uk
http://www.corporatesurveillance.co.uk

NORTHUMBERLAND BERWICK UPON TWEED**John Moses (2005)**

Longmere Consultants
PO Box 115
TD15 2XA Berwick Upon Tweed, Northd, England
Tel: +44-128-938-2006
Fax: +44-128-938-2123
longmere@btinternet.com
http://www.longmereuk.com

**NOTTINGHAM
WOLLATON****John McNulty (2006)**

Nottingham Investigations
23 Ashchurch Dr.
NG8 2RB Nottingham, Wollaton, England
Tel: +44-115-928-1998
info@nottinghaminvestigations.co.uk
http://www.nottinghaminvestigations.co.uk

**NOTTINGHAMSHIRE
NOTTINGHAM****Francis Hull (2005)**

Frank Hull Associates
34 Kelham Drive
NG5 1RB Nottingham, Notts, England
Tel: +44-115-960-4262
Fax: +44-115-960-2362
frank.hull@btinternet.com
http://www.frankhull.com

**OXFORDSHIRE
OXFORD****Stuart Bridges (2008)**

Varsity Publications
PO Box 222, Chipping Norton
OX7 5UW Oxford, England
Tel: +44-160-864-2831
Fax: +44-160-864-2851
varsity@varsitypublications.com
http://www.varsitypublications.com

**SHROPSHIRE
SHREWSBURY****Charles Morris (2011)**

Aspect Executive
Kennedy House, 2 Kennedy Road
SY3 8SA Shrewsbury, Shropshire, England
Tel: +44-174-324-0344
Fax: +44-174-324-0344
cmorris6@toucansurf.com

**SURREY
SURBITON****Ian Beim (2011)**

I. J. Beim & Associates
45D Victoria Road
KT6 4JL Surbiton, Surrey, England
Tel: +44-208-390-1942
Fax: +44-208-390-9054
info@ianbeim.co.uk
http://www.ianbeim.co.uk

**SUSSEX - WEST
WORTHING****Richard Howatson (2009)**

Spain Process Services & Enquiry Agents
26 The Drive, BN11-5LL Worthing
W Sussex, England
Tel: +34-968-170316
Fax: +34-968-170316
admin@sps1.eu
http://www.sps1.eu

**WEST MIDLANDS
BIRMINGHAM****John Hope (1984)**

Mercia Detective Agency
PO Box 13925, Birmingham
W Mids, England B42 9DN
Tel: +44-121-356-0308
Fax: +44-121-356-1782
privatejohnhope@aol.com
http://www.pijh.co.uk

John Preece (1985)

Protectall Investigations
445 Stratford Rd.
Birmingham, W Mids, England B11 4LB
Tel: +44-121-773-8474
Fax: +44-121-773-8401
jp@protectallsecurity.wanadoo.co.uk
http://www.protectallsecuritygroupplc.com

**WEST SUSSEX
CRAWLEY DOWN****Donald Gibson (2001)**

Link Investigations
Rosemount, Sunny Avenue
RH10 4JL Crawley Down, W Sussex, England
Tel: +44-134-271-9361
info@linkinvestigations.co.uk
http://www.linkinvestigations.co.uk

**WEST YORKSHIRE
LEEDS****Mark Hodgson (2013)**

Tremark Associates Ltd.
Joshua Chambers, 332 York Road
Leeds, West Yorkshire, LS9 9DN, England
Tel: +44-113-263-6466
mark.hodgson@tremark.co.uk
http://www.tremark.co.uk

**WORCESTERSHIRE
BROMSGROVE****Alan Blaney (2011)**

Focus (UK) Ltd.
Basepoint Business Centre
Bromsgrove Technology Park
Bromsgrove B60 3ET England
Tel: +44-879-919-4745
Fax: +44-870-919-4743
alan.blaney@focustraining.co.uk
http://www.focustraining.co.uk

SCOTLAND-UK**GLASGOW****John McConnachie (2009)**

J & S Associates, LLP
PO Box 26300, G76 0YE Glasgow, Scotland
Tel: +44-135-530-3828
Fax: +44-135-530-3833
john@jandsassociates.com
http://www.jandsassociates.com

Tom Connell (2001)

TCIS
Trump House
15 Edison Street, G52 4JW Glasgow, Scotland
Tel: +44-141-882-8888
Fax: +44-141-882-8828
info@tomconnell.com
http://www.tomconnell.com

Alf Goldberg (1988)

Fox Investigations Ltd.
Fox House, 1 Glasgow Rd., Kirkintilloch,
Glasgow, G66 1AG Scotland
Tel: +44-141-776-0072
Fax: +44-141-776-4769
alf@foxdetectives.co.uk
http://www.foxdetectives.co.uk

Ian Kerr (1997)

I.D. Inquiries Ltd.
3rd Floor, 29 Eagle St.,
Craighall Business Park
G4 9XA Glasgow, Scotland
Tel: +44-141-333-9656
Fax: +44-141-333-9643
info@idinquiries.com
http://www.idinquiries.com

UNITED ARAB EMIRATES**DUBAI****Zafar Anjum (2010)**

Corporate Research and Investigations LLC
904, Liberty House, DIFC, Sheikh Zayed Road
111794 Dubai, United Arab Emirates
Tel: +971-4-3589884
Fax: +971-4-3589094
admin@crigroup.com
http://www.crigroup.com

**UNITED STATES
OF AMERICA****ALABAMA****MOBILE****Thomas Brabston (1990)**

Brabston Legal Investigations, Inc.
126 Batre Lane
Mobile, AL 36608
Tel: +1-251-666-5666
Fax: +1-251-661-8807
alpi@survsol.com

ALASKA**HOMER****Andy Klamser (2005)**

Alaska Investigations
PO Box 4394
Homer, AK 99603
Tel: +1-907-299-1989
Fax: +1-907-235-6863
klamser@acsalaska.net
http://www.alaskainvestigations.com

ARIZONA**BULLHEAD CITY****Bodo Cook (2003)**

BODO, P.I.
1660 Lakeside Dr., #402
Bullhead City, AZ 86442
Tel: +1-877-381-7009
Fax: +1-877-381-7009
bodo@bodopi.com
http://www.bodopi.com

MESA**Daniel Jones (1978)**

FCI Group
5235 E. Southern Ave.,
Suite 106-183
Mesa, AZ 85206
Tel: +800-228-5112
Fax: +1-213-438-9999
dan@dyjones.com

Jeffrey Kimble (2011)

Arizona Private Investigations
101 West Main Street
Mesa, AZ 85201
Tel: +1-480-318-9936
Fax: +1-480-307-9410
jeff@arizonalegaldocs.com
http://www.azprivateeye.com

ORO VALLEY**Frederick Coward (2002)**

Investigative Services International
(ISI) Corporation
1224 E. Camino Diestro
Oro Valley, AZ 85704
Tel: +1-808-781-8182
Fax: +1-253-981-8581
f.coward@isi-corp.com
http://www.isi-corp.com

PHOENIX**George Eleftheriou (2006)**

G.E. Investigations, LLC
3507 North Central Ave., Ste. #400
Phoenix, AZ 85012
Tel: +1-866-347-7948
Fax: +1-602-281-6705
TheSquad@GelInvestigations.com
http://www.GelInvestigations.com

Michele Palmer (2005)

Cachet International, Inc.
2415 E. Camelback Rd., Ste. 700
Phoenix, AZ 85016
Tel: +1-602-912-5730
Fax: +1-602-926-8020
cachet_int@usa.net
http://www.cachet-inter.com

Bette Webb (LIFE)

Capitol Detective Agency Inc.
2922 N.18th Place, Phoenix, AZ 85016-7705
Tel: +1-602-264-9771
Fax: +1-602-264-9814
prosnooper@aol.com
http://www.capitoldetective.com

Larry Webb (LIFE)

Capitol Detective Agency Inc.
2922 N.18th Place, Phoenix, AZ 85016-7705
Tel: +1-602-264-9771
Fax: +1-602-264-9814
pnxcap@aol.com
http://www.capitoldetective.com

PRESCOTT**Robert Palmer (1982)**

Palmer Investigative Services
PO Box 10760, Prescott, AZ 86304
Tel: +1-928-778-2951
Fax: +1-928-445-7204
magnum@cablone.net
http://www.mitigationexpert.com

Cliff Petrovsky (1996)

Investigative Network, Inc.
424 E. Gurley St., Prescott, AZ 86301
Tel: +1-928-717-2525
Fax: +1-800-755-1878
network@assetsearch.com
http://www.assetsearch.com

SCOTTSDALE**Michael Rabern (1985)**

International Counterintelligence Services, Inc.
8283 N. Hayden Rd., Ste. 128
Scottsdale, AZ 85258
Tel: +1-480-990-8888
Fax: +1-480-675-8800
michael.rabern@icsworld.com
http://www.icsworld.com

W. David Rabern (LIFE)

International Counterintelligence Services, Inc.
8283 N. Hayden Road, Ste 128
Scottsdale, AZ 85258
Tel: +1-480-990-8888
Fax: +1-480-675-8800
Dr@icsworld.com

TUCSON**Bertram Falbaum (LIFE)**

Investigative Dynamics Inc.
6696 N. Cocopas Rd.
Tucson, AZ 85718-2546
Tel: +1-520-577-2418
Fax: +1-520-529-3837
BERTFALBAUM@COMCAST.NET
http://www.invdynamics.com

Anthony Zinkus (LIFE)

Anthony Agency Inc, Investigators
PO Box 40668, Tucson, AZ 85717
Tel: +1-520-795-0606
Fax: +1-520-624-7503
http://www.anthonydetective.com

ARKANSAS**LITTLE ROCK****Fred Myers (LIFE)**

Fred Myers Consulting Inc.
PO Box 3196, Little Rock, AR 72203
Tel: +1-501-376-6266
Fax: +1-501-376-7925
meyersas@windstream.net

CALIFORNIA**AGOURA HILLS****Stephen Shalov (2001)**

Stephen L. Shalov Investigations
5602 Middle Crest Dr., Agoura Hills, CA 91301
Tel: +1-818-889-9768
ssshalov@yahoo.com

BERKELEY**David Sullivan (1995)**

Sullivan Associates International, LLC
2721 Shattuck Ave.
Berkeley, CA 94705
Tel: +1-510-704-8770
Fax: +1-510-704-8770
David@sullivanpi.com
http://www.sullivanpi.com

BEVERLY HILLS**Stephen Polak (2007)**

Sunset Blvd. Investigations, Inc.
9663 Santa Monica Blvd., #258
Beverly Hills, CA 90210
Tel: +1-800-482-4815
Fax: +1-714-969-1322
swpinv@aol.com

Reinhardt Schuerger (2006)

R.J. Schuerger & Associates
311 N. Robertson Blvd., Unit 286
Beverly Hills, CA 90211
Tel: +1-310-447-4271
Fax: +1-661-298-2017
schuergerr@gmail.com
http://www.rjsa.net

Basil "Steve" Stephens (2009)

Close Range International
311 N. Robertson Blvd., # 523
Beverly Hills, CA 90211
Tel: +1-323-343-0177
Fax: +1-888-461-1893
steve@closerangepi.com
http://www.closerangeinternational.com

BOLINAS**Josiah Thompson (LIFE)**

Josiah Thompson Investigations
PO Box 247
Bolinias, CA 94924
Tel: +1-415-868-9022
gum226@sbcglobal.net

BRENTWOOD**Leon Beckford (1998)**

Beckford Investigation &
Consultant Bureau
842 Vernazze Ct.
Brentwood, CA 94513
Tel: +1-925-516-9111
Fax: +1-925-516-9308
ispy@beckfordinvestigations.com
http://www.beckfordinvestigations.com

BURLINGAME**Melvin Tobias (LIFE)**

Research Specialists Inc.
25 Edwards Ct., Ste. 101
Burlingame, CA 94010
Tel: +1-650-342-9530
Fax: +1-650-342-9534
info@rsi-reports.com
http://www.rsi-reports.com

BURLINGAME (SAN FRANCISCO)**Joel Michel (LIFE)**

Gladding & Michel
840 Hinckley Road
Suite 144
Burlingame, CA 94010
Tel: +1-650-692-1140
Fax: +1-650-692-1150
jmichel@gladding-michel.com
http://www.gladding-michel.com

BURLINGAME (SAN FRANCISCO)**Christopher Webster (1992)**

Christopher Webster Investigation
PO Box 1712
Burlingame, CA 94011
Tel: +1-650-342-9495
cwebster@cwipi.com

CLAREMONT**Carter Spohn (2012)**

Millennium Intelligence Agency
310 North Indian Hill Blvd., #110
Claremont, CA 91711-4611
Tel: +1-909-626-1455
pvteye@earthlink.net
http://www.miausa.com

COLUSA**Joseph Berger (LIFE)**

Berger & Berger Inc.
PO Box 547/121, Country Club Dr.
Colusa, CA 95932
Tel: +1-530-458-2873
Fax: +1-530-458-7783
jgberger@bbi-inc.com
http://www.bbi-inc.com

CONCORD**Brandon August (2011)**

Investigative Consultants International, Inc.
3135 Clayton Rd., Ste. 208
Concord, CA 94519
Tel: +1-800-799-7705
Fax: +1-925-798-7691
icci@pri-eye.com or
brandon@pri-eye.com
http://www.pri-eye.com

COSTA MESA**James Gonzalez (2007)**

Bear Witness
PO Box 11092
Costa Mesa, CA 92627
Tel: +1-714-557-2327
Fax: +1-714-557-2324
surveil4u@aol.com
http://www.proof247.com

DANVILLE**Michael Frame (2005)**

The Frame Group, Inc.
696 San Ramon Valley Blvd., Ste. 125
Danville, CA 94526-4022
Tel: +1-925-837-8309
Fax: +1-925-837-8737
michael@theframegroup.com

EL DORADO HILLS**Derek Vanacore (2005)**

Vanacore International
4359 Town Center Blvd., Ste. 217
El Dorado Hills, CA 95762
Tel: +1-916-932-0055
Fax: +1-866-906-4036
derek@vanacoreintl.com
http://www.vanacoreintl.com

FOOTHILL RANCH**Vance Lommen (2004)**

VARANGIANS LLC
26741 Portola Pkwy., Ste. 1E 450
Foothill Ranch, CA 92610
Tel: +1-949-709-2375
Vance@varangians.org
http://www.varangians.org

FULLERTON**Jeffrey Stearman (2004)**

Stearman Investigative Services
2601 E. Chapman Ave., Ste. 114
Fullerton, CA 92831
Tel: +1-714-871-7778
Fax: +1-714-871-7806
privatedetective1@sbcglobal.net

GLENDALE

Sue Sarkis (1983)
Sarkis Detective Agency
1346 Ethel Street
Glendale, CA 91207
Tel: +1-818-242-2505
suesarkis@aol.com

GLENDORA**Eddy McClain (LIFE)**

Krout & Schneider Inc.
2250 Lindsay Way
Glendora, CA 91740
Tel: +1-909-599-9500
Fax: +1-909-599-8060
mclclained@aol.com

GOLD RIVER**Raymond Smothers (LIFE)**

11436 Sarah Royce Court
Gold River, CA 95670
Tel: +1-916-631-8499
smother@softcom.net

GRANADA HILLS**Tawni Tyndall (2004)**

On The Q.T. Investigations
11862 Balboa Blvd., PMB 401
Granada Hills, CA 91344
Tel: +1-818-414-2059
Fax: +1-818-475-5461
tawni.tyndall@on-the-qt.com
http://www.ontheqt.net

GRANITE BAY**Lise Baker (1996)**

L.S. Baker Investigations
PO Box 2298, Granite Bay, CA 95746
Tel: +1-916-652-9456
Fax: +1-916-652-9456
bakerpi@jps.net

HAYWARD**Clark Beermann (1987)**

AOC Investigations
2493 Technology Drive, Hayward, CA 94545
Tel: +1-510-782-6841
Fax: +1-510-782-9004
piman5@aol.com

HUNTINGTON BEACH**Allen Cardoza (1983)**

West Shield Investigations
16033 Bolsa Chica 104-350
Huntington Beach, CA 92649
Tel: +1-877-899-8585
Fax: +1-866-874-9588
westshield@att.net
http://www.westshield.com

Logan Clarke (1986)

Clarke International Investigations
5942 Edinger Ave., #113-127
Huntington Beach, CA 92649
Tel: +1-951-316-1744
Fax: +1-213-625-0407
logan@loganclarke.com
http://www.loganclarke.com

Robert Kirschner (2004)

Threat Management and Protection, Inc.
PO Box 5640,
Huntington Beach, CA 92615-5640
Tel: +1-888-926-8110
Fax: +1-714-352-7198
rjk@tmapnet.net
http://www.threatprotect.com

Harry Thielen (1990)

Thielen Investigations Inc.
16458 Bolsa Chica St., Ste. 203
Huntington Beach, CA 92649-2603
Tel: +1-714-840-5128
Fax: +1-714-840-7674
harry@harrypi.com

IRVINE**Bruce Haskett (1979)**

Bruce A. Haskett & Assoc. Inv.
PO Box 53763, Irvine, CA 92619
Tel: +1-714-328-4399
brucehaskett@cox.net

LA CRESCENTA**Christian Filipiak (1996)**

Performance Investigations, Inc.
2951 Honolulu Ave., Ste. H
La Crescenta, CA 91214
Tel: +1-818-248-7673
Fax: +1-818-248-3099
pfinvestigations@aol.com

Vicki Siedow (2012)

Siedow & Associates Investigations
2629 Foothill Blvd., #262
La Crescenta, CA 91214
Tel: +1-818-242-0130
Fax: +1-818-688-3295
vicki@vickipi.com
http://www.vickipi.com

LA MIRADA**John Lautzenhiser (1982)**

PO Box 1002, La Mirada, CA 90637
Tel: +1-310-699-6455

LA QUINTA**Joel Michel (1978)**

Gladding & Michel
50175 El Dorado Dr.
La Quinta, CA 92253
Tel: +1-760-564-5502
Fax: +1-760-564-4181
jmichel@Gladding-Michel.com
http://www.gladding-michel.com

Philip Stuto (1984)

Around The Globe Investigations, Inc.
51-397 Marbella Court, La Quinta, CA 92253
Tel: +1-760-564-2224
Fax: +1-760-777-1855
pjstuto@yahoo.com
http://www.atgi.biz

LAFAYETTE**J. Michael Di Pretoro (2004)**

Di Pretoro International LLC
637 Glorietta Blvd.
Lafayette, CA 94549
Tel: +1-925-788-7092
Fax: +1-925-962-0517
michaeldipretoro@yahoo.com

LONG BEACH**John Talaganis (1990)**

J.H.R.I., Inc.
PO Box 3569, Long Beach, CA 90803
Tel: +1-562-446-2840
Fax: +1-562-856-1277
jhri@ix.netcom.com
http://www.jhripi.com

Walter Zwonitzer (LIFE)

Zwonitzer Group Investigations
PO Box 4071, Long Beach, CA 90804
Tel: +1-714-236-0373
Fax: +1-714-236-0373
wzwonitzer@aol.com

LOS ANGELES**Allen Cardoza (1983)**

West Shield Investigations
2265 Westwood Blvd, Ste. 322
Los Angeles, CA 90064
Tel: +1-877-899-8585
Fax: +1-866-874-9588
Westshield@Att.net
http://www.westshield.com

Ronit (Renee) Edry (2004)

Westside Detectives, Inc.
6230 Wilshire Blvd., #59
Los Angeles, CA 90048
Tel: +1-323-936-2660
Fax: +1-310-842-9684
westsideusa@yahoo.com
http://www.westsideinvestigations.com

LOS GATOS**Cody Salfen (2012)**

Cody S Investigations
PO Box 33216
Los Gatos, CA 95031
Tel: +1-408-313-0109
cody@codysinvestigations.com
http://www.codysinvestigations.com

MALIBU**Armand Grant (LIFE)**

Teltec Investigations, Inc.
28955 Pacific Coast Hwy.
Malibu, CA 90265
Tel: +1-310-457-5051
Fax: +1-310-457-6307

MARTINEZ**Buddy Jones (2012)**

Holiday Investigative Services, Inc.
1155C Arnold Dr., #263
Martinez, CA 94553
Tel: +1-925-370-6090
Fax: +1-877-561-2462
Buddy@Holidayinvestigations.com
http://www.holidayinvestigations.com

MENLO PARK**Nathan Moser (2012)**

Moser & Associates
1259 El Camino Real #102
Menlo Park, CA 94025
Tel: +1-650-714-5949
natemoserpi@gmail.com
http://www.moserandassociates.com

MONROVIA**Ernest Koerberlein (2012)**

IncidentResponse.US
710 S. Myrtle Ave., #300
Monrovia, CA 91016
Tel: +1-888-330-5550
Fax: +1-888-339-4582
ernie@incidentresponse.us
http://www.incidentresponse.us

MORAGA**Norman Sokalski (1999)**

Norm Sokalski Investigations
145 Via Joaquin
Moraga, CA 94556
Tel: +1-510-703-7721
nsokalski@aol.com

MURRIETA**Michael Julian (2004)**

National Business Investigations, Inc.
24910 Las Brisas Rd., Ste. 105
Murrieta, CA 92562
Tel: +1-951-677-3500 x26
Fax: +1-951-677-5772
mjulian@investigations-nbi.com
http://www.investigations-nbi.com

NEWPORT BEACH**Allen Cardoza (1983)**

West Shield Investigations
3857 Birch Street suite 208
Newport Beach
CA 92660-2616
Tel: +1-877-899-8585
Fax: +1-866-874-9588
Westshield@Att.Net
http://www.westshield.com

Gregory Reese (2012)

Clear Image Investigations, Inc.
2549 Eastbluff Dr., #130
Newport Beach
CA 92660
Tel: +1-949-335-1716
Fax: +1-949-423-0136
greg@clearimageinvestigations.com
http://www.clearimageinvestigations.com

NORTH HOLLYWOOD**Zeev Haskal (2001)**

Mega Group Private Investigations, Inc.
4605 Lankershim Blvd., Ste. 721
North Hollywood
CA 91602
Tel: +1-323-665-4600
Fax: +1-323-665-3939
zeev@megagroupinvestigations.com
http://www.megagroupinvestigations.com

Marlene Ponder (1981)

Ponder Detective Agency
6252 Goodland Place
North Hollywood, CA 91606
Tel: +1-818-769-0151
Fax: +1-818-509-9662
mponderpda@aol.com

NOVATO**J.D. Hicks (2006)**

J.D. Hicks & Associates
Detective Agency
PO Box 5035,
Novato, CA 94948
Tel: +1-415-435-3626
Fax: +1-415-435-3716
jdicksdetective@aol.com

OAKLAND**E. R. Balinton (2013)**

Eye Complete Investigations
484 Lake Park Ave., #57
Oakland, CA 94610
Tel: +1-415-804-2675
cmginc49@aol.com

Francie Koehler (2007)

Special Circumstances
510 3rd St., Ste. 101-D
Oakland, CA 94607
Tel: +1-877-227-7492
Fax: +1-510-275-0355
franciek@pacbell.net
http://www.specialcircumstancespi.com

PALM SPRINGS**Troy Castillo (2012)**

Paloma Investigative Services
255 N. El Cielo Road, #467
Palm Springs, CA 92262
palomapi@aol.com

RANCHO CORDOVA**Jesse Robles (2010)**

Apex Investigation
11171 Sun Center Dr., Ste. 120
Rancho Cordova
CA 95670
Tel: +1-916-768-2739
Fax: +1-888-900-2739
jr@apexpi.com
http://www.apexpi.com

Nick Savala (2004)

Employment Check, Inc.
7349 Milliken Ave., #140-203
Rancho Cucamonga
CA 91730
Tel: +1-909-987-5115
Fax: +1-909-987-0115
nicks@employment-check.com
http://www.employment-check.com

RANCHO STA MARGARITA**Thomas Lawson (1992)**

Apscreen, Inc.
PO Box 80639
Rancho Santa Margarita
CA 92688
Tel: +1-800-277-2733
Fax: +1-888-277-2733
tomlawson@apscreen.com
http://www.apscreen.com

SALINAS**Josafath Rodriguez (2012)**

Rodriguez & Associates Investigations
4 Rossi Circle, Ste. 217
Salinas, CA 93907
Tel: +1-831-975-4602
Fax: +1-866-770-8752
spec.investigations@gmail.com
http://www.investigationsind.com

SAN DIEGO**Kyle Dau (2012)**

Kyle Dau Investigation
1412 Opal St.
San Diego, CA 92109
Tel: +1-858-488-8131
Fax: +1-858-488-8131
kyle@khdau.com
http://www.khdau.com

Benjamin Harroll (LIFE)

P.I. Museum
Gaslamp Quarter Investigations
923 Island Avenue
San Diego, CA 92101
Tel: +1-619-239-6991
Fax: +1-619-239-6992
benharroll@cox.net
http://www.pimuseum.com

Peter Mazzone (2008)

Peter Lewis Mazzone
International Investigations
1666 Garnet Ave., PMB 402
San Diego, CA 92109-3116
Tel: +1-619-544-4165
Fax: +1-619-283-1229
mazzone_investigations@juno.com
http://www.mazzonedetectiveagency.com

George Newman (2010)

Tactical Investigative Services
1034 25th Street, #300
San Diego, CA 92102
Tel: +1-619-231-0933
Fax: +1-619-231-0569
tacticalgmn@sbcglobal.net
http://www.tacticalinvestigative.com

Thomas Telles (2007)

Telles Global Consultants, Inc.
11956 Bernardo Plaza Dr., Ste. 537
San Diego, CA 92128
Tel: +1-619-793-5521
Fax: +1-480-393-5571
ttelles@tellesglobalconsultants.com
http://www.tellesglobalconsultants.com

Darryl Thibault (1994)

Pexis Investigations &
Security/DBA Pexis Corporation
3659 India St., Ste. 201
San Diego, CA 92103
Tel: +1-619-297-9959
Fax: +1-619-297-9062
drt1083@aol.com
http://www.pexis.com

SAN FRANCISCO**Samuel Brown (1989)**

Sam Brown Investigations
PO Box 31212
San Francisco, CA 94131
Tel: +1-415-621-5918
Fax: +1-415-621-7627
sbgroup@att.net
http://www.sambrowngroup.com

David Fechheimer (LIFE)

Private Investigations
2005 Lyon Street
San Francisco, CA 94115
Tel: +1-415-885-5918
Fax: +1-415-885-0685

Scott Filley (2008)

Filley & Associates
5758 Geary Blvd., Ste. 348
San Francisco, CA 94121
Tel: +1-415-462-1631
Fax: +1-415-462-9722
investigation@filley.com
http://www.filley.com

Scott Filley (2008)

Filley & Associates
1537 Fourth Street, #136
San Rafael, CA 94901
Tel: +1-415-462-0688
Fax: +1-415-462-9722
investigation@filley.com
http://www.filley.com

Leonard Hobbs (2011)

Neilson & MacRitchie Investigators
PO Box 410187
San Francisco, CA 94141
Tel: +1-415-585-0303
Fax: +1-415-585-0388
lhobbs@neilsonmacritchie.com

Kimberly King (1991)

King Security Services Inc.
1458 Howard St.
San Francisco, CA 94103
Tel: +1-415-556-5464
Fax: +1-415-522-0282
kking@kingsecurity.net
http://www.kingsecurity.com

Alex Kline (1994)

Alex Kline Investigation & Research Service
PO Box 170526
San Francisco, CA 94117-0526
Tel: +1-415-544-0300
Fax: +1-415-358-5740
alex@sfgumshoe.com
http://www.sfgumshoe.com

Paul Lozada (2013)

Anonymous Intelligence Resource Inc.
PO BOX 882791
San Francisco, CA 94188
Tel: +1-800-566-4751
Fax: +1-800-566-4751
pi25358@gmail.com
http://www.anonymousintelligence.com

Shannon Lozada (2013)

Anonymous Intelligence Resource Inc.
PO BOX 882791
San Francisco, CA 94188
Tel: +1-800-566-4751
Fax: +1-800-566-4751
pi26921@gmail.com
http://www.anonymousintelligence.com

Pierre Merkl (2011)

Pierre P. Merkl III Private Investigations
1698 Armstrong Ave.
San Francisco, CA 94124
Tel: +1-415-225-7263
pierremerkl@hotmail.com

Jack Palladino (2000)

Palladino & Sutherland, Inc.
1484 Page St.
San Francisco, CA 94117
Tel: +1-415-863-8008
Fax: +1-415-431-2138
office@psops.com

Nichols Smith (2001)

Parrent Smith Investigation
548 Market St., #88333
San Francisco, CA 94104
Tel: +1-800-516-2448
Fax: +1-707-504-6047
nicsmith@psinvestigates.com
http://www.psinvestigates.com

Tad Whitaker (2012)

Whitaker & Co.
1388 Haight St., #143
San Francisco, CA 94117
Tel: +1-415-602-8468
Fax: +1-415-626-8347
tad@whitakerresearch.com

SAN JOSE**Peter Haber (LIFE)**

Haber Investigations
1702-L Meridian Avenue
Ste. 333
San Jose, CA 95125
Tel: +1-408-978-2325
Fax: +1-408-266-1119
haberp@earthlink.net
http://www.haberinvestigations.org

Johnathan Tal (1987)

Tal-Global Corporation
One Almaden Blvd.,
Ste. 750
San Jose, CA 95113
Tel: +1-408-993-1300
Fax: +1-408-271-9400
jtal@talglobal.net
http://www.talglobal.com

Charles Wall (2008)

Creative Security Company Inc.
150 S. Autumn St., Ste. B
San Jose, CA 95110
Tel: +1-408-295-2600
Fax: +1-408-295-1400
cwall@creativesecurity.com
http://www.creativesecurity.com

SAN JUAN CAPISTRANO**Jim Zimmer (2010)**

Benchmark Investigations
32158 Camino Capistrano #A-415
San Juan Capistrano
CA 92675
Tel: +1-949 248 7721
Fax: +1-949 248 0208
zimmerpi@pacbell.net
http://www.benchmarkinvestigations.com

SAN PEDRO**Jack Torrance (LIFE)**

Baskerville Assn Detectives Intl.
470 West 12TH Street
San Pedro, CA 90731
Tel: +1-310-548-7902
Fax: +1-310-548-7902

SAN RAFAEL**Seth Derish (1986)**

Costa Rica Investigations, SA
1537 Fourth St.,
Ste. 234, San Rafael
CA 94901
Tel: +1-415-648-7007 Toll free from U.S.
Fax: +1-506-2269-8659
seth@privateeyes.com
http://www.privateeyes.com

Pamela Pierce (1995)

Pierce Investigations
PO Box 150710
San Rafael, CA 94915-0710
Tel: +1-415-566-6190
Fax: +1-415-566-2087

SANTA BARBARA**Carmen Naimish (2005)**

INCASE
PO Box 122
Santa Barbara
CA 93102
Tel: +1-805-745-1520
pi@incaseconfidential.com
http://www.incaseconfidential.com

SANTA CLARA**Roberto Rivera (2012)**

Rivera & Associates
2118 Walsh Ave., Ste. 100
Santa Clara, CA 95050
Tel: +1-408-845-0068
Fax: +1-408-716-2424
roberto@riveraassociates.net
http://www.riveraassociates.net

Candice Tal (1995)

Infortal Worldwide
3080 Olcott St., Ste. B240
Santa Clara, CA 95054
Tel: +1-408-298-9700
Fax: +1-408-298-9701
ctal@infortal.com
http://www.infortal.com

SANTA CRUZ**Lisa Wallace (2012)**

Wallace Research & Investigations
205 Braemoor Dr.
Santa Cruz, CA 95060
Tel: +1-831-703-4469
Fax: +1-831-703-4469
lisa@wallace-research.com
http://www.wallace-research.com

SANTA ROSA**Mark Adams (2010)**

White Star Group, Inc.
1275 4th St., Ste. 723
Santa Rosa, CA 95404
Tel: +1-866-566-0108
Fax: +1-888-815-0244
mark@whitestargroup.net
http://www.whitestargroup.net

Chris Reynolds (2012)

Chris Reynolds Investigations
2360 Mendocino Ave., Ste. A2-133
Santa Rosa, CA 95403
Tel: +1-707-579-1120
Fax: +1-866-240-1210
chris@cdrpi.com
http://www.cdrpi.com

SARATOGA**Keith Barna (1999)**

Barna Private Investigations & Security
12333 Saratoga-Sunnyvale Rd.
Saratoga, CA 95070
Tel: +1-408-446-9500
Fax: +1-408-446-9502
kbarna@worldnet.att.net

TEHACHAPI**Susie Wright (2009)**

Wrights Typing Service
29980 Skyline Dr.
Tehachapi, CA 93561-8566
Tel: +1-661-821-1656
susiewright@detectivehelp.com
http://www.susiewright.com

VAN NUYS**J. Corey Friedman (2006)**

Nick Harris Detectives
& Detective Academy
5900 Sepulveda Blvd., Ste. 301
Van Nuys, CA 91411-2572
Tel: +1-800-245-9007
Fax: +1-818-994-7427
nationaldetectives@yahoo.com
http://www.nickharrisdetectives.com/

Josef Lazarovitz (2011)

J L Special Investigations
14401 Sylvan Street, Ste. 212
Van Nuys, CA 91401
Tel: +1-818-781-5500
Fax: +1-818-781-5581
jlsi@pacbell.net

WOODLAND HILLS**Harry Kazakian (2010)**

USA Express Legal Investigative
Services, Inc.
20300 Ventura Blvd., Ste. 290
Woodland Hills, CA 91364
Tel: +1-877-872-3977
Fax: +1-800-861-5311
harry@usaexpressinc.com
http://www.usaexpressinc.com

COLORADO**BRECKENRIDGE****Charles McCormick (1990)**

McCormick Detective Agency
PO Box 444
Breckenridge, CO 80424
Tel: +1-970-453-6378
Fax: +1-970-453-6852
mda444brek@aol.com

CASTLE ROCK**Charles Evans (2009)**

Charles T. Evans Investigations
4833 Front St., Unit B-142
Castle Rock, CO 80104-7901
Tel: +1-303-663-2140
cteinvestigations@myawai.com

Andrea Orozco (2012)

Advanced Professional Investigations
PO Box 654
Castle Rock, CO 80104
Tel: +1-303-947-9796
Fax: +1-303-957-2388
api77@comcast.net
http://www.apisurveillancespecialists.com

A. Dale Wunderlich (LIFE)

A. Dale Wunderlich & Associates Inc.
6484 Lemon Gulch Dr.
Castle Rock, CO 80134
Tel: +1-720-851-8771
Fax: +1-720-851-8763
adwunderlichinc@aol.com
http://www.adwinc.com

DENVER**Robert Heales (1983)**

R.A. Heales & Associates
2075 So. University Blvd, Suite D-190
Denver, CO 80210
Tel: +1-303-996-0355
Fax: +1-303-996-0356
bob.raheales@mindspring.com
http://www.investigateTheWorld.net

FT. COLLINS**Dean Beers (2010)**

Associates in Forensic Investigations, LLC
PO Box 1238
Fort Collins, CO 80522-1238
Tel: +1-970-480-7793 x1
Fax: +1-970-480-7794
beersda@forensic-investigators.com
http://www.forensic-investigators.com

GREENWOOD VILLAGE**Eugene Ferraro (2007)**

Convercent, Inc.
5995 Greenwood Plaza Blvd., Ste. 110
Greenwood Village, CO 80111
Tel: +1-303-526-7600
Fax: +1-303-526-7757
Eugene.Ferraro@Convercent.com
http://www.convercent.com

LITTLETON**Joe Dickerson (1996)**

Financial Forensic Services, LLC
PO Box 270807
Littleton, CO 80127
Tel: +1-303-974-5610
joe@financialforensicservices.com

Stephanie Archer-Dickerson (2001)

7413 S. Parfet Ct.
Littleton, CO 80127
Tel: +1-303-875-4167
archerdickerson@gmail.com

**CONNECTICUT
NEWINGTON****Cortney Kiernan (2010)**

Check Fund Manager LLC
365 Willard Ave., Ste. 2C
Newington, CT 06111
Tel: +1-919-251-8503
Fax:
cortneywad@gmail.com
http://www.checkfundmanager.com

Guy Simonian (2005)

Check Fund Manager LLC
365 Willard Ave., Ste. 2C
Spectrum Office & Technology Park
Newington, CT 06111-2316
Tel: +1-860-666-9595
wad@checkfundmanager.com
http://www.checkfundmanager.com

SHELTON**Mark MacDaniel (2013)**

Connecticut Investigative Services
4 Research Dr., Ste. 402
Shelton, CT 06484
Tel: +1-888-676-1472
contact@ctinvestigativeservices.com
http://www.ctinvestigativeservices.com

SHERMAN**Ken Bennett (2010)**

Bennett PI
PO Box 721
Sherman, CT 06784
Tel: +1-203-610-4193
ken@bennettpi.com
http://www.bennettpi.com

**DELAWARE
WILMINGTON****James Gettier (1991)**

J.R. Gettier & Assocs Inc.
2 Centerville Rd.
Wilmington, DE 19808
Tel: +1-302-652-2700
Fax: +1-302-652-8699
jrg@gettier.com
http://www.gettier.com

John Slagowski (2007)

S & H Investigative Services
PO Box 12245
Wilmington, DE 19850
Tel: +1-302-999-9911
Fax: +1-302-992-9899
john@snh.net
http://www.snh.net

**DISTRICT OF COLUMBIA
WASHINGTON****Charles Pinck (2001)**

The Georgetown Group, Inc.
1901 Pennsylvania Ave., NW, #600
Washington, DC 20006
Tel: +1-202-656-9950
Fax: +1-801-659-7794
cpinck@georgetowngroup.com
http://www.georgetowngroup.com

**FLORIDA
BOYNTON BEACH****Barry Silvers (LIFE)**

Introspect Investigations Inc.
5330 Landon Circle
Boynton Beach, FL 33437-1670
Tel: +1-888-847-7177 or +1-561-734-1266
Fax: +1-561-734-1691
Private-l@att.net

BRANDON**Rene Trasorras (2013)**

Trasorras Intelligence Group
PO Box 3037
Brandon, FL 33509
Tel: +1-813-654-2173
Fax: +1-813-354-2438
rj@tiginfo.com
http://www.tiginfo.com

CAPE CORAL**Edward Shedden (2012)**

A Worldwide Person &
Information Locators &
Investigations, Inc.
108 S.E. 34th Lane
Cape Coral, FL 33904-4162
Tel: +1-239-945-1808
Fax: +1-239-540-8019
eshedden@aol.com
http://www.personinfolocators.com

CORAL SPRINGS**Patricia D'orsa-Dijamco (2010)**

Special Agent Investigations &
Security LLC
8428 Northwest 47 Dr.
Coral Springs, FL 33067
Tel: +1-954-663-6450
Fax: +1-954-344-6450
patricia@specialagentinvestigations.com
http://www.specialagentinvestigations.com

DAYTONA BEACH**J. Patrick Altus (1993)**

Falcon International Corp.
728 Fentress Blvd.
Daytona Beach
FL 32114
Tel: +1-386-274-1000
Fax: +1-386-274-5555
patrick@falconrepo.com

John Gaspar (2011)

All Florida Investigations &
Forensic Services, Inc.
140 S. Beach St., Ste. 412
Daytona Beach, FL 32114
Tel: +1-888-697-3478
Fax: +1-386-845-9265
jgaspar@afipi.com
http://www.afipi.com

Harvey Morse (LIFE)

Locators International, Inc.
2435 S. Ridgewood Ave.
Daytona Beach, FL 32119
Tel: +1-386-760-5000
Fax: +1-386-760-6400 or
+1-800-410-5665
harvey@probate.com
http://www.probate.com

DEERFIELD BEACH**Barry Silvers (1985)**

Introspect Investigations Inc.
2032 Harwood D
Deerfield Beach
FL 33442-3430
Tel: +1-888-847-7177
Fax: +1-561-734-1691
private-l@att.net

FT. LAUDERDALE**Jean Mignolet (1992)**

Mignolet Business Research
Consultants, Inc.
1314 E. Las Olas Blvd., Ste. 606
Ft. Lauderdale
FL 33301
Tel: +1-954-523-8737
Fax: +1-954-523-8634
investigators@mignolet.com
http://www.mignolet.com

HALLANDALE**Steve Doudnik (2012)**

General Investigation Services
1920 E Hallandale Beach Blvd., Ste. 618
Hallandale, FL 33009
Tel: +1-800-601-8019
Fax: +1-561-827-8182
generalpi@yahoo.com
http://www.generalpi.com

JACKSONVILLE**Halsey Fischer (2000)**

ICS Merrill
9485 Regency Sq. Blvd #400
Jacksonville, FL 32225
Tel: +1-615-499-4947
Fax: +1-888-746-7755
hfischer@icsmerrill.com
http://www.icsmerrill.com

Steven Stansbury (1999)

Steven L. Stansbury & Associates, Inc.
PO Box 11044, Jacksonville, FL 32239
Tel: +1-904-744-1633
Fax: +1-904-744-1618
steven@stansburypi.com
http://www.stansburypi.com

MELBOURNE**Jennings Harrison (1998)**

Eyewitness Investigations
6767 N Wickham Rd, Ste. 209
Melbourne, FL 32940
Tel: +1-321-255-1009
Fax: +1-321-255-5409
jh@TheEyewitness.com
http://www.TheEyewitness.com

MIAMI**Richard Ashenoff (1993)**

Ashenoff and Associates Inc.
11500 Southwest 32nd St., Ste. 100
Miami, FL 33165-2120
Tel: +1-305-227-5117
Fax: +1-305-227-5173
ashenoff@ashenoff.com
http://www.ashenoff.com

Mark McCabe (1992)

McCabe Associates, Inc.
1111 Brickell Ave., 11th Floor
Ste. 1100, Miami, FL 33131
Tel: +1-305-913-8628
Fax: +1-305-913-4101
solutions@mccabe1.com
http://www.mccabe1.com

Brian McGuinness (1991)

McGuinness & Associates Inc.
1900 Coral Way, Ste. 303, Miami, FL 33145
Tel: +1-305-858-9122
Fax: +1-888-335-3463
brian@fraudexaminer.com
http://www.fraudexaminer.com

Steven Sessler (1998)

Sessler & Lopez Investigations Inc.
4101 N.W. 2nd St. Miami, FL 33126
Tel: +1-305-643-3380
Fax: +1-305-643-0476
slinv@bellsouth.net

Melvin Weiss (LIFE)

M W Association, Ltd.
PO BOX 693395, Miami, FL 33269
Tel: +1-305-932-0302
Fax: +1-305-932-0312

Michael Youngs (2007)

The Latin America Group, Inc.
20801 Biscayne Blvd, Ste. 403
Miami, FL 33180
Tel: +1-800-414-8008
info@thelatinamericagroup.com
http://www.thelatinamericagroup.com

POMPANO BEACH**David Marks (LIFE)**

David R. Marks International
2575 South East 9th Street
Pompano Beach, FL 33062-6708
Tel: +1-954-782-8500
drm-pi@msn.com
http://www.davidmarks.com

Richard McCarty (1996)

Altima Information Services, Inc.
720 E. McNab Road
Pompano Beach, FL 33060
Tel: +1-954-784-1915 x212
Fax: +1-954-784-1920
rmccarty@altimainfo.com
http://www.altimainfo.com

PORT ST. LUCIE**Francis Donohue (LIFE)**

Foxtech International Inc.
2125 S.E. Erwin Road
Port St. Lucie, FL 34952
Tel: +1-561-335-7562
Fax: +1-561-335-9305

ST. PETERSBURG**Claude Lavaron (LIFE)**

Ex-Cel Investigations
PO Box 22124
St. Petersburg, FL 33742
Tel: +1-727-527-5440
Fax: +1-727-527-2442
excel@digital.net
http://www.ex-celpi.com

TAMPA**Rockne Cooke (1989)**

Commercial Index Bureau, Inc.
PO Box 261269, Tampa, FL 33615
Tel: +1-800-888-5266
Fax: +1-800-772-3150
Rfc@Cibpi.com
http://www.cibpi.com

VALRICO**Bruce Anderson (2012)**

Cyber Investigation Services
3433 Lithia Pinecrest Rd., #190
Valrico, FL 33596
Tel: +1-813-315-8484
Fax: +1-813-333-7346
bruce@cyberinvestigationsservices.com
http://www.cyberinvestigationsservices.com

VENICE**Roy Winkelmann (LIFE)**

Winkelmann Associates Inc.
200 Fareham Dr.
Venice, FL 34293
Tel: +1-941-408-0687
rw@winkintel.com
http://www.winkelmanninvestigations.com

WEST PALM BEACH**Gary McDaniel (1979)**

Pretext Services Inc.
13716 75th Lane, N
West Palm Beach, FL 33412
Tel: +1-561-792-1799
Fax: +1-561-792-8085
pretext@bellsouth.net
http://www.pretextpi.com

GEORGIA**LAWRENCEVILLE****Robin Martinelli (2013)**

Martinelli Investigations, Inc.
485 South Perry St., Ste. D
Lawrenceville, GA 30045
Tel: +1-770-337-3999
Fax: +1-770-236-8220
gaprivateeye@bellsouth.net
http://www.martinelliinvestigations.com

MARIETTA**John Holliday (2005)**

Holliday Investigative Services, Inc.
1860 Sandy Plains Rd., Ste. 204
Marietta, GA 30066
Tel: +1-770-428-5700
Fax: +1-770-428-9053
dettfuzz@bellsouth.net
http://www.hollidayinvestigations.com

George Taylor (2013)

AFPI Global Investigations
3162 Johnson Ferry Rd.,
Bldg. 260, Ste. 631
Marietta, GA 30062
Tel: +1-404-697-9362
Fax: +1-404-394-3093
george@afpiglobal.com
http://www.afpiglobal.com

HAWAII**HONOLULU****Steve Goodenow (LIFE)**

The Hawaii Investigative Group, LLC
736 South St., Ste. 103
Honolulu, HI 96813
Tel: +1-808-526-3245
Fax: +1-808-526-3246
steve@goodenowpi.com
http://www.goodenowpi.com

Frederick Coward, Jr. (2002)

Investigative Services
International (ISI) Corporation
Century Square Building
1188 Bishop St., Suite 2502
Honolulu, HI 96813
Tel: +808-781-8183
Fax: +253-981-8581
info@isi-corp.com
http://www.isi-corp.com

KAMUELA**John Wood (2003)**

Wood & Tait, LLC
PO Box 6180
64-5249 Kauakea Rd.
Kamuela, HI 96743
Tel: +1-808-885-5090
Fax: +1-888-630-0500
jwood@woodtait.com
http://www.woodtait.com

ILLINOIS**ALGONQUIN****Jay Barker (2002)**

Detectives.Com
2413 W. Algonquin Rd., Ste. 508
Algonquin, IL 60102
Tel: +1-888-888-9011
Fax: +1-888-777-5684
jbarker@detectives.com
http://www.detectives.com

ARLINGTON HEIGHTS**Robert Faerber (2010)**

Aurico Investigations LLC
116 W. Eastman St., 2nd Flr.
Arlington Heights, IL 60004
Tel: +1-847-483-5470
Fax: +1-847-259-0283
rfaerber@aurico.com
http://www.auricoinvestigations.com

BLOOMINGDALE**Richard Fries (LIFE)**

K A R D Protection Group, Inc.
121 Fairfield Way, 3rd Flr.
Bloomington
IL 60108
Tel: +1-866-273-KARD [5273] x225
Fax: +1-630-523-5607
rjf85@sbcglobal.net
http://www.KARDgroup.com

BLUE ISLAND**Christopher Thornton (2007)**

A & R Security Services, Inc.
2552 W.135th St.
Blue Island, IL 60406
Tel: +1-708-389-3830
Fax: +1-708-389-7734
chris@arsecurity.com
http://www.arsecurity.com

BUFFALO GROVE**Roy Bucklin (2007)**

75 Newfield Dr.
Buffalo Grove, IL 60089
Tel: +1-847-913-1532
rbuckpi@sbcglobal.net

CHICAGO**Don Haworth (2005)**

Chicagoland Detective Services, Inc.
1903 N. Milwaukee Ave., 1st Flr.
Chicago, IL 60647-4320
Tel: +1-773-772-2651
Fax: +1-773-772-7319
falconpi@aol.com
http://www.falconpi.com

Kathryn LeFevour (2010)

Edward R. Lefevour & Associates, Ltd.
120 W. Madison St., Ste. 1108
Chicago, IL 60602
Tel: +1-312-666-5114
Fax: +1-312-666-5114
info@lefevourpi.com
http://www.lefevourpi.com

Bill Vincent (1984)

VTS Investigations, LLC
79 West Monroe St., Ste. 1122
Chicago, IL 60603
Tel: +1-800-538-4464
Fax: +1-847-888-8588
bill@pichicago.com
http://www.pichicago.com

CLARENDON HILLS**Daniel Bellich (2009)**

Protek International Inc.
115 55th St., Ste. 400
Clarendon Hills, IL 60514
Tel: +1-630-986-8204
Fax: +1-630-321-1430
dbellich@protekintl.com
http://www.protekintl.com

DES PLAINES**Christopher Bauer (2004)**

Bauer Risk Management
PO Box 135
Des Plaines, IL 60016
Tel: +1-847-827-0077
Fax: +1-847-637-0395
christopherrbauer@me.com
http://www.rbauerpi.com

GILBERTS**Tim Kizorek (2011)**

PhotoFAX Inc.
PO Box 225
Gilberts, IL 60136
Tel: +1-800-659-9351
Fax: +1-800-875-7898
tim@photofax.net
http://www.photofax.net

GLEN CARBON**Gregory Kellerman (2005)**

Kellerman Investigations, Ltd.
60 South Main St.
Glen Carbon, IL 62034
Tel: +1-618-288-6662
Fax: +1-618-288-6668
klaxon_greg@yahoo.com
http://www.kellermaninvestigations.com

MATTESON

Kenneth Webb (2000)
Fact Finders Group, Inc.
4747 Lincoln Mall, Ste. 415
Matteson, IL 60443
Tel: +1-708-283-4200
Fax: +1-708-283-0186
kenwebb@factfindersgroup.com
http://www.factfindersgroup.com

MCHENRY

Daniel Kinnerk (1988)
K's Investigations & Security Service
116 N Green St., Mchenry, IL 60050-5640
Tel: +1-815-385-3310
Fax: +1-815-385-0579
invstgtr@comcast.net

NAPERVILLE (CHICAGO)

William Lapworth (1978)
Research Consultants Group, Inc.
PO Box 4348
Naperville (Chicago), IL 60567-4348
Tel: +1-630-961-4445
Fax: +1-630-961-5080
wlapworth@researchconsultants.net
http://www.researchconsultants.net

PEORIA

Larry McWherter (LIFE)
Security Services Inc.
1009 N. Sheridan Road, Peoria, IL 61606
Tel: +1-309-674-4321
Fax: +1-309-674-9357
ldm@securityservicesinc.us

WESTCHESTER

John Hanrahan (2009)
Hanrahan Investigations, Inc.
9914 Derby Lane, Ste. 201
Westchester, IL 60154
Tel: +1-708-343-1888
Fax: +1-708-343-1892
jwhan@hanrahaninvestigations.com

Richard McGough (1981)

McGough & Associates
10150 W. Roosevelt Road
Westchester, IL 60154
Tel: +1-708-343-5600
Fax: +1-708-343-6940
investigations@mcgoughinc.com
http://www.mcgoughinc.com

WOODRIDGE

James Miller (1998)
Investigative Services Agency, Inc.
1258 Golfview Dr.
Woodridge, IL 60517
Tel: +1-312-755-9700
Fax: +1-312-755-9707
isajmiller@aol.com
http://www.investigative-agency.com

**INDIANA
BLOOMINGTON**

Don Johnson (2007)
Trace Investigations, Inc.
517 N. Walnut St., Ste. 2
Bloomington, IN 47404
Tel: +1-812-334-8857
Fax: +1-812-334-2274
don@traceinvestigations.com
http://www.traceinvestigations.com

EVANSVILLE

Richard Curby (LIFE)
Ira E Clark Detective Agency Inc.
10 Chestnut Street
Evansville, IN 47713-1022
Tel: +1-812-424-2448
Fax: +1-812-424-5234
clarks838@aol.com
http://www.clark-security.com

INDIANAPOLIS

William Lapworth (1978)
Research Consultants Group
PO Box 50250
Indianapolis, IN 46250
Tel: +1-800-255-8976
Fax: +1-317-842-4667
wlapworth@researchconsultants.net
http://www.researchconsultants.net

C. Tim Wilcox (2002)

International Investigators, Inc.
3216 North Pennsylvania St.
Indianapolis, IN 46205-3414
Tel: +1-317-925-1496
Fax: +1-317-926-1177
timwilcox@iivweb.net
http://www.internationalinvestigators.com

**IOWA
DAVENPORT**

Michael Duffy (1971)
Per Mar Security Services
PO Box 4227, Davenport, IA 52808
Tel: +1-563-441-7460
Fax: +1-563-359-6700
mduffy@permarsecurity.com
http://www.permarsecurity.com

DES MOINES

Brad Duffy (2012)
Per Mar Security Services
720 E. 2nd Street, Des Moines, IA 50309
Tel: +1-515-244-5660
Fax: +1-563-344-8104
brad.duffy@permarsecurity.com
http://www.permarsecurity.com

**KENTUCKY
CRESTVIEW HILLS**

Gregory Fairbanks (1985)
Superior Service Bureau
215 C Thomas More Park
Crestview Hills, KY 41017
Tel: +1-859-344-1200
Fax: +1-859-344-1212
SSB@fuse.net

**LOUISIANA
BATON ROUGE**

Julius Bombet (1989)
Bombet & Associates
11220 N. Harrell's Ferry Road
Baton Rouge, LA 70816
Tel: +1-225-275-0796
Fax: +1-225-272-3631
buddy@bombet.com
http://www.bombet.com

LAFAYETTE

James "Chip" Romero (1990)
Hub Enterprises Inc
PO Box 3162, Lafayette, LA 70502
Tel: +1-800-873-0933
Fax: +1-800-436-4399
jmiguez@hubenterprises.com

METAIRIE (NEW ORLEANS)

Loretta Bickerstaff (LIFE)
Bickerstaff Services, Inc.
3504 Harvard Avenue
Metairie, LA 70006
Tel: +1-504-889-0868
lorettabla@aol.com

NEW ORLEANS

Raymond Pendleton (LIFE)
Raymond A Pendleton & Assocs Inc.
PO Box 6407
New Orleans, LA 70174
Tel: +1-504-392-3862
Fax: +1-504-392-3862
Rayapen@bellsouth.net

LOUISIANA

Joseph Vinson (1973)
Vinson Guard Service & Detective Agency, Inc.
955 Howard Ave.
New Orleans, LA 70113
Tel: +1-504-529-2260
Fax: +1-504-529-4393
jvinsonguard@vinsonguard.com
http://www.vinsonguard.com

Christine Vinson (1999)

Vinson Guard Service & Detective Agency, Inc.
955 Howard Ave., New Orleans, LA 70113
Tel: +1-504-529-2260
Fax: +1-504-529-4393
cvinson@vinsonguard.com
http://www.vinsonguard.com

**MARYLAND
ANNAPOLIS**

David Cohen (2013)
David Cohen Investigations
1121 August Drive, Annapolis, MD 21403
Tel: +1-410-216-9331
Fax: +1-410-216-9338
djc73pi@yahoo.com

BALTIMORE

Rockne Cooke (1989)
Commercial Index Bureau, Inc.
PO Box 24090, Baltimore, MD 21227
Tel: +1-410-242-8150
Fax: +1-410-536-4744
rfc@cibpi.com
http://www.cibpi.com

CAMBRIDGE

Caryn Gloyd (2007)
S & H Investigative Services
1312 Taylors Island Rd., PO Box 601
Cambridge, MD 21613
Tel: +1-410-228-2020
Fax: +1-302-992-9899
caryn@snh.net
http://www.snh.net

GREENBELT

Frank Crumbley (1989)
Associated Investigators, Inc.
7245 Hanover Pkwy., Ste. C
Greenbelt, MD 20770
Tel: +1-301-925-6929
Fax: +1-301-925-6927
fcrumbley@associatedinvestigator.com
http://www.associatedinvestigator.com

**MASSACHUSETTS
ANDOVER**

Charles McLaughlin (2003)
McLaughlin Investigative Group, Inc.
300 Brickstone Square, Ste. 201
Andover, MA 01810
Tel: +1-978-474-8801
Fax: +1-978-474-8802
chuck@mclaughlinpi.com
http://www.McLaughlinPI.com

BERLIN

Peter Hoffman (1994)
Subtle Investigations Corp.
183 Randall Rd., Berlin, MA 01503
Tel: +1-212-794-1000
Fax: +1-212-794-1919
peterhoffman@subtleinvestigations.com

BOSTON

Thomas Shamshak (2007)
Shamshak Investigative Services, Inc.
20 Park Plaza, Ste. 400
Boston, MA 02116-4399
Tel: +1-800-422-0944
Fax: +1-978-663-7611
tshamshak@aol.com
http://www.shamshakpi.com

NORWELL**Robert Long (1992)**

Bob Long Investigations Group LLC
604 River St.
Norwell, MA 02061
Tel: +1-617-590-1011
Fax: +1-617-848-5481
BL@BobLongPI.com

WEST SPRINGFIELD**Frank Grabowski (LIFE)**

Atwood Security Services Inc.
1346 Elm Street
West Springfield, MA 01089
Tel: +1-413-788-0474

**MICHIGAN
FENTON****Frank Watts (LIFE)**

PO Box 952
Fenton, MI 48430
Tel: +1-313-982-5331
Fax: +1-313-982-6910
fwattsjr@aol.com

GROSSE POINTE FARMS**Robert Pertuso (2007)**

RK International, Inc.
100 Kercheval Avenue, Ste. A
Grosse Pointe Farms, MI 48236
Tel: +1-313-886-4492
Fax: +1-313-731-0230
robertpertuso@rkinternationalinc.com
http://www.rkinternationalinc.com

JACKSON**Alfred Cavasin (2007)**

Great Northern Sentry Company
2901 W. Michigan Ave.
Jackson, MI 49202
Tel: +1-517-783-2225
Fax: +1-517-783-4290
alceo@greatnorthernsentry.com
http://www.greatnorthernsentry.com

SOUTH LYON**James Mickle (LIFE)**

World Investigations & Security Engineers Inc.
24809 Valleywood, South Lyon, MI 48178
Tel: +1-248-486-1870
Fax: +1-248-486-1876

TRAVERSE CITY**John Hardy (1993)**

J Hardy Investigative Services, LLC
PO Box 2038
Traverse City, MI 49685-2038
Tel: +1-231-947-3252
Fax: +1-231-947-2007
jhis@charter.net
http://www.jhardyinvestigativeservices.com

MISSISSIPPI**JACKSON****Robert Pendleton (1991)**

Pendleton Detectives of Mississippi, Inc.
PO Box 14005
Jackson, MS 39236
Tel: +1-601-952-0115
Fax: +1-601-952-0884
pendleton1@bellsouth.net
http://www.pendletonsecurity.com/

MISSOURI**BRIDGETON (ST. LOUIS)****Ron Buretta (1995)**

Ron R. Buretta & Associates, Inc.
3550 McKelvey Rd., Ste. 204B
Bridgeton, MO 63044
Tel: +1-314-291-1515
Fax: +1-314-291-4059
ronburetta@ronburetta.com
http://www.ronburetta.com

SAINT LOUIS**Jessica Leykam Barbieri (2007)**

P.D.I. Investigations, Inc.
211 South Central Ave., Ste. 101
Saint Louis, MO 63105
Tel: +1-314-863-9225
Fax: +1-314-863-4970
pdi1@pdi-web.com
http://www.pdi-web.com

SPRINGFIELD**Harold Nester (2009)**

Worldwide Resources, Inc.
1325 W. Sunshine St., # 517
Springfield, MO 65807
Tel: +1-417-883-1700
Fax: +1-417-883-1742
hnester@worldwide2001.com
http://www.worldwide2001.com

MONTANA**KALISPELL****Randy Torgerson (2010)**

RTPI, Inc.
175 Hutton Ranch Rd., Ste. 103-166
Kalispell, MT 59901
Tel: +1-949-716-5338
Fax: +1-877-408-5959
intelpi@rtpi.us
http://www.rtpi.us

NEVADA**CARSON CITY****Keith Barna (1999)**

Barna Private Investigations & Security
123 West Nye Lane #129
Carson City, NV 89706
Tel: +1-775-831-0505
Fax: +1-408-446-9502
Kbarna@Worldnet.Att.Net

LAS VEGAS**Jonathan Girard (2001)**

Elite Investigations
7435 S. Eastern Ave., Ste. 5-284
Las Vegas, NV 89123
Tel: +1-702-897-8473
Fax: +1-702-270-8650
Elitevegas@aol.com

Robert (Bobby G) Gronauer (2012)

Bobby G & Associates
500 S. Rancho Drive, #17
Las Vegas, NV 89106
Tel: +1-702-331-4910
Fax: +1-702-331-4911
bobbyg@bggaa.com
http://www.bggaa.com

Heidi Johnson (2000)

Ally Investigations
2232 S. Nellis Blvd., Ste. 115
Las Vegas, NV 89104
Tel: +1-702-432-9125
Fax: +1-702-432-6991
AllyInvestigations@juno.com

Alan Kaplan (LIFE)

Attorneys' Investigative Consultants
Box 230-140, 5841 E. Charleston Blvd.
Las Vegas, NV 89142
Tel: +1-702-453-4500
Fax: +1-702-438-8986
Akaplan@LasVegasPI.com
http://www.lasvegasp.com

Peter Maheu (1998)

Global Intelligence Network, Corp.
2190 E. Pebble Rd., Ste 150
Las Vegas, NV 89123
Tel: +1-702-891-0500
Fax: +1-702-891-0555
maheu@globalintelligence.net
http://www.globalintelligence.net

Dawn Ricci (2005)

All State Investigations, Inc.
Las Vegas, NV
Tel: +1-732-577-1112
Fax: +1-732-577-1113
Dawn@94truth.com
http://www.allstateinvestigation.com

LAUGHLIN**David Warkentine (2007)**

Stealth Partners, Inc.
PO Box 31441
Laughlin, NV 89028-1441
Tel: +1-877-798-7025
Fax: +1-877-739-5101
Dave@StealthPartners.com
http://www.stealthpartners.com

RENO**Edward Gladding (1983)**

Gladding & Michel Reno
530 California Avenue
Reno, NV 89509-1448
Tel: +1-775-323-3971
Fax: +1-775-323-3724
gmreno@sbcglobal.net

NEW JERSEY**ALLENDALE****Reginald Montgomery (1982)**

R.J. Montgomery Associates
PO Box 329, Allendale, NJ 07401
Tel: +1-800-327-7394
Fax: +1-201-825-8878
reggie@njinvestigator.com
http://www.njinvestigator.com

FREEHOLD**Jimmie Mesis (2007)**

Excerion, LLC
4400 Rt 9, Ste. 1000
Freehold, NJ 07728
Tel: +1-732-303-0093
Fax: +1-732-308-3314
jim@excerion.com
http://www.excerion.com

Dawn Ricci (2005)

All State Investigations, Inc.
PO Box 7589, Freehold, NJ 07728
Tel: +1-732-577-1112
Fax: +1-732-577-1113
dawn@94truth.com
http://www.allstateinvestigation.com

WOODBIDGE**Cornelius Grondin (LIFE)**

The Grondin Detective Agency
Grondin Executive Manor, 655 Amboy Avenue
Woodbridge, NJ 07095-3145
Tel: +1-732-634-4545
Fax: +1-732-634-4495
chgrondinj@aol.com

NEW YORK**ALBANY****Scott Schuster (2004)**

Servico Investigation Co.
283 Washington Ave.
Albany, NY 12206
Tel: +1-518-463-8550
Fax: +1-518-463-1189
inc@servico.com
http://www.servicoinvestigation.com

BROOKLYN**Nancy Jane Dzubin York (1998)**

First Field Investigative Services Inc.
216 9th St., PO Box 150601
Brooklyn, NY 11215
Tel: +1-718-369-6300
Fax: +1-718-369-7443
nancyyork@msn.com
http://www.firstpi.com

Joseph Mazzilli (1989)

Protect-All Security and Investigations Inc.
315 Leonard St.
Brooklyn, NY 11211
Tel: +1-718-599-5915
Fax: +1-718-599-5919
assistnyc@aol.com
http://www.protectallsecurity.com

Mark Moyses (2005)

Mark Moyses, P.I.
2819 West 12th St., Ste. 7-0
Brooklyn, NY 11224
Tel: +1-718-791-8831
Fax: +1-718-265-0470
nypd85@aol.com

Steven Rambam (1991)

Pallorium Inc.
PO Box 155, Midwood Station
Brooklyn, NY 11230
Tel: +1-212-969-0286
Fax: +1-212-858-5720
rambam@pallorium.com

Emmanuelle Welch (2011)

French Connection Research
495 Henry St., #137
Brooklyn, NY 11231
Tel: +1-202-241-2416
Fax: +1-866-563-1443
contact@frenchpi.com
http://www.frenchpi.com

LONG ISLAND CITY**Jose Peña (2013)**

Centinela, LLC
10-91 Jackson Ave., Ste. #5
Long Island City
NY 11101
Tel: +1-347-730-4737
Fax: +1-347-730-4253
jpena@centinela1.com
http://www.centinela1.com

MINEOLA**John Giglio (LIFE)**

North American Investigations Inc.
199 Willis Avenue
Mineola, NY 11501
Tel: +1-800-724-8080
Fax: +1-800-724-8075
info@pvteyes.com
http://www.pvteyes.com

NEW CITY**Warren Sonne (2005)**

Pinnacle Protective Services, Inc.
9 Ilana Lane
New City, NY 10956
Tel: +1-877-843-6974
warren@thenypi.com
http://www.thenypi.com

NEW YORK**Mark Christopher (2011)**

The Arkin Group LLC
590 Madison Avenue
35th Flr.
New York, NY 10022
Tel: +1-212-333-0285
Fax: +1-212-333-0246
mchristopher@thearkinggroup.com
http://www.thearkinggroup.com

John Devine (2002)

The Arkin Group LLC
590 Madison Avenue, 35th Flr.
New York, NY 10022
Tel: +1-212-333-0204
Fax: +1-212-333-0246
jackdevine@thearkinggroup.com
http://www.thearkinggroup.com

Bo Dietl (1989)

Beau Dietl & Associates
One Pennsylvania Plaza, 50th Flr.
New York, NY 10119
Tel: +1-212-557-3334
Fax: +1-212-557-4737
bo@investigations.com
http://www.investigations.com

Michael Falsone (2011)

The Stonegate Agency, Inc.
327 East 34th St., Ste. 5F
New York, NY 10016
Tel: +1-212-248-3600
Fax: +1-212-248-7676
MikeStone9@aol.com

Charles-Eric Gordon (1999)

Charles-Eric Gordon, Esq. Investigative Counsel
PO Box 514, Plainview, NY 11803-0514
Tel: +1-516-433-5065
Fax: +1-516-681-5528
sleuth32@aol.com

Michael Kessler (1991)

Kessler International
45 Rockefeller Plaza, 20th Floor
New York, NY 10111-2000
Tel: +1-212-286-9100
Fax: +1-212-730-2433
mail@investigation.com
http://www.investigation.com

Joann Kunda (1989)

Rebus International, Inc.
718 Broadway, 9th Flr.
New York, NY 10003
Tel: +1-212-674-8400
Fax: +1-212-674-8428
rebusintl@aol.com

John Leto (1998)

JL & Associates, Ltd.
521 Fifth Ave., Ste. 1700
New York, NY 10175
Tel: +1-212-949-6530
Fax: +1-212-949-6531
info@JLAssoc.com
http://www.ConsultAPI.com

Mark McCabe (1992)

McCabe Associates, Inc.
230 Park Ave., 10th Floor, Ste. 1000
New York, NY 10169
Tel: +1-212-808-3029
Fax: +1-212-808-3020
mmccabe@mccabe1.com
http://www.mccabe1.com

James Mintz (1985)

James Mintz Group Inc.
32 Avenue Of The Americas, 21st Flr.
New York, NY 10013
Tel: +1-212-489-7100
Fax: +1-212-489-7037
contact@mintzgroup.com
http://www.mintzgroup.com

David Nolan (2007)

Klink & Co. Inc.
2 Penn Plaza, Ste. 1500
New York, NY 10121
Tel: +1-212-292-5116
Fax: +1-212-292-5117
dnolan@klink-co.com
http://www.klink-co.com

Susan Peterson (1998)

Kessler International
45 Rockefeller Plaza, 20th Floor
New York, NY 10111-2000
Tel: +1-212-286-9100
Fax: +1-212-730-2433
speterson@investigation.com
http://www.investigation.com

Thomas Reilly (1999)

The Reilly International Group Ltd.
157 East 75th St., Ste. 1 East
New York, NY 10021
Tel: +1-212-737-3315
Fax: +1-212-918-7978
info@reillyinternationalgroup.com
http://www.reillyinternationalgroup.com

Dawn Ricci (2005)

All State Investigations, Inc.
New York, NY
Tel: +1-732-577-1112
Fax: +1-732-577-1113
Dawn@94truth.com
http://www.allstateinvestigation.com

Thomas Ruskin (2010)

CMP Protective & Investigative Group, Inc.
Five Penn Plaza, 23rd Flr.
New York, NY 10001
Tel: +1-212-734-2312
Fax: +1-212-452-1445
truskin@cmp-group.com
http://www.cmp-group.com

Joseph Saponaro (1986)

Elite Investigations Ltd.
538 West 29th St., New York, NY 10001
Tel: +1-212-629-3131
Fax: +1-212-594-2394
jsaponaro@eliteinvestigations.com
http://www.eliteinvestigations.com

John Smaragdakis (1994)

GSS Security Services, Inc.
250 W. 49th St., Ste. 705, New York, NY 10019
Tel: +1-212-764-5400
Fax: +1-212-764-0213
johns@gss-security.com
http://www.gss-security.com

Earle Gay (2012)

38 E. 37th St., #95, New York City, NY 10016
Tel: +1-717-399-3090
Fax: +1-717-945-5320
erlgei@yahoo.com

OCEANSIDE**Daniel Ribacoff (1996)**

International Investigative Group Ltd.
2901 Long Beach Rd., Ste. 5
Oceanside, NY 11572
Tel: +1-516-764-3242
Fax: +1-516-764-3362
iigpi@aol.com
http://www.iigpi.com

PATTERSON**Jeanne LaLuna (2013)**

Bounty Hunter Recovery Specialists, Inc.
2212 Route 22, Patterson, NY 12563
Tel: +1-845-278-9087
Fax: +1-845-278-9293
bhnsny@aol.com
http://www.bountyhunterrecovery.com

ROCHESTER**Mark McCabe (1992)**

McCabe Associates, Inc.
4424 Lyell Rd., Rochester, NY 14606
Tel: +1-585-349-4190 x100
Fax: +1-585-349-4192
mmccabe@mccabe1.com
http://www.mccabe1.com

SYRACUSE**Malcolm Plummer (LIFE)**

PIB Investigations Inc.
614 North Salina Street, Syracuse, NY 13208
Tel: +1-315-474-7773
Fax: +1-315-426-1542
mplummer@pibinvestigations.com
http://www.pibinvestigations.com

**NORTH CAROLINA
ARDEN****Joseph Siske (2012)**

Atlantic Southeast Investigations
PO Box 960
Arden, NC 28704
Tel: +1-828-230-5248
asidetive@bellsouth.net
http://www.asidetive.com

CHAPEL HILL**Kenneth Taylor (2010)**

Marksmen Inc.
212 E. Rosemary St.
Chapel Hill, NC 27514
Tel: +1-919-918-2800
Fax: +1-919-918-2804
kt@marksmen.com
http://www.marksmen.com

CHARLOTTE**Kelly (Jan) Barefoot (1998)**

Barefoot Private Investigations
1011 East Morehead St., Ste. 110
Charlotte, NC 28204-2812
Tel: +1-704-377-1000
Fax: +1-704-343-9226
barefoot@barefootpi.com

Don Hubbard (2012)

Don L. Hubbard and Associates, Inc.
PO Box 77905
Charlotte, NC 28271-7021
Tel: +1-704-814-0773
Fax: +1-704-814-0773
don@donlhubbardandassociates.com
http://www.donlhubbardandassociates.com

William Lapworth (1978)

Research Consultants Group, Inc.
PO Box 19109
Charlotte, NC 28219-9109
Tel: +1-866-722-2372
Fax: +1-704-439-3861
wlapworth@researchconsultants.net
http://www.researchconsultants.net

Joseph Paonessa (2010)

JP Investigative Group, Inc.
9716-B Rea Rd., #211
Charlotte, NC 28277
Tel: +1-704-243-1137
Fax: +1-704-243-1224
info@jpinvestigations.com
http://www.jpinvestigations.com

ENKA**Gregory Hatten (2012)**

TJ Conner and Associates
PO Box 1859, Enka, North Carolina 28728
Tel: +1-828-280-0180
Fax: +1-828-202-6762
gahatten@yahoo.com
http://www.tjconnerassociates.com

GOLDSBORO**David Grimes (1999)**

Grimes Investigations, Inc.
229 E. Walnut St.
Goldsboro, NC 27530
Tel: +1-919-736-7289
Fax: +1-919-736-0392
dgrimespi@bellsouth.net

GREENSBORO**Greg Scott (1987)**

Scott & Associates Investigations, Inc.
411 Fisher Avenue
World Services Building
Greensboro, NC 27401
Tel: +1-336-854-1954
Fax: +1-877-721-2801
investigator@pobox.com
http://www.USDetective.com

HIGH POINT**Audra Coleman (2008)**

Cameo Investigations
PO Box 6766
High Point, NC 27262
Tel: +1-888-475-3737
Fax: +1-336-475-3736
Cameopi@aol.com
http://www.Cameoinvestigations.com

PINEHURST**Gary Batten (1991)**

Batten Investigations, Inc.
PO Box 835
Pinehurst, NC 28370
Tel: +1-910-673-0547
Fax: +1-910-673-4026
pi@batteninvestigations.com
http://www.batteninvestigations.com

Brian Casey (2005)

Batten Investigations, Inc.
PO Box 835, Pinehurst, NC 28370
Tel: +1-910-673-0547
Fax: +1-910-673-4026
pi@batteninvestigations.com
http://www.batteninvestigations.com

RALEIGH**Carlyle Poindexter (1998)**

Poindexter & Associates, Inc.
PO Box 37284, 5 Hargett Street, Ste. 401
Raleigh, NC 27627
Tel: +1-800-373-2804
Fax: +1-919-834-7039

WINSTON-SALEM**Jim Foster (1987)**

Agency-One Investigations Inc.
1332 Ashley Square, Ashleybrook Lane
Winston-Salem, NC 27103-2949
Tel: +1-336-760-4000
Fax: +1-336-760-4155
cobra163@aol.com
http://www.a1investigations.com

Tim McIntyre (1995)

Global Security & Information, Inc.
1365 Westgate Center Dr., Ste. K-2
Winston-Salem, NC 27103
Tel: +1-888-884-2928
Fax: +1-888-545-7137
tim@gsaii.com
http://www.gsaii.com

**NORTH DAKOTA
BISMARCK****Bill Butcher (LIFE)**

W.T. Butcher & Assocs Ltd.
1531 Country Lane
Bismarck, ND 58503
Tel: +1-701-224-1541
Fax: +1-701-224-1097
bill.wtba@midconetwork.com
http://www.northdakotapi.com

OHIO**CINCINNATI****Celine Estill-Latham (1981)**

Active Detective Bureau Inc.
4525 Bell's Lane, Ste. 187
Cincinnati, OH 45244
Tel: +1-513-541-6600
Fax: +1-513-735-4212
activedb@msn.com

Lorraine Galvin (2008)

Kreller Business Information Group, Inc.
817 Main St., Ste. 300
Cincinnati, OH 45202
Tel: +1-513-723-8900
Fax: +1-513-723-8909
lgalvin@kreller.com
http://www.kreller.com

Claude Hinds (LIFE)

Cal Crim, Inc.
11177 Reading Road
Cincinnati, OH 45241
Tel: +1-513-563-5500
Fax: +1-513-563-8362
CCI13@aol.com

Gregg Hollenbaugh (2007)

Cal Crim, Inc.
1117 Reading Rd.
Cincinnati, OH 45241
Tel: +1-513-563-5500
Fax: +1-513-563-8362
gregg@calcrim.net
http://www.calcrim.net

CLEVELAND**Charles Augustine (1993)**

Security Services Center
PO Box 347146
Cleveland,
OH 44134-7146
Tel: +1-440-843-2697
secservcent@att.net

Peter Gray (2012)

Peter Gray Investigation LLC
5136 Richmond Dr.
Cleveland, OH 44146
Tel: +1-216-595-9800
Fax: +1-216-595-9888
pjgpi@aol.com

James Szell (1997)

Corporate Investigative Services, Inc.
31400 Bradley Rd.,
North Olmsted
Cleveland, OH 44070
Tel: +1-440-614-0100
Fax: +1-440-614-0120
jimszell@cispros.com
http://www.cispros.com

DAYTON**Gary Kutty (2007)**

Kutty & Associates, LLC
4600 South Dixie Dr.
Dayton, OH 45439
Tel: +1-937-395-3059
Fax: +1-937-294-0156
gary@kuttyassociates.com
http://www.kuttyassociates.com

HIDEAWAY HILLS**Warren Levicoff (2010)**

International Detective Services
c/o Hideaway Hills Club
22 Hideaway Hills Lane
Route 1, PO Box 18
Hideaway Hills, OH 43107
Tel: +1-740-569-7444
Fax: +1-215-701-0799
info@detectiveagency.us

REYNOLDSBURG/CENTRAL OHIO**Terry Myer (2010)**

Columbus Detective Agency, Inc.
1696 Brice Rd.
Reynoldsburg, OH 43068
Tel: +1-614-864-0007
Fax: +1-614-322-7233
docspi@aol.com
http://www.columbusdetectiveagency.com

TOLEDO**Gary Ericson (1994)**

Gary T. Ericson, Licensed P.I.
3023 Maeterlinck Ave.,
PO Box 141337
Toledo, OH 43614
Tel: +1-419-385-7639
Fax: +1-419-385-7640
GERic15281@aol.com

**OKLAHOMA
TULSA**

Rodney "Rod" Baker (2011)
Baker & Baker, Ltd.
401 S. Boston Ave., Ste. 415
Tulsa, OK 74103
Tel: +1-918-744-0054
Fax: +1-918-744-0053
rbaker@bakerltd.com
http://www.bakerltd.com

Gary Glanz (1990)
Gary Glanz & Associates, Inc.
PO Box 700090
Tulsa, OK 74170-0090
Tel: +1-918-742-0075
Fax: +1-918-745-9799
gary@garyglanz.com
http://www.garyglanz.com

EUGENE

Virgil Wilson (1985)
Attorney At Law
PO BOX 40836
Eugene, OR 97404
Tel: +1-541-556-2096
Fax: +1-541-607-6565
vjwilsoniii@msn.com

PORTLAND

Brian Freeland (1991)
Lawyer's Legal Service LLC
PO Box 9007
Portland, OR 97207-9007
Tel: +1-503-224-7911
Fax: +1-503-224-9611
lls9007@gmail.com

**PENNSYLVANIA
HARRISBURG**

Daniel Benny (2013)
Dr. Daniel J. Benny,
Private Investigator & Security Consultant
202 Valley Rd.
Harrisburg, PA 17104
Tel: +1-717-238-1740
Fax: +1-717-238-1741
drbenny@bennypi.com
http://www.bennypi.com

John Shinkowsky (2013)
Shinkowsky Investigations
4511 Jonestown Road, 2nd Flr.,
PO Box 126538, Harrisburg, PA 17109
Tel: +1-717-540-0631
Fax: +1-800-996-1246
jshin@harrisburgpi.com
http://www.harrisburgpi.com

HORSHAM

Galen Clements (2002)
Clements Global Services LLC
240 Gibraltar Rd., Ste. 150
c/o NFC Global
Horsham, PA 19044
Tel: +1-215-341-2299
Fax: +1-215-657-7071
galen.clements@comcast.net
http://www.clementsglobal.com

LANCASTER

Earle Gay (LIFE)
E.B. Gay Intl.
1507 Butter Rd., Ste. #8
Lancaster, PA 17601
Tel: +1-717-399-3090
Fax: +1-717-945-5320
erlgei@yahoo.com

LANSDALE

Raymond Miley (LIFE)
Miley Inc.
PO Box 674, Lansdale, PA 19446
Tel: +1-215-643-2300

MCMURRAY

Ron Levi (2013)
Forensic Cyber Investigations
P.O. Box 1346, McMurray, PA 15317
Tel: +1-724-503-3600
ron@forensiccyberinvestigations.com
http://www.forensiccyberinvestigations.com

**PENNSYLVANIA
NORRISTOWN**

Stuart Drobny (2010)
Stumar Investigations
PO Box 1180, Norristown PA 19404
Tel: +1-610-592-0505
Fax: +1-610-592-0514
sdrobny@stumariniv.com
http://www.stumarinv.com

**PENNSYLVANIA
PHILADELPHIA**

Rockne Cooke (1989)
Commercial Index Bureau, Inc.
280 N. Spring Garden St.
Philadelphia, PA 19002
Tel: +1-877-542-1488
Fax: +1-215-542-9895
Rfc@Cibpi.com
http://www.cibpi.com

PITTSBURGH

Neal Holmes (1987)
Holmes International LLC
PO Box 12920, Pittsburgh, PA 15241
Tel: +1-412-854-1100
Fax: +1-412-835-0407
neal@holmesinternational.com

THORNDALE

Israel Mbachu (1996)
J.C.Owens Global Consultants, LLC
50 Skyview Lane, Thorndale, PA 19372
Tel: +1-610-383-4775
Fax: +1-610-383-7114
info@jcowensglobalconsulting.com
http://www.jcowensglobalconsulting.com

**SOUTH CAROLINA
CHARLESTON**

Vicki Childs (2003)
Blazer Investigative &
Security Consultants, LLC
PO Box 21297, Charleston, SC 29413
Tel: +1-843-971-0088
Fax: +1-843-971-0302
bigblaze@aol.com
http://www.blazerinvestigative.com

MT. PLEASANT

Laurie Langford (2013)
Tracker Investigations Inc., LLC
PO Box 634, Mt. Pleasant, SC 29465
Tel: +1-843-849-0081
Fax: 843-971-0640
Laurie@TrackerInvestigations.com
http://www.TrackerInvestigations.com

**TENNESSEE
MEMPHIS**

R.Q. Brewer (1986)
Brewer Detective Service Inc.
2555 Poplar Avenue
Memphis, TN 38112
Tel: +1-901-327-1818
Fax: +1-901-259-6942
Info@BrewerDetective.com
http://www.brewerdetective.com

Robin Brewer-Johnston (2004)
Brewer Detective Service Inc.
2555 Poplar Avenue, Memphis, TN 38112
Tel: +1-901-327-1818
Fax: +1-901-452-8235
rjohnston3@aol.com
http://www.brewerdetective.com

Andy Wilson (1996)
Wilson & Turner, Inc.
2752 Mt.Moriah Pkwy.
Memphis, TN 38115
Tel: +1-901-546-8585
Fax: +1-901-546-8584
raw@wilson-turner.com

NASHVILLE

Peter Cash (2006)
Corporate Intelligence Services Ltd.
PO Box 41453
Nashville, TN 37204
Tel: +1-972-588-1879
Fax: +1-615-370-9664
piforyou@bellsouth.net

**TEXAS
ADDISON**

Richard Marquez (2012)
Diligence International Group, LLC
16633 N. Dallas Pkwy., Ste. 600
Addison, TX 75001
Tel: +1-972-588-1887
Fax: +1-888-802-4317
richard.marquez@digroup-us.com
http://www.digroup-us.com

ARLINGTON

Greg Borders (2013)
Spectrum Investigations
4025 Woodland Park Blvd.
Arlington, TX 76013
Tel: +1-817-861-2222
Fax: +1-817-819-2333
g.borders@spectruminvestigations.com
http://www.spectruminvestigations.com

AUSTIN

Kimberly Armstrong (2011)
Bates Investigations, Inc.
4131 Spicewood Springs Rd., #J2
Austin, TX 78759-8600
Tel: +1-512-502-1111
Fax: +1-512-502-1112
kimberly@batesinvestigations.com
http://www.batesinvestigations.com

BALLINGER

James Cook (2005)
Maximum Protective Service, Inc.
804 Hutchings Ave., PO Box 71
Ballinger, TX 76821
Tel: +1-325-365-4800
Fax: +1-325-365-5743
mpsint@aol.com
http://www.surinamesecurity.com

**FLOWER MOUND
(DALLAS/ FOTHWORTH)**

Douglas Crewse (1983)
Investigative Associates, Inc.
5104 Abbey Glen Drive
Flower Mound, TX 75028
Tel: +1-972-491-2904
Fax: +1-972-491-2906
iai@airmail.net
http://www.investigativeassociates.com

GRANBURY

Gary Cooper (1997)
Insurance Investigative Services, Inc.
1502 Starlight Court, Granbury, TX 76048
Tel: +1-682-936-4100
gbcooper@charter.net

HOUSTON

Rob Kimmons (1989)
Kimmons Investigative Services, Inc.
5906 Dolores St., Ste. 225
Houston, TX 77057
Tel: +1-713-532-5881
rob@kimmonssecurity.com
http://www.kimmonssecurity.com

John Moritz (2009)

Moritz & Associates, Inc.
710 N. Post Oak Rd., Ste. 200
Houston, TX 77024
Tel: +1-713-516-8806
Fax: +1-713-263-9989
jmoritz@moritzassociates.com
http://www.moritzassociates.com

Bobby Newman (LIFE)

Kimmons Investigative Services, Inc.
5906 Dolores St., Ste. 225
Houston, TX 77057
Tel: +1-713-952-9660
Fax: +1-713-266-4002
bobby@newman-kimmons.com
http://www.kimmonsinv.com

ODESSA**John Minor (2011)**

John B. Minor
PO Box 12023
Odessa, TX 79768-2023
Tel: +1-432-553-6666
Fax: +1-432-550-5208
jminor@JohnBMinor.net
http://www.JohnBMinor.com

SAN ANTONIO**Sterling Smith (LIFE)**

Kelmar Global
2553 Jackson Keller, Ste. 200
San Antonio, TX 78230
Tel: +1-210-342-0509
Fax: +1-210-342-0731
sterling@kelmarglobal.com
http://www.kelmarglobal.com

UTAH**SALT LAKE CITY****Richard Romano (1985)**

Paramount Detective Agency Inc.
458 E 200 S
Salt Lake City, UT 84111-2103
Tel: +1-800-266-4458
Fax: +1-801-484-5907
parainfo@aol.com

Mary Schwartz (LIFE)

American Research Bureau
2386 East Heritage Way
Salt Lake City, UT 84109
Tel: +1-801-484-8585
Fax: +1-801-484-4440

SANDY**Mel Ashton (1998)**

A. A. & A. Process Services &
Consultation, Inc.
PO Box 964
Sandy, UT 84091
Tel: +1-801-652-2677
Fax: +1-801-553-0570
mash@sisna.com
http://www.melashton.com

VIRGINIA**ALEXANDRIA****Nicholas Beltrante (LIFE)**

Beltrante & Associates
PO Box 7600, Alexandria, VA 22307
Tel: +703-360-5000
Fax: +1-703-780-1551
info@screenthem.com

CENTREVILLE**William Marshall (2007)**

Veritas Intelligence, LLC
14001C Saint Germain Drive, #650
Centreville, VA 20121
Tel: +1-703-934-0103
Fax: +1-703-934-0106
bmarshall@veritasintelligence.com
http://www.veritasintelligence.com

FAIRFAX**Kevin Hooks (1991)**

Interprobe, Inc.
PO Box 1007, Fairfax, VA 22038
Tel: +1-703-385-0336
Fax: +1-703-385-0338
kevin@interprobe.net
http://www.interprobe.net

MCLEAN**Michael Hershman (1993)**

The Fairfax Group, LLC
6830 Elm St., Ste. 500, Mclean, VA 22102
Tel: +1-703-288-4569
Fax: +1-703-288-4569
mhershman@fairfaxgroup.us

WASHINGTON**BELLEVUE****Jeff Kirby (2010)**

Puget Sound Security, Inc.
PO Box 1892
Bellevue, WA 98009
Tel: +1-425-454-5011
Fax: +1-425-641-5888
jeffkirby@pssp.net
http://www.pugetsoundsecurity.com

EVERETT (SEATTLE)**John Jones (2003)**

The Jones Group Inc.
10813 10th Dr., S.E.
Everett, WA 98208
Tel: +1-425-985-6779
Fax: +1-425-823-8132
john@thejonesgroupinc.com
http://www.thejonesgroupinc.com

KENT**Michael Canaan (1994)**

Trident Investigative Service, Inc.
PO Box 5909
Kent, WA 98064-5909
Tel: +1-253-852-7000
mike@tridentseattle.com
http://www.tridentseattle.com

OAK HARBOR**Leroy Cook (LIFE)**

ION Incorporated
4548 Jones Road
Oak Harbor, WA 98277
Tel: +1-360-279-8343
lc@ioninc.com
http://www.pihome.com

SEATTLE**Georgia Kearns (LIFE)**

Kearns Investigations Inc.
PO Box 9774
Seattle, WA 98109
Tel: +1-206-256-6452
Fax: +1-206-443-9956
kearns@oz.net
http://www.kearnsinvestigations.net

Linda Montgomery (1994)

Linda Montgomery Investigations
1751 Nw 57th St.,
Seattle, WA 98107
Tel: +1-206-784-8151
Fax: +1-206-784-8162
Linda@Lmipi.com
http://www.Lmipi.com

SPOKANE VALLEY**Susan Peters (2012)**

S. Peters Investigations
PO Box 583
Spokane Valley, WA 99016
Tel: +1-509-720-3225
Fax: +1-509-241-3767
sue.peters@comcast.net
http://www.spinvestigations.net

WISCONSIN**BROOKFIELD****Karen Checki (2006)**

Private Investigation, Inc. of WI
200 S. Executive Dr., Ste. 101
Brookfield, WI 53005
Tel: +1-262-797-1700
Fax: +1-262-797-1701
piow@sbcglobal.net
http://www.privateinvestigationinc.com

WAUKESHA (MILWAUKEE)**Lawrence McIntyre (LIFE)**

Research Plus Inc.
PO Box 812, Waukesha, WI 53187
Tel: +1-262-542-3443
Fax: +1-262-542-3706

URUGUAY**MONTEVIDEO****Jorge Alliaume (2012)**

Detective Jack
Gregorio Funes 2929
Montevideo, 11200 Uruguay
Tel: +598-2487 5680
Fax: +598-2487 5680
info@djacksonline.com
http://www.detectiveprivado.com.uy

Mark McCabe (1992)

McCabe Associates, Inc.
Feliciano Rodriguez, 2673
Montevideo, Uruguay 11-300
Tel: +598-99-365-055
Fax: +598-99-365-055
solutions@mccabe1.com
http://www.mccabe1.com

WEST INDIES**TRINIDAD****Alexander Asson (1998)**

Asson Private Investigation Agency
#18 Layan Hill, Belmont, Port of Spain
Port Of Spain, Trinidad, West Indies
Tel: +1-868-789-0567
assonpi_tt50@hotmail.com

Sean Hutchinson (2009)

Private Investigations Ltd.
Corner Sanchez &
St. Joseph Streets, Arima
Trinidad, West Indies
Tel: +1-868-667-7334
Fax: +1-868-664-2393
classifiedinvestigations@gmail.com

GADELOUPE**SAINT-FRANCOIS****Etienne Chapas (2004)**

C.I.C. - Confidentielles Investigations
Caraibes
Bellevue - BP 95
97118 Saint-Francois
Guadeloupe (FWI), West Indies
Tel: +590-85 50 75
Fax: +590-85 55 47
cicenq@wanadoo.fr
http://www.detective-cic.com

ZIMBABWE**KOPJE, HARARE****John Woodward (2005)**

Safeguard Investigations (PVT) Ltd.
PO Box 66006, Kopje, Harare, Zimbabwe
Tel: +263-4751-395-9
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Tuesday August 27th

15:00 to 17:00 Registration

18:00 to 19:30 Welcome Reception

Wednesday August 28th

09:00 to 12:00 Registration Available

09:00 to 10:30 Board of Directors Meeting

10:30 to 10:45 Board Coffee Break

10:45 to 12:00 Board of Directors Meeting

12:00 to 13:30 Lunch on Own

13:30 to 16:00 Board of Directors

Thursday August 29th

09:00 to 10:30 General Business Session

10:30 to 10:50 Coffee Break

10:50 to 13:00 General Business Session

13:00 to 14:30 Lunch on Own

14:30 to 16:00 General Business Session

Friday August 30th

09:00 to 10:00 Seminar 1

“NONVERBAL COMMUNICATION STRATEGIES AND VIRTUAL RECONSTRUCTION TECHNIQUES IN INVESTIGATIONS”

Prof. Vincenzo Mastronardi – University La Sapienza of Rome

Vincenzo Maria Mastronardi, psychiatrist, clinical criminologist, professorship in “Forensic Psychopathology”, director of the “Master’s in criminological forensic science” at the Sapienza University of Rome and of the Master’s and on line specialisation course in Criminology, Investigative and Security Science at UnitelmaSapienza.

Professor at the Superior Council of the Magistrature. For the same university, he is responsible for the convention with the Traffic Police, the Railroad Police, Post and Telecommunication Police and the Special Forces of the State Police. Scientific co-director of two different Criminology Masters, in Buenos Aires and Montevideo. Author of 260 scientific publications and 26 books, and director & referee of multiple international journals such as International Journal of Offender Therapy and Comparative Criminology (editor in chief George B. Palermo), Sage Journals (Impact factor) in which he appears as Consulting Editor since 2005.

10:00 to 10:20 Coffee Break

10:20 to 11:20 Seminar 2

“TRADITIONAL AND SCIENTIFIC INVESTIGATIONS. THE CASE BILANCIA”.

Gen Dott. Luciano Garofano

Biologist, Ph D in Forensic Toxicology. Former Head of the Chemical – Biological Section of the Carabinieri Centre of Scientific Investigation in Rome; Head of the Compagnia Carabinieri of Milan Mirafiori; Head of the Biology Unit in the above section, where he was responsible for the realisation of a laboratory for DNA analysis and forensic examinations. Former Head of the RIS, Scientific Investigation Department of the Carabinieri Force in Parma; University Professor of Criminology and Crime Scene Investigation Techniques in Undergraduate and Postgraduate programmes. Author of several national and international scientific studies; author of many works on cases of international relevance, such as Imperfect Crimes, Imperfect Crimes Act II,

Mysteries and Murders from the Past, Cold Cases, The Imperfect Trial: the Truth about the Cogne Case, Accidental Murderers. Expert of DNA analysis and Blood Pattern Analysis. Founder of two international work groups on DNA analysis; member of the most prestigious national and international organizations of Forensic Sciences. Fellow member of the American Academy of Forensic Sciences. Carried out many forensic examinations of difficult cases for the Judicial Authorities. Retired from the Carabinieri Force since January 2010 in a general officer grade, he now works as a freelance consultant.

11:20 to 12:20 Seminar 3

“THE RELATIONSHIP BETWEEN PRIVATE DETECTIVES AND LAW-ENFORCEMENT AGENCIES. CRITICAL ISSUES”.

Colonel Lieutenant Carabinieri Force Salvino Paterno

Professor of Criminalistics and Investigation Methods at the ScuolaMarescialli in Velletri on behalf of the Florence University, Bologna University and Forli University. He taught in the 15th Training Course for Municipal Police Instructor, at the Rome Headquarters of the Municipal Police Force. He is currently working as a Professor of Criminology in Criminology and Forensic Science courses at the Sapienza University in Rome. Former Head of the 10th Intervention Platoon, Battaglione Campania, Naples; head of the Nucleo Operativo (Operational Core)of Torre Annunziata, of the Compagnia Carabinieri in Vallodella Lucania (SA) and in Policoro (MT) and of the Operation Units in Potenza and Rieti. He has published the following works with Laurus Robuffo Publishers: ‘Marking and Investigating the Crime Scene- How to Work on the Crime Scene; Anti-drug Operation Techniques.

12:20 to 14:00 Past President’s Lunch

14:00 to 15:00 Seminar 4

“SECURITY IN SYRIA TODAY: FACTS AND CONSIDERATIONS”.

Dott. Francesco Licheri

Worked with ENI, the Italian Oil & Gas Group and was posted abroad as ENI’s Representative as Area Manager for Sub-Saharan Africa & Middle East. He is a Professor & tutor at the Eni Corporate University, in Rome and San Donato Milanese (Milano). He participated as a Speaker at Conferences in Italy, Turkey and Morocco. His latest book review was” The Bible Unearthed. Archaeology’s new vision of ancient Israel and the origin of its sacred texts, by Israel Finkelstein and N.A.Silberman(2001). Dott. Francesco Licheri, M.Sc., Summa cum Laude, in Sociology (political), University of Rome “La Sapienza” is from the University of Bologna, Italy, School of Specialization in Labour Law & Industrial Relations.

15:00 to 15:20 Coffee Break

15:20 to 16:20 Seminar 5

“WHEN AND HOW AN AUTOBIOGRAPHICAL MEMORY TRACE IS ENCODED IN THE RESPONDENT’S MIND/BRAIN? THE IAT IMPLICIT ASSOCIATION TEST”

Prof. Giuseppe Sartori – University of Padua

The autobiographical IAT is a novel variant of the Implicit Association Test (IAT; Greenwald, Mc Ghee, & Schwartz, 1998) that may be used to establish whether an autobiographical memory trace is encoded in the respondent’s mind/brain. It has been validated both in forensic and in clinical settings. The autobiographical IAT allows one to evaluate which of two contrasting autobiographical events is true for a given individual. This is accomplished by requiring the respondent to complete two critical blocks of categorization trials, each of which pairs a different potentially autobiographical event with true events. Because pairing of a truly autobiographical event with true events should facilitate responses, the specific pattern of response times (RTs) in the two blocks indicates which autobiographical event is true and which is false. Prof Giuseppe Sartori specializes in Cognitive Neuroscience- University of Padua- Italy.. His area of research include disorders of semantic memory, neuropsychology of vision, forensic neuropsychology, medical decision making

Saturday August 31st

09:00 to 12:00 New Board of Directors Meeting

18:00 to 19:00 Cocktail Reception

19:00 to 22:00 Gala Banquet and Awards with Entertainment



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Observatory of Behaviours and Deviance
Master's in Criminological Forensic Science
Prof. Dr. Vincenzo Mastronardi

Roma (Italia)
Piazzale Aldo Moro, 5 - 00185 Roma
Tel. (06) 4991-2282 -
- Fax. (06) 99366507
e-mail: vincenzo.mastronardi@gmail.com



NONVERBAL COMMUNICATION STRATEGIES AND VIRTUAL RECONSTRUCTION TECHNIQUES IN INVESTIGATIONS.

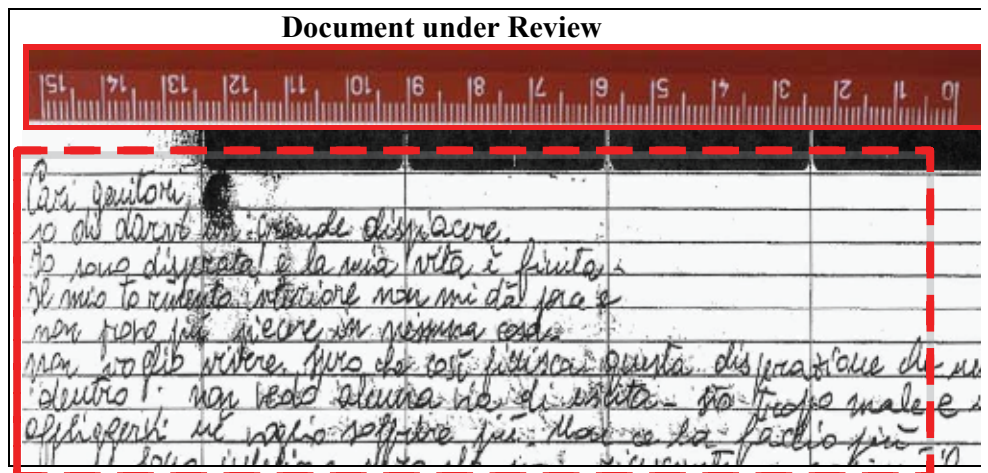
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Prof. Vincenzo Mastronardi
President of Scientific Committee of the GM Academy (Italy)



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"Virtual reconstruction of the crime scene Ballester in Buenos Aires"



" Virtual reconstruction on the crime scene in Rome "

or 3D, as film or static movement upon requests,



" Virtual reconstruction on the crime of Perugia (Meredith case - crime scene) "



" Virtual reconstruction on the critical event of Costa Concordia (Italy) "

all certified by the aforementioned spin-off of the "Sapienza" University of Rome.

Vincenzo Maria Mastronardi, psychiatrist, clinical criminologist, professorship in "Forensic Psychopathology", director of the "Master's in Criminological Forensic Science" at the Sapienza University of Rome and of the "Master's and on line Specialisation Course in Criminology, Investigative and Security Science" at Unitelma Sapienza.

Professor at the Superior Council of the Magistrature. For the same university, he is responsible for the convention with the Traffic Police, the Railroad Police, Post and Telecommunication Police and the Special Forces of the State Police. Scientific co-director of two different Criminology Masters, in Buenos Aires and Montevideo. Author of 260 scientific publications and 26 books, and director & referee of multiple international journals such as International Journal of Offender Therapy and Comparative Criminology (editor in chief George B. Palermo), Sage Journals (Impact factor) in which he appears as Consulting Editor since 2005.

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Titanic – Indelible Security Lesson

By Rashid Ali Malik, Brigadier (Retired) Pakistan Army

When it sank, a hundred years ago, it was taunted infallible. Even if it did, it was claimed that it will float for days for rescue to arrive. Threat, the Risk and any consequent management was considered irrelevant. The route taken, the gross shortage of buoys and boats, under assessed iceberg, led to the greatest tragedies of all times, eventually turned into a profitable drama. It was forgotten that the larger threat loomed unseen under the cold Atlantic waters off Cape Cod. Icebergs are known to be 9 parts underwater. I may not be entirely correct, but am only making a point. The historical list of Security failures can fill pages, pre and post TITANIC. Even today we lose sight of what we must do to protect, overcome by petty penny pushers and often ill advice from those who haven't a clue of what the security imperatives are while performing a task.

In my modest experience of almost 2 decades of Private Security I have learnt that the simple you keep your Plan, the

greater are the chances of your success. The Army had taught me this as well. As a security practitioner invariably (9 cases out of 10) you will be required to protect your client who constitute – People. Assets. Information. Reputation. The 1 exclusion that I am alluding to pertains to those tasked on special projects. All else like most of us are entrusted with providing a Plan, then executing it, revising it periodically, continue executing it until the contract runs out many times for no fault of yours.

So here is what I want to say. When appointed or contracted to execute a Security Contract – remember that today there is no Threat or Risk free business. Every corporation, every institution is prone if not to terrorism, invariably to competitors. Remember it takes years to build reputations, only moments to blow away the hard work and toil of the founding fathers. A good security practitioner lists what all that can go wrong with regards to people and material on charge and then

formulates a Plan or Strategy that will mitigate factors that constitute the Threat. One can only manage or lessen this but never completely preclude disaster or losses. The terms which we must constantly use are simple, awareness, diligence, profiling, surveys, employee checks, rehearsals, continuity, liaison, acceptance, to name a few. You may not dwell too much on high flying buzz words like enterprise, cloud, critical infrastructure, WMDs – important but not relevant to a large majority of us. And never forget Police, no where in the world is a friend of Private Security. Spending on security usually will conflict with privacy. The Snowdens of this world will compete with Wikileaks. Nothing can be implied or pushed under. One day all information will see light.

In the end, it will be worthwhile to ask could TITANIC be saved, less lives be lost. My answer is yes. Foremost would be the acceptance that everything that floats will sink, providing enough life saving equipment / rehearsals, route taken could be redone – more icebergs float south that time of the year and not appointing a Captain from retirement. No one is indispensable. But then had there been no TITANIC or its sinking how would we learn ! This is only for those who wish to learn and not for those who sadly who know everything.



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Scali del Corso, 5
57123 Livorno - Italy

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Director

58a Bauskas Street #302
Riga, LV - 1004
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President & CEO Mobile: (852) 9300 2864

Direct: (852) 3168 2180 E-mail: ben@totalcredit.hk
Tel: (852) 2850 6682 Ext 80 Fax: (852) 2854 3251
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WHITE PAPER

REDUCING REGULATORY RISK IN AN ERA OF INTENSIFIED ENFORCEMENT

Best Practices for Building a Comprehensive Compliance Program

By Kelvin Dickenson

Failure to comply can put your company at risk

Aggressive enforcement of the Foreign Corrupt Practices Act (FCPA) and related laws has many companies reevaluating their compliance controls and systems. The U.S. Department of Justice has stepped up its enforcement of the FCPA and increased the number of attorneys dedicated to enforcing it. In just the past two years, the government has prosecuted approximately 50 executives who have agreed to plead guilty to FCPA violations. Some are serving prison sentences of up to 15 years. Significant fines amounting to hundreds of millions of dollars have been levied against companies, including one fine exceeding \$1 billion. Other costs can be equally high: damaged corporate reputations and brands, mounting legal fees, distracted leadership, and falling share prices. The United Kingdom has initiated enforcement actions under its new Bribery Act as well, and several other countries have anti-corruption laws on the books or under consideration. In the United States, federal prosecutors have approximately 150 open investigations of alleged FCPA violations across multiple industries.

A pharmaceutical company was fined \$29 million for improper payments that its subsidiaries made to foreign government officials to win business in Russia, Brazil, China, and Poland.

Business leaders understand the need to protect the integrity of international markets, and they support government efforts to create a level playing field for law-abiding companies to compete and win business based solely on the price and quality of their products and services. However, as federal agencies have stepped up their investigations into bribery, money laundering, wire fraud, and other business crimes, many companies have struggled to understand their responsibilities and comply with regulations governing business conduct. Among their concerns:

- How can we monitor a multitude of international financial transactions and third-party business relationships—many seemingly beyond our ability to see or control—to prevent violations of anti-corruption laws?
- If an infraction does occur, how can we demonstrate that we acted in good-faith to prevent it, and thus minimize the likelihood of prosecution and fines?
- What are the best practices for implementing an effective compliance program?

Even the companies and banks that already have established compliance and training programs recognize the need to re-evaluate their activities in light of government's enforcement efforts. They face greater scrutiny, and larger penalties if the law is violated, particularly if prosecutors conclude that a company lacked sufficient controls or failed to conduct adequate due diligence. As federal agencies ratchet up enforcement of the FCPA, anti-money laundering, and other anti-corruption laws, many companies are looking for enhanced strategies and tools for cost-effective compliance that reduces their exposure and risk in today's strict regulatory climate.

New Government Guidance on FCPA

The Department of Justice (DOJ) and Security Exchange Commission (SEC) provided the industry with comprehensive guidance on its enforcement of the FCPA in November 2012 by issuing "A Resource Guide to the U.S. Foreign Corrupt Practices Act." DOJ and SEC experts created the guide to help businesses that compete in foreign markets "maximize their ability to comply with the FCPA in the most effective and efficient way suitable to their business and the markets in which they operate."¹ To this end, the guide spells out the "Hallmarks of Effective Compliance Programs," a detailed description of ten areas that companies should address to ensure that their programs are thorough and robust (see graphic below).²

HALLMARKS OF EFFECTIVE COMPLIANCE PROGRAMS

- *Commitment from Senior Management and a Clearly Articulated Policy Against Corruption*
- *Code of Conduct and Compliance Policies and Procedures*
- *Oversight, Autonomy, and Resources*
- *Risk Assessment*
- *Training and Continuing Advice*
- *Incentives and Disciplinary Measures*
- *Third-Party Due Diligence and Payments*
- *Confidential Reporting and Internal Investigation*
- *Continuous Improvement: Periodic Testing and Review*
- *Mergers and Acquisitions: Pre-Acquisition Due Diligence and Post-Acquisition Integration*

Source: DOJ-SEC "Resource Guide"

A Framework for Comprehensive Compliance

There is no one-size-fits-all approach to compliance. Each company must establish compliance measures that are tailored to its individual business needs, risks, and challenges, factors the DOJ and SEC take into account when evaluating a company’s program. One useful framework for understanding how the hallmarks might fit into a comprehensive compliance program is shown in Figure 1. This compliance framework has four basic components:

- *General Compliance Oversight*
- *Internal Controls and Behaviors*
- *Audit, Reporting, and Accounting*
- *Managing Third Parties*

Each of these components is essential for a program that addresses risks throughout the enterprise and on all fronts. As shown in Figure 1, each of the hallmark activities is contained within—that is, supports—one of the four components. All of the activities within the framework work together in an integrated, reinforcing manner to create a stronger, and more efficient compliance program.

A U.S. affiliate of a global bank was cited and fined for violating numerous statutes, including the Bank Secrecy Act, the International Emergency Economic Powers Act, and the Trading with the Enemy Act. DOJ officials also charged the bank with willfully failing to maintain an effective anti-money laundering program and failing to conduct due diligence on its foreign correspondent affiliates.

OVERSIGHT Senior management commitment Updating compliance policy through periodic testing and review Oversight by senior management with effective autonomy and resources		
INTERNAL CONTROLS & BEHAVIORS	AUDIT/REPORTING/ ACCOUNTING	MANAGING THIRD PARTIES
Code of conduct and clearly articulated compliance policies and procedures	Risk assessment and internal audit procedures	Comprehensive, risk-based due diligence on third parties and transactions
Continuing training for employees and third parties		Pre-acquisition due diligence and post-acquisition integration for mergers and acquisitions
Mechanisms for employees to report infractions and efficient, thorough investigation		
Enforced disciplinary measures for violations and incentives for compliance		

When building a comprehensive, well-coordinated compliance program incorporating these key areas, the goal is to create and sustain an organizational culture of compliance that strives for meaningful results, as opposed to simply ‘checking the box’. We have found that the most successful organizations follow three major guideposts.

1. BUILD IT

Develop a dynamic, risk-based compliance program that allocates spending and resources based on measured risk across all elements of your program.

A strong compliance program is necessary not only to minimize the risk of an infraction, but also the fines, legal fees, bad publicity, and other fall-out if an infraction does occur. As the DOJ-SEC guidelines suggest, companies should undertake a wide array of activities to minimize risk across the organization, including education and training, incentives and disciplinary measures, strong internal auditing and risk assessment and continuous review and improvement of the compliance program. Not only should the compliance program be tailored to a company’s unique activities and requirements, but it also should be dynamic in its ability to recognize and respond to changes in the company’s risk landscape. Because compliance activities in different areas are coordinated, they will be re-calibrated together to minimize emerging risks.

The DOJ-SEC guidelines say that when government officials are deciding whether to prosecute companies for FCPA and other violations, they will give “meaningful credit” to genuine efforts by companies to establish a strong compliance program and prevent wrongdoing— even if that program failed in the particular instance under investigation. For example, the DOJ decided to prosecute a former executive of a global financial services firm—but not the firm itself—when the DOJ determined the executive violated the FCPA and a number of securities laws. The DOJ said it declined to bring any enforcement action against the firm related to the executive’s conduct “after considering all the available facts and circumstances, including that [the firm] constructed and maintained a system of internal controls, which provided reasonable assurances that its employees were not bribing government officials.”³

In contrast, federal officials have come down hard on companies that fail to show strong commitment to a compliance process. When announcing a \$29 million fine against a pharmaceutical company because of bribes paid by its subsidiaries to foreign government officials, Antonia Chion, Associate Director in the SEC Enforcement Division, said, “When a parent company learns tell-tale signs of a bribery scheme involving a subsidiary, it must take immediate action to assure that the FCPA is not being violated. We strongly caution company officials from averting their eyes from what they do not wish to see.” Kara Novaco Brockmeyer, Chief of the SEC Enforcement Division’s Foreign Corrupt Practices Unit, echoed this advice, saying, the company and its subsidiaries “possessed a ‘check the box’ mentality when it came to third-party due diligence. Companies can’t simply rely on paper-thin assurances by employees, distributors, or customers. They need to look at the surrounding circumstances of any payment to adequately assess whether it could wind up in a government official’s pocket.”⁴

2. CONNECT THE DOTS

Converge and coordinate compliance efforts addressing the FCPA, anti-money laundering, and other regulations and laws governing foreign and domestic business transactions.

Business conduct that violates the FCPA may violate other statutes and regulations as well. For example, bribes paid to foreign government officials or other third-party intermediaries could be laundered through financial institutions to keep the crime hidden, thus violating anti-money laundering statutes (and potentially implicating unwitting financial institutions in the crime). Similarly, bribes or money laundering activities that are facilitated through wire transfers could constitute wire fraud.

The Internal Revenue Service (IRS) may pursue criminal charges for tax violations related to bribery and money laundering. Companies and people who violate the FCPA may also be guilty of violating Travel Act provisions.

Overall, companies and financial institutions that do business internationally or have global supply chains must comply with a complex maze of statutes and controls aimed at preventing corruption, keeping military weapons and sensitive technology from falling into the wrong hands, and stopping money laundering and other illicit financial transactions that support crime and terrorism (for example, see Figure 2).

A computer technology company was charged with violating the FCPA by failing to prevent a subsidiary from secretly setting aside money off the company's books to make unauthorized payments to phony vendors in India.

Figure 2: Tracking Compliance across Multiple Regulatory Regimes

	ETHICS/ANTI-CORRUPTION FCPA UK Bribery Act	SANCTIONS AND EXPORT CONTROLS Office of Foreign Assets Control CISADA*	ANTI-MONEY LAUNDERING, KYC** Bank Secrecy Act Anti Money Laundering USA Patriot Act
Financial Institutions	3 Suppliers, Affiliates and through transactions	3	3
Businesses that trade internationally	3 Affiliates and Distributors, Specifically Overseas	Suppliers	N/A
Businesses that have a global supply chain	3 Suppliers Overseas	Distributors, End Users	N/A

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*Comprehensive Iran Sanctions, Accountability, and Divestment Act

Given the close and often overlapping connections among these laws, companies may be able to achieve more synergy by combining their compliance resources. That is, rather than having one group address fraud, another sanctions, and yet another the FCPA, companies should consider bringing these resources together. The converged resources would have access to larger data sets and, perhaps, a wider variety of tools for analyzing the data. Because these legal violations and other forms of business fraud share so many common elements—such as a complicit employee—a red flag in one area may help uncover a crime in another. Similarly, when various compliance functions collaborate and work together, organizations are more likely to spot anomalies or turn up clues that independent investigations might miss. As with any change, companies will have to carefully manage the organizational and procedural transformations to ensure that the groups work together effectively and the desired outcomes are achieved.

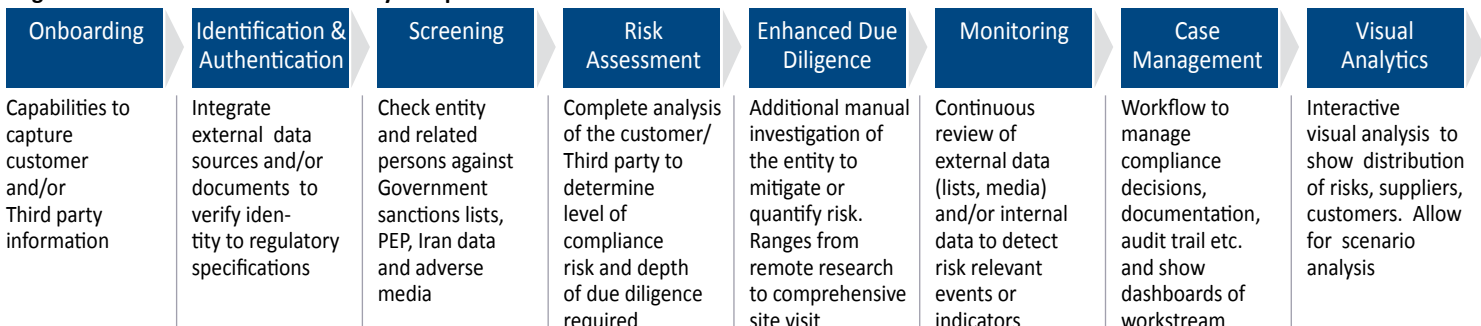
Converging compliance resources provides opportunities for cross-pollination of best practices and techniques among investigators and analysts, opens up new career paths, creates efficiencies, and reduces risk by strengthening the overall compliance program.

3. ENHANCE DISCOVERY

Third-party due diligence is a cornerstone of a strong compliance program for the FCPA and a host of related regulations and laws.

Many companies have struggled with building a strong program for third-party due diligence, which should be among the strongest portions of a company's overall compliance program. Why? Because third parties have been a common vehicle for transmitting bribes and other illicit conduct where violations have occurred. "DOJ's and SEC's FCPA enforcement actions demonstrate that third parties, including agents, consultants, and distributors, are commonly used to conceal the payment of bribes to foreign officials in international business transactions," the DOJ-SEC guide concluded.⁵

Figure 3: Best Practices for Third-Party Compliance Workflow



Robust third-party due diligence is required on many fronts. In addition to carefully vetting agents and other representatives who are conducting international business on their behalf, companies also must perform due diligence before a merger or acquisition to ensure they do not inherit FCPA and other related violations. This also holds true for joint ventures. Financial institutions also have to carefully monitor sovereign wealth funds to avoid violating the FCPA, anti-money laundering laws, and the Patriot Act. In all cases, companies and financial institutions must perform due diligence on Politically Exposed Persons (PEPs), who are considered a higher risk to engage in corrupt activities such as bribery and money laundering. Other statutes and regulations also require companies to conduct third-party due diligence, at a minimum screening all customers and suppliers against various lists of known terrorists, sanctioned parties and countries.

Third-party compliance encompasses, at a minimum, eight essential elements or steps. As shown in the workflow diagram (Figure 3), a rigorous third-party compliance process begins with onboarding and identification, followed by thorough screening against large, accurate, and up-to-date databases of relevant compliance-related information on companies and individuals. Analysis and assessment of risk may then require further investigation and monitoring of certain third parties. This process, along with the inevitable alerts from ongoing monitoring, means that robust case management and workflow capabilities are required; and for many corporations, data visualization may also be valuable to see risks on an enterprise scale, revealing risk levels and other pertinent information so that decision-makers can allocate compliance resources most effectively. An effective workflow also documents decisions and provides an audit trail, demonstrating the company's adherence to its compliance program.

A global manufacturer was fined \$26 million for violating the FCPA when subsidiaries arranged illicit payments to foreign officials in more than a dozen countries.

Overall, this eight-step workflow process enables companies to look deep into their entire third party network—consultants, lobbyists, agents, foreign dealers and resellers, suppliers, subcontractors, etc.—to identify hidden risks and mitigate accordingly.

Conclusion

Regulatory enforcement has heated up. Overseas distribution channels are growing in both size and complexity, while the United States and governments worldwide are expanding their enforcement of laws prohibiting bribery, falsified accounting records, money laundering, wire fraud, and other forms of corruption. Companies and their executives are subject to overwhelming fines and other penalties, not to mention reputational impacts, if violations occur – and particularly if prosecutors conclude that the companies lacked sufficient controls or failed to conduct adequate due diligence. This is the new normal in the regulatory environment. Delaying action won't make these risks go away; it will simply increase them. To address these many risks, companies should establish compliance programs that coordinate compliance activities across the organization. At the same time, new technology solutions and tools can enable them to exploit growing data stores to gain visibility into once-hidden partner relationships and risks. Within a comprehensive compliance framework, decision-making is fact-driven and based on rigorous assessment of risk, while processes and systems are structured to enable information sharing and collaboration among staff charged with compliance responsibilities. These processes also facilitate constant review of the business landscape so companies can adjust their compliance activities as needed to minimize changing risk profiles. By adopting a framework incorporating the four major compliance components identified above, as well as the ten hallmark activities identified by the DOJ-SEC, companies can build comprehensive, efficient, dynamic, and risk-based compliance programs that empower them to compete confidently and aggressively in the global marketplace.

About the author: Kelvin Dickenson D&B Compliance Solutions Kelvin Dickenson, who leads Compliance Solutions for D&B, has over 25 years' experience managing risk and compliance in financial services. He has worked at D&B for the past 7 years and prior to that he directed regulatory compliance, credit, loss prevention/risk management and collections activity for a major credit card bank. Kelvin's body of work ranges from designing compliance procedures to writing lending policies. He is now focused almost singularly on regulatory compliance relative to third parties and is a member of the advisory board at the Association of Certified Financial Crime Specialists. Mr. Dickenson is not an attorney and this White Paper is not intended to provide legal advice.




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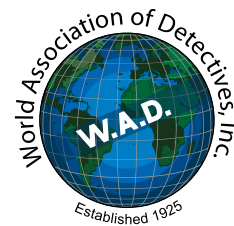
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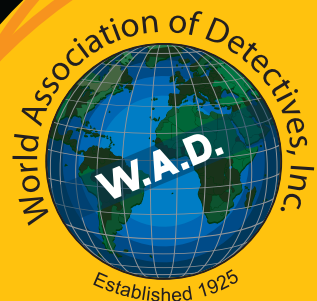
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